WYOMING SCHOOL DISTRICT COMPREHENSIVE PLAN



Jeffrey M. Newton, Superintendent

December 2, 2015

Jeffrey M. Newton District Superintendent

<u>2015-16</u> Plan Year



DISCLAIMER

This comprehensive district plan was developed by the Wyoming Department of Education (WDE) in cooperation with AdvancED Wyoming to align state and federal plan requirements to a common framework. This document meets the requirements of both the WDE and AdvancED for district continuous improvement.

DISTRICT COMPREHENSIVE PLAN DIRECTIONS

Writing Plans

There are three domains: Teaching and Learning, Leadership Capacity and Resource Utilization. For each domain:

1. ASSESS NEEDS

- Read related research, evaluate student performance and stakeholder survey data, and self-evaluate using the AdvancED rubrics to rate the level of implementation for each indicator as needs improvement, acceptable, or effective practice, or 1, 2, 3, or 4.
- Indicators rated as Level 4 on the AdvancED rubric are effective practices. Indicators rated as 3 are acceptable. Indicators rated as 1 or 2 are needs improvement.

2. STATUTORY ASSURANCES

• Review the statutes aligned to the indicators to ensure the district is meeting the requirements of Wyoming statute. *NOTE: Federal statutes will be included in the plan after the reauthorization of the Elementary and Secondary Education Act (ESEA).*

3. SUMMARY OF PRACTICES

• Districts may write summaries for any or all of the AdvancED indicators. The intent is that required plans are included in or attached as links to the summaries.

4. IMPROVEMENT PLANS

• The district improvement plan is required by AdvancED for accreditation.

Plan Submission

- Post the plan on the district web site in .pdf format or provide a view-only link.
- Send a link to Accreditation Consultant/Dianne Frazer at the Wyoming Department of Education (WDE) annually by November 1. (<u>Dianne.Frazer@wyo.gov</u>)
- Upload plan through the AdvancED Assurances in ASSIST every five years for accreditation.

Representative Assistance

- The plan template is currently available from WDE in Google Docs and as an Adobe Acrobat Form. Plans can be converted to Microsoft Word. Plan templates can be developed in other collaborative formats if necessary.
- WDE representatives will work collaboratively with districts using Google Docs (or another collaborative format) to develop district plans if requested.
- Plan <u>references</u> are provided in a separate document.

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RESOURCE UTILIZATION IMPROVEMENT PLAN

TEACHING AND LEARNING

Standard 3: Teaching and Assessing for Learning

Standards and Curriculum (3.1)

The system's curriculum provides equitable and challenging learning experiences that ensure all students have sufficient opportunities to develop learning, thinking, and life skills that lead to success at the next level. (District Rubric 3.1)

Acceptable

YES	The district provides educational programs sufficient for all students to meet uniform content and performance standards in all areas of the common core of knowledge and skills. (Wyoming)
YES	The district is providing foreign language instruction in grades K-2. (Wyoming)
YES	The district is providing instruction in the essentials of the state and federal constitutions. (Wyoming)
YES	The school district has established graduation requirements for students that meet or exceed state graduation requirements. (Wyoming)
YES	The district ensures that all Hathaway Scholarship Program course requirements including the Eighth Grade Unit of Study have been met and documentation submitted. (Wyoming)
YES	The district has entered into an agreement with a Wyoming community college district board of trustees or the University of Wyoming to provide eligible students the opportunity to enroll in postsecondary education programs offered by the university or a participating community college. (Wyoming)
YES	The district ensures that Career Technical Education courses are offered in a three-course sequence. (Wyoming)

Plans and Documents

Monitoring and Adjusting Curriculum, Instruction and Assessment (3.2)

Curriculum, instruction, and assessment throughout the system are monitored and adjusted systematically in response to data from multiple assessments of student learning and an examination of professional practice. (District Rubric 3.2)

Acceptable

Summary of Practices:

Instructional Strategies that Engage Students (3.3)

Teachers throughout the district engage students in their learning through instructional strategies that ensure achievement of learning expectations. (District Rubric 3.3)

Acceptable

Summary of Practices:

Instructional Leadership (3.4)

System and school leaders monitor and support the improvement of instructional practices of teachers to ensure student success. (District Rubric 3.4)

Effective

Summary of Practices:

The administrative team at UCSD #4 is active in developing both a formal observation schedule for all staff in the district, as well as formatively assessing staff in-between those formal observation opportunities. Three times a month the entire administrative team walks through a principal's building, observing the same three or four teachers and then the administrative team debriefs after the observations about what they saw and areas of focus for the building leader's follow-up conversation with those staff members. This allows the

administrative team to have a consistent level of quality feedback for staff and also allows for consistency between principals in terms of the expectations of quality when a teacher is instructing students. Furthermore, the district has Instructional Facilitators located in each building to provide instructional coaching, collaboration, and data analysis. At the elementary level a Direct Instruction coach observes and models for all Tier 3 (Intensive) math and reading teachers and provides on-going professional development

Collaborative Learning Organization (3.5)

System and school leaders monitor and support the improvement of instructional practices of teachers to ensure student success. (District Rubric 3.5)

Acceptable

Summary of Practices:

Professional development time is prioritized to allow staff the opportunity to reflect and revise their curricular options both individually and as a group. Staff has directed opportunities with in-building staff leadership and training, to be sure that staff is reviewing their curriculum and instruction, as well as student learning. However, the district needs to develop, implement, and evaluate a systematic approach that promotes discussion about student learning. There are currently examples of collaborative learning among staff members in the district but we need to make this more systematic. One possible solution would be creatively scheduling common planning time amongst content area teachers.

Instructional Process (3.6)

Teachers implement the system's instructional process in support of student learning. (<u>District Rubric 3.6</u>)

Effective

Summary of Practices:

Students generally benefit from the small teacher to student ratios. Teachers take pride in being able to get to know the students and treat them as individuals while maintaining high academic and behavioral standards.

All teachers effectively use learning targets in their daily lessons along with essential questions in their unit planning in Atlas. You will see student work displayed throughout our buildings along with success criteria posted with most learning targets.

Our past success in the state testing system, PAWS, is evidence that our instructional process and student learning is strong. We regularly score at or above the state average on PAWS.

Traditionally, MVHS fares better on statewide assessments than other schools of a similar size, but as we have made the transition to the ACT and ACT-suite as a school accountability measure, we recognize as a staff a need to increase the rigor in our core classrooms. There is a curricular focus on students being well-prepared for both classroom based assessments as well as nationally normed (MAP or ACT) assessments. As a result of increased summative assessment accountability from the state legislature, MVHS welcomes the inclusion of the ACT as a tool for measuring school performance and have shown improving composite ACT scores for the past four years, and surpassing the state average composite ACT score as well.

Mentoring, Coaching and Induction (3.7)

Teachers implement the system's instructional process in support of student learning. (<u>District Rubric 3.7</u>)

Acceptable

YES

The district employs instructional facilitators to provide leadership and mentoring for teachers and foster a learning community. Annual reports are submitted by the district on expenditures, strategies employed, and impact on student learning (Wyoming)

Plans and Documents

Family Engagement (3.8)

The system and all of its schools engage families in meaningful ways in their children's education and keep them informed of their children's learning progress. (District Rubric 3.8)

Acceptable

YES

The district has submitted all "Every Student Counts" (Uniform Report) information. (Wyoming)

Summary of Practices:

Student Advocacy Structure (3.9)

The system designs and evaluates structures in all schools whereby each student is well known by at least one adult advocate in the student's school who supports that student's educational experience. (District Rubric 3.9)

Acceptable

Summary of Practices:

Grading Practices (3.10)

Grading and reporting are based on clearly defined criteria that represent the attainment of content knowledge and skills and are consistent across grade levels and courses. (District Rubric 3.10)

Acceptable

Professional Learning (3.11)

All staff members participate in a continuous program of professional learning. (District Rubric 3.11)

Acceptable

YES

The district has developed and implemented a professional development plan that focuses on the development and implementation of standards and standards-based assessments, the instructional and student learning uses of technology, individual school improvement goals, assessed needs based on documented student results, and individual professional development goals. (Wyoming)

YES

The district provides annual training to all school personnel concerning discrimination, confidentiality, and occupational exposure to bloodborne pathogens, seclusion and restraint, training in district policy against harassment, intimidation or bullying and anti-suicide. (Wyoming)

Plans and Documents

Summary of Practices:

Learning Supports (3.12)

The system and its schools provide and coordinate learning support services to meet the unique learning needs of students. (District Rubric 3.12)

such as extended day tutoring and Summer School (Wyoming)

Acceptable

YES	The district is providing for the needs of all gifted and talented students through enrichments in regular instruction, enrichment programs, advanced or challenging courses, extension periods, & other strategies. (Wyoming)
YES	The district has policies and procedures for every school in the district to identify and intervene with at-risk students and to prevent at-risk behavior in each school (Wyoming)
YES	The district implements programs that include planned strategies for intervening with students who fail to demonstrate proficiency on the standards. Such programs include a continuum of supports

Plans and Documents

- District Early Literacy Plan
- English Language Learner Plan
- Title III (ELL) Improvement Plan
- Summer School and Extended Day Individual Student Learning Plan
- Summer School and Extended Day Program Plan

Standard 5: Using Results for Continuous Improvement

Student Assessment System (5.1)

The system establishes and maintains a clearly defined and comprehensive student assessment system. (District Rubric 5.1)

Acceptable

YES

The district has designed and implemented a district assessment system to measure student performance relative to district content and performance standards aligned to state standards. The system is designed so that all students have equality of educational opportunity to learn the content and skills represented in the standards and to the level established by the performance standards. The system includes administration of a common benchmark adaptive assessment in Reading and Mathematics at least 2 times a year in grades 1-8. (Wyoming)

YES

The district ensures that all third through eighth and eleventh grade students participate in the Wyoming state assessment of student performance or a standardized, curriculum-based achievement college entrance exam in reading and mathematics, and all fourth, eighth and eleventh grade students in science and the Wyoming state assessment of writing. (Wyoming)

Plans and Documents

District Assessment System Annual Report

Summary of Practices:

Collecting, Analyzing and Applying Learning from a Range of Data Sources (5.2)

Professional and support staff continuously collect, analyze and apply learning from a range of data sources, including comparison and trend data about student learning, instruction, program evaluation, and organizational conditions that support learning. (District Rubric 5.2)

Needs Improvement

VFS

The district assesses all grade levels, parents, and staff regarding school mission and student learning, school safety, service provision, equity, and opportunity to learn every three years. The results are used for school improvement planning. (Wyoming)

Plans and Documents

AdvancED Stakeholder Surveys

Staff indicated that there is a systematic process for the collection of data, however not all staff use and apply their access to the data in the same fashion. Staff also indicates that data training could be more rigorous in terms of emphasizing how their access to the data can be used to inform their instruction. As a district, we work to have the data move from one school to another consistently and this has been facilitated through our use of our student database of Mileposts which has an intuitive interface and provides access to historical data on groups as well as individual students in a way that few districts have had access to before.

Training Staff in the Interpretation and Use of Data (5.3)

Throughout the system professional and support staff are trained in the interpretation and use of data. (District Rubric 5.3)

Acceptable

Summary of Practices:

Determining Verifiable Improvement in Student Learning (5.4)

The system engages in a continuous process to determine verifiable improvement in student learning, including readiness for and success at the next level. (District Rubric 5.4)

Acceptable

Summary of Practices:

Communicating District and School Performance (5.5)

System and school leaders monitor and communicate comprehensive information about student learning, school performance, and the achievement of system and school improvement goals to stakeholders. (District Rubric 5.5)

Effective

Summary of Practices:

The district administration works to not only get data into the hands of staff, but into the hands of out-of-building stakeholders as well. Student relevant data is frequently published in appropriate forums (newsletters, Lunches with the Principal, the local newspaper, etc.) with a focus on communicating to stakeholders that the work the school does is important and effective.

There is a comprehensive district website that includes student achievement results and newsletters. School and student performance is discussed monthly, as an agenda item at school board meetings and weekly at administrator meetings. The superintendent prepares an annual report to stakeholders that is published every September and posted on the district website.

TEACHING AND LEARNING IMPROVEMENT PLAN

GOAL(S):

MEASURES AND METHODS (INTERVENTIONS):

Strategies (Processes) to Implement the Intervention	Timeline	Personnel and Financial Resources	Benchmarks
Develop a plan for teacher professional development that emphasizes the use of formative assessment in the classroom.	Ongoing 2015-2016	Administrator presentations specific to formative assessment, WILN walkthroughs	 District Professional Development calendar. Meeting agendas Examples of formative assessment given to staff
Formative assessment and student engagement as prioritized "look fors" in informal and formal walk-throughs and observations.	Ongoing 2015-2016	Administrator focus during walkthroughs	 Informal walk-through form documentation. Formal observation/Danielson rubric documentation Follow up conversations with staff after PD and informal walk-throughs
Emphasis on student engagement in the formative assessment process	Ongoing 2015-2016	Administrator focus during walk-throughs and staff professional development	 Re-introduction of ELEOT tool for student observation to staff as a point of focus for discussion/observation Discussion on the role of Bloom's taxonomy in formative assessment

Teacher walk-throughs of classrooms where effective formative assessment is consistently used.	Ongoing 2015-2016	 Administrator focus during planning hour time. Staff time during staff/planning hour meetings 	Focused discussion with staff regarding what does/does not work about formative assessment.

Evaluation/Evidence (How will you know when the intervention is fully implemented?)

LEADERSHIP CAPACITY

Standard 1: Purpose and Direction

District Purpose Revision Process (1.1)

The system engages in a systematic, inclusive, and comprehensive process to review, revise, and communicate a system-wide purpose for student success. (District Rubric 1.1)

Acceptable

Summary of Practices:

School Purpose Revision Process (1.2)

The system ensures that each school engages in a systematic, inclusive, and comprehensive process to review, revise, and communicate a school purpose for student success. (<u>District Rubric 1.2</u>)

Acceptable

Culture Based on Shared Values and Beliefs (1.3)

The school leadership and staff at all levels of the system commit to a culture that is based on shared values and beliefs about teaching and learning and supports challenging, equitable educational programs and learning experiences for all students that include achievement of learning, thinking, and life skills. (District Rubric 1.3)

Acceptable

Summary of Practices:

District Improvement Process (1.4)

Leadership at all levels of the system implement a continuous improvement process that provides clear direction for improving conditions that support student learning. (District Rubric 1.4)

Acceptable

YES	The district monitors the school improvement planning of its schools and coordinates activities that support implementation of those plans. (Wyoming)
YES	The district participates in the State Accountability System, assures participation of all district schools, and monitors and assists schools in improvement processes. (Wyoming)
YES	School improvement plans and communication plans are approved annually by the district and submitted to the state. (Wyoming)

Plans and Documents

• District Improvement Plan for Accreditation

Standard 2: Governance and Leadership

Board Policies and Practices (2.1)

The governing body establishes policies and supports practices that ensure effective administration of the system and its schools. (District Rubric 2.1)

Acceptable

YES	The district assures that up-to-date board of trustees' policies, rules, and regulations, promulgated according to the requirement of the Wyoming Administrative Procedure Act have been developed and are available for public inspection. (Wyoming)
YES	The district has a process in place for reviewing home-school curricula. (Wyoming)
YES	The district causes the flags of the United States of America and the State of Wyoming to be displayed when school is in session in, upon, or around each school building. (Wyoming)

Summary of Practices:

District Board Operations (2.2)

The governing body operates responsibly and functions effectively. (District Rubric 2.2)

Acceptable

YES

The board of trustees of the district adheres to the following Wyoming statutes:

- School Districts in General
- Open Meeting Law
- Ethics and Disclosure Act

Summary of Practices:

Leadership Autonomy (2.3)

The governing body ensures that the leadership at all levels has the autonomy to meet goals for achievement and instruction and to manage day-to-day operations effectively. (District Rubric 2.3)

Effective

Summary of Practices:

There is a focus on improving instruction district-wide and giving even those veteran staff members who are focused and engaged in their jobs appropriate "next steps," to help them improve their practice. There is an expectation from the district office for reliability that all staff are observed and evaluated according to district policies and procedures and that the

evaluation process is worthwhile for staff and administration. District leadership allows building principals the autonomy to manage their buildings according to the needs of the students and staff, but there is also a push toward consistency between the buildings in terms of some of the high level efforts and pockets of excellence.

Leaders and Staff Foster Culture (2.4)

Leadership and staff at all levels of the system foster a culture consistent with the system's purpose and direction. (<u>District Rubric 2.4</u>)

Acceptable

Summary of Practices:

Stakeholder Engagement (2.5)

Leadership engages stakeholders effectively in support of the system's purpose and direction. (District Rubric 2.5)

Acceptable

YES

The district has procedures for involving parents and community in decision making, implementation of standards, goal setting and planning for school improvement, and identification of budget priorities based on student performance standards. (Wyoming)

Summary of Practices:

Leader and Staff Evaluation (2.6)

Leadership engages stakeholders effectively in support of the system's purpose and direction. (District Rubric 2.6)

Acceptable

YES

The district has a State Board of Education/WDE approved teacher performance evaluation system that was approved in 2011 or later. The system is used to formally evaluate the performance of each initial contract teacher at least twice annually and every continuing contract teacher at least once each year. (Wyoming)

LEADERSHIP CAPACITY IMPROVEMENT PLAN

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MEASURES AND METHODS (INTERVENTIONS):

Strategies (Processes) to Implement the Intervention	Timeline	Personnel and Financial Resources	Benchmarks

Evaluation/Evidence (How will you know when the intervention is fully implemented?)

RESOURCE UTILIZATION

Standard 4: Resources and Support Systems

Staff Recruiting and Retention (4.1)

The system engages in a systematic process to recruit, employ, and retain a sufficient number of qualified professional and support staff to fulfill their roles and responsibilities and support the purpose and direction of the system, individual schools, and educational programs. (District Rubric 4.1)

Acceptable

YES	The district complies with the Wyoming Teacher Employment Law. (Wyoming)
YES	The Professional Teaching Standards Board has issued certificates with necessary endorsements covering specific assignment(s) to each professional staff member. (Wyoming)
YES	The assignment of staff members in in accordance with the certificates and endorsements as specified in the certification regulations set by the Professional Teaching Standards Board. (Wyoming)

Sufficient Resources (4.2)

Instructional time, material resources, and fiscal resources are sufficient to support the purpose and direction of the system, individual schools, educational programs, and system operations. (District Rubric 4.2)

Effective

YES	The district complies with the Wyoming State Board of Education's definition of the minimum hours of student/teacher contact and minimum days per year O All schools in the district operate on a regular calendar including at least 175 student contact days and at least 185 teacher days, or the district has received approval from the State Board of Education for any schools that operate on an alternative calendar
YES	On President's Day, Veterans Day, Martin Luther King Jr. Day, Wyoming Equality Day, and general election day, the district's schools are not dismissed except by order of the board of trustees of the district. Exercises to emphasize the significance of these days are optional to the schools. (Wyoming)
YES	The following days are appropriately observed:
YES	The district maintains the student-teacher ratio within state guidelines

Summary of Practices:

Staff recognizes that consistently Standard 4 is an area of strength. A portion of this strength is attributed to being in Wyoming; there is no better place to be in education. To suggest, however, that every district or school in Wyoming would see Standard 4 as their area of strength, limits those who work to have resources model the expected vision for students.

As a district we also prioritize our instructional calendar to maximize learning time for students. Beginning in December or January, the administrative team works to build the next year's district calendar with an emphasis on prioritizing time in class for all students. Specific Friday's throughout the year are targeted when we know a large number of students are going to be out of the building (regional volleyball and basketball are prime examples, but there are many). With so many of our students involved in activities (over 80% of our students participate in some extra or co-curricular activity) we work to limit the time in school that they miss due to their involvement in activities; simultaneously we limit the amount of time that our students who are in the building are being taught by substitutes. As a district what we currently use is an excellent hybrid of a four day week calendar and the

traditional five day per week calendar. The Friday's are not regularly. placed through the months, they are prioritized according to the needs of the students and avoiding wasting instructional time and unnecessary costs associated with substitutes working with our students.

Safe, Clean and Healthy Environment (4.3)

The system maintains facilities, services, and equipment to provide a safe, clean, and healthy environment for all students and staff. (District Rubric 4.3)

Effective

YES	The district ensures that students are educated in a safe environment that meets all building, health, safety, fire, and environmental codes and standards required by law for all public buildings. (Wyoming)
YES	The district has policies and procedures clearly in place to ensure that potential crisis situations are addressed. Crisis management plans are developed and are practiced on a regular basis. (Wyoming)
YES	The district ensures that eye protection is provided and used in compliance with state statutes. (Wyoming)
YES	The district ensures that all schools maintain on file written documentary proof of immunization or written immunization waiver for every student enrolled. The district monitors compliance with this requirement. (Wyoming)
YES	The district has developed and has on file the policy for required notification of pesticide application on or within school buildings. (Wyoming)
YES	The district meets all the requirements of the law for school bus standards, operators, and vehicle operation. (Wyoming)

Plans and Documents

• District Crisis Management Plan

Summary of Practices:

With the recent construction of our new K-8 school, our school security and safety has been greatly enhanced through better school design, including security vestibules, video cameras, and immediate lock-down capabilities. Currently any visitor during the school day needs to be admitted into the building by a school secretary or other office personnel. In terms of feedback regarding these changes, complaints from parents or community have been nonexistent to the office. Despite this significant shift for a small community school, parents have been supportive in our efforts to emphasize school safety. We believe this is indicative of the trust that the community has of the school and a willingness the school has to insure that each student is safe while at school.

Strategic Resource Management (4.4)

The system demonstrates strategic resource management that includes long-range planning in support of the purpose and direction of the system. (District Rubric 4.4)

Acceptable

YES

The district assures that school funds are kept as prescribed by the Uniform Municipal fiscal Procedures Act and Wyoming School Budgeting, Accounting and Reporting Manual. (Wyoming)

Plans and Documents

- School District Facility Plan
- Transportation Plan

Summary of Practices:

Information Resources (4.5)

The system provides, coordinates, and evaluates the effectiveness of information resources and related personnel to support educational programs throughout the system. (District Rubric 4.5)

Acceptable

Summary of Practices:

Technology Resources (4.6)

The system provides a technology infrastructure and equipment to support the system's teaching, learning, and operational needs. (<u>District Rubric 4.6</u>)

Acceptable

YES

The district has developed and implemented a technology plan that addressed professional development, curriculum integration, media services and network connectivity. (Wyoming)

Plans and Documents

District Technology Plan

Supports to Meet Physical, Social and Emotional Needs (4.7)

The system provides, coordinates, and evaluates the effectiveness of support systems to meet the physical, social, and emotional needs of the student population being served. (District Rubric 4.7)

Effective

Summary of Practices:

All students in UCSD #4, whether they are involved in special services or not, have a variety of resources at their disposal if they begin to struggle. It is not uncommon for building principals to provide for general education students with short-term counseling services generally reserved for students on IEP's, particularly in times of crisis. In every case we work to not only provide the instructional resources teachers need in terms of prioritizing instructional time, but also provide what the individual student needs in order to be safe and secure at school.

We are pleased with the continued progress of our special education students. They are benefitting from the overall program, and although their scores do not always represent the highest levels of achievement, we continue to have a focus on transition for these students and giving them multiple opportunities while in high school to gain experiences that are going to benefit them after they graduate. It is always a focus for us to give each student multiple opportunities in terms of being able to choose a direction after high school. It has also been a philosophy of MVHS to ensure that each junior takes the statewide ACT test and receives a college-reportable score. We don't want a situation where five years down the road after graduation, a student changes their mind and decides to attend a 2-year college, but doesn't have a valid ACT score. We want students to give their best effort with ACT-approved accommodations.

Along with an in-district school psychologist and in-building counselors, we have a contract with an outside counseling firm that delivers assessments and services for students in the district in need of additional counseling. These students may or may not be on IEP's, but the contract allows the building principal to prioritize a student who may be having a discipline issue or academic issues. This allows a student to receive additional services, that may just not be available in other communities.

Services to Support Student Educational Needs (4.8)

The system provides, coordinates, and evaluates the effectiveness of services that support the counseling, assessment, referral, educational, and career planning needs of all students. (<u>District Rubric 4.8</u>)

Acceptable

YES	The district ensures that all students have access to guidance services that provide assistance in developing and monitoring their educational and career plans through a structured, systematic individual planning process. (Wyoming)
YES	The district is providing for the needs of all disabled students and is in compliance with statutory requirements. (Wyoming)

Summary of Practices:

For assurances marked NO, please explain what is preventing your district from meeting this requirement and what support is needed to assist your district in meeting this requirement.

RESOURCE UTILIZATION IMPROVEMENT PLAN

MEASURES AND METHODS (INTERVENTIONS):

Strategies (Processes) to Implement the Intervention	Timeline	Personnel and Financial Resources	Benchmarks

Evaluation/Evidence (How will you know when the intervention is fully implemented?)