Idaho Department of Education

October 19, 2026

Mr. Laird,

Thank you for your inquiry regarding the performance and oversight of Clark County School District. The Idaho Department of Education appreciates the opportunity to address the questions raised that fall within its statutory responsibilities. While portions of your correspondence were difficult to evaluate because some of the cited statutes, requirements, and references were either inaccurate or did not align with current law, we have nevertheless reviewed each issue on its merits.

In summary, while the Department recognizes that, like many school districts, Clark County School District has areas where continued improvement may be appropriate, our review did not identify any egregious violations of law, significant compliance failures, or other findings that would warrant corrective action beyond the supports and oversight already provided through established state processes. For ease of reference, responses to each of your questions are provided below and **are labeled consistent** with the format used in your request:

Question #4 from Mr. Laird
"All records concerning the designation of Clark Jr./Sr. High School as Comprehensive Support and Improvement - Underperforming, including the designation notice, the supports offered or provided to the district under that designation, and any monitoring, site visit, progress review or exit determination."

IDE Response – link to documentation

According to **Patty Dalrymple, School Improvement & Support Coordinator**, Clark County Jr./Sr. High School was identified as a Comprehensive Support and Improvement (CSI-UP) school in 2022 and participated in the state-supported improvement process, including technical assistance, monitoring, and school improvement planning.

Ms. Dalrymple noted that school leadership actively engaged in the process and demonstrated measurable academic progress, including meeting the exit criteria in ELA and improving mathematics proficiency by 7%.

The school's continued identification in 2025 was based on accountability criteria rather than any finding of misconduct, and the record reflects the district's commitment to improvement and compliance with all required school improvement activities.

Question #6 from Mr. Laird
Any record showing whether the department has ever notified Clark County School District No. 161 that it was not demonstrating progress toward the goals in its plan, and any support, recommendation, mentorship referral or corrective step taken as a result.

IDE Response

The Idaho Department of Education has no records indicating that Clark County School District No. 161 has been notified that it was not demonstrating progress toward the goals contained in its strategic or continuous improvement plans. Likewise, the Department has no records showing that the district was identified as deficient in any of the areas referenced in this request.

As a result, the Department has no records of supports, recommendations, mentorship referrals, corrective actions, or other interventions undertaken in response to a determination that Clark County School District No. 161 was failing to make progress toward its established goals. The records available to the Department do not reflect any findings that would warrant such actions.

Question #7 from Mr. Laird
The matrix adopted by the State Board of Education under section 33-320(6), Idaho Code, to be used in evaluating a district's progress toward the student-outcome goals in its strategic performance plan, together with the date of its adoption.

IDE Response

Pursuant to Idaho Code § 33-320(5), local education agencies are not required to submit their initial strategic performance plans until October 1, 2027. Accordingly, no formal evaluation of a district's progress toward its student outcome goals will occur until the subsequent annual submission cycle in October 2028, when districts will report on implementation and progress related to their adopted plans.

At this time, the Idaho Department of Education has focused its implementation efforts on supporting districts in the development of meaningful goals, evidence-based strategies, and locally relevant measures of success. As districts begin implementing their plans, the Department's review will primarily focus on whether identified strategies are being implemented

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with fidelity and whether districts are engaging in continuous improvement efforts to improve student outcomes. Given that the strategic planning process is still in its initial implementation phase, the matrix referenced in Idaho Code § 33-320(6) has not yet been utilized to formally evaluate district progress toward established student outcome goals.

Question #8 from Mr. Laird
Any guidance, template or instruction issued by the department to school districts concerning the strategic performance plan required by section 33-320, Idaho Code, as amended in 2026, including the submission deadline of 1 October and the quarterly review obligation placed on local governing boards by section 33-320(8)(a).

IDE Response – link to documentationStrat Plan

Question #9 from Mr. Laird
Any application submitted by Clark County School District No. 161 to use alternative student success measures under section 33-320(4), Idaho Code, and the department's response to it. If no such application has been submitted, a written statement to that effect.

IDE Response
While Clark County School District may be eligible to pursue that option, the Idaho Department of Education has implemented the state's strategic planning and accountability framework in a manner that already provides substantial flexibility for districts to establish goals, measures, and indicators that reflect their unique student populations and local circumstances.

As a result, it has not been necessary for the district to seek alternative student success measures to account for the characteristics of its student population. The Department's current implementation model allows districts to incorporate locally relevant outcomes and performance measures while remaining aligned with state requirements. Accordingly, the Department is not aware of any concerns that would require Clark County School District to pursue alternative measures beyond the flexibility already available within the existing framework.

Question #10 from Mr. Laird
Records showing the amount distributed to Clark County School District No.161 under section 33-320(17), Idaho Code, for school board and leadership development training in each year such a distribution was available, the amount claimed for reimbursement by the district, and the training for which reimbursement was claimed.

IDE Response

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Records maintained by the Idaho Department of Education indicate that Clark County School District No. 161 received reimbursement under the Continuous Improvement Reimbursement program as follows: FY2022: $0.00, FY2023: $2,000.00, FY2024: $2,000.00, FY2025: $590.00, and FY2026: $3,499.90, for a total reimbursement of $8,089.90.

It is important to note that Idaho Code § 33-320(17) does not require a local education agency to request reimbursement for all, or any, available funds. Participation in the reimbursement program is voluntary, and districts may determine whether and to what extent they seek reimbursement based on their local training priorities, participation levels, and eligible expenditures.

Reimbursement requests submitted by Clark County School District No. 161 reflect the district's voluntary use of the program to support school board and leadership development activities. The reimbursement amounts neither indicate a deficiency in training nor establish any obligation to expend available funds but rather demonstrate the district's use of state-supported professional development opportunities as determined appropriate by local leadership.

Question #11 from Mr. Laird
The department's records of the average daily attendance and enrollment reported by Clark County School District No. 161 for each year from 2015-2016 through 2025-2026, and the state distribution made to the district under section 33-911, Idaho Code, in each of those years

IDE Response
Information on average daily attendance, enrollment, and state distributions is readily available on the IDE's website.

a. Whether Clark County Jr./Sr. High School conforms to the accreditation standards established by the Board under section 33-119, Idaho Code, and if it does not, in which respects.

IDE Response – link to documentation

Clark County Jr./Sr. High School is in full compliance with applicable accreditation standards and maintains continuous accredited status. According to **Dr. Michael Garrett, Director, Accreditation and Certification Services for Cognia**, the school's accreditation history dates to July 1, 1973, and reflects decades of uninterrupted accreditation, successful external reviews, positive accreditation commission actions, and sustained compliance with Cognia standards. The school successfully advanced from candidate status to full accreditation following its 2013-14

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External Review, earned an IEQ score of 292.00 in 2019, and most recently received an extension of its accreditation term through June 30, 2032. Based on the records provided by Cognia, there is no indication that Clark County Jr./Sr. High School is out of compliance with accreditation requirements; rather, the record demonstrates a strong and well-established history of meeting accreditation expectations and maintaining accredited status.

b. Whether the district's improvement plans for the years 2016 through 2026 met the requirements of section 33-320, Idaho Code, as that section read in each of those years, and whether any of them were reviewed by the Board or by the State Department of Education.

IDE Response
The Idaho State Board of Education received and reviewed the Clark County School District Continuous Improvement Plans for the years 2019 through 2026. The review process resulted in suggested revisions to the 2019, 2020, and 2022 plans. The 2023, 2024, 2025, and 2026 plans were received and found to be compliant with applicable statutory and state requirements. Based on available records, these plans were reviewed through the state's established Continuous Improvement Plan review process.

c. Whether the goals set in those plans, in particular a mathematics proficiency goal of 30.0 percent held constant for three years, satisfy the requirement that a plan set clear and measurable goals for student outcomes.

IDE Response
The Idaho State Department of Education does not require school districts to change their Continuous Improvement Plan goals annually. Districts may retain goals across multiple years when those goals remain relevant to identified needs and ongoing improvement efforts. The focus is on demonstrating progress toward the goals and using data to inform continuous improvement, rather than on changing goals from year to year.

d. Whether the district has complied with the requirement that the board of trustees monitor progress toward the goals in its plan, and whether that progress has been considered in the superintendent's evaluation as the statute requires.

IDE Response
Information regarding whether the Clark County School District Board of Trustees has monitored progress toward the goals contained in its strategic plan is not maintained by the Idaho Department of Education. Monitoring of local board governance activities is not a function performed by the Department, nor is the Department aware of any state agency that routinely collects or reviews such information.

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With respect to superintendent evaluations, annual audits conducted for Clark County School District indicate that the district is compliant with applicable superintendent evaluation requirements. The Department has no records suggesting noncompliance in this area. Accordingly, while the Department cannot verify the specific manner in which strategic plan progress may have been considered by the Board of Trustees during superintendent evaluations, the records available to the Department do not indicate any deficiency with respect to the district's superintendent evaluation obligations.

e. Whether the supervision contemplated by section 33-116, Idaho Code, has been exercised with respect to this district at any time in the last ten years, and in what form.

IDE Response
During the last ten years, the Idaho Department of Education has not exercised any extraordinary supervisory authority over Clark County School District pursuant to Idaho Code § 33-116. The district has operated under the governance of its locally elected board of trustees and administration, consistent with Idaho law. Any interactions between the Department and the district have been conducted through routine statewide processes, including technical assistance, program support, accountability reporting, and monitoring activities applicable to districts throughout Idaho. The Department is not aware of any instance during this period in which Clark County School District was placed under special supervision, control, or intervention pursuant to Idaho Code § 33-116.

f. Whether this district qualifies to apply for alternative student success measures under section 33-320(4), Idaho Code, given that it reports fifty-nine percent of students from low-income families, thirty percent English learners, seventeen percent with disabilities and five percent homeless, and whether it has ever been advised of that option.

IDE Response
This question was answered previously in question #9.

In closing, thank you for your interest in the operations and performance of Clark County School District. The Idaho Department of Education has reviewed the matters raised in your inquiry and, while opportunities for continuous improvement exist in every school system, the information available to the Department does not indicate violations of law, systemic noncompliance, or other circumstances warranting corrective action. Rather, the records reflect a district that has participated in applicable state and federal processes, engaged in improvement efforts when

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appropriate, and continued to serve students within the framework established by Idaho law. We trust this information is helpful in addressing your questions

Professionally,

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