

SUPREME COURT OF WYOMING

Campbell County School District v. State, 2008 WY 2

181 P.3d 43 (Wyo. 2008) · No. Nos. 06-74, 06-75 · Decided January 8, 2008

SUMMARY

The Supreme Court of Wyoming held that the state's public-school finance and capital-construction funding system satisfied the Wyoming Constitution's thorough-and-efficient education requirement. The court addressed challenges concerning operations funding, recalibration of the cost-of-education model, teacher salaries, special-needs funding, and school facilities, while requiring certain adjustments. The court ended its retained jurisdiction over compliance with prior school-finance decisions.

CASE DETAILS

COURT	Supreme Court of Wyoming
WRITING FOR THE COURT	Kite, Justice; Voigt, C.J.; Golden, J.; Kite, J.; Donnell, DJJ.; Young, DJJ.
JURISDICTION	Wyoming
DECIDED	January 8, 2008
DOCKET	Nos. 06-74, 06-75
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Consolidated appeals from a district court judgment following a bench trial concerning whether Wyoming's revised public-school operations and capital-construction funding systems complied with prior constitutional mandates.
STANDARD OF REVIEW	The court reviewed factual findings after the bench trial for clear error and legal conclusions de novo. Constitutional questions concerning whether the funding system produced wealth-based disparities were reviewed under the applicable equal-protection analysis, while factual compliance with prior mandates was reviewed for clear error.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	Campbell County School District, State of Wyoming, et al., Laramie County School District No. One, et al., Wyoming Education Association, Wyoming School Board Association, Big Horn County School District No. One, et al., State of Wyoming v. State of

Wyoming, Campbell County School District, State of Wyoming, et al., Laramie County School District No. One, et al., Wyoming Education Association, Wyoming School Board Association, Big Horn County School District No. One, et al., Big Horn County School District No. One, et al.

TOPICS

constitutional law

equal protection

strict scrutiny

PRACTICE AREAS

constitutional law

education law

school finance

equal protection

administrative law

QUESTIONS PRESENTED

1. Whether Wyoming's revised cost-based operations-funding model complied with the constitutional mandates established in Campbell II.
2. Whether the State's operation-and-maintenance funding formula violated equal protection by limiting funded square footage.
3. Whether the State adequately funded at-risk students, vocational education, small schools, small districts, regional cost differences, and inflation.
4. Whether the Wyoming Constitution required the State to fund voluntary preschool programs.
5. Whether the statutory and regulatory capital-construction system was constitutional despite the State's failure to remedy all immediate-need facilities within the deadlines previously imposed.
6. Whether the challengers were entitled to reimbursement of alleged funding shortfalls or attorney fees.

HOLDINGS

1. The State's operations-funding system, considered as a whole, satisfied Wyoming's constitutional requirement to provide a thorough and efficient education funded from statewide wealth, subject to specific corrections and implementation requirements identified by the court.
2. When the issue is whether revisions to a cost-based funding model accurately reflect the cost of education, the court reviews the district court's factual findings for clear error; strict scrutiny is not the appropriate test unless the funding difference is wealth-based.
3. The State's operation-and-maintenance funding approach did not violate the equal-protection clause of the Wyoming Constitution.
4. So long as Wyoming uses a cost-of-education model, regional cost-of-living adjustments may not reduce salaries below the statewide cost of hiring personnel established by the model. Adjustments must permit districts in higher-cost areas to attract and retain teachers and must recognize housing costs as a significant component of cost of living.

5. A historic-cost funding model must be adjusted for inflation so that its figures continue to represent the current cost of education, but the legislature is not required to use a particular inflation index.
6. The Wyoming Constitution does not require the State to fund voluntary preschool programs for children under age six.
7. Wyoming enacted a comprehensive and constitutional statutory plan for school capital construction funded from statewide wealth, although implementation deficiencies required case-by-case review of facilities.

KEY QUOTATIONS

“We hold that the system is constitutional. Some deficiencies exist, some changes are required and new issues will arise; however, this Court is satisfied that the legislature has in place a thorough and efficient educational structure funded from state wealth as required by our state constitution.” (48)

“This is not a zero sum game.” (63)

“We hold that, so long as the state relies upon a cost of education model, regional cost of living adjustments cannot reduce salaries below those which the state's model establishes as the statewide cost of hiring personnel.” (64)

FACTUAL BACKGROUND

Wyoming had developed a statewide cost-based block-grant model for funding public-school operations and a separate state-funded system for school capital construction after earlier decisions found wealth-based disparities unconstitutional. The State recalibrated the operations model, revised funding for at-risk students, vocational education, small schools and districts, inflation, utilities, and regional costs, and created the School Facilities Commission to administer capital-construction standards and funding. At the time of trial, some school facilities remained in immediate need of repair or replacement, and the implementation of the regional cost-of-living adjustment reduced funding for some districts below the statewide modeled salary level.

PROCEDURAL HISTORY

In Campbell II and Campbell III, the Wyoming Supreme Court retained jurisdiction and required the State to revise its school-finance and capital-construction systems. After a 2005 bench trial, the district court found substantial compliance on most operations-funding components but identified deficiencies involving maintenance and operations, vocational education, inflation, teacher-salary experience caps, regional cost adjustments, immediate-need facilities, and certain capital-construction standards. All parties appealed, and the cases were consolidated.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The capital-construction deficiencies and remaining facility inadequacies were to be addressed through case-by-case review and remediation under the statutory and regulatory framework. The State was also required to implement the regional cost-of-living adjustment consistently with the court's holding that salaries could not be reduced below the statewide modeled cost of hiring personnel.

CASES CITED

- State v. Campbell County School District, 2001 WY 19, 19 P.3d 518 (Wyo. 2001)
- State v. Campbell County School District, 2001 WY 90, 32 P.3d 325 (Wyo. 2001)
- Washakie County School District No. One v. Herschler, 606 P.2d 310 (Wyo. 1980)
- Campbell County School District v. State, 907 P.2d 1238 (Wyo. 1995)
- Sweetwater County Planning Committee for Organization of School Districts v. Hinkle, 491 P.2d 1234, 1236-37 (Wyo. 1971)
- Mullinnix LLC v. HKB Royalty Trust, 2006 WY 14, ¶ 12, 126 P.3d 909, 916 (Wyo. 2006)
- Horton v. Meskill, 172 Conn. 615, 376 A.2d 359 (1977)
- Montoy v. State, 279 Kan. 817, 112 P.3d 923, 929 (2005)
- DeRolph v. State, 83 Ohio St. 3d 1212, 699 N.E.2d 518, 519 (1998)
- Lincoln County School District No. One v. State, 985 P.2d 964, 967 (Wyo. 1999)
- Management Council of the Wyoming Legislature v. Geringer, 953 P.2d 839, 843 (Wyo. 1998)
- Natrona County School District No. 1 v. Ryan, 764 P.2d 1019, 1024-25 (Wyo. 1988)
- Natrona County School District No. 1 v. McKnight, 764 P.2d 1039, 1048 (Wyo. 1988)
- Wells Fargo Bank Wyoming, NA v. Hodder, 2006 WY 128, ¶ 59, 144 P.3d 401, 420 (Wyo. 2006)
- Campbell County School District v. Catchpole, 6 P.3d 1275, 1287 (Wyo. 2000)
- Snell v. Johnson County School District No. 1, 2004 WY 19, ¶ 5, 86 P.3d 248, 251 (Wyo. 2004)

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