

# **Bond Case Briefs**

*Municipal Finance Law Since 1971*

---

## **EDUCATION - WYOMING**

### **State v. Wyoming Education Association**

**Supreme Court of Wyoming - September 17, 2026 - P.3d - 2026 WL 2751927 - 2026 WY 99**

Teachers' association and several school districts brought declaratory judgment action against the state, challenging the constitutionality of the legislative funding model for public school operations and facilities, alleging that the model was not cost-based, was not adjusted for inflation, did not fund necessary innovations including elementary school counselors, school resource officers, nutrition services, and technology devices, and did not properly assess and fund school facilities, in violation of students' fundamental right to education and equal protection.

Following a bench trial, the District Court, Laramie County, ruled in favor of plaintiffs on all issues, declaring that the state failed to maintain a constitutionally-compliant school finance system for both operations and facilities, and retained jurisdiction pending compliance. The state appealed.

The Supreme Court held that:

- The record supported district court's conclusion that model salaries in the legislative public school funding model failed to reflect the true costs of recruiting and retaining qualified teachers and had created unconstitutional funding disparities between districts;
- Record supported district court's conclusion that the legislature did not properly adhere to the external cost adjustment process by considering and addressing the effect of inflation on public school funding, and thus failed to maintain a cost-based model as constitutionally required;
- Strict scrutiny applied to plaintiffs' claims that the legislature's funding of the components of a public education were not cost-based;
- Plaintiffs were not entitled to an order requiring the state to fund a one-to-one computer to student ratio, since this issue was neither pled nor tried by consent;
- Evidence did not support trial court's conclusion that school resource officers were essential to deliver the prescribed education program, meet state standards, or sustain defined measures of education quality;
- Evidence did not support trial court's conclusion that the state was constitutionally required to provide funding for school nutrition programs; and
- State's use of an administrative process was an adequate means of identifying and acting on educational suitability concerns.