BEARD LEGAL GROUP
EDUCATION LAW REPORT
Published in Cooperation with the Pennsylvania School Study Council, Inc.

Volume XII, Number 2 February/March 2017

Pennsylvania Federal Judge Rules Transgender Students Can Use Bathroom of Choice

On Monday, February 27, 2017, The United States District Court for the Western District of Pennsylvania ruled that the Pine-Richland School District must allow transgender students to use bathrooms that match their gender identity pending a final decision in the case.

The injunction will be in place until the Court rules on the District's new Restroom Policy.

United States District Judge Mark Hornak's ruling allows the District's students to use the bathroom in line with their chosen identity, not their assigned or anatomical sex.

In his Opinion, Judge Hornak detailed that the grant of relief ordered would cause little harm to the District and the High School community since the students were utilizing their choice of bathroom prior to the School District's enactment of the new policy.

Furthermore, the Court stated the Plaintiffs have set forth, without factual contradiction from the District, the actual, immediate, and irreparable harm that they are experiencing under the new bathroom policy.

Despite the most recent directives under the new Presidential Administration, the United States Supreme Court plans to hear the *G.G. ex rel. Grimm v. Gloucester Cnty. Sch. Bd.* case arising out of the 4th Circuit Court of Appeals in Virginia on March 28, 2017, which involved whether or not preventing students from the use of bathrooms corresponding to their gender identity violates Title IX.

NOTE: The Pennsylvania School Boards Association (PSBA) has posted Judge Hornak's February 27, 2017, Opinion and Order on its website.

Inside …

U.S. Supreme Court Remands Transgender Case Back to Fourth Circuit

On October 28, 2016, the Supreme Court agreed to consider the Fourth Circuit Court of Appeals case of *GG v. Gloucester County School Board*. *GG* involved a transgender boy who sought to use the boys' restroom at school. GG was challenging the school district's refusal to allow him to use the bathroom of the gender with which he identifies. The case went to the Federal District Court which rejected the student's claim of discrimination. Subsequently, the Fourth Circuit Court of Appeals determined that the trial court must defer to enforcing agency's (OCR) interpretation of the Statute but held for the time being the student would not be permitted to use the bathroom with which he identified. On March 28, 2017, the U.S. Supreme Court was to hear arguments from attorneys representing the school district and the ACLU representing the student.

On March 6, 2017, in a one sentence Order, SCOTUS, without reaching a decision, remanded the case back to the Fourth Circuit for further consideration. This is understood to be a result of the Trump Administration's recent decision to withdraw support for an Obama Administration directive to allow students to use a bathroom of the gender with which they identify.

As reported in a past issue of this firm's Newsletter, a Texas Appeals Court issued a nationwide injunction prohibiting the U.S. Department of Justice and Office of Civil Rights Compliance from enforcing the May 13, 2016, Guidance put out under the Obama Administration. Since then Fifth Circuit Court of Appeals issued a nationwide ban that prohibited the Department of Justice and OCR from enforcing the Guidance outlined in the Dear Colleague letter.

On February 22, 2017, President Trump directed the Department of Justice and OCR to issue a Guidance that in essence indicates that the Department of Education and Department of Justice are withdrawing the statements of policy and guidance reflected in two communications to school districts, the most notable being the Dear Colleague letter on transgender issues issued by the Civil Rights Division of the Department of Justice and Department of Education dated May 13, 2016. While this certainly has implications moving forward as it relates to the enforcement perspective from U.S. Government agencies, this does **not** in any way negate pending litigation across the nation wherein there are private complaints outlining violations of Title IX based on discrimination involving transgender students.

The most notable in Pennsylvania is that of *Pine-Richland*. Neither the U.S. Department of Education (OCR) nor the Department of Justice was involved in that case. However, that case is still alive and well. The case was argued on December 2, 2016, before Judge Hornak in the Western District Court of Pennsylvania. On February 27, 2017, Judge Hornak granted in part the Plaintiff's Preliminary Injunction permitting transgender students to use bathrooms in the High School consistent with their gender identities. In that case, three transgender students are seeking the Court to grant an injunction giving them permission to utilize bathrooms within the school district of the gender with which they identify. In addition, they are seeking general damages under Title IX.

Until the U.S. Supreme Court weighs in on this issue in the ensuing months, it would behoove school districts to maintain the status quo and not take any affirmative steps to change their policies, procedures or protocols as it relates to addressing issues of transgender students on a case-by-case basis.

All school districts, to include administrators and school board members alike, are encouraged to review the Pennsylvania School Boards Association's transgender legal update (February 22, 2017) as well as the *Pine-Richland* decision.

No matter what the ultimate outcome is in the *Pine-Richland* or the U.S. Supreme Court case of *Gloucester*, Title IX and related state statutes still protect school district students from discrimination, bullying, and harassment on the basis of their gender.

Student's Off-Campus Post Leads to Expulsion

AN is a 15-year-old student who attends school in Upper Perkiomen School District. The District sought to expel the student for his mash-up video of "Evan" and the song "Pumped Up Kicks" by the musical group Foster the People which describes a young man's homicidal thoughts. The "Evan" video was distributed by Sandy Hook Promise. The video itself is a public service announcement to help recognize the potential warning signs of teen gun violence. According to the Federal Complaint, the student's mash-up post involved only portions of the "Evan" video showing students in the gymnasium signing yearbooks. But then he overlaid the song "Pumped Up Kicks" to the clip where the screen faded to black after the silhouetted student entered the gymnasium and readied his semiautomatic rifle.

According to Court records (*AN v. Upper Perkiomen School District*, 2017 WL 85387 (E.D. Pa. 2017) Student AN and two of his friends created a private account on Instagram and named the account "upperperkiscool." The Student did not use his real name and he used an unknown child's photograph as his profile picture because he wanted the posts from the private Instagram page to remain anonymous. The followers of the private Instagram group were predominantly School District students.

On December 4, 2016, at approximately 8 p.m. AN used his personal device and his family's private home network to post the mash-up anonymously on the upperperkiscool Instagram page. The Student captioned the mash-up **"See you next year, if you're still alive."**

After the posting, some District students expressed concern the video was a threat. One of the students also privately messaged AN with concerns and asked whether the post was a "legit school shooting threat" to which he responded it was not a threat and then removed the video post from Instagram. The video was on Instagram for less than two hours but was viewed 45 times.

The parent of another student saw the Instagram post and notified the Superintendent. The parent of another student saw a screenshot that read "see you tomorrow." The parent said the screenshot post was "alarming" and called the Pennsylvania State Police over the matter. The State Police then contacted the Superintendent to indicate there was a threat against the school. As a result of the post, the Superintendent of Schools eventually called off school believing that there was a potential threat to the school.

The Pennsylvania State Police visited AN's home to investigate the situation and he and his parents willingly surrendered his personal phone and computer for forensic examination. The Police did not search those and eventually concluded that the student's actions did not satisfy the elements of a crime of terroristic threats and closed the criminal case against the student. Despite this, the School District informed Student AN that he could not enter school grounds or attend any school functions without the Administration's permission.

AN and his parents subsequently filed a complaint in Federal District Court outlining that the School District violated the student's right of free speech as guaranteed by the First and Fourteenth Amendments. Plaintiffs also filed an Emergency Motion for Preliminary Injunction to allow the student to return to school immediately, discontinue his suspension and prohibit the school district from pursuing a formal expulsion hearing. In considering the Injunction and Complaint before him, the Court looked at the various First Amendment cases. After reviewing numerous high profile free speech cases, the Court concluded that it can look to *Tinker* and the substantial disruption test that grew out of that decision. In *Tinker*, the U.S. Supreme Court stated "Schools may restrict speech that would materially and substantially interfere with the requirements of appropriate discipline in the operation of the school."

In working toward rendering its decision, the Court commented that the U.S. Supreme Court has never directly applied *Tinker* to a student's off-campus speech but outlined that other Circuit Courts of

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Off-Campus Post
Continued

Appeal have done just that. In analyzing the various cases on free speech, the Court in this case looked to *J.S. ex rel. Snyder v. Blue Mountain School District* and stated that the Third Circuit in that case assumed without deciding that *Tinker* applied to a student's off-campus speech.

In looking at the facts in this case, the Court actually concluded that the issue before the Third Circuit (unlike *Snyder* and/or *Layshock*) was not whether the student's off-campus speech caused a disruption to the school environment, so it did not apply *Tinker* in finding that the Student's off-campus speech was protected. In this case, the Court concluded that AN's speech caused actual disruption to the school environment, commenting that students, parents and school officials all reacted to the post. The Court also commented that police became involved and an innocent child who was mistakenly identified as the creator of the Instagram posting and his family were awoken in the middle of the night by police out of concern that he posted the threat. The Court also commented the morning after the post the School District was closed, buses in the school district were cancelled, and school district officials messaged all schools and parents of school district students of the closure.

The Court commented that, unlike in *Snyder*, where the Third Circuit Court of Appeals stated no one could or did take the content of the student's nonsensical social media profile seriously, people could, and in fact did, take the content of AN's post seriously. The Court commented, after being unable to discern whether to take the post seriously, the School District Superintendent was left with no other choice than to close school after consulting with State Police.

After looking at everything, the Court concluded that AN's post reasonably led the School District to forecast a substantial disruption of, or a material interference to, the school environment. The Court looked at the facts in *AN* and related them to a recent decision in the Federal Middle District Courts of Pennsylvania in the case of *RL v. Central York School District* wherein the Court in that case held that school officials did not violate a student's First Amendment rights when school officials suspended the student for creating a social media post outside of school that read: **"Plot twist, bomb isn't found and goes off tomorrow."** Applying *Tinker* in that case, the Middle District Court found that the student's speech actually caused a disruption and that it was reasonable for school officials to forecast a substantial disruption to the school environment due to the student's social media post.

In this case, AN argues that numerous people mischaracterized his speech and asserts that the School District's officials never actually saw his post and the decision to cancel school was not caused by AN's speech. In addressing same, the Court stated, "It is of no consequence that school officials never saw AN's post directly. In fact, there was no way for school officials to see the actual post, even after the fact, because AN deleted the post and the video from all sources in order to maintain his anonymity."

Before closing out the case, the Court addressed that although AN contends that his post was not a threat and was only intended to ridicule "Evan," AN's intent behind his post is not relevant in applying the *Tinker* standard to this case. The Court subsequently concluded AN's post reasonably led school officials to forecast that a substantial disruption to the school environment would occur. As such, the School District's discipline did not violate AN's First Amendment rights. Accordingly, AN has not met his burden of establishing the first element of the preliminary injunction test and the Court need not consider the other elements.

NOTE: This case is a Memorandum Decision and cannot be cited as precedent; however, the case in the Middle District (*RL v. Central York*) was a published decision and can be used as precedent. The case stands for the proposition that Courts will, in fact, consider threats made against schools to be serious, that the consequences for such actions can land students such as AN in hot water and, as in this case, result in expulsion from school.

Class Action Lawsuit is Filed Against Pennsylvania School District over Allegations of Contaminated Drinking Water in Elementary School

On February 7, 2017, a class action complaint was filed in the United States District Court for the Western District of Pennsylvania alleging that Butler Area School District permitted students to consume drinking water from two of its wells that contained lead levels approximately 200% to 300% higher than acceptable and safe standards. According to the Complaint, the Elementary School's water supply is drawn from two wells located on the property that proceeds through underground pipes to the school.

Shortly after August 15, 2016, the District received test results from an independent testing company which indicated both lead and copper levels exceeded acceptable water standards. According to a letter released by the District on January 20, 2017, the test results taken on August 15 and 29, 2016, respectively, showed lead levels in excess of 15 parts per billion in the samples taken. According to the letter from the Superintendent of Schools, levels in excess of 15 parts per billion are unacceptable and require the District to develop and implement an Action Plan.

The District's newsletter to parents and the community outlined that on September 27, 2016, the District's Maintenance Director contacted Pennsylvania's Department of Environmental Protection to review its obligations. DEP outlined the District's responsibilities under the Pennsylvania Lead and Copper Rules (LCR) to address the problem.

The Complaint alleges, despite having this information in its possession, the District failed to exercise reasonable care to protect invitees, to include students, against the danger and/or remediate the dangerous condition of the water. According to the Complaint, the School District did not notify students and/or their parents until on or about January 20, 2017, regarding their exposure to toxic levels of lead which existed over the course of the prior five months.

In the Superintendent's newsletter to parents, staff and the community regarding unacceptable lead and copper levels in the water at its Elementary School, the District outlined the steps taken to ensure that students, staff, parents and visitors do not drink or consume the water. The District outlined the following remedial steps:

1. All drinking fountains have been shut off and "bagged" in the Summit Elementary School.
2. Bottled water will continue to be provided throughout the building.
3. Hand sanitizer will be used in the bathroom.
4. All students, staff and visitors will be informed of the water quality issues and expressly told not to drink or consume in any form Summit Elementary School's well water, only bottled water.
5. Signs indicating that well water must not be consumed will be posted throughout the School.
6. Well water will only be used in toilets and urinals.

The District now has a specific time period to file a responsive pleading to the lawsuit in the form of a Motion to Dismiss and/or an Answer to the various averments within the Complaint.

The takeaway in regard to this situation is that whenever school districts are faced with a significant health and safety concern within the school setting, they should undertake prompt and immediate steps to notify staff, students, parents and community members of the situation and the corrective measures the District is pursuing to ensure the health, safety and welfare of those individuals in the building who may be exposed to such a situation.

Plumbing Prime Contract Case Gaining Traction

On October 26, 2016, by the Order of Court by Judge O'Reilly in Allegheny County, Pennsylvania, a decision was rendered regarding the implementation and provision of Section 751 of Article VII of the School Code (24 P.S. § 7-751) and the provisions of the Separations Act (71 P.S. 1618 and 53 P.S. § 1003) which requires separate prime contracts for work in plumbing, construction, heating and ventilation and electrical branches of construction.

As most school districts are aware, Section 751 outlines bidding requirements which requires all construction, reconstruction, repairs, maintenance or work of any nature, including the introduction of plumbing, heating and ventilation or lighting systems, upon any school building or any school property …be done under separate contracts. As stated, this provision requires that school districts bid out separate **prime** construction contracts when beginning a school construction project. The Order of the Court referenced above stated that the bid specifications and the contracts awarded in the building construction for West Jefferson Hills School District, violated Section 751 of the School Code and the Separations Act in that they failed to include in the prime plumbing contract all plumbing branch work up to and including any plumbing work performed outside the building, in the area between the building and where the exterior plumbing system made connection with the public sewer system, the water company's service lines or to a point of final disposition, which involved the installation of the sanitary sewer, the storm sewer and water service lines.

The Court found that the installation of sanitary sewers, storm sewers and water service lines in the exterior of a public building is in fact plumbing branch work that must be included in the contract awarded to the prime plumbing contractor. This holding came as a result of such work being defined as plumbing work under the International Plumbing Code, 2009 (IPC) which has been adopted in Pennsylvania as part of the Uniform Construction Code. 34 Pa. Code § 403.1.

To be clear, the District did allow a bid for a separate plumbing contract; however, it followed the typical standard for construction projects in which the general contractor would normally perform site utility work involving service lines, drains, sewers, etc. from five (5) to ten (10) feet outside the building and then the prime plumbing contractor would complete all other interior and exterior plumbing work.

While the decision was only at the Common Pleas level, School Districts should consult with their Architects, Engineers and Construction Managers in respect to any construction projects involving storm sewage, sanitary sewers and water service lines to consider whether the scope and assignment of this type of work should be changed from the general contractor to the plumbing contractor. Even though the cost to the District may not change, this scope of work modification may prevent claims by plumbing contractors as occurred in the West Jefferson Hills School District case. There, as a result of the Order, school district was ultimately forced to direct its construction manager to issue a change order transferring to the scope of work of the prime plumbing contractor all unfinished exterior plumbing work involving the installation of sanitary sewer, storm sewer and water lines and further directing the payment for such work shall be at the actual value of the work remaining.

The school district was also enjoined from awarding any future construction contracts that do not comply with the provisions of the Separation Act and/or the School Code. The lesson of this case is that all school districts that currently have construction projects underway or construction contracts pending should consult with their architects, engineers and/or construction managers to inquire if the bid specifications or scope of the work needs to be modified in the bid documents.

Court of Appeals Rules School District's Failure to Discuss Bullying at Child's IEP Impeded Their Participation in the IEP Process

L.K. was a third grade student who made progress throughout the school year and performed at/or approaching grade level in all subjects.

But sometime within the school year, her classmates bullied her so severely that she came home crying and complained to her parents on a daily basis.

The student was subjected to the following conduct at school from her classmates:

- Pinched hard enough to cause a bruise, had her toes stomped on
- Ostracizing her and backing away from her to avoid touching her
- Refusing to touch a pencil, treating it as contaminated, pushed the student away, tripped her, laughed at her and called her "ugly, stupid and fat"
- One student drew a demeaning picture of her and another made a prank phone call to her home
- One of her teachers did very little to stop the bullying, in fact after classmates refused to touch a pencil that she had touched, one of her teachers foolishly reinforced this bad behavior by labeling the pencil with the student's name because of the student's poor hygiene
- When the student was tripped the teacher berated her for making a scene

According to the parents, this bullying affected how their daughter's academic and non-academic development diminished, the father describing her as "emotionally unavailable to learn." The student was subsequently late to school 16 times in the spring semester alone due to her fear of interacting with her classmates.

One of her instructional teachers reported that the bullying affected her "ability to initiate, concentrate, attend and stay on task with her homework assignments and activities after school." According to the facts in this case, the parents made several attempts to raise the issue of bullying with the school but were consistently resisted. The parents requested copies of incident reports involving harassment of their daughter, wrote teachers about the bullying, and received no response. In the spring when they went to an IEP meeting, the parents attempted to raise the bullying issue but the school Principal, without explanation, refused to discuss the issue with them. At the end of the school year the parents tried a second time to raise the issue and once again school officials said it was inappropriate to consider when developing their daughter's IEP.

In response to same, the parents placed their daughter in a private school rather than go through another year of bullying.

In *T.K. and S.K. ex rel L.K. v. New York City Dept. of Educ.* (2nd Cir. 2016), the U.S. Court of Appeals for the 2nd Circuit stated the District made a fatal mistake when it informed parents of a third grade student with a learning disability that peer bullying was not an appropriate topic for discussion at the student's IEP meeting. According to the student's one-on-one Special Education Instructor, the student had difficulty concentrating and staying on task due to her classmates' verbal and physical harassment. Three of the student's instructors testified that the classmates constant teasing and exclusion from peer participation and other activities created a hostile environment. Evidence in the record showed that the student dreaded coming to school, was frequently tardy, and began carrying dolls for emotional support. Despite this, the student's IEP team denied the parents' request to discuss peer bullying at their IEP meeting. Circuit Court held that this refusal significantly impeded the parents' participation in the IEP process.

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Educator Misconduct Refresher Regarding Chief School Administrator Reporting Obligations and Requirements

Back in September 2014, PDE issued Basic Education Circular entitled "Educator Misconduct School Entity Mandatory Report Procedures and Form" addressing Section 2070.9(a) of the Public School Code (24 PS §2070.9(a)).

This note is intended as a refresher/reminder as to Chief School Administrator responsibilities and obligations under the law:

The chief school administrator or his or her designee must report to the Department of Education the following:

(1) Any educator who has been provided with notice of intent to dismiss or remove for cause, notice of nonrenewal for cause, notice of removal from eligibility lists for cause or notice of a determination not to reemploy for cause. The report shall be filed within 15 days after notice is provided by a school entity.

(2) Any educator who has been arrested or indicted for or convicted of any crime that is graded a misdemeanor or felony. For purposes of this section, the term conviction shall include a plea of guilty or nolo contendere. The report shall be filed within 15 days of discovery of the indictment, arrest or conviction.

(3) Any educator against whom allegations have been made that the educator has:

(i) committed sexual abuse or exploitation involving a child or student; or

(ii) engaged in sexual misconduct with a child or student.

The report shall be filed within 15 days of the discovery of the allegations of misconduct.

(4) Information which constitutes reasonable cause to suspect that an educator has caused physical injury to a child or student as a result of negligence or malice. The report shall be filed within 15 days of the discovery of the information.

(5) Any educator who has resigned, retired or otherwise separated from employment after a school entity has received information of alleged misconduct under this act. The report shall be filed within 15 days of the separation from employment, notwithstanding any termination agreement to the contrary that the school entity may enter into with the educator.

(6) Any educator who is the subject of a report filed by the school entity under the reporting requirements of 23 Pa.C.S. Ch. 63 (relating to child protective services). The report shall be filed within 15 days of the filing of the child protective services report.

(7) Any educator who the school entity knows to have been named as the perpetrator of an indicated or founded report of child abuse or named as an individual responsible for injury or abuse in an indicated or founded report for a school employe under 23 Pa.C.S. Ch. 63. The report shall be filed within 15 days of discovery of the child protective services report.

Failure to file the above information with the PDE Office of Chief Counsel within the prescribed time periods may result in disciplinary action against the Chief School Administrator.

Bullying *Continued from page 7*

Although the 2nd Circuit did not decide whether the failure to address bullying at the student's IEP meeting amounted to a substantive denial of FAPE (Free and Appropriate Public Education), the Judge writing for the three-Judge panel stated as follows: "Denying (sic) the parents the opportunity to discuss bullying during the creation of (sic) [the student's] IEP not only potentially impaired the substance of the IEP but also prevented them from assessing the adequacy of their child's IEP.

Lesson learned: When faced with these types of situations, District personnel at IEP meetings need to raise and actually address the problem facing the student. This can include developing goals, Specially Designed Instruction (SDI), or addressing it within the student's Positive Behavior Support Plan in an effort to address these concerns. Because school officials told the parents that bullying was

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Is Your School Team Ready for the New Guidance Regarding ADHD?

On July 26, 2016, the Office of Civil Rights released its Dear Colleague Letter and Resource Guide on Students with ADHD. Subsequent to that, effective October 11, 2016, Amended Title II ADA Regulations went into effect. https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201607-504-adhd.pdf

OCR has been concerned over the years that many schools have had a tendency to overlook issues with students with ADHD. All Special Education Departments and/or individuals responsible for 504 Plan administration need to review the Dear Colleague Letter and its guidance regarding ADHD. OCR's new ADHD Guidance states, the Agency will assume, "unless there is evidence to the contrary," that a student who has an ADHD diagnoses is impaired under 504. It is recommended that schools provide in-service training as it relates to OCR's recent Resource Guidance to include fact sheets and warning signs regarding ADHD. Some signs are as follows:

- Considerable restlessness or inattention inappropriate for the student's age and grade level.
- Trouble organizing tasks and activities.
- Communication or social skills deficits.
- Certain behaviors associated with ADHD may lead to more disciplinary referrals.

School Districts need to be mindful that a medical diagnosis alone does not automatically ensure a student has a disability under 504. School Districts are still obligated to conduct an individualized assessment for each student.

One of the big "urban legends" that still seems to create an obstacle in school districts is that some School District personnel still believe a student has to have a medical diagnosis before the student can be diagnosed with ADHD and fall under the accommodations of Section 504 or under the IDEA under the Other Health Impaired category.

According to the Office of Special Education Programs (OSEP) a medical diagnosis may not even be necessary as part of the special education evaluation process under IDEA or Section 504 in order to receive services.

School District personnel are encouraged to familiarize themselves with the new Dear Colleague Letter and Resource Guide on Students with ADHD as well as the new Title II Regulations. Please encourage your staff to refer to the new list of conditions that the Department of Justice presumes to be impairments under the ADA. The new impairments on the list are as follows: Dyslexia, ADHD, Specific Learning Disabilities. The IDEA includes 13 disability categories: autism, deaf-blindness, deafness, emotional disturbance, hearing impairment, intellectual disability, multiple disabilities, orthopedic impairment, other health impairment, specific learning disability, speech or language impairment, traumatic brain injury, and visual impairment including blindness. 34 C.F.R. § 300.8(c).

A large number of cases addressing Other Health Impaired (OHI) classification under the IDEA encompass students with ADHD. A medical diagnosis of ADHD does not automatically confer OHI eligibility. Students may be eligible for special education services or specially designed instruction if their condition causes (a) limited alertness to educational environment; (b) adversely affects their educational performance; and (c) the student requires special education services.

Bullying *Continued*

not appropriate for discussion at the IEP meeting, District personnel impeded the parents' participation in the IEP process. A review of this case shows that the District's decision in this case, by refusing to discuss the educational impact of the student's social exclusion and physical injuries resulted in the District paying for a full year of private schooling after the parents removed the student to a private placement.

Beard Legal Group Education Law Focus

As solicitors, labor counsel and special counsel, Beard Legal Group represents more than 80 School Districts in Pennsylvania. The Firm has successfully negotiated hundreds of teacher and support staff contracts.

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The Pennsylvania School Study Council (PSSC), a partnership between the Pennsylvania State University and member educational organizations, is dedicated to improving education by providing research information, professional development activities, and technical assistance to enable its members to meet current and future challenges. The PSSC offers professional development to the membership through colloquiums, workshops, study trips, consultation, publications, and customized services. For more information, visit the PSSC website, www.ed.psu.edu/pssc/ or contact the Executive Director Dr. Lawrence Wess at ljw11@psu.edu.

Subsequent Issues

If you have a school law question or topic you would like to have addressed in subsequent issues of the newsletter, please send an email to:

Carl P. Beard*	*cbeard@beardlegalgroup.com*
Elizabeth Benjamin*	*ebenjamin@beardlegalgroup.com*
Ronald N. Repak*	*rrepak@beardlegalgroup.com*
Brendan J. Moran	*bmoran@beardlegalgroup.com*
Jennifer L. Dambeck	*jdambeck@beardlegalgroup.com*
Carl Deren Beard	*cdbeard@beardlegalgroup.com*
Jon Higgins	*jhiggins@beardlegalgroup.com*

*Partner

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Education Law Report is published by Beard Legal Group, P.C.

BEARD
LEGAL GROUP

MAIN OFFICE:
3366 Lynnwood Drive P.O. Box 1311
Altoona, PA 16603-1311
814/943-3304 FAX: 814/943-3430
www.beardlegalgroup.com