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Supreme Court is Poised to Issue a Decision on Fair Share Fees

The United States Supreme Court heard argument in February on *Janus v. AFSCME*. A decision is expected in the very near future and will affect all public sector employers who are collecting and remitting fair share fees to unions.

Please keep in mind if the U.S. Supreme Court rules that the collection of fair share fees is unconstitutional, then the deduction of such fees must stop immediately.

As we understand it, the decision will be effective the date it is issued and fairshare fee/deductions must cease immediately if the Court says they are unconstitutional and cannot be withheld or otherwise collected.

Please note that the deduction of membership dues will not be impacted by the U.S. Supreme Court's decision and Union/Association membership fees would continue to be deducted from employee paychecks.

School Boards Not Entitled To Qualified Immunity In Free Speech Suit

A panel of three judges on the United States Court of Appeals for the Third Circuit, in the case of *Barna v. Board of School Directors* of the *Panther Valley School District*, recently ruled that a Pennsylvania school board was not entitled to qualified immunity in a free speech lawsuit brought by a concerned citizen who had been previously banned from attending school board meetings.

In April 2010, John Barna attended the Panther Valley School District meeting to discuss a contract that Mr. Barna believed to be a waste of public resources. At that meeting, and at one other meeting that same month, Mr. Barna became combative and argumentative, making comments that others perceived to be as threats toward the school board. The culmination of these two events led Panther

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Inside …

Federal District Court In Virginia Upholds Transgender Student's Right to Use the Bathroom That Aligns With His Gender Identity

On May 22, 2018, United States District Court for the Eastern District of Virginia ruled on the long awaited *Gavin Grimm v. Gloucester County School District* case.

In *Gloucester*, as in *Pine-Richland,* the Board of School Directors felt compelled to act on a proposed policy addressing restroom use. Among other things, the *Gloucester* Policy stated "it shall be the practice of GCPS to provide male and female restroom and locker room facilities in its schools, and the use of said facilities shall be limited to the corresponding biological genders, and students with gender identity issues shall be provided an alternative appropriate private facility." Subsequent to passage of the Policy, the student was informed he could no longer use the boys' restrooms. The District then installed three single-user restrooms, none of which were located near the student's classes.

In July 2015, Mr. Grimm filed suit alleging that the Board's Policy of assigning students to restrooms based on their biological sex violated Title IX of the Educational Amendments of 1972, as well as the Equal Protection Clause of the 14th Amendment to the United States Constitution. In September 2015, another Judge of the Eastern District issued a Memorandum and Order dismissing Mr. Grimm's claim under Title IX for failure to state a claim and denying his Motion for Preliminary Injunction based on the alleged Title IX and Equal Protection Clause violations.

An Interlocutory Appeal of those decisions followed, leading to appellate review by the United States Court of Appeals for the Fourth Circuit, and by the United States Supreme Court.

As many readers will recall, on October 28, 2016 Beard Legal Group issued a Client Alert outlining that the United States Supreme Court announced it would hear the Grimm case arising out of the Fourth Circuit Court of Appeals in Virginia. At that time it was reported the Fourth Circuit Court of Appeals held in a 2-1 vote that refusing to allow students to use bathrooms corresponding to their gender identity would violate Title IX, a law that bans sex discrimination by schools receiving federal funding. Ultimately the United States Supreme Court refused to hear the case remanding it back to the Fourth Circuit Court of Appeals that ultimately remanded it back to the United States District Court for the Eastern District of Virginia.

It needs to be noted as the legal bantering continued, Mr. Grimm filed an Amended Complaint and the School Board filed another Motion to Dismiss. First order of business for Judge Arenda L. Wright Allen in this case was to deal with the issue of the previous Interlocutory Order that had been issued by the Eastern District. In this case the Judge held that she was not bound by the prior Order given the significant change in the applicable law since the Motion to Dismiss the Title IX claim was initially considered in 2015. The Judge then looked to the Sixth and Seventh Circuit Courts of Appeals wherein the Courts had held that excluding boys and girls who are transgender from the restrooms that align with their gender identity may subject them to discrimination on the basis of sex under Title IX, the Equal Protection Clause, or both. The Judge then turned to cases in Pennsylvania *A.H. by Handling v. Minersville Area Sch. Dist.* and *Evancho v. Pine-Richland Sch. Dist.,* as well as a case that recently came out the Federal District Court in Maryland. The Court concluded that revisiting the question of whether Mr. Grimm has stated a plausible Title IX claim is warranted.

The Judge then looked to other Circuit Courts of Appeals in regard to the nexus between Title IX and

Title VII. Judge Arenda L. Wright Allen stated the First, Second, Third, Seventh and Ninth Circuit Courts have all recognized that based on the logic of *Price Waterhouse*, a gender stereotyping allegation generally is actionable sex discrimination under Title VII. The Judge opined that although the Fourth Circuit has yet to apply *Price Waterhouse* expressly to Title VII claims brought by transgender individuals, her Court would join the District of Maryland in concluding that "discrimination on the basis of transgender status constitutes gender stereotyping because by definition, transgender persons do not conform to gender stereotypes." Once again looking to other Circuits the Judge noted that the First, Sixth, Ninth, and Eleventh Circuits have held that based on the logic of *Price Waterhouse*, discrimination on the basis of transgender status is per se sex discrimination under Title VII or other federal civil rights statutes and the Equal Protection Clause. Accordingly, the Judge held that allegations of gender stereotyping are cognizable Title VII sex discrimination claims and, by extension, cognizable Title IX sex discrimination claims.

The Court then turned to whether Mr. Grimm had sufficiently pled a Title IX claim. [The Judge concluded that Mr. Grimm properly alleged discrimination on the basis of sex, finding the second pleading requirement is met because GCPS and Gloucester High School "are education programs receiving Federal financial assistance." The Court then turned to determining whether Mr. Grimm has sufficiently alleged that the discrimination harmed him]. The Judge stated after full consideration of the facts presented and the compelling scope of relevant legal analyses, that Mr. Grimm sufficiently pled a Title IX claim of sex discrimination under a gender stereotyping theory.

In *Grimm*, the Court also gets into a detailed analysis as to arguments that have been raised relative to protecting other persons' privacy rights and demonstrates that this is not a valid consideration for upholding the School District's Policy. In the end, the Judge wrote "[for] these reasons, the Court concludes that Mr. Grimm has sufficiently pled that the Policy was not substantially related to protecting other students' privacy rights, because there were many other ways to protect privacy interests in a non-discriminatory and more effective manner than barring Mr. Grimm from using the boys' restrooms. The Board's argument that the policy did not discriminate against any one class of students is resoundingly unpersuasive. Accordingly, the Court declines to dismiss his Equal Protection Claim." Judge Allen then entered an Order dismissing the School District's Motion to Dismiss as moot; and ordered a settlement conference within the next thirty (30) days.

Observation: It is becoming increasingly clear that the Courts across the United States are aligning on this particular issue. While the jury is still out in the Third Circuit based on the *Boyertown* decision, it is clear that all of the Federal District Courts in Eastern, Middle, and Western Pennsylvania are consistent in their rulings that any type of policy that would require students to use a bathroom of their birth gender will not prevail within the jurisdictional boundaries of the Commonwealth of Pennsylvania.

Presentations

- On April 8, 2018 Attorney Beard presented at the National School Boards Association on the topic of "Fundaments of Special Education: What Every School Board Member Needs to Know." The seminar was attended by approximately 250 to 300 school board members and administrators from across the United States.

NOTE: Anyone wishing to get a copy of that presentation please contact Regina Fisher at rfisher@beardlegalgroup.com.

- On May 11, 2018 Attorney Beard presented at the 46th Annual Special Education Law Conference at Lehigh University on the topic of "Transition across a student's education from elementary age to high school with specific emphasis on skills related to a student's work environment." The seminar was attended by parents and special education administrators.

Federal Eastern District Judge Denies Injunction Request of Students Seeking to Enjoin Transgender Students from Using Restroom with Which they Identify

As we reported in the August 2017 edition of the Education Law Report, a Motion for the Preliminary Objections in the *Boyertown Area School District* case was set for oral argument on August 11, 2017.

On August 25, 2017, Judge Edward G. Smith ruled transgender students in the *Boyertown Area School District* are still allowed to use bathrooms and locker rooms that correspond with their gender identity.

Judge Smith developed an expansive record of testimony in the multiple hearings that have been held with testimony from students and experts on the issue.

The plaintiffs sought a preliminary injunction that would have banned transgender students in the District from using bathrooms and locker rooms that correspond with their gender identity.

Judge Smith had been adamant in ruling on the request before students returned to school on Monday, August 28. The lawsuit remained active, but transgender students were assured by the fact that a federal judge ruled in their favor as they attended daily classes. In ruling against the student plaintiffs, Judge Smith essentially decided they are unlikely to be successful on the merits of the Section 1983 Constitutional privacy claims, Title IX claims, and their state claims for invasion of privacy at the conclusion of the trial. Judge Smith also had to account for any irreparable harm the plaintiffs may face if the preliminary injunction was not granted. Because the Court decided that plaintiffs had not established a likelihood of success on the merits or any irreparable harm, the Court did not analyze the question of whether granting the preliminary injunction would cause greater harm to the defendants or whether the injunction would be in the public interest, as is customary.

The March 2017 lawsuit came a few weeks after the Trump administration rescinded Obama-era regulations that had instructed schools to allow students to use bathrooms and locker rooms in line with their expressed gender identity rather than their sex assigned at birth. With the Obama regulations rolled back, it is now up to the states to interpret anti-discrimination laws when deciding how students can use school facilities.

In the August edition of the Education Law Report, where we also discussed the *Pine-Richland* transgender case, it was reported both the Federal District Court in Western Pennsylvania as well as the Federal District Court in Eastern Pennsylvania upheld rights of transgender students to use bathrooms or locker rooms that correspond with their gender identity. *Boyertown* comes on the heels of the Seventh Circuit Court of Appeals decision in *Whitaker v. Kenosha Unified Sch. Dist*, No. 16-3522 (7th Cir. May 30, 2017) which temporarily stopped that district from enforcing a policy requiring students to use the restroom of the biological sex that they were assigned at birth.

Boyertown was appealed to the Third Circuit Court of Appeals on a narrow issue. On May 24, 2018, a panel of Circuit Judges led by Theodore A. McKee announced an extremely rare ruling from the bench 30 minutes after oral argument concluded.

"We agree Plaintiffs have not demonstrated a likelihood of success on the merits and that they have not established that they will be irreparably harmed if their Motion to Enjoin the Boyertown School District's policy is denied. We therefore Affirm the District Court's denial of a preliminary injunction substantially for all the reasons that the Court explained in its exceptionally well-reasoned Opinion of August 25, 2017. A formal Opinion will follow. The mandate shall issue forthwith. The time for filing a petition for rehearing will run from the date that the Court's formal opinion is entered on

the docket."

This Decision should make it clear to School Districts in the 3rd Circuit and across the State of Pennsylvania that Transgender Policies should be inclusive of students' gender identities. Further, Districts should not prevent transgender students from using the restroom or locker room of their choice. The Western District, Middle District and Eastern District of Pennsylvania, along with the 3rd Circuit Court of Appeals have all recently made or upheld decisions in favor of transgender students and their right to use the restroom or locker room of their choice.

While more cases will undoubtedly continue to unfold as the months progress, it is still the position of both the Pennsylvania School Boards Association and the National School Boards Association that school districts do offer accomodations to students and review each matter on a case-by-case basis.

Supreme Court Will Not Hear Title VII Claims Regarding Anti-Gay Bias

The United States Supreme Court recently declined to review *Evans v. Georgia Regional Hospital*, 850 F.3d 1248 (2017), an 11th Circuit case affirming the dismissal of a lesbian security guard's lawsuit alleging her employer violated Title VII by firing her over her sexuality.

Whether Title VII bars anti-gay bias has been an open question that has recently been attempted to be answered by a few Federal Circuits in the United States. Earlier this year, the 7th Circuit broke with precedent to find an Indiana professor could allege her employer discriminated against her because she is a lesbian. Previously, in every other Circuit that considered Title VII of the Civil Rights Act of 1964 found the law did not cover discrimination based on sexual orientation. However, several Circuits have recognized claims of discrimination and/or harassment on the basis of sexual orientation as establishing claims of sex discrimination based on sex stereotypes.

Ms. Evans, the employee at the center of the 11th Circuit lawsuit, and her attorneys still remain optimistic about their next steps. Ms. Evans' attorney, Gregory Nevins, was quoted as saying, "A denial of *certiorari* doesn't mean anything on the merits."

Ms. Evans and her legal team may be encouraged by a case in the 2nd Circuit facing the same issue. That case features a former skydiving instructor whose estate alleges he was fired illegally because of his gay lifestyle. Plaintiffs in these cases suggest three rationales for a finding that Title VII blocks employers from discriminating against gay workers: (1) that it treats employees who date members of the same sex differently than it does employees who date members of the opposite sex; (2) that it treats workers differently based on the sex of those they date; and (3) that it punishes gay workers for failing to meet the stereotype that they date members of the opposite sex.

Plaintiffs often rely on a 1989 United States Supreme Court Ruling in *Price Waterhouse v. Hopkins*, 490 U.S. 228 (1989) that ruled Title VII bars employers from discriminating against workers who don't fit sexual stereotypes. For instance, women who dress in garb traditionally reserved for men, or vice versa, or men and women who have mannerisms that are typically associated with the opposite sex, cannot be discriminated against simply because their behaviors do not fit sexual stereotypes.

The 7th Circuit Opinion in *Hively v. Ivy Tech Community College* noted the "common sense reality that it is actually impossible to discriminate on the basis of sexual orientation without discriminating on the basis of sex persuades us that the time has come to overrule our previous cases that have endeavored to find and observe that line." The 7th Circuit also

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Anti-Gay Bias *continued from page 5*

cleverly relied on the United States Supreme Court's ruling in the 1967 case, *Loving v. Virginia*, 388 U.S. 1 (1967) which found that laws barring intermarriage of different races violated the Constitution's Equal Protection clause.

Because changing the race of one partner in the marriage would change the legality of the union according to *Loving*, it is parallel to changing the sexual preference of one partner in order to fit within the confines of Title VII and its limitations on sexual discrimination.

While it is generally odd for the United States Supreme Court to deny *certiorari* when two Circuits are split on an important federal question as they are here, the Court may be biding its time for the Circuits to flush out other legal issues regarding Title VII and discrimination based on sexual orientation. It is possible the United States Supreme Court is waiting on their decision and for other Circuits to weigh-in before establishing precedent by hearing a case of their own. It is also possible that Congress will pass legislation that clarifies the scope of Title VII and does not rely on Circuit Courts to interpret the language that lacks explicit guidance on sex-based discrimination and the limits of it. In addition to a Circuit split on the case, amici briefs have also pitted the Department of Justice and the Equal Employment Opportunity Commission against each other regarding how Title VII should be interpreted. The EEOC recently obtained a victory in the United States District Court for the Western District of Pennsylvania. The EEOC represented a telemarketing employee of Scott Medical Health Center in Pittsburgh who claimed he quit because of sexual orientation discrimination.

It is also important to note that the law in the 3rd Circuit, covering Pennsylvania, Delaware, and New Jersey, remains that Title VII does not cover discrimination based on sexual orientation. That decision has held up since it was heard in 2001 in *Bibby v. Philadelphia Coca-Cola Bottling Company*. Despite this 2001 decision by the 3rd Circuit in *Bibby*, its application has been called into question by *EEOC v. Scott*, decided in November 2016 in the Western District of Pennsylvania.

On February 26, 2018, the 2nd Circuit Court of Appeals, in *Zarda v. Altitude Express*, extended Title VII protections to sexual orientation.

The 8th Circuit Court of Appeals, in the case of *Horton v. Midwest Geriatric Management, LLC*, is poised to be the most recent Circuit Court of Appeals to consider weighing in on whether Title VII bars sexual orientation discrimination. A decision is expected in the very near future.

As this issue works toward final resolution in the courts or Congress, employers must remain cognizant of obligations not to discriminate on the basis of sex, including sexual stereotypes. Stay tuned for future newsletters that will track these cases and when the Supreme Court or Congress may decide to speak out on the issue finally and for all.

Free Speech Suit *continued from page 1*

Valley Superintendent Rosemary Porembo to write a letter to Mr. Barna to inform him that he could not attend future school board meetings if he was going to engage in threatening or disorderly conduct. After the letter, Mr. Barna attended several board meetings without incident until October 2011.

On October 12, 2011, Mr. Barna raised his voice and become confrontational after he was denied the opportunity to ask questions on an agenda matter. The school board President, Jeffrey Markovich, stood up in response to Mr. Barna's confrontational demeanor, which Mr. Barna apparently interpreted as an invitation to fight. Despite offering apologies to some board members, Solicitor Robert Yurchak sent Mr. Barna a letter barring him from attending all board meetings or school extracurricular activities because his conduct had become "intolerable, threatening and obnoxious," and because he was "interfering with the function of the school board." While Mr. Barna was barred from attending in person, he was permitted to submit reasonable and responsible written questions to the board which would be answered in a timely manner.

Mr. Barna testified that he did not submit any written questions because the school board's actions to eject him from meetings discouraged him from participating in public discussion. Mr. Barna filed suit, naming as defendants the Panther Valley School Board and individual board officials alleging violations of the First Amendment right to free speech and violations of the First and Fourteenth Amendment rights to be free from unconstitutional prior restraint. More than three and one-half years after initially filing this lawsuit, the United States District Court for the Middle District of Pennsylvania granted summary judgment in favor of both the Panther Valley School Board and the individual school board officials. Despite the District Court determining that the categorical ban on Mr. Barna's attendance was unconstitutional, the Court concluded that all of the defendants were entitled to qualified immunity because the right to participate in school board meetings, despite engaging in patterns of threatening and disruptive behavior, was not "clearly established" at the time of the disruptions. Mr. Barna's appeal to the Third Circuit centered on the Court granting the individual board members and Panther Valley School Board qualified immunity.

A defendant sued under 42 U.S.C. §1983 is entitled to qualified immunity "unless it is shown that the official violated a statutory or constitutional right that was 'clearly established' at the time of the challenged conduct." A right is "clearly established" when it is "sufficiently clear that a reasonable official would understand that what he is doing violates that right."

The Third Circuit Court of Appeals had twice upheld the temporary removal of disruptive participants from a limited public forum like a school board meeting. However, neither case squarely addressed the constitutionality of a categorical and permanent ban proscribing all future expression in a limited public forum. Mr. Barna was similarly unable to cite precedence addressing the specific issue at hand. Therefore, the Court concluded that there was, at best, disagreement in the Courts of Appeals as to the existence of a clearly established right to participate in school board meetings despite engaging in a pattern of threatening and disruptive behavior. Accordingly, the Court of Appeals for the Third Circuit affirmed the District Court's grant of summary judgment in favor of the individual board members on the basis of qualified immunity.

However, the Court of Appeals for the Third Circuit still had to determine whether qualified immunity was properly granted to the board as a whole. The United States Supreme Court, in *Owen v. City of Independence,* 445 U.S. 622 (1980), held that municipalities do not enjoy qualified immunity from suit for damages under 42 U.S.C. §1983. Thus, the U.S. District Court for the Middle District of Pennsylvania overlooked the Supreme Court's precedent and improperly awarded qualified immunity to the board as a whole. Despite some issues with Mr. Barna's procedural and timely handling of the appeal regarding qualified immunity granted to the Board as a whole, the Court of Appeals for the Third Circuit decided it was better not to punt on a pure question of law for procedural issues. Given the importance of the question and the exceptional circumstances to excuse Mr. Barna's procedural error, the Court of Appeals for the Third Circuit ultimately held that the District Court was legally incorrect when granting judgment in favor of the defendant school board on the basis of qualified immunity. Because the issue of qualified immunity from a municipal entity was so well settled, the Court of Appeals for the Third Circuit had little choice but to grant Mr. Barna's appeal in part and deny qualified immunity for the school board as a whole.

Take Away: This case is yet another demonstrating that before an individual is barred from permanently attending future board meetings, legal counsel should be consulted as to the legal implications regarding

Philadelphia Court of Common Pleas Judge awards $500K to the family of a female student who is regularly bullied at three schools within the Philadelphia School District

Judge Gene Cohen in a non-jury trial found for the family after a three week trial. Judge Cohen ruled that this school district's conduct towards the child and failing to remedy the ongoing reports of bullying and harassment, rose to the level of deliberate indifference and violated the Pennsylvania Human Relations Act which prohibits sex discrimination. According to the Court's decision containing findings of fact and conclusions of law, the student was first bullied, taunted and teased while in elementary school. Despite reports by the parent, the situation did not remedy itself and according to the Judge the school district had no procedure to remedy the discrimination. The student transferred to a new school for sixth grade. The conduct continued in the new school and the mother transferred her daughter mid-year to another new school within the district. According to the findings of fact, the parent once again had reported the situation to administrative staff and the response to the situation appeared to be non-existent. Judge Cohen found again that the school was deliberately indifferent to the discrimination and the bullying suffered by the student. The student ultimately graduated to high school where the same conduct that she experience in elementary and middle school continued. According to the record the district was unable to remedy the situation and the parent ultimately removed her child to a cyber charter school.

Judge Cohen conducted an extensive hearing over a three week period of time and ultimately rendered a decision containing 60 findings of fact and approximately 21 conclusions of law.

According to the Judge, the District's Anti-Bullying policies in place throughout the student's time in its schools did not address student on student sexual harassment to which the student was subjected. According to the Judge school staff responsible for overseeing the student's safety and wellbeing were not even aware of the policies that were supposed to be in place or procedures to implement those policies. As a result, the student suffered numerous medical conditions to include depression and anxiety.

In the conclusions of law portion of his decision, the Judge wrote "Student on student sexual harassment, bullying based upon gender presentation met with deliberate indifference by school administrators is a violation of the Pennsylvania Human Relations Act because it is discrimination based upon sex." The Judge indicated the school district was liable to the student for discrimination under the PHRA because the school was deliberately indifferent to the discrimination suffered by the student.

Judge Cohen found the procedures for dealing with student on student sexual harassment were non-existent and that the district was repeatedly given verbal and written notice of the harassment the student was receiving and therefore it had actual knowledge of harassment. As a result, the Judge determined that damages from humiliation and mental anguish were available to the student and parent under the Pennsylvania Human Relations Act. Accordingly, the Judge awarded Plaintiffs damages in the amount of $500k plus attorney's fees and costs. It is believed that this ruling by Judge Cohen is the first time a state court in Pennsylvania has recognized a cause of action under the Pennsylvania Human Relations Act for student on student bullying/harassment.

The Pennsylvania School Study Council, Penn State Law, Penn State College of Education, and the Partners of Beard Legal Group invite you to join us for

Education Law Day:
A Cafeteria of Legal Experts and Topics
Tuesday, September 25, 2018
8:30 a.m. – 4:00 p.m.
At Penn State Conference Center
University Park, Pennsylvania

Introduced by Dr. Lawrence Wess
Executive Director of the Pennsylvania School Study Council
And
David A. Moak, Dean, College of Education

Coordinated by Beard Legal Group – Speakers and topics include:

Dr. David Bateman, Author and Professor of Special Education at Shippensburg University

- Tips for Communicating With Parents

Carl P. Beard, Managing Partner

- "Schools in Crisis; Dealing With Dangerous and Aggressive Students"

Elizabeth Benjamin, Partner and Ronald N. Repak, Partner

- Administrators Carrying Guns
- SROs/Schools Police Officers/School Security Officers - Oh My!
- Searches of Student and Staff
- Student Threats in and Out of the School Setting
- Suicide Hotline Issues

Ronald Cowell, Executive Director of Education Policy and Leadership Center

- Mr. Cowell will speak about the current education finance situation and the challenges to schools

"Ask the Solicitors" session to allow discussion on topics as requested by participants.

For further information or to register, contact Lawrence Wess at Ljw11@psu.edu or 814-330-6312.

Directions and information will be sent to the all registrations.
Open parking is available at the Penn Stater Conference Center.

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.

The Firm also represents a large area of the State for coverage of school board directors through their insurance carrier.

Our legal expertise includes: Solicitorship Services, Collective Bargaining – Teacher and Support Contracts, Employment Matters, Labor Arbitrations, Special Education Issues and Proceedings, Defense of Tax Assessment Appeals, PHRC/EEOC Complaints, Student Expulsion Hearings and Constitutional Issues.

About the Pennsylvania School Study Council

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:

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