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School Law Review

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Search and Seizure: The Fourth Amendment in Schools

Two recent (2016) court cases, both in the 11th Circuit, addressed the constitutional rights of students at school or school-sponsored events. The first case, from Georgia, hinged upon the reasonableness of a strip search. The events of the second case, regarding the Fourth Amendment and the doctrine of qualified immunity, took place at a junior/senior prom in Florida.

Fourth Amendment

The right of the people to be secure in their persons … against unreasonable searches and seizures, shall not be violated…

Strip Search for Marijuana

A seventh-grade student, D.H., was subjected to a strip search after school administrators had searched three other students and found marijuana on two of them. One of those three students told administrators that D.H. also had marijuana, which prompted the strip search, even though another one of those three students insisted that D.H. did not have any marijuana.

D.H. was called into the school deputy's office, where the deputy and the assistant principal were present, along with the three other students who had been previously searched. McDowell, the assistant principal, instructed D.H. to take off his shoes, empty his pockets, and take off his pants. Next, McDowell instructed him to remove his socks and shirt. According to D.H., when McDowell finally instructed him to remove his underwear, D.H. asked for the search to be conducted in the restroom. McDowell denied the request, stating that he had to perform the search in front of the deputy. D.H. then lowered his underpants to his ankles. No marijuana was found on D.H., and his mother sued the administrators, the school resource officer, the school district, and others, alleging the strip search violated her son's rights.

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A federal district court granted summary judgment to the school district and qualified immunity to most of the officials, but it held that McDowell had "violated **clearly established** constitutional law" – D.H.'s Fourth Amendment rights.

McDowell appealed to the 11th Circuit. The appeals court looked to a two-prong test – *inception* and *scope* – established by the U.S. Supreme Court to determine whether a school search is constitutionally reasonable. First, the search must be "justified at its inception," meaning the school official has reasonable grounds to suspect that evidence will be found that the student has violated the law or school rules. Second, the scope of the search must be "reasonably related to the circumstances which justified the interference," that is to say, reasonably related to the objectives of the search and not excessively intrusive considering the student's age and sex and the nature of the infraction.

To determine whether a school search is constitutionally reasonable, courts look to a two-prong test: inception and scope. The search must be "justified at its inception," and the scope must be reasonably related to the objectives of the search.

Although students have a lesser expectation of privacy than the general public, they still retain a certain expectation of privacy in their "persons." A highly intrusive search that requires students to expose their private parts is a "serious intrusion upon the students' personal rights" and therefore warrants a "truly important interest."

Under McDowell's version of events, McDowell asked D.H. only to pull out the waistband of his underpants and that D.H. did so; however, because the administrators were seeking immunity, the court was required to review the facts in the light most favorable to D.H. (Note: Regardless of whose statement is true – D.H.'s or McDowell's – both accounts would be considered a strip search, although McDowell's account would be far less invasive.) Also, McDowell admitted later that he could have moved the search to the restroom for the sake of privacy and still had the deputy present.

The court also considered whether clearly established law existed to inform McDowell on how to perform the search. According to D.H.'s version of events, which the appellate court was required to hold to, clearly established law does exist. The court held that a "reasonable official" in McDowell's position would not have believed that it was lawful to require D.H. to strip naked in front of his peers, considering the nature of the infraction and the student's age and sex.

In its July 29 decision, the 11th Circuit court found that McDowell's strip search of D.H. was justified at its inception but unconstitutionally excessive in scope. At its inception, the search was justified because other students had been hiding marijuana, including one in his underpants, and because a student had implicated D.H. But as alleged by D.H. – with completely lowered underpants and in front of several other people – the execution of the search was not reasonable and therefore was unconstitutional. Furthermore, clearly established law exists to inform an official that requiring D.H. to strip fully naked in front of peers was unreasonable. The court upheld the denial of immunity for McDowell and remanded the case to district court for trial.

Prom Night Party

In anticipation of their junior/senior prom, Jensen Beach High School students had signed "zero-tolerance forms" acknowledging that no drugs or alcohol were permitted at the prom and that they may be subject to a breathalyzer test if a school official suspected that they were under the influence of alcohol. The night of the prom, a group of about 40 students rented a prom bus and went to a local park for pictures and then to dinner. Finally they arrived

at the prom location at about 10:15 p.m. – 15 minutes after the cutoff time to arrive. Instead of keeping them out of the prom, however, school officials decided to search the bus and found an empty champagne bottle and a dozen party cups.

School officials then conducted breathalyzer tests of all 40 students before allowing them to enter the prom. The students were not allowed to leave – neither before nor after they completed their own tests – until all 40 students in the group had been tested. Finally, at 11:55 p.m. the testing was complete, and the prom ended at midnight. Every student had registered a 0.0 blood-alcohol content.

Several of the students sued the school district and various officials, alleging violation of their First, Fourth, and Fourteenth Amendment rights. The school district officials pled the affirmative defense of qualified immunity and moved for summary judgment, which the trial court granted. The students then appealed.

On appeal, the court held that the school officials had a legitimate government interest in requiring the breathalyzer test because of the public school's role in maintaining the discipline, health, and safety of the students. The court also noted that school officials may detain students if they have a "reasonable basis" to believe they have violated a law or school rules. Therefore, the court determined, the school defendants did not violate the students' Fourth Amendment rights.

However, the continued detention of *all* the students until *all* had been tested is another matter. The school officials argued that their reason to continue detaining all the students was to not show any partiality in testing by releasing one student before another. Therefore, they reasoned, they would test and detain everyone together as a group. The court, however, concluded that not only should the testing be done in a reasonably expeditious manner, but after being exonerated by the test, each student should have been free to leave.

Lastly, the court considered the issue of qualified immunity. Qualified immunity protects government officials from personal liability even if they have violated the law as long as their actions did not violate clearly established laws or constitutional rights. To be considered "clearly established," a right or law must be one that a "reasonable person" would know was being violated by that person's actions. For qualified immunity to apply, "the public official must first prove that he was acting within the scope of his discretionary authority when the allegedly wrongful acts occurred." Key to qualified immunity is the official's "objective reasonableness, regardless of his underlying intent or motivation."

In this matter the court could find no prior case where students had been detained as a group for drug or alcohol testing and were required to remain effectively seized until all had been tested. Therefore, no "binding **clearly established** law" served to inform the school officials that they had violated the students' Fourth Amendment rights by continuing to detain them. Following this decision, the 11th Circuit has now established that students may not be detained after being exonerated by a test. In the end, the court of appeals upheld the summary judgment that the trial court had granted.

What These Decisions Mean to Your District

Although neither of these cases occurred in the Sixth Circuit, they pertain to federal, constitutional law and Supreme Court decisions that are applicable across the country. The key difference in these two cases in the finding of qualified immunity is whether a **clearly established** precedent exists. In the first case, a prior court decision had been made that would inform school officials on how to proceed. This assistant principal was denied qualified immunity and therefore must face a civil trial (note that a jury trial will consider both versions of events, and if it finds that McDowell's version is more accurate, he may still be entitled to qualified immunity; but if not, he will be liable). In the second case, however, no prior court decision addressed the issue at hand – detaining an entire group of students as a group instead of as individuals. The school officials in this case were granted qualified immunity.

Search and seizure continues to be an area rife with potential challenges for school districts. The first case demonstrates the possible consequences when administrators do not adequately maintain privacy in a strip search, which was a critical consideration. Even if they had maintained the student's privacy in that case, it also demonstrates the need for caution when administrators engage in more intrusive searches, and in particular strip searches.

As the prom case shows, time should be an important consideration for administrators during a student investigation. When administrators hold groups of students for long periods of time, whether for questioning or for other elements of an investigation, such action may violate a student's right to unlawful seizure. If students are being held, or detained, they are not free to leave and thus are considered seized "in their persons," as the Fourth Amendment states. The length of time they are detained should be a factor in considering the reasonableness or unreasonableness of their detention.

School officials are often faced with decisions that must be made at a moment's notice, rather than having the luxury of time to consult an attorney for legal research. Because those split-second decisions can have significant consequences, it is essential to routinely provide professional development to district leadership and staff about the frequent changes to search-and-seizure law for schools. Please contact Ennis Britton if you would like to discuss the resources available to clients in this field.

D.H. v. McDowell, No. 14-14960 (11th Cir. 2016)

Ziegler v. Martin County School District, No. 15-11441 (11th Cir. 2016)

Transgender Litigation Updates: Do the Recent Court Decisions Change Anything?

U.S. Supreme Court Issues Order in Ongoing Virginia Case

Title IX of the Education Amendments of 1972 prohibits discrimination against students on the basis of sex by schools that receive federal funding. More recently, the definition of "sex" has been the subject of guidance from the U.S. Department of Education and Department of Justice. In April 2014, the U.S. Department of Education Office for Civil Rights (OCR) indicated that Title IX's sex discrimination prohibition extends to discrimination "based on gender identity or failure to conform to stereotypical notions of masculinity or femininity." In this guidance, OCR informed school districts that discrimination against students who identify as being transgender, whether in the curricular setting or in extracurricular activities, is prohibited.

This guidance was later reinforced when the Departments of Education and Justice issued joint guidance in May 2016 stating that both federal agencies will treat a student's gender identity as the student's sex for purposes of enforcing Title IX.

Therefore, according to the Education and Justice Departments' interpretation and application of Title IX, school districts need to provide accommodations for transgender students. Ennis Britton has advised that decisions regarding transgender students be made on a case-by-case basis and in a team environment, wherein the parents, student, and administration may discuss the transition process for that student and the appropriate accommodations.

On August 3, 2016, the Supreme Court of the United States (SCOTUS) issued an order that has caused a number of school districts to question their compliance with the Education and Justice Departments' previous guidance. The SCOTUS order has temporarily stopped the enforcement of a lower federal court order that directed a school district in Virginia to permit a transgender male (biological female) to use the boys' bathroom at school. *Gloucester County Sch. Bd v. G.G.,* 579 U.S. ___ (2016).

The SCOTUS order did not reverse or overrule the guidance, interpretation, or application of Title IX that is being promulgated and enforced by the U.S. Departments of Education and Justice. Rather, the SCOTUS order maintained the status quo for that student and that Virginia school while the case plays out in the lower courts.

Caution should continue to be exercised in this area. Districts should not read too much into this SCOTUS order for a number of reasons. Justice Breyer described his deciding vote as a "courtesy." His vote is not necessarily in alignment with four other justices as it relates to accommodations of transgender students in schools. This order applies to the one student involved, G.G., and to the Virginia school seeking to deny the student accommodations within its buildings. Moreover, there is no guarantee that SCOTUS will ultimately hear the case. It could simply lift the order staying enforcement of the appellate court's decision. Even if SCOTUS hears the case, it seems likely that it would not directly address the transgender question but would instead focus on the rule-making and interpretation process that led to the recent guidance from the Departments of Education and Justice.

Federal Judge in Texas Blocks Department of Education Guidance

On Sunday, August 21, 2016, a federal judge in Texas issued a preliminary injunction order blocking the May 2016 guidance from the U.S. Departments of Education and Justice regarding the use of bathrooms, locker rooms, and other facilities for transgender students.

This injunction is a preliminary order and did not render a decision on the issue of facilities for transgender students or on whether the guidance from the Departments of Education and Justice is enforceable. As this order was issued from a federal court in Texas, it is clear that it applies to Texas and to the other states that joined Texas in a lawsuit against the United States. What remains unclear is the "nationwide" impact of this preliminary order for states not involved in the Texas lawsuit. Ohio did not join the Texas lawsuit but instead joined with Nebraska and several other states in a separate lawsuit in a Nebraska federal court.

School districts should continue to do what they do best:
provide accommodations, interventions, and services
to support all students' educational, social, and emotional needs.

What These Decisions Mean to Your District

School districts should consult legal counsel in determining how best to maneuver the legal, social, and political landscapes when considering if and how to accommodate transgender students in schools. Practically speaking, the U.S. Departments of Justice and Education may not enforce their guidance until the issue is fully resolved; however, we recommend that school districts continue to do what they do best: provide accommodations, interventions, and services to support all students' educational, social, and emotional needs. Districts should continue their practice of being student focused while complying with federal and state laws concerning students' civil rights. Privacy should prevent districts from discussing specific student issues or needs. Doing otherwise could subject a school district to litigation.

Impacts of Updated Guidance from U.S. Department of Education concerning Homeless Students

In December 2015, the Every Student Succeeds Act (ESSA) reauthorized the McKinney-Vento Education for Homeless Children and Youths program. Updated guidance was released by the U.S. Department of Education on

July 27, 2016, to help school districts understand the amendments to the McKinney-Vento Act, which will take effect October 1, 2016. These changes include the following:

- Greater emphasis on identifying homeless children and youths, requiring that state and local education agencies provide training for staff members to best meet the unique needs of homeless students.
- A focus on ensuring that eligible homeless students have access to academic and extracurricular activities, including magnet schools, summer school, career and technical education, advanced placement, online learning, and charter school programs.
- Ensuring that homeless children and youths are given the option to remain in their school of origin, which is defined as the school the student attended when they last had permanent housing.
- Dispute resolution procedures which now address eligibility issues, school choice, and enrollment. In the event of a dispute between a parent, guardian, or youth and the local educational agency, the student must be immediately enrolled in the school in which he or she sought placement. The student must also be provided transportation to or from the school of origin for the duration of the dispute, at the request of the parent, guardian, or local liaison representing an unaccompanied youth.
- New authority for local liaisons to confirm the eligibility of homeless children and youths for programs offered through the U.S. Department of Housing and Urban Development.

This guidance and the amended McKinney-Vento Act aim to equip schools with the necessary tools they need to best serve homeless students and ensure that they continue to receive an education. More information and advice for helping homeless students can be found in a fact sheet released by the U.S. Department of Education. If you have questions on how these changes can be implemented within your school district, please contact an Ennis Britton attorney.

Department of Education Guidance regarding ADHD

New guidance was issued July 26, 2016, from the U.S. Department of Education regarding identification and evaluation of students with attention-deficit/hyperactivity disorder (ADHD). Students with ADHD are entitled to protections under Section 504 of the Rehabilitation Act of 1974 (and possibly under the Individuals with Disabilities Education Act).

School districts have an obligation to identify, offer evaluations to, and make placement determinations for all affected students. If a medical evaluation is necessary to diagnose ADHD and to evaluate the need for special education or related services, the school must ensure that the student receives it at no cost to the parent.

School districts cannot simply group together a few aids and services and provide them in a blanket fashion to any student with ADHD.

According to the Office for Civil Rights, school districts might violate a student's right to a free, appropriate public education (FAPE) by –

- Failing to identify or evaluate a student for a disability or for access to special education services

- Failing to evaluate students in a timely matter or conduct an inadequate evaluation
- Making inappropriate placement determinations for special education or related aids and services based on misunderstanding of ADHD

How schools can follow the new guidance:

- Properly evaluate and reevaluate students when needed. The entire 504 team should determine placement.
- Avoid generalizations about students with ADHD and predetermined placement options.
- Provide services regardless of cost or whether services have only been for IDEA-eligible students previously.
- Create clear, detailed, individualized Section 504 Plans.
- Train staff to evaluate for disability and to recognize behaviors associated with ADHD.

Evaluation should not require the use of a particular assessment tool each time but should depend on the student. Remember not to act on stereotypes or generalizations about students with ADHD or to have limited placement options that are unrelated to an individual's needs. For example: Not every student with ADHD needs extra time on examinations taken in a quiet room, or placement at the front of a classroom. Some might require direct instruction to address the needs created by their disabilities, such as teaching how to break up a large, multi-step assignment into smaller parts, or ordering strategies.

The Dear Colleague Letter and 35-page resource guide are available here.

Legislation in the Works

House Bill 590

House Bill 590 proposes changes to the law regarding concealed handguns in prohibited zones such as schools. Among other things, under HB 590 a person with a valid concealed handgun permit would not be guilty of a felony, as under current law, for bringing a gun into a school. Rather, the person would only violate the law if he refused to leave the school upon request when it is observed that he is carrying a gun. A person would also violate the law if he returns to the same school with a gun within 30 days. Though it is not explicitly stated in HB 590, it is apparent that a person could repeatedly bring a gun into a school as long as the person waits at least 30 days after being specifically asked to leave before returning again with a gun. If the concealed weapon is not readily observable and the person is therefore never asked to leave the school, it would apparently be legal under HB 590 for the person to bring the gun into the school on a daily basis. This legislation seems unlikely to become law in its current form, and no significant action has been taken on the bill.

Senate Bill 346

Introduced to the Ohio Senate on August 16, SB 346 would require that schools begin each new school year after Labor Day. No provision is given that instruction must end before Memorial Day. Schools that have entered into a current collective bargaining agreement may continue their schedules as outlined in the agreement, and agreements drafted after the effective date of this legislation would be required to be in accordance with the new school year dates. No significant action has been taken on this bill.

Save the Date!
2016–2017 Administrator's Academy Seminar Series

For the 2016–2017 Administrator's Academy, Ennis Britton attorneys will present a series of four seminars on the following topics:

TACKLING ISSUES IN STUDENT DISCIPLINE
September 29, 2016
Live seminars in Cincinnati and Cleveland

SCHOOL EMPLOYEE LEAVE AND BENEFITS UPDATE
January 26, 2017
Live video webinar

SPECIAL EDUCATION LEGAL UPDATE
April 20, 2017
Live seminars in Cincinnati and Cleveland

2016–2017 EDUCATION LAW YEAR IN REVIEW
July 13, 2017
Live video webinar

Ennis Britton has listened to the valuable feedback from our clients! This year, we will offer the Administrator's Academy seminars in a different format from previous years. The September and April presentations will be provided at live seminar locations in both Cincinnati and Cleveland as well as in a live audio webinar option. The other two presentations will be offered via a live video webinar professionally produced by the Ohio State Bar Association. As always, we will offer an archive for all presentations.

Participants must be registered to attend each event. All four webinars will be archived for those who wish to access the event at a later time. You can register on our website or contact Hannah Reichle via email or phone at 614-705-1333.

Upcoming Dates and Deadlines

As your school district prepares for the next couple of months, please keep in mind the following upcoming dates. For questions about these requirements, please contact an Ennis Britton attorney.

- September 7 – Data appeals of retention and summer grade 3 English language arts data
- September 8 – Effective date of new medical marijuana law (O.R.C. Chapter 3796)
- September 12–15 – Grant-writing workshops across the state
- September & October – Ohio ESSA Stakeholder Meetings
- September 19 – Ohio's Safe and Violence-Free Schools Conference in Columbus
- September 28 – New public records law takes effect (O.R.C. §2743.75)
- October 1 – New homeless student guidance becomes effective
- October 13–15 – Rural Education national convention
- November 13–16: OSBA Capital Conference

Upcoming Presentations

September 8: OASPA Boot Camp
Presented by John Britton and Bill Deters

September 9: Clark County ESC Legal Update
Presented by Bronston McCord

September 13: SOESC Legal Update
Presented by Gary Stedronsky and Erin Wessendorf-Wortman

September 28: NWOASBO
Presented by Erin Wessendorf-Wortman

November 13–16: OSBA Capital Conference
November 14: Teacher Termination and Nonrenewal Update – John Britton
November 14: The Specter of Bullying in Schools – Pamela Leist
November 14: Transgender Students in Schools – Erin Wessendorf-Wortman and Todd Petrey
November 15: School Law Workshop – Legal Issues for Today's Hottest Tech Toys – Gary Stedronsky

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Stay up-to-date about important topics in school law!
Check out Ennis Britton's Education Law Blog.

Webinar Archives

Did you miss a past webinar or would you like to view a webinar again? If so, we are happy to provide that resource to you. To obtain a link to an archived presentation, contact Hannah Reichle via email or phone at 614-705-1333. Archived topics include the following:

- Managing Workplace Injuries and Leaves of Absence
- Special Education: Challenging Students, Challenging Parents
- Fostering Effective Working Relationships with Boosters
- Effective IEP Teams
- Cyberlaw
- FMLA, ADA, and Other Types of Leave
- Levies and Bonds
- OTES & OPES Trends and Hot Topics
- Tax Incentives
- Prior Written Notice
- Advanced Topics in School Finance
- Student Residency, Custody, and Homeless Students
- Student Discipline
- Media and Public Relations
- Gearing Up for Negotiations

Ennis Britton Practice Teams

At Ennis Britton, we have assembled a team of attorneys whose collective expertise enables us to handle the wide variety of issues that currently challenge school districts and local municipalities. From sensitive labor negotiations to complex real estate transactions, our attorneys can provide sound legal guidance that will keep your organization in a secure position.

When you have questions in general areas of education law, our team of attorneys help you make competent decisions quickly and efficiently. These areas include:

Labor & Employment Law

Student Education & Discipline

Board Policy & Representation

There are times when you have a question in a more specific area of education or public law. In order to help you obtain legal support quickly in one of these areas of law, we have created topic-specific practice teams. These teams comprise attorneys who are experienced and currently practice in these specific areas.

Construction/Real Estate
Construction Contracts • Easements • Land Purchases & Sales • Liens • Mediations • Litigation

Team Members:
Ryan LaFlamme
Bronston McCord
Gary Stedronsky

Workers' Compensation
Administrative Hearings • Court Appeals • Collaboration with TPAs • General Advice

Team Members:
Ryan LaFlamme
Pam Leist
Giselle Spencer
Erin Wessendorf-Wortman

Special Education
Due Process Claims • IEPs • Change of Placement • FAPE • IDEA • Section 504 • any other topic related to Special Education

Team Members:
John Britton
Bill Deters
Michael Fischer
Pam Leist
Jeremy Neff
Hollie Reedy
Giselle Spencer
Erin Wessendorf-Wortman
Megan Bair Zidian

School Finance
Taxes • School Levies • Bonds • Board of Revision

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