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School Law Review

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Outlook on Collective Bargaining Bill

House Bill (HB) 583 was introduced in the Ohio legislature on June 30, 2016. This bill would effectively eliminate fair share fees. Currently, nonbargaining-unit employees can be required, through the collective bargaining agreement, to pay dues to a union even though they do not belong as a member.

Ohio's HB 583 would revise state law to remove any requirement that public employees must join the representative union or pay dues, and the unions would not be required to represent any employees who are not members or paying dues.

The bill states in pertinent part:

> *No funds may be withheld from the salary or wages of any such public officer or employee for the purposes permitted by sections 9.80 and 9.81 of the Revised Code unless the withholding is specifically, freely, and voluntarily authorized by that public officer or employee in writing.*

The sponsor of the bill, Rep. John Becker, said in an interview, "I think it's good for Ohio and hopefully it will be able to move forward." However, he admits that he is not optimistic that the bill will pass. Furthermore, Gov. Kasich is not advocating any right-to-work legislation, based on a public vote that struck down similar legislation – Senate Bill 5 – in the past. Rep. Becker says that his bill differs from Senate Bill 5 because it does not address collective bargaining benefits. It simply gives public sector employees an option to opt out of union representation. Those who opt out would therefore not receive the corresponding union benefits.

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On a national scale, this issue was settled in 1977 with the U.S. Supreme Court decision in *Abood v. Detroit Board of Education*, which permitted unions to collect "agency" or "fair share" fees from non-union members to pay for union services, such as collective bargaining. Earlier this year, the Supreme Court heard *Friedrichs v. California Teachers Association*, which requested that the Court overturn the *Abood* decision. The Supreme Court deadlocked (4-4) after the death of Justice Antonin Scalia, allowing the *Abood* decision to stand. Following the deadlock, conservative legal advocacy group the Center for Individual Rights petitioned the Supreme Court to hold over the *Friedrichs* case until after Scalia's vacant seat is filled; however, the Court denied the petition for rehearing.

The 4-4 Supreme Court deadlock signals that arguments on both sides are valid and weighty. The constitutional question is whether fair share fees violate the First Amendment in requiring non-union members to pay unions to effectively speak for them. The Supreme Court's liberal justices, however, spent more time considering the effects of abandoning the Court's precedent in *Abood* than on questioning the constitutionality of agency fees, while the Court's conservative justices were skeptical of most – if not all – of the arguments for fair share fees.

Currently, fair share fees remain both legal and constitutional on a national scale but are prohibited in 26 states. Additionally, unions that represent federal employees are prohibited from collecting fair share fees.

How This Would Affect Your District

Although Ohio's HB 583 is controversial and not expected to pass, if it does pass and is signed into law, it will have a direct affect on many Ohio school district employees. Clearly, diminishing dues and membership as a result of the law will have a negative impact on the unions' ability to function effectively. However, the extent of such impact is not clear. Compensation and benefits would be a matter between the employee and the employer, although the benefit and compensation levels received by bargaining unit members will likely set the boundaries.

Federal Lawsuits regarding Transgender Guidance Letter

Ohio has joined Nebraska and eight other states in a lawsuit in response to the Dear Colleague letter from the U.S. Departments of Justice and Education regarding bathroom access for transgender students. The complaint, filed by Nebraska's attorney general on July 8, claims that the administration violated federal law by rewriting the "unambiguous term 'sex' under Title VII and Title IX to include 'gender identity.'" Along with Nebraska and Ohio in the lawsuit are Arkansas, Kansas, Michigan, Montana, North Dakota, South Carolina, South Dakota, and Wyoming. North Carolina was the first state to file a lawsuit; then Texas filed a suit to which 12 other states joined, bringing the total number of states that are suing to 24.

The Dear Colleague letter, which is considered "significant guidance," requires that schools allow transgender students to use the bathrooms, showers, and locker rooms that align with their gender identity. If schools do not comply, they risk legal action and losing vast amounts of federal funding. Districts that oppose the directive within the letter argue that these situations are better handled on a case-by-case basis within an individual school and that the guidance has threatened the autonomy of school districts to handle issues as they deem most appropriate.

Nebraska v. United States (D. Neb. 2016) ___.

Texas v. United States (N.D. Texas 2016) ___.

Central Ohio School District Files Its Own Suit

The Alliance Defending Freedom (ADF), a religious liberties group, has filed suit on behalf of Highland Local School District against the Departments of Education and Justice over demands that they accommodate a transgender student's bathroom preferences. If the district fails to allow the fourth grade student to use the bathroom matching her gender identity, it risks losing more than $1 million in federal funding.

ADF attorneys ask that a federal judge prohibit the Department of Education from initiating an enforcement action, as the district believes that the demands are unlawful and illegal attempt to rewrite current federal law. Jim Campbell, an ADF attorney, said in a statement, "The Department of Education is attempting to strong-arm Highland into complying with a lawless demand to open its single-sex overnight accommodations, locker rooms, showers, and restrooms to students of the opposite sex."

Highland has provided accommodation to the student via alternative, private facilities and argues that its accommodation is sufficient and appropriate. However, the student's parents, who filed a civil rights complaint in 2013, and transgender advocates feel that forcing transgender students to use separate facilities ostracizes them from peers and puts them at risk of bullying. The district's case will impact how similar cases are handled and may change how transgender students will be accommodated in the future.

Bd. of Educ. of the Highland Local Sch. Dist. v. U.S. Dep't of Educ. (S.D. Ohio 2016) ___.

What These Lawsuits Mean to Your District

For the time being, districts should continue to follow the advice you have received from Ennis Britton, which is in compliance with the Department of Education's interpretation of the relevant laws. While the legal questions surrounding this issue remain unsettled law in the Sixth Circuit, districts should be cautious so as to avoid costly litigation regarding discrimination. If you have questions or need to discuss a particular matter in your district, do not hesitate to contact us.

Recent Supreme Court Decisions

Affirmative Action

In a 4-3 ruling, the U.S. Supreme Court upheld race-conscious admissions for public universities and ruled against the university applicant who challenged this affirmative action policy at the University of Texas (UT) at Austin. Plaintiff Abigail Fisher sought to strike down the admissions process used by UT after she was denied admission by the university in 2008. However, the court found that the process was not unconstitutional and that Fisher was not denied equal protection of the law. In the majority opinion, Justice Kennedy writes that "considerable deference is owed to a university in defining those intangible characteristics, like student body diversity, that are central to its identity and educational mission." However, he stresses that universities have an obligation to continually assess their admissions process to determine whether changing demographics have eliminated a need for race-conscious admissions.

Fisher v. University of Texas at Austin, 579 U.S. ___ (2016).

What This Means for Your District

Race-conscious admissions policies and affirmative action are still acceptable and sometimes necessary, provided that schools can demonstrate how such a policy can help them achieve their educational mission.

Insurance

In *Zubik v. Burwell*, a group of nonprofit organizations joined forces from seven different federal cases to challenge the contraceptive mandate in the Affordable Care Act based on religious freedom. The contention is the ACA's provision whereby employees' health insurance coverage must include contraceptives. Instead of deciding the case, the Supreme Court vacated the judgment and remanded the cases to the lower courts that had rejected the religious challenge. The Supreme Court anticipates that the parties will be allowed sufficient time to arrive at an approach that ensures not only religious freedom but also full and equal health coverage, including contraceptive coverage.

Zubik v. Burwell, 578 U.S. ___ (2016).

What This Means to Your District

This is not a decision that directly impacts public schools in Ohio. Religious schools may provide employees with health insurance that does not include birth control. However, the insurance companies may inform the women, without notice to employers, that they can access birth control through the government and insurance company.

"Coming and Going" Rule Used to Deny Workers' Compensation Claim

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An Ohio court has denied a workers' compensation claim by an employee who was injured in a traffic accident while traveling to obtain paintbrushes to use at a job site.

The employee worked for a waterproofing company applying a special paint to newly constructed homes to waterproof the foundations. He received $50 plus mileage reimbursement for each house the employer assigned him to paint, and could typically complete five houses in a single day. His employer supplied the paintbrushes and paint. The employee obtained needed supplies at the headquarters but also stored some paint and paintbrushes at his house. He could also purchase supplies such as paintbrushes when needed and would be reimbursed.

One day on his day off, when the employee went to the headquarters to pick up his paycheck, his employer let him know that three jobs needed to be done that day. The employee's brother was with him at the time. He decided to go home to pick up paintbrushes and then drop off his brother on the way to the job site. Before he reached his home, however, he was in an auto accident and sustained serious injuries.

The employee filed for and was granted workers' compensation benefits after the accident, but the employer appealed. The employer lost at every administrative level, including at a hearing before the full Industrial Commission, which ultimately approved the prior allowances. The employer then appealed to the Franklin County Court of Common Pleas and won.

The employee then filed an appeal in the Tenth District Court, which analyzed the "coming and going" rule. According to this rule, an injured worker must prove that he or she was injured in the "course and scope of employment and that the injury arises out of the employment relationship." The rule is "a tool used to determine whether an injury suffered by an employee in a traffic accident occurs 'in the course of' and 'arises out of' the employment relationship so as to constitute a compensable injury."

The coming and going rule applies only to "fixed situs" employees, which are employees whose work location is assigned by the employer. An employee can be considered fixed situs even if the particular job location changes on a weekly or even daily basis. So long as the employee commences his or her substantial employment duties

only after arriving at a "specific and identifiable workplace designated by the employer," the employee will be considered fixed situs.

After determining that the claimant was a fixed situs employee, the court then analyzed whether the coming and going rule would be a bar to an allowance under the facts of the case. The court further determined that because the claimant was not required to store supplies at his house – but rather did so for his own convenience – he was not engaged in "substantial employment duties" when he travelled home to get the supplies. He did not begin his duties until he arrived at the job site. Accordingly, his accident did not occur within the course and scope of and arising out of the employment relationship.

The court also discussed exceptions to the coming and going rule that apply even to fixed situs employees. The "zone of employment" exception would permit an allowance for injury where the employee was injured in an area under the control of the employer, though perhaps not yet engaged in the performance of substantial job duties. A "special hazard" exception applies to employees who would not have been at the location of the injury but for the employment, and the employment itself creates a special risk "distinctive in nature or quantitatively greater than the risk common to the public." The "special mission" exception applies when the injury is sustained by the employee while performing a special task, service, mission, or errand for his employer, even before or after customary working hours, or on a day on which he does not ordinarily work. Finally, a "totality of the circumstances" exception looks at all of the relevant factors of the accident to determine (1) the proximity of the scene of the accident to the place of employment, (2) the degree of control the employer had over the scene of the accident, and (3) the benefit the employer received from the injured employee's presence at the scene of the accident.

The Tenth District Court found that none of the exceptions apply and upheld the trials court's denial of benefits.

What This Decision Means to Your District

If you have an employee who has been injured while traveling to or from a job location, all of the facts must be carefully analyzed to determine whether you are likely to succeed in a challenge asserting the coming and going rule. Please do not hesitate to contact Ennis Britton to assist in that analysis.

Cunningham v. Bone Dry Waterproofing, Inc. (2016-Ohio-3341).

Public Records Legislation and Cases

Laws regarding public records are under scrutiny across the United States, including in Ohio. Advanced technology has brought myriad ways to communicate information to U.S. citizens, who continue to demand increased transparency. Public-records law continues to develop and change in the form of both legislation and court decisions. Below are a few recent Ohio bills and cases dealing with public records that have an effect on school districts throughout the state.

House Bill 585: Body Cameras

The Ohio House introduced HB 585 on July 11, proposing that the record of body cameras worn by law enforcement officers be considered generally a public record if the officer is performing official duties. (This bill does not include any regulations on police dash cams.) The bill will specify circumstances in which a nonpublic record would become a public record, and circumstances in which recordings would not be public records. Personal or nonrelevant information, and generally, recordings of minors or victims, would be redacted. The bill would also require a local records commission to maintain records from a body camera for a minimum of one year

unless the law enforcement agency is subject to a records retention schedule that establishes a longer period of time.

Senate Bill 321

This bill, which was signed into law in June, becomes effective in late September. This new law provides a procedure for someone who has been denied access to public records, in the form of mediation or filing with the court of claims.

The bill also contains a provision that a public office which places all of its public records online may limit the number of records a person may request to receive digitally to 10 per month. The requirements and limitations are as follows:

1. All records must be online and accessible to the public except for during outages that are not within the control of the public office.
2. Records that are not online cannot be subject to the limit.
3. The limit also does not apply if the person making such requests certifies that the request responses are not being forwarded or used for commercial purposes.

The bill modifies the attorney fee provisions of the statutes. An award of fees is now mandated to be considered *remedial* and not *punitive*, and to enforce this, the bill limits fees to those that are incurred prior to the record being turned over plus the fees incurred to produce the proof of the amount and reasonableness of the fees incurred. The court may reduce the award of fees if it determines that the suit was not necessary and the records could have been obtained through less formal means. Finally, a public office may itself be awarded costs and fees if the court determines that the suit to enforce the fulfillment of a public records request is frivolous.

Attorney Billing Statements

In the 2016 case *State ex rel. Pietrangelo v. Avon Lake*, the Ohio Supreme Court ruled that, in certain circumstances, the professional fee summary of an attorney-fee billing statement is exempt from disclosure in a public-records request. In this case, the plaintiff, Pietrangelo, had requested certain public records from the City of Avon Lake, including attorney billing statements. The city complied with the request but redacted the following information from the attorney billing statements based on attorney-client privilege and attorney work product:

- Narrative descriptions of particular legal services rendered
- Exact dates on which such services were rendered
- The particular attorney rendering each service
- The time spent by each particular attorney on a particular day
- The billing rate of each particular attorney
- The total number of hours billed by each particular attorney for the invoiced period
- Total fees attributable to each particular attorney for the invoiced period

Pietrangelo then petitioned the Ninth District Court of Appeals for a writ of mandamus to compel the city to provide unredacted invoices, which the court granted.

The Ohio Revised Code notes that “public records” do not include records that are prohibited from release by state or federal law.

In a previous decision, *State ex rel. Anderson v. Vermilion* (134 Ohio St.3d 120, 2012-Ohio-5320), the Ohio Supreme Court held that itemized statements, including dates of services, hours, rates, and money charged for the services, are not exempt from public-records law and therefore must be disclosed. However, in *State ex rel.*

Dawson v. Bloom-Carroll Local School Dist. (131 Ohio St.3d 10, 2011-Ohio-6009), the same court found that the narrative portions of the statements were confidential but a summary of the invoice, including the attorney's name, the invoice total, and the matter involved, was sufficient for the public-records request. One of the differences between the two cases, *Anderson* and *Dawson*, is that the matter in *Dawson* was pending litigation but the matter in Anderson was for general informational purposes.

In *Pietrangelo v. Avon Lake*, the Ohio Supreme Court held that this case resembles the Dawson case and that the records relating to the pending litigation were exempt from disclosure. "If disclosed, Pietrangelo may acquire information that would be useful in his litigation strategy against the city, whereas in *Anderson*, any harm from disclosure of attorney-client communication was remote or speculative."

State ex rel. Pietrangelo v. Avon Lake, Slip Opinion No. 2016-Ohio-2974.

Directory Information

The Ohio Supreme Court determined that School Choice Ohio was entitled to records that constitute *directory information* as defined by the district's public records policy. However, the organization did not have the right to compel the district to amend its student records policy.

School Choice obtains students' contact information from Ohio public school districts via public-records requests. In addition to requesting the court to compel the district to disclose the records requested, the organization also attempted to compel the district to amend its policy to expand directory information and to require disclosure to its company by amending the parent notice and opt-out provisions. According to the Family Educational Rights and Privacy Act (FERPA), "directory information" includes the following student information:

- Name, address, telephone listing, and date and place of birth
- Major field of study
- Participation in officially recognized activities and sports
- Weight and height of members of athletic teams
- Dates of attendance
- Degrees and awards received
- The most recent previous educational agency or institution attended

Pursuant to FERPA, districts must determine which of the items listed above are to be considered directory information. Districts must then provide public notice to parents of what it defines as directory information and give them an opportunity to opt out of directory information being disclosed without prior written consent.

Ohio law defines directory information similarly and places an additional condition on disclosure – that directory information cannot be requested or disclosed for profit-making activities. In fact, whether directory information is being used for profit-making activities is the one time in public records law where the public office is permitted to inquire about the purpose of the request.

Ohio law also provides that a district may not limit the disclosure of directory information to representatives of the armed forces, business, industry, charitable institutions, other employers, and institutions of higher education unless such restriction is uniformly imposed on each of these types of representatives. The court determined that School Choice Ohio is not any of these types of organizations.

However, the court ultimately concluded that even with the limited way in which the district defined its directory information, which was lawful, the organization fit within the definition and was entitled to the records.

What This Decision Means to Your District

Many districts have received the annual requests from this particular organization and from others. This case considered the question of whether the organization is engaged in profit-making activity and answered in the negative. Therefore, districts should continue to disclose records, including directory information, in accordance with the relevant policy. Remember to consult your list of opt-outs whenever directory information is going to be disclosed without prior written consent of the parent. If you are considering changes to your public-records policies, please contact an Ennis Britton attorney for assistance or review.

New Vaccine Requirements in Ohio Schools

Ohio has implemented new meningococcal vaccine requirements for students entering grades 7–12, beginning with the 2016–2017 school year. Students entering grade 7 will need to have one dose of meningococcal (serogroups A, C, W, and Y) vaccine in addition to the current requirement of having one dose of the Tdap (tetanus, diphtheria, and acellular pertussis) vaccine. Students entering grade 12 will need to have a second dose of meningococcal vaccine. The second dose must be administered on or after the 16th birthday. If the first dose of meningococcal vaccine was administered after the 16th birthday, a second dose is not required.

Find more information on the meningococcal vaccine at the CDC website and more information on Ohio school immunization requirements from the Ohio Department of Health.

Upcoming Deadlines

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

- **8/8–9:** Register now for Occupational Therapy/Physical Therapy School-Based Practice
- **8/11–12:** Register now for Ohio Charter School Summit
- **9/30:** Reporting requirements on food and beverages sold on school premises due
- **9/30:** Career-Technical Middle Grades Waiver form due

Upcoming Presentations

SAVE THE DATE! 2016–2017 Administrator's Academy Series

September 29, 2016

Live seminars in Cincinnati and Cleveland

January 26, 2017

Video webinar

April 20, 2017

Live seminars in Cincinnati and Cleveland

July 13, 2017

Video webinar

Participants must be registered to attend each event. Each seminar will be accompanied by a live online webinar. The 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: 614-705-1333.

Other Upcoming Presentations:

August 1: Bill Deters at Montgomery County ESC – Legal Update

August 3: Erin Wessendorf-Wortman at Mercer County ESC – Legal Update

August 4: Gary Stedronsky at Southwest Local School District – Legal Update

August 4: Ryan LaFlamme, Hollie Reedy, and Erin Wessendorf-Wortman – Northwest Ohio ESC Fall Retreat

August 4: Jeremy Neff at Clermont County – Legal Update

August 4: Megan Bair Zidian at Mahoning County ESC – Legal Update

August 9: Bronston McCord at Southern Ohio ESC – Legal Update

August 9: Hollie Reedy at School Resource Officers – Basic Training

August 10: Pamela Leist at Trumbull County ESC – Special Education

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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: 614-705-1333. Archived topics include:

- Managing Workplace Injuries & 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 & Bonds
- OTES & OPES Trends & 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 specialized 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 already have experience in and currently practice in these specialized 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
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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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