

Volume 27, Issue 4

Summer 2022

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TRI-STATE AREA School Study Council

Seeking ways to increase organizational capacity in schools through problem solving, technical service, and staff development so all students will be better prepared to make contributions to both our democratic society and the world community

University of Pittsburgh School of Education

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Tri-State Staff Changes

As announced in the last newsletter, I will be retiring from the role of Director of Tri-State Area School Study Council effective August 31. I have been the director of Tri-State for the past 16 years and have sincerely enjoyed my time in this role. During my time here. I have had the opportunity to see many excellent administrators flourish in their roles. I would like to thank those that I have worked with frequently over the years including the many administrators who mentored my students and prepared them to be outstanding leaders in the field. I would also like to thank the Tri -State Board, who have consistently been available to help guide Tri-State activities through the years. Also, thank you to the law firms and other partners, including Green Building Alliance, Women's Law Project, PDE, and others, who present for Tri -State and prepare sections for this newsletter each quarter. The support and guidance that the firms have brought to Tri-State has been instrumental to our programming. I have enjoyed the connections I have through Tri-State and appreciate the strength of our region due to the excellent administrators who lead their organizations. I will still be local and involved in the field. If I can be of assistance to you, please feel free contact me.

Rachael Savage, our Tri-State's administrator for the past three years has announced she will also be leaving effective August 8. Rachael has been instrumental to all of Tri-State operations. She has been the one behind the scenes responsible for all of the day-to-day activities as well as orchestrating the many conferences, events, and webinars we provided. When we were interrupted by the restrictions due to the Covid pandemic, Rachael ensured our programs continued and she seamlessly transitioned us to virtual. Rachael and I have been a wonderful team, it has been a pleasure to work with her. I would like to thank her and wish her the best of luck in all she does going forward.

Congratulations to Dr. Michelle Miller, Superintendent of South Fayette Township School District, Dr. Michael Loughead, Superintendent Hampton Township School District, and Dr. Heidi Ondek, Superintendent/Executive Director Western PA School for Blind Children. Effective August 1, they will be the Interim Co-Directors of our Tri-State Area School Study Council and affiliated/visiting faculty members of Pitt's School of Education. Pending approval from the University, the School of Education plans to identify, recruit, and hire a successful candidate to serve as the next appointment-stream faculty member. I wish them the best in this role and know that the organization will be in excellent hands during the transition as they are all outstanding leaders.

If anyone needs anything from me, please don't hesitate to reach out. I am happy to help as much as I can. You can still reach me at <u>dlk31@pitt.edu</u> or at 412-719-4304. - Dr. Diane L. Kirk

Director, Tri-State Area School Study Council

Thank you to the law firms who contribute to *The Forum* newsletter each issue:

- Andrews & Price, Special Education Alert
- <u>Tucker Arensberg Attorneys</u>, Education Law Report
- Weiss Burkardt Kramer LLC, In Brief: School Law Update (Located on pages 6-7 of The Forum)

Summer Workshop Recap

Dr. Samuel Francis School Law Symposium and Special Education Workshop

Held virtually June 23, 2022

This year, Tri-State held the annual Dr. Samuel Francis School Law Symposium and Special Education Workshop virtually on Zoom. We had simultaneous tracks running through the day—one for School Law presentations and the other for Special Education presentations. Attendees were able to choose between the tracks and view the content most relevant to them and their organizations.

The topics covered were extremely timely and useful to current school administrators. Recent cases were thoroughly discussed as to how the ruling may impact future decisions of the courts and how this may affect school districts.

As always, we would like to thank the attorneys who put together and presented their sessions for Tri-State. Their expertise is incredibly helpful to Tri-State attendees.

If you are a member and missed registration, please feel free to reach out by August 8 to tristate@pitt.edu to get access to the recordings. Recordings will remain available until September 1, 2022.

School Law

- "School Law Update" Presented by Carl Beard
- "The Accidental Meeting Emails, Text Messages and Social Media Posts Under the Sunshine Act and Right to Know Law." – Presented by Matt Hoffman and Christopher Voltz
- "Universal Masking: On, Off, On, Optional?" Presented by Jocelyn Kramer
- "From Cursing Cheerleaders to Praying Coaches: The U.S. Supreme Court on the Speech Rights of Students and Public Employees" – Presented by Sara Rose
- "Safe Schools: Our Shared Responsibility and Collective Challenge"- Presented by Megan Turnbull
- "Managing employees in a shifting, modern economy" Presented by Patrick Fanelli
- "Ethics: Rules of Professional Conduct for Lawyers" Presented by Joseph Dimperio

Special Education

- "Investigation What's your information?" Presented by Christina Lane
- "You're on Mute: Ensuring FAPE and Meaningful Participation in an Increasingly Virtual World" Presented by Lynne Sherry and Annemarie Harr
- "Understanding the State Performance Plan Compliance Indicators, Special Education Public Reporting, and Other Relevant Bureau of Special Education (BSE) Updates" – Presented by Barbara Mozina, Amy Pastorak, and John Cica
- "[Mis]understanding Discipline Under Section 504" Presented by Patricia Andrews
- "Tracking Child Find, Evaluation, and Reevaluation Compliance Post-COVID School Closures" Presented by Aimee Zundel

TRI-STATE AREA SCHOOL STUDY COUNCIL University of Pittsburgh **Dr. Samuel Francis** School Law Symposium and Special Education Workshop

The Forum 2

Green Building Alliance

Managing Air Quality in the Pandemic: How K-12 Schools Addressed Air Quality in the Second Year of COVID-19



Green Building Alliance

On May 6th, 2022, the Center for Green Schools, Lawrence

Berkeley National Lab, and the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) held a webinar to discuss Managing Air Quality in Year Two of the Pandemic. From October-December 2021, the team conducted a national survey of public-school districts. The intent was to understand different schools and their implementation of ventilation, filtration, disinfection, and air quality monitoring strategies. The research team received responses from 4,000 schools that served over 2.6 million students.

Summary of Findings

- School districts prioritized increasing outdoor air intake. Increasing outdoor air through HVAC systems was the most prevalent building engineering control measure taken, followed by opening windows.
- The top challenge for schools in implementing many of the recommended indoor air quality (IAQ) measures was that buildings' HVAC systems were not designed to implement the recommendations.
- School district characteristics such as demographics, locale, and size were not associated with the number of IAQ measures taken, but were associated with the implementation of specific measures, such as increasing outdoor air through HVAC systems and assessing outdoor air delivery.
- American Rescue Plan Elementary and Secondary School Emergency Relief (ARP ESSER) funding has been used to support the implementation of IAQ measures more than funding from operating or capital budgets. Just over half of school districts reported that they felt they had access to funding to support additional engineering controls.
- Non-urban districts were more likely to lean on state and local guidance, and urban districts were more likely to use federal-level guidance and guidance from national organizations like ASHRAE.
- Over a quarter of districts responded that there were no new plans to implement additional ventilation, filtration, or other building changes in schools.



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This webinar marked the release of the second national school Indoor Air Quality (IAQ) survey report that was built from their initial "Preparation in the Pandemic: How Schools Implemented Air Quality Measures to Protect Occupants from COVID-19," series last April. For more information, please see the resources below.

Speakers

Anisa Heming, Director, Center for Green Schools Phoebe Beierle, Senior Manager of Programs, Center for Green Schools Corey Metzger, PE, ASHRAE Epidemic Task Force Schools Team Lead Wanyu Rengie Chan, Ph.D., Indoor Environment at Lawrence Berkeley National Laboratory Jacob Bueno de Mesquita, Ph.D., Indoor Environment at Lawrence Berkeley National Laboratory Caroline Shannon, AIA, Center for Green Schools, MPH candidate at Harvard T.H. Chan School of Public Health

Resources

GBA aims to engage and support western PA K-12 school districts to capture federal and state resources. Our work includes educating stakeholders about the importance of green, healthy, and high-performance building practices; assessing and developing building improvement project scopes of work; engaging service providers; identifying and applying for funding resources and writing letters of support. If your school needs technical assistance, please contact ramonac@gbapgh.org or chrisc@gbapgh.org to set up a consultation.

Report:

Managing Air Quality During the Pandemic (1).pdf / Resources | Center for Green Schools

Articles:

<u>Get the facts about air quality in schools | Center for Green Schools</u> <u>How schools managed air quality during the pandemic | U.S. Green Building Council (usgbc.org)</u>

Tri-State Executive Committee 2022-2023

President: Michelle Miller, South Fayette Township School District **Vice President:** Michael Loughead, Hampton Township School District

- Darby Copeland, Parkway West CTC
- Matthew Curci, Apollo-Ridge School District
- Michael Daniels, Canon-McMillan School District
- Timothy Gabauer, Mount Pleasant Area School
 District
- Joseph Guarino, New Brighton Area School District
- Todd Keruskin, Elizabeth Forward School District
- David Lehman, Forest Hills School District
- Janell Logue Belden, Deer Lakes School
 District
- Michael Lucas, Trinity Area School District

- Donald Martin, Intermediate Unit 1 School
 District
- Scott Martin, Bentworth School District
- Donna Nugent, Big Beaver Falls Area School District
- Heidi Ondek, Western PA School for Blind Children
- Gennaro Piraino, Franklin Regional School District
- Janet Sardon, Yough School District
- Robert Scherrer, Allegheny Intermediate Unit
- Tracy Vitale, Seneca Valley School District
- Brian White, Butler Area School District

Women's Law Project Update

Women's Law Project

NEW TITLE IX REGULATIONS PROMISE A FAIRER RESPONSE TO SEXUAL HARASSMENT SURVIVORS, LGBTQ STUDENTS

Women's Law Project

On June 23, 2022, the 50th anniversary of Title IX, President Biden proposed long-awaited regulations to prevent discrimination based on sex in any educational program or facility receiving federal funding. These new proposed regulations will, if adopted, expand Title IX's scope and strength to address sexual harassment in order to support, empower, and include all students.

The new regulations correct deficiencies in the current rules governing Title IX, which Betsy DeVos, former Secretary of Education under the Trump administration, had redrafted in 2020 to make it more difficult to report sexual harassment and to obtain necessary accommodations as students recover from a sexual assault. The DeVos regulations also rescinded an Obama-era guidance protecting LGBTQ students.

According to the National Women's Law Center, <u>Biden-Title-IX-proposed-rule-explainer-7.14.22-vF.pdf</u> (<u>nwlc.org</u>), in order for schools even to open an investigation into reported sexual harassment, these 2020 regulations require the harassment to be "pervasive, severe, and so objectively offensive" that the student is effectively denied an equal education. The regulations thus diminish the definition of sexual harassment to only include *repeated serious* offenses — meaning a victim already has to have experienced serious harm for a school to take action. And in some circumstances, if a case of sexual harassment is not reported to the right person and in the correct format, the school can ignore the sexual harassment complaint.

Even if the complaint is accepted, there are fewer protections for victims as they await the results of an investigation — allowing schools to treat victims poorly while the complaint is being processed. It is no wonder that most sexual harassment goes unreported, because the help and justice survivors deserve are often out of reach.

A particularly troubling feature of the DeVos regulations is their failure to explicitly protect students from discrimination based on gender identity or sexual orientation. In workplace settings, LGBTQ employees are protected from gender identity and sexual orientation harassment by the anti-discrimination law that prohibits sexual harassment and sex discrimination. In this respect, LGBTQ students have less explicit and less reliable protection from certain manifestations of sex discrimination than LGBTQ employees in the workplace.

Thankfully, the Biden Administration has reversed course. According to the new proposed regulations, any allegations of sexual harassment – regardless of gender, sexual identity, number of occurrences, who it is reported to, and in what format — must be addressed. All school employees would be considered mandated reporters of sexual harassment.

Sex-based discrimination would include discrimination based on a student's sexual orientation, gender identity, sex characteristics (including intersex traits), and sex stereotypes. Every student would have the right to use gender-appropriate school facilities and restrooms, locker rooms, and dressing rooms, be addressed by staff and students with their correct names and pronouns, and otherwise participate in school consistent with their gender.

Schools also would have to be actively looking for ways to improve their reporting methods, victim support systems, and overall school culture to prevent harassment and discrimination from taking place.

The new Biden proposed regulations were published in the Federal Register on July 12, thus beginning the 60-day public notice and comment period. Interested members of the public have until September 12, 2022, to submit comments on the proposed rules. Comments may be submitted to the Department of Education online at: <u>https://www.regulations.gov/document/ED-2021-OCR-0166-0001</u>. Please make your voice heard: every student deserves to learn and develop their skills in an environment that makes them feel safe, empowered, and supported. ▲



In Brief: School Law Update

WBK is 100% women-owned.

Summer 2022

Omnibus Amendments to the School Code Signed into Effect by the Governor

By Nicole W. Williams, Esq.

On July 8, 2022, Governor Wolf signed House Bill 164 into law. The bill includes many amendments to the School Code, some of which are summarized below. Stay tuned for a more in-depth analysis from the attorneys at WBK.

• Sections 121 and 121.1 have been amended to require that beginning in the 2022-2023 school year, an industryrecognized credential attained by a student must be included on the student's transcript and that an alternative path to proficiency in any

school year in which a demonstration of proficiency on a Keystone Exam is required for high school graduation.

- Sections 732.1 and 2608-J have been amended to extend the moratorium on the acceptance of new Plancon projects through the 2022-23 fiscal year.
- Section 1115 is a new section providing for school mental health specialists and behavioral specialists working under the supervision of Certified School Social Worker.
- Sections 1205.2 and 1205.5 have been amended to extend/suspend deadlines for complying with continuing education requirements until June 30, 2023/for one year.
- Section 1206.1 is a new section requiring PDE to issue a comparable Pennsylvania certificate on an expedited basis to an out-of-state candidate meeting certain requirements set forth in the School Code who is seeking PA certification in a subject identified by PDE as a shortage area.
- Section 1337 changes the threshold for offering an alternative meal from \$50 in a school year for unpaid school meals to \$75.
- Section 1383 has been amended to allow a student with disabilities as defined in 22 Pa. Code §14.101 who reached the age of twenty-one (21) during the 2021-2022 school year, or will reach the age of twenty-one (21) prior to the start of the 2022-2023 school year, and was enrolled during the 2021-2022 school year, to maintain enrollment during the 2022-2023 school year if a parent or guardian and the student elect to enroll no later than August 1, 2022.
- Several amendments were made to the provisions of the School Code concerning requirements for School Safety and Security and School Mental Health Services.
- Article XVII-D has been added to require PDE to establish a Disability Inclusive Curriculum Pilot Program to provide instruction to students on the political, economic and social contributions of individuals with disabilities.
- Section 2599.6 has been amended to provide that for the 2022-23 school year and beyond, Ready-to-Learn Block Grants will be in an amount not less than the amount received during the 2021-22 fiscal year. ♦

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Understanding <u>Kennedy v. Bremerton</u> <u>School District</u> and its Impact on Religious Expression of Employees

by Michelle E. Gannon, Esq.

On June 27, 2022, the United States Supreme Court published an opinion in <u>Kennedy v. Bremerton</u> <u>School District</u>. Joseph Kennedy was terminated from his position as a high school football coach in the Bremerton School District after he knelt at midfield following the high school's football games to offer a quiet personal prayer. Mr. Kennedy then sued in federal court, alleging that the District's actions violated the First Amendment's Free Speech and Free Exercise Clauses.

Mr. Kennedy had been coaching football within the District since 2008. For many years, unbeknownst to school administration, Mr. Kennedy engaged his players in pregame and postgame prayer in the locker rooms. His motivational speeches also contained direct reference to religion. In addition, Mr. Kennedy began praying with his players, members of the public, and opposing teammates and coaching staff at the conclusion of games.

The District became aware of this conduct in 2015 and subsequently initiated an official inquiry to determine whether this conduct constituted a violation of the Establishment Clause. Due to its concerns regarding this behavior, the District requested that Mr. Kennedy stop engaging players in prayer. Mr. Kennedy did stop praying with athletes in the locker room and his motivational speeches became secular in nature; however, he continued to

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Kennedy vs. Bremerton School District, continued

kneel mid-field at the conclusion of games, joined mostly by citizens in the stands and members of the opposing team. This practice continued for three additional games until Mr. Kennedy was subsequently placed on administrative leave. His contract was then not renewed.

The District Court granted an award of summary judgment to the District and the Ninth Circuit affirmed; however, the Supreme Court reversed and found that Mr. Kennedy was entitled to summary judgment on his religious exercise and free speech claims. The Court viewed this silent prayer as akin to a teacher silently praying over her lunch. The Court deemed Mr. Kennedy's religious activity as non-coercive in nature, as his students were not praying with him. The Court also made clear that prayer involving a captive audience remains impermissible including prayer over the loudspeaker or prayer as part of a speech at a mandatory event.

The timing and circumstances of Mr. Kennedy's prayers seemed to heavily inform the Court's decision. Because the prayers occurred during the postgame period when coaches were free to attend briefly to personal matters and students were engaged in other activities, the Court determined that Mr. Kennedy did not offer his prayers while acting within the scope of his duties as a coach. Therefore, it remains settled law that District employees would violate the Establishment Clause if prayers were offered while those employees were acting within the scope of their duties. This behavior would continue to be seen as an endorsement of religion.

When analyzing these issues, considerations must center around whether the speech was private speech or government speech, whether there was any coercion, implicit or explicit, by the speaker compelling others to participate in the religious speech, and whether there was a captive audience at the time of the religious speech. The Court has made clear that the answer to these factors will drive the ability, and responsibility, of the school district to appropriately limit any religious speech in question. As a new school year begins, should you have any questions on how to navigate issues of religious speech please do not hesitate to reach out to your solicitor or any of the attorneys at WBK.

Annemarie Harr Eagle Named Chair of WBK's Special Education Law Practice



Annemarie Harr Eagle

Attorney Annemarie Harr Eagle has been appointed chair of WBK's Special Education Law practice, leading the team of WBK attorneys specializing in special education law. Attorney Harr Eagle joined WBK in 2015.

She serves as the Solicitor for Career and Technology Centers and school districts across Western Pennsylvania where she focuses on special education, student services and

general solicitor assignments, including special education and Section 504 litigation, employment matters, and Federal Civil Rights litigation. She also serves as an adjunct professor of Special Education Law at Duquesne University School of Law and is Chair of the Allegheny County Bar Association's School and Municipal Law Section. ◆

We're Speaking...

- On September 2, 2022 Attorney Rebecca Heaton Hall will co-present with Jessica Dirsmith at the PSEA DPS Virtual Conference. Their session is titled "Emotional Disturbance: Ethical and Legally Compliant Intervention, Assessment, and Identification Practices."
- Attorney Megan Turnbull will be speaking on September 29, 2022 at the Pennsylvania State Association of Township Supervisors' Regional Forum in Cranberry Township.
- Attorneys Annemarie Harr Eagle and Lynne Sherry will be speaking at PBI's Exceptional Children's Conference on October 14 in Mechanicsburg, PA. Attorney Harr Eagle will be discussing FAPE in the Virtual Setting. Attorney Sherry will be presenting on the topic of Child Find.
- Attorneys Ira Weiss and Annemarie Harr Eagle are speaking at the NAPSA's (National Association of Pupil Service Administrators) 56th Annual Conference being held from October 16-19, 2022 at the Drury Plaza Hotel in Downtown Pittsburgh. Attorneys Weiss and Harr Eagle will be presenting in a joint session on October 17th titled, "Legal Challenges Relating to Pupil Service Including Equity, Diversity, and Inclusion." Attorney Harr Eagle will present a separate session on the topic of Title IX.
- Attorney Rebecca Heaton Hall will be presenting at the NBI School Law Boot Camp, broadcasted October 27, 2022. Attorney Hall will present two sessions titled: 1) Key Laws to Know, and 2) COVID-19's Impact on Education: Teacher Shortages, Student Mental Health Concerns, Virtual Learning, and Beyond.

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This issue of In Brief: School Law Update is meant to be informational		

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This issue of In Brief: School Law Update is meant to be informational and does not constitute legal advice. Should districts wish legal advice on any matter, they should contact their legal counsel or request a legal opinion from Weiss Burkardt Kramer LLC.

Regional Superintendent Changes

Congratulations to everyone in new positions and to those who have moved on to new opportunities! Thank you to everyone who helped us in putting together this list.

Intermediate Unit 1 (Washington)	Jefferson-Morgan School District, Mr. Brandon Robinson , Superintendent Fort Cherry School District, Dr. Tom Samosky , Superintendent Washington School District, Dr. George Lammy , Superintendent
Intermediate Unit 2 (Pittsburgh)	Pittsburgh Public Schools, Dr. Wayne Walters, Superintendent
Intermediate Unit 3 (Allegheny)	Clairton City School District, Dr. Tamara Allen-Thomas , Superintendent McKeesport Area School District, Dr. Tia Wanzo , Acting Superintendent Sto-Rox School District, Dr. Megan Van Fossan , Superintendent West Jefferson Hills School District, Dr. Janet Sardon , Superintendent Wilkinsburg School District, Dr. Joe Maluchnik, Superintendent Woodland Hills School District, Dr. Dan Castagna , Superintendent
Intermediate Unit 4 (Midwestern)	Commodore Perry School District, Mr. Ken Jewell , Superintendent Lakeview/Middlesex School District, Mr. Raymond Omer , Superintendent Moniteau School District, Ms. Aubrie Schnelle , Superintendent New Castle School District, Mr. Rick Rossi , Acting Superintendent Reynolds School District, Mr. Raymond Omer , Superintendent Sharon City School District, Ms. Justi Glaros , Superintendent Wilmington Area School District, Dr. Terence Meehan , Superintendent
Intermediate Unit 7 (Westmoreland)	Derry Area School District, Mr. Greg Ferenchak , Superintendent Greater Latrobe School District, Mr. Michael Porembka , Superintendent Ligonier Valley School District, Mr. Timothy Kantor , Superintendent Monessen City School District, Mr. Garrette Edmonds , Acting Superintendent Yough School District, Dr. Anthony DeMaro , Superintendent
Intermediate Unit 8 (Appalachia)	Bellwood-Antis School District, Mr. Edward DiSabato , Superintendent Everett Area School District, Mr. David Burkett , Superintendent Glendale School District, Mr. Sean Gildea , Superintendent Portage Area School District, Dr. Todd Dishong , Superintendent United School District, Ms. Teresa Young , Superintendent Windber Area School District, Mr. Richard Lucas , Acting Superintendent
Intermediate Unit 27 (Beaver)	Beaver Area School District, Dr. Mark Holtzman , Superintendent Freedom Area School District, Ms. Diane Workman , Superintendent

Visit Tri-State's job board for current postings. https://tristate.pitt.edu/jobs

If you have any jobs you would like advertised, please email us.

Current Administrative Openings

Superintendent – State College Area School District, Posted 8/1/22

Assistant Principal – McGuffey School District, Posted 7/26/22

Superintendent – Red Lion Area School District, Posted 7/26/22

Superintendent – Hopewell Area School District, Posted 7/12/22

Assistant Superintendent – Franklin Regional School District, Posted 7/12/22

Superintendent of Schools – Monessen City School District, Posted 7/7/22

2022-2023 Membership

Tri-State Area School Study Council would like to thank our membership for your continued support of our organization. We would not be able to put on the workshops, conferences, and networking events, both in-person and virtual without your help and support.

We hope that you will be able to renew your membership for the 2022-2023 membership year. Invoices for renewal have been sent to current members. Do not hesitate to contact us at <u>tristate@pitt.edu</u> if your have any questions. We look forward to having you as members for years to come.



Tri-State Contact Information

Please continue to use the contact information below during this time of transition.

Email: tristate@pitt.edu

Mailing: Tri-State Area School Study Council University of Pittsburgh 5151 Wesley W. Posvar Hall Pittsburgh, PA 15206

Website: tristate.pitt.edu

Thank you in advance for your patience and understanding.

The Forum is a publication of the Tri-State Area School Study Council. Your comments and suggestions of topics for future publications are always welcome. You may contact us at:

Tri-State Area School Study Council 5151 Wesley W. Posvar Hall 230 South Bouquet Street Pittsburgh, PA 15260 Phone: (412) 648-3907 Email: <u>tristate@pitt.edu</u> *Director:* Dr. Diane L. Kirk Administrative Assistant: Rachael Savage

The information in **The Forum** is for the general knowledge of the reader. For more specific information, rely on the advice of your solicitor.