


# ANNUAL SEMINAR

A. Lynn Himes, John Fester, Courtney Stillman, Darcee Williams
September 18, 2026

Copyright 2026, Himes, Petrarca & Fester, Chtd.




# NEW LEGISLATION

# Notice to Remedy
# PA 104-0647




Establishes additional procedural requirements both before and after a school board issues a “notice of remedial warning” or “notice to remedy”

- Overhauls the rules for issuing a “notice to remedy” to tenured public school teachers
  - Transformed from a non-negotiable school board directive into an arbitrable disciplinary action
- The written warning must specify the nature of the alleged misconduct that needs to be remedied
  - A board can assert that the behavior in the warning is part of a previous pattern, but any subsequent action must be reasonably related to the specific conduct alleged in the original warning
- Teacher must have the opportunity to respond to the findings in writing or in person before the school board approves the warning.
- Subjects the written warnings to binding arbitration
- Arbitration fees split 50/50 & teachers are entitled representation throughout the entirety of the process



Copyright 2026, Himes, Petrarca & Fester, Chtd.

# Student Growth Removed from Evaluations PA 104-0646

- The authority over student growth components of evaluations rests jointly with the local school district administration and teachers' union through a joint-committee
- If parties cannot reach an agreement regarding student growth and no active contract incorporates it, the component is removed
  - If the current CBA explicitly includes student growth, it remains in effect until the contract expires unless amended earlier
  - If the CBA expires and an impasse occurs over whether to retain the student growth metric, the default is removal
- Established an explicit "default-to-removal" mechanism if local parties cannot reach an agreement





Copyright 2026, Himes, Petrarca & Fester, Chtd.

# AI and Teacher Evaluations
# PA 104-0565

- Passed in conjunction with several more AI regulations – more to come
- Prohibits evaluators from using AI tools to assign a numerical score or qualitative rating for any component of a teacher's eval or any eval task that requires professional judgment
- Allows AI tools to be used to support the evaluator in administrative tasks related to evaluations, as long as they disclose using the AI and give the tool's name and purpose.
- PERA committee responsible for developing district's teacher evaluation plan to determine how AI may be used in evaluations, consistent with the requirements of the Act.





Copyright 2026, Himes, Petrarca & Fester, Chtd.



# Staff Mental Health
# 105 ILCS 5/10-20.88

- January 1, 2028, deadline for each board to develop a procedure that at a minimum incorporates
  - A commitment to support employee mental health in the workplace
  - Opportunities for staff to provide feedback, including anonymous feedback, on employee mental health
  - At a minimum, annual communication to school district personnel (in handbook or other accessible format) that provides information on mental health resources and support available to staff, and a description of district-level support to employees related to mental health, if available
  - Opportunities for the board to receive information regarding employee mental health initiatives and programs, which may include reports to the board or communications from the superintendent to the board



Copyright 2026, Himes, Petrarca & Fester, Chtd.



# Parent Teacher Advisory Committee PA 104-430

- The committee develops with the Board policy guidelines on student discipline, including school searches and bullying prevention
- Updates the definition of the composition of the committee
  - “composed of equal representation by a school district, its parents, and its teachers”
- Requires teacher representatives to be chosen in cooperation with teachers or their exclusive bargaining unit
- Mandates annual reviews of student discipline policies and staff safety in accordance
- In the context of suspension or expulsion
  - Gross disobedience or misconduct is defined by board policy, in collaboration with the PTA Committee



Copyright 2026, Himes, Petrarca & Fester, Chtd.

# Continuing Education Coursework
# PA 104-0975



- Beginning July 1, 2026, changes the requirements regarding continuing education coursework used for teacher salary increases
- “continuing education coursework”
  - Graduate-level – applied towards a masters, education specialist degree, or doctoral degree
  - Degree-eligible credit
  - Taught by instructor of record – holds a masters degree or higher
  - Completed by licensed classroom teacher for purpose of salary advancement under CBA
- Continuing education coursework includes PD sequences that are approved by ISBE or an industry-recognized credential
- Applies only to individuals holding a valid PEL, not including administrators or those not covered by a CBA pertaining to teachers
- Does not require the creation of a salary schedule for continuing education coursework
- Standards for documentation, transcript verification, institutional accreditation, salary advancement, and compliance monitoring are to be determined by each District


Copyright 2026, Himes, Petrarca & Fester, Chtd.

# TRS 6% Exceptions
# PA 104-0544

- Update adds explicit, permanent exceptions to prevent the District from being penalized for paying teachers for extra classroom duties in excess of a 6% increase during their final four years
- Excluded categories
  - Overload work
  - Summer school
  - Stipend work
- Overload, summer school or stipend work may become more competitive for Tier 1 teachers near retirement
  - Unions may look to establish language governing how assignments are distributed



Copyright 2026, Himes, Petrarca & Fester, Chtd.

# Changes to Expulsion
# PA 104-0546

- Prohibits expulsions for K-2, except in situations involving dangerous weapons or firearms
- Places limits on K-2 suspensions lasting longer than 3 days
  - The Superintendent's approval is required for suspensions lasting longer than three days, if no approval is received by the third day, the student returns to school on the fourth
  - If Superintendent provides approval, the suspension cannot be longer than the # of days required by the District to review, amend, develop or implement a BIP or safety plan
- Districts are prohibited from using mandatory zero-tolerance policies that force automatic suspensions longer than three days
- K-2 students may only be placed in out-of-district alternative learning opportunity programs for up to 90 days






Copyright 2026, Himes, Petrarca & Fester, Chtd.

# Graduation Requirements

- Applies to entering freshman for the 2028-29 school year
- Illinois has been steadily expanding its career-pathway infrastructure
- Under existing requirements, beginning with the 24-25 school year, students must complete one year from a variety of electives
- Established alternative pathway in which students can satisfy foreign language graduation requirements by completing two approved CTE courses
- Authorized coursework must be approved by ISBE under recognized programs of study
- Completing the two years of CTE or foreign language also satisfies the existing one-year elective requirement for music, art, or speech and debate
- Things to consider:
  - Whether existing CTE programs can accommodate additional enrollment
  - Whether additional instructors will be needed
  - Transportation
  - Capacity of rooms and equipment
  - Training counselors on which courses qualify





Copyright 2026, Himes, Petrarca & Fester, Chtd.

# Ensuring Success in School

- Requires school districts to adopt trauma-informed policies, privacy protocols, and support services for vulnerable student populations
- Covers “ESS Students”
  - Students who are expectant parents
  - Students who are parents
  - Students who are victims of domestic violence
  - Students who are victims of sexual violence
- Immediately and every two years thereafter Districts shall review and revise all existing policies that may be a barrier to the immediate enrollment and reenrollment, attendance, graduation, and overall success of ESS students
  - Should create new policies if their existing policies do not sufficiently support ESS students
- Must designate or appoint one staff at each school (social worker, nurse, psychologist, counselor, or administrator) to address the needs of any ESS student and connect them with appropriate services
- Maintain complaint-resolution procedure with confidentiality protections and trauma-informed processes
- Must provide in-school support services and allow ESS students to make up work
  - Supports must be offered for as long as necessary to maintain the mental and physical well-being and safety of the student
- Must provide information regarding non-school based support services
- Must update attendance policies to recognize “valid cause” for absences
  - Valid cause: includes attendance at a verified medical or therapeutic appointment or with a victim services provider, fulfilling parent responsibilities, and addressing circumstances resulting from domestic or sexual violence for students who are victims of such violence





Copyright 2026, Himes, Petrarca & Fester, Chtd.

# Alyssa's Law

- Becomes effective January 1, 2027
- Mandates that Districts consider mobile panic alert systems (silent alarms) in their emergency planning by the 2028-29 school year
- Does not require the implementation of any systems
- If implemented, the system must be capable of connecting to diverse emergency service technologies in order to ensure real-time coordination between first responder agencies
  - Shall be capable of integrating with local infrastructure for 911 calls and mobile activations
- State Police shall develop rules for such systems to qualify as Alyssa's Alert systems
- Any associated costs must be covered by the District






Copyright 2026, Himes, Petrarca & Fester, Chtd.

# CELL PHONE BAN P.A. 104-0657

Purposes:

- Create distraction-free classroom so that students are more engaged in lessons
- Allow educators to focus on teaching rather than on classroom management
- Reduce negative mental health impacts on students of cyberbullying, social media and negative self-image
- Encourage students to interact more with educators and peers which is essential to social development



# COVERS “WIRELESS COMMUNICATION DEVICES”

- As defined in the Act, the ban covers any portable wireless communication device that has the capability to provide voice, messaging or other communication between 2 or more parties, including but not limited to: cell phones, tablets, laptops, gaming devices and wearable devices (e.g., smart watches, smart glasses) unless those devices have disabled capability to transmit communication.
- EXCEPTION: Any device that a district or teacher has directly issued to, provided for or required a student to use  for educational purposes.



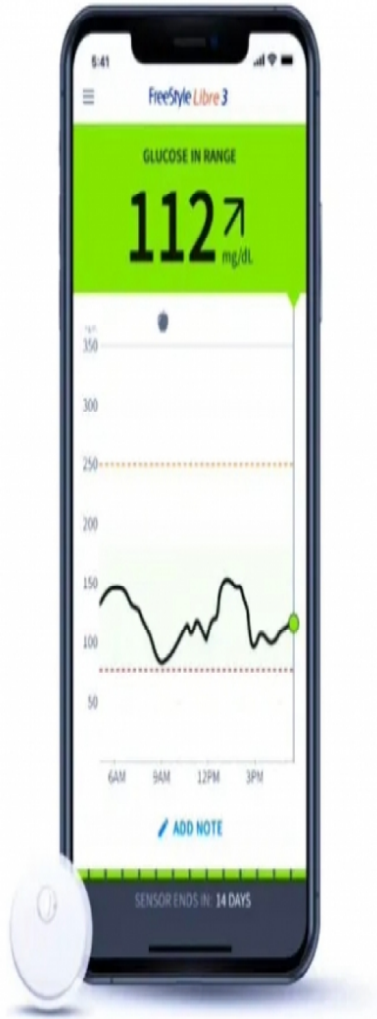
# BAN DURING “SCHOOL TIME”

- “School time” means the time students spend on a school campus during the regular school day, beginning with arrival through dismissal, including instructional time, recess, lunch and passing periods.
- “School time” does not include a before or after school activity or an off-campus learning activity.
- DISCRETIONARY EXCEPTIONS:
  - High Schools may exclude lunch and passing periods from ban
  - In the event of emergency as detailed in District emergency and crisis response plan
  - School personnel have authorized  student use for educational purposes



# EXCEPTIONS TO USE OF WIRELESS COMMUNICATION DEVICE

- Physician, Physician asst. or nurse practitioner determines device is necessary to manage student's health care and student uses device only as prescribed
- As required by IEP or 504 Plan or other accommodation plan
- Necessary for English Learner to access learning materials
- School determines that device is necessary for a student who is routinely responsible for care of a family member
- Possession or use is required by state or federal law
- Use in emergency as authorized by district's emergency crisis and response plan
- School personnel have authorized a student to use device for educational purposes



# REQUIRED POLICY ON OR BEFORE 2027-2028 SCHOOL YEAR

- Prohibits students from using device during school time
- Incorporates guidance for device storage within the school building during school time
- States the importance of uniform enforcement and implementation in a trauma informed, developmentally appropriate manner
- If requires parent to pick up a device due to student's violation, provides an alternative if parent is unable to pick up the device.
- May not enforce ban through fees, fines, out of school suspension, expulsion or deployment of SRO or police, **except** if device used in other gross disobedience



# OTHER POLICY REQUIREMENTS

- Policy must include input from union, administration, parents and student input is encouraged
- Policy must be included in student handbook and posted on website
- Must be reviewed at least once every 3 years
- If district already has a policy in place that limits device use for all or majority of the school day, the district may keep that policy in place through the 2030-2031 school year, at which time the district must adopt a policy consistent with the Act
- Board of Education and school personnel are immune for any liability from damage to a device if the device is stored in good faith and in accordance with policy unless damage is due to school personnel's willful or wanton conduct



# MODEL CELL PHONE POLICY (ISBE August 2026)

- Provides template, examples and implementation checklist
- Can use or supplement PRESS policy
- Sample storage locations:
  - Locker
  - Secured pouch
  - Classroom storage
  - Backpack or personal bag
- Sample administrative disciplinary response:
  - Verbal reminder or redirection
  - Conference with student
  - Parent notification and retrieval with alternative procedure if parent cannot pick up device



# BEST PRACTICES FOR TWICE EXCEPTIONAL STUDENTS P.A. 104-0822 (eff. immediately)

- Provides suggested best practices for students with disabilities eligible for a Section 504 Plan who are also gifted, talented or accelerated, such as individualizing services, providing appropriate academic challenge, focusing on student strengths, flexible grouping of students, allowing flexibility to show mastery, grading by learning objectives, using a strength-based approach, oral questions, extended time, formal and informal assessments, and assessment procedures that accommodate language and cultural differences.
- The Act also encourages using remote educational programs as appropriate.
- Permits a Board of Education to adopt a policy allowing development of a written educational plan to address the needs of twice exceptional students through individualized services, goals and objectives.



# TRUANT MINOR P.A. 104-0743 (eff. immediately)

- NEW: A District must make at least 3 documented attempts to notify the parent of its intent to administratively withdraw a student for nonattendance before withdrawing the student.
- A truant minor may not be withdrawn for nonattendance unless:
  - student has accrued 15 days of consecutive absence without valid cause; and
  - student cannot be located by the district OR the district located the student but, after exhausting all available support services, cannot compel the student to return to school.



# SERVICE ANIMAL TRAINING
# P.A. 104-0628 (eff. 1/1/27)

Training for teachers, administrators and school support personnel on protections and accommodations for students under the Americans with Disabilities Act must include service animals beginning in January 2027.



# FEDERAL AND STATE GUIDANCE

# P. A. 104-0032: STUDENT MENTAL HEALTH SCREENING FOR 2027-2028 SCHOOL YEAR

- Mental health screenings for students in grades 3 through 12 must be offered by school districts at least once per year, beginning in the 2027-2028 school year.
- School districts can apply for an extension to a later school year if the district satisfies criteria to be determined by ISBE.
- The requirement to offer mental health screenings will apply to school years in which ISBE makes available a screening tool at no cost to districts that includes a self-report option for students.



# UNIVERSAL MENTAL HEALTH SCREENING NON-REGULATORY GUIDANCE (ISBE August 2026)

- Implementation Guide and Steps for Screening
- MTSS tiered interventions for mental health
- Sample checklists
- Description of 4 frequently used screeners
- Other resources



# ISBE NON-REGULATORY GUIDANCE
# Implementation Guide and Steps for Screening

Step 1: Establish a School Implementation Team:

- Plans the screening process including timelines and consent procedures
- Designs and oversees administration of screening tools
- Interprets and uses screening results to inform decisions
- Coordinates services and follow up supports, including referrals, progress monitoring and collaboration with families and community providers
- ISBE suggests using  MTSS team, Student support team or other team addressing student behavior or mental health needs
- Typically includes administrators, mental health and support personnel (social worker, psychologist, counselor, nurse) and parents



# ISBE NON-REGULATORY GUIDANCE
# Implementation Guide and Steps for Screening

Step 2: Plan Mental Health Screening Communication

- Obtain informed parental consent by clearly communicating the voluntary nature of screening and outlining how consent can be provided, declined or withdrawn
- Clearly explain the purpose, process and benefits of screening
- Explain that students' rights to privacy and decision making varies by age
- Have a protocol for communicating results and outlining next steps



# ISBE NON-REGULATORY GUIDANCE
# Implementation Guide and Steps for Screening

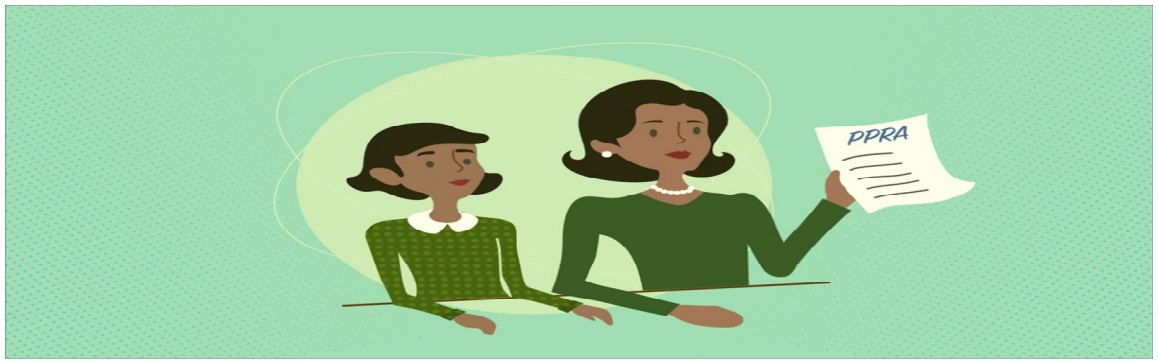
Step 3: Develop Implementation Policies and Procedures

- Board of Education should adopt policy for obtaining consent for screening
  - School Code allows for opt in or opt out model
  - BUT consider Protection of Pupil Rights Amendment requirements
  - Districts should also provide information to and obtain consent from students age 12 and over to complete screening
- Adopt policy on disclosure of student data
- Under Local Governmental and Governmental Employees Tort Immunity Act, districts are generally not liable for negligence in administration, scoring or interpretation of screening tools, but ISBE cautions that there may be liability for willful and wanton conduct such as ignoring clear indicators of a student in crisis or failure to implement appropriate response protocols



# DEAR COLLEAGUE LETTER (USDOE STUDENT PRIVACY POLICY OFFICE August 26, 2026)

- Mental Health Screenings are instruments that elicit information that falls within the “mental or psychological problems of the student or the student’s family” category that is protected under the Protection of Pupil Rights Amendment (PPRA)
- Parental consent requirement applies whether or not a survey is exclusively or directly administered with federal funds
- Therefore, schools may not administer a mental health screening without prior written parental consent
- Schools must also provide parents an opportunity to inspect and review the survey before their minor child participates in the survey
- Failure to comply with PPRA may result in loss of federal funding



# ISBE NON-REGULATORY GUIDANCE
# Disclosure of Student Screening Results

- Student under age 12: parent has full access and consents to disclosure
- Student age 12-17: student consents to disclosure; parent access may be limited
- Student age 18 or above: student consents to disclosure; full rights to mental health records
- Special education exception that parent of a minor who consented to special education services is entitled to inspect and copy records of mental health services to which the parent consented



# ISBE NON-REGULATORY GUIDANCE
# Implementation Guide and Steps for Screening

Step 4: Administer the Screening Tool

Step 5: Conduct Follow-up Process

- ❑ appropriate professionals score screening tool
- ❑ promptly communicate to parent any concerning screening results or warning signs
- ❑ MTSS Tiered interventions

Step 6: Evaluate the screening process



# Dear Colleague Letter

- August 18, 2026
  - The DOE issued a directive instructing federally funded educational institutions to immediately cease using race preferences, quotas, and disparate impact frameworks when determining student discipline
  - Rescinds previous federal guidance, explicitly stating that using “disparate impact” was flawed. Returned to localized disciplinary control to school boards in order to focus on campus safety
  - Alongside the letter, the USDOE OCR announced aggressive Title VI enforcement investigations targeting districts that explicitly directed teachers to weigh racial disproportionality or systemic “whiteness” when deciding when to suspend or discipline a student

Copyright 2026, Himes, Petrarca & Fester, Chtd.

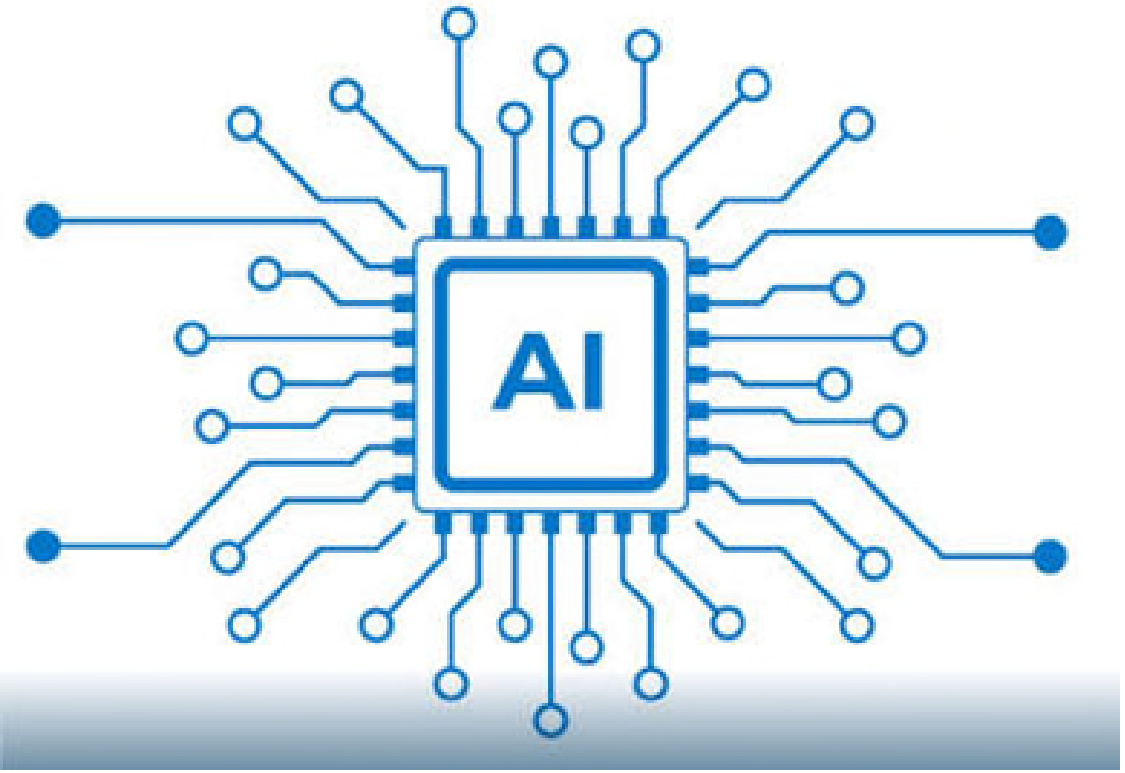
# Guidance on Ticketing in Schools

- Prohibits ticketing as a form of school discipline
- Cuts off the “ticket referral” workaround
  - Schools may not refer students to SROs, police or municipal departments for the purpose of imposing a ticket, fine, fee or citation
  - Beginning in the 2027-28 school year, Districts must report student referrals to law enforcement to ISBE
- Includes a prohibition on ticketing on school transportation
- Routine misconduct should be handled internally
  - The District’s code of conduct, educational interventions, restorative practices, and other school-based supports should be used to address conduct such as vaping, minor fights, or truancy
- Law enforcement will remain available for safety purposes
  - No prohibition on the use of law enforcement when there is a legitimate safety or legal need
- SRO agreements required
  - Effective July 1, 2026, districts using SROs must have an MOU with the local law-enforcement agency that expressly prohibits SROs from ticketing or giving citations and addresses SRO roles, training, data reporting, and program oversight
- Districts should review and update their discipline policies, eliminate municipal-ticket referral practices, clarify SRO roles, and train administrators on the new limits of ticketing within schools




Copyright 2026, Himes, Petrarca & Fester, Chtd.

# ISBE Artificial Intelligence Guidance




- Anchored in four core tenets
  - Teaching and learning are grounded in human relationships
  - Schools serve academic, developmental, and civic purposes
  - AI is a means to inform teaching and learning, not an end in itself
  - Effective use requires deliberate, locally determined purposes and oversight
- Declines to establish state mandates, rather it leaves AI implementation to the discretion of local districts
- Encourages districts to teach students how AI works, recognize its limitations, and distinguish between how to harness it and when it is being used for academic dishonesty
- Advises Districts to consider the age groups and maturity of students who will be using the programs
  - P-2, 3-5, 6-9, 9-12
- Emphasizes that AI is a tool to support teaching and learning
  - Teachers possess the professional knowledge to appropriately make decisions about what particular students require to learn

Copyright 2026, Himes, Petrarca & Fester, Chtd.



# SIGNIFICANT CASE LAW

# E.W. by Johnson v. Board of Education of East St. Louis School District No. 189




- State law requires Districts to provide free bus transportation to nonpublic school students who live within the district boundaries and attend a school located within the district boundaries, but who live more than 1.5 miles from their school *105 ILCS 5/29-4*
- Issue: whether a District must alter its existing bus routes to provide transportation for eligible nonpublic school students, or whether its obligation is limited to transportation provided along existing routes



Copyright 2026, Himes, Petrarca & Fester, Chtd.



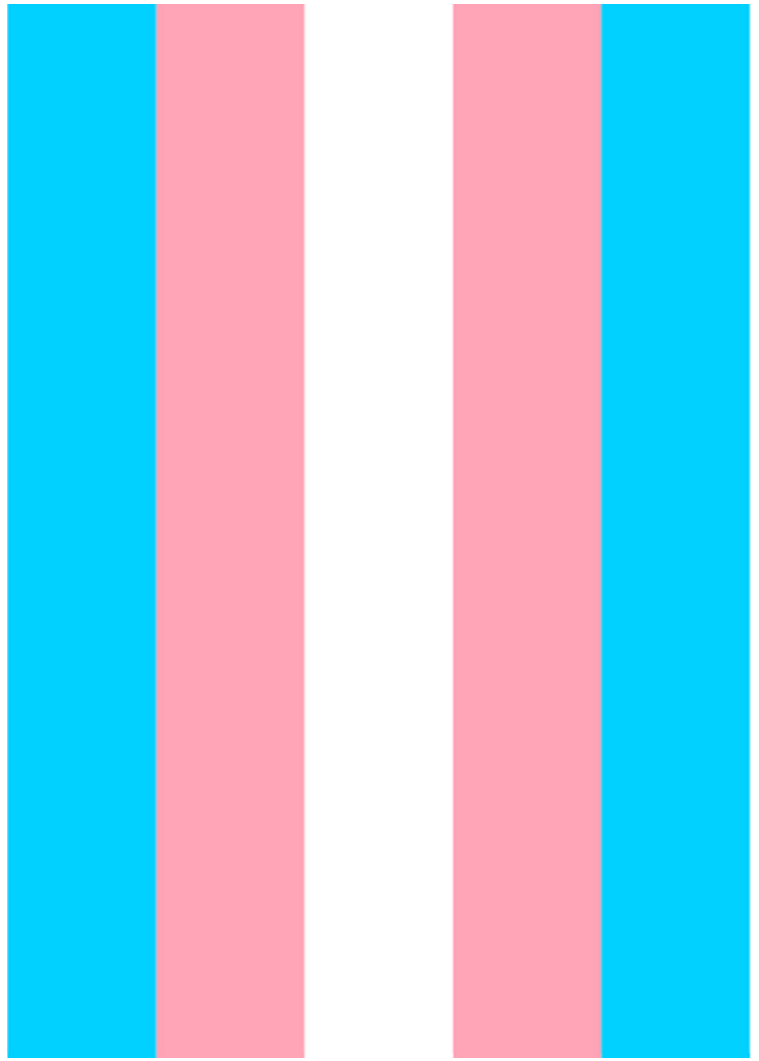

# E.W. by Johnson v. Board of Education of East St. Louis School District No. 189

- District argued that it needed to redesign its public-school bus routes to account for a shortage of bus drivers
  - The new routes no longer allowed buses to stop at the nonpublic school students home
- The opinion clarified that the law does not require District to alter their bus routes to accommodate private school children, rather, it only requires schools to pick up and drop off students at the locations along the District's regular routes that are closest to the private schools and the student's homes
  - Section 29-4 does not command a local district to create new routes or to modify its regular routes to accommodate transporting nonpublic schoolchildren from their place of learning



Copyright 2026, Himes, Petrarca & Fester, Chtd.

# West Virginia v. B.P.J. by Jackson

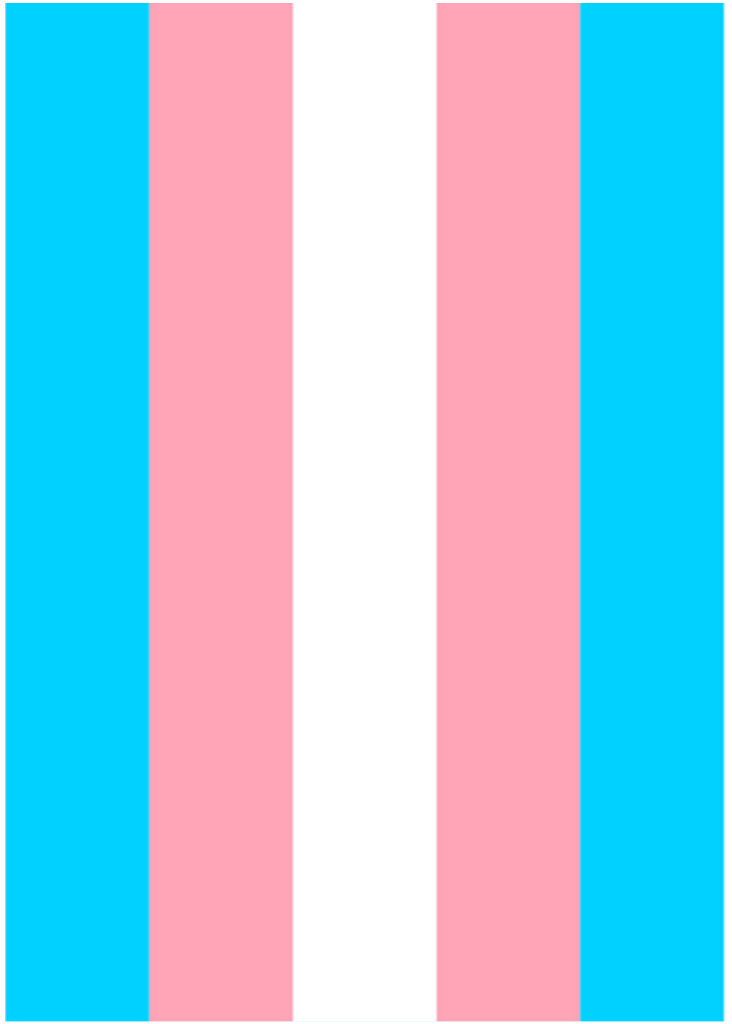


- Transgender female student brought action against WV State Board of Education, alleging state law that determined eligibility for female sports based on “biological sex,” based solely on the individual’s reproductive biology and genetics at birth, violated Title IX and the Equal Protection Clause
- Supreme Court held that WV permissibly maintained women’s and girls’ student sprots teams for “biological females,” without violating Title IX or the Equal Protection Clause
  - Effectively creates a patchwork, whether states can restrict sports eligibility to biological females but that are not required to do so
- Found that Title IX allows separate teams based on biological sex without mandating inclusion policies for transgender identities
  - Settled the debated question on the scope of Title IX – refers to biological sex rather than gender identity



Copyright 2026, Himes, Petrarca & Fester, Chtd.

# West Virginia v. B.P.J. by Jackson



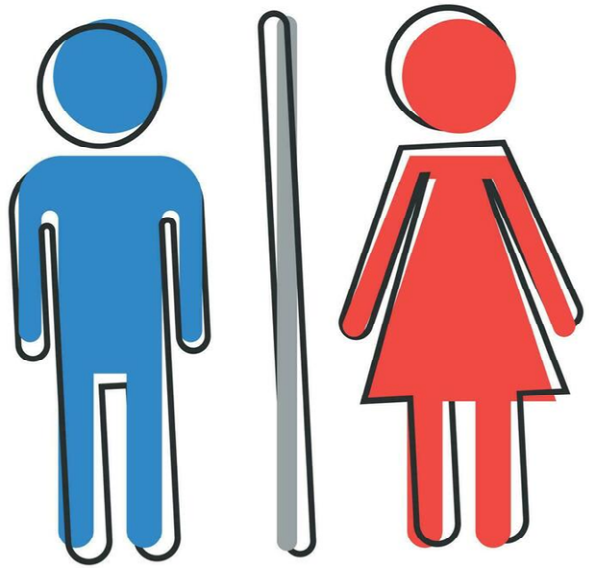
- Concluded that the state's classification substantially furthers important governmental objectives regarding athletic safety and competitive fairness
- The equal protection Clause does not require the Court to make individualized exemptions for transgender students, who had taken puberty blockers or hormones, from the laws' permissible sex-based classification
- Despite recent federal rulings that allow other states to enact bans, Illinois affirms the IHSA policy that the IHRA requires that transgender athletes be permitted to participate in events and programs that align with their gender identity



Copyright 2026, Himes, Petrarca & Fester, Chtd.

# F.F. v. Valley View Community Unit School District No. 36

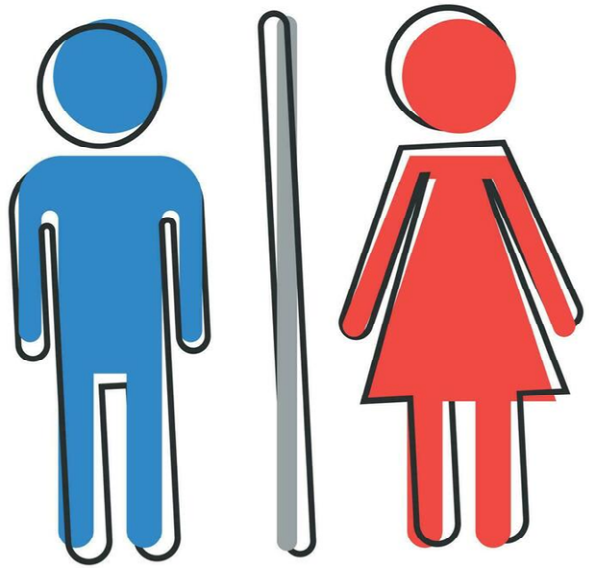
- IDHR policy required that schools permit students to use the bathrooms aligned with their gender identity and explicitly stated that discomfort or privacy concerns were not reasons to deny a student access to those bathrooms
- A female student (F.F.) encountered a transgender student in a girls' restroom
  - The student's restroom access was authorized pursuant to an individualized accommodation plan and consistent with IDHR guidance
  - The District offered F.F. accommodations to resolve her privacy concerns
- F.F.'s father filed class-action lawsuit claiming the District's policy violated cisgender female students' privacy rights and Title IX protections
  - The court denied the request for temporary and preliminary injunctive relief





Copyright 2026, Himes, Petrarca & Fester, Chtd.

# F.F. v. Valley View Community Unit School District No. 36



- District Judge dismissed the suit, noting that “sex-segregated facilities are allowable, not required” and stated that girls do not have a federal civil right to restrooms that completely exclude transgender students.
  - Relied heavily on Whitaker v. Kenosha Unified School District and A.C. v. Martinsville
- Consistent with the Seventh Circuit’s prior rulings in favor of transgender student access to the bathrooms of the gender they identify with



Copyright 2026, Himes, Petrarca & Fester, Chtd.

# 7th Circuit Shifts

- The 7th circuit has historically protected transgender students
- Recently the court has faced immense pressure from anti-trans advocacy groups
- In July 2026, the 7th circuit granted a full 11-member en banc review regarding multi-state transgender healthcare dispute
    - Breaking from their refusal to hear the appeal, and the traditional 3-member panel
- The 7th circuit seems to be following the Supreme Courts recent decisions in West Virginia v. B.P.J. and Little v. Hexcox
    - The Supreme Court ruled that states have the authority to maintain women's and girls' sports teams exclusively for biological females.



Copyright 2026, Himes, Petrarca & Fester, Chtd.

# SEVENTH CIRCUIT: LEAST RESTRICTIVE ENVIRONMENT

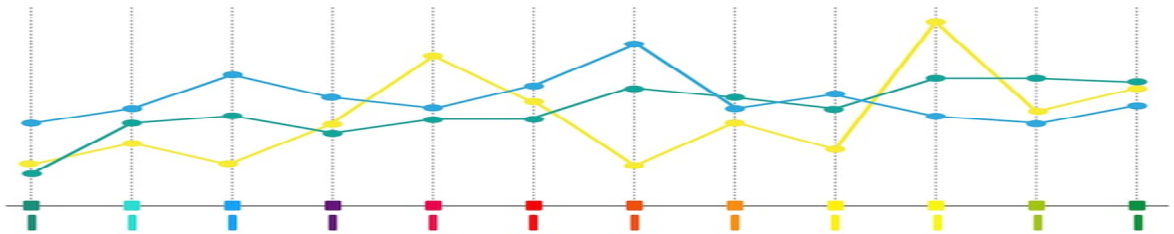
***N.T and P.T. v. Galesburg Cty. Unit Sch. Dist. No. 205, 126 LRP 12580 (7th Cir. 2026)***

First grade student exhibited aggression, elopement, and work refusal. District completed an FBA and then placed the student diagnostically in its ED classroom while evaluating the student and developing an IEP. Three weeks after the IEP was developed, the District proposed placement in a therapeutic day school. Parents filed due process and argued for the ED classroom with an aide.

The IHO ruled in favor of the District at the due process hearing, but the district court considered evidence of the student's subsequent progress in the classroom and reversed the IHO.

The Seventh Circuit considered the ED classroom with an individual aide less restrictive than a therapeutic day school 45 minutes from the student's home. LRE test is whether, with interventions, student is unable to be satisfactorily educated in less restrictive setting.

Take away- keep data on behaviors and try different interventions for a sufficient time period to show if student is making satisfactory progress in current setting.



# SEVENTH CIRCUIT: PARENT VOLUNTEERS

***Henson v. Dwight Common Sch. Dist. No. 232, 2026 WL 2170864 (7th Cir. 2026)***

Parent filed application to be placed on district's "Approved Volunteer List" to be a chaperone for his child's school events. His application was rejected and Superintendent explained that applicants with a criminal history are denied approval.

Parent sued the district arguing that he was denied procedural due process. He was deprived of his protected liberty interest, and the district violated his right to equal protection by excluding him without an individualized review of his circumstances.

The Seventh Circuit affirmed the district court and held that a parent does not have a fundamental right to volunteer at his or her child's school and that the district's policy of excluding applicants with a criminal history satisfied the rational basis of ensuring student safety.





# QUESTIONS