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Law Firm, P.C.

School Law Notes

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Don't be a Grinch: Tips to Handle the Holidays

Every year, school officials unwrap the dilemma of how schools can celebrate the winter holidays without landing on the constitutional naughty list. School celebrations occasionally involve religious content implicating the First Amendment's Establishment Clause. Under the Establishment Clause, a school must maintain religious neutrality and therefore cannot endorse or promote one religion over another.

In 2022, the U.S. Supreme Court struck down the prior test that courts had used for decades to analyze Establishment Clause cases. The Court did not establish a new test in its place, instructing that the Establishment Clause must be interpreted by "reference to historical practices and understandings." Given the lack of clear guidance, school officials should proceed with caution during the holiday season. Below are our recommendations for enjoying the season.

Diversify Content

Whether a school display, lesson, or performance violates the Establishment Clause depends on the full context of the material. When secular holiday symbols (like Santas and reindeer) are equally depicted with religious symbols from different faiths (such as a cross, creche, or menorah), a court is less likely to find an Establishment Clause violation. Similarly, a display or performance that includes religious content should represent multiple religions, as diverse content can illustrate the overall culture of the season rather than a school's endorsement of a particular religion.

In recognition of religious music's artistic merit, courts have consistently rejected the idea that all religious music must be banned from school performances. In contrast, a performance of only devotional Christmas music without secular songs or music from other religions may be construed as an endorsement of religion, violating the Establishment Clause.

Teach – Don't Ritualize

Courts have long acknowledged the educational benefits of teaching about different religions and their holidays and symbols. Teachers may provide instruction about religious holidays, but they must ensure that no lesson or content endorses or promotes religion. The focus should be on the origin, history, and the generally accepted meaning of the religious holiday rather than a ritual observance.

Accommodate Opt-Out Requests

Some parents and students may object to school-sponsored holiday activities. School officials should honor parental requests to excuse a student from those activities. Students who opt out must not be ostracized or penalized. For example, if a school choir intends

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to perform holiday songs at a church, students should be permitted to opt out of the performance without affecting their grades or placement in the choir. School officials should also be mindful that the absence of objecting students is not an opportunity to convert an otherwise educational activity into a religious celebration.

Don't Discriminate

School officials must remember to remain neutral about religious displays of personal faith. If a school permits secular holiday attire and decorations, religious attire and decorations must be permitted on equal terms. For example, a student cannot be excluded from their class's holiday sweater party for wearing a sweater that says, "Jesus is the reason for the season."

We encourage school officials to proceed cautiously as they navigate this holiday season and to follow these tips to help avoid a fa-la-la-lawsuit.

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USDOE Highlights FERPA & PPRA Compliance Concerns

On August 26, 2026, the U.S. Department of Education's (USDOE) Student Privacy Policy Office (SPPO) issued guidance (Guidance) to state school officers and superintendents concerning their legal obligations under the Family Educational Rights and Privacy Act (FERPA) and the Protection of Pupil Rights Amendment (PPRA).

FERPA grants parents the right to review, inspect, and amend their child's education records and to restrict disclosure of those records, with certain exceptions. The PPRA gives parents the right to opt their child out of certain surveys and physical examinations and to inspect instructional and curricular materials. Failure to comply with these statutes can result in withheld federal funds.

The Guidance reminds school officials of their legal obligations under FERPA and the PPRA and highlights the following compliance concerns:

PPRA Compliance

The Guidance emphasizes issues with schools' PPRA compliance, particularly concerning parental consent.

Under the PPRA, students cannot be required to submit to a survey, evaluation, or analysis that concerns one or more of the following protected areas without parental consent:

1. the student's or parent's political affiliations or beliefs;
2. the student's or student's family's mental or psychological problems;
3. sex behavior or attitudes;
4. illegal, anti-social, self-incriminating, or de-meaning behavior;
5. critical appraisals of other individuals with whom survey respondents have close family relationships;
6. legally recognized privileged or analogous relationships, such as relationships with lawyers, physicians, and ministers;
7. the student's or parent's religious practices, affiliations, or beliefs; or
8. income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).

In the Guidance, the USDOE stressed that any mental health screening instruments that require students to answer questions about their emotional wellbeing, internalized distress, social interactions, and other indicators of psychological or mental states or conditions, fall within the PPRA's protected category of "mental or psychological problems of the student or the student's family." Before administering a mental health screening, school officials should determine whether the PPRA requires prior parental consent.

According to the Guidance, the USDOE considers any school-administered survey, evaluation, or analysis to be "required," because asking students to decide for themselves whether to participate may subject them to peer pressure, fear of repercussions, a desire to please a favored teacher, or subject them to the influence of a teacher's or school official's authority.

The Guidance interprets the PPRA's parental consent requirement as applying to all surveys, evaluations, and analyses regardless of whether they are administered exclusively or directly with USDOE funds. This interpretation reflects the USDOE's seemingly broader application of the PPRA's parental consent requirement than it previously articulated. Accordingly, this shift may result in increased enforcement activity.

Annual Notifications

The Guidance alleges that many schools are not properly notifying parents of their FERPA rights. It reminds school officials that they must annually notify parents of these rights. This notice may be sent to parents *en masse* and can be transmitted by any means that is "reasonably likely to inform" parents of their rights, such as by publication in the school calendar, newsletter, student handbook, or school website.

Sample notices can be found at SPPO's Annual Notices webpage.

Parental Right to Inspect and Review

The USDOE also suggests that many public-school policies and practices conflict with FERPA's inspect-and-review rights afforded to parents.

As an example, the USDOE explains that, after recent investigations, it found "many schools create 'gender plans' for students and assert these plans are not 'education records' under FERPA and therefore must be inaccessible to the parent." The USDOE reiterates earlier guidance on this issue from its 2025 Dear Colleague Letter that FERPA requires schools to provide parents with the opportunity to inspect and review all education records of their child upon request. The USDOE emphasizes that FERPA does not distinguish between a student's "official record," "cumulative file," or "unofficial records." The determining factor is whether the information is directly related to a student and maintained by the educational agency or institution. If so, the parent must be permitted to inspect and review the record.

Outsourcing Institutional Services & Functions

The Guidance addresses FERPA's "outsourcing" provisions, which allow schools to disclose personally identifiable information from students' education records to contractors, consultants, volunteers, and other third parties.

FERPA prohibits schools from disclosing to third parties personally identifiable information from a student's education records unless: (1) the student's parent/guardian (or the student if 18 or older or an emancipated minor) provides written consent; or (2) a statutory exception allows disclosure without consent.

One statutory exception allows schools to disclose education records to a "school official" who has a legitimate educational interest in the record without obtaining a parent's or eligible student's consent. A third party qualifies as a school official under FERPA if the third party: (1) performs an institutional service or function for which the school would otherwise use employees; (2) is under the direct control of the school with respect to the use and maintenance of education records; (3) is subject to FERPA's requirements governing the use and redisclosure of personally identifiable information from education records; and (4) meets the criteria in the school's annual FERPA notice to be considered a school official with a legitimate educational interest.

If a third party does not qualify as a school official under FERPA, the school may only disclose directory information for those students whose parents have not opted out unless the school has obtained prior written consent.

Use of Online Educational Services

The Guidance also discusses the increasing use of online educational service providers. As a reminder, student information only may be disclosed to an online educational service provider in compliance with FERPA. In general, that requires compliance with the "school official" exception discussed above. For more guidance on the use of online educational services in the classroom, the USDOE directs school officials to the "Protecting Student Privacy While Using Online Education Services: Requirements and Best Practices" webpage.

Military Recruiters

Finally, the USDOE reminds school officials that the Elementary and Secondary Education Act gives military recruiters the same access to secondary students as provided to college recruiters or to prospective employers and requires that schools provide student information, including student names, addresses, electronic mailing addresses, and telephone listings, when requested, unless a parent has opted out.

For Thrun Policy Service subscribers, relevant policies include Policy 5308 (Protection of Pupil Rights) and Policy 5309 (Student Records and Directory Information).

If you have questions regarding FERPA, the PPRA, or the information in the Guidance, please contact a Thrun student issues attorney.

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Refusing to Take No for an Answer: Special Education Evaluations and the Override Process

Generally, the Individuals with Disabilities Education Act (IDEA) requires parental consent for student evaluations and the initial provision of special education services. The ability to evaluate is centrally important to meeting a student's educational needs. For instance, a student cannot be eligible for special education services until there has been an initial evaluation. If a student is already eligible for special education services, a school is required to conduct a review of existing evaluation data (REED) every three years, to determine whether additional evaluation data is needed.

When a parent refuses to consent to an initial evaluation or reevaluation, the school is not responsible for the consequences of that refusal. However, an Individualized Education Program (IEP) Team may decide it is not able to provide appropriate special education services to a student without evaluation data. In those cases, the IDEA offers a discretionary mechanism to school officials to seek to

override a parent's refusal to consent. An override also may be considered when the school members of an IEP Team have evidence that the student is no longer eligible for special education or related services, because a student cannot be exited from services without an evaluation.

The override process may be used when a parent refuses to consent to an evaluation, but not when a parent refuses to consent to special education services. A school is never obligated to seek an override of a parent's refusal to consent to evaluation, but if it does so, it must file a due process complaint against the parent. This action requires the school to retain legal counsel, who will prepare a complaint and file it with the Michigan Office of Administrative Hearings and Rules. The parties then participate in a hearing before an administrative law judge (ALJ) and must present evidence and testimony. At the conclusion of the hearing, the ALJ may order an evaluation without parental consent.

To prevail in an override lawsuit, the school must demonstrate that the student's educational needs have changed to such an extent that the student needs to be assessed. A school seeking an override for an already-eligible student should present evidence that the current evaluation data is insufficient to determine the student's programmatic needs. For example, in a 2024 Massachusetts due process hearing, the ALJ agreed with the school that a student's severe behaviors, including aggression and elopement, warranted an override reevaluation because the behaviors interfered with the student's ability to make educational progress.

A Michigan school district filed a due process override complaint against a family because there was a dispute about the student's least restrictive environment and the parents refused to consent to a reevaluation. The school had data indicating that the student needed placement in a special education program with a low student to teacher ratio and a modified curriculum. The parents believed that by refusing to consent to reevaluation, they could undermine the school's ability to offer a placement they did not want. The ALJ agreed with the district and determined that a reevaluation was critical to provide the student with appropriate programming.

If special education staff would like to pursue an override to evaluate a student, you may reach out to a Thrun special education attorney to help you through the process.

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Education Freedom Tax Credit SGOs

Under the new Education Freedom Tax Credit (EFTC) program beginning on January 1, 2027, taxpayers can make contributions to Scholarship Granting Organizations (SGOs) in exchange for a tax credit. States must choose whether to opt in to the initiative. Notably, Michigan has not yet declared whether it will opt in. This article explains the basic framework for this new initiative so school officials can be prepared if Michigan opts in.

What are qualified education expenses?

SGOs must adhere to several restrictions to qualify for EFTC participation. Contributions may only fund scholarships that pay for certain student-incurred qualified education expenses. Internal Revenue Code (IRC) Section 530 lists qualified education expenses that may be funded by an SGO scholarship. Those expenses include tuition and fees, tutoring, special needs services, books, and other supplies that are connected to enrollment or attendance at *any* elementary or secondary school. Other eligible expenses include room and board, uniforms, transportation, and supplementary services (such as extended day services) that are required or provided by any school. The purchase of computer equipment or internet access is also an eligible expense if used by "the beneficiary or the beneficiary's family" while the student is in school.

Although the EFTC appears to primarily benefit private-school students, the legislation does not distinguish between public and private schools. Due to Michigan's constitutional obligation to provide a free public education to students, many of those qualified education expenses may not, in practice, apply to public-school students. Eligible expenses that public-school students may incur outside of their free education may include private tutoring, class trips, or pay-to-play athletics.

The EFTC initiative is generally structured to pay for qualified expenses incurred by individual students rather than directly paying schools. The SGO may pay the school directly only for certain eligible expenses such as tuition or room and board. Further, states are not permitted to impose additional conditions on SGOs that would control where SGOs distribute scholarship funds or which expenses may be covered. For instance, the State of Michigan cannot require in-state SGOs to assist only Michigan public-school students.

Establishing an SGO

An SGO must be a distinct nonprofit corporate entity recognized by the IRS as a 501(c)(3) organization, cannot be a private foundation, and must satisfy several statutory requirements before it grants its first scholarship.

The SGO incorporators must, among other requirements: (1) draft and file articles of incorporation, bylaws, and governance policies, and apply to the

IRS for 501(c)(3) status; (2) establish a board of directors; (3) obtain an Employer Identification Number; and (4) establish a banking and accounting infrastructure that maintains separate accounts to avoid any commingling of corporate operational funds with taxpayer contributions.

The U.S. Department of Treasury has proposed federal regulations for guidance and clarification concerning these requirements. Under the proposed regulations, an SGO must:

- prevent the commingling of qualified contributions and other organization funds;
- avoid awarding scholarships to disqualified persons;
- be included on the state's SGO list;
- satisfy reporting requirements; and
- abide by the operational requirements under the statute.

SGO operational requirements include:

- providing scholarships to at least 10 students who do not all attend the same school;
- spending at least 90% of organization income on eligible student scholarships;
- verifying that scholarships are used solely for qualified expenses;
- awarding scholarships only to eligible students within the state according to applicable priorities; and
- avoiding designating specific contributions for any particular student.

We have received many questions as to whether a school can create its own SGO or rely on an existing educational foundation to create an SGO on its behalf. Thrun has long maintained that a public school does not have the legal authority to directly create its own nonprofit corporation, including an SGO. SGO creation should be handled by interested private parties.

Educational foundations should be cautious about adding SGO status to an existing foundation, particularly because of the requirement that 90% of income be distributed annually in the form of scholarships for qualified education expenses. If a foundation-SGO is unable to distribute 90% of its income to local students, any remaining funds must be given to qualifying students at other schools. This could mean that a foundation-SGO, originally created to benefit a particular public school and its students must grant scholarships to students attending other public or private schools to remain legally compliant.

Thrun will continue to monitor the EFTC landscape and inform our clients of relevant updates, including any regulatory clarification or a decision by the State of Michigan to opt into the EFTC.

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The Haunting Effects of Failing to File Your Qualifying Statement

Before issuing most types of debt, a school must obtain either qualified status or prior approval from the Michigan Department of Treasury. The former requires advance planning but ultimately saves schools both time and money.

Qualified Status

To obtain qualified status, school officials must complete and electronically file a Municipal Finance Qualifying Statement with Treasury by December 31 each year. If filed later than that date, qualified status still may be obtained, but Treasury will charge a $100 late fee. Once a school has been granted qualified status, it generally can borrow during the following year without any further approval from Treasury.

Before filing the Qualifying Statement, school officials must already have filed their school's annual audit with MDE. A school's June 30, 2026 audit must be filed with MDE by November 1, 2026. Specific instructions for audit submissions can be found on MDE's website.

To file the Qualifying Statement online, new users must request a username and password from Treasury. Further instructions for filing a Qualifying Statement can be found on Treasury's website. Some questions on the Qualifying Statement form (such as those related to taxes levied and delinquent taxes) may be confusing. Please read and complete the form carefully.

Upon request and free of charge, Thrun finance attorneys will review a retainer client's Qualifying Statement before it is filed. Due to the limitations of Treasury's online filing interface, to receive a Thrun review, you must send a screenshot of the completed form to your finance attorney. Please provide the screenshot by early December to allow adequate time for review before the December 31 Qualifying Statement filing deadline.

Prior Approval

Obtaining Treasury's prior approval is a more costly and time-consuming approach. If a school has not obtained qualified status for a given year, then school officials must submit a prior approval application to Treasury *each* time the school wants to borrow. Once Treasury deems the application "received," it has up to 30 business days (i.e., six calendar weeks) to evaluate it.

While Treasury may process an application more quickly than 30 business days, the prior approval process still can cause significant delays, leading to additional stress and logistical hurdles for unexpected or urgent borrowings. If your school has been denied qualified status and must submit a prior approval application, you should plan ahead and allow sufficient time to accommodate this potentially lengthy process.

Don't get spooked by these requirements! Failing to file your Qualifying Statement will most certainly come back to haunt you.

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Making Raises Count: Salary Schedules and Retirement Credit

When schools revisit or finalize employment contracts and compensation decisions, school officials should consider potential school employee retirement implications. Although schools are not required to create salary schedules, establishing a salary schedule for a job will increase the chance that an employee's base salary increases will count when the Office of Retirement Services (ORS) calculates that employee's retirement pension.

A school employee's retirement pension under the Michigan Public School Employees Retirement Act (MPSERA) is calculated based upon the employee's final average compensation (FAC), which varies by retirement plan, but is usually the employee's average three highest consecutive compensation years. If an employee's remuneration (i.e. total benefits package) is not "compensation" as defined by the MPSERA, then ORS will not use those amounts when calculating the FAC. The MPSERA states that "compensation" excludes:

> Compensation in excess of an amount over the level of compensation reported for the preceding year except increases provided by the normal salary schedule for the current job classification. In cases where the current job classification in the reporting unit has less than 3 members, the normal salary schedule for the most nearly identical job classification in the reporting unit or in a similar reporting unit shall be used.

ORS previously created "normal salary schedules," listing permissible annual salary increases for certain positions, including superintendents, assistant superintendents, and administrative assistants. In 2023, the Michigan Supreme Court held that ORS lacked authority to create salary schedules for schools, effectively delegating to schools creation of salary schedules for employee salary increases to count for retirement purposes.

As reported in the August 2024 edition of School Law Notes, the Michigan Supreme Court concluded that for employees in a job classification of three or more employees, no salary increases count for retirement purposes unless those employees are subject to a school salary schedule. For employees in a job classification of one or two employees, the Court determined that the normal salary schedule for the most nearly identical job classification in the school or in similar schools must be used.

For employees in a job classification of one or two employees, the Court did not address whether ORS must apply "the normal salary schedule for the most nearly identical job classification," even if a school has a salary schedule for that specific job classification (e.g., superintendent). That said, ORS FAQs suggest that ORS will honor school salary schedules for employees in a job classification of one or two employees.

The Court defined a salary schedule as a (1) written document; (2) approved by a school board; (3) that indicates the time and sequence of compensation; and (4) conforms to a norm, rule, or principle (i.e., it applies to a generally applicable job classification rather than to a specific employee).

ORS FAQs add that a salary schedule should contain the employee's base salary, span more than one year, and be adopted before the compensation is earned. Those FAQs also state that ORS expects a school to provide ORS with documentation supporting the date the salary schedule was established and approved by the school board.

Under Michigan law, a school board speaks only through its minutes and resolutions. Accordingly, to meet the Court's board-approval requirement, a school board should approve a salary schedule, and that approval should be reflected in board meeting minutes or a board resolution. A salary schedule on file with a school's payroll department that lacks board approval is likely insufficient.

The Michigan Supreme Court also stated that a salary schedule must apply to a *job classification* (rather than an individual employee). Neither the Court nor ORS defined the term "job classification" for MPSERA purposes. However, before the Court determined that ORS lacked authority to create salary schedules, ORS created salary schedules for superintendents, assistant superintendents, and administrative assistants, suggesting that "job classification" means position.

A salary schedule ideally should be a separate document from an individual employment contract. Although ORS FAQs state that embedding a salary schedule within an individual employment contract is

"acceptable," the FAQs are not binding law. A salary schedule that only appears in an individual employment contract, especially a salary schedule that only includes a base salary for one employee, could raise a question as to whether that salary schedule applies to a specific person or whether – as required by the Court – that salary schedule applies to a specific job classification.

When creating salary schedules, schools should be cognizant of terms in their current employment contracts, ensuring at a minimum that salary amounts listed in those contracts match salary amounts listed in the corresponding salary schedules. That diligence is especially important for employees who are in a bargaining unit, as unilaterally changing the salary of those employees may be an unfair labor practice under the Michigan Public Employment Relations Act.

To assist schools, a sample salary schedule format for certain administrators is available at the end of this *School Law Notes* edition. The sample may also be adapted for other positions. School officials who have questions about creating, revising, or implementing salary schedules should contact a Thrun Labor attorney.

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Addressing Political Speech at School

In today's polarized climate, school officials may be asked to, or feel the need to, respond to political speech affecting the school community. Because political speech is at the core of First Amendment protections and context always matters, the correct response in any situation depends on three key facts: *who* spoke, *what* was said, and *where* it was said or posted.

Employee Speech

When determining whether to discipline an employee for speech, school officials should review any collective bargaining agreement, individual employment contract, and policy provisions applicable to discipline and speech. Before those documents even come into play, however, a school must first determine whether the First Amendment prohibits discipline for the employee's speech.

To make that First Amendment determination, school officials should typically consider the following:

1. *Was the employee's speech pursuant to official job duties (e.g., during class instruction)?* If so, then the First Amendment does not prohibit discipline, and the First Amendment analysis stops. If the speech was not pursuant to official job duties, then the analysis should proceed to the next question.
2. *Was the employee's speech on a matter of private concern or public concern?* If on a matter of private concern (e.g., personal gripe), then the First Amendment does not prohibit discipline, and the First Amendment analysis stops. If the speech is on a matter of public concern (i.e., a political, social, or other community concern), then the analysis should proceed to the next question.
3. *Does the employee's interest in commenting on matters of public concern outweigh the school's interest in promoting an efficient workplace?* Applying the balancing test, courts often analyze how much disruption the employee's speech caused to the workplace. Specifically, courts typically consider whether the speech: (1) impairs discipline by superiors or harmony among coworkers; (2) has a detrimental impact on close working relationships for which personal loyalty and confidence are necessary; (3) impedes the performance of the speaker's duties or interferes with the regular operation of the enterprise; or (4) undermines the employer's mission.

The U.S. Court of Appeals for the Sixth Circuit's decision in *Bennett v Metro Gov't of Nashville*, 977 F3d 530 (CA 6, 2020), is instructive and binding in Michigan. Bennett, a dispatch operator, posted about President Trump's election victory on Facebook. In responding to the comments to her post, Bennett used a racial slur. The employer ultimately discharged Bennett for using the racial slur, and the Sixth Circuit upheld the termination.

In its decision, the Sixth Circuit noted that sufficient disruption was shown to tip the balancing test in the employer's favor. The court reasoned that even though Bennett's post may not impede the performance of her duties, it likely disrupted the harmony of the workplace, was likely to have a detrimental impact on close working relationships, and detracted from the mission of her employer. The fact that Bennett's Facebook profile was public and identified her as an employee of the entity also weighed in the employer's favor. Finally, the court recognized that the use of a slur enjoys less protection than other types of speech, so less of a showing of disruption is required.

Student Speech

According to the U.S. Supreme Court's *Tinker* standard, students "do not shed their constitutional rights to freedom of speech or expression at the schoolhouse gate." Under this standard, schools may forbid or discipline speech that causes, or that school officials can reasonably forecast will cause, a "substantial disruption of or material interference with school activities." Relevant signs of disruption may

include increased absences, complaints from multiple students, fights or verbal altercations between students, or a drop in classroom participation or performance.

Beyond *Tinker*, the type of speech is key to determining the extent to which school officials can respond, including:

- True threats require the speaker's conscious disregard of substantial and unjustifiable risk that the speech will cause harm. See our February 2026 School Law Notes article, *Disciplining Students for Making Threats*.
- School sponsored speech is that which the public might reasonably view as endorsed by the school. Schools may restrict it if the restrictions are "reasonably related to legitimate pedagogical concerns."
- Vulgar speech may be prohibited by schools even without any substantial disruption.

The prohibition on vulgar speech applies even when it expresses a political viewpoint. The case *BA v Tri Co Area Schs,* 156 F4th 782 (CA 6, 2025) concerned two students directed by school officials to remove sweatshirts bearing the slogan "Let's Go Brandon,." Critics of President Biden used the slogan to express the message "F*** Joe Biden." Neither student was disciplined. The Sixth Circuit held that the interpretation of the slogan as vulgar was reasonable despite the absence of explicit profanity. The U.S. Supreme Court recently declined to review that Sixth Circuit decision, so this decision remains binding.

Notably, school officials should address student speech posted online or made outside of school hours, differently. The Supreme Court has ruled that schools have a "heavy burden to justify intervention" with political or religious speech that occurs outside school or a school program or activity, especially if it is political or religious.

Ultimately, there is a delicate balance between personal political expression and a school's authority over both its employees and students. Consequently, we encourage school officials to consult legal counsel before disciplining students or staff for speech that may be considered political.

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Sample Administrator Salary Schedule

To assist schools, a sample salary schedule for certain administrative positions is provided below. The sample schedule may also be adapted for other positions not covered by an existing collective bargaining agreement. Districts may add, remove, or rename positions and fiscal years to fit local practice.

School officials who have questions about creating, revising, or implementing salary schedules should contact a Thrun Labor attorney for district-specific guidance.

Administrator Salary Schedule

Position	***Fiscal Year Ending 2027***	***Fiscal Year Ending 2028***	***Fiscal Year Ending 2029***
Superintendent	**Base Salary: $**	**Base Salary: $**	**Base Salary: $**
High School Principal	**Base Salary: $**	**Base Salary: $**	**Base Salary: $**
Middle School Principal	**Base Salary: $**	**Base Salary: $**	**Base Salary: $**
Elementary Principal	**Base Salary: $**	**Base Salary: $**	**Base Salary: $**

Board Approval

Date established and approved by Board of Education: _____

Date(s) revised by Board of Education: _____

THRUN LAW FIRM, P.C.

Schedule of Upcoming Speaking Engagements

Thrun Law Firm attorneys are scheduled to speak on the legal topics listed below.
For additional information, please contact the sponsoring organization.
www.thrunlaw.com/calendar/list

Date	Organization	Attorney(s)	Topic
November 4, 2026	Thrun Law Firm, P.C.	Thrun Attorneys	Thrun Special Education Law Bootcamp Webinar Series – Maneuvering Through the Maze of Special Education Discipline
November 6, 2026	MAISA Fall Meeting	Ian F. Koffler	Capital Projects from an ISD Perspective
November 12, 2026	MASSP	Kelly S. Bowman	Dealing with Court Orders
November 18, 2026	Thrun Law Firm, P.C.	Thrun Attorneys	Thrun Labor Webinar Series – CBA Summary: Grievances & Collective Bargaining
November 19, 2026	Thrun Law Firm, P.C.	Michele R. Eaddy Cristina T. Patzelt	Title IX Comprehensive Training Webinar
November 19, 2026	Muskegon ISD	MaryJo D. Banasik	Navigating Employee Leave
December 3, 2026	MASPA Winter Conference	Raymond M. Davis	Contract Language: The Good, The Bad, & The Ugly Around the State of Michigan
December 3, 2026	MASPA Winter Conference	Katherine Broaddus	Managing ESTA: Year Two
December 3, 2026	MASPA Winter Conference	Robert A. Dietzel	Legal Update
December 10 & 11, 2026	Thrun Law Firm, P.C.	Thrun Attorneys	Policy Implementation Webinars
January 5, 2027	Genessee ISD	MaryJo D. Banasik	Employee Leave/ADA/Pregnancy Workers Fairness Act
February 17, 2027	MSBO	MaryJo D. Banasik	Collective Bargaining Agreements and Contracts Webinar

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