

## 2019-20 Legal Update for Scribner-Snyder Staff



**Karen Haase**

 **KSB School Law**

 **@KarenHaase**



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## Agenda

- A Quick Update on Vaping/Juuling
- Special Education Issues for General Education Staff
- Social Media Issues
  - Regarding Students
  - Regarding Staf

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### Juuling

- What is a Juul?
  - Brand-name of a e-cig that looks like a USB flash drive
  - Charges in a USB port
  - Small enough to be concealed in a closed fist, backpack, sock, or undergarment
  - Hard to detect for teachers that do not know what they are looking for!

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### Juuling

- Hard to detect because the vapor a Juul emits does not smell like cigarette smoke
- Students can blow vapor into a backpack or sweater and teacher is none the wiser
- One pack of oil for a Juul contains the nicotine equivalent to 1-pack of cigarettes

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## Juuling

- Law enforcement and DREs report Juuls are used to inhale controlled substances
- Juul controls 72% of e-cig market
- FDA has stepped in to determine whether Juul is deliberately targeting minors as consumers
- FDA commission says Juuling has reached "epidemic proportions" in high schools and middle schools

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## LB 149

- Added "nicotine delivery systems"
  - any product or device containing nicotine, tobacco, or tobacco derivatives that employs a heating element, power source, electronic circuit, or other electronic, chemical, or mechanical means, regardless of shape or size, to simulate smoking by delivering the nicotine, tobacco, or tobacco derivatives in vapor, fog, mist, gas, or aerosol form to a person inhaling from the product or device.
- Increased age to 19

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## How About a Little Special Ed?

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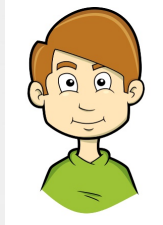
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### Meet Roscoe

- 3<sup>rd</sup> grade
- Very smart – parents say he has never been challenged by school's teachers
- Easily bored
- Bothers peers when they are working
- Gets very upset when he thinks he's in trouble
  - Cries
  - Yells
  - Tears papers up
  - Crawls under desk and curls up




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### Child Find

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### Child Find in IDEA Part B

- Affirmative, ongoing obligation of states and local school districts to identify, locate and evaluate all children with disabilities. . .
- Specifically references:
  - homeless
  - are wards of the State
  - attending private schools
  - Migrant and mobile students
  - regardless of the severity of disability
- Even if they are advancing in grade

34 C.F.R. 300.111

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**Independent Sch. Dist. No. 283.,**  
74 IDELR 19 (D. Minn. 2019)

- Student starts missing school in 8<sup>th</sup> grade
  - Missed 18 days first semester, March stops attending
  - Hospitalized; diagnosed with anxiety disorder & depression NOS
  - SITT does not refer because grades excellent
- 9<sup>th</sup> grade – attendance irregular
  - readmitted to hospital two different times
  - School disenrolls
  - Tells school if she is referred to special ed, she can't take honors courses

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**Independent Sch. Dist. No. 283.,**  
74 IDELR 19 (D. Minn. 2019)

- 10<sup>th</sup> grade
  - School creates 504 plan (without eval)
  - Disenrolled each semester because missed >15 days
  - Disenrolled
- 11<sup>th</sup> grade – family requests eval in June
  - Student verifies, placed in alternative program
  - Attends two days and never returns
- Family files DP alleging child find violation

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**Independent Sch. Dist. No. 283.,**  
74 IDELR 19 (D. Minn. 2019)

- ALJ finds for family; school appeals
- Court:
  - "Although Student's absenteeism was the primary barrier to conducting systematic observations, it has also been one of the most visible symptoms of the Student's disability."
  - "No one disputes that the Student excelled on standardized tests; neither can anyone dispute that her absenteeism inhibited her progress in the general curriculum."

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**IEP Meetings**

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**In re Dekalb County Sch. Dist.,**  
 119 LRP 28554 (Ga. SEA 2019)

▪At meeting:

- Mom raises residential placement; staff say "people who would make that decision are not here; that is not the purpose of the meeting."
- Mom suggests adaptive living goals; classroom teacher says "unrealistic" and won't discuss
- Teacher inaccurately reports student has mastered goals in his current IEP

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**In re Dekalb County Sch. Dist.,**  
 119 LRP 28554 (Ga. SEA 2019)

▪ALJ:

- By not having necessary staff present who could approve residential placement, school predetermined
- Team's exclusive consideration of teacher's goals and dismissal of mom's goals was also predetermination
- "By failing to honestly report [student]'s lack of progress, mother was denied the opportunity to meaningful participation in the IEP meeting
- Ordered reimbursement for residential placement

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**Teachers Leaving IEP Meetings Early**

- Parents must be notified IN WRITING IN ADVANCE
- Parents must consent IN WRITING
- Parents can withdraw consent AT ANY TIME

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**Lucia Mar Unified School District, 119 LRP 25481 (Cal. SEA 2019)**

- Marathon IEP (3 meetings, 3-4 hours each)
- When scheduled second meeting, school told mom some staff couldn't be there
- SEA: "Although Parent stated she would excuse the general education dance teacher, Parent never consented in writing to the teacher's absence in future meetings."

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**Implementation of IEP**

- ALL staff must implement IEP EXACTLY as written
- If the IEP is stupid?
  - STILL IMPLEMENT

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**Long Beach Unif. Sch. Dist.,  
119 LRP 12839 (Cal. SEA 2019)**

- Student's IEP said she was allowed to "undertake test corrections.
- Calculus teacher
  - only allowed Student to undertake full retakes of tests; i.e. taking a new, similar test in full, not just the questions similar to those previously answered incorrectly.
  - Also did not return work in a timely fashion

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**Troy Sch. Dist. v. K.M.,  
65 IDELR 91 (E.D. Mich. 2015)**

- 13 year-old with Asperger, ADHD and ODD
  - Became violent without warning
  - Disrupted gen ed environment on several occasions
  - Homebound to finish 6<sup>th</sup> grade; settlement agreement to start 7<sup>th</sup> grade
  - 4<sup>th</sup> day of school major assault with a "log"
- School recommended placement into specialized school for autism

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**Troy Sch. Dist. v. K.M.,  
65 IDELR 91 (E.D. Mich. 2015)**

- Mom: if student had proper support, he could be in gen ed classroom
- Parents' experts
  - Extremely bright, wants to be successful
  - Could be educated in a general education environment if he "were in a safe and welcoming environment"
  - "presented as ... child who was scared"

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**Troy Sch. Dist. v. K.M,**  
65 IDELR 91 (E.D. Mich. 2015)

- ALJ
  - Numerous provisions in the BIP and IEP not implemented with fidelity
  - Because the district committed numerous procedural violations, "the court need not defer to the District's placement"
  - Court ordered school to provide a 1:1 psychologist with training in autism.

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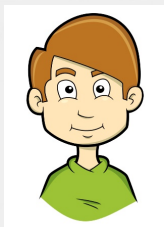
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**So, should we evaluate Roscoe?**



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**Least Restrictive Environment**

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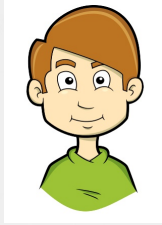
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### Roscoe's parents take him to a private therapist

- LMHP says Roscoe has social anxiety, ODD and ADHD
- Roscoe is verified and team is putting together IEP
- Parents want Roscoe placed in the resource room where a teacher can address his academic abilities and work intensively with him on behavior
- Teacher would love to have Roscoe out of her classroom




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### Least Restrictive Environment (LRE)

- Special education students must be placed in the least restrictive environment.
- Determined by IEP team.
- Restrictions are permitted to meet:
  - Disabled child's needs.
  - Needs of child's peers.\*
- No entitlement to regular school day or week.
- Restrictive placement is not discipline.

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### The LRE Continuum

- Schools are required to begin with a presumption that a student will be in the regular classroom in his neighborhood school. 34 CFR § 300.115 (a).
- Team can then move a student along a range of increasingly restrictive placements until they discover the one that is appropriate for the child.
- Should include instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions. 34 CFR 300. § 115 (a); and 34 CFR § 300.39.

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**The LRE Continuum**

- When determining the appropriateness of inclusion, public agencies should consider both academic and nonacademic benefits. *Sacramento City Unified Sch. Dist., Bd. of Educ. v. Rachel H. by Holland*, 20 IDELR 812 (9th Cir. 1994), *cert. denied*, 109 LRP 34833, 512 U.S. 1207 (1994).

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**The LRE Continuum**

Least Restrictive

Most Restrictive

- Regular education with weekly monitoring from a special education teacher
- Regular education with daily consultation from a special education teacher
- Regular education with special education services and supports which are aligned with the general curriculum
- Regular education with special education services provided for part of the day in a resource room or a special education classroom
- Self-contained special education classroom
- Special day school (outside the school campus)
- Residential treatment facility
- Hospital
- Detention facility
- Homebound

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**First Consideration Given to Regular Classroom**

First consideration must be given to placement in a regular classroom with any necessary supplemental aids and services to make that placement successful before considering more restrictive placement options.

*Letter to Cohen*, 25 IDELR 516 (OSEP 1996)

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**Troy Sch. Dist. v. K.M.,  
65 IDELR 91 (E.D. Mich. 2015)**

- 13-year-old boy with Asperger syndrome/ADHD/ODD
- Violent and disruptive behaviors in general ducation class.
- School proposed placing him in a center-based program for kids with emotional disturbances
- Mom: if student had proper support, he could be in gen ed classroom
- Court ordered school to provide a 1:1 psychologist with training in autism.

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**Hannah L. v. Downingtown Sch.,  
63 IDELR 254 (E.D. Pa. 2014), aff'd, 65 IDELR 223  
(3d Cir. 2015)**

- Student with SLD. IEP team rejected the regular education classroom as her placement.
- Only explanation given was "this would not meet the student's needs for specially designed instruction at this time."
- IEP team failed to document the specific reasons underlying its decision, such as the types of supplementary aids and services that it considered and rejected, as well as an explanation of why they would not allow the student to make progress in the general education classroom.
- "The district provided only lip-service to the IDEA's mainstreaming requirement."

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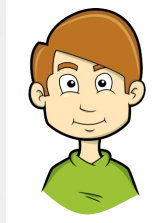
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**So, can we move Roscoe to the  
Resource Room?**




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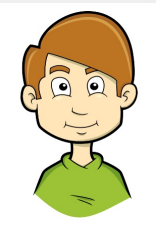
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### Roscoe is placed back in the 3<sup>rd</sup> Grade Classroom

- He becomes increasingly disruptive
  - Yelling
  - Refusing work
  - Pushing over desk
- When he is disruptive, teacher sends him to the office where Roscoe completes his work
- Speech path and school psych both do Roscoe's pull-out social skills work regardless of whether he is in classroom or office




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### 34 CFR § 300.530(b)

"School personnel ... may remove a child with a disability who violates a code of student conduct from his or her current placement ... for not more than 10 consecutive school days ... "

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### Removal from Current Educational Placement

- What is current educational placement?
  - Includes out-of-school suspension.\*
  - Could include in-school suspension (ISS).
  - Could include removal from classroom activities such as field trips.
  - Determined on a case-by-case basis.
- *Farmington (MI) Pub. Sch. Dist.*, 110 LRP 57410 (OCR 01/29/10).
  - "Generally, whether an in-school suspension should be counted depends upon whether educational and special services were provided during the in-school suspension."

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### Know Which Days to Count

- Always count
  - Out of school suspensions
- Sometimes count
  - In-school suspensions
  - Bus Suspension
  - Portions of a school day
- Rarely count
  - After school detention
  - Lunch detention

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### Detention




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### Temecula Valley (CA) Unif. Sch., 10 ECLPR 47 (OCR 2012)

- 1st-grader with cognitive and psych disorders.
- Student subjected to three lunch detentions and one in-school detention.
- Complainant alleged change in placement.
- OCR: "A small number of lunch detentions and one in-school suspension do not constitute a significant change in placement that trigger a school's responsibility to first convene a 504 or IEP meeting."

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**Smackover (AR) Sch. Dist.,**  
113 LRP 24693 (OCR 03/01/13)

- 7th-grade student with ADHD and speech deficit.
- 16 days of ISS.
  - 2/1 – 3 days (yelling, kicking peer, running away).
  - 3/14 – 5 days (accumulated more than 30 detentions).
  - 3/28 – 2 days (talking after he was asked to stop).
  - 4/2 – 3 days (argued with and pushed another student).
  - 5/1 – 3 days (pulled down his pants in class and showed his boxer shorts).
- School: 16 days in 1 year; complainant: 16 days in 3 months.

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**Smackover (AR) Sch. Dist.,**  
113 LRP 24693 (OCR 03/01/13)

- The ISS program:
  - Portable classroom separated from the school building, where students worked at individual cubicles.
  - Talking was not allowed.
  - Supervised by paraprofessional.
  - Students worked on assignments independently.
  - If a student had an academic question, para would email teacher.
  - If teachers believed that a lecture was critical, could ask for student to attend.
    - ... said no teacher ever.

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### Smackover (AR) Sch. Dist., 113 LRP 24693 (OCR 03/01/13)

- School: ISS not a change in placement.
  - Related aids and services were provided.
  - Attended speech therapy.
- OCR: "Confinement in ISS significantly altered his access to regular educational services provided in his IEP."
  - Denied access to instructions
  - Confined to an area where he simply completed work on his own.
  - Removed from the school building.
  - Placed in an isolated temporary classroom with students from all grades.

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### Even Stupid IEPs Must be Followed




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### Failure to Follow IEP can Result in Individual Liability



"And then I said, 'So sue me!'..."

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### MUST follow IEP

- IEP is staff's "safe harbor"
- District liable for failure to follow:
  - Due Process
  - OCR Complaint
  - Rule 51 Complaint
- Personal Liability
  - *Doe v. Withers*, (WV. 1993)
  - PPC claim

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### Other Interesting Stuff

- Parent claim that student took his own life because of stress caused by school's 504 implementation failures allowed to proceed.
  - *Whooley v. Tamalpais Union High Sch. Dist.*, 119 LRP 28552 (N.D. Cal. 2019)
- Private school that LEA contracted with cannot be sued for IDEA violations, but can be sued under §504 and IDEA
  - *P.G. v. Genesis Learning Centers*, 74 IDELR 223 (M.D. Tenn. 2019)

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### Have Smartphones Destroyed a Generation?

More comfortable online than out partying, post-Millennials are safer, physically, than adolescents have ever been. But they're on the brink of a mental-health crisis.




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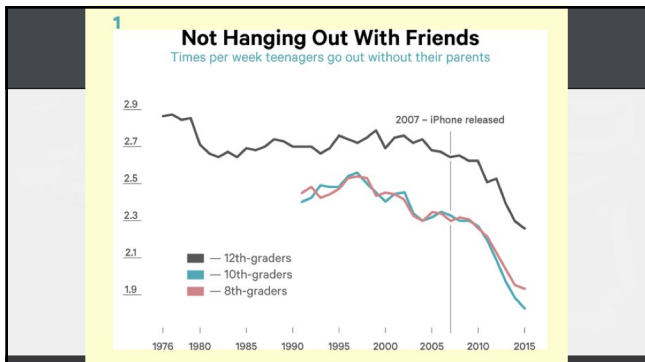
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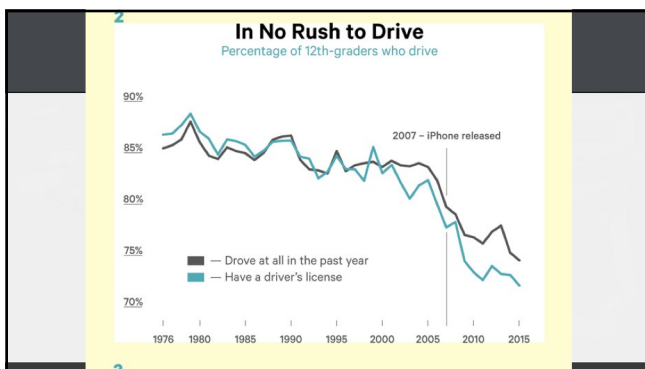
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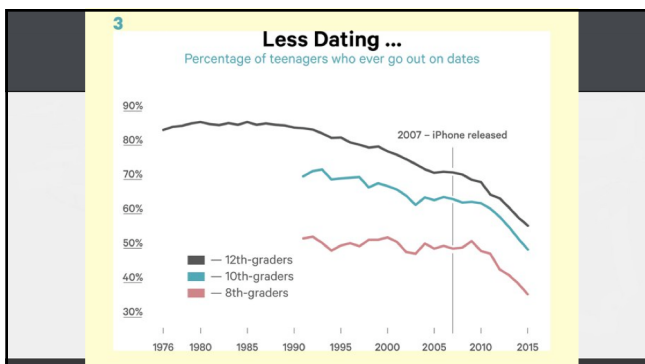
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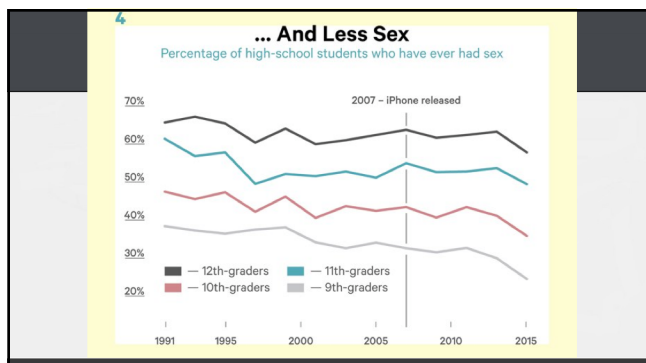
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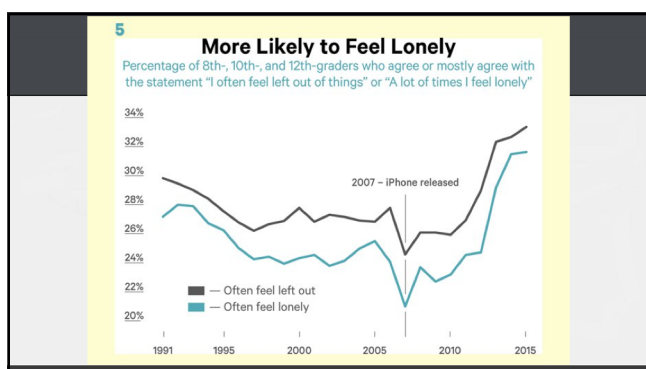
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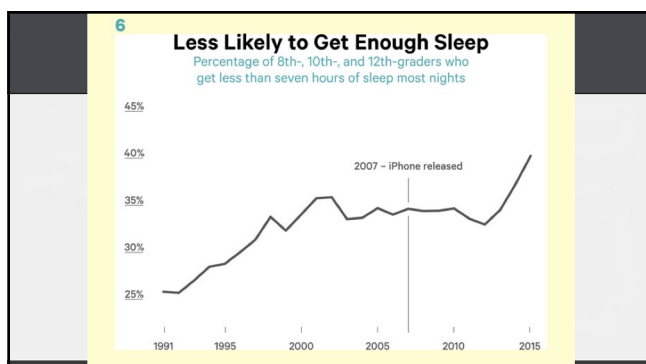
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**Legal Issues with Students' Social Media Usage**

- Harassing and bullying posts
- Sexting
- Ignoring basic internet safety

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**J.S. and Layshock (3rd Cir. 2011) (en banc)**

- Key legal points
  - School can't punish off-campus speech because it is vulgar, inappropriate or even criminal
  - School can only punish off-campus speech that is substantially disruptive

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**What About the Staff?**

- "We recognize that vulgar and offensive speech such as that employed in this case – even made in jest – could damage the careers of teachers and administrators and we conclude only that the punitive action taken by the school district violated the First Amendment free speech rights of J.S."
  - i.e. "We don't care."

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**Bell v. Itawamba County Sch.,**  
**799 F.3d 379 (5th Cir 2015) (en banc) cert. denied**

- Student made offensive rap recording
  - "Betta watch your back/Ima serve this n\*\*\*a like I serve the junkies with some crack"
  - "Run up on T-Bizzle/ I'm going to hit you with my ruger"
  - "You f\*\*\*ing with the wrong one/going to get a pistol down your mouth"
  - "Middle fingers up if you want to cap that n\*\*\*a"
- Posted to Facebook, YouTube
  - 2,000 hits

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**Bell v. Itawamba County Sch.,**  
**799 F.3d 379 (5th Cir 2015) (en banc) cert. denied**

- Principal heard recording (on a student's phone)
- Student who made recording disciplined:
  - 7-day suspension
  - Assigned to the alternative school for the quarter
  - No school activities
- School's evidence of disruption
  - Students congregating in gym
  - Coaches uncomfortable with female students
  - Coach made team stay until he left parking lot at night

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**Bell v. Itawamba County Sch.,**  
**799 F.3d 379 (5th Cir 2015) (en banc) cert. denied**

- Court
  - Social media access via phones means all comments about school have potential to affect school
  - "It . . . goes without saying that threatening, harassing, and intimidating a teacher impedes, if not destroys the ability to teach ... Moreover it can even cause a teacher to leave that profession. In sum, it disrupts, if not destroys, the very mission for which schools exist - to educate."

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### 4<sup>th</sup> Amendment & Phones

- *Riley v. California (2014)*
  - When arrested, an individual has a diminished right to privacy. Law enforcement can pat down, and search personal items.
    - Bags
    - Address book
    - Wallets and purses
  - Supreme court rules that phone searches incident to arrest are unlawful
    - Saying because you can search a wallet you can search a smartphone is like saying a ride on horseback is the same as a ride to the moon.

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### 4<sup>th</sup> Amendment & Phones

- *Riley v. California (2014)*
  - “Modern cell phones are not just another technological convenience. With all they contain and all they may reveal, they hold for many Americans the privacies of life. The fact that technology now allows an individual to carry such information in his hand does not make the information any less worthy of the protection for which the Founders fought.”

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### 4<sup>th</sup> Amendment & Phones

- *Gallimore v. Henrico County Sch. Bd. (2014)*
  - Parents report a long-haired kid smoking weed on a school bus
  - Principal calls in long-haired kid that was on the bus and searches him
    - Pat down, backpack, Ziploc bags, Vaseline jar
    - ...and his phone

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**4<sup>th</sup> Amendment & Phones**

- *Gallimore v. Henrico County Sch. Bd. (2014)*
  - Search of the student, his bag, the Vaseline jar—all reasonable at their inception based on the report
  - Search of the phone is not reasonable. Principal was searching for drugs.
  - Also: federal civil rights claim for failure to train. Failed in this case.

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**4<sup>th</sup> Amendment & Phones**

- *DeCossas v. St. Tammany Parish (2017)*
  - Student tells principal that Decossas is selling prescription drugs on school grounds
  - Decossas is called in, principal searches his person, his bag, and confiscate his phone
  - Principal demands Decossas unlock the phone, which Decossas does
  - Principal prints a series of text messages

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**4<sup>th</sup> Amendment & Phones**

- *DeCossas v. St. Tammany Parish (2017)*
  - The court: search was reasonable in it's inception.
    - Report of drug possession and drug dealing on campus
  - Search was reasonable in it's scope
    - Evidence of drug dealing is what the school was after, that involves communications, which would be on the phone
- Circuits vary

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**Students and Sexting**

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**Sexting: the Problem**

- A 2018 study published in JAMA Pediatrics, summarized 39 studies with a total of about 10,300 students under age 18.
  - 15% of teens say they send sexts
  - 27% receive them
  - 1 in 8 have forwarded a sext

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**State Obscenity Law– old  
(NEB. REV. STAT. 28-807 to 28-829)**

- NEB. REV. STAT. 28-813.01
  - Makes sexting (images) a class IV felony for offenders under 19
  - Class IIIA felony for 19 and up
  - Minors offense punishable by:
    - Up to 2 years in prison and/or
    - \$10,000 fine
    - Require sex offender registration

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**State Obscenity Charges – new  
(NEB. REV. STAT. 28-807 to 28-829)**

- NEB. REV. STAT. 28-813.01
  - (1) It shall be unlawful for a person nineteen years of age or older to knowingly possess any visual depiction of sexually explicit conduct which has a child as one of its participants or portrayed observers. Violation of this subsection is a Class IIA felony.

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**State Obscenity Charges – new  
(NEB. REV. STAT. 28-807 to 28-829)**

- NEB. REV. STAT. 28-813.01
  - (2) It shall be unlawful for a person **under nineteen years of age** to knowingly and intentionally possess any visual depiction of sexually explicit conduct which has a child other than the defendant as one of its participants or portrayed observers. Violation of this subsection is a Class I misdemeanor. A second or subsequent conviction under this subsection is a Class IV felony.

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**New Obscenity Affirmative Defenses  
(NEB. REV. STAT. 28-813.01(3))**

- First affirmative defense:
  - Defendant was less than **nineteen** years of age;
  - Child in the picture is at least **fifteen** years of age
  - Picture is knowingly and voluntarily generated
  - Picture is knowingly and voluntarily provided
  - Only one child in picture
  - Defendant hasn't shared the picture
  - Defendant did not coerce the taking or sending of the picture

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**New Obscenity Affirmative Defenses  
(NEB. REV. STAT. 28-813.01(3))**

- Second affirmative defense:
  - Defendant was less than **eighteen** years of age;
  - **Difference in age** between the defendant and the child portrayed is **less than four years**
  - Picture knowingly and voluntarily generated
  - Picture knowingly and voluntarily provided
  - Only one child in picture
  - Defendant hasn't shared the picture
  - Defendant did not coerce the taking or sending of the picture

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**Child Pornography Prevention Act  
NEB. REV. STAT. 28-1463.01 to 28-1463.06**

- (1) It shall be unlawful for a person to knowingly **make, publish, direct, create**, provide, or in any manner generate any visual depiction of sexually explicit conduct which has a child as one of its participants or portrayed observers.
- (2) It shall be unlawful for a person knowingly to purchase, rent, sell, deliver, **distribute**, display for sale, advertise, trade, or provide to any person any visual depiction of sexually explicit conduct which has a child as one of its participants or portrayed observers.

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**Neb. Rev. Stat. 28-707 (Child Abuse)**

- A person commits child abuse if he or she knowingly, intentionally, or negligently **causes or permits a minor child** to be...
  - "Placed in a situation to be **sexually exploited by allowing [or] encouraging such minor child to ... engage in ... obscene or pornographic photography, films, or depictions**"

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**So, two 16-year-olds exchange nudes**

- They both could be charged under 28-813.01
  - but they both will have an affirmative defense
- They both could be charged under 28-1463.03,
  - But they both will have an affirmative defense
- They BOTH can be charged and convicted under 28-707 for abusing one another.

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**So, two 16-year-olds exchange nudes**

- Does the school have to call the cops? Yes
  - Child abuse = mandatory report
  - Principal may also have independent reporting obligation under 79-293

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**Sexting Among Middle and High School Students:**



**59%**

knowledge of legal consequences "would have" deterred them from sexting.

According to 2014 Northeastern University Youth Sexting Study

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## Questions?



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## Have a good rest of the year 😊



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