

Bond Case Briefs

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Lightfoot v. Henry County School Dist.

United States Court of Appeals, Eleventh Circuit - November 10, 2014 - F.3d - 2014 WL 5803575

Public school teacher brought action against public school district and school board, alleging violations of the Family and Medical Leave Act (FMLA) and the Americans with Disabilities Act (ADA). The District Court granted summary judgment in favor of school district. Teacher appealed.

The Court of Appeals held that:

- School district and school board were not “arms of the state” of Georgia, and thus, were not entitled to Eleventh Amendment immunity, and
- Teacher could not establish ADA retaliation claim.

Public school district and school board were not “arms of the state” of Georgia, and thus, were not entitled to Eleventh Amendment immunity from liability, in terminated school employee’s Family and Medical Leave Act (FMLA) and Americans with Disabilities Act (ADA) claims. Although the state set minimum standards for schools and teachers, and the state provided funding to school districts and approved school district budgets, Georgia law viewed school districts and boards as political subdivisions, distinct from the state, Georgia granted school districts significant amount of autonomy, under Georgia law, school districts were subject to control and management of county boards of education, not the state, school district could levy property taxes to raise funds, and state had no obligation to pay any judgment against district or board.