

FREEDOM FROM RELIGION *foundation*

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July 8, 2026

**SENT VIA EMAIL & U.S. MAIL: farner@arrowheadschoools.org,
schoolboard@arrowheadschoools.org**

Conrad D. Farner
Superintendent
Arrowhead Union High School District
800 North Avenue
Hartland, WI 53029

Re: Support for District's Constitutionally Sound Graduation Policy

Dear Superintendent Farner and School Board members:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) to express our support for the Arrowhead Union High School District's decision to maintain religious neutrality during its recent graduation ceremony by declining to include religious or political messages in the district-sponsored graduation slideshow. FFRF is a national nonprofit organization with more than 41,000 members across the country, including more than 1,800 members and its national headquarters in Wisconsin.

We recognize that the district has come under criticism for declining a graduate's request to include a bible verse and later a message thanking God in the district's graduation slideshow. Based on your public statements, however, the district's decision reflects a sound understanding of the First Amendment and longstanding Supreme Court precedent.

As you correctly explained, the graduation slideshow constituted school-sponsored speech, not a public forum for unrestricted student expression. It is our understanding that the district established neutral parameters in advance, limiting student submissions to family acknowledgments and post-graduation educational or career plans. Those content limitations applied equally to religious and political messages and were reasonably related to the slideshow's educational purpose.

The Supreme Court has long recognized that public schools retain editorial authority over school-sponsored expressive activities. In *Hazelwood School District v. Kuhlmeier*, the Court held that educators may exercise editorial control over school-sponsored student expression when their actions are reasonably related to legitimate pedagogical concerns. 484 U.S. 260 (1988). Likewise, in *Santa Fe Independent School District v. Doe*, the Court reaffirmed that student speech remains school-sponsored where school officials have not opened the platform for indiscriminate student expression. 530 U.S. 290, 302–03 (2000). Your decision to ensure that an official graduation presentation remained focused on its intended purpose while avoiding the

appearance of school promotion of religious or political viewpoints falls squarely within this well-established authority.

Contrary to claims being advanced by the Wisconsin Institute for Law and Liberty, the First Amendment does not require public schools to include religious messages in school-sponsored programs simply because students would like to express them. Had the district opened the slideshow to unrestricted personal viewpoints, different constitutional considerations might arise. But that is not what occurred here. Instead, the district created a limited, school-controlled presentation with clearly defined subject matter and applied those limitations consistently.

Opening an official graduation presentation to religious and political advocacy would create significant constitutional concerns and practical problems. Public schools may not selectively permit Christian messages while excluding other religious, anti-religious or political viewpoints. If the slideshow became a forum for personal advocacy, the district could be compelled to accommodate messages representing virtually any religious or ideological perspective.

Public schools serve students and families representing a broad diversity of religious beliefs and nonbelief. Maintaining governmental neutrality toward religion ensures that every graduate is equally welcomed and respected, regardless of their faith or lack thereof.

Students remain entirely free to express their religious beliefs in their personal capacities before, during and after graduation, so long as they are not speaking on behalf of the school. The Constitution, however, does not require public school districts to transform official graduation programming into a public forum for religious expression. To the contrary, maintaining religious neutrality in school-sponsored events is precisely what the First Amendment requires.

Thank you for your commitment to upholding the constitutional rights of all students and for your careful stewardship of the district's legal obligations. Please do not hesitate to contact FFRF if we can be of any assistance.

Sincerely,

A handwritten signature in blue ink, reading "Chris Line". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Christopher Line
Legal Counsel
Freedom From Religion Foundation