

## *A Consideration of Students' Rights, the Law and Implications for a New Education Paradigm*

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*Censorship of school library collections has risen significantly in the last few decades, and such attacks are increasing. American courts have ruled that students in schools have First Amendment rights and some degree of freedom of speech. Courts also have ruled that students have the right to information and to learn and discuss issues of importance within the context of their schools and libraries. This study sought to determine the knowledge levels of a sample of school librarians concerning what they know about and how they support important court rulings that affect students' First Amendment rights. The study also sought to determine the role of librarians as advocates for those rights.*

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## Purpose of the Study

This study has two m



1. the students' rights regarding freedom of belief;
2. the rationale for the government's desire to indoctrinate students; and
3. the role of the judiciary in protecting First Amendment rights within the context of public education.

In an earlier ruling, the Supreme Court had recognized and protected students' rights to free speech and had insisted that schools remain a marketplace of ideas rather than an institution to foster a homogenous nation. The Court also had insisted that public school official cannot impose a "pall of orthodoxy" on the classroom (Van Geel 1983).

On the other hand, both the Supreme Court and lower court rulings had likewise recognized the legitimate function of public schools to properly inculcate students. Such indications from the courts give support to those who wish to have the rights of school authorities enforced and protected in overseeing policies and procedures, such as the selection of materials for classrooms and libraries (Van Geel 1983).

First Amendment rights and challenges to government officials' decisions to remove materials from a school library could not be easily approached by the Court in *Pico* using the traditional means of resolving First Amendment conflicts. The central test presented to the Court was whether an order by a governing board to remove books is based on reasonableness and legitimate pedagogical concerns. The *Pico* decision also underscored the Court's view that students not only have a right to receive information, but also to learn and to be taught.

Although the Court was clear to say that this ruling concerned only the removal of books from a school library by a board, it did present other constitutional issues. The role of government in restraining free speech of individuals is not clear or obvious when government refuses to purchase a book for a library. As mentioned earlier, with *Pico* and other rulings, the Court indicated that governmental boards may not prescribe orthodoxies to be adhered to within a school by the withdrawal of unacceptable books from a school library. The removal of books from libraries may be challenged on this, as well on grounds that such removal is a violation of the right to receive information. The selection and acquisition of materials also might be challenged if it is clear that the refusal to purchase certain items is a clear and persistent practice that in effect prevents certain ideas from being made available to students. Courts have recognized that a school cannot buy all books or materials relating to a topic or idea, and that officials must make decisions about what will be acquired, but *Pico* implied that constitutional rights have been violated if it can be shown that a persistent pattern of refusal to purchase certain types of materials is present. Records of selection decisions and official selection policies can possibly be used by courts in deciding whether unconstitutional practices have been systematically practiced (Van Geel 1983).

In line with rulings in *Pico*, Van Geel (1983) argued that to test whether government has impinged upon First Amendment rights of free speech, courts must consider the motives of boards when they refuse to allow the purchase of materials, and whether those motives present governmental restraint on the right of free speech for private individuals (Munic 1983). Courts also have implied that if a book has been removed from a library and as a result of this removal students cannot gain access to the book through other means, then in effect they have been denied access to this material and their constitutional rights may have been violated (Van Geel 1983).

*Pico* is now a legal standard set by the Supreme Court that lower courts follow in their determination of whether students' First Amendment rights regarding library collections have been violated, although for some years after the ruling, some observers felt that the educational justification for removal of books from libraries was so broad or "camouflaged" that the ruling would be of little help in the fight against school library censorship (Dorrell and Busch 2000). Nevertheless, the

occurring in public school libraries and with instructional materials, outlining some of the important legal questions that courts have had to deal. In the course of addressing academic freedom of library professionals, student's right to have access to library holdings, and the shelf-life of library materials, Cole (1985) identified significant problems presented by court cases involving censorship in secondary school libraries and discussed their resolutions by courts. Davenport-Binetsch (1983) presented case notes involving *Pico*. Donelson (1972) defended the rights of students to read as viewed by teachers of English. Dunn (1985) wrote about the implications of the *Pico* ruling and its effects on school library censorship. Prior to the *Pico* ruling, Harpaz (1981) discussed at length the constitutional dilemmas involving public school library censorship arguments and considered a paradigm for solution. Kaiser (2000) reviewed the impact of filtering on constitutional rights. Kamiat (1983) considered *Pico* in terms of its role in defining state indoctrination, the non-state voice in public education and the need to limit censorship of school library materials. Niccolai (1981), before the *Pico* ruling, wrote about the constitutional problems presented by school library censorship and its interference with free speech and the right to read. O'Neil (1981) considered the problem of school censorship from a broad context as it affected students, parents, teachers, administrators, librarians, and the general community. Writing just after *Pico*, Quenemoen (1983) outlined the implications of *Pico* and noted the its apparent limitations. Roy (2005) considered the influence of inculcation, bias, and viewpoint discrimination in public school education. Sanders (1999) wrote about legal issues involved with indecent material available to children through the Internet. Yudof (1984) analyzed general legal issues involved in the selection of library books in public schools.

## Review of Literature Related School Library Media Censorship

### School Library Media Censorship

The literature of school library media censorship is vast, diverse, complex in its issues and frames of references, and raises many social, cultural, and political questions. Alexander and Miselis (2006) considered the needs of gay, lesbian, bisexual, and transgender youth to have materials in school libraries addressing their issues and the inhibiting effects of censorship on those needs. Beck (1987) studied the constitutional rights of students as reflected by the Burger court. Borowiak (1983) addressed censorship of both textbooks and library materials in Illinois public high schools. Bracy (1982) investigated the influence of school library selection policies on censorship and how policies were used to defend items under challenge. Bringelson (2005) considered censorship issues in Canadian school libraries. Bump (1980) studied the influence of prior censorship of items on librarians' selection behaviors. Burns (2001) investigated school board member perception of students' First Amendment rights concerning the selection of library materials. Callison (1991) reviewed the research literature on school libraries, including censorship and made suggestions regarding a research agenda. Chandler (1985) studied administrators' perception of intellectual freedom of elementary school students and the use of trade books in the elementary school. Coley (2002) examined collections of school library media collections in Texas to determine the nature of their holdings in an attempt to determine the degree of self-censorship by librarians. He concluded that more self-censorship appeared to occur in smaller schools. His work also included a discussion of the literature on censorship in school libraries, including early studies and commentaries by Woods and Salvatore (1981) and Woodworth (1976).

Detty (1981) studied legal and court decisions affecting school libraries. Douma (1973) looked at book selection policies and their relationship to censorship in Michigan schools. Fiedler (1998) surveyed censorship experiences of North Carolina school library media specialists. Fiehn and Roman (2006) surveyed censorship actions in school library media programs in Illinois. Fisher (2004) reviewed Internet censorship in elementary school library media centers. Fiske's (1959) study of censorship in school and public libraries in California now adds historical perspective to the development of censorship. Harger (2006) discussed the conflict she experienced with her school principle concerning censorship. Harney (2002) noted in her study of school of library and information science students that students who were studying to be school library media specialists tended to favor censoring Web content more than other types of students. Henry (2000) provided a brief but revealing overview of censorship in American school libraries. Herumin (2004) considered censorship, the Internet, and filtering and its impact on freedom of speech. Hopkins (1983; 1989; 1990; 1991; 1993a; 1993b; 1995; 1996a; 1996b; 1998; 2003) explored censorship in practice as well as theory in her substantial set of writings from 1983



Tyler-Porter (1997) investigated administrators' attempts to censor both text and library materials in Georgia schools. Truett (1997) wrote about censorship and the Internet, placing her discussion in the context of the important laws, professional directives, the U.S. Constitution, the Bill of Rights, and the free flow of information in a democratic society. Van Meter (1991) described a national survey designed to determine the difficulty of finding controversial materials such as child abuse, homosexuality, and incest in school library media centers. Vrabel (1997) studied Texas school librarian's perception of censorship and intellectual freedom.

Zirkel and Gluckman (1997), addressing principals, considered important court rulings regarding censorship and reaffirmed that school administrators could not summarily suppress books of a

3. Do selected personal and demographic characteristics of librarians have any effect on librarians concerning their behavior and attitudes about censorship in their schools (personal characteristics; school characteristics, location of school, Texas Education Agency [TEA] standings, library collection characteristics, perception of administrators knowledge about censorship court rulings)?
4. What are their personal feelings about the necessity to inform administrators about *Pico*?
5. Do they expect support from administrators in censorship disputes?
6. How will they accept orders to remove item(s) from a collection?
7. How willingly are they to turn for help outside the school system when ordered to remove item(s) from a collection?

A secondary reason for this research, and one that is suggested by the vast amount of literature devoted to these issues and informed by the possible findings of this and other similar studies, is to consider a reformation of the paradigm of education for school library media specialists whereby more attention is given to the need to protect the rights of youth, to better understand constitutional law, and to view the school library media center in the context of its role as an open forum for debate in American society.

## Methods

### Development of the Questionnaire

A questionnaire was developed especially for this study to answer the research questions stated above (see appendix 1). The questionnaire was divided into three sections. Section I asked for demographic identification (for example, age and gender) and school and community environment. Section II gathered information about censorship challenges, including knowledge of court rulings affecting censorship and potential behaviors that librarians might take if and when confronted with censorship situations. Section III allowed for personal comments. The questionnaire was reviewed by several groups of librarians and graduate students in a class in school library administration. Based on comments, the questionnaire was revised.

Two reliability measurement scales were created for the present study. The first scale, called the judicial awareness questions, included questions 17 through 21. The Cronbach Coefficient alpha



reported that they had access to the Texas Library Collection (TLC)--a large state-supported school library consortium that, at the time of the study, supported a variety of library services, including interlibrary loan and the sharing of catalog records and information databases--and 149 (99 percent) offered access to the Internet. In terms of expenditures, a slight majority (N=76, 51 percent) reported a budget of from \$5,001 to \$15,000 per year. Forty-one (27 percent) had budgets of more than \$15,000).

### Perception of Community by Librarians

For the most part, librarians in the sample perceived the community in which their schools were located to be conservative (N=68, 46 percent) or moderate (N=43, 30 percent). Communities ranked as either extremely conservative (N=12, 8 percent) or liberal (N=17, 12 percent) were in the minority. Table 1 gives descriptive information about schools and library collections and perception of community by librarians. Table



Censorship Experiences

N=150	N	%
None at all	81	54
Some, but rare		

3	0	0
4	10	7
5	0	0

Knowledge of and Support of Pico

*Pico* is the only case involving school library collections to have reached the Supreme Court. For this reason, subjects were asked about their awareness of it and (based on a brief description of the Court’s ruling provided in the questionnaire) whether they agreed with the Court’s findings. Of 147 responses, eighty-two (55 percent) stated that they had never heard of it, while two (1.3 percent) indicated that they knew and understood it well. Librarians generally agreed with the Court’s ruling. Twenty-eight (19 percent) of 147 responses supported the ruling completely; sixty-one (42 percent) generally agreed with the concepts of the ruling; and forty-three (29.3 percent) stated that they were in agreement with its concepts. This is an agreement rate of 90.3 percent. (Note: The “generally agree” response indicates that all things being equal, they can support the ruling.) See table 4.

Table 4: Librarians Agreement with Island Trees v. Pico Ruling and Perception of Administrators Awareness of Pico

Librarians Agreement	(N=147)	N	%
I generally agree		61	42
I am in agreement		43	29
I support these [rulings]			





Strong support	18	12
No support	14	10
Complete support	6	4

Based on 148 responses, a majority (N=124, 84 percent) indicated they would accept an order to remove items from their collections if ordered to do so by their boards; however a large majority of these would accept the order with some level of reluctance (N=141, 95 percent). Only 7 (5 percent) indicated that they would accept a removal order without question. Twenty-four (16 percent) stated that they would challenge or dispute the order and present evidence of legal problems that might arise from the removal. Table 6 gives response categories.

supported by seventy-two (54 percent) subjects, while sixty-two (46 percent) did not support personal legal counsel. See table 7.

Table 7. Librarians Preferred Sources of Outside Help in Event of Censorship Challenge

Parents (N=150)	N	%
Probably not	71	47
Yes	37	25
No	15	10





Acting as government agencies, local schools boards in the United States fulfill legislative, executive, and judicial roles in their decision-making capacities (Burns 2001). Burns noted that community standards, expectations, and values regarding proper behavior and conduct in society and pressures placed on school boards to maintain certain standards and expectations are important in defining the role of censorship of school library materials.

The population of school librarians surveyed was drawn from a 71 percent stratified random sample of 407 schools located in an educational service center located in central Texas. The service area is comprised of sixteen counties and represents small and large schools as well rural and metropolitan population are4( )nd popul

associations do offer guidance through their philosophical stance and publication programs. On the other hand, librarians in the survey would not turn for help to ACLU, an organization that has a history of direct involvement at the local level in First Amendment disputes. By only a slight majority, participants would turn to private legal counsel. Vrabel (1997) also found that few librarians sought help from community or professional organizations when faced with censorship attempts.

## Support for Findings

### A Continuing Situation

As stated, this study was conducted in 2002. Since that time, several important investigations, reports, and court ruling reinforce these finding. Shupala (2006) discovered, similar to these findings, a lack of awareness of freedom of speech issues by both Texas school librarians and principals. In his analysis, he reported the need for a better understanding by Texas school librarians and principals of students' legal and First Smendment rights. He found a conflict between the understanding of school principles and school librarians regarding the role of censorship in Texas public schools. This finding is not reflected in the current study, where school librarians generally felt that their principals would support them in censorship demands. Shupala's work further revealed so great a difference in ideas about censorship held by school librarians and school principals that he felt both groups needed better education in legal issues surrounding censorship. Harger's (2006) personal story humanized this conflict as she recounted the debate she experienced with her building-level school principals regarding censorship and local community sensitivity.

The increasing importance of the legal issues involved in the legal aspect of school library media center censorship is again highlighted by Kravitz (2002) and her review of law and its implications for school library media specialists. Ongoing legal court cases involving censorship disputes such as those involving the Harry Potter novels also continue to support the findings and recommendations of this study ( *Counts v. Cedarville School District 2003*; *People for the American Way 2007*; *Greenhouse 2007*).

Although perceptions held about local communities by school librarians were found to be significant in this study, more investigation is needed to better understand this aspect of predictive behavior. This seems important, in that a better understanding of pressures faced by school librarians at the local level is crucial in understanding how they react to unconstitutional challenges to collections and protection of their own individual rights. Future research should to be directed at determining how librarians are integrated into their local communities; how they view their communities politically, socially, and culturally; how they internalize those values; and how those values influence behaviors regarding students' First Amendment rights and their willingness to protect their collections against censorship. Fiedler (1998) found in her North





of the library and the role that it as an institution has played in developing traditions and practices that support concepts of intellectual freedom (Reynolds 1999).

Previous studies have demonstrated that many reforms have taken place in the last few decades in how school library media specialists are educated. These reforms have emphasized the emerging role of the school library media specialists as education leaders, advocates for change, collaborators with teachers, and technological managers. Intellectual freedom appears to be subsumed within these categories (Callison and Tilley 2001; Shannon 2002, 2004; Tilley and Callison 2001). Chelton's remarks take on added meaning when compared with the broadening professional expertise of school librarians as indicated by these investigations. Evidence provided by Gover (1994), Samek (2001), and Thomson (2004) in support of intellectual freedom within the academy adds even more support to Chilton's concerns regarding the importance of academic freedom within professional education.

On the other hand, historical evidence shows that protection of collections from censorship has been a part of professional practice since the 1930s (Butler 1999). This suggests that intellectual freedom in various forms has always been a part of professional education. Modern-day curricula for librarians generally continue to include instruction on intellectual freedom issues, although apparently we have little consistently reported research evidence for this, as Shuman issued his study in 1977. Examples of current curricula include Indiana University, the University of Washington, and the University of British Columbia (Indiana University School of Library and Information Science 2007; University of Washington Information School 2007; Samak 2001).

legal knowledge of school librarians and their awareness of their constitutional obligations to protect students' access to information intellectual freedom rights.

Teaching the rules and application of law and school libraries' constitutional responsibilities will need to be based on a fundamental understanding of community sociology and the political elements in community structures that determine both the role of schools and the flow of information within school environments. The development of self-awareness and how it affects a person's understanding of their responsibilities to protect students' intellectual freedom rights is absolutely necessary within the instructional process.

## Curricula and Research

Research is a key to understanding these issues. Research is needed to determine the existing attention given to academic freedom in current, and even future, curricula, especially regarding the types and levels of instruction that school librarians receive in their professional training on judicial and legal matters pertaining to censorship and academic freedom rights. More research also is needed to help understand the levels of influence that such instruction might have on professional attitudes and behaviors regarding the obligations of school librarians to protect the academic freedom rights of students. In addition, research is needed to determine the types of and effectiveness of instructional methodologies, curricula, and instructional support materials needed to teach both the legalities of constitutional rights as well as the legal responsibilities of school librarians to defend freedom of access to information by youth.

From recent court decisions and social and cultural pressures, it is clear that school librarians, especially in the United States and Canada, will be called upon more and more to understand constitutional law and their obligations to defend freedom-of-speech issues within the school library environment. We already see evidence of this based on calls for more intense involvement in intellectual issues from the field. The importance of better legal training for school libraries is intensified by the emerging and broadening concept of the school and its library as a limited public forum. Defined by American courts, this means that a traditional space such a library or school is recognized by the government as appropriate for discussion, debate, and exchange of ideas, and the government cannot discriminate against viewpoints on subjects appropriate to the forum, although the government (such as school boards) can exclude categories of speech that justifiably do not fall within the designed purpose of the forum (ALA Intellectual Freedom Committee 1994; Minow and Lipinski 2003; Siple 2003).

Although the present study was limited to one geographic location, the instructional paradigm used to educate school librarians is somewhat standardized nationally through the use of textbooks, state and national standards, certification requirements, and a long history of federal government grant support to educate school librarians based on national educational policy (Lukenbill 1983). Theoretically, over the years this standardization should have produced a rather uniform student product, with a clear understanding of school librarians' obligations to protect students' constitutional rights. In light of the overall increase in censorship attacks on school library collec

## Conclusion

The review of the literature as well as findings from this study suggests complex and often perplexing issues that need further consideration. The literature clearly shows that social and cultural expectations and needs require today's students at all levels of education to be critical thinkers, that they understand history and broad social movements, that become comfortable using a variety of media, and that they have access to good teaching (Callison and Tilley 1998; Chadwick-Joshua 1992; Harada et al. 2004). Without access to information, democratic institutions and societies are at risk. Participants in this study appear to have a vague understanding of this, but only a small minority seem to relate this to their social and



Sex

- 1.  Male
- 2.  Female

Age:

I was born

- x  In 1980 or after
- x  Between 1959 and 1979
- x  Between 1938 and 1958
- x  Between 1917 and 1937
- x  In 1916 or before

Education

The highest level of my education is:

- 1.  High school or less
- 2.  Bachelor's degree
- 3.  Master's degree
- 4.  Doctor's degree
- 5.  Other

Certification

The highest level of library certification I hold is:

- 1.  Endorse level certification
- 2.  Learning resources level certification
- 3.  Emergency level certification
- 4.  I am currently studying for library certification

B. Please tell me about your school:

Please indicate the type of school you serve (indicate using the name locally applied to the school configuration)

- 1.  High school
- 2.  Junior high school
- 3.  Middle school
- 4.  Elementary school
- 5.  Combination (check this if you serve more than one school)
- 8.  Other

Size of school:

1. \_\_\_\_\_ Up to 200
2. \_\_\_\_\_ 201 to 500
3. \_\_\_\_\_ 501 to 1000
4. \_\_\_\_\_ 1001 and over

Location of school

1. \_\_\_\_\_ Mostly Rural
2. \_\_\_\_\_ Suburban
3. \_\_\_\_\_ Urban
4. \_\_\_\_\_ Inner city urban
5. \_\_\_\_\_ Other

TEA standing

For the last report period, my school district was ranked by TEA as:

1. \_\_\_\_\_ Exemplary
2. \_\_\_\_\_ Recognized
3. \_\_\_\_\_ Academically Acceptable
4. \_\_\_\_\_ Academically Unacceptable
5. \_\_\_\_\_ Special circumstances
6. \_\_\_\_\_ Other

For the last report period, my campus was ranked by TEA as:

1. \_\_\_\_\_ Exemplary
2. \_\_\_\_\_ Recognized
3. \_\_\_\_\_ Acceptable
4. \_\_\_\_\_ Low Performing
5. \_\_\_\_\_ Other

C. Please tell me about your library

Size of book collection

1. \_\_\_\_\_ Up to 1500 volumes
2. \_\_\_\_\_ 1501 to 10,000
3. \_\_\_\_\_ 10,001 to 20,000
4. \_\_\_\_\_ 20,001 and over

Diversity of collection (check as many as appropriate)

1. \_\_\_\_\_ Collection provides subscription at least 30 periodicals
2. \_\_\_\_\_ Collection includes at least 100 non-print items in various formats (e.g., videos, CDs, etc.)
3. \_\_\_\_\_ Collection includes access to the Internet

4. \_\_\_\_ Collection provides access to the resources of the Texas Library Connection
5. \_\_\_\_ Collection has other special features (please indicate): \_\_\_\_\_

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Spending for collection \_\_\_\_ . Please indicate the total amount of money spent last school year directly for the development of the collection. Do not include the school's subscription to the Texas Library Collection:

1. \_\_\_\_ \$1000 or less
2. \_\_\_\_ \$1001 to \$5000
3. \_\_\_\_ \$5001 to \$15,000
4. \_\_\_\_ \$15,000 and over

D. Please tell me about your perception of the community (select one only)

1. \_\_\_\_ Liberal (general supports liberal politics and issues)Tp8Td [(1.



- \_\_\_\_\_ 1. Never heard of it
- \_\_\_\_\_ 2. Have some awareness of it.
- \_\_\_\_\_ 3. Have a general concept of its importance
- \_\_\_\_\_ 4 . Have a good, solid understanding of it
- \_\_\_\_\_ 5. I know and understanding it well

2.3 Title of Case: *President Council, District 25 v. Community School Board No. 25* (457 F. 2d 289)

- \_\_\_\_\_ 1. Never heard of it
- \_\_\_\_\_ 2. Have some awareness of it.
- \_\_\_\_\_ 3. Have a general concept of its importance
- \_\_\_\_\_ 4. Have a good, solid understanding of it
- \_\_\_\_\_ 5. I know and understanding it well

2.4 Title of Case: *Right to Read Defense Committee of Chelsea (Massachusetts) v. School Committee of the City of Chelsea* (454 F.Supp.,703)

- \_\_\_\_\_ 1. Never heard of it
- \_\_\_\_\_ 2. Have some awareness of it.
- \_\_\_\_\_ 3. Have a general concept of its importance
- \_\_\_\_\_ 4 . Have a good, solid understanding of it
- \_\_\_\_\_ 5. I know and understanding it well

3. The *Island Trees v. Pico* case (457 U.S. 853) is the only school library censorship case to come out of the U.S. Supreme. Please rate the degree to which you are aware of this ruling.

- \_\_\_\_\_ 1. Never heard of it
- \_\_\_\_\_ 2. Have some awareness of it
- \_\_\_\_\_ 3. Have a general concept of its importance
- \_\_\_\_\_ 4 Have a good, solid understanding of it
- \_\_\_\_\_ 5. I know and understanding it well

4. Please review the following major concepts that came from *Island Trees v. Pico* ruling and respond to the following questions:

- x School boards cannot simply order the removal of books from school libraries because of the ideas, values, etc. expressed in them
- x School boards can remove books from school libraries based on based und(t)ooks7

- 4 . I am in agreement with these concepts
5. I support these concepts completely

5.1. Do you feel that the administration of your school district (principles and superintends) are aware of the Pico ruling and its implications for school library collections. (Check only one)

1. Administrators have no knowledge of this ruling
2. Administrators have limited awareness of this ruling
3. Administrators are generally aware of this ruling
- 4 . Administrators have a good understanding of this ruling
5. Administrators have a solid and well informed understanding of this ruling

6. Assume that you as a librarian would need at sometime in the future to inform your administrators about the Pico ruling. Rate how you feel your explanation to them of the Pico ruling might affect your professional credibility with your administrators. (Check only one)

1. I would feel threatened for my professional credibility
2. I would feel somewhat threatened for my professional credibility
3. I would not feel threatened for my professional credibility
- 4 . I would feel that my professional credibility would be respected
5. I would feel that my professional credibility would be enhanced

7. If you had a serious censorship challenge to materials in your collection, how supportive do you feel your school administration (e.g., administrators, school board) would be in helping you defend the disputed item(s)

1. They would not support the library staff's professional opinion to retain the item(s) in a challenge
2. They would give limited support to the library staff's professional opinion to retain the item(s) in a challenge
3. They would support the library staff's professional opinion to retain the item(s) in a challenge
4. They would strongly support the library staff's professional opinion to retain the item(s) in a challenge
5. They would completely support the library staff's professional opinion to retain the item(s) in a challenge

8. Assuming that a challenge to materials was upheld by your school's board and you were ordered to remove the material(s) and assuming that you felt the removal violated the concepts of *Island Trees v. Pico* and First Amendment protection (see question 4 ), indicate how likely you would be to respond: (Check only one)

8.1. Level of Acceptance

1. Accept the order
2. Accept the order with professional reservations
3. Accept the order but explain its possible legal consequences to those in authority



## Section II. Additional Comments

Please feel free to add comments relating to this survey:

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