

STUDENT PRIVACY AND CONFIDENTIALITY, BOOK CENSORSHIP, AND  
INTELLECTUAL FREEDOM IN THE SCHOOL LIBRARY

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## ABSTRACT

by

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This thesis investigated three challenges a school library faces related to intellectual freedom; interpreting student privacy and confidentiality laws, efforts to censor school library materials, and the lack of a systematic approach to advocating for the intellectual freedom rights of students.

The literature review reveals that the absence of a clear definition of “educational records” under FERPA, and gray areas in interpreting library records privacy laws, put librarians in a difficult position in the protection of minor students’ privacy and confidentiality rights. Developing judicial knowledge of federal court rulings regarding censorship in the school library can better prepare school librarians to defend students’ First Amendment rights to receive information. The role of the librarian is to create a culture of intellectual freedom in schools by instilling, promoting, and acting on the democratic values of society to protect basic human rights and freedoms.

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## CHAPTER 1 INTRODUCTION

Without Freedom of Thought,  
there can be no such Thing as Wisdom;  
and no such Thing as publick Liberty,  
without Freedom of Speech.—Benjamin Franklin

### **Statement of the Problem**

The purpose of the establishment of the first public library in the United States in 1731 by Benjamin Franklin was to provide the common man with access to information. Franklin understood that the more knowledgeable the citizenry, the more self-governed it is. Responsible self-government is the foundation of a democratic system. Democracy is based on the free flow of ideas. Each individual, including minor students, holds the rights to receive, use, and produce ideas of various perspectives. The preservation of these democratic values, free inquiry, the promotion of free flow of ideas, self-government, and respect for human rights are instilled and nurtured in the classroom and in the school library. Humans are natural information seekers concerning that which is

unknown or not well understood. By engaging in free inquiry, young learners construct meanings about the way the world functions around them and their own place in it.

The First Amendment to the Constitution guarantees freedom of expression and access to information for all. The school library, built on the democratic values of equitable access to information, as stated in the American Library Association's *Library Bill of Rights*, plays a vital role in the exploration of new ideas and construction of meaning, beliefs, and values. The school library, marked by its guarantee of free access to unlimited resources, becomes a gateway to the world that exists within and outside of the school. Students are dependent on school libraries to exercise their right to free and confidential exploration, experimentation, and inquiry in their quest to seek knowledge and understanding.

Although intellectual freedom is guaranteed to all by the *Universal Declaration of Human Rights*, it is often challenged or silenced. In the school library setting, intellectual freedom is threatened by gray areas in interpretations of the law that protects student privacy and confidentiality. Intellectual freedom is threatened by the efforts of certain groups or individuals to restrict access to materials for young people, with the intent to impose personal values and beliefs onto young readers or safeguard them from that, which is presumed inappropriate or harmful. Intellectual freedom is threatened by the lack of a systematic approach to advocating for the intellectual freedom rights of students in the school setting.

### **Purpose of The Study**

The purpose of this study is to provide a comprehensive, rather than an exhaustive view of the elements and challenges of intellectual freedom, as they interplay



in the school library setting. This research literature review examines the issues of protecting student privacy and confidentiality, book censorship, and promoting intellectual freedom in the school library, from three different perspectives. First, it demonstrates what school librarians do know and need to know about the law that protects minor students' privacy and confidentiality in the library. It explores how the Family Educational Rights and Privacy Act (FERPA) applies to student library records, offering suggestions for ways to protect students' privacy and confidentiality. Secondly, the body of research demonstrates the way in which book censorship has evolved over the years, how it plays out in school libraries, and what school librarians know about the effect court rulings have on students' First Amendment rights to receive information in the school library. Suggestions for ways to handle and minimize challenges to school library materials are offered. Thirdly, it explores strategies for advocating for the intellectual freedom rights of students, mentoring colleagues, teaching students to support intellectual freedom, and finally, creating a culture of intellectual freedom in the school library.

### **Research Questions**

To further understand the manifestation of intellectual freedom in the school library setting as it pertains to students, this work examines the nature of the law that protects minor students' privacy and confidentiality in the school library, while demonstrating the problem with its varied interpretations. Furthermore, an examination of the most common reasons for challenging school library materials, and ways in which school librarians can handle and minimize those challenges are offered. Lastly, the topic calls for examination of the particular role of the school librarian in creating and fostering

a culture of intellectual freedom in schools. Thus, this work aims to answer three main questions:

1. What is the nature of the law that protects minor students' privacy and confidentiality in the school library, and why are its varied interpretations problematic for school librarians?
2. What are the common reasons for challenging school library materials, and what are the ways in which school librarians can handle or minimize those challenges?
3. What is the role of the school librarian in creating and fostering a culture of intellectual freedom in schools?

Answering these questions calls for further and deeper investigation into the implications of the findings presented. Thus, the literature included in this work offers some suggestions. Ultimately, this work aims to assess the need for a paradigm shift in the manner in which school librarians protect students' privacy and confidentiality rights, librarians' knowledge of the constitutional law that protects students' First Amendment rights to receive information, and their ability to advocate for the intellectual freedom rights of students.

### **Limitations Of The Study**

#### **Time Constraints**

Researching the topic, finding relevant literature, and writing the literature review were subjected to deadlines. The literature review was to be written within the span of a few weeks. The introductory and conclusive chapters of this work had to be completed

within a few weeks, as well. Therefore, time constraints played a role in how thorough the research process was.

### **Article Selection**

Although presented from varied perspectives, there exists a plethora of research on censorship and intellectual freedom. This literature review presents a comprehensive rather than an exhaustive view of the topic at hand. The focus is on intellectual freedom in the school library setting. In this work, 23 resources were used. Other articles on the topic were not pursued.

### **Access**

Access to authoritative research literature was limited. The majority of the articles used in this literature review came from the James C. Kirkpatrick Library database at the University of Central Missouri, which grants its students free access to full text articles. There was an unsuccessful attempt to access full texts from various alternative databases.

### **Definition of Terms**

American Civil Liberties Union (ACLU): A nonprofit national organization dedicated to protecting the individual rights and liberties guaranteed to all by the Constitution.

American Library Association's Office for Intellectual Freedom: The office of intellectual freedom ensures implementation of ALA policies concerned with intellectual freedom as it is established in the *Library Bill of Rights*.

Association of American Publishers (AAP): A trade organization representing commercial, education, scholarly, independent, and other publishers, and advocating for the freedom to publish.

Banned books week: A campaign that celebrates the freedom to read and highlights banned and censored books

Challenged vs. Censored: A challenge is a written or verbal complaint about a book's content and/or intended age-appropriateness. Censorship is the actual removal of the book from a classroom or school library, limiting or restricting access to it.

Children's Internet Protection Act (CIPA): CIPA requires that all federally funded K-12 schools and libraries use Internet filters to protect children from harmful online content.

Consortium for School Networking (CoSN): CoSN is the district technology leaders' professional association. It offers tools and help with technology management, advocacy, and community building with the aim of creating engaging personalized learning environments.

Cooperative Children's Book Center (CCBC) at the University of Wisconsin-Madison's School of Education: the CCBC holds a collection of children's and young adult literature for the purposes of research and study. It also administers the statewide *Read On Wisconsin* literacy program.

Establishment Clause of the First Amendment: The clause disallows Congress to make a law that either promotes or prohibits the exercise of any given religion.

Family Educational Rights and Privacy Act (FERPA): A federal law that protects the privacy of student education records in schools that receive federal funds.

LibGuide: A Web 2.0 tool used to curate, manage, and publish multimedia content online. It can be used to promote library resources, create research portals, curate research, and more.

Library automation software: A software that allows for easy and quick access to and management of library resources.

National Coalition Against Censorship (NCAC): A national organization which works with community members to promote First Amendment rights to receive information and resolve censorship cases outside the courtroom.

National Council of Teachers of English (NCTE): A national organization dedicated to the development and improvement of English language acquisition and literacy skills.

Plurality decision: In the Court of Appeals, sometimes justices disagree on a decision and a majority opinion cannot be achieved. In those instances, two or more justices publish opinions, and other judges join the opinion they agree with most. The opinion joined by the highest number of justices is the plurality opinion and therefore, plurality decision.

Request for reconsideration: A form which is part of a school library's *Selection and Reconsideration Policy*, filled out by a complainant (i.e. a person who objects to a specific text or passage present in a school library). The complainant notes the passages in question, the reasoning for the complaint, and any other relevant information. The form is sent to a book committee (appointed by the school district board) for review and works its way up the hierarchy of the challenge process.

School library retention policy: A Policy that establishes how long student library records are kept and when they will be disposed of.

Secular humanism: A philosophy that bases its principles on reasoning, science, and social justice, and rejects religious dogma as a means to instill morality in human beings.

Wisconsin Educational Media and Technology Association (WEMTA): The organization supports educators in preparing students for an information-rich world. It fosters digital learning and information literacy skills through advocacy, professional development opportunities, and community partnerships.

Writers Hall of Fame: A nonprofit organization in Springfield, Missouri, which awards writing scholarships to more than 100 senior high school students who are pursuing writing and literary careers.

### **Research Design**

My initial interest was to research the topic of *intellectual freedom* as it pertains to school libraries. I accessed James C. KirkPatrick Library database at the University of Central Missouri. There, I used the search term *intellectual freedom*, which garnered many results. Once I skimmed through the articles and determined that their content was too broad, I narrowed the search down by using the key term *intellectual freedom in the school library*. This search brought back at least 5 articles by Helen Adams. It was apparent she had written quite a bit on the topic, so I searched *Helen Adams on intellectual freedom*. This search brought back scholarly articles written by her, blogs about her work, interviews conducted with her, and newspaper articles citing her work. Once I began reading some of her work, I learned that book censorship is an important

aspect of the concept of intellectual freedom and it needed an in-depth exploration. Book censorship became one of the main sections in my literature review.

Adams also wrote on FERPA extensively. This prompted me to go into *Academic Search Complete* and *Proquest Central* databases at the James C. KirkPatrick Library Online. There, I used the key terms *FERPA*, *student privacy*, *student confidentiality in the school library*, and *student library records*. The results these searches geared helped me formulate the three main sections of the literature review. I accessed *School Library Journal Online*, the *American Library Association Website*, and a few other journals, using the key terms *student privacy and confidentiality in the school library*, *FERPA*, *history of book censorship*, *book censorship court cases*, and *intellectual freedom in the school library*. These searches geared many relevant results. I narrowed the results down to works that were more recent (i.e. 1999-2016). I disregarded resources and websites with questionable authority.

I also searched for *intellectual freedom studies*, and *book censorship studies*. I found only one study by Lukenbill and Lukenbill. I did, however, find many more court cases. This gave me the idea to examine real life examples of book censorship. Many court cases came from newspaper articles and from *Library Law Blog*. Reading about the court cases prompted me to research strategies for minimizing challenges to books in the first place. This search led me to *Selection and Reconsideration Policies*, and ultimately, Pat Scales. I found Scales' *Teaching Banned Books: 12 Guides for Young Readers* eBook online, and described some of her lesson plans and strategies fro teaching banned texts in this literature review.

Pat Scales brought me back to Helen Adams and her article on advocating for intellectual freedom. This article provided a good framework for the third, and final section of the literature review, as well as a good closure to the paper. The mention of intellectual freedom organizations in the article further prompted me to search *intellectual freedom organizations in Academic Search Complete*.

### **Databases Used**

*James C. KirkPatrick Library Database, Proquest Central, Academic Search Complete* and *ERIC*. Unfortunately, *ERIC* did not provide many full-text articles.

### **Journals Online Used**

*School Library Journal* online, *School Library Media Activities Monthly*, *Knowledge Quest*, *Language Arts journal*, *Education Week*, and *School Libraries Worldwide*.

### **Websites Used**

*Library Law Blog*, and the *American Library Association Website*. A number of Ebooks were also used.

## **Conclusion**

This research literature review examines the issues of protecting student privacy and confidentiality, book censorship, and promoting intellectual freedom in the school library, from three different perspectives. First, it demonstrates what school librarians do know and need to know about the law that protects minor students' privacy and confidentiality in the library. It explores how the Family Educational Rights and Privacy Act (FERPA) applies to student library records, offering suggestions for ways to protect students' privacy and confidentiality. Secondly, the body of research demonstrates the



way in which book censorship has evolved over the years, how it plays out in school libraries, and what school librarians know about the effect court rulings have on students' First Amendment rights to receive information in the school library. Suggestions for ways to handle and minimize challenges to school library materials are offered. Thirdly, it explores strategies for advocating for the intellectual freedom rights of students, mentoring colleagues, teaching students to support intellectual freedom, and finally, creating a culture of intellectual freedom in the school library.

### **Summary**

The introductory chapter of this work begins with a statement of the problem examined, an explanation of the purpose of this paper, and research questions answered by the literature review. This chapter goes on to state possible limitations of the study, definitions of terms unknown to the reader, research strategies and design, and a conclusion.

Chapter two presents the literature review. Drawing from 23 resources, this chapter states the hypothesis and offers a review of the literature on the topic. The chapter is split into three main sections. The first section explores the law as it pertains to student privacy and confidentiality in the school library, and offers strategies for protecting student privacy and confidentiality in the school library. The second section explores the history of book censorship, its evolution, and the way it plays out in school libraries, by examining books censorship court cases and studies. This section also includes strategies for minimizing and handling challenges to school library materials. The third section explores strategies for advocating for the intellectual freedom rights of students,

mentoring colleagues, teaching students to support intellectual freedom, and finally, creating a culture of intellectual freedom in the school library.

The third and final chapter of this work aims to answer the three main research questions posed in chapter one. Each section addresses one of the three main research questions. Firstly, this chapter clarifies how interpretations of the law can enable or hinder school librarians from protecting student privacy and confidentiality in the school library. The second section explains what the common reasons for challenging school library materials are and offers ways in which school librarians can handle or minimize those challenges. The chapter further identifies the role of the school librarian in creating and fostering a culture of intellectual freedom in schools. In conclusion, chapter 3 includes further recommendations and implications of the findings presented in this body of research.

## CHAPTER 2 REVIEW OF THE LITERATURE

### **Introduction**

The topic of intellectual freedom is vast and multi-faceted. Although intellectual freedom is guaranteed to all by the Universal Declaration of Human Rights, it is often challenged or silenced. Intellectual freedom embodies our basic human urge to know. Humans are information seekers concerning that which is unknown or not well understood. By engaging in free inquiry, young learners construct meanings about the way the world functions around them and their own place in it.

The First Amendment to the Constitution guarantees freedom of expression and access to information for all. The school library, built on the democratic values of equitable access to information as stated in the American Library Association's Library Bill of Rights, plays a vital role in the exploration of new ideas and construction of meaning, beliefs, and values. The school library, marked by its guarantee of free access to unlimited resources, becomes a gateway to the world that exists within and outside of the school. Students are dependent on school libraries to exercise their right to free and confidential exploration, experimentation, and inquiry in their quest to seek knowledge and understanding.

This research literature review will examine the issues of protecting student privacy and confidentiality, book censorship, and promoting intellectual freedom in the school library, from three different perspectives. First, it demonstrates what school librarians do know and need to know about the law that protects minor students' privacy and confidentiality in the library. It explores how the Family Educational Rights and Privacy Act (FERPA) applies to student library records, offering suggestions for ways to protect students' privacy and confidentiality. Secondly, the body of research demonstrates the way in which book censorship has evolved over the years, how it plays out in school libraries, and what school librarians know about the effect court rulings have on students' First Amendment rights to receive information in the school library. Suggestions for ways to handle and minimize challenges to school library materials are offered. Thirdly, it explores strategies for advocating for the intellectual freedom rights of students, mentoring colleagues, teaching students to support intellectual freedom, and finally, creating a culture of intellectual freedom in the school library.

### **Chapter Preview**

This research review begins with the general exploration of the law as it pertains to student privacy and confidentiality in the school library, including exceptions to the law. It goes on to present the varied interpretations of the Family Educational Rights and Privacy Act (FERPA), in relation to student records in the school library. The paper suggests different approaches school librarians can employ to protect student privacy and confidentiality in the school library.

The second section of this paper explores the topic of censorship. First, it outlines the historical evolution and trends in book censorship, and continues with a series of

court cases, demonstrating how book censorship plays out in the real world. It continues on with the description of a research study, aiming to determine what school librarians know about and how they support court rulings that affect students' First Amendment rights to receive information. This section concludes with strategies for selecting books, and minimizing challenges to school library materials. The third and final section of this paper is dedicated to advocating for the intellectual freedom rights of students, mentoring colleagues, and teaching students to support intellectual freedom (with sample lessons included), as well as strategies for creating a culture of intellectual freedom in schools.

### **What the Law Says about Student Privacy and Confidentiality**

This section of the paper focuses on exploring what school librarians know and need to know about the law, as it pertains to minor students' privacy and confidentiality in the school library, including exceptions to the law. It explores how the Family Educational Rights and Privacy Act (FERPA) applies to student library records, as well as the problems that stem from the varied interpretations of FERPA. Suggestions for ways to protect student privacy and confidentiality in the school library are offered.

#### **What the Law Says**

Most states in the country, with the exception of Massachusetts, Connecticut, Maine, and Florida, keep minor students' records in the school library confidential. Teachers or principals are not given the right to access students' library circulation records. In addition, most states other than Alaska, Alabama, Colorado, Florida, Georgia, Louisiana, Ohio, New Mexico, South Dakota, Utah, Vermont, Virginia, West Virginia, Wisconsin, and Wyoming, do not give parents access to students' library circulation records (Adams 1).

#### **Exceptions**

The Family Educational Rights and Privacy Act (FERPA) is a federal law established in 1974, which protects the confidentiality of student education records. According to the Family Policy Compliance Office, library circulation records fall under the education records category and cannot be disclosed, unless a teacher seeks information of "legitimate educational interest" (checking a student's standardized test scores or previous year's attendance), in which case the information is requested on the premise of protecting a student's health and safety, or as a result of a court order.

Furthermore, “educators are required by law to report suspected child abuse, but there are also other potential dangers, such as bullying or severe depression” (Adams 1). When concerns about a student’s safety arise, addressing the existent distress usually happens by talking informally and confidentially with the student, or seeking the help of the school counselor or principal.

### **Varied Interpretations of the Family Educational Rights and Privacy Act (FERPA) in Relation to Student Records in the School Library**

The Family Educational Rights and Privacy Act (FERPA) protects the confidentiality of student education records in K-12 and post-secondary schools that receive federal funds. FERPA gives parents the right to access and review the minor student’s education records, as well as request changes. However, it is still unclear whether school library records are considered educational records under FERPA. If library records were educational records under FERPA, parents would have access to the library records of minor children through age 17. Library records are not specifically listed in the definition of “educational records” within the law (Adams 1). Yet, 15 states still allow parents or guardians to legally access library records of minor children. Furthermore, most K-12 schools prefer to interpret library records as non-educational records under FERPA, while librarians in post-secondary school libraries prefer the opposite. But in post-secondary schools, when students are 18 years of age or older, the right to review educational records under FERPA is given to the “adult” student, and the library records would be kept confidential for the student (Adams 1).

The Library Code of Ethics of the American Library Association emphasizes the commitment to protect the confidentiality and privacy of students who seek and use

information in school libraries. These rights are fundamental to the free inquiry and intellectual freedom of all library users. Yet, the absence of a clear definition of “educational records” under FERPA, and gray areas in interpreting state and federal library records privacy laws that apply to students, put librarians in a difficult position in the protection of minor students’ privacy and confidentiality rights (Adams 1).

### **What School Librarians Can Do to Protect Student Privacy**

According to the American Library Association, school library media specialists have a responsibility to promote the principles of intellectual freedom by ensuring access to resources and services that enable free inquiry. This includes protecting student and teacher privacy (ALA Guidelines for Developing a Library Privacy Policy page 1). Protecting student privacy and confidentiality lies primarily within the careful design and revision of a district-wide and school-library privacy policies, in compliance with applicable federal, state, and local laws. These policies specifically address who can access library patron records and the circumstances under which the records can be released. Retention policies will also be included with a records-removal schedule, aiming at retaining as few student library records as possible (Adams 1). A privacy policy communicates the library’s commitment to protecting users’ information and tells library users how their information is being used. It also explains the circumstances under which personally identifiable information might be disclosed. Consulting an attorney when preparing a privacy policy will ensure that the policy is in compliance with applicable state and federal laws. Once the policies have been written, they should be publicly posted. According to the Library Bill of Rights, users have the right to know which policies and procedures govern the retention of personal information, and what



users can do to protect their privacy (ALA Guidelines 1). Furthermore, the library automation software can be password-protected and set to delete student circulation history. The principal, administrators, and teachers should be mentored on the need to keep students records confidential (Adams 1).

Other strategies to safeguard students' privacy and confidentiality include avoiding rearranging library books by reading level, so that students will not be able to see what their classmates' reading levels are and running a course on digital citizenship and the acceptable use of interactive tools (Adams 1). School library personnel are encouraged to educate all policy makers about the dangers of limiting students' privacy rights (ALA Guidelines 2). Finally, encouraging parents to speak directly with their children about their reading choices and what they've checked out from the school library can minimize potential challenges to library materials (Adams 1).

## **Book Censorship: History and Reality. Ways to Minimize Challenges to Library Materials**

The body of research in this section demonstrates the way in which book censorship has evolved over the years. It outlines differing views on book censorship, and their current implications. The paper offers a series of court cases with varied outcomes to demonstrate how book censorship plays out in school libraries.

In addition, one study examines what school librarians know about the effect court rulings have on students' First Amendment rights to receive information. It further explores the librarians' disposition to censoring materials in their libraries. Finally, this section offers strategies for handling and minimizing challenges to school library materials.

### **Historical Evolution of Censorship**

The trends in children's book censorship have evolved significantly over the years. Early censorship attempts, unlike those of the late nineteenth and twentieth centuries, were rarely based on concerns for child protection (Jenkins 228). In the 18th century, slamming books that entertained the imagination marked the trend in censorship of children's books. Books were to be written and selected based on their promotion of morally acceptable behavior, including lessons in social and religious morality. Jean-Jacques Rousseau argued in *Emile* that children should be given nothing but the unvarnished truth. Mrs. Sarah Trimmer who founded *The Guardian of Education*, the first magazine to carry regular reviews of children's literature, agreed with Rousseau and expressed the "dangers" of providing access to children's books that sparked the imagination (Saltman 8). Nineteenth and 20<sup>th</sup> century censorship was marked by the need

to design a set of standards by which to judge children's books. The question is, if children's books are evaluated only by the criteria of moral values and "correct" social and political ideas, then whose moral and cultural values should be applied (Saltman 8)?

**Differing views.** In the United States, lists of challenged books appear every September when bookstores, libraries, and schools celebrate Banned Books Week with displays of books that have been challenged at some point in time. The books in these displays are accompanied by brief reports of the reasons given for the challenge (Jenkins 230). The types of complaints received about books in Canadian and American schools, libraries, and bookstores take many forms and come from many positions on the political and social spectrum (Saltman 9). Throughout time, however, "sensitive-subject" red flags have remained roughly the same for censors: religion, politics, and sexual content (Jenkins 232).

**Liberals.** Liberals object to perceived images of racism, sexism, ageism, elitism, materialism, and cultural appropriation. They judge children's books based on the portrayal of positive images of women, ethnic minorities, senior citizens, and the disabled. The rationale is the promotion of commitment to social change. However, the new realism in children's fiction has prompted a call from some for a return to conservative values and limitations on content (Saltman 9).

**Conservatives.** Conservatives object to bad language and profanity, images of nudity, references to sexuality, homosexuality, ideas that threaten their values, such as the undermining of authority, and content perceived as too mature or inappropriate for children's understanding. For example, Maurice Sendak's *In the Night Kitchen* has been challenged numerous for nudity. Books that present lesbianism, homosexuality, and

same-sex parents are regularly challenged in the United States. Examples include Nancy Garden's young adult novel *Annie on my Mind*, Leslea Newman's picture book *Heather Has Two Mommies*, and Michael Wilhoite's picture book *Daddy's Roommate* (Saltman 10).

**Fundamentalist groups.** Fundamentalist groups on the religious right object to references to the occult, wizards, witchcraft, magic, blasphemy, and moral values that differ from their own (both in picture books and fiction). For instance, in Canada there were objections to the representation of witchcraft in Susan Musgrave's *Hag Head* and in David Booth's educational reading series *Impressions*. In the United States, books challenged for the representation of witchcraft, Satanism, sorcery, and profanity include Eve Merriam's *Halloween ABC*, Barthe Clements' *No Place for Me*, and Katherine Peterson's *Bridge to Terabithia*.

**Individuals/parents.** Individuals or organizations object to depictions that they feel unfairly portray or slander their identity or group. In Canada, for instance, Cherylyn Stacey's *How Do You Spell Abducted?* was criticized for lack of family values and the promotion of hatred to a specific group: men and fathers. Parents object to violence and cruelty in fiction and fairy tales, as well as depictions of death, divorce, and other social problems, which they feel, may cause their children undue emotional distress.

**Common trends.** One study by Alvin Schrader and another conducted later by Dianne Hopkins noted a common observation about the differing emphasis in American and Canadian challenges of children's books. The most common grounds for objections in Canadian libraries between 1985 and 1987 were violence, cruelty, and scary titles. Second were titles deemed unsuitable for a particular age group, in combination with

depictions of sex or violence. Third were objections to nudity, pornography, and sexually explicit content. Fourth were objections to ideas portraying presumed negative moral values. However, noticeably absent from the American studies were challenges on the basis of violence, cruelty, and scary titles. Dianne Hopkins noted in her nationwide study of challenges to materials in secondary school libraries that violence was at the bottom of the list of concerns, while obscenity, sexuality, profanity, and morality ranked highest in the United States (Hopkins qtd. in Saltman 12).

**Implications.** Adults seek to censor books based on their wish to protect presumably easily-influenced and vulnerable children from beliefs and realities that they do not agree with, that they do not want their children to adopt, or that they feel are harmful to their children (Saltman 11). Different levels of censorship exist in school libraries. Parents, students, or other individuals may express a concern about the presence of a book in the library or classroom. Further, they may extend an oral or written complaint regarding the material's presence in the library. Occasionally, there may be a public attack of the book expressed to the media, in order to gain support for the challenge. A board or committee that is charged with deciding the fate of the book might decide that access to the book may be restricted through a written parental permission to check out the book, or have it placed on a shelf that only staff can access. The book may also be relocated, reclassified to a different section of the library, or entirely removed from the library or classroom (Jenkins 232).

Saltman argues, however, that schools, libraries, and bookstores exist in a pluralistic society serving families and cultural and social groups with diverse values and beliefs, backgrounds, and child-rearing practices. This calls for diversity of viewpoints,

values, and opinions in children's books (Saltman 12). Public and school libraries recognize the right of others, including minors, to decide what they will read, and offer access to a broad variety of informational and recreational reading materials to accommodate the diverse interests and needs of youth. Parents play a critical role in this process and are urged to facilitate it by helping children examine how family values relate to those expressed in books.

Often parents guide and restrict their children's access to library materials. In the school library, however, librarians guide children in selecting books but do not restrict access and choices. The role of the librarians and teachers is to defend the freedom to read. Children's exposure to diverse beliefs and truths in books enhances their ability to think critically, make informed decisions, and develop personal value systems and empathetic relationships with others. Children's author and critic Dorothy Butler recommends that adults believe in children's ability to understand complex ideas. She emphasizes that the representation of concepts and opinions perceived to be "morally invaluable" does not endorse them but rather gives every young reader the freedom to express their own. According to Butler, "intolerance of differing views in children's books easily leads to vigilante tactics, censorship and the suppression of the imagination" (Butler qtd. in Saltman 13).

### **How Censorship Plays Out in School Libraries: Court Cases**

Book censorship in the school library can play out differently, depending on the material in question, the person or group making the complaint, or any underlying causes for the challenge. In some cases, book censorship results from the discontent of a group or an individual pertaining to a library material in the school library, or to a school

district's Internet filtering system. Furthermore, in some cases, the school district's final decision about the library material leaves a complainant dissatisfied, and prompts one to appeal the case to court. The following compilation of court cases shows the most common reasons for challenges to school library books, and demonstrates the varied outcomes of those challenges.

**Court case 1.** The American Civil Liberties Union and the ACLU of Eastern Missouri filed a lawsuit against the Camdenton R-III School District in August of 2011 after repeated warnings that its custom-built filtering software discriminates against lesbian, gay, bisexual, and transgender (LGBT) content. The filter has a category that blocks LGBT-supportive information, including hundreds of websites that are not sexually explicit in any way. Furthermore, the filter allows students to view anti-LGBT sites that condemn homosexuality or opposed legal protections for LGBT people.

A Federal Court ruled that the district must stop censoring Web content geared toward the lesbian, gay, bisexual, and transgender (LGBT) communities through its discriminatory filtering software. The ruling ordered the district not to block content based on the viewpoints expressed by the website. The court also concluded that other filtering systems are available and are more effective in filtering out pornography, but websites that express a positive viewpoint toward LGBT individuals are to be allowed (Targeted News Service 1).

**Court case 2.** *The Chocolate War* by Robert Cormier, and *I Was a Teenage Fairy* by Francesca Lia Block were both challenged in Virginia elementary and middle schools. Parents sought to restrict the books to older audiences, due to mature themes. Cormier's 1974 book deals with a teenager who has just lost his mother to cancer and refuses to sell

candy during a school fundraiser. Block's book features a victim of sexual molestation who decides to take on her abuser.

The Alexandria County School District Board voted against the restrictions and decided that *The Chocolate War* will stay in Fairfax elementary school libraries, while *I Was a Teenage Fairy* will remain on middle school library shelves. The rationale for the decision made by district officials emphasized the notion that students draw many lessons about life from books with mature themes. Parents, however, were urged to monitor their children's reading closely (Kalita 1).

**Court case 3.** In 2009, Juan Amador Rodriguez, a parent of a Miami elementary school student, requested that *Vamos a Cuba* be removed from his child's school library, because it represented an inaccurate representation of life in Cuba. The book was intended to introduce students ages 4-8 to life in other countries. As a former political prisoner, under the rule of Fidel Castro, Rodriguez claimed that the book distorted reality by representing life in Cuba as too cheery. A big controversy ensued, where the school board members in Miami decided to remove the book from the shelves of Miami-Dade school libraries. The American Civil Liberties Union (ACLU) of Florida appealed the decision to the U.S Supreme Court, citing censorship based on the presentation of points of view that the school board members found disagreeable. ACLU expressed that the real reason for the removal of the book were not the inaccuracies in it, but rather the political correctness board members sought to preserve.

The U.S. Supreme court declined to hear the challenge to the school board's decision to remove the book on the premise that the school board's decision was not censorship in violation of the First Amendment. Rather, the court said, the board removed



the book because it contained factual inaccuracies. Those against the ban of *Vamos a Cuba* stressed that other books could be included on library shelves to offer a more rounded view of Cuba. They said removing and banning the book was censorship (Barco 78-85).

**Court case 4.** In March 1987, an Alabama judge ordered public school districts in the entire state to remove 44 state-approved social studies, history, and home economics textbooks from classrooms, because they allegedly promote “secular humanism.” The U.S. Court of Appeals reversed that decision in August that year. Generally, courts give the control to state and local school districts to determine what they will teach and which materials to use. However, in the 1968 case of the state of Arkansas prohibiting the teaching of evolution, the Supreme Court invalidated the restriction because of its violation of the Establishment Clause of the First Amendment. That prohibition was based on religious dogma. Similarly, the removal of the textbooks in Alabama was ruled unconstitutional, because it violated the constitutional separation of church and state (Reichman 3-4).

**Court case 5.** In 1975 the Island Trees Union Free School District in New York, ignoring the recommendations of the book review committee of parents and school staff it appointed, ordered the removal of nine books from the district’s junior high and high school libraries. The Board stated that the books were anti-Christian, anti-American, anti-Semitic, and “just plain filthy” (Fiore 97). Steven Pico, acting on behalf of other students, challenged the Board’s decision to remove the books in District Court. The district court supported the board’s actions.

However, this ruling was reversed by the United States Court of Appeals, granting permission for a trial based on Pico's allegations that the board's action violated students' First Amendment Rights. The main questions taken into account were whether the First Amendment imposes any limitations on the discretion of the board to remove the library books, and whether the board overstepped those limitations, resulting in a violation of students' First Amendment rights. In a plurality decision (five-to-four), the Supreme Court affirmed the Court of Appeal's ruling. Despite the plurality decision, all judges agreed that removal of a book with the intent to deny access to its ideas is unconstitutional (Fiore 97).

**Censorship cases in the state of Missouri/an examination of public records.**

Students in a course taught by Professor Charles Davis at the Missouri School of Journalism sent Sunshine requests for public records of challenges to all 566 school districts in the state. The letters asked the districts to provide all correspondence regarding book challenges since January 1, 2008. Four-hundred-and-ninety-five Missouri school districts responded.

The records revealed that the majority of the challenges were not as much about the overall content of the book as they were about the book's appropriateness for certain age groups. In some cases, books were challenged on the premise that they were inconsistent with community values and contained language and references to behavior that conflicted with school conduct rules. For instance, *The Face on the Milk Carton* by Caroline B. Cooney was challenged by a parent of an elementary school student because it contained descriptions of sexual situations.

In Republic, Missouri, Kurt Vonnegut's classic *Slaughterhouse-Five* and two other books were labeled as “soft porn” by the challenger. The school district received national attention when it banned Vonnegut's book. The decision was later reversed.

In Camdenton, *The Kite Runner* by Khaled Hosseini was challenged because it featured a rape scene. Parents felt that it shouldn't be a required reading in an honors English class. The book was removed from the curriculum but remained on library shelves.

In Jackson, a mother of an 11 year old argued that *The Hunger Games* by Suzanne Collins was too violent. The district kept the book without restrictions. In Wentzville, *Baby Animals – Puppies* by Kate Petty was challenged because the book referred to a female dog as a “bitch”. The word was used in context and the school district retained the book.

**Decisions.** Of all the challenged books, twelve were banned by the school districts. Another eleven were removed from required reading lists, labeled with “young adult” stickers or restricted in some other way. Twenty-nine of the 53 challenges were rejected and the books stayed. The result of one challenge was unreported. Generally, challengers objected to sexual themes, violent content, racial slurs and references to religion, the paranormal, self-injury, drugs, and alcohol.

National organizations that opposed the majority of the bans of books included the Writers Hall of Fame, The American Library Association, the National Coalition Against Censorship, the Association of American Publishers, and the American Civil Liberties Union of Kansas and Western Missouri. To respond to challenges, schools evaluate complaints by looking at the entire book, not just particular passages. When they

retain books, many schools cite important themes in the books that generate constructive classroom discussions or intellectual exploration on the part of the reader (Missouri Book Challenges Run Gamut 198-226).

### **What School Librarians Know about and How They Support Court Rulings That Affect Students' First Amendment Rights to Receive Information**

When challenges to materials occur in the school library, the first person to receive a complaint is usually the school librarian. School librarians' responses to challenges often depend on one's knowledge of the law and court rulings that affect students' First Amendment rights to receive information. Furthermore, book challenges often become a testament to the librarian's own disposition to follow the law and protect students' First Amendment rights. Lukenbill and Lukenbill conducted a study to test both – school librarians' knowledge of the law and their attitudes and dispositions regarding their obligations to protect students' First Amendment rights. The researchers sought to understand the level of judicial knowledge that a sample of Texas school librarians held regarding basic federal court rulings and the effects that these rulings have on censorship of school library media materials. Also, it attempted to assess how the librarians perceived their likely behaviors regarding their obligation to follow the law, and act to protect and facilitate students' First Amendment rights to receive information. An additional reason for the study was to examine whether the results called for a paradigm shift in the education of school library media specialists. The study sought to assess whether more attention should be given to the need to protect the rights of youth, in order to better understand constitutional law, and establish the school library as an open forum for debate in American society (Lukenbill and Lukenbill 10).

The sample for the study was drawn from a group of Texas school librarians. The average age of the participants was fifty, ranging from thirty to sixty-nine. There were 136 women (93 percent), and 9 (6 percent) men. Of the sample, 104 (70 percent) held master's degrees, 39 (26 percent) bachelor's degrees, 3 (2 percent) held doctorates, and 2 (1 percent) had high school or less education. The highest level of school library certification (the Learning Resources Certification) was held by 83 (57 percent) of the sample, the second-highest certification level (the endorsement level) was held by 39 (26 percent) of respondents, and 3 (2 percent) were studying toward certification (Lukenbill and Lukenbill 11).

Lukenbill and Lukenbill sought to answer the following questions:

1. What is the level of judicial knowledge concerning important court rulings relating to censorship among school librarians both prior to and including Pico?
2. Do librarians agree with the major rulings announced by the Supreme Court in Pico?
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 items from a collection?

7. How willingly are they to turn for help outside the school system when ordered to remove items from a collection (Lukenbill and Lukenbill 12)?

Lukenbill and Lukenbill found that 81 out of 150 respondents reported that they had not had a challenge to materials within the last year, while only four indicated that they often experienced censorship challenges. Respondents were presented with a list of several important court rulings and asked to indicate their knowledge or awareness of these. These court rulings included *Miller v. California* (413 U.S. 15), *Tinker v. the Des Moines (Iowa) School District* (393 U.S. 503), *President Council, District 25 v. Community School Board No. 25* (457 F. 2d 289), *Right to Read Defense Committee of Chelsea (Massachusetts) v. School Committee of the City of Chelsea* (454 F. Supp 703), and *The Board of Education Island Trees, New York v. Pico* (457 .U.S. 853). Of 149 responses, 103 reported that they had never heard of *Miller v. California*, while 10 reported that they had a general concept of its importance. No librarians reported that they knew and understood it well. Similar findings were found for court rulings that affected school library collections: *Tinker v. Des Moines*, *President Council v. Community School Board*, and *Right to Read v. School Committee of City of Chelsea* (Lukenbill and Lukenbill 13).

*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, 82 librarians stated that they had never heard of it, while 2 indicated that they knew and understood it well. Librarians generally agreed with the Court's ruling. Twenty-eight of 147 responses supported the

ruling completely, 61 generally agreed with the concepts of the ruling, and 43 stated that they were in agreement with its concepts. This is an agreement rate of 90.3 percent (Lukenbill and Lukenbill 18).

This study indicates that, generally, school librarians appear to understand the need to resist censorship of library materials in their charge, and that in many cases they are willing to explain to administrators and boards members some of the legal issues involved in removing challenged materials from collections. What is lacking, however, is a deep awareness and fundamental knowledge of court interpretations of constitutional law, how these rulings affect school library collections, issues surrounding freedom of speech rights, and students' legal rights to receive information. The study concludes that there is a need for a new curriculum, or at least a readjustment of existent ones, and improved instructional approaches to correct some of the inadequacies of the legal knowledge of school librarians and their awareness of their constitutional obligations to protect students' access to information intellectual freedom rights.

The authors recommend that teaching the rules and application of the law and school libraries' constitutional responsibilities is to be based on a fundamental understanding of community sociology, and the political elements in community structures that determine 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 necessary within the instructional process (Lukenbill and Lukenbill 22-38).

### **Book Selection and Minimizing Challenges to Library Materials**

When book challenges occur, a number of strategies can be employed to better handle them. Librarians are encouraged to draw from the school library's selection and reconsideration policies and procedures to respond to the challenges. Strategies for minimizing the potential for challenges altogether are also offered.

**Handling challenges to books.** In 2005, a parent of two students attending Fayetteville, Ark., school district pushed for officials to remove more than 50 books from the middle and high school libraries, for content she considered sexually explicit and too mature for teens. Mrs. Barnett, the Fayetteville High School librarian, was forced to re-examine her selection policy and procedures. Although district officials decided to keep all challenged books on the library shelves, citing the curricular value of the books, they came to the conclusion that their policies and procedures for handling challenges lacked clarity in defining the process and timeliness for answering challenges, and therefore, needed to be rewritten (Manzo 26).

Since then, district administrators and librarians have designed more structured guidelines for addressing parents' concerns over library collections and instructional materials. The policy defines a step-by-step process for parents to follow when challenging library materials. Parents must first read the entire book, discuss it with a teacher or librarian, and outline their concerns in a written "request for reconsideration". If the principal cannot resolve the parent's concerns, the complaint works its way through the district administration, and could eventually be turned over to a review committee selected by the superintendent (Manzo 27).

Fayetteville district officials have worked to train librarians and school principals to handle initial discussions with parents before the complaint proceeds up the district



hierarchy. When book complaints arise, librarians are to be prepared to give a clear explanation of the library's procedure for registering a complaint, and when a decision can be expected. In addition to giving parents and administrators clear guidelines to handling challenges of library materials, a step-by-step policy also allows parents to express their concerns, which can minimize the negative emotions that such complaints fuel. The policy shields school librarians and teachers from receiving personal attacks on the intent and integrity of their selection choices (Manzo 27).

In addition to creating a clear selection policy to guide librarians' responses to book challenges, The Galax School District in Virginia, for instance, has appointed a book committee. The committee's primary goal is to further guide teachers and librarians in selecting books with the content they want to offer their students (Desalvo 7). While Selection Policies and Procedures provide guidance and support in handling book challenges, there are additional strategies librarians can use to minimize the potential for challenges, in the first place.

**Minimizing challenges to books.** One such strategy to minimizing challenges to books and instructional materials, as suggested by the National Council of Teachers of English (NCTE), is providing rationales for the use of potentially controversial literary works and films, outlining how they meet academic standards (Manzo 28). Teachers are encouraged to draft their own rationales and lessons. Pat R. Scales, a former middle school librarian in Greenville, S.C., offers lessons for teaching such materials in her book *Teaching Banned Books*. The book offers strategies for teaching a dozen texts that are often the subject of formal complaints in the middle grades. If parents object to certain assigned readings, teachers and librarians can give students an alternative choice to

complete the assignment. Scales insists that precisely because of these controversial texts, difficult issues can be raised and discussed within the safety of a classroom (Scales qtd. in Manzo 28).

## **Advocating for the Intellectual Freedom Rights of Students, and Creating a Culture of Intellectual Freedom in Schools**

Issues pertaining to student privacy and confidentiality in the school library, book censorship, and students' First Amendment rights to receive information lead to the in-depth exploration of the topic of intellectual freedom, as a whole. How might one define the term Intellectual Freedom? The American Library Association states: "Intellectual freedom is the right of every individual to both seek and receive information from all points of view without restriction. It provides for free access to all expressions of ideas through which any and all sides of a question, cause or movement may be explored" (ALA Intellectual Freedom Brochure 1).

The third, and final section of this paper explores strategies for advocating for the intellectual freedom rights of students, mentoring colleagues, and teaching students to support intellectual freedom. It includes intellectual freedom sample classroom lessons and activities. Finally, it discusses the means to creating a culture of intellectual freedom in the school library.

### **Advocating Intellectual Freedom**

The terms intellectual freedom and censorship were not specifically referred to, as such, before the 1930's. Yet, book lists, purchasing guides, articles by librarians, school library standards, and selection policies and procedures gave some insight into the development of the concept. However, the most growth in support of intellectual freedom in the public school library field in the United States occurred in the 1920's and 1930's (Butler 30).

Proclaimed by the United Nations in 1948, the Universal Declaration of Human Rights states in article 19 that everyone has the right to freedom of opinion and expression. Article 26 specifically focused on the importance of education to the development of intellectual freedom. The purpose of education is to promote the full development of the human personality, and strengthen respect for human rights and fundamental freedoms (The Universal Declaration of Human Rights qtd. in Butler 30).

Article I of the American Library Association's *Library Bill of Rights* describes all libraries as forums for information and ideals. Physical access to information is listed as the first principle. "Materials should not be excluded because of the origin, background, or views of those contributing to their creation" (ALA Advocating For Intellectual Freedom 1). Article II of the *Library Bill of Rights* emphasizes the importance of fostering intellectual access to information by providing materials that allow users to evaluate content and context, and find information representing multiple points of view. Doctrinal or partisan disapproval does not warrant the removal of materials (ALA Advocating For Intellectual Freedom 1).

Thus, the role of public and school libraries across the world is to empower lifelong learners by promoting the free expression and interchange of ideas. The library provides equitable physical and virtual access to information, so that individuals can explore ideas, evaluate information, draw meaning, develop conclusions, and express new ideas. Strengthening intellectual and physical access to information builds a foundation of intellectual freedom, as well as appreciation for the intellectual freedom rights of all individuals (ALA Advocating for Intellectual Freedom 1).

### **Mentoring Colleagues and Teachers to Support Intellectual Freedom in Schools**

The Universal Declaration of Human Rights and the Library Bill of Rights have paved the way for the development and support of intellectual freedom in schools. As such, these documents are indispensable aids to school librarians, as they work to foster a culture of intellectual freedom in classrooms across the nation. Adams suggests school librarians begin by taking the leading role in mentoring colleagues and teachers to support intellectual freedom in schools (Adams 30).

**Mentoring strategies in the profession.** More experienced school librarians are encouraged to mentor new librarians on how to use the school district's selection policy and procedures, rather than react when challenges to materials occur. New librarians learn that the challenge of a material is not a personal attack on their judgment. Giving new librarians tips on how to listen actively when faced with a challenge, rather than comment for or against the concern, aids them in their dialogue with the complainant (Adams 30).

Because each situation involving intellectual freedom and access to materials is unique, Barbara Stripling developed a Collection Development Policy in 2012, which includes a form and procedures for reconsideration of a work, in order to mentor New York City Public School librarians on intellectual freedom. The policy was modeled after the one used in Fayetteville, Arkansas. When the policy was approved for use in all New York Public Schools, it was included in the intellectual freedom section of the New York librarian's handbook (Adams 31).

**The role of professional associations in mentoring.** State associations support mentoring for intellectual freedom through their intellectual freedom committees, programming opportunities, and association special interest groups. For instance, the

Wisconsin Educational Media and Technology Association (WEMTA) has an Intellectual Freedom (IF) Network comprised of four school librarians who have experienced challenges, and one technology director who is knowledgeable about Internet filtering and other technology-related concerns. School librarians needing assistance with challenged materials and intellectual freedom issues are referred to a WEMTA IF Network member by knowledgeable librarians at the Cooperative Children's Book Center (CCBC) in the University of Wisconsin-Madison's School of Education (Adams 31).

Another organization extending help to librarians is the Vermont School Library Association (VLSA), which designed a brochure, based on Vermont's Confidentiality of Library Records Law, about students' privacy rights in school libraries. A LibGuide containing resources on book challenges and intellectual freedom help prepare librarians for such challenges. The LibGuide can be found here <<http://chs.csdvt.libguides.com/intellectualfreedom>> (Adams 2013). The ALA's Office for Intellectual Freedom (OIF) offers telephone and e-mail support for school (and other) librarians concerned about intellectual freedom issues such as resource challenges, restrictive filtering, and student privacy. OIF's assistant director, Angela Maycock mentors school librarians with individual queries on a case-by-case basis (Adams 31).

**Mentoring outside the profession.** Principals, teachers, and technology directors do not learn about intellectual freedom in their preparation courses. Librarians are encouraged to take the leading role in mentoring colleagues to support students' access to information and the principles of intellectual freedom (Adams 32). Erlene Bishop Killeen is a school librarian in a Wisconsin district that does not filter Internet access for students. Instead, students are guided by a strong Acceptable Use Policy (AUP) that emphasizes

teaching them to be good digital citizens. When the Children’s Internet Protection Act was enacted in 2000, Killeen worked closely with the district’s new technology director to develop the district’s AUP (Adams 32). Sara Kelly Johns, a secondary school librarian in New York mentors new administrators and teachers by discussing library-related policies and plans of action in instances of material challenges, while referring them to resources from ALA and the New York Library Association for help (Adams 32).

**Passing the torch.** Cases of book challenges and censorship are on the rise. As a result, sharing knowledge and experience in intellectual freedom issues has become increasingly important. Formal and informal mentoring provided by supervisors, colleagues, and state and national associations “passes the flame of intellectual freedom forward” to continuing the protection of students’ privacy and access to information (Adams 32).

### **Teaching Students to Support Intellectual Freedom**

Classrooms can provide powerful grounds for advocating intellectual freedom. The classroom can be used as a forum where students express their views on intellectual freedom, understand their options when using books that might offend them, and have the opportunity to think, speak, and be heard. One way to use the classroom in the development and promotion of free inquiry is by preparing lessons on the First Amendment, while also connecting social studies with English curricula (Scales 3). Students make connections in the exploration of their Constitutional personal rights and responsibilities when they are engaged in discussions in the study of the Constitution.

**Sample classroom lesson 1.** Have the class read copies of the First and Fourteenth Amendments. Ask the students to discuss what the First Amendment means to

them. What would happen to our society if all ideas were censored? At what point does one relinquish one's First Amendment rights? How are the First and Fourteenth Amendments related (Scales 3)?

Display the following books: Maurice Sendak's *Where the Wild Things Are*, William Steig's *Sylvester and the Magic Pebble*, Carolivia Herron's *Nappy Hair*, Judy Blume's *Are You There, God? It's Me*, Margaret Lois Lowry's *The Giver*, Phyllis Naylor's *Shiloh*, Christopher Paul Curtis's *The Watsons Go to Birmingham—1963*, J. K. Rowling's *Harry Potter* books, and Paul Zindel's *The Pigman*. Ask students how many of them have read these books. Then, ask them to identify reasons why some people find these titles objectionable. Have them answer the question how banning these books violates their First Amendment rights (Scales 4).

**Discussion.** Discuss the difference between a book challenge and censorship. How would your life be affected if we didn't have the First Amendment? Explain the following statement: Every time we listen to another person's opinion, we are supporting the principles of intellectual freedom. Censorship is really about gaining "power" and "control" over what others believe and think. Organized religious groups bring many book challenges. Why does this happen? Why did our forefathers feel it necessary to include an amendment to the Constitution that guarantees freedom of religion to all Americans? Discuss the relationship between freedom of religion and freedom of expression. Explain the following quote by John Morley: "You have not converted a man because you have silenced him." How is book censorship an attempt to "silence" the writer and the reader? In the Pico censorship case (1982), one school board member said, "I would not dream of trying to take that book out of the public library. That would be



“censorship-and we are not censors.” What are your feelings regarding this statement? Why would he think that removing a book from the school library would not be censorship? How is the mission of a school library similar to that of a public library? How is it different (Scales 4)?

**Reflection.** Elements and topics in books and movies that are often the targets of censors are profanity, racism, violence, magic and witchcraft, and sex. Some people believe that books with these elements provide “bad” role models for young readers. How might reading these books allow readers the opportunity to better understand these elements in our society and to discuss ways to deal with them (Scales 5)?

**Sample classroom lesson 2.** Find out your school district’s procedure for dealing with challenged books and materials. Invite a member of the materials review committee or a member of the school board to speak to your class about local challenges. Prepare questions for the speaker. Read *Annie on My Mind* by Nancy Garden. Then, use the Internet to research the censorship case that occurred with Garden’s book in Olathe, Kansas. High school students played a significant role in “Saving Annie” by asking the courts to force the school superintendent to return *Annie on My Mind* to the library shelves of their high school. How is Garden’s book about discrimination? How is the Kansas censorship case about discrimination? Write a short paper that draws a parallel between the actions of the school administrators in the novel and those of the Olathe school superintendent (Scales 6).

**Sample classroom lesson 3.** Research the purpose of each of the following organizations: the American Library Association’s Office for Intellectual Freedom, the American Civil Liberties Union, the National Coalition against Censorship, the First

Amendment Congress, and People for the American Way. Make brochures describing the mission of each organization. Include mailing addresses, Internet addresses, and telephone numbers. Display the brochures in the school library (Scales 6). Once students have spent time researching the topics and pondering questions about intellectual freedom, censorship, and First Amendment rights, provide a list of additional fiction and non-fiction books. Have student discuss how the character portrayals and dilemmas in the books could aid them in the future in decision-making and knowledge of their freedom to know (Scales 19).

### **Creating a Culture of Intellectual Freedom in Schools**

Creating a culture of intellectual freedom in schools goes beyond dealing with filtering issues and talking to school administrators about students' First Amendment rights to receive information. It is a lifelong effort to instill, promote, and act on the democratic values of our society. It is necessary to protect basic human rights and freedoms.

**Personalizing the battle for intellectual freedom.** Adams, Luhtala, and Harris suggest that, when addressing intellectual freedom, school librarians focus on the patriotic theme of the "freedom to read," rather than focusing solely on banned books promotion. Librarians are urged to incorporate all types of books into a display or event, and involve students and teachers in the support of intellectual freedom by asking them to provide examples of sites that they have been blocked from by the schools' filtering systems, for the display (Ballard 32).

Engaging students and teachers can personalize the battle for intellectual freedom. In addition, librarians and teachers can incorporate a monthly activity into their

classrooms to keep the issue on the forefront. The library can create an Intellectual Freedom (IF) calendar for the year, with a specific target area of focus for each month. For example, in August, meet with the principal and administrative team to review your collection development policy and ask for five minutes at the first faculty meeting to remind everyone of the reconsideration process (Adams qtd. in Ballard 33).

**The participatory nature of learning.** Lessons that engage students in selection of materials, as they learn to be thoughtful and responsible users of digital resources, can help them learn to regulate their online behavior in the future. Luthala suggests that we let the kids be the filter (Luhtala qtd. in Ballard 33). While images deemed obscene, child pornography, and images deemed harmful to minors are required to be filtered in schools, according to the Children's Internet Protection Act (CIPA), the law doesn't explicitly regulate the filtering of text. CIPA does not address filtering of social media, image sites, or online word processors used to upload an image. Educational groups like the National School Boards Association and the Consortium for School Networking (CoSN) actively support a more balanced approach to filtering that emphasizes educating students on responsible use, as opposed to blocking sites. The best way to talk to administrators about over-filtering is to acknowledge the concerns, and then shift the discussion to a student-focused review of educational impact (Harris qtd. in Ballard 34).

In the context of the participatory nature of learning, social media and anonymous messaging pose a risk to the protection of student privacy online, but restrictive filtering is not the answer to this concern. Rather, negotiating participatory skills, explicit instruction on digital citizenship, and involving students in pledging to avoid apps that may compromise their privacy, while refusing to engage in bullying, can prove more

effective (Harris, qtd. in Ballard 2015). Being proactive in teaching digital citizenship, and working with students on accountability, responsibility, and ethical use of digital resources “are the key areas for school librarians moving forward” (Harris qtd. in Ballard 37).

### **Conclusion**

Creating a culture of intellectual freedom in schools involves a multi-faceted approach. Bringelson asks, who, among us, is not a potential censor (Bringelson 48)? Censors often seek to shield young people from sexuality, violence, and bad language. However, one cannot pretend that those things do not exist in the world. The point to intellectual freedom shifts the focus away from the idea that books hold a negative power, and emphasizes their power to transform. Allowing children and youth free access to diverse ideas, presented in multiple formats, prompts them to grow, and challenges them to figure out what the world is about, as well as their place in it. It instills a willingness to make the world a better place. “By ensuring access to a wide variety of materials, we can indeed nurture intellectual freedom: the freedom to roam wherever our minds may lead” (Bringelson 50).

## CHAPTER 3 CONCLUSIONS AND IMPLICATIONS

### **Introduction**

This research literature review examines the issues of protecting student privacy and confidentiality, book censorship, and promoting intellectual freedom in the school library, from three different perspectives. First, it demonstrates what school librarians do know and need to know about the law that protects minor students' privacy and confidentiality in the library. It explores how the Family Educational Rights and Privacy Act (FERPA) applies to student library records, offering suggestions for ways to protect students' privacy and confidentiality. Secondly, the body of research demonstrates the way in which book censorship has evolved over the years, how it plays out in school libraries, and what school librarians know about the effect court rulings have on students' First Amendment rights to receive information in the school library. Suggestions for ways to handle and minimize challenges to school library materials are offered. Thirdly, it explores strategies for advocating for the intellectual freedom rights of students, mentoring colleagues, teaching students to support intellectual freedom, and finally, creating a culture of intellectual freedom in the school library.

### **Chapter Preview**

The third, and final chapter aims to answer three main questions posed in the introduction of this work. First, it aims to define the nature of the law that protects minor students' privacy and confidentiality in the school library, and explain why its varied interpretations can be problematic for school librarians. Secondly, it answers questions pertaining to the most common reasons for challenging school library materials, and ways in which school librarians can handle and minimize those challenges. Thirdly, it defines the role of the school librarian in creating and fostering a culture of intellectual freedom in schools. In conclusion, recommendations and implications of the findings are explored.

### **Interpreting State and Federal Library Records Privacy Laws**

Most states in the country, with the exception of Massachusetts, Connecticut, Maine, and Florida, keep minor students' records in the school library confidential. Teachers or principals are not given the right to access students' library circulation records. In addition, most states other than Alaska, Alabama, Colorado, Florida, Georgia, Louisiana, Ohio, New Mexico, South Dakota, Utah, Vermont, Virginia, West Virginia, Wisconsin, and Wyoming, do not give parents access to students' library circulation records (Adams 1).

The Family Educational Rights and Privacy Act (FERPA), a federal law established in 1974, protects the confidentiality of student education records in K-12 and post-secondary schools that receive federal funds. According to the Family Policy Compliance Office, library circulation records fall under the education records category and cannot be disclosed, unless a teacher seeks information of "legitimate educational interest," in which case the information is requested on the premise of protecting a

student's health and safety, or as a result of a court order. FERPA does give parents the right to access and review the minor student's education records, as well as request changes. However, it is still unclear whether school library records are considered educational records under FERPA. If library records were educational records under FERPA, parents would have access to the library records of minor children through age 17. Library records are not specifically listed in the definition of "educational records" within the law (Adams 1). Yet, 15 states still allow parents or guardians to legally access library records of minor children.

The Library Code of Ethics of the American Library Association emphasizes the commitment to protect the confidentiality and privacy of students who seek and use information in school libraries. These rights are fundamental to the free inquiry and intellectual freedom of all library users. Yet, the absence of a clear definition of "educational records" under FERPA, and gray areas in interpreting state and federal library records privacy laws that apply to students, put librarians in a difficult position in the protection of minor students' privacy and confidentiality rights (Adams 1).

### **Common Reasons for Challenging School Library Materials, and Ways in Which School Librarians Can Handle or Minimize Those Challenges**

Different levels of censorship exist in school libraries. Parents, students, or other individuals may express a concern about the presence of a book in the library or classroom. Further, they may extend an oral or written complaint regarding the material's presence in the library. Occasionally, there may be a public attack of the book expressed to the media, in order to gain support for the challenge. A board or committee that is charged with deciding the fate of the book might decide that access to the book may be

restricted through a requirement for written parental permission to check out the book, or have it placed on a shelf that only staff can access. If a challenge is successful, the book may also be relocated, reclassified to a different section of the library, or entirely removed from the library or classroom (Jenkins 232).

When students in a course taught by Professor Charles Davis at the Missouri School of Journalism examined public records of challenges to all 566 school districts in the state, the records revealed that the majority of the challenges were not as much about the overall content of the book as they were about the book's appropriateness for certain age groups. In some cases, books were challenged on the premise that they were inconsistent with community values and contained language and references to behavior that conflicted with school conduct rules (Missouri Book Challenges Run Gamut 198-226). Generally, challengers objected to sexual themes, violent content, racial slurs and references to religion, the paranormal, self-injury, drugs, and alcohol.

To respond to challenges, schools evaluate complaints by looking at the entire book, not just particular passages. When they retain books, many schools cite important themes in the books that generate constructive classroom discussions or intellectual exploration on the part of the reader (Missouri Book Challenges Run Gamut 198-226). Librarians are encouraged to draw from the school library's selection and reconsideration policies and procedures to respond to the challenges. The policy defines a step-by-step process for parents to follow when challenging library materials. For example, a policy might state that parents must first read the entire book, discuss it with a teacher or librarian, and outline their concerns in a written "request for reconsideration." If the principal cannot resolve the parent's concerns, the complaint works its way through the



district administration and could eventually be turned over to a review committee selected by the school district superintendent (Manzo 27).

Other strategies for handling and/or minimizing book challenges include giving parents a clear explanation of the library's procedure for registering a complaint, and providing rationales for the use of potentially controversial literary works and films, outlining how they meet academic standards (Manzo 28). Teachers are encouraged to draft their own rationales and lessons. If parents object to certain assigned readings, teachers and librarians can give students an alternative choice to complete the assignment (Scales qtd. in Manzo 28).

### **The Role of the School Librarian in Creating and Fostering a Culture of Intellectual Freedom in Schools**

Article 26 of the Universal Declaration of Human Rights specifically focused on the importance of education to the development of intellectual freedom. The purpose of education is to promote the full development of the human personality, and strengthen respect for human rights and fundamental freedoms (The Universal Declaration of Human Rights qtd. in Butler 30). The American Library Association's *Library Bill of Rights* describes all libraries as forums for information and ideals. The document emphasizes the importance of fostering intellectual access to information by providing materials that allow users to evaluate content and context, and find information representing multiple points of view (ALA Advocating For Intellectual Freedom 1).

Thus, the role of public and school libraries across the world is to empower lifelong learners by promoting the free expression and interchange of ideas. The library provides equitable physical and virtual access to information, so that individuals can

explore ideas, evaluate information, draw meaning, develop conclusions, and express new ideas. Strengthening intellectual and physical access to information builds a foundation of intellectual freedom, as well as appreciation for the intellectual freedom rights of all individuals (ALA Advocating for Intellectual Freedom 1). Adams suggests school librarians begin by taking the leading role in mentoring colleagues and teachers to support intellectual freedom in schools, by mentoring new librarians on how to use the school district's selection policy and procedures. Giving new librarians tips on how to listen actively when faced with a challenge, rather than comment for or against the concern, aids them in their dialogue with the complainant (Adams 30). In addition, librarians are encouraged to seek the help of professional organizations such as the Wisconsin Educational Media and Technology Association's (WEMTA) Intellectual Freedom (IF) Network, the Vermont School Library Association (VLSA), and the ALA's Office for Intellectual Freedom (OIF) to guide librarians in handling challenged materials and the promotion of intellectual freedom in their schools (Adams 31).

In the school library and in the classroom, librarians and teachers are encouraged to teach students about the promotion of free inquiry and intellectual freedom by preparing lessons on the First Amendment, as well as lessons that use challenged and banned books. Students can make connections in the exploration of their Constitutional personal rights and responsibilities by researching censorship cases, examining the mission of intellectual freedom organizations, and learning about their school district's procedures for dealing with challenged books. Examining controversial issues in challenged texts helps students think about the way in which these controversial themes

manifest in the society, and prompts students to discuss ways to deal with them (Scales 19).

Furthermore, participatory learning in schools calls for lessons that engage students in the selection of materials, as they learn to be thoughtful and responsible users of digital resources (Luhtala qtd. in Ballard 33). Educating students on responsible use of digital resources, negotiating participatory skills, explicit instruction on digital citizenship, and involving students in pledging to avoid apps that may compromise their privacy, while refusing to engage in bullying, can prove more effective than blocking sites (Harris qtd. in Ballard 2015). Being proactive in teaching digital citizenship, and working with students on accountability, responsibility, and ethical use of digital resources “are the key areas for school librarians moving forward” (Harris qtd. in Ballard 37).

### **Implications and Recommendations**

As previously indicated, the absence of a clear definition of “educational records” under FERPA, and gray areas in interpreting state and federal library records privacy laws that apply to students, put librarians in a difficult position in the protection of minor students’ privacy and confidentiality rights (Adams 1). Thus, protecting student privacy and confidentiality lies primarily within the careful design and revision of a district-wide and school-library privacy policies, in compliance with applicable federal, state, and local laws. These policies specifically address who can access library patron records and the circumstances under which the records can be released. Retention policies will also be included with a records-removal schedule, aiming at retaining as few student library records as possible (Adams 1). Furthermore, the library automation software can be

password-protected and set to delete student circulation history. School library personnel are encouraged to mentor the principal, administrators, and teachers on the need to keep students records confidential, and educate all policy makers about the dangers of limiting students' privacy rights (ALA Guidelines 2). Running a course on digital citizenship and the acceptable use of interactive tools can safeguard students' privacy and confidentiality in the school library. Finally, encouraging parents to speak directly with their children about their reading choices can minimize the potential for challenges to library materials (Adams 1).

Oftentimes, parents guide and restrict their children's access to library materials. Adults seek to censor books based on their wish to protect presumably easily-influenced and vulnerable children from beliefs and realities that they do not agree with, that they do not want their children to adopt, or that they feel are harmful to their children (Saltman 11). Parents play a critical role in the process of aiding children as they make reading decisions, and are urged to facilitate this by helping children examine how family values relate to those expressed in books (Saltman 13). In the school library, librarians guide children in selecting books but do not restrict access and choices. The role of the librarians and teachers is to defend the freedom to read. Children's exposure to diverse beliefs and truths in books enhances their ability to think critically, make informed decisions, and develop personal value systems and empathetic relationships with others. Children's author and critic Dorothy Butler recommends that adults believe in children's ability to understand complex ideas. She emphasizes that the representation of concepts and opinions perceived to be "morally invaluable" does not endorse them but rather gives every young reader the freedom to express their own. According to Butler, "intolerance

of differing views in children's books easily leads to vigilante tactics, censorship and the suppression of the imagination” (Butler qtd. in Saltman 13). School libraries, and bookstores exist in a pluralistic society serving families and cultural and social groups with diverse values and beliefs, backgrounds, and child-rearing practices. This calls for diversity of viewpoints, values, and opinions in children's books (Saltman 12).

Public and school libraries recognize the right of others, including minors, to decide what they will read. Librarians offer access to a broad variety of informational and recreational reading materials to accommodate the diverse interests and needs of youth (Saltman 13). Developing deep understanding of the implications of censorship, and judicial knowledge regarding federal court rulings that affect censorship in the school library can better prepare school librarians to defend students’ First Amendment rights to receive information. In their study, Lukenbill and Lukenbill examined the level of judicial knowledge that a sample of Texas school librarians held regarding basic federal court rulings and the effects that these rulings have on censorship of school library media materials. In addition, the study assessed how the librarians perceive their likely behaviors regarding their obligation to follow the law, and act to protect and facilitate students’ First Amendment rights to receive information. The findings revealed that generally, school librarians appear to understand the need to resist censorship of library materials in their charge, and that in many cases they are willing to explain to administrators and boards members some of the legal issues involved in removing challenged materials from collections. What is lacking, however, is a deep awareness and fundamental knowledge of court interpretations of constitutional law, how these rulings affect school library collections, issues surrounding freedom of speech rights, and

students' legal rights to receive information. The study concludes that there is a need for a new curriculum, or at least a readjustment of existent ones, and improved instructional approaches to correct some of the inadequacies of the legal knowledge of school librarians and their awareness of their constitutional obligations to protect students' access to information and intellectual freedom rights (Lukenbill and Lukenbill 22-38).

Defending students' intellectual freedom rights is manifested in the intentional effort to create a culture of intellectual freedom in schools. Creating a culture of intellectual freedom in schools goes beyond dealing with filtering issues and talking to school administrators about students' First Amendment rights to receive information. Allowing children and youth free access to diverse ideas, presented in multiple formats, prompts them to grow, and challenges them to figure out what the world is about, as well as their place in it. It instills a willingness to make the world a better place. "By ensuring access to a wide variety of materials, we can indeed nurture intellectual freedom: the freedom to roam wherever our minds may lead" (Bringelson 50). Creating a culture of intellectual freedom in schools is a lifelong effort to instill, promote, and act on the democratic values of society to protect basic human rights and freedoms.

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