The school library has become a place of conflict, pitting students' desire to investigate literature against the desire of some administrators to control educational materials and
the desire of some outside the schools to monitor what happens in the classroom and what appears on the library shelves. The desire to censor public school libraries arises from many factors, including the increase in reading by Americans in recent decades, the greater numbers of students in school, and changes in the manner in which literature is taught. These influences have created a climate in which parents, other citizens and special interest groups have become only too willing to look over the shoulders of school librarians and literature teachers (Burress 1989). In some situations, the censorship battle has ended up in court, with inconclusive results.

**PICO AND THE RIGHT TO RECEIVE INFORMATION**

In 1982 the United States Supreme Court handed down its decision in Island Trees Union Free School District No. 26 versus Pico, a case in which students and parents challenged a school board's removal of certain books from a school library. The board withdrew novels and texts which members considered to be "anti-American, anti-Christian, anti-Semitic, and just plain filthy." A plurality of the Court set limits on a school board's ability to remove books from school libraries. To the plurality, removal was only permissible if books were determined to be "educationally unsuitable." The justices said book elimination would be invalid if partisan political motivation were a decisive factor in the action. (Terry 1986).

Justice Brennan's plurality opinion in the Pico case took its inspiration for the notion of a right to receive information from the case of Right to Read Defense Committee versus School Committee, a 1978 decision from the Boston federal district court. In his opinion in the Right to Read case, Judge Joseph Tauro described the school library as a place in which the student could discover and explore ideas. "What is at stake here," Tauro wrote, "is the right to read and to be exposed to controversial thoughts and language..." (Marek 1987).

The right to receive information can apparently only be exercised by parents for their own children. In McKamey versus Mt. Diablo Unified School District (1983), a California Superior Court judge refused to allow a group of local residents who objected to the presence of Ms. magazine in the school library to block other students' access to the periodical. Judge David A. Dolgin held that while a parent could bar his or her own child from reading the magazine, that parent could not exercise such a right on behalf of all students (NCAC 1985).

**CENSORSHIP OR CURRICULUM MODIFICATION?**

Traditionally, the schools' efforts to control the content of their libraries has reflected a desire to keep certain information away from students until they are deemed mature
enough to deal with it. For instance, sixth graders may not have access to materials which are readily available to tenth graders. Library selections for children reflect this pattern. Child psychologists have long recommended that appropriate literature for young children should be focused on simple concepts portrayed in an idealized manner. Even books for adolescents are on a sophistication level below that of adult fare.

In the wake of the Pico decision, school boards should develop policy statements on book procurement. One such statement should prescribe a set of administrative procedures, each appropriate to the grade levels of the school buildings in which that policy is to be implemented. Another policy should accommodate objections from the community, spanning the range of possibilities from a citizen's statement that he or she does not like a certain book to a set of reasons why certain books should be removed from student access. In addition, the policy should provide for a neutral review committee which would examine, discuss, and make recommendations regarding library selections (O'Reilly 1984).

WHO ARE THE CENSORS AND WHO ARE THEIR OPPONENTS?

Those who lead library censorship campaigns come from both right- and left-wing organizations. Fundamentalists may dislike the open discussion of such issues as abortion in news magazines, feminists may challenge outdated female stereotypes found in certain books, and African-American groups may object to the portrayal of members of their race in such works as Huckleberry Finn or the Black Sambo stories. Censors tend to fall into three groups: (1) parents who hear about or see material that troubles them; (2) community members or parents who react to a book without having read it; and (3) local, state or national organizations, some of which have specific lists of titles which they consider objectionable.

On the other side are such groups as the American Library Association (ALA) and the National Council of Teachers of English (NCTE). Both groups publish materials which are designed to help teachers and school librarians resist efforts to keep particular literary works out of the hands of students. These sources suggest that steps to protect such materials should be taken before the works are challenged, and that schools should have written book selection and grievance policies (Marek 1987).

The library censorship cases of tomorrow are affected by political choices being made today. Those now being nominated to serve on the nation's courts will be shaping the future meaning of the right to read and the right to receive information. Because of modern communication technologies, censorship cases are increasingly coming into public view. People interested in maintaining the freedom to read are showing their support for the librarians, publishers, and authors who have always been on the defensive against censorship (Abbott 1987). Moreover, recent bibliographic works cite long lists of books and articles that highlight the censorship issue, particularly as the
issue is played out in schools and school libraries (Hoffman 1989).

**NEW TEACHERS AND CENSORSHIP**

New teachers, who have probably not been specifically schooled in the issue of censorship, may feel that they do not know how to cope with the issue. When they begin their careers, teachers may face pressure from colleagues to avoid controversial text selections, and this pressure may give rise to self-censorship. Teachers must learn to distinguish among wise advice (i.e., that a certain book is inappropriate for learning disabled ninth graders), advice that encourages self-censorship (that a certain book should be avoided because parents will not approve) and ambiguous advice which lies somewhere between self-censorship and recognition of community standards (Small 1987).

A good source of information on censorship questions is the school librarian, who knows more than anyone about what students read and like and what parents would not wish or will not allow their children to read. The librarian is likely to be aware of review sources and rationales which endorse the selection and use of frequently attacked literature.

Language arts teachers and school librarians can work together to make literature more fully available to students. Each can offer guidance and support for the other’s attempts to broaden student access to ideas through reading (Small 1987).

**REFERENCES**


Marek, Kate. "Schoolbook Censorship USA." June 1987. [ED 300 018]

Small, Robert C., Jr. "Preparing the New English Teacher to Deal with Censorship, or Will I Have to Annual Meeting of the National Council of Teachers of English, 1987, 16 p. [ED 289 172.]


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