Censorship of Print Materials in School and Youth Libraries
An Annotated Bibliography

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Introduction and Scope

The following bibliography covers the censorship of print materials in school libraries and media centers. The articles were published from 1981 to 2009 and encompass the major court cases regarding school library censorship, the power of school boards regarding library materials, protection of students’ right to read under the First Amendment, the various sources of challenges to materials, and attempts to preempt challenges through librarian self-censorship and selections. Also included are articles discussing proposed ideas and solutions to support both school librarians and students’ rights against unnecessary or unlawful censorship of print materials. Purposely omitted was the developing and emerging field of Internet censorship in schools, as this is a separate issue with additional problems and challenges to those covered here regarding print materials. Emphasis was placed on providing background information regarding major case law and the development of the modern viewpoint on censorship in schools from the early 1980’s as well as including current research and thinking on the topic. All articles were published in the United States.

Description

School librarians face great psychological, social, professional, and emotional pressure when faced with a challenge to an item they selected (Coley, 2002). In addition to being subject to the same guidelines published by the American Library Association regarding the conduct of librarians and the censorship of materials that govern public, specialty, and academic librarians, K-12 school library media specialists are also subject to the supervision and direction of the state curriculum guidelines, school board, school administration, and parent or community action groups. The urge from these interest groups to protect students from possibly objectionable material is sometimes in direct opposition to students’ first amendment rights. School librarians must often navigate a very narrow path between censorship and selection and between following the law by protecting the students’ right to read and appeasing the governing bodies of the school.

Summary of Findings
Censorship of learning materials for school age children is of long standing. However, the late 70’s and early 80’s saw a surge in attempts to censor school library materials by community action groups, parents, and school boards in favor of local codes of thought (Pray, 1982). From these actions, the evolution of modern thought regarding censorship of school materials and the rights of students developed through litigation, including the only Supreme Court case on the matter, Board of Education, Island Trees Union Free School District No. 26 vs. Pico (Kaimat, 1983).

Prior to Pico, school boards and state educational bodies had almost exclusive rights to censor any materials deemed inappropriate or offensive to the local community and to indoctrinate students according to local mores and values (Niccolai, 1981). However, several lower court cases leading up to the Pico case addressed the issue of infringement of students’ First Amendment rights when removing books from school libraries. Unfortunately, a firm consensus could not be reached and the Pico case continued through the appeals process. Even the Supreme Court issued only a plurality opinion in the Pico case, with all seven justices writing opinions leaving great room for interpretation of the decision. It did not address acquisition of materials, but limited the right of school boards to remove materials already acquired to inculcate its community values (Dunn, 1984).

The Pico decision sparked new thought and awareness regarding the need to provide free access to materials, even in school libraries. In 1988, Hopkins (1990) spearheaded a study of Wisconsin schools that identified five factors influencing the outcome of challenges to materials, which led to a national study (1991) revealing the prevalence of challenges in secondary school libraries and emerging methods to support library media specialists in reaching positive outcomes for those challenges.

The Pico case and the Hopkins studies have formed the basis for further research in the last twenty years regarding censorship in school libraries. The focus has been in three major areas: 1) the sources of challenges as well as the factors influencing the outcomes of those challenges, 2) the knowledge and preparation of school librarians to deal with challenges and the development of a network of resources and support for
those librarians, and 3) awareness of methods by which librarians attempt to circumvent and avoid challenges.

Challenges are issued from various sources both within the school and from the outside school community. The outcomes of challenges are often influenced by the source of the challenge to begin with. Challenges from school principals are more likely to result in removal of materials (Hopkins, 1995). Challenges from parents and communities often result in retention of the materials, relocation of materials, or the provision of other options for students to read instead of the challenged materials (Coley, 2002). Outcomes also depend on the type of schools involved. Public schools are subject to the First Amendment. However, private schools are subject only to the terms of their governing bodies, leading to censorship according to religious, moral, and other belief systems not allowed by public institutions (Franklin 2008). Overall, strong district materials selection and retention policies (Lent, 2008), external support from professional associations and other groups working against censorship, and professional development for school librarians to handle challenges (Hopkins, 1991) positively influence the outcome of challenges. Additionally, Kupfer (2009) recently suggested that challenges should be met with literary expertise and attempts to educate the public regarding reading offensive materials in context and the intrinsic value of the material beyond the controversial topic.

As research has developed on the unique problems of censorship in school libraries, focus has fallen on the education of school librarians in their legal and ethical responsibilities regarding censorship (Lukenbill, et. al, 2007) as well as methods to support school librarians during challenges (Lent, 2008). Lukenbill, et. al, (2007) found that school librarians often had a general understanding of Pico and other legal cases but had limited knowledge of constitutional law and the rights of various interest groups regarding censorship including students, parents, teachers, administrators, and communities. Hopkins (1998) also identified a lack of knowledge for school librarians regarding the resources and support available to assist with materials challenges. Lent (2008) suggested the formation of community wide forums to raise awareness as well as to educate both librarians and communities on censorship. Hopkins (1998) suggests
more pre-service and professional development for school librarians regarding the specific issues of censorship in schools versus general education regarding censorship on a larger scale in public and specialty libraries. Clearly, more emphasis on the education and preparation of school librarians is needed to promote a readiness to deal with challenges as well as knowledge of resources and support to assist librarians during challenges.

Additional research has focused on the preemptive actions librarians take in an attempt to avoid challenges to materials. Such strategies include, not selecting controversial materials during the acquisition process (Coley, 2002) and moving controversial books to different areas of the library, the reference section, or restricted sections (Curry, 2001). This type of self-censorship tends to be more widespread in smaller, more conservative communities including rural and highly religious areas (Coley, 2002). However, such actions tend to be futile as the range of materials considered controversial or offensive continues to expand as youth literature continues to address more and more forthright issues (Shrader, 1996). People will always find something to challenge regardless of efforts to prevent challenges. In addition, self-censorship through non-selection of controversial materials or restriction of those materials is also an infringement on First Amendment rights (Huston, 2003), though no legislation or case law exists on this aspect of censorship as yet. Again, education of librarians on avoiding self-censorship and the differences between censorship and selection is required to protect students’ right to read (Coley, 2002).

The topic of censorship of materials in school libraries continues to expand and change as the content of youth literature, the body of research regarding censorship, and the modern viewpoint regarding students’ First Amendment rights continues to develop as new challenges are met. The basis for these thoughts and challenges still lies in the Pico case and the Hopkins research of the 1980s, but theories for dealing with challenges have continued to expand over the past twenty years. The consensus seems to be that education is the answer to protecting students from censorship. Pre-service education regarding the legal, constitutional, and ethical responsibilities of school librarians to prepare them to meet challenges with well-supported arguments is key.
Additionally, education of school librarians regarding self-censorship, the differences between selection and censorship, and the resources available to support them during challenges is paramount. Emerging research also suggests that education of the public regarding censorship is also important in decreasing challenges and allowing access to materials for students. The issue of censorship of school materials has no concrete answer or decision, but many studies and methods exist to curb the negative effects of censorship.

Bibliography

Entry 1:

**Abstract:** The purpose of this study was to determine the potential of measuring the holdings of a school library young adult book collections and indications of self-censorship that might be practiced by the school library media specialist. The method employed, analysis of title ownership through examination of the school's OPAC, was an attempt to move away from questionnaires and interviews which might not allow for an objective description of selection decisions and acquisition practices.

A pool of recent, potentially controversial young adult books that had also received supporting reviews, awards, or recommendations for inclusion on reading lists was established. A small, random sample of high schools in Texas that are part of the state's online union catalog system was determined. Specific titles were searched in each school's OPAC to determine ownership. Based on one factor, not owning at least 50 percent of the controversial titles in the pool tested, the researcher concludes that over 80 percent of the schools in the study show signs that self-censorship has occurred during the collection development process.

The researcher acknowledges the limitations of the study and suggests other factors that should be taken into account before conclusive judgment can be made that deliberate self-censorship is widely practiced. An agenda for further research and study on censorship issues is outlined.

**Annotation:** Provides a baseline for research regarding self-censorship by school librarians to avoid challenges to controversial materials. Scope is limited to a small sample size in Texas high schools, but method is unique in that it eliminates biased questionnaires and relies on OPAC records. Examines censorship vs. selection. Conclusions show self-censorship does occur and smaller school libraries tend to be more conservative in their holdings than larger.
Database: Library Literature and Information Science (Dialog)

Method of Searching: Keyword and Controlled Vocabulary (the search began as a keyword search, after which I used controlled vocabulary to narrow the results and ensure that the articles were written after the major legislation on this topic).

Search String: s (censor? OR ban?) and school()librar? s s1 and PY>1999

Entry 2:


Abstract: This research project was sparked by the statements of public librarians regarding moving books to avoid challenges and investigates two phenomena of censorship: 1) “An investigation of the ‘relocation’ of controversial materials for older children/young adults to the adult or reference area, including the extent of this practice and identification of the types of controversial materials most likely to be moved” and 2) “An investigation of the most common reasons given when older children/young adult materials are challenged.” (Curry, 2001, p. 28).

Annotation: Discusses research studies regarding both reasons behind materials challenges and the use of material relocation as a response to those challenges. Includes information regarding the relocation of materials to satisfy challenges in both school and public libraries while still maintaining free access to materials within the library. Study sample limited to 60 British Columbia libraries.

Database: ERIC (Dialog)

Method of Searching: Keyword and Controlled Vocabulary (the search began as a keyword search, after which I used controlled vocabulary to narrow the results and ensure that the articles were written after the major legislation on this topic).

Search String: s (censor? OR ban?) and school()librar? s s1 and PY>1999

Entry 3:


Abstract: After examining earlier school library censorship cases, the author analyzes
the litigation and ten separate opinions in *Board of Education v Pico*, the celebrated library book removal case. Based upon these court opinions and the views of numerous commentators, the author offers suggestions for resolving future controversies involving book removals and preselection censorship.

**Annotation:** Discusses the background, significance, limitations, and conclusions of the first Supreme Court case to confront the issue of removal of materials from school libraries by school boards in 1982. Examines the issue of students’ first amendment rights, the responsibilities of librarians, and possibilities for future cases. This case represents the development of modern thinking regarding censorship in school libraries.

**Database:** Web of Knowledge

**Method of Searching:** Keyword and Controlled Vocabulary (the search began as a keyword search, after which I used controlled vocabulary to narrow the results and ensure that the articles were written after the major legislation on this topic).

**Search String:** censor* and school librar*
  Limit to United States and 1980-Present

**Entry 4:**


**Abstract:** Materials challenges and censorship occur often in public and private educational settings. Private schools and their library media centers are not subject to the First Amendment but research reported in this article examines the state of challenges to materials held in private schools media centers in the southeast United States as a way to gauge the frequency and outcomes of materials challenges in these institutions. The study builds on previous research of challenges in public schools as a framework to examine the types of challenges to materials in private college preparatory school libraries in the southeast, the outcomes of the challenges, and the factors that influenced the outcome of the challenges. The author reports the results of a quantitative study wherein data were collected via a four part electronic survey with items that pertained to media center materials challenges that occurred during the 2002–03, 2003–04, and 2004–05 school years. The article discusses the state of challenges to private college preparatory schools in light of previously identified challenge outcome factors and includes suggestions for future inquiry in the topic area.

**Annotation:** Represents the issue of removal of materials in private schools and institutions, which are not subject to the same first amendment guidance as public
schools. Discusses private school challenges using previous comprehensive research by Dianne McAfee Hopkins in public schools as a basis for comparison. Suggests further study opportunities regarding the differences in the basis for challenges in private—sometimes religious—institutions and the need for selection criteria differing from that in public schools.

**Database:** Library Literature and Information Science (Dialog)

**Method of Searching:** Keyword and Controlled Vocabulary (the search began as a keyword search, after which I used controlled vocabulary to narrow the results and ensure that the articles were written after the major legislation on my topic).

**Search String:** s (censor? OR ban?) and school()librar? s s1 and PY>1999

**Entry 5:**


**Abstract:** This article reports the findings of an exploratory intellectual freedom study conducted in spring 1988 in Wisconsin. Challenges to materials in Wisconsin’s middle, junior, and senior high school library media centers are examined based on a conceptual, research-based framework that is presented. The article reports general findings and provides an initial discussion of factors that influenced the outcome of reported challenges.

**Annotation:** Provides a unique framework of five factors influencing challenges to materials in school libraries based on a study of these challenges in Wisconsin secondary schools. Presents both qualitative and quantitative data and analysis of the study findings. Limited sample, but provides excellent basis for expanded study. Recommends frequent updates to library policies, focus on pre-service and professional development to educate and prepare librarians for challenges, and use of external support to create positive outcomes to materials challenges.

**Database:** Library Literature and Information Science Full Text (WilsonWeb)

**Method of Searching:** Author

**Search String:** Hopkins, Dianne McAfee

**Entry 6:**

Results of a national study. *Youth Services in Libraries, 4*(2), 131-140.

**Abstract:** In May 1989, with a grant from the U.S. Department of Education under the Library Research and Demonstration Program, a national study was designed to examine factors that influence the outcome of library media center challenges at the secondary public school level. Additional funding was received from Encyclopaedia Britannica, Inc. The study, which was conducted during the 1989-90 school year, was divided into two phases. Phase one was the identification of schools that experience complaints during the school years 1986-87, 1987-88 and 1988-89. Phase two included the distribution of a questionnaire to schools, through school library media specialists, focusing on the complaint process relating to library media materials.

This article provides a status report on challenges to secondary school library materials (middle, junior, and senior high school levels) in the United States. In addition, the article provides a descriptive comparison of secondary-level schools for which one or more challenges were reported with secondary-level schools for which no challenges were reported during 1986-89, the period examined by the study.

For purposes of the study, a complaint is defined as an oral or written challenge questioning the presence or appropriateness of library media material. It may be initiated by any member of the school staff as well as persons outside the school.

**Annotation:** Provides national scope for challenges to materials in secondary schools. Shows that approximately one-third of libraries sampled experienced a challenge to materials during the study period and the factors that influence these challenges including location, selection policies, education level, etc. Discusses the importance of district level materials selection policies in preventing challenges and creating positive outcomes to challenges as well as the importance of education for library media specialists in issues intellectual freedom.

**Database:** N/A

**Method of Searching:** Footnote Chasing

**Search String:** Referenced in:

**Entry 7:**

**Abstract:** Challenges to school library materials initiated by principals in public
middle, junior, and senior high school libraries in the United States are examined. The article provides a discussion of research and professional practice literature emphasizing the leadership of the principal; the role of the principal in school library program development; and the principal and school library censorship. The study revealed that challenges initiated by principals are likely to result in removal or restriction, and differ in several ways from challenges initiated by others. Challenges resulting in restriction may be viewed as a "victory" of sorts for both the principal and the librarian.

**Annotation:** Examines the unique role of the school principal in the success of school libraries as well as the principal’s influence and role in materials challenges. Shows that challenges by principals are more likely to result in removal of materials than challenges from other sources. Provides a basis for further study of the differences in support for librarians and materials when the challenge is initiated by a principal as well as the effects of relationships among staff members in conjunction with the outcome of challenges.

**Database:** Library Literature and Information Science Full Text (WilsonWeb)

**Method of Searching:** Keyword

**Search String:** censor* and school librar*

**Entry 8:**


**Abstract:** (Excerpt from the Introduction) The value of support during challenges to library media materials has been touted for years within the profession through its literature and its professional associations. Support groups such as state intellectual freedom committees and supportive statements such as the Library Bill of Rights (American Library Association 1996, 3–4) are examples of resources that are available to library media specialists who might experience challenges to the presence or appropriateness of library media center materials.

Given the value of support during a challenge, several questions emerge that guide further study:

- Why do many library media specialists choose to deal with a challenge to school library materials without professional support?
- What contributions can support make to the library media specialist during the challenge process?
• What support systems are likely to be most beneficial to the school library media specialist during the challenge? Why?
• What is known in support research, generally, that can assist in understanding responses of the school library media specialist to a material challenge?

**Annotation:** Examines the importance of social and professional support of school libraries during media challenges. Shows an absence of support or failure to seek support in the majority of challenges as well as the influence of support on the outcomes of challenges and the mental and physical toll challenges take on librarians. Formulates tenets for developing consistent avenues of support for school librarians.

**Database:** Library Literature and Information Science Full Text (WilsonWeb)

**Method of Searching:** Author

**String:** Hopkins, Dianne McAfee

**Entry 9:**


**Abstract:** No abstract was provided. However, the following summary was included with the article: Printed and bound, it threatens the youngest, most impressionable minds with the lure of new ideas not espoused by parents and other authority figures. ... This Note makes the case for new standards to prevent "silent censorship" in school library selection policies. ... Ancient and medieval cultures separated children from the adult world only until the age of seven. ... Censorship is particularly detrimental to the school library as well because "school libraries are, after all, the only place in the school where students are generally free to read books and consider ideas of their own choosing. ... In examining school library practices to determine whether censorship in selection is taking place, it is important to note that a librarian does not act "unethically" when he or she consults "community standards" or uses professional judgment in evaluating a work, particularly when children are the intended audience. ... Before Pico, courts had grappled with whether a distinction existed between selection and removal. ... The Library Bill of Rights or the School Library Bill of Rights may provide some protection when approved as part of the selection policy by the school board.

**Annotation:** Discusses the development of “silent censorship” in response to the failure of the Pico case and other judicial action to address censorship in selection of materials rather than only removal. Provides a thorough overview of the history of censorship through selection in order to avoid challenges with reference to students’ first
amendment rights and legislative and judicial framework. Suggests methods to avoid censorship through selection and legal recourse for those seeking to eliminate silent censorship.

**Database:** Google Scholar and LexisNexis Academic Universe

**Method of Searching:** Citation Search on Google Scholar from the Pray, L. article found this article. Then I did a Controlled Vocabulary Search on LexisNexis to find the full text.

**Search String:** Google Scholar: Citation Search from: Pray, L. (1982). What are the limits to a school board’s authority to remove books from school library shelves? *University of Wisconsin Law Review*, 417-471.
LexisNexis: Selected Legal section and searched “silent censorship” and author “Huston”

**Entry 10:**


**Abstract:** (Excerpt from Introduction) This note attempts to analyze the asserted state indoctrinative interest in relation to the underlying social interests embodied in the first amendment. Part I examines the plurality's opinion in Pico and argues that the opinion's confusion stems from its uncritical acceptance of the validity of a very broad interest in indoctrination and from its willingness to juxtapose that interest and a supposedly unrelated student first amendment right. That approach gave rise to a need for limiting in some way the areas where the state interest applied, but the shape of those limits could not be derived from the student right as it was stated in the opinion. Part II examines the relationship between the first amendment and the scope of the state's legitimate indoctrinative interests. It argues that, at a minimum, the constitutional ideal of citizen self-government precludes recognizing a broad state indoctrinative interest in using education to instill in children whatever values might be chosen by the local community according to majoritarian preferences. While the ideal does legitimize certain indoctrinative goals, it also clearly demonstrates the need for limits on the state. Part III argues that the reasoning derived from the self-government principle, while not providing direct guidance for a court to use in policing state indoctrination, nevertheless does explain the Supreme Court's prior treatment of state indoctrinative interests—a treatment that creates a pattern that is judicially useable and that approximates the self-government principle's distinction between legitimate and
illegitimate indoctrination. Part IV shows that Justice Blackmun, in his Ptco
concurrence, adopted an approach consistent with this pattern. Justice Blackmun's
analysis properly directs inquiry away from an overly individualistic view of the first
amendment in the schools and towards the more useful instrumental view.

**Annotation:** Provides a thorough overview of and insight into the major cases of the
late 70s and early 80s that provided the foundation of modern thinking regarding
student first amendment rights and removal of materials by school boards in an attempt
to indoctrinate students into local community mores and values. Discusses the rights of
students, teachers, and parents as well as the extent of the state’s indoctrinative
education.

**Database:** JSTOR

**Method of Searching:** Keyword

**Search String:** censor* and school librar*

**Entry 11:**

*Library Philosophy and Practice,* 1-12.

**Abstract:** (Excerpt from Conclusion) For almost a century, detractors have argued that
The Merchant is burdened with religious prejudice. They try to banish it from schools
and school libraries. Most educators who examine the play know Shylock is not a sign
of obloquy against Jews. Defenders have been urged defend the play through a
Constitutional right to read. Commentators of literature are not cited on parity with the
experts on legal discourse. The high school teacher who teaches The Merchant, and the
school librarian who keeps it on the shelf, can use literary expertise with legal authority
to fully defend the selection of the play. When a web site collection of multiple assets is
built, then legal and literary judgment will together answer the wrath of the censors.

**Annotation:** Provides a unique framework for librarians to counteract challenges to
materials through the use of literary expertise and discussion of the value of materials
beyond the objectionable content (i.e., racist terms) and reading in context. Discussion
is limited to anti-Semitism in Shakespeare’s The Merchant of Venice, but the
conclusions are expandable to other works.

**Database:** Library Literature and Information Science (Dialog)

**Method of Searching:** Keyword and Controlled Vocabulary (the search began as a
keyword search, after which I used controlled vocabulary to narrow the results and ensure that the articles were written after the major legislation on this topic).

**Search String:** s (censor? OR ban?) and school(j)librar?  
  s s1 and PY>1999

**Entry 12:**


**Abstract:** ReLeah Cossett Lent provides practical advice for ensuring that books are kept on shelves and in classrooms for students to read. She outlines steps for creating professional learning communities that engage with censorship issues and prepare schools to deal with book challenges in thoughtful, supportive ways.

**Annotation:** Offers a unique viewpoint on the knowledge of teachers and librarians in regard to materials challenges and the right of administrators and school boards to remove those materials based on parent complaints. Suggests methods to educate professionals regarding censorship and create policies for review of challenged materials based on her experience with poorly managed challenges. Limited scope, but expandable conclusions.

**Database:** ERIC (Dialog)

**Method of Searching:** Keyword and Controlled Vocabulary (the search began as a keyword search, after which I used controlled vocabulary to narrow the results and ensure that the articles were written after the major legislation on my topic).

**Search String:** s (censor? OR ban?) and school(j)librar?  
  s s1 and PY>1999

**Entry 13:**


**Abstract:** Censorship of school library collections has risen significantly in the last few decades, and such attacks are increasing. American courts have ruled that students in schools have First Amendment rights and some degree of freedom of speech. Courts also have ruled that students have the right to information and to learn and discuss issues of importance within the context of their schools and libraries. This study sought
to determine the knowledge levels of a sample of school librarians concerning what they know about and how they support important court rulings that affect students' First Amendment rights. The study also sought to determine predictive behaviors of these librarians in protecting students' First Amendment rights. Basically the study found that the level of knowledge concerning legal rulings is low, but that school librarians in principle support students' rights to information, and that they are willing to advocate for those rights within the confines of their positions. Data also revealed that certain personal and demographic characteristics determine predictive behaviors. The study concludes with suggestions for redefining school librarianship education, emphasizing school library media specialists' professional responsibility to understand freedom of speech issues, laws, and court rulings.

Annotation: Discusses recent developments in materials challenges due to national security issues, the US PATRIOT Act, and Internet publishing of school library catalogs. Also explores the knowledge of school librarians regarding intellectual freedom and materials challenges. Smaller sample and subjective questionnaire. Suggests improvements in librarian knowledge regarding constitutional law and censorship case law.

Database: Library Literature and Information Science (Dialog)

Method of Searching: Keyword and Controlled Vocabulary

Search String: s (censor? OR ban?) and school()librar? s s1 and PY>1999

Entry 14:


Abstract: This article discusses several court cases regarding the right of school boards to exercise power of curricula and school library resources vs. the right of students under the First Amendment to read and to know. The article discusses the differing court opinions and the challenges involved in balancing the rights and duties of the school board, students, and parents.

Annotation: Thorough overview of the lower court cases and constitutional interpretations prior to the Pico Supreme Court case that formed the foundations of modern thought regarding students' right to read under the first amendment, the limits of school board authority to challenge and remove materials from school libraries, and censorship through selection. Provides a basis for study of case law regarding school library censorship and the rights and responsibility of the various groups involved.
Database: Web of Knowledge

Method of Keyword: Keyword and Controlled Vocabulary

Search String: censor* and school librar*

limited to United States and 1980-Present

Entry 15:


Abstract: No abstract was provided. However, the law journal provided the following summary: For twenty years, Board of Education v. Pico (Pico) stood as the Supreme Court's leading pronouncement upon and against censorship in public libraries. ... This curricular vs. extracurricular battle for the heart and soul of the public school library and librarian is a problem as old as the school library itself. ... Considering Internet filtering as a case in point, the article ultimately suggests that the curricular image needlessly jeopardizes the intellectual freedom of both students and school librarians, recognized in Pico, and that to preserve that freedom - the remaining pieces of Pico - the librarians must preserve a distinction between the curricular and extracurricular capacities of the public school library. ... To support the assertion that the CIPA implicated a First Amendment right of patrons to receive information and ideas in the public library, Breyer cited two sources: (1) parts of the plurality opinion, such as Rehnquist's discussion of the public library functions to inform and enlighten the public; and (2) Rehnquist's dissent in Pico, "describing public libraries as places "designed for freewheeling inquiry. ... With the emergence of the Tinker-Hazelwood dichotomy after 1988, Tinker preserved Pico by analogy, and the lower courts set the school library apart from the classroom in the fashion of the extracurricular-curricular distinction.

Annotation: Offers a modern look at the implications of the Pico Supreme Court case as the foundation of censorship case law for the past 20 years. Provides a look at the limitations and strengths of the decision in relation to various developments in thought and technology since the case was decided. Refers to modern legal cases and the specific need to discourage restriction of materials based on the school’s curricular prerogatives that Pico allowed.

Database: Google Scholar and LexisNexis Academic Universe

Method of Searching: Keyword on Google Scholar. Then Controlled Vocabulary to find the full text on LexisNexis.

Search String: Google Scholar: censor and school library
Entry 16:


**Abstract:** No abstract was provided. However, the law journal provided the following summary: Interest in library book removal has increased recently as citizen groups seek to influence the content of curriculum and materials in school libraries. ... Book removal guidelines should contain four ingredients: first, clear and specific criteria for choosing which books are no longer appropriate for school library shelves (these standards may be based on administrative efficiency or the content of the material); second, composition of the decision making body -- who will decide what books are inappropriate for school library circulation; third, a detailed outline of the procedural steps necessary to remove a book; and fourth, an appeal process. ... In other words, is there a first amendment right at stake in school library book removals, or is the school board's action one of unreviewable discretion? Brennan's response to this question initially recognized a school board's broad discretion to manage school affairs. ... Therefore, although the plurality recognized the school board's absolute discretion to prescribe the content of the curriculum and the school's authority to inculcate community values in the classroom, the opinion found that the board's discretion to remove library books is limited by the students' first amendment right of access to ideas and information.

**Annotation:** Discusses initial reaction and thinking regarding the Pico Supreme Court Case as well as the heightened activity of community action groups to influence school library materials in the early 80's. Important due to the foundation it provides for modern thought on censorship of school materials as well as the concrete guidelines is determines for the challenge and removal of books that provided the baseline for further study in the field.

**Database:** Google Scholar and LexisNexis Academic Universe

**Method of Searching:** Keyword on Google Scholar. Then Controlled Vocabulary to find the full text on LexisNexis.

**Search String:** Google Scholar: censor and school library
Lexis Nexis legal section: Limits to School Board with title Wisconsin Law Review and Author Pray

Entry 17:

Abstract: (Excerpt from the Introduction) However, what I am arguing in this article is that successful self-censorship and related practices are mostly an illusion, and that challenges to materials in school library collections are in the long run more or less inevitable. Moreover, these censorproofing practices represent a perhaps dangerous illusion because they give library staff a false sense of security and serenity. The principal reason why these practices are illusory is simple: all of them require school librarians to be prophets and clairvoyants, to be able both to predict the future about censorial targets and to read the minds of would-be censors. But even if professional education or ingenious recruitment could produce staff with these supernatural qualifications, it would still be futile: given the passage of enough time, every school library collection is eventually vulnerable to criticism and challenge. Nilsen and Donelson (1993) made this point in their Literature for Today’s Young Adults, arguing that any work is potentially censorable by someone, someplace, sometime, for some reason. Nothing is permanently safe from censorship, not even books most teachers and librarians would regard as far removed from censorial eyes—not Hamlet or Julius Caesar or Silas Marner or Treasure Island, or anything else. (p. 505)

Annotation: Reveals the misguided attempts of many library professionals to use self-censorship in an attempt to censorproof their libraries and avoid challenges to materials. Discusses the futility of these acts as well as the first amendment issues regarding censorproofing. Offers methods of self-censorship of which librarians should be aware as well as alternatives to these methods.

Database: Library Literature and Information Science Full Text (WilsonWeb)

Method of Searching: Keyword

Search String: censor* and school librar*

Conclusion:
While I had prior knowledge of annotated bibliographies and their uses before this class and this project, I learned a great deal about censorship and the unique challenges that school librarians face as opposed to public or specialty librarians in preventing censorship and protecting the rights of their patron population. Because school librarians deal exclusively with children, there are a greater number of challenges and attempts to censor than in regular library work due to the general need of the public to protect children from any controversial or offensive materials. There
are also additional sources of authority that must be satisfied when responding to censorship and challenges. I was surprised that several researchers found that many school librarians had little or no knowledge of sources of support available to them during challenges. I was not as surprised that school librarians had little in-depth knowledge of the case law or constitutional laws that define the issues of censorship in schools or that they were largely unable to offer extensive explanations on the topic prior to having dealt with a challenge. However, I am glad that I chose this topic, as I am now more aware of the pitfalls of self-censorship, the avenues available for seeking assistance with censorship, and the basis upon which current thought regarding school censorship was founded.

In the end, this project opened my eyes to an area of library science that is in need of additional educational resources for pre-service librarians such as myself. In my future career, I intend to work with youth and/or school libraries and will most likely be subject to these sorts of challenges and disputes. I hope that my research in this area will help me to maintain an awareness of these unique issues and encourage me to continue professional development in preparation to meet these challenges.