

Should our education be influenced by ideologies and perceptions that we do profess? Until much of the twentieth century, debates regarding what students “ought” to be taught actively generated a biased and unidimensional public school education. Martin Luther King once remarked that “the function of education is to teach one to think intensively and to think critically.”¹ But, in the country famed for its individual freedom, bestowed by the first amendment, students’ potential to challenge preconceptions and thoughtfully reason was severely restricted through teachings initially rooted in a basis of religion. Only after a series of cases appeared in the hands of our court of last resort did we, as a country, alter our attitude towards education – one that promoted a sense of impartiality and academic freedom.

Ratified in 1791 as a part of the bill of rights, the first amendment prohibits any laws that limit basic freedoms in speech, assembly, religion, press censorship, and government petition.² The first amendment is a crucial element granting students the freedom to choose what they believe in, participate in, and, fundamentally, the subjects they desire to learn. However, students’ educational goals were often in a skirmish with predetermined ideologies and religions, including many that students and their families did not avow. One particular clause of this amendment, the establishment clause, denoted that the government cannot designate or prefer an official state religion or philosophy, nor require its citizens to engage in specific religious activities or profess religious beliefs.³ This clause would soon be referenced numerous times as the basis in an equitable yet multifaceted public school education that was not dependent upon the teachings of a single religion.

During the greater part of the nineteenth and early twentieth century, educational preferences were firmly rooted in the concept of America as a Christian patriotic nation.⁴ Direct recitations of bible verses or those with some semblance to “God” were fairly common and were the subject of an intense debate. One such discourse was playing out between a group of parents, including Steven Engel, and the Herricks Union Free School District in New York.⁵ The backlash was a result of the requirement of daily prayer with numerous references to “God,” including recitations such as “Almighty God, we acknowledge our dependence upon Thee,” and “we beg Thy blessings upon us.”⁶ While the prayer itself was optional, many students were

¹ Martin Luther, Jr. King, “The Purpose of Education,” The Martin Luther King, Jr., Research and Education Institute, February 28, 1947, <https://kinginstitute.stanford.edu/king-papers/documents/purpose-education>.

² “First Amendment,” History.com (A&E Television Networks, December 4, 2017), <https://www.history.com/topics/united-states-constitution/first-amendment>.

³ “Establishment Clause,” Legal Information Institute (Legal Information Institute), accessed September 22, 2021, https://www.law.cornell.edu/wex/establishment_clause.

⁴ Austin Cline, “A History of American Religion: 1600 - 2004,” Learn Religions, May 12, 2017, <https://www.learnreligions.com/history-of-american-religion-timeline-4079964>.

⁵ David Hudson, “Engel v. Vitale (1962),” Engel v. Vitale, 2009, <https://www.mtsu.edu/first-amendment/article/665/engel-v-vitale>.

⁶ Black, Hugo Lafayette, and Supreme Court Of The United States. U.S. Reports: *Engel v. Vitale*, 370 U.S. 421. 1961. Periodical. <https://www.loc.gov/item/usrep370421/>.

bullied and harassed by other students if they did not take part in it. After a rejection from the New York Court of Appeals, *Engel vs. Vitale* made its way to the Supreme Court. The justices ruled in favor of the students and parents, citing the prayer as a violation of the establishment clause. Under it, neither the United States nor its institutions such as public schools were allowed to impose a mandatory prayer claiming allegiance to a specific belief. Following the ruling in 1962, no public school can hold prayers regardless of their voluntary nature.

Beyond required prayers, censorship of specific education material also hampered the development of a diverse worldview for students of the twentieth century. One example was the showing of certain films in the classroom. While age restrictions on movie showings still exist to this day, they do not carry the same reasoning as back in the early 1950s. In 1952, Joseph Burstyn, a film distributor, filed an appeal when his recent short film release, *The Miracle*, was banned from showing in schools by the New York State Board of Regents (now known as the New York State Educational Department).⁷ The movie drew widespread appeal from the public due to its novel cinematography, but it was also the source of intense backlash from many Catholics who felt offended by its religiously loaded theme and irreverence to Catholicism. However, the Supreme Court remained firm in the historic decision of *Joseph Burstyn Inc. vs. Wilson*; students were no longer prohibited from viewing material that was subjectively deemed “sacrilegious” by a school board.⁸

Most infamously restricting was the ban on teaching modern biology, now known as evolutionary biology, in public schools until 1966. Originally ratified in the Fundamentalist religious fervor of the 1920s, the Arkansas statute forbade the teaching of evolution in any institution supported by public funds. Susan Epperson, a tenth-grade biology teacher, found herself in a legal dilemma following the adoption of a new curriculum, including the teaching of evolution, put forth by her high school.⁹ With support from numerous organizations and unions, such as the American Civil Liberties Union (ACLU) and National Education Association (NEA), she filed suit to test the law’s constitutionality. The lower court initially decided that the Arkansas statute was unconstitutional because it hindered academic freedom, but the Arkansas Supreme Court soon reversed that decision. When the case made its way to the United States Supreme Court, the Justices overturned the lower court's decision once again, citing the first and fourteenth amendments. At this point, it was clear that the Supreme Court agreed that governments must maintain religious neutrality, and this was echoed through the public school

⁷ “Joseph Burstyn, Inc. v. Wilson Et Al.,” Legal Information Institute (Legal Information Institute), accessed September 22, 2021, <https://www.law.cornell.edu/supremecourt/text/343/495>.

⁸ Clark, Tom Campbell, and Supreme Court Of The United States. U.S. Reports: *Joseph Burstyn, Inc. v. Wilson*, 343 U.S. 495. 1951. Periodical. <https://www.loc.gov/item/usrep343495/>.

⁹ Kristine Bowman, “Epperson v. Arkansas,” Epperson v. Arkansas, 2009, <https://www.mtsu.edu/first-amendment/article/265/epperson-v-arkansas>.

system by banning all curricula adhering to a particular religion such as creationism following the *Epperson vs. Arkansas* decision.¹⁰

The first amendment has been consistently referenced in support of the public school students' pursuit of academic freedom and quest for knowledge. Without a series of decisions such as *Engel vs. Vitale*, *Joseph Burstyn Inc. vs. Wilson*, and *Epperson vs. Arkansas*, that greatly expanded their rights, an impartial public school education would not have been possible. From these decisions alone, today, public school students from all backgrounds can seek solace in being exempt from mandatory prayers, viewing the films of their choice, and taking courses of their choice from an unbiased curriculum. Their freedom to learn what they choose has persevered.

¹⁰ Fortas, Abe, and Supreme Court Of The United States. U.S. Reports: *Epperson v. Arkansas*, 393 U.S. 97. 1968. Periodical. <https://www.loc.gov/item/usrep393097/>.