

Perception and Practice: The “Wall of Separation” in the Public School Classroom

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The concept of *separation of church and state* is first credited to Thomas Jefferson in 1802. Because the First Amendment stated Congress would make “no law respecting an establishment of religion, or prohibiting the free exercise thereof,” Jefferson declared that this built a *wall of separation between Church and State* (*The Writings of Thomas Jefferson*, 1907, pp. 281-282). Inaccurate interpretation of this concept has resulted in confusion and conflict in public education. Furthermore, in recent decades some have advocated what might be called the *naked public school* where the teaching about religion and the practice of religion in any form is excluded in the name of the Establishment clause of the First Amendment. Consequently, some in public education have enforced it so strictly that public schools have become religion-free zones (Haynes & Thomas, 2007).

The confusion that has surrounded this issue continues to produce misunderstanding among public school educators and various stakeholders including administrators, school board members, teachers, students, and also us as parents. What we believe or what we have been taught about what is permitted in public schools may be incorrect. To illustrate this, attached is a survey of 26 true/false statements, all dealing with the teaching or practice of religion in public schools. Take two minutes and mark whether you believe each statement to be true or false on the survey. The results of this survey, taken recently of education majors at Grove City College, may serve to inform the public as to the extent of this “wall of separation” in our public schools, and how informed/misinformed our citizens may be.

In December 2013 the 334 education majors at Grove City College were invited to take a similar survey electronically to assess their perceptions of what is and is not permitted in regards

to the teaching and practice of religion in public schools. To facilitate the survey process, students from my fall Methods of Teaching Modern Languages course went to most of the fall education courses to inform the students beforehand about the survey and to answer any questions. The education majors were reminded that Grove City College strives “to provide an excellent education which seeks to be thoroughly Christian and evangelical in character” (Inman, 2013, p. 7) and that their pre-service teacher training was preparing them to be “capable Christian leaders in the fields of teaching and learning” (Grove City College Department of Education, 2005, Mission). In addition, the Grove City College students were informed that the purpose of the survey was to identify teacher candidate perceptions of what is and is not permitted in regards to the teaching and practice of religion in public schools. Also, the students were instructed that for each item on the survey, they were to choose whether they thought the statement was True, Probably True, Probably False, or False and that they were not to do an internet search to find answers while taking the survey.

Out of the 205 students that took the survey 43 were seniors, 50 were juniors, 56 were sophomores, 55 were freshmen, and one was other (possibly a super-senior). Appendix A shows the correct answers for the 26 survey items as well as the results of the survey. One sees that for half of the survey items 50% or more of the students chose a definite response of True or False. For the other half of the survey items, however, 50% or more of the students were unsure of their responses, choosing a “Probably” answer or the incorrect answer or did not respond.

The survey consisted of three sections: curriculum and course content, teacher behavior/actions and dress, and student behavior/actions and dress. For the first nine survey items dealing with curriculum and course content, the majority of students only chose the correct answer of True or False for three of the items and provided unsure or incorrect answers or did

not respond for the remaining six items. Similarly, the majority of students only chose the correct answer of True or False for three of the eight items about teacher behavior/actions and dress.

The majority of students, however, did much better on the section dealing with student behavior/actions and dress, choosing the correct answer for six of the eight items. Students, therefore, appeared to understand most clearly what students are permitted or not permitted to do about students practicing their faith in the public schools.

Consequently, the survey showed that the teacher candidates misunderstood what is permissible in public education with regards to religion in areas such as curriculum and course content and the teachers' practice of faith. For all of the survey items at least 19% of the students chose the correct answer of True or False. As part of their teacher training in an Issues in Education course at Grove City College, education majors examine what is permissible for educators in public education to do about teaching religion concerning areas such as textbook content and religious holidays as well as teachers' and students' rights to exercise their faith. Typically seniors take this course during the semester that they are not student teaching. It was likely that part of that percentage that chose the correct answers, therefore, might be students that had the Issues course and had already studied about this topic. Likewise, it was understandable that the underclassmen, pre-service teacher candidates would not yet know the correct answers; rather, they would answer the survey items based on what they believed or had been taught during their K-12 education years.

This misunderstanding about the teaching and practice of religion has been pervasive in public education for several decades. Accordingly, in 1995 a coalition of 24 national educational and religious groups undertook the task of developing the document "Religious Liberty, Public

Education, and the Future of American Democracy.” Basing their interpretation of the separation of church and state in public education on court decisions, this document stated:

Public schools may not inculcate nor inhibit religion. They must be places where religion and religious conviction are treated with fairness and respect. Public schools uphold the First Amendment when they protect the religious liberty rights of students of all faiths or none. Schools demonstrate fairness when they ensure that the curriculum includes study about religion, where appropriate, as an important part of a complete education (First Amendment Center, n.d., Principle IV).

Many of these same organizations—including the Christian Legal Society, the National Education Association, the American Federation of Teachers, the American Association of School Administrators, the Association for Supervision and Curriculum Development, and the National School Boards Association—developed “Religion in the Public School Curriculum: Questions and Answers” in which they articulated the importance of the study of religion as part of a well-rounded public school education:

Because religion plays a significant role in history and society, study about religion is essential to understanding both the nation and the world. Omission of facts about religion can give students the false impression that the religious life of humankind is insignificant or unimportant. Failure to understand even the basic symbols, practices, and concepts of the various religions makes much of history, literature, art, and contemporary life unintelligible.

Study about religion is also important if students are to value religious liberty, the first freedom guaranteed in the Bill of Rights. Moreover, knowledge of the roles of religion in the past and present promotes cross-cultural understanding essential to democracy and world peace (Haynes & Thomas, 2007, p. 98).

The question that educators in public education should ask, therefore, is not “Should I teach religion?” but “How should I teach religion?”

The guidelines issued by 17 religious and educational organizations describe the difference between the teaching of religion and teaching about religion. Specifically:

- The school's approach to religion is academic, not devotional.
- The school may strive for student awareness of religions, but should not press for student acceptance of any one religion.
- The school may sponsor study about religion, but may not sponsor the practice of religion.
- The school may expose students to a diversity of religious views, but may not impose any particular view.
- The school may educate about all religions, but may not promote or denigrate any religion.
- The school may inform the student about various beliefs, but should not seek to conform him or her to any particular belief (Haynes & Thomas, 2007, p. 98).

The study of religion, therefore, can be and should be intentionally incorporated into the public school curriculum according to secular educational and religious organizations.

What, then, are teachers permitted to do and say in the schools related to issues of faith? Besides teaching about religion in an objective manner, teachers may bring in guest speakers, use religious symbols as supplemental resources, and teach about religious holidays without celebrating the latter (*School District of Abington Township v. Schempp*, 1963). Teachers may have students sing religious songs appropriate to the subject or holiday under study as long as secular songs are also sung (*Florey v. Sioux Falls School District*, 1980). In addition, teachers may wear jewelry bearing religious symbols (*James v. Board of Education of Central District No. 1, etc.*, 1972), answer student questions about their own religious beliefs with a brief statement about their personal faith (*Tinker v. Des Moines Area Independent School District*, 1969), and pray audibly and engage in other religious activities outside of the presence of students (U.S. Department of Education, 2003). Teachers may also be sponsors of student religious clubs in a non-participatory capacity (*Westside Community Board of Education v.*

Mergens, 1990) and lead and participate in religious, non-school related activities outside of the school day (*Wigg v. Sioux Falls School District*, 2004).

Through my own experience as a college professor of language education majors and as a supervisor of student teachers, I have seen firsthand the confusion that pre-service teachers have about the role of religion in public school education. For example, language education majors often believe that they cannot make any reference to the “Christian” religion in the classroom (such as mentioning that people in Spanish-speaking countries are primarily Catholic), illustrating the notion that public schools should be a religion-free zone. It is crucial that the education professors of future educators instruct them how they can teach about religion in ways that are constitutionally permissible, educationally sound, and sensitive to the beliefs of students and parents so that public school students receive a well-rounded education. Similarly, teacher candidates must also know that their students have the right to freely exercise their faith—to pray (*Engel v. Vitale*, 1962; *School District of Abington Township*, 1963; *Lee v. Weisman*, 1992; *Santa Fe Independent School District*, 2000); speak publicly about their faith (*Tinker v. Des Moines Area Independent School District*, 1969); distribute religious literature (*Slotterback v. Interboro School District*, 1991; *Johnston-Loehner v. O’Brien*, 1994); hold religious events; form religious student groups; and enjoy equal access to school facilities and funding (*Westside Community Board of Education v. Mergens*, 1990).

On the other hand, teachers are school employees, and therefore, are limited in their ability to exercise their faith at school because they are representatives of their school district. Teachers may not evangelize, extend invitations to religious activities, or pray with or in the presence of students (*Murray v. Pittsburgh Board of Public Education*, 1997). Teachers may not open the school day or a class with prayer (*Engel v. Vitale*, 1962; *Wallace v. Jaffree*, 1985) or

with a Bible reading (*School District of Abington Township v. Schempp*, 1963). In addition, teachers may not require students to participate in the Pledge of Allegiance by word or act (*West Virginia State Board of Education v. Barnette*, 1943) nor require students to study curriculum that violates their religious beliefs (*Tinker v. Des Moines Area Independent School District*, 1969). Teachers may not discourage or prohibit students from expressing their religious beliefs in their oral or written assignments (US Department of Education, 2003). By knowing the limitations as well as what is permissible and even appropriate as part of a well-rounded education, educators can then proactively embrace teaching about religion appropriately, allow students to exercise their faith, and also guard their own speech so that the school will not appear to endorse the teacher's religious views.

The same misunderstanding that pre-service teacher candidates have of what is and is not permitted concerning the teaching and practice of religion also exists among public school administrators and educators. A case in point is the many times when the organization, Alliance Defending Freedom, has handled the religious liberty violations of students and teachers since its foundation in 1994. This non-profit organization works to transform the legal system and “advocates for the right of people to freely live out their faith,” particularly regarding the issues of religious liberty, the sanctity of life, and marriage and family (Alliance Defending Freedom, n.d., About Us). Numerous examples are available on their website of the interventions that they have successfully made as well as court cases that they have won when administrators or teachers have incorrectly interpreted the Establishment clause and the Free-Exercise Clause of the First Amendment in regards to the practice of religion in public schools.

How can Christian educators called to work in public education know how to practice their faith in ways that are constitutionally permissible? Likewise, how can Christian parents

protect their child's right to exercise their faith in the public school arena? In order to be "wise [shrewd] as serpents and innocent [gentle] as doves" (Matt. 10:16), educators and parents should be informed as to what is permitted by the Constitution regarding the teaching and practice of religion in public education. The free online publication, *Finding Common Ground* (Haynes & Thomas, 2007) from the First Amendment Center, provides a detailed guide for parents, teachers, and students in regards to the practice of religion in public education. By knowing what is and what is not permitted, we can be equipped to take an active role when needed in instructing others that are misinformed about what the implementation of the First Amendment looks like in the public schools. It is essential, however, that we operate innocently and gently with those that we encounter that are misinformed. Christians are challenged to be a letter for Christ, representing him here on earth and glorifying him with our words and actions (II Cor. 3:2-3). The desired result is to have both educators and parents working together to apply the First Amendment fairly and justly for students in our public schools.

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APPENDIX A

“Religion in Public Schools” Survey (Correct Answers and Survey Results)

1. **TRUE** It is constitutional to teach about religion in public schools.
55% True 19% Probably True 12% Probably False 13% False 1% No Response
2. **TRUE** Many state standards in social studies recommend teaching about religion.
25% True 38% Probably True 22% Probably False 12% False 4% No Response
3. **FALSE** Study about religion may only be done in a world religions class.
6% True 19% Probably True 32% Probably False 42% False 1% No Response
4. **TRUE** The teacher may invite guest speakers to help with the study/discussion of religion.
28% True 43% Probably True 21% Probably False 5% False 3% No Response
5. **TRUE** A foreign language teacher may describe the Catholic or Christian practices/beliefs of the country being studied.
63% True 32% Probably True 2.5% Probably False 1.5% False 1% No Response
6. **TRUE** A US history teacher may teach students the role of religion in the American story.
71% True 22% Probably True 5% Probably False 2% False 0% No Response
7. **FALSE** The biblical account of creation may be taught in the science classroom.
13% True 19% Probably True 27% Probably False 39% False 2% No Response
8. **FALSE** Religious holidays may be celebrated in the classroom.
15% True 17.5% Probably True 30% Probably False 34.5% False 3% No Response
9. **TRUE** Religious symbols may not be used as a teaching aid or resource.
22% True 25% Probably True 32% Probably False 19% False 2% No Response
10. **TRUE** Teachers must remain neutral concerning religion.
57% True 31% Probably True 3% Probably False 6% False 3% No Response
11. **FALSE** Teachers must be neutral concerning civic virtue and moral character.
9% True 22% Probably True 22% Probably False 45% False 2% No Response
12. **TRUE** Teachers may not audibly pray or practice their religion in the presence of students at school.
63.5% True 25.5% Probably True 6% Probably False 2% False 3% No Response
13. **FALSE** Teachers may not wear religious jewelry such as a cross or Star of David.
17% True 16% Probably True 25% Probably False 40% False 2% No Response

14. FALSE Teachers may not audibly pray and engage in other religious activities during their free time in the school day.

18% True 15% Probably True 27% Probably False 36% False 4% No Response

15. FALSE Teachers may not answer student questions about their religious beliefs with a brief statement of personal belief.

11% True 23% Probably True 29% Probably False 35% False 2% No Response

16. TRUE Outside school hours, a coach or teacher may lead a religious activity that is not a recognized school club.

63% True 21% Probably True 9.5% Probably False 3.5% False 3% No Response

17. FALSE A coach or teacher may lead prayer at practice or a game.

16% True 21% Probably True 32% Probably False 28% False 3% No Response

18. TRUE Students may distribute religious materials during non-instructional time.

39% True 30% Probably True 19% Probably False 9% False 3% No Response

19. FALSE Students may not audibly express their religious views in the classroom.

3% True 7% Probably True 25% Probably False 65% False 0% No Response

20. FALSE Students may not express their religious views in their written assignments.

2.5% True 5% Probably True 20% Probably False 71.5% False 1% No Response

21. FALSE Students may not lead or initiate prayer at a graduation ceremony.

11% True 22% Probably True 15% Probably False 46% False 6% No Response

22. TRUE In the cafeteria and halls students may pray audibly.

58% True 25% Probably True 7% Probably False 7% False 3% No Response

23. TRUE Students may initiate and lead prayer before, during, and after sporting events.

65% True 25% Probably True 7% Probably False 2% False 1% No Response

24. TRUE Students may bring their Bibles to school and read them at school.

76% True 17% Probably True 5% Probably False 1% False 1% No Response

25. TRUE Students may form extracurricular religious clubs.

80% True 18% Probably True 2% Probably False 0% False 0% No Response

26. TRUE Students may wear clothing bearing a religious message to the extent that other like articles of dress are permitted.

73% True 16% Probably True 6% Probably False 3% False 2% No Response

Select your current year:

27% Freshman 27% Sophomore 24% Junior 21% Senior 1% Other