### DOCUMENT RESUME

ED 384 925 CS 508 966

AUTHOR Shelton, Michael W.

TITLE "Political Correctness--Reality or Myth in the

Academic Workplace?"

PUB DATE Apr 95

NOTE 17p.; Paper presented at the Annual Meeting of the

Southern States Communication Association (New

Orleans, LA, April 5-9, 1995).

PUB TYPE Viewpoints (Opinion/Position Papers, Essays, etc.)

(120) -- Speeches/Conference Papers (150)

EDRS PRICE MF01/PC01 Plus Postage.

DESCRIPTORS \*College Faculty; Conservatism; Higher Education;

\*Humanities; \*Language Role; Liberalism; \*Political Attitudes; Racial Bias; Sex Bias; Social Values;

\*Universities

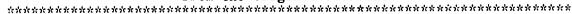
IDENTIFIERS Faculty Attitudes: Indoctrination; \*Political

Correctness; \*Politically Correct Communication

#### **ABSTRACT**

Political correctness (PC) is often associated with attempts to place limits or boundaries on expressions of racist, sexist, or homophobic attitudes and feelings. PC is most often associated with such efforts on college and university campuses. Many critics of PC have attempted to suggest that these activities pose a great threat to American society. They suggest that PC is restrictive of opinion and free expression. The comments of Nat Hentoff are typical. He notes that "many white male students, faculty members and administrators are convinced that speech must have its limits if racism, sexism, and homophobia are to be extirpated in and out of the classroom." It would be naive, however, to assume that anti-PC criticism is a by-product of objective investigation. Much of the anti-PC rhetoric is a direct result of highly organized and well-funded campaigns by conservative elements. Further, virtually all of the evidence against TC consists of collections of anecdotes. There is no hard, quantitative data to prove the extent or impact of a PC "movement." Also, the sheer quantity of faculty engaged in higher education in this country suggests that political viewpoints are far more diverse than a PC norm. An objective examination of the status of PC on American campuses casts much doubt on the positions advanced by critics--it seems unlikely that there is much, if any, organized effort to program students with PC ideas. (Contains 60 footnotes.) (TB)

from the original document.





Reproductions supplied by EDRS are the best that can be made

# "Folitical Correctness-Reality or Myth in the Academic Workplace?"

Michael W. Shelton
Department of Communication
University of Kentucky
Lexington, Kentucky 40506

PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

M. Shulton

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC) "

U.S. DEPARTMENT OF EDUCATION Office of Educational Research and Improvement EDUCATIONAL RESOURCES INFORMATION

- CENTER (ERIC)

  This document has been reproduced as received from the person or organization originating it
- ☐ Minor changes have been made to improve reproduction quality
- Points of view or opinions stated in this document do not necessarily represent official OERI position or policy

**BEST COPY AVAILABLE** 



## "Political Correctness—Reality or Myth in the Academic Workplace?"

The issue of PC, or political correctness, has garnered significant attention ever since "it leaped into the nation's newspapers and everyday speech in 1990". Media and public attention to the issue has been substantial. Most every notable media outlet has, in recent years, discussed, examined and analyzed PC. The significance of this media attention cannot be overstated. "Time, Newsweek, The New Republic, The Atlantic Monthly, Night Line, The McNeil/Lehrer News Hour, and all the major papers of record have featured, at one time or another, jeremiads on the new menace" of PC. Most of these media accounts have painted a portrait of a large, organized movement that threatens free expression, Western culture, and the American way of life. There are, however, problems with this picture. Much of the coverage about the so-called dangers of PC is one-sided, exaggerated, and heavily influenced by a "smear" campaign of the political right. This paper will examine the issue of political correctness and the right-wing campaign that has arisen to discredit the concept. The picture of a substantial PC threat that so often appears in the mainstream media will be contrasted vith the reality of the situation on American college and university campuses.

PC is often associated with attempts to place limits or boundaries on expressions of racist, sexist, or homophobic attitudes and feelings. PC is most often associated with such efforts on our nation's college and university campuses. The use of the label PC is pervasive. "These days, anyone who suggests a remark or reading assignment is sexist, racist, homophobic, or otherwise offensive is susceptible to being branded politically correct". It is this kind of campus political behavior that has caught the attention of the media, campus administrators and



much of the general public. One view of PC and its accompanying coverage in the mainstream media was summarized in this way:

Two years ago, readers could not have escaped the daily newspaper' barrage of Op-Ed page warnings on the scourge of "political correctness". From Ivy League to community colleges--so the storytellers claimed--leftists, radical feminists, and angry people of color had seized the wheels of higher education. The fate of Western Civilization hung in the balance. Dinesh D'Souza became an overnight success with his <u>Illiberal Education</u>, a grab bag of anecdotes about campus zealotry. Leading the anti-PC charge was the National Association of Scholars (NAS), the Right's first sustained organization of university faculty nationwide.<sup>4</sup>

This scenario continues to play out in what one Associated Press report called "the battle for political correctness on campus...."

As noted, media attention to PC has been substantial. Indeed, treatment of PC appears to be a favorite topic for the media. "The latest trend in intellectual (and not so intellectual) magazines, lest you have been asleep, is a widespread denunciation of the tyranny of the politically correct". In fact, "Every few days there is a new report or opinion piece in the newspapers showing how people are afraid to say what they think lest they be condemned by the dominant and domineering PC monitors." As one source has noted, "There seems to be sightings of political correctness 'thought police' everywhere."

The term PC has been used to label a wide range of activities. "Political correctness" has been used as an umbrella term associated with multiculturalism, campus diversity, affirmative action, and even the study of popular culture. Many critics of PC have attempted to suggest that these activities pose a great peril to American society. Even a casual observer of the media could recognize that this notion of peril or threat is hyped by many who examine PC. "Featured on some half-dozen magazine covers, this new 'crisis' on American campuses has taken on as many catchy new labels. 'The New McCarthyism', 'New Fascists', 'New



Orthodoxy', and the 'Hegemony of the Politically Correct'."<sup>10</sup> The use of the catch-all label PC has served a very pragmatic function. The media can more easily attack a monolithic concept named PC. "Then they are given a name....because after naming them it is possible to write about them monolithically, no matter how diverse their views."<sup>11</sup> The term PC is used to collect a number of enemies into a single camp.

PC has tended to be pictured as a threat or danger to American college campuses and American society as a whole. Dinesh D'Souza, one of the leading critics of PC and related enterprises, has suggested that "the American university today is a disturbed and sometimes disturbing place, and the consequences are by no means confined to the campus". Another critic has suggested that "the threat" of PC may "spread to the real world". Such expressions conjure up images of some monster from a 1950s science fiction film, escaping from the lab to threaten the American way of life.

Most critics of PC work from the assumption that politically correct behavior is restrictive of opinion and free expression. The comments of Nat Hentoff are typical. He notes that "many white male students, faculty members and administrators are convinced that speech must have its limits if racism, sexism, and homophobia are to be extirpated in and out of the classroom. They would banish professors infected with any or all of these viruses."

The implication is that endorsement of PC is inherently associated with limitations on the freedom of expression. One critic reported that "some universities are becoming places where expression is more limited than encouraged". Some critics underscore the risk by noting that "any inhibition of free speech, especially at universities....is dangerous." Other critics have gone



so far as to use the ever-threatening label "censorship" to refer to PC behavior on college campuses.<sup>17</sup>

Many critics of PC paint the danger on college campuses as being most pronounced. They suggest that innocent young students are being programmed by left-wing professors. Critics of PC suggest that a "cadre" of leftists is enforcing PC on American college campuses. One PC critic has observed that "administrators and faculty" are "enforcing political correctness today". An anonymous op-ed piece in the Washington Times suggested that leftists from the 1960s had become the tenured PC police of the 1990s:

Political correctness seems to have bubbled up from the dyspeptic veterans of the New Left, many of whom are now empowered on faculties and in university administrations all over the country. PC is a more subtle but no less dangerous version of what New Left striplings in the 1960s tried to belch out on campuses by trashing building, disrupting classes, and beating up professors, deans, and students who disagreed with their line. Now that they have grown up to be college professors and deans themselves, they've decided to beat up the whole concept of academic freedom in the name of what they purport to be the demons of racial and sexual bigotry.<sup>20</sup>

Thus, critics would suggest that political correctness not only exists on college and university campuses, but that it is being imposed on a captive, youthful audience by seasoned veterans of the political left.

Critics of PC often refer to attempts to impose a rigid "new orthodoxy" on college students. This imposition of new behavioral standards is viewed as a serious threat by many critics. "The tragedy", according to one commentator, "is that a vocal but critical mass has adopted a self-righteous dogmatism that scares many of us who have fought the same battles. In the worst cases, one rigid world view has been replaced with a politically correct new orthodoxy."<sup>21</sup>



PC critics often speak of PC activists as zealots and radicals, many critics have suggested that PC supporters threaten other students, attempt to limit free expression, and endanger traditional American educational values. Dinesh D'Souza, author of the often cited text, <u>Illiberal Education</u>, offers typically hyperbolic accounts of PC-related incidents. Indeed, his text and other commentary frequently make reference to specific instances of excess by practitioners of PC.<sup>22</sup> D'Souza and his cohorts argue that the intent of the PC activists is to thrust American colleges and universities into an effort to promote social reform that will result in a model "multicultural community".

The so-called dangers of multiculturalism or cultural pluralism have been further exploited to heighten the risks associated with PC. The duel threat of multiculturalism and PC has been addressed by a number of commentators. One critic contends that multiculturalism and political correctness contribute to group separatism that "crystallizes the differences," "magnifies the tensions" and "intensified hostilities." Another critic views multiculturalism as part of a larger PC scheme that "seeks to suppress thoughts or statements deemed offensive to women, blacks, or other groups". The end result, according to D'Souza, is a new authoritarianism. Indeed, he feels that it can happen "with insidious ease."

PC is often portrayed as a "threat", a "danger", or a great "peril" to befall America. The terms "danger", "threat", and "peril" appear rather frequently in accounts of PC related incidents. Such terms as "barbarism", "fascism", and "totalitarianism" are also associated with PC activities. These terms carry heavy political baggage for the average media consumer. These terms create an image of evil and peril. The use of such language is very telling. "The words that come up in the anti-political correctness' campaign tell us a good deal about the



mental life of culture guardians like D'Souza and Kimball, who see themselves protecting the West....<sup>26</sup> Additionally, the language PC critics "use when objecting to people questioning what should be in the university curriculum and who should be on the faculty is filled with metaphors of the dichotomy between people of light and the people of dark--a contrast that comes, of course, from the long era euphemistically referred to in textbooks as the 'Age of European Exploration.' The language employed by PC critics is clearly designed to engender perceptions of fear and danger. The persuasive power of such language has been well documented. <sup>26</sup>

It would be naive to assume that anti-PC criticism is a by-product of objective investigation. Much of the anti-PC rhetoric is a direct result of a highly organized and well funded campaign by conservative political elements. As previously noted, many of the conservative opponents of PC attempt to link the movement with efforts to restrict or stifle free expression. Conservative theorists suggest that "the politically correct hope to transform the university into a den of multiculturalism--silencing everyone who would dare dissent by calling them 'sexist', 'racist', or 'anti-deconstructionists'."<sup>29</sup>

PC is simply the most recent target of the conservative right. Gerry O'Sullivan notes that "with the end of the Cold War, it's nice to know that the right has found a new shark to hunt. The new enemy is something called "political correctness'." O'Sullivan goes on to say that "judging from the mainstream media, PC threatens to undermine western civilization, heterosexuality, the family, free speech, the integrity of history and everything else that Americans allegedly hold dear--particularly on the campuses of the nation's elite universities." Diamond has suggested that "the PC hunters" have a "decidedly political agenda." O'Sullivan notes that



Conservative opposition to PC represents the efforts of a highly organized and well funded operation. The extent of this opposition has been well documented:

Be find the current campaign against political correctness is a heavily funded network of right-wing think-tanks such as the Heritage Foundation, the American Enterprise Institute, the Intercollegiate Studies Institute, and the Institute for Educational Affairs, fueled with monies from friendly donors like the Olin and Smith Richardson Foundations. The latter is particularly noteworthy; in the past, the Smith Richardson Foundation has given 65,000 to the pro-contra Institute for Religion and Democracy, and it has also funded such right-wing projects as a television documentary entitled "Two Cheers for the CIA." 33

The opponents of PC are, apparently, a well organized and well funded effort. Some anti-PC efforts have been linked with well established right-wing organizations, including groups that have contributed funds to promote death squads in Central America and elsewhere.<sup>34</sup>

The role of a conservative elite goes beyond funding and organization. Many prominent critics of PC are well established members of a right-wing elite. Dinesh D'Souza, for example, is a Dartmouth educated, conservative idealist. David Beers explains:

Upon graduation, D'Souza went the way of other idealistic "alternative" journalists who write what's unpopular, damn the consequences: He moved, via a short stint at the Heritage Foundation, into the Reagan administration as senior policy analyst focusing on domestic issues. Since 1988, he has been ensconced at the American Enterprise Institute, part of the wishy think-tank system that conservative money has built.<sup>35</sup>

Many other critics of PC hold similar, conservative credentials.

One of the most powerful instruments of anti-PC forces is a collection of conservative educators called the National Association of Scholars, the NAS. The NAS has been explained in this way:

One by-product of the "political correctness" campaign was the National Association of Scholars' consolidation of a network of 3,000 faculty members, organized into 29 state affiliates. Gracing the NAS advisory board is an array of



prominent neoconservative intellectuals, including Jeane Kirkpatrick. Irving Kristol, Seymour Martin Lipset and John Bunzel. The membership spans the range of high-status private universities to small community colleges.

It has been suggested that the NAS is funded by a "bottomless pit of corporate foundation grants." The nature of that funding has been described in this manner:

The four-year-old, fourteen-hundred-member NAS gets funding from prominent right-wing foundations, publishes a journal that attacks everything from feminist scholarship to supposed "leftist control" of Latin America, and is closely linked with what is now the Madison Center for Education Affairs, begun by neo-con guru Irving Kristel and former treasury secretary William Simon and founded under its present name by William Bennett and Alan Bloom. Another of the Madison Center's pet projects is the funding and promotion of dozens of conservative campus newspapers around the nation.<sup>28</sup>

The bond between opponents of PC and a broader, conservative agenda seems apparent.

Right-wing political elements not only directly combat the PC movement, but they often influence the means by which the mainstream media provide coverage of the issue. The standard media coverage of PC incidents is relatively one-sided. Indeed, "as things stand, only one side of this debate has made its way into the national media. All articles are by none-too-liberal men, usually white, defending the traditional academy". It appears that the "PC point of view is only described in caricature, without the kind of depth that might count as either 'objectivity'....or honest intellectual inquiry".

Reports about PC also tend to focus on a collection of atypical examples. In fact, "most of the arguments follow a very similar line, drawing upon the same body of outrageous cases." After painting a picture of the broad threat associated with PC, many critics "then display their evidence of this new fascism--bizarre, isolated incidents that in themselves may be troubling...but in total don't add up to a multicultural conspiracy." One of the chief problems in examining PC is that "its scope and gravity have been exaggerated by most conservative



reactions and in the popular media, "43 Indeed, the bulk of mainstream media coverage regarding PC has been an exercise in hyperbole. "The wave of articles in the popular press....about the new 'thought police' at the universities was no doubt exaggerated, a tactic of sensationalist journalism, as many of those criticized in the articles justifiably protested."44

Virtually all of the evidence against PC consists of collections of anecdotes. There is no hard, quantitative data to prove the extent or impact of a PC "movement". There has been no systematic investigation of PC activities on American college and university campuses. "The problem with all such impressionistic judgments about either the prevalence or the limited scope of political correctness", according to Robert Alter, "is that the quantitative dimensions of the phenomenon remain unclear."

There are other problems associated with the assessments which claim that political correctness is now a dominant and widespread movement. The sheer quantity of faculty engaged in higher education in this country suggests that political viewpoints are far more diverse than a PC norm. "In a country with thousands of institutions of higher learning, the political demography of the profession has to be considerably more variegated than alarmist accounts would lead us to believe." Additionally, there is no reason to believe that PC thought police dominate each and every academic discipline at institutions of higher education. To see the real proportions of the movement, one must keep in mind that it is limited in this disciplinary scope. It has scarcely touched departments of physics, chemistry, and mathematics; schools of engineering, medicine, and business administration; and even within the humanities, it has made few inroads in some departments, such as Slavic studies and philosophy." The overall scope

and threat of PC may well be one of the greatest exaggerations in modern political, cultural, and social history.

An objective examination of the status of PC on American campuses casts much doubt on the positions advanced by critics. For example, it seems unlikely that there is much, if any, organized effort to program students with PC ideas. This is likely to be true, because "the number of college faculty who identify themselves as 'left' is tiny...." Furthermore, "there have always been many eighteen-to-twenty-year-olds who are strident and angrily simplistic in their rhetoric. But it insults those who are agitating for change on campus simply to say they've been programmed with 'PC' ideas by a cadre of leftist academics."

A degree of objective coverage regarding political correctness has revealed that the issue is not posing a substantial threat to American culture and values. For example, one source recently reported that PC is in a "lull" on American campuses. Another source reported that "the politically correct movement is not extensive on many campuses. One campus correspondent has written that the "popularity and novelty of the PC movement have apparently come and gone. Another journalist has written that "after wading through much of the anecdotage of PC hysteria, my own conclusion is that very little of it supports the charge that anyone's right of free expression is being stifled, let alone that there is a reign of terror on campus. Indeed, "like communists during the McCarthy era, people who actually profess 'political correctness' are not so easy to find..."

Additionally, critics of PC fail to recognize that the concept has many respected supporters. Many students, faculty members, and administrators view PC very favorably. One student has noted that "political correctness is not zealotry" but the "recognition that everyone,



regardless of sex, age, race, religion, handicap (or political affiliation, you will be surprised to know) has a right to an opinion". <sup>55</sup> A college president has expressed the view that political correctness is consistent with, and supportive of traditional intellectual freedom. <sup>56</sup>

Critics of PC also downplay the scholarly support associated with diversity, multiculturalism, and other PC-related concepts. A number of scholars have commented on the value of educational diversity which PC helps to promote. A broad degree of diversity in education, for example, has been viewed as critical to social access.<sup>57</sup> Diversity has also been linked with such traditional American values as the expansion of democracy.<sup>58</sup> Indeed, it has been argued that diversity is one of the very foundations of education. "Inherent in the tradition of the university", writes Laura Goodman, "is a strong commitment to the expression of diverse views on various subjects."<sup>59</sup>

Although the significance of the PC movement and the dangers associated with it have been exaggerated and exploited by a campaign conducted by right-wing political elements, political correctness is an issue that is likely to remain relevant and topical for some time to come. The PC debate is also likely to reach beyond the campus. Indeed, there is mounting evidence that PC-related issues are beginning to characterize many public issues in a number of forums. "Many scholars cite the Anita Hill-Clarence Thomas controversy, the debate over gays in the military, fights over multicultural education in public schools, and the clashing opinions over the Columbus quincentennial as evidence that an increasingly diverse society is confronting similar issues." As long as the potential for such issues to flourish exists, there will be the potential for political forces to capitalize on their effects. For now, it is probably safe to say that the "threat" of PC in the academic workplace is more myth than reality.



### NOTES

- <sup>1</sup> Carolyn Mooney, "A Lull in the Campus Battle Over 'Political Correctness'", <u>The Chronicle of Higher Education</u>. April 21, 1993, p. A15.
  - <sup>2</sup> Gerry O'Sullivan, "Against the Grain", The Humanist, September/October 1991, p. 45.
  - <sup>3</sup> "The PC Scare". Social Policy, Summer 1991, p. 15.
- <sup>4</sup> Sara Diamond. "Notes on Political Correctness", <u>Z Magazine</u>. July/August 1993, p. 30.
- <sup>5</sup> "Free speech wins round against political correctness". <u>Ogden Standard-Examiner</u>, September 12, 1993, p. 3A.
  - <sup>6</sup> Laura Fraser, "The Assault on 'New McCarthyism'" Extra, May/June 1991, p. 6.
  - <sup>7</sup> "The PC Scare", p. 15.
  - <sup>8</sup> Ibid, p. 15.
- <sup>9</sup> Tim Brennan, "PC and the Decline of the American Empire", <u>Social Policy</u>, Summer 1991, p. 17.
  - <sup>10</sup> Fraser, p. 6.
  - <sup>11</sup> Ibid, p. 7.
  - <sup>12</sup> Dinesh D'Souza, "Illiberal Education", Atlantic Monthly, March 1991, p. 30.
  - <sup>13</sup> Nat Hentoff, "The New Jacobins", Reason, November 1991, p. 30.
  - <sup>14</sup> Ibid, p. 31.
- <sup>15</sup> Kollen Long, "The politically correct bandwagon is crashing--but still dangerous", <u>Los Angeles Times</u>, May 12, 1991, p. M3.
  - 16 Ibid, p. M.
- <sup>17</sup> James Gerstenzang, "Bush decries 'intolerance' to free speech", <u>Los Angeles Times</u>, May 5, 1991, p. A1.
  - <sup>18</sup> Hentoff, p. 32.



- <sup>19</sup> Eugene Genovese, "Heresy, Yes--Sensitivity, No", <u>The New Republic</u>, April 15, 1991, p. 30.
  - <sup>20</sup>"Political Correctness", Washington Times, May 7, 1991, p. 31.
- <sup>21</sup> Ruth Rosen, "New times, fossil minds on the campus", <u>Los Angeles Times</u>, January 20, 1991, p. M7.
- <sup>22</sup> See Denesh D'Souza, <u>Illiberal Education--The Politics of Race and Sex on Campus</u>, (New York: The Free Press, 1991).
- <sup>23</sup> Arthur Schlesinger, Jr., "The cult of ethnicity, good and bad", <u>Time</u>, July 8, 1991, p. 21.
  - <sup>24</sup> Sam Allis, "Whose America?", <u>Time</u>, July 8, 1991, p. 13.
  - <sup>25</sup> D 'Sovza, "Illiberal Education", p. 73.
  - <sup>26</sup> Brennan, p. 16.
  - <sup>27</sup> Ibid, p. 16.
- <sup>28</sup> For a discussion of the persuasive power of language, See Charles U. Larson. Persuasion--Reception and Responsibility, (Belmont, CA: Wadsworth, 1992).
  - <sup>29</sup> Fraser, p. 6.
  - <sup>30</sup> O'Sullivan, p. 45.
  - <sup>31</sup> Ibid, p. 45.
  - <sup>32</sup> Diamond, p. 30.
  - <sup>33</sup> O'sullivan, p. 45.
  - <sup>34</sup> Fraser, p. 6.
  - <sup>35</sup> David Beers, "P.C.? B.S.", Mother Jones, September/October, 1991, p. 65.
  - <sup>36</sup> Diamond, p. 30.
  - <sup>37</sup> Ibid, p. 30.
  - <sup>38</sup> Beers, p. 64.



- <sup>39</sup> Fraser, p. 7.
- <sup>40</sup> Ibid, p. 7.
- <sup>41</sup> Ibid, p. 7.
- <sup>42</sup> Ibid, p. 8.
- <sup>43</sup> Robert Alter, "The Persistence of Reading". Partican Review. Vol. LS, 1993, p. 512.
- <sup>44</sup> Ibid, p. 510.
- <sup>45</sup> Ibid, p. 512.
- <sup>46</sup> Ibid, p. 511.
- <sup>47</sup> Ibid, p. 511.
- <sup>48</sup> O'Sullivan, p. 46.
- <sup>49</sup> Troy Duster, "They're Taking Over", Mother Jones, September/October, 1991, p. 63.
- <sup>50</sup> Mooney, p. A15.
- <sup>51</sup> William Neikins, "Bush on diversity: His critics hear a harder line on Civil Rights", Chicago Tribune, May 12, 1991, p. 4.
  - <sup>52</sup> Long, p. M3.
- <sup>53</sup> Michael Kingsley, "Hysteria over 'political correctness': Where's this left-wing reign of terror on campus?", Washington Post, May 3, 1991, p. A25.
  - <sup>54</sup> "The PC Scare", p. 15.
- <sup>55</sup> Erin Ernis, "Letters to the Editor: Is 'PC' really a threat to colleges?". <u>The Wall Street Journal</u>, December, 17, 1990, p. A10.
- <sup>56</sup> Eamon M. Kelly, "Letters to the Editor: Is 'PC' really a threat to colleges", <u>The Wall Street Journal</u>, December 17, 1990, p. A10.
- <sup>57</sup> Frances Oakley, "Apocalypse Now in U.S. Higher Education", America, April 1, 1989, p. 287.

- <sup>58</sup> Martha A. Crunkleton, "The Flight to Community: Pluralism, Democracy, and Higher Education", <u>Liberal Education</u>, January/February, 1991, p. 8.
- <sup>59</sup> Laura L. Goodman, "Shacking Up With the First Amendment: Symbolic Expression and the Public University", <u>Indiana Law Journal</u>, 64 (1989), p. 716.
  - <sup>60</sup> Mooney, p. A15.

