
HAS STUDENT VOICE BEEN ELIMINATED? A CONSIDERATION OF STUDENT ACTIVISM POST-PARKLAND

Paul J. Geis
Kent State University

David Blacker points to a problematic decline in personal freedoms, including student speech rights: “[A]s the ‘educational mission’ of schools moves ineluctably even further toward warehousing and surveillance—pre-jail—then remaining intra-institutional speech rights will easily be quashed.”¹ Critical of the elastic conception of educational mission as put forth in *Morse v. Frederick*, he warns that matters of school safety will take precedence over student speech rights, especially in the wake of the Sandy Hook school shooting in 2012, and earlier and future school shootings. In the wake of yet another mass school shooting, I examine whether Blacker was correct to sound the alarm about an elimination of student voice. Much public attention focused on debates around gun control and Second Amendment rights after the mass shooting in Parkland, Florida this past February but that is not my focus here. Samantha Deane addresses broader questions of gun violence and schools in her recent growing body of work, as do others.² Similar to Kathleen Knight Abowitz and Dan Mamlok’s recent article on political emotion in civic education, I use the post-Parkland context to bring concepts from philosophy of education to bear on real contemporary events in schools.³ I am interested in what we learned about schools and democratic education in the subsequent days, weeks, and months. Heeding Blacker’s warning, I worry that broad and vague safety concerns among school administrators may have constrained student speech. I turn to Sarah Stitzlein and Bryan Warnick to analyze student

¹ David J. Blacker, *The Falling Rate of Learning and the Neoliberal Endgame* (Winchester, UK: Zero Books, 2013), 187.

² See Samantha Deane, “Trigger Warnings: How Guns are Re(Shaping) Education,” *American Journal of Education Forum*, September 25, 2017, <http://www.ajeforum.com/trigger-warnings-how-guns-are-reshaping-education-by-samantha-deane>; Samantha Deane and Katie Bateman, “Becoming Sensitive to School Gun Violence,” *American Journal of Education Forum*, May, 2018, <http://www.ajeforum.com/becoming-sensitive-to-school-gun-violence-by-samantha-deane-and-kathryn-m-bateman>; and Amy Shuffleton and Samantha Deane, “Study War No More: Trigger Warnings and Guns in the Classroom,” in *International Handbook of Philosophy of Education*, ed. Paul Smeyers (Cham: Springer, 2018). See also Kellner, *Guys and Guns Amok* (Boulder: Paradigm, 2008), and multiple authors of a dedicated issue of *Educational Theory* (65, no. 4) in 2015.

³ See Kathleen Knight Abowitz and Dan Mamlok, “The Case of #NeverAgainMSD: When Proceduralist Civics Becomes Public Work by Way of Political Emotion,” *Theory & Research in Social Education* 47, no. 2 (2019): 155–175.

and school responses. Drawing on their ideas on democratic habits and student free speech respectively, I explore whether the actions of students and school administrators substantiated Blacker's pessimistic concerns for the elimination of student voice, or whether signs of hope for democracy emerged post-Parkland.

ELASTIC SCHOOL MISSION AND ELIMINATION OF STUDENT VOICE

Blacker cautions that the increased elasticity of school mission in progressive decisions of *Fraser*, *Kuhlmeier*, and *Morse*, moves us toward elimination of student voice.⁴ Virtually any activity can become a core activity to the school's mission, enabling schools to restrict student speech across a broad spectrum of activities, whether it be because of disruption or because of message. This transforms nearly all instances of student speech into school-related speech. Following the shooting in Florida, a phenomenon emerged that positioned Blacker's cautionary theorizing as a potential reality. Unlike past mass shootings, the news in Parkland quickly shifted from those who had been killed to those who had survived, to students who had a voice, knew their rights, were speaking out, and who knew their civics and history.

For many observers, this informed and well-articulated activism, particularly on the part of certain high-profile Marjory Stoneman Douglas High School (MSDHS) students such as Emma Gonzalez and David Hogg, was a demonstration of the ability of our schools (or at least one school) to prepare young people as engaged, democratic citizens. As teachers and school administrators around the country began to work with students, Blacker's cautionary warning risked becoming a reality. While they may have faced punishment for leaving school grounds, walkout students would enjoy the same freedom of any citizen while marching on public streets. School administrators had no authority to discipline students for speech during the walkouts, or during events such as televised town halls, the March for Our Lives in Washington, or demonstrations at state houses. However, once students agreed to collaborate with teachers and administrators on events to take place on school grounds, they were subjected to potential constraints in their speech.

Educators may have intended to spare students the consequence of suspension for walking out, but they needed to equally attend to the potential suppression or elimination of student voices as a result of their engagement with the students' activism. Well-intentioned, teachers and administrators ran the risk of co-opting independent events of student activism and bringing them under the control of the schools. Reflecting Blacker's concerns about the elasticity of the mission of schools, this gave school administrators broad latitude in limiting, or even eliminating, student speech at these events. With these concerns in mind, it is critical that we examine what students did in the wake of the shooting, and the role that schools seemingly played prior to the event in preparing students to assume their roles as activist citizens.

⁴ Blacker, *The Falling Rate*, 166–173.

DELIBERATIVE DEMOCRACY AND STUDENT FREE SPEECH

Some proponents of deliberative democracy privilege the coming together for face-to-face deliberation, and ultimately compromise. While they do not dismiss activism, Amy Gutmann and Dennis Thompson approach it with some caution. Activism, they contend, may be valuable when it moves us toward the goals of coming together for deliberation and compromise, but is potentially disruptive to these goals and often further polarizes us.⁵ Iris Marion Young highlights the tension between the deliberative democrat and the activist, recognizing that many of us move between the two stances.⁶ Young and her respondents recognize the desirability and necessity of both deliberation and activism.⁷ Sarah Stitzlein’s work allows for such a broader conception of deliberative democracy in which protest—an act of dissent—is valued equally with, and not simply as a path toward, the formal aspects of coming together for compromise. For this reason, I turn to Stitzlein for my analysis of democratic habits.

Attention to student voice post-Parkland reflects a broader discussion of free speech in educational spaces. Sigal Ben-Porath addresses a problematic context in which students are increasingly polarized in their views and are calling for limitations to free speech on college campuses.⁸ In advocating for inclusive freedom around student free speech, Ben-Porath notes that legal frameworks are not sufficient given the specific contexts of the university. Similarly, Bryan Warnick points to the lack of legal clarity on the specific contexts that shape student free speech in schools. Warnick points us toward an *educational criterion* in how we limit student speech and Ben-Porath urges the use of pedagogic tools toward an inclusive environment, rather than administrative and legal monitoring of student speech.⁹ While the contexts of student free speech in schools and on college campuses are connected, it is important to recognize that there are both legal and ethical contexts that distinguish them. Therefore, I turn to Warnick in particular here because of the unique context of children in public schools.¹⁰

⁵ Amy Gutmann and Dennis Thompson, *Democracy and Disagreement* (Cambridge, MA: Belknap Harvard, 1996); Amy Gutmann and Dennis Thompson, *The Spirit of Compromise* (Princeton: Princeton University Press, 2012).

⁶ Iris Marion Young, “Activist Challenges to Deliberative Democracy,” *Philosophy of Education Yearbook* (2001): 41–55.

⁷ Young, 41–55; Natasha Levinson, “Deliberative Democracy and Justice,” *Philosophy of Education Yearbook* (2001): 56–59; Emily Robertson, “Why Can’t We Have It All?” *Philosophy of Education Yearbook* (2001): 60–63.

⁸ Sigal Ben-Porath, *Free Speech on Campus* (Philadelphia: University of Pennsylvania Press, 2017).

⁹ Ben-Porath, 102.

¹⁰ Bryan R. Warnick, *Understanding Student Rights in Schools: Speech, Religion, and Privacy in Educational Settings* (New York: Teachers College Press, 2013), 2.

Stitzlein's and Warnick's writings provide us with frameworks to examine whether student voice was indeed eliminated in the wake of a school shooting. In the analysis that follows, I engage with Stitzlein's habits of democracy to understand student speech and activism in the aftermath of Parkland.¹¹ I then turn to Warnick's writing on student speech rights in school to examine the ways in which educators responded to this activism.

HABITS OF DEMOCRACY IN SCHOOLS

Stitzlein contends that schools can address our political problems through the cultivation of specific democratic habits.¹² According to Stitzlein, "habits are ways of being that are largely performed without effort or conscious attention."¹³ She underscores that living democratically is a personal endeavor, yet takes place in very social ways. Group problem solving, communication, and shared experiences are integral components of democratic living, and "citizenship education . . . must be thoroughly social."¹⁴ While it is important for individual habits to be developed, Stitzlein is specifically concerned with their public enactment in students' "transactions with others . . . in the real contemporary contexts of public schools and the social and political influences they currently face."¹⁵ While not limited to their confines, schools are particularly suited to foster the specific habits of democracy.¹⁶ Students' actions after the Parkland shooting demonstrated significant degrees of group problem solving, communication, and shared experiences in the most real of contemporary contexts. I frame my analysis in several of the specific habits that Stitzlein identifies as most essential to students' emerging role responsibilities as citizens and that should therefore be cultivated within public schools.¹⁷

¹¹ See Sarah M. Stitzlein, *Teaching for Dissent: Citizenship Education and Political Activism* (New York: Routledge, 2012); Sarah M. Stitzlein, *American Public Education and the Responsibility of Its Citizens: Supporting Democracy in an Age of Accountability* (New York: Oxford University Press, 2017).

¹² Stitzlein, *American Public Education*, 173. According to Stitzlein, "sustaining democracy as a political system and a way of life requires the skills and knowledge best, at times even uniquely, offered in public schools" (47). "Though public schools may have had many weaknesses throughout their history, our democratic goals are perhaps most achievable within their walls, rendering them worthy of our support" (93).

¹³ A Deweyan conception of habits forms the core of Stitzlein's vision of citizenship education. Her understanding of habits should not be confused with more common notions of uninformed, repetitive action. They are dynamic and are "tested out and improved" through an ongoing reciprocal relationship with reflective thought. Habits, differing from morals, are not prescribed ahead of time; they are not so much about *what* we do but about *how* we decide to do something in a new situation. Stitzlein, *American Public Education*, 169–171.

¹⁴ Stitzlein, 173.

¹⁵ Stitzlein, 174.

¹⁶ Stitzlein, 178.

¹⁷ Stitzlein, 181–201.

CITIZENSHIP OF SHARED FATE

A conception of citizenship as shared fate counters the neoliberal focus on individual self-interest and brings about an evolved patriotism that is rooted in a new sense of shared future and boundedness across ideologies. Social responsibility within this framework drives action that is oriented toward the well-being of a new public, an *us* that is not constrained by formal boundaries of citizenship and national borders, and, Stitzlein notes, “has a bent toward concern for others and responsibility to their well-being.”¹⁸ This conception of citizenship emerges in a context of a shifting national identity, amid a growing and diversifying population in the US, but remains connected to history. The youth who mobilized in the wake of the shooting in Parkland, specifically those from MSDHS, embodied elements of this habit of citizenship as shared fate. During a speech at a gun control rally three days after the shooting, MSDHS senior Emma Gonzalez did not focus on her own personal suffering and trauma, nor on that of her schoolmates and teachers. She did not speak just about what needed to be done to secure her school. Rather, she spoke as part of a collective *we* who extended beyond those physically present at the rally. Gonzalez stated that “our neighbors will not have to go through other school shooter drills.”¹⁹ In addressing her comments to all lawmakers who accept NRA money, and in acknowledging that her and other youths’ voices were being heard via Twitter and media interviews, Gonzalez was clearly conveying that her neighbors are not confined to the geographic limits of Parkland or Florida.

In describing how a teacher fosters the habit of citizenship as shared fate, Stitzlein indicates that “[s]tudents would be guided to see how multiple parties are implicated in the causes of the problematic situations.”²⁰ In Gonzalez’s speech, as well as in many of her peers’ responses, we heard the youth demonstrating keen understanding of the complexity of actors in the gun violence epidemic. They spoke of politicians, NRA lobbyists, teachers and administrators, law enforcement officers, and students. As noted, citizenship as shared fate is not detached from history. In speaking of the origins of the Second Amendment, and in referencing past activism and the *Tinker* case, these young people were aware of their past as they looked toward a future.

Stitzlein notes that “[c]itizenship as shared fate helps to create bridges of concern between people even if their geographic homes are far apart.”²¹ The most salient examples of such bridge building were in meetings between MSDHS students and students from Chicago Public Schools. MSDHS students

¹⁸ Stitzlein, 182–183.

¹⁹ CNN Staff, “Florida Student Emma Gonzalez to Lawmakers and Gun Advocates: ‘We Call BS,’” *CNN*, February 17, 2018, <https://www.cnn.com/2018/02/17/us/florida-student-emma-gonzalez-speech/index.html>.

²⁰ Stitzlein, *American Public Education*, 184.

²¹ Stitzlein, 183.

visited with peers in Chicago to help plan the march there, and students from Chicago also travelled to Florida to meet with MSDHS activists.²² While many of the social and economic factors at play in urban communities of color in Chicago are different from those in the predominantly white, gated communities of Parkland, these young citizens were able to understand that they share common concerns around gun violence. Expressions of this shared fate were heard in a Chicago student stating that “what happened in Parkland is injustice, and injustice there is injustice here,” and in a Parkland student’s acknowledging that it is “heartbreaking to know [young people in Chicago have] been feeling this pain and fear for nearly their whole lives.”²³

A narrow focus on the pro-gun-control responses of high-profile students like Gonzalez and Hogg, and their peers in Chicago, is not adequate evidence of the cultivation of citizenship as shared fate and other democratic habits for which Stitzlein calls. Although seemingly smaller in numbers and receiving less media attention, the actions of pro-Second-Amendment students in the months following the Parkland shooting are also manifestations of these same habits. MSDHS student Kyle Kashuv emerged as a vocal safety advocate who was pro-Second-Amendment and who did not advocate for gun control.²⁴ It is imperative that we as educators recognize students’ enacting democratic habits, regardless of the students’ specific messages.

COMMUNICATION

The interactions between the Parkland and Chicago students are also demonstrations of Stitzlein’s second habit, communication. Drawing again on Dewey, Stitzlein states that “communication . . . enables us to make our lives, our experiences, and our ends-in-view common.”²⁵ These students were “*doing ‘public’*” in their “efforts to see experience as others do help [them] to make [this] public more inclusive.” Underscoring the flexible nature of democratic habits, Stitzlein contends that communication needs to respect the contexts of situations and participants in conversations.²⁶ It is perhaps this aspect of democratic communication that was most readily observed among young

²² Rachel Hinton, “Parkland Shooting Survivors Visit CPS Students to Plan Chicago Gun Control March,” *Chicago Sun Times*, March 17, 2018, <https://chicago.suntimes.com/2018/3/17/18399955/parkland-shooting-survivors-visit-cps-students-to-plan-chicago-gun-control-march>; Mary Schmich, “In a Florida Poolside Visit, Chicago Teens Glimpse Parkland Students’ Lives, and Find Gun Violence in Common,” *Chicago Tribune*, March 8, 2018, <http://www.chicagotribune.com/news/columnists/schmich/ct-met-parkland-shooting-chicago-students-mary-schmich-20180308-story.html>.

²³ Hinton, “Parkland.”

²⁴ Alex Daugherty, “A Conservative Parkland Student Helps Set the Agenda in Washington,” *Miami Herald*, March 13, 2018, <https://www.miamiherald.com/news/politics-government/article204946944.html>.

²⁵ Stitzlein, *American Public Education*, 185.

²⁶ Stitzlein, 186

people in the weeks after the shooting. We saw young citizens comport and express themselves in a variety of ways: “calling BS” at a gun-control rally; confronting NRA leadership and politicians with pointed questions on a televised town hall; participating in a listening session at the White House; speaking somberly and observing four minutes of silence at a national march in Washington; tweeting about a poolside meeting between Parkland and Chicago students.

The ability of these youth to successfully adapt their communication to these contexts also highlighted one of the challenges of developing this habit. The MSDHS students in particular come from a predominantly white, solidly middle-class community. We must acknowledge that the manner in which they “speak and listen” reflects this and may aid in their messages being more readily welcomed—by the media, lawmakers, and the broader public—than those of their Chicago peers. We should not focus solely on the success of the MSDHS students’ in making their voices be heard. They were equally successful in their listening to their peers. As educators point to the MSDHS students as exemplars of the democratic habit of communication, they should not reduce this to how the students spoke and should emphasize how the students listened.

ANALYSIS, CRITIQUE, AND DISSENT

Stitzlein presents the habit of dissent as a positive right; schools must develop students’ capacities to enact it. Analysis and critique, necessary habits for dissent, “are dispositions to question and challenge, rather than to accept and obey.”²⁷ The habits of analysis, critique, and dissent were also quite apparent in the actions of young people since the Parkland shooting. Stitzlein distinguishes dissent from cynicism, noting that “dissent pulls [individuals and institutions] together in a community or in a commitment to act.”²⁸ The sustained action last spring was an example of this cohesion through dissent. The habits of analysis and critique were immediately apparent in early interviews and speeches with MSDHS students and others, and it appeared that these were fostered directly in school. Students referenced their courses, specifically Advanced Placement US Government. They researched NRA donations to lawmakers and called them out; they informed themselves of gun purchasing and ownership laws in Florida and elsewhere and pointed to flaws and offered solutions. In going further and organizing protests at the statehouse, the school walkouts, and the March for Our Lives, these young citizens were fulfilling what Stitzlein characterizes as a democratic *duty* to dissent. Stitzlein states that “habits of dissent can lead to the formation of new publics around identified problems . . . [and] pulls [individuals] together . . . in a commitment

²⁷ Stitzlein, 195.

²⁸ Stitzlein, 196.

to act.”²⁹ We see strong potential for this coming together around a problem in the words of Kyle Kashuv, the pro-Second-Amendment MSDHS student, who notes that he and his pro-gun-control classmates want the same end result: safe schools.³⁰ As Stitzlein notes, “the habits of analysis and critique [necessary for dissent] themselves are not politically affiliated.”³¹

COLLABORATION AND COMPROMISE

Schools are not the only setting in which democratic habits can and should be nurtured. We can optimistically believe that the habits discussed above were cultivated both within and outside schools. Or we can cynically point out that there is no way to link them to the students’ schooling and contend that they are simply the results of other circumstances. I lean toward schooling playing a significant part in developing these habits in many of the students, but I acknowledge that establishing clear connections to their schooling requires much more in-depth inquiry. In the lead-up to the March 14 walkouts, however, we were able to observe Stitzlein’s habit of collaboration and compromise—“proclivities to work together, exchange ideas, and build and negotiate solutions”—directly in the schools.³²

The legal consensus on students’ rights to protest in this manner is clear, and teachers and administrators knew that they would not be legally violating students’ free speech rights by disciplining them for walking out. Students leaving classrooms and school grounds in the middle of the school day violates attendance requirements, exceeds unobtrusive symbolic speech, creates significant disruption, and poses safety concerns. Some schools held firmly to their policies and disciplined students for unexcused absences and other policy violations. Others seized on the moment to promote collaboration and compromise, responding to students’ concerns and their needs to express themselves. At the same time these schools shared their own legal and safety concerns. Results varied and some schools let students proceed as planned with the walkout. Others reached compromises that allowed the protest to happen, but students agreed not to leave campus. In many instances, other options were offered for students who chose not to participate in the walkout. Both students and schools needed to compromise on their initial demands.

DELIBERATION

The habit of deliberation Stitzlein supports is not a fixed method, but rather it “reflects an inclination toward figuring out problems alongside others

²⁹ Stitzlein, 196.

³⁰ Alex Daugherty, “Parkland’s ‘Most Hated Pro-Gun Advocate’ Thrills Conservatives,” *Miami Herald*, July 30, 2018, <https://www.miamiherald.com/news/politics-government/article215578485.html>.

³¹ Stitzlein, *American Public Education*, 196

³² Stitzlein, 189.

and through dialogue.”³³ This habit was also seen “in action” during the lead-up to the walkouts. Stitzlein encourages educators to “require students to reach a consensus on how to best handle a real social problem in the school providing children the opportunity to influence policy or practice in the school.”³⁴ Teachers and administrators who worked with students to organize demonstrations, and to provide alternative activities, helped students to enact this habit.³⁵

The presumed role of the school in the first three habits above—shared fate, communication, and analysis, critique, and dissent—took place prior to the student actions. The focus is on student actions. These final two habits—deliberation, and collaboration and compromise—shift us from a student-focused analysis to a school-focused analysis. In these instances, the role of the schools, through teachers’ and administrators’ actions, was ongoing. Bryan Warnick’s ideas provide a good framing to analyze these actions, bearing in mind Blacker’s concerns for the elimination of student voice.

CONSIDERING THE SPECIAL CHARACTERISTICS OF THE SCHOOL ENVIRONMENT

Warnick notes the Supreme Court’s prevailing view, derived from the *Tinker* case that, “students have speech rights, but they are not absolute; instead they may be tailored to educational contexts and to the specific demands of schooling.”³⁶ He identifies seven specific characteristics of the school as a distinct ethical environment, several of which are directly connected to some schools’ actions regarding student protests after the Parkland shooting.³⁷ They help us to see how actions by teachers and administrators may have been ethically warranted and appropriate. At the same time, they shed some light on what may have been problematic about some decisions and how they were enacted.

COMPULSORY ATTENDANCE AND A SEMI-CAPTIVE AUDIENCE

School is one of the only places where people are legally required to be, making students a semi-captive audience with little option to exit.³⁸

³³ Stitzlein, 191.

³⁴ Stitzlein, 193.

³⁵ Stitzlein notes that “Deliberation not only forms publics for and within our schools, but also enables them to reach a consensus on important issues and craft the solutions necessary to address the shared concerns that help publics mature and strengthen” (192–193).

³⁶ Warnick, *Understanding Student Rights*, 2.

³⁷ Warnick, 24–60. The “special characteristics” Warnick identifies and describes are: age of students; semi-captive audience; focus on student safety; public accountability and legitimacy; school-associated nature of much student action; multiple constituencies; and promotion of education goals.

³⁸ Warnick, 36–39.

Warnick notes the potential compromise of an individual’s integrity and the potential harm of misrecognition due to compulsory attendance. The ways in which children publicly express themselves in school may be demonstrations of various aspects of their identities. Threats to the child’s moral personhood are at play; there is a risk of harm to the child’s sense of integrity. “If the state is to require people . . . to be within a space, it must protect the rights of the people to retain their individuality in that space as much as possible.”³⁹ As noted above, teachers and administrators worked with students in the lead-up to protests and walkouts that followed the Parkland shooting, seemingly fostering democratic habits and supporting student speech rights. Yet, in some instances, they may not have adequately attended to the risks to students’ integrity and the potential for misrecognition. A school in Ohio chose not to punish students who participated in the March 14 walkout to protest gun violence, but required students not partaking in the walkout to go to a study hall. A student who opted to do neither and remain in his classroom was suspended for failing to follow teacher instructions.⁴⁰ Within the context of a highly divisive political debate, the students’ reluctance to participate in either option is understandable. The putatively neutral space of the study hall could be perceived by other students as the “anti-gun-control” space. The student would have been forced to make a political statement by being in either space, compromising his own integrity. Obligating him to go to the study hall exposed him to being misrecognized by his peers and teachers.

FOCUS ON STUDENT SAFETY

Related to compulsory attendance and students’ ages, Warnick notes that “schools have special responsibilities to ensure the school environment is safe, and . . . this imperative often is taken to override the general protection of speech rights accorded by *Tinker*.”⁴¹ Similar to Blacker’s assertion cited in my introduction, Warnick observes that “the safety of schools has been cited as a reason—perhaps the strongest reason—to deny students First Amendment rights.”⁴² In the Ohio case, the district indicated that it was their responsibility to keep students safe that prompted them to require students to report to a study hall.⁴³ Warnick references the ways in which promoting free speech among students may enhance student safety, allowing for the mediation of conflicts and the identification of “troubled students” who may commit violence.⁴⁴

³⁹ Warnick, 70.

⁴⁰ Shannon Gilchrist, “Hilliard Student Wasn’t Suspended for Avoiding Gun Protest, but the Internet Doesn’t Believe That,” *The Columbus Dispatch*, March 15, 2018, <http://www.dispatch.com/news/20180315/hilliard-student-wasnt-suspended-for-avoiding-gun-protest-but-internet-doesnt-believe-that>.

⁴¹ Warnick, *Understanding Student Rights*, 39.

⁴² Warnick, 72.

⁴³ Gilchrist, “Hilliard.”

⁴⁴ Warnick, *Understanding Student Rights*, 74.

The post-Parkland context of calls for gun control inserts an ironic dynamic into the consideration of this focus on student safety. Students who walked out of schools were not identifying imminent threats from a fellow classmate within the school. Rather, their speech was addressing systemic issues that compromise schools' ability to meet their obligations to keep students safe. Administrators in many schools, however, used the need to keep students safe—the very thing students were attempting to speak out about—as a rationale for threatening and carrying through on punishment for those who walked out.

THE NEED TO PROMOTE EDUCATIONAL GOALS

The most important special characteristic of schools, Warnick asserts, “is that they are supposed to be places where learning takes place in the pursuit of certain educational goals.”⁴⁵ Further, in any context where student speech rights are limited, based on any of the special characteristics, it should be done in an educational way.⁴⁶ In considering how schools responded to student activism in the wake of Parkland, it is important to consider whether any restrictions on student free speech were enacted in an educational way. In the case of the Ohio student, sending students to a study hall did not seem to be educational. It was purely a safety, or more accurately, a liability issue. The school could have offered a third option such as a forum to discuss the history of Court decisions on student speech, as well as related issues such as the Second Amendment. Such educational responses were in place in some other schools where walkouts were not allowed (with the threat of suspension) but structured educational programming around the relevant issues was provided.

Considering educational ways to address limits to student free speech prompts us to consider what is an educational activity. Warnick notes that process-oriented censorship, which would include discouraging hundreds of students leaving class and walking out in the middle of the school day, is not controversial since it interferes with school activities.⁴⁷ Unfortunately, in an era of extreme accountability and high-stakes testing, every minute of classroom instruction is perceived as indispensable. This narrows our conception of what constitutes an educational experience. If we embrace Stitzlein's concept of forming democratic citizens as a critical purpose of schools, then we must recognize that this does not just take place in the formal classroom setting. Given the fact that the walkouts were scheduled ahead of time, there was ample time for schools to work with and around them.

Warnick acknowledges the complexities involved in these situations, as well as the competing aspects among different characteristics of schools. He does not present a simple, easy answer to be applied in every situation, and

⁴⁵ Warnick, 51.

⁴⁶ Warnick, 91–96.

⁴⁷ Warnick, 80.

notes that each situation necessitates probing questions.⁴⁸ While I focus on just a few of them in this paper, Warnick's *educational criterion* for speech rights requires that we "seek to mediate the tension among all the relevant special characteristics."⁴⁹ Further analysis might consider, for instance, whether parents' perspectives or the age of the students should have been a mediating factor in how teachers and administrators at different schools engaged with student activism.

CONCLUSION

Blacker raises a concern that an elastic conception of the mission of schools threatens student free speech. Student activism in the wake of the Parkland shooting provides a case to analyze the current state of student voice. Through Stitzlein's framing of habits of democracy, we see indications of success on the part of schools in cultivating these ways of living, both prior to and in the aftermath of the Parkland shooting. This counters Blacker's assertion that educators should focus their activism outside the educational system.⁵⁰ Through Warnick's special characteristics, we also see that decisions on the part of teachers and administrators to limit student speech can be ethically justified within the unique context of the school. The manner in which some schools mediated student speech rights, however, does not satisfy Warnick's educational criterion, reminding us that Blacker's concerns over elimination of student voice are not to be dismissed. It is not clear how much the containing of walkouts to school grounds may have altered what individual students said or expressed, or whether students were disciplined for specific speech at some of these events. As we celebrate the manifestations of democratic habits among students after the Parkland shootings and affirm the educational rationales for limiting some student speech, we must remain attentive to the real threats to student voice. This paper can serve as a debrief of actions post-Parkland, but should also serve as a prompt for educators to consider how to prepare for and engage educationally in future situations.

⁴⁸ Warnick, 91. This is similar to Stitzlein's emphasis on habits of democracy being about *how*, rather than *what*, we decide.

⁴⁹ Warnick, 95.

⁵⁰ Blacker, *The Falling Rate*, 228.
