

2023

## Administrative Use of Prior Review in High School Journalism Programs

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# Walden University

College of Education and Human Sciences

This is to certify that the doctoral study by

Pedro J. Cabrera

has been found to be complete and satisfactory in all respects,  
and that any and all revisions required by  
the review committee have been made.

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Walden University

2023

Abstract

Administrative Use of Prior Review in High School Journalism Programs

by

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MA, Sam Houston State University, 2015

BA, Texas State University, 2011

Dissertation Submitted in Partial Fulfillment

of the Requirements for the Degree of

Doctor of Education

Walden University

August 2023

## Abstract

In *Hazelwood v. Kuhlmeier* (1988), the U.S. Supreme Court established that school administrators have the right to review, change, or remove student-created media if the school sponsors it and if the school administrator has a “legitimate pedagogical interest,” which has been inconsistent across high school student-created media in a metro area of a southern region in a southwestern state. Because of the vagueness, the administration can review, change, or remove student-created media based on personal social, cultural, ethical, or political beliefs. The purpose of this basic qualitative research was to examine how campus administrators determined “legitimate pedagogical interest.” Gatekeeping theory explains that forces may either constrain or facilitate the passage of information through the gatekeeping process. The research question addressed how administrators determined “legitimate pedagogical interest” in their decision to use prior review or prior restraint. Data collection occurred through semistructured one-on-one virtual interviews. The analysis included transcribing, coding, and analyzing the interviews. Based on the data, participants said that determining “legitimate pedagogical interest” was ensuring that student-created media was factual, was unbiased, and aligned with district and state curriculum standards. Administrators decided to initiate prior review or prior restraint because of the community, politics and current events, and district forces. Positive social change may result from exploring the understanding behind administrative use of prior review on high school journalism programs and understanding the factors that affect administrators.

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## Dedication

I dedicate this dissertation to every little boy and girl of color, especially those in the LGBTQIA+ community, who are told they could not, should not, or would not.

You can. And you should.

## Acknowledgments

This academic journey represents every statistic that suggests it could not be possible. It is because of my chosen family, close friends, guidance from professional and personal inspirations, and the commitment of my committee chairs, Dr. Kathleen Kingston and Dr. Felicia Blacher-Wilson, that I am in this position.

Many people - from different corners of the universe - have had a part in my success. Each one deserves a personal and individual acknowledgment. You did not give up on me. You did not leave me. For that, I may never have the right words to show the gratitude I have for each of you.

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## Chapter 1: Introduction to the Study

In *Hazelwood v. Kuhlmeier* (1988), the Court established that school administrators have the right to review, change, or remove student-created media if the school sponsors it and if the school administrator has a “legitimate pedagogical interest” in preventing the publication of articles. Because of the vagueness of “legitimate pedagogical interest,” the administration can review, change, or remove student-created media based on personal social, cultural, ethical, or political beliefs. Both advisers and students have experienced routine censorship from administrators that puts information, careers, and publications at risk (Farquhar & Carey, 2018). Because that standard differs from administration to administration, this research explored how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. Positive social change may result once understanding of administrative use of prior review on high school journalism programs is explored and factors that affect administrators are understood. In this chapter, I will discuss the background of the study and establish the problem statement, the purpose of the study, the research question, the conceptual framework, the nature of the study, key definitions, any assumptions, the scope and delimitations, the significance of the study, and any positive social change that may be a result of the study.

### **Background**

In 1965, a group of students in Des Moines, Iowa formed a plan to protest the Vietnam War by wearing black armbands. When the plans became known, school administrators created a policy announcing that students wearing armbands in school

would be suspended until they agreed to remove the armband (Driver, 2020). John Tinker wore his band through lunchtime before he was addressed by a teacher. His sister, Mary Beth Tinker, wore her band for the entire day until a teacher brought attention to it. The Tinkers, along with three other students, were eventually suspended. They returned to class in January when the scheduled protest ended (Driver, 2020). The students later filed a lawsuit, asserting that their suspensions violated their First Amendment right of free expression, thus setting up the *Tinker v. Des Moines* (1969) Supreme Court case. Justice Abe Fortas issued the majority's opinion, which mentioned, "it can hardly be argued that ... students ... shed their constitutional rights ... at the schoolhouse gate" (*Tinker v. Des Moines*, 1969). This case has been used in subsequent course cases to defend students' constitutional rights.

In the late 1980s, students in a journalism class chose to write two articles—one concerning pregnancy in school and another discussing divorce. The principal felt the article's mention of sexual activity and birth control were unsuitable for some younger students (Hudson, 2018). As the school year ended, the principal did not have time to edit both articles—he simply decided to not allow the two articles to be printed (Strasser, 2017). The three students sued, claiming that their First Amendment rights had been violated. Although the Eighth Circuit sided with the students, noting that the school newspaper had been labeled a "public forum," the Court disagreed, stating that school officials were entitled to regulate the contents in any reasonable manner (*Hazelwood v. Kuhlmeier*, 1988). Given that the removal of the articles was deemed "a reasonable

manner” and that the school newspaper was a part of the school’s curriculum, the student’s First Amendment rights were not violated (Strasser, 2017). The Court said,

School must be able to set high standards for the student speech that is disseminated under its auspices—standards that may be higher than those demanded by some newspaper publishers or theatrical producers in the “real” world—and may refuse to disseminate student speech that does not meet those standards. (*Hazelwood v. Kuhlmeier*, 1988)

The *Tinker* decision concluded that students do not shed their free speech rights in school. However, the *Hazelwood* decision allowed school administrators to restrict speech, establishing prior review and prior restraint. *Prior review* occurs when anyone not on the student media staff requires that they be allowed to read, view, or approve student material before distribution, airing, or publication (Ewell et al., 2019). *Prior restraint* occurs when someone not on the student media staff requires predistribution changes to or removal of student media content (Ewell et al., 2019). Because the standard to use prior review and prior restraint differs from administration to administration, I attempted to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media.

### **Problem Statement**

The problem is that the standard by which high school administrators determine “legitimate pedagogical interest” in using prior review and prior restraint is inconsistent across high school student-created media. *Tinker v. Des Moines* (1969) established the

Tinker Standard, which ruled that “it can hardly be argued that ... students ... shed their constitutional rights ... at the schoolhouse gate.” However, in *Hazelwood v. Kuhlmeier* (1988), the Court established the Hazelwood Standard, which stated that principals have the right to review, change, or remove student-created media if the school sponsors it and if the school administrator has a “legitimate pedagogical interest” in preventing the publication of articles.

The administrative use of prior review can result in the censorship of student work (Strasser, 2016). Research shows that student journalists and advisors experience routine censorship from administrators that puts information, careers, and publications at risk. Research also suggests that many threats are not made public because advisers of those organizations fear professional retaliation (Farquhar & Carey, 2018). Using prior review policies may increase student self-censorship out of fear of academic consequences for bringing attention to controversial topics (Farquhar & Carey, 2018).

In May 2018, a journalism teacher’s contract in a large southwestern city was not renewed after an article written and published by a student was taken down from the online newspaper platform by the principal (Dieterich & Greschler, 2019). In May 2019, a journalism teacher in a small southwestern city resigned after a lengthy conflict with the school administration, which originated over how the yearbook should cover lesbian, gay, bisexual, transgender, and queer content. Because of this issue, the principal changed the campus policy from the yearbook *not* being required to be prior reviewed to the yearbook being subject to prior review (Dawson, 2019). In September 2022, a journalism teacher in a large urban city was issued a suspension for 3 days without pay over a student-created

article about employees who declined to follow the district's COVID-19 vaccine mandate (Martinez, 2022). Because that state has laws protecting student-created media, the teacher appealed the suspension and won. In 2022, the Student Press Law Center found that more than half of the schools in a state that has protections for student-created media were in violation of the law by not having a policy in place (Student Press Law Center, 2022). As of 2022, there were 17 states that had laws in place that protect student-created media from being reviewed, changed, or removed by high school administrators (Norins et al., 2021).

In the largest school district in a metro area of a southern state, the district policy states,

all publications edited, published, and distributed in print or electronically in the name of the District or an individual campus shall be under the control of the campus and District administration and the Board. All school-sponsored publications approved by a principal and published by students at an individual campus shall be part of the instructional program, under the supervision of a faculty sponsor.

Farquhar and Carey (2018) suggested that factors towards prior review can depend on an institution's location and community influence.

Although the value of scholastic journalism education for student composition and critical thinking skills has been researched (Bobkowski & Belmas, 2017; Bobkowski & Cavanah, 2019; Neely, 2015), I attempted to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior



review or prior restraint on high school student-created media. This study focused on a southern region of a southwestern state that does not have statewide protections for student journalists (Listopad & Crawford, 2018).

### **Purpose of the Study**

The purpose of this basic qualitative research was to examine how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. Because journalism programs may be supported using school funds, the impact of the *Hazelwood* case is significant. Not only does the administrative ability to review, change, or remove student-created media undermine student journalists’ First Amendment rights, but censoring student journalism erodes civic engagement (Listopad & Crawford, 2018). Because different geographical regions and communities produce different ideologies, an increased understanding of the use of prior review specifically in a southwestern state needs to be pursued (Farquhar & Carey, 2018). Within this qualitative study, I attempted to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media.

### **Research Question**

RQ1: How do administrators determine “legitimate pedagogical interest” in their decision to use prior review or prior restraint?

### **Conceptual Framework**

Gatekeeping theory, as proposed by Lewin (1947), explains that forces influence the passage of information through the gatekeeping process (Cassidy, 2006; Lewin,

1947). The gatekeeper decides what information is disseminated. Therefore, the gatekeeper influences the school community socially, culturally, ethically, and politically based on their personal beliefs. Through this process, the gatekeeper removes unwanted, sensitive, and controversial information. Although there is literature to explain how Gatekeeping theory impacts media entities (Paskin, 2018), this study applied the same theory in an education context. The administrator overseeing journalism plays the role of the gatekeeper (Cogar, 2021). If the student is aware of the administrator's stances on specific issues, it may lead to the student's self-censoring to avoid passing through the gatekeeper (Nicolini & Filak, 2022). The theory was used to attempt to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media.

### **Nature of the Study**

Qualitative researchers examine how individuals or groups perceive a phenomenon in their environments and make meaning through their experiences (Ravitch & Carl, 2016). Qualitative researchers view participants as experts on their own experiences and utilize data from individual perceptions to understand their relationship to the phenomena (Ravitch & Carl, 2016). Therefore, because high school administrations' choices can differ based on a wide variety of variables, a basic qualitative approach was appropriate in this study because it allowed participants to provide rich, specific, contextual, and unstructured data through semistructured interviews.

Researchers using a qualitative approach attempt to understand individuals or groups in their natural settings in ways that are contextualized and reflect the meaning that people make out of their own experiences (Ravitch & Carl, 2016), which is key in determining what standard a high school administrator applies prior review or prior restraint, and in what situations this occurs. More so, there are several key components of qualitative study that made it ideal for this study. First, it allows for descriptive and analytic observation, which means that researchers are interested in understanding, describing, and ultimately analyzing, in detailed and deeply contextualized ways, the complex process, meanings, and understandings that people have and make within their experience, context, and milieu (Ravitch & Carl, 2016). Second, it involves seeking complexity and contextualization of how reality exists and unfolds in ways that are temporal, contextual, and highly individualized, even as participants may share certain experiences and perspectives (Ravitch & Carl, 2016). Third, qualitative research allows the researcher to be the primary instrument, meaning that the subjectivity, social location/identity, positionality, and meaning-making of the researcher shape the research in terms of its processes and methods and therefore shape the data and findings (Ravitch & Carl, 2016). Lastly, qualitative researchers pay close attention to processes and relationships, meaning that there is an intentional focus on how the research process itself generates meaning and important frames for understanding data (Ravitch & Carl, 2016).

The concepts that investigated in this study were prior review, prior restraint, and gatekeeping. *Prior review* occurs when anyone not on the student media staff requires that they be allowed to read, view, or approve student material before distribution, airing,

or publication (Ewell et al., 2019). *Prior restraint* occurs when someone not on the student media staff requires predistribution changes to or removal of student media content (Ewell et al., 2019). Gatekeeping theory explains that forces influence the passage of information through the gatekeeping process (Cassidy, 2006; Lewin, 1947). The gatekeeper decides what information is disseminated. Therefore, the gatekeeper influences the school community socially, culturally, ethically, and politically based on their personal beliefs. According to Shoemaker and Vos (2009), *gatekeeping* is the “process of culling and crafting countless bits of information into the limited number of messages that reach people every day, and it is the center of the media’s role in modern public life” (p. 1). Through this process, the gatekeeper removes unwanted, sensitive, and controversial information. Because the standard for "legitimate pedagogical interest" differs from school to school, positive social change may result from exploring the understanding behind administrative use of prior review on high school journalism programs and understanding the factors that affect administrators. This study can help to establish policies that benefit students, journalism teachers, school administrations, and the discipline, which may advance the understanding of scholastic journalism.

The target population was high schools with student-created media in a southern region of a southwestern state. The ideal sample for this study was eight to 10 high school administrators. Participants were chosen based on (a) if their school had student-created publications, which might include a yearbook, newspaper, broadcast, or any student-created media, and (b) if the administrator had at least 2 years of principalship experience. Data were collected through semistructured interviews. Semistructured

interviews were conducted to gather data on each principal's unique and specific experiences in their prospective settings (Ravitch & Carl, 2016). The data was analyzed through transcribing and coding.

### **Definition of Terms**

The following terms were used in the study:

*Prior review* occurs when anyone not on the student-media staff requires that they be allowed to read, view, or approve student material before distribution, airing, or publication (Ewell et al., 2019).

*Prior restraint* occurs when someone not on the student-media staff requires predistribution changes to or removal of student media content (Ewell et al., 2019).

*Gatekeeping* can be defined as the “process of culling and crafting countless bits of information into the limited number of messages that reach people every day” (Shoemaker & Vos, 2009, p. 1).

### **Assumptions**

The first assumption was that administrators understand the First Amendment in relation to student speech. The second assumption was that the participants had knowledge of the *Hazelwood* case, in terms of prior review and prior restraint. The third assumption was that participants had a journalism program that produced at least one student-created publication. The fourth assumption was that participants may have used prior review or prior restraint at some point in their careers as an administrator.

### **Scope and Delimitations**

The problem is that the standard by which high school administrators determine “legitimate pedagogical interest” in using prior review and prior restraint is inconsistent across high school student-created media. This study was limited to high school administrators who oversaw at least one student publication as a part of the campus’s journalism program. In the southern region of the southwestern state, journalism is a discipline that is specific to a high school setting. Therefore, no other level of school administration was addressed in this study. The population excluded from this study was all other school personnel who do not oversee high school journalism programs.

This study also focused on student speech and administrative use of prior review and prior restraint because of the increased complexity of free speech. Student speech is more complicated now than speech communicated via a poster, an assembly speech, or even an armband (Herrmann, 2018). Now, student speech can take place almost anywhere at any time and through multiple channels. This study will help in better understanding administrative decisions in relation to student-created media.

Transferability is how qualitative studies can be applicable, or transferable, to a broader context while still mainlining their context-specific richness (Ravitch & Carl, 2016). Because the standard of "legitimate pedagogical interest" differs from school to school and the understanding behind administrative use of prior review and prior restraint on high school journalism is explored, positive social change may result when factors that impact administrators are understood. The practices of administration can be useful for administrators and advisers on similar campuses trying to improve scholastic journalism

programs. Knowledge of the principal's choices can increase transparency between administrators, teachers, and students regarding student-created media. This study can also help to establish policies that benefit students, journalism teachers, school administrations, and the discipline, which may advance the overall understanding of scholastic journalism.

### **Limitations**

There were some limitations to this study related to the design and methodology. A researcher needs to maintain constant and systematic awareness of both components to confront bias, underlying beliefs, and assumptions that stem from the researcher's own experiences (Ravitch & Carl, 2016). I spent 9 years as an adviser of student media in the southern region of the southwestern state. I am a member of state and national academic scholastic journalism associations. This was addressed by not disclosing my work history and related associations when contacting administrators. To address the integrity of the study and any bias, participants were chosen solely from neighboring school districts, rather than the school district where I am employed.

### **Significance**

The problem is that the standard by which high school administrators determine "legitimate pedagogical interest" in using prior review and prior restraint is inconsistent across high school student-created media. It allows administrators to act if they find "legitimate pedagogical concerns," which it is up to the administrator to determine (Nevin, 2015). Because "legitimate pedagogical concerns" differ from school to school, I attempted to fill the gap in practice by exploring how high school administrators

determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media.

This study is important for social change and is relevant to educational communities because the role of student speech and the First Amendment has changed a great deal in the 50 years since *Tinker*. Now, student speech can take place almost anywhere at any time and through multiple channels. The Journalism Education Association (2015), the largest journalism teachers' association in the United States, has called student self-censorship widespread and destructive to students' ability to learn authentic journalism. More so, journalism teachers know that censorship is possible, so they may not assign proper instructional materials. They may feel punishment, threats, and possible termination ahead of themselves (Norins et al., 2021).

The purpose of this basic qualitative research was to examine how campus administrators determine "legitimate pedagogical interest" when using prior review or prior restraint on high school student-created media. Teaching scholastic journalism in secondary education is urgent because of the rapid changes within and outside the profession and discipline, with constant changes to information gathering and technology (Simons et al., 2017). Positive social change may result from understanding administrative use of prior review on high school journalism programs and factors that affect administrators. This study can help to establish policies that benefit students, journalism teachers, school administrations, and the discipline, which may advance the knowledge of scholastic journalism.



## Summary

The problem is that the standard by which high school administrators determine “legitimate pedagogical interest” in using prior review and prior restraint is inconsistent across high school student-created media. The purpose of this basic qualitative research was to examine how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. Previous research indicated that the administrative ability to censor undermined student journalists’ First Amendment rights and eroded civic engagement (Listopad & Crawford, 2018). Because “legitimate pedagogical concerns” differ from school to school, I attempted to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media. In Chapter 2, I will review literature related to historical judicial context, scholastic journalism, gatekeeping, student censorship, and administrative leadership.

## Chapter 2: Literature Review

The problem is that the standard by which high school administrators determine “legitimate pedagogical interest” in using prior review and prior restraint is inconsistent across high school student-created media. Because “legitimate pedagogical concerns” differ from administration to administration, I attempted to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media. The purpose of this basic qualitative research was to examine how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. In this chapter, I review literature related to judicial precedent, scholastic journalism, student censorship, and the administration's role in gatekeeping. It begins with an explanation of the strategy used for searching the literature and a detailed description of the conceptual framework.

### **Literature Search Strategy**

The search strategy for the review of the literature involved the use of databases and education search engines, including EBSCO, Thoreau, Sage, and Google Scholar. Key terms used to locate literature were *Hazelwood*, *Kuhlmeier*, *Tinker*, *Des Moines*, *Supreme Court*, *prior review*, *prior restraint*, *gatekeeping theory*, *high school journalism censorship*, *media literacy*, *civic engagement*, *student voice*, *journalism education*, *school leadership*, *administrative leadership*, *democratic leadership*, and *participative leadership*.

### Conceptual Framework

As proposed by Kurt Lewin in 1947, Gatekeeping theory explains that forces influence the passage of information through the gatekeeping process (Cassidy, 2006; Lewin, 1947). The theory has been used heavily in mass communication research (Steele, 2018). An important aspect of Lewin's theory is the idea that forces determine whether an item passes through a gate. With gates controlling access to all sections within all channels, forces are at work throughout the channels (Shoemaker & Vos, 2009; Steele, 2018). Gates are decision or action points. Gatekeepers determine which units get into the channel and which pass from section to section, exercising their preferences and/or acting as representatives to carry out a set of pre-established policies. They also decide whether to make changes to the item (Shoemaker & Vos, 2009; Steele, 2018). According to Shoemaker and Vos (2009), in terms of media, *gatekeeping* is the "process of culling and crafting countless bits of information into the limited number of messages that reach people every day, and it is the center of the media's role in modern public life" (p. 1).

Information messages travel via spoken and written word, through traditional formats such as books and letters, or more modern formats, such as emails and social media messages. Information messages are intentionally spread by channels through "gates" and are received by the public (Steele, 2018). The public, as receivers of information messages, can either be specific to a certain community or organization or can act as the public (Steele, 2018). Communication channels are pathways along which information messages move as they travel from sender to receiver. Regarding

communication, information messages travel along channels such as telephone, mail, email, and more recently, social media (Steele, 2018).

The concept of forces addresses the notion that there are factors that influence whether information is allowed to flow through a gate or is stopped at the gate. These factors influence gatekeepers' decision-making on gate control. Factors are either positive in nature, supporting continued flow through the gate, or negative in nature, resulting in the closure of the gate and impedance of information flow (Steele, 2018).

There are at least four issues involving forces that Lewin (1947) did not address:

1. The first forces may retain their polarity (e.g., remain positive) after passing through a gate. The more newsworthy an event is (positive force), the more likely it is to pass through the first news gate (Shoemaker & Vos, 2009).
2. The second issue is that forces may vary in strength, some conflicting with others. Strong forces should, by definition, have more of an effect on the movement of items past gates and through channels than weak forces (Shoemaker & Vos, 2009).
3. A third issue is that forces may have a bidirectional influence through a gate. The number of items in front of or behind the gate may affect the strength of forces that act on them (Shoemaker & Vos, 2009).
4. The fourth issue is that differing forces and polarities affect the entire gatekeeping process, not just selection. Not only should items with a positive force be more likely to be selected (pass through the gate), but they should also be shaped in an attractive or attention-getting fashion, get more coverage,

be timed to attract the largest audiences, and be repeated (Shoemaker & Vos, 2009).

Gatekeeping can be challenging at different levels because of many factors, such as political views and personal beliefs or institutional views and beliefs (Steele, 2018). Gatekeeping theory, commonly used in mass communication, can also translate to journalism classrooms. At the individual level, which in this study's case is the student, a student might not report on an assigned topic because of their own beliefs or might self-censor because of the beliefs of the organization or the community. At the organizational level, which in this study's case is the administrator, the administrator gatekeeps based on the policy of the school or district, the culture of the community, or personal beliefs or opinions. At the social level, gatekeeping occurs when the student's work does not reflect the community's culture (Steele, 2018).

Although there is literature to explain how Gatekeeping theory impacts media entities (Paskin, 2018), this study applied the same theory in the education context. The campus administrator overseeing journalism plays the role of the gatekeeper. If the student is aware of the administrator's opinion on specific issues, it may lead to the student self-censoring to avoid passing through the gatekeeper (Nicolini & Filak, 2022). In journalism classrooms, the material students write or photos students take eventually travel through communication channels (student newspaper, yearbook, or broadcast) or gate. The gate is the key component—gates are decision points along communication channels, which come in the form of people, policies, or other forces. At each gate, information is either allowed to continue to flow or stops (Steele, 2018). It either opens to

allow the information to pass through or distribute or closes and restricts the information from spreading. In essence, the administrator can dictate information from students to the community. The theory was used to attempt to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media.

### **Literature Review Related to Key Variables and Concepts**

#### **Historic Judicial Context**

Two Supreme Court cases have influenced how journalism is taught in America. *Tinker v. Des Moines Independent School District* (1969) set the standard that "it can hardly be argued that ... students ... shed their constitutional rights ... at the schoolhouse gate," while *Hazelwood v. Kuhlmeier* (1988) introduced the use of prior review and prior restraint by school administrators if they can establish "legitimate pedagogical interest." Although one sets up the idea that students have free speech within reason, the other gives school administrators the right to review, change, or remove it.

#### ***Tinker v. Des Moines Independent School District (1969)***

In the *Tinker* case, a group of adults and students in Des Moines planned a protest against the Vietnam War. The students determined the best way to display this protest was to wear black armbands from December 16 to the new year (Bohannon, 2020). They planned to advertise their efforts in the school newspaper; however, the high school censored the advertisement. The principals later met to enact a rule, dictating that students were not allowed to protest, and those who did would be suspended (Bohannon, 2020). Mary Beth Tinker and her brother John, Christopher Eckhardt, Bruce Clark, and

Christine Singer came to their respective schools wearing the armbands and were suspended after refusing to take off their armbands. After consulting with the American Civil Liberties Union (ACLU), the families of Tinker and Eckhardt filed lawsuits against the school district for violating the students' First Amendment free speech rights (Bohannon, 2020).

The U.S. District Court initially dismissed the case in September 1966. With the help of the ACLU, the Tinkers and Eckhardts appealed the case to the Supreme Court, which issued a decision in 1969. The Court voted in favor of the Tinkers and Eckhardts by a 7–2 vote. In the case, the justice wrote, “it can hardly be argued that ... students ... shed their constitutional rights ... at the schoolhouse gate” (*Tinker v. Des Moines*, 1969).

#### ***Hazelwood v. Kuhlmeier* (1988)**

In the second case, *Hazelwood v. Kuhlmeier*, students in a journalism class at Hazelwood East High School in St. Louis, Missouri, wrote articles about teen pregnancy and divorce. Robert E. Reynolds, the school principal, found the two articles inappropriate (Hudson, 2018). The principal eventually pulled the articles from publication. Claiming that the school violated their First Amendment rights, the students took their case to the U.S. District Court for the Eastern District of Missouri (Hudson, 2018). The court ruled that the school had the authority to remove articles that were written as part of a class. The students eventually appealed to the U.S. Supreme Court (Hudson, 2018).

In a 5–3 ruling, the Court ruled that the principal's actions did not violate the students' free speech rights. The Court ruled that, because the school sponsored the

paper, the school had a legitimate interest in preventing the publication of the articles. The Court also ruled that the school newspaper was not intended as a public forum where everyone shared views, but rather a limited forum for journalism students to write articles that were subject to school editing (*Hazelwood v. Kuhlmeier*, 1988). While the case included concerns over the subject matter, confidentiality, and potential libel, the law extended prior restraint to any extracurricular activities in school, provided that the prior restraint could be attributed to the benefit of the learning environment (Ienatsch, 2018). While the *Tinker* case was the beginning of students' voice in education and *Hazelwood* was a continuation of it, numerous court cases have addressed the sometimes-contentious relationship between a school's administration and student speech: *Bethel v. Fraser* (1986), *Dean v. Utica* (2004), *Morse v. Fredrick* (2007), *Bell v. Itawamba* (2012), and *Mahanoy Area School District v. B.L.* (2021).

### **Scholastic Journalism**

The United States has deemed journalism vital in the overall process of representative democracy—it is the only profession mentioned in the U.S. Constitution (U.S. Const. amend. I). High school journalism programs and student-created media exist in varied forms, including print and online newspapers, news magazines, yearbooks, literary magazines, broadcasts, and podcasts (Cybart-Persenaire & Literat, 2018). Approximately 11,000 print newspapers are produced in U.S. public high schools annually, and 88% of high schools offer a journalism or publications course (Cybart-Persenaire & Literat, 2018; LoMonte, 2012).



Journalism's role in society is more important than ever before. Developing student journalists and instilling in them the proper knowledge and skills to fulfill an essential democratic purpose are vital for journalism teachers (Bobkowski & Belmas, 2017; Bobkowski & Cavanah, 2019; Coleman et al., 2018; Listopad & Crawford, 2018). High school journalism students are about 2.5 times more likely to major in journalism/mass communication in college than their nonjournalism counterparts (Coleman et al., 2018). Educators need to appeal to students' sense of self-realization, altruism, and desire to leave a lasting impression.

A variety of skills are taught in journalism programs, focusing on the basics of journalism skills, news judgment, writing, and reporting (Listopad & Crawford, 2018). High-order skills such as self-direction, problem-solving, critical thinking, cooperation, confidence, and responsibility, which are desirable traits to employers, are taught in journalism programs (Vogts, 2018). Journalism education can counter the negative effects technology has on communication by instructing students how to effectively use the tools and express themselves professionally without allowing some sort of slang to pervade messages when such communication is not appropriate (Vogts, 2018). Students embrace the use of cell phones as “tools of the trade” in the production of content, emphasizing how helpful mobile devices are for preparing the school newspaper, especially given their possible lack of access to computers, both in school and at home (Cybart-Persenaire & Literat, 2018). Students rely on their cell phones to take photos, record interviews, or jot down notes and article drafts. Students often use their phones—in class and on the go—to look up vocabulary, definitions, and statistics because they do

not have access to print dictionaries, calculators, or reference materials. Students use cell phones during class time to retrieve information from sources who respond almost immediately (Cybart-Persenaire & Literat, 2018).

Vogts (2018) focused on the role of scholastic journalism in student development, specifically on political awareness, connection to the community, academic performance, social relationships, news consumption, and journalistic knowledge. The researcher conducted a qualitative study that supported the conclusion that students need exposure to the foundations of quality journalism to write effectively and think critically (Vogts, 2018).

The use of prior review on journalism programs can be destructive to the program's ultimate purpose (Liu, 2022; Nelson, 1974). Providing young people with opportunities to experience themselves as a part of a collective is an important aspect of socialization. High school journalism programs provide that opportunity. Students discuss their work with a sense of personal purpose and fulfillment, a sense of connection to their larger high school community, and in many cases a concern for how the rights and experiences of those in their community are respectfully addressed (Coleman et al., 2018; Schofield Clark & Monserrate, 2011). Participation in extracurricular activities, such as student media and journalism, has positive effects on academic standing, reduces stress, improves physical health, increases spirit within the school, allows students to contribute positively to the campus and the wider community, and provides new opportunities and challenges to explore (Buckley & Lee, 2021).

### ***Media Literacy***

Part of journalism education is introducing students to proper media literacy. The U.S. National Association for Media Literacy Education defines media literacy as “the ability to access, analyze, evaluate, create, and act using all forms of communication” (Bulger, 2018, p. 3). As media continues to transform and develop using a wide variety of platforms, young people need to become accustomed to these channels. They are exposed to an onslaught of information, technology, and media at a young age. Familiarity with the media is often linked to a higher level of media literacy (Jones-Jang et al., 2021).

Media literacy may be embedded in social studies education, which is relevant to social science for several reasons. Students are often asked to use media content that provides primary information about historical and current events (Zhang et al., 2020). It should enable students to manage all forms of media and develop students to be informed and critical of mass media, specifically to increase understanding of how it works, how it is organized, and how it can construct reality. It should also attempt to allow students to create media products (Zhang et al., 2020).

Kahne and Bowyer (2019) found that promoting media literacy, specifically on online culture, increases civic engagement among young people. Their study drew upon data from two waves of the Youth and Participatory Politics (YPP) Survey. The survey included multiple measures of political engagement and indicators of learning opportunities in both in-school and nonschool settings related to supporting digital engagement literacies. It supported the value of media literacy in the overall involvement of developing students (Kahne & Bowyer, 2019).

Media literacy education can also help people fight against “fake news” and the spread of misinformation (Dell, 2019). When administrators implement policies that contradict the purpose of the fundamental purpose of the course, they may hinder the longterm impact of a student's media literacy. Students with media literacy education can evaluate media messages and figure out the truth, possible bias, or even possible “fakeness” about said information (Dell, 2019). Literacy instruction needs to change, reframed, and the definition expanded to include new modes of communication, including social media. The goal is to encourage critical thinking regarding media content, and practices have been closely associated with media literacy education. It is generally effective and this effectiveness improves as instructional time increases (McNelly & Harvey, 2021).

Ultimately, the conversation lies with the role of high school journalism programs and student-created media instilling the proper skills necessary to develop and disseminate media (Bulger & Davison, 2018), possibly shielding them from negative or controversial topics versus accurate journalism education which instills proper and ethical media literacy skills. Students must learn to critically read media texts, aim at social justice, and grasp the political, economic, historical, and social contexts within which all messages are written and read. Educators and researchers are tasked to engage in a new type of literacy education, from preschool to higher education that incorporates new information communication technologies, media, and popular culture (Kellner & Share, 2007; Ligocki & Wilkins, 2020). However, schools are more likely to adopt only

information technology or information literacy, and not critical media education (Share et al., 2019).

### ***Civic Engagement***

Democracies thrive when open and honest discussions of all ideas, laws, and policies are allowed and dissent and criticism are welcome (Moore, 2018). Educators and students should be free to examine any controversial and complex topic, including all religious traditions and political ideologies rationally where they have access to all relevant materials and diverse viewpoints and scholars are committed to the objective pursuit of knowledge (Moore, 2018). When young people develop purpose through high school activities, they are more likely to commit to goals they have set longterm, because they have found meaning in those activities (Moore, 2018). Youth engagement in extracurricular programs has been shown to promote commitment to civic participation, particularly when such programs challenge students in settings where social bonds with adults and like-minded peers are formed (Cambell, 2019). Purposeful young people see their activities and shorter-term goals as part of a larger picture of how they matter in the world and what role they will play in the world (Moran, 2020).

For educators wishing to cultivate a mindset of civic engagement among students, utilizing a civics model which students are given opportunities to engage in meaningful conversations about topics they care about ought to be a pedagogical option.

Additionally, educators should seek ways to provide face-to-face interactions with individuals who are actively engaged in civic life, as well as opportunities for students to participate in authentic civic activities (Quinn & Bauml, 2018). Before students reach

voting age, they are most likely to find opportunities for political involvement at school (Royet et al., 2019; Malin et al., 2017). These opportunities show commitment from students - from time to willingness to learn a new skill. Specifically, high school journalism students express a strong advocacy of civic engagement and express a connection between civic engagement and journalism skills. Students feel being civically engaged enhanced their journalism skills and made them more aware of their surroundings, which in turn gave them inspiration for ways to cover their local communities (Bobkowski & Rosenthal, 2022).

Similarly, a journalism education may contribute disproportionately to the civic engagement of socioeconomically disadvantaged youth. Journalism programs empower urban and minority youth to use media to address key community issues, thus increasing their self-perception as actors of civic change and full participants in the civic process (Bobkowski & Miller, 2016; Guldin, 2021). Involvement in a journalism program may help educate youth from poor backgrounds about the civic process and instill a sense of civic efficacy, thus helping to reduce the civic engagement gap between the affluent and the underprivileged. Small schools and schools with higher levels of poverty are less likely than large schools and schools with lower levels of poverty to have student media production opportunities (Bobkowski & Miller, 2016; Guldin, 2021).

### ***Student Leadership Development***

Developing student leadership plays a key role in the educational process, including innovations and improving the quality of education (Kamaeva et al., 2021). Providing opportunities to be authentic leaders in school can improve students' positive

self-regard, feelings of competence, and engagement. It can also improve relationships between students and teachers. Furthermore, organizational decision making involving diverse stakeholders (eg. students, teachers, parents, administration, and community members) improves organizational outcomes. Therefore, involving students in school governance is in the school's best interest (Lyons & Brasof, 2020).

### ***Student Voice***

The inclusion of students' voices in educational decisions aligns with a participative leadership style. This style states that administration gives opportunities for students to lead rather than all leadership and power residing with the principal (Barker, 2018). Students' voice helps students become more socially and emotionally competent individuals. Once relationships between administration and students are formed, it is easier for leaders to create a shared vision. Like shared leadership, effective student voice models hinge on participants developing a shared, collective vision for their work with meaningful roles for all participants: educators and students. Students, therefore, are positioned to play an important role in their school (Barker, 2018).

Student voice has a long educational history and is used for a body of practices that include student consultation, participation, collaboration, leadership, and intergenerational learning (Mayes et al., 2016). Having students involved in their education setting is vital for their growth of the student. Not only does it get students involved in the democratic process, but students who develop voice and leadership skills strengthen feelings of self-efficacy, and in turn, are empowered to make a difference in their schools and communities (Lac, 2018). Embracing student voice also benefits the

educator. The teacher grows when they can understand and embrace the need of the student, especially with systems in place to heighten student's voice (Lac, 2018).

Schools that include students in their decision making generate exciting and optimistic outcomes. Students' voice is also beneficial for students, increasing self-esteem, self-efficacy, and school connectedness for those involved (Anderson, et al., 2022). O'Reilly (2019) found that the school's perception of students' leadership capabilities was directly related to the number of student voice opportunities on campus. The qualitative study drew upon the participants' experiences to understand how a student's voice is promoted at the school site. Students felt more connected to their school community when there are opportunities to use their voices (O'Reilly, 2019).

However, building an effective program for students' voices can be problematic. Efforts to engage students in developing their student voices can deteriorate if school leaders are not genuine and committed (Charteris & Smardon, 2019; Quinn & Owen, 2016). Publication advisers and journalism students can view controversial topics with wariness based on the level of their intrinsic need to self-censor. It is an extrinsic trait dictated by the climate of public opinion and the internal desire of individuals to speak out based on social climate (Nicolini & Filak, 2022). The theory of expression within mass media is Noelle Neumann's spiral of silence theory. It explains the process by which individuals choose whether to express their opinion on a controversial issue. However, that choice can be dictated based on fear, isolation, or reprimand by the administration. Therefore, individuals form a judgment about public opinion and use that information to predict how others (in this case, school administration) would react if they



express their opinions. Those in the majority are more likely to speak their opinions in public, whereas those in the minority will remain silent out of fear of social isolation (Dzula et al., 2020). Majority opinions are highlighted further and gain strength, and minority opinions are increasingly obscure, which results in a spiraling process (Gearhart & Zhang, 2018). Students and advisers will find reasons to avoid controversial topic coverage, even when they acknowledged those topics were vital to the interests of the student media and the school community (Nicolini & Filak, 2022). Tolerance for student speech should not be rooted in administrative opinion or political stance, but rather in the student's development.

School officials ought to look at student speech with unlimited forbearance because there is value in student expression (Dhingra, 2019). Educators must defend freedom of expression and teach students to oppose political groups that advocate for unconstitutional censorship. Simultaneously, holding school administrators and others who implement policies that violate the First Amendment accountable is crucial to protecting academic freedom (Moore, 2018).

### **Student Censorship**

The issue of censorship has long presented unique challenges for high school journalists within the United States. The Court has established its view on student speech in *Tinker* and *Hazelwood*, but also in *Bethel v. Fraser* (1986), *Dean v. Utica* (2004), *Morse v. Fredrick* (2007), *Bell v. Itawamba* (2012), and *Mahanoy Area School District v. B.L.* (2021). For students, free speech rights depend on the individual school's mission (Dhingra, 2019). Current First Amendment protection positions high school journalism in

a space separate from collegiate and professional journalism (Nicolini & Filak, 2020). Administrators may fear that if given complete editorial control, students would write about anything, even possibly “exposing” the administration on issues they may not be comfortable discussing (LoMonte, 2021). Adults may either dismiss or disregard student-led work or spend more time focusing on the youth's "presentation skills" rather than what they were asking traditional leaders to consider changing (Lac, 2018). Especially when it comes to politics or social issues, conflicting viewpoints create challenges for school leaders to address while making all stakeholders happy. Research shows that student journalists and advisors experienced routine hostility that puts information, careers, and publications at risk (Farquhar & Carey, 2018). Administration must navigate the needs of their students and teachers and the needs and wants of their community. Having a student journalism program with the power to publish anything may cause controversy. Inversely, denying students access to accurate information about the problems in their lives, and a chance to air those problems and connect with others who share them, can result in long-term consequences (LoMonte, 2021).

Journalism teachers alter the authenticity of their instruction. Specifically, in this discipline, teachers know that censorship of students can be a possibility (Norins et al., 2021). Students themselves may feel punishment, threats, and possible termination ahead for themselves (Norins et al., 2021). Using prior review policies may increase student self-censorship out of fear of academic consequences for bringing attention to controversial topics (Farquhar & Carey, 2018). The Journalism Education Association (2015), the largest association dedicated to journalism educators in the United States, has

called student self-censorship widespread and destructive to their ability to learn authentic journalism.

### **Administration's Role in Gatekeeping**

Gatekeeping theory was developed by Kurt Lewin in 1947 in an unfinished manuscript (Lewin, 1947). Since he first coined the term *gatekeeping* in 1947, the theory has been used heavily in mass communication research, particularly with news editors and the story selection process (Steele, 2018). An important aspect of Lewin's theory is his idea that forces determine whether an item passes through a gate. With gates controlling access to all sections within all channels, forces are at work throughout the channels (Shoemaker & Vos, 2009). According to Shoemaker & Vos (2009), in terms of media, *gatekeeping* is the "process of culling and crafting countless bits of information into the limited number of messages that reach people every day, and it is the center of the media's role in modern public life" (Shoemaker & Vos, 2009, p. 1). Because of its applicability, the theory commonly used in mass communication can also translate to journalism classrooms. Gates are decision or action points. Gatekeepers determine which units get into the channel and which pass from section to section, exercising their preferences and/or acting as representatives to carry out a set of pre-established policies. They also decide whether to make changes to the item (Shoemaker & Vos, 2009).

Gatekeeping can be challenging at different levels because of many factors, such as political views and personal beliefs, or institutional views or beliefs (Steele, 2018), which made level to various forms of censorship. At the individual level, a student might not report on an assigned topic because of their own beliefs or may self-censor because of the

beliefs of the organization or the community. At the organizational level, the administrator overseeing the journalism program gatekeeps based on the policy of the school or district or the culture of the community. At the social level, gatekeeping occurs when the student's work does not reflect the community's culture (Steele, 2018).

Understanding the role of student media and students' voice in the school, the administration can incorporate it as a natural part of school culture. If school leaders strive to center the voices of students in their schools, then they must embrace this core belief and create a school culture that nurtures it (Lac, 2018). For student voice initiatives to thrive within school settings, there needs to be a concerted effort made on the part of school administrators to value and support this work (Lac, 2018). Educators have an important role to play in cultivating and maintaining online and offline civic engagement among younger people. Young people's perception of civic engagement is the result of their poor understanding of American democracy (Kenna & Share, 2007; Nelson & Lewis, 2017).

Analyzing various administrators' gatekeeping policies to explore how the student's legal status of censorship relates to their comfort level in publishing possibly controversial material (Cogar, 2021). Educators must be knowledgeable of student speech and expression rights in school under the First Amendment. They must be comfortable with maintaining a sound educational environment while respecting students' First Amendment speech and expression rights in school, and confident in their decisions that affect this balance (Moreno, 2019; Ramey, 2009).

## District Policies

School districts in a metro area in a southern region of a southwestern state adopt board policies housed in two areas: legal and local. Legal policies compile federal law, state law, and court decisions, providing the statutory context in which all other policies should be read. Local policies reflect decisions made by a board of trustees.

A school district in a metro area in a southern region of a southwestern state has a local policy that states “all publications edited, published, and distributed in print or electronically in the name of the District or an individual campus shall be under the control of the campus and District administration and the Board. All school-sponsored publications approved by a principal and published by students at an individual campus shall be part of the instructional program, under the supervision of a faculty-sponsored.” Exact wording occurs in three similar districts in the metro area of the southern state. One district adds that “the publications shall be carefully edited to reflect the ideals and expectations of the citizens of the District for their schools. The principal shall be responsible for all matters pertaining to the organization, issuance, and sale of such publications and any other publication procedure, subject to the Superintendent’s approval.”

The legal policy states “the District’s educators shall exercise editorial control over style and content of student speech in school-sponsored expressive activities so long as their actions are reasonably related to legitimate pedagogical concerns.” The exact wording occurs in three similar districts in the metro area of the southern state. Each district listed used *Hazelwood Sch. Dist. v. Kuhlmeier* for its justification and use the

Texas Association of School Boards to supply the wording for board policy.

### **Summary and Conclusions**

The literature supports the value of a journalism education, which encourages students to see the importance of media literacy, civic engagement, student leadership development, and student voice, as well as the fundamental meaning of the First Amendment (Bobkowski & Cavanah, 2019; Bobkowski & Belmas, 2017; Neely, 2015). The literature also supports the idea that prior review-related policies may increase student self-censorship and influence journalism teachers' pedagogy out of fear of consequences (Farquhar & Carey, 2018). The relationship between media and society is evolving due to rapid sociological and technological changes, media influence and the political landscape. Journalism teachers possess a unique ability to improve society by providing journalism pedagogy (Listopad & Crawford, 2018).

Few studies exist to compare the content of journalism programs from schools with open forum policies versus schools that experience some form of prior review or prior restraint, knowing the different levels of gatekeeping that can occur (Steele, 2018). Examples of how those gatekeeping practices have caused harm or repressed content deemed negative to the school image have surfaced (Cogar, 2021). Because the standard differs from administration to administration, I will attempt to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media. In Chapter 3, I will identify the research design and rationale, the role of the researcher, the methodology, trustworthiness, and ethical procedures.

### Chapter 3: Research Method

The purpose of this basic qualitative research was to examine how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. Within this qualitative study, I attempted to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media. In this chapter, the methodology chosen for this study is addressed. Additionally, the role of the researcher, the details of methodology, the description of participant selection, the research questions, the researcher-developed instrument, recruitment procedures, data collection, and data analysis are explained. The chapter concludes by addressing trustworthiness and ethical procedures.

#### **Research Design and Rationale**

The purpose of this basic qualitative research was to examine how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. The research question was the following:

RQ1: How do administrators determine “legitimate pedagogical interest” in their decision to use prior review or prior restraint?

The concept in question is administrator decision-making surrounding prior review and prior restraint of high school student-created media. A basic qualitative study, with virtual semistructured interviews, is the research tradition that was chosen for this study. A qualitative approach permits a researcher to understand individuals or groups in

their natural settings in ways that are contextualized and reflect the meaning that people make out of their own experiences (Ravitch & Carl, 2016). The perspective of high school administrators is key in determining what standard they apply to prior review or prior restraint and in what situations they use prior review or prior restraint as part of the oversight of student-created media. A basic qualitative study allows for descriptive and analytic observation, which means that researchers are interested in understanding, describing, and ultimately analyzing, in detailed and deeply contextualized ways, the complex process, meanings, and understandings that people have and make within their experience, context, and milieu (Ravitch & Carl, 2016). Second, a qualitative approach involves seeking complexity and contextualization of how reality exists and unfolds in ways that are temporal, contextual, and highly individualized even as participants may share certain experiences and perspectives (Ravitch & Carl, 2016). Third, qualitative research allows the researcher to be the primary instrument, meaning that the subjectivity, social location/identity, positionality, and meaning-making of the researcher shape the research in terms of its processes and methods and therefore shape the data and findings (Ravitch & Carl, 2016). Lastly, qualitative researchers pay close attention to processes and relationships, meaning that there is an intentional focus on how the research process itself generates meaning and important frames for understanding data (Ravitch & Carl, 2016).

A case study research method involves studying a specific case of real-life events, which is typically bounded by time and place (Ravitch & Carl, 2016). This would not have been an ideal method because the administrative use of prior review and prior



restraint can happen at any time during any school year. An ethnography method emphasizes in-person field study (Ravitch & Carl, 2016), which would not have been feasible because prior review and prior restraint are not used daily. Grounded theory is an approach that involves attempting to develop a theory that comes from the data or the field, which did not apply to this study, in which the goal was not to develop a theory. Lastly, a phenomenology research method explores a phenomenon with an individual or group of individuals, in which the researcher is interested in an individual's lived experiences (Ravitch & Carl, 2016). Participants were not immersed in using prior review or prior restraint, but it was a policy implemented based on the administrator's choice. Therefore, to fully understand administrative decisions on the use of prior review and prior restraint, semistructured interviews as part of a basic qualitative design fulfilled the purpose of this study.

### **Role of the Researcher**

The role of the researcher in a basic qualitative study is to explore the experiences of the participants from their points of view through interviews to determine universal truths (Creswell, 2014). As the researcher and observer, I served as the primary instrument for data collection. There are distinct complexities when collecting data with participants. The intent of the study, the research question, the relationship between the researcher and the participants, and the interpretation of the data are always embedded in a wider context (Karagiozis, 2018). Consequently, I could not allow the bias of my position, perceptions, and experience to cloud my interpretation of the data gathered during interviews. A researcher needs to maintain constant and systematic awareness of

both components to confront bias, underlying beliefs, and assumptions that stem from the researcher's own experiences (Ravitch & Carl, 2016).

I spent 9 years as an adviser of student media in the southern region of the southwestern state. I am a member of state and national academic scholastic journalism associations. Although my knowledge of the applicability of prior review and prior restraint is vast, I had no supervisory relationship or power over the study's participants. To further address the integrity of the study and any bias, participants were chosen solely from neighboring school districts, rather than the school district where I am employed.

Reflexivity defines the researcher's self-evaluation of their role throughout the research study. Also, reflexivity describes the biases, experiences, and values introduced into the study (Creswell & Creswell, 2018). Although my experience as an adviser and participation in the academic community helped provide an understanding of the data gathered in the study, they also offered the potential for bias. Member checks with participants were conducted throughout the research to ensure unbiased interpretation of data, themes, and conclusions. Understanding their subjectivity and interpretation allows researchers to engage in reflexivity that determines how a study is constructed, designed, and portrayed (Ravitch & Carl, 2016). Participants reviewed transcripts before being approved to be used. Transcript review and member checking established the validity of the study. Creswell and Creswell (2018) stated that member checking is one way to ensure the accuracy of the findings in a study.

## Methodology

### Participant Selection

The target population for this study were high school administrators at schools with student-created media in a southern region of a southwestern state. This was accumulated based on publicly available information on school district websites where it had been identified that student-created media was being published. I targeted this population because they are more likely to have applicable practices appropriate for this study. I chose purposeful sampling because it is “the primary sampling approach used in qualitative research” and “provides context-rich and detailed accounts of specific populations and locations” (Ravitch & Carl, 2016, p. 128). This was justified because it is the primary sampling approach in qualitative research, which allowed me to be deliberate in selecting individuals and or research settings that would help me get the information needed to answer the research question (Ravitch & Carl, 2016).

School administrators were chosen based on (a) if their school had student-created media, which might include a yearbook, newspaper, broadcast, or any student-created media, and (b) if the administrator had at least 2 years of principalship experience. These criteria assisted in achieving the ideal sample, which was eight to 10 high school administrators. As Ravitch and Carl (2016) explained,

There are no set rules in qualitative research when it comes to having a certain number of participants. The goal of purposeful sampling and qualitative research is to rigorously, ethically, and thoroughly answer your research question to achieve a complex and multi-perspectival understanding. (p. 138)

The sample number in this study was valid because it gave a local, macro-sociopolitical, and more importantly, contextual answer to the research question.

After Walden Institutional Review Board (IRB) approval, I developed a database of high schools in a southern region of a southwestern state that contained student-created media based on publicly available information. I contacted the corresponding school administrators directly via my official Walden email to see if they met the study's criteria and gauge their willingness to participate to meet the ideal purposeful sample of eight to 10 high school administrators. Each participant was given a pseudonym to protect their identity, their privacy, and the validity of the study.

### **Instrumentation**

After IRB approval to conduct the study and upon determining the purposeful sampling, I contacted the participants who had expressed interest via my official Walden email. Data collection consisted of semistructured interviews with each participant. The research question was the following:

RQ1: How do administrators determine “legitimate pedagogical interest” in their decision to use prior review or prior restraint?

I developed the interview protocol (Appendix) based on ensuring that the data gathered would fully answer the research question. These questions were developed based on my knowledge of scholastic journalism and the conceptual framework. The questions were reviewed by the committee chair and cochair to ensure validity. A chief communications officer, chief of student advocacy, and assistant superintendent of teaching and learning of a local school district, all of whom held doctorate degrees, also

reviewed the questions to ensure validity. The president and past president of a journalism education association also reviewed the questions to ensure validity and provide contextual feedback. The consensus was to broaden specific questions to ensure that the research question would be answered. The interviews took place virtually using a video conferencing platform during a time established by the participant. The allocated time for the interviews were no longer than 1 hour.

### **Procedures for Recruitment, Participation, and Data Collection**

After Walden Institutional Review Board (IRB) approval, I developed a database of high schools in a southern region of a southwestern state that contained student-created media based on publicly available information. I contacted the school administrators directly via my official Walden email to see if they met the study criteria and gauge their willingness to participate to meet the ideal purposeful sample of eight to 10 high school administrators. The email contained information regarding the nature, purpose, and criteria for the study, as well as the official consent form participants needed to participate. Once interested principals replied, agreeing to the study with “I consent,” I began scheduling interviews using my official Walden email and the electronic calendar. One interview was conducted per week at a minimum. If more than one per week could be conducted, it was noted. The interviews took place virtually using a video conferencing platform during a time established with the participant. This allowed the participants and I flexibility to conduct the interview from any physical location. Allocated time for interviews were no longer than 1 hour. I saved the audio recording from the virtual platform after the interview in an encrypted folder. Then, I used the

virtual platform to transcribe the interview to a word processing program. Once completed, I debriefed with the participants via email, thanking them, providing the transcript to the participants to ensure validity, and giving a 25-dollar gift card for their participation. This allowed the participants to review, comment, or correct any misunderstandings before I officially used the data.

### **Data Analysis Plan**

After participants approved the transcript, the coding process began. Qualitative data analysis is the intentional, systematic scrutiny of data at various stages and moments throughout the research process (Ravitch & Carl, 2016). Part of analysis involves recognizing that it begins as soon as the first piece of data is collected and continues throughout the entire research process. *Precoding* is the process of reading, questioning, and engaging with data before the formal coding process begins, which is the first step (Ravitch & Carl, 2016). This allows researchers to familiarize themselves with the data so that the data can become less opaque. *Coding* entails ways of organizing and labeling data that help with analysis by identifying patterns across multiple data points, identifying relationships within data, and establishing a common theme across nonuniform data that ultimately helps answer the research question (Ravitch & Carl, 2016). This helps the researcher organize data into manageable units or chunks to engage with analytically.

Coding and connecting strategies are complementary and are often used in conjunction, evolving to find themes within the data. A theme can be an outcome of coding, categorizing, or analytic reflection (Saldaña, 2016). There are first and second

cycles of coding to distill categories and themes from the data using significant statements and phrases from each transcript. These codes could be used to create an initial list of codes with the potential to become categories and then themes. Ideally, themes correlate with the research questions. The link to the research questions led to the development of interpretations and conclusions to the research question (Saldaña, 2016).

### **Trustworthiness**

In qualitative research, trustworthiness and validity refer to how researchers can affirm that their findings are faithful to participants' experiences. Researchers should adhere to different standards or criteria, including credibility, transferability, dependability, and confirmability (Ravitch & Carl, 2016). In essence, the researcher needs to establish credibility and rigor.

### **Credibility**

Credibility is directly related to the research design and the researcher's instruments and data. This is achieved by structuring a study to seek and attend to complexity throughout a recursive research design process (Ravitch & Carl, 2016). One approach is triangulation. The goal is to seek out and engage with multiple perspectives to answer the research question (Ravitch & Carl, 2016). This was done by ensuring that the target sample size of eight to 10 participants was reached and that participants were from diverse schools. More so, the research committee reviewed the research design to ensure that it met the robust standard set forth by the university. Lastly, once participant data were received, they were transcribed to a word processing program and reviewed by the participant before being used in the research. This is called member checks or

participant validation. This is an important process that is used to strengthen the rigor and validity of qualitative research (Ravitch & Carl, 2016).

### **Transferability**

Transferability is how qualitative studies can be applicable, or transferable, to a broader context while still maintaining their context-specific richness (Ravitch & Carl, 2016). Achieving transferability includes having detailed descriptions of the data themselves as well as context. This allows for the audiences of the researcher to transfer aspects of the study design and findings by taking into consideration different contextual factors instead of attempting to replicate the design and findings (Ravitch & Carl, 2016). In this research study, the practices of the high school administrations can apply to similar campuses across the southern state trying to improve understanding of scholastic journalism programs. The practices can also be applied outside the southern state with administrators in similar settings, which increases the study's external validity.

### **Dependability**

Dependability refers to the stability of the data (Ravitch & Carl, 2016). It entails that the researcher has a reasoned argument for the collection of the data and that the data are consistent with the argument. Ultimately, it ensures that the data answer the research question. Investigator triangulation entails that there are multiple researchers involved in each study. Therefore, the methodology and interview questions were reviewed by committee members to gather feedback and input. A chief communications officer, chief of student advocacy, and assistant superintendent of teaching and learning of a local school district, all of whom held doctorate degrees, also reviewed the questions to ensure



validity. The president and past president of a journalism education association reviewed the questions to ensure validity and provide contextual feedback. The consensus was to broaden specific questions to ensure that the research question would be answered. All interviews were recorded and transcribed, and the transcription was approved by the participants before being used.

### **Confirmability**

The goal of confirmability is to acknowledge and explore how the researchers' biases and prejudices map onto interpretations of data. Methods to achieve confirmability include implementing triangulation strategies, researcher reflexivity process, and external audits (Ravitch & Carl, 2016). Reflexivity is how the research process affects the researcher and must be scrutinized, problematized, and complicated. As mentioned, I spent nine years as an adviser of student media in the southern region of the southwestern state. I am a member of state and national academic scholastic journalism associations. Therefore, my knowledge of the applicability of prior review and prior restraint is vast. It will be important for me to interpret the data in an unbiased way. As the researcher, if I do not actively and critically monitor and challenge my bias and positionality, the complexity and rigor of the study, no matter how theoretically robust the design, will be undermined (Ravitch & Carl, 2016).

### **Ethical Procedures**

Ethical guidelines reference the importance of maintaining the confidentiality of the participants' identities and ensuring the study's integrity set forth by the university. Therefore, this study will go through a robust committee review and Walden University

IRB approval process before the study begins, including completing Form A which ensures the study adheres to the standard of Research Ethics, Compliance, and Partnerships. More so, I completed the Collaborative Institutional Training Initiative course, which ensures I adhere to the ethical standards set for doctoral research.

With the study, while cultivating the target population and recruiting the ideal sample, all names of the administrators and school sites will be kept confidential to adhere to the university's ethical standard, protect their privacy, and the validity of the study. This will be done by giving the participants a pseudonym. To adhere to ethical data collecting, interview transcripts will be reviewed to confirm that they reflect the participants' conversations. The transcripts will also be approved by the participants. I will save the audio recordings and transcripts in an encrypted folder after the interview. Unless requested by a committee member or official Walden University administration, no other persons will have access to the data. All materials from the study will be kept in the encrypted folder for five years. After those five years, all the data will be destroyed.

### **Summary**

In Chapter 3, I provided information regarding the process of gathering and analyzing data for this study. The purpose of this basic qualitative research is to examine how campus administrators determine "legitimate pedagogical interest" when using prior review or prior restraint on high school student-created media. The target population for this study will be high school administrators at schools with student-created media in a southern region of the southwestern state. The ideal purposeful sample will be 8-10 high school administrators. Data collection will consist of semi-structured interviews with

each participant. The interviews will be transcribed manually to a word processing program to begin coding, categorizing, and theming the data. In Chapter 4, I will present the setting of my research's setting, data collection, data analysis, results, and evidence of trustworthiness.

## Chapter 4: Results

The purpose of this basic qualitative research was to examine how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. Exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media provided an increased understanding of the oversight of student-created media. The following research question guided the research:

RQ1: How do administrators determine “legitimate pedagogical interest” in their decision to use prior review or prior restraint?

This chapter is organized into the following sections: setting, data collection, data analysis, results, evidence of trustworthiness, and a summary of the data.

### **Setting**

This basic qualitative study was conducted virtually using a video conferencing platform during a time established by the participant. This allowed the participants and I flexibility to conduct the interview from any physical location. The target population for this study was high school administrators at schools with student-created media in a southern region of a southwestern state. I targeted this population because they are more likely to have applicable practices appropriate for this study. School administrators were chosen based on (a) if their school had student-created media, which may have included a yearbook, newspaper, broadcast, or any student-created media, and (b) if the administrator had at least 2 years of principalship experience. These criteria assisted in

achieving the ideal sample of eight to 10 high school administrators. This allowed a local, macro-sociopolitical, and more importantly, contextual answer to the research question.

### Demographics

A total of 8 participants who had at least 2 years of principalship and any student-created media at their school were included in this study. Table 1 shows background information on each participant.

**Table 1**

*Participant Years of Experience, Type of High School, and Approximate Number of Students*

Participant	Years of administrative experience	Type of high school	Approx. number of students
Participant 1	11 years	Comprehensive 4-year high school	630
Participant 2	2 years	Comprehensive 4-year high school	1,400
Participant 3	N/A	Comprehensive 4-year high school	2,600
Participant 4	3 years	Comprehensive 4-year high school	2,100
Participant 5	20 years	Comprehensive 4-year high school	2,500
Participant 6	16 years	Comprehensive 4-year high school	2,800
Participant 7	17 years	Communications-specific magnet school	560
Participant 8	23 years	Comprehensive 4-year high school	1,900
Participant 9	18 years	Comprehensive 4-year high school	2,500

*Note.* Participant 3 was a high school administrator of a comprehensive high school with approximately 2,600 students. Although Participant 3 replied and scheduled an interview, Participant 3 did not show up for the interview and did not respond to subsequent follow-up emails.

### **Data Collection**

The purpose of this basic qualitative research was to examine how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. Before I collected any data, I received approval from Walden University’s IRB (Approval # 02-21-23-0786253). I developed a database of high schools in a southern region of a southwestern state that contained student-created media based on publicly available information. Then, I developed a database of 268 high school administration emails from high schools in a southern region of a southwestern state. I developed a data log that included when the population database was created, when participants were emailed, when interviews were scheduled and conducted, and how long the interviews lasted. I contacted the administrators directly via my official Walden email to see if they met the study’s criteria and gauge their willingness to participate to meet the ideal purposeful sample. The email contained information regarding the nature, purpose, criteria, and the official consent form participants needed to participate. Once interested participants replied, agreeing to the study with “I consent,” I began scheduling interviews using my official Walden email and the electronic calendar. After a fourth follow-up email was sent to the initial target population with minimal to no responses, the population was expanded by 362 more high school administrators within the southern region of the southwestern state.

Interviewers were scheduled and conducted over the course of 6 weeks. Because the interviews occurred toward the end of the school year, which may have also contributed to a minimal initial response, there was difficulty in scheduling opportune

times to conduct the interviews. The interviews took place virtually using a video conferencing platform for all participants. This allowed the participants and me flexibility to conduct the interview. Although Participant 3 replied and scheduled an interview, Participant 3 did not arrive for the interview and did not respond to subsequent follow-up emails. The Appendix shows the interview protocol that was used. Once the interview concluded, I saved the audio recording from the virtual platform after the interview. I used a word processing program to transcribe all eight interviews. Once completed, I emailed each participant a copy of the transcript to ensure that the transcript accurately reflected their responses, thanked them, and provided them a digital 25-dollar gift card for their participation. Ten weeks after the last interview, all participants were sent a request for an interview to ask a follow-up question. Three of the participants conducted the interview via a video conferencing platform. The remaining participants answered the question via email. After I received all the data, I conducted another round of coding to determine if another category or theme emerged.

### **Data Analysis**

Qualitative data analysis is the intentional, systematic scrutiny of data at various stages and moments throughout the research process (Ravitch & Carl, 2016). Coding entails ways of organizing and labeling data that help with analysis by identifying patterns across multiple data points, identifying relationships within data, and establishing a common theme across nonuniform data that ultimately helps answer the research question (Ravitch & Carl, 2016). *Precoding* is the process of reading, questioning, and engaging with data before the formal coding process begins, which is

the first step (Ravitch & Carl, 2016). This allows the researcher to familiarize themselves with the data so that the data can become less opaque. Coding and connecting strategies are complementary and are often used in conjunction, evolving to finding themes within the data. This helps the researcher organize data into manageable units or chunks to engage with analytically. All data were subjected to two cycles of coding.

Eight participants were interviewed. Each participant was asked 10 questions, with two questions having set follow-up questions. Once the interviews concluded, I transcribed each interview and sent it to the participant for approval. After the interviews were transcribed and approved, I began the coding process. Each transcription was hand-coded by highlighting, labeling, and developing codes for the first round of coding. Each transcript yielded an average of 20 codes. I categorized the common codes found into five categories, as shown in Table 2.



**Table 2***Categories and Common Codes*

Category	Common codes
Determining legitimate pedagogical interest	Factual and unbiased Align with [state standards] Of interest to students
Review, change, or removal of student-created media	Process already in place Does not review content Review the yearbook before publication
Positive impact of student-created media	Free speech with restrictions Support student journalists Open communication Student-produced Student's responsibility
Challenges of student-created media	No training on scholastic journalism Avoid trouble Speech is not totally free Free speech with restrictions
Influences on student-created media	Community influence Political influence Align with student code of conduct Current events influence School board influence Legal expectations Parent influence

*Synthesis* combines different things to form a new whole, and it is the primary heuristic for qualitative data analysis—specifically, the transitions from coding to categorizing (Saldaña, 2016). After categorizing the data, I placed the codes next to each other in a landscape table for a more focused, second round of coding to determine connections, commonalities, and differences. There were first and second cycles of coding to develop categories and themes from the data using significant statements and phrases from each transcript—the second round allowed for organization consistency in codes across transcripts. Similar codes emerged during the data analysis process. Axial coding is a technique in qualitative research that involves taking larger segments of data and seeing how they relate in smaller categorical themes (Holmes, 2022). A theme can be an outcome of coding, categorizing, or analytic reflection (Saldaña, 2016). Ideally, themes correlated with the research question.

## **Results**

The purpose of this basic qualitative research was to examine how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. Because “legitimate pedagogical concerns” differ from school to school, I attempted to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media. The following research question guided the research:

RQ1: How do administrators determine “legitimate pedagogical interest” in their decision to use prior review or prior restraint?

The results and findings of this study were based on my analysis of the data collected from eight high school administrators' interviews. The following four overarching themes emerged:

- Theme 1: Determining legitimate pedagogical interest
- Theme 2: Using prior review to avoid conflict
- Theme 3: External forces to gatekeeping
- Theme 4: Support for student's voice

### **Theme 1: Determining Legitimate Pedagogical Interest**

RQ1: How do administrators determine “legitimate pedagogical interest” in their decision to use prior review or prior restraint?

In *Tinker v. Des Moines* (1969), Justice Abe Fortas's majority opinion said, “it can hardly be argued that ... students ... shed their constitutional rights... at the schoolhouse gate.” However, in *Hazelwood v. Kuhlmeier* (1988), the Court said, School must be able to set high standards for the student speech that is disseminated under its auspices—standards that may be higher than those demanded by some newspaper publishers or theatrical producers in the “real” world—and may refuse to disseminate student speech that does not meet those standards.

The *Tinker* decision concluded that students do not shed their free speech rights in school. However, the *Hazelwood* decision allowed school administrators to restrict speech by establishing prior review or prior restraint—meaning that principals have the right to review, change, or remove student-created media if the school sponsors it and if

the school administrator has a “legitimate pedagogical interest” in preventing the publication of articles (*Hazelwood v. Kuhlmeier*, 1988). Because "legitimate pedagogical interest" is not defined and differs from administration to administration, high school administrators themselves determine what "legitimate pedagogical interest" is in the use of prior review or prior restraint. Participants said that determining "legitimate pedagogical interest" is ensuring that student-created media is factual, is unbiased, and aligns with district and state curriculum standards.

Participant 1 stated,

Two factors are primarily involved. First, what are the [state standards] for the assignment—do those match up to what the student created? Second, what was the assignment—does what the student-created match what the assignment was? If those match, we have legitimate pedagogical interest. If we did something outside the TEKS or the assignment, there would be questions that need to be answered.

Participant 2 stated,

We're going to look at the climate of the campus because we want to be truthful and the [student-created media] has got to be factual. It can't be biased. And we always want to tell the truth to the students.

Participant 4 stated,

When evaluating student created work, media or otherwise, I depend on the standards that are aligned to the assignment or task. In most of the cases, student created media serves to either inform, persuade, explain, or entertain. When the

assignment or task includes student opinion, I also use the student code of conduct to verify the opinion or material presented does not violate the privacy or rights of other students and staff.

Participant 6 stated,

I just make sure that whatever they're reporting on, we are not making it too much personal. At the end of the day, even though you're trying to create that interest in whatever the production is, we're not about politics.

Participant 8 stated,

When I review things, I am looking for things that will or could be an issue for our community, such as material that is grammatically correct, poorly written, inadequately researched, biased or prejudiced, vulgar or profane or unsuitable for immature audiences; potentially sensitive topics, such as teenage sexual activity in a high school setting; speech that might reasonably be perceived to advocate drug or alcohol use, irresponsible sex, or conduct otherwise inconsistent with the shared values of a civilized social order; or material that would associate the school with anything other than neutrality on matters of political controversy.

Participant 9 stated,

I don't feel that a student created media is a representation of a teacher's pedagogical representation in all circumstances. I believe students' creativity should be allowed as long as it is within district policy and guidelines. Even taking into consideration the [state standards], is the product in line with what the student is to learn? Those are the things I'm thinking about.

Analyzing various administrators' gatekeeping policies to explore how the student's legal status of censorship relates to their comfort level in publishing possibly controversial material (Cogar, 2021). Having a student journalism program with the power to publish anything may cause controversy, which may justify having a review process in place before publication.

### **Theme 2: Using Prior Review to Avoid Conflict**

*Prior review* occurs when anyone not on the student-media staff requires that he or she be allowed to read, view, or approve student material before distribution, airing, or publication (Ewell et al., 2019). *Prior restraint* occurs when someone not on the student-media staff requires pre-distribution changes to or removal of student media content (Ewell et al., 2019). *Gatekeeping* is the “process of culling and crafting countless bits of information into the limited number of messages that reach people every day, and it is the center of the media’s role in modern public life” (Shoemaker & Vos, 2009, pg. 1). The gatekeeper decides what information is disseminated. Through prior review, the gatekeeper may remove unwanted, sensible, and controversial information. Therefore, the gatekeeper influences the school community socially, culturally, ethically, and politically based on their personal beliefs.

Based on the data, all eight Participants had some sort of prior review process in place before student-created media are published.

Participant 2 stated,

I know we do have an editor for our yearbook here on campus. Then, there's the teacher and then all the principals. We'll get a preview and we're assigned different parts. We're just looking to ensure everything's in good taste and values.

Participant 9 mentioned their "department coordinator, academic dean, associate principal, and the principal," are all involved in the prior review process before student-created media is published.

Specifically, Participants 1 and 6 have a review in place in order to avoid conflict. Participant 1 stated, "[I] have a 360 view – make sure we're not going to get ourselves in any kind of trouble. You have to keep your community involved. You have to keep those things in the back of your mind." Participant 6 stated,

I have my eyes on [student-created media] because if something is going to go out in print that's out there forever and going out to our community, I want to make sure that we're - sensitive to everything - we're not pushing an agenda that we shouldn't be pushing. That is typically the angle I look for when I get [the newspaper].

To not upset those consuming the student-created media, Participant 8 stated that the program does not get any political events, stating,

We really don't get into that. We just want to showcase what our kids are doing. We are just trying to use [student-created media] as a way to highlight the positive things our kids are doing. We hear so much today, 'Oh, kids are terrible, don't know how to behave. Kids are mean and cruel.' We really want to showcase the

positive stuff of what our students are able to do and not - negative. There's enough of that.

Participant 7 stated that the “expectations are already up there for our kids and our staff” because they are a communications-magnet school. The Participant stated that same expectation “on myself as well” and why they “haven’t really delegated” the review process “to anyone else” on their administration team. Therefore, topics for student-created media are pre-approved by the Participant. They continued,

I usually like the kids to stick to topics that have been pre-approved so removal isn’t necessary because everything is streamlined to kind of get permission first.

There’s no forgiveness later with the kids. I don’t want them to work on this huge product and it be for nothing because I can’t publish it because it’s so – you know, controversial or not school appropriate.

Subsequently, in their follow up interview, Participant 7 stated,

I know what will upset my parents and my community and what they'll be OK with. For instance, I have a lot of LGBTQ students. I know if somebody wants to take on that topic, it's not going to be a big deal because our kids are full of tolerance and thereby, you know, their parents are too. But I know that's not the same at every school, you know. And so, me authorizing that elsewhere, I'm not sure if I would. I would probably bring them in and see where they were going with that thought and then proceed from there. But I like that shared leadership model where we we've kind of come to the conclusion together. We take the topic and kind of tweak it or just drop it completely and go with choice number.



Participants 4 and 8 stated that they use the student code of conduct as their gatekeeping barometer when determining whether to initiate prior review or prior restraint. Participant 4 stated,

We closely align it to the student code of conduct. So, if there's something in the media that's mentioned that I know goes against the student code of conduct... we cut it. Parents are going to say we authorize [it]. So, we have to cut it. There's no freedom of speech in high school. You have a student code of conduct that you have to abide by and I think that's where we just have to set the limit.

Participant 8 stated,

Typically, for the most part, things go through me. And then I just basically look at it, make sure the content is okay - students are, you know, behaving. And we don't have anything that's out of the ordinary, as far as our student code of conduct goes. The only thing [we change or remove] is [something] in violation of any student code of conduct.

As mentioned, *gatekeeping* can be challenging at different levels because of many factors, such as political views and personal beliefs, or institutional views or beliefs (Steele, 2018). Especially when it comes to politics or social issues, conflicting viewpoints create challenges for school leaders to address while making all stakeholders happy. The data shows gatekeeping happening at the organizational level - the administrator overseeing the journalism program uses gatekeeping based on the school's or district's policy or community's culture, and at the social level - gatekeeping occurs

when the student's work does not reflect the community's culture (Steele, 2018), to avoid conflict.

### **Theme 3: External Forces to Gatekeeping**

RQ1: How do administrators determine "legitimate pedagogical interest" in their decision to use prior review or prior restraint?

Gatekeeping theory explains that forces may either constrain or facilitate the passage of information through the gatekeeping process (Cassidy, 2006; Lewin, 1947). The gatekeeper decides what information is disseminated. Through this process, the gatekeeper removes unwanted, sensitive, and controversial information. Therefore, the gatekeeper influences the school community socially, culturally, ethically, and politically based on their personal beliefs. Based on the data, there are three forces that influence administrators the most when deciding to use prior review or prior restraint on student-created media: the community, the current state of politics and current events, and district expectations, which include board influence and district policy.

#### ***Community Influence***

When asked what their standard is that initiates prior review or prior restraint, Participant 1 stated,

What's not going to give us in trouble, you know? And that can be different from each community, depending on where it gets out. The Boards are a reflection of the community, so whatever the school does is going to have to reflect that in some ways. You'll get hot water quicker with the community than you will

something legal. But of course, if it's legal, then you're in the hot water with the community and you have lawyers in your building.

Participant 2 mentioned how the school community values play a factor in the review process.

There's a process, as far as journalism goes. The teacher had the editing right based on what the community values. When there was ever something bigger than the teacher can handle, it always went to the principal, and then, once it got to the principal, it was like any other student or any other student activity.

Farquhar & Carey (2018) suggested different communities produce different ideologies, influencing the use of prior review. Consequently, Participant 5 mentioned that the size and geographic location of their school influence action on student-created media:

At a comprehensive high school, we're in such a large district in a large city, you have fewer issues than if you're in a small town, small district, single high school type, district situation. So, we're fortunate in that. We don't have to deal with some of those more - controversial type issues - the standard, political-type things, the hot topics like abortion and things that really stir people up and are very divisive.

Participant 7 mentioned that having a global view is important when looking viewing student-created media:

The kids will give me pushback if they are really passionate about the subject matter and sometimes. They don't understand that principals have to think

globally and appease every party in their community and the kids sometimes are, you know, centered on themselves, which is fine. They don't realize the big picture. And they, you know, and even though sometimes when we dialogue, they still don't get it or they still don't agree with it, which is fine, but you know it is what it is.

### ***Politics and Current Events***

The second force that influences administrators when deciding to use prior review or prior restraint are the current state of politics and current events. Participant 1 stated, I'm not exactly thrilled with this, but there are politics involved. You have to keep your community involved - you got to keep those things in the back of your mind. You know, there's a way you can push the envelope without making it too obvious.

Participant 6 stated,

If you're a school publication that's producing [something controversial], you're almost – encouraging or you know, promoting that whatever your agenda might be. Things that are one-sided for politics or religion, or those kinds of things, it could be considered inflammatory to another group based on someone's opinion.

Participant 8 stated, “We really don’t get any political events. We really don’t get into that. We just want to showcase what our kids are doing.”

Subsequently, in the follow-up interview, Participant 6 added,

I always make sure if it's something that could be viewed as being political in any way, shape or form. Even though you're trying to create that interest in whatever the production is, we're not about politics – we are not here for that piece of it.

Participants 5 and 9 were both hesitant about the impact of politics appearing in student-created media, emphasizing the unity of their campus is a priority. Participant 5 stated,

What we don't want to do, you know, is divide our campus and our community. The goal should be really to unite not to divide them. So, that's why I have conversations with the students and there are times that they have something that they feel is very important. And they really want to get that out there. So, it's a matter of conversation of ... 'okay, I value that.' However, how can we do without dividing people and without creating some animosity between groups because they're in disagreement of the topic. Give me a reason why it needs to be put out there, how it will better serve the community, the audience, whatever the case is. Then, it gives me the opportunity to be able to support an advocate.

Participant 9 stated,

There are a lot of sides to things - you know, what's politically correct and what's not. I think our kids have a non-biased and accepting of all. We really try not to show, you know, I guess ... politics. We're not on one side versus the other. It's mutual. From what I've seen, and even when I was a vice principal, just ... not picking a side one way or the other. Just telling the story, both ways, is best.

### *District Expectations*

The third force that influences administrators when deciding to use prior review or prior restraint is district expectations, which include board influence and district policy. Participant 2 stated, “We are provided with policy and procedures from the district and then it’s our job to make sure they’re enforced.” Participant 4 stated,

We closely align - to the student code of conduct. If there's something in the media that is mentioned that I know goes against the student code of conduct, we cut it. We have a student code of conduct that [we] have to abide by and I think that's where we just have to set the limit. You can say what you need to say and use words that you need to that do not go against the student code of conduct. You have to align your morals and everything that you're doing, everything you're saying, to the student code of conduct, and that kind of should be your guide.

Additionally, Participant 8 stated,

The student code of conduct is part of our district policy on certain kinds of things. It’s pretty much cut-and-dry issue. I make sure the content is ok – that students are – you know, behaving. The student code of conduct is part of our district policy.

Based on this theme, the data and the research question, administrators stated that the community, the current state of politics and current events, and district policy are forces that influence their determination of “legitimate pedagogical interest” in their decision to use prior review or prior restraint on high school student-created media.

#### **Theme 4: Support of Student Voice**

Democracies thrive when open and honest discussions of all ideas, laws, and policies are allowed and dissent and criticism are welcome (Moore, 2018). Current First Amendment protection positions high school journalism separate from collegiate and professional journalism (Nicolini & Filak, 2020). Although the *Tinker* decision concluded that students do not shed their free speech rights in school, the *Hazelwood* decision allowed school administrators to restrict speech by establishing prior review or prior restraint.

Free speech rights for students depend on the school's mission (Dhingra, 2019). The inclusion of students' voices in educational decisions aligns with a participative leadership style. This style states that administration gives opportunities for students to lead rather than all leadership and power residing with the principal (Barker, 2018). Students' voice helps students become more socially and emotionally competent individuals. Once relationships between administration and students are formed, it is easier for leaders to create a shared vision. Like shared leadership, effective student voice models hinge on participants developing a shared, collective vision for their work with meaningful roles for all participants: educators and students. Students, therefore, are positioned to play an important role in their school (Barker, 2018)

Two participants were supportive of their students' free speech rights, but with restrictions. Participant 1 stated,

There's a fine line between free speech and what reflects in the community. You have to have a voice – you have to. The kids get to say certain things, but they

have to keep in mind free speech is not totally free. There's going to be consequences for what they want to do. If you want to put some things out there, you have to be prepared for what's going to happen next. Free speech is one that you really have to walk the tightrope on.

Participant 7 stated,

I support protest but there's a certain time, place, and manner in which you should protest. I do let them go up to the line. I think it's a good learning tool. I believe in shared leadership, but there are certain lines that we have to stay within certain boundaries.

Three participants emphasized the relationship and communication with the program – the adviser and students – is vital to the overall mission of student-created media. Participant 2 stated, “I think the most important part is open communication from the get-go. The teacher leading the class has to be the responsible person.” Participant 5 stated, “I work very closely with our journalism teacher. We consult weekly – at least twice a week. We have some really good discussions that involve newspaper, yearbook, and recruitment.” Participant 6 stated, “I'm responsible for approving what their print is and what their proofs are. Sometimes, I delegate that, but essentially, I'm the one that oversees the budget for it. So, I work pretty closely with that person.”

Participant 5 is the only participant that directly mention not being comfortable censoring student work:

It's going to vary, you know, principal to principal, high school, different schools. I'm very liberal when it comes to what students are producing and what they're



putting out. I really am not comfortable censoring what students work on. I think they need to be given an opportunity of open and free expression and sharing. However, with that comes the caveat - that you have to really then accept responsibility for the impact that it can possibly have on others. And so, I haven't had that occur yet while I've been here. I've dealt with that in the past, but not here on this campus. I value the work that the student puts into it. And so the last thing I'm going to do is tell the teacher or the advisor this needs to be taken out. I'm not okay with it. I'll let the advisor know, but I meet with the student, and I have a conversation with the students, and we talk about.

Similarly, although Participant 2 did not explicitly state being uncomfortable with censoring student work, they supported the idea of free speech for students. “[I] make sure that the parents and community understand this is a student production. It’s what the students want. That’s up to the students as their creative outputs. That’s how they’re practicing for their future jobs.”

Understanding the role of student media and student voice in the school, administration can incorporate it as a natural part of school culture. If school leaders strive to center the voices of students in their schools, then they must embrace this core belief and create a school culture that nurtures it (Lac & Cummings Mansfield, 2018). For student voice initiatives to thrive within school settings, there needs to be a concerted effort made on the part of school administrators to value and support this work (Lac & Cummings Mansfield, 2018). Administrators must be comfortable with maintaining a sound educational environment while respecting students’ First Amendment speech and

expression rights in school, and confident in their decisions that affect this balance (Moreno, 2019; Ramey, 2009). The conversation lies with the role of high school media production programs in instilling the proper skills necessary to develop and disseminate media (Bulger & Davison, 2018), possibly shielding them from negative or controversial topics, versus an accurate scholastic journalism education.

### **Evidence of Trustworthiness**

#### **Credibility**

Credibility is directly related to the research design, instruments and data. This is achieved by structuring a study to seek and attend to complexity throughout a recursive research design process (Ravitch & Carl, 2016). The goal of triangulation is to seek out and engage with multiple perspectives to answer the research question (Ravitch & Carl, 2016). Therefore, I interviewed eight participants from diverse schools with an average of over 13 years of experience in administration. More so, the research committee reviewed the research design to ensure that it met the robust standard set forth by the university. Lastly, the data was transcribed in a word processing program and reviewed by the participant before it was used in the research. This is an important process that is used to strengthen the rigor and validity of qualitative research (Ravitch & Carl, 2016).

#### **Transferability**

Transferability is how qualitative studies can be applicable, or transferable, to a broader context while still mainlining their context specific richness (Ravitch & Carl, 2016). Achieving transferability includes having detailed descriptions of the data themselves. Thick description refers to the description of the study and the participants

(Ravitch & Carl, 2016). In this study, the anecdotes described by administrations can be relatable and applicable to schools across the southern state trying to examine their scholastic journalism programs. Because the discipline is not exclusive to the southern region of the southern state, the study can also be applied outside the southern state with administrators in similar settings, which increases the study's external validity.

### **Dependability**

Dependability refers to the stability of the data (Ravitch & Carl, 2016). All interviews were recorded, transcribed, and the transcription was approved by the participants before being used. A data log was kept to track when participants were contacted, interview scheduled, interviewed, how long the interview lasted, when the transcription was finished, when it was sent to the participant, and when the transcription was emailed to the participants for approval.

### **Confirmability**

The goal of confirmability is to acknowledge and explore how the researchers' biases and prejudices map onto interpretations of data. As mentioned, I was an adviser of student media for nine years. Therefore, my knowledge of the applicability of prior review and prior restraint is vast. I actively and critically monitored my bias and positionality by not disclosing my prior experience with any of the participants before and during the interview.

### **Summary**

In this basic qualitative study, I examined how campus administrators determine "legitimate pedagogical interest" when using prior review or prior restraint on high

school student-produced media. The problem is that the standard by which high school administrators determine “legitimate pedagogical interest” in using prior review and prior restraint is inconsistent. Chapter 4 presented the setting, the data collection, the data analysis, and the results of eight semistructured interviews with high school administrators conducted virtually using a video conferencing platform. Each participant were asked 10 questions, including demographic information, formulated to gather data on each administrator’s unique and specific experiences in their respective settings. Although Participant 3 replied and scheduled an interview, Participant 3 did not show up for the interview and did not respond to subsequent follow up emails.

After transcribing each interview, manually coding the data to create categories, and analyzing each transcript to develop themes, four overarching themes emerged that accurately reflect my data: determining legitimate pedagogical interest, using prior review to avoid conflict, external forces to gatekeeping, and support for student’s voice. Based on the data, participants said that determining "legitimate pedagogical interest" is ensuring that student-created media is factual, is unbiased, and aligns with district and state curriculum standards. Administrators decide to initiate prior review or prior restraint on high school student-created media because of the community, the current state of politics and current events, and district forces. Participants must establish "legitimate pedagogical interest" to initiate the prior review or prior restraint process. In Chapter 5, I will discuss the interpretation of the findings, the limitations of the study, recommendations, implications, and conclusions.

## Chapter 5: Results, Conclusions and Recommendations

### Introduction

The purpose of this basic qualitative research was to examine how campus administrators determine “legitimate pedagogical interest” when using prior review or prior restraint on high school student-created media. Qualitative researchers examine how individuals or groups perceive a phenomenon in their environments and make meaning through their experiences (Ravitch & Carl, 2016). Qualitative researchers view participants as experts on their own experiences and utilize data from individual perceptions to understand their relationship to the phenomena (Ravitch & Carl, 2016). Because a high school administration’s choices can differ based on a wide variety of variables, a basic qualitative approach was appropriate in this study in that it allowed participants to provide rich, specific, contextual, and unstructured data through semistructured interviews.

The concepts investigated in this study were prior review, prior restraint, and gatekeeping. Prior review occurs when anyone not on the student media staff requires that they be allowed to read, view, or approve student material before distribution, airing, or publication (Ewell et al., 2019). Prior restraint occurs when someone not on the student media staff requires predistribution changes to or removal of student media content (Ewell et al., 2019). Gatekeeping theory indicates that forces may either constrain or facilitate the passage of information through the gatekeeping process (Cassidy, 2006; Lewin, 1947). According to Shoemaker and Vos (2009), gatekeeping is the “process of culling and crafting countless bits of information into the limited number of messages

that reach people every day, and it is the center of the media's role in modern public life" (p. 1). The gatekeeper decides what information is disseminated. Therefore, the gatekeeper influences the school community socially, culturally, ethically, and politically. Through this process, the gatekeeper removes unwanted, sensitive, and controversial information. Because the standard of what "legitimate pedagogical interest" is differs from school to school, exploring the understanding behind administrative use of prior review on high school journalism programs and understanding the factors that affect administrators could help to establish policies that benefit students, journalism teachers, school administrations, and the discipline, which may advance the understanding of scholastic journalism.

Based on the data, participants said that determining "legitimate pedagogical interest" is ensuring that student-created media is factual, is unbiased, and aligns with district and state curriculum standards. Administrators decide to initiate prior review or prior restraint on high school student-created media because of the community, the current state of politics and current events, and district forces. Participants must establish "legitimate pedagogical interest" to initiate the prior review or prior restraint process. In Chapter 5, I discuss the interpretation of the findings, the limitations of the study, recommendations, implications, and conclusions.

### **Interpretations of Findings**

The research data extended the knowledge of how prior review, prior restraint, and gatekeeping are used in relation to student-created media. In 1969, *Tinker v. Des Moines* concluded that students do not shed their free speech rights in school. However,

in 1988, *Hazelwood v. Kuhlmeier* allowed school administrators to restrict speech by establishing prior review or prior restraint. Gatekeeping theory, as proposed by Lewin (1947), explains that forces may either constrain or facilitate the passage of information through the gatekeeping process (Cassidy, 2006; Lewin, 1947). The gatekeeper decides what information is disseminated. Therefore, the gatekeeper influences the school community socially, culturally, ethically, and politically based on their personal beliefs. The administrator overseeing journalism plays the role of the gatekeeper who can remove unwanted, sensitive, and controversial information (Cogar, 2021). The research question was used to attempt to fill the gap in practice by exploring how high school administrators determine "legitimate pedagogical interest" in the use of prior review or prior restraint on high school student-created media:

RQ1: How do administrators determine “legitimate pedagogical interest” in their decision to use prior review or prior restraint?

The four themes of this study were determining legitimate pedagogical interest, using prior review to avoid conflict, external forces to gatekeeping, and support for students’ voice.

In Chapter 2, I reviewed judicial precedent and the administration’s role in gatekeeping. *Tinker v. Des Moines Independent School District* (1969) set the standard that “it can hardly be argued that ... students ... shed their constitutional rights ... at the schoolhouse gate,” while *Hazelwood v. Kuhlmeier* (1988) introduced the use of prior review and prior restraint by school administrators if they can establish “legitimate pedagogical interest.” The data supported the conclusion that “legitimate pedagogical

interest" is ensuring that student-created media is factual, unbiased, and aligned with district and state curriculum standards. Participants must establish "legitimate pedagogical interest" to initiate prior review or prior restraint. The act of gatekeeping can be challenging at different levels because of many factors, such as political views and personal beliefs, or institutional views and/or beliefs (Steele, 2018). At the organizational level, which in this study's case was the administrator, the administrator gatekeeps based on the policy of the school or district, the culture of the community, or personal beliefs or opinions. At the social level, gatekeeping occurs when the student's work does not reflect the community's culture (Steele, 2018). Participants concluded that they decide to initiate prior review or prior restraint because of community, the current state of politics and current events, and district forces. At the individual level of gatekeeping, which in this study's case was the student, a student might not report on an assigned topic because of their own beliefs or might self-censor because of the beliefs of the organization or the community (Steele, 2018). The literature supported the idea that prior review-related policies may increase student self-censorship and influence journalism teachers' pedagogy out of fear of consequences (Farquhar & Carey, 2018). Although the *Tinker* decision concluded that students do not shed their free speech rights in school, the *Hazelwood* decision allowed school administrators to restrict speech by establishing prior review.

The literature also supported the value of a journalism education and student voice, which encourages students to see the importance of media literacy, civic engagement, and student leadership development, as well as the fundamental meaning of



the First Amendment (Bobkowski & Belmas, 2017; Bobkowski & Cavanah, 2019; Neely, 2015). A significant finding is that participants supported student voice within reason—as long as it did not cause conflict on campus or in the community. Noelle Neumann’s spiral of silence theory explains that people have an extrinsic trait dictated by the climate of public opinion and an internal desire to speak out based on social climate (Nicolini & Filak, 2022). It explains the process by which individuals choose whether to express their opinion on a controversial issue. However, that choice can be dictated based on fear, isolation, or reprimand by the administration. Therefore, individuals form a judgment about public opinion and use that information to predict how others (in this case, the school administration) would react if they expressed their opinions. Publication advisers and journalism students view controversial topics with wariness based on the level of their intrinsic need to self-censor. Students and advisers find reasons to avoid controversial topic coverage, even when they acknowledged that those topics were vital to the interests of the student media and the school community (Nicolini & Filak, 2022).

Few studies exist to compare the content of journalism programs from schools with open forum policies versus schools that experience some form of prior review or prior restraint, knowing the different levels of gatekeeping that can occur (Steele, 2018). Tolerance for student speech should not be rooted in administrative opinion or political stance, but rather in the students’ development. School officials ought to look at student speech with unlimited forbearance because there is value in student expression (Dhingra, 2019). Educators must defend freedom of expression and teach students to oppose political groups that advocate for unconstitutional censorship. Journalism teachers

possess a unique ability to improve society by providing accurate journalism pedagogy (Listopad & Crawford, 2018).

### **Limitations of the Study**

There were some limitations to this study related to the design and methodology. I spent nine years as an adviser of student media in the southern region of the southwestern state. I am a member of state and national academic scholastic journalism associations. This was addressed by not disclosing my work history and related associations when contacting administrators. To address the integrity of the study and any bias, participants were chosen solely from neighboring school districts, rather than the school district where I am employed. These limitations provide an opportunity for future research and expansion of the current research.

### **Recommendations**

Based on the results and limitations of my research, I would recommend that future research be conducted in different regions of the southwestern state. Although participants were administrators from a variety of campus sizes in terms of student population, an increased understanding of the use of prior review can be explored because different geographical regions and cultures produce different ideologies (Farquhar & Carey, 2018). Also, because this study focused on administrators, I would recommend looking at the impact of gatekeeping policies from the student and adviser perspective in that both advisers and students experience routine censorship from administrators that puts information, careers, and publications at risk (Farquhar & Carey, 2018).

Additionally, the study found that no participant received training in scholastic journalism or press law before becoming an administrator or during their principalship. The United States has deemed journalism vital in the overall process of representative democracy—it is the only profession mentioned in the U.S. Constitution (U.S. Const. amend. I). A variety of skills are taught in journalism programs, focusing on the basics of news judgment, writing, reporting, and technology (Listopad & Crawford, 2018). High-order skills such as self-direction, problem-solving, critical thinking, cooperation, confidence, and responsibility, which are desirable traits to employers, are taught in journalism programs. Research has focused on the role of scholastic journalism in student development, specifically on political awareness, connection to the community, academic performance, social relationships, news consumption, and journalistic knowledge (Vogts, 2018). Therefore, further research can be conducted comparing the administrative policies of those with knowledge and those without knowledge of scholastic journalism, the First Amendment, press law, and the impact on their respective journalism programs.

Lastly, nationally, the "New Voices" movement advocates for statutory protections at the state level. To date, 17 states have passed legislation codifying these protections and restoring student press freedom, with active campaigns in many others (Norins et. al., 2021). My last recommendation for future research is to study the impact of gatekeeping policies on schools with statutory protections versus those without.

Students' voice is beneficial for students, increasing self-esteem, self-efficacy, and school connectedness for those involved (Anderson et. al., 2022). The inclusion of students' voices in educational decisions aligns with a participative leadership style.

Students' voice helps students become more socially and emotionally competent individuals. Tolerance for student speech should not be rooted in administrative opinion or political stance, but rather in the students' development. Therefore, my recommendation for practice within scholastic journalism is to develop policies—locally and statewide—for authentic and ethical journalism pedagogy in student-created media where those policies do not exist. The Student Press Law Center has a model that protects “freedom of speech and freedom of press in school-sponsored media,” which has been model in numerous statutory protections at the state level (Norins et. al., 2021).

### **Implications**

The inclusion of students' voices in educational decisions aligns with a participative leadership style. This style involves administration giving opportunities for students to lead rather than all leadership and power residing with the principal (Barker, 2018). Students' voice helps students become more socially and emotionally competent individuals. Once relationships between administration and students are formed, it is easier for leaders to create a shared vision. If school leaders strive to center the voices of students in their schools, then they must embrace this core belief and create a school culture that nurtures it (Lac & Cummings Mansfield, 2018). For student voice initiatives to thrive within school settings, there needs to be a concerted effort made on the part of school administrators to value and support this work through policy.

This study helped advance the knowledge of scholastic journalism by defining what “legitimate pedagogical interest” is and addressing forces that lead to administrators using prior review. Overall, this study is important for social change and is relevant to

educational communities because the role of student speech and the First Amendment has changed a great deal in 50 years since *Tinker*. The Journalism Education Association (2015), the largest journalism teachers' association in the United States, has called student self-censorship widespread and destructive to students' ability to learn authentic journalism. More so, journalism teachers know that censorship is possible, so they may not assign proper instruction materials. They may feel punishment, threats, and possible termination ahead of themselves (Norins et. al., 2021). Student speech is more complicated and a great deal more nebulous than speech communicated via an armband, newspaper article, assembly speech, or poster (Herrmann, 2018). Policy must catch up to accurate pedagogy, professional practice, and 21<sup>st</sup>-century journalism.

### **Conclusion**

Since 1988, the impact of *Hazelwood v. Kuhlmeier* has been significant. The administrative ability to review, change, or remove student-created media undermines student journalists' First Amendment rights (Listopad & Crawford, 2018). Both advisers and students have experienced routine censorship from administrators that puts information, careers, and publications at risk (Farquhar & Carey, 2018). But there is value in an accurate journalism education and student voice, which encourages students to see the importance of media literacy, civic engagement, and student leadership development, as well as the fundamental meaning of the First Amendment.

The purpose of this basic qualitative research was to examine how campus administrators determine "legitimate pedagogical interest" when using prior review or prior restraint on high school student-created media. This study filled the gap in practice

by defining what “legitimate pedagogical interest” is and addressed forces that lead to administrators using prior review, advancing the overall knowledge of scholastic journalism. Limiting student journalists to writing only about safe and nonoffensive content not only deprives student journalists of accurate journalism pedagogy and having a voice, but also deprives their readers of the right to receive the information, opinions, and ideas. If the goal of educators is to provide quality education for all students in order to enable them to critically think, which includes instituting policies that allow them to voice that critical thought, whether it agrees with the administration or not. The conclusion of this study gives insight to assist in establishing policies that ethically, morally, and legally support and protect students, journalism teachers, and school administrations.

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## Appendix: Interview Protocol

1. Briefly describe your background as a high school administrator.
2. What role do you play (if any) being the administrator of the journalism program?
3. How do you determine “legitimate pedagogical interest” when reviewing student-created media?
4. Tell me about the review of student-created media by administrators on your journalism program.
  - a. How does your campus administration determine when to review student-created media?
  - b. Give me an example of when you reviewed student-created media before publication.
5. Tell me about the change or removal of student-created media by administrators to block the publication of something.
  - a. How does your campus administration determine when to change or remove student-created media?
  - b. Give me an example of when you changed or student-created media.
6. Tell me about any push-back (if any) that arose from reviewing, changing, or removing student-created media.
7. What sorts of opinions and issues (if any) do you think need to be balanced in overseeing a journalism program from students, parents, colleagues, and

community members?

8. What other persons get involved or who else is included in decisions about reviewing, changing, or removing student-created media?
9. What type of training, if any, does the administrator have in scholastic press rights laws, and from what institution or resource?
10. What more can you tell me about oversight of scholastic journalism?