By Electronic Mail

Vice President Rodney M. Layfield
Indian River School District Board of Education
31 Hosier Street
Selbyville, DE 19975

December 12, 2014

Dear Vice President Layfield and Members of the Board:

We wrote to you earlier this month regarding efforts to remove material from a proposed district-wide health curriculum. We write now in response to the removal of emily m. danforth’s *The Miseducation of Cameron Post* from library shelves in Sussex Central High School. We are gratified to learn that a review committee unanimously voted to restore the book to shelves, and that the Superintendent accepted that recommendation. However, we understand that the original complainant has appealed the decision and the matter is now before the Board. We hope that the Board will respect the judgment of its professional staff and reinstate the book. This decision would respect both the educational rights of students and basic First Amendment principles.

*The Miseducation of Cameron Post* is a highly acclaimed coming of age novel. It won the American Library Association’s Booklist Editors’ Choice Award for Youth in 2012. It was also selected for the 2013 Best Fiction for Young Adults list by the Young Adult Library Services Association, which recommends books for ages 12-18 that “meet the criteria of both good quality literature and appealing reading for teens.” This praise was echoed in starred reviews in *Kirkus Reviews, Publishers Weekly,* and *School Library Journal,* which described it as a “finely crafted, sophisticated coming-of-age debut novel [that] is multilayered, finessing such issues as loss, first love, and friendship.”

It is our understanding that the complainant’s objection to the book’s profanity formed the basis of his complaint. However, this does not justify the removal of the book. The language in any novel must be seen in the context of the entire work. An author’s broad moral vision, total treatment of theme, and realistic portrayal of characters and dialogue are ignored when complainants focus only on individual words that they may deem offensive. Profanity is often used by authors for important literary reasons: to convey emotion, add emphasis, express honesty, and communicate realism and authenticity.

Removing a book with educational and literary value also raises serious constitutional questions. Government officials, including public school administrators, are under a constitutional obligation not to remove, restrict, or suppress content because some members of the community object to or disapprove of it. The Supreme Court has cautioned that school officials “may not remove books from library shelves simply because they dislike the ideas contained in those books and seek by their removal to ‘prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion.’” *Board of Ed., Island Trees Union Free School Dist. No.26 v. Pico,* 457 U.S. 833, 872 (1982) (plurality opinion); accord *Minarcini v. Strongsville City Sch. Dist.*, 541 F.
2d 577, 581 (6th Cir. 1976) (access to books in library “is not subject to being withdrawn by succeeding school boards whose members might desire to ‘winnow’ the library for books the content of which occasioned their displeasure or disapproval”). This constitutional duty applies with particular force in the school library, which, unlike the classroom, has “a special role ... as a place where students may freely and voluntarily explore diverse topics.” *Campbell v. St. Tammany Parish School Board*, 64 F. 3d 184, 190 (5th Cir. 1995).

As a practical matter, acceding to the demands to remove something that one person finds objectionable invariably invites multiple, sometimes conflicting demands to exclude other material. The attempt “to eliminate everything that is objectionable ... will leave public schools in shreds. Nothing but educational confusion and a discrediting of the public school system can result ...” *McCollum v. Board of Educ.*, 333 U.S. 203, 235 (1948) (Jackson, J. concurring). In fact, any effort to remove books containing profanity or any content that some members of the community find objectionable would threaten such literature as *To Kill a Mockingbird* by Harper Lee, *Lord of the Flies* by William Golding, *The Great Gatsby* by F. Scott Fitzgerald, and *Native Son* by Richard Wright.

Nobody has to read something just because it is on library shelves. The Supreme Court has emphasized that “the regime of voluntary inquiry ... holds sway” in school libraries. *Board of Ed., v. Pico*, 457 U.S. at 869. No book is right for every student, and not all students would choose to read *Cameron Post*. The library is there precisely to allow students to have a choice of reading options, consistent with their interests, maturity level, and parental guidance. The removal of the book from the library, however, suggests that no students should read it, and may prevent students who lack funds to buy their own books from reading it. Students should have the opportunity to decide for themselves whether they want to read the book.

Without questioning the sincerity of the community member who objects to the books, his views are not shared by all, and he has no right to impose those views on others or to demand that the public library holdings reflect his personal preferences. We urge you to endorse the recommendations of both the committee and the Superintendent by returning *The Miseducation of Cameron Post* to the library shelves of Sussex Central High School, so that those students who wish to read it may do so. This result would show respect not only for intellectual freedom, but also for all members of the school community by allowing individuals to make reading choices based on their own views and values.

Please feel free to contact us if we can be of any further assistance.

Sincerely,

Joan Bertin, Executive Director  
National Coalition Against Censorship

Chris Finan, President  
American Booksellers Foundation For Free Expression

Charles Brownstein, Executive Director  
Comic Book Legal Defense Fund

Kathleen MacRae, Executive Director  
ACLU of Delaware

Judy Platt, Director  
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