

IS THE PROTECTION OF MINORITIES WORTH THE SUPPRESSION OF SPEECH?  
THE EFFECTS OF POLITICAL CORRECTNESS ON AMERICAN UNIVERSITIES AND  
COLLEGE CAMPUSES

by

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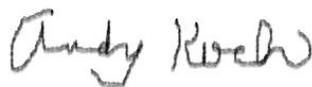
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## **Abstract**

This honors thesis is a brief study of the highly politicized debate over political correctness (PC). The study explores, through political and historical lenses, PC's impact on college and university campuses. Political correctness is argued to be a double-edged sword driven by the competing interests of equal rights and free speech for predominance in institutions of higher education. The intellectual foundations of political correctness are grounded in the theories of postmodernism, deconstruction, and the belief that language is power. Campus speech codes, multicultural studies, and trigger warnings on colleges and universities are tangible byproducts of the PC debate. This thesis affirms the importance of striking a balance between equality and freedom of speech on college and university campuses. Recommendations for how to achieve that balance are provided. The author advocates the need for additional research into the PC movement that goes beyond the current politicized debate.

## Introduction

I think the big problem this country has is being politically correct.

I've been challenged by so many people, and I don't frankly have time for total political correctness. And to be honest with you, this country doesn't have time either.

- Presidential Candidate Donald Trump  
2015 Republican Primary Debate

When responding to Fox News host Megyn Kelly during one of the 2015 GOP presidential primary debates regarding previous comments he made about women, candidate Donald Trump expressed displeasure characterizing her question as being motivated by political correctness. In the United States, political correctness is considered by many to be a controversial topic that is widely debated (Caesar 2017). As conveyed by his comment, President Trump sees political correctness as an issue that many Americans would prefer to ignore and continues to hold that belief into his presidency. At least 52 percent of Americans, according to a 2018 poll taken by the National Public Radio (NPR), would agree with Trump's disagreement about the country becoming more politically correct (Montanaro 2018). On the other hand, 38 percent of Americans are in favor of requiring people to be politically correct, based on the need to be more careful about the use of language to prevent offending people of different backgrounds. Thus, despite Trump's certainty of his view about political correctness, the country remains somewhat divided.

Political correctness (PC) is a complex concept that cannot be simply defined or has a meaning that is universally accepted. Some scholars describe PC as an effort to respect an

individual's identity, culture, and perspective on their own terms (Ohmann 1995, 17). Others disagree, believing the concept promotes the ideological narrowing, intolerance, and silencing of opposing language and views (Cummings 2001). Furthermore, if one only focuses on PC's involvement in higher education, many would understand it as a multitude of academic reforms that potentially threaten the academic integrity of colleges and universities (Friedman and Narveson 1995). Due to PC being a fluid term that has a different meaning depending on whether it is being promoted or attacked, the concept is nearly impossible to limit to a single explanation. However, despite there being countless attempts to define PC, a common thread is its involvement with language. The effects PC continue to have on language and speech drive much of the debate today.

The primary purpose of PC is to prevent the use of speech perceived as offensive or that exclude marginalized groups. Euphemisms and other verbal methods, namely censorship, are often used by followers of PC to avoid potentially offensive language (Hughes 2010). For example, rather than one using the term *handicapped*, a term that is regarded by some as offensive, the politically correct euphemism would be *differently-abled*.

Additionally, if an insulting term is censored in a social or educational setting, there is an expectation that individuals should create new politically correct terminology that is more appropriate. By changing speech using those methods, it is assumed that PC can change societal norms and behavior that are currently based on offensive stereotypes and ignorance. Supporters of PC would ultimately believe that they can change the way people react towards each other in a more positive manner.

Political correctness is disputed by many across the country, but most of the debate currently takes place in higher education institutions. Conflict surrounding the involvement of PC in higher education is all too often about its effect on an individual's freedom of speech in college and university campuses (Hughes 2010). Aside from disagreements about whether PC is impacting campuses either positively or negatively, the central question is whether it is acceptable or wise to limit speech in an environment that is supposed to support the pursuit of truth in order to protect the safety and feelings of all groups, especially minority groups. As a response to this debate, my thesis will explore the effects of PC on American universities and college campuses.

The first section will describe different theories that form the intellectual foundation for PC: postmodernism, deconstruction, and the proposition that language is power. This discussion will contain a brief background of the theories and how they relate to PC. By recognizing theories that contain ideas expressed within the concept of PC, it should be easier to unravel the concept as well as to why PC is important to language and rhetoric.

The second section will describe the modern history of PC. It will examine how different groups have promoted the idea of PC before it appeared in higher education campuses and how the meaning of PC has changed over time.

Section three will examine how PC impacts free speech at universities and college campuses. The focus will be on the effects that speech codes, multiculturalism, and trigger warnings have on speech within those educational spaces. Along with looking into court cases and examining school policies, this section will go in-depth into the effects PC had on education on college campuses.

Section four will highlight the general tension between PC and the freedom of speech. It will explore how the government has defined, promoted, and limited free speech while defining the boundaries of hate speech.

By examining the foundations of PC, its effects in universities and college campuses, and the conflict between PC and freedom of speech, this thesis aims to explain why PC is justifiable despite being recognized as a “double-edged sword” that limits some types of speech. It also hopes to provide a new outlook on this highly politicized debate and reaffirm the importance of striking a balance of PC and free speech in current society.

### **Literature Review**

There is much academic literature related to the concept of PC and the debate that has occurred over the years throughout the United States. Allan Bloom (1987) is one of the first to discuss PC effects on higher education in his nationally recognized work. Although he never mentions the term *political correctness*, he openly criticizes how elements of PC, such as deconstruction and postmodernism, are negatively affecting liberal education. Universities are by design intended to be a model of “true openness,” but due to the rise of cultural relativism, academic freedom in universities has eroded (Bloom 1987). Jung Min Choi and John W. Murphy (1992) studied the general discourse between supporters of PC and conservatives who are concerned about its damaging effects. In their view, PC supporters aim to change society by advocating pluralism and inclusivity while rejecting universal standards and truths. They note that conservatives argue that PC is totalitarian due to its stifling dissent and believe that order can only be sustained through strict enforcement of norms (Choi and Murphy 1992). Although Choi and Murphy cover both sides of the

discourse, they ultimately support PC, concluding that it is not totalitarian since it promotes openness and desires to enhance dialogue. Marilyn Friedman and Jan Narveson (1995) take a different approach. In a collection of responsive essays between them, with Friedman arguing for the use of PC and Narveson arguing against the concept, they concentrate on the positive and negative effects of PC on traditional western beliefs as a result of the introduction of multiculturalism on the Western belief systems, affirmative action, and speech codes.

Similarly, Jeffrey Williams (1995) has assembled a collection of essays by various academics discussing the differing views on the nature of PC in academia. Based on the constant mention of multiculturalism and speech codes, much focus was placed around the idea that the PC debate is a clash over individualism and group mentalities. Geoffrey Hughes (2010) approaches PC from a different perspective by analyzing in-depth its origins, progress, content, and style. While describing PC as a misnomer and a buzzword, Hughes acknowledges that the concept is a combination of freedom and constraint that focuses more on the context of language rather than the language itself. He highlights how the PC debate too often focuses on semantics and has dampened the use of free speech in discussions, particularly in academia, due to various agendas (Hughes 2010).

Although many scholars have commented on the PC debate from a general perspective, there are some who have concentrated on PC's effect on social transformation in society. Michael Cummings (2001) touches on how PC impedes beneficial social change from occurring in the U.S. due to the concept of prioritizing equality over liberty. Considering that PC legislates against words that may be harmful or offensive to others, he argues that the consequences chill debate and stifle diversity as people are becoming more

likely to refuse hearing arguments from groups they merely dislike (Cummings 2001). As a result, some conclude that PC is anti-transformational to civilization because serious debate and discussion are needed for societies to grow. Likewise, Angelo M. Codevilla (2016) describes PC as a movement similar to communism due to it attempting to create a culture of groupthink. He argues that PC is a concept made to give obedience to progressives, who are attempting to become America's new ruling class. Although it was recognized that PC has changed public norms, the concept overall hinders society as progressives use it to delegitimize all public discourse that undermines their opinions (Codevilla 2016).

Barak Orbach (2012) has a similar view as the arguments from Cummings (2001) and Codevilla (2016). He argues that PC causes social conformity on campus as students voluntarily limit their speech in public. Instead of promoting social transformation through open discussions, the coercion of liberal thought into society causes people with differing views to self-censor their opinions. William Deresiewicz (2017) concurs by stating that PC forces universities to adopt a "correct" set of beliefs, which prevents social change by not allowing students and teachers to possess different opinions. Ultimately, literature primarily focusing on PC's effect on social transformation has largely been from a negative standpoint.

However, Spencer (1994) counters the negative view of PC, saying that PC is a positive product of the collective construction and reconstruction of identity in America. Focusing on the multicultural movement, PC resulted from the liberation of oppressed groups and is thus a way for the oppressed to receive recognition of their suffering, which displays the social transformation America continues to face (Spencer 1994).

Obviously, scholars have approached the PC debate from many angles and have differing views on the concept.

### **Methodology**

In academic research, traditionally there are three primary methods that are used: quantitative, qualitative, and mixed methods (Creswell 2009). The quantitative method involves statistical analysis and collecting data from experimental designs and surveys to establish and test a defined hypothesis. In contrast, the qualitative method involves analyzing texts and images, as well as interpreting themes and patterns within the research. The mixed-methods approach is a mixture of quantitative and qualitative methods; the researcher collects multiple forms of data and analyzes both statistics and text in their study.

In this senior thesis, I will be using the qualitative method through political and historical lenses. Traditionally, political science research has used quantitative and scientific methods to test theories. Researchers also look at history to discover the structuring principles and conditions behind a governmental practice (Jones and Olson 1996). However, political science research currently involves a plurality of methods and approaches, such as utilizing analytical research or critical social theory. Any thoughts about politics are organized through ideologies and do not only depend on canonical texts (Leopold and Stears 2008). Although there are not any set expectations for successful research, by using a political lens, researchers are free to experiment and clear new paths as there are no strict guidelines to follow.

Contrastingly, historical research has conventionally been based on qualitative methods as it centered on primary records and narratives (Black and MacRaild 2000). Studies

stressed the importance of individuals and focused on the elite. However, after the Second World War, historical research shifted towards using quantitative methods and concentrated more on the population mass, economic growth, and social change (Hudson 2000). Some issues with quantitative history are that the collected data is not always reliable, it is difficult to categorize the human characteristics of people as a statistic, and historians can manipulate the data. Yet quantitative history can be beneficial when a statistically significant population is measured properly. The results can be more representative and accurate of the population than primary documents, which prioritize elites, were used. Despite the discourse within the historical community, historical research proceeds primarily through the interpretation of primary sources and secondary sources be grounded in primary sources. The object of historical research is to study the actions of human beings that have occurred in the past to determine patterns that can inform the future (Collingwood 2014). Ultimately, this senior thesis will incorporate both a political and historical lens to develop a sense of the history and nature of political correctness on university and college campuses in recent years (Leopold and Stears 2008).

The data within this thesis will be compiled from primary sources, secondary sources, and the news media. Student codes of conduct from various universities will be examined to see how speech codes affect free speech on campuses. The U.S. Constitution and some seminal Supreme Court cases will be explored to gain a better understanding of how the government has limited or expanded free speech and more recently established boundaries for hate speech. Information will be garnered from scholarly articles and books. Finally,

news articles will describe recent events that have occurred as a result of colleges and universities wrestling with PC on their campuses.

### **Section One:**

#### **The Intellectual Foundations of PC**

Despite PC being a complex concept, its foundation can be discovered in particular theories revolving in speech and language. From the ideas of language influencing social norms to prioritizing impact over intent, established theories from the past have inspired many groups and individuals to create the notion of PC that continues to revise the use of language today. For that reason, it is important to examine postmodernism, deconstruction, and the idea that language has and can promote power. The ideas taken from those theories will bring a deeper understanding of PC and explain how the concept managed to significantly impact society.

#### *Postmodernism*

Postmodernism is a philosophical movement that arose in the 1960s. It is accredited to the works of key 19th and 20th century French and German philosophers such as Jacques Derrida, Friedrich Nietzsche, and Martin Heidegger (Butler 2002). Contrary to modernism, which assumes that universal truths and clear worldviews can explain reality, postmodernism challenges the very idea of there being all-embracing claims to knowledge (Lyotard 2004, 123). Adherents of postmodernism argue that there are reasons to doubt global worldviews, such as liberal democracy and modern science since they are all based on assumptions that may or may not be true and were arguably the result of historical conditions and power relations (Rosenau 1992). Because of this, postmodernism advocates for the world to accept

pluralism and relativism as a way to further delegitimize master narratives. There is no unifying worldview to explain reality; instead, everything is up for interpretation. All narratives should have to compete for acceptance (Butler 2002; Hassan 1987). Rather than there being a single truth, there are multiple truths that can explain different people's personal reality. Inevitably proponents of postmodernism conclude that there can be no certainty of a single reality or truth. Consequently, postmodernists believe society must become comfortable with accepting the absence of certainty and must learn to live without explanations.

Similar to PC, there is no clear definition of postmodernism (Hassan 1987, 17). The movement involves components taken from multiple theories like French structuralism, phenomenology, Western Marxism, and Critical Theory. It also spans throughout literature, art, films, and culture. However, a key component of postmodernism is its lack of unity. Political scientist Pauline Marie Rosenau teases such thinking, saying: "No wonder its harmony is disrupted by argument: no wonder it is characterized not by orthodoxy so much as by diversity, competing currents, and continual schism" (1992, 14). Postmodernism is known for its diversity in thought and the promotion of intellectual disharmony.

Postmodernism is also characterized by its focus on individuality and self-awareness, especially in literature. As there is no single meaning to reality, postmodernist thinkers also argue that there is no single meaning to any text (Butler 2002). The role of the author is therefore diminished since the significance is placed on the reader and their interpretations of the text. This concept is intended to promote readers discovering their own interpretations of texts rather than depending on authors who have assumed privileges to the truth. As a result,

every text is open to multiple interpretations depending on the reader (Rosenau 1992). Every truth is subjective and is open to interpretation.

PC's views on reality are often associated with postmodernism (Choi and Murphy 1992). Both PC and postmodernism reject the idea of any unifying worldview. Similar to the postmodern belief that master narratives lead to the subjugation of lesser-known views, PC assumes that focusing on one majority perspective will repress the history and feelings of marginalized communities (Rosenau 1992). In part, the dismantling of the Western canon through the rise of multicultural thought in colleges and universities is the result of PC or vice versa. Multiculturalists also believe that every individual has their own perspective on life based on their cultural identity, and it must be considered of equal value in the search for truth.

Additionally, the political implications of postmodernism are essential for understanding PC. With there being no universal truth, all narratives must fight for validity and acceptance (Butler 2002; Hassan 1987). Due to this, postmodernists see language as being politicized since each competing claim represents a point of view that seeks validation. This political belief stems from postmodernists understanding historical context as shaping the constructs of political narratives. In Michel Foucault's essay "Nietzsche, Genealogy, History," traditional history is framed as primarily consisting of an established relationship between the eruption of an event and its necessary continuity through time (Foucault 1977). However, an "effective" history is one that recognizes events not as a decision or battle based on chance, but as a shift in power between forces. For that reason, postmodernists, from a political standpoint, find that texts with a historical context cannot claim a fundamental truth

because the framework used is based on power relations and not solely objective facts. As a result, language and history are both politicized. Considering that PC is essentially an idea to shift power to marginalized groups through the use of language and also rejects the notion of a singular worldview, it can be argued that some of the foundational underpinnings of PC are in postmodernism.

Another connection between postmodernism and PC is the emphasis on impact rather than on the intent of language. In postmodernism, the focus is placed on the reader and their interpretations rather than the author (Butler 2002). Likewise, PC is subjective by nature and values the effect of what was said rather than the intent of who said it. For instance, if a member of a minority group feels offended by the language a person uses, the priority is often placed on the feelings of the marginalized member rather than on discerning the intent of the individual who used the offensive language (Hughes 2010). PC ultimately aims to prevent the use of speech deemed offensive by marginalized groups. Frequently, what a person intends by their words or actions is often considered as irrelevant and without merit.

Finally, PC is linked to postmodernism by its lack of unity. While the application of PC is intended to stop the use of offensive language, there is often dissension between groups about what is offensive and what is not. The decision is entirely subjective (Friedman and Narveson 1995; Hughes 2010). This characteristic of PC is similar to the lack of unity within the postmodern philosophy or worldview, a product of a lack of intellectual grounding driven by multiple narratives that compete for acceptance.

Consequently, many assumptions from postmodernism have become part of the intellectual foundations of PC. Although PC is not solely based on postmodern thought, the

fact remains that the movement has highly impacted the concept of PC that is practiced today.

### *Deconstruction*

Deconstruction is a method of critical analysis that emerged in the 1960s from Jacques Derrida's *De La Grammatologie*, a piece written in 1967 that questioned the traditional values of signs, words, and writing. Dr. Vincent B. Leitch, a scholar of theory and criticism, once wrote a statement on deconstruction:

As a mode of textual theory and analysis, contemporary *deconstruction* subverts almost everything in the tradition, putting in question received ideas of the sign and language, the text, the context, the author, the reader, the role of history, the work of interpretation, and the forms of critical writing (Leitch 1983, ix).

Deconstruction is a method that counters the traditional beliefs of language and writing. According to Derrida, traditional linguistic theories always prioritized speech rather than writing due to the probable fact that spoken speech exists before the written word. However, he argues that writing needs to be appreciated more when analyzing text since it is the most ancient form of differentiation, articulation, and spacing (Benson 2014; Leitch 1983). After all, reading, writing, and speaking are all ways of conveying text, so verbal speech should not be the only method that is considered. This system of belief eventually evolved into deconstruction focusing on the importance of writing and interpretation.

At its core, deconstruction aims to undo the idea that writing can have a correct or single interpretation (Norris 1982). Interpretation is seen by followers of deconstruction as a

unity of meaning and a closure of reading. Texts are understood to hold an infinite number of meanings due to them being the primordial form of differentiation. Thus, having a written piece be limited to a single interpretation would hide the true value of the text. As a result, deconstruction denies privilege to any particular meaning of a text due to the belief that all writing is open to interpretation, an idea that is very similar to postmodernism (Feldstein 1997).

Adherents of deconstruction prefer to describe it as a process of interpretation rather than a mere concept because its intent is to demystify texts to find all the latent meanings within them. A significant factor of deconstruction is that it only focuses on the value of texts and their infinite meanings. Derrida once wrote: “There is nothing outside the text” (Norris 1982, 41). This text has been interpreted by many to mean that there is no reality outside the text, but in actuality, Derrida was pointing out the significance of context (Leitch 1983). Everything, including both spoken and written language, is based on a context, which varies between every individual. For example, when one uses the term “house,” depending on the context of the situation, a person could understand the word to mean something like a traditional home or a mansion. Due to this variety of interpretation, nothing is outside the inevitability of context. This reinforces the notion of there being a single correct or mutually agreed upon meaning to a text, and thus, explains why deconstruction involves the endless discovery of the hidden meanings within a text.

Generally, the formula for deconstruction is to repeat and undermine the text. Repetitively reading the same passage is arguably the primary approach of deconstruction as the action brings out the writing’s hidden interpretations. The discovery of multiple meanings

would consequently undermine the text by proving how unstable it is. In addition to weakening the text, repetitively reading passages is supposed to cause readers to misread the writing (Leitch 1983). Since all texts are subjective under deconstruction, it is possible for everyone, including the author, to misinterpret what they read when compared to how others felt about the reading. As a result, deconstructive reading is a continuous action since there is no limit to how many times a text can be read and no certainty about how many meanings a text holds (Norris. 1982). The formula ultimately highlights how texts are read subjectively and can have no set interpretation.

Deconstruction is often connected to PC due to its subjective nature. Considering that there is no objective standard for determining the offensiveness of speech, PC relies on marginalized groups to decide whether a term or phrase is harmful or not (Hughes 2010). As a result, every word can possibly be “politically incorrect” since the focus is on the feelings of minority groups rather than on the intention of whoever said the problematic term. For that reason, PC does contain the deconstructive aspect of subjectivity due to the undeniable fact that every group has their own beliefs about what qualifies as offensive speech. It displays how, similar to postmodernism, both deconstruction and PC values the impact of speech more than the intent by diminishing the role of the author or creator.

Aside from being subjective, PC has some roots in deconstruction due to its belief of plurality. Pluralism is seen as a part of postmodern thought from its rejection of a unifying worldview, but it also is a significant factor of deconstruction. Since deconstructive thought stresses the fact that there is no correct or singular interpretation of a text, it indirectly advocates for the idea of plurality, in which every opinion matters and be equally accepted

(Leitch 1983). PC also relies on plurality as it aims to make society more accepting of the idea of multiple narratives being correct. Followers of PC believe that any claim to a universal truth is in danger of becoming repressive to the lesser-known beliefs. Due to this, every narrative should flourish since every individual is different and cannot always adapt to a “cosmic” truth. It is upon this assumption within PC that the Western canon and belief systems are being contested in colleges and universities (Choi and Murphy 1992). Although this connection between PC and multiculturalism in education will be further discussed in the third section of this thesis, it still shows how the concept of PC has adopted its pluralistic characteristic from deconstruction. Ultimately, the beliefs of everything being subjective and pluralism makes deconstruction an intellectual foundation of PC.

#### *Language is Power*

The intellectual construct that language is power focuses on how power relationships are expressed through languages and, ultimately human practices. Its foundation can primarily be found in certain written pieces by Michael Foucault and Charles Taylor.

#### **Michel Foucault - The History of Sexuality**

The construct that language is power is heavily rooted in Michel Foucault’s book *The History of Sexuality*. Although a four-volume study of sexuality in the Western world, it contains information that is essential to one’s understanding of the power of language. A major point of Foucault’s study is “the repressive hypothesis” and how it impacted the discourse on sexuality. The repressive hypothesis stipulates that during the rise of the bourgeoisie in 17th century Europe, society shifted from being able to talk freely about sexuality to having those expressions be repressed and eventually forbidden (Foucault 1976).

The restrictions of speech in the public sphere during that period caused discourse on sexuality to be confined to the privacy of one's home and other accepted places of tolerance, such as brothels and mental hospitals. According to Foucault, this hypothesis continued into the 20th century, even throughout the sexual liberation movements in the 1960s and 1970s because discourse on sexuality was still limited to within the home and in the academic and psychiatric spheres (Taylor 2011). Ultimately, the repressive hypothesis has made the history of sexuality become a history of repression.

However, while Foucault acknowledges the impact of the repressive hypothesis, he questions, because of the paradox that is evident even today: why do people in the modern age talk so much about how the discourse on sexuality cannot be talked about (Pollis 1987)? From approaching the answer to that question, Foucault found that rather than solely accepting that the repressive hypothesis has led to discourse being silenced, one must also recognize that silence has created new forms of discourse. He once wrote:

Silence itself — the things one declines to say, or is forbidden to name, the discretion that is required between different speakers — is less the absolute limit of discourse, the other side from which it is separated by a strict boundary, than an element that functions alongside the things said, with them and in relation to them within over-all strategies...There is not one but many silences, and they are an integral part of the strategies that underlie and permeate discourses (Foucault 1976, 27).

Foucault believed that while silence limits discussion, it also is essential to creating new discourses. At the same time, the prohibitions on speech in the public sphere allow new groups to gain control over discourse, which is essentially a shift in power through language.

In addition to emphasizing the importance of silence, Foucault repeatedly acknowledges that in a discourse, what is said is equally as important as who says it (Pollis 1987). Language and knowledge become connected to power when those who determine what can be discussed also determine what information can be revealed. An example of this is how the bourgeoisie took control of the discourse on sexuality in the 17th century. Using their authority, they repressed discussions on sexuality in the public sphere, which consequently prevented the public from becoming more knowledgeable about the topic (Foucault 1976). Yet as the bourgeoisie controlled the sexual discourse in the beginning, by the modern period, the power moved from that group to others, like prostitutes and psychiatrists, who were in more private places of tolerance. As a result, a multiplicity of ways to talk about sexuality emerged as the new groups in power made their decisions about what should be discussed (Taylor 2014). For that reason, while power through language can lead to discourse being silenced, that silence can eventually create the atmosphere for an eruption of new conversations as the power is exchanged between groups.

Foucault's notion of language as power in *The History of Sexuality* (1976) is significant for understanding PC because it can be argued that attacks on PC are about social control (Choi and Murphy 1992). Advocates of PC are attempting to promote a society with language that does not exclude or marginalize certain groups. By promoting politically correct actions, such as introducing euphemisms and censoring certain words and phrases,

power would be transferred from the traditional majority to marginalized and minority groups. After all, a key factor of PC is giving marginalized and minority groups the authority to determine which speech is offensive or acceptable, similar to how the bourgeoisie had the power to control discourse on sex in the 17th century (Foucault 1976; Hughes 2010). When applied to the PC debate in colleges and universities, this battle over power through language can be seen from how liberals use speech codes, trigger warnings, and the dismantling of the Western canon as methods to gain control over conservatives who fight against the PC regulations on speech. Overall, Foucault's arguments on language as power allows one to have a greater understanding of why the PC debate is essentially a fight over control of language use.

### **Charles Taylor - The Politics of Recognition**

Another relevant piece of writing that displays how language is power is Charles Taylor's essay "The Politics of Recognition" (1992, 25-73). In his essay, Taylor argues that there is a link between recognition and identity. That link is a driving force in contemporary social movements, which includes the PC movement in colleges and universities (Nicholson 1996). He wrote:

The thesis is that our identity is partly shaped by recognition or its absence, often by the *mis*recognition of others, and so a person or group of people can suffer real damage, real distortion, if the people or society around them mirror back to them a confining or demeaning or contemptible picture of themselves (Taylor 1992, 25).

From this statement, Taylor acknowledges that the perceptions of others partially shape personal identities. The identities can be formed through dialogue or by contact within the public sphere. Based on Taylor's thesis, it can be understood that when someone falsely mischaracterizes an individual, this can be perceived as a form of oppression because that unrecognized person could internalize harmful beliefs that promote a distorted view of themselves. For instance, white society in the United States has historically projected a degrading image upon black people in the United States for centuries. The misrecognition then became a significant factor behind black Americans possessing feelings of self-deprecation that aids their oppression (Taylor 1992, 26). This concept also can apply to women due to the historical practice of males promoting the image of women being inferior to men, which has led to many having low self-esteem (Nicholson 1996). Both examples illustrate how recognition from others can impact one's perception of themselves. It overall highlights one of Taylor's key points in "The Politics of Recognition," which is that language, especially words, is directly connected to how people identify themselves.

Along with the importance of recognition of one's identity, Taylor also presents how there is now a need for equal recognition if there is to be a healthy democratic society (Taylor 1992). In the past, recognition was seen as a form of honor that was only attainable by some. Over time, the notion of honor has been replaced by the idea of dignity, which now means that recognition should be obtainable by all. As a result, more people are demanding to be recognized equally, especially in multicultural societies (Nicholson 1996). There is an emphasis on recognition being equally applied because refusing equal recognition can damage those who are denied it. When groups receive differing amounts of acknowledgment,

the one that receives less attention can believe they are second-class to the dominant group, which can demean their perceptions of themselves (Taylor 1992, 42). Thus, according to Taylor, having equal recognition ensures that the identities of groups will not be negatively distorted by the uneven withholding of recognition.

In “The Politics of Recognition,” Taylor states that there are two changes that arose from the growing politics of equal recognition: politics of universalism and politics of difference (Manning 1997). The politics of universalism is blind to the differences between peoples and groups, theoretically leveling the playing field of opportunity and access. It can best be compared to “colorblind” politics in which rights and entitlements are accessible to all equally regardless of their gender, race, ethnicity, or any other individual differences (Taylor 1992, 42-43; Manning 1997). On the other hand, while the politics of universalism focuses on what everyone has in common, the politics of difference brings attention to how each person is distinct from the other. It acknowledges that differences between peoples and groups are relevant to their entitlements (Nicholson 1996). Taylor’s politics of recognition is a combination of these two contrasting ideas because it concentrates both on what people have in common and what differentiates individuals from each other.

Taylor’s “The Politics of Recognition” contains ideas that continue to support the theory of language as power and are integral to understanding how PC came to be. Since a critical point of PC is avoiding the use of offensive language to protect minority groups, it can be said that it recognizes the power language has on a person’s identity. Taylor notes that parts of an individual’s identity are formed by others through the recognition they give, meaning that the language others use can impact how a person feels about themselves

(Taylor 1992; Nicholson 1996). Misrecognition is, therefore, oppressive to an individual since the demeaning statements can be internalized and distort their identity. The lack of recognition can also be damaging to identities as well due to the internalization of being inferior.

Considering that degrading epithets and works that portray groups in a negative image are known to cause distress, PC can be explained in part as a movement to prevent misrecognition from occurring. By making society more politically correct through controlling which words and phrases can be used, minority groups can be better protected from internalizing the negative misrecognition that could distort their identities. When applied to universities and colleges, PC is a proactive attempt to defend certain groups by creating speech codes preventing offensive language, promoting multiculturalism on campuses to make them more inclusive to diverse groups, and the development of trigger warnings in classrooms to help shield students from being exposed to troubling content (Choi and Murphy 1992; Friedman and Narveson 1995). The enforcement of these changes in university and college campuses is intended to ultimately save the identities of minority groups from being damaged by misrecognition. The proactive behavior of those actions shows the influence of Taylor's ideas of language impacting a person's identity and misrecognition on PC.

Another component from "The Politics of Recognition" that applies to PC and the notion that language is power is Taylor's politics of equal recognition (Taylor 1992, 42). There are two parts to the politics of equal recognition, which are universalism and difference, but PC is best related to the politics of difference, which acknowledges how

distinctions between people are related to their entitlements. Unlike the politics of universalism that notes what everyone has in common, PC focuses on the differences between individuals and groups that cause disparities in privilege (Choi and Murphy 1992). For example, although people living in the United States overall can take part in the rights of being American, followers of PC recognize that Americans from marginalized communities are not as entitled as Americans from certain groups in power. It is false to assume that everyone is on the same level since the differences between them do affect their entitlements and livelihoods. For that reason, PC does make an effort for groups in society to be respected equally due to its belief that it is unjust for one identity to be accepted more than another. It is from the hopes of shifting language use through euphemisms and censorship that more power and respect can go towards minority groups and their cultures (Williams 1995).

While preventing the use of speech that can be deemed offensive towards marginalized groups, PC also aims to ensure that every culture is respected equally through changing the curriculum in schools. Similar to Taylor's beliefs, supporters of PC know that the fight for equal recognition is necessary because recognition forges identity (Taylor 1992, 34). Respecting every culture can also help stop the oppression of groups as they do not have to face misrecognition. However, while it is incorrect to ignore everyone's differences for equal recognition, PC utilizes education as a proper method of acknowledging cultures and differences equally. This can be seen in the rise of multiculturalism in colleges and universities.

Multiculturalism is essentially the presence of several distinct ethnic or cultural groups within a society (Friedman and Narveson 1995). The term has often been used to

describe the diversity of groups in an area. Yet it is also used by advocates of PC as a movement occurring in higher education intended to promote an appreciation for others different from ourselves and to make faculty and students more inclusive in their relationships, practices, and education. It should be noted that in “The Politics of Recognition,” Taylor (1992) also recognized that multiculturalism in universities, especially in the humanities departments, is necessary since minority groups should be taught about their own cultures if there is to be equal recognition. Although it is not as apparent as controlling the speech used between people to prevent groups from being offended, multiculturalism is another form of language as power since whoever changes the educational curriculum takes control of what students learn. For that reason, using multiculturalism to change the educational curriculum provides them with power over the status quo and traditional teachings. Using that information and observing the spread of multiculturalism in universities from the 1990s to today, it is evident that Taylor’s work has impacted the PC movement.

Despite PC being a difficult concept and movement to pin down, there are specific theories and intellectual works that can be identified as the foundation of PC and its values. Postmodernism is the basis for PC beliefs rejecting unifying worldviews, emphasizing impact over the intent of language, and accepting that language can be politicized. It also describes why PC causes a lack of unity in society. Deconstruction explains the subjective nature behind PC and its belief of plurality in interpretations. From examining Foucault (1976) and Taylor (1992), their works reveal why PC views language as being a source of power. By

understanding those intellectual concepts, one can gain a better understanding of PC and why the debate over it currently has such an impact in colleges and universities.

## **Section Two:**

### **Glimpses of PC throughout Modern History**

Just as PC is complex and difficult to define, the use of the term throughout modern history is varied. In the United States, PC was mentioned as early as 1793 in the Supreme Court case *Chisholm v. Georgia*, 2 U.S. 2 Dall. 419 419 (1793). The case focused on the legal question of whether a citizen could sue a state government in federal court. In the Court's opinion, Justice Iredell wrote:

Sentiments and expressions of this inaccurate kind prevail in our common, even in our convivial, language. Is a toast asked? 'The United states,' instead of the "People of the United states," is the toast given. This is not politically correct (*Chisholm v. Georgia* 1793, 462).

Although the decision of the case would be later overruled based on the 11<sup>th</sup> Amendment, Justice Iredell's statement shows how in the 18th century, PC was taken in its most literal sense. Being politically correct meant one who followed favorable political ideas of the time.

Political correctness in the United States today is primarily a "left-wing" movement. Its beginnings can be traced back to the 1960s. The 1960s were a time of great social change in the United States due to the civil rights and feminist movements that were taking place. During that period, PC was promoted by the American New Left, which consisted of left-wing activists who fought for a broad range of issues like civil rights, gay rights, and drug reform (Hughes 2010). It is not certain how the term was adopted by the New Left, but

some guess that the adjective “correct” could have been taken from Mao’s *Little Red Book* since many radicals at the time were known to read his work (Weigel 2016). Yet while Mao used PC as an ideological approach to program his followers, the New Left activists employed the term in a more jovial matter. From the late 1960s to the 1980s, the meaning of PC shifted from strictly following a defined ideological orthodoxy to being employed as a joke between leftists whenever they felt that their beliefs were becoming too dogmatic (Feldstein 1997; Hughes 2010).

During that period, the term PC was almost exclusively used by the American Left as a self-critical satire against their own orthodoxies of social change. For instance, in 1970, Toni Cade Bambara, an African American activist and author, wrote in *The Black Woman*: “A man cannot be politically correct and a chauvinist too” (Hughes 2010, 63). Bambara wrote that statement to express that while her male friends thought they were “politically correct” and full supporters of the feminist movement, they still failed to recognize the plight of black women. PC thus was a phrase used to jokingly identify people who appeared to support a cause excessively without a personal stake in its outcome. After all, one of the ways activists of the New Left distinguished themselves from the Old Left was that they were not trying to be dogmatic (Weigel 2016). Due to this, the New Left, feminists, and progressives used the phrase PC throughout the 1970s and 1980s as various social movements were occurring in the United States.

In the 1980s, the phrase PC was defined in a different way by conservatives. They used the term to describe liberal positions they opposed, characterized as being too rigid or dogmatic (Clapp et al. 2011). The belief of PC being a “left-wing” movement can be largely

attributed to the conservatives of the 1980s. It should also be noted that during that time, media coverage of PC began to increase as more people became aware of the phrase. In fact, an early instance of “politically correct” being abbreviated to PC was in a *New York Times* article in 1986 (Hughes 2010). In response to dealing with the rise of nonexclusive language at a church, Jeffrey Vamos, a man interviewed in the article said: “It avoids the issue because if you're dealing with your sexuality in a political way you're not dealing with yourself as a person. There's too much emphasis on being P.C. - politically correct” (Black 1986, 30). Vamos’ statement brings to light that PC was beginning to be associated with the idea of shifting words to not exclude groups, which is how PC is generally accepted in our society today. Overall, since the 18th century, PC has evolved over time into the politicized and progressive movement today. However, while PC was newly established in the late 1980s, the debate between liberals and conservatives over the definition would not truly begin until the 1990s.

PC and the debates surrounding it did not become widespread until the conservatives used it as a rallying cry in their movement. From their perspective, PC was the large-scale effort to get rid of offensive language and practices and to expand educational studies to include multicultural perspectives that have traditionally been disregarded (Clapp et al. 2011). An important observation from the conservative’s perspective of PC is that while multiculturalism was often seen as a separate concept from PC in the past, the conservative movement would include multiculturalism as part of the PC movement. Consequently, today multiculturalism is considered to be an integral part of PC.

The PC controversy was arguably initiated by a number of significant conservative bestsellers that targeted and criticized American higher education. Publications, such as Allan Bloom's *The Closing of the American Mind* (1990), Roger Kimball's *Tenured Radicals: How Politics Has Corrupted Our Higher Education* (1990), Lynne Cheney's *Tyrannical Machines* (1990) and Dinesh D'Souza's *Illiberal Education: The Politics of Race and Sex on Campus* (1991) brought public attention to the emerging dissent to the changes occurring in American colleges and universities (Hughes 2010). These conservative writings can partially be attributed to Stanford University's decision to drop its required course "Western Civilization" and replace it with the multicultural course "Culture, Ideas, and Values" that included at least one non-Western culture and works by women, minorities, and people of color (Bernstein 1988; Hughes 2010). Stanford's decision sparked a national debate and encouraged other universities to change their curriculum to become more multicultural. Universities also started attempting to enact speech codes in the early 1990s to protect minority groups from offensive speech. As a result, conservative authors like Bloom and Kimball wrote bestsellers criticizing higher education, which caused the issue to become more important to the public at large.

If one searches on ProQuest, a digital database of US newspapers and magazines, the phrase "politically correct" rarely appears before 1990. In 1990, the phrase appeared more than 700 times. The following year, there were more than 2500 instances. The number of times "politically correct" was mentioned then grew to more than 2800 in 1992 (Weigel 2016). From looking at ProQuest, it is evident that attention on PC exponentially increased in the early 1990s. Although there were supporters of PC who understood how the movement

benefited women and minorities on campus, PC was sometimes regarded as the “thought police” that terrorized students and faculty on campuses and frequently compared to totalitarianism and fascism (Hughes 2010).

During that period, the mass media highly focused on controversies that revolved around universities attempting to make their campuses more welcoming to minorities and women through actions such as speech codes and more multicultural courses (Nielson 1995, 60). Conservative outlets largely opposed those changes for reasons of censorship and deviation from the status quo. In contrast, liberal sources were in favor of them as the actions made campuses more inclusive. PC was also brought into the entertainment industry as comedy acts and TV shows like Bill Maher’s *Politically Incorrect* portrayed PC as a satirical premise to use when they want to discuss offensive or controversial topics.

Along with PC being viewed as a totalitarian movement in the 1990s, the conservatives on the right also pushed the idea that the left dominated colleges and universities. Considering that conservatives in the 1980s believed that PC was a left-wing driven movement, elements of a newly expanding conservative media on the radio and cable television argued that higher education institutions, particularly the liberal arts disciplines, were dominated by the implementation of new multicultural policies and speech codes (Hughes 2010; Clapp et al. 2011). However, that argument fails to consider how conservatives on the right have dominated academic disciplines like business and the applied sciences (Nielson 1995, 64). Also, the mass media, which is overwhelmingly run by people who received education from colleges and universities, deny even today that these

institutions possess a liberal bias. Today, the liberal left and conservative right media outlets and listeners continue to disagree on these points.

By the end of the 1990s and into the early 2000s, the PC debates faded from public view and were replaced by arguments related to terrorism and resentment of cultural groups (Bump 2015). It would not be until around 2012 when discussions about Black Lives Matter, gay marriage, and movements against sexual violence that PC began gaining primary coverage again. Yet rather than hearing buzzwords like “politically correct” and “multiculturalism,” Americans discovered “trigger warnings,” “safe spaces,” and “microaggressions” on campuses (Weigel 2016). These new terms would eventually be adopted as part of the PC movement and would further cause PC to be understood as a movement that prevents people from saying statements that could be offensive.

Ultimately, PC is a concept that has shifted meanings over time. From it first being used in an 18th century Supreme Court case to it currently being considered as a left-wing movement on language in higher education, PC has become both a vague buzzword that invites debate and a concept that has affected our daily language use.

### **Section Three:**

#### **The Effects of PC on Colleges and Universities**

There is currently little agreement as to whether PC has impacted college and university campuses, for better or worse, partly because of disagreement over its definition and purpose based on a person’s political or philosophical predispositions. It is a complicated concept. This thesis, however, will examine three significant effects of PC: speech codes, multiculturalism, and the rise in trigger warnings. By observing these changes in colleges and

universities, it will illustrate how PC today is not just an idea, but has become a movement that has undeniably affected the use of language in higher education.

When inspecting the three effects of PC, one should bear in mind that two distinct sides of the PC debate are present: PC advocates and critics of PC. The supporters of PC are predominantly liberals who argue that one's First Amendment freedoms must be restricted to further promote equality. On the other side of the issue are critics of PC who hold conservative beliefs and prioritize the constitutional right of free speech over equality on campuses.

### *Speech Codes*

Speech codes are essentially rules or regulations that prohibit expressions that are not constitutionally protected by the First Amendment. They are typically utilized in colleges and universities to either restrict or punish students who use racist, sexist, homophobic, or other hate speech to insult others (Friedman and Narveson 1995). Ironically, despite many campuses having speech codes today, only a few university policies make references to a restriction on speech. Instead, speech codes are more likely to be labeled as a less troublesome term and placed within policies that students may or may not read, such as anti-harassment policies, policies prohibiting disorderly conduct, and policies concerning computer use (Bobbitt 2017). Speech codes are created with the intent to reduce and ultimately eliminate offensive speech on campuses, making them an integral part of the PC movement.

### **History of Speech Codes**

Speech codes appeared in higher education partially as a response to the significant increase of women and minorities on campuses which was made possible by the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972. During that period, the federal government through affirmative action and other means pushed colleges and universities to improve the diversity of both faculty and student populations on their campuses. This development created new tensions as incidents of racist, homophobic, and sexist harassment increased following the growth in diversity on campuses (Lukianoff 2008; Aichinger 2009). Considering that some people viewed hate speech directed specifically at these populations as an expression that negatively affected equal opportunity in education for students and faculty, speech codes were the primary vehicle used to counter the marginalization of persons of color and women.

Beginning in 1987, schools like Stanford and the University of Michigan adopted hate speech regulations on their campuses (Sheill 1998). Their actions sparked a nationwide push for speech regulations on U.S. campuses, and by 1992 more than three hundred schools had similar codes. This eruption in speech laws caused colleges and universities to struggle with finding a balance between protecting the value of free speech and providing a “comfortable learning environment” for minorities and women. For instance, a speech code from the University of Wisconsin in 1989 valued the impact on minority students over free speech as the Board of Regents expelled any student caught “hurling racial epithets in a threatening manner” (Bobbitt 2017, 119). The rule later was softened to discourage and educate rather than punish racially offensive speech. Schools like the University of

Wisconsin, which had prioritized the impact of hate speech over freedom of speech, eventually were attacked relentlessly by critics for decades.

Although the number of colleges and universities with some form of a speech code greatly increased during the 1990s to today, there was still much pushback to regulating speech on campus. Particularly using the political and legal fields, many critics of PC and speech codes either attempted to create legislation to ban speech codes or brought the issue before the courts in hopes of the codes being found as unconstitutional. For instance, in 1991, Republican Representative Larry Craig from Idaho introduced the Freedom of Speech on Campus Act, which would have permitted the Department of Education to withhold federal funding from colleges and universities that prohibited speech “otherwise protected by the U.S. Constitution” (Bobbitt 2017, 120). The bill never made it to the floor of the House of Representatives because it was difficult to convince Congress that there were enough Americans concerned about the negative impact of speech codes.

Additionally, during the same session as Craig’s Freedom of Speech on Campus Act, Republican Representative Henry Hyde from Illinois introduced the Collegiate Speech Protection Act of 1991, a more narrowly tailored speech bill that would have been an amendment to the Civil Rights Act of 1964. The legislation would have given students at private institutions the same level of First Amendment protection as public schools. The American Civil Liberties Union (ACLU) supported the bill, but it was ultimately killed in the House due to Members of Congress opposing government interference with the operations of private institutions and the belief that hate speech incidents were not occurring on private and public campuses at a rate the required governmental intervention (Bobbitt 2017). Both

legislative measures, which were not passed, illustrate how critics of speech codes were intent on preventing the over-regulation of speech through federal legislative means.

Since the late 1980s, multiple speech codes have been struck down by the courts (Lukianoff 2008). To critics of speech codes, bringing speech codes to the courts has been viewed as the most effective method to stop their expansion on campuses since many campus speech codes have been ruled unconstitutional based upon the First Amendment.

### **Campus Speech Code Cases**

When discussing how the law has affected the use of speech codes, there are three court cases that appear time and time again. One of the earliest and most significant cases involving campus speech codes is *Doe v. University of Michigan*, 721 F. Supp. 852 (E.D. Mich. 1989). The origin of this case began in 1987 when the University of Michigan created a speech code, formally titled “Policy on Discrimination and Discriminatory Harassment.” This policy prohibited individuals from “‘stigmatizing or victimizing’ individuals or groups on the basis of race, ethnicity, religion, sex, sexual orientation, creed, national origin, ancestry, age, marital status, handicap or Vietnam-era veteran status” (*Doe v. University of Michigan* 1989, 853). The year after the speech code was adopted, John Doe, a psychology graduate student using a pseudonym for anonymity, challenged the constitutionality of the policy despite not being prosecuted. Assisted by the ACLU, he claimed that his open discussion of the biological differences between races and sexes would eventually be penalized under the policy. In effect, he argued, the speech code violated his free speech as some arguments would no longer be tolerated (Shiell 1998; Bobbitt 2017).

The federal court ruled in Doe's favor, stating that the regulation was vague and overbroad based on its use of terms, such as "stigmatize" and "victimize," that were difficult to define. Additionally, the judge stated that while the university was admirable for trying to create a "comfortable learning environment" for its students, the code could still be misused to limit disfavored opinions (Bobbitt 2017, 130). This case would raise much public attention on campus speech codes, to the point where President H.W. Bush would address the University of Michigan graduates in May 1991 about speech codes and the First Amendment. In his speech, President Bush warned:

The notion of political correctness has ignited controversy across the land...What began as a crusade for civility has soured into a cause of conflict and even censorship. Disputants treat sheer force -- getting their foes punished or expelled, for instance -- as a substitute for the power of ideas (Reuters 1991, para. 5).

In his statement, President Bush was arguing that speech codes were an attack on free speech on college campuses because they limited speech rather than promoting free expression. The fact that he expressed those beliefs at the University of Michigan illustrates the impact *Doe v. Michigan* had on speech codes and the PC debate at the time. The case would also cause many schools to either drop or revise their speech codes to something legally acceptable.

A second case that is often cited is *UWM Post v. Board of Regents of the University of Wisconsin*, 774 F. Supp. 1163 (E.D. Wis. 1991). In response to several racially insensitive incidents, including a fraternity fund-raiser called "Slave Auction" where students wore blackface and did menial work for other students, the University of Wisconsin System

adopted a plan to increase minority representation among the 26 campuses across the state. The plan included a speech code that prohibited speech that demeaned the identity of an individual or created a hostile environment for education (*UWM Post v. Board of Regents of the U. of Wis.* 1991, 1165). This policy was much clearer and narrower in scope than the University of Michigan's speech code. It specifically excluded comments made in classrooms and was created on the belief that words creating a hostile environment were "fighting words," not protected under the First Amendment. However, when the policy was challenged by students, a federal district court once again found the speech code to be overbroad, and excessively vague (Lukianoff 2008). The speech code also did not meet the fighting words doctrine.

This case is noteworthy because it limits the breadth and scope of speech codes today (Bobbitt 2017). In fact, nearly all speech codes today are created based on the judicial decisions on hate speech and fighting words. The court identified three features that narrowed the fighting words doctrine as applied today. First, a court can consider fighting words only if they are likely to result in a breach of the peace. Second, words that "are likely to cause a breach of the peace" are ones that are highly likely to cause imminent violence (Shiell 1991, 79). Third, the court decreed that the words must be directed at a specific individual. The district judge's statements on fighting words in this case often are used by critics of PC to limit the definition of "fighting words" when applied to speech codes in colleges and universities.

A third seminal case that is key that helps one to understand the constitutionality of speech codes is *Robert Corry et al. v. Leland Stanford Junior University*, No. 740309 (Cal.

Super. Ct. Feb. 27, 1995). In contrast to the other two cases, this case involved a private university. In 1988, Stanford University faced several racial incidents. One involved white students drawing a black caricature on a statue of Beethoven and placing it near the African-American themed dormitory. As a result, Stanford issued a policy in 1990 on “harassment by personal vilification,” which prohibited speech intended to insult or stigmatize an individual “on the basis of their sex, race, color, handicap, religion, sexual orientation, or national and ethnic origin” (Shiell 1991, 88). After four years, students sued the university claiming the policy chilled open discussion of important issues, which would damage the quality of education at Stanford University.

Despite the university’s arguments that the policy only targeted fighting words, California’s Superior Court ruled that Stanford’s policy was overbroad, content-based, and viewpoint-based (FIRE, n.d.). Yet since Stanford is a private university, the fact that a judge found their code to be unconstitutional usually would have had no legal force on its own. For that reason, this case becomes special as the court relied on California’s Leonard Law, which gives students who attend private institutions the same free speech rights as those attending public institutions (Lukianoff 2008). *Robert Corry et al. v. Leland Stanford Junior University* provides a means for those detractors to attempt to either eliminate or minimize speech codes today in both private colleges and universities.

Ultimately, antagonists of speech codes have proven to be extremely successful at limiting the impact of speech codes on campuses. Even without a uniform definition of what constitutes free speech, the courts have often found speech codes to be unconstitutional due to being overbroad. However, despite the success of critics of PC in the federal courts, the

fact that speech codes increased rather than decreased after the court rulings in the 1990s shows that a mutually agreed-upon set solution has not been found. Many people and schools continue to support speech regulations.

After looking at the history of speech codes from its creation to the multiple legal challenges, there needs to be a deeper examination of why groups either support or disapprove of speech codes. There is no clear consensus on speech codes, but by understanding the arguments of both supporters and critics of speech codes, one can perhaps gain a deeper understanding of PC.

### **Arguments for Speech Codes**

The primary characteristic of advocates of speech codes is that they prioritize equality over freedom of speech. Enforcing legislation against words that wound or are demeaning to others is a necessary and justifiable effort to ensure that women, minorities, and other populations who traditionally have been marginalized are justly treated on university and college campuses (Cummings 2001). There are three principal arguments used by PC advocates to justify speech codes. The first argument is centered on deterrence. In the most abstract form of this argument, campus hate speech is viewed as causing serious harms that constitute a violation of the Equal Protection Clause of the 14<sup>th</sup> Amendment. Because violations of the Equal Protection Clause should be punished and deterred, campus speech codes designed to prevent and punish hate speech are justified (Shiell 1998).

The deterrence argument typically focuses on the consequences of hate speech rather than the act itself. Instead of contributing ideas to a discussion, the sole aim of hate speech is to wound the listener as epithets or abusive language are used. It is often intended to

humiliate and attack the identity of those who are targeted (Wolfson 1997). As a result, many studies are indicating that hate speech causes feelings of humiliation, self-hatred, isolation, and even mental illnesses like depression to its targets (Wolfson 1997; Greenawalt 1995; Shiell 1998). It is due to the harmful effects of hate speech that advocates of PC argue that it needs to be deterred on campuses, particularly from the disproportionate impact on women and minorities.

It is commonly accepted that hate speech most often is directed at members of historically disadvantaged groups as a way for the dominant group to express power. This can be seen in the number of incidents involving hateful harassment that increased during the 1980s following the growth of diversity on university and college campuses (Greenawalt 1995). Along with being the primary targets of hate speech, minorities also have more deleterious effects when dealing with hate speech than historically dominant groups do. Racial minorities are often “programmed” to fail through feelings of inferiority caused by the presence of systemic racism throughout the United States. As targets of hate speech, they are more likely to feel powerless, develop feelings of self-hatred, and choose to silence their thoughts on campus (Wolfson 1997). Due to the disproportionate impact hate speech has on historically disadvantaged groups than those in power, advocates argue that speech codes are necessary to prevent hate speech on campuses that prevent students from having equal opportunity and create disparities in education..

The 14<sup>th</sup> Amendment guarantees that every citizen has equal protection under the law. If some groups are being affected by hate speech incidents more than others, it is hard to believe that students can experience an equal educational opportunity when they are being

harassed because of hate speech (Shiell 1998). Opponents of speech codes may argue that education and counter-speech can naturally stop hate speech incidents on campuses, but to PC advocates, those actions are not enough. Hate speech incidents continue to rise as diversity on campuses increases, so there must be additional action to stop them (Bobbitt 2017). Consequently, speech codes are an essential component in the fight against discrimination. Although it does suppress some kinds of speech, speech codes are justified as a deterrence to speech that violates the Equal Rights Clause of the 14<sup>th</sup> Amendment.

The second argument used by advocates of speech codes focuses on the First Amendment. In their view, hate speech, when properly defined, has little to no First Amendment value and does not deserve protection. The two models generally used in this argument are the “fighting words” doctrine and the “group defamation” doctrine (Shiell 1998). The fighting words model appeals to the apparent fighting words doctrine first introduced in *Chaplinsky v. New Hampshire* 315 U.S. 568 (1942). The Supreme Court upheld a state ban on fighting words “which by their very utterance inflict injury or tend to excite an immediate breach of the peace” (*Chaplinsky v. New Hampshire* 1942, 572). The Court ruled that fighting words are not protected under the First Amendment as they do not contribute anything to the exposition of ideas and are of little social value (Greenawalt 1995; Bobbitt 2017). Since *Chaplinsky* has never been overruled, advocates using the fighting words model argue that universities are justified in prohibiting fighting words through speech codes when speech is used to deny students equal educational opportunities.

In contrast, the group defamation model leans on the group libel doctrine established in *Beauharnais v. Illinois* 343 U.S. 250 (1952). The Court upheld an Illinois group libel

statute that made it illegal to publish any writing or image portraying the “depravity, criminality, unchastity, or lack of virtue of a class of citizens, of any race, color, creed or religion” (*Beauharnais v. Illinois*, 1952, 251). Like all state laws banning group libel, the Illinois legislature repealed the statute, causing many to abandon this model. However, since the Supreme Court has never directly overturned the group libel doctrine, some scholars advocate for speech codes that punish those who use hate speech to libel or defame protected groups. Overall, while advocates differ on which legal model should be used, many agree that the deterrence argument applied to the First Amendment argument can be used to justify speech codes on campuses (Shiell 1998).

The third principle argument supporting speech codes relates to the university mission. The basic idea is that hate speech is inconsistent with the goals of a university. There are often multiple aims that colleges or universities want to accomplish on their campuses. PC advocates consistently highlight the objective of promoting racial and sexual equality (Aichinger 2017). With the assistance of the 14<sup>th</sup> Amendment along with a multitude of federal and state statutes, universities are obligated to maintain an environment hospitable to minorities and women to ensure that they are provided an equal education when compared to members of historically privileged groups (Shiell 1998; Bobbitt 2017). For this reason, campus speech codes are justified because they help universities punish hate speech, which protects students against harmful speech and thereby improve their chances of getting an equal education.

Critics of PC often argue that speech codes should not be allowed on campuses because they are inconsistent with the university’s aim to promote a “marketplace of ideas”

that should not be restricted by regulations (Nielson 1995, 71; Williams 1995). However, PC advocates counter that speech codes are in fact consistent with the speech marketplace approach since hate speech distorts the marketplace by muting or devaluing the speech of minorities. After all, permitting hate speech reduces the amount of speech in the “marketplace of ideas” because the implicated threats in hate speech can silence minorities (Shiell 1998).

Additionally, some advocates point out that the speech marketplace has never been totally *laissez-faire*. Universities regularly control the speech of students and faculty by such actions as limiting the topics taught in a classroom and requiring civility in class discussions and open forums (Sunstein 1993). Having speech codes prohibiting fighting words will not jeopardize the free trade of ideas on campus any more than other accepted speech regulations do. Overall, speech codes that are narrowly tailored are justified because they can deter hate speech that disproportionately affects women and minorities, targets speech that has little or no First Amendment value, and are consistent with the educational aims of the university (Shiell 1998; Bobbitt 2017). As a result, the deterrence, First Amendment, and university amendment arguments explain the main reasons why people support speech codes.

### **Arguments Against Speech Codes**

On the other side of the PC debate, critics of speech codes are known to prioritize the value of freedom over the value of equality. Critics of speech codes often consider any kind of speech regulation to be an unconstitutional violation of an individual’s right to free speech (Shiell 1998). They believe that an individual’s freedom of speech should not be infringed

upon for the sake of making minorities comfortable on campus because the bar for deciding which speech is dangerous rather than merely offensive, is set too low.

A legal rationale that supports their claim is that campus speech codes often ignore changes in the scope of free speech protections in more recent Supreme Court rulings. For instance, one categorical exception to free speech, originally employed by the Supreme Court, defined “fighting words” as those, which “by their very utterance inflict injury or tend to incite an immediate breach of peace” (*Chaplinsky v. New Hampshire* 1942, 573). In *Gooding v. Wilson*, 405 U.S. 518 (1972), however, the Supreme Court expanded free speech protection by limiting the application of the “fighting words” exception to communication having “a tendency to produce an immediate and violent reaction rather than the offensiveness of the language used” (Parker, n.d, para. 5).

Similarly, in *Hess v. Indiana*, 414 U.S. 105 (1973) and *Eaton v. City of Tulsa*, 415 U.S. 697 (1974), the Supreme Court ruled that words that incite a breach of the peace must be such that the “average person” almost certainly would respond with immediate violence. In *Cohen v. California*, 403 U.S. 15 (1971), the Supreme Court became even more focused, holding that fighting words must be directed *at a specific individual* in a face-to-face encounter. Following this line of legal decisions, to be constitutionally acceptable, a campus speech code using the fighting words doctrine must only apply to speech that is likely to cause immediate violence and directed at a specific individual. Critics of speech codes believe they often are not tailored narrowly enough to meet these judicial requirements and therefore should be considered unconstitutional (Shiell 1998). Having speech codes that

contain overbroad regulations can punish protected speech and “chill” the free exchange of ideas.

Along with the failure of the fighting words doctrine, the group libel doctrine used by speech code advocates is also seen as an invalid legal justification. In response to the group libel model, critics argue that the Supreme Court has overturned the *Beauharnais* precedent in *Milkovich v. Lorain Journal*, 497 U.S. 1 (1990). The Court held that statements defaming groups while conveying opinions on public concern must be protected even if the statements hurt public reputations. The group libel doctrine was further weakened by the Supreme Court adopting a very narrow view of what forms a false statement, even saying in *Gertz v. Robert Welch, Inc.*, 418 U.S. 323 (1974) that “under the First Amendment, there is no such thing as a false idea” (417). Detractors of the group libel doctrine argue speech codes are not justified because most are not tailored narrowly enough to conform to the Court’s standard (Shiell 1998).

Another constitutional argument is that speech codes do not pass constitutional scrutiny because they are not content neutral (Williams 1995; Bobbitt 2017; Lukianoff 2017). As will be explained in the next section on the tensions between PC and the freedom of speech, the Supreme Court has consistently made clear that it is unconstitutional to restrict speech based on its content except for extraordinary reasons. This requirement is intended to protect the free exchange of ideas because limiting speech based on content can lead to the suppression of speech to which groups in power disagree. Speech codes thus are considered unconstitutional as they are entirely defined by the content of the speech they are aiming to suppress, such as racist and sexist speech.

The second argument used by critics to oppose speech regulations focuses on the consequences of speech codes. In a general sense, the consequences argument centers on the belief that hate speech codes, even if constitutionally approved, should not be adopted because of seriously negative consequences (Shiell 1998). According to critics, the most significant effect of enforcing campus speech codes is the “chilling” of protected speech. Even if the regulation of speech does not limit constitutionally restricted speech, students and faculty may choose to limit their speech or not speak at all out of fear of being accused of hate speech (Choi and Murphy 1992; Friedman and Narveson 1995; Deresiewicz 2017). This effect is in part a consequence of how subjective speech codes can be. Similar to PC, which depends on marginalized groups to determine the harmfulness of a term, speech codes are also subjective since they often rely on the feelings of minorities to determine which language to punish. Based on the division between protagonists and antagonists over the legitimacy of speech codes, reaching a consensus on which speech is harmful or not is extremely difficult.

Advocates of speech codes may respond that it does not matter if “hate speech” is chilled because the greater good is to protect marginalized victims, rather than the “marketplace of ideas.” However, critics often counter that the primary mission of universities is to promote knowledge and seek truth, which requires free thought and expression (Shiell 1998). Allan Bloom, in *The Closing of the American Mind* (1987), wrote: “Freedom of the mind requires not only, or not even especially, the absence of legal constraints but the presence of alternative thoughts” (249). Bloom’s belief is largely shared by critics of speech codes, based on the assumption that speech should not be constrained on

college and university campuses. According to critics, the better way to fight hate speech is not banning it, but countering it with more speech. The university is supposed to be a marketplace of ideas where everyone can find their own truths through constant debates and discussions, even if those discussions are uncomfortable (Shiell 1998; Bobbitt 2017). Consequently, speech codes are considered by critics as eroding the academic freedom of universities by causing people to self-censor their thoughts rather than express them in an area of openness.

Another argument provided by critics of speech codes is that they can promote feelings of inferiority and victimization. When speech codes are created, they are giving administrators the power to control what can or cannot be said (Friedman and Narveson 1995). Minorities are, in essence, depending on campus authority, who tend to be white, for protection against harmful speech. While advocates argue that speech codes will greatly benefit minorities due to deterring hate speech, the truth is that the regulations can cause minorities to regard themselves as victims rather than individuals who are capable of fighting their own battles. Nat Hentoff, an American historian, has said: “Antiracism rules teach black people to depend on whites for protection, while talking back clears the air, emphasizes self-reliance, and strengthens one’s self-image as an active agent in charge of one’s own destiny” (Shiell 1995, 69). Many minorities agree with Hentoff and see speech codes as condescending because they assume minorities are helpless victims. Instead of relying primarily on speech codes to “protect” minorities, universities should promote self-reliance and empowerment through free expression. In the eyes of critics, speech codes have severely

negative consequences, such as “chilling” protected speech and encouraging attitudes of victimization, that outweigh limiting speech for the “greater good.”

There continues to be no definite answer about the need for speech codes on college and university campuses. Both proponents and detractors have valid arguments. PC advocates support campus speech regulations because they believe that they deter hate speech, protect disenfranchised students from physical and psychological harm and marginalization, and are consistent with the essential aims of a university. Contrastingly, critics of PC reject the use of speech codes because they infringe on an individual’s freedom of speech and assume that disenfranchised groups are helpless victims who cannot protect themselves. Such regulations promote a victim mentality in minorities and underrepresented communities, and disrupt the university’s marketplace of ideas. A further contention based on specific speech codes is whether or not they are overbroad or vague for being overbroad or vague. Despite the ongoing controversy, speech codes are currently present in over half of the university and college campuses (FIRE 2014).

### *Multiculturalism*

Imagine this scenario: A white male professor is teaching a required social science course that consists of readings relating to the great thinkers and developments in European and American history and literature. A majority of the students are people of color who have historical and cultural roots outside of Europe, making white students the minority. One day the students begin to ask: “Why do we have to take this course about old white men? Why is there no mention of the significant contributions women and people of color have made in the modern world? The professor can approach the situation in various ways. He can ignore

the students and continue the lesson. He can encourage them to stick to the curriculum because the information taught is necessary to graduate and can assist them in “rising” above their prejudices. The professor can also suggest that the students go to the black, women’s, or other ethnic studies programs to have their questions answered. Another option is that the faculty, including the professor, can learn enough about the interconnection between cultures and achievements between non-European nationalities and Europe to answer their students’ questions (Bowser 1995, xv).

This scenario illustrates the dilemma many professors face in colleges and universities today due to the rise in multiculturalism. The study of multiculturalism is essentially how colleges and universities have chosen to address educators and students about issues related to diversity. It involves the use of inclusive strategies to bring attention to women and members of marginalized communities, including the creation of ethnic studies departments, the addition of non-European literature to the literary canon, and the hiring of more diverse faculty on campus (Bowser 1995; Williams 1995; Cuyjet et al. 2016).

Multiculturalism often is described as a movement occurring in higher education intended to promote an appreciation for others different from ourselves and to make faculty and students more aware of the need to be more inclusive in their relationships, practices, and education (Hughes 2010). James A. Bank, a pioneer of multicultural education, divides multiculturalism into five dimensions: content integration, the knowledge construction process, prejudice reduction, an equity pedagogy, and an empowering school culture and social structure (Gorski 1999).

Content integration focuses on how teachers infuse content and examples from a variety of cultures into a single subject area. The knowledge construction process describes teaching methods to help students and faculty understand why the cultural identities and biases of researchers have to be acknowledged when determining the validity and accuracy of knowledge. Prejudice reduction analyzes the characteristics of a student's racial attitudes and promotes strategies intended to help children develop more positive and democratic values. Equity pedagogy exists when teachers modify their techniques and methods to facilitate the academic achievement of students from diverse racial, socioeconomic, cultural, and language groups. One example is when a variety of teaching styles that are consistent with different cultural groups are used. Lastly, empowering school culture and social structure involves restructuring the culture and organization of a school to make students of diverse groups experience educational equality (Banks 1993).

Overall, a key factor of multiculturalism in colleges and universities has been the inclusivity of diverse groups. Because multiculturalism aims to make colleges and universities more inclusive towards women and minorities, it is often considered to be an integral part of the PC movement.

### **History of Multiculturalism**

The roots of multiculturalism in American higher education largely lie in the civil rights movements of historically oppressed groups in the 1960s. During that period, women, African Americans, and other people of color challenged discriminatory practices in public institutions. The LGBTQ+, elderly, and people with disabilities would not be part of the movement until the 1970s. One of the institutions specifically targeted were educational

institutions, which were seen as highly oppressive and hostile to women and minorities (Gorski 1999). As a result, there was a push for education reform that would make schools, colleges, and universities more inclusive.

In response to this movement, colleges and universities first began adding ethnic studies departments and programs as part of multicultural education. San Francisco State College is arguably one of the first campuses to enforce that change with the development of the College of Ethnic Studies, established in 1969 after a coalition of ethnic groups went on multiple strikes on campus in 1968 (Bates and Miraji 2019). The College of Ethnic Studies primarily focused on race and ethnicity as programs like Black studies, Native American studies, and Latin American studies were created. The actions of San Francisco State would spread to other California campuses like Berkeley and eventually to the rest of the country as the schools enacted their own ethnic studies and departments.

While ethnic studies programs made colleges and universities more inclusive than before, by the 1980s, multicultural theorists recognized that ethnic studies were not enough to make education more multicultural. They refused to allow schools to address the concerns of women and minorities by simply adding token classes or special programs on famous women or famous people of color outside the standard curriculum (Gorski 1999; Hughes 2010). With the help of James A. Banks, colleges and universities put more focus into examining all aspects of a school, including school policies, instructional material, and overall school experience, to develop a truly multicultural environment (Banks 1993). This change can primarily be seen in the addition of diverse, non-European literature in schools during the 1980s. Historically in American colleges and universities, students were made to

read seminal works that were foundational in European and American history. The literary canon often included writers like Shakespeare, Ulysses, Dickinson, Walt Whitman, and others who made many criticize the Western literary canon as being full of "old, white men" (Bloom 1994).

However, in the 1980s, schools began including literature written by women and people of color, such as works by Frederick Douglas and Junot Díaz. Stanford University was one of the first schools to implement that change. In 1988, it dropped its required course "Western Civilization" and replaced it with "Culture, Ideas, and Values" that included at least one non-Western culture and works by women, minorities, and people of color (Bernstein 1988; Hughes 2010). Despite the nationwide controversy over Stanford's decision, more universities like the University of Minnesota began integrating additional literary works by women and non-European people of color into their curriculums. It would be because of those changes that people, particularly conservatives, associate multiculturalism with PC.

Since the 1980s to today, colleges and universities have made additional efforts to enhance multiculturalism, which include: the creation of diversity offices, such as the commonly known Office of Multicultural Affairs, multicultural clubs and associations, a wider selection of study abroad locations outside of Europe, as well as hiring more diverse faculty, and increasing degrees like Gender Equality Studies that promote inclusivity (Afridi, n.d.). All of these actions fully represent how the perspective of American education has changed into viewing classrooms as a community of diversity and not just including European or American culture.

Although colleges and universities today continue to push their campuses to be more inclusive to women and minorities, there is constant discussion about how PC and multiculturalism should be integrated into the content of classes. The PC debate largely centers on the Western canon. As previously mentioned, the Western canon is the body of literature, art, music, and philosophy that traditionally has been valued in the West and are regarded as classics based upon western classical literature and history (Bloom 1994). Most universities create their curriculum based on a defined body of academic works, so advocates and critics of PC constantly are conflicted about what should be included in the canon or even if a canon does or should exist. Any discussion about this often leads to conflicts about the curriculum because if the canon is Eurocentric, then other parts of the curriculum is highly likely to be Eurocentric too. In this thesis, advocates of PC and multiculturalism are labeled as critics of the Western canon. Likewise, opponents of PC and multiculturalism are labeled as supporters of the Western canon.

### **Arguments Against the Western Canon**

Critics of the Western canon generally create their arguments based on five assumptions. First, despite the massive scale and diversity of higher education, there is a fairly standard Eurocentric curriculum. Second, an exclusively Eurocentric education does not provide the skills, experiences, and knowledge an educated person will need to be successful in today's global society. Third, a multicultural curriculum in higher education will better prepare educated Americans and international citizens. Fourth, the American university is both a historical and cultural institution shaped by societal demands, meaning that rapid demographic changes will require the curriculum in higher education to be less

Eurocentric and more multicultural. Fifth, faculty need to rethink their teaching methods and update how students are taught as the university moves away from a Eurocentric pedagogy (Bowser et al. 1995).

From those assumptions, critics argue that the Eurocentric Western canon and curriculum should not be used because it is overly dominated by old white males and outdated (Friedman and Narveson 1995; Landy 2019). The current Western canon is most notably criticized because of its lack of ideas involving anything other than a predominantly Western culture. For instance, despite a school's racial, cultural, or socioeconomic demographics, students are expected to be familiar with literary works such as *Romeo and Juliet*, *The Great Gatsby*, *The Odyssey*, and *The Adventures of Huckleberry Finn*. These stories have different plots and meanings, but a common trait between each writing is that they were written by white, heterosexual, males. Most of the canonical works are also regarded as timeless literary classics (Bloom 1994). While the Western canon is filled with literary merit and teaches students about cultural references, critics argue that the homogeneity of the authors and characters fails to accommodate a more heterogeneous audience (Black 2018).

In 2015, 62 percent of the U.S. population were non-Hispanic whites. Eighteen percent were Hispanic, 12 percent were Black, six percent were Asian, and 2 percent were other (Pew Research Center 2015). However, by 2055, non-Hispanic whites are projected to make up less than half of the country's population due to the increase of non-white immigrants and the decline in fertility among Caucasians. The entire white proportion of the world's population is also expected to lower for the same reasons. Every country in NATO

currently has a declining population (Bowser et al. 1995). Although the decline of the white population is evident, minority populations are still expected to increase as they are having more children, meaning that the world will eventually be run by various non-white groups.

For this reason, the American university, as an institution shaped by societal demands, should expand its literary canon to include works by women and people of color. If the world is changing, colleges and universities should naturally change as well. However, rather than make that shift, the curriculum in universities all too often continues to be biased towards works written by white men who only highlight European and American cultures (Friedman and Narveson 1995). It fails to consider the multitude of races, genders, and classes that exist in the world. The Western canon is, therefore, both outdated and exclusive of a multitude of cultures and worldviews.

Along with the Western Canon not adapting to the increasingly multicultural society, critics argue that the texts teach ideas that are not acceptable in modern society. The canonical works often make troubling assumptions about race, gender norms, and sexual preference. Some examples include Rousseau's concept of the "noble savage" and Aristotle's belief that some humans are naturally born to be slaves (Landy 2019). It is because those beliefs were so readily accepted in the past that many find Western cultural history to be oppressive towards marginalized groups. The Western canon thus should be changed so students can learn from a broader frame of reference. Adherents of the Eurocentric canon may counter that Western culture and the "great books" are not monolithic because canonical authors have different views on subjects (Bowser 1995). The fact still remains though that, according to critics, the current Western canon is dominated by old European and American

works, meaning that students are not being exposed to non-European worldviews (Black 2018).

Additionally, the Eurocentric canon creates the idea that the European and American worldviews are the only ones that are relevant to a student's education, which is incorrect. Adherents of the Western canon often rebut that Europe and Europeans are at the center of modern world history. The centrality of European culture in education is thus justified since what was achieved by Europeans can improve everyone's lives (Maranto et al. 2009). However, while that can partially be proven, the Eurocentric canon cannot be said to show a totally impartial truth. For instance, most of the European achievements in the canon ignore the contributions of non-European groups like Africans, Asians, and Native Americans. Also, those achievements often came at the heavy price of colonialism. No matter how much Europe and Europeans impacted society, making the educational curriculum, especially the literary canon, Eurocentrism downplays the impact various cultures have had on the world. Critics argue that the Western canon is thus a form of intellectual colonialism because the lack of representation of non-European cultures makes them feel inferior (Bowser et al. 1995).

All in all, the Western canon should not be utilized in higher education as the sole cultural frame of reference because it promotes a narrow point of view. A significant reason students go to colleges and universities is to become educated enough to be successful in the world. Every country, including the U.S., has been affected by relationships with other countries and cultures, especially in today's globalized world. Using this information, a Eurocentric canon in actuality stands in the way of America's social progress and its

multinational, multicultural, and multiracial backgrounds (Bowser et al. 1995; Friedman and Narveson 2015). Based on these facts, a Eurocentric canon in actuality stands in the way of America's social progress and its inclusion of multinational, multiracial, and multicultural populations.

The Western canon being outdated and overly Eurocentric also prevents students from being successful. For students to succeed in this growing multicultural society, they will have to be knowledgeable and accepting of diverse cultures. Learning solely from a Eurocentric canon will not benefit students because it does not properly recognize marginalized groups and makes non-European cultures appear to be inferior rather than equal to Europe (Friedman and Narveson 2015).

Finally, the Eurocentric Western canon prevents minority students from learning about their personal cultural identity, which can have a negative effect on their educational experience. Taylor explains in "The Politics of Recognition" (1993) that there is a demand for recognition because a lack of it can damage an individual's identity. Black, Latinx, Asian, female, or any other student from a marginalized group should be educated on diverse cultures outside of Europe because the university ultimately is supposed to be a community of diversity, not one of assimilation to European culture (Bowser et al. 1995).

Critics of the Western canon argue that the Western canon should either be abolished or expanded to include more multicultural works. When describing the PC movement, particularly multiculturalism, writers Greg Lukianoff and Jonathan Haidt (2015) state:

That movement sought to restrict speech (specifically hate speech aimed at marginalized groups), but it also challenged the literary,

philosophical, and historical canon, seeking to widen it by including more-diverse perspectives (para. 4).

Adding more multicultural works to the Western canon will cause some European works to be excluded from being taught, but the action will allow students to gain a wider view of diverse peoples and cultures. By showing students to more works by women, non-Europeans, and people of color, they will be exposed to a more inclusive education that will help them succeed in a multicultural society (Friedman and Narveson 1995). Minority students will also have the chance to learn more about their culture, which will positively affect their identity and educational experience.

### **Arguments for the Western Canon**

Supporters defending the Western canon base their arguments for a Eurocentric focus in the educational curriculum on four assumptions. First, Europe and Europeans are at the center of modern world history. Second, the European traditions of the government, sciences, and commerce are superior. Third, the centrality of European experience is justified because what was achieved can improve lives worldwide. Lastly, the achievements and roles of other cultures and people are worth studying, but they are not as important as European achievements (Bowser et al. 1995).

Fundamentally, supporters of the Eurocentric Western canon reject multicultural expansion in academia in part because there is not enough time to explore every culture. European thought has had the most impact on the world, and the canon already contains the most essential works. The Western canon exists in education because it is impossible to read everything. Especially in colleges and universities, there is a limited time to explore

everything in the field of literature (Bloom 1994; Friedman and Narveson 1995). Decisions, therefore, have to be made about which literary pieces should be included in the curriculum. For that reason, critics of PC declare that the canon should remain Eurocentric based on the belief that Europe's influence on the U.S. and the rest of the world are superior to the impact of other cultural groups.

Europe and Europeans have massively influenced American culture with the likes of capitalism, art, colonialism, and democracy, so it is logical for the canon to be Eurocentric to preserve America's history and traditions (Maranto et al. 2009). Adherents of multiculturalism ask that the canon be changed or expanded to allow more works from women or people of color to be included because it is currently unfairly biased towards one perspective. While that argument is true, supporters of the canon believe that detractors really do not want inclusion, rather, they want to supplant the canon. Stephen Behrendt, an English teacher postulates:

The sad irony of changing canons is that doing so merely replaces one set of narrow and privileged judgments with another equally narrow, but different, set of standards by which to decide who gets in and who doesn't (Bates 2013, para. 19).

Even if the Western canon is substituted for a multicultural one, the fact remains that it will still be biased towards a particular point of view. The group in charge determines what is included or excluded in the canon, so there will always be a sense of superiority in the works selected (Landy 2019). Therefore, supporters of PC cannot use "unjust bias" as a reason

against the Western canon since if they get their way, the canon will shift from having a Eurocentric standard to having another standard that is just as biased.

Some may argue that a more liberal standard is better for education, but, for others, a new multicultural canon compromises the current American higher educational curriculum because it denigrates the impact Europeans had on Western culture. Supporters of the Western canon accept that other cultures can be studied as well due to their achievements, but rather than make the canon entirely multicultural, they would prefer that the primary focus remain on European works.

Current works in the canon are timeless classics that teach moral values. Some of the most popular books in the Western canon are *Hamlet* by William Shakespeare, *The Odyssey* by Homer, *Great Expectations* by Charles Dickens, *The Republic* by Plato, and *Pride and Prejudice* by Jane Austen (Goodreads, n.d.). PC advocates, however, generally look at the Western literary canon as perpetuating the social, racial, and prejudicial themes of the authors, countries, and their times (Maranto 2009). It explains why the Western canon with its Eurocentric focus is often criticized as being oppressive towards marginalized groups and women. Critics of PC contrastingly believe that canonical works should not be read with a sociopolitical lens, but instead as an expression of genuine insight.

Many canonical works are considered to contain moral values and information that can be used by anybody no matter where they are from or what race they are (Bloom 1994; Bloom 1997). Texts and authors included in the Western canon often have been highly influential on subsequent literature and popular culture. For example, Toni Morrison's *Song of Solomon* includes multiple allusions to *The Odyssey*. The Declaration of Independence

was influenced by John Locke's idea of life, liberty, and the pursuit of property. *The Lion King* was influenced by Shakespeare's *Hamlet* (Landy 2019). Even if the literature was written in the days of a patriarchal, racist European culture, it is evident that they all have impacted modern society throughout today's world in some way. To understand the present, one has to understand the past, and for many parts of today's society, that includes white, European canonical works.

The literature included in the Western canon possesses a great beauty and aesthetic standard that cannot be replaced based solely on ethnocentric and gender consideration (Bloom 1994). When reading pieces like Shakespeare's sonnets and lines from *Pride and Prejudice*, even if they are contrary to commonly accepted beliefs of gender and race today, people should continue to read them. The works may be considered flawed by today's liberal standards, but they have a sense of beauty that ignores time and nationality. Simply put, some pieces in the Western canon are too beautiful and contain timeless truths that transcend culture to be replaced by literature that focuses only on race, gender, or culture.

Defenders of the Western Eurocentric canon argue that it should remain in colleges and universities because there is not enough time to explore every culture. European thought has had the most impact on the world, and the canon already is made of essential works. Harold Bloom, a prominent literary critic, wrote: "Without the Canon, we cease to think" (1994, 41). The Western canon contains timeless works that teach students how to think, moral values, aesthetic standards that impact cultures worldwide, and lessons needed to become successful. Although supporters of multiculturalism want the canon to become more multicultural by including more literary pieces by women and people of color, people

defending the current Western canon argue that Europe has impacted American and the world more than any other culture. Rather than trying to learn about every culture, which is impossible to do in a limited time, students would benefit more from learning primarily about the most significant contributors in America's history and culture based on the Western European tradition.

Today, multiculturalism is a driving force in the PC movement in colleges and universities. The concept was not associated with PC until the 1980s, but multiculturalism is what made the idea of "diversity" become a goal of PC that needs to be accomplished (Hughes 2010). Yet despite the world moving towards becoming multicultural, there continues to be a debate centered on the place of multiculturalism in higher education, particularly with regards to the Western canon. Advocates believe that the literary canon and curriculum should become more multicultural since they currently are outdated, fail to consider the achievements of women and non-European cultures, and prevent students from getting adequate education to be successful in a multicultural society. In contrast, critics defend the current Western canon because its works are sublime, contain essential moral values, have an aesthetic standard that cannot be replicated by other non-European works, and have impacted people and cultures worldwide. The debate is far from over.

### *Trigger Warnings*

Unlike speech codes that affect verbal speech and multiculturalism that impacts the curriculum, trigger warnings affect how professors teach in their classrooms. Connected to Post Traumatic Stress Disorder (PTSD), trigger warnings are best described as "alerts that professors are expected to issue if something in a course might cause a strong emotional

response” (Lukianoff and Haidt 2015, para. 2). They are often used when professors give warnings about class material that might be provocative or disturbing. For example, before reading *The Great Gatsby* in class, the teacher may warn the students about the portrayals of misogyny and domestic violence within the text (Sykes 2016). After hearing the trigger warning, students who feel uncomfortable with those topics will have the option to dodge the potentially distressing passages or skip the entire reading altogether. Trigger warnings thus are created to protect traumatized students from content that may upset them or “trigger” flashbacks to past trauma.

### **A History of Trigger Warnings**

The idea of “triggers” can be traced back to the treatment of Vietnam War veterans in the 1980s. Psychologists began identifying triggers that caused veterans to exhibit symptoms of PTSD, such as unwanted memories of traumatic events or heightened anxiety (Miller 2015). The term “trigger warning” later originated in the 1990s on feminist Internet message boards to alert readers that the posted material may contain content that could trigger PTSD or produce severe feelings for victims of sexual abuse (Duignan, n.d.; Robbins 2016). Soon trigger warnings were applied to other areas of discussion to protect victims of a wide range of trauma and disorders, including eating disorders, domestic violence, and suicidal tendencies.

Trigger warnings did not appear in colleges and universities until the early 2010s. During that period, the term would expanded to include protection for victims of injustice, oppression, and discrimination. Once trigger warnings became more common in educational institutions, there was a rise in requests for trigger warnings for content that might provoke a

strong adverse reaction and, in some cases, for material to be entirely removed from the course syllabi (Duignan, n.d.). As a result, professors addressed the issue of trigger warnings in various ways within the classroom, such as in their course syllabi, during the dissection of a narrative's passage, or during presentations relating to problematic topics (Sykes 2016).

One of the earliest schools to officially encourage the use of trigger warnings was Oberlin College (Brown 2016). In 2013, the school published a draft of an extensive trigger warning policy in its Sexual Offense Resource Guide. The plan endorsed the use of trigger warnings on course materials that referred to sexual violence and advised faculty to “be aware of racism, classism, sexism, heterosexism, cissexism, ableism, and other issues of privilege and oppression” in their course material (Jarvie 2014, para. 3). An example used in the policy was Chinua Achebe's *Things Fall Apart*, as it was a novel that could trigger readers who have experienced racism or violence. Oberlin also asked faculty to remove triggering material that did not directly relate to the learning goals and consider making a policy that would make triggering material optional to students (Jarvie 2014; Sykes 2016). Although the controversial recommendations were eventually removed after several faculty members protested, Oberlin College serves as a model for trigger warnings because the institution was the first and still unabashedly supports their use today.

Another noteworthy moment in the historical evolution of trigger warnings in higher education occurred at Rutgers University. A sophomore student wrote an op-ed in 2014 arguing that professors should issue alerts when teaching Virginia Woolf's *Mrs. Dalloway* for its suicidal tendencies and F. Scott Fitzgerald's *The Great Gatsby* for its violence (Brown 2016). In that same year, the student government from the University of California, Santa

Barbara passed a resolution urging to include trigger warnings in their course syllabi to allow students to protect themselves from PTSD triggers (Diamba 2014). The idea was presented after a student, a victim of sexual abuse, was shown a film depicting rape without warning from the professor (Medina 2014). Increasingly, a growing number of students have requested trigger warnings on class content to protect traumatized students. Their actions have caused many teachers to oblige by giving alerts in handouts, before presentations, and even in emails before class. This shift can be seen from institutions like Scripps College, where lecturers provide warnings before presenting the core curriculum class, the “Histories of the Present: Violence” (Jarvie 2014).

Although students and parents have fought to include trigger warnings in course material throughout the past decade, many colleges and universities have stood against them for reasons of censorship and freedom of speech. A recent case in 2015 occurred when four Columbia University undergraduates requested that instructors issue trigger warnings to students of any “triggering and offensive” material in their courses (Duignan, n.d.). Their letter referred to a case where a female student, who was a victim of sexual assault, experienced extreme distress and felt unsafe after reading depictions of rape in Ovid’s *Metamorphoses*, which was an assigned text (Miller 2015). In response, the university refused to require teachers to include trigger warnings for their class material out of fear of censorship. They decided that the warnings would not be productive or intellectually honest (Nunez 2015). Columbia University was not the first school to reject trigger warning policies, but their decision contributed to the current debate over trigger warnings in higher education.

According to a survey by the National Coalition Against Censorship (NCAC) of members of the Modern Language Association and the College Art Association, over half of college professors reported using trigger warnings at least once despite few universities having official policies (NCAC 2015; Brown 2016). Many have issued them out of their own volition in response to their students' concerns (Kamentz 2016). Nonetheless, while the use of trigger warnings has increased in recent years along with the other effects of PC, criticisms against trigger warnings have also multiplied. The conflict nearly mirrors other aspects of the PC debate. Supporters of PC generally defend the use of trigger warnings in higher education. To the contrary, while critics of PC agree that trigger warnings can be used on a case-by-case basis, they are often against the implementation of trigger warning policies throughout a college or university.

### **Arguments for Trigger Warnings**

One reason why advocates of PC like the use of trigger warnings is because it gives students suffering from trauma agency over encountering their trauma in class. For victims of PTSD, virtually anything can be a trigger, including sights, smells, sounds, or conversations (Shibley 2016). Triggers can also be unpredictable and are not always clearly linked to their trauma (Brown 2016). To that extent, if professors issue warnings to students about material that will be presented in class before assignments or discussions, then students with trauma can decide whether they wish to engage with the potentially distressing content or not. They have the ability to choose what option to take instead of being forced to see content that could trigger their symptoms of PTSD.

Giving trauma survivors agency over their interaction with potentially traumatic content is vital because it affects their educational experience. For instance, if students are unexpectedly exposed to disturbing content, like a documentary that included scenes of domestic violence, then there is a possibility that the ones who have personal connections with that material could face symptoms of PTSD. They could have a non-voluntary psychological or physical response that may lead to a state that prevents them from processing the information (Haslam 2017). For this reason, trigger warnings give trauma survivors a “heads up” to prepare for the material in advance (NSAC 2015; Brown 2016). The warning helps trauma survivors because they are able to engage with the provocative material rather than face the consequences of unexpectedly encountering it. After all, if students are already aware of the content that is potentially triggering, instead of being “blindsided” by the material, which can distract them from learning in class, they can put more focus on analyzing the meaning and other components of the content (NSAC 2015).

In addition to giving students agency over encountering their trauma, trigger warnings can help students with PTSD or traumatic histories in their mental recovery. Critics of PC often argue that trigger warnings allow students to dodge conversations and topics that make them feel “uncomfortable” but are necessary for success in life (Lukianoff and Haidt 2015; Robbins 2016; Shibley 2016). However, advocates of trigger warnings believe that students do not use trigger warnings to escape from distressing content, but rather to prepare themselves from it (NCAC 2015). Maddy Myers, a writer who identifies herself as someone with PTSD, states that the warnings do not prevent her from engaging with the content. Instead, they help her “prepare for what she might endure” (Knox 2017, 15).

It is established that individuals with PTSD cannot always prepare for what may trigger their memories of past trauma (Robbins 2016). Considering that most mental health professionals recognize that exposure to trauma is necessary for recovery, giving trigger warnings to students can positively impact the recovery process because they have controlled exposure to triggering content instead of facing it unexpectedly (Shibley 2016; Robbins 2016). Students with PTSD or traumatic histories are able to manage their mental health and better prepare to engage with their trauma. Although trigger warnings can lead to the avoidance of content, it may be better to allow students with PTSD to choose when they are ready to engage with their triggering content instead of simply being exposed to it without warning (Rathje 2018).

Advocates also believe that trigger warnings are used to create a more inclusive learning environment in the classroom. When trauma survivors request trigger-warning accommodations, they are informing the educator about the importance of their experience and what they need to engage in class fully (Byron 2017; Knox 2017). By professors issuing warnings about potentially distressing content, it can then be understood as a sign of acknowledgment and sensitivity to the marginalized students with PTSD or traumatized histories (NCAC 2015). It gives the affected students a sense of inclusion as their feelings and experiences are recognized in the classroom. Additionally, the use of trigger warnings can teach educators new ways to teach students who may have a traumatic past, which may diversify their teaching methods and make the class more accepting of students with various backgrounds (Knox 2017).

Critics of trigger warnings may claim that the warnings simply coddle students when they should be challenged in colleges and universities. Yet proponents counter that it is improper to dismiss those marginalized students as coddled because that minimizes the reality of their trauma and can perpetuate ideas that they have not healed properly, which can create feelings of shame and affect their educational experience and success (Byron 2017). Rather than being insulted by being labeled as “coddled,” professors should make their students feel welcome in class so they will be more open to sharing their thoughts in class and contributing to the college “marketplace of ideas.” For this reason, trigger warnings help students with PTSD or traumatized histories feel involved in class and can uplift the classroom experience.

### **Arguments Against Trigger Warnings**

The primary complaints against trigger warning policies are that they foster a culture of victimhood, prevent students with trauma from recovering, and hinder academic freedom within colleges and universities. At first glance, trigger warnings seem reasonable because they allow students with PTSD to decide if they are ready to face triggering content and help them mentally prepare for their classes. However, critics argue that the list of topics that warrant trigger warnings is so broad that it “infantilizes” students. Trigger warnings were originally intended to affect traumatized individuals who had experienced sexual or physical violence (Haslam 2017). Over time, the discussions and content that required triggers broadened to include a range of topics such as child abuse, self-harm, war, drug use, death, racism, pregnancy, and homosexuality (Robbins 2016; Sykes 2016). The number of triggers can be as high, if not more, as the number of students in a class. There have even been

proposals to include trigger warnings for insects and spiders. Although professors may use issue warnings to acknowledge the requests from their students, the continuous expansion of trigger warnings may hurt students more than help them.

Critics argue that the broad range of trigger warnings cause students, with or without PTSD, to become hypersensitive to harm and encourage a sense of fragility (Lukianoff and Haidt 2015; Haslam 2017). Jenny Jarvie, a writer for *The New Reporter* says: “By framing more public spaces, from the Internet to the college classroom, as full of infinite yet ill-defined hazards, trigger warnings encourage us to think of ourselves as weaker and more fragile than we really are” (Jarvie 2014, para. 12). When students are given warnings about a wide range of topics, they are made aware of the potential harm the content or discussion can bring to people. As a result, they can begin to question whether they can handle the information or if it will cause emotional distress (Robbins 2016). This way of thinking can eventually condition the students to believe that they are too fragile to handle specific ideas when, in reality, they are capable of overcoming the psychological obstacle. Such warnings ultimately encourage students to avoid the content that is distressing instead of embracing it as part of the learning process (Khazan 2019).

For example, an instructor warns her class that the upcoming discussion will be about death. Despite a student not having any traumatic memory or history relating to death, they wonder if the topic will make them uncomfortable. After anticipating that the subject might cause emotional distress, the student uses the instructor’s trigger warning policy to escape the discussion about death and gets permission to leave class or skip the material. This situation showcases how the use of trigger warnings can lead to a presumption of extraordinary

fragility in colleges and universities (Lukianoff and Haidt 2015). The more trigger warnings are used toward the entire class, the more likely students will believe that they have a low tolerance for discomfoting and painful subjects, which can prevent them from maturing psychologically and receiving a sound education.

One aim of universities is to challenge students' beliefs so they can discover their personal truths (Shiell 1998; Bobbitt 2017). This requires students to face discomfoting content so they can be exposed to new ideas, question beliefs they have taken for granted, and expand their horizons to become more informed citizens (AAUP 2014). When trigger warnings are implemented on a broad range of topics, the intellectual process is interrupted because they subsequently cause students to focus more on anticipating possible discomfort than engaging the material (NCAC 2015). Therefore, trigger warning policies can create a culture of victimhood because students are reduced to being vulnerable victims rather than being full participants in the intellectual process of higher education (AAUP 2014; Lukianoff and Haidt 2015).

Advocates often argue that trigger warnings are justified because students with serious issues, like PTSD, need to be dealt with respectfully and seriously (Medina 2014; NCAC 2015; Khazan 2019). However, critics counter that trigger warning policies should not be implemented because they are being extended to most students who have not had significant traumatic experiences (NCAC 2015). In 2015, the U.S. Department of Veteran Affairs stated that around seven to eight percent of Americans would have PTSD in their lifetime, meaning that college students diagnosed with PTSD most likely make up only a small percentage of the student population on college campuses (Shibley 2016). Trigger

warnings were initially intended for a narrowly defined group of students with PTSD or other serious issues to help them cope with their traumas on campus (Duignan, n.d.; Sykes 2016).

Yet as trigger warnings have expanded from content concerning just physical or sexual abuse to a broad range of subjects, they have been applied to a larger population of students who traditionally were not considered to have traumatic histories. Particularly with blanket trigger warning policies similar to Oberlin College's recommendations, the individual experiences of traumatized students are now being combined with the anticipation of negative reactions by members of the entire class (AAUP 2014). This shift negatively affects colleges and universities because non-traumatized students may misuse the trigger warnings meant for students with PTSD to avoid content that merely makes them uncomfortable or distressed (Robbins 2016).

While such avoidance causes students to miss insightful class material and exposure to critical ideas, it also makes the incorrect assumption that normal emotions like disgust, uncomfortableness, and disapproval are the same as the traumatic symptoms of PTSD (Haslam 2017). The majority of people are not and would not be diagnosed with PTSD, so creating that blanket connection between college students and victims of PTSD can lead to the belief that college students should be "protected" from content rather than exposed to it (AAUP 2014; Shibley 2016). Therefore, people are against trigger warnings because of how they can be misused and further push the assumption that all students are fragile and need protection.

Along with affecting students' educational experiences and having them all be characterized as victims needing protection, policies requiring trigger warnings can prevent

students from recovery because they encourage them not to face their discomforts (Khazan 2019). Exposure therapy is often found as the most effective intervention for those with trauma (Robbins 2016). The idea is that by repeatedly exposing oneself to the triggering content, there is a high chance that PTSD symptoms will decline over time (McNally 2017). Most mental health professionals therefore encourage patients with disorders like PTSD to expose themselves to triggers as essential for their recovery (Shibley 2016). Avoidance is seen as a symptom rather than a treatment of PTSD trauma.

Although trigger warnings were created to help students with PTSD or traumatized histories, they may be counterproductive to those students because they encourage the avoidance of difficult discussions. If students encounter material that shows or mentions their trauma, then the primary way for them to recover is by facing their triggers, not avoiding them (Robbins 2016). This same philosophy applies to students with intense emotional issues who see content that causes them extreme distress. As a result, trigger warnings may have the opposite effect on students since over-extended use on classroom material can lead to avoidance rather than engagement (Lukianoff and Haidt 2015).

In addition to those arguments, trigger warnings can hinder academic freedom by chilling speech. In 1940, the American Association of University Professors (AAUP) wrote the *Statement of Principles on Academic Freedom and Tenure* that is still the fundamental document on academic freedom for faculty in higher education. The statement declares that: “Teachers are entitled to freedom in the classroom in discussing their subject, but they should be careful not to introduce into their teaching controversial matters which have no relation to their subject” (Euben 2002, para. 6). This declaration gives professors the freedom to decide

what will be taught and discussed in their classrooms. However, as the number of topics that warrant trigger warnings continues to increase, faculty may feel more pressure to dodge or avoid discussing controversial subjects for fear of complaints or offending students (AAUP 2014). With required trigger warning policies, this pressure can hinder their academic freedom because rather than teaching their desired material, educators are worried about if the subject matter will get them punished.

Marc Bletcher, a politics professor at Oberlin College, commented on the proposed 2013 trigger warning policy:

If I were a junior faculty member looking at this while putting my syllabus together, I'd be terrified. Any student who felt triggered by something that happened in class could file a complaint with the various procedures and judicial boards, and create a very tortuous process for anyone (Medina 2014, para. 20).

Bletcher's comment highlights the fears many educators have when discussing trigger warnings. Since anything can be a trigger, it is impossible to know when a warning is necessary (Duignan, n.d.; NCAC 2015; Haslam 2017). This uncertainty can lead to students gaining control over the class since the absence of trigger warnings becomes a justification to file a complaint against a teacher. The presence of trigger warnings also can give students power as it teaches them that skipping class or missing assignments is a valid response for uncomfortable material (Shibley 2016). As a result, an educator's academic freedom is compromised because of their students' demands to avoid punishment or having their students not participate in their classes due to the material.

Although tenured faculty are affected by the implementation of trigger warnings, non-tenured faculty are particularly at risk (AAUP 2014). For example, an adjunct professor at Scripps College once was reported over a routine pedagogical conflict over something he had said in class. The student in question claimed to have felt “triggered” and turned his life into a bureaucratic “dumpster fire” as a result of having to face the school’s administration’s wrath. Despite being cleared, the professor became careful to avoid saying or teaching anything that might lead to trouble (Lukianoff and Haidt 2015). This situation explains how trigger warnings can make educators overly cautious or avoidant to certain subjects. When school administrators view students as individuals needing protection, complaints about topics being too offensive or discomforting are often given much weight (NCAC 2015). Professors thus can be severely punished for not correctly accommodating their students. Since the professor in the example did not have tenure, any complication caused by students reporting him puts him at a higher risk of losing him his job. For this reason, educators can become afraid and avoid teaching “sensitive” subjects or material (AAUP 2014; Shibley 2016). Their academic freedom is thus substituted for the comfortability of their students.

On top of giving power to the students, trigger warnings also compromise academic freedom by becoming a form of censorship in the classroom. Robbins (2016) explains, “Not surprisingly, as the breadth of topics that are labeled unacceptable or potentially injurious and offensive grows, so does the concern about the way these new speech codes not only undermine academic freedom but also...foster a culture of victimhood” (2). Robbins’ statement refers to trigger warnings as speech codes because of how they censor certain subjects in classrooms. As previously mentioned, the list of topics that warrant trigger

warnings continues to expand (Duignan, n.d.; Haslam 2017). Trigger warnings are commonly associated with PTSD and trauma, so this expansion eventually causes the broad range of “sensitive” topics to be regarded as offensive or unacceptable in class. As a result, trigger warnings can indirectly promote self-censorship within educators as educators try to avoid mentioning those subjects while teaching (NCAC 2015).

Advocates may believe that censorship through trigger warnings is necessary because it protects students with PTSD or traumatic histories from surprisingly encountering triggers (NCAC 2015; Sykes 2016; Brown 2016; Haslam 2017). However, critics explain that preventing PTSD symptoms is not enough justification for censoring speech because it creates a slippery slope. Virtually anything can be considered as a trigger because identifying them is subjective by nature (Shibley 2016). This can lead to a forced ideological consensus that will cause educators to stop teaching views with which some students disagree.

For instance, liberal students can file a complaint that they are offended by conservative opinions. To respect their students’ vulnerability, their professor then tries to avoid mentioning conservative ideas. While that scenario may appear to be far-fetched, the truth remains that trigger warnings can lead to censoring specific viewpoints due to the identification of triggers being subjective (NCAC 2015). Considering that colleges and universities are meant to expose students to new ideas, this form of censorship can negatively affect a student’s educational experience as well as obstruct an instructor’s freedom to teach what they want.

Overall, critics argue against trigger warning policies because they create a culture of victimhood, prevent students with trauma from recovering, and hinder academic freedom.

Students go to college to be challenged and open to the “marketplace of ideas” rather than be protected. Additionally, a professor’s job is to expand and challenge their students, which sometimes requires the use of discomfiting subjects to create informed citizens. Since there are students with PTSD or traumatic histories who need to be acknowledged, critics of trigger warnings find accommodation not only necessary but essential for a small number of students. However, forcing trigger warning policies on every student is problematic (Medina 2014).

This section analyzed the effects of PC on language in colleges and universities: speech codes, multiculturalism, and trigger warnings. It also looked into the arguments made by advocates and critics regarding each of these effects. While supporters and critics have varying views about the impact of speech codes, multiculturalism and trigger warnings in higher education, it is evident that each effect deals with whether equality or liberty should be prioritized more in colleges and universities.

Speech codes are supported to ensure that minority and other disenfranchised students are educated in an equal and safe educational environment, but are criticized for infringing on free speech and limiting the marketplace of ideas. Those who advocate for multicultural education emphasize the need for universities to include perspectives from women and people of color that promote the many contributions of Non-Western civilizations to our society. In contrast, others are against a revised curriculum that detracts from a Eurocentric worldview that was once the status quo and is still considered as a necessity to successfully educate students. Universities have promoted trigger warning policies to protect students with PTSD and traumatic histories to receive a safe and equal education, but some detractors

reject them because they believe they censor speech on campuses while delaying the maturation of students for what is sometimes a harsh world. Despite their division, supporters and opponents of PC, however, are connected by their conflict over whether equality of education or freedom of expression is more important.

## **Section Four:**

### **The Conflict Between PC and the Freedom of Speech**

After exploring the intellectual foundation and history, as well as its impact on colleges and universities, this section will discuss the general conflict between PC and the freedom of speech. A primary aim of PC is changing the norms and behavior in language (Hughes 2010). To prevent the use of terms deemed offensive or that exclude marginalized groups, PC uses methods like speech codes, making curriculums more inclusive, and trigger warnings as ways to control speech. In particular, PC largely focuses on restraining and punishing the use of hate speech—offensive speech principally directed towards minorities and marginalized groups (Wolfson 1997). Since hate speech is often at the center of the conflict between PC and the freedom of speech, this section will examine how the government and the PC movement deal with hate speech.

When people argue that PC wrongly infringes on one's freedom of speech, the speech they are referring to is that which they claim to be constitutionally protected. The First Amendment of the U.S. Constitution states:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances (U.S. Const. amend. I).

The First Amendment ensures that citizens cannot be censored or punished for what they say (Choi and Murphy 1992; Shiell 1998). As decided by the U.S. Supreme Court, however,

there are certain kinds of speech that are not protected and can be restricted by the government based on content. These limited categories of unprotected speech currently consists of obscenity, defamation, fraud, incitement, fighting words, true threats, speech integral to criminal conduct, and child pornography (Killion 2019). Due to its harmful and abusive nature, many proponents of PC believe hate speech should not have constitutional protection (Bobbitt 2017).

Unfortunately, there is no precise, legal definition of hate speech under U.S. law. Hate speech is generally regarded as speech or expressions that express prejudice against a particular group typically on the basis of race, gender, sexuality, or religion (Wolfson 1997). This type of speech includes epithets, slurs, and other kinds of expression that incites violence or hatred against a group. It ultimately undermines the public good by promoting intimidation, violence, or discrimination (Waldron 2012). For that reason, there have been numerous attempts to stifle hate speech in the U.S. One of the earliest instances of state legislation against hate speech was Maryland's Act of Toleration in 1649. The act restrained persons "reproaching any other by the name or denomination of...or by any other name of term, in a reproachful manner relating to the subject of religion" (Hughes 2010, 173). It was used to promote freedom of religion in the Maryland Colony by restricting hate speech based on one's faith. While Maryland's Act of Toleration banned religious hate speech, which would later be reinforced by the Religious Clauses of the First Amendment, the U.S. Supreme Court would, nevertheless, develop a more expansive view of free speech. It would permit some forms of offensive speech that are not directed towards a specific individual or do not lead to immediate violence.

*U.S. Supreme Court Hate Speech Cases*

There are six significant Supreme Court cases that have defined, limited, and in some instances promoted speech that many would consider to be offensive and others would deem to be hate speech

**a) *Terminiello v. Chicago*, 337 U.S. 1 (1949)**

The first case is *Terminiello v. Chicago*, 337 U.S. 1 (1949). The city of Chicago had a law that forbade any “breach of the peace,” which consisted of any misbehavior that violates the public peace, stirs the public to anger, invites dispute, brings about a condition of unrest, or arouses alarm (*Terminiello v. Chicago* 1949, 1). Father Terminiello was found guilty of violating the ordinance after delivering a speech in an auditorium to the Christian Veterans of America that included inflammatory comments criticizing various political and religious groups, such as Communists and Zionist Jews. Terminiello appealed his charges on the basis that the law violated his freedom of speech under the First Amendment.

The Supreme Court sided with Terminiello, holding that Chicago’s ordinance unconstitutionally infringed upon an individual’s freedom of speech. Its rationale was that a function of free speech is to invite dispute (*Terminiello v. Chicago* 1949). Provocative speech benefits society as it displays a true diversity of ideas. Justice Douglas wrote: “It may indeed best serve its high purpose when it induces a condition of unrest, creates dissatisfaction with conditions as they are, or even stirs people to anger” (*Terminiello v. Chicago* 1949, 4). ). In essence, the vitality of society depends on free discussion. Speech should only be restricted when there is a clear and present danger. As a result, this case found some forms of offensive

speech to be constitutionally protected to ensure the free discussion of ideas, even when those ideas created disputes.

**b) *Beauharnais v. Illinois*, 343 U.S. 250 (1952)**

An important ruling against hate speech is from *Beauharnais v. Illinois*, 343 U.S. 250 (1952). This case involved an Illinois statute that made it a crime to exhibit any publication that portrayed libelous information against a class of citizens of any race, color, or creed that could cause public unrest (*Beauharnais v. Illinois* 1952). Joseph Beauharnais was convicted for violating that law after he distributed anti-black pamphlets throughout the streets of Chicago. He appealed his conviction because Illinois's statute violated his freedom of speech and was too vague. The Supreme Court ruled for the state of Illinois. The First Amendment did not protect libelous speech since it historically is "liable to cause violence and disorder" and has a "tendency to cause breach of the peace" (*Beauharnais v. Illinois* 1952, 254). Therefore, Illinois could not be at fault for punishing libel directed at defined groups. This case would ultimately become the basis for the group libel doctrine used to advocate for hate speech codes directed at speech considered to be libelous and, thus, not constitutionally protected.

**c) *Brandenburg v. Ohio*, 395 U.S. 444 (1969)**

This case dealt with Ohio's Criminal Syndicalism statute that bans advocating "the duty necessity or propriety of crime, sabotage, violence, or unlawful methods of terrorism as a means of accomplishing industrial or political reform" (*Brandenburg v. Ohio* 1969, 444). Clarence Brandenburg, a Ku Klux Klan (KKK) leader, gave a speech at a KKK rally that included hateful comments against Jews, black people, and anybody who supported those

groups. After being convicted of violating the statute, he appealed to the U.S. Supreme Court. The Court ruled for Brandenburg, finding that Ohio's statute was overbroad and failed to draw the distinction between abstract advocacy of the use of violence and actions likely to incite violence (*Brandenburg v. Ohio* 1969). Unless Brandenburg's speech brought a clear and present danger to society, the Court found that his words are still protected under the First Amendment and cannot be made forbidden by the law.

**d) *R.A.V. v. City of St. Paul*, 505 U.S. 377 (1992)**

Another seminal hate speech case is *R.A.V. v. City of St. Paul*, 505 U.S. 377 (1992). It dealt with St. Paul's Bias-Motivated Crime Ordinance, which prohibits the display of a symbol that "arouses anger, alarm or resentment in others on the basis of race, color, creed, religion or gender" (*R.A.V. v. City of St. Paul* 1992, 377). Several teenagers were charged with violating the ordinance after assembling and burning a cross inside the yard of a black family's house. After the convictions were appealed, the Supreme Court ruled in favor of the petitioners because the law prohibited speech solely based on its content. For instance, St. Paul's ordinance banned offensive acts on subjects of race, religion, creed, or gender, but allowed abusive displays not directed to those topics (*R.A.V. v. City of St. Paul* 1992). The First Amendment prevents government from restricting speech based on the disapproval of ideas expressed; any content-based law is presumptively invalid (Wolfson 1997). Therefore, some forms of speech are protected via the First Amendment despite protestations by those who find the speech offensive and sometimes even threatening, because the government cannot punish speech simply because they disfavor the opinion expressed.

**e) *Virginia v. Black*, 538 US 343 (2003)**

Another case related to cross-burning is and hate speech is *Virginia v. Black*, 538 US 343 (2003). Virginia had an ordinance that made it a felony for any person to burn a cross on someone else's property or any public space. Three people were arrested separately for violating this ban. In a majority ruling, the Court sided with Virginia. It held that while being consistent with the First Amendment, a state may ban cross burning with the intent to intimidate (*Virginia v. Black* 2003). Although cross burning can be expressive, Virginia was allowed to ban it because cross burning is considered as a "true threat," which is a type of speech that can be regulated by the government. True threats are statements "where a speaker directs a threat to a person or group of persons with the intent of placing the victim in fear of bodily harm or death" (*Virginia v. Black* 2003, 344). Because the Court found that cross burning has historically been a symbol of hate and often served as a message for intimidation, the expression was considered as a true threat and did not have constitutionally protected. This case demonstrated that hate speech considered to be a true threat was not protected under the First Amendment umbrella of Free Speech.

**f) *Snyder v. Phelps*, 562 US 443 (2011)**

One of the more recent cases relating to hate speech is *Snyder v. Phelps*, 562 US 443 (2011). Members of the Westboro Baptist Church (referred to as Westboro) picketed anti-American and anti-homosexual messages at the funeral of Marine Lance Corporal Matthew Snyder. Albert Snyder, the father of the deceased, did not see what was written on the signs until he saw them on a news broadcast covering the event. Due to Snyder becoming severely emotionally distressed, he sued the members of Westboro for defamation, invasion of privacy, and intentional infliction of emotional distress (*Snyder v. Phelps* 2011).

The Supreme Court ruled for Westboro and found that the First Amendment protected the respondents from tort liability. Westboro's protest was a matter of public concern and was at a public place, which gives their speech constitutional protection. Also, Chief Justice Roberts wrote: "As a Nation we have chosen a different course—to protect even hurtful speech on public issues to ensure that we do not stifle public debate" (*Snyder v. Phelps* 2011, 15). Even though Westboro's actions could be considered as hate speech and did cause Snyder extreme emotional distress, their words should still be protected to prevent the suppression of disagreeable opinions and allow open debate.

These cases show that language that is offensive, creates disputes, or is merely unpopular, is protected by the First Amendment. Additionally, the Federal, state and local governments cannot outlaw speech they disfavor solely on the basis of its content. A few exceptions of hate speech that are not protected are those that are either libelous or present a true threat.

#### *Conflict Between PC and Freedom of Speech*

Based on how the U.S. Supreme Court has ruled on hate speech, it is evident why there is a conflict between PC and one's freedom of speech. PC seeks to restrict hate speech while the First Amendment believes it should be protected. Judge Cohn wrote in the opinion of *Doe v. Michigan*:

It is an unfortunate fact of our constitutional system that the ideals of freedom and equality are often in conflict. The difficult and sometimes painful task of our political and legal institutions is to mediate the appropriate balance between the competing values (Shiell 1998, 1).

Judge Cohn's statement perfectly summarizes the PC debate. It is the conflict between freedom of speech and equality (Cummings 2001). If one prioritizes the freedom of speech, any speech labeled as offensive by colleges and universities is viewed with suspicion. Advocates of free speech revere the "marketplace of ideas" that they believe requires the protection of diversity of opinions to work properly (Wolfson 1997; Maranto et al. 2009; Bobbitt 2017). Frequently, PC legislation that attempts to punish hateful or offensive speech is unconstitutional because it is overbroad. Such legislation can also create a slippery slope because of the opinions of minority groups, which can sometimes be viewed as subjective (Lukianoff and Haidt 2015; Shibley 2016). According to critics, this subjectivity can eventually cause schools to restrict speech that is merely disagreeable or unfavorable.

On the contrary, advocates of PC believe that one's freedom of speech can be compromised for equality (Banks 1993; Cummings 2001). As previously discussed, minority groups have historically experienced unequal educational opportunities due to hateful or offensive speech on college and university campuses. The presence of hate speech and fighting words on campuses has all too often silenced minorities through implied and direct threats (Shiell 1998). When this occurs, the thoughts of minorities are muted and devalued, which also distorts the marketplace of ideas. PC thus is intended to level the educational experience and protect the ideals of freedom and equality by preventing the use of offensive or exclusionary language. Speech codes are used to punish offensive speech while the movement toward multiculturalism makes higher education more inclusive towards women and people of color. Trigger warnings help students with traumatic histories deal with discomforting content. While the effects of PC may restrict a student or faculty's freedom of

speech, PC supporters believe that the hindrance is justified as minorities and marginalized groups have an equal opportunity in colleges and universities.

Overall, the conflict between PC and one's freedom of speech is centered on the competing values of equality and freedom. Until a balance is reached between the two ideals, the PC debate will cease to end.

### **Conclusion:**

#### **PC—Finding the Middle Ground**

In March 2019, President Trump signed an executive order protecting freedom of speech on college campuses, surrounded by student activists who felt that conservative views were being suppressed at universities (Svrluga 2019). The document directed federal agencies that issue federal grants to ensure colleges and universities comply with the law and their own policies to promote “free inquiry” on their campuses (Haberman and Shear 2019).

President Trump wrote:

In particular, my Administration seeks to promote free and open debate on college and university campuses...We must encourage institutions to appropriately account for this bedrock principle in their administration of student life and to avoid creating environments that stifle competing perspectives, thereby potentially impeding research and undermining learning (Svrluga 2019, para. 32).

Although President Trump's administration did not clarify exactly how the order will be enforced, it is a clear sign of how the PC debate is still present in today's society and nowhere close to being resolved. There continues to be a question of whether equality should

come at the expense of free speech or vice versa (Shiell 1998). The debate has all too often divided our country. In spite of the varied opinions and perspectives about PC, this thesis has attempted to provide a balanced perspective on this highly politicized debate.

The essential elements of PC in colleges and universities have been examined in this thesis. Section One highlighted how postmodernism, deconstruction, and the construct that language is power form the intellectual foundation of PC. Section Two described the transformation of PC in recent history and how the PC debate in colleges and universities began. Section Three examined three critical effects of PC — speech codes, multiculturalism, and trigger warnings — and the conflicts that surrounded them. Finally, Section Four unfolded how the battle between PC and freedom of speech concentrates on the constant struggle between the ideals of liberty and equality.

After discussing these components, it is clear that PC is a double-edged sword for colleges and universities. The PC movement is justifiable because it promotes equality on campuses, but it can also be problematic as it hinders freedom of speech and expression that are essential for students to receive an informed education. Despite the conflict, however, a balance of PC and free speech must be reached so current society, especially in colleges and universities, can move forward. Those involved in the PC debate need to reach some sort of compromise that guarantees campuses are more inclusive while at the same time promote the “marketplace of ideas.” For this reason, instead of either one ideal being prioritized over the other, this thesis proposes that there should be an appreciation for both equality and freedom of speech on campuses.

To achieve a balance between equality and freedom of speech in colleges and universities, this thesis suggests changes that should take place on campuses. The first recommendation is that speech codes should not be enforced on college campuses unless they are narrowly tailored. While hate speech is intended to harm others, its subjective nature, which is often in the eye of the beholder, makes it difficult to create a content-neutral speech code that does not infringe on constitutionally protected speech. Colleges and universities need to promote knowledge through the clash of ideas in a safe environment. Instead of relying solely on rigid speech codes, students and faculty should accept some personal responsibility and use their right to individual freedom of speech to counter hate speech. Campuses must, however, never permit speech intended to purposefully intimidate, to denigrate, or provoke violence towards any student or groups of students. Along with fostering knowledge, colleges and universities are responsible for promoting the order and safety necessary to encourage student self-reflection, education, and an appreciation of others who are different.

The second recommendation is that colleges and universities continue to make their educational curriculum more multicultural. While it is true that every culture cannot be studied and many books in the current Eurocentric canon are timeless, campuses still need to become more supportive of women, people of color, and disenfranchised populations by recognizing the importance of studying their histories and cultures. The world's population is becoming more diverse as white populations will no longer be the majority, so students should be exposed to a multicultural education to prepare them for their future. Use of seminal works from other cultures in combination with those of the Western canon can

provide a means for students to see the value of cross-cultural studies and others who are different from themselves.

The last recommendation is that trigger warnings only be applied on a case-by-case basis. There should not be blanket trigger warning policies because they prevent students from being exposed to discomforting material that will, in the end, benefit their education. Blanket trigger warnings can also potentially lead to censorship as faculty becomes fearful of teaching their desired content. Trigger warnings should, therefore, only be done on a case-by-case basis when students with PTSD or traumatic histories want assistance from their professor. With these recommendations, colleges and universities may get closer to finding the balance between PC and one's freedom of speech. Perhaps, students upon entry into a college or university education should be exposed to a seminar or other on-going training on the nature of political correctness so they can become aware of its dynamics and establish personal behavioral norms to reduce conflict.

Overall, this thesis is intended to shine another light on this highly politicized debate and reaffirm the importance of finding a middle ground between PC and free speech in our society. Even though PC continues to be revered by some and vilified by others for its impact on higher education, everyone must look beyond the politicized arguments spread throughout the media and seek their own truths through their own research and experiences. By taking these steps, this country can come closer to finding peace with political correctness.

## References

- AAUP (American Association of University Professors). 2014. "On Trigger Warnings." Accessed March 25, 2020. <https://www.aaup.org/report/trigger-warnings>.
- Afridi, Mehnaz M. n.d. "Multicultural And Diversity Guide For Students." Accessed March 11, 2020. <https://www.accreditedschoolsonline.org/resources/student-diversity-multicultural/>.
- Aichinger, Alex. 2017. "Campus Speech Codes." *First Amendment Encyclopedia*, June 2017. <https://www.mtsu.edu/first-amendment/article/991/campus-speech-codes>.
- Banks, James A. 1993. "Multicultural Education: Historical Development, Dimensions, and Practice." *Review of Research in Education* 19 (1): 3-49.
- Bates, Jordan. 2013. "Literary Canons Exclude Works No Matter How Selective Canon Makers Are." *The Daily Nebraskan*, April 25, 2013. [http://www.dailynebraskan.com/culture/literary-canons-exclude-works-no-matter-how-selective-canon-makers/article\\_da83def2-ad43-11e2-b07a-0019bb30f31a.html](http://www.dailynebraskan.com/culture/literary-canons-exclude-works-no-matter-how-selective-canon-makers/article_da83def2-ad43-11e2-b07a-0019bb30f31a.html).
- Bates, Karen Grisby, and Shereen Marisol Meraji. 2019. "The Student Strike That Changed Higher Ed Forever." *NPR*, March 21, 2019. <https://www.npr.org/sections/codeswitch/2019/03/21/704930088/the-student-strike-that-changed-higher-ed-forever>.
- Beauharnais v. Illinois 343 U.S. 250 (1952).
- Bernstein, Richard. 1988. "In Dispute on Bias, Stanford Is Likely To Alter Western Culture Program," *New York Times*, January 19, 1988.
- Birchall, Frederick T. 1934. "Personal Liberty Vanishes in Reich." *New York Times*, December 31, 1934.
- Black, David. 1986. "The Callings." *New York Times*, May 11, 1986.
- Black, Devon. 2018. "Reconstructing the Canon." *Harvard Political Review*, April 25, 2018. <https://harvardpolitics.com/culture/thecanon/>.
- Black, Jeremy and Donald M. MacRaild. 2000. *Studying History*. 2nd ed. New York: Palgrave Macmillan.
- Bloom, Allen. 1987. *The Closing of the American Mind*. New York: Simon and Schuster, Inc.
- Bloom, Harold. 1994. *The Western Canon: The Books and Schools of the Ages*. San Diego:

- Harcourt Brace and Company.
- Bobbitt, Randy. 2017. *Free Speech on America's K-12 and College Campuses: Legal Cases from Barnette to Blaine*. Lanham, MD: Lexington Books.
- Bowser, Benjamin P. 1995. "Introduction." In *Toward the Multicultural University*, edited by Benjamin P. Bowser, Terry Jones, and Gale Auletta Young, xv-xxvi. Westport: Praeger.
- Brandenburg v. Ohio, 395 U.S. 444 (1969).
- Brown, Sarah. 2016. "A Brief Guide to the Battle Over Trigger Warnings." *The Chronicle of Higher Education*, August 26, 2016.  
<https://www.chronicle.com/article/A-Brief-Guide-to-the-Battle/237600>.
- Bump, Philip. 2015. "How 'Politically Correct' Moved From Commies to Culture and Back Into Politics," *Washington Post*, December 17, 2015.  
<https://www.washingtonpost.com/news/the-fix/wp/2015/12/17/the-interesting-evolution-of-political-correctness/>.
- Butler, Christopher. 2002. *Postmodernism: A Very Short Introduction*. New York: Oxford University Press.
- Byron, Katie. 2017. "From Infantilizing to World Making: Safe Spaces and Trigger Warnings on Campus." *Family Relations* 66 (1): 116–25. doi:10.1111/fare.12233.
- Caesar, Chris. 2017. "Trump Ran Against Political Correctness. Now His Team is Begging For Politeness," *Washington Post*, May 16, 2017.  
<https://www.washingtonpost.com/posteverything/wp/2017/05/16/trump-ran-against-political-correctness-now-his-team-is-begging-for-politeness/>.
- Chaplinsky v. New Hampshire 315 U.S. 568 (1942).
- Chisholm v. Georgia, 2 U.S. 2 Dall. 419 419 (1793).
- Choi, Jung Min, and John W. Murphy. 1992. *The Politics and Philosophy of Political Correctness*. Westport: Praeger.
- Clapp, James E., Elizabeth G. Thornburg, Marc Galanter, and Fred R. Shapiro. 2011. *Lawtalk: The Unknown Stories Behind Familiar Legal Expressions*. Connecticut: Yale University Press.
- Cohen v. California, 403 U.S. 15 (1971).

- Collingwood, R.G. 2014. *The Idea of History*. New York: Oxford University Press.
- Cresswell, John W. 2009. *Research Design: Qualitative, Quantitative, and Mixed Methods Approaches*. 3rd ed. California: SAGE Publications.
- Cummings, Michael S. 2001. *Beyond Political Correctness : Social Transformation in the United States*. Boulder: L. Rienner Publishers.
- Cuyjet, Michael J., Chris Linder, Mary F. Howard-Hamilton, and Diane L. Cooper. 2016. *Multiculturalism on Campus : Theory, Models, and Practices for Understanding Diversity and Creating Inclusion*. Sterling: Stylus Publishing.
- Deresiewicz, William. 2017. "On Political Correctness: Power, Scholar, and the New Campus Religion." *The American Scholar*, March 6, 2017.  
<https://theamericanscholar.org/on-political-correctness/#>.
- Diamba, Jessy. 2014. "A.S. Resolution Policy Aims to Protect Students From PTSD Triggers." *Daily Nexus*, March 7, 2014.  
<http://dailynexus.com/2014-03-07/a-s-resolution-policy-aims-to-protect-students-from-ptsd-triggers/>.
- Doe v. University of Michigan, 721 F. Supp. 852 (E.D. Mich. 1989).
- Duignan, Brian. n.d. "Trigger Warnings on Campus." Accessed March 22, 2020.  
<https://www.britannica.com/story/libertarianism>.
- Eaton v. City of Tulsa, 415 U.S. 697 (1974).
- Euben, Donna R. 2002. "Academic Freedom of Individual Professors and Higher Education Institutions: The Current Legal Landscape." *American Association of University Professors*: 1-34.
- Feldstein, Richard. 1997. *Political Correctness: A Response from the Cultural Left*. Minneapolis: University of Minnesota.
- FIRE (Foundation for Individual Rights in Education). 2014. "2014 Speech Codes Infographic." Accessed March 3, 2020.  
<https://www.thefire.org/resources/spotlight/reports/spotlight-on-speech-codes-2014-infographic/>.
- Foucault, Michel. 1976. *The History of Sexuality*. Paris: Éditions Gallimard.
- Foucault, Michel. 1977. "Nietzsche, Genealogy, History." In *Language, Counter-memory, Practice: Selected Essays and Interviews*, edited by Donald F. Boucard, 139-165. Ithaca: Cornell University Press.

- Friedman, Marilyn, and Jan Narveson. 1995. *Political Correctness : For and Against*. Lanham, Md.: Rowman & Littlefield.
- Gertz v. Robert Welch, Inc., 418 U.S. 323 (1974).
- Gooding v. Wilson, 405 U.S. 518 (1972).
- Goodreads, n.d. "Popular Western Canon Books." Accessed March 17, 2020. <https://www.goodreads.com/shelf/show/western-canon>.
- Gorski, Paul C. 1999. "Brief History of Multicultural Education." *EdChange*, November 1999. [http://www.edchange.org/multicultural/papers/edchange\\_history.html](http://www.edchange.org/multicultural/papers/edchange_history.html).
- Greenawalt, Kent. 1995. *Fighting Words: Individuals, Communities, and Liberties of Speech*. NJ: Princeton University Press.
- Haberman, Maggie, and Michael D. Shear. 2019. "Trump Signs Executive Order Protecting Free Speech on College Campuses." *New York Times*, March 21, 2019. <https://www.nytimes.com/2019/03/21/us/politics/trump-free-speech-executive-order.html>.
- Haslam, Nick. 2017. "A Short History on Trigger Warnings." *Psychopaedia*, May 19, 2017. <https://psychopaedia.org/society/republished/whats-the-difference-between-traumatic-fear-and-moral-anger-trigger-warnings-wont-tell-you/>.
- Hassan, Irab. 1987. "Pluralism in Postmodern Perspective." In *Exploring Postmodernism*, edited by Matei Calinescu and Douwe Fokkema, 17-39. Amsterdam: John Benjamins Publishing Company.
- Hess v. Indiana, 414 U.S. 105 (1973).
- Hudson, Paul. 2000. *History by Numbers: An Introduction to Quantitative Approaches*. New York: Oxford University Press.
- Hughes Geoffrey. 2010. *Political Correctness : A History of Semantics and Culture*. Chichester: Wiley-Blackwell.
- Jarvie, Jenny. 2014. "Trigger Happy." *The New Republic*, March 3, 2014. <https://newrepublic.com/article/116842/trigger-warnings-have-spread-blogs-college-classes-thats-bad>.
- Johnson, Ian. 2018. "Who Killed More: Hitler, Stalin, or Mao?" *The New York Review of Books*, February 5, 2018. <https://www.nybooks.com/daily/2018/02/05/who-killed-more-hitler-stalin-or-mao/>.

- Jones, Lawrence F., and Edward C. Olson. 1996. *Political Science Research: A Handbook of Scope and Method*. Michigan: HarperCollins College Publishers.
- Kamentz, Anya. 2016. "Half Of Professors In NPR Ed Survey Have Used 'Trigger Warnings'." *NPR*, September 27, 2016.  
<https://www.npr.org/sections/ed/2016/09/07/492979242/half-of-professors-in-npr-ed-survey-have-used-trigger-warnings>.
- Khazan, Olga. 2019. "The Real Problem With Trigger Warnings." *The Atlantic*, March 28, 2019.  
<https://www.theatlantic.com/health/archive/2019/03/do-trigger-warnings-work/585871/>.
- Killion, Victoria L. 2019. "The First Amendment: Categories of Speech." *Congressional Research Service*, January 16, 2019. <https://fas.org/sgp/crs/misc/IF11072.pdf>.
- Landy, Joshua. 2019. "Should We Abandon the Canon?" *Philosophy Talk*, August 12, 2019.  
<https://www.philosophytalk.org/blog/should-we-abandon-canon>.
- Leitch, Vincent B. 1983. *Deconstructive Criticism: An Advanced Introduction*. New York: Columbia University Press.
- Leopold, David, and Marc Stears. 2008. *Political Theory: Methods and Approaches*. New York: Oxford University Press.
- Lukianoff, Greg. 2008. "Campus Speech Codes: Absurd, Tenacious, and Everywhere." *National Association of Scholars*, May 23, 2008.  
[https://www.nas.org/blogs/article/campus\\_speech\\_codes\\_absurd\\_tenacious\\_and\\_everywhere](https://www.nas.org/blogs/article/campus_speech_codes_absurd_tenacious_and_everywhere).
- Lukianoff, Greg, and Jonathan Haidt. 2015. "The Coddling of the American Mind." *The Atlantic*, September 2015.  
<https://www.theatlantic.com/magazine/archive/2015/09/the-coddling-of-the-american-mind/399356/>.
- Manning, Kathleen. 1997. "Multiculturalism and 'The Politics of Recognition' by Charles Taylor." *NASPA Journal* 34(2): 157-163.
- McNally, Richard J. 2017. "Hazards Ahead. The Problem With Trigger Warnings, According To the Research." *Pacific Standard*, June 14, 2017.  
<https://psmag.com/education/hazards-ahead-problem-trigger-warnings-according-research-81946>.

- Medina, Jennifer. 2014. "Warning: The Literary Canon Could Make Students Squirm." *New York Times*, May 17, 2014.  
<https://www.nytimes.com/2014/05/18/us/warning-the-literary-canon-could-make-students-squirm.html>.
- Miller, Michael E., 2015. "Columbia Students Claim Greek Mythology Needs a Trigger Warning." *Washington Post*, May 14, 2015.  
<https://www.washingtonpost.com/news/morning-mix/wp/2015/05/14/columbia-students-claim-greek-mythology-needs-a-trigger-warning/>.
- Montanaro, Domenico. 2018. "Warning to Democrats: Most Americans Against U.S. Getting More Politically Correct," *NPR*, December 19, 2018.  
<https://www.npr.org/2018/12/19/677346260/warning-to-democrats-most-americans-against-u-s-getting-more-politically-correct>.
- NCAC (National Coalition Against Censorship). 2015. "NCAC Report: What's All This About Trigger Warnings?" *NCAC*, August 2015.  
<https://ncac.org/resource/ncac-report-whats-all-this-about-trigger-warnings>.
- Nicholson, Linda. 1996. "To Be or Not to Be: Charles Taylor and the Politics of Recognition." *Constellations: An International Journal of Critical & Democratic Theory* 3(1): 1-16. <http://doi:10.1111/j.1467-8675.1996.tb00040.x>.
- Nielson, James. 1995. "The Great PC Scare: Tyrannies of the Left, Rhetoric of the Right." In *PC Wars: Politics and Theory in the Academy*. Edited by Jeffrey Williams, 60-90. New York, NY: Routledge.
- Nunez, Vivian. 2015. "Columbia University Removes Trigger Warnings, Citing Censorship Concerns." *Generation Progress*, July 14, 2015.  
<https://genprogress.org/columbia-university-removes-trigger-warnings-citing-censorship-concerns/>,
- Ohmann, Richard. 1995. "On 'PC' and Related Matters." In *PC Wars: Politics and Theory in the Academy*. Edited by Jeffrey Williams, 11-22. New York, NY: Routledge.
- Orbach, Barak. 2012. "On hubris, civility, and incivility." *Arizona Law Review* 54 (2): 443-456.
- Parker, Richard. n.d. "Gooding v. Wilson (1972)." *The First Amendment Encyclopedia*, Accessed March 12, 2020.  
<https://www.mtsu.edu/first-amendment/article/296/gooding-v-wilson>
- Pollis, Carol A. 1987. "The Apparatus of Sexuality: Reflections on Foucault's Contributions to the Study of Sex in History." *The Journal of Sex Research* 23 (3): 401-414.  
<https://doi.org/10.1080/00224498709551379>.

- Rathje, Steve. 2018. "Do Trigger Warnings Help or Harm?" *Psychology Today*, August 1, 2018.  
<https://www.psychologytoday.com/us/blog/words-matter/201808/do-trigger-warnings-help-or-harm>.
- R.A.V. v. City of St. Paul, 505 U.S. 377 (1992).
- Reuters. 1991. "Excerpts From President's Speech to University of Michigan Graduates." *New York Times*, May 5, 1991.  
<https://www.nytimes.com/1991/05/05/us/excerpts-from-president-s-speech-to-university-of-michigan-graduates.html>.
- Robbins, Susan P. 2016. "From the Editor--Sticks and Stones: Trigger warnings, Microaggressions, and Political Correctness." *Journal of Social Work Education* 52 (1): 1-5. doi: 10.1080/10437797.2016.1116850.
- Robert Corry et al. v. Leland Stanford Junior University, No. 740309 (Cal. Super. Ct. Feb. 27, 1995),
- Rosenau, P.M. 1992. *Post-modernism and the social sciences: Insights, inroads, and intrusions*. Princeton, NY: Princeton University Press.
- Shibley, Robert. 2016. "Vindictive Protectiveness on Campus." *Society* 53 (4): 375-382.  
<http://doi:10.1007/s12115-016-0031-7>.
- Shiell, Timothy C. 1998. *Campus Hate Speech on Trial*. Lawrence: University Press of Kansas.
- Snyder v. Phelps, 562 US 443 (2011).
- Spencer, Martin E. 1994. "Multiculturalism, 'Political Correctness,' and the Politics of Identity." *Sociological Forum* 9 (4): 547-567.
- Sunstein, Cass R. 1993. *Democracy and the Problem of Free Speech*. New York: The Free Press.
- Svrluga, Susan. 2019. "Trump Signs Executive Order on Free Speech On College Campuses." *Washington Post*, March 21, 2019.  
<https://www.washingtonpost.com/education/2019/03/21/trump-expected-sign-executive-order-free-speech/>.
- Sykes, Charles J. 2016. *Fail U: The False Promise of Higher Education*. New York: St. Martin's Press.

- Taylor, Charles. 1992. "The Politics of Recognition." In *Multiculturalism and "The Politics of Recognition": An Essay by Charles Taylor*, edited by Amy Gutmann, 25-73. Princeton: Princeton University Press.
- Taylor, Dianna. 2011. *Michel Foucault: Key Concepts*. Durham: Acumen.
- Terminiello v. Chicago, 337 U.S. 1 (1949).
- UWM Post v. Board of Regents of the University of Wisconsin, 774 F. Supp. 1163 (E.D. Wis. 1991).
- Virginia v. Black, 538 US 343 (2003).
- Waldron, Jeremy. 2012. *The Harm in Hate Speech*. Cumberland: Harvard University Press.
- Weigel, Moira. 2016. "Political Correctness: How the Right Invented a Phantom Enemy," *The Guardian*, November 30, 2016.  
<https://www.theguardian.com/us-news/2016/nov/30/political-correctness-how-the-right-invented-phantom-enemy-donald-trump>.
- Williams, Jeffrey, ed. 1995. *PC Wars: Politics and Theory in the Academy*. New York, NY: Routledge.