

## Two Approaches to Civic Education

Kristen Hamilton

Thesis Advisor: Professor Patrick Neal

One primary purpose of public education in a liberal democracy is to foster the skills and virtues necessary for democratic citizenship. However, there is deep disagreement about what those skills and virtues are. On one hand, some argue that public education should teach the importance of critical thinking and autonomous decision making, as these characteristics are vital to a functioning democracy. This will be referred to as “autonomy approach”. On the other hand, some argue that civic education requires that the state be as accommodating as possible to diverse belief systems, and that this diversity is compromised by an emphasis upon individual autonomy. This will be referred to as the “tolerance approach”. The tension between these two approaches can be seen most clearly with regard to issues of religious freedom in public education. This thesis will compare and evaluate the two approaches to democratic education by examining not only the terms of and rationale behind each approach, but also how each addresses a set of vexing cases involving religious freedom and public education.

Most agree that public education in America should, in part, serve the interest of maintaining our political tradition by teaching democratic ideals and civic virtue. The controversial nature of civic education exists because of different perceptions of what the fundamental democratic values are and how they are interpreted. Political theorist Amy Gutmann explains the significance of political controversies over education: “We do not collectively know good educational policy when we see it; we cannot make good educational policy by avoiding political controversy; nor can we make principled educational policy without exposing our principles and investigating their implications” (*Democratic Education* 6). As the composition of society changes, we must go back and reevaluate the efficiency of our system of civic education and its congruence with democratic standards. This turns out to mean that we have to reflect on those standards themselves, which this thesis will attempt to do. We will not be able to effectively educate democratic citizens if we do not have a clear idea of what a democratic citizen is. This thesis is designed to flesh out the current arguments about civic education and help fill the gaps that these approaches may leave behind.

This thesis will examine two major contemporary schools of thought that answer this question in competing ways: the first, the autonomy approach, holding that civic education should prioritize teaching the importance of rational thought, critical analysis, and autonomous decision making; the second, the tolerance approach, holding that public schools need to tolerate and be accommodating to various comprehensive belief systems, even if those belief systems do not value individual autonomy. My purpose is to assess which, if either, approach best expresses what education in a liberal democracy should be. While both approaches claim to instill values that are congruent with democratic citizenship (autonomy and tolerance), we will see the conflict between them clearly when we examine the approaches in relation to issues of religious freedom

in public schools. The fundamental values stressed by each approach compromise the fundamental values stressed by the other.

Those who argue for autonomy as the essence of democratic education view religious perspectives as sets of ideas that can be approved or disapproved by students through rational thought and analysis. This view holds that students should be exposed to many conceptions of the good life, but should develop the capacity to judge those conceptions through independent thought processes and choose amongst them accordingly. Those who propose the tolerance approach believe the state should show tolerance and respect for many different models of life, even those that may not value or emphasize autonomous decision making or deliberation of beliefs.

To see the tension between the two theories, consider the following: a public school teaches the importance of critical thinking and individual autonomy as vital to democratic citizenship. The school presents various comprehensive belief systems as subjects to be studied, rationally deliberated, and perhaps to be chosen as believable or falsifiable by individual students. Many religious parents object to this autonomy approach to civic education because their religious doctrine does not value disengagement from one's spiritual identity. It might be argued that individual autonomy undermines the very essence of said religious doctrine, which calls upon believers to faithfully and obediently follow traditional authority. There are many religious people who view their religious identity as central to their being; this thesis will explore this idea further through the writings of Michael Sandel. The autonomy approach may be seen by devout religious people as a threat to their religious freedom, insofar as the approach encourages one to learn to stand and think outside of one's religious framework.

If the state supports autonomous decision making in regard to perceptions of the good life, it is, some will argue, undermining the legitimacy and inclusion of some belief systems that do not view religious identity as a choice, or as being based on fact or critical thinking. Rational analysis and evaluation of all ideas, including religious beliefs, is a way of life that runs counter to many identities. The tolerance approach to civic education does not require people to detach themselves from their religious beliefs, which may be central to their existence. In many cases, as we will explore later, the tolerance approach allows students with such beliefs to opt out of classes or lessons that are problematic for them or their religious communities. Those who advocate for the tolerance approach believe that a true democratic state should value the freedom of communities to practice their beliefs and the state should not attempt to strip citizens of their identities in an effort to establish common ground. The counterargument from the theorists who value autonomy suggests that rational analysis and autonomous decision making are necessary for a democracy to function efficiently, and the state risks undermining the development of such vital democratic skills by allowing exceptions for specific belief systems. In addition, supporters of the autonomy approach argue that all children should not be deprived of the right to develop these skills in preparation for choosing the life that they wish.

Thus, the controversy centers on different conceptions of democratic ideals and how they are to be pursued in the context of public education. The presence of religion in this thesis is solely to provide the best example of the way the autonomy and tolerance approaches to civic education come into conflict with each other. The highly contested nature of this topic prevents me from having a set of given standards by which to judge each approach. The standards of civic education are themselves being argued about, and this thesis will be my attempt to enter that conversation. While I am able to apply the autonomy and tolerance approaches to religion in

order to gain more insight into which works best for civic education, the standards are in play simultaneously. The skills and virtues that are vital for democratic citizens are themselves up for contention, and thus it is not fitting for the approaches to civic education to be evaluated based upon rigid formulaic standards. Instead, clear, insightful and rational judgment of several theorists' ideas, coupled with real examples of these approaches in action, is the soundest way to proceed.

While some might be hesitant to evaluate these approaches without a given set of standards to determine which is more democratic, such standards are not plausible because democratic ideals are manifested in various ways to different people. Even more problematic, some ideals are fundamentally at odds with one another when we examine them through the context of religion in public schools, like autonomy and tolerance. In America, an increasingly diverse population of students has pushed the controversy into the spotlight. There is no absolute consensus on what should be required of democratic citizens, and in turn no shared consensus on what democratic skills should be taught and promoted in civic education.

Those who value individual autonomy view the tolerance approach as fundamentally undemocratic because it places little or no imperative on critical reflection and detachment of one's personal beliefs from political decisions. On the other hand, those who believe civic education should promote tolerance of all religious beliefs view the teaching of individual autonomy as undemocratic because of its subversion of traditional identities. This thesis will analyze the findings of four renowned contemporary political theorists who address these difficult questions and attempt to evaluate them critically. This thesis will seek to enter the conversation centered on the question: Which theoretical approach, autonomy or tolerance, is the more democratic model of civic education in a liberal democracy? I hope to arrive at a rational

judgment through assessing the strengths and weakness of each approach by examining how they handle the issue of religion in public schooling.

This thesis will present analyses and criticisms of four major contemporary theorists in the realm of civic education in liberal democratic society. For the tolerance approach, I will focus on the work of William Galston, in his articles “Civic Education in the Liberal State” and “Two Concepts of Liberalism”, and Shelley Burt, in her articles “Religious Parents, Secular Scholars: A Liberal Defense of an Illiberal Education” and “In Defense of *Yoder*: Parental Authority and The Public Schools”. For the autonomy approach, I will focus on the work of Amy Gutmann, in her book *Democratic Education* and her article “Civic Education and Social Diversity”, and Stephen Macedo, in his book *Diversity and Distrust* and his article “Liberal Civic Education and Religious Fundamentalism: The Case of *God v. John Rawls?*”.

### **The Tolerance Approach**

This section will examine the tolerance approach through the arguments of contemporary theorists William Galston and Shelley Burt. We will consider how the proponents of the tolerance approach call for broad acceptance of comprehensive belief systems in civic education in the name of preserving religious freedom and the legitimacy of private spiritual life. In this way, the tolerance approach focuses on the democratic ideals of individual liberty and simultaneous coexistence among diverse groups. The tolerance approach favors a system of civic education that champions and preserves our differences and fights fervently to prevent the stripping of individual beliefs in the name of commonality. Galston writes, “What we share, beyond all our differences, provides the basis for a civic education valid across the boundaries of

our differences” (“Civic Education in the Liberal State” 93). Galston often references the idea of a “common citizenship”, in which one of the only things democratic citizens in a multicultural society have in common is an understanding that we are all different, and civic education should protect these differences.

In such a “Diversity State”, public education should “afford maximum feasible space for the enactment of individual and group differences, constrained only by the requirements of liberal social unity” (“Two Concepts of Liberalism” 524). This idea about “maximum feasible space” calls upon state actors and educators to allow the “widest possible acceptance” of comprehensive belief system. In other words, to be as tolerant as possible in order to be inclusive of those holding views that might not be considered mainstream. That being said, Galston does not propose the acceptance of any and all comprehensive belief systems in the public sphere of the liberal state. In his description of the “Diversity State”, Galston sets out three constraints on religious groups entering into the public sphere: the protection of human life, the protection and promotion of normal development of basic capabilities, and the development of “social rationality” (“Two Concepts of Liberalism” 524). We will examine these in greater depth in the “Analysis and Discussion” section. In return, the state should allow broad parental authority and refrain from prescribing “curricula or pedagogic practices that require or strongly invite students to become skeptical or critical of their own ways of life” (“Two Concepts of Liberalism” 526).

Galston argues that civic education should seek to protect minority groups from “majority usurpation” (“Civic Education in the Liberal State” 94). Anything less than allowing the “maximum feasible space” for such groups is a violation of the spirit of democracy and forces many citizens into isolation. Citizens who feel that their beliefs are being undermined by the state may be forced to “request a kind of resident alien status” within their own community

(“Civic Education in the Liberal State” 95). Without accommodation and exemption, minority groups may begin to feel that the burdens of citizenship are not worth the benefits. This could result in a withdrawal from public engagement, which is not conducive to a healthy democratic state or fulfilled democratic citizens. Even proponents of the autonomy approach agree that engaged citizens are necessary for a liberal democratic state to thrive, but they are less willing than Galston to be tolerant of certain ideologies. Galston is willing to concede that there are certain reasonable limitations on “maximum feasible space” for religious groups, which will be analyzed in detail in the “Analysis and Discussion” section of this paper.

Galston’s strongest argument in favor of the tolerance approach to civic education has to do with the involvement of the state. Many opponents of the tolerance approach argue that children living in a diverse democratic society must be taught to think critically and deliberatively about their inherited beliefs in order to engage in a more personal and deeper search for their truth. Galston allows that perhaps the “unexamined life is not worth living”, but that should not be what this discussion is about, rather it should be about “whether the liberal state is justified” in integrating its own beliefs about the reflective aspect of life (“Civic Education in the Liberal State” 99-100). Galston’s approach to civic education puts greater emphasis on the private family life and is hesitant to allow states to, in his view, encroach on individual lifestyle choices in the name of creating common democratic citizenship.

Galston answers that civic requirements do not entail “a need for public authority to take an interest in how children think about different ways of life. Civic tolerance of deep differences is perfectly compatible with unswerving belief in the correctness of one’s way of life” (“Civic Education in the Liberal State” 99). One does not need to accept that his or her beliefs might not be true in order to be a functioning citizen of a multicultural democracy. In the name of what is



best for democracy, education should seek to provide the greatest possible space for diverse beliefs. Galston writes, “Properly understood, liberalism is about the protection of diversity, not the valorization of choice” (“Two Concepts of Liberalism” 523). The tolerance approach views its tenets as exemplars of democratic ideals, those of the freedom to stay true to one’s inherited beliefs and the protection of diversity. We will see how this conflicts with the autonomy approach later in this paper.

Galston even argues that “civic deliberation is also compatible with unshakable personal commitments” (“Civic Education in the Liberal State” 98). In saying that civic deliberation and deeply rooted religious beliefs can coexist, Galston is in turn lowering the bar for critical thinking and deliberative skills in favor of “minimal civic commitments” (“Civic Education in the Liberal State” 98). For example, an Evangelical Christian might not accept the physical history of Earth that her science teacher presents to her, but this does not indicate that she is incapable of being an engaged student. The state’s role in civic education should be to protect the individual freedom to maintain one’s own beliefs, not to inculcate a “single debatable conception of how human beings should lead their lives” – a conception bound by rigorous critical reflection of one’s deepest convictions (“Civic Education in the Liberal State” 101). When a democratic state commands its citizens to abide by one way of life, despite innumerable differences and various belief systems, the state itself becomes illiberal. As Galston puts it, the democratic state “betrays its own deepest – and most defensible – principles” (“Civic Education in the Liberal State” 101).

Shelley Burt also advocates for the tolerance approach in civic education. Burt falls in line with William Galston in her defense of maximum tolerance of comprehensive belief systems in the public school setting. Burt and Galston’s similarities can be seen through their shared

defense of the U.S. Supreme Court decision in *Wisconsin v. Yoder* to allow Amish students to leave public school after eighth grade, which violated the Wisconsin state law demanding compulsory school attendance until age 16. Galston notes that the *Yoder* decision has been attacked by many liberals “on the grounds that allowing the Amish parents to prevail risks undermining the development of autonomy in Amish children” , but he maintains that the state had no compelling or superseding interest in thwarting the wishes of the Older Order Amish Community (“Two Concepts of Liberalism” 517).

The Court in *Yoder* offered another rationale for its decision to exempt the Amish from Wisconsin’s law. According to the Court, the evidence showed that “respondents sincerely believed that high school attendance was contrary to the Amish religion and way of life, and that they would endanger their own salvation and that of their children by complying with the law” (Cornell Law *Wisconsin v. Yoder* (No. 70-110)). Galston’s stance on this case echoes back to his argument that the government must not enforce the Socratic notion that the “unexamined life” is not worth living, because to do so would be to exercise normative, rather than political, influence over citizens’ lives. The Free Exercise Clause of the First Amendment, cited in the Court’s opinion, prevented the state from interfering with such deeply held convictions, especially since the Amish were offering an alternative form of education suited to their way of life. The Court concluded that the “evidence showed that the Amish provide continuing informal education to their children designed to prepare them for life in the rural Amish community” (Cornell Law *Wisconsin v. Yoder* (No. 70-110)).

Burt agrees with Galston that *Wisconsin v. Yoder* was decided correctly, but she argues that the Court paid too little attention to the children at stake in their decision. She writes, “by grounding its decisions entirely on the free exercise of parents, the Court too quickly foreclosed

the claims of children to the state's independent attention" ("In Defense of *Yoder*: Parental Authority and the Public Schools" 413). Burt's "Principle of Parental Deference" calls upon the state to defer to parents in the name of their children's needs, not as a principle of adult liberties. The state's interest in developing children's critical reasoning skills and autonomous decision making "excludes from consideration not only the needs of children as moral and spiritual beings, but their interests as members of distinct cultural communities" ("In Defense of *Yoder*" 425). In fact, Burt proposes that it should be the state who works to minimize parental "objections to the content of their children's education", as opposed to the parents being forced to compromise their beliefs to fit the rigid confines of public schools ("Religious Parents" 53). This paper will later explore how this opposes the autonomy approach to civic education, which places the needs of the state to produce democratic citizens over the desires of religious parents.

Burt also argues that many comprehensive belief systems, such as that of the Old Order Amish Community, may not be fundamentally "opposed to the development of 'habit and skills of critical thinking' per se – just to the texts and methods used to teach it in public schools" ("In Defense of *Yoder* 416). Indeed, the state's idea of what it means to be deliberative and critical is constrained solely to the secular world, when in reality there is an entire realm of religious theological debate. Burt writes, "To reject secular standards of reasoning is not to prove oneself incapable of rational deliberation about the good life" ("Religious Parents" 66). Indeed, Burt argues that religious and theological debates are often robust and diverse. Though some hold the view that religion is fundamentally unreasonable and does not encourage critical thinking, Burt argues that this is another misunderstanding of religious teachings. "To religious believers, one teaches children about God so that they can reason correctly.

To disrupt this process too early is not to facilitate rational deliberation, but to deprive a child of the conceptual tools necessary to make sense of the world” (“In Defense of *Yoder*” 417). This disruption led the Amish to ask for total withdrawal from the public school system at age 14 instead of 16 to avoid “contamination” by influences outside of the community (“Religious Parents” 52). Burt offers a compelling case for the value of religious thought in the face of a widely held Western view of religion as “backwards”. “In the face of an aggressively materialistic culture”, many parents may seek to provide their children with a “sense of the transcendent in human life” (“Religious Parents” 63). Instead of restraining and chastising believers, religion and spirituality actually have the power to liberate people from the chaos and corruption of modern society.

Burt also notes that the Amish case is not a violation of civic education because Amish parents were not asking to “control” or alter public education, but rather to remove their children from the institution at a certain point altogether (“Religious Parents” 52). If the state is concerned about the education of citizens who will grow up to participate daily in mainstream democratic life, the Amish should be of little or no concern. The Court puts forth, and Burt agrees, that the state’s claim that it is empowered to “extend the benefit of secondary education to children regardless of the wishes of their parents cannot be sustained against a free exercise claim of the nature revealed by this [the Old Order Amish Community] record” (Cornell Law *Wisconsin v. Yoder* (No. 70-110)). The “record” of the Amish in this case included:

[C]onvincing evidence that accommodating their religious objections by forgoing one or two additional years of compulsory education will not impair the physical or mental health of the child, or result in an inability to be self-supporting or to discharge the duties and responsibilities of citizenship, or in any other way

materially detract from the welfare of society. (Cornell Law *Wisconsin v. Yoder* (No. 70-110))

These reasons for exemption are important because if the Amish had not been able to prove that the health of their children or their futures as citizens were not at risk, the outcome would have likely been different. Of course, this conclusion depends on one's views about the standards and commitments of democratic citizenship. Burt argues that the Amish should be granted this exemption because they are not guilty of what she calls "triumphalism", which occurs when parents raise their children to bring their religious beliefs into the public sphere in the form of "political action, to seek legislative change not on the basis of a community consensus but in conformity to the revealed word of God" ("Religious Parents" 68). Burt argues that parents who are guilty of "triumphalism" are "doing a grave disservice to a democratic polity" ("Religious Parents" 68). Burt argues that since the Amish are not attempting to infiltrate the political realm with their religious beliefs, they are responsible citizens.

It is important to note this distinction because it reveals that Burt acknowledges that there should be some sort of boundary between religion and public politics. That being said, Burt maintains that she believes public education has the potential to be a positive experience for even the most religious children – all the more reason why the government should make public education as inclusive of minorities as possible. Burt writes:

If children are truly to have the choice of a strong religious faith, their early contact with the pluralistic and secular values of a modern society must be guarded and carefully supervised – we cannot make the choice for them; public

school is good for children and we ought to try to keep them in it. (“Religious Parents” 66)

In other words, the state has to choose between ostracizing religious minorities and accommodating them in the classroom. Burt argues that the latter choice is the most conducive to both the freedom of religion and a healthy democratic state – one that values tolerance of and accommodation for many different belief systems.

Burt is very hesitant to bite the bullet so quickly on the need for allegedly illiberal ideologies to be ostracized from civic education. She is very cautious not to say that there are some marginalized minority groups that simply do not fit into the liberal democratic model and therefore must bend and break until they do fit. As opposed to citizens tailoring their private beliefs to the needs of the state, Burt suggests that it is the political system that should offer more accommodation and exemption for marginalized citizens. Burt writes:

We should see parental requests for accommodation not as unacceptable threats to the transmission of needed civic virtues but as commendable efforts to assure that their families’ legitimate (if not mainstream) moral and religious commitments are not directly undermined by the children’s classroom experience. (“Religious Parents” 55)

In this way, Burt and Galston share the conviction that the state’s interest in fostering a certain model of democratic citizenship should not dictate or overshadow the individual beliefs of children and their families. Though theorists who fall under the autonomy approach umbrella might argue that accommodation of this sort may lead to the degradation of the vital democratic

values, Burt stipulates that this is only true if we accept undoubtedly that autonomous decision making and critical thinking skills are required to be a good democratic citizen.

Burt grants that there must be limitations to the accommodation of allegedly illiberal ideologies in the public sphere. As stated earlier, Burt allows that religions with a “triumphalist” political approach should be a concern to the state. This describes religions and comprehensive belief systems that are “united by the conviction that the less distance between church and society the better” (“Religious Parents” 68). In addition, Burt concedes that religions or organized comprehensive belief systems that deprive children of being educated citizens should not be welcome or accommodated in the context of civic education. This seems like a vague and ambiguous qualification at first, but Burt attempts to specify what qualifies as such depravity: “for example a religion that forbade the acquisition of basic literacy” (“Religious Parents” 68). Burt goes on to clarify that a liberal state could tolerate the private practice of such a religion on the basis that religion is essential to identity, but it is “neither necessary nor desirable to privilege religions that require such fundamental deprivations” (“Religious Parents” 68). In addition, religions that subvert “constitutional principles” – “for example by advocating the strict segregation of races” – ought not receive special exemption or accommodation in public schools.

Burt offers a final set of cases regarding religion in public schools that are especially problematic and complex. Burt argues that when religious beliefs or practices “set themselves against liberal democratic principles not protected by the constitution”, the state should defer to parental authority (“Religious Parents” 69). Burt considers the example of the inculcation of gender roles by parents versus by the state. Burt writes:

The state may wish to raise boys and girls to similar roles in society...But absent a constitutional affirmation that men and women are to be treated equally in American society, the schools cannot claim a right to impose this preference on children over the religious (or purely customary) objections of their parents.

(“Religious Parents” 69)

This argument is congruent with Galston’s idea that the state should not criticize or endorse different lifestyle choices or practices in the public sector. It is not the state’s role to pass judgment on beliefs if said beliefs do not directly violate the law, but as we will consider later, this case in particular is not as easily pushed aside. Burt argues that parents should be allowed to request that their children have an “opt-out option” when the curriculum challenges beliefs that do not overtly contradict the constitution. Echoing back to the gender role example, Burt concludes that “Girls raised in this way will make decent, law-abiding citizens, even if, from the standpoint of liberal democratic ideals, they have not been treated entirely justly” (“Religious Parents” 69). This bold assertion directly contradicts the autonomy approach, as we will discuss further, because Burt believes that children have a right to practice their inherited beliefs and remain loyal to their religious communities, even if those beliefs contradict mainstream liberal ideology.

### **The Autonomy Approach**

Stephen Macedo enters the conversation about civic education and the role of religion in public schools with a concept he calls “Political Liberalism” - originally put forth by John Rawls. Echoing the sentiments of Rawls, Macedo’s theoretical approach to comprehensive belief systems in public schools proposes that citizens ought to “defend basic principles of justice by



relying on public reasons that we can share while disagreeing about our ultimate commitments” (“Liberal Civic Education and Religious Fundamentalism: The Case of *God v. John Rawls?*” 478). This requires that civic education instill citizens with the necessary skills for such a robust form of public debate. Such skills include critical thinking and autonomous decision making.

Macedo rejects Galston’s “maximum feasible accommodation of diversity” as not being conducive to the needs of a healthy democratic society. Macedo writes:

The indiscriminate embrace of difference and diversity should be resisted. Inevitably, some groups will be marginalized and feel oppressed by even liberal public policies...Unfortunate as they are, such feelings may indicate the need for adjustments not in public policy but in the group. (“Liberal Civic Education” 469)

Recall that this is a direct contradiction to the tolerance approach assertions that the state should bend to the needs of parents, not the other way around. Macedo settles on this concept of “Political Liberalism” as a sort of compromise between the demands of the public realm and the diversity of the private realm. He argues that there are “basic matters of justice” that are “widely acceptable to reasonable people”, and these shared “political values” are what we should focus on in the public realm (“Liberal Civic Education” 471). Macedo points to values such as peace and freedom that “can be shared by reasonable people” (“Liberal Civic Education” 480). It may be argued that these values are vague and their meanings can be understood in many different ways, but Macedo maintains that people of all religious and secular beliefs are able to access such foundational principles and appreciation of such values will assist in the implementation of public reason. He argues that these are such fundamental, uncontroversial, widely accepted

values of liberal society that even religious people can and should work within them in the public sphere.

Macedo is quick to reassure us that he is not in favor of stifling diversity; rather, he believes it ought to be monitored and regulated to ensure the health of the liberal democratic state and to protect rights of children to explore what it means to live a good life for themselves. He writes, “Diversity and difference, like all good or potentially good ideas, can be taken to an extreme or grasped in the wrong way” (*Diversity and Distrust* 10). Macedo is in favor of maintaining a society that allows space for the expression of many different conceptions of the good life. He writes, “By all means, let us celebrate a mutually respectful liberal democratic diversity, let us approach settled social and political expectations in a critical spirit” (*Diversity and Distrust* 26).

Despite these claims about maintaining inclusivity, he acknowledges that “there will often be groups whose comprehensive conceptions exist in decided tension with the shared values of the political order” (“Liberal Civic Education” 483). It would be naïve to think that all faiths and belief systems will fit in equally to the liberal model. For example, consider ideologies that are overtly racist, sexist, homophobic, or simply preach hate and disgust of people who are noticeably “the others”. Macedo asks, “Why should we apologize if disparate burdens fall on proponents of totalistic religious or moral views who refuse to concede the political authority of public reason? We must not forget how such people would behave if they had political power” (“Liberal Civic Education” 484). Macedo bites the bullet on expansive accommodation for such groups. He is against allowing space for groups that “thrive on ignorance and the demonization of others” (*Diversity and Distrust* 26). He argues that in order for peaceful groups to fully enjoy a diverse society, the groups that threaten such a society must be marginalized. As such, Macedo

asks all religious groups to adopt the doctrine of Political Liberalism. He grants exemption or accommodation only when two conditions apply: there are “extraordinary burdens” placed on a religious group by this doctrine *and* exemption can be granted “without great damage to the basic integrity of the public order” (“Liberal Civic Education” 490).

Absent such requirements for exemption, Macedo argues that every citizen ought to fully participate in civic education, and that the model ought to instill the values of individual autonomous decision making, critical thinking, and objective evaluation of all belief systems. Such a robust account of civic education is necessary not only to produce active, invested citizens, but to equip children with the necessary skills to face such a diverse world. “Some level of awareness of alternative ways of life is a prerequisite not only of citizenship but of being able to make the most basic life choices. This ground alone might well be adequate to deny the claimed right to opt out” (“Liberal Civic Education” 486). Because such skills are not inherent, civic education must teach them. “Because liberal democratic beliefs and dispositions are not innate, and because we cannot count on a civic invisible hand to engender them, we must consciously attend to (as Macedo puts it, ‘plan for’) their cultivation” (Galston *Rev. of Diversity and Distrust* 37).

Macedo illustrates his argument though an analysis of *Mozert v. Hawkins*, which “involved a 1983 complaint by ‘born again’ Christian families against the local school board in Hawkins County, Tennessee” (“Liberal Civic Education” 470). “Seven families of fundamentalist Christians in Tennessee filed suit in federal court to challenge the required use in public schools of a series of basic readers published by Holt, Rinehart & Winston” (Sherman 20). Vicki Frost, a fundamentalist parent and the lead plaintiff in the case, testified that there were seventeen categories of “offending material” in the elementary level reading program that

subjugated her fundamentalist Christian beliefs (Suber “Mozert v. Hawkins City Bd. of Education” Part B). For example, the parents cited:

[P]assages that reflected favorably on such concepts as pacifism, world society, women in nontraditional roles, and futuristic supernaturalism (as reflected, for example, in a poem called *Seeing Beneath the Surface* that described use of the imagination to see things not discernible through the physical senses). (Sherman 20)

The fundamentalist parents argued that the reading curriculum degraded their religious beliefs by presenting an “uncommitted, evenhanded nature of the presentations” and exposing the children to “a variety of points of view” which denigrated “the truth of their particular religious views” (470-471). It is important to note that the parents’ complaints were not exclusively about the substance of the conflicting ideologies. Rather, the parents were rejecting to the mere introduction or mention of ideas not present in the Bible. As Amy Gutmann notes:

Their religious convictions (although not those of their entire congregations of all other fundamentalist Christians) command them not to expose their children to knowledge about other ways of life unless the exposure is accompanied by a statement that their way of life is true and all the others are false and therefore inferior. (“Civic Education and Social Diversity” 571)

The mere presence of such secular ideas was enough to have the fundamentalist parents up in arms. The religious parents asked for an opt-out option from the reading program for their children.

To many secular liberals, the demands of the fundamentalist parents seem outrageous. It is difficult for many to imagine a school curriculum that does not encourage children to use their imaginations. Let us consider a more secular example in an attempt to understand the frustration of the Vicki Frost and the rest of the fundamentalist parents. Let us imagine that we are parents and our children attend public school in Vermont. Our children come home from school one day and say they learned about the 9/11 terrorist attacks in history class. We ask them what they learned. Our children say they learned that there are many different ideas about what actually happened on September 11, 2001; some argue that upwards of 3,000 people were killed in a terrorist attack carried out on American soil, while some argue that the entire thing was a hoax or conspiracy created by the American government. Our children say that their teacher did not weigh in at all about which is true.

As concerned liberal parents, many of us would be very offended by this lesson on 9/11. But what is our complaint? The school is exposing our children to ideas that we believe to be absolutely false, and it compromises the validity of what we know to be true. Even though the teacher or the reading material does not make any assertions on the truth of either of these ideas, the mere presence of ideas that we *know* to be false is offensive. We ought to try to understand that this is how Vicki Frost and the rest of the fundamentalist parents feel. They know that the Bible is the truth, and when their children are exposed to ideas that threaten that truth, they feel like their beliefs are under attack by the state.

Perhaps we can understand the perspective of the fundamentalist parents in *Mozert*, but proponents of the autonomy approach argue that the very foundation of civic education is a stake here. Stephen Macedo argues that important liberal principles are at risk of being undermined by fundamentalist parents. “How can tolerance be taught without exposing children to diversity and

asking them to forbear from asserting the truth of their own particular convictions, at least for political purposes?” (“Liberal Civic Education” 471). Macedo concedes that the mandatory reading program may interfere with the “parents’ ability to teach their children their particular religious views”, but he has doubts about whether such an interference is morally indefensible in the name of Political Liberalism.

Though Macedo acknowledges that such vigorous liberal ideology can be alienating for some groups and should not overtake the public realm, he argues that people “who disagree about their highest ideals and their conceptions of the whole truth, might nevertheless agree that public aims such as peace, prosperity and equal liberty are very important” (“Liberal Civic Education” 474). The health of our democratic society depends on people’s ability to find and apply the most basic tenets of public reason and truth. We cannot consciously allow children to pass through the public school system and become of age to vote at 18 without being exposed to at least the existence of ideas such as equality among genders, the use of imagination, or pacifism. In essence, the nature of people’s beliefs matter much less to society as a whole than the willingness of said people to “put some of our (true) beliefs aside when it comes to laying the groundwork for common political institutions”, such as public schools (“Liberal Civic Education” 474).

Given this application of Political Liberalism to public schools, Macedo concludes that the claims of the fundamentalist parents in *Mozert* are not strong enough to warrant an exemption from the reading program. Macedo grants that the reading program does “impose disproportionate burdens” on the fundamentalist parents, but the state’s interest in instilling and preserving public reason prevails (“Liberal Civic Education” 485). This aligns with Judge Kennedy’s concurring opinion in the U.S. Sixth Circuit Court of Appeals decision, which

reversed the district court decision and subsequently upheld the required reading program set out by Hawkins County Board of Education. Judge Kennedy concluded that “even if there were a burden, the state had a compelling interest in ‘teaching students about complex and controversial social and moral issues’ that is essential for preparing school students for citizenship and self-government” (Sherman 20). Macedo writes, “[W]e must remember that the source of the apparent ‘unfairness,’ the cause of the ‘disparate impact’ here, is a reasonable attempt to inculcate core liberal values” (“Liberal Civic Education” 485). Thus, Macedo is willing to take religious concerns into account, but such concerns must not counteract or dilute the state’s interest in pursuing “reasonable common efforts to insure that all future citizens learn the minimal prerequisites of citizenship” (“Liberal Civic Education” 485-486).

In her book *Democratic Education*, Amy Gutmann argues similarly that the state has a profound interest in tailoring civic education to its own needs. Civic education should “foster the capacities for democratic deliberation essential to conscious social reproduction” (*Democratic Education* 288). The liberal state is a product of human collaboration and is responsible for reproducing and maintaining itself. In order to do this successfully, there must be an institution that instills citizens with common civic values, such as critical thinking and autonomous decision making. Gutmann argues that the public school system is the institution responsible for such a task. Gutmann articulates her understanding of civic education as the cornerstone for democratic life. She writes, “Good laws, which are the consequence of peaceful political agitation in a democracy, are the source of good education, and good education in turn creates good citizens” (*Democratic Education* 282).

Gutmann sees deliberation and critical thinking as essential attributes of a democratic citizen because “people who give careful consideration to the morality of laws can be trusted to

defend and to respect laws that are not in their self-interest, at the same time as they can be expected to oppose laws that violate democratic principles” (*Democratic Education* 52). In this way, Gutmann reveals that she is wary of acquiescence, obedience, and deference to tradition, as such values have the potential to make people blind to laws that may be unjust, inefficient or unreasonable. The autonomy approach, according to Gutmann, is the avenue through which the vitality of a thriving and progressive democratic state can be preserved and passed on to subsequent generations.

Gutmann echoes many of the same concerns as Macedo about the tolerance approach to civic education. Gutmann is especially wary of allowing children - who should be, in theory, learning how to be good democratic citizens - to approach conflicting ideology from an uncritical and traditionalist standpoint, or to “opt out” of exposure to conflicting beliefs altogether. Exposure to many competing ideologies is a critical aspect of democratic life, and it requires that students be equipped with the necessary skills to evaluate such ideologies from an objective perspective. Gutmann writes, “However students have been socialized outside of school, there should be room within school for them to develop the capacity to discuss and defend their political commitments with people who do not share them” (*Democratic Education* 107). One need not necessarily abandon her inherited beliefs, but she ought to learn how to step outside herself in order to see the bigger picture, both for her own sake and for the sake of a multicultural liberal state.

Like Macedo, Gutmann acknowledges that it is naive to think that all belief systems will fit perfectly into the liberal model of civic education. She writes, “Treating every moral opinion as equally worthy encourages children in the false subjectivism that ‘I have my opinion and you have yours and who’s to say who’s right?’” (*Democratic Education* 56). Students ought to be



equipped with a critical eye and a strong sense of individual autonomy that allows them to detach themselves from their inherited beliefs. Gutmann goes on to say that “false subjectivism” does not take the “demands of democratic justice seriously” (*Democratic Education* 56). She makes no apologies for the fact that some religious groups may feel marginalized by the secular standards of civic education.

Indeed, Gutmann does not even contend that secular standards of reasoning and reflection are “neutral” compared to religious standards. She writes, “secular standards constitute a better basis upon which to build a common education for citizenship than any set of sectarian religious beliefs - better because secular standards are both a fairer and firmer basis for peacefully reconciling our differences” (*Democratic Education* 103). Though Gutmann’s “fairer and firmer” argument is a bit vague for such a divisive claim, she goes on to articulate that the bedrock of democracy rests on our collective journey and “common” values (*Democratic Education* 103). To find this common ground, we must step outside of the religious realm and reconvene from a secular point of view. This process is bound to be easier for some groups than others.

Gutmann considers the *Mozert* and *Yoder* cases to illustrate her views on liberal democratic theory. Gutmann makes a point to acknowledge the value of the religious beliefs at stake in these cases. “Were these ways of life without value, there would be no moral problem. Where they of absolute value, the moral problem would also disappear” (“Civic Education and Social Diversity” 566). The other things of value at stake, according to Gutmann, are the skills needed to participate and thrive in a liberal democratic state. Gutmann continues, “The dilemma of diversity arises because the value of a conscientious way of life apparently comes into conflict with the terms of fair cooperation among citizens” (“Civic Education” 566). In other words,

those who defer to tradition over reflection and obedience over choice have trouble fitting the requirements for this particular model of civic education.

According to Gutmann, the *Mozert* parents were requesting too much from the state when they “objected to exposing their children to any ideas or information with which they disagree on religious grounds unless the ideas and information are accompanied by a statement that their religious beliefs are the only true ones” (“Civic Education and Social Diversity” 566 Footnote 13). Such intolerance of exposure to conflicting belief systems significantly challenges the foundation not only of civic education but of liberal democracy itself, Gutmann argues. For example, the contested curriculum in the *Mozert* case involved the children reading about Renaissance ideology, such as “the dignity and worth of human beings” (“Civic Education” 566). Gutmann responds by arguing that such a concept is too central to the foundation of liberal democratic society itself that no student should be exempt from learning it. She proposes that the autonomy approach to dealing with religions and comprehensive belief systems in the public school system is not only in the best interest of the state, but of the children. To allow the fundamentalist parents to deprive their children of such a basic tenet of democratic life is not only to undermine the interest of the state, but the rights of the children. The parents’ desires must not overshadow the needs of the children, who have the right and responsibility to become engaged democratic citizens (“Civic Education” 577).

Like Gutmann, we explored how Shelley Burt is also concerned with the rights and needs of the children in these cases. However, Gutmann argues that the fundamentalist parents are getting in the way of their children’s future as democratic citizens, whereas Burt argues that the state is obstructing the children’s spiritual needs. Thus, we see that the autonomy approach is fundamentally at odds with the tolerance approach, in that the former views the state as

responsible for providing children with skills and opportunities for a free and fulfilling life, whereas the latter views the state as responsible for protecting the children's right to practice their familial and communal beliefs. Both Burt and Gutmann wish to preserve the freedom of children, but Gutmann understands true freedom as the liberty to choose, the acquisition of the knowledge required to do so, and the necessary space to at least temporarily detach oneself from the constraints of one's inherited beliefs.

In the spirit of providing children with the freedom of choice, Gutmann maintains that civic education can and should instill children with the ability to “deliberate critically among a range of good lives and good societies” (*Democratic Education* 44). When considering the *Yoder* case, Gutmann is admittedly concerned about the state's desire to keep children in school, but she is also gravely worried about children being deprived of opportunities based on their parents' beliefs. She writes:

By shielding their children from worldly knowledge (past the eighth-grade level), the Old Order Amish would effectively prevent them from having the basic opportunity available to other children to choose among the self-sustaining ways of life available outside the small Amish community. (“Civic Education and Social Diversity” 568)

To those who say that the religious freedom of the Amish is at stake, Gutmann argues that we cannot allow for the overextension of parental authority in the name of religious freedom. The religious freedom of the Amish parents “does not extend to exercising power over their children so as to deny them the education necessary for exercising full citizenship or for choosing among

diverse ways of life that lie outside the Amish community” (“Civic Education and Social Diversity” 570).

Gutmann considers the ever-popular argument that the Amish are a largely separatist group that should be left to its own devices since it does not ask for much from the government in return. Gutmann writes:

Unlike almost all other religious groups, the Amish have done their best, out of deep conviction, to establish a separate society within American society...Unlike almost every other religious denomination in this country, the Amish have long lived the life of partial citizens. (“Civic Education and Social Diversity” 569)

Gutmann rejects this argument, however, in the interest of the Amish children. Amish children enter the public school system as individuals independent of their communal backgrounds with the right to a civic education that will adequately provide them with the skills and opportunities to make their own choices. Gutmann concludes:

Amish children are not solely creatures of their religious community. They are also potential citizens and individuals in their own right, and the separatist commitments of their parents need not prevent a liberal democratic state from ensuring that children are educated for full citizenship or individuality or autonomy. (“Civic Education” 570)

A child has the right to a full and enlightening experience in public schools. If the child goes through the ideal experience as Gutmann has previously described, he will be ready to make his own decision about his future inside or outside of the Amish community. Either way, he will

have genuinely participated in the ideal form of civic education. If he is deprived of this opportunity, the liberal democratic state has failed him.

Gutmann argues that the fundamentalist parents in *Mozert* are doing their children a much greater disservice. We have established that supporters of the autonomy approach are not solely interested in what is positive and necessary for the state, but also what is good for children. In many cases, Gutmann argues, such necessities are one in the same; what is good for the democratic state is good for adolescent democratic citizens. Gutmann writes:

[M]ost (if not all) of the same skills and virtues that are necessary and sufficient for educating children for citizenship in a liberal democracy are those that are also necessary and sufficient for educating children to deliberate about their way of life, more generally (and less politically) speaking...[T]here is in liberal political practice little difference between educating for citizenship and educating for individuality or autonomy. (“Civic Education and Social Diversity” 573)

Civic education fails if it neglects to inculcate certain values and skills. If the curriculum were in line with the wishes of the fundamentalist parents, it “would interfere with teaching the virtues and skills of liberal democratic citizenship on any reasonable understanding of what liberal democratic citizenship entails” (“Civic Education and Social Diversity” 572). Gutmann does not apologize for the fact that public schools should not and cannot reasonably appease the demands of the fundamentalist parents. “The parents objected to teaching children to make critical judgments, to use their imaginations, and to exercise choice ‘in areas where the Bible provides the answer’” (“Civic Education and Social Diversity” 571). Such skills are not up for

negotiation, especially when the group asking for exemption is so extensively involved in American political life.

### **Criticisms**

Thus far, we have explored the assertions of both the autonomy approach and tolerance approach. This section will analyze the way supporters of the autonomy approach criticize the assertions made by supporters of the tolerance approach, and vice versa. The autonomy approach rests on the assumption that mainstream liberal thought must be protected and actively instilled in young democratic minds. Theorists who support the tolerance approach challenge the claim that liberal secular values, such as individualism and autonomy, are in danger of being overshadowed in the face of religious doctrine. Shelley Burt writes:

When it comes to providing the next generation of American citizens with a sense of the different ways in which one can be a good human being, it seems to me that the message of the dominant secular culture is not in danger of being drowned out by the strictures of marginal sectarians. (“In Defense of *Yoder*” 426)

Galston takes this argument a step further. He writes, “The greatest threat to children in modern liberal societies is not that they will believe in something too deeply, but that they will believe in nothing very deeply at all” (*Liberal Purposes* 255). If the state encourages the autonomy approach to civic education, religious children will be left with a watered-down version of their beliefs and only their individual autonomy to guide them, which is of grave concern for religious parents. This particular line of defense against the tolerance approach proposes that Gutmann and Macedo’s accounts of civic education are idealistic. Burt and Galston argue that proponents of the autonomy approach have unrealistic expectations of the guidance and structure offered by

public schools. Public schools are not by any means the only way for children to be exposed to diverse belief systems and lifestyles, and the “dominant secular culture” is too diluted of substance and morals to offer children any true guidance or support.

From a practical standpoint, Burttt certainly raises an interesting argument. Aside from completely separatist communities, it would be difficult to argue that any religious group is completely isolated from conflicting belief systems. However, Macedo and Gutmann are not arguing solely for bare and unfiltered exposure to diverse ideologies. Gutmann argues that public education can and should provide an exceptional avenue for students to be exposed to different beliefs, as well as to engage in “understanding, respecting, and accepting unfamiliar ways of life not their own” (“Civic Education and Social Diversity” 572). It could even be argued that exposure to diverse belief systems solely through popular culture or mainstream media is open to political manipulation and subject to prejudice, whereas the public school system can serve the role of a more regulated setting equipped with academic resources and facilitators. For example, if we accept that it is inevitable that most adolescents will be exposed to some sort of sex education, whether it be through MTV, gossip in the cafeteria, or Health Class, it seems only reasonable that most parents would prefer the option of Health Class. Gutmann and Macedo would likely argue that it is naive to think that we can protect or shield our children from every idea we do not agree with; a more realistic approach is at least to allow a more appropriate setting to take the reins when such ideas are discussed.

Supporters of the autonomy approach also find supporters of the tolerance approach to be naive about the risks of “maximum feasible accommodation” for comprehensive beliefs that do not necessarily fit cohesively with secular liberal society. Gutmann and Macedo would likely argue that in our current liberal state we simply cannot see the dangers of such expansive

tolerance. Macedo writes, “Our current notion of ‘difference’ is far too thin and devoid of moral content to characterize what it takes to constitute the shared life of a reasonably stable, peaceful and mutually respectful urban order” (*Diversity and Distrust* 26). In other words, it is easy to advocate for “maximum feasible accommodation” when illiberal groups are buried beneath the surface of public life. Recall that Burt and Galston do set limits to toleration; Burt asserts that the state need not tolerate groups that are “triumphalist” in the political sphere or groups that undermine “constitutional principles” (“Religious Parents” 68). Illiberal groups - characterized by racist, sexist, and/or homophobic sentiments - do not typically rise and permeate the public sphere overnight, however. If such groups are allowed the chance to emerge, given the arguably vague limitations set by the tolerance theorists, we may head down the slippery slope of allowing illiberal ideology to permeate and spread throughout the public and political realms. “[T]he celebration of peaceful diversity behooves us to try and understand what must be done from a political standpoint to keep Sydney from becoming Sarajevo, or Boston from becoming Beirut” (*Diversity and Distrust* 26).

Supporters of the autonomy approach argue that broad accommodation and exemption for religious groups gives “too much to diversity and too little to shared liberal purposes” (“Civic Liberal Education” 491). In this way, the tolerance approach in practice runs the risk of undermining a vital component of democracy: the ability of citizens from all religious and ethnic backgrounds to put aside their private beliefs in public so that we might work together towards the common good. Macedo writes, “It is hard to see how schools could fulfill that core liberal civic mission of inculcating toleration of other basic civic virtues without running afoul of complaints about ‘exposure to diversity’” (“Civic Liberal Education” 486). Perhaps citizens of a multicultural liberal society must accept that they will be exposed to many different belief



systems that will likely challenge their own, but this is an unavoidable aspect of successful civic education.

On the other hand, proponents of the tolerance approach would likely respond to Macedo's claim by arguing that the state can hardly be trusted to inculcate tolerance in its citizens if the state itself is intolerant of certain belief systems - such as the fundamentalist parents in *Mozert*. Galston argues that the autonomy approach to civic education is much too exclusive for those with belief systems that do not necessarily value autonomy and critical reflection of one's beliefs. The autonomy approach, according to Galston, is not "robust enough to generate anything like a liberal account of protection for individuals and groups against the possibility of majority usurpation" ("Civic Education in the Liberal State" 94). Thus, we can see that both approaches are concerned with taking the demands of a liberal democratic society seriously, but they are fundamentally at odds about what those demands should be.

While proponents of the autonomy approach are concerned with providing students with the necessary skills to prosper and to contribute to a lively democratic state, the proponents of the tolerance approach seek to promote a culture of toleration and expansive religious freedom. The debate ultimately comes down to a disagreement about which set of democratic ideals - state tolerance of marginalized belief systems or state support of providing all children with opportunities to exercise their autonomy - should govern our model of civic education. By evaluating the two ideals side by side, we have seen how it is difficult to promote one without compromising the other.

## **ANALYSIS AND DISCUSSION**

Both the autonomy approach and the tolerance approach can be deconstructed, analyzed, and applied to real-world examples. We can probe and exploit each argument for points of weakness, but we will eventually hit the point where no objective argument can reasonably declare one set of values absolutely more important than another - critical reflection or tradition, individual autonomy or loyalty to family and community, the obligation of the liberal state to provide a child with opportunities and skills or the obligation of the liberal state to refrain from interfering with religious freedom. Such judgments are subjective, and cannot be measured as one being more democratic than the other. Though the philosophical debate cannot technically be solved, the question could be put up as a matter for the polity to vote on. The majority could, in theory, rule on which approach to civic education it found to be more democratic. This could reveal a great deal about the kinds of democratic ideals that are most widely valued in our liberal democratic society, but it could not settle the philosophical question of which approach is actually more democratic. The result of the vote would shed light on the popular will, but it would not necessarily mean that the chosen approach is undoubtedly a legitimate manifestation of idealistic democratic values. This discussion of civic education will remain in the philosophical realm. In this analysis, I will consider the contemporary understanding of religious identity, the reality of the limitations on religious freedom laid out by the tolerance approach, whether certain belief systems should be accommodated in the public realm, and the alleged importance of individual autonomy presented by the supporters of the autonomy approach.

It is somewhat easy for proponents of the autonomy approach to dismiss religious beliefs as simply one more aspect of a person's chosen or acquired identity. Many Westerners are comfortable with the idea of trying different religions or congregations. The widespread and socially acceptable practice of conversion illuminates this understanding of religion as choice.

Consequently, many do not see anything problematic about calling upon religious people to set aside such beliefs in the public realm in the name of common public reason that can be accessed or understood by all. This conception of religion is easy and comfortable, but in many cases it is fundamentally inaccurate.

For many people, religion is an inherited characteristic of birth, as vital if not more so to their identities as gender, ethnicity or nationality. It is not desirable, nor even possible, for such people to detach themselves from their religious beliefs. To do so would be an utter violation of their true identity, a demolition of their soul. In addition, for many of these believers, their religion is not a burden, but a gift – a constant source of light and guidance in a world without any other answers. Many do not view this attachment as oppressive or undesirable and do not wish to be “saved” by secularism, or a more diluted version of their religious practices. Thus, for proponents of the autonomy approach to call on citizens to put religious ideology aside in the name of public reason is simply not feasible. Such orthodox individuals should not have to place something as transient and man-made as democracy above immovable religious conviction. Moreover, a modern liberal democratic state should not commit such an “assault” on their inherent identities, as Vicki Frost put it.

Michael Sandel explores this idea through his definition of the “unencumbered self” (“The Procedural Republic and the Unencumbered Self” 86). Sandel writes, “Now the unencumbered self describes first of all the way we stand toward the things we have, or want, or seek. It means there is always a distinction between the values I *have* and the person I *am*” (Sandel 86). The unencumbered self is not bound by ingrained principles or values. “No role or commitment could define me so completely that I could not understand myself without it” (Sandel 86). For our purposes, such an unencumbered self can be understood as someone able to

separate herself from her religious or comprehensive beliefs; her “commitment” to them is not essential to her existence. The unencumbered self would seamlessly apply the autonomy approach to her life because what matters most to her is not her system of beliefs, but her “capacity to choose them” (Sandel 86). Such a person would understand true freedom to be absolutely unencumbered by any comprehensive belief system, governed only by her free will. Of course, to be free in this way could also be understood by some as being vacuous or lacking substance. “What is denied to the unencumbered self is the possibility of membership in any community bound by moral ties antecedent to choice; he cannot belong to any community where the self *itself* could be at stake” (Sandel 87).

Sandel ultimately argues that we cannot view ourselves as “independent selves” without sacrificing our ingrained values or convictions. He says that we cannot separate ourselves “without cost to those loyalties and convictions whose moral force consists partly in the fact that living by them is inseparable from understanding ourselves as the particular persons we are - as members of this family or community or nation or people...as citizens of this republic” (Sandel 90). Sandel makes the interesting argument that the idea of a democratic republic itself demands an adherence to instilled values and an allegiance to a particular way of life. The liberal democratic state demands a certain “moral depth” that calls upon citizens to remain true to their intrinsic democratic values. Loyalty to justice, equality, and liberty, for example, can be seen as ingrained in the core of a democratic citizen - one who cannot understand himself with his allegiance to such ideals. Thus, some might argue that one can only become unencumbered at the cost of diluting every value or conviction one holds. This particular understanding of unencumbrance means that the self is left feeling vacuous and devoid of all substance, as the erosion of the very core of her being ensues.

The other understanding of the unencumbered self views the process of freeing oneself from constitutive principles as the mere imposition of another belief system. As one set of values moves out, another must move in. The self is never fully empty. To the proponents of the autonomy approach un-encumbrance may sound like liberation, but many devout religious believers would likely argue that to detach from religious convictions in the name of public reason is simply to become bound to another set of beliefs. Individual autonomy and critical reflection do not leave citizens completely unencumbered by any sort of foundational beliefs; the allegiance is simply shifted from traditional, unquestioning religious beliefs to objective reasoning and critical thinking. To internalize the autonomy approach to civic education is to shift the foundation of one's decision-making from a sense of obedience or loyalty to a rational and independent understanding of the world. Galston explains the Enlightenment roots of the autonomy approach as "the experience of liberation through reason from externally imposed authority" ("Two Concepts of Liberalism" 525). In other words, we are encumbered by our own authority and standards, not those of any particular religious or comprehensive belief system. In this approach, freedom is revered as total individualism and independence. The self is only influenced by her own rationality, deliberation, and conscience. Her decisions are not held up to any other standards, such as religious commandments, save her own.

While it is true that proponents of the autonomy approach, such as Macedo and Gutmann, do propose a detachment from religious beliefs in the public realm, their intent is not to rob people of their freedom. In fact, Macedo and Gutmann argue that civic education, when executed properly, has the ability to give children their freedom - the freedom to choose, to be independent, to break free from the constraints of their inheritance that may be holding them back from a new understanding of the world around them. Though some devout religious

believers might argue that this is just encumbrance in another form, Gutmann and Macedo would likely maintain that the autonomy approach enables people to be beholden to themselves and their own moral compass, rather than the rigid confines of ancient religious doctrine. Under the autonomy approach to civic education, children are free to practice and uphold religious values, but they should not be robbed of the opportunity to make that choice for themselves.

Supporters of the tolerance approach would likely respond to such criticisms by noting that even the tolerance approach does not condone unfiltered acceptance of illiberal ideologies that significantly infringe upon basic human rights. Children should still be offered protection from certain religious doctrine that could result in major harm. Galston describes three limitations on “maximum feasible accommodation” for comprehensive belief systems. Most of Galston’s limitations on the actions of religious groups are obvious and widely agreed upon in our contemporary society. He outlines three interests that “warrant public interference with group practices”: 1. “The protection of human life...no free exercise for the Aztecs”; 2. The protection of “normal development of basic capacities”; 3. The development of “social rationality”, which fosters an understanding “needed to participate in the society, economy, and polity” (“Two Concepts” 524-525).

Let us consider these limitations individually. The forbiddance on human sacrifice is hardly contested in a modern liberal state, and his reference to the Aztecs is not directly applicable to the issue of civic education today. Galston takes the protection of “normal development of basic capacities” to mean that the state should not allow communities to “bind infants’ skulls or malnourish them in ways that impede physical growth and maturation” (“Two Concepts of Liberalism” 525). Once again, Galston uses archaic and unacceptable behavior in a liberal democracy in an attempt to demonstrate that there are in fact some belief systems he will

not tolerate. The prohibition of binding of infants' skulls is a much less complicated issue than the questions posed in *Yoder* and *Mozert*. If by the "promotion of normal development of basic capacities" Galston meant that students ought to learn how to objectively consider different cultures and beliefs in order to coexist in our society, then a debate could ensue. Of course, this is not what Galston takes this limitation to mean, and thus this limitation is largely uncontested and does not strengthen the tolerance approach.

Galston's third limitation reveals the true collision between the autonomy and the tolerance approach. Galston argues that the state must protect a child's right to the development of "social rationality", but he is cautiously vague about what that specific skills are required for such rationality. He acknowledges that there must be some sort of common ground for democratic citizens to maintain an effective and cooperative state. Such common ground is an example of the "institutional preconditions" needed for a multicultural democratic state; "no pluribus without the unum" ("Two Concepts" 525). It is important to note that Gutmann and Macedo would agree with Galston in this aspect about the need for public reason that can be accessed by all democratic citizens. Galston draws the lines at the inculcation of individual autonomy, however. He does not accept that the promotion of autonomy is an appropriate way to establish the necessary common ground. Galston argues:

The promotion of personal autonomy is not among the shared liberal purposes. Autonomy is one possible mode of existence in liberal societies - one among many others...one must recognize the need for respectful coexistence with individuals and groups that do not give autonomy pride of place. ("Two Concepts of Liberalism" 525)

This is a familiar argument for proponents of the tolerance approach, but it may not fit Galston's own limitations. If a child does not need the ability to think for herself to sort through the innumerable belief systems and ways of life in a multicultural democratic state, then what does she need? Galston concedes that there is *something* required for "social rationality", but is hesitant to articulate what that might be.

Galston's brief and only description of "social rationality" is "the kind of understanding needed to participate in the society, economy, and polity" ("Two Concepts of Liberalism" 525). This definition is largely unhelpful for our purposes, as it does not offer any concrete answers as to what this "kind of understanding" ought to entail. In another instance, Galston argues that civic education ought to provide children with "the beliefs and habits that support the polity and enable individuals to function completely in public affairs" ("Civic Education in a Liberal State" 98). The only specifics that Galston offers are that civic education must teach children to have "respect for the law" and enable them to "become adults capable of caring for themselves and their families" ("Civic Education in a Liberal State" 98). Such specifics sound much more in tune with the autonomy approach than Galston probably intends. Given Galston's relatively lax requirements for establishing common ground and public reason, we can infer that Galston's account of citizenship requires much less than Macedo's or Gutmann's.

The most glaring issue with Galston's tolerance approach is that his meaningful limitations draw ambiguous lines that exclude certain religious behaviors, which is not congruent with his main arguments about tolerance. For example, Galston writes, "The state must safeguard the ability of individuals to shift allegiances and cross boundaries" ("Two Concepts" 522). Galston is in favor of the state protecting individuals from being "coerced into, or trapped within, ways of life" ("Two Concepts" 522). Consider this role of the state in the case of *Wisconsin v.*



*Yoder*. Many argued that the state had a compelling interest in safeguarding the future of the Amish children and providing them with the opportunity to continue in the public school system. The state wished to provide the Amish children with an education equal to that of their peers.

Despite this inconsistencies in Galston's arguments, some might still find the tolerance approach more in tune with a modern liberal democratic state; it preserves the freedom of individuals and communities to peacefully coexist in mainstream society and opt out when they must. Or does it? Galston himself even draws lines in the sand, declaring that the state ought to bear some responsibility to the children of religious communities. Galston claims to be more inclusive than Gutmann, but these examples put that in question. If the substance of the line drawn might result in the same exclusion of particular religious practices, Galston may not be truly the most accommodating in practice. When applied to concrete scenarios such as *Yoder*, Galston's limits on accommodation may be closer to those of Gutmann or Macedo than he suggests.

Gutmann and Macedo point out that the decision to exempt the Amish from compulsory public education after eighth grade was a failure of the state to provide children with the opportunities for autonomous decision making and independent reflection on their inherited beliefs. Therefore, it could be argued that the state did not, as Galston puts it, "safeguard the ability of individuals to shift allegiances and cross boundaries" ("Two Concepts" 522). Of course, children still technically have the right to leave the community, but how might they do that if they are not exposed to anything other than what their parents teach them? Public education is supposed to provide them with the opportunity to be exposed to what lies beyond the Amish borders. Granting exemption from compulsory education, granted this case upheld mandatory primary schooling, runs at least the mild risk of undermining that process. Setting

aside the substantive disagreements over *Yoder*, it is still important to note that Galston's seemingly weak limitations on religious freedom actually have the potential to be as exclusive as the autonomy approach. If we accept this to be true, it becomes even more difficult to distinguish between the democratic values supported by each approach.

Thus far, we have considered the limits of the tolerance approach and the possibility that the approach may not be as accommodating as it appears. We have seen how Galston's own limitations crumble under their application to the *Yoder* case, but we must consider the other side of this case. Gutmann and Macedo make impassioned arguments that the decision to accommodate the Amish in *Yoder* puts both the interests of the liberal democratic state and the needs of impressionable children at risk. Even if we accept that removing Amish children from public education two years before state law mandates will undermine the development of individual autonomy and critical reflection, it is still up for discussion whether or not these skills are absolutely necessary for one to be a good democratic citizen. In his opinion for the Court, Chief Justice Burger wrote, "Absent some contrary evidence supporting the State's position, we are unwilling to assume that persons possessing such valuable vocational skills and habits are doomed to become burdens on society should they determine to leave the Amish faith" (406 U.S. 205 *Wisconsin v. Yoder* No. 70-110). Thus, it is possible to grant the Amish exemption if we accept relatively minimal standards of citizenship. For Chief Justice Burger and Galston, the Amish are acceptable citizens so long as they do not significantly burden the state. Supporters of the autonomy approach demand a much more robust and involved approach to democratic citizenship.

Gutmann makes the case that certain kinds of accommodation or opt out options for religious communities are not desirable for the liberal democratic state nor the children involved.

Let us examine the specific complaints of the fundamentalist parents in *Mozert*. The parents objected to, among other things:

(1) a short story describing a Catholic Indian settlement in New Mexico on grounds that it teaches Catholicism; (2) a reading exercise picturing a boy making toast while a girl reads to him ('Pat reads to Jim. Jim cooks. The big book helps Jim. Jim has fun.') on grounds that 'it denigrates the differences between the sexes' that the Bible endorses; (3) an excerpt from Anne Frank's *Diary of a Young Girl* because Anne Frank writes in a letter to a friend that nonorthodox belief in God may be better than no belief at all... ("Civic Education and Social Diversity" 571)

Imagine if the state were to modify its entire curriculum to fit the needs of these fundamentalist parents. Civic education would become so watered down that it would basically consist of "teaching literacy and numeracy" ("Civic Education and Social Diversity" 572). If the state were to allow the children of fundamentalist parents to opt out of so many crucial aspects of the curriculum, there would be a significant minority of democratic citizens who would enter the adult world without knowing how to "use their imaginations and exercise critical judgment" ("Civic Education and Social Diversity" 572). Gutmann argues that the *Mozert* parents are fundamentally confused about civic education because they equate exposure with indoctrination. The curriculum does not call upon children to hold certain beliefs, but rather to be aware of and understand the expansive body of beliefs outside of their own.

As previously discussed, Gutmann argues that the skills necessary to be a reliable democratic citizen are also "relevant to our choosing a good (nonpolitical) life for ourselves"

(“Civic Education and Social Diversity” 573). Consider the gender roles example. Would it be accurate to call our society a liberal democracy if not all children learned that boys and girls need not have designated roles or exhibit predetermined behaviors? While it is reasonable to accept that children are not merely part of a nation, but also a family and potentially a religious community, the liberal democratic state should function as a protector against the potential repression executed by familial or religious affiliations. Just as the state would be justified in interfering if a father was physically abusing his daughter, the state should also be concerned if the family or religious community is depriving children of opportunities available to others. While these two situations pose obviously different levels of danger, Gutmann and Macedo might argue that mental and intellectual health is just as vital to a free and fulfilling life as physical health. Children are entitled to access and participate in discussions about equality and diversity. The state cannot consciously allow young girls to be removed from a lesson that exposes them to the idea that perhaps sometimes the boy will prepare food instead.

This is not to say that Galston and Burt do not value children’s rights to lead fulfilling lives. They simply understand fulfillment to be of a different nature. For example, recall that Galston drew the line for “maximum feasible accommodation” at human sacrifice - “No freedom of religion for the Aztecs”. This may seem like a simple and widely accepted conclusion, but consider the reasoning behind Galston’s discomfort with human sacrifice for religious purposes. Other than the mere fact that most modern religions have evolved past the belief that human sacrifice is necessary or acceptable, Galston argues that such a practice undermines the value of human life, the protection of which is “a central liberal purpose” (Two Concepts of Liberalism” 525). In a way, Galston finds that each individual human has the independence and freedom to breathe in and out on his own terms. The state ought to protect human life on the basis that it is

so valuable and delicate that it should not be controlled or manipulated by anyone other than the self.

This begs the question of what aspects of human life are so essential to its intrinsic value that the state ought to interfere? Can one's life truly be protected if the freedom to be exposed to diversity and to choose one's associations is not protected? Many argue, with good reason, that the value of human life does not simply mean the right to be alive, but the right to be free and equal. What is required for such a life may demand more than Galston advocates for. Gutmann and Macedo find that the state ought to be responsible for ensuring that all children are provided with the opportunity to think for themselves and choose their own path towards the good life. In some cases, religious parents may get in the way of this. Burt argues that we are to defer to parental authority, but what if parents do not offer their children what they are entitled to as citizens of the free world? This is not to say that all religious beliefs undermine freedom or autonomy, but there is surely a significant minority that holds beliefs that do.

Regardless of these examples of Galston's somewhat faulty limits on accommodation, one might even come to the conclusion that there are simply some beliefs or behaviors exhibited by religious communities that the state ought not to accommodate in the context of civic education. There are some beliefs that supporters of both the autonomy and the tolerance approach agree should not be accommodated at the public level. Burt cites an example of this agreement: "[T]o use Amy Gutmann's example, white parents objecting on religious grounds to their child sitting next to black classmates need not and emphatically should not receive a hearing from school authorities" ("Religious Parents" 69). Examples such as these are hardly problematic any more in our contemporary liberal democracy in the sense that the vast majority

of people have the the same response to such racist ideology - it is not welcome in the public sphere.

Most of the contemporary controversial beliefs causing tension in the classroom are far less simple to solve. Consider religious parents who wish to only expose their children to traditional gender roles. Burttt writes:

The state may wish to raise boys and girls to similar roles in society, recognizing the desirability of having all citizens be financially independent and the justice of offering opportunity in politics and economics to both sexes. But absent a constitutional affirmation that men and women are to be treated equally in American society, the schools cannot claim a right to impose this preference on children over the religious (or purely customary) objections of their parents. (“Religious Parents” 69).

First, Burttt seems to easily shake off the idea that the constitution protects equality amongst genders, which is unsettling and unsatisfying. Gutmann and Macedo would likely argue that egalitarianism is fundamental to a healthy democratic state, which is why they also argue for equal education and opportunity. To accommodate such inequality in the public realm would be, from this perspective, a blatant mistake and would subvert the needs of both the state and the students. Where supporters of the tolerance approach defer to parental or religious authority, Gutmann and Macedo take a different course of action.

In order to accept that individual autonomy and critical reflection are vital ideals to instill in our children, we must first be able to identify what makes these values so essential. The first level of reasoning is for political purposes. From a purely pragmatic standpoint, liberal

democracies depend on informed and independent citizens to vote and be engaged in civic life; this is necessary for the health and reproduction of our government. This level of civic engagement demands the use of public reason in order to ensure debates that can be accessed and understood by all. Not only are religious arguments unwelcome in the political sphere, but civic engagement in a modern liberal democratic society requires citizens to be aware and understand many different belief systems. Multiculturalism demands tolerance, and tolerance demands exposure. It is difficult to accept and understand that which you do not know. Macedo put it this way in his discussion of *Mozert*: “How can tolerance be taught without exposing to children to diversity and asking them to forbear from asserting the truth of their own particular convictions, at least for political purposes?” (“Liberal Civic Education and Religious Fundamentalism: The Case of God v. John Rawls?” 470).

On a more philosophical level, Gutmann and Macedo argue that individual autonomy, exposure to conflicting belief systems, and the ability to critically reflect upon our beliefs as well as others’ are necessary for individual growth. Macedo writes, “Some level of awareness of alternative ways of life is a prerequisite not only of citizenship but of being able to make the most basic life choices. This ground alone might well be adequate to deny the claimed right to opt out” (“Liberal Civic Education and Religious Fundamentalism: The Case of God v. John Rawls?” 486). Many religious communities do not demand that their children be completely sheltered from any and all alternative beliefs or perceptions of the good life, but the fundamentalist parents in *Mozert* did. Unless such alternative belief systems were presented as false, the fundamentalist parents would not support the curriculum. Of course, the liberal state cannot favor or present one religious belief system as truth and others as false, so this leaves the

state to either force the children to remain studying the curriculum by law or to allow an opt out option.

## **Conclusions**

Though we have established that it is nearly impossible to reach a concrete philosophical answer as to what should warrant an opt out option, if we are guided by the following two questions, we may be able to settle such disputes on a case by case basis: (1) Are the needs of the children protected, in that they will be treated equally and acquire the skills to think freely in preparation for the life they may choose? (2) Is the future of the liberal democratic state at serious risk? By this point, we know that the questions may be interpreted differently and the answers may be vastly subjective, but these questions will guide us by the democratic principles of individual freedom and civic engagement. While it may be true that these questions do not directly address the needs of parents, the cases we have examined have shown that desires of parents often clash with and undermine the needs of the children or the state.

Galston and Burttt may argue that the first question is catered to the autonomy approach, but I disagree. First, I am compelled to argue that there are times when an accommodation ought not to be made. For example, the objection to reading material that displays equality among genders is a fundamental violation of democratic egalitarian principles that may be acceptable behind Sunday School doors, but has no place in the public school setting. If a liberal democratic state does not enforce equality at this most basic level, then the state can hardly refer to itself as liberal or democratic. It is true that we ought to remember that many do not see such religious practices as oppressive and do not wish to be freed from them, but we are dealing with children, and that poses a much more thorny issue.



This is a difficult pill to swallow, but at some point is the state not bound to reveal other opportunities to people who can only see what is directly in front of them? What if a young girl is so deeply entrenched in one idea that she cannot even comprehend that another might be a different direction or opportunity? In this case, the answer to our first question is about the *Mozert* case is “Yes”, and the answer to our second question is also “Yes”. The democratic state degrades itself if it cannot protect equality. In addition, the state must consider the future of these children. Many fundamentalists have become highly politically engaged. It may not be safe or wise for a state to allow entire groups of future voters to pass through the public school system without being exposed to the ideas that perhaps women can do the same things as men or that there are other possible perceptions of the good life.

While Galston and Burt’s stances on *Mozert* may not give enough deference to individual freedom, Gutmann and Macedo may be considered idealistic about democratic citizenship. As previously discussed, Gutmann believes that there is no “invisible hand” teaching citizens how to be autonomous and critical, and so the state must actively inculcate such skills. Given that such skills are learned and not inherent, it might be argued that there are natural limitations. Some students may not grow to be as deliberative or rational as others. Thus, even if individual autonomy, critical thinking, and objective rationality are desirable for democratic citizens to acquire and utilize, we may not be able to “build” such skills after a certain point. When considered from this perspective, it is easier to understand how a devout religious person might consider abandoning their religious beliefs at school in favor of the autonomy approach to be a significant sacrifice. Such a person might ask, why should I have to give up or water down my fundamental beliefs in exchange for a man-made approach to life? To which Gutmann and Macedo might reply, democracy itself is a human creation, but that does not make it any less

desirable, and sometimes we must adapt in order for it to work in the inspiring way we know that it can.

Though they disagree about where to draw the line of accommodation, Galston, Burt, Gutmann and Macedo all concede in one form or another that religious beliefs are integral to the human existence and should be taken seriously. Even though Gutmann and Macedo are likely to bite the bullet much sooner on what is acceptable in the public realm, they are both careful to exhibit their understanding and appreciation of religious convictions in the private realm. From a modern Western perspective, it is easy to lose sight of the understanding of religious beliefs as a characteristic of birth, as foundation of the very essence of one's being, or as inseparable from any action or decision. Each and every request for religious accommodation should be taken with the weight of the possibility that civic education is felt as an "assault" on identity. That being said, a liberal democratic state ought to be primarily concerned with protecting its own health and the freedom of individuals to establish their own conception of the good life.

When evaluating the autonomy approach and the tolerance approach, we must remember that the debate ultimately boils down to a disagreement over what true democratic ideals ought to be instilled and preserved through civic education. While I have attempted to enter this debate from an objective perspective, it is important to keep in mind that there is currently not a single, all-encompassing measurement of "true democracy". The sections entitled "The Autonomy Approach", "The Tolerance Approach", and "Criticism" were an attempt to reveal that the debate itself will persevere purely because each side will continue to consider itself more democratic than the other. The "Analysis and Discussion" section was designed to point out the gaps in each approach - how the tolerance approach may not be as accommodating in practice as it asserts in theory, and how the autonomy approach may rest on an idealistic and unattainable

idea about democratic citizenship. The “Analysis and Discussion” section also explored the deeply normative and contested questions about certain behavior or ideas that perhaps should not be accommodated, what makes a human life fulfilling, and when the state may have the right or duty to protect children from an idea - something that may not appear threatening. While we may not be able to settle on an “answer” to a question with so many immeasurable variables, such as what it means to be free and what it means to be a good democratic citizen, we can always echo back to the arguments of Galston, Burt, Macedo and Gutmann on a case by case basis in an attempt to reach a conclusion that will be sound and thorough, though it may be as subjective as the standards of measurement themselves.

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