

## Two Cheers for Parental Empowerment: A Politically Incorrect Analysis

Peter F. Carbone, Jr.  
*Duke University*

Among the numerous proposals for school reform that have surfaced during the past two decades, at least two have garnered near universal approval: parental involvement or empowerment and critical thinking. Current interest in parental empowerment is of course consistent with the prevalent assumption that grassroots reform initiatives are likely to surpass the rather disappointing results achieved thus far in response to mandates emanating from on high, as it were. Meanwhile, American school children are generally seen to be deficient in terms of "higher order," or "critical thinking" skills, and this apparent deficiency is perceived as an impediment not only to students' self-realization, but also to the nation's long-term social, economic, and political well-being.

As a result, these two reformist thrusts have generated an ever growing body of literature — the vast majority of it supportive — over the past several years. But rarely has it been noted that the two could very well be traveling along a collision course. Consequently, that very real possibility (if not likelihood) will be explored in the remainder of this discussion.

### I

Recent years have seen a surge of enthusiasm for a new wave of educational reform, one that is linked to grassroots concerns and hence supportive of parent-teacher empowerment. New-wave proponents have often made the point that the first wave of recent reformism — generated in large part by the appearance of *A Nation at Risk*<sup>1</sup> and the spate of books and reports that followed in the early, and mid-1980s — was characterized by top-down changes, mandated by state officials and imposed on educational practitioners. Since teachers were given little input into the decision-making process, according to this view, they were frequently indifferent, if not downright hostile, to reform initiatives.<sup>2</sup> Parents, meanwhile, often felt left out altogether. Now the obvious remedy for many of those who remain committed to educational reform, but dissatisfied with results to this point, is one that ensures meaningful participation in the planning and execution of reform measures by those who have the largest stake in public education, namely parents, educators, and concerned citizens (together with children, of course). Mary Futrell has observed, in this respect, that:

The second-wave thrust was toward reform efforts that would bring together teachers, principals, superintendents, school board members, parents, and business and community leaders in a culture of cooperation. The local school site would be the focus of reform, and reform initiatives would be tailored to local needs.<sup>3</sup>

The call for increased teacher-parent-community empowerment referred to in Futrell's observation would seem to be an idea whose time has clearly arrived. Indeed, support for the concept appears to be abundant on both ends of the political spectrum, as well as at various points in-between. It is interesting to note, in this

connection, that terms such as “empowerment” and “emancipation,” long-standing staples in the lexicon of left-leaning social and educational reformers, have been appropriated not only by mainstream establishment figures, but also by staunch conservatives. It would appear, then, that education, like politics, is fully capable of yielding its fair share of strange bedfellows. On the other hand, the apparent convergence of left and right on this particular issue may not be quite as surprising as it appears at first glance. For notwithstanding their profound philosophical differences, the two camps have been in agreement, more or less, though for different reasons, on the priority they assign to local control in both political and educational spheres, in their aversion to centralized, bureaucratic authority, and in their skepticism regarding the efficacy (if not the very motives) of big government.

Localism has always enjoyed privileged status among conservative values, to be sure, and it has become increasingly important to leftist reformers since at least the 1960s, when radical commentators grew ever more disenchanted with traditional liberal reliance on governmental intervention as a viable approach to social amelioration. Over the past three decades, in point of fact, government increasingly has become perceived as a major part of the difficulty, rather than a realistic source of solutions to persistent social and educational problems.

The extent to which “localism” has captured the imagination of both lay and professional observers of the contemporary educational scene can be illustrated by the angry response to the suggestion by two schoolteachers a few years ago that parental empowerment may not be an entirely unmixed blessing, that some of the claims being made for parental involvement may have been somewhat inflated, and that in all candor “far too many parents — and not just disadvantaged ones — simply don’t give a damn.”<sup>4</sup> Needless to say, such heresy was widely regarded as comparable to assaults on the flag, motherhood, and apple pie. Therefore it came as no surprise when the teachers were sharply reprimanded in the “Backtalk” section of a subsequent issue.<sup>5</sup> But the two authors were correct, after all, in pointing to the fact that we do exhibit a tendency to romanticize and idealize parenthood, and a reluctance to acknowledge the fact that the educational attitudes of the adult community may in some domains (including, notably, the area of critical thinking) constitute a hindrance to meaningful educational reform.

On the other hand, the irate letter writers were also correct in insisting that most parents do in fact care deeply about their children’s education, and that students tend to do well in school when parents are actively supportive of their efforts. In addition, there is a fair amount of empirical evidence available to support the contention that school-community partnerships, especially those that feature parental involvement, do indeed yield positive results, particularly with regard to increases in student test scores.<sup>6</sup>

## II

Improved test scores, however, are of considerably less importance to new-wave reformers than to their first-wave predecessors. In recent years, as a matter of fact, “new wavers,” and for that matter educators generally, have placed greater emphasis on “higher-order” or “critical-thinking” skills; and therein resides the

potential for a major conflict among advocates for educational reform, for critical thinking as an educational goal has a way of exposing cracks in the wall of consensus alluded to earlier. In actuality, that apparent consensus, the meeting of the minds between representatives of various and diverse social and political persuasions, often turns out to be based on rather different conceptions of what critical thinking really means. For those of a conservative bent, for instance, it often implies facility in solving problems in areas such as mathematics or science, and is thus more or less equivalent to technical or instrumental rationality. Or it may suggest a number of means-ends relationships, such as, the acquisition of cognitive skills considered necessary for students to adjust socially, gain some semblance of economic marketability, and achieve at least minimal civic awareness. Clearly these somewhat benign educational goals need not lead to probing questions regarding the appropriateness of prevailing social, economic, and political conditions, and are therefore unlikely to elicit a great deal of opposition.

Critical thinking in what Richard Paul refers to as the “strong” sense of the term is another matter, however. For Paul, a critical thinker in this sense is one who is sufficiently fair and open-minded to recognize traces of bias or irrationality and other weaknesses in her or his own debatable views and to acknowledge the strengths in the position of one’s opponent.<sup>7</sup> “Strong sense critical thinkers...,” Paul writes, “realize the necessity of putting their own assumptions and ideas to the test of the strongest objections that can be leveled against them.”<sup>8</sup> Harvey Siegel makes a similar point in describing the critical thinker as one who is “appropriately moved by reasons” and who is committed to such principles of rationality as consistency, fairness, and impartiality.<sup>9</sup>

What both Paul and Siegel are getting at is the point that critical thinking involves more than just cognitive processes. It is also dispositional in character. That is to say, critical thinking entails, in addition to cognitive skills and abilities, the disposition to be swayed by relevant reasons even when such reasons constitute a challenge to our emotionally-laden values and beliefs. Hence, critical thinking, as John Passmore has observed, is to no small degree a character trait as well as a set of intellectual abilities or skills.<sup>10</sup>

Moreover, whether critical thinking is “domain specific,” as John McPeck holds,<sup>11</sup> or teachable in isolation in the form of general transferable skills — for example, “identifying assumptions, tracing relationships between premises and conclusions, identifying standard fallacies” — as Siegel argues,<sup>12</sup> surely McPeck is correct in insisting that it entails a healthy skepticism, an unwillingness to “take truth for granted” or at face value in the absence of adequate supporting evidence or compelling reasons.<sup>13</sup> Interestingly, McPeck’s emphasis on skepticism as a defining quality of critical thinking is reminiscent of the Charles Sanders Pierce-John Dewey view that inquiry and what we now refer to as critical thought are inspired by the irritation of doubt, and doubt typically arises when prevailing beliefs, particularly those beliefs to which we are most attached, are called into question.<sup>14</sup> It would seem, therefore, that in order to foster critical thinking, teachers need to encourage students to question (or in the contemporary vernacular, “interrogate”) some of their most deeply held beliefs, many of which, of course, will have been acquired at home.

Small wonder, then, that it has often been claimed that the *real* Dewey never did find his way into the American public-school classroom. Nor is it likely, either, that the welcome mat will be laid out for contemporary advocates of critical thinking in the foreseeable future. Most people, after all, do not share the view that schools should question the local conventional wisdom. On the contrary, they expect the school to reinforce the values they are attempting to instill in children at home. Should the parental inquiry, "What did you learn in school today, Mary and Johnny?" be met with the response, "To doubt much of what you hold dear, oh fallible parents of ours," the wrath of the elders would surely be terrible to behold. As A.C. MacIntyre has noted, in this connection, "The values of rational critical inquiry stand in the sharpest contrast to the prevailing social values."<sup>15</sup>

It seems to me that MacIntyre's observation is right on target. Critical thinking by its very nature is a subversive activity in that it accepts little on faith, and clearly people want to believe. (Most of us seem to prefer the comfort of certainty over the insecurity of doubt.) Hence the critical thinker, as Passmore has observed, is an intellectual disturber of the peace,<sup>16</sup> one who insists on raising questions about matters that others consider settled once and for all.

### III

If the observations of MacIntyre and Passmore are indeed accurate, then perhaps we need to acknowledge the possibility that not only government, but also parents, together with adults in general, may be contributing more to the problem than to its solution. And indeed the contemporary signs are not particularly encouraging, given the extent to which significant numbers of people are still swayed by negative political campaigns (which continue to register gains even when they do not result in victory), receptive to the sales pitches of slick televangelists or The Psychic Friends Network, intolerant of those who hold unconventional views, and eager to censor "offensive" textbooks or otherwise suppress freedom of expression in a variety of contexts (including the university, of all places).

With regard to the widespread problem of book-banning, moreover, it is worth noting that according to People for the American Way, the ever expanding volume of textbook censorship cases reached a new high of 348 in the 1991-92 academic year.<sup>17</sup> It is also noteworthy, incidentally, that such clear-cut threats to the Republic as *Snow White* and *Little Red Riding Hood* have apparently achieved a level of notoriety approaching that of such old standbys as *Catcher in the Rye*.<sup>18</sup> Hence some rather instructive current trends suggest that until the cognitive virtue of rationality is more highly regarded than it is at present, the popular assumption that increased parental and community-wide involvement in educational policy decisions will culminate in reforms of pivotal significance may need to be re-evaluated.

What all of this clearly suggests is the distinct possibility that whatever compatibility may exist between two of the main goals of new-wave reformers — critical thinking and increased community (especially parental) participation in educational decision-making — can be maintained only if critical thinking is understood in a relatively nonthreatening sense, that is, as the employment of cognitive skills in problem-solving and other practical or technical contexts. If

critical thinking is understood, however, as, entailing a skeptical, questioning stance toward prevailing norms, values, and beliefs, then there is a very real probability of tension, if not conflict, between the two aims. Consequently, would-be reformers seem to be caught in a bit of a dilemma: on the one hand they want to instill in students a critical, questioning attitude toward prevailing norms; on the other, they are committed to the educational empowerment of lay adults in the community, most of whom no doubt consider many of those norms to be all but sacrosanct.

There is no easy exit from this dilemma. In order to foster critical thinking in students, we need the support of adults whose own education has been lacking in this respect, and who therefore subscribe to the concept only so long as it is not perceived as a threat to their own emotionally-charged beliefs and attitudes. From what we can glean from the historical record, furthermore, our prospects for securing the needed mandate are rather bleak. An instructive historical case in point can be found, for instance, in the fate of the social-studies textbook series, *Man and His Changing Society*, written by the prominent social reconstructionist, Harold Rugg, and published by Ginn and Co. between 1929 and 1941. Rugg set out to provide an accurate, candid account of American society, warts and all, and remarkably enough the texts were quite well-received at first. Eventually, however, they were labeled "subversive" in various conservative quarters and soon banned in a number of school districts across the country. In at least one community, as a matter of fact, the books were actually committed to the flames!<sup>19</sup>

The attitude of many of Rugg's critics was perhaps best summed up by Ms. Elwood Turner, corresponding secretary of the Daughters of the Colonial Wars, though it was seldom, if ever, so boldly stated. Rugg, Ms. Turner declared, "tries to give the child an unbiased viewpoint instead of teaching him real Americanism. All the old histories taught my country right or wrong. That's the point of view we want our children to adopt. We can't afford to teach them to be unbiased and let them make up their own minds."<sup>20</sup> So much, then, for critical reflection.

#### IV

It would be comforting, of course, to report that the situation has improved considerably since Rugg felt the fury of so many self-appointed censors in the early 1940s. Surely we are a more enlightened, tolerant society now than we were in those relatively unsophisticated days, are we not? Well, in some ways, perhaps, but as the aforementioned report of People for the American Way demonstrates, we continue to display a disturbing penchant for censoring that which various groups large or small (but influential) find offensive.

I think we find an interesting and significant difference in outlook between contemporary liberal reformers and the reconstructionists with regard to school responsiveness to the community. Recent and contemporary reformers have tended to be receptive to the view that the educational bureaucracy has wrested control of the schools from the community. Since the bureaucracy is insensitive to the concerns of the local populace, moreover, the school has lost touch with the very people it should serve and rendered itself irrelevant to the needs of its students. The obvious remedy, accordingly, is to restore "power to the people." For the reconstructionists

(no doubt influenced by events such as the Rugg textbook debacle), conversely, “the people” were often part of the predicament in that they failed to see the need to reform schools along progressive lines. The challenge, therefore, was to enlighten a heretofore uninformed public.<sup>21</sup>

It seems to me that the reconstructionists had a point. It is, of course, unfortunate when school officials and the rest of the community drift apart, but bringing them together will lead to better education only if the influence of enlightened citizens exceeds that of the Archie Bunkers in the community. It is difficult to maintain decent schools when the Bunkers are forever banning textbooks and calling for the dismissal of nonconformist teachers. Uninformed or misinformed parents and their supporters, in other words, are just as likely as misguided educators to create the kind of intolerant, authoritarian atmosphere that stifles critical thinking in students.

Of course the reconstructionists never did figure out how to secure a mandate from the general public for teaching critical thinking in the strong sense, and neither have we. As Paul has observed in this respect, Johnny tends not to reason critically or behave rationally because traditionally our schools have been more concerned with inculcating prevailing beliefs and values than with cultivating the critical skills, needed to examine such values in a reasoned, unbiased manner.<sup>22</sup> As a result, students generally reason egocentrically, according to Paul. They tend to question only those beliefs and assumptions that they have been encouraged early on to reject. At the same time, they find it “very difficult, in some cases traumatic, to question those in which they have a personal egocentric investment.”<sup>23</sup> For Paul such students are at best critical thinkers only in the “weak” sense of the term. If they have mastered critical thinking skills at all, they use such skills “selectively and self-deceptively...to foster and serve their vested interests.”<sup>24</sup>

By way of contrast, strong-sense critical thinkers, as Paul would have it, relish the challenge of meeting counterarguments to their own positions and enjoy the give and take of dialectical/dialogical argumentation.<sup>25</sup> Critical thinkers of this variety, however, are a rare breed in Paul’s estimation because, again, schools have neglected this sort of reasoning. Hence from Paul’s perspective, the intellectual growth of students has been impeded in that their capacity to weigh evidence and assess the import of reasons has been insufficiently nurtured.<sup>26</sup>

In one way or another, Peirce, Dewey, the reconstructionists, Siegel, McPeck, and Paul are all calling for people to adopt a cluster of intellectual virtues: reasonableness, rationality, “healthy” skepticism, tolerance, openmindedness, fairness, impartiality, and also to be disposed to act in accordance with those virtues. But the fact of the matter is that such virtues and dispositions remain in short supply in our society, and for that matter as Paul suggests, (echoing MacIntyre) perhaps in any society.<sup>27</sup> Further, there is still no visible sign of a forthcoming mandate from the general public to foster them. Thus a vicious circle presents itself. Each generation of students emerges from formal education with little or no appreciation for critical thinking and hence no burning desire to see it cultivated in the next generation. And of course none of this augurs well for a society that aspires to freedom and openness. For, as Paul notes, “an open society requires open minds.”<sup>28</sup>

## V

Well, then, if the populace for the most part has an aversion to critical thinking, at least in the strong sense, should we not bow to its wishes and abandon the quest? Not necessarily. Not unless "democracy" is viewed somewhat simplistically as little more than a head count to settle disputed matters of policy. If, on the other hand, it is viewed (at least ideally) as a commitment to formulate public policy on the basis of reflection and reasoned deliberation; and if, further, it is understood, at least in part, as government by informed consent, and informed consent, in turn, implies at least a minimally enlightened citizenry,<sup>29</sup> then the extent to which the educational views of adults should be honored becomes problematic, especially when those views are inconsistent with the democratic principles just enumerated.

Hence Amy Gutmann invokes the principle of "nonrepression," which precludes the state, or parents, or anyone else, for that matter, from restricting the development of rational deliberation in children.<sup>30</sup> In a liberal, democratic society, in other words, neither parents nor other adults are entitled "to undermine the future deliberative freedom of children."<sup>31</sup>

Traditionally, of course, the prevailing assumption has been that parents enjoy an all but absolute control over the education of their children. As Margaret O'Brien Steinfelds has observed in this regard, "the overwhelming weight of history, law, and moral thought has been on the side of parental rights authority, and responsibility."<sup>32</sup> Yet, the justification for total parental dominion over children has never been firmly established. Indeed, as Francis Schrag has shown, most of the standard justifications have withstood close scrutiny with limited success, at best.<sup>33</sup> Consequently, the notion that children may have their own interests, independent of, or even in conflict with, those of their parents, has been steadily winning adherents over the past three decades. On that account, it is hardly unusual, for example, for the courts to intercede on behalf of a child whose parents refuse to permit physicians to treat the child in a life-threatening situation. As the Yoder case<sup>34</sup> indicated, however, the courts have not yet demonstrated the same willingness to intercede on the side of children against their parents with regard to educational issues. Still, Justice William Douglas's vigorous dissent in that particular case did provide additional impetus to the emerging notion that children may very well enjoy rights (including those pertaining to education) that stand in marked variance to the interests of their parents.

In addition, the state, too, as Gutmann points out, has a stake in the education of children because of its own interest in their adopting the values, ideals, and character traits necessary to sustain itself.<sup>35</sup> The fact of the matter, then, as Schrag has observed, is that several parties — the children themselves, their parents, and the community — all have legitimate interests in how children are educated, and it is hardly unusual for those interests to conflict with one another.<sup>36</sup> Schrag also notes that there is no simple formula for weighing these conflicting interests, since complicated questions regarding justice, happiness, equality, and other values are involved in the equation.<sup>37</sup>

Philosophically, then, the right of a democracy to preserve itself by initiating students into the values (including critical judgment) and processes that sustain an



open society would appear to be at least as compelling as the right of parents to transmit their own religious and other values to their children. In fact, Gutmann argues, rather convincingly it seems to me, that even in cases of competing rights between children and their parents in which the issue is the child's right to education vs. his or her parents' right to the free exercise of religion, the state should be entitled to intervene on behalf of the child because for the child, education is a prerequisite for participating, eventually, as an informed citizen in the political processes of a free society, and for choosing between competing conceptions of the good life (both of which are of paramount importance in a liberal democracy). Given these considerations, according to Gutmann, "we ought to conclude that parental rights of free exercise cannot override a child's right to education."<sup>38</sup>

Whether or not children do indeed have a right to an education is of course yet another problematic point and one that is pertinent to this discussion. Bertram Bandman, for example, has argued, persuasively I think, that no one has yet demonstrated the existence of such a right on legal, generational, (parental obligation), or natural grounds.<sup>39</sup> Bandman does, however, leave open the possibility that a case might be made on moral grounds for the concept of education as a right, provided that cogent arguments can be marshaled in support of the claim; and it seems to me, in this respect, that Gutmann's attempts to link the alleged right to democratic values may be construed as a step in that direction.

Unfortunately, we do not have sufficient space in this context to evaluate these important and intriguing issues. Besides, the interesting philosophical questions raised in connection with them may very well be moot, since philosophical considerations are seldom any match for political realities at least in the short term, and the political reality in this context, as we have noted previously in this discussion, is that critical thinking in our society is rarely contemplated with an aura of wonder and reverence. Though we can derive some comfort from the conclusion that the public's apparent aversion to critical thinking need not deter us, theoretically, from advancing it as an educational goal, the fact remains that our prospects for securing from the adult population the aforementioned needed, but elusive, mandate to actually encourage critical thinking in the strong sense seem as remote as ever. And in the absence of such a mandate, finally, our fond hope for forging an effective alliance of parental empowerment and critical thinking will probably remain visionary for the foreseeable future. Let us then view parental empowerment as a positive step toward educational reform, deserving of two cheers, surely, but perhaps not the full complement of three.

---

1. *A Nation At Risk: The Imperative for Educational Reform* (Washington, D.C.: U.S. Department of Education, 1983).

2. Richard J. Altenbaugh, "Teachers, Their World and Their Work: A Review of the Idea of 'Professional Excellence' in School Reform," in *The New Servants of Power*, ed. Christine M. Shea, Ernest Kahane, and Peter Sola (New York: Praeger, 1989), chap.13.

3. Mary Hartwood Futrell, "Preparing Students for Tomorrow's Political World," in *Education Reform, Making Sense of It All*, ed. Samuel B. Bacharach (Boston: Allyn and Bacon, 1990), 261. Due to space limitations, we shall limit our discussion here to parental empowerment and postpone for the time being a discussion of teacher empowerment.



4. Anne C. Walde and Keith Baker, "How Teachers View The Parents' Role in Education," *Phi Delta Kappan* 72 (December 1990): 319-22.
5. "Backtalk," *Phi Delta Kappan*, 72 (April 1991): 646-47.
6. See, for example, the special issue on "Parent Involvement," guest edited by Joyce L. Epstein, *Phi Delta Kappan* 72 (January 1991). See also Joyce L. Epstein, "School Policy and Parent Involvement: Research Results," *Educational Horizons* (Winter 1984): 70-72.
7. Richard Paul, *Critical Thinking: What Every Person Needs to Survive In a Rapidly Changing World* (Rohnert Park, Calif.: Sonoma State University), 132.
8. *Ibid.*, 568. See p. 9 for Paul's account of "weak-sense" critical thinking.
9. Harvey Siegel, *Educating Reason: Rationality, Critical Thinking and Education* (New York: Routledge 1988), 32-34.
10. John Passmore, "On Teaching to be Critical," in *The concept of Education*, ed. R.S. Peters (New York: Routledge & Kegan Paul, 1967), 195.
11. John E. McPeck, *Critical Thinking and Education* (New York: St. Martin's Press, 1981), 3-5.
12. Siegel, *Educating Reason*, 20.
13. McPeck, *Critical Thinking and Education*, 6-7.
14. C.S. Peirce, "The Fixation of Belief," *Popular Science Monthly* (November 1877): 1-15. The doubt-thought-belief sequence set forth in this article is echoed in much of Dewey's work.
15. A.C. MacIntyre, "Against Utilitarianism," in *Aims in Education*, ed. T.H. Hollins (New York: Humanities Press, 1964), 21.
16. Passmore, "On Teaching to be Critical," 203.
17. "New School Censorship Report Reveals Alarming Trends," People for the American Way, *Bulletin* 2 (September 1992), 2,4.
18. Durham (N.C.) *Herald*, 20 May 1990 and 21 March 1992.
19. Cleveland Press, 9 April 1940. The town was Bradner, Ohio.
20. Boston Transcript, 21 February 1940.
21. See George S. Counts, *The American Road to Culture: A Social Interpretation of Education in the United States* (New York: John Day, 1930), 44-51. See also Harold Rugg, *That Men May Understand: An American in the Long Armistice* (New York: Doubleday, Doran and Co., 1941), 3-19.
22. Paul, *Critical Thinking*, 88, 92, 101-3.
23. *Ibid.*, 370.
24. *Ibid.*, 570.
25. *Ibid.*, 246.
26. *Ibid.*, 248.
27. *Ibid.*, 9-14. John Passmore makes a similar point in another context: "In no society, certainly, is rational, critical inquiry the dominant social force; in every society, it meets with opposition." Passmore, "On Teaching to be Critical," 199.
28. Paul, *Critical Thinking*, 105.
29. See, in this connection. R.S. Peters, *Ethics and Education*, 2nd ed. (London: George Allen & Unwin, 1970), 298-99. Also, Israel Scheffler, *Reason and Teaching* (New York: Bobbs-Merrill, 1973), 142-43.
30. Amy Gutmann, *Democratic Education* (Princeton: Princeton University Press, 1987), 44-45.
31. *Ibid.*, 45.
32. Margaret O'Brien Steinfels, "Children's Rights, Parental Rights, Family Privacy, and Family Autonomy," in *Who Speaks for the Child: The Problems of Proxy Consent*, ed. Willard Gaylin and Ruth Macklin (New York: Plenum Press, 1982), 242.
33. Francis Schrag, "The Right to Educate," *School Review* 79 (May 1971): 363-66.

34. *Wisconsin v. Yoder*, 92 S. CT. 1326 (1972). The Supreme Court found in favor of the right of Amish parents to terminate their children's public school education upon completion of the eighth grade.
35. Amy Gutmann, *Democratic Education*, 14 and chap. 1.
36. Schrag, "The Right to Educate," 372-73.
37. *Ibid.*, 373-74.
38. Amy Gutmann, "Children, Paternalism, and Education: A Liberal Argument," *Philosophy and Public Affairs* 9 (Summer 1980): 349-50.
39. Bertram Bandman, "Is There a Right to an Education?" in *Philosophy of Education 1977* (Normal, Ill: Philosophy of Education Society, 1977), 287-97.