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IV. EDUCATION AND PARENTAL RESPONSIBILITY

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I. THE BIBLICAL POSITION

The Parental Responsibility for Education

There is probably no more important duty than that of the education of our children. The future success of the Kingdom of our Lord is, to a great extent, dependent upon the successful education of covenant children in the knowledge of our Lord and in

44 Roland Barnes, *PCA Messenger* (October, 1984), p. 5.

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a biblically consistent world and life view. The following quote from Robert Lewis Dabney is particularly pertinent in this regard:

Seeing the parental relation is what the Scripture describes it, and seeing Satan has perverted it since the fall for the diffusion and multiplication of depravity and eternal death, the education of children for God is the most important business done on earth. It is the one business for which the earth exists. To it all politics, all war, all literature, all money-making, ought to be subordinated; and every parent especially ought to feel, every hour of the day, that, next to making his own calling and election sure, this is the end for which he is kept alive by God — this is his task on earth. On the right training of the generation now arising, turns not only the individual salvation of each member in it, not only the religious hope of the age which is approaching, but the fate of all future generations in a large degree.⁴⁵

The duty of education is (from the biblical perspective) a parental duty. According to Scripture, children are a gift from the Almighty God and thus are a sacred trust. Therefore, the Lord requires that parents provide all that their children need! Parents are required to feed, clothe, house and protect their children and prepare them for adulthood. Dr. Norman Harper states this very clearly in his book *Making Disciples, The Challenge of Christian Education at the End of the Twentieth Century*:

The authority and responsibility of the training of children is delegated primarily to the parents. It was to the parent that the command was given: “...provoke not your children to wrath: but bring them up in the nurture and admonition of the Lord” (Ephesians 6:4, KJV).⁴⁶

The duty of education is therefore a family responsibility. The family is the fundamental unit of society under God, and it is the duty of parents as led by the father to prepare their children to function righteously under God’s rule in all spheres of life (Genesis 1:26-28; 2:18-25; 18:19; Psalm 127:3-5; Ephesians 6:1-4).

In order for this task to be successful, education must be distinctively Christian; i.e., based upon God’s revelation of His Truth in His Word (Psalm 36:9; Exodus 20:16; John 17:17; John 14:6; John 8:32). Education is a necessary task for equipping children to glorify God in work and worship that is according to His Word. Thus, Christian education is necessary and essential for a godly use of talents (Psalm 78:1-8).

This responsibility cannot be abdicated by parents, for God holds them accountable. Parents may delegate this responsibility to surrogate parents who meet biblical qualifications while retaining the responsibility of education and the authority over their children.

The modern concept of children belonging to the state is anti-Christian. The responsibility for educating children does not belong to the state and therefore the state should not usurp this responsibility from parents. Robert Lewis Dabney comments very lucidly on whose responsibility the education of children is:

45 Robert Lewis Dabney, *Discussions of Robert Lewis Dabney*, vol. 1, p. 691 (1982).

46 Norman Harper, *Making Disciples, The Challenge of Christian Education at the End of the Twentieth Century*, p. 46 (1981).

Is the direction of the education of children either a civic or an ecclesiastical function? Is it not properly a domestic and parental function? First, we read in holy writ that God ordained the family by the union of one woman to one man, in one flesh, for life, for the declared end of “seeking a godly seed.” Does not this imply that he looks to parents, in whom the family is founded, as the responsible agents of this result? He has also in the fifth Commandment connected the child proximately, not with either presbyter or magistrate, but with the parents, which, of course, confers on them the adequate and the prior authority. This argument appears again in the very order of the historical genesis of the family and State, as well as of the visible Church. The family was first. Parents at the outset were the only social heads existing. The right rearing of children by them was in order to the right creation of the other two institutes. It thus appears that naturally the parents’ authority over their children could not have come by deputation from either State or visible Church, any more than the water in a fountain by derivation from its reservoir below.⁴⁷

The state is assigned a ministry of the sword in the execution of justice against evildoers (Romans 13:1-4). The state is not assigned the duty of educating our children. It is highly questionable whether it is wise for Christian parents to send their covenant children to a school system operated by the state which is openly or otherwise hostile to the Christian faith. It is inconceivable that Abraham would have sent Isaac to the Canaanites to learn about the world God had created. Christian parents who send their covenant children to state schools to learn about God’s world (science, etc.) and God’s activities (history, etc.) should seriously consider whether it is possible to equip their children to function responsibly in this world under God according to His Truth when their children are subject to prolific falsehoods and open hostility (Psalm 1:1-3; Exodus 34:12-16), whether it is possible to send their children to public schools (which are to a great extent dominated by Humanism) and at the same time fulfill their duty to rear their children in the nurture and admonition of the Lord (Ephesians 6:1-4).

Some educators believe that covenant children must not be shaped by a non-Christian religious educational institution:

The choice is between a Christian religious education and a non-Christian religious education. If this is true, there are no material circumstances that can justify a Christian parent in giving his child an education that is man-centered and thus dishonoring to God. Would you send your child to a Buddhist shrine to worship because it was nearer your home or because it was already paid for by the state? Of course not! Then we can say with equal certainty that we cannot send our children, in the most formative years of their lives, to be shaped religiously by a non-Christian religious educational institution.⁴⁸

But others are convinced that Christian teachers can have a godly influence in the public schools and that many public school teachers and administrators are not hostile to a Christian world view.

The ideal situation would be for Christian parents to have their covenant children educated in a thoroughly Christian atmosphere. Such an atmosphere would

47 Robert Lewis Dabney, *Discussions of Robert Lewis Dabney*, vol. 3, pp. 290-91 (1982).

48 Norman Harper, *Making Disciples, The Challenge of Christian Education at the End of the Twentieth Century*, p. 75 (1981).

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certainly include a thoroughly Christian curriculum which recognizes all truth as God's truth and teaches nothing as true in subject matter contrary to God's revealed word. It would also include Christian teachers who love God and seek to convey God's truth as well as demonstrate a concern for the spiritual well-being of their students. It would as well be an atmosphere in which the Scriptures are regularly consulted and prayer is regularly offered.

This ideal atmosphere would ordinarily be the Christian parents' first choice for the education of their covenant children.

However, it is recognized that Christian parents do choose other means of educating their children for a variety of reasons.

If state or public education is decided upon by the parent, the parent must determine that the content of subject matter being taught in the public school is Scripturally appropriate. The church should educate and inform the parent of general problems in the public school curriculum (as the teaching of Humanistic, anti-Christian values in moral and sex education and the omission of facts about the history, existence, role and contributions of Christianity in the United States and the world from the history and social studies textbooks). Then the parent can protect his child by special instruction or by asking that his child be excused from certain parts of the curricula.

A parent with children in public school (and many private schools which use the same textbooks) should be careful to supplement in his home the Christian values and facts of history which are omitted from the public school curriculum. Where public school values contradict those of the Christian faith, the parent should instruct his children in Biblical values, pointing out to them the error of their public school textbook. For a parent to send a child to a public school, he must be very careful, well-informed and involved.

In addition, parents should study the content of their children's textbooks and then inform the church of their findings. Parents should be actively involved in the public school through the Parent Teacher Association or other such groups.

If the local public school does not provide an education compatible with Scriptural principles and the parent cannot change the public school curriculum by talking with his child's teachers, then it is improper for a Christian parent to permit his child to be taught ungodly principles, Deut. 6:5-9; 11:18-21. If public officials will not allow a child to be excused from a class or from part of the curriculum which contradicts and undermines a child's faith, the parent has no excuse for leaving his child in that school.

Churches and Presbyteries should consider how they might encourage parents in the task of providing their children with an education that is consistent with biblical Truth and that will prepare them for effective service for God's Kingdom in all spheres of life. Churches should seriously consider providing thoroughly Christian and biblical schools for their covenant children as well as many other children in their respective communities. If necessary, the church should assist in providing the means by which a parent can educate his child, whether it be through establishment of a Christian school or financial assistance to the parent to provide for a Christian or private education elsewhere.

Undoubtedly, many problems with respect to adolescent rebellion in covenant children can be partially attributed to the schizophrenic world view that is absorbed where church and family embrace a wholly different world view than that which is promoted in the public educational system.

The need for quality education in our modern, technological society is paramount for all of our young people. The public schools have failed to truly educate our children in two fundamental areas. First, they have often distorted reality by insisting on a radically secular and Humanistic world view. Second, they have often failed to provide the basic skills needed for a young person to become a productive member of society.

This is nowhere more evident than in our major cities where an enormous drop-out rate of often above one-third demonstrates the ineffectiveness of many school systems. This substandard education points toward the creation of a permanent underclass of functionally illiterate adults who will emerge alienated from a society which has not provided them with equal access to opportunities for the future.

Such a felt need provides the PCA with a unique opportunity in its strategic concern to evangelize the great metropolitan centers of North America. We have the opportunity open before us to truly penetrate the urban culture by providing quality Christian education at reasonable cost. Our suburban and exurban churches can establish a true bridge of friendship and understanding by becoming partners to the urban church, providing personal and financial resources for the nurturing of all of our children.

II. CONSTITUTIONAL ISSUES IN EDUCATION

The First Amendment to the Constitution states that Congress shall make no law prohibiting the free exercise of religion.

The Supreme Court of the United States has long upheld the right of parents to direct the upbringing and education of their children. In the case of *Pierce v. Society of Sisters*, 268 U.S. 510 (1925), the Court ruled that:

[The State may not] unreasonably interfere[] with the liberty of parents and guardians to direct the upbringing and education of children under their control.... The child is not the mere creature of the State; those who nurture him and direct his destiny have the right, coupled with the high duty, to recognize and prepare him for additional obligations.⁴⁹

In 1944, the Supreme Court also recognized the unique relationship between parents and children—a relationship which belongs exclusively to the parents and not to the State:

It is cardinal with us that the custody, care and nurture of the child will reside first in the parent, whose primary function and freedom include preparation or obligation that the State can neither supply or hinder.

Prince v. Massachusetts, 321 U.S. 158,166 (1944).

Again in 1968, the Court noted that “constitutional interpretation has consistently recognized that the parents’ claim to authority in their own household to direct the

⁴⁹ *Pierce v. Society of Sisters*, 268 U.S. 510, 534-35 (1925) (emphasis added). In this case, the State of Oregon had sought to eliminate the private school system and require all students to attend public schools. The Supreme Court has reaffirmed its commitment to the interest of parents in guiding the religious education of their children in *Wisconsin v. Yoder*, 406 U.S. 205, 232 (1972).

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rearing of their children is basic in the structure of our society.”⁵⁰ Similarly, in 1982, the Supreme Court upheld the “fundamental liberty interest of natural parents in the care, custody, and management of their child” against the State’s terminating that right even when the parents “have not been model parents or have lost temporary custody of their child to the State.” *Santosky v. Kramer*, 71 L.Ed.2d 599,606 (1982).⁵¹

However, social services departments; state, family and juvenile courts; and legislative and other judicial bodies have been more and more willing to interfere with the right of the parents to raise their children. The ostensible reason for removing children from the custody of their parents or ignoring the parental right to control the content of their children’s teaching is to protect the child from abuse by his parents. Increasingly, state agencies and courts have interpreted emotional and physical abuse to include the teaching of religious doctrines to children in Christian schools or at home.

A. Options for Christian Education:

1. Church Schools

Where parents have sought to control directly the content of their child’s education, they have been most successful where their child is in a private Christian school or where they are educating their child at home. As noted above, the United States Supreme Court, in 1925, in the case of *Pierce v. Society of Sisters*, ruled that a state may not prohibit private education. It specifically upheld the right of a Catholic order to establish a private denominational school.

In 1972 the Court upheld the right of Amish parents to withdraw their children from public school to protect their religious values:

This case involves the fundamental interest of parents, as contrasted with that of the State, to guide the religious future and education of their children. The history and culture of Western Civilization reflect a strong tradition of parental concern for the nurture and upbringing of their children. This primary role of the parents in the upbringing of their children is now established beyond debate as an enduring American tradition.

The Ohio Supreme Court in 1976 similarly ruled: “[I]t has long been recognized that the right of a parent to guide the education, including the religious education, of his or her children is indeed a ‘fundamental right.’” *State v. Whisner*, 41 Ohio St.2d 181, 213-14, 351 N.E.2d 750,769 (1976).

However, state departments of education and social services have attacked these forms of education as providing an inferior result, as was noted in the Faith Baptist Church case in Louisville, Nebraska, recently. A number of courts have upheld state departments of education.⁵²

50 Ginsberg v. New York, 390 U.S. 629,630 0968), quoted in H. L. V. Matheson, 450 U.S. 398,410 1981).

51 “Even when blood relationships are strained, parents retain a vital interest in preventing the irretrievable destruction of their family life. If anything, persons faced with forced dissolution of their parental right have a more critical need for their procedural protections than do those resisting State intervention into ongoing family affairs. When the State moves to destroy weakened familial bonds, it must provide the parents with fundamentally fair, perfect procedures.” *Santosky v. Kramer*, 71 L.Ed.2d 599,606 1982). The Court here protected parental rights under the due process clause of the Fourteenth Amendment.

52 In *Braintree Baptist Temple v. Holbrook Public Schools*, 616 F. Supp. 81 (D. Mass. 1984), a federal district court rejected the argument that the state has no right to regulate private schools.

However, in response to legislative efforts by Christian educators, pastors and parents, a number of states have protected the right of churches to establish their own Christian school independent of state control.⁵³ In other situations federal and state courts have found that the First Amendment right of free exercise of religion guarantees to parents their right to instruct their children in a Christian school, even though that Christian school or church school does not meet the requirements of the state department of education or a private school.⁵⁴

Because the cost of church and Christian school education is often out of reach of many parents, churches and presbyteries should consider the support of Christian education. One means of financing available in some states (as Minnesota) is the voucher system.

2. Home Schools

In an increasing number of states, legislatures have acted to protect the right of parents to educate their children at home.⁵⁵ In other states, state courts have protected the right of parents to educate their children at home, even overturning compulsory education laws which apparently prohibit home education as unconstitutional.⁵⁶ State Supreme Court decisions in Illinois, Iowa, Michigan, Oregon, Virginia, and West Virginia, however, indicate hostility toward home schooling.⁵⁷

According to the court, permissible regulations include minimal hours of instruction, teacher qualifications and coverage of certain prescribed subjects. This decision will add to the difficulties of parents who are conscientiously opposed to any government regulation of their children's education. See also *Pruessner v. Burton*, 368 N.W.2d 74 (Iowa 1985) cert. den. 54 U.S.L.W. 3411 (Dec. 11, 1985) (No. 85-671).

53 Such was a resolution of the conflict between Christian schools and the State of Nebraska. States that permit church schools to function without state-certified teachers or licensing control are: Alabama, Arizona, Louisiana, Maine, Mississippi, and North Carolina. Tennessee, West Virginia and Florida allow church schools if the school is under the oversight of a state Christian school organization. Nebraska and Vermont require periodic testing of the children for them to remain in the church school. Other states require a church school to meet the state requirements for certification of teachers and even of the school itself. Iowa and Michigan are currently the most hostile to church schools. Additional information on the laws in the various states on church schools can be obtained from the Education Commission of the States, 1860 Lincoln Street, Suite 300, Denver, Colorado 80295, in their publication *Compulsory Education Laws and the Impact on Public and Private Education*, by Patricia M. Lines, copyright 1985.

54 See *Bangor Baptist Church v. Maine*, 576 F. Supp. 1299 (1983). *State v. Whisner*, 47 Ohio St.2d 181, 213-M, 351 N.E.2d 750, 769 (1976), recognizing "that the right of a parent to guide the education, including the religious education, of his or her children is indeed a 'fundamental right.'"

55 Included in this list are Arizona, Arkansas, Colorado, Florida, Georgia, Louisiana, Mississippi, Montana, New Mexico, Nevada, Ohio, Oregon, Rhode Island, Tennessee, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming. Seventeen states require home schools to be approved by the local school district or school board: Arkansas, Colorado, Connecticut, Delaware, Hawaii, Idaho, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, North Dakota, Ohio, Pennsylvania, Rhode Island, South Carolina, and Vermont.

However, Iowa, Michigan and North Dakota require all schools, including home schools to have a certified teacher involved in some degree in the instruction.

Additional information on the home school laws in the fifty states is available from the Home School Legal Defense Association, Post Office Box 2091, Washington, D.C. 20013 and from The Rutherford Institute, Post Office Box 510, Manassas, Virginia 22110.

56 North Carolina, Minnesota, Missouri, and Iowa (in part).

57 *Scoma v. Chicago Board of Education*, 391 F. Supp. 452 (M.D. Ill. 1974); *State v. Moorehead*, 308 N.W.2d 60 (Iowa 1981); *Shanson v. Kushman*, 490 F. Supp. 109 (W.D. Mich. 1980); *State v. Bowman*,

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406 U.S. 205 0972), upheld the right of Amish parents to withdraw their children from public school in order to provide alternative education where “such public education ‘substantially interfere[d]’ with the religious development of the Amish child and his integration into the way of life of the Amish Faith Community.” However, there has been no definitive Supreme Court case upholding the right of private religious education either in church school or at home. The Supreme Court recently declined to review the case of *Dvaro v. District Attorney*, 712 F.2d 96 (4th Cir. 1983), *cert. den.* 104 S.Ct. 998 (1984).

B. Problems With Public Education

The First Amendment as passed by the First Congress in 1789 provides: “Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof....” Fifty-eight days prior to Congress¹ adopting this Amendment, it appropriated government land for public schools in the Northwest Territories with the proviso:

Religion, morality and knowledge, being necessary to good government and the happiness of mankind, schools and the means of education shall forever be encouraged.⁵⁸

Separation of church and state was originally understood to *prevent the federal government* from interfering with the free exercise of religion by individuals and churches. The First Amendment was also passed to prohibit establishment of a national church, although not to interfere with state-established churches, for six of the states still had established churches at the time. One scholar noted that there is no historical evidence that the First Amendment was intended to preclude federal government aid to religion when it is provided on a nondiscriminatory basis.⁵⁹

The words “separation of church and state” are not found in the 1787 Constitution or the 1789 Bill of Rights. This phrase was not used until 1803 by Thomas Jefferson in a letter to Danbury Baptist Association and was not recognized as a significant constitutional idea by the Supreme Court until 1878.

The idea that the church and religious activities should be kept out of the public sphere did not gain legal support until 1947 when the Supreme Court ruled that the establishment clause meant that “[n]either a state nor the Federal government...can pass laws which aid one religion, aid all religions, or prefer one religion over another.”⁶⁰ This interpretation was applied to prohibit public school prayer and Bible reading in 1962 and 1963, the posting of the Ten Commandments in 1980, and even silent prayer in 1985.⁶¹ Teaching of evolution was protected.⁶² However, the Court has thus far refused

60 Ore. App. 184,653 P.2d 254 0982); *Grigg v. Virginia*, 297 S.E.2d 799 (Va. 1982); and *State v. Riddle*, 285 S.E.2d 359 (W. Va. 1981).

In some states, parents must bring their home school under the sponsorship of a church in order to avoid violation of compulsory education laws.

58 Northwest Ordinance, article III, 1 Stat. 52 (August 7, 1789).

59 Robert L. Cord, *Separation of Church and State: Historical Fact and Current Fiction*, p. 15 (1982).

60 *Everson v. Board of Education*, 330 U.S. 1,15 (1947).

61 *Engel v. Vitale*, 370 U.S. 421 0962); *Abington School District v. Schempp*, 374 U.S. 203 1963); *Stone v. Graham*, 449 U.S. 39 (1980); and *Wallace v. Jaffree*, 105 S.Ct. 2479 1985).

to review cases which challenged the teaching of Humanism in values and sex education which conflicted with the theistic beliefs of children and parents.⁶³

A District Court Judge in the recent case of *Jaffree v. James*, 544 F. Supp. 727 (1982), however, recognized the discrimination of the public schools against the Christian religion:

It is common knowledge that miscellaneous doctrines such as evolution, socialism, communism, secularism, humanism, and other concepts are advanced in the public schools. Teachers adhering to such tenets [sic] are more likely to expose their students to these ideas. *Reading, teaching or advancing Biblical principles*, however, is strictly prohibited. It is time to recognize that the constitutional definition of religion encompasses more than Christianity and prohibits as well the *establishment of a secular religion*.⁶⁴

Additionally, a new study performed for the National Institute of Education as an official government study demonstrates the practice of excluding theistic religions from the textbooks in the Nation's public schools.⁶⁵

For example, in its review of the social studies textbooks in grades 1 through 4, the study noted that:

[N]ot one of the forty books in the study had one word of text that referred to any religious activity representative of contemporary American life. That is no text referred to any present day American who prayed, or participated in worship or in any other way represented active religious life.⁶⁶

The author adds:

[T]his...strongly suggests the psychological interpretation of the motivation behind the *obvious censorship of religion* present in these books. Very briefly those responsible for these books appear to have the *deep-seated fear of any form of active contemporary Christianity*, especially serious, committed Protestantism. This fear has lead the authors to deny and repress the importance of this kind of religion in American life.⁶⁷

In reviewing social studies' texts in grades 1 through 6, the study concluded that "there was not one word or image in all the social studies books ... that referred in any way to the powerful and active world of contemporary American Protestantism."⁶⁸ The

62 *Epperson v. Arkansas*, 393 U.S. 97 (1968). *McLean v. Arkansas Board of Education*, 429 F. Supp. 1255 (1982) also struck down an Arkansas statute where the state legislature sought to present a balanced treatment of scientific evidence for evolution and creation.

63 *Grove v. Mead School District*, 753 F.2d 1528 (1985), 106 S.Ct 85 (1985); *Smith v. Ricci*, 446 A.2d 501 (1981) *appeal dismissed*. 459 U.S. 962 (1982).

64 *Jaffree v. James*, 544 F. Supp 727, 732 (1982) (emphasis added). The Court noted that "[t]he religions of atheism, materialism, agnosticism, communism and socialism have escaped the scrutiny of the courts throughout the years... it is apparent from a reading of the decision law that the courts acknowledge that Christianity is the religion to be proscribed." *Id.* This decision was overturned on appeal on another issue, so it has no precedential value. Nonetheless, the judge's reasoning is certainly worthy of note.

65 National Institute of Education, *Equity Values Education: Do the Values Education Aspects of the Public School Curricula Deal Fairly With Diverse Belief Systems?* (1985). Dr. Paul Vitz' report is available from Servant Books under the title *Censorship: Evidence of Bias in Our Children's Books*.

66 *Ibid.*, Section 1, Part 2, i (emphasis added).

67 *Ibid.*, Section 1, Part 2,13 (emphasis added).

68 *Ibid.*, Section 1, Part 2, iii.

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study of eleventh and twelfth grade history books, noted that “[t]here was not one book that recognized the many evangelical movements through U.S. history since the colonial period.”⁶⁹

The study also found that of 670 stories and articles from widely-used grade three and six readers, “[n]ot one story or article in these books [used to teach reading] had a religious or spiritual theme as central to it.”⁷⁰

It concludes:

These basic readers are so written as to represent a systematic *denial of the history, heritage, beliefs and values* of a very large segment of the American people.⁷¹

In certain limited situations, the Supreme Court has ruled that public education may interfere with the basic religious tenets in practice of a religious community. In *Wisconsin v. Yoder*, 406 U.S. 205, 217-18 (1972), noted above, the Supreme Court held:

The conclusion is inescapable that secondary schooling, by exposing Amish children to worldly influences in terms of attitudes, goals and values contrary to beliefs, and by substantially interfering with the religious development of the Amish child and his integration into the way of life of the Amish Faith Community at the critical adolescent stage of development, contravenes the basic religious tenets and practice of the Amish faith, both as to the parent and the child.

The Supreme Court has ruled that such interference was a violation of the parents' and children's free exercise of religion under the First Amendment of the Constitution. In the same case the Supreme Court noted:

A state's interest in universal education, however highly we rank it, is not totally free from a balancing process when it infringes on fundamental rights and interests, such as those specifically protected by the Free Exercise Clause of the First Amendment and the *traditional interest of parents with respect to the religious upbringing of their children*.

Wisconsin v. Yoder, 406 U.S. 205, 214 (1972) (emphasis added).

Yet, state and federal courts have almost uniformly overlooked their obligation to protect against attacks of Christian beliefs and censorship of Christian history, contributions and role while the same textbooks and teacher materials advance that of other religions and philosophies. It is imperative that Christian people pray to God and petition school authorities for equal protection of their ideas, history and activities in public schools.⁷²

69 Ibid., Section 1, Part 2,55 (emphasis added).

70 Ibid., Section 1, Part 2, v.

71 Ibid., Section I, Part 2,71 (emphasis added).

72 Under the neutrality doctrine imposed on American public schools by the decision in *Wallace v. Jaffree*, 105 S.Cu 2479 (1985), teachers and textbooks cannot advance religious “beliefs,” although they may teach the existence, contributions, role, and history of religion. This fact is being pressed by 624 teachers, students and parents in the follow-up case of *Smith v. Board of School Commissioners of Mobile County* in federal district court in Alabama. These plaintiffs are arguing that Humanism may not be advanced as a religion in textbooks and that the existence, contributions, role and history of Christianity may not be excluded from textbooks and teacher materials.

The Protection of Pupil Rights Act, 20 U.S.C. 1232h (1978), was enacted to protect children from psychological examination or treatment which requires the pupil to reveal information concerning "political affiliations," "sex behavior and attitudes," "mental and psychological problems potentially embarrassing to the student or his family," or critical appraisals "of behavior and attitudes with family members" without "the prior written consent of the parent."⁷³

However, if the offensive material is not a psychological examination or treatment, but a public school textbook or teaching method, then the parent must rely upon the willingness of the public school teacher or principal to make an exception for his child and to excuse him from exposure from the material as a federal district court recently held in *Mozert v. Hawkins County Public Schools*, F.Supp. (E.D. Tenn. Oct. 24, 1986). If the school authorities do not permit the child to be excused, then the parents' next recourse is to appeal to the board of education of that city or county or to the courts, as parents did recently in the case of *Grove v. Mead School District*, 753 F.2d 1528 (9th Cir. 1985). In this case, however, the Ninth Circuit held that the Constitution does not protect individuals from being religiously offended by what the government does, even though the Court acknowledged that offensive material "generally denigrates the figure of Jesus and casts doubt upon much fundamentalist doctrine—from the efficacy of prayer to the inerrancy of Scripture and benevolence of God." *Id.* at 1541. On appeal, the Supreme Court denied *certiorari* and refused to review the lower court decision.⁷⁴ Some believe that because of the hostility of public schools to theistic ideas, Christian parents should remove their children from the public school system. Psalms 1:2-3.

A favorable Supreme Court decision to protect the beliefs of Christian children in public schools is greatly needed. Prayer and financial support should be directed to cases as *Mozert*, referred to above, and to the case of *Smith v. Board of School Commissioners of Mobile County*, successor to the *Jaffree* case. Here 624 parents, teachers and students are asking Judge Brevard Hand to prohibit the establishment of Humanistic moral values in the public school curriculum and to protect their children against the censorship of textbooks as to the existence, history, role and contributions of Christianity.⁷⁵

73 See *Child Abuse in the Classroom* (Crossway Books: 1984) for the transcript of hearings on current abuses in the classroom and regulations to implement this law.

74 *Grove v. Mead School District*, No. 354,753 F.2d 1528 (1985) cert. den. 106 S.Ct. 85 0985). The Sixth Circuit Court of Appeals, however, took a somewhat contrary position when it held that exposure to offensive religious beliefs through an elementary school reading program may in fact constitute a violation of the students' or parents' free exercise of religion in *Mozert v. Hawkins County Public School*, 763 F.2d 75 (6th Cir. 1985).

75 Nearly all Humanists agree on the following principles:

- a. God is either nonexistent or irrelevant to modern man.
- b. Man is the supreme value in the universe.
- c. Man is purely a material or biological creature.
- d. Man, through the use of his scientific reason, will save himself.

The *Smith* case has received substantial support from PCA churches. Two of the lead attorneys are PCA elders; four of the witnesses are Presbyterian pastors or seminary professors; and the lead Plaintiff is a member and deacon of a PCA church. Eastwood Presbyterian Church in Montgomery, Alabama, and Briarwood Presbyterian Church in Birmingham, Alabama, have been channeling gifts for the effort.

An example of the anti-Christian teachings of two of the textbooks reviewed in the *Smith* case is:

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The last alternative for a Christian parent is to instruct his child to refuse to study the materials which undermine the child's faith and morals regardless of the consequences to the child's grades or to withdraw the child from the public school and to enroll him in a Christian school or home school discussed above. If a parent cannot afford this option, the church is responsible to help a parent obey God (Acts 2:45).

CONCLUSION

Scripture clearly requires that Christian parents train their children to know and follow God (Deuteronomy 6:6-9, Proverbs 22:6, Ephesians 6:3-4). The parent is personally responsible for this, although he may ask others to help him, as the church (Ezra 10:1). However, a parent should not ask an individual to teach his children where the parent does not have authority over the content of what is taught. A parent may control what a child is taught by supplementing classroom or textbook materials or by removing his child from the classroom when the materials are so hostile or damaging that the parent does not believe that he can supplement and effectively neutralize their anti-Christian bias. Where a parent allows an individual to teach ungodly or unbiblical ideas to his child, he violates Scripture (Proverbs 1:8-33, Isaiah 8:16-20). Thus, a parent must determine how he can best follow God in educating his children. The choices before him are home schools, church schools, private independent schools or state schools. Parents must choose the educational system that will best enable them to fulfill their duty before God. Churches and presbyteries should consider supporting Christian and home schools (where parents cannot afford these alternatives) and efforts to end the hostility toward the Christian faith and the censorship of Christianity's existence, contributions and history from public school textbooks.

"There are several things you should not do when telling children about death.... Do not say, 'God took Daddy away because he wants Daddy to be with him in heaven.' Not only is this confusing, but it causes the child to fear and hate God for taking the father away....

"The simplest way to talk to a child about death is to talk about how flowers and pets die. If you explain that death is a normal part of life, the child will be able to accept it" *Contemporary Living* by Verdene Ryder, The Goodhart-Wilcox Co., Inc. at page 329.

Another example:

"Too strict a conscience may make you afraid to try new ventures and meet new people. It may make you feel different and unpopular. None of these feelings belongs to a healthy personality.

"You can learn about yourself when you listen to your conscience. It is you talking to yourself, guiding you." *Today's Teen* by Joan Kelly and Eddy Eubanks, Charles A. Bennett Co., Inc. at page 23.