



# How to Get Biblically Aligned Books In Public Schools



PACIFIC JUSTICE  
INSTITUTE

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# **An Open Letter to Parents, Teachers, Administrators, and School Boards**

Pacific Justice Institute is dedicated to protecting religious freedom, parental rights, and other civil liberties. Since our organization's founding in 1997, we have assisted thousands of parents, students, teachers, and school administrators with a wide range of issues involving civil rights in public education.

As someone concerned with the public school system, you may know that many public school libraries contain books and materials contrary to Christian beliefs. We know many of you have engaged in actions to have these books removed. But removing books is not the end of our duty. We need to ensure that our public school libraries offer books and materials supporting the Christian faith and ones that do not violate Biblical principles. This resource is designed to enable you not just to seek to remove books and materials from the library but to successfully add books to your school library for the edification of our children.

If you have any questions about the information in this booklet or would like legal assistance, please do not hesitate to contact the Pacific Justice Institute at (916) 857-6900.

Running the race,



Brad Dacus  
President & Founder

# REQUESTING THE ADDITION OF BOOKS TO YOUR SCHOOL'S LIBRARY

Nothing in the First Amendment converts public schools into religion-free zones or requires students, teachers, or other school officials to leave their private religious expression behind at the schoolhouse door. The line between government-sponsored and privately initiated religious expression is vital to properly understanding what the First Amendment's Religion and Free Speech Clauses prohibit and protect.<sup>1</sup>

Although a government may not promote or favor religion or coerce students' consciences, schools may not discriminate against private religious expression by students, teachers, or other employees. Schools must also maintain neutrality among faiths rather than preferring one or more religions over others.<sup>2</sup>

The U.S. Supreme Court has confirmed that schools must guarantee "neutrality is respected, not offended, when the Government, following neutral criteria and even handed policies, extends benefits to recipients whose ideologies and viewpoints, including religious ones, are broad and diverse."<sup>3</sup> The Court rejected the claim that because the students were elementary school children, the school had a higher duty to protect impressionable young children from a perceived

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<sup>1</sup> USDOE Guidance on Constitutionally Protected Prayer and Religious Expression in Public Elementary and Secondary Schools, May 15, 2023, [https://www2.ed.gov/policy/gen/guid/religionandschools/prayer\\_guidance.html#\\_ednref5](https://www2.ed.gov/policy/gen/guid/religionandschools/prayer_guidance.html#_ednref5), See also *Kennedy v. Bremerton Sch. Dist.*, 142 S. Ct. 2407, 2423–24 (2022) (making the point with respect to the Free Speech Clause); see also *Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 302 (2000) ("there is a crucial difference between government speech endorsing religion, which the Establishment Clause forbids, and private speech endorsing religion, which the Free Speech and Free Exercise Clauses protect" (quoting *Bd. of Educ. v. Mergens*, 496 U.S. 226, 250 (1990) (plurality op.))); accord *Rosenberger v. Rector & Visitors of Univ. of Va.*, 515 U.S. 819, 841 (1995).

<sup>2</sup> *Id.*, referencing *Larson v. Valente*, 456 U.S. 228 (1982); *Epperson v. Arkansas*, 393 U.S. 97 (1968).

<sup>3</sup> *Good News Club v. Milford Cent. Sch.*, 533 U.S. 98, 103 (2001).

government endorsement of religion.<sup>4</sup> The Court found that the danger of students misperceiving the religious event as one the school sponsored was no greater threat than students perceiving religious hostility if the school did not allow the event.

Many school administrators fear that allowing Biblically aligned books and materials in public school libraries violates the legal doctrine of “separation of church and state.” In contemporary society, there is a great deal of confusion about this phrase’s meaning and legal authority.

Contrary to popular belief, the U.S. Supreme Court has never insisted on an impenetrable wall between church and state.<sup>5</sup> Indeed, the Court has never considered it possible or desirable to enforce a government regime of total separation to comply with the First Amendment’s Establishment Clause.<sup>6</sup> Moreover, the “[wall of separation] metaphor . . . is not a wholly accurate description of the practical aspects of the relationship that, in fact, exists between church and state.”<sup>7</sup>

As a matter of law, the Constitution “affirmatively mandates accommodation, not merely tolerance, of all religions, and forbids hostility toward any.”<sup>8</sup> Therefore, prohibiting the existence of Biblically aligned books or materials in a public school library based on a fear of violating the separation of church and state is clearly mislaid.

Indeed, prohibiting said books or materials when all other types of books and materials are allowed in public libraries violates the separation of church and state. We believe such a prohibition necessarily amounts to an unconstitutional act of state-sponsored hostility toward religion.

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<sup>4</sup> Id. at 114.

<sup>5</sup> *Lemon v. Kurtzman*, 403 U.S. 602, 614 (1971).

<sup>6</sup> *Committee for Public Education & Religious Liberty v. Nyquist*, 413 U.S. 756, 760 (1973).

<sup>7</sup> *Lynch v. Donnelly*, 456 U.S. 668, 673 (1984).

<sup>8</sup> Id. (internal citations omitted) (emphasis added).

School administrators can only exercise control over books or materials in the library if their actions are reasonably related to legitimate pedagogical concerns.<sup>9</sup> This means that a school administrator can only prohibit a library book or material based on an assertion that it has no valid educational purpose. Any other purpose implicates the First Amendment and students' rights under the U.S. Constitution.<sup>10</sup>

Equal protection prohibits public schools from discriminating against religious expression. Students or parents can seek to add religious books or materials to a school library in the same manner and to the same extent that they are permitted to add secular books or materials. It is constitutional for a public school to have Biblically aligned books and materials in the library when there is a secular purpose for the books or materials.

## **HOW TO GET BIBLICALLY ALIGNED BOOKS IN YOUR PUBLIC SCHOOL LIBRARY**

1. Go to your school district's website and determine if your school has written a policy for selecting library books and materials.
2. If your school has such a policy, it likely provides information including:
  - a. Objectives in selecting the books and materials;
  - b. Responsibilities in selecting the books and materials;
  - c. Criteria for the selection of books and materials; and
  - d. Procedures for selection.
3. The Policy may also indicate that your school has a committee appointed by the Chief School Administrator, which is advisory

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<sup>9</sup> Hazelwood Sch. Dist. v. Kuhlmeier, 484 U.S. 260, 273 (1988).

<sup>10</sup> Id.

in recommending books for selection to the library to the Board of Education for their approval.

4. Identify the particular book(s) or material(s) you would like your school library to offer to students.
5. Submit a written request to your Chief School Administrator with a copy to the Committee and library media specialist stating your request that a copy of the identified book(s) or material(s) be purchased and offered as a resource in your school's library.



# PROPOSED LETTER

Here is a proposed form for the letter:

Dear (Chief School Administrator),

We have read our school's policy on selecting books and materials for our school library. We are pleased to know that our library's primary objective is to implement, enrich, and support the school's educational programs. We are also encouraged to learn that the library seeks to fulfill its duty to provide a wide range of materials on all difficulty levels, with diversity of appeal and the presentation of different points of view.

In support of those goals, we are requesting that (title of the book(s) or material(s)) be approved for purchase as a resource to be offered to our students from our school library.

We recognize that the book we request to purchase has a strong religious component. However, we are confident that the district knows that equal protection under the law prohibits public schools from discriminating against religious expression. Students or parents can seek to add religious books or materials to a school library in the same manner and to the same extent that they are permitted to add secular books or materials. It is constitutional for a public school to have Biblically aligned books and materials in the library when there is a secular purpose for the books or materials.

These books will stimulate growth in factual knowledge, literary appreciation, and aesthetic values on ethical standards. They will provide information enabling pupils to make intelligent judgments daily. The books will assist our students in developing the practice of critical analysis of all media under their guidance and ensure that students place principle above personal opinion and reason above prejudice. These materials ensure our library contains a

comprehensive collection appropriate for the users of the library media center.

Thank you for considering our request. Please let us know what further steps we need to take to approve it. We look forward to hearing from you that our library will offer these books soon!

Kind regards,

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Parents' Names

cc: School Board President  
Library Media Specialist  
Committee for Library Materials Selection



# RECOMMENDED LIST OF BOOKS

As an additional resource, here is a list of books that you may want to request your school library offer:

## **Grade Level: 9-12**

A Bump in Life by Amy Ford

A Change of Affection: A Gay Man's Incredible Story of Redemption by Becket Cook

A Transgender's Faith by Walt Heyer

Born Again This Way by Rachel Gilson

Courageous: Students Abolishing Abortion in this Lifetime by Kristan Hawkins

Detrans: True Stories of Escaping the Gender Ideology Cult by Mary Margaret Olohan

Disciplines of a Godly Woman by Barbara Hughes

Disciplines of a Godly Young Man by R. Kent Hughes and Carey Hughes

Gay Girl Good God by Jackie Hill Perry

God and the Transgender Debate: What Does the Bible Actually Say about Gender Identity? by Andrew T. Walker

Irreversible Damage: The Transgender Craze Seducing Our Daughters by Abigail Shrier

Kid Dakota and the Secret at Grandma's House by Walt Heyer

Lies Men Believe by Robert Wolgemuth

Lies Young Women Believe by Nancy DeMoss Wolgemuth

Living in a Gray World by Preston Sprinkle

Male & Female: A Biblical Look at Gender by Renée Webb Sproles

NIV Bible by Zondervan

Pro-Life Answers to Pro-Choice Arguments by Randy Alcorn

Stand for Life: A Student's Guide for Making the Case and Saving Lives by John Ensor

The Case for Life: Equipping Christians to Engage the Culture by Scott Klusendorf

The Detransition Diaries by Jennifer Lahl

The Genesis of Gender: A Christian Theory by Abigail Favale

The Jesus I Wish I Knew in Highschool by by Cameron Cole and Charlotte Getz

Transgender to Transformed: A Story of Transition That Will Truly Set You Free by Laura Perry

Why Pro-Life?: Caring for the Unborn and Their Mothers by Randy Alcorn

## **Grade Level: 6-8**

Anxious for Nothing: Finding Calm in a Chaotic World by Max Lucado

Defined - Teen Girls' Bible Study Book: Who God Says You Are by Priscilla Shirer

Defined: Who God Says You Are - Younger Kids Activity Book: A Study on Identity for Kids by Stephen Kendrick

Important Things Every Kid Should Know to Survive Middle School by Sandy Silverthorne

Lies Girls Believe: And the Truth that Sets Them Free by Dannah Gresh

Living in a Gray World: A Christian Teen's Guide to Understanding Homosexuality by Preston Sprinkle

Scientists of Faith by Christy Monson

The Action Bible by Sergio Cariello

The Prince Warriors by Priscilla Shirer and Gina Detwiler

The Shadow and the Promise by Marty Machowski

The Songs of a Warrior by Katy Morgan

Tilly by Frank Peretti

Unmuzzel, Me Please! by Rogan O'Handley

Who Am I and Why Do I Matter? by Chris Morpew

## **Grade Level: K-5**

A Fish Out of Water: A Christian Perspective on Gender Identity by Linda Hutchins

Before I was me by Frank Fraser

Be the Boy or Girl God Made You to Be! by Layna Carlton

Crafted by God by Dr. Georgia Purdom and Stacia McKeever

Elephants Are Not Birds by Ashley St. Clair

Exploring the Earliest Gospel by Rebecca McLaughlin

God made all of Me by Justin S. Holcomb

God Made Boys and Girls: Helping Children Understand the Gift of Gender by Marty Machowski

God Was Not Confused When Creating You by Gabriela Garcia Sorto

It's Good to Be a Girl: A Celebration of All That God Made You to Be by Jen Oshman and Zoe Oshman

## **Grade Level: K-5 (Continued)**

Jesus and my Gender by Dale Partridge

Little lives matter by Elizabeth Johnston

Little Pilgrim Progress by Helen L. Taylor

Male & Female Created He Them by Jordon P Frye

Prolife Kids by Bethany Bomberger

The Jesus Storybook Bible by Sally Lloyd-Jones

The Story of You by Krystle Joy DeGraide

## **CONCLUSION**

We thank you for your time and attention to this booklet. If you have any questions or would like to request additional copies, please contact the Pacific Justice Institute. If you would like to inquire about legal advice or assistance with one of the issues discussed in this booklet, contact the Pacific Justice Institute's legal department for more information.

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**Website: [PJI.org](http://PJI.org)**

**Email: [info@pji.org](mailto:info@pji.org)**

**Phone: (916) 857-6900**

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