

Deconstructing Academic Writing

Continuing a Conversation on Christian Privilege

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The topic of privilege has been a staple of multicultural education over the last decade and a half, perhaps most famously explicated by McIntosh (1988). Privilege may be an active mindset of intentional devaluation of other worldviews, but it exists most perniciously as a sort of inertia of perceptions, most often analogized as the water within which a fish swims, the fish being unaware that the water is even there because of its very omnipresence. It consists of unquestioned assumptions and unasked questions, of things that ‘everyone knows’ and upon which ‘everyone’ is presumed to agree.

This establishes a hegemonic discourse that causes many voices to be shut out of full participation in the cultural conversation, as the norms of discourse do not include their perspective and standpoint (Hardiman & Jackson, 1997; Young, 1990, 2002). The privileged assume their own standards as universal and their self-agency as individual, which enables their denial of individual agency (replaced with stereotyping and group classification; see Cortés, 2000; Hardiman & Jackson, 1997) or the legitimacy, relevance, and importance of other cultures or voices (especially voices of critique) that might arise from them (Delpit, 1995; Howard, 1999). It is most familiar as ‘White privilege,’ but the concept can be (and has been) broadened to apply to other hegemonic groups—males, heterosexuals, affluent classes, etc. (e.g., Code, 1991; Hardiman & Jackson, 1997; McIntosh, 1988).

More recently, that same lens has been turned upon religion as a place where privilege may lie. The discussion usually focuses on Christianity, the most popular religious group (taken together) in the

U.S., and whether (and in what ways) Christianity is a privileged identity (Hardiman & Jackson, 1997). Some contend that religion has been, if anything, deprivileged in modern American society (Carter, 1993/1994; Nord & Haynes, 1998; Whitehead, 1991, 1994) or perhaps deprivileged in comparison to other non-religious interest groups (Baer, 1998; Smith, 2001).

Other writers, dismissing this as petulance from (perhaps formerly) privileged elites who have lost their supremacy, would say that Christianity is *the* privileged religious identity (Hardiman & Young, 1997). Still, this is rarely the focus of such work, as Christianity as a privileged identity may be mentioned only in passing (Young, 1990) or asserted as an example of privilege as though it were self-evident, without actually providing evidence to warrant the claim (Hardiman & Jackson, 1997).

Still, to those not Christian,¹ the dominance of this religious identity group may appear as strong as ever in the cultural norms and commonplaces they see around them every day, and this is the area explored by Clark et al. (2002), Clark (2003), and Clark & Brimhall-Vargas (2003) earlier this decade in three issues of *Multicultural Education*. They tackle this difficult and important subject head-on, when many in education (and society at large) would

sooner avoid it (Clark & Brimhall-Vargas, 2003; Marty & Moore, 2000; Nash, 2001; Nord, 1995; Purpel, 1989), and this article is a response to that series of articles.

The goal of this article and those previous articles upon which I will comment is to clarify where and how Christian privilege occurs, what its effects are, and how to overturn it. The study of Christian privilege and how it impacts public education on an institutional (the Clark articles’ primary focus) and pedagogical level is important work and an essential building block in dismantling religious oppression (both *of* and *by* religious groups). I examine these articles in an effort to demonstrate how the use of language, presentation of ideas, application of core principles (directly upon subjects and reflectively upon the authors), and gaps in knowledge of the subject being studied² can impair the effectiveness and power of the argument presented, as well as conveying bias or negative subtext even while striving toward a robust and nuanced understanding of power, privilege, and identity.

Characterizing Christianity

In exploring the nature of Christian privilege, these articles focus more on the second word than the first. Peggy McIntosh’s (1988) list of indicators of privilege is replicated in full in Clark et

Three Articles from Previous Issues of *Multicultural Education* Are Discussed in This Perspective

- ◆ Clark, C. (2003). Diversity issues in higher education: A case study of multicultural organizational development through the lens of religion, spirituality, faith, and secular inclusion. *Multicultural Education*, 10(3), 48-54.
- ◆ Clark, C., & Brimhall-Vargas, M. (2003). Diversity initiatives in higher education: Secular aspects and international implications of Christian privilege. *Multicultural Education*, 11(1), 55-57.
- ◆ Clark, C., Brimhall-Vargas, M., Schlosser, L., & Alimo, C. (2002). It’s not just “Secret Santa” in December: Addressing educational and workplace climate issues linked to Christian privilege. *Multicultural Education*, 10(2), 52-57.

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al. (2002), though it is to be left to the reader to infer the transferability of all points of McIntosh's White privilege construct to Christianity. In many cases, you could fairly ask whether the frames of mind McIntosh's descriptors indicate is something arising from religious identity, whether they arise elsewhere and are then applied to religious identity, or whether holding an identity element that *can* lend itself to privilege (whether you personally identify with or claim that privilege) provides fertile soil for growing these sorts of universalizing attitudes. That stated, Clark's appropriation of McIntosh's list ranges from clearly true (perhaps one-fourth of the list), through a range of maybes, to more than half the list which is either highly questionable or patently false when applied to Christian identity on its own (i.e., unless combined with other identities).

There is also little explanation of what is meant by 'Christian,' as though its meaning were self-evident. The picture we are given of Christianity is vague and undifferentiated, a stereotypical portrait of Christians as a unitary bloc. Clark et al. (2002) uses as a point of evidence a group of six Christian athletes whose views on religion are described as "absent critical consciousness about Christianity (or other belief systems) and based largely on a sort of cross between Christian fundamentalist ideology and superficial representations of Christianity in popular culture" (p. 55). This seems like a curious choice for what is being proffered as an exemplary position; are they to be taken for typical or representative Christians, when the depiction of them seems to be anything but?³

The limited and essentialized picture of Christian identity stands in contrast to the considerable level of detail Clark (2003) uses in describing the ethnic and national backgrounds of office workers (p. 50), perhaps suggesting the relative importance she places on the nuances of each. Denominational differences, ethno-religious particularities, and even which element or sect of Christianity, which many see itself as vastly different from other nominal coreligionists (to the point of denying other groups as genuinely part of their religious group), are simplified, silenced, and dismissed as irrelevant.

Legal Issues

In exploring Christian privilege as a violation of separation in schools and other public spaces, however, Clark and her col-

leagues appear to have interpreted the proscription on establishment of religion as equating a total ban or prohibition on any public religious display, discussion, or expression. There is indeed legal basis, as Clark and Brimhall-Vargas (2003) state, that "public displays of a religious nature—practices and/or symbols—be limited by the parameters of time, place, and manner" (p. 55). They neglect to mention, however, that such content-based limitations also require that "regulation is necessary to serve a compelling state interest and that it is narrowly drawn to achieve that end" (*Perry Education Association v. Perry Local Educators' Association*, 1983, cited in Whitehead, 1991).

Further, Chief Justice Warren Burger wrote in *Wisconsin v. Yoder* (1972): "only those interests of the highest order and those not otherwise served can overbalance legitimate claims to the free exercise of religion" (Alley, 1999). There is a tension here: Should the default condition be that religious exercise and expression are allowed, only to be restricted in unusual cases, as Burger would seem to favor; or should religious exercise and expression be disallowed as a baseline, legitimate only in specified circumstances, as Clark and Brimhall-Vargas would advocate?

Clark and Brimhall-Vargas (2003) suggest that elements with religious content in public spaces (such as schools) should be "held at a special time and place to afford individuals who want to attend it the opportunity to do so, and those who do not wish to attend the ability to avoid it, to *not* stumble upon it by accident in an open public space" (p. 55, italics in original). Thus, while admitting the necessity of making accommodation for expression, for those that want it, they suggest such things should be held under seal, not in any public place.

The 1984 Equal Access Act, however, holds that student groups⁴ with a religious, philosophical, or political basis enjoy equal access with any other 'noncurricular' group. Whitehead (1991) discusses the reinforcement of this principle in the 1990 *Mergens* decision, that "student groups covered in the [Equal Access] Act have equal access to *all* forums which other 'non-curriculum related student groups' have access to, including *student newspapers, bulletin boards, public address systems, and annual school events*. It is not limited to meeting rooms" (p. 119, italics in original). This would indicate that the idea of total segregation of ideology is untenable, that individuals or groups do not enjoy the

right to suppress the public expression or exercise of others simply in order to avoid having to witness it.

The struggle is examined in far greater depth elsewhere (e.g., Alley, 1999; Carter, 1993/1994; Eck, 1999; Fraser, 1999; Marshall, 2002; Smith, 2001; Whitehead, 1994), but the sum of it all is that two centuries and more of subsequent case law have further probed the questions of what constitutes establishment and free exercise, but the particulars remain contested and uncertain. Decisions generally (but not always) fall on the issue of whether a given action constitutes 'excessive entanglement'⁵ of government with religion. The clear-cut 'legal separation of religion and state' Clark and Brimhall-Vargas assume is a fiction that obscures the reality of a very complex issue. It is a nearly reflexive reaction to the notion of discussing religion in the public space, in ironic contrast to their concluding statements decrying this lack of honest discourse about religion.

Office Space

In talking about workplace culture, Clark (2003) describes Christian-themed computer screen-savers and offers of Christmas/Easter candy as being religiously oppressive to non-Christians in the office. She does not argue that these Christian trappings represented an apparent endorsement by her office at the university of a particular religious faith. She instead acknowledges them as commonplace manifestations of personal taste that create an atmosphere within which non-Christians feel out of place.

This begs the question of office decorum and policy in what will be allowed and why. Office décor may be standardized by office policy, but if personalization is allowed a subject-specific exclusion cannot be made toward religious choices. By *Tinker v. Des Moines* (1968), such non-verbal expression is covered by free speech protections in addition to free exercise grounds.⁶ Allowance of personal expression in office décor constitutes a limited public forum, and that forum cannot be restricted or regulated by supervisors simply because they do not care for the content expressed within it (except for illegal, threatening, or 'obscene' material). If such expression is to be limited by office rules, it must be closed to all expression *and* it must be shown that the forum was *not* ended solely to suppress a certain type of expression.

The offers of Christmas/Easter candy or greetings represent a more direct

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intrusion upon the ideological space of non-Christians. The initial offering of such is allowable on free exercise and speech grounds, but repeated offers to those who had expressed an objection or lack of interest could be construed as religiously based harassment and clearly ruled out, though not if they are simply taking place within range of their hearing or sight, unless the non-Christian claimants could put forward a case that it contributed to an actively hostile work atmosphere.

It is very true that those in the minority will feel that minority status keenly and may well feel disinclined to express themselves at all, or at least openly (Delpit, 1995). While they have the theoretical option to express themselves, those in the minority may adopt a “don’t ask, don’t tell” policy, a position they may feel forced into by the ignorance or presumed inability to understand on the part of their coworkers. This could be interpreted as a *de facto* type of evangelism; Jakobsen and Pellegrini (1999) describe this as “the universalizing move by which non-Christians might be invited to leave minority status behind and disappear into the majority’s ranks” (p. 107).

The prevalence of Christian identity exerts a not-so-subtle pressure for outsiders to get in line with the majority. Non-Christians feel excluded, not part of the group, and they are right: they are *not* part of the Christian identity group in the office. They are part of one group (office coworkers) and not part of another group (Christians) that *mostly* overlap. A majority of the office staff shares two (or more) identity features in common; those who are not Christian share one less identity feature in common with the majority of the group.

This is hardly dispositive of privilege by itself. Social groupings can certainly form around any number of demographic characteristics within the broader overall group of “office coworkers.” The ‘Asian women’ (though from four very different parts of Asia) in the office could conceivably draw together without regard to religion, or any other group. Social aggregation in the office and how to break into an established group is a social dynamics issue, and each person is constrained by the identities of which they are a part, whether by choice, by birth, or otherwise, and must connect at points of similarity or across points of difference.

The place where this situation moves from social dynamics to a manifestation of Christian privilege as an oppressive alignment of social forces is in the identification

of religious celebration within the office end-of-year celebration. One solution would be to have two parties, one for those who wanted a Christian Christmas party and one for those who did not. The practical issue is whether, because of their majority, the Christian party would become the *de facto* “office end-of-year party,” as Christians at the office might be disinclined from attending what (from their perspective) would seem to be two analogous parties; they might reasonably choose to just attend the one that appeals most to them, leaving the non-Christian office party devoid of most of the people at the office.

Segregation, even in office parties, has a familiar and unpleasant ring, but when Clark (2003) states that “it is going to take some time for the Christians in the office to figure out how to celebrate, and how to enjoy the celebration of, Christmas at a party that is not expressly a Christmas one” (p. 54), does she mean that Christians have an obligation to celebrate (and enjoy celebrating) their own religious event without being able to bring their religious identity to the party (literally and figuratively)?

Should people be compelled (even tacitly) to involve themselves socially with people with a different religious identity? Arguably, yes. However, should we compel people to celebrate a religiously affiliated holiday in a way that is outside of their religious identity? That seems dangerously close to either establishment (compulsory attendance at a religious event) or restraint on free exercise (limiting the ways in which a person can express their religious identity), depending on how the event is set up.

Even if the ‘December party’ is an open-ended, ecumenical event, the simple fact of the matter is that Christians have demands on their time for religion-related events at that time of the year which others whose religious holidays (if they have them) do not coincide with late December do not have. As Cobb (2002) describes the nature of community he states, “People need to belong somewhere and not simply everywhere” (pp. 147-8). Faced with a choice between celebrating their own religious holiday vs. the ecumenical work party, they might well choose the former and should not be gainsaid for doing so.

Writing Style

Pejorative Examples

These articles by Clark and colleagues in several places seem designed to create a negative impression in the way examples

are selected and arguments are structured. For example, Clark et al. (2002) refers to omnipresent bumper stickers reading “GOD [*sic*] Bless America” (p. 55). In comparison with the great majority of other bumper stickers (and similar items) with this phrase correctly capitalized, why include an incorrectly capitalized version as the best example? Elsewhere in the same article she examines the “God’s [*sic*] Squad”⁷ video, which critiques the proselytism of Christian athletes. *Sic* (Latin “so” or “thus”) is used to indicate incorrect usage that is repeated without change as part of a quotation. Its repeated use here seems a subtle attempt to impugn the intelligence of those who invoke God *qua* God; i.e., since only a fool would use bad punctuation or capitalization, *ipso facto* these must be fools. We must avoid the appearance of bias and be thoughtful about the language and examples we use and the subtext conveyed by them.

Syntax

In discussing the “God’s Squad” video, the narrative implies an attribution of responsibility for the program’s content to the subjects of the program, rather than its creators. A valid critique is offered of the program’s lack of attention to atheistic or scientific rationalism, following directly on the heels of a characterization of the Christians interviewed in the program and their intolerance of other views. The contextual flow implies that the lack of attention to atheistic and secular rationalism is a result of the attitudes of the Christians being described, rather than those who created, produced, and edited the program. These individuals may be Christians or they may not—we know nothing about them—but the attribution for the limited scope of the program is left contextually at the feet of the interviewees in the program, as though *their* intolerance is responsible.

Terms of Art

Clark et al. (2002) refers to the “lip service paid to the legal separation of religion and state in the public sector” (p. 52), which in an endnote it states is “usually referred to as ‘church’—a Christian place of worship—and state” (p. 57). She offers the former as a superior alternative because she is ascribing a specific meaning to the use of the word ‘church’ in order to make her point, one that does not match the historical bases of the concept of separation.⁸

The goal of separation was not only (and perhaps not even primarily) to prevent

undue religious influence upon government but also to guarantee freedom of conscience and expression in matters of religion. This could not be achieved through 'toleration' of different religions under the umbrella of a single established faith⁹; hence, the goal of separation back to pre-Constitutional legislation such as Jefferson's Bill for Enacting Religious Freedom in Virginia (Alley, 1999) was the disestablishment of colonial churches. This did not refer to places of worship but to administratively sanctioned, endorsed, and supported religious organizations. These organizations, modeled in form after the state-sanctioned, endorsed, and supported Church of England, were present in most of the colonies at the time of the revolution and in some states for the next half-century.

The attempted equation and supersession of 'church' with 'religion' is seemingly passed off as a simple refinement in the language to avoid bias when in fact it changes the meaning and implications of the phrase, relying on using only this strict and exclusive definition. 'Church' may also refer to the whole of an established faith, the religious functionaries of that faith group, the membership of constituents, or the organizational structure of the faith tradition (which may subsume some, none, or all of the former groups), the last of which is the meaning closest to Jefferson's usage. To suggest that church is a term restricted in meaning to the physical place of worship used by Christians is not only inaccurate but also misleading. Such appropriation of the language conveys the impression that a writer is cleverly pointing out syntactic privilege already embedded in the language (exegesis) when in fact it is actually reading new and specific meanings *into* the language (eisegesis) or interpreting one possible meaning as being the definitive meaning. This creates a shaky (and at best speculative) foundation upon which to build an argument.

Unbalanced Comparison

Presenting an example as one side of a comparison without providing a counterexample to actually compare undermines credibility. One such example in Clark and Brimhall-Vargas (2003) is the description of the intermittent vandalism of Jewish synagogues as representative of "individual and institutional prejudice and discrimination" (p. 55). While absolutely true, the example is offered without evidently researching intermittent vandalism of Christian religious buildings, nor of the

motivations for such acts. We are thus left with a powerful example on the one hand, but one implicitly designed to create a comparison with Christian experience, and in lacking information we are left with the mistaken impression that no such events occur on the Christian side.

Conclusions

How can we engage in community and dialogue with those of different beliefs when not all beliefs are equally amenable to compartmentalization or being 'left at the door' (Nash, 2001)? How can we acknowledge, engage, and respect difference, even irreconcilable difference, and yet still work toward practical solutions to issues of mutual concern (Strike, 1998; Strike & Soltis, 1992)? While doing this, how can we get past the felt need to 'convert' the other, to compel them to accept our perspective as 'truth' (especially when one side of the argument believes in absolute Truth and the other does not), precisely the sort of violation of conscience that Jefferson and Madison strove to prevent (Alley, 1999; McClellan, 1998)?

In creating stronger and more holistically faithful work on Christian privilege, it is first necessary to problematize the idea of a unitary Christianity or (even more absurdly) "Judeo-Christian" identity rather than essentializing its complex diversity out of existence. One route would be to explore the different modes of religious belief and experience, as Nash (2001) has done. His *Mainline* and *Explorer* narratives of Christian experience clearly fit the privileged profile Clark suggests, while the *Secular Humanist* and *Wounded Belief* narratives would have strong questions attached. The *Orthodox* and *Activist* narratives (comparable to the *Fundamentalist* and *Prophetic* narratives in Nash (1999)) are much harder to characterize as embodying Christian privilege.

Of course, privilege can attach to an identity regardless of awareness or active exercise of its benefits. What makes privilege so pernicious is that it doesn't require 'bad' people to do intentionally 'bad' things; it can spread by the inertia and negligence of everyday life (Hardiman & Jackson, 1997). Some privilege applies regardless of the specific flavor of Christianity or approach to religious life, including some that is a matter of numerical probability, given the prevalence of pan-Christian ideas and people in the United States both now and for most of its past. Other areas of privilege are more contingent on situation and context.

In terms of Christian privilege in education, how does the educational profession and setting compare to the broader society? Even to the extent that Christian privilege *does* exist in society at large,¹⁰ we cannot assume it exists in the same way in education. What language and behavior are a valid part of academic discourse and school climate? Clark and Brimhall-Vargas (2003) provide an excellent example of Christian privilege (and Muslim lack of privilege) in talking about Muslim university students' difficulties in securing appropriate prayer space on campus. As we think about public education, how open and explicit may students and staff be in talking about religious issues not only in the curriculum but in the everyday life inside and outside the classroom?

Much of Christian privilege derives from the sense of perceived solidarity or the anticipation (or everyday experience) of embedded community support for Christian modes of speech and thought, being able to appeal to authority figures in the confidence of them being a coreligionist. This becomes less likely when applied to an educational field that is less populated with the religious, much less with Christians, and still less with Christians of the same variety as any given person, than the general population—in particular social studies teachers, those most likely to have thematic opportunity to discuss religion in their courses (Smith, 2001).

Textbooks and course resources typically denude history and culture of religious referents (Giroux & Freire, 1989; Sewall, 1998), and religion in the present is minimized as an element in identity formation (Nash, 2001; Nelson, 2004a, 2004b). Christian students (and other religious student groups, for that matter) have often had to resort to legal action to establish religious clubs and activities or access school space, and verbalized prayer is frowned upon when not forbidden, as is expression of religious identity by teachers (Carter, 1993/1994). Arguments derived from Christian premises are dismissed as less rational than those derived from a more humanistic calculus; for that matter, absolutist worldviews (which at its heart Christianity should be considered) are eschewed in favor of relativist ones (Baer, 1998; Nash, 1999, 2001; Purpel, 2001; Strike, 1998).

It is not so much that Christianity is completely absent as that what is there is so trivialized, so secularized, and so marginalized that it is scarcely recognizable,

and many points where it could or even should be noted it has been whitewashed out of the depictions of historical events or figures that were saturated with religious meaning, religious justification, or religious motivation (Carter, 1993/1994; Marty & Moore, 2000; McClellan, 1998; Nash, 2001; Nord, 1995). Perhaps meaningful discussion of religion as it relates to curriculum and policy in education is emblematic of Christian privilege (in the form of denial), or perhaps it deprivileges Christian ideas and peoples by failing to take them seriously.

Perhaps Clark and Brimhall-Vargas (2003) are correct when they claim that secularization of Christianity is partly constitutive of Christian privilege, providing an excuse for Christians to deny the connection to their faith (whenever it is convenient) while still seeming Christian enough to bother non-Christians, and even exacerbating the problem when other religions become secularized as well “because its secularization penetrates the mainstream furthest and provokes the least controversy when it does” (p. 55).

In sum, we must be careful not only in what we write but the ways that we write about issues of privilege, lest in trying to combat bias we may unwittingly display our own. By all means we should be vigorous in our pursuit and critique of privilege, oppression, and bias on both individual and group levels, but our proofs and examples should be clear, accurate, and fairly representative. Religion in general is an important issue in the lives of people—whether they themselves claim a religion or not—and pan-Christianity is what educators in the U.S. are most likely and most often to encounter.

One way to understand where religion fits into individual identity, school climate, and the community context in which our schools exist is to carefully apply tools of cross-cultural understanding such as the privilege concept and see how well religion (e.g., Christianity) fits in with other elements of personal, cultural, and social identity, like gender, race, class, and sexual orientation.

Afterword

One of Clark’s adapted privilege principles states, “I could write an article on Christian privilege without putting my own religion on trial” (p. 54). In writing an article about Christian privilege as a Christian, many would take issue with many criticisms I level against the legiti-

macy of Clark’s vision of Christian privilege as reflecting my own self-interested bias based on my Christian background (see Clark, p. 53), or would deem my writing an apologetic for Christian hegemony rooted in denial of power and privilege, or otherwise might ask the question of how I feel justified bringing my religious background into the issue at all as a valid perspectival lens. For that matter, other Christians of various stripes might ask how I could in good faith and conscience endorse any portion of her ideas, or they might agree, or perhaps say I am not going far enough.

From every direction, any person’s religion (or any other element of their identity) can be on trial anytime they write about it in the education field, especially when writing about the social dynamics of society that affect and are affected by the people, institutions, ideas, and faith of that religious tradition. My experiences are no more or less representative of all Christians than are those in the Clark articles; of course, to say that Clark and her associates have found something that is “only her experience,” that it doesn’t represent what happens in most cases, is a common reaction of an insider to privilege when confronted with examples that do exist (cf. Delpit, 1995).

At the same time, neither examples of privilege or examples *against* privilege can be assumed to be universally true. What must be understood is that Christianity takes many different forms, landing in rather different places on the scale of privilege depending on the sociocultural context around them, and the pan-Christian unity she appears to endorse is in many ways an illusion.

Understanding how different strands within the broad heading of Christianity occupy different places in the sociocultural matrix of oppression (Collins, 2000),¹¹ particularly in the field of education—and here a greater depth of understanding and careful attention to the use of language in how we talk and write are necessary if we are to avoid essentialism that would obscure the matter at hand—is crucial. As stated earlier in this article, and important to stress again here, the real goal needs to be clarifying where and how Christian privilege occurs, what its effects are, and how to overturn it.

Notes

¹ I use Christian here to mean Christian specifically, especially mainline Protestantism. See Carter (1993/1994) and Jakobsen & Pel-

legrini (1999) for a discussion of ‘Judeo-Christian’ as a historical nonesuch.

²This was a bit surprising, given that Clark posits near-unavoidable universal exposure to Christianity as one of the bases of its privilege, in addition to her own personal experience as a Christian earlier in her life (though describing a relatively low degree of engagement with that ideology and experience) and in Christian-dominated work spaces (Clark, 2003).

³ This seems to violate one of McIntosh’s principles cited by Clark et al. (2002): “I am likely not judged by the improper actions of others in my religious group.” Judging the words and actions of these players to be improper may be appropriate, but not when used to evaluate other Christians using these data as evidence.

⁴ *Mergens* extended the principles of *Widmar* to secondary school students (*Widmar* addressed public college students), and possibly to younger students as well (see Whitehead, 1991).

⁵ One of the Constitutional tests established by Justice Burger in 1971 *Lemon v. Kurtzman*.

⁶ This right was extended to teachers in 1972 in *James v. Board of Education*.

⁷ “God’s” indicates the possessive case (belonging to God), not a contraction (God is) or misspelled plural (Gods).

⁸ Including Jefferson’s 1802 letter to the Danbury Baptist Association that coined the term “separation of church and state” (Alley, 1999; Fraser, 1999).

⁹ After all, a grant of toleration implies the power to rescind that toleration—to persecute, to regulate, and to impose sanction on dissenters (Alley, 1999; Marshall, 2002).

¹⁰ This can vary greatly in different regions of the country; for example, see Killen & Silk (2004) for an exploration of the Pacific Northwest as an area where organized Christianity takes a back seat in both numbers and ideological force in the face of atheist, nontheist, and individual-spiritualist alternatives.

¹¹ Clark (2003) does make reference to hierarchies of oppression, but her exploration of the concept is limited to presenting it (without really exploring it) as a reason why Christian privilege is often not judged sufficiently important or problematic to warrant examination.

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