

A REVIEW OF THE CURRENT LITERATURE, BOTH PRO AND CON, CONCERNING
THE USE OF SCHOOL UNIFORMS

by

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(Under the Direction of Norman Thomson)

ABSTRACT

Since the implementation of school uniforms in the 1950s, much controversy and debate has developed between parents and schools over the rights and privileges of the students and children involved. A literature review of the history behind uniforms, how they were implemented in the U.S., how they have been perceived, facts as to their success rates, and a brief look at court cases in which uniforms were the main issue of debate was the main method to this study. It was determined that the results of this literature review are decidedly mixed, thus, no correlations between uniform policy implementation and student behavior can be drawn.

INDEX WORDS: School uniforms, Literature review, Pros, Cons, The University of Georgia

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DEDICATION

I would like to dedicate this thesis to my dear family and close friends, who supported me through the long, arduous process. Without their love, guidance, patience, and attention, this would have been an insurmountable feat. I would also like to dedicate this thesis to myself, for believing I could accomplish this goal, even when it seemed bleak and unattainable. Lastly, I am dedicating this body of work to my home, Nigeria, for being my rock through all of these years.

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CHAPTER 1

INTRODUCTION

Constitutional Relevance

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances (“Bill of Rights,” 1791).

The history of speech in America has proven to be a long-standing tug-of-war between what is acceptable as free speech and what is not protected under the rights of the constitution. Generally, the constitution protects freedom of speech under all circumstances except those determined by the Supreme Court as “obscene.” Countless cases have been presented to the Supreme Court regarding the use of free speech and its implications. All these cases assisted the Supreme Court in developing strategies and tests to reduce the obscurities in constitutional interpretation regarding obscenities within free speech.

What is obscenity? ... The Supreme Court has created a three-part test, known as the *Miller* test, to determine whether a work is obscene. The

Miller test asks:

(a) whether the “average person applying contemporary community standards” would find that the work, taken as a whole, appeals to the prurient interest; (b) whether the work depicts or describes, in a patently offensive way, sexual conduct specifically defined by the applicable state law; and (c) whether the work, taken as a whole, lacks serious literary, artistic, political, or scientific value.

Historical Relevance

Historically, school uniforms have been traced into the 1800s. Widely used by European school systems, uniforms enforced structure and discipline amongst students. Although the use of uniforms as a practice was common around the world, they did not make a strong presence in the United States until the 1950s.

The presumption, variously expressed, that dress affects behavior and performance is, of course, not a new one. “Clothes make the man.” “The apparel oft proclaims the man.” “Good clothes open all doors.” “Beware of all enterprises that require new clothes.”

The dictum “Dress right, act right” was heard often in schools in the 1950s and ‘60s during campaigns to curb “juvenile delinquency.” In

the 1950s, many school dress codes prohibited girls from wearing slacks.

In the 1960s, many school administrators stipulated the length of girls'

skirts. Blue jeans, motorcycle boots, and black leather jackets were

considered dangerous attire on boys and linked to gangs (Anderson p. 4).

Despite their arrival in the '50s and '60s, uniforms were still mostly present in private schools. Due to pressures placed on school systems by the government due to increased gang activity in the 80s, uniforms found their way into the public school system.

In the 1980s, an effort to thwart growing gang activity in

schools led school officials to reexamine their schools' dress codes and

consider policies requiring uniforms. Restrictive dress codes were

introduced in many secondary schools with the intent of prohibiting gang

attire (Anderson p. 4).

With these new policies under discussion, public school districts and individual schools established dress codes detailing the restrictions against certain clothing. A pioneer, Cherry Hill Elementary in Baltimore, Maryland became the first public school to adopt uniforms in 1987. Later, in 1994, Long Beach Unified School District became the first school district to adopt a district-wide uniform dress code policy.

Political Involvement

Even though small steps were taking place toward uniforms around the nation, progress was sluggish and often impeded by a shared unawareness of the implications of uniforms. Progress took a sudden lunge forward; however, when President Bill Clinton endorsed uniforms in his 1996 State of the Union Address.

“I challenge all our schools to teach character education, to teach good values and good citizenship. And if it means that teenagers will stop killing each other over designer jackets, then our public schools should be able to require their students to wear school uniforms (W. Clinton, speech, January 23 1996).”

Through this address, people were suddenly made aware of a new, potential factor that could alleviate school violence, danger, and gang related activity. Fueled by President Clinton’s popularity, the proposal swiftly took flight.

Mr. Clinton selected the Jackie Robinson Academy as the place to showcase his support of uniforms because in 1994, Long Beach made uniforms mandatory for all 58,500 students in its elementary and middle schools (Mitchell 1996).

Contrary to arguments that the implementation of uniforms has never produced lower crime statistics, school officials discovered otherwise. In addition, the president issued a report with the expectations of the new policy.

In the following year, school officials found that school crime had decreased by 36 percent. Students at the academy wear blue or white polo shirts, blue pants or plaid skirts.

The guidelines say the potential benefits of school uniforms include decreasing violence, keeping gang colors and insignias out of schools, instilling discipline, fostering more concentration on studies and helping officials recognize school intruders (Mitchell 1996).

As expected, not all were in support of President Clinton's proposal. Many felt that it restricted the students' ability to exercise their right to the first amendment. Freedom of speech suddenly became the forerunner of many political debates, rallies, and public displays.

The President dismissed critics who say that school uniforms hinder free expression. "I think these uniforms do not stamp out individuality among our young people," he said at the rally. "Instead, they slowly teach our young people one of life's most important lessons:

that what really counts is what you are and what you become on the inside, rather than what you are wearing on the outside."

He made the same point when he called a small meeting with 13 civic leaders and students to hear their views, one of his trademark discussion sessions. "There are still differences in people," Mr. Clinton prompted.

The manual on school uniforms prepared by the Education Department... to explain the wide degree of religious expression allowed in schools under current law. The manual notes that a uniform policy must accommodate students who wear yarmulkes or head scarves as a religious practice.

It also says the policy may not prohibit students from wearing "expressive items" like political buttons (Mitchell 1996).

Soon, political figures began to speak against the method in which the president was introducing the effort to make uniforms a nationally enforced policy.

When Mr. Clinton first mentioned school uniforms in his State of the Union address, Senator Phil Gramm of Texas... accused the President of a tendency toward intrusive government. The President went out of his way

today to stress that the uniform policy was voluntary and up to individual school districts to impose -- not the Federal Government (Mitchell 1996).

Current Position of School Uniforms

Today, school uniforms are an even bigger hot topic. Initially, the main question was whether or not the advantages outweighed the disadvantages. The climate surrounding the topic indicates that people are beginning to believe so. In 1997, the fraction of schools that were requiring some sort of uniform was only 3%. By 1999, this number had risen to 22%. Public schools have especially developed an affinity for uniforms. Today, 95% of New Orleans', 85% of Cleveland's, and 80% of Chicago's public schools all require uniforms. Despite this, the vast majorities of public schools in the United States still do not require uniforms; however, dress codes are almost always implemented. According to a phone survey conducted by the National Association of Elementary School Principals, 23% of all public, private and sectarian schools either had uniforms or had firm plans to implement a uniform policy in the near future (Yeung 2007).

CHAPTER 2

RESEARCH QUESTION AND METHODS

How the Study Came to Life

Initially, the purpose of this study was to focus on whether or not uniform policy in science laboratories was both safe and effective. Research discovered little to no written literature on this. Moreover, research indicated that a look at the administration behind such decisions would serve as a better understanding of the policies involved. It was found that an overwhelming number of schools have separate dress codes for their general population and students involved in the science laboratories. In the end, it was decided that this literature review would focus on general uniform policies and dress codes rather than science uniform policies.

The Question

The shroud of confusion and controversy surrounding school uniform implementation, helped inspire this study. The conceptualization of policy and the effects that it may have on students' achievement, behavior, success, etc., formed the research question, "What *exactly* is the literature behind the correlation between school uniforms and positive student behavior, if one exists?" Many articles and papers written on this topic, focus primarily on the administrative

system enforcing the uniform policy. Essentially, reasons for why schools adopt uniforms are always provided and are usually consistent from school to school. Very few studies give credibility to the opinions of experts and non-experts on the issues of uniform policy. Making this paper special, a an analysis on a mixed review of opinions surrounding uniform necessity and effectiveness is provided for a better, crisper understanding of the atmosphere enshrouding uniform policy. Additionally, monumental court cases are provided for the reader to understand the legalities of the situations mentioned. Although there were many smaller cases that influenced future court decisions and continue to provide understanding and guidance relating to uniform issues, special focus and emphasis was placed on Supreme Court cases, as they are highly influential. Additionally, many lesser cases are referenced in these Supreme Court cases.

The Tradition of Doing Research Using Historical Documents

Following the protocols of historical research, primary sources made up a bulk of the references used in this study, with secondary sources used sparingly. Included in this were three different types of literature reviews: court cases and legal opinions, opinion papers and essays, and empirical research on the matter. Much of the works cited in this review were accessed through Google Scholar, Galileo, EBSCO, Google Search, and the ERIC database. In the tradition of doing research using historical documents, care is taken to make sure that proper credit is given to the authors of the bodies of work. Truly deserving praise for the hard work and

information they provided the educational field, the authors mentioned in this literature review are all deserving of praises and gratitude.

CHAPTER 3

RESULTS

Pros and Cons of School Uniforms

With the rise of media attention caused by the controversy surrounding President Clinton and the uniform debate, psychologists and psychiatrists all over the world began to research the implications and psychological effects of uniforms on the behavior patterns of students. They discovered that uniforms were attributed with both positive and negative results. Amongst the positives were the instillation of a sense of purpose, social and economic equalization, and the alleviation of certain financial strains on parents. Although these seem ideal, many counter-arguments against uniforms have been levied. For example, even though uniforms have the potential to instill purpose in students, many have reported feeling less important, repressed, and even less respected because of uniforms. This has led to drop-outs in some cases as very sensitive students were not able to deal with the change. Next, even though uniforms have social equalizing factors that reduce bullying and emotional distraught, there are some equally uncontrollable elements that stimulate bullying, such as physical abnormalities. Thus,

bullying against these students continues even under the magical, protective cloak of uniforms. Lastly, with the financial savings those uniforms provide come undeniable financial strains that many parents never foresee. If a family purchases two school uniforms, they must be worn five days a week. This means they must be laundered more often than regular clothes. Families without laundry facilities in their homes may not have the means to make additional trips to a commercial Laundromat. Additionally, families may not have the financial ability to repair or replace damaged or ill-fitting uniform components. Thus, many families are forced to purchase sub-par uniforms, which prompt the very social ostracism school uniforms were ostensibly designed to prevent.

Most strikingly, in 1997, Australia even made it illegal for public schools to require uniforms. Some other places throughout the world have similar regulations (Yeung 2007). The main arguments of these countries surround developmental issues. It is a fact that the majority of students use their clothing as a way to express themselves. Taking away that right to self-expression may hinder individuality, creativity, and affect self-esteem. However, these things are very difficult to measure. This makes producing hard evidence through research a challenge.

Despite this, many schools all over found a positive difference in the behavior of their students after the implementation of uniforms. One of the most famous achievements of uniforms took place in California's Long Beach school district. After one year of uniform implementation, the school reported that fights and muggings had decreased by 50%, while committed sexual offenses were reduced by 74%. Elsewhere in the country, similar discoveries were taking place. For instance, at Ruffner Middle School in Norfolk, the number of discipline referrals decreased by 42% once uniforms were enforced (Williams 2010).

Critical Analysis of Opinion Papers

In light of all the debates and controversies surrounding school uniform implementation and practices, personal and scholarly opinions began to grow in abundance. Heated articles were written and continue to be written in favor of both sides of the argument.

Student Dress Codes

In this article posted by the Clearinghouse on Educational Policy and Management (CEPM), Lynne Isaacson details personal and expert opinions on uniforms and their impacts on students. Her article serves as a nice preliminary understanding to uniforms and the controversy surrounding it. It seems as though her main purpose is to

identify if school uniforms are actually effective and if so, the proper way to implement them. Her opinion goes as follows:

In recent years, schools across the country have experienced violence, gang activity, and thefts of clothing and accessories. Many school boards, mindful of their responsibility to provide safe school environments for students, have implemented policies specifying dress codes or the wearing of uniforms.

As many as 25 percent of the nation's public elementary, middle, and junior high schools were expected to implement dress-related policies during the 1997-98 school year, according to the California School News (March 31, 1997). Ten states allow school districts to mandate school uniforms.

Educators and the public are divided over the value of implementing school-uniform policies in the public schools. This Digest examines arguments for and against school-uniform policies, identifies legal considerations, and offers guidelines for implementing policies on student dress.

What Are the Arguments in Favor of School Uniforms?

In her essay, Isaacson provides an understanding as to the arguments for and against school uniforms. She claims the benefits of uniforms to be: making schools safer, reducing gang influence, minimizing violence by reducing sources of conflict, and helping to identify trespassers. She also projects that parents would benefit because they would no longer be pressured to buy the latest fashions, thereby spending less on their children's clothing.

What Are the Arguments in Opposition?

In contrast, Isaacson expresses that “opponents contend that school-uniform policies infringe upon students' First Amendment rights to freedom of expression; interfere with students' natural tendency to experiment with their identities; are tools of administrative power and social control; offer a piecemeal approach to issues of racial and economic injustice; and may discriminate against students from minority backgrounds” (Caruso 1996, Cohn and Siegal 1996, cited in Isaacson 1998).

What Are the Outcomes to Date?

As expected, Isaacson refers to the Long Beach (California) Unified School District as an example of successful uniform implementation. It was the first U.S. public school system to require uniforms for elementary and middle school students.

Interestingly, before implementing its policy in September 1994, the school district required approval from two-thirds of the parents (Caruso 1996, cited in Isaacson 1998).

Specific details on the success of the uniform implementation follow:

Long Beach Superintendent Carl A. Cohn reported that during the first year suspensions decreased by 32 percent, school crime by 36 percent, fighting by 51 percent, and vandalism by 18 percent (Cohn, cited in Isaacson 1998). At Whittier Elementary, attendance rates have risen each year since the policy went into effect, reaching a high of 96 percent.

Schools in Chicago, Florida, Georgia, Louisiana, Maryland, New York, and Virginia have made similar claims (Caruso, cited in Isaacson 1998).

An interesting effect of the Long Beach uniform effort was that the parents responded favorably to uniform policies. “In Long Beach, only 500 parents petitioned to opt their children out of the mandate” (Isaacson 1998).

What Not to Wear

In this article entitled, “What Not to Wear,” Dianne Gereluk does a superb job of detailing the complications of enforcing a school dress code. One of her main points of contention regards the issues surrounding what is considered “symbolic clothing.” She

claims that there is a lack of clarity and ambiguity over what children should be allowed to wear. She believes that because of this, policies regarding symbolic clothing are inconsistent and erratic, at best. An introduction to her opinion on the matter goes as follows:

Schools shoulder much of the burden in trying to maintain the delicate balance between celebrating diversity, on the one hand, and instilling a cohesive shared ethos, on the other. To what extent can or should schools promote the kind of diversity that is reflective of the broader society? If clothing is a significant part of some individuals' identity, are schools obliged to accommodate their requests and alter established uniform policies? By allowing certain exemptions to some individuals and groups, do schools privilege some affiliations and associations over others? Do we also undermine other arguably important values that may be linked to the existence of uniform policies? Symbolic clothing raises, then, a number of dilemmas for the common school (Gereluk 2007).

It is her belief that the debate surrounding symbolic clothing must be addressed.

To her, symbolic clothing can be categorized as pieces of clothing or accessories that

signify parts of an individual's identity. The symbol may have varying levels of significance to an individual. It may be simply an outward expression of what one believes, or it may be more like an essential part of one's identity. Her entire argument centers around her opinion that if the symbolic item of clothing has religious significance, its removal may be seen as compromising a part of oneself. She also makes good points in stating that, "Symbolic clothing...can have a significance that is other than religious, a significance that is political or social. Wearing black may be tied to many different things. For instance, it has been connected to Goths, or to bereavement, and it may be a gesture towards the black armbands of the IRA. Similarly, wearing a piece of 'gang wear' is a strong symbol of allegiance to a particular group or cult. Individuals may wear a particular coloured ribbon to express their support for associations or movements, as in the case of the pink ribbon for breast cancer or 'Make Poverty History' wristbands" (Gereluk 2007).

Gereluk is advocating for a push towards clearer, more precise dress code policies. She believes that with clearer policies, educators and policy analysts will be able to deal with students in a more consistent way. A point of frustration for her is that decisions regarding dress rest primarily with those who are in office at a particular time, and this is so in the cases of politicians, judges and educators. And if these people

change by the time the next challenge about clothing is brought to the fore, so do the decisions about how to deal with the issue.

Gereluk argues that the way in which Canada has dealt with the problem of defining the parameters can provide the U.S. with some guidance. Her opinion goes as follows:

The idea of 'reasonable accommodation' takes a proactive stance with regard to how best to adapt institutions in order to redress the inequitable treatment of those in the minority who are particularly disadvantaged. The onus is on those who wish to maintain the status quo to provide clear evidence to suggest that allowing symbolic clothing is likely to cause undue hardship on others. The criterion of offensiveness does not hold enough weight because judgments on such matters are always relative. How then do we create parameters of acceptable and appropriate clothing in schools? Clearly on the strength of the present argument, limits to clothing should exist in schools. Three considerations for both dress codes and uniform policies seem appropriate for judging clothing permissible or impermissible:

- 1) Does the clothing create health and safety concerns?

- 2) Is the clothing oppressive to oneself or to others?
- 3) Does the clothing significantly inhibit the educational aims of the school?

A fourth consideration then applies to schools where there is an already established uniform policy:

- 4) Is the clothing essential to one's identity? (Gereluk 2007)

In her conclusion, Gereluk claims that the heavy-handedness of schools in banning potentially offensive or disruptive clothing has not helped in providing clearer dress-code policy. "The arbitrariness of how the lines are drawn seems both unjust and discriminatory in many of the instances, cloaked as it is behind ambiguous, rhetorical school policies. These shifting and changing stances provide little assistance to other schools that face similar dilemmas" (Gereluk 2007).

She furthers her push for clearer policies by stating, "Creating flexible, yet consistent, guidelines that cut across all religious, social and political divisions, and are based on the best interests of children, in the light of their physical, emotional and developmental needs, is a sensible and pragmatic way in which to approach symbolic clothing. The criteria for such guidelines do not eliminate individuals' fundamental freedoms but offer reasonable parameters within which certain symbols may not be

judged appropriate, at least in the school setting. This approach still allows the possibility for implementing or maintaining a uniform policy, should schools so wish” (Gereluk 2007).

SCHOOL UNIFORMS: Does What Students Wear Really Make A Difference?

In this very opinionated article written by, Russell E. Eppinger, school uniforms are viciously tackled and their necessity put under serious scrutiny. This is by far one of the more opinionated articles. Written in simple elegance, Eppinger’s views go as follows:

Are school uniforms a false remedy for serious underlying issues in public schools? Are we making an attempt to return to the 1950’s, when boys’ hair was not permitted to touch their collars and girls wore knee-length skirts? This paper will explore the various aspects of the incorporation of a school uniform policy in public schools. This study will also examine the positive and negative assumptions that are involved in the school uniform controversy.

Claybaugh and Rozycki (1977, cited in Eppinger, 2009) have determined that a controversy cannot exist without a fundamental dispute. Eppinger does not believe that the answer to the school uniform debate is a simple yes or no answer. He also believes

that there is no clear consensus as to the benefits of school uniforms. Within his research he found that:

The American Civil Liberties Union (ACLU) has argued that due to a lack of research, it is currently impossible to ascertain whether the wearing of uniforms is responsible for producing positive changes in student behavior. The ACLU has proposed that mandatory uniforms violate a student's free expression rights (King, 1998, cited in Eppinger, 2009).

Eppinger is very clear in his opinion that children are living, free thinking individuals and thus, their rights must be protected, with or without uniforms. He does not believe that there have been enough studies done to totally indicate that the wearing of uniforms will consistently create positive behavioral changes in student behavior. School uniforms may not work in every community. He does not believe that simply because it may work well in an inner city school, means it will be necessary in a suburb. Eppinger (2009) even takes liberties to state his personal opinion more clearly, "I do not believe that uniforms should be considered as a way to fix every school problem. But if they help teachers to get on with the business of teaching and learning, it may be in a

school's best interest to keep an open mind about looking at them as a possible alternative."

In his conclusion, he adamantly supports that there is no magical solution to the stopping of school violence and the improvement of discipline. Instead, he believes that much of this answer lies in the chemistry that exists in a school between students and staff. Although, uniforms may appear to the public as the cure-all for a schools' ills, Eppinger believes that the ultimate decision on behavioral change is made by the children themselves.

School Uniforms: The Raging Debate

In this article entitled, "School Uniforms: The Raging Debate," Darlene Williams passes serious judgment on the advocacy of school uniforms. This article leaves no room for guesswork concerning her opinion on the matter. Completely against uniforms, Darlene Williams' opinions are presented as follows:

Despite the apparent success of some uniform policies, these often highly restrictive codes are not without problems. First, the highly favorable anecdotal reports coming from some school districts with uniform policies contrast sharply with the emerging empirical studies on the efficacy of uniforms. The recent data does not support the claims

made by uniform proponents. Also, if provision is not made to permit parents to opt out (exempt their children from these policies), the codes are vulnerable to legal challenge (United 3, cited in Williams, 2010).

Sadly, some districts in an attempt to have a successful uniform code are overzealous in their enforcement techniques, causing confusion and stress for school staff and parents and often humiliation for students. While requiring public school students to wear uniforms may sound like an attractive quick fix to some, actual implementation of these highly restrictive policies is often rife with difficulties.

Almost immediately, she begins to attack the reported success of uniform implementation in the California Long Beach Unified School District. She reported that “During a telephone interview in April 1996, Dick Van Der Laan, Long Beach Unified School District spokesman, stated that the only change which had occurred in the district, prior to the improved discipline results, was the implementation of the uniform policy. However, in the study conducted by Drs. David L. Brunsma and Kerry A. Rockquemore of the University of Notre Dame, a closer look at the Long Beach case revealed that several other reforms were put in place at the same time or shortly prior to the implementation of the uniform policy” (Williams 2010). Although, uniforms were the

most visible change, Williams suggests that the improvements were more likely attributable to the other programs "...which included, among other initiatives, a \$1 million grant from the Edna McConnell Clark Foundation for the improvement of teaching methods (Brunsma and Rockquemore, cited in Williams, 2010). Her research eventually led her to conclusions about the results reported by the Long Beach Unified School District, "Despite the claims that the improving disciplinary numbers being issued by Long Beach, California, are attributable to uniforms, the data seems to contradict those assertions" (Williams 2010).

Next, Williams attacks the claim that uniforms improve attendance. She states that although attendance in the Long Beach Unified School District has slowly improved in elementary and middle schools since their mandatory uniform policy has been in effect. Attendance has also improved at the high schools where no uniforms are required, at a more statistically significant rate ("In Schools" 2, cited in Williams 2010). She suggests that this indicates an overall trend rather than uniform-induced improvement. Best said in her *exact* words, Williams' conclusion on school uniform effectiveness goes as follows:

All empirical research in existence shows, beyond question that uniforms are ineffective as the magic bullet proponents claim them to be.

There is no reasonable justification for denying a child, who is ready and eager to learn, his/her education because of the color or shade of a shirt.

In light of the lack of positive empirical research results, costly potential legal challenges, and enforcement abuses, perhaps mandatory school uniforms in our public schools are not a viable tool with which to help fix our limping educational system. We cannot afford to allow our schools to be used as laboratories and our children to be used as guinea pigs for new questionable fads founded in vanity and based on supposition.

Review of Empirical Research Literature

Dressed for Success: Do School Uniforms Improve Student Behavior, Attendance, and Achievement?

In the paper “Dressed for Success: Do School Uniforms Improve Student Behavior, Attendance, and Achievement?” written by Elisabetta Gentile and Scott Imberman, an empirical approach is used in order to determine if school uniforms have an impact on student outcomes in elementary grades. The paper provides interesting findings, all leading to the conclusion that school uniforms have little impact on student outcomes in elementary school. The study went as follows:

Despite the large growth in the use of uniforms in public schools, there is very little empirical research that has been done to assess their effectiveness. Only a handful of papers have tried to assess the effects of uniforms on student outcomes. This is despite the evidence that there is a substantial correlation between discipline, which uniforms would most likely affect, and achievement (Gentile & Imberman, 2009).

Uniforms in LUSD-SW

According to Gentile and Imberman, a survey of a large urban school district (LUSD) was conducted. They were startled at the results. Essentially, “Initially, only a handful of schools required uniforms. However...uniform adoption grew substantially over the following 13 years. Of schools that responded to our survey of uniform policies...only 10% required uniforms in 1993. By 2006, 82% of these schools and 80% of students in these schools had required uniforms” (Gentile 2009).

Methods

Effectively, they discovered a main concern with analyzing the effects of school uniforms on student outcomes to be that schools and districts choose whether or not to adopt uniforms. They found that this decision is likely based, at least in part, on the school or the district’s existing levels of student behavior and achievement.

Because of this, conducting a simple regression that compares schools with uniforms to those without uniforms would be biased. “The availability of panel data where schools adopt uniforms at different times and students move between schools with and without uniforms provides allows us to use student and school fixed effects to address this concern” (Gentile & Imberman, 2009). Thus, this procedure accounts for any unobserved characteristics of students and schools that may affect the school’s decision to adopt uniforms, the parents’ decision to move their child to a school with uniforms and student outcomes, as long as these characteristics do not vary over time.

Data

In this paper we utilize two sources of data from a large urban school district in the southwest. The first dataset includes administrative records for students in LUSD from 1993 through 2006. This data includes student demographics, test scores, disciplinary records and attendance records for every student in LUSD. Testing data include students’ scaled scores on the Stanford Achievement Test which we standardized within grade and year and is available starting in 1998. Discipline data includes any infraction that results in an in-school suspension or more severe

punishment. Attendance records include the attendance rate for each student.

Unfortunately, LUSD does not keep centralized records of when schools adopted uniforms. Thus, we emailed and mailed a survey to each school in LUSD with the following questions in the fall of 2007:

- Does your school currently require students to wear uniforms?

Note that I define a uniform as any outfit where a particular style of shirt (i.e. polo) and bottom (i.e. khaki, skirt, etc.) and a specified color are required.

- If your school currently requires uniforms, what school year did you first require them? Were there any years since then when the requirement was suspended?

- If your school currently does not require uniforms, did you ever require them in the past, and if so, could you please provide the years during which students were required to wear uniforms?

(Gentile & Imberman, 2009).

The schools were also given the option to not provide any information. After, follow-ups via telephone with any school that did not respond to the initial survey were

conducted. During conversation, they were asked for clarification for schools that did not give specific years of uniform adoption. If the principal did not know the date then he or she was requested to ask their staff members. Gentile and Imberman completed their data collection in October, 2008. Interestingly, “For the 292 schools that were in operation in the 2007-08 school year 79% were able to provide dates of uniform adoption while the date could not be determined for 14% and 7% of the schools refused to participate in the survey...Since our survey was based on schools existing in 2007-08 earlier years have higher rates of unknown uniform status than later years. Nonetheless, it is clear that uniforms gained substantially in popularity over the course of the sample” (Gentile & Imberman, 2009).

Gentile and Imberman had to take into account the possibility of schools adopting uniform policies during their data collection. They found that, “From 1994-05, the second year for which we have discipline and attendance data, to 2006-07, 168 schools adopt uniforms. From 1999-00 through 2006-07, the period after the first year of testing data, 96 schools adopt uniforms” (Gentile & Imberman, 2009). Thus there is substantial variation in policies during the period for which we have data.

Conclusively, the essence of this paper is to assess whether requiring uniforms in schools affects student outcomes using administrative data from a large urban school

district in the southwest. Regressions including school fixed-effects, student fixed-effects, and school specific linear time trends were conducted. Overall, Gentile and Imberman found that uniforms appear to have a moderately positive impact on students in middle and high school and little impact on elementary students. “Students in middle and high school grades who are required to wear uniforms show improvements in scores on language exams of between 0.02 and 0.04 standard deviations and improvements in attendance rates of between 0.2 and 0.4 percentage points” (Gentile & Imberman, 2009).

Research by Gentile and Imberman (2009) reported, “Increases in disciplinary infractions in levels models that are concentrated in boys and some small drops in Hispanic reading scores [were found].” Their explanation for this occurrence was that it was possible that the increase in disciplinary infractions was due to uniform violations or increased enforcement, but the lack of a similar increase for girls suggests that the latter is unlikely.

Are Uniforms a Good Fit?

In Ryan Yeung’s article, “Are Uniforms a Good Fit?” uniforms are put under scrutiny and forced to prove themselves under his study and analysis. The purpose of the study is to determine whether or not there is a correlation between school uniform

policies and achievement. Using both personal research and studies conducted by others, his study went as follows:

This study uses two empirical approaches to overcome the impediments...and hence enhance the internal validity of the analysis. First, this analysis relies upon a “value-added” estimation strategy, which has been used frequently in the economics of education literature to mitigate potential bias resulting from omitted variables. Second, this study conducts analyses based on two data sources: the Early Childhood Longitudinal Study-Kindergarten Class (ECLS-K) as well as the National Education Longitudinal Study (NELS) to determine if results are robust across datasets and grade levels, which indeed is what is found.

Immediately, Yeung states that after controlling for prior year test scores and other variables, the results are remarkably consistent across datasets, across specifications, across subject areas, and across grade levels. He finds there to be little to no evidence that school uniforms raise achievement. In fact, he goes so far to say that the impact appears to be negative. “Overall children in schools with mandatory school uniform policies appear to perform worse than their peers in similar schools without mandatory school uniform policies” (Yeung 2007).

ECLS-K

There are two sources of data for this study, both published by the National Center for Education Statistics (NCES). The first is the Early Childhood Longitudinal Study-Kindergarten Class. The ECLS-K is a nationally representative cohort of children beginning in their Kindergarten year in the fall of 1998-99. All together, six waves were conducted with the final wave taking place in the Spring of 2004, when the children were attending fifth grade. The survey used a multistage probability sample design to select the schools and students sampled (Tourangeau, Nord, Le, Pollack, & Atkins-Burnett, 2006, cited in Yeung, 2007).

The two dependent variables from the ECLS-K used in this article are the third grade reading and mathematics t-scores. The t-scores are measures of ability based on performance on standardized examinations rescaled to a mean of 50 and standard deviation of 10. A score of 50 indicates that a child is performing at a level comparable to the national average. Brief details on the next study conducted are as follows:

NELS

As with the ECLS-K, the National Education Longitudinal Study of 1988 is a nationally representative sample sponsored by the NCES. Unlike the ECLS-K, the focus of the NELS is children in secondary school. 25,000 students were selected in the base year (Spring of 1988) through the use of a clustered, stratified national probability sampling technique when the children were in the 8th grade. The fourth and final wave was conducted in the year 2000, when the subjects were 26 years old and out of high school if not college or graduate school (Curtin, Ingels, Wu, & Heuer, 2002, cited in Yeung, 2007). There are 7,930 observations used in this analysis.

With all of this, results and conclusions were soon drawn. It is very clear in his conclusion that Mr. Yeung does not find the idea of school uniforms thrilling or compelling in any fashion. He clearly states his opinion to be that there is a general sentiment that American schools are “broken.” Various reforms have been proposed over the decades focusing on districts, schools, and students. He has noted that one of the most common solutions to this “problem,” is the introduction of school uniforms. The frustrating point of contention for Yeung is that despite the enthusiasm of proponents and

a long literature of qualitative research, the quantitative research on school uniforms has been relatively sparse by comparison.

Conclusively, econometric analyses that control for the previous performance and ability of students, thereby reducing the possibility of bias were conducted. Interestingly, research by Yeung (2007) finds the results to be remarkably consistent across both sets of data and support one general conclusion: there is little evidence that uniforms improve achievement in schools.

CHAPTER 4

COURT CASES

As expected, many battles for and against uniforms took place in the courtroom.

Under the First Amendment, freedom to express one's individuality within the strict guidelines of his or her school's dress code policies was often left to the Supreme Court to decide. Of course, since the 50s there have been hundreds, if not thousands of court cases relevant to this topic; however two, in particular, are *Tinker v. Des Moines Independent Community School District* and *Canady v. Bossier Parish School Board*. Once again, only Supreme Court cases were used in this literature review as they can be argued as being the most influential.

Tinker v. Des Moines

In the case of *Tinker v. Des Moines*, petitioners John F. Tinker, 15 years old, and Christopher Eckhardt, 16 years old, attended high schools in Des Moines, Iowa. John Tinker's sister, another petitioner, was a 13-year-old student in junior high school.

In a nutshell:

In December 1965, a group of adults and students in Des Moines held a meeting at the Eckhardt home. The group determined to publicize their objections to the hostilities in Vietnam and their support for a truce by wearing black armbands during the holiday season and by fasting on December 16 and New Year's Eve. Petitioners and their parents had previously engaged in similar activities, and they decided to participate in the program.

The principals of the Des Moines schools became aware of the plan to wear armbands. On December 14, 1965, they met and adopted a policy that any student wearing an armband to school would be asked to remove it, and if he refused he would be suspended until he returned without the armband. Petitioners were aware of the regulation that the school authorities adopted.

On December 16, Mary Beth and Christopher wore black armbands to their schools. John Tinker wore his armband the next day. They were all sent home and suspended from school and told not to return until they would come back without their armbands. Unfortunately, they did not return to school until after the planned period for wearing armbands had expired, after New Year's Day.

This case was filed in the United States District Court by the petitioners, through their fathers where it eventually made it all the way to the Supreme Court. Here, the issue was tossed back and forth until finally coming to the conclusions that, “While the record does not show that any of these armband students shouted, used profane language, or were violent in any manner, detailed testimony by some of them shows their armbands caused comments, warnings by other students, the poking of fun at them, and a warning by an older football player that other, nonprotesting students had better let them alone. There is also evidence that a teacher of mathematics had his lesson period practically ‘wrecked’ chiefly by disputes with Mary Beth Tinker, who wore her armband for her ‘demonstration.’ Even a casual reading of the record shows that this armband did divert students' minds from their regular lessons, and that talk, comments, etc., made John Tinker ‘self-conscious’ in attending school with his armband” (Tinker v. Des Moines Independent Community School District). Thus, the United States District court refused to hold that the state school order violated the First and Fourteenth¹ Amendments.

¹ U.S. Constitution Fourteenth Amendment: Section 1. All persons born or naturalized in the United States and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws. *See reference page:* Elbel, Fred

Canady v. Bossier Parish School Board

In the case of Canady v. Bossier Parish School Board, “In 1997, the Louisiana Legislature amended section 17:416 of the Louisiana Revised Civil Statutes to allow parish school boards the discretion to implement mandatory uniforms, provided the school board gives the students' parents written notice explaining the dress requirements.”

As expected, this did not go well with many parents. Parents of affected children who felt as though the school was overstepping its legal rights soon sought legal action.

The case went as follows:

In the 1998-1999 school year, the Bossier Parish School Board required sixteen of its schools to adopt mandatory uniforms in order to determine the effect of the uniforms on the learning environment. After receiving favorable results, the School Board implemented mandatory school uniforms in all of the parish public schools beginning with the 1999-2000 school year. The average uniform consisted of a choice of two colors of polo or oxford shirts and navy or khaki pants. The schools alerted parents by letter about the dress specifications, provided a list of

local vendors supplying the required clothing, and displayed an example of the uniform at each school.

Several parents of students in the Bossier Parish School System filed this suit in federal court seeking an injunction against the schools' enforcement of the uniform policy. The parents claimed that the dress code violated their children's First Amendment rights to free speech, failed to account for religious preferences, and denied their children's liberty interest to wear clothing of their choice in violation of the Fourteenth Amendment.

Both the parents and the School Board filed for summary judgment. The parents presented affidavits arguing that their children's constitutional rights were violated and that the School Board's reasons for implementing the uniform policy were unfounded. The School Board offered affidavits of school teachers and principals who concluded that the uniform policy reduced behavior problems and increased test scores. The school officials recounted statistics showing the reduction in disciplinary actions and rise in test scores after the School Board adopted uniforms (Canady v. Bossier Parish School Board).

Eventually, the district court entered summary judgment in favor of the School Board based on the affidavits presented. It was the court's decision and conclusion that the mandatory uniform policy did not violate the student's First Amendment rights and that the summary judgment evidence did not raise a genuine issue of material fact concerning the effectiveness of the uniform policy.

Sissy Littlefield v. Forney Independent School District

In the case of Sissy Littlefield v. Forney Independent School District, the Plaintiffs, individual students and parents of students in the Forney Independent School District, sought an appeal of the district court's grant of summary judgment in favor of the Defendants, Keith Bell, Kenneth Cleaver, Clarence Doggan, Jay Calvin, Jim Jacobs, Rick Townsend, David Walker, and Chester J. St. Clair. The case was centered around the Plaintiffs suing the Defendants on several constitutional challenges to the mandatory school uniform policy. It was an interesting case in that it involved three different claims presented by the Plaintiffs. The case of Sissy Littlefield v. Forney Independent School District went as follows:

In the spring of 1999, Forney, acting pursuant to Texas Education Code 11.162 adopted a district-wide mandatory Uniform Policy applicable to its students. The Uniform Policy apparently originated as a result of the

efforts of General Superintendent St. Clair, who observed the successful implementation of uniform policies employed in other Texas school districts. In addition to St. Clair, school board members and school officials conferred with their counterparts at other Texas public schools and reviewed studies on the efficacy of school uniform policies. As found by the district court,

St. Clair came to the conclusion that the implementation of a school uniform program would, according to his research, have the following beneficial effects on the students and the system as a whole: improve student performance, instill self-confidence, foster self-esteem, increase attendance, decrease disciplinary referrals, and lower drop-out rates.

The Forney School District attained input from parents regarding the policy proposal. They sent a take-home survey home with elementary, middle, and junior-high school students in March 1999 in order to gain parental approval of the policy. It was to the district court's surprise that, of the thirty-four percent of parents who responded, approximately sixty percent of that group was in favor of mandatory uniforms. Additionally, the Forney Independent School District conducted two town-hall meetings

concerning the proposal. At these meetings, parents were provided the opportunity to comment on the policy proposal. This is what took place after these meetings:

As a result of this information, the Forney School Board made factual findings that the school uniforms would improve the learning environment at the schools, and on April 19, 1999, adopted the Uniform Policy now at issue. The Uniform Policy applied to all 2,500 students in each of the schools within the district and was implemented at the beginning of the 1999-2000 school year.

The disputed Uniform Policy requires students to wear solid color polo-type shirts with collars, oxford-type shirts, or blouses with collars in one of four colors (white, yellow, red, or navy blue). The shirts may be either short or long-sleeved but must be tucked in at all times. Students must also wear either blue or khaki colored pants, shorts, skirts, or jumpers. The shorts and skirts must be of appropriate size and length (no shorter than three inches above the knee). The Policy prohibits the wearing of, inter alia, denim, leather, suede, or vinyl, or any clothing that suggests gang affiliation, could conceal contraband, or could create a distraction. Certain other clothing items are also banned, such as open-heeled sandals,

flip-flops, military boots, overalls, athletic pants, spandex, baggy clothing, and sleeveless shirts. The Uniform Policy also regulates the sizes of manufacturer logos permitted on clothing. Prior to the adoption of the Policy, Forney had a dress code that prohibited certain types of clothing deemed unsafe, immodest, or otherwise inimical to the educational process (*Sissy Littlefield v. Forney Unified School District*).

The Forney Unified School District asserted that the uniform policy was adopted to promote school spirit and school values. They also intended for it to promote decorum by creation the notion that school is a place of order and work. They hoped that this would promote respect for authority, decrease socioeconomic tensions, increase attendance, and reduce drop out rates. Forney also asserted that it hoped the policy would increase student safety by reducing gang and drug related activity as well as the likelihood of students bringing weapons to school undetected. This would also allow teachers to more readily distinguish Forney students from outsiders.

Essentially, a failure to comply with the uniform policy resulted in disciplinary actions, which could lead to expulsion. The district court found that the parents of seventy-two students sought exemptions from compliance with the policy. Only twelve exemptions were granted. Funny enough, most students who had based their objections on

philosophical or religious grounds were denied exemptions because they had worn some type of uniform in the past.

The Plaintiffs-Appellants brought three separate, substantive constitutional challenges to the Uniform Policy:

First, the student-Plaintiffs-Appellants subject to the Uniform Policy assert that the compulsory wearing of uniforms violates the First Amendment because the wearing of uniforms is both a form of coerced speech, in that, it compels them to express ideas with which they may not agree, and, at the same time, it is an infringement on free expression, in that it prevents them from freely expressing particular messages they do wish to convey. Second, the parent-Plaintiffs-Appellants claim that the compulsory Uniform Policy violates their "fundamental" right to control the upbringing and education of their children in violation of the Fourteenth Amendment. Finally, four family-Plaintiffs-Appellants (parents seeking relief on behalf of their children), who sought exemption from the Uniform Policy on religious grounds, allege that the existing opt-out procedures restrict their freedom to exercise their religious beliefs in violation of the Free Exercise Clause of the First Amendment because the

opt-out questionnaire and hearing procedures impermissibly delve into the substance of their religious beliefs. Further, these four family-Plaintiffs-Appellants contend that the opt-out procedures favor certain established religions at the expense of other religions and thus violate the Establishment Clause of the First Amendment (*Sissy Littlefield v. Forney Unified School District*).

Eventually, the Defendants filed a motion to dismiss under the Federal Rule of Civil Procedure. Then, moved for summary judgment based on qualified immunity. The district court ended up treating the motion to dismiss as a motion for summary judgment and granted summary judgment in favor of the Defendants. They concluded that there was no constitutional violation in this case.

Robert Blau v. Fort Thomas Public School District

In the case of *Robert Blau v. Fort Thomas Public School District*, Robert Blau challenged the constitutionality of a dress code regulation imposed by his daughter's school. The regulation was adopted in 2001 at Highlands Middle School, located in Fort Thomas, Kentucky. Soon after its adoption, on behalf of his daughter, Amanda Blau, then in the sixth grade at Highlands Middle School, and himself, Robert Blau challenged the constitutionality of the regulation, claiming that it violated Amanda's First

Amendment right to freedom of expression, her substantive-due-process right to wear the clothes of her choosing and Robert's substantive-due-process right to control the dress of his child. This was an interesting case in that the parent suing the school district was a lawyer, himself. The case went as follows:

Highlands Middle School includes students in the sixth, seventh and eighth grades and is part of the Fort Thomas Public School District. Under Kentucky law, each school district has a governing school board and each school has a Site Based Decision Making Council consisting of two parents, three teachers and the school's principal. The Council has responsibility for setting school policy that is consistent with the school board's policies and that is designed to "provide an environment to enhance the students' achievement and help the school meet [its] goals."

On May 15, 2001, at a meeting of the Highlands Council, several parents proposed a dress code for the school to "create unity, strengthen school spirit and pride, and focus attention upon learning and away from distractions." The proposal relied on other school districts' findings that dress codes had "enhanced school safety, improved the learning environment, promoted good behavior, reduced discipline problems,

improved test scores, improved children's self-respect and self-esteem, bridged socio-economic differences between families, helped eliminate stereotypes and produced a cost savings for families" (Robert Blau v. Fort Thomas Public School District).

On May 22, 2001, Highlands principal Mary Adams sent a letter to all Highlands students and their parents about the dress code proposal and set up a meeting to discuss it. Amanda and several other Highlands students and their parents attended the meeting. After, the Council formed a committee consisting of two council members, two teachers, four parents and four students (including Amanda Blau) to make proposal recommendations about the proposal. The committee gathered feedback and made modifications to the proposal. They even eventually proposed a dress code for the middle school, which the Council adopted on August 21, 2001.

Robert Blau, a lawyer filed an action against the Fort Thomas Public School District on his and Amanda's behalf in federal court on November 21, 2001. The lawsuit sought injunctive and monetary relief and invoked 42 U.S.C. 1983, the First and Fourteenth Amendments of the United States Constitution and certain sections of the Kentucky Constitution. Claiming that the crux of her opposition to the dress code stemmed from her new-inability to wear "clothes that looked nice on her," the Blaus'

case began to lose credibility. Additionally, Amanda Blaus stated that there was no particular message that she wished to convey through her clothes. Never claiming that the dress code was incompatible with any religious beliefs or anything of similar severity, the Blaus did not stand a chance in court. This is how the case was resolved:

Before the 2002 school year had begun and while this lawsuit was pending, the Highlands Council modified the dress code. The amendment loosened the dress code in some respects (pants, shorts or skirts may be any solid color, and striped and patterned tops are permitted) and tightened it in others (blue jeans are prohibited, "clothing that promotes drugs, alcohol, tobacco, sex, or is offensive or degrading" is prohibited and tops with "low, scoop, plunging or revealing necklines" are prohibited.

In granting the school district's motion for summary judgment, the district court rejected each of the Blaus' claims with respect to the first version of the dress code and the Blaus' one claim with respect to the second version of the dress code — the ban on blue jeans. It held that the dress codes did not violate Amanda's First Amendment right to freedom of speech, that there is no fundamental right under the Fourteenth Amendment to wear the clothes of one's choosing to public school and

that a parent's fundamental right under the Fourteenth Amendment to control the education of his or her child does not bar a school district from adopting a reasonable dress code. The district court also determined that the Blaus were afforded procedural due process, that the Council did not exceed its statutory authority in enacting the code and that the Council's actions did not violate the Kentucky Open Meetings Act. The Blaus seek an appeal of the district court's decision (*Robert Blau v. Fort Thomas Public School District*).

Jacobs v. Clark County School District

In the case of *Jacobs v. Clark County School District*, the parents of Kimberly Jacobs, an eleventh-grader at Liberty High School (Liberty, for short), sued their school district for imposing uniform policies on their daughter. The case was interesting in that it involved a student who was classified as a repeat-offender of the dress code. It is very interesting to see how this affected the case. The case of *Jacobs v. Clark County School District* went as follows:

In 2003, the Clark County School District ("the District") promulgated Regulation 5131 ("the Regulation"), which created a standard dress code for all Clark County students and established a means by which

individual schools in the District could establish more stringent mandatory school uniform policies. These uniform policies were to be established "for the purpose[s] of increasing student achievement, promoting safety, and enhancing a positive school environment."

A number of schools in the District instituted such uniform policies. For example, Liberty High School ("Liberty") instituted a policy requiring all students to wear "solid khaki-colored bottoms and solid-colored polo, tee, or button-down shirts (blue, red or white) with or without Liberty logos." Kimberly Jacobs ("Jacobs"), then an eleventh-grader at Liberty, repeatedly violated Liberty's uniform policy (at least once by wearing a shirt containing a printed message reflecting her religious beliefs). As a result of these violations, Jacobs was repeatedly referred to the Dean's office and was ultimately suspended from school five times for a total of approximately twenty-five days. Although Liberty provided Jacobs with educational services during her suspensions — and, in fact, Jacobs's grade point average improved during that time period — Jacobs claims that she missed out on classroom interactions, suffered reputational damage among her teachers and peers, had a tarnished

disciplinary record, and was unconstitutionally deprived of her First Amendment rights to free expression and free exercise of religion because of Liberty's enforcement of its mandatory school uniform policy (Jacobs v. Clark County School District).

Jacobs and her parents soon brought suit against the District and various individual defendants. They were asking the court to: declare N.R.S. 392.458, the Regulation, and Liberty's mandatory school uniform policy unconstitutional as violating the First Amendment's Free Speech and Free Exercise clauses, as well as the Fourteenth Amendment's Due Process Clause. They also wanted to expunge all related discipline actions from Jacobs's record; and award her adequate and appropriate damages. The district court granted Jacob's motion for a preliminary injunction and prohibited Liberty from further disciplining or suspending Jacobs for failing to adhere to the uniform policy. After this decision, the District slightly amended the Regulation. Additionally, Liberty expunged all uniform-related discipline from Jacobs's record.

Encouraged by Jacobs's success in obtaining a preliminary injunction — and concerned about the suit's viability after Jacobs had withdrawn from Liberty and moved to a new school district — a number

of other District students and their parents (collectively, "Plaintiffs")

joined the suit (*Jacobs v. Clark County School District*).

Essentially, after the Defendants moved to dismiss the Plaintiffs' amended complaint. The district court advised the parties that the Defendants' motion might be construed as one for summary judgment. Additionally, after the parties complemented the record accordingly, the district court struck two provisions of the Regulation. Besides that, the district court granted summary judgment in favor of Defendants. They found no other constitutional infirmity with the Regulation, or the individual schools' uniform policies.

CHAPTER 5

SUMMARY OF FINDINGS & CONCLUSIONS

In conclusion, on paper, the requirement of school uniforms appears to be very promising. As discovered, the results are decidedly mixed. Even though some public school systems have noticed significant improvements since implementing a school uniform program, others have discovered that enforcement of the policy can be very challenging in the long-term. Resources once spent on the direct education of the students are now being split and redirected towards enforcing dress codes and policies. Parents' involvement can also play a negative role. Lawsuits against school boards and districts add to the ever-growing amount of resources spent on issues not directly related to the education of the students. Additionally, valuable teaching and instruction time is spent reprimanding students and checking for dress code compliance.

CHAPTER 6

IMPLICATIONS

Thus, instead of requiring uniforms, many school systems are considering other alternatives to limiting the achievement gaps and distractions. These include same-sex classrooms and classes that do not operate on a grade-system, instead students matriculate through coursework at their own pace towards automatic promotion to higher grades. As one can imagine, these alternatives come with their own sets of pros and cons. Finding solutions to the problems posed by students and school systems can be overwhelmingly difficult to develop. Working with humans creates a very dicey environment in which much care, caution, and concern should be taken in order to avoid unethical actions. It is seemingly impossible to find a solution free of counter-arguments and cons. Therefore, it can be effectively decided that there is no correlation between uniforms and any change in student behavior. Whether or not they should be adopted as a practice should be up to the individual school districts, parents, and students, until more definitive evidence supporting or disapproving uniforms as a mandatory practice is found.

Proposal for Further Research

Although uniforms should be accepted and used more often, further research should be conducted in order to determine their true worth. I propose that educational research push for a revamping of its research limitations. If the limitations are lifted, perhaps a proper research study, unquestionable in its discovery, can be conducted. How this can be done seems an overwhelming and daunting endeavor; however, I am confident it can be done.

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