

The appropriate use of sacred music in the public school curriculum is an issue that music educators continually encounter. While the artistic and curricular value of teaching with sacred music may seem obvious to those in the music education community, communicating its value to others—whether in reference to a specific piece or about sacred music generally—is not always easy or comfortable. This article contains information about the law and relevant court rulings, and provides resources that can be used to further educate yourself on this topic, and refer others to when necessary. It also contains concrete strategies for using sacred music appropriately and successfully in your school’s music program.

Can We Use Sacred Music?

According to the law, sacred music can be used in the public school music curriculum. The First Amendment does not prohibit the use of religious or sacred material in the public school. Yet while material of a religious or sacred nature can be appropriate for study, not all possible uses of sacred music are appropriate. How the material is used determines whether or not it is legally acceptable. Sacred music should not be used for the advancement of any particular religious viewpoint or activity. Further, instructional materials should not be used to inhibit or infringe upon religious beliefs or practices.¹ While we often think of this issue in terms of foisting religious beliefs upon someone who has none, this law is also relevant when someone with strong religious convictions may be asked to participate in something that is contrary to their firmly-held beliefs.

The first court case that dealt specifically with music was *Florey v. Sioux Falls School District 49-5* in 1978, in which a parent who was an atheist objected to the use of “Silent Night”

¹ Additional guidelines for the use of religious or sacred materials can be found in Chief Justice Warren E. Burger’s opinion in *Lemon v. Kurtzman*, 403 U.S. 602, 612. (1971).

in a school Christmas program, arguing that its use violated the separation of church and state. The district's policy, which allowed the use of sacred material for educational purposes (not for the promotion of religion), was upheld by the 8th U.S. Circuit Court of Appeals.

In 1995, a U.S. District Court dismissed the case of *Bauchman v. West High School*, in which a 15-year-old student objected to the use of Christian songs claiming that they were sung prayers. The court found that "music has a purpose in education beyond the mere words or notes in conveying a mood, teaching cultures and history, and broadening understanding of arts."² All other court cases that have challenged the use of sacred music have been equally unsuccessful. The necessity of public schools to remain religiously neutral, while not restricting the appropriate use of religious materials has been emphasized repeatedly.

James Panoch provided a helpful overview of the legal rulings on this matter, setting appropriate and inappropriate uses of religious materials in contrast (see figure 1).³ From this summary, it is clear that the way in which religious materials are used determines their appropriateness within the public school classroom.

In 1984, MENC: The National Association for Music Education adopted a position statement about the use of sacred music in the schools (see figure 2). Having undergone slight revision in 1996, the entire statement, along with a substantial list of resources on the topic, can be found on their website at www.menc.org/publication/books/relig0.html. This information is also available in brochure form. Other organizations, including the Freedom Forum First Amendment Center (www.freedomforum.org), offer additional relevant materials.

² From *Music with a Sacred Text* [brochure], Reston, VA: Music Educators National Conference, 1996, pp. 2-3.

³ Excerpt taken from "Sacred Music: How to Avoid Cooking Your Holiday Goose," *Music Educators Journal*, 71(3), 1984, pp. 31-33, quoting Bracher, Peter, James V. Panoch, Nicholas Piediscalzi, and James K. Uphoff. *PERSC Guidebook Public Education Religion Studies; Questions and Answers*. Dayton, OH: PERSC/Write State University, 1984.

Sacred Music in the Classroom

In accordance with the First Amendment and court rulings, sacred music can be used in a religiously neutral manner as a part of standard educational practices. As a matter of curricular content in our subject, sacred music exemplifies:

- Music practices of various historical periods. In fact, sacred music is often the best example of music within specific time periods. It has often been observed that prior to the 17th century, almost all significant choral music contained sacred text, primarily because most notable composers were trained and employed by the church. To be historically accurate and representative, including sacred music is necessary.
- Musical practices of various cultural traditions. Study of a particular culture is not complete without an examination of its music, including a study of performance practice and use of music within the cultural traditions. Religious traditions play significant roles in every culture, and therefore the music associated with these observances are subject for study as well.
- A variety of musical styles and genres. To provide a complete educational experience, as recommended by MENC's statement, exploration through the performance of all styles and genres is necessary. By definition, a motet contains a sacred text; and it is practically impossible to locate an African-American spiritual that is not in fact *spiritual* in nature.

Further, to have a complete understanding of these genres, cultures, and historical periods, discussion of the situations surrounding the conception and performance of the music is required. Students need to be able to connect information about society and history to art forms of the time.

Using Sacred Music Responsibly

Knowing that legally we have “permission” to use sacred music does not necessarily give license to use it indiscriminately. Being informed and making wise decisions are actually the most effective ways to avoid the need to apply this information in a confrontational and uncomfortable situation. The first way to do this is to inform ourselves about the population we serve. Investigate your district’s policy on the use of religious materials. This may give you an indication of how tolerant your community is about this subject. It may also be enlightening to discover the views of your local school administrators. With this information, you should be able to gauge the kind of support they will automatically be willing to give you, should the need arise.

If you do not have a good feel for this already, find out the general religious make up of your student body. This is important not only for enabling you to represent the various traditions of your constituency, but also for exposing them to traditions that might not be represented within your student body.⁴

In addition to being informed, it is also very important to stay as objective as possible when making decisions and communicating with others. This is a volatile topic—one in which many personal feelings are invested. Approaching the subject emotionally or based on individual beliefs can be very unwise, in that you may find yourself advocating the use of a piece of music based on your own personal enjoyment or aesthetic perceptions, which may or may not be religiously neutral. Instead, keep the conversation focused on the educational value of the piece and its role within your curriculum as a whole.

Playing It Smart

Above all, make wise choices when selecting literature. There is a vast amount of high quality sacred music that has enormous educational value. As music educators, we advocate the

⁴ For additional suggestions about relating to your school community, see R. Pennock’s “Getting a handle on the holidays,” *Principal*, 71(2), 1991, 35-36.

use of this music precisely because it is so excellent. At the same time, there are a lot of pieces out there (sacred and secular) that are not high quality and do not contain significant educational value. Pieces that lack rich musical content or are obviously and primarily devotional in nature should not be used in your curriculum. Don't cause someone to challenge the use of the really good stuff by including something that doesn't merit our educational attention.

When it comes to selecting literature, the same procedures should apply for sacred and non-sacred literature. Quality is quality. Select music on its musical merits, so that if challenged you can easily defend your choices. Rather than apologetically defending literature selections, boldly tout the qualities of the piece that make it exciting and important to study. Be able to identify the content that satisfies your curricular objectives. Are there harmonic elements that are signature features of the piece? Is it written in a meter you have yet to introduce? Can it teach modulation? Do the canonic entrances teach a formal structure that promotes balance across the ensemble? The list goes on and on.

Further, while almost any piece could be used to teach fundamental music reading skills, select literature with identifiable examples of artistic quality. Is the melodic line pleasing or beautiful? Is it well written for a particular voice part or instrument? Is there a satisfying sense of tension and release? Are there excellent examples of text painting within the voices or accompaniment? Although it may be more difficult to articulate to those who do not share your level of appreciation for musical composition and performance or possess as thorough musical vocabulary, it is important to be able to do so.

Look at Your Whole Program

Beyond the considerations given to an individual musical selection, consider each piece within the framework of an entire concert program. For each concert, is there a balance of

historical periods, subject matter, and cultural influences? Would the program content give reason for someone to take offense? If you choose to present a themed concert with a special focus (e.g. an all Bach concert), consider the balance issue within the larger framework of an entire school year. Also, take a look at the programming of individual ensembles throughout the year. While there may be balance in each concert, it may be that an individual group may be performing the same style or period each time. Other groups may have almost exclusively sacred selections, while others have almost none.

Literature selections can also be dictated by events or emphases taking place in the larger school community. Certainly music selected within the scope of these type of collaborative activities (e.g. music with texts of a specific poet or group poets) are considered educationally valuable for many reasons.

Communicate the Value

Once literature choices have been made, it is up to you to use the musical materials in an educationally valuable way and to communicate the value to all of your constituents—students, fellow teachers, parents and the community, and administrators:

- As with any piece, identify its musical merits and then communicate them to your students. Let them know and help them to articulate the musical tasks they are mastering by performing the repertoire. They can do an enormous part of the PR work for you.
- Educate your audiences at your concerts. Provide program notes, giving them something to consider beyond the topic of the text, in and of itself. Extend the learning by having your students research the music, the composers, the poets the style periods, etc. and then write the notes themselves. This can also be a great way to create interdisciplinary

connections between yourself and your fellow faculty members. There are unlimited possibilities for communicating the musical value of all of the repertoire, sacred or not.

- Use your newsletter or website to communicate with parents and community. Articulate the musical goals for an upcoming concert or for the year. Compose a mission statement for your program that addresses the musical content gained through performance. Use your advertising opportunities—posters, announcements, press releases—to share about an upcoming concert, particularly if it has a theme. In all these ways, *you* are setting the agenda and proactively communicating what you want them to know.
- Communicate with your administration about the content of your programs and your curriculum. Nothing upsets administrators more than being taken off-guard or being made to look as if they don't know what's going on in their own buildings.

Finally, remember that these are guidelines that you can follow to be safely within the laws and legal precedents for public education. But also remember that every student is an individual. While a single student's beliefs cannot or should not prevent you from using the literature that you believe is best for the education of all of your students, it may also be wise to accommodate a student with particularly strong beliefs, providing that it is not disruptive to your overall program. Making allowances for an individual student in a situation of real conflict demonstrates an appropriate level of tolerance and a value for that student as a person, demonstrating that the musical material, regardless of its religious content, is not more important than the students we are here to serve.

Figure 1. Paraphrased from James Panoch in “How to Avoid Cooking Your Holiday Goose,” *Music Educators Journal*, 71(3), p.33.

Schools can:

Sponsor **study about** . . .

Expose students to . . .

Instruct . . .

Educate about . . .

Approach study **educationally**

Provide **awareness** of . . .

Inform students about . . .

Schools cannot:

Sponsor the **practice of** . . .

Impose upon students . . .

Indoctrinate . . .

Convert to . . .

Approach study **devotionally** . . .

Promote **acceptance** of . . .

Conform students to . . .

. . . specific religious beliefs and practices.

Figure 2. Statement concerning the use of sacred music from MENC: The National Association for Music Education

“It is the position of the Music Educators National Conference that the study and performance of religious music within an educational context is a vital and appropriate part of a comprehensive music education. The omission of sacred music from the school curriculum would result in an incomplete educational experience.”

From “Music with a Sacred Text”

Reston, VA: MENC, 1996