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Editor's Note

LILLIAN LODGE KOPENHAVER
Associate Editor

One of the greatest challenges facing college media advisers is having the knowledge and understanding of the legal ramifications of their jobs as advisers and mentors and guides to the student journalists who produce student media on their campuses.

Beyond the salient phrase from the 45 words which make up the First Amendment of the Bill of Rights to the U.S. Constitution, that "Congress shall make no law abridging… freedom of speech, or of the press" lies a vast body of case law relating to the jobs that advisers do daily. Many grapple with decisions and interpretations as they teach and advise students about how to handle issues and stories that come up in producing a fair and accurate news report.

In this issue, David Wheeler from the University of Tampa provides the best summary I have seen of federal student press law cases at the university and college level in a readable, understandable article that should be required reading for anyone working in post-secondary student media. Aptly entitled "Don't Press the Panic Button Yet," it is our lead article in this volume. Reading it should make advisers, and their students, more confident about what they do and what they can do. It should be a text in every newsroom.

We are all well aware that student media on private college campuses face issues that their colleagues on public universities do not, and that much of the law that protects public institutions does not relate to and protect those at private colleges. Matthew Salzano and Joanne Lisosky of Pacific Lutheran University in their article, "Journalism as a Conversation at the Private University," suggest that even though there is not necessarily a clear idea of "who is obligated to be the teller of unsavory truths" on the campus of a private university, student media

must often "take up the torch." They put forth the interesting idea of the creation of an alternative public sphere on the private university campus which permits a robust conversation about issues and turns on the light to the truth. They suggest that other advisers might benefit from this approach.

Our final article, "The Digital Generation Gap: How Student Journalists Transition from Personal to Professional Uses of Mobile Devices and Social Media," by Jean Reid Norman of Weber State University, touches on the digital divide that may exist when new folks enter the newsroom and the types of training programs that advisers may need to plan for staff members so this generation of student journalists can take the technology they grew up with and learn how to use it in their work in student media.

All of the articles in this issue provide advisers with immensely valuable and useful background. So find a bit of time, a comfortable chair and a cool drink, and open your mind to a meaningful few hours of enlightening information that just may make you more confident and refreshed as you move forward.

Wheeler, David. 2017. "Don't Press the Panic Button Yet: An Analysis of Federal Student Press Law Cases at the University Level." *College Media Review*, 54(1), 4-15.

Don't Press the Panic Button Yet:

An Analysis of Federal Student Press Law Cases at the University Level

DAVID R. WHEELER
The University of Tampa

Although some student press advocates are concerned about recent decisions curtailing the speech and press rights of college students, First Amendment protections for postsecondary school students are on much firmer footing than are protections for K-12 students.

THE 1960 AND 1970S: STUDENTS AND EDITORIAL CONTROL

The birth of college press freedom began even before *Tinker*, when an Alabama federal district court in 1967 ruled in favor of a student editor in *Dickey v. Alabama State Board of Education*. In *Dickey*, a disagreement over content in the student newspaper resulted in student editor Gary Dickey's suspension from Troy State University (Dickey, 613). Dickey wrote an editorial commenting on the governor and state legislature's insistence that no articles be published that were critical of them. The president of the university, Dr. Frank Rose, disagreed with this policy, and Dickey wanted to write an article supporting the president. As the court noted:

> It is without controversy in this case that the basis for the denial of Dickey's right to publish his editorial supporting Dr. Rose was a rule that had been invoked at Troy State College to the effect that there could be no editorials written in the school paper which were critical of the Governor of the State of Alabama or the Alabama Legislature. The rule did not prohibit editorials or articles of a laudatory nature concerning the Governor or the Legislature (Dickey, 616).

Dickey was told by his adviser that he could not publish the column. Instead, Dickey decided to run a blank space in place of the article with the word "censored." For this action, Dickey was suspended, and he subsequently took his case to federal court, claiming a violation of his First Amendment rights. In ordering that Dickey be allowed to return to the school, the district court judge said:

> State school officials cannot infringe on their students' right of free and unrestricted expression as guaranteed by the Constitution of the United States where the exercise of such right does not materially and substantial-

> ly interfere with requirements of appropriate discipline in the operation of the school.

For decades after this court decision, university press freedom continued to grow. In fact, Marc Abrams in the book *Law of the Student Press* calls the period after Dickey a "30-plus year winning streak for America's college student media when contesting administrative censorship" (Dickey, 618).

Indeed, three years later, a federal district court in Massachusetts ruled that Fitchburg State College could not require student newspaper content to be approved by an advisory committee before publication in the student newspaper. In *Antonelli v. Hammond*, the court stated:

> Because of the potentially great social value of a free student voice in an age of student awareness and unrest, it would be inconsistent with basic assumptions of First Amendment freedoms to permit a campus newspaper to be simply a vehicle for ideas the state or the college administration deems appropriate. Power to prescribe classroom curricula in state universities may not be transferred to areas not designed to be part of the curriculum (Abrams).

In a continuation of legal protections for university press freedom, the U.S. Court of Appeals for the Fifth Circuit ruled in the 1973 case *Bazaar v. Fortune* that officials at the University of Mississippi could not censor publication of "earthy language" in the school's literary magazine. Circuit Judge Lewis R. Morgan said:

> The University here is clearly an arm of the state and this single fact will always distinguish it from the purely private publisher as far as censorship rights are concerned. It seems a well-established rule that once a University recognizes a student activity which has elements of free expression, it can act to censor that expression only if it acts consistent with First Amendment constitutional guarantees (Antonelli).

The same year (1973), the U.S. Court of Appeals for the Fourth Circuit heard arguments in *Joyner v. Whiting*. In this case, the Echo student newspaper at North Carolina Central University published an editorial urging students to fight efforts to integrate their historically African-American college. The university president tried to withhold funding from the newspaper, citing "standard journalistic criteria" and a lack of content showing "the full spectrum of views" on campus. Whiting wrote the following letter to student editor Johnnie Edward Joyner:

> In my view the September 16 issue of the *Campus Echo* does not meet standard journalistic criteria nor does it represent fairly the full spectrum of views on this campus. Because of this, I am writing to advise that funds for the publication of additional issues will be withheld until agreement can be reached regarding the standards to which further publications will adhere. If consensus cannot be established then this University will not sponsor a campus newspaper. That portion of remaining funds collected or allocated to the Campus Echo budget will accrue to the credit of all contributing students for this school year (*Bazaar*).

The president's attorneys explained to him that because North Carolina Central University is a state institution, he could not refuse to financially support the newspaper. Undeterred, the president halted the paper's financial support and refunded to each student a share of the activity fee allocated to the Echo. As a result, several issues of the Echo were published without the university's financial support, but the paper

ultimately could not survive without its subsidy from student fees.

Circuit Judge John D. Butzner rejected the university's argument:

> Fortunately, we travel through well charted waters to determine whether the permanent denial of financial support to the newspaper because of its editorial policy abridged the freedom of the press. The First Amendment is fully applicable to the states … and precedent establishes "that state colleges and universities are not enclaves immune from [its] sweep." A college, acting "as the instrumentality of the State, may not restrict speech . . . simply because it finds the views expressed by any group to be abhorrent." … It may well be that a college need not establish a campus newspaper, or, if a paper has been established, the college may permanently discontinue publication for reasons wholly unrelated to the First Amendment. But if a college has a student newspaper, its publication cannot be suppressed because college officials dislike its editorial comment" (*Joyner*).

THE 1980S AND 1990S: STUDENTS AND OFFENSIVE MATERIAL

As with the previous decade, the decade of the 1980s was also a positive time for press freedom advocates at the university level. In 1983, the case *Stanley v. Magrath* was decided by the U.S. Court of Appeals for the Eighth Circuit. The dispute began when the University of Minnesota's board of regents were angered over a finals week humor issue of the student newspaper:

> In June 1979 the "Finals Week" edition or "Humor Issue" of the *Minnesota Daily*, styled in the format of sensationalist newspapers, contained articles, advertisements, and cartoons satirizing Christ, the Roman Catholic Church, evangelical religion, public figures, numerous social, political, and ethnic groups, social customs, popular trends, and liberal ideas. In addressing these subjects, the paper frequently used scatological language and explicit and implicit references to sexual acts. There was, for example, a blasphemous "interview" with Jesus on the Cross that would offend anyone of good taste, whether with or without religion. No contention is made, however, that the newspaper met the legal definition of obscenity (*Stanley*).

In a maneuver reminiscent of the Joyner case from the previous decade, the university attempted to change the funding for the student newspaper by allowing students to request a refund of the portion of their student activity fee that went to the paper. Circuit Judge Richard S. Arnold would not allow the university to take such action:

> [The university's] stated reason was solicitude for students who objected to buying a newspaper they did not want. Our study of the record, however, leaves us with the definite and firm conviction that this change in funding would not have occurred absent the public hue and cry that the *Daily*'s offensive contents provoked. Reducing the revenues available to the newspaper is therefore forbidden by the First Amendment, as made applicable to the states by the Fourteenth, and the *Daily* is entitled to an injunction restoring the former system of funding (*Stanley*).

The Circuit Court's decision overturned an earlier ruling by a federal district court, which illustrates that even federal courts can be uncomfortable with the First Amendment's protection of offensive material.

In the 1996 California case *Cohen v. San Bernardino Valley College*, a tenured professor of English brought suit under the First Amendment after he was disciplined for

violating his college's sexual harassment policy by using profanity and discussing sex, pornography, obscenity, cannibalism and other controversial topics in a confrontational, devil's advocate style in class. One student believed the sexual comments, some of which involved consensual sex with children, "were directed intentionally at her and other female students in a humiliating and harassing manner" (Cohen).

The school ordered the professor to:

- Provide a syllabus concerning his teaching style, purpose, content and method to his students at the beginning of class and to the department chair by certain deadlines;
- Attend a sexual harassment seminar within 90 days;
- Undergo a formal evaluation procedure in accordance with the collective bargaining agreement; and
- Become sensitive to the particular needs and backgrounds of his students, and to modify his teaching strategy when it becomes apparent that his techniques create a climate which impedes the students' ability to learn.

Cohen was, additionally, advised that further violation of the policy would result in further discipline "up to and including suspension or termination" and the Board ordered that its decision be placed in Cohen's personnel file (Cohen, 971).

The Ninth Circuit held that the policy was unconstitutionally vague as applied to the teacher's in-class speech, noting that the speech did not fall within the policy's core definition of sexual harassment and that the teacher had used this teaching style for years.

2000S: COURTS BEGIN LIMITING UNIVERSITY STUDENT SPEECH

In the first decade of the new millennium, a line of cases showed that courts were tending to rule against students pursuing First Amendment claims against their universities. But before this development began, university press freedom was energetically endorsed in a federal case in 2001. In *Kincaid v. Gibson*, the U.S. Court of Appeals for the Sixth Circuit ruled that administrators at Kentucky State University violated students' rights by refusing to distribute the school yearbook (*Kincaid*). University officials objected to the content of the yearbook and the color of its cover, among other things. However, their main objection was that the yearbook looked amateurish and would be an embarrassment to the university. The court held that: (1) the yearbook was a limited public forum for First Amendment purposes; (2) By confiscating all copies of the yearbook, university officials did not impose reasonable time, place, and manner restriction upon the speech in the limited public forum; (3) the *Hazelwood* case did not apply at the university level; and (4) school officials' conduct violated the First Amendment even if yearbook was not considered a public forum. In the ruling, Judge R. Guy Cole wrote, "There is little if any difference between hiding from public view the words and pictures students use to portray their college experience, and forcing students to publish a state-sponsored script. In either case, the government alters student expression by obliterating it" (*Kincaid*, 355). Cole's ruling continued the legacy of the Supreme Court's Barnette case, when Justice Robert H. Jackson warned against any attempt by a state official to "prescribe what shall be orthodox."

However, student press advocates were disappointed when, in 2002, the *Ninth* Circuit—the same court that protected the professor in Cohen—applied the Hazelwood test to a university dispute in California. (*Hazelwood v. Kuhlmeier* is the landmark 1988 Supreme Court case establishing the right of high school administrators to censor stu-

dent newspapers for pedagogical reasons.) *Brown v. Li* arose because university policy required a graduate student to submit his thesis to a committee for final approval before filing the thesis with the university library (*Brown*). In accordance with this policy, the student submitted his thesis to the committee, which approved the thesis. Graduate thesis papers often contain an "acknowledgments" section wherein students thank certain people for their help or moral support. However, the student then inserted a "disacknowledgments" section into his thesis—criticizing people for perceived wrongs—and attempted to file the thesis in the university library. When members of the committee realized this, they prohibited the student from filing the thesis but still allowed him to receive his degree. Applying the *Hazelwood* test, the Ninth Circuit upheld the committee's actions, holding that the assignment was part of the student's curriculum and the committee's decision was reasonably related to a legitimate pedagogical objective: teaching the student the proper format for a scientific paper. The court said:

> The parties have not identified, nor have we found, any Supreme Court case discussing the appropriate standard for reviewing a university's regulation of students' *curricular* speech. It is thus an open question whether *Hazelwood* articulates the standard for reviewing a university's assessment of a student's academic work. We conclude that it does (*Brown*, 949).

Because of the explicitly stated requirements for the format of a thesis, the court concluded that the university committee had every right to order the removal of the "disacknowledgements" section in accordance with the proper format for academic papers. However, some student press advocates believe applying the K-12 case *Hazelwood* to a university was a serious error, portending a coming era when judges would apply principles from cases involving middle school and high school students to the university context. On the other hand, the facts of the case—considering that the format of a thesis would be seen as within the purview of the university's authority to establish curriculum requirements—suggest that the case will have limited precedential value when it comes to disputes involving more common forms of student expression.

THE HOSTY BOMBSHELL

In 2005, in *Hosty v. Carter*, the U.S. Court of Appeals for the Seventh Circuit applied Hazelwood in a case involving a newspaper at a public university in Illinois. When the Governors State University student newspaper, The Innovator, began printing articles that were critical of university employees, the dean told the printer that the university would not pay for any issues that had not been reviewed and approved in advance (*Hosty*). The students who worked at the newspaper filed suit against the dean (Patricia Carter), the university, and others for depriving them of First Amendment rights in violation of a federal law known as "Section 1983" that authorizes a civil suit seeking damages against public officials.

The narrow (5-4) *Hosty* decision (which affects states in the Seventh Circuit, with jurisdiction over Illinois, Indiana and Wisconsin) has been the subject of debate and handwringing by advocates for a free student press. Free-press advocates were disappointed by the court's decision that the *Hazelwood* standard (established by the Supreme Court in a high school case) can apply in the university setting. Some student press advocates believe that opening the door to *Hazelwood* at the college level makes *Hosty* a dangerous decision for student press freedom. The court could just as easily have gone the other way (as the dissenters did, which will be discussed below) in recog-

nizing the distinction between the appropriate level of control over students who are children and students who are adults.

The Supreme Court has not addressed the question of whether the more administration-friendly standard in *Hazelwood* applies equally in the context of public university education (as opposed to elementary or high school education). In a footnote to *Hazelwood*, the Supreme Court said: "[a] number of lower federal courts have similarly recognized that educators' decisions with regard to the content of school-sponsored newspapers, dramatic productions, and other expressive activities are entitled to substantial deference. We need not now decide whether the same degree of deference is appropriate with respect to school-sponsored expressive activities at the college and university level" (*Hazelwood*).

Writing for the majority in *Hosty*, Judge Frank Easterbrook referred to this footnote:

…Plaintiffs argue, and the district court held, that *Hazelwood* is inapplicable to university newspapers and that post-secondary educators therefore cannot ever insist that student newspapers be submitted for review and approval. Yet this footnote does not even hint at the possibility of an on/off switch: high school papers reviewable, college papers not reviewable. It addresses degrees of deference. Whether some review is possible depends on the answer to the public-forum question, which does not (automatically) vary with the speakers' age (*Hosty*).

It is odd that the majority of the en banc court (the full court of appeals) agreed with Easterbrook, considering the back-and-forth nature of his decision (at times leaning toward the students, but at other times leaning toward the university)—as well as his inability to settle on the status of the newspaper. Was it a public forum? If so, what kind? In contrast, the dissenters had a clearer argument, which will be discussed below.

Easterbrook noted that the newspaper in *Hosty* was subsidized by the university, and "[f]reedom of speech does not imply that someone else must pay" (*Hosty*, 737). He reasoned that the paper might be a "designated public forum" or "limited-purpose public forum," both of which have some censorship protections, requiring the university to show that the regulation or administrative action is content-neutral; that it serves a substantial government interest; that there is not a total ban on communication; and that it is no more restrictive than is necessary to serve the government interest.

Easterbrook never took a clear position on what kind of forum existed. Frank LoMonte criticized Judge Easterbrook's failure to ultimately determine whether the newspaper was a limited public forum. In LoMonte's opinion, Easterbrook was too preoccupied with the question of whether school officials had immunity from the lawsuit. In an article for *The First Amendment Law Review*, LoMonte wrote:

> The court embarked on a rambling and not entirely coherent expedition through forum doctrine, suggesting without firmly concluding that the Innovator likely would have qualified for heightened First Amendment status as a designated public forum--a question mooted when the case was pretermitted on immunity grounds (LoMonte).

In the student newspaper context, the forum analysis can be confusing because many student newspapers are subsidized in some manner by the university with which they are connected. Such subsidy can take different forms. For example, a university may provide any combination of funds, physical space, materials, logistical support services, salaries for faculty advisers or even course credit or extra credit for journalism student participation in the newspaper. If there is any form of sponsorship or subsidy by the university, the student newspaper could be a limited public forum, which

can open the door to disputes about the purposes for which the forum was created and whether the university has sufficiently justified the restriction on speech.

HOSTY'S NUMEROUS PROBLEMS

Hosty was an appeal decided solely on the issue of qualified official immunity of Dean Carter and others—not on the merits of a constitutional challenge. Nevertheless, that did not stop Judge Easterbrook from discussing several other questions—only to leave them unresolved. These questions involved (1) the forum status of the newspaper; (2) the relationship between the forum status and the possible violation of the students' First Amendment rights; (3) the relationship (if any) between the forum status and immunity and (4) the decision of what to do if the students' First Amendment rights were violated—e.g., did university officials infringe "clearly established rights," thus losing the immunity that is normally granted to public officials in the exercise of their duties?

The *Hosty* case is both important and frustrating. Several key issues are left dangling that could have been resolved with a more comprehensive and thoughtful opinion. Easterbrook did not explain how the determination of the newspaper's forum status relates to whether Dean Carter and other administrators enjoy immunity for their actions. He concluded that the rights at stake were not clearly established and therefore immunity is upheld. However, he did not explain whether the forum status of the newspaper had some impact on whether the First Amendment rights of the students were sufficiently established for the administrators to know what they were doing was a violation of those rights. He implied that the newspaper was a limited public forum because of the subsidies offered by the university, but because he stopped short of concluding it was such a forum, he did not explain why that distinction matters. If it is a public forum, the university is limited by the First Amendment from interfering with the content or operation of the newspaper. But since the case was based on immunity and Section 1983 liability, the question of forum status was not given proper attention.

HOSTY AND QUALIFIED IMMUNITY

The immunity question posed to the court in *Hosty* was whether the constitutional rights of the student editors were so clearly established that Dean Carter should have known she was violating them when taking the action she did. The protection offered by qualified immunity has been developed in case law over a period of many years to prevent administrative officials from constantly facing lawsuits over their decisions. It is a difficult standard to meet, and thus many lawsuits brought against public officials are unsuccessful.

The court concluded that because of the lack of precedent in this area, Carter did not knowingly violate clearly established rights. Easterbrook wrote: "One might well say as a 'broad general proposition' something like 'public officials may not censor speech in a designated public forum,' but whether Dean Carter was bound to know that the *Innovator* operated in such a forum is a different question altogether" (*Hosty*, 738). The *Hosty* majority used the district court's decision as a way to narrow the question presented in such a way to find in favor of the public official:

> The district court held that any reasonable college administrator should have known that (a) the approach of *Hazelwood* does not apply to colleges; and (b) only speech that is part of the curriculum is subject to supervision. We have held that neither of these propositions is correct—that *Hazel-*

> *wood*'s framework is generally applicable and depends in large measure on the operation of public-forum analysis rather than the distinction between curricular and extra-curricular activities.

But even if student newspapers at high schools and colleges operate under different constitutional frameworks, as both the district judge and our panel thought, it greatly overstates the certainty of the law to say that any reasonable college administrator had to know that rule… (*Hosty*).

The majority also justified narrowing its decision by citing the arguments of the parties:

For reasons that should by now be evident, the implementation of *Hazelwood* means that both legal and factual uncertainties dog the litigation—and it is the function of qualified immunity to ensure that such uncertainties are resolved by prospective relief rather than by financial exactions from public employees.

HOSTY AND PRIOR REVIEW

Judge Terence T. Evans, writing for the four dissenters, said: "Prior to *Hazelwood*, courts were consistently clear that university administrators could not require prior review of student media or otherwise censor student newspapers" (*Hosty*, 739). Evans also said:

> The Innovator, as opposed to writing merely about football games, actually chose to publish hard-hitting stories. And these articles were critical of the school administration. In response, rather than applauding the young journalists, the University decided to prohibit publication unless a school official reviewed the paper's content before it was printed. Few restrictions on speech seem to run more afoul of basic First Amendment values. First, prior restraints are particularly noxious under the Constitution. See *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539, 559, 96 S.Ct. 2791, 49 L.Ed.2d 683 (1976) ("prior restraints on speech and publication are the most serious and the least tolerable infringement on First Amendment rights"); *Near v. Minnesota*, 283 U.S. 697, 713, 51 S.Ct. 625, 75 L.Ed. 1357 (1931) ("it has been generally, if not universally, considered that it is the chief purpose of the [First Amendment's free press] guaranty to prevent previous restraints upon publication"). Second, and even more fundamental, as Justice Frankfurter stated (albeit in somewhat dated language) in *Baumgartner v. United States*, 322 U.S. 665, 673–74, 64 S.Ct. 1240, 88 L.Ed. 1525 (1944), "one of the prerogatives of American citizenship is the right to criticize public men and measures." College students—voting-age citizens and potential future leaders—should feel free to question, challenge, and criticize government action. Nevertheless, as a result of today's holding, Dean Carter could have censored the Innovator by merely establishing "legitimate pedagogical reasons." This court now gives the green light to school administrators to restrict student speech in a manner inconsistent with the First Amendment (*Hosty*).

The decision in *Hosty* was simply to recognize that because *Hazelwood* applies at the university level, the existing law was not clear enough to strip the university administrator of immunity. This leaves somewhat unsettled the extent to which student journalists can seek First Amendment protection when university administrations exercise prior review over student newspapers in Indiana, Wisconsin and Illinois.

DESPITE HOSTY, PROTECTIONS STILL EXIST

It is important to remember that the *Hosty* decision did not overrule the precedents that protect student First Amendment rights. The Seventh Circuit's decision in *Hosty* cannot supplant or supersede the decisions of the U.S. Supreme Court. For example, in a 2000 concurring opinion, Justice David Souter recognized that the Supreme Court's "university cases have dealt with restrictions imposed from outside the academy on individual teachers' speech or associations," whereas "cases dealing with the right of teaching institutions to limit expressive freedom of students have been confined to high schools, whose students and their schools' relation to them are different and at least arguably distinguishable from their counterparts in college education" (emphasis added) (*Bd. of Regents*).

At the time of *Hosty*, only one of the U.S. Appeal Circuits held that the *Hazelwood* analysis cannot be applied in a university context. In a footnote in *Student Government Association v. Board of Trustees*, the First Circuit incorrectly suggested in 1989 that the Supreme Court in *Hazelwood* had actually decided the issue. Other circuits had either adopted the *Hazelwood* analysis in the university setting or had applied it in a modified form (868 F2d 473). Yet, while *Hazelwood* somewhat altered the context (whether at the university or high school level), *Hazelwood* probably did not change the results of the substantive law when it comes to a university-level publication or other expressive activity.

In *Ward v. Polite,* a 2012 decision from the U.S. Court of Appeals for the Sixth Circuit, the court expressly held that *Hazelwood* applies in the university setting (*Ward*). Ward involved the dismissal of a student from Eastern Michigan University's graduate counseling program. The student in a practicum course requested to refer, rather than directly counsel, a homosexual client, because the student believed the counseling would conflict with the student's personal religious beliefs. Ultimately, the court reversed the summary judgment that had been entered in the university's favor and permitted the student's First Amendment claim to proceed to trial (Ward, 737). In dicta concerning student newspapers, the Ward court made clear that the context of the *Hazelwood* analysis could vary greatly between the university and high school settings:

Nothing in *Hazelwood* suggests a stop-go distinction between student speech at the high school and university levels, and we decline to create one. … By requiring restrictions on student speech to be reasonably related to legitimate pedagogical concerns, *Hazelwood* allows teachers and administrators to account for the "level of maturity" of the student. Although it may be reasonable for a principal to delete a story about teenage pregnancy from a high school newspaper, the same could not (likely) be said about a college newspaper. To the extent that the justification for editorial control depends on the audience's maturity, the difference between high school and university students makes all the difference (*Ward*, 733-734).

The *Ward* court also suggested that it is the public forum analysis that may typically be unfriendly to students' freedom of expression:

Hazelwood also features a question crucial to the resolution of all school-speech cases, whether at the high school or university level: Whose speech is it? The closer expression comes to school-sponsored speech, the less likely the First Amendment protects it. And the less the speech has to do with the curriculum and school-sponsored activities, the less likely any suppression will further a legitimate pedagogical concern, which is why the First Amendment permits suppression under those circumstances only if the speech causes substantial disruption of or material interference

with school activities (*Ward*).

It is interesting to contemplate the relationship between a school-sponsored publication (such as a university alumni magazine) and the subsidizing of a school newspaper. The Ward court suggests that if it is school-sponsored speech, less First Amendment protection is available to student journalists. *Hosty* and other cases suggest that if the paper is subsidized with university money, it is more likely to be a limited public forum and thus students will get greater First Amendment protection. At what point does subsidy (thus enhanced First Amendment rights for students) become school-sponsored (limited First Amendment rights for students)?

This quandary suggests that public forum status may be the wrong standard to use in student First Amendment cases, and a review of legal articles echoes the confusion surrounding public forum analysis. In a 2009 issue of *Nova Law Review*, Marc Rohr explored "the ongoing mystery of the limited public forum," concluding with a simple plea: "Above all, give us clarity, please." If legal scholars and judges cannot agree on what a public forum is, perhaps it is the wrong principle to use in deciding First Amendment cases.

Both the *Hosty* and *Ward* decisions suggest that the applicability of *Hazelwood* in the university setting will not alter the conclusion that traditional university student newspapers (i.e., newspapers produced and managed by students and that are extracurricular activities) are beyond the editorial control or censorship of university faculty and administrators. Instead, the various distinctions between the university setting and the high school or elementary school settings are borne out in the application of the *Hazelwood* analysis; i.e., university student newspapers are typically public forums while high school student newspapers are not typically public forums. Subsequent decisions in the Seventh Circuit applying *Hosty*, including, for example, *Badger Catholic, Inc. v. Walsh*, confirm this assertion.

Likewise, other circuits that have applied *Hazelwood* in the university setting have maintained the same pre-existing robust First Amendment protection for traditional student newspapers. In *Husain v. Springer*, the Second Circuit held:

> The Fourth, Fifth, and Eighth Circuits, therefore, have adopted the position that the establishment of a student media outlet, in essence, necessarily involves the creation of a limited public forum where the only restraint is on the speakers who can participate (i.e., students) and where there can be no restrictions on the content of the outlet except with respect to content that threatens the maintenance of order at the university. Two other circuits, while also recognizing that student media outlets often enjoy First Amendment protection from interference by school administrators, have taken a less expansive view. The Sixth and Seventh Circuits agree that the establishment of a student media outlet can create a limited public forum but have concluded that the scope of that forum can be restricted by the school. In other words, these courts do not consider the creation of a student media outlet as categorically involving the creation of a limited public forum within which students may speak on essentially any subject without fear of reprisal, but rather look to the context of the public university's treatment of a student media outlet, including its intent in creating the outlet and practices with respect to the outlet, in order to determine what First Amendment protection the outlet, and those that participate in it, receive.

Nevertheless, although the treatment of forum analysis with respect to student me-

dia outlets at public universities has differed in some respects in the various circuits, all the circuits that have considered the issue have determined that, at the very least, when a public university creates or subsidizes a student newspaper and imposes no ex ante restrictions on the content that the newspaper may contain, neither the school nor its officials may interfere with the viewpoints expressed in the publication without running afoul of the First Amendment.

We agree that, at a minimum, when a public university establishes a student media outlet and requires no initial restrictions on content, it may not censor, retaliate, or otherwise chill that outlet's speech, or the speech of the student journalists who produce it, on the basis of content or viewpoints expressed through that outlet. This holding is fully consistent with and, indeed, substantially follows from, our decisions, and those of the Supreme Court, in other cases addressing limited public fora.

HOSTY'S SILVER LINING

A silver lining from *Hosty* is that it ultimately inspired a greater level of protection for student newspapers at public universities in Illinois. Shortly after the Hosty decision, the Illinois legislature reacted to the case by enacting the Illinois College Campus Press Act, which explicitly declared all student-run newspapers at Illinois public universities to be public forums in which university administrators could have no editorial control or ability to censor content (110 ILCS 13/10). The federal courts in Illinois have expressly held that the Act supersedes the holding in *Hosty* to the extent of any conflict (*Moore*).

This is an interesting issue when it comes to the power of courts. It is an important feature of our democratic system that judicial rulings are subject to modification by legislative bodies (federal judges are not accountable to the people —legislators are). However, if federal courts base the ruling on a constitutional provision, legislation cannot modify the ruling.

It could be argued that, at least in the state of Illinois, the *Hosty* decision has no lasting practical effect. If anything, the *Hosty* decision ultimately generated more vigorous protections for student journalists by encouraging the Illinois legislature to pass the Illinois College Campus Press Act. Furthermore, the ruling focused the attention of the student press community about the extent to which student journalists should be free to choose the content of their publications. In 2015, the campaign to protect student speech and press rights picked up steam when North Dakota's legislature unanimously passed a bill protecting student newspapers at public schools and colleges from censorship. In 2016, Maryland followed suit with a law protecting high school and college student journalists from censorship, regardless of whether the school financially supports the media outlet or if the publication is part of a class. Grass-roots campaigns continue in other states, signaling a renewed interest in protecting student media nationwide.

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Lighting It Up

Journalism as a Conversation at the Private University

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ABSTRACT

Student journalists at private universities do the hard work of turning the lights on in the darkened, pseudo-public spheres on their campus. Without a clear idea of who is obligated to be the teller of unsavory truths on the private university's campus, student media must often take up the torch. Building on Jurgen Habermas's and Alexander Kluge's work on the "public sphere" and Doreen Marchionni's "journalism as a conversation," student media publications can be examined for their coorientation, informality, and interactivity. Using two stories from the student media of Pacific Lutheran University as a case study illustrates how a robust student journalism outlet is a vital component of initiating important conversations in the public sphere of the private university. This investigation includes suggestions for implementing these strategies at other private universities.

INTRODUCTION

The lights are off. The room is dark. There are a few dormant iMacs sitting in a cluster of desks. On those desks are discarded drafts of articles, empty coffee mugs, candy wrappers, remnants of food, all hidden in the darkness of the room. A student journalist walks into her office and turns the light on.

She walks to her desk and checks her notifications: there is, once again, an absolute landslide of feedback via email, mentions on Twitter, and debating commenters on Facebook. The newspaper published another big story Friday morning, and her private university campus cannot stop talking about it.

The authors tell this fictional story because they think it is representative of the role played by student journalists at private universities: under the right circumstances and using standard journalistic tools, they turn the lights on to what might be hiding in a darkened room. Private universities do not have the mandate of transparency

found at state universities. Without the courage and tenacity of student journalists, a private university can leave the lights off and choose not to discuss the difficult issues.

Exploring Habermas' idea of the public sphere and expanding on Doreen Marchionni's work with journalism as a conversation, this research delves into two recent events in the student newsroom at Pacific Lutheran University. The authors explore how the student journalists prepared for the events and how the university administration and the community reacted—and continue to react. Through this, the authors conclude that a robust student journalism outlet is a vital component of initiating important conversations in the public sphere of the private university.

THEORETICAL BASIS: THE PUBLIC SPHERE

The idea of the public sphere comes from sociologist Jurgen Habermas's foundational work, *The Structural Transformation of the Public Sphere* (1989). In this, he conceptualizes the public sphere as the "sphere of private people [that] come together as a public." He further explains this a few years later, describing it as "a realm of our social life in which something approaching public opinion can be formed," adding the qualification that "access is guaranteed to all citizens" (27).

At a private university, the reality of the public sphere is that it is a pseudo-public sphere. The university acts in its own interests and is only obligated to reveal information that is in its best interest to students, faculty, and staff. While the private liberal arts university may claim that its core tenets include transparency, diversity, social justice, or a number of other of progressive paradigms, these tenets are only investigated by the university in ways that make sure the brand or image of the university is preserved. As an example, an honest public sphere at a private university would recognize that its student body is not diverse because students of color are tokenized oddities; the pseudo-public sphere, which the university facilitates, over-represents the opinion that the university is diverse due to the statistics of its student body, regardless of lived experience.

Habermas posits that a public sphere is where rational dialogue and debate happen about the lifeworld experienced by the private citizens. As citizens discuss and shape ideas that create public opinion in this sphere, they shape democratic society. The public sphere is the meeting of private citizens and the power of the state; the debate that takes place in the public sphere inevitably shapes both how people behave individually and how the state represents these individuals (1989). The private university, of course, is not a democracy or a "state"—it operates independent of much of the governmental oversight at a public institution. This does not change the idea, however, that the public sphere of the private university that faculty, students, administrators, and staff all inevitably participate in has great effect on what happens in the university. It is held to the opinions of the faculty and the students that constitute its presence. The student journalist is vital in instituting the access to information that facilitates the ability of "streams of communication" in the public sphere to "coalesce into bundles of topically specified public opinions" at the private university (Habermas 1992, 360).

Alexander Kluge describes an oppositional, or alternative, public sphere as "a type of public sphere which is increasing and changing, increasing the possibilities for a public articulation of experience" (Kluge, Levin, & Hansen 1981, 211). This alternative public sphere stands in contrast to the pseudo-public sphere that claims to be representative but actually excludes. A pseudo-public sphere only shows "parts of reality, selectively and according to certain value systems," seemingly, but not actually, rep-

resentative of a universal experience (212). The creation of alternative public spheres counters this presentation and begins to produce a more representative public sphere. This is important to creating effective civil discourse.

Kluge argues that the public sphere can only be produced when one accepts "the degree of abstraction which is involved in carrying one piece of information to another place in society"; he believes this is the "only way we can create an oppositional public sphere and thus expand the existing public sphere" (Kluge et al. 1981, 212). The student media of a private university, then, by taking information from a non-public sphere into an alternative public sphere, helps expand the public sphere of the university. The authors postulate that, in this private university context, discussion moves from the alternative—where only students, even in mass, are in the conversation—and enters the public sphere when the university and student governing bodies begin to enter the stream of conversation.

The work of student journalists at the private university is particularly important because it is unclear at their universities who would disseminate honest information about important issues. In contrast to public universities, the private university is not held accountable in the same way by the state, public record requests, and local journalists. Student journalism at a private university serves as the primary agent that brings potentially unsavory information from non-public spheres and, by employing the alternative public sphere, turns on the light.

JOURNALISM AS A CONVERSATION

Journalism is no longer just a lecture. It's more like a seminar: a conversation among equals exploring something together. When well-practiced, journalism becomes the impetus for vital community conversations. Student media at private schools offers students an ideal opportunity to practice journalism as a conversation—a new, proactive model developed for 21st century journalism. The community at a private university tends to be small and these enterprising student journalists often work in close proximity with people, both students and administrators, who engage in the challenging issues facing the campus community.

In practicing journalism as conversation, student journalists no longer just think of a story, write the story, publish the story, and move on to the next story. They think of a story idea that has the potential to start a discussion in the community, publish the story, and remain involved in the conversation once the story ignites. They participate in what John Dewey (1927) suggested as the public method: face-to-face conversation that feeds into the public discussion and renews people's ability to evaluate and discriminate the contents of public discussion and what is best for them.

In this evolutionary model, student journalists supply the light—the facts—but the community fills in the story as the issue is discussed and negotiated.

A pioneer in the theoretical aspects of journalism as a conversation is Doreen Marchionni (2013) who examined this notion in "Journalism-as-a-Conversation: A Concept Explication." Marchionni remarked that this notion of journalism as a conversation began as public journalism, which was closely tied to the notion of public sphere proposed by Jurgen Habermas (1989).

Marchionni (2013) explained her variable of coorientation as one of the key elements in journalism as a conversation. She added that this aspect was declared in 2012 as one of the biggest ideas in journalism during the last 100 years by the Association for Education in Journalism and Mass Communication (AEJMC). Marchionni sug-

gested that coorientation, which is the perceived similarity of journalists and readers, represents the collaborative nature of the evolutionary journalism model or "bringing citizens directly into the reporting process" (142) She added that coorientation works best when journalists "are more like the citizens they are supposed to serve" (2015, 221). Coorientation can be easily attained for student journalists at a private university because the audience tends to be easily drawn into stories produced by colleagues in student media and the audience is mostly comprised of similar demographic citizens.

Another variable Marchionni addressed was the tone or voice of the journalist's storytelling, which she described as informality. She suggested that in order for news to be less lecture and more conversational, the journalist needed to more personal and slightly less professional (2013, 140). While this notion may cause seasoned journalists to quake, it offers the student journalists an attractive way to dive into a story and even add a first-person perspective they often find appealing due to its democratizing, personal nature.

The modern framing of journalism as a conversation becomes most apt when one applies the variable of interactivity as mentioned by Marchionni (2013, 142). Today's university students rely heavily on electronic conversations, from email to social media. They have no compunction about responding virtually and vociferously to material that their colleagues publish for student media. Thus, interactivity can be assessed on a private school campus.

At the conclusion of her foundational piece on journalism as a conversation, Marchionni proffered that experimentation of this evolutionary practice needed to be conducted.

The authors suggest that student media at a private university presents an outstanding opportunity to explore the reach of journalism as a conversation. The population is compact and focused. The administration's goals may differ from the population's goals, but the administrators may be open to allowing the student journalists the opportunity to begin the discussion. The media have the unique opportunity to bring to the masses the challenges and conflicts otherwise divulged only to a few stakeholders, thus shedding light on the situation in a way the administrative leadership may not.

METHODOLOGY

Two examples of a journalism as a communication experiment occurred at Pacific Lutheran University in the past 18 months. These issues focused on challenges found at many universities: student alcohol abuse and student athletes' group-think.

"Get drunk, make mistakes:" This publication in October 2015 asked difficult questions of various populations on campus. The story demonstrated a unique narrative story-telling method that came under attack. Publication resulted in many meetings on campus among various groups that formerly did not engage, but were brought together to discuss the issue of alcohol at off-campus parties.

"Every Man a Lute." The publication of this team-written story in student newspaper The Mast sought information from a variety of sources on campus and resulted in social media conversations and swift action from administration to promote the elimination of long-standing misogynistic slogan.

Both of these stories will be assessed with regards to three variables from Marchionni's work: interactivity, informality, and coorientation. This assessment looks at the stories in question, social media posts from Facebook and Twitter concerning the stories, and interviews with student reporters and administrators. The authors then,

based on these analyses, suggest that these stories fit the criteria of journalism as a conversation and thus demonstrate a significant role for student media at a private university.

CASE STUDY: GET DRUNK, MAKE MISTAKES

"How do we get here and how does this all get started?" The question was asked by the editor of the Pacific Lutheran University newspaper and magazine in a 2015 story known as "Get Drunk, Make Mistakes." In a seven-section, first-person narrative, she compiled the stories of multiple partiers and multiple parties; she explained in a disclaimer that she created this composite for the sake of anonymity, in hopes of keeping students out of trouble but still be able to "cover this sensitive topic" (Lund 2015).

Fig. 1. Cover of student publication, *Mast Magazine*, Oct. 30, 2015.

Interactivity

The students reacted to this suddenly public conversation in a way that showed it truly was a "sensitive topic." Taking to Twitter, many were offended that the article did not clearly state its purpose. One such commenter was student Arika Matoba: "What is this Get Drunk Make Mistakes article? That normalizes judging people and over drinking?? THAT is the feature?????" (Matoba 2015). Matoba was particularly upset with the agenda-setting she read into the magazine's choice of cover photo, which opted for "Get Drunk Make Mistakes" instead of a story about an autistic man continuing his family's legacy at the university, writing that the publication "uplifts party culture and unsafe drinking over stories of overcoming adversity simply to make some noise" (Matoba 2015). Another student remarked that it lacked any sense of "activism" or "morality," having "no overall message," instead "endorsing a negative culture" (Anderson 2015). In response, the publication encouraged its Twitter users to send their thoughts in as a letter to the editor. It also clarified why the story made the cover (Mast Media 2015).

Tweets, Facebook posts, and Snapchat interactions after the story was published showed how capable the student media organization was at creating conversation. Journalism as a conversation situates stories not as a lecture to the audience, but as interactive with the audience. Contemporary private universities are particularly well-situated to showcase this interaction due to the prevalence and narrowness of scope in both digital and real life social networks of students. Conversations about hot topics brought up by student media easily spread through the community because it is well-linked together and only needs to travel a short distance.

In the case of "Get Drunk, Make Mistakes," the story quickly made palpable impressions on the social space of the university, as evidenced by the interactions on social media. To translate into terms of the public sphere, the private university's pseudo-public sphere showed it was fragile because a neglected topic was easily brought up by student journalists.

In response to this student story, the university's student government hosted an

event to talk about drinking culture on campus. The event hosted about 50 people and included Joanna Royce-Davis, the vice president of student life. A sphere concerning a profoundly important yet difficult issue to address was broken into as a result of the work of student media, showcasing how journalism as a conversation functions on campus.

Informality

"Get Drunk, Make Mistakes" shows the desire to flip on the light switch in a darkened pseudo-public sphere. Seeing journalism as a conversation, the story sought to highlight issues that people should be talking about in the ways students talked about it. The disclaimer said the author wanted to talk about "smoking, drinking, partying and hooking up at" her university; throughout the article, she documents experiences of being busted by police, the "party creepers" who live in the impoverished area surrounding the university but show up at the parties, and how these gatherings differ from those at nearby public universities (Lund 2015). This informal diction showed that this was not a lecture, but a shared experience by students and for students.

Coorientation

While the informality increased the coorientation of the piece, the story needed to have a marked purpose to contribute (or create) meaningful conversation. It was as if the student media organization had turned the lights on and rudely awoken a peacefully resting student body, but offered no explanation for its perceived impoliteness. The piece adequately began conversation but was not clear as to why it was doing so, so the conversation sparked was more about the agenda-setting of the publication, rather than the issues about party culture it intended to explore.

Seeing the potential damage to credibility due to this miscommunication, the staff decided to release an apology letter that clearly articulated the organization's dedication to journalism as a conversation that takes active care in cultivating an active public sphere. The letter began by establishing coorientation: noting that the student journalists loved being students at the university. Then they clearly stated the purpose of creating conversation: "to shed light on a little-talked about issue, hoping to spark conversations about how party culture works and what it means for our community" and, adding later in the piece, "Most importantly, we wish to use [the publication] and the stories in it to point campus conversation toward productive discourse" ("Regarding *Mast Magazine*" 2015).

This article, in effect, accomplished two things: first, it showed the purpose of journalism as being a conversation; second, it helped reinforce the student journalists' orientation and role at the private university as stewards of a public sphere who were not just capable of, but responsible to, journalism as a conversation.

Conclusions

This story also illustrates that on-campus journalism could not just develop an alternative public sphere but that the alternative space created can directly lead to a break into the public sphere of the university. Royce-Davis said in an interview that the article served as a "catalyst" to start a conversation that people were ready to respond to because the conversation thus far had taken place in a non-public sphere she described as its own "segmented, silo-ed place." The story is now used as a "common reference" when talking in athletics about drinking culture (Royce-Davis, personal

communication, March 27, 2017).

"When the article came out," she said, "what it invited and provided was instead a response from the entire community to say: 'This isn't so silo-ed. This is bigger and has greater impact and influence across many students" (Royce-Davis, personal communication, March 27, 2017).

In conclusion, "Get Drunk, Make Mistakes" and its following apology shows how, with careful engagement in the production of journalism as a conversation in an alternative public sphere—with engagement of students with students, online and in person—the student journalist can be the impetus for conversation at Pacific Lutheran University.

CASE STUDY: EVERY MAN A LUTE

The next example from the student media organization, almost exactly a full year later, started with a tweet. The university's sports Twitter account, @golutes, had posted a picture containing a traditional football team slogan known as Every Man a Lute, also known as EMAL, had been blurred out and obscured on a football practice jersey. Player Parker Smith responded on Twitter: "Why is the EMAL blurred out?" and his tweet garnered more than 30 retweets and 80 likes (Smith 2015). This began a quiet murmur among student athletes on campus about what may be happening to the slogan.

Fig. 2. Cover of student publication, *The Mast*, Nov. 4, 2016.

Coorientation

In the student newsroom, the staff, which included the new editor and approximately four other staffers had been around for the "Get Drunk, Make Mistakes" story, was alerted to this new conversation via the popular tweet. The conversation was much bigger than just about what the university had decided about the slogan: it was also about the history of the team, the history of the university, the nature of patriarchy in language, and the meaning of inclusion as the university moved forward. The story was covered by a diverse group of people—some knew plenty about EMAL, some knew almost nothing. That helped orient the story in the language and ideology of the student body: due to the explanatory nature of the piece, it was clear this was not a lecture where the journalist knew it all. This was an exploration being conducted together, as a community.

The story was published as a cover story in the Nov. 4, 2016, print issue of the newspaper. It was divided into sections titled "The Legacy," "Exclusionary Language," "In Response," "On the Books," and "Put Into Practice" (Thames et al. 2016). It methodically provided information as to inform the conversations that constitute the public sphere: the history of the term, based on archival research; information from communication faculty about semantic asymmetry; student, faculty, staff, and alumni input; stated marketing practices at the university; and information on how the team and administration planned to move forward, respectively.

Informality

The story is framed with an especially long headline in large text, underneath a "Every Man a Lute" title: "PLU marketing shies away from the legendary slogan: is EMAL an important legacy or exclusionary language?" This extraordinarily long headline is not a symbol of novice journalists; rather it was a way of denoting the exact goal of the story. This strategy appears to follow the goal of journalism as a conversation: it broke the traditional, formal rules of journalism, which may have led to an impersonal headline due to its untraditional length. Instead, it is motivated to provide facts to a situation and, with the lessons from "Get Drunk, Make Mistakes," a clear structure to guide the conversation forward in a way that is suited to its community. Another option could have been a straightforward 600-word story about the logo being blurred out, opting to do little history or explanation on the terms; instead, this 1,800 word story with a long headline gives facts and a guiding question. It turns on the lights in the darkened room and says "OK, everyone, the reason we're disturbing you is…"

Interactivity

So, what had existed in the non-public sphere (i.e., only among athletes, with little-to-no divergent opinions) was now brought into the alternative public sphere (i.e., of student journalism) in hopes of bringing this conversation into the public sphere. Much like with "Get Drunk, Make Mistakes," this quickly happened—and on a much larger scale. According to Vice President Royce-Davis, the story had provided "an opportunity for multiple perspectives to be in the same space in a way they hadn't been before." This led to the reactions all over campus and beyond. The vice president shared that she hears conversations about EMAL on a "regular basis" (Royce-Davis, personal communication, March 27, 2017).

Perhaps the primary drivers of post-publication conversation were alumni. The conversation was continued by alumni who found the story on the student media website. Troy Brost, in a post containing a photoshopped title—"The Legacy That Will Live Forever"—over an image from the story, wrote that a "handful of administrators and students... considers EMAL (Every Man A Lute), a football term and tradition created 30+ years ago, not inclusive enough to be politically correct" (Brost, 2016). Others included: "This is disheartening," "The level of sensitivity is too much nowadays," and "This is getting a little absurd" (Hatton 2016; Song 2016; and Brown 2016).

The university decided to hold a "PLU Football Community Meeting" about EMAL aimed at alumni: when the university posted on its Facebook page, the invite was for a "peaceful, grace-filled conversation." The conversation was live-tweeted by the student media that originally covered the story.

Conclusions

This conversation on campus—as evidenced by that first unanswered question on Twitter—would not have made it to the public sphere without the work of student journalists. The commitment and awareness to journalism as conversation is apparent in the structure of the story, and such commitment meant that the conversation extended past the story in print, to social media, and into formal conversations of the university. Vice President Royce-Davis ended up grateful that the story had made it so the "door had been opened" for this "necessary conversation that probably needed to have occurred some time ago" (Royce-Davis, personal communication, March 27, 2017).

She noted that "it's been super healthy—not easy!" This was a clear example of

how careful stewardship of stories, which keeps the public sphere and conversation in mind, can have powerful effects on the private university campus.

Suggestions

Clearly, when student media experiments with journalism as a conversation at a private university, there can be real effects of eroding its pseudo-public sphere. This is easily said, however, and not as easily accomplished; it requires the existence of willing administrators, students, and readers. In addition, practicing journalism as a conversation offers journalism educators a broad spectrum of additional skills to add to student journalists' tool boxes.

One of the most important ingredients needed to make this experiment work at a private school are supportive administrators. These administrators need to recognize that the possibility exists for unsavory exposure to unsubstantiated material when dealing with controversial subject in the hands of student journalists. Vice President Royce-Davis recognized that "student media does not present a 'problem' to us," recognizing that as a "troublesome" narrative; instead, student media is a vital contributor "to shared shaping and understanding of community," as it "brings forward information that may be under the surface or not visible otherwise" (Royce-Davis, personal communication, March 27, 2017).

The authors believe that a first step in building a good relationship with administration is to be clear about pedagogy. That may include showing them this paper as evidence that a driven student staff paired with supportive administrators can help make the university a better place. When administrators trust that the student journalists are the best arbiters and curators for examining and collating challenging issues on campus, journalism as a conversation has the best opportunity to exist and flourish.

Brooke Thames, the current editor of *The Mast*, recalled that stories were being approached with the idea of journalism as conversation; this meant it was not difficult to get staffers involved—they already cared about the story. They already had a stake in it, curiosities about it, and feelings toward it (Thames, personal communication, March 28, 2017). Participants were more than willing, because it wasn't that they were being asked to do it; it came out of their desire to know more.

Journalism as a conversation offers journalism educators an array of new tools to use when approaching serious campus stories. Student journalists can be encouraged to consider journalism as the beginning of a difficult discussion, not a one-and-done lecture. This broadens students' notion of the importance of journalism on their campus. Journalism as a conversation reminds students that they are not simply there to tell the stories but to engage fully in the issue after publication because they are now an integral part of the solution.

The readers follow suit. If the student media staff is situated as a part of the community, if it is properly orientated, its community will care deeply about the stories being told. Students will welcome the new participant in the pre-existing conversation that was aching for a more public venue. At the university of the case studies, print newspapers had to be ordered in larger quantities because they were flying off the racks.

This research represents how one small community can engage in the practice of journalism as a conversation. With that in mind, further research could develop programs for educating students and advisers on these theories and how to employ them. The theoretical basis for this paper could be applied to other private university publi-

cations to expand literature on the contemporary functions of journalism as a conversation and the public sphere.

The student journalist from the beginning of the essay sits at her desk, engaging each notification she's received with the same investment she had when her team began reporting on the story. She's busy, tired, and she really needs to clean up her office, but she's deeply satisfied that her team found another issue hiding in the darkness—and turned the lights on.

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The Digital Generation Gap

How Student Journalists Transition from Personal to Professional Uses of Mobile Devices and Social Media

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ABSTRACT

Most college students have never known a world without cell phones and the Internet. Smart phones and tablet computers are highly personal and to some degree an extension of themselves. This study examines how student journalists repurpose digital media for professional use. It validates domestication theory, an extension of Rogers' diffusion of innovation theory, in the use of mobile devices and social media. Students used these devices and media first for personal use, and then adapted them to professional, journalistic uses. The study also finds evidence of students negotiating and renegotiating their online identities on both personal and professional levels, following actor network theory. It also warns of a digital divide in the millennial generation.

INTRODUCTION

Current college freshmen have never known a world without cell phones and the Internet. For them, mobile devices, such as smart phones and tablet computers, and social media, such as Twitter and Facebook, are highly personal and an extension of themselves (Dover, 2012; Heverly, 2007; Turkle, 2005, 2011). At the same time, mobile devices have changed the way both professional and student journalists do their jobs, untethering them not only from their offices but also from their laptops and even from the need for a plug and an Internet connection ("Articles," 2014; Walck, Cruikshank, & Kalyanko, 2015). Along with new technology that makes an office optional, journalists are now expected to engage readers through social media. (Spyridou, Matsiola, Veglis, Kalliris, & Dimoulas, 2013; Mico, Masip, & Domingo, 2013).

New staffers have not yet adopted the culture of the journalism profession (Mensing, 2010), and their experience with digital media (Turkle, 2011) and expectations for how to get and interact with news (Enda & Mitchell, 2013) differ both from professional journalists and from the college media advisers who are teaching them to become

professionals. These students reside on the consumer side of the news-making process and represent the trend of how consumers seek news: socially and through multiple platforms (Enda & Mitchell, 2013; Miller, Rainie, Purcell, Mitchell, & Rosenstiel, 2012; Pew Research Center, 2016).

The position of college news media staffers as deeply interested, young consumers who have not yet internalized professional biases presents an opportunity to research the integration of digital media into journalistic practice and the new paradigm in news-making that digital media have created. This study explores these in the context of a practicum-style lab in which eight undergraduate students created content for a student news website at a Western university.

The purpose of this study is to analyze the experience of college journalists who are learning to transform digital media from a personal mode of expression to a professional one. It can help college media advisers understand what type of training in social media and mobile devices may be needed as they bring newcomers into their organizations. It may also make advisers sensitive to a digital divide among students coming to their institutions.

LITERATURE REVIEW

Humans and Digital Media

Marshall McLuhan (2003) may not have been the first to consider how technology alters the human experience, but his analysis, "the medium is the message," is the most memorable. McLuhan's point is that the medium shapes how the content is presented, and as the content changes, audience expectations change, and the norms of good content shift.

Sherry Turkle, an MIT clinical psychologist, takes that reasoning further, studying the impact of computer technology on people. Turkle finds a give-and-take between the digital technology and people, especially children, who take the new technology as a "fact of life" (Turkle, 2005, p. 66). These observations were originally made in 1984, and even in this early research, Turkle (2005) found children were using technology in their developmental phases, and teens in particular used technology in their identity formation.

What has changed for the millennial generation is the constant presence of others on social media during this exploration (Turkle, 2011). This becomes important for students preparing for a professional career, because artifacts created in childhood can follow individuals into their professional lives (Heverly, 2007). Those artifacts become problematic, as employers have begun examining Facebook pages and other social media sites before hiring applicants (Valdes, 2012), and college journalists increasingly are expected to have a presence on social media to promote their work (Schultz & Sheffer, 2012). This forces students to figure out how to take the digital technology they grew up with and transform it to professional uses (Bethell, 2010, Walck, Cruikshank, & Kalyango, 2015).

Central to any discussion on technology and change is Rogers' diffusion of innovation theory, particularly the Innovation-Decision Process: It begins with knowledge of an innovation, followed by persuasion that it would be useful, a decision whether to adopt it, implementation and confirmation that the decision was correct, at which point the decision may be modified (Rogers, 2005). Within the implementation stage, Rogers (2005) discusses reinvention, in which the adopter customizes the innovation

for personal use. After all, consumers know what functions they want and are trying to make the technology work for them (Sandvig, 2007). Rogers (2005) notes that high degrees of reinvention lead to faster rates of adoption and higher rates of sustainability.

Domestication theory in media research underscores the role of reinvention in diffusion of innovations theory. It holds that adaption for personal use, or "domestication," contributes to rates of adoption and sustainability of technology (Peil & Röser, 2012). For example, the telephone was invented as a business device and was a predominantly male tool, but it proliferated in the United States only after wide acceptance of its use by women for chatting with friends (Peil & Röser, 2012). Important to this study, domestication theory also notes that the meanings and roles of technology are subject to constant change and negotiation (Peil & Röser, 2012). This change in the roles of mobile devices and social media is evident among college journalists as they adapt personal technology to professional use.

While domestication theory provides a theoretical framework for the adoption of mobile devices and social media, the continued use of this technology can be explained by uses and gratification theory, which takes a rational choice approach to media. If media meets the expectations of gratifications sought, then audiences will use it (Sparks, 2006, McQuail, 2008). Students beginning college are still consumers of digital media and theirs is an audience perspective. Recent research that applies uses and gratification theory to social media (Pai & Arnott, 2013) and mobile devices (Wei & Lu, 2014), finds that social media and mobile devices draw audiences because they meet needs for such items as social integration, help in achieving goals, status enhancement, and entertainment. The successful filling of those needs contributes to students' use of these media and willingness to take them into a professional realm, resulting in reinvention (Rogers, 2005).

Innovation in Journalism

Rogers' diffusion of innovation theory has been cited in journalism research exploring how news organizations have responded to technology. The clearest trend in the industry is the proliferation of digital platforms: In 2016, 99 out of 110 news sites reported receiving more traffic from mobile devices than desktop computers, (Pew Research Center, 2016). A majority of U.S. adults, 62 percent, get news on social media sites (Gottfried and Shearer, 2016).

As new and old media converge, news organizations have had a mixed record in adapting to these innovations (Mitchelstein & Boczkowski, 2009; Steensen, 2011). Convergence is complicated by the lack of training and time required to learn the new roles journalists are assuming, as well as the lack of leadership in the implementation (Mico, Masip, & Domingo, 2013). If experienced journalists are not being given training and time to learn how to adapt to social media and mobile devices, journalists straight out college cannot expect instruction on how to modify their personal uses to professional ones. They need to learn this while working for college media.

Students and Mobile Technology

Today's college students have grown up with cell phones, the Internet, and Facebook (Turkle, 2011). They enter higher education as "digital natives," because the digital world is their habitat, compared with previous generations of "digital immigrants" (Bethell, 2010, p. 105). However, it is unclear how comprehensive the digital skills of young journalists are. Of American adults 18 to 29 years old, 8 percent do not own a

smartphone (Pew Research Center, 2017). While that is a small number, it is not 100 percent, and qualitative research on the subject (Livingstone, 2007; Seiter, 2007; Walck, Cruikshank, & Kalyango, 2015) indicates advisers cannot assume every student on their staff is proficient in smartphone use. Those who are proficient, Turkle (2005) notes, have developed a proficiency in a personal and not professional way. Helping students to develop professional standards is the job of advisers.

SUMMARY

One question not addressed in the literature is how "digital immigrants" in student media can instruct "digital natives" in the most effective professional use of mobile technology. Parker Palmer (2007) envisions a subject-centered classroom that encourages students and teachers to learn about a topic from each other. Students may be digital natives and know how to push all the buttons, but they may lack the knowledge of what is appropriate content for a professional journalist. The adviser has the experience and maturity to guide the creation of credible news content, but may not know all of the capabilities of the technology. This shared-learning pedagogy is used in this study. It leads to the research question:

RQ1: How do students transition from using their mobile devices for personal expression to using these tools in a professional manner as college journalists?

METHODOLOGY

The data collection used collaborative autoethnography (Ngunjiri, Hernandez, & Chang, 2010), which relies not only on the field notes of all members of the group as they work through various themes, but also involves questions and discussion among the group members as the themes are explored. The study involved practicum lab courses producing news content for a student-focused website at a Western university. The class requirement was to produce fifteen stories or equivalent work during the semester. Eight students participated, three men and five women, all sophomore status or higher and all but one 25 or younger. Students were encouraged but not required to use digital media with which they were already proficient, such as Facebook, Twitter, and their mobile devices, in their journalistic work. Participation or lack of participation in the study did not affect a student's grade.

Students were asked to keep journals about their use of social media and mobile technology. The instructor/researcher, who had spent 30 years as a professional, kept a journal to provide a "digital immigrant" perspective for comparison. Students contributed thirty-one journal entries over two semesters, and the instructor/research wrote ten.

Questions included: How did you use mobile devices and social media before the semester began? How are you using them now? Is the use changing? Any surprises? Journal entries were coded for recurring themes with no predefined protocol (Peräkylä & Ruusuvuori, 2011), and the coding was checked by a faculty colleague for reliability and discussed during "collaboration sessions" with participants for validity.

An additional methodology, a focus group held in an undergraduate research methods class, was used to validate the findings and further explore the research question. Twelve students served as focus group members while eight served as observers. The notes from observers, the research methods instructor, and the researcher/ moderator were analyzed for the same themes and to see if additional themes emerged.

FINDINGS

Three key themes addressing the research question came out of the journals.

Domestication of Digital Innovation. Students wrote about personal, or domesticated, use of the mobile devices and social media, and a parallel surfaced between their adoption of innovation on a personal level and their willingness to use these tools professionally.

Negotiation of Professional-Personal Use of Technology. There was clear evidence of students negotiating their identities as future journalism professionals as they transitioned from personal use of social media and mobile devices as students. They wrote about both tension between the personal and professional and about the transition to professional.

Digital Divide. A digital divide was revealed within the generation due to costs of both time and money. When considering the research question of how students transition in using their mobile devices for professional use, sometimes the answer is they don't.

Each of these themes will be explored in further depth in this section.

Domestication of Digital Innovation

Domestication theory analyzes the diffusion of media innovations such as the radio, television, and telephone (Peil & Röser, 2012), with the argument that it was not until these technical innovations were accepted into homes with uses that suited the family, particularly wives, that they became culturally common. Looking at that process at a micro level, it might be expected that when individuals adopt technological innovations into their personal lives, they would be more likely to carry them into professional lives.

Student journals. Initial journal entries from the students asked how they used their mobile devices and social media before the study began. They revealed two primary online identities. Three students viewed themselves as heavy consumers of news and sports. Three students wrote that their identity on social media was primarily social, using Facebook, Instagram, and Twitter to keep up with friends and acquaintances on a personal level. One student defined her online identity as minimal, using a landline for calls when possible and expressing disdain for social media.

The use patterns each student brought into the study on a personal level carried through on the professional level in their work. The students who bragged of being news-consuming machines quickly made the transition from consumers to producers of original content. While before they had been "produsers," providing content in the form of comments and repostings (Ridell, 2012), these students became content providers, relying on primary sources they interviewed, events they witnessed, and original writing to create journalism they shared via their social media networks. This level of sharing extended to making their sources aware of the links in the hope that the sources would then further share their work and drive traffic to their site.

In an example of reinvention, these students also engaged in live tweeting. This was particularly successful when they were covering live sporting events, and the tweets read like play-by-play broadcasting. These students recall previous generations of journalists who read the newspaper or watched television news as youngsters and then grew up to do what they had admired in the mass media. The process has not changed, only the medium. Their desire to produce news content on social media grew out of the use of those media as personal, domesticated tools of entertainment.

The students who were active in social media for communication also made a quick transition to more professional uses, but they were not as immersed in the production of online content. Part of this might have been because sports, the topic two of the previously mentioned students covered, is more suited to live tweeting. The students more active in communication wrote about using social media to contact potential sources for stories, and one noted that she had posted a link to a story she wrote, something she had not done before. Her perspective is personal, reflecting her pre-study use of social media: "I gained a lot more support from my Facebook friends than I thought I would."

The student who expressed disdain for social media personally continued her estrangement from the digital world. During the study period, she stopped using the social media she had established to promote her student radio show, because she was not seeing results. Just a few weeks into the semester, she deleted the Twitter app from her smart phone, and by the midterm, she had stopped paying her cell phone bill and relied solely on her mini-tablet computer for Internet connection. Her reasoning was cost, but part of it was also lack of gratification in that use. The phone bill was not a priority when money became tight, because it was not providing uses that were important to her. She still had access to social media through her mini-tablet, but she was reducing her use of that as well. If the device or application is not domesticated, it appears that professional uses are not gratification enough to entice a user to re-engage, at least in this case. Another student noted that as the semester progressed, she engaged in social media less because of the time demands of her schoolwork and journalistic activities. Time has been recognized as a limited resource in uses and gratification research, and time choices reflect gratifications of various uses (Sparks, 2006).

Focus group. In the focus group, participants were closer to graduation, and they exhibited a greater sophistication in the use of social media and mobile devices. They reported relying heavily on a mobile device and specified that tablet computers such as the Kindle and iPad were used more commonly for entertainment, and that smart phone devices were employed heavily for all other uses, with news consumption, Internet searches, and social media being shared across the platforms.

The focus group also reported choosing which social media channels they would use as a public face and which they would try to keep domesticated through the use of strict privacy settings. All respondents had domesticated both mobile devices and social media, and most had also made the transition to professional uses. Several students talked about reinventing themselves on social media to reflect a more professional persona. They all expected future employers to review their social media presence before hiring them and realized the consequences of a less-than-professional presence.

Reflections of the instructor/researcher. I think back to my adoption of digital technology throughout the 1980s and 1990s, and I realize that I took an opposite path. I was trained on the use of digital innovations on company time. Through the 1980s, the newsrooms where I worked used mainframe computers, so there was no equivalent at home, just a typewriter. A later employer migrated from a mainframe system to a networked, PC-based one, and I learned Microsoft Word and the Internet on company time.

I did not purchase a cell phone for personal use until 2000, largely because by then the cost had come down significantly from previous generations of mobile technology. I learned how to text to keep in touch with my children. In 2005 my newsroom issued me a BlackBerry, which added email to my mobile capabilities, but I quickly stopped using it, because my personal cell phone was smaller and more convenient.

My exposure to social media began at home with America Online in 1997. I experimented with the chat function, but did not become active because of time constraints. Over the years I stayed active on AOL primarily to keep up with my children as they grew through their teens and started leaving the nest. I discovered MySpace at work, when some of my employees started going on the site during downtime in the workday. I joined Facebook when my children left MySpace for this new venue, because I wanted to keep up with them. I joined Twitter during a journalism conference that suggested I should. I am most active on Facebook largely because this is the channel that my family uses the most.

My experience in the adoption of digital media differs from my students', but the narrative might be less related to generation than to history. Early digital innovations were expensive and complex, requiring specialized knowledge to adopt, and therefore better suited to a workplace. Mobile technology and social media had low adoption costs and were easy to use without a long learning curve. I adopted this later digital technology on a domestic level before adapting it to professional use. The students have grown up with mobile devices and social media available to them at low cost and have not needed a larger institution, such as a school, to introduce this technology to them. One student, however, did credit his use of an Apple personal computer in school and the required keyboarding class as factors in his proficiency with his mobile device.

In thinking about the move from domestic to professional adoption of digital innovations, it is helpful to consider uses and gratification research into Internet usage, which shows that the greater the uses and gratifications, the more time people spend on the Internet (LaRose & Eastin, 2004). This would help explain why domestication of an innovation predicts its adoption (Peil & Röser, 2012). The subjects of this study, both students and researcher, seemed to translate their domestic use of mobile devices and social media to professional uses.

Negotiation of Professional-Personal Use of Technology

Actor network theory discusses a process of negotiation between the social and technological. It suggests that actors determine the usefulness of a technology and acknowledges the power of technology to shape the actors' perception and use of the technology (Elbanna, 2011; Plesner, 2009). The students in this study found themselves negotiating and renegotiating their relationships with the technology and its professional uses. As they reinvented their use of the digital innovations, they expressed frustration with the personal uses infringing on professional time and the professional uses imposing on personal space.

Student journals. Students wrote about the tension between their personal and professional lives. One student who used Twitter as an important news and sports source expressed frustration with the extent of his personal use of social media, writing, "I am surprised on how much time I can use strolling past my Twitter feed." Another noted that he tweeted about an interview after he had just completed it and encouraged his followers to stay tuned for the story. Several people marked it as a "favorite," leading the student to wonder: Are his followers really interested in the subject or are they hitting the "favorite" button because of their friendship? He concluded it didn't matter. "In this day and age, stories need to be shared and retweeted by everyone—your friends, family, etc."

One student found the professional uses she developed pushing fairly hard against the domesticated uses she described at the start of the semester. She wrote

I am beginning to feel like I am attached to my phone and that I always need to have it with me just in case someone calls me back about something relating to my story. I used to carry my phone everywhere with me to keep in contact with friends and family but now I dread having it with me and it is a relief when I am away from it for a few hours or so.

Another student created separate Facebook and Twitter accounts for professional and personal use, but noted that it would take time to gain enough followers on the new accounts to make them worthwhile. Still, it was a deliberate step toward reinventing an exclusively professional social media presence. Another student expressed concern about using her personal cell phone for professional uses because of the cost.

All of the students reflected on the blurring of lines between professional and personal, as well as the real versus the virtual worlds. The students used their personal online channels for professional work and brought some professional tasks into their personal world. They blurred the lines between virtual and real professionally, contacting sources in person, by phone, via social media, in whatever way they could.

Several students found that they had to resort to multiple channels of communication to reach sources, including email, texting, and phone calls. This surprised several of them. "I had assumed that email was a dead form of communication," one wrote. Another found over time that he preferred communicating with sources via text, phone, and email, leaving social media for personal communication and professional promotion. Other students, however, successfully used social media in their news-gathering process, reaching out to potential sources and crowdsourcing ideas. This process of negotiation and reinvention seemed to be ongoing, with one student who participated in the study both semesters noting toward the end that he rarely used social media for personal reasons anymore.

In the collaborative validation session in the spring 2014, students reflected on the changes and how much was attributed to professionalization and how much might be just growing up. They talked about reading posts from years ago and being embarrassed by the triviality of the content. These students remembered being introverted in their younger years and using social media to explore persona that were more outgoing. As they grew older, the students had not only realized the need for more professional appearances, but they also described themselves as more informed and less likely to react quickly and unreasonably to a post.

Focus group. In the focus group, the students talked about how they negotiated their relationship with social media, especially Facebook, through their high school years and into college. Part of the change occurred because the technology changed. They noted that when they started using Facebook, the site was restricted to their peer group, and they were heavy users. Once their parents got accounts, their engagement waned. "Too many olds," one said.

The more popular channel for these students was Instagram, and several noted a divide even within the millennial generation. Some of their older friends, 25 years old and older, were on Facebook while their younger ones, 25 and younger, used Instagram, and the students would go to the appropriate channel to find them. The students also viewed Facebook as the more professional channel and Instagram as a more personal one, illustrating another way to negotiate online identity. Snapchat had not launched during this study.

Digital Divide Among Digital Natives

Rogers' diffusion of innovations theory suggests adopters fall into one of five categories, based on the relative swiftness with which they adopt an innovation: innovators, early adopters, early majority, late majority, and laggards. The Pew Research Center's Internet & American Life Project survey (Duggan, 2013) found users in the millennial generation, ages 18 to 29, ahead of the curve in the diffusion of innovation. The survey in 2013 showed 73 percent of "digital natives" received email on their mobile device, but that left 27 percent who did not. It showed 64 percent recording video, a function many reporters are being asked to do as part of "backpack journalism," but that left 36 percent, or more than a third, not using their mobile device for this purpose. A more recent Pew Research Center survey indicates 32 percent of young adults 18-29 consume news on social media (Mitchell, Gottfried, Barthel & Shearer, 2016). While this is significantly higher than their baby boom and older peers, it is not even a majority. While student journalists might be expected to be more media savvy, it is clear that there is a digital divide within the millennial generation.

Student journals. Most of the students indicated in their journals that they were not only comfortable with their mobile devices and social media, but that they were willing and even eager to expand their uses to professional ones. But two students out of eight expressed choices that kept them on the analog side of the digital divide. One expressed discomfort with "big digital," or the ability of large digital corporations to control her life. She noted, "Mobile phone companies have (smartly) worked to blur the lines between the two spaces. … I am not opposed to existing outside of that arena." This student described herself as "huge on social media," but she was suspicious of corporate providers who encourage integration of mobile and social media.

Another student began the semester noting that she used her house phone for all calls except for family members who need mobile-to-mobile connections to keep their costs down. She owned two prepaid phones, which allowed her as much mobile capability as she could afford in a given month, as well as a mini-tablet that gave her connectivity whenever she had wireless access, which on campus was most of the time. Cost was an issue. Two months into the study the student reported that she stopped paying for cell phone service because of budgetary issues. She still had connectivity through her mini-tablet, but no longer texted or made cell calls.

This student not only made the cell phone a low priority, but she also expressed deep reservations about social media. She viewed the only appropriate uses of social media as news consumption and staying in touch with friends or family who were not local. "Social media to me makes me feel like you have to be popular. … I don't need them to validate me," she said. She chose to live outside the digital world, partly because of the cost to her budget, but also because of the potential cost to her self-esteem.

Focus group. In the focus group, one student out of twelve reported not having a smart phone. This compares with the latest Pew Research finding that 77 percent of Americans and 92 percent of people 18-29 own a smart phone (Pew Research Center, 2017). While smart phones are becoming ever more ubiquitous, this finding does indicate that advisers need to be aware of the digital divide and not assume that all new hires have all of the mobile tools or knowledge that their college media staff may assume. Advisers need to adjust their expectations to the digital resources students have or provide help obtaining those digital resources. They may also need to provide some training.

CONCLUSIONS

This study started with the research question: How do journalism students make the transition from using their mobile devices for personal expression to using these tools in a professional manner as future journalists? It found that these students' professional uses grew from personal ones, following domestication theory at a micro level. It also found that as students adopted professional uses, they had to negotiate how those uses affected their personal space, both online and offline. Students who had disengaged from the digital world were not willing to re-engage for professional reasons. They found ways within their limited digital comfort zone to conduct the required professional activities.

These findings support the domestication theory and uses and gratification research, noting that when student journalists find mobile devices and social media useful at a personal level, they are more likely to adopt them in a professional manner.

LIMITATIONS AND FUTURE RESEARCH

While these findings are not generalizable because of the small sample size and length of the study, they are useful to direct future research. This study also does not address some relevant questions, such as how much time students spend on social media versus other media and whether LinkedIn better prepares students for professional use of social media. The data and analysis from this research may be used to guide future surveys that could give a more generalizable view of student journalists and their use of mobile devices and social media.

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