



Full Court Press: Fighting Restrictions on Student Journalists At Private Universities

Abstract

Research and advocacy on student press freedom at the collegiate level often occurs in the context of laws on free expression and open government. However, student journalists at more than half of U.S. colleges and universities—those that are private rather than public—are not protected by the First Amendment and sunshine laws. Due to their lack of legal protections, scholars have suggested that student journalists at private institutions may choose to self-censor rather than report on campus controversies. This case study focuses on three instances when collegiate journalists at a private institution did not self-censor, but rather took the opposite approach, reporting aggressively on student press freedom conflicts. Our content analysis finds the depth and breadth of coverage—a “full court press” approach—suggests strategic attempts by student journalists to use media effects models such as agenda setting, priming, and framing to mobilize support for press freedom and ward off potential retaliation by administrators.

Keywords: college newspapers, press freedom, private institutions, media effects, agenda setting, framing

Collegiate journalists have long experienced pressure from administrators to avoid publishing certain types of content. Pressure from administrators can include threats to withhold funding, punish and/or remove advisers and/or editors, and impose new controls such as prior review (Kasior & Darrah, 1996). The loss of funding is a particular concern; more than half of collegiate newspapers receive direct funding from their respective institutions (Sparks, Greenberg, Rillo & Alarcon, 2024). Student newspapers may also depend on their institutions for other resources, such as office space and utilities (Bodle, 1996). Concerns about the possibility of losing institutional support have only been exacerbated by the larger

financial woes plaguing higher education; colleges and universities are actively looking for ways to cut expenses (Alexander, 2020). The precarious state of college newspaper funding comes at a time that student journalists are increasingly being called upon to fill gaps in local news reporting, which has been experiencing its own financial struggles (Blatchford, 2018; Blazina, 2022). Administrative pressure on student newspapers has led to recommendations by media advocacy organizations to seek financial independence and appeal for support from alumni and other networks (Etheridge & Rank, 2020).

Literature Review

Tinker v. Des Moines Independent Community School Dist. (1969) was the first U.S. Supreme Court case to establish that students, at least at public institutions, enjoy First Amendment protections. The Supreme Court ruled in favor of three junior high school students who were suspended after they refused to remove black armbands they wore to protest the Vietnam War. The court's 7-2 decision found neither students nor teachers "shed their constitutional rights to freedom of speech or expression at the schoolhouse gate" (*Tinker v. Des Moines Independent Community School Dist.*, 1969, para. 10). First Amendment protections apply to student speech in public schools, the Court ruled, unless their speech disrupts academic activities. The *Tinker* standard has been understood to apply to speech at public colleges and universities as well (Etheridge & Rank, 2020). However, some scholars have noted that what is considered a "disruption" can be subject to wide interpretation. Chemerinsky (2023), for example, argued "the courts appear willing to give so much deference to school officials and are willing to assume a disruption even when there is no evidence of one" (p. 24).

Another Supreme Court case, *Hazelwood School Dist. v. Kuhlmeier* (1988), addressed the rights of school administrators to censor student publications. In this case, a high school principal removed articles about teen pregnancy and divorce from the student newspaper, maintaining the content was inappropriate. The Supreme Court ruled 5-3 in favor of the school district on the basis that the newspaper was only a "limited" public forum, since it was produced as part of a journalism class. As a publication that was part of the school's curriculum and funded by the district, the Court found it was subject to editing and approval by school administrators.

Although the *Hazelwood* case centered on a high school newspaper, some federal courts have applied the ruling to speech on college campuses as well. Most notably, in *Hosty v. Carter* (2005), the Seventh Circuit Court of Appeals dismissed the claims of student editors at Governors State University in Illinois who said their newspaper was unfairly shut down. Governors State administrators who were upset by articles critical of the university ordered future editions of the newspaper to be subject to prior review. In dismissing the editors' claims, *Hosty* was the first case at the federal circuit level to apply the *Hazelwood* decision to higher education. Student press advocates argued this approach was misguided, since the

Hazelwood ruling was based in part on the age and maturity of the students involved. Applegate (2005) also argued “the structure of high school and college programs is too dissimilar” (p. 275) for *Hazelwood* to apply. Collegiate publications are also more likely to be extracurricular, and thus should be considered public forums, rather than “limited public forums” like the newspaper in *Hazelwood* (Bodle, 1996). Finally, collegiate publications often receive some funding from sources (such as advertisers) outside their respective institutions, suggesting they have greater autonomy than high school newspapers. In response to *Hosty*, student press advocates recommended collegiate newspapers procure statements from their respective institutions clarifying that their publications were “designated public forums” as a defense against future censorship (e.g. Student Press Law Center, 2005). Advocates also warned that *Hosty* and subsequent rulings that have applied *Hazelwood* to higher education have also led to ambiguity in how courts could rule in the future in cases related to other forms of expression at the collegiate level, including emails between students and professors, flyers posted on campus, and speech that occurs off school premises (Harris, 2005; LoMonte, 2013).

Some state constitutions have provisions related to student press freedom, which can provide additional protections for collegiate journalists. Since 2000, 18 states have passed so-called “New Voices” laws intended to increase speech protections for student journalists (Student Press Law Center, 2024). Some laws focus on K-12 students, while others include collegiate journalists (Student Press Law Center, n.d.) California’s Leonard Law is notable for protecting the speech of high school and college students, including those at non-religious private institutions. It also bars the prior restraint of student journalists. Still, one critic notes that the law only allows students at public schools to sue both their institutions and administrators; students at private schools may only sue their institutions. The Leonard Law also only allows current, not former, students to sue (Ross, 2007). Rhode Island’s version of “New Voices” also protects collegiate journalists at private institutions (Norins, Harmon-Walker & Tharani, 2021).

Open government laws are also important to the practice of journalism by ensuring public access to meetings and records. Open government laws, also called “sunshine laws,” exist at the federal level, but state laws are more applicable to journalists covering local issues, including issues related to most colleges and universities. Open government laws can vary by state, but generally adhere to a presumption of openness; in other words, government meetings are generally presumed to be open to the public, and records pertaining to government operations are generally presumed to be available to the public, unless specifically exempted by state law. State open government laws may, for example, require university boards to advertise meetings in advance and allow the public to attend. Presidential searches may also be required to be open, in addition to records related to salaries, tenure, and donors (Hearn, 2017). Whether state open government laws apply to student government meetings is less clear (Student Press Law Center, 2018).

Debates about collegiate student press freedom often omit or under-emphasize the fact that such debates are almost exclusively centered around *public* institutions. Public institutions are considered state actors and thus have First Amendment protections, even though those protections do not always prevent administrative interference in student journalism (Etheridge & Rank 2020). Open government laws, which vary by state, also generally apply only to public colleges and universities (Hearn, 2017). Private institutions, which actually outnumber their public counterparts in the U.S., operate instead as “pseudo-public spheres” (Salzano & Lisosky, 2017) and are thus not constrained by the First Amendment or open government laws (Robinson, 2023). This difference is commonly misunderstood and/or miscommunicated in student press freedom literature (Trachtenberg, 2018).

Although student journalists at all colleges and universities may experience administrative pressure, those at private institutions are particularly vulnerable. Policies on free expression and open government at private institutions vary widely and may not be well publicized among students. Some studies have suggested that private institutions often subject student newspapers to prior review and impose restrictions on lewd content (Bickham & Shin, 2013). Policies on free expression and student media may also be spread amongst numerous documents, such as student and faculty handbooks, codes of conduct, and administrative records (Student Press Law Center, 2020).

Some private institutions have policies suggesting support for First Amendment-like protections. Statements affirming the right to free expression “can become binding as law, as part of the contract between the private school and the student” (Dayton & Tarhan, 2021, p. 7). One study found four common themes among statements at private colleges and universities affirming the right to free expression: “the idea of free expression as an education good, the responsibility of using expression in ways that did not harm others or the larger campus community, a conflation of free speech with conflict and alignment with public institutions or constitutional law” (Salkin & Messke, 2021, p. 14). Still, the presence of statements supporting free expression does not necessarily guarantee administrators will adhere to them. Chapman University, for example, required its student newspaper, *The Panther*, to submit an article for prior review in 2019 despite the private institution’s policy supporting free speech on campus. The university’s president reversed course after the newspaper wrote an editorial opposing the restriction (Rank, 2019).

In some cases, a policy developed by one private institution has served as a model for others. Yale University’s Woodward Report, which declared “The history of intellectual growth and discovery clearly demonstrates the need for unfettered freedom, the right to think the unthinkable, discuss the unmentionable, and challenge the unchallengeable,” (Woodward, 1974, p. 5) was considered at the time to be groundbreaking. The University of Chicago’s Freedom of Expression Committee created a statement in 2015 guaranteeing all members of its community “the broadest possible latitude to speak, write, listen, challenge, and learn” although it also cautions that “does not, of course, mean that individuals may say whatever

they wish, wherever they wish” (p. 2). The University of Chicago’s statement has since been adopted by at least 100 other institutions (Foundation for Individual Rights and Expression, n.d.).

Private institutions face competing pressures when determining, and enforcing, policies on student speech. While administrators may want to encourage freedom of expression, they may also be concerned about bullying, racist, and other speech that can inhibit efforts to provide an inclusive campus environment (Chemerinsky & Gillman, 2017). Codes limiting freedom of expression became widespread on college campuses beginning in the 1980s due to increased concerns about racial and other tensions (Majeed, 2009). Some legal scholars have suggested that requiring private institutions to offer First Amendment-like speech protections and open government laws could cause more harm than good (McLendon & Hearn, 2006; Trachtenberg, 2018). Some even maintain that administrators at public colleges and universities should be allowed to exert more control over student media than the First Amendment allows (Bohman, 2005).

The lack of First Amendment protections at private colleges and universities may make student journalists at those institutions less likely to report on controversial issues, particularly when they involve conflicts with university administrators or policies. One study found student newspapers at private institutions tended to cover press freedom in general terms, rather than report on specific acts of censorship involving their own publications (Hettinga, Medders, & Docter, 2022). Student newspaper advisers and editors at private colleges and universities have also reported feeling less comfortable with publishing articles about controversial topics, suggesting they may be more prone to self-censorship than their counterparts at public institutions (Filak, 2012).

However, media effects theories suggest that collegiate journalists who take the opposite approach may be able to use the power of the press to fight attempts by administrators to control their content. Media effects models include agenda setting, priming, and framing (Scheufele & Tewksbury, 2007). Agenda setting theory holds that journalists shape reality with the choices they make in which stories to cover, how prominently those stories are featured, and how frequently particular topics are covered (McCombs & Shaw, 1972). In short, journalists communicate the salience of specific issues and stories in the choices they make about what to cover. Priming is considered an extension of agenda setting and refers to the “impact of news coverage on the weight assigned to specific issues in making political judgments” (Iyengar & Simon, 1993, p. 368). Framing relates to how journalists cover issues. That is, journalists choose certain facts and exclude other facts “in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation” (Entman, 1993, p. 52). Frames commonly applied in news content analyses include those of conflict, human interest, economic consequences, morality, and responsibility (see, e.g. Semetko & Valkenberg, 2000).

Research on media effects models in college newspapers is limited. A study of college newspaper editorials on COVID-19 found morality and economic frames dominated (Fleming & Dolan, 2020). A content analysis of collegiate newspaper articles on drugs and alcohol found few articles used frames related to addiction detection, intervention, or treatment (Atkin & DeJong, 2000). A similar study focused on messages related to vaping found college newspapers more often explained how lung problems could develop over time rather than communicating messages of risk and action (Akhther & Islam, 2024). Another study focused on strategic framing by student LGBTQ activists who organized confrontations with religious preachers who visited college campuses. Researchers recognized the intentional use of “highly symbolic” tactics that helped activists achieve visibility, including through coverage in student newspapers (Barringer, Savage, & Howard, 2023, p. 505). Other studies have similarly noted tactics used by activists that can help them influence the media agenda (e.g. Grömping, 2019; Wouters & Lefevre, 2023).

Journalists generally do not consider themselves activists, due to professional norms and codes of ethics discouraging them from political speech, and thus may shy away from suggestions that they use agenda setting, priming and/or framing to persuade audiences. The Radio Television Digital News Association’s code of ethics, for instance, warns that “political activity and active advocacy can undercut the real or perceived independence of those who practice journalism” (Radio Television Digital News Association, n.d., para. 7). However, some news organizations make an exception for advocacy related to press freedom; for example, NPR’s policy allows journalists to “express support for democratic, civic values that are core to NPR’s work,” (McBride, 2021, para. 4) including freedom of the press. On the other hand, the *Wall Street Journal* fired correspondent Selina Cheng after she became chair of the Hong Kong Journalists Association, because, according to her, the newspaper “did not want its reporters seen calling for greater freedoms” (Cheng, 2024, para. 12). Observers have noted that advocating for press freedom can be seen as more controversial in less democratic countries (Simon, 2023).

This case study examines how student journalists at a private institution have covered controversies related to free expression and access to information, despite the risk of retaliation by university administrators. While prior research suggests collegiate journalists may opt simply not to cover such controversies, research on media effects models suggests that journalists could mitigate the risk of censorship by taking the opposite approach: not just covering those controversies, but covering them aggressively—a “full court press.” University administrators may hesitate to restrict student newspapers if they believe doing so would reflect poorly upon their institutions. In fact, the Student Press Law Center has suggested university administrators might be deterred by student journalists who fight back, or if publicity about the controversy “might have a negative impact on next year’s enrollment figures or fund-raising totals” (Student Press Law Center, 2020, para. 10).

Methods

This research takes the form of an instrumental case study to explore how student journalists at one private university covered controversies related to free expression and access to information, despite the risk of retaliation by school administrators. This study is based on coverage of three conflicts related to student press freedom at Pace University, a private institution based in the New York City metropolitan area. The articles were written by staff members of *new morning*, the student newspaper at Pace University's second-largest campus in Pleasantville, NY. *new morning* was in operation from 1971 to 2001. Its publication schedule varied. In some years, issues were published weekly; in other years, the newspaper came out every other week. An average issue of *new morning* was eight pages long.

The three controversies in this study emerged as part of a larger content analysis of changes in style, formatting, and topics covered in Pace University student newspapers over the Pleasantville campus's roughly 60-year history. Articles were sampled every five years, with some exceptions due to gaps in the university's student newspaper archive.

Findings

Three controversies related to student press freedom were identified in the sample, in the years 1972, 1985, and 2000. In each instance, we find that *new morning's* coverage suggested attempts to protect itself from administrative backlash by employing a "full court press" approach. That is, the newspaper covered these controversies not just once; rather, several journalists were assigned to cover the controversies from a variety of angles over multiple issues. The newspaper also strategically incorporated a variety of content, including editorials, columns, supportive letters to the editor, and even a cartoon.

Open Meetings (1972)

The first example of a student press-related controversy was coverage of an effort by members of the student government in 1972 to send representatives to Faculty Council meetings as non-voting observers. The monthly meetings had been closed to students since the Faculty Council's inception in 1965.

Agenda Setting

new morning editors signaled that this controversy deserved student attention by covering it over multiple issues and placing articles about it on the front page, two indicators of agenda setting. The first article on the controversy, "Closed door: DSGA seeks admission to faculty council," appeared on the front page of the February 26, 1972 issue and featured a photograph of the Faculty Council's chairperson. The next issue on March 10, 1972 also included a front-page article on the controversy: "Faculty Council: Open door policy or absolute privacy needed?" The controversy was covered one last time in *new morning's* next

issue on March 24, 1972: “Resolution: Faculty Council to admit press observer.” This time, the article appeared on the back page, a signal of diminished newsworthiness: crisis averted, time to move on to other things.

Priming

new morning attempted to prime its audience to support student access to these meetings by complementing its coverage of the controversy with other news related to the Faculty Council’s activities. As the legislative body representing faculty interests on campus, the Faculty Council often makes decisions that are newsworthy to a student audience; by covering such decisions, the student newspaper communicated their salience. Indeed, in the same February 25, 1972 issue in which the open meetings controversy broke, *new morning* reported on two other Faculty Council matters: the tabling of a proposal to let students evaluate their professors each semester, and the approval of a tuition increase. Both articles also appeared on the front page—in fact, the entire front page of that issue was dedicated to news about the Faculty Council. All three articles also jumped to inside pages. In the second issue to cover the open meetings controversy on March 10, 1972, *new morning* ran a story about a Faculty Council decision to seat students as voting members on one of its standing committees. The article quoted students and faculty who believed other committees should also add student members, and be more transparent about their work. Finally, the back page of the March 24, 1972 issue featured not only a story about the admittance of a “press observer” to Faculty Council meetings, but also another article about the professor evaluation proposal: it had been approved.

Framing

new morning’s coverage of the open meetings controversy included conflict, morality and responsibility frames. The newspaper conducted a poll for its March 10, 1972 issue asking students and faculty their opinions on the meeting policy. Results brought the conflict into sharp relief: students were overwhelmingly in favor of opening the meetings, while faculty were divided. Quotes from students often presented morality-based arguments. For instance, a student government representative noted that administrative staff were allowed to attend Faculty Council meetings, thus meaning that “the student body is the only faction in the Pace Community to be barred.” Another student said, “It’s our money. We should know what’s being done with it.” The provost was also asked about the fact that student journalists were allowed to attend Faculty Council meetings on Pace’s other campus and was quoted that it “has caused no problem,” thus suggesting that Pleasantville faculty were responsible for the controversy. The final article on March 24, 1972, while noting the Faculty Council’s decision to admit a student journalist, also included caveats. First, a student journalist would only be allowed to attend Faculty Council meetings “at the discretion of the Executive Committee.” Also, members of student government would still be excluded—and they had led the charge to open meetings in the first place.

Censorship (1985)

In 1985, *new morning* covered the censorship of Pace University's other student newspaper, which operated on the main campus in New York City. The *Pace Press* had published an article on AIDS that included explicit language and descriptions of sexual acts. Administrators responded by suspending the newspaper, seizing about half of the issue's print run and ousting the newspaper's editor-in-chief.

Agenda Setting

new morning's December 9, 1985, issue included three articles on its front page about the controversy. The first article, "Suspension of *Pace Press* lifted," ran full-width at the top of the page and included a photograph of the university's president. Two other articles focused on reactions to the newspaper's suspension: "Experts critical of Pace's reaction to AIDS article" and "Former editors also critical." All three articles continued inside, combining to fill an additional page. The issue also included a staff editorial, "Why Pace doesn't have a free press," a letter to the editor from an alumnus decrying the censorship, and an editorial cartoon that satirized the seizure of the copies.

new morning continued to cover the *Pace Press* story after students returned from winter break. *new morning*'s January 21, 1986, issue included reprints of columns that had run in two professional newspapers, the *New York Law Reporter* and *Gannett Westchester*, both of which criticized the university's actions. Additionally in that issue, a column by a *new morning* staff member recounted previous examples of censorship in Pace University student newspapers.

Priming

Although they are part of the same institution, Pace University's two campuses are far enough away from each other that students perceive them as having separate identities and generally spend time only on one. Student organizations also operate mostly independently from each other. The two campuses have always had separate student newspapers, for example. By covering the controversy at the *Pace Press*, *new morning* thus signaled that, in this instance, students in Pleasantville should be aware of a controversy based on the "other" campus.

Framing

Articles focused on two themes. One was that administrators had made a draconian decision that was "not at all enlightened," as the *Gannett Westchester* column put it. Quotes from professional journalists and press advocates acknowledged the *Pace Press* article had been in bad taste, and that the university had the right to censor the newspaper, but nonetheless the decision reflected poorly on administrators. *new morning* also noted that the university had revised its student press policies less than a year before the controversy. That fact was included in the lede of the top article in the December 9, 1985 issue:

In a series of events lasting three weeks and coming 10 months after Pace Chancellor Edward J. Mortola issued an Editorial and Circulation policy in order to establish guidelines for the student press, the university suspended the *Pace Press*, forced its editor, Brian Sookram, to resign and had the newspaper elect a new editor.

The article also described as “ironic” Mortola’s invocation of the Editorial and Circulation policy to defend the censorship (the policy required that news reporting be in “good taste”). *new morning* noted the policy had been created in response to the seizure of *Pace Press* issues the year before, when the newspaper had reprinted a Forbes magazine article critical of the university’s business school. “The policy was meant to prevent future confiscations of student newspapers,” the *new morning* article said. The article portrayed the ousted editor-in-chief as being blindsided by a demand that he defend the newspaper’s reporting in a special meeting of the Faculty Council’s Publications Committee. “They just threw everything at us without telling us what to prepare for,” the *new morning* quoted Sookram. “It was very unfair.”

The other major theme in *new morning*’s coverage of this controversy was that, although Pace did not have to abide by the First Amendment, it had violated the “spirit” of it. Reaction articles included only quotes that were critical of the university’s actions. Quotes came from outsiders, including from the leader of the New York division of the American Civil Liberties Union, the Student Press Law Center, a Columbia University journalism professor, and a “First Amendment expert” at the Village Voice; as well as from insiders, including five former editors, a former adviser, and a Pace journalism professor. A letter to the editor from an alumnus who went on to work at 60 Minutes questioned, “How can students understand what it means to live in a free society unless they experience it?” The staff editorial noted that student journalists at Pace did not have First Amendment protections: “Happily for the university, Pace can stand behind its private university status and claim it behaved legally. Ethically though, the university hasn’t a leg to stand on.” And the January 21, 1986 column by a *new morning* staff member reiterated the public-private distinction, arguing that the actions of administrators “would be an illegal violation of First Amendment press-freedom rights had Pace been a public university.”

Adviser Firing (2000)

new morning’s faculty adviser was fired February 11, 2000, apparently because administrators believed the newspaper was not being productive enough to justify the amount of funding it was receiving from the university. According to *new morning*, Dean for Students Jack Gentul criticized adviser Donna Cohen for allowing the newspaper’s publishing schedule to become “erratic,” and for staff members to produce less work than they used to, suggesting they were overpaid.

Agenda Setting

Like the other two controversies in this study, *new morning* dedicated multiple issues to coverage of the conflict. The first issue was a rare special edition on February 17, 2000, with all four pages dedicated to coverage of the firing. The story “Gentul’s actions yield uproar” occupied the entire front page. The rest of the issue included three reported articles: one about the staff paying tribute to Cohen, one about other instances of administrative interference in *new morning*’s operations, and an explainer piece about the control Pace administrators exert over student organizations that receive university funding. The issue also featured other pieces critical of the firing, including a staff editorial, a column by the newspaper’s managing editor, and three letters to the editor.

By the newspaper’s next issue on February 24, 2000, Cohen was back. *new morning* covered her reinstatement in a front-page article (“*new morning* battle brings back Cohen”). Inside, a staff editorial praised the university’s change of heart. Three more letters to the editor criticized Cohen’s firing. Finally, on March 7, 2000 (a later than usual publication date that editors explained was due to the special edition they published on February 17), *new morning* ran two other articles that were related to the reasons administrators had given for Cohen’s firing. One article described the attempts of student government leaders to rein in *new morning*’s publishing schedule. Another article covered an announcement by a university administrator that he was reviewing procedures for allocating tuition remission to staff members of *new morning* and other publications. The March 7, 2000 issue also included a staff editorial accusing the student government of undue secrecy, a column by the managing editor that called for Gentul’s resignation, and three letters to the editor: one that supported Gentul, one by Gentul himself, and one that sided with *new morning*.

Priming

By publishing a special issue with content solely about Cohen’s firing, *new morning* communicated to its audience a sense of urgency and deviance. Continuing to cover the controversy beyond Cohen’s reinstatement, and broadening its coverage to include disgruntled members of other student organizations, signaled to readers that *new morning* staff members did not see the conflict as fully resolved.

Framing

new morning’s coverage was again heavily reliant on sympathetic sources. The The initial article about Cohen’s firing appeared to be based entirely on her account of what happened. Gentul was also quoted, but his comments were limited to claims that *new morning* staff were among the highest-paid staff members of collegiate newspapers in the country—claims that were disputed by the former president of the College Media Association. The article also quoted three Pace professors who were critical of Cohen’s firing. Finally, the article heavily referenced *new morning*’s constitution, which specified that the adviser is chosen by the editor-in-chief, does not exercise editorial control, and cannot be dismissed by the university without cause.

Morality frames were frequently used, as they had been in the other two controversies. “It is absolutely imperative and vital that the students have a feeling of absolute freedom to express their view,” one professor was quoted. An editorial depicted Cohen’s firing as “an infringement on our First Amendment rights.” Letters to the editor depicted the controversy as a power grab by Gentul, an attempt to turn the newspaper into “a PR extension of the university,” and “the single greatest threat to student freedom of the press in *new morning’s* 28-year history.”

Discussion and Conclusion

This study is limited to coverage of student press-related controversies at one private institution. Thus, we are unable to conclude whether student journalists at other private institutions have similarly used “full court press”-style tactics to mitigate the risk of censorship by administrators. Because this is a study based on content analysis, we are also unable to determine the extent to which censorship was a serious risk, or was perceived to be, for student journalists at Pace University at the time these articles were written. Thus, it is difficult to know whether “full court press”-style tactics affected the ways these cases were resolved, or the likelihood that they would be punished for covering these controversies. Opportunities for future research could include interviews with student journalists at private universities who encounter similar controversies to gain insights on how they strategize—or do not strategize—their coverage.

Despite the limitations of this study, it is clear that coverage of these three student press-related controversies was outside the norm for *new morning*. The sample of issues that we examined included few other topics that were covered in such depth, with such frequency, and with the same prominence. Thus, while pressures on student journalists at private institutions may often prevent them from fighting administrative threats to press freedom, coverage of these three student press freedom controversies suggest that students may take the opposite tack: an aggressive, “full court press” approach that may discourage administrators from retaliating. In the case of *new morning*, this approach consisted of continuing coverage across multiple issues, often on front pages, and complemented by articles and opinion pieces that primed their audience to support press freedom and transparency as general principles, despite the lack of applicability of the First Amendment and open government laws to private institutions. Frames portrayed students as advocates of press freedom and administrators as secretive, unenlightened, and over-controlling.

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