

Campus Free Speech in Contested Times: What do College Handbooks Say About Free Speech?

What free speech do colleges actually *say* they will protect? While there has been much recent media focus on campus free speech in the wake of major protests over the Israel-Hamas War, and the subsequent targeting of international students who exercised their free speech in those protests by the Trump administration, there has been little to no research on what kinds of speech these universities purport to protect. This study attempts to begin to fill that gap by coding and content analyzing the free speech codes of over twenty-five college and university student handbooks in the state of Georgia. In doing so, it attempts to answer some basic questions about the content of these handbooks and make some basic comparisons. This research will create an objective baseline from which we can compare changes in campus free speech over the course of the Trump administration. It also describes the database, with the hope to expand to include more student handbooks over time and can help generate future research on this emergent and important topic.

There has been little to no research on the free speech policies on college campuses, although there has been some research on individual case studies of students making denial of free speech claims, and some more systematic works. Still few, if any, studies have examined actual free speech codes. This research will serve the following purposes. First, it will provide a baseline from which to compare any changes in free speech policies that occur at colleges and universities under the Trump administration. It will also answer the question, just what speech do universities say they will protect? This will allow a comparison between the actual actions of universities to see if they do what they say. The data will also provide insight into the differences

between the speech codes of private versus public universities, such as is one type more or less likely to protect speech? Are there differences in the type of speeches these schools protect? Or do for-profit universities protect free speech? Are there differences between colleges based on their size? The expectation is that there should be, if only because with more students comes more potential issues related to students speaking out.

This study then provides an example of a college with a very expansive free speech code, to help the reader understand what types of speech these handbooks discuss. It also provides an example of a school with the least protective free speech code. By providing the ends of the spectrum, the hope is to give a little better understanding of the free speech codes themselves. This study aims to serve as a baseline for future research on campus free speech, by building a database of coded student handbooks that can fuel additional study.

A Word Cloud editor was used to compare the content in twenty-eight private and public college student handbooks from schools located in the state of Georgia. Various comparisons across university types allow the study to draw some interesting conclusions. It begins with a review of the previous research on student handbooks and related research on cases of alleged and actual censorship of student speech, then the methodology is explained. The Word Cloud results are used to identify similarities and differences in what speech colleges and universities purport to protect. The study concludes with some results, discussion, and ends with some suggestions for future research into this area.

Literature Review

The previous research on speech codes can be placed into two general groups. The first are those studies that try to gauge the overall climate of free speech on college campuses, and use published free speech codes as part of the assessment. The second, and the far more numerous

group, include case studies of high-profile legal cases dealing with censored student speech.

There has been little research into the actual language in college student handbooks. Most of the research stems from the non-profit organization, the Foundation for Individual Rights in Education (FIRE), which is dedicated to defending student expression on college campuses or focused on the outcome of notable court cases related to campus speech. Since 2006, this organization has published an annual “Spotlight on Speech Codes.”¹ This report is based on student responses to FIRE’s spotlight survey. Based on these surveys, FIRE creates a four-tiered spotlight ranking, with green given to schools that, based on the surveys, FIRE concludes does not seriously restrict free speech, yellow meaning FIRE has concluded the school only imposes vague regulations on expression, red, is for schools that have policies that substantially restrict free expression, and a fourth category, a “warning” category for those schools that FIRE deems is trending against free speech.²

While these reports provide rich detail about civil liberties on those campuses with enough respondents to generate meaningful data, it often means their database overlooks many smaller schools. Still, the reports can, for those schools with overlapping data, provide interesting comparisons. The key takeaway of this study is that it provides the first comprehensive measurement of college free speech codes.

Since 2020, FIRE has also published another report based on the Spotlight surveys, their annual College Free Speech Rankings.³ The 2025 Spotlight survey had over 58,000 respondents.⁴ These annual Rankings can provide an excellent estimate of the attitudes and perceptions of the average college student. As a source of comparison, the annual rankings report relies on response rates from students rather than the handbook, which limits the number of schools it covers. The different units of analysis aside, they do make for insightful comparison.

The most useful aspect of this comparison was the spotlight ranking mentioned above. The ranking is based on each institution.

Apart from the FIRE reports, there has been no systematic research on the content of the free speech codes in college student handbooks. According to FIRE's "Spotlight on Speech Codes 2013," universities began writing speech codes beginning around the late 1980s.⁵ It is perhaps because these codes are new that research on them is so sparse. Most of the research on campus free speech has not looked at the expression colleges actually purport to protect, but on individual cases where free speech was allegedly or actually violated, often resulting in a legal case. While tracking these cases over time may give an ambiguous measure of the overall trends on free expression, they are case studies and can miss the experience of college students on most campuses.

The other area of research focuses on high-profile court cases related to campus free speech. The First Amendment guarantees freedom of speech to all Americans, protecting the right to speak freely even when that speech is controversial. However, how freedom plays out on college campuses is more complex, as universities try to balance student expression with campus safety and inclusivity. Although there have not been an immense number of legal cases, the existing ones provide essential insight into how the law views students' freedom in higher education.

Most of the scholarly and media attention on freedom of speech on college campuses centers on landmark court cases that outline how the protections of the First Amendment will be enforced in higher education. These cases provide significant insights into the boundaries of students' constitutional rights and institutional authority. However, they also serve primarily as case studies, highlighting moments of conflict between students and the university.

Foundational cases establishing students' rights

The Supreme Court's ruling in *Healy v. James* (1972) recognized a turning point in protecting students' rights to freedom of speech at public universities.⁶ In this case, Central Connecticut State College refused to officially recognize a local chapter of Students for a Democratic Society (SDS). Due to concerns about its potential association with disruptive activities linked to the national SDS organization. The denial of recognition for SDS meant that the chapter could not access campus resources, such as shared meeting spaces, rooms, or funding. The students argued that the denial violated their First Amendment rights to freedom of speech and association. The college justified its decision by claiming it was necessary to prevent disruption and to maintain a safe learning environment. The case presented the legal question of whether public universities could limit their students' expression based on speculation of disruption. Using *Tinker* as a foundation, the Supreme Court emphasized the importance of the First Amendment in higher education. The courts stated that state colleges and universities are not "enclaves immune from the sweep of the First Amendment."⁷ The decision reinforced students' rights while allowing schools to impose reasonable, non-infringing regulations to maintain campus order.

A year later, in *Papish v. Board of Curators of the University of Missouri* (1973), the boundaries of the First Amendment were further defined.⁸ In this case, the Supreme Court considered whether a public university could expel a student for distributing offensive materials, specifically an underground newspaper containing explicit content. The newspaper in question contained a political cartoon that depicted a policeman raping the Statue of Liberty and the Goddess of Justice with a headline that read, "*Motherfucker Acquitted.*" The university defended its action in expelling Barbara Papish by claiming the content could disrupt campus order. Papish

challenged the expulsion, arguing that it violated her First Amendment right to free speech. The case went to the Supreme Court, addressing whether public universities could suppress student speech solely based on its offensive content. The court ultimately ruled in favor of Papish, stating that public universities cannot expel students for distributing offensive materials unless the speech causes a substantial disruption to the university. This decision reinforced the protection of free speech in academic settings; it is established that even offensive speech is protected under the First Amendment unless it causes significant disturbance.

Expansion and Limits of the First Amendment's Boundaries

Later cases tested the extent to which these rights could be applied. In *Widmar v. Vincent* (1981), the Supreme Court ruled on whether a public university could deny access to campus facilities for religious worship.⁹ The students of Cornerstone, a Christian student group at the University of Missouri-Kansas City, claimed that the denial of access violated their First Amendment rights to freedom of speech and association. The court ruled that once a public university creates an open forum for student expression, it cannot discriminate against religious groups based on the content of their expression. Justice Powell's majority opinion further emphasized the significant precedent by reaffirming the principle of viewpoint neutrality under the First Amendment.¹⁰

However, not all rulings expanded the protections of the First Amendment. In *Hosty v. Carter* (2005), the Seventh Circuit Court of Appeals addressed whether public universities could impose editorial control over student-run newspapers.¹¹ The case began when Patricia Carter, the dean of student affairs at Governors State University, ordered the student newspaper, *The Innovator*, to seek her approval before publishing. This request followed the paper's previous publication of articles critical of the university's administration. The university claimed it had the

authority to regulate the content of school-funded publications. The legal question in this case was whether the *Hazelwood v. Kuhlmeier* standard, which allows high schools to limit student publications not designated as public forums, would also apply to colleges. The Seventh Circuit ruled in favor of the university, stating that administrators could regulate its content if a college newspaper is not a public forum. This decision was controversial as it suggested that college students might have fewer protections for free speech than expected, especially on university-funded platforms.

Similarly, in *Rosenberger v. Rector and Visitors of the University of Virginia* (1995), the court addressed the issue of religious viewpoint discrimination again.¹² The case came forward when the University of Virginia refused to fund *Wide Awake*, a Christian student newspaper. The university argued that funding religious content would violate the Establishment Clause of the Constitution. The paper's editor, Ronald Rosenberger, sued, claiming the University discriminated against their free speech based on its religious viewpoint. This case raised an important legal question: whether withholding funding from a student group based on its religious content constitutes a violation of the First Amendment. The Court ruled in favor of Rosenberger, stating that the university's refusal to fund the publication was unconstitutional viewpoint discrimination. This decision reinforced the notion that public universities must remain neutral regarding both religious and non-religious viewpoints when funding student groups.

In *Iota Xi Chapter of Sigma Chi v. George Mason University* (1991), the Fourth Circuit Court of Appeals addressed whether a fraternity could be sanctioned for hosting a "Dress a Sig contest (Dress coaches like ugly women)" considered offensive by university officials.¹³ The event, which was part of a "Derby Days" program, involved participants dressing as "ugly

women,” with one participant in blackface. Following this event, student leaders wrote a letter to the dean requesting the imposition of sanctions on the Iota Xi chapter of Sigma Chi. The university sanctioned the fraternity on the grounds of its perpetuation of racial and sexual stereotypes. The fraternity sued, arguing that the university’s actions violated their First Amendment rights to free speech. The Fourth Circuit Court of Appeals upheld the district court’s ruling, which ruled in favor of the fraternity. The court found the university’s actions to be unconstitutional and the “ugly woman contest” to be an expressive activity protected under the First Amendment. The decision emphasized that offensive speech is still protected under the First Amendment as long as it does not incite violence or disrupt campus order.

Modern Cases

Recent cases are evidence that disputes over campus expression continue, often shaped by policies restricting speech to specific zoning or requiring prior administrative approval. In *Uzuegbunam v. Preczewski* (2021), Chike Uzuegbunam, a student at Georgia Gwinnett College, was stopped twice from sharing his religious beliefs on campus despite being in a designated “free speech zone” and following the proper procedures.¹⁴ Uzuegbunam and another student, Joseph Bradford, sued, claiming the policy violated their First and Fourteenth Amendment rights and requested nominal damages. GGC later changed the policy and tried to have the case dismissed, arguing it was no longer relevant. Lower courts agreed, but the Supreme Court disagreed, holding that nominal damages are sufficient to maintain such cases. The Supreme Court ruled that even if a school or institution changes the policy, a lawsuit can still proceed if the plaintiff seeks nominal damages. This ruling was significant because it clarified that plaintiffs can still pursue justice for rights violations, even if the defendant claims the issue is “moot” by making changes after the fact.

In *Speech First v. Schlissel* (2019), the Sixth Circuit Court of Appeals examined whether the University of Michigan's anti-bullying and harassment policies violated students' First Amendment rights.¹⁵ Speech First, a free speech advocacy group, challenged the policies as overly broad, creating a chilling student expression. The group argued that the university's bias response teams would refer students to higher authorities when investigating complaints, which instilled fear in students that their speech could lead to consequences. This made students less likely to express themselves freely, which Speech First claimed violated their First Amendment rights. The Sixth Circuit allowed the case to proceed, recognizing that the restriction of speech does not always require enforcement to be harmful.

Similarly, in *Young Americans for Liberty v. St. John IV* (2022), the Alabama Supreme Court ruled that the University of Alabama's policy requiring advance permits for speech violated the state's free speech act by maintaining restricted zones.¹⁶ Joshua Greer, a member of the student-led organization Young Americans for Liberty at the University of Alabama, sued the university, challenging its free speech policy. The policy required students to obtain permits for free speech events and limited them to specific areas of campus. This policy conflicted with the Alabama Campus Free Speech Act, which prohibits the establishment of designated free speech zones.

In 2020, the University updated its policy to allow students to express themselves freely in certain campus areas without prior notice. However, in 2021, Greer and YAL contended that the University's policy still violated the law because students were required to obtain permission three days in advance. The University defended the policy, saying it was necessary for safety and to maintain its educational mission. In 2022, a lower court dismissed a lawsuit by Greer and YAL against the University of Alabama at Huntsville, saying the university's speech policy was

fair and did not violate students' rights. However, in November 2022, the Alabama Supreme Court reversed this decision. The Court affirmed that the policy violated the Alabama campus free speech act by creating designated zones for free speech, which the law prohibits.

Mahmoud Khalil: Federal Retaliation against Campus Speech

On March 8, 2025, Mahmoud Khalil, a lawful permanent resident and former Columbia University graduate student, was arrested by U.S. Immigration and Customs Enforcement at his university-owned apartment. Khalil had been active in organizing pro-Palestinian protests on campus. When detaining Khalil, federal officials cited an obscure provision of the Immigration and Nationality Act to justify his arrest. Federal officials claimed his public activism posed a threat to U.S. Foreign Policy interests.¹⁷ Civil liberties organizations such as the ACLU and NYCLU, immigration attorneys, and the federal judge overseeing the case, argued the real reason for his arrest was retaliation for exercising his First Amendment rights.

In June 2025, U.S. District Judge Michael Farbiarz ordered Khalil's release, stating that the government's claims lacked legal merit and provided no evidence of him being a flight risk or a national security threat. Judge Farbiarz added that punishing someone over a civil immigration matter was unconstitutional.¹⁸

The arrest and detention of Mahmoud Khalil represents a dangerous escalation in government efforts to suppress student activism. As the ACLU noted, this action was not only "unprecedented" and "un-American," but intended to send a message: that public dissent, especially in support of Palestinian rights, may cause personal consequences.¹⁹ Secretary of State Marco Rubio's statement, "We will be revoking the visas and/or green cards of Hamas supporters in America so they can be deported," combines political advocacy with terrorists, further highlighting how national security is being used to justify the suppression of protected

expression.²⁰ This approach not only threatens the individual rights of immigrant and international students, but it also produces a chilling effect across campuses nationwide. When students witness that a peaceful protest can result in arrest or deportation, they are less likely to exercise their First Amendment rights. Thus, Khalil's case reveals the extent to which federal power can be used to intimidate voices and silence speech in academic spaces that are supposed to uphold the First Amendment.

Together, these cases represent critical moments in students' right to free speech on campus, each setting a precedent for how public universities must balance institutional order with the individual rights of their students. However, there are limitations to viewing free speech on campus solely through legal litigation. Legal cases come forth only when serious conflicts reach the courts, often involving high-profile cases rather than the day-to-day experiences of most students. Another significant gap is that these rulings primarily apply to public institutions, as the First Amendment constrains government action. This overlooks a substantial number of private colleges and universities. This gap allows institutions to have policies that enforce stricter speech codes without facing a standard level of scrutiny. These policies provide little information regarding the freedom of speech for their students.

Moreover, legal cases are not able to capture the subtle ways in which free speech may be discouraged on campus. At private universities and colleges, administrative norms, peers, or vaguely worded free speech policies can all contribute to self-censorship. These more concealed forms of restriction are unlikely to become legal cases, but still significantly structure how students participate in free speech.

To better understand these subtler aspects of campus speech, further research can begin by closely examining how institutions regulate expression. It began with a textual analysis of

student handbooks. The wording in these policies revealed whether certain institutions promoted open dialogue, established clear boundaries for expression, or omitted free speech policies in textual analysis. Studying these texts provided valuable insight into private institutions, beyond what legal cases offer, providing a broader perspective on freedom of speech across campuses. Further research is encouraged to understand how these policies are implemented on campus. Whether they are enforced consistently, interpreted on campus, or selectively applied. Both the textual and implementation analyses will provide a more accurate view of how freedom of speech is practiced on a broader range of college campuses.

Research Methods: Word Cloud Analysis of Free Speech Codes

The first step was to create word clouds to visually represent the most frequently used language in student handbooks pertaining to free speech policies. This method helps identify which concepts and terms each university emphasizes in its formal documentation.

The analysis included a total of twenty-eight student handbooks from private colleges and universities in Georgia. These twenty-eight were selected from a list provided by The National Center for Education Statistics, part of the Institute of Education Sciences at the US Department of Education.²¹ They maintain a website listing all US colleges. Filtering for all four-year private universities in Georgia yielded forty-four schools. The forty-four were divided among the authors with a goal of coding at least twenty-five handbooks. The final dataset includes a total of twenty-eight handbooks from that list of forty-four. All schools that required a login to view the handbook or that did not have any language related to free speech, were excluded from the analysis. There were no distinctions made based on region, cost, or reputation, or any other subjective criteria; the ultimate goal is to code all handbooks for universities in the state of Georgia.

Language explicitly related to free speech, expression, protest, and student conduct was extracted from each handbook, this text was then processed through a word cloud generator, which displays the most common terms in larger fonts based on frequency of use. Each word cloud appears as a figure and is accompanied by a description. The results were also compared to third-party assessments such as those from the Foundation for Individual Rights and Education (FIRE) for all schools in both datasets.

Importantly, this study analyzes the official language presented in publicly available handbooks, not the actual implementation or enforcement of free speech policies. Political Science literature has long acknowledged the gap between written policy and administrative practice. The goal is to examine what schools officially claim about student speech rights so they may be held accountable to their own standards. In future research, assessing how these policies are applied in practice would be useful.

Comparative Findings:

The first comparison conducted was a simple word count of speech-related language, ranking institutions from the most to the least expansive in terms of content. Reinhardt University, for instance, emphasizes collective forms of speech such as protest, assembly, and expressive activity. Its policies suggest a strong focus on supporting both individual and community expression. Notably absent are terms associated with disciplinary action or restriction of speech. This indicates that Reinhardt's handbook de-emphasizes punishment in favor of expression. Reinhardt University also appears to be one of the only private institutions in Georgia with a dedicated section on counter-protest. The handbook explicitly protects a student's right to respond to speech with contrary or opposing expressions.

This reflects a broader institutional commitment to protecting speech and counter-speech for their students.

Spelman College supports peaceful protest and free expression while setting clear expectations for respectful conduct both in person and online. The code of conduct applies to digital platforms, especially when posts threaten others or disrupt campus life. The college encourages peaceful assembly, such as protests, marches, sit-ins, and vigils. The institution's policy emphasizes that such activities must not obstruct movement, harm others, or disrupt operations. Students must coordinate events with the Office of Student Affairs and Public Safety. Online expression in the policy is treated as public; students are urged to consider the impact of their digital presence on future opportunities. In all, Spelman College frames expression as a right accompanied by responsibility, aiming to encourage both safety and open dialogue.

Toccoa Falls College analysis supports freedom of expression, but always within the bounds of Christian values. The Student Handbook outlines how music, dance, speech, and assembly are encouraged when they reflect godly character and do not disrupt campus life. Expressions that are sexual, disrespectful, or disruptive to the college's educational mission are prohibited. Public assemblies are allowed but must be peaceful, respectful, and approved in advance in collaboration with Student Affairs. Students are expected to communicate with integrity and to avoid slander, gossip, or vulgar language in the policy. Words that appear most frequently, such as "expression," "disruptive," and "respect," highlight the college's emphasis on spiritual discipline and orderly conduct. These repeated terms reflect how the institution balances student freedom with its religious identity, setting clear expectations for maintaining a Christ-centered community.

Clark Atlanta University presents itself as supportive of student free speech and expression. The university supports students' rights to share their opinions, thoughts, or perspectives, but they must follow appropriate campus protocols. Students are encouraged to exercise freedom of speech in line with the U.S. Constitution's First Amendment, but any expression involving the university's name, imagery, or intellectual property that violates its core values or cultural creed can result in disciplinary action. The university also upholds the right to peaceful assembly, defining it as any gathering conducted peacefully in accordance with university policies. Any group planning a peaceful assembly must identify themselves and state their purpose in advance through the Office of Student Services and Campus Life. They may reserve areas for the event. Furthermore, the distribution of noncommercial materials like pamphlets is restricted on campus. Student publications, like *The Panther*, have the right and responsibility to report student news, editorialize on issues, and provide a platform for student expression, all under faculty advisement and without administrative censorship.

The context for Agnes Scott University emphasizes freedom of expression across multiple areas of student life. The Board of Trustees and administrative officials are responsible for preserving freedom of expression, including supporting guest speakers and ensuring the student press remains free from censorship. The Statement on Academic Freedom and Responsibility and the Statement of Academic Rights and Responsibilities affirm the protection of free speech, especially in classroom discussions, while ensuring that speech and behavior are balanced with appropriate classroom conduct. Social media guidelines respect students' freedom of expression while encouraging responsible and respectful use. The college's posting policy supports freedom of speech for all community members in campus activities. Lastly, the

university emphasizes that behaviors like bullying or cyberbullying, which harm others, are not protected under free speech.

Oglethorpe University emphasizes the importance of freedom of expression and academic freedom for both faculty and students. The student handbook upholds students' rights to freedom of expression and peaceful assembly while also stressing their responsibility to maintain high standards of conduct and respect for others. The policy on student demonstrations supports peaceful protest but outlines conduct standards to prevent disruption. The handbook requires organizers to meet with campus safety in advance. These policies ensure that freedom of speech and academic freedom are protected without limitation.

Distinctly, Wesleyan College recognizes freedom of expression as an essential role for both American democracy and the academic community in its policies. The policy encourages the free exchange of ideas, allowing community members to speak, write, listen, and learn. However, it places limitations on expression only when necessary to maintain the functioning of the college, such as preventing the defacing of property, physical intimidation, harassment, or disruption of campus activities. The college also reserves the right to regulate the time, place, and manner of expression to avoid disruption. Official student publications are given the freedom to operate as means for free inquiry but must adhere to responsible journalism standards. This standard must avoid libel, indecency, and harassment. Publications must also clarify that the opinions expressed do not necessarily represent the views of the college or its student body. Brewton-Parker College upholds freedom of expression but also emphasizes the need to respect the rights of others within the college community. College students are expected to balance their individual needs with those of the community. The college also has specific expectations regarding student dress code in alignment with Christian values and ethics. Students are required

to adhere to standards for attire in areas such as the dining area, classrooms, offices, and the Chapel. Dress code violations, including wearing inappropriate clothing, unkempt attire, or items that contradict the college's code of conduct, may lead to disciplinary actions.

Andrew College supports free speech and the open exchange of ideas, with the understanding that the community must also allow others to express their views. The college supports freedom of expression, ensuring community members can debate and discuss differing viewpoints. However, this freedom is protected from obstruction by others, and the college holds responsibility for providing this freedom, which is not restricted. Additionally, the college addresses gender-based harassment and considers the overall environment in determining whether it is hostile, taking into account the balance between academic freedom and protected speech.

At Emmanuel University, students have the right to freedom of speech and assembly, as long as these actions are conducted with respect for others and their property. The university values constructive protest and discussion, as long as it is respectful. Students who wish to hold demonstrations such as marches or picketing must register with the Student Senate and the Vice President for Student Life at least forty-eight hours in advance. Organizers and participants are responsible for their conduct, and protests must not disrupt the university's normal operations. The university also reserves the right to change the location or disperse protests if necessary.

Paine College recognizes students' rights to freedom of speech, assembly, and association, as guaranteed by the Constitution. Students' publications are not subject to censorship, ensuring that students can express their ideas freely. In addition to the policy, the handbook included a dress code designed to guide students in choosing suitable attire. While it

allows for personal expression, the dress code encourages professionalism and good taste, supporting the college's goal of preparing students for the workplace.

LaGrange College encourages the exchange of diverse ideas and respects academic freedom but acknowledges certain limits on speech, dissent, and protest. These limitations align with the college's civility, diversity, service, and excellence values. Assemblies and protests must not disrupt the college's operations, infringe on others' rights, damage property, or harass others. Additionally, events or promotional materials must receive approval from the appropriate campus official with sufficient notice. The college also emphasizes responsible use of social media, urging students to exercise their freedom of speech while being mindful of their responsibilities.

Berry College values both freedom of expression and the protection of its community members from harassment. While freedom of expression is important, it does not permit actions meant to intimidate, ridicule, or humiliate others. The college strives to balance free speech with the well-being of its community, setting high standards for maintaining a healthy environment. Academic freedom is upheld, and the privacy of those working or studying is respected. Furthermore, students are expected to respect the free speech and participation of others, with any interference potentially jeopardizing their personal and academic integrity.

Reformed University values the rights of its students, faculty, and staff, including privacy, freedom from harassment, and freedom of expression. Professors are encouraged to create a space where open discussion, inquiry, and expression in the classroom occur within a framework of responsibility. While students are free to express differing opinions, they are expected to respect the course's content and engage with it critically. Any behavior that threatens

the health or safety of others will be reviewed, taking into account both freedom of expression and academic freedom.

At Shorter University, professors are expected to promote free discussion and expression while evaluating students based solely on academic performance. Students are responsible for meeting the academic standards set by the university. Their opinions or personal conduct unrelated to academics should not influence their grades. The university prohibits improper academic evaluations or the disclosure of students' personal views, beliefs, or political affiliations. Students must behave in a manner that does not disrupt the learning environment. Life University encourages students to express themselves and engage in scholarly inquiry; they are expected to do so responsibly. The university also allows peaceful and orderly protests, but any actions that disrupt university operations are considered violations of the Honor Code. Life University encourages students to develop a professional demeanor in their policy, including adhering to a dress code that balances individuality with professionalism. The dress code requires students to wear shoes and shirts at all times and maintain modest attire.

Covenant College supports students' right to protest and express dissent, as long as it is done respectfully and does not disrupt academic work or infringe on others' rights. Student demonstrations, including marches, picketing, and vigils, must be registered with the Student Senate and the Office of Student Development at least forty-eight hours before the event. The college holds organizers and participants accountable for their conduct, and protests must not interfere with the normal operations of the college. Demonstrations are only permitted for those affiliated with Covenant College.

Young Harris College supports freedom of expression in personal spaces like dorm rooms but limits outward-facing displays to school-related items such as YHC flags, spirit

paraphernalia, and Greek letters. While students may express themselves through posted literature, they are expected to consider the impact of their words. Advertising that contains profanity, prejudicial content, promotes substance use or illegal acts, incites violence, or discriminates is strictly prohibited.

Morris Brown College upholds students' rights to free expression and open inquiry in academic settings, encouraging professors to create such environments during instruction and advisement. Students are to be graded based on academic performance, not personal beliefs or unrelated conduct. The college also values freedom of association, allowing students to form and join groups that reflect their interests and support their development within the academic community.

DeVry University prohibits participation in demonstrations that disrupt campus operations or interfere with the rights and movements of others. While DeVry maintains a hands-off approach to social media by not censoring criticism, it reserves the right to remove any content it deems inappropriate, including posts that involve disruptive or obstructive behavior. Morehouse College strongly supports students' rights to peaceful assembly and free expression, emphasizing the importance of vigorous discussion and debate within its academic community. At the same time, it upholds the principles of free inquiry and does not allow Title IX to hinder freedom of expression or teaching methods. The policy draws a clear line at sexual harassment, which is not considered protected speech and undermines the college's integrity and academic freedom.

Brenau University values the right to free expression, including the ability to dissent or protest, but it requires that such actions not interfere with the university's mission. Expressions

must not block access to buildings, prevent community members from fulfilling their roles, or disrupt the educational goals for which individuals are employed or enrolled at the university. South University encourages a classroom environment that values diverse perspectives and open discussion and treats all students equitably. Respectful communication is essential at South University. Any use of inappropriate language is subject to disciplinary action, including potential removal from the online platform. All classroom conduct must align with the standards outlined in the Student Handbook.

Thomas University affirms students' rights to freely seek knowledge, discuss ideas, and express opinions both publicly and privately. Provided these actions do not infringe on others' rights or break the law. The university also commits to maintaining residence life spaces that strongly support freedom of expression while promoting civility.

Beulah Heights University emphasizes modesty and moderation in student dress and conduct, aligning with Christian values. Students are expected to avoid revealing clothing and maintain cleanliness. College personnel are responsible for suggesting corrections when attire does not meet these modesty standards. While this reflects the institution's religious principles, it may limit personal expression by restricting how students choose to present themselves through clothing and individual style.

Mercer University upholds students' rights to free inquiry, expression, and peaceful assembly as long as these actions do not infringe upon others' rights. The university explicitly states that its policies are not intended to limit constitutional rights, including freedom of speech under the First Amendment.

Piedmont University defines academic freedom as essential to its mission, allowing both faculty and students to explore and discuss ideas freely without fear of censorship or discipline. While the school supports individual speech, it places less emphasis on protest speech.

Herzing University supports online self-expression through personal blogs and social media, but since it is an online-only institution, it doesn't provide guidance on public demonstrations or campus-based protests.

The next section examines figures from several private universities in Georgia to compare how they approach freedom of expression on campus, highlighting schools with the most restrictive policies, the ones with the most permissive speech, and the median of free speech codes across these campuses. These figures will help us see how freedom of expression is handled across private campuses in Georgia.

Figure 1

Frequency of Free Speech–Associated Code Words in Herzing University Student Handbook



Note. The word cloud illustrates the most frequently used terms in Herzing University's student handbook when describing its freedom of expression policy. Larger words appeared more frequently. Herzing University has the least expansive free speech code among private online colleges in Georgia.

Figure 2

Frequency of Free Speech–Associated Code Words in Piedmont College Student Handbook



Note. The word cloud illustrates the most frequently used terms in Piedmont College's student handbook when describing its freedom of expression policy. Larger words appeared more frequently. Piedmont College has the second least expansive free speech code among private colleges in Georgia.

Frequency of Free Speech–Associated Code Words in Reformed University Student Handbook

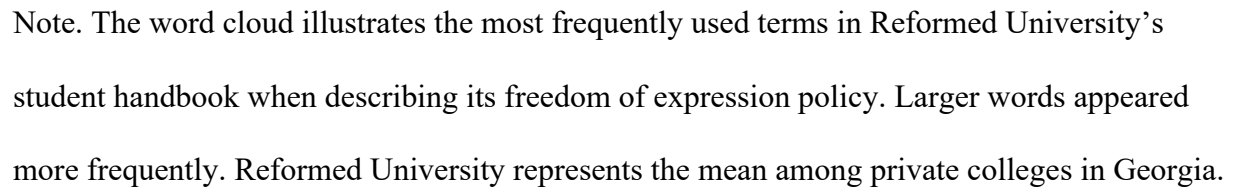


Figure 4

Frequency of Free Speech–Associated Code Words in Reinhardt University's Student Handbook



Note. The word cloud illustrates the most frequently used terms in Reinhardt University's student handbook when describing its policy on freedom of expression. Larger words appeared more frequently. Reinhardt University currently maintains the most expansive free speech code among Private Georgia colleges.

Conclusion

This study began with a simple question: what types of speech do colleges and universities *say* they will protect, and what types of speech do they say they will not protect? The answer to this question was probed through a content analysis of student handbooks for twenty-eight private higher education institutions in the state of Georgia, or all private institutions that have Handbooks available online without going through a security wall, and are listed on the College Navigator website maintained by the US Department of Education, as described above.

Private institutions were chosen in part, because, while they do not have to protect the free speech of their students, by virtue of their private status, many of them still do. It was also expected that because of that distinction, there may be more varied and interesting results. However, the goal of this project is to code the handbooks for all universities in Georgia both public and private.

All twenty-eight of the schools examined claimed to protect some free speech. A Word Cloud editor was used to generate some detailed insights on free speech at specific schools, including those ranging from the most expansive to least expansive. As with the Foundation for Individual Rights in Education's (FIRE) Spotlight on Speech Codes, the analysis revealed that not all policies offer extensive statements on free speech nor do they offer equal free speech protections to students. Some universities emphasize the importance of free speech and expression for both the individual and the community, while forsaking terms related to disciplinary actions and restrictions on free speech. However, private faith-based universities often limit students' ability to express themselves and free speech. This is evident in Young Harris College's policies on free speech counter the Supreme Court's verdict in *Papish v. Board of Curators of the University of Missouri* by restricting speech or expression based on offensive content. By understanding universities' free speech policies, universities can be held responsible for their policies while student's First Amendment rights are protected, creating a more inclusive environment for students on college campuses.

The paper then offered some suggestions for future research. The hope is to extend this content analysis to public universities in the state of Georgia so that the database that will allow comparisons between what speech public versus private universities protect. It would then be

possible to extend the content analysis so that we can make such types of comparisons for institutions in other states.

ENDNOTES

¹ The Foundation for Individual Rights in Education (FIRE), *College Free Speech Rankings 2020* (Philadelphia: FIRE, 2020).

² *Ibid.*

³ *Ibid.*

⁴ *Ibid.*

⁵ *Ibid.*

⁶ *Healy v. James*, 319 F. Supp. 113 (D. Conn. 1970).

⁷ *Ibid.*

⁸ *Papish v. Board of Curators of the University of Missouri*, 410 U.S. 667 (1973).

⁹ *Widmar v. Vincent*, 454 U.S. 263 (1981).

¹⁰ *Ibid.*

¹¹ *Hosty v. Carter*, 412 F.3d 731 (7th Cir. 2005).

¹² *Rosenberger v. Rector and Visitors of the University of Virginia*, 515 U.S. 819 (1995).

¹³ *Iota Xi Chapter of Sigma Chi Fraternity v. George Mason University*, 773 F. Supp. 792 (E.D. Va. 1991).

¹⁴ *Uzuegbunam v. Preczewski*, 592 U.S. (2021).

¹⁵ *Speech First, Inc. v. Schlissel*, 939 F.3d 756 (6th Cir. 2019).

¹⁶ *Young Americans for Liberty at the University of Alabama in Huntsville v. St. John IV*, No. 1210209 (Ala. 2022).

¹⁷ Reuters, “U.S. Judge Orders Release of Pro-Palestinian Activist Khalil,” *Reuters*, June 20, 2025, <https://www.reuters.com/legal/government/us-judge-orders-release-pro-palestinian-activist-khalil-2025-06-20/>.

¹⁸ *Ibid.*

¹⁹ American Civil Liberties Union, “ACLU Strongly Condemns Unlawful Arrest and Detention of Columbia Student Activist,” April 2025, <https://www.aclu.org/press-releases/aclu-strongly-condemns-unlawful-arrest-and-detention-of-columbia-student-activist>.

²⁰ *Ibid.*

²¹ <https://nces.ed.gov/collegenavigator/?s=GA&ct=2+3&ic=1>