



# The California Three Rs Project

*Rights, Responsibility, and Respect*

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## BULLETIN

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## Why Is Mindfulness an Issue for Public Schools?

**Damon Huss**

Director, California Three Rs Project

It is not surprising in today's culture that many students suffer from stresses that sometimes interfere with their ability to learn and perform well in school. Good teachers have always used quieting moments to focus students on learning and thinking, and to this end some public schools have begun to address the need for a learning environment free from interruptions and distractions through focusing or quieting exercises called "mindfulness" or "mindful awareness practices" (MAPs) for students. School-led mindfulness practices typically involve a short period of quiet time with guided or unguided silent breathing at the beginning of the school day, and some schools promote mindful breathing as a practice students—and even parents—can use at home.

What is mindfulness? Beginning in the 1970s, psychologists and psychiatrists began applying meditation practices originally associated with both Zen and Theravada Buddhism as "mindfulness" into their own therapeutic work with patients and clinical research subjects. Jon Kabat-Zinn, a molecular biology Ph.D. teaching at the University of Massachusetts Medical School, pioneered the use of mindfulness for stress reduction in 1979, defining mindfulness in non-religious language as "awareness that arises through paying attention, on purpose, in the present moment, nonjudgmentally." It has since been used in hospitals and psychotherapeutic settings to help people dealing with stress. It is the emphasis on stress-reduction that has made mindfulness or MAPs programs palatable to public schools.

Controversy has arisen in some school communities when parents argue that mindfulness programs are religious in nature, namely Buddhist. These parents object to their children participating in what they see as a religious practice, which would violate the First Amendment's prohibition on school-sponsored religious activity. Specifically, in 1962, the Supreme Court decided in *Engel v. Vitale* that school-sponsored prayers are unconstitutional practices. The court held that a New York school district's "program of daily class-

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*It is the content that determines the religious or secular nature of any given practice, not necessarily the practice itself.*

room invocation of God's blessings as prescribed" by the state "is a religious activity." The problem for the state, in this case, was that the "nature of such a prayer has always been religious . . . ."

The question remains if mindfulness, too, "has always been religious." In this expanded double issue of the California Three Rs Project *Bulletin*, we present two different views on the

question of whether mindfulness practices are inherently religious activities, and whether they should be prohibited as such in public schools. In this issue, Dr. Patricia Jennings, associate professor of education at the University of Virginia, presents the argument that mindfulness practices are secular, provided that teachers and administrators present them as secular and with-

out "spiritual" language or rituals. Also in this issue, Dr. Candy Gunther Brown, professor of religious studies at Indiana University, presents the counterargument.

Dr. Jennings and her publisher have graciously allowed us to republish her article "Mindfulness-Based Programs and the American Public School System: Recommendations for Best Practices to Ensure Secularity."

## **Mindfulness-Based Programs and the American Public School System: Recommendations for Best Practices to Ensure Secularity**

**Dr. Patricia Jennings, University of Virginia**

Over the past decade, the interest in mindfulness among educators and the number of mindfulness-based programs for students and teachers has grown dramatically. Empirical research to examine the effectiveness of such programs has increased exponentially, but it has not kept up with the burgeoning growth of school-based programming. While the research is indeed promising, there is still much to learn about how best to introduce mindful awareness practices (MAPs) to children and adolescents in school settings. A primary concern is whether or not MAPs constitute religious activities that cross the boundary between church and state, especially as delin-

eated by the first amendment to the U.S. Constitution (e.g., *Sedlock v. Baird*, 2015). The purpose of this commentary is to address this question and to offer recommendations for best practices in public educational settings.

Religion has been defined as: "a set of beliefs concerning the cause, nature, and purpose of the universe, especially when considered as the creation of a superhuman agency or agencies, usually involving devotional and ritual observances, and often containing a moral code governing the conduct of human affairs." The term *secular*, by definition, means not pertaining to or connect-

ed with religion. While law dictates that public schools in the United States not teach religious content, Western educational systems originated in religious contexts, and there are practices in use in our educational settings derived from religious practices. For example, choral reading of prayer is a common practice in religious settings. Choral reading is also used in educational settings; however, the content is secular (e.g., poetry, dramatic reading). Therefore, it is the content that determines the religious or secular nature of any given practice, not necessarily the practice itself. While

MAPs can be found within both Eastern and Western religious traditions, the practice of mindfulness itself is not inherently religious.

Secular MAPs do not involve and/or require any belief. Rather, the rationale for such practices in educational settings is based in evidence from cognitive and affective neuroscience and the social and behavioral sciences (MLERN, 2012). Research directed towards the reduction in suffering and the promotion of human flourishing has demonstrated the value of MAPs in numerous contexts (Keng, Smoski & Robins, 2011). This evidence is critical to the successful application of mindfulness to a variety of secular settings. Individuals adapting MAPs for public educational settings should be familiar with and draw upon this research to design MAPs that are based in this evidence, align with educational aims and objectives, and meet the needs of the school context.

Content such as language, artifacts, or beliefs that are associated with practices in religious contexts should not be introduced in public educational settings. When it comes to language and artifacts, the distinctions between the religious and secular may be subtle; however, it is best to error on the side of secularity to avoid misunderstandings. For example, the practice of focusing attention on the sound of a bell or chime

is a MAP commonly introduced to younger children. Using a bell from a religious tradition (such as a Tibetan bowl or cymbals used in Tibetan Buddhist rituals) may give the impression that the practice has religious significance, when the intention is purely secular. Therefore, it is recommended that educators use bells and/or chimes that are devoid of these associations.

Similarly, introducing names, words or sounds that come from a religious or spiritual tradition (that are associated with spiritual and/or religious belief) as a focus of attention during practice is inappropriate in the secular public school context. Furthermore, when introducing postures from yoga, the use of *Sanskrit* names and identifying areas of the body associated with spiritual and religious significance (e.g., *chakras*) is inappropriate. This does not preclude educators from focusing on areas of the body such as the center of the chest or the center of gravity of the body. Indeed, focusing attention on the chest may be helpful when engaging in practices intended to generate care and/or compassion, and focusing attention on the center of gravity of the body located in the lower part of the abdomen may help children and adolescents learn balance and stability. While each of these areas of the body may have spiritual and/or religious significance in yogic and/or other spiritual and religious traditions, teaching these associations in public schools is inappropriate and unnecessary for engaging in the practices and deriving benefit from them.

Finally, it is recommended that instructors take care not to give the impression that MAPs involve the transmission of any sort of spiritual or metaphysical energy. For example, a common practice that has been adapted for use in school settings is “lovingkindness practice,” intended to promote feelings of care and compassion for oneself and others (Flook, Goldberg, Pinger & Davidson, 2015; Kang, Gray & Dovidio, 2015). This practice typically involves focusing attention sequentially on oneself and a series of others who are felt as more or less intimate and generating and extending feelings of goodwill in the form of mentally repeated phrases such as “may you be well, peaceful and happy.” It is important to clarify that the intention of this practice is not to actually transmit anything to another, but to simply generate positive and caring feelings within oneself for oneself and others.

To be clear, the suggestion is not that one should conceal the fact that such associations between practices and religious and spiritual traditions exist. Rather, it is that educators be especially careful to ensure that the nature of the practices they are introducing is indeed completely secular and science based, and to explain clearly that the rationale for such practices is based in science, rather than belief. Furthermore, I am not suggesting that MAPs be presented as devoid of an ethical base. I agree with Greenberg and Mitra’s (2015) exposition of the value of “right mindfulness,” or mindfulness informed

by secular ethics. Educators can link practices to the secular ethical framework found in educational settings (e.g., The Golden Rule). For example, students learn MAPs that help them manage their anger, which improves their behavior and their relationships with their teacher and peers.

A final consideration is how MAPs are integrated into the school day. In many cases, these activities have been added on to the regular school schedule and introduced by individuals from outside the school community who may not understand the importance of secularity and/or how to present secular MAPs. Educators faced with growing demands to cover academic content may perceive mindfulness-based programming as intrusive and burdensome, and parents may wonder why valuable school time is being used for such programming. Depending upon outside providers who may have a limited understanding of education and child development to deliver such programming may be inadvisable and unsustainable. However, educators presenting MAPs to students without adequate preparation may also be problematic. An educator's misapprehension of the secular ethical basis for MAPs may lead to a misappropriation of these practices aimed towards student compliance and raising test scores, rather than promoting individual and community flourishing.

Two promising trends are the proliferation of mindfulness-based professional development programs for teachers (Roeser, Skinner, Beers, & Jennings, 2012) and the movement to integrate MAPs into curricular areas such as social and emotional learning and health and physical education (Broderick, 2013; Compassionate Schools Project, 2015; Felver, Doerner, Jones, Kaye & Merrell, 2013; Gueldner & Feuerborn, 2016; Jennings, Lantieri, & Roeser, 2012). MAPs specifically developed for teachers may not only reduce teacher stress (Harris, Jennings, Katz, Abenavoli, & Greenberg, 2015; Jennings, Snowberg, Coccia, & Greenberg, 2011; Jennings, Frank, Snowberg, Coccia, & Greenberg, 2013; Roeser et al., 2013; Schussler, Jennings, Sharp, & Frank, 2015; Taylor et al. 2015) and improve performance (Jennings et al. 2015a), but also prepare them with the skills required to present MAPs to students effectively (Jennings, 2015b; Schonert-Reichl et al. 2015). MAPs may help build the underlying capacities required to develop the social and emotional competencies as outlined by the Collaborative for Academic, Social and Emotional Learning (CASEL, n.d.). Furthermore, MAPs align well with the recently released CDC/ASCD Whole School, Whole Community, Whole Child approach to health and physical education (Lewallen, Hunt, Potts-Datema, Zaza & Giles, 2015) and integrating MAPs may bring new interest and energy to this curricular area as well.

It is critical to the success of the mindfulness in education movement that MAPs delivered in pub-

lic educational settings conscientiously avoid any elements that are associated with religious and/or spiritual language, trappings and belief. As the field grows and develops, educators are finding ways to ensure that MAPs are completely secular, based in the most current evidence and introduced in ways that fit the needs and the context of educational settings.

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### **The December Dilemma: Religious Holidays in the Public Schools**

by Dr. Margaret Hill

Winter holidays can be a challenge for public schools. Before planning holiday concerts or other activities in a public school, please read "The December Dilemma: Religious Holidays in Public Schools" by Margaret Hill for the California Three Rs Project (Rights, Responsibility, Respect), updated for 2016. It includes a factsheet on winter holidays, an extensive list of classroom resources, important dates of a variety of religious holidays, and a children's literature list.

**Download:**

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## Are “Secular” Mindfulness-Based Programs in Public Schools Religion-Neutral?

Dr. Candy Gunther Brown, Indiana University

*It is problematic to assume a rigid distinction between beliefs and practices or to infer that practices are – “inherently,” or by nature – religion-neutral.*

Patricia Jennings’s “Recommendations for Best Practices to Ensure Secularity” is perhaps the clearest, most thoughtful effort to navigate the challenges of teaching mindfulness in public schools that has been written by a movement insider. Most discussions of public-school mindfulness acknowledge in passing the Buddhist roots of mindfulness, but in the next breath assert that mindfulness has been “secularized”—without defining “religion,” “secularity,” or explaining what has been changed or removed to convert mindfulness from a religious into a secular practice.

To her credit, Jennings begins her essay by defining religion and secularity. Less fortunately, Jennings relies on Dictionary.com for her definitions of religion as a “set of beliefs” and secular as “not pertaining to or connected with religion.” (See original version of Jennings’s article, published in *Mindfulness* 7 (2016): 176, where she cites Dictionary.com as the source for her definitions.) Since “secular MAPS [mindful awareness practices] do not involve and/or require any belief,” they are by Jennings’s definitions secular. Centering her definitions on beliefs allows Jennings to distinguish between “practices” that originated in religious contexts and the verbal, belief-laden “content” of those practices.

By this logic, practices such as mindfulness are not “inherently” religious – the linguistic content or, to again quote Jennings, the “trappings” attached to the presumably religion-neutral practices is determinative.

It is problematic to assume a rigid distinction between beliefs and practices or to infer that practices are – “inherently,” or by nature – religion-neutral. Many scholars who have devoted their careers to the study of religion understand it to encompass not only beliefs, but also practices perceived as connecting individuals or communities with transcendent realities, aspiring toward salvation from ultimate problems, or cultivating spiritual awareness and moral or ethical virtues. (See, for example, Durkheim 176; Smith 179-196; Tweed 73.) Removing overt linguistic or visual markers of transcendent beliefs may not be enough to secularize a practice if, for instance, communities envision that practice as means for cultivating direct, experiential knowledge of transcendent realities. Although Jennings analogizes mindfulness to choral reading, a closer parallel may be the Catholic sign of the cross – it can be practiced devoid of verbal content or could even be reframed as a physical exercise for limbering the hand and arm

before writing, but is still richly laden with religious symbolism and envisioned by practice communities as transforming spiritual realities (Ghezzi, 2006).

The practice of “mindfulness” is also, in contemporary American culture, meaning-rich. Jon Kabat-Zinn, the developer of Mindfulness-Based Stress Reduction (MBSR), privileges the term “mindfulness” precisely because it does “double-duty.” It simultaneously seems to denote a universal human capacity and also functions as “placeholder for the entire dharma,” an “umbrella term” that “subsumes all of the other elements of the Eightfold Noble Path,” thereby evoking a “comprehensive” Buddhist worldview and way of life—*Buddhadharma* (Kabat-Zinn “Some Reflections” 281-306; Kabat-Zinn “Foreword” xxviii-xxiv, xxviii-xxix; Stratton 100-118, 103; Winston 46-55, 48). Indeed, when addressing Buddhist audiences, Kabat-Zinn describes mindfulness-based programs as “secular Dharma-based portals” opening to those who would be deterred by a “more traditional Buddhist framework or vocabulary” (Williams and Kabat-Zinn 1-18, 12, 14). Insider documents detail how the MBSR class sequence provides a “full expression” of “the essence of the dhamma,” including the “4 noble truths [suffering, its cause, its cessation, the

path], 4 foundations of mindfulness [body, feelings, mind, Dharmas], and 3 marks of existence [suffering, impermanence, no self]” (Stahl, 2015). MBSR “techniques” are “merely launching platforms or particular kinds of scaffolding to invite cultivation and sustaining of attention in particular ways” that bring about “direct experience of the noumenous, the sacred, the Tao, God, the divine, Nature, silence, in all aspects of life” (Kabat-Zinn “Mindfulness-Based Interventions” 144-156, 147-148; “Catalyzing Movement,” 1994). Beginning with “awareness of the breath” and proceeding from there to “systematic widening of the field of awareness” promotes “insights into no-self, impermanence and the reality of suffering,” dispels “greed, hatred, and delusion,” and leads “automatically” to “enlightenment” (Cullen “Mindfulness-Based Interventions” 186-193, 188, 192).

Secular mindfulness leaders such as Kabat-Zinn envision the practice of mindfulness as being inherently transformative. Thus, they are relatively unconcerned that getting mindfulness into public venues such as schools requires stripping inessential religious language – since it is presumably the practice itself, not the linguistic framing or “trappings,” that transforms. Certain secular mindfulness promoters actually describe their tactics—when speaking to insiders—as “skillful means,” “stealth Buddhism,” a “Trojan horse,” or a “script” to “disguise” Buddhist meditation as a neuroscience-validated, religion-neutral practice (Kabat-Zinn “Some Reflections” 281; Goodman “Stealth Buddhism,” 2014; Folk “The

Trojan Horse of Meditation,” 2013; Hawn, Address for Heart-Mind 2013, 2013; Goleman 7).

Just as religion embraces more than beliefs, “secular” evokes a more complex range of meanings than the mere absence of religion. The term originated in Roman Catholic Canon Law to differentiate a priest who lived in the world (*saeculum*) from a priest who lived in a religious cloister. Thus, there could be secular priests—who were arguably more effective than cloistered priests in exerting religious influences in the world (Casanova 13-14). In today’s usage, secular refers not only to the absence of religion, but also to control over religion, equal treatment of its various forms, or the replacement of religious with this-worldly social values (Calhoun 5). Despite the tendency of many people to think of religion and secularity as opposites—and to assume that a practice can be one or the other but not both—in point of fact, the religious and the secular often intermingle (Asad, 2003; Taylor, 2007; Jakobsen and Pellegrini, 2008). Jennings similarly confuses scientific validation with secularity. Yet, many religious and spiritual practices produce clinically documented physical and mental health benefits (Koenig, King, and Carson, 2012; Aldwin, Park, Jeong, and Nath 9-21).

Jennings should be commended for acknowledging that public-school mindfulness programs have not always succeeded in excluding religious “language, artifacts, or beliefs.” She cites as examples the common classroom practices of focusing attention on the sound of a “bell from a religious tradition (such as a Tibetan bowl or cymbals used in Tibetan Buddhist rituals)” or on “names, words or sounds” that are “associated with spiritual and/or religious belief”; using Sanskrit names for yoga postures; identifying parts of the body

with the metaphysical concept of *chakras*; implying that repetition of a “lovingkindness” blessing such as “may you be well, peaceful and happy” transmits “spiritual or metaphysical energy”; or employing Buddhist mindfulness teachers “from outside the school community who may not understand the importance of secularity.” Removing such blatantly religious elements—all of which, to emphasize, are common in classroom mindfulness instruction—is a good start, but insufficient to “ensure secularity.”

A key problem unaddressed by Jennings is that even after stripping mindfulness classes of overtly religious language or artifacts, instruction in mindfulness practices may nevertheless instill culturally and religiously specific and contested worldviews, epistemologies, and values. As secular mindfulness teacher Jenny Wilks explains in the article “Secular Mindfulness,” “key Dharma teachings and practices are implicit . . . even if not explicit” in secular classes. Wilks elaborates that “although we wouldn’t use the terminology of the three *lakkhanas* [marks of existence: *anicca*, or impermanence; *dukkha*, or suffering; and *anatta*, or no-self] when teaching MBPs [mindfulness-based programs], through the practice people often do come to realize the changing and evanescent nature of their experiences.” Those teaching mindfulness in secular contexts such as public schools may not intend to cross the wall separating government from religion, or even recognize that they are doing so. But suppositions about the nature of reality can become so naturalized and believed so thoroughly that it is easy to infer that they are simply true and universal, rather than recognizing ideas as culturally conditioned and potentially conflicting with other worldviews. Jennings identifies as

a “promising trend” the “proliferation of mindfulness-based professional development programs for teachers.” Yet, she neglects to note that mindfulness programs targeted to public-school teachers often include participation in overtly Buddhist meditation retreats and attendance at “Dharma talks” (Cullen 192). Buddhist mindfulness teacher Lynette Monteiro suggests in “Ethics and Secular Mindfulness Programs” that, “regardless of the intention to not impose extraneous values,” the specifically Buddhist assumptions that provide the rationale for mindfulness practices are “ever-present and exert a subtle influence on actions, speech and thoughts.” Brooke Dodson-Lavelle, Director of the Mind and Life Institute’s Ethics, Education, and Human Development Initiative, acknowledges that secular mindfulness programs are “morally substantive as a consequence of the fact that they tell people, at least implicitly, stories about what they *ought* to be thinking, feeling, or doing.” They are “ethically substantive as a consequence of the fact that they establish or encourage particular ways of conceptualizing the self, the good life, and the potential for transformation of the self towards a better kind of life” (28, 161, 163).

Mindfulness instruction involves not only training in specific techniques, but also instills particular attitudes towards one’s experiences and ways of viewing the world. One of the most widely cited definitions is that popularized by Kabat-Zinn: “paying attention in a particular way: on purpose, in the present moment, and non-judgmentally” (Wherever You

Go, 4). Amy Saltzman, a pioneer in teaching mindfulness to youth through her Still Quiet Place program, defines mindfulness as “paying attention, here and now, with kindness and curiosity” (2). Neither definition reduces mindfulness to bare attentional training. Rather, they indicate a particular ethical stance of *how* one should pay attention—non-judgmentally, with kindness and curiosity—and this ethical stance comes from a Buddhist “way of seeing the world” (Dodson-Lavelle 42). Mindfulness teachers cultivate a “particular attitudinal framework” and “view of the nature of human suffering” (Crane, Kuyken, Hastings, Rothwell, and Williams 74-86, 82). These “foundational attitudes” include “non-judging, patience, a beginner’s mind, non-striving, acceptance or acknowledgement, and letting go or letting be”—concepts that are closely related to the core virtues expounded by early Buddhist texts (Santorelli 10; Stanley 99). Indeed, all the core Buddhist virtues — “the *brahma vihāras*”: lovingkindness, compassion, sympathetic joy, and equanimity — are “seamlessly integrated” into secular mindfulness training. For example, Goldie Hawn’s trademarked *MindUP* curriculum for K-8 classrooms promises that participating three-times daily in the “Core Practice” of “deep belly breathing and attentive listening” will instill “empathy, compassion, patience, and generosity” — virtues derived from though not credited to Buddhist ethics (Hawn Foundation 11-12, 40-43, 57).

Jennings suggests that “right mindfulness” should be informed by “secular ethics.” Yet, *right mindfulness* is a specifically Buddhist ethical concept. It is a translation from Pali of *sammā sati*, used in Buddhist sacred texts such as the *Satipaṭṭhāna Sutta*, or “The Discourse on the Establishing of

Mindfulness,” and it comprises the seventh aspect of the “Eightfold Noble Path” to liberation from suffering, the fourth of the “Four Noble Truths” of Buddhism (Wilson 16). It is the Dalai Lama who popularized the ideal of “secular ethics.” The concept requires accepting as self-evident that all people share fundamental goals and values. Yet, in the teaching experience of Dodson-Lavelle, the notion that “all beings want to be happy and avoid suffering” has “failed to resonate” with many students in secular mindfulness classes (17, 96-99, 162).

Buddhist and Christian assumptions about the nature of reality and the basis of morality and ethics diverge sharply. Buddhists teach that life is suffering, suffering is caused by desires and aversions, and cessation of suffering requires following a path of escape from the cycle of death and rebirth. Christians view life as a good gift from God and anticipate that God will grant individuals the desires of their heart as they hate what is evil and delight themselves in God. Rather than non-judgmental, accepting awareness of the present, Christian teachings encourage rejection of certain thoughts and feelings as wrong; repentance of past sins and grateful remembrance of God’s redemptive work in history; faith in God’s future promise of eternal life and striving to live a holy life. Contrary to waking up to realize that everything is impermanent, there is no self, or that awareness itself is the ultimate reality, Christians affirm that a personal God created each individual as a unique, enduring self for the purpose of eternal relationship with God. For Christians, the source of suffering is sin, or dis-obedience to God, and the only path to end suffering was paved by God’s love for humanity, demonstrated through Jesus’s atoning death and resurrection, and



which can only be appropriated through repentance and faith in Jesus as one's personal Savior. In place of locating the source of compassion in the non-dual realization that everyone is part of the same Buddha nature, Christians adopt a dualist belief that a transcendent God is love and the source of human compassion.

The oft-made claim that values instilled by mindfulness programs are "universal" obscures fundamental disagreements between religious groups. Although many Buddhists and Christians value "compassion" and "lovingkindness," they may define these terms so differently that they aspire toward competing ideals. For example, Christians place a high value on sacrificial love—purportedly demonstrated by Jesus's willingness to sacrifice his life for the sake of fundamentally other "selves." Christians view their own highest calling as to love others—even when doing so means sacrificing one's own needs for those who give nothing in return. To imply that compassion and lovingkindness relieves one's own suffering and promotes one's own happiness because everyone shares the same nature may be perceived as conflicting with central Christian values.

One of the key tests of the constitutionality of a government-endorsed program is that the "principal or primary effect" must be one that neither "advances nor inhibits religion" (*Lemon v. Kurtzman*, 1971). Do secular mindfulness programs exert religious effects? Secular mindfulness teachers often describe their classes as a "doorway" into Buddhism and offer anecdotes of individuals attending Buddhist retreats after being intro-

duced to mindfulness by a secular class (Taylor, 2013; Goodman "Stealth Buddhism," 2014; Blacker 54; Wilks 2014; Batchelor 13, 88-89, 88; Britton, 2011; Kabat-Zinn, "Mindfulness and the Cessation of Suffering," 2010; Cullen 189). Mindfulness researcher Doug Oman notes that the "middle-term and long-term" effects of participating in secular mindfulness seem to include joining Buddhist organizations (36). Survey research confirms that secular meditation often provides a "gateway to subsequent interest in Buddhism" (Lomas et al. 198-207, 201). A survey of secular MBSR participants found that after eight weeks, 54% reported that the course had deepened their "spirituality" (Greeson et al. "Changes in Spirituality" 508-518; Greeson et al. "Decreased Symptoms of Depression" 166-174). Another study found that participant intentions shift over time, and that longer-term meditators are less likely to be religious "Nones" or monotheists and more likely to identify as "Buddhist" or with "All" religions" (Shapiro 23-39). The religious effects of public-school-based mindfulness programs may not be immediately evident, and yet be the *principal*—or "most important, consequential, or influential"—effects produced (Merriam-Webster.com). Pediatrician and mindfulness teacher Dzong Vo explains in his comment on "The Heart of Mindfulness" that in teaching mindfulness to "children and youth, a lot of the benefit is not immediate, obvious, or concrete. So much of it is about planting seeds, and I sometimes see the flowers bloom many months later." School programs prepare youth to be "open and interested in exploring mindfulness more deeply" when given opportunities outside the school context.

The proliferation of public-school mindfulness programs has not been without controversy. Some schools have responded to complaints that mindfulness advances Buddhism by canceling mindfulness programs; others have ignored complaints. There have not been any lawsuits – yet. So far the closest call was in Cape Cod, Massachusetts in 2015, when a parent on the local school board enlisted the help of an attorney to prepare a legal memorandum asking the school district to suspend its "Calmer Choice" mindfulness program. Although the district ignored the request, no lawsuit was filed – but the incident got the attention of the mindfulness-in-schools community. As Calmer Choice's director, Fiona Jensen, reached out for support, one public-school mindfulness leader after another told her, "We've been waiting for this to happen." Jensen organized a retreat for movement leaders to develop a strategy for how to avoid future challenges. The group made a list of common classroom practices that were most likely to "offend," reasoning that "if we don't know where the landmines are, we're going to step on them." Their list of practices to "avoid" because they are unlikely to pass the "litmus test" of religious neutrality includes "lovingkindness" meditations, "Tibetan bowls, namaste hands, mudras, [and] mantras" (Jensen, 2016). The working group did not suggest fundamentally altering mindfulness practices taught, but rather avoiding the most easily recognized markers of religion.

This tactic of landmine-avoidance may be in tension with Jennings's important warning – she is *not* suggesting that "one should conceal the fact that such associations between practices and religious and spiritual traditions exist. Rather, it is that educators be especially careful to ensure that the nature of the

practices they are introducing is indeed completely secular.” The question raised by this response essay is whether Jennings’s recommendations go far enough in ensuring that practices introduced in public schools are completely secular.

It is understandable that public schools are looking for solutions to perceived crises of poor academic performance, stress, obesity, drugs, and violence. But mindfulness is not the only way to address these issues. Aerobic exercise, music, and nutritious food all

produce comparable benefits (Colcombe et al. 1166-1170; Wan & Schlaug 566-577; Gómez-Pinilla 568-578). The challenge for twenty-first-century public schools is how to encourage student flourishing while carefully guarding religious neutrality.

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**The California Three Rs Project** (CA3Rs) is a program for finding common ground on issues related to religious liberty and the First Amendment in public schools. The CA3Rs' approach is based on the principles of American democracy and citizenship, reflected in the First Amendment of the Bill of Rights and applied in a public school setting.

For over two decades, the CA3Rs has provided resources, professional development, and leadership training for teachers and education professionals in order to disseminate essential information about religious liberty, freedom of conscience, and the history of religion in America.

**Common Ground Resources**

Haynes, Charles C., and Oliver Thomas. *Finding Common Ground: A Guide to Religious Liberty in the Public Schools*. Nashville: First Amendment Center, 2007. <<http://www.firstamendmentcenter.org/madison/wp-content/uploads/2011/03/FCGcomplete.pdf>>

Religious Freedom Center at the Newseum. <<http://www.religiousfreedomcenter.org/>>

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## Constitutional Rights Foundation Receives Grant to Support Teacher Leaders, Collaboration, and Implementation of New State Standards

Constitutional Rights Foundation (CRF) has been awarded a new grant from the Center for the Future of Teaching & Learning at WestEd to work with teacher leaders to enhance instructional practices that engage students in critical thinking and improve reading, writing, and discussion skills.

We have great partners: Los Angeles County Office of Education, Carolina K-12 at University of North Carolina-Chapel Hill, and the Florida Joint Center for Citizenship at the Lou Frey Institute housed at University of Central Florida.

CRF and our partners are working with 20 teacher leaders who will be featured in upcoming issues of *Bill of Rights in Action*. We will share tips, lessons, and resources on CRF's and partner websites throughout the year! Look for the **T2T** icon!

**There are two ways to join the T2T Collab:**

- Teachers based in Los Angeles County and San Bernardino County in California, North Carolina, or Florida can join one of our teacher cohorts lead by teacher leaders and receive free face-to-face professional development, online support, and stipends too!
- Not based in one of our partner states? You can still register to receive free online professional development with teacher leaders (webinars, Twitter chats, notifications of new resources, etc.).

For more information and to join a cohort visit: [www.crf-usa.org/t2tcollab](http://www.crf-usa.org/t2tcollab)

This project is part of the Center for Teaching & Learning's Teacher Practice Network and is funded by the Bill & Melinda Gates Foundation.

Free PD &  
Resources



**T2T  
Collab**