



# ProVita

Online Newsletter of the  
University Faculty for Life



**I**n this edition we look forward to next year's conference at Fordham in the Bronx. We also continue our Focus on the Disciplines, with art historian Carolyn J. Watson.

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## UFL Updates

**I**n which we highlight the activities of our organization, members, and chapters, including publications, talks, and consultations.

### UFL

- **2014 Conference.** Plan now for the 2014 UFL Twenty-Fourth Annual Conference "Life and Learning XXIV" to be held June 6-7, 2014 at Fordham University, Bronx NY.

Attendance is open to current or former college, university, and seminary faculty and their spouses, graduate students, and others by individual request.

Proposals for scholarly paper presentations are invited. Papers should focus on the life issues of abortion, infanticide and euthanasia. Themes for the conference include the legal, political, social, economic, and medical

implications of these topics; relevant legal, philosophical and theological issues; the physical and psychological effects of abortion; and insights from history, literature, the arts, humanities and other disciplines.

Paper proposals should be one page (maximum) and should include the working title of the proposed paper, author's name, affiliation, full contact information (including address, phone, fax and email), and a brief abstract or outline. The deadline for receipt of proposals is April 7, 2014. All papers presented at the conference may be submitted after the conference for possible publication in Life and Learning, an annual peer-reviewed selection of conference papers.

To propose a paper, send the proposal (preferably by email attachment) by April 4, 2014 to:

Professor Barbara Freres  
Department of Philosophy  
Cardinal Stritch University  
6801 N. Yates Road  
Milwaukee WI 53217  
tel: 414-410-4844  
[bjfreres@stritch.edu](mailto:bjfreres@stritch.edu)

- **Scholarly Achievement Award.** University Faculty for Life is accepting submissions from college or university students for its Scholarly Achievement Award. The contest is open to undergraduate and graduate students at any higher education institution (community college, medical school, seminary, university, etc.); postsecondary students enrolled in college-level courses are eligible as well. The deadline is May 24, 2014. For more information, see the end of this newsletter.

- ***Life and Learning Proceedings.***  
The UFL's conference proceedings are available through the 2009 conference at [UFL Annual Proceedings](#) link on the UFL web page.

## Publications and member activities

- **Teresa Collett** (Law) spoke at the Conference on Anthropology and Law, sponsored by the Pontificum Concilium Pro Familia, on Thursday, October 24<sup>th</sup>.
- **Reproductive Research Audit** associate **Michael J. New** (Political Science) recently wrote an [article critically analyzing the results of a Planned Parenthood poll](#) that purports to show that support for a 20-week abortion ban is not as strong as other polls had indicated.
- Several UFL members, including **Teresa Collett** and **Maureen Condic** (Neurobiology) spoke at the The Fall Symposium of the University of St. Thomas School of Law Journal of Law and Public Policy Fall Symposium entitled "From Abortion to Infanticide: The Gosnell Trial," held on Friday, October 4<sup>th</sup>.
- Two UFL members presented at the "Humanae Vitae at 45: Life, Liberty, and the Pursuit of Holiness" conference at the Franciscan University of Steubenville held on Friday, Sept. 27. **Richard Fehring** (Nursing), director of the Institute of Natural Family Planning at Marquette University, discussed Humanae Vitae and biology. **Teresa Collett**, presented on Humanae Vitae and the law.
- **Keith Cassidy** (History) has written a review of *The Birth Control Clinic in a Marketplace World*, by Rose Holz. "The Birth Control Clinic in a Marketplace World," *Journal of American History* Vol. 100, No. 2 (Sept. 2013) 569-570.
- **Monica M. Miller** (Theology) wrote "Graphic Images: An Apologia" for *New Oxford Review* (Sept. 2013).
- **Peter Colosi** (Theology) organized the fourth Theology of the Body International Symposium in Fatima, Portugal June 13-16. Recordings of all the talks, including ones by Colosi and **Janet E. Smith** (Moral Theology), are available on the [symposium website](#).
- **Frederick Dyer** (Psychology) was recently interviewed on the [Aleteia](#) web page about Dr. Horatio Storer, he 19th century physician who promoted anti-abortion legislation. The article is called, "You're Alive Today Because of This 19th Century Doctor." There are links to books and articles by Dyer, as well as [these 19th century AMA articles which condemn "therapeutic" abortion](#). (Sept. 12, 2013)
- The recent papal interviews have caused some lively discussion among pro-life activists because of the enthusiastic reception by pro-abortion individuals and organizations of certain remarks about abortion. Some UFL members have written responses:  
  
**Monica Miller** (Theology) wrote, "Unpacking the Pope's PR Debacle- What Happened and What It Means for Pro-Lifers," on "The Pernicious Papist" blog.  
  
**Janet E. Smith** (Moral Theology) wrote an essay for *First Things* called "Are We Obsessed?"  
  
**Richard Stith** (Law) posts two brief comments on the UFL Blog [here](#) and [here](#).  
  
Finally, **Francis Beckwith** (Political Science) posts a collection of essays about Pope Francis's remarks in "[Taming the Constant Francis](#)." Not all of the commentaries he links to are related directly to life issues, but many of them are.
- [Here is a link](#) to **Richard Myers'** (Law) post on [Mirror of Justice](#) highlighting Clarke

Forsythe's new book on *Roe v. Wade*. Clarke has presented some of the work reflected in the book at University Faculty for Life conferences in recent years.

Earlier this year, Linda Greenhouse noted that hardly anyone reads *Roe v. Wade* anymore. Clarke has certainly read *Roe* carefully and his analysis and critique are well worth careful consideration.

- **Chris Kaczor** (Philosophy) recently published *A Defense of Dignity: Creating Life, Destroying Life, and Protecting the Rights of Conscience* (University of Notre Dame Press, 2013) as part of the Notre Dame Studies in Medical Ethics series.

The book addresses beginning- and end-of-life issues in light of the concept of "dignity." "Kaczor investigates whether each human being has intrinsic dignity and whether the very concept of 'dignity' has a useful place in contemporary ethical debates." Specific issues addressed include: ectopic pregnancy, the possibility of "rescuing" human embryos with human wombs or artificial wombs, physician-assisted suicide, provision of food and water to patients in a persistent vegetative state, how to proceed with organ donation following death, and conscience exceptions for health care professionals.

- **Lynn D. Wardle** (Law) wrote, "Equality Principles as Asserted Justifications for Mandating the Legalization of Same-Sex Marriage in American and Intercountry-Comparative Constitutional Law," *BYU Journal of Public Law*. Vol. 27, No. 2 (2013) 489-528. This article presents a speech on equality principles, U.S. constitutional law, and same-sex marriage in America.
- This article by **Frank Beckwith** (Political Science) responds to Giubilini and Minerva's article 'After birth abortion: why should the baby live?' published in the *Journal of Medical Ethics*, which argued for the permissibility of 'after-birth abortion'. "Potentials and burdens: a reply to Giubilini

and Minerva," *Journal of Medical Ethics* Vol. 39, No. 5 (May 2013) 341-344.

## Social Networking

- Don't forget, UFL is on Facebook, Twitter, and LinkedIn. On Facebook you can "like" the "University Faculty for Life" page. On Twitter follow "Faculty4Life". Our blog can be found at [www.uffl.org/blog/](http://www.uffl.org/blog/). There is also an active "University Faculty for Life" subgroup of the "Pro-life Professionals" group on LinkedIn.

## Scholarly Opportunities

**I**n which we highlight opportunities for members to engage in further research on and networking regarding the issues of abortion, infanticide, and euthanasia in their respective fields.

## Calls for papers, conferences, other opportunities

- **Notre Dame Center for Ethics and Culture Fall Conference**. The Notre Dame Center for Ethics and Culture will devote its Fourteenth Annual Fall Conference (Nov. 7-9) to the theme, "Fearfully and Wonderfully Made: The Body and Human Identity." This conference will take up a host of questions related to the human meaning of the body and life as an embodied self from the perspective of many disciplines, including philosophy, theology, political theory, law, history, economics, the biosciences, literature, and the arts. For more information see the [NDCEC web page](#).
- **UFL and Washington and Lee Law Review cosponsor *Roe v. Wade, the Controversy Continues***. The Frances Lewis Law Center of the Washington and Lee University School of Law in Lexington, VA, is sponsoring a

symposium called Roe at 40, The Controversy Continues, Nov. 7-8, 2013. Among the keynote speakers will be Caitlin Borgmann, Professor of Law at CUNY School of Law, and Michael Paulsen Professor of Law at the University of St. Thomas School of Law. Confirmed panelists include several UFL members, including:

**Sam Calhoun** (Professor of Law, Washington and Lee University)

**Teresa Collett** (Professor of Law, University of St. Thomas)

**Lynne Marie Kohm** (John Brown McCarty Professor of Family Law, Regent University)

The event is free and open to the public. Attorneys who want to receive CLE (Continuing Legal Education) credit will have to sign in to memorialize their attendance. For more information, go [here](#).

- On November 5 from 7-8:30 p.m., Clarke Forsythe will be giving a lecture called “Abuse of Discretion: The Inside Story of Roe v. Wade.” The talk is sponsored by the ProLife Center at the University of St. Thomas. It will be held at the Owens 3M Auditorium on the University of St. Thomas St. Paul Campus.

## Resources

**I**n which we highlight scholarly journal and online articles and resources regarding abortion, infanticide, and euthanasia representing all sides of issue.

### Recent and upcoming research and data

- **Political Science.** Justin Buckley Dyer’s book, *Slavery, Abortion, and the Politics of Constitutional Meaning* was recently published by Cambridge University Press. Dyer is Assistant Professor in the Political

Science department at the University of Missouri. The book was endorsed by UFL member **Francis Beckwith**.

- **Law.** A recently-published law review article seriously addresses the abortion-as-a-racist-tactic claim. The author is “pro-choice” and her conclusions are standard pro-choice conclusions, but to her credit she seriously considers and evaluates (tries to refute) the claim that abortion was associated with or had a dimension that supported population control for racists purposes. While arguing that “current claims offered by anti-abortion legislators and activists about race and abortion are flawed,” the author admits: “In the years immediately before and after *Roe*, some abortion-rights organizations *did use population-based arguments for abortion* or form alliances with population organizations. Some population controllers, moreover, *did have ties to the eugenic legal reform movement or work primarily to reduce population among the poor*. Activists involved in the abortion debate, however, tended to focus on population growth among white, middle class individuals, stressing the importance of sexual freedom and environmental preservation. *Belonging to the population-control movement did not necessarily mean that an activist was racially biased.*” Mary Ziegler, “*Roe’s Race: The Supreme Court, Population Control, and Reproductive Justice*,” *Yale Journal of Law & Feminism*, Vol. 25, No. 1 (2013) 50. (emphasis added).
- Also by Ziegler is an analysis of pro-life feminism strategies in the wake of Justice Ginsburg’s dissent in *Carhart* endorsing equality-based claims: “Women’s Rights on the Right: The History and Stakes of Modern Pro-Life Feminism,” *Berkeley Journal of Gender, Law & Justice*. Vol. 28, No. 2 (2013) 232-268.
- The recently-published Volume 24, Issue 1, of the *Stanford Law and Policy Review* (2013), at pages 143-308, contains *inter*

*alia*, six articles discussing *Roe v. Wade*. The pieces are:

Linda J. Wharton & Kathryn Kolbert. "Preserving *Roe v. Wade*...when you win only half the loaf." 143-165.

Rep. Louise M. Slaughter, "Standing for something," 167-170.

Erin Bernstein, "The upside of abortion disclosure laws," 171-214.

Mark Osler, "Roe's ragged remnant: viability," 215-244.

Caitlin E. Borgmann, "Roe v. Wade's 40th anniversary: a moment of truth for the anti-abortion-rights movement?" 245-270.

Michelle Oberman, "Cristina's world: lessons from El Salvador's ban on abortion," 271-308.

- Here are a pair of British articles that suggests the use of the "defense of necessity" to justify making euthanasia illegal and allowing it at the same time. Jonathan Herring, "Escaping the Shackles of Law at the End of Life: R (Nicklinson) v Ministry of Justice (2012)," *Medical Law Review*, Vol. 21 No. 3 (Summer 2013) 487-498; Sabine Michalowski, "Relying on Common Law Defences to Legalise Assisted Dying: Problems and Possibilities," *Medical Law Review*, Vol. 21 No. 3 (Summer 2013) 337-370.
- **Bioethics**. There is a [list of secular biomedical ethics journals](#) on the NIH web page. It includes a link to [this list of journals, books, and other resources](#) on the Canadian Centre for Applied Ethics web page. If you are interested in substantial dialogue with a variety of perspectives on life issues, this would be a good place to look for peer reviewed literature.
- The [U.S. Jérôme Lejeune Foundation](#) has recently released for download an English version of a revised edition of their [Student's](#)

[Guide to Bioethics](#) (*Manuel Bioéthique des Jeunes*, 2006). The guide "puts critical questions facing our society and culture on an objectively scientific basis. It encourages readers to make well-informed judgments based upon **scientific fact** and **sound ethical principles**. The approach is rigorous, yet accessible making this small book a valuable educational tool, not just for young people but also for adults. [Emphasis mine]"

Table of Contents includes: The story of a little human being, Abortion, Prenatal testing, Assisted reproductive technology, Preimplantation genetic diagnosis, Embryo research, The end of life, Organ donation, and Gender theory and sexual orientation

Jérôme Lejeune (1926-1994), who was the geneticist who discovered the cause of Down's Syndrome (trisomy 21), and is a candidate for Catholic sainthood, was an adviser to UFL.

- **Nursing**. Sometimes a study demonstrates what one presumes to be the case. This study "reports that clinicians and nurses of religious beliefs do not support assisted dying and have conservative views on the sanctity of life." N. McCrae, J. Bloomfield, "Mental health nursing and the debate on assisted dying," *Journal of Psychiatric & Mental Health Nursing*, Vol. 20 No. 7 (2013) 655-661.
- **Psychology**. This Israeli study proposes that psychiatrists are "well suited to take a prominent role" in requests for assisted suicide and euthanasia because they will be more likely to be careful because of training; Tal Bergman Levy, Shlomi Azar, Ronen Huberfeld, Andrew M. Siegel, Rael D. Strous, "Attitudes Towards Euthanasia and Assisted Suicide: A Comparison Between Psychiatrists and Other Physicians." *Bioethics*, Vol. 27, No. 7 (2013) 402-408.
- Here are a couple of studies about the effects of abortion on the women who have the abortion. The presumption is that post-

abortion distress can be managed or at least accounted for by some other factor than the trauma of abortion itself. The first article discusses how to overcome the stigma of abortion to help reduce post-abortion distress; Kate Cockrill, Adina Nack, “‘I’m Not That Type of Person’: Managing the Stigma of Having an Abortion,” *Deviant Behavior*, Vol. 34 No. 12 (2013) 973-990. The second article suggests that since women who have abortions tend to be more likely than the general population to have had mental health disorders, then that higher incidents should be taken into account when studying the mental health effects of abortion; Jenneke Van Ditzhuijzen, Margreet ten Have, Ron de Graaf, Carolu H.C.J. van Nijnatten, Wilma A.M. Vollebergh, “Psychiatric history of women who have had an abortion,” *Journal of Psychiatric Research*, Vol. 47 No. 11 (2013) 1737-1743.

- This study finds that abortion is not associated with reduced mental health risks. It does find that there is “association between abortion and small to moderate increases in anxiety risks, alcohol misuse, illicit drug use/misuse and suicidal behavior.” David M. Fergusson, L. John Horwood, Joseph M. Boden, “Does abortion reduce the mental health risks of unwanted or unintended pregnancy? A re-appraisal of the evidence,” *Australian & New Zealand Journal of Psychiatry*, Vol. 47 No. 9 (2013) 819-827. The study is critiqued by Julia R. Steinberg, “Does existing research inform policies authorizing abortion for mental health reasons?” in the same issue.
- **Anthropology**. Here is an anthropological analysis of the use of Aristotle’s notion of “potentiality” in the interaction between Catholic moral philosophers and their feminist critics and interlocutors. The truth of the concept of “potentiality” is not considered philosophically; Lynn M. Morgan, “The Potentiality Principle from Aristotle to Abortion,” *Current Anthropology*, Supplement 7, Vol. 54 Issue Supp 7 (2013) S15-S25.
- **Sociology**. This is a study that shows that, “For some physicians, their hospital’s prohibition on abortion initially seemed congruent with their own principles, but when applied to cases in which patients were already losing a desired pregnancy and/or the patient’s health was at risk, some physicians found the institutional restrictions on care to be unacceptable.” It does not explain why the Catholic Church prohibits certain medical treatments in obstetric emergencies which gives rise to the conflict for the OB/GYNs. Lori R. Freedman, Debra B. Stulberg, “Conflicts in Care for Obstetric Complications in Catholic Hospitals,” *AJOB Primary Research*, Vol. 4, No. 4 (2013) 1-10.
- This article argues that the disproportionate number of abortions among the poor and women of color is not the result of exploitation, but other factors that restrictions on abortions do not address; Christine Dehlendorf, Lisa H. Harris, Tracy A. Weitz, “Disparities in Abortion Rates: A Public Health Approach,” *American Journal of Public Health*, Vol. 103 No.10 (2013) 1772-1779.
- **Medicine**. Forty years after one hundred OB/GYN professors issued a statement in *Contraception*, “100 professors examine the statement of their predecessors in light of medical advances and legal changes and suggest a further course of action for obstetrician gynecologists.” “A statement on abortion by 100 professors of obstetrics: 40 years later,” *Contraception*. Vol. 88, No. 4 (2013) 568-576.
- **Miscellaneous**. The [Charlotte Lozier Institute](#) research arm of the Susan B. Anthony List has published a paper, “[Multi-State Health Plans a Potential Avenue to Tens of Thousands of Publicly Subsidized Abortions](#),” which estimates that up to 10% of U.S. abortions may be publicly subsidized under ObamaCare. Here is an article on *National Review Online* by Chuck Donovan, President of the Charlotte Lozier Institute, that summarizes the report.

## Web pages

- [BioEdge](#)—Bioethics News from Around the World isn't a scholarly site, but it does sometimes point to research and studies. Also, it helps us keep abreast of developments "on the ground." There are also comment discussions of each post.

## Focus on the Disciplines

*In which Carolyn J. Watson, Professor of Art History at Furman University, elaborates the task of a pro-life art historian.*

### Art History and Abortion

In traditional media of the visual arts, such as painting, drawing, sculpture, and ceramics, little has been produced that deals directly with the issue of abortion, at least little that has found its way into public view. Therefore art history has had little to study in a conventionally academic way that is directly relevant to the issue of abortion. An art historical pro-life bibliography would be very slim indeed. However, if the art historical purview is expanded from traditional to more technologically-based media and if art-historical and art-critical approaches can be coupled with methods from other disciplines, the possibilities expand considerably.

Technologically-based media, such as photography, digital imagery, and video, are highly relevant to the abortion debate, which is conducted in images as well as in words. Much could be done to analyze the manipulation and function of images as they are used in contemporary media by both pro-choice and pro-life agents. Art historians could examine images used on the websites and in printed literature of national pro-choice organizations such as Planned Parenthood and NARAL and on the websites of abortion facilities. These could be compared with images on the websites of pro-life organizations and in pro-life literature. Even a cursory examination of this material

suggests that in subjects, composition, and emotional content the pro-choice imagery is sparse and limited and the pro-life imagery is rich and varied. These sets of images—pro-choice and pro-life—could be fertile material for coupling visual and psychological analysis.

Another possibility is to compare the websites of abortion providers with those of providers of other surgical services. On the website of a physician who performs laser eye surgery, for example, images of eyes, corneas, and instruments are readily available, as are clips of the laser procedure and of interviews with the physician. Analogous images, clips, and interviews are absent from the websites of abortion providers. Analysis of imagery might be conjoined with a comparative study of strategies in advertising.

One might also study abortion through the imagery of medical illustration. In preparing material for a freshman seminar on abortion I found that a text on surgical and medical abortion had virtually no images of fetuses. Abortion procedures were illustrated—I assure you this is true—with diagrams that either omitted the embryo or fetus altogether, showing the manipulation of instruments in the theater of an empty womb, or reduced the developing human to a featureless, bean-like shape. Here the study of imagery, or rather of the absence thereof, could be linked with a consideration of the ethical and professional questions raised by such an approach to medical illustration.

In sum, art history can make valuable contributions to the pro-life cause, but the effort will require flexibility in methods and will benefit from collaboration with other disciplines.

## Editor's Corner

IN August I put on the UFL blog that I'd like to begin a series of posts about signs of hope in the academy. There has been a lot of bad news lately, esp.



involving the federal government. There have also been some signs of hope in our society, such as the Texas legislative battle and abortion clinic closings.

I've seen many articles about the distress in the academy, the demise of a genuine liberal arts education, the chronic illiteracy of students, and their tendency to fall under the influence of radically anti-life ideas.

As the school year continues I'd like to elicit from you any concrete signs you've seen in your work in the academy of real progress in the development of a culture of life. I'm thinking of anecdotes about actions, programs, events by students, by faculty, or by administrators that show that something is stirring among young collegians and among the academics. It could be anything from an increase in evidence in student work of pro-life sentiment to new centers and institutes. Anything in your daily work that makes you say, "There's hope!"

I personally know some very zealous pro-life undergrads, thousands of whom gather annually in DC for the March for Life. I'm also excited about the new [Prolife Center at the University of St. Thomas](#).

If you would like to contribute a sign of hope, please e-mail me at [provitanews@yahoo.com](mailto:provitanews@yahoo.com). It will be included in a summary article in the next *ProVita Online Newsletter*. If you want your name used in the post or article, let me know. Otherwise I'll presume you want to be anonymous.

Please begin to think about items for next issue, which will come out in October, 2013. We need

- Notices of member's publications, presentations and other activities,
- Calls for papers and notices of upcoming conferences.
- Citations of relevant significant research in any discipline, whether from a pro-

life perspective, neutral, or the opposing perspective.

- Useful online and print resources.

You can send them to me any time. I will put them on the [blog](#) first, and then put them in *ProVita*. Any contributions may be forwarded to [provitanews@yahoo.com](mailto:provitanews@yahoo.com).

## Masthead

Publisher [University Faculty for Life](#)

Editor [Robert F. Gotcher, Ph.D.](#)

Technical [Stephen Feher, of the Ridgefield Group](#)

*ProVita* is the quarterly online newsletter of the [University Faculty for Life](#). Its purpose is to promote research, dialogue and publication by faculty who respect the value of human life from inception to natural death, especially focusing on abortion, euthanasia, and infanticide. More information about UFL can be found on our web site at [ufl.org](http://ufl.org). Editorial correspondence can be sent to the editor at <mailto:provitanews@yahoo.com>.

University Faculty for Life Scholarly  
Achievement Award  
in Creative Writing, Literary Criticism, or  
Research

\$600 total prizes  
Possible presentation of work at annual  
conference  
Opportunity for publication

University Faculty for Life is accepting submissions from college or university students for its Scholarly Achievement Award. The contest is open to undergraduate and graduate students at any higher education institution (community college, medical school, seminary, university, etc.); postsecondary students enrolled in college-level courses are eligible as well.

The contest has three categories: Creative Writing, Literary Criticism, or Research. Multiple submissions are permitted. Work submitted in any category must demonstrate the application of a life-affirming perspective on abortion, infanticide, euthanasia, or related issues.

The student scholars who win in any category may be offered an opportunity to read their work before the annual conference of University Faculty for Life to be held 6-7 June 2014 at Fordham University (Bronx, New York). They may have their work published on UFL's website and in conference proceedings. Finally, first-place winners in each category will receive \$200.

University Faculty for Life is an organization of scholars dedicated to the intellectual and scholarly inquiry of abortion, infanticide, euthanasia, and related issues. Since an increasing majority of college and university students are pro-life, UFL members would like to help these students by encouraging them to strive for scholarly excellence as they examine

the life issues and by assisting them in building a publications portfolio.

**Entries must be emailed or postmarked before 11:59 PM EST, Saturday, 24 May 2014**

#### Rules

1. Students must be enrolled in a higher education institution before the contest deadline; a photo or emailed copy of an identification card with current institutional sticker will suffice.
2. The student shall affirm in a cover letter that the work submitted is the student's original work. Please enclose address and contact information in this letter.
3. Essay submissions must be a minimum of six but no more than ten pages; poetry submissions can be of any length. Both essay and poetry submissions must be double-spaced.
4. Students retain the right of publication.
5. A panel of judges will evaluate submissions based on the quality of research and the demonstration of strong communication and critical thinking skills. Correct grammar and punctuation are required. Research must follow either the *APA Manual* or the *MLA Handbook for Writers of Research Papers*, latest editions. The judges reserve the right to give a second place, third place, honorable mention, or no award if the quality of the submissions merits such action. The decision of the judges is final.
6. Students should submit their work electronically in Word format to [Dr.JeffKoloze@att.net](mailto:Dr.JeffKoloze@att.net). The cover letter and a hard copy of the paper may be mailed to UFL Scholarly Achievement Award, 10019 Granger Road, Garfield Heights, Ohio 44125-3101.