

Progressive and Conservative “Freedom” Through the Lens of FOX and MSNBC

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Abstract

This research examines the framing of health care and immigration policy debates by high profile cable television (TV) pundits on FOX News and MSNBC. The study uses an interpretive framework to apply Lakoff's (2006) conceptualization of “freedom” as a contested idea within political discourse in the United States. Qualitative content analysis was used to examine 322 TV transcripts. Findings indicate that in both the health care debates of 2009 and immigration debates of 2010, conservative and progressive cable TV pundits overtly drew on deep frames that produced inherently contradictory conceptualizations of “freedom” in political discourse. Conservatives framed government health care as an intrusion on personal freedom, yet applauded government intervention on the issue of immigration in the name of security, whereas progressives framed access to health care as security for the greater good, while viewing immigration legislation as racial profiling and a violation of personal freedom. Employing a qualitative approach to the study of cable TV pundits provides insight into how framing processes are communicated and reinforced in the midst of political debate.

Keywords

framing, health care, immigration, FOX News, MSNBC, qualitative content analysis

On February 24, 2009, in a joint address to Congress, President Obama set forth his policy goals for health care reform. Just a few weeks later, on March 5, 2009, he held a health care summit with lawmakers and business leaders, and by May 13, 2009, House Speaker Nancy Pelosi noted that a comprehensive health care plan would be passed before the August recess (“Timeline for Healthcare Legislation,” 2009). These announcements set off a firestorm of criticism from Republican lawmakers as well as conservative media. The height of these debates occurred in the summer of 2009, when the rationing of care, “death panels,” and town hall protests against health care reform, in the name of “liberty” and “freedom” became daily fodder for FOX political pundits. Shortly after health care reform legislation was passed in March 2010, another highly contested political debate ensued when Governor Jan Brewer of Arizona signed Senate Bill (SB) 1070¹ into law on April 23, 2010. It was celebrated by conservative political analysts as a “get tough on crime” measure, while progressives highlighted it as racial profiling, and brought into question “whose freedom” was being violated by the law. While health care reform brought out protesters from the Tea Party Movement, SB 1070 harnessed opposition from immigrant rights and human rights groups.

This research examines the way in which political television (TV) talk show pundits (hosts) tapped into both conservative and progressive emotional sentiment on debates over

health care and immigration policies. We examine the way that TV pundits use different frames and metaphors that speak to the contested concepts that surround the definition of “freedom” in the United States used by progressives and conservatives (Lakoff, 2006). Entman (1993) suggested that “framing is often defined casually, with much left to an assumed tacit understanding of reader and researcher” (p. 52). He noted that frames define problems, diagnose causes, make moral judgments, and suggest remedies (Entman, 1993). This research seeks to examine the framing of health care and immigration debates in the United States within this context.

The primary research questions for this study were as follows:

Research Question 1: How do high profile FOX and MSNBC news hosts frame health care and immigration debates?

Research Question 2: How do they call upon contested definitions of “freedom” in the framing of these debates?

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Research Question 3: What type of delivery style do FOX and MSNBC hosts use to discuss health care and immigration debates?

Research Question 4: How do they address frames put forth by hosts on the opposing cable network?

In answering these questions, our data and analysis give insight into the way in which frames are constructed in the midst of policy debates, and how such frames give rise to highly politicized environments for policy discussions. While network news program hosts are tasked with taking on the role of a depoliticized deliverer of the news, high profile cable TV news pundits are tasked with providing an interpretation of events through a political lens. The role of the cable TV news host is to frame debates, while the network news host's task is to appear neutral. This has implications for the new role that partisan cable news plays in contemporary political discourse. While very few studies have examined cable news as the unit of analysis, even fewer have analyzed the specific role of individual hosts in the framing process. The findings of this study therefore inform both a micro-level understanding of the framing process in action, as well as a broader understanding of the powerful role that cable TV news pundits play in the early stages of the framing of policy issues.

Background

FOX News was created in 1996 by Rupert Murdoch, CEO of News Corp, as a 24-hr cable news channel. MSNBC was also founded in 1996 by Microsoft and General Electric and today is under the NBCUniversal umbrella and owned by Comcast. The increased viewership of political cable news programming and its entertainment style format has caused researchers to focus on these networks in addition to broadcast news. Studies have primarily focused on brand development, the format of cable news programming (specifically the use of divisive language and confrontation), and the effect programming has on audience perception and public opinion. Equally important have been studies examining an increase in political polarization among viewers stemming from cable news programming.

Branding

Cable news networks are well known for developing "brand personalities" and have contributed to a broader shift in TV news from hosts who take on an assumed position of objectivity to hosts who take on a clearly partisan stance. Not only have news programs and entire networks become a mouthpiece for specific partisan/political positions, but they have also shifted into an entertainment format (Chan-Olmsted & Cha, 2007; Coe et al., 2008; Jones, 2012; Pew Research Center, 2004). This shift in brand strategy has often included "political brokering, leveraging of public opinion, sensationalist news formulas, and custom media content" (Arsenault & Castells, 2008, p. 488).

Cable news programs have been successful at creating brands that stand in contrast to those of network news programs; however, the particular perceptions of cable channels varies. In a small exploratory study, respondents described networks ABC, CBS, and NBC as "more traditional and liberal" than cable news stations CNN, FOX, and MSNBC, which were seen as more "analytical, confident, daring, trendy, contemporary, and conservative" (Chan-Olmsted & Cha, 2007, p. 142). A subsequent study of brand personality found that NBC and FOX News are perceived in a more positive light than other networks, with FOX News using political ideology and opinion-based programs as a means for successfully differentiating itself (Chan-Olmsted & Cha, 2008). In contrast Oyedele (2009) examined audience loyalty, media use, and perceived quality of CNN and FOX News, finding that opinions of CNN were significantly more positive than those of FOX. Similarly Oyedele and Hou (2010) examined customer-based brand equity for online news outlets finding that stories on the CNN website were perceived as more credible than stories on the FOX News website. Cable news also distinguishes itself and its brand by having greater diversity in reporters/analysts than broadcast networks. For example, Zeldes, Fico, and Diddi (2012) found that broadcast networks (ABC, CBS, NBC) had fewer female and non-White sources than did cable networks (FOX and CNN) and Public Broadcasting Service (PBS) evening news during coverage of the 2008 presidential election.

Cable News Pundits and Divisive Language

The use of divisive language by personality-driven cable news hosts has long been the focus of a number of watchdog groups such as Media Matters, Fairness and Accuracy in Reporting (FAIR), Alternet, and the Southern Poverty Law Center, who have all raised concerns about hate-speech, name-calling, and aggressive language (Lederman, 2010; Macdonald, 2008; Rendall, 2009). Not until recently have academics studied divisive language on these programs. The few studies that have been conducted primarily highlight FOX News hosts (Conway, Grabe, & Grieves, 2007; Farrant & McPhail, 2010; Massing, 2009), while others profile progressive hosts (Lisheron, 2007; Morabito, 2011; Quart, 2009).

For example, Conway et al. (2007) examined propaganda techniques used by Bill O'Reilly to construct frames of "good" and "evil" by describing undocumented immigrants as illegal aliens, terrorists, and villains who are "dangerous, out of control, causing chaos, and threatening the American way of life" (Conway et al., 2007, p. 205). Massing (2009) similarly highlighted divisive language used by conservative pundits, in this case toward President Obama who has been called "a Muslim, a Marxist, a radical, a revolutionary, a socialist, a communist, a thug, a mobster, a racist . . . and associate of terrorists" (p. 14). Divisive language is not solely used by conservative commentators. In a study by Weaver and Scacco (2013) on the Tea Party movement, findings

indicated that MSNBC program hosts were more likely to marginalize the Tea Party than CNN or FOX hosts, calling its members “idiots” and questioning the grassroots nature of Tea Party membership. Boykoff and Laschever (2011) similarly found that a “non-mainstream frame” was used more frequently by MSNBC news sources than an “everyday American frame” to describe Tea Party members.

Hostility and Confrontation News

Directly tied to divisive language is the hostile nature of hosts on many cable news programs where the format of programming is based on a confrontation between host and invited guest. Although this may boost ratings, scholars have found that viewers are more likely to distrust political institutions after watching conflict-ridden programming (Forgette & Morris, 2006) and that Republican FOX News viewers are more likely to perceive the media as hostile than Democratic viewers (Hoffner & Rehkoﬀ, 2011). In research conducted on outrage discourse, Sobieraj and Berry (2011) found that conservative media was much more likely than liberal media to use outrage tactics and elicit a “visceral response from the audience” (p. 19). Blitvich (2010) has also examined “news as confrontation” on shows such as the *O’Reilly Factor* where the host builds rapport with some guests while showing incivility to guests who differ from him ideologically, to reaffirm a worldview.

Hostility toward particular groups by cable news outlets has also been studied. Cagle, Cox, Luoma, and Zaphiris (2011) analyzed online articles from FOX News, CNN, and National Public Radio (NPR) on the proposed Islamic Center in New York and found that CNN provided negative opinions of Muslims in various stories; FOX News provided far more negative viewpoints than positive; while NPR provided more balanced accounts. Vultee (2009) focused exclusively on FOX News coverage of the Islamic Center, finding a larger conservative political purpose for the network’s “orientalizing” of the Islamic world.

Partisanship and Polarization in News Reporting and Viewership

Scholars have focused not only on divisive language and hostile style formats of cable news networks, but also on bias and partisanship on the part of networks in their coverage. Not surprisingly, FOX News has been found to give favorable coverage to the Republican Party and, on the issue of the Afghanistan and Iraq wars, FOX News was much more likely to support the Bush Administration than NBC network news (Morris & Francia, 2010). However partisanship is not exclusive to FOX News. Groeling (2008) examined coverage of presidential approval ratings finding that while FOX News was more likely to report good news for President Bush and bad news for President Clinton, CBS and NBC favored the reverse, with ABC being the only network found

to favor positive approval ratings for both candidates. Partisanship by cable news outlets was also clearly present following the passage of President Obama’s health care legislation. McDermott (2010) compared CNN, FOX, and MSNBC news coverage the day following the health care legislation compromise by the U.S. Senate. Findings indicated that FOX analysts Sean Hannity and Bret Baier portrayed it as a single-payer plan in disguise, CNN’s Wolf Blitzer focused on the politics of the compromise, while MSNBC’s Rachel Maddow and Chris Matthews focused on how insurance companies were benefiting.

Increasingly, researchers have looked at not only cable news coverage but also viewer’s perceptions of that coverage. The distinction between journalistic analysis and personal opinion is not only difficult for viewers to discern, but also difficult for journalists themselves to decipher (Thomas & Hindman, 2015). Coe et al. (2008) found that the blurring of hard and soft news on CNN and FOX News, as well as Comedy Central’s *The Daily Show*, has caused viewers to “perceive bias in programs and content that do not align with their own partisan perspective” (p. 215). Kowalewski (2013) found that when viewers disagreed with information being presented “comedy news was more successful in the transfer of issue salience than hard news” (p. 1). A Pew Research Center (2004) study found that news audiences are becoming increasingly politicized, with CNN having a more Democratic leaning audience and FOX News having an overwhelming Republican viewership. Political polarization has also extended into online news media with FOX News garnering more attention from Republicans and CNN and NPR more attention from Democrats (Iyengar & Hahn, 2009).

Researchers argue that the saturation of news on the Internet is actually narrowing people’s exposure to news, rather than broadening it (Iyengar & Hahn, 2009). Baum and Groeling (2008) found that Americans are increasingly reliant on partisan websites and blogs such as DailyKos.com (liberal), FreeRepublic.com (conservative), and FOXNews.com (conservative) for election information and argue that this polarization is a challenge to democracy. Stroud (2010) found that political polarization is both a cause and effect of viewers’ selective exposure to liberal or conservative media outlets (including MSNBC, CNN, and FOX). Wicks, Wicks, and Morimoto (2014) similarly found selective exposure during the 2012 presidential campaign with conservatives more likely to seek out Christian broadcasting and Fox News for election information and liberals more likely to seek out PBS and Facebook. Partisan media effects have also been found to be more strongly related to viewers’ exposure to negative cable news coverage of the opposition candidate than to positive coverage of the in-party candidate (Smith & Searles, 2014).

Cable news viewership is not solely driven by partisanship, and although individuals consume programming that reflects their political beliefs, it does not necessarily mean that they avoid programming that diverges from those beliefs

(Holbert, Hmielowski, & Weeks, 2012). Analyzing the relationship between viewership of FOX, CNN, and MSNBC, Feldman, Maibach, Roser-Renouf, and Leiserowitz (2012) found that Democrats' beliefs about global warming did not vary as a function of their cable news consumption; however, Republicans' beliefs about global warming did vary based on whether they watched high levels of FOX or high levels of CNN/MSNBC. Similarly, Morris (2005) found that "FOX News watchers have perceptions of political reality that differ from the rest of the television news audience" (p. 707). On the issue of immigration, Gil de Zúñiga, Correa, and Valenzuela (2012) controlled for viewers' sociopolitical ideology yet still found that watching FOX News was associated with negative perceptions of Mexican immigrants for both Republicans and Democrats indicating that "people's ideological predispositions do not act as a barrier against the negative effects of FOX News on people's perceptions" (p. 610).

In a study on support for voter ID laws, Wilson and Brewer (2013) found that in addition to ideology, party identification, and racial attitudes, the only form of media use that was significantly related to support for such laws was watching Fox News. In addition to the effects on public opinion, scholars have studied the effect FOX news has had on elected officials. Clinton and Enamorado (2014) examined whether the actions of elected officials across the United States changed with the establishment and spread of the Fox News Channel from 1996 to 2000. Researchers found that "elected officials became slightly less likely to publicly support President Clinton once Fox News entered the district" (Clinton & Enamorado, 2014, p. 22).

Of the approximately 35 peer reviewed studies ever conducted on cable news programming, almost all have employed quantitative methods. To date, only six peer reviewed studies have employed exclusively qualitative methods that include a genre-approach, qualitative content analysis, textual analysis, and discourse analysis (Blitvich, 2010; McDowell, 2004; Peck, 2014; Sobieraj & Berry, 2011; Thomas & Hindman, 2015; Vultee, 2009). Qualitative inquiry and analysis has been an underutilized approach in this area. As Lens (2002) notes, qualitative content analysis allows researchers to dissect public language and "provides insight into how prevailing ideologies are communicated and reinforced" (p. 137). This research employs a qualitative approach and interpretive framework that allows us to capture framing processes that occur in the midst of political debate.

Interpretive Framework

While previous scholarly research on cable news has focused on program format, bias in coverage, partisanship, and viewer perception, there has been very little research on the processes used by cable news hosts to frame specific political debates. Important to the analysis of cable news programming is a

deeper understanding of how cable news hosts frame debates by calling upon deeper metaphors that resonate with the American public. This research does that by using both media framing (Altheide, 1996; Entman, 1993) and the "essentially contested concept" of freedom (Lakoff, 2006) as an interpretive framework for examining how high profile cable TV news hosts on FOX and MSNBC frame health care and immigration policy debates.

Framing as a concept originated with Erving Goffman and his seminal book *Frame Analysis*. Goffman (1974) focused on how people unconsciously create frames and cognitive structures to guide perceptions of reality and structure experiences in their social lives. Fillmore's (1977) linguistically based theory of framing was developed shortly after and focused on how words can activate or evoke a semantic frame. Since that time, frame analysis has become interdisciplinary and been applied widely in social movement and media studies research (Boykoff, 2006; Entman, 1993; Gamson & Meyer, 1996; Sivek, 2008; Snow & Benford, 1988, 1992). Scholars such as Altheide (1996, 1997) have studied how the framing process is related to communication format (organization, timing, and style of a program), themes (parts of the storytelling process that are recognizable to an audience), discourse (a way of discussing an issue), and frames (a boundary for discussing an issue or event). More recently framing has been used by scholars to specifically examine how the media shapes political discourse on a number of issues including the Iraq War (Aday, 2010; Aday, Livingston, & Hebert, 2005; Altheide & Grimes, 2005; Harmon & Muenchen, 2009; Schwalbe, Silcock, & Keith, 2008), Hurricane Katrina (Lynch, 2007; Melican, 2007), the Patients' Bill of Rights (Rabinowitz, 2010), Abu Ghraib Prison (Del Rosso, 2011), the Great Recession (Peck, 2014), and gun control (Callaghan & Schnell, 2001).

Drawing on Fillmore's (1977) work, Lakoff (2002, 2006) discusses framing in political discourse by analyzing the importance of metaphors in shaping communication and understanding. As Lakoff suggests, there is a simple uncontested core that defines "freedom"; however, progressives and conservatives overlay this core with other meanings. The blanks that are filled in to flesh out the simple, uncontested version of freedom are derived from the metaphorical understanding of the State as either a Strict Father or Nurturant Parent. These characterizations of the State have numerous related concepts that form the foundation of progressive and conservative ideology, thus contributing to our reasoning about the role of government in all facets of public and private life (Lakoff, 2002).

Several scholars have used Lakoff's work to identify how metaphor shapes political discourse on various issues including the Million Mom March (Hayden, 2003), the Iranian Green Revolution (Pérez-Sobrin, 2013), editorial cartoons (Bounegru & Forceville, 2011), the Iraq War (Lule, 2004), weapons of mass destruction (Billig & MacMillan, 2005), and presidential speeches (Deason & Gonzales, 2012). In

this study, we similarly draw on Lakoff's work to uncover how cable TV news hosts frame immigration and health care debates in political discourse. In this case, we do so through an analysis of the contested concept of "freedom" in American culture and the perceived role of the State in protecting such freedoms. It allows us to see how frames are constructed across issues in both coherent and contradictory ways by political TV pundits. More importantly, this research shows how frames are not created from scratch by hosts, but instead tied to existing social and cultural contexts in order for them to take on meaning and resonate with viewers.

Method

Our research study employs qualitative content analysis to examine how high profile, personality-driven, political TV talk show hosts conceptualize and define "freedom" to frame health care and immigration policy discourse. By using qualitative methods, our analysis seeks to understand the social context through which messages are communicated and how political talk show hosts may interpret or acknowledge the framing of issues by ideological foes.

The content analyzed came from TV broadcast transcripts from three FOX News programs (*The O'Reilly Factor*, *Hannity*, and *Glenn Beck*)² and three MSNBC programs (*Countdown With Keith Olbermann*,³ *The Rachel Maddow Show*, and *Hardball With Chris Matthews*). The search dates for health care were between February 24, 2009 (the day President Obama announced his policy goals for health care) and March 30, 2010 (the passage of health care reform legislation).⁴ The search dates for immigration were between November 5, 2008 (post election) and July 29, 2010 (when SB 1070 was scheduled to go into law). In the LexisNexis® Academic search engine, separate searches were conducted for the term *health care* with each host's name as well as the terms "immigrant" and "immigration" with each host's name. We randomly sampled and coded 212 transcripts on the issue of health care and 110 transcripts on the issue of immigration using the NVivo software program. We proportionately oversampled transcripts during the peak periods of time that the two policy issues were being debated (July-September 2009 for health care debates and April-July 2010 for the SB 1070 immigration debates).

Data Analysis

Progressive and conservative concepts of "freedom" lay at the heart of how FOX and MSNBC cable news hosts framed both the 2009 health care debates and 2010 immigration debates. The frames around what "freedom" and "security" mean were overtly used by political pundits during both the health care debates of 2009 and immigration debates of 2010, but in very different ways. It was a battle between a conservative frame, which portrayed universal health care reform as something that would infringe on the individual

freedoms of Americans, and a progressive frame, which viewed universal health care reform as something that a caring nation provides its citizens. In contrast, while conservative hosts viewed government as infringing on individual freedoms in the health care debates, when it came to Arizona's SB 1070, the conservative frame called upon government to enforce security and protect its citizens from the illegal "others" who threaten "our" freedoms. Progressive hosts, however, viewed government policies promoting racial profiling of Arizona citizens as a threat to individual freedom and civil liberties.

Health Care Reform

One of the most clear and overt ways that conservative political TV talk show hosts critiqued health care proposals by Democrats was to link universal notions of health care as a reflection of a "nanny state." While the progressive understanding of freedom is focused on using collective resources for the common good so that citizens can pursue individual goals, the conservative frame is focused on the marketplace as a vehicle for citizens to pursue individual goals. As a result, the conservative frame views government as "inefficient, bureaucratic, and wasteful" (Lakoff, 2006, p. 102). We found the "nanny state" portrayal by conservative pundits was linked explicitly to socialism, communism, and fascism. Early in 2009, conservative TV hosts began warning the public that socialism and communism were coming and that health care was just the first step. The following quote from Glenn Beck is illustrative of such warnings.

Let me tell you something, America. March to socialism. It is happening in our country and it's not going to come with a big huge package. They're not going to talk to you about government health care. They're going to do it one piece at a time. (Beck, January 22, 2009)

By August, Beck is linking communism with health care and President Obama's agenda.

Universal education and universal health care is the way to help the underprivileged. The green movement is about—is really . . . is about social justice and spreading the wealth, communism. (Beck, August 11, 2009)

Beck's framing of health care proposals to help the poor and disadvantaged as "communist" take conservative notions of "freedom" to the extreme, solidifying any government intervention for the common good as an expression and violation of individual freedom. Historically American culture has framed communism as the antithesis of freedom—think Red Scare, USSR, Cuba, Viet Cong. Framing can be on two levels—surface frames are associated with words while deep frames structure peoples' worldviews (Lakoff, 2006). The way in which conservatives have reframed "freedom" from its progressive origins to fit a conservative worldview, is an

example of deep framing. In this case, Beck uses language to reframe government health care reform as not only inefficient and bureaucratic (a common Republican critique) but also as something more sinister that is slowly going to take away the freedoms of Americans. Joining Beck's warning of socialism and the "spreading of wealth" is Bill O'Reilly:

They want socialism, because it's economic justice. Don't you see that? They want to redistribute the money so that everybody has a bit more and the rich have a bit less. (O'Reilly, February 19, 2009)

O'Reilly's framing of the issue is similar to Beck's in that he taps into the notion that health care legislation is really a plot to redistribute the wealth. It reinforces the conservative frame that the market creates a meritocratic society where individuals are left to sink or swim. Those who survive are morally superior and capable, whereas those who sink are by default immoral. As Lakoff (2006) notes, "winners can beat losers in competition without it being seen as an imposition on the losers' freedom" (p. 105). The marketplace itself is equated with freedom, and any government regulation to curtail the market is viewed as an imposition on freedom. Building on this notion of conservative freedom is Sean Hannity:

I'm telling you that there are those in Congress that see this as—it's no longer about big government or limited government. I think this has really become more fundamental. This is about socialism versus capitalism. (Hannity, April 14, 2009)

And coming up, the president has been praising the Mayo Clinic's model of health care but wait until you hear what they have to say about his nanny state, cradle to the grave, womb to the tomb, nationalized health care, socialized system. (Hannity, July 21, 2009)

Throughout the qualitative analysis of the transcripts, we found that during the summer of 2009 conservative hosts used terms such as "socialist" and "communist" interchangeably and repeatedly. The warning from conservative hosts was that health care legislation is a threat to the entire capitalist system and freedom itself. For progressives, the expansion of health care was not viewed as a threat to individual freedom. Instead the free market, in the form of profit driven health insurance companies, was viewed as a threat to the common good. This is evident in the sarcastic commentary delivered by Maddow:

In totally coincidental, unrelated news, America's health insurance plans, the national association that represents more than 1,000 insurance companies have just put out a list of talking points. The things they want real Americans to say at these town hall events. Here's your script, real people—written for you by the health insurance industry, which isn't trying to manufacture the appearance of grassroots opposition at all. (Maddow, August 6, 2009)

Maddow's concern is the freedom of the political process, which is threatened by the undue influence of the health

insurance industry. The progressive framing of the health care debates brings forth the idea that the will of a few powerful industry insiders is being imposed and limits the freedoms of the general public to openly debate health care reform. Similarly, Olbermann points to the threat the insurance industry poses to the independence and freedom of the political system.

Betsy McCaughey is an adjunct senior fellow at the Hudson Institute, a think tank funded by—wait for it—drug companies, drugstore chains and biomedical suppliers whose former trustee once ran the same health insurance group whose "Harry and Louise" ad helped to torpedo health care in the '90s. McCaughey herself wrote to pharmaceutical trade group, PhRMA, quote, "Asking PhRMA to support my work at the Hudson Institute because my writings on health care policy can make a substantial difference in public opinion and in the nation's capital." (Olbermann, February 9, 2009)

The most controversial framing of the health care legislation by conservatives occurred in late July and early August of 2009 after Congress went home for the August break and town hall meetings took place. Many of these meetings were attended by Tea Party Movement activists, and the language of "freedom" and "liberty" dominated the discourse at these meetings. In a series of programs in August 2009, MSNBC host, Chris Matthews, attempted to bring attention to overtones of racism at town hall meetings (represented by the birther movement and posters of President Obama with a Hitler mustache) and violence (represented by attendees carrying guns). In similar attempts to deconstruct the frames, Olbermann highlights the words of a woman at a town hall meeting.

When those congressmen took questions yesterday at Arkansas children's hospital in Little Rock, one woman was nearly reduced to tears. Not because she fears health care insurance will be taken away but because she fears her America has been taken away. (Video Clip of unidentified female at event saying—"I have never seen my America turned into what it has turned into, and I want my America back"; Olbermann, August 6, 2009)

Although the woman never expresses "who" she wants to take her America back from, it is up to the listening audience to fill in the possible blanks—illegal immigrants, Blacks, gays, liberal elites, non-Christians, big government, and so forth. Additional frames set forth by conservative hosts focused on the rationing of care and "death panels." Often a guest would appear on a show and put forth a worldview already supported by the host; for example, when Dick Morris⁵ discussed "health care rationing" in an interview with Hannity:

Morris: The government is going to set either through the competition of a private-government plan or to actual regulation, health care rationing. And let me explain what that means. It

means that if you are 75 years old you are not getting a hip replacement, you're not getting a knee replacement. (Hannity, June 15, 2009)

Dick Morris asserts that health care will be rationed, or taken away by the government. Conservatives view the perceived imposition by government and loss of health care as a loss of freedom. Second, he uses fear to scare seniors, which evokes the strict father model in the minds of many Americans who seek protection from a perceived threat. The most outrageous statements came from Glenn Beck when he sought to equate health care legislation with eugenics and the Nazis.

What most history textbooks seemed to ignore is that before the Nazis took power, Germans lagged behind Americans and Europeans in eugenics. But World War I and the great flu pandemic basically turned doctors into social planners, and Hitler and the Nazis took the logic of public health to totalitarian extremes. (Beck, August 11, 2009)

Following this statement, Beck emotionally spoke of his daughter, who has cerebral palsy, and noted how Hitler eliminated the disabled, insinuating that would be the inevitable result of nationalized health care. The fact that Beck's assertions are completely false is irrelevant to political framing. As Lakoff (2006) argues, frames trump facts, "for facts to make sense they must fit existing frames and metaphors in the brain" (p. 13). The "death panel" rumors were so pervasive that President Obama addressed the issue by refuting claims that he would not "pull the plug on grandma" (Kornblut & Shear, 2009). At the same time, MSNBC hosts Olbermann, Maddow, and Matthews made it their job night after night to refute, deconstruct, and counter statements by FOX hosts:

... this stuff about euthanasia, this stuff that's been talked about, the plug-pulling, the death panels that Sarah Palin, who's become sort of the patron saint of these people—it's really getting wild. (Matthews, August 11, 2009)

The not too bright pusher of the "death panel's" lie is now boasting that she has, in turn, killed them off. Sarah Palin celebrates her part in terrifying the unthinking people she was supposed to protect. (Olbermann, August 14, 2009)

The framing of the health care legislation by FOX hosts became so widely discussed that the issue of "death panels" was debated on Sunday morning ABC news program *Meet the Press*. On the program, Maddow attempted to get to the bottom of the origins of the rhetoric. She drew attention to a quote from the website ResistNet.com, an organization that can be traced back to a Washington, D.C., Republican public relations firm:

You want to know specifically about what they say about health care? Well, there's this helpful post, quote, "Waiting lines will be long. Others will die. Why is this being done? Back door

reparations. I pray that God will strike Obama dead and all who stand with him, they are evil." (Maddow on ABC *Meet the Press*, August 16, 2009)

By presenting facts, Maddow attempts to bring evidence to bear on what is behind the town hall protest movement during the summer of 2009. However, Lakoff (2006) argues that it doesn't work when progressives try to fight conservative frames with facts, "important national policies are made on the basis of deep frames, which characterize our most abiding values and define who we are morally, socially, and politically, and facts, that is, realities made urgent by those values" (p. 14). This is not to say that facts don't matter, however, without the proper framing, the facts that Maddow is trying to convey cannot be communicated.

In this case, the conservative media was highly effective in evoking fear and tapping into a deep frame—the idea that the federal government will take away the freedom of Americans to choose life or death. In fact, a Pew Research Center (2009) Study surveyed the American public and found that 86% of the population had heard of the death panel claims as of August 2009. A follow-up study indicated that Fox News viewership for both Republicans and non-Republicans was positively related to "mistaken beliefs" about death panels (Meirick, 2013).

Immigration

While health care received considerable cable news coverage from MSNBC and FOX during President Obama's first term in office, immigration received far less coverage; however, coverage did increase during debates over Arizona's SB 1070. FOX hosts framed the story as taking place in Anytown, USA, which is populated by hardworking, "legal" Americans who have found their dream and want to hold tight, who fear for their safety and the safety of their families from the brown "illegals" hunting them down—who bring crime, murder, and mayhem to their otherwise peaceful town. It was a way that these true Americans could "protect our own." Both O'Reilly and Beck emphasized the rule of law on their programs with the following statements:

Also a new Rasmussen poll says 61% of Americans want the Arizona law in their state. Just 28% do not. So it's clear the vast majority of Americans understand the Feds have not controlled illegal immigration and that the states, the individual states have a right to protect their own citizens, especially when the federal government will not. (O'Reilly, July 9, 2010)

There are 460,000 illegal aliens living in Arizona. We're not the show-me-your-papers country. We're not. But we are a nation of laws. We used to be known around the globe as a nation of equal justice, not social justice. (Beck, April 27, 2010)

For conservatives, the role of government in providing "security" is narrowly defined and restricted to protecting

citizens from harming one another through oversight by agencies such as local police, FBI, Homeland Security, and the military. The strict father model frames undocumented immigrants as lawbreakers who should be punished. The progressive frame, however, uses the nurturant parent model, which views undocumented immigrants as exploited in the labor market and serving the needs of elites (Lakoff, 2002). The frame of “moral law-abiding” citizens versus “immoral illegal aliens” continued to be emphasized on a Glenn Beck Program entirely devoted to the Arizona immigration issue. The stress is on the word “legal” as he opens up the show. Before we hear from the chosen group, the scene is set by Beck, invoking the Statue of Liberty. Beck moves into expressions of incredulosity as he reviews the language used by other networks, namely, MSNBC hosts, who have been identifying SB 1070 as the “papers please” legislation. Beck argues that SB 1070 is written in such a way that it is virtually impossible for it to be abused:

It's been my experience that police officers—and I think most people in America, along with members of the military, police and members of the military represent the finest among us. Not in every case. There are bad cops. There are bad—there are bad everything. But the vast majority are just Americans; they're good. They're people that risk their life every day to protect us. (Beck, May 6, 2010)

Again, the strict father model and rule of law frame is emphasized by Beck. He also identifies Arizona police as “one of us” in this scenario, people who put their lives on the line for our freedoms. This construction of freedom is unique to the conservative frame and also incorporates “nurturant conservative communities,” a model that includes in-group nurturance and out-group strictness. As Lakoff (2006) explains, as long as you go along with the morality and values of the group, you will be nurtured. In this case, the legal immigrants (in-group) follow the rules and are considered upstanding citizens, while the illegal immigrants (out-group) are breaking the law, and therefore criminals.

To reinforce this frame of immigrants, Beck has chosen a select group of participants to speak on the issues and these are the people who have “done it the right way.” The first panelist is a Vietnamese American woman who came to the United States in 1972 as a refugee—the story evokes a picture of the United States as welcoming her with open arms—void of the political context of the involvement of the United States in the Vietnam War. She constructs herself as “a stay at home mom” who “does nothing” but watch Glenn Beck and listen to talk radio. The next two panelists—a father and son from Mexico tell the story of arriving in the United States in 1967 when the father was transferred through his employer—a story of luck, hope, and circumstance, once again, de-historicized. O'Reilly also highlighted a conservative story about one of the primary roles of the Strict Father state, freedom from harm through force:

Well, the federal government has an obligation—the federal government's primary obligation, I think you'll agree with me

on this, is to protect the American people. Protect them from al Qaeda. Protect them from foreign intrusion. This is a foreign intrusion. People walking in there. And they're not just walking in there alone. They're walking in with cocaine and heroin and all kinds of stuff that destroys our society. (O'Reilly, May 26, 2010)

In the weeks following the signing of SB 1070, O'Reilly and Beck both stressed that the bill was necessary to mitigate the harm that the citizens of Arizona are exposed to from those out to “destroy our society.” While the fear tactics were not new, prior to SB 1070 they both framed immigrants as “violent aliens who wreak havoc once they get here” (O'Reilly, December 10, 2009) and Mexico as “burning out of control” (Beck, February 17, 2009). This existing framework was simply superimposed onto the rationale for the passage of SB 1070. Common ways that they both have played on fears in discussions of immigration is to bring in terrorist themes, as above, and to repeat incidents and phrases such as “chaos” numerous times. The incident of choice during the spring and early summer of 2010 was the murder of an Arizona rancher, which was repeatedly mentioned, to the effect of conflating immigrants with murderers.

The freedom from harm via State force is closely allied with the function of the State to provide security to the “children” yet there are limits as security is contextualized as physical security, the State cannot overstep its bounds or this would be construed as coercive by conservatives. Moral “children,” in this case immigrants who have “done it right” (Beck, May 6, 2010) and “followed the rules” and the law-abiding citizens in Arizona have nothing to fear from SB 1070. Those who may be affected by SB 1070, according to the conservative pundits, are already suspected of criminal behavior and criminal behavior is to be punished: “The Arizona law is pretty clear. If you're involved with a police matter first, they have a right to ask what your citizen status is” (O'Reilly, June 10, 2010). According to Beck, “we're turning into a group of people where people who break the law are now the victims” (April 27, 2010), which leads O'Reilly, Beck, and Hannity to use the “we're not racist” tactic—“It is a protection issue. It has nothing to do with race. If millions of Polish people were pouring in here, I believe the stats would be the same” (O'Reilly, July 09, 2010). In a similar attempt to move away from the racial profiling accusations, Beck states—“I don't care if you're Sven from Sweden,” (April 27, 2010), both positing that race/ethnicity is not at issue, it is a simple case of freedom from harm, freedom through physical security, and abiding by the rule of law. Sean Hannity similarly defended his support for SB 1070:

It's being portrayed, you know, people are saying this is the equivalent of Jim Crow, and they're comparing it to Nazism. All this law says is if the police pull you over, you have the right and duty by law to check their immigration status. (Hannity, April 27, 2010)

In sharp contrast to the strict father model, Maddow and Olbermann, contextualized SB 1070 as the “papers please” legislation, repeating this phrase consistently. This framing of the legislation requires the State, as nurturing parent, to protect people from harms that SB 1070 will levy. Progressives see harm as coming in many forms; the harm that is identified in this case is racial profiling:

This is the fundamental problem with the Arizona law. Its proponents insist that race will not be the reason people are stopped and forced to show their papers. They insist it won't be racial profiling, that race won't be the grounds on which people are stopped by police. But they can't say what will be the grounds on which people are stopped by police. (Maddow, April 28, 2010)

In addition, Maddow criticized SB 1070 on the same grounds she criticized the so-called grassroots town hall fervor over the health care debates, with facts. On her show, Maddow indicates that some of the architects of the legislation have deep roots in racist thinking, further substantiating the platform of SB 1070 as racist and harmful. She illustrates this by quoting John Tanton, founder of an organization called Federation for American Immigration Reform (FAIR) that helped Arizona's immigration bill pass:

Mr. Tanton wrote this, quote, “To govern is to populate. Will the present majority peaceably hand over its political power to a group that is simply more fertile? As Whites see their power and control over their lives declining, will they simply go quietly into the night or will there be an explosion?” That's FAIR, who helped write Arizona's anti-immigrant law. (Maddow, April 26, 2010)

As the date of potential implementation of SB 1070 came closer, Olbermann continued to highlight the issue of racism while also including another aspect of freedom from harm—harm that comes from creating unsubstantiated fears:

Our runner up, Governor Jan Brewer of Arizona, caught in a flat-footed lie. Last week, her anti-Latino hysteria reached fever pitch when she said, quote, “we cannot afford all this illegal immigration and everything that comes with it, everything from the crime to the drugs and the kidnappings and the extortion and the beheadings.” (Olbermann, July 2, 2010)

Keeping alive the concerns regarding the racism inherent in SB 1070, Olbermann also connects SB 1070 to building a climate of “hysteria and racism and xenophobia” (July 9, 2010) and also reports on “copy cat” legislation in Utah and the activities of an “anonymous vigilante group” that sent names, social security numbers, and addresses of “an alleged 1,300 illegal immigrants living in their state,” with almost all of the names of “Hispanic origin” (July 14, 2010). In addition to pointing out the racialized nature of the information released by this group to the news media, Olbermann dedicates a portion of his broadcast to speak with a local Latino activist and radio show host

about the potential impact of this information related to individuals' safety and potential disclosure of personal information by state agencies. He commends the governor of Utah for “ask(ing) state agencies to investigate if the state's government allowed private information to be released improperly and to contribute to this list, either inadvertently or in some sort of direct form” (July 14, 2010). This intersection of issues of racism and privacy can be seen as a complex progressive conceptualization of protection from harm—both in the form of racist actions and legislation and in the form of abuses of power and invasions of privacy.

Interestingly, while FOX news was busy aligning SB 1070 with the State duty to protect the “children” from harm with force (police and otherwise), Maddow also suggested that there were some glaring contradictions in the conservative agenda to dismantle “big government” (i.e., freedom from intrusion) and SB 1070:

Talk about big government, oh, boy. So far, though, not a peep from the tea partiers—which is how you get caught for not actually believing what you say you believe. When you are confronted with the big national story that directly speaks to the thing you say you're concerned about—too much government—and you say nothing? It starts to look like maybe your movement is less about your stated principles and more about something else. (Maddow, April 29, 2010)

As summarized in Table 1 (p. 10), FOX and MSNBC hosts differed both in their treatment of ideological opponents and the style in which they delivered political news and analysis. In the transcripts that were analyzed, MSNBC hosts commonly played sound bites from FOX programs in an effort to debunk their claims, however, FOX hosts never acknowledged the MSNBC network nor its hosts. However, the catch phrase “papers please” used by MSNBC hosts to frame the debate over SB1070 did garner a response from FOX host Glen Beck who said, “we are not the show-me-your-papers country” (Beck, April 27, 2010), while O'Reilly and Hannity responded to assertions of racism made by MSNBC hosts and activist groups, but did not acknowledge the source of that frame. Table 1 describes themes that emerged, which are encompassed in several overarching frames. The overarching frames for health care debates can be described as Government as Omnipotent Frame (FOX) versus Government as Safety Net Frame (MSNBC), and Threat to Traditional America Frame (FOX) versus Special Interest Frame (MSNBC). In terms of the immigration debates, the overarching frames were Immigrant as Criminal Frame (FOX) versus Immigrant as Human Frame (MSNBC), and Law and Order Frame (FOX) versus Racial Profiling Frame (MSNBC).

The way in which these frames manifested in terms of the contested definition of “freedom” are outlined in Table 2 (p. 11) where we applied Lakoff's (2006) models to our analysis of the health care and immigration debates by MSNBC and FOX hosts. The contested notion of “freedom” is evident in the conservative strict father model where “freedom” is

Table 1. FOX and MSNBC Framing of Health Care and Immigration Debates.

	FOX hosts	MSNBC hosts
Treatment of opponents	<ul style="list-style-type: none"> Ignore hosts on MSNBC, never acknowledge them by name 	<ul style="list-style-type: none"> Refer to FOX news hosts by name, play sound bites from FOX program hosts
Delivery style	<ul style="list-style-type: none"> Authoritative Confrontational Argumentative Show of emotion and outrage 	<ul style="list-style-type: none"> Sarcastic Humorous Deconstruct issues Debunk claims of Right
Health care	<ul style="list-style-type: none"> Intrusion by the State on individual freedom in the form of mandated health care, takes away individual's choices Government as omnipotent (totalitarian, fascist, communist) President Obama as symbolic "other" worthy of suspicion (a Muslim not born in United States) Universal health care as a threat to traditional America (White, heterosexual, Christian) Tea Party demonstrations against "Obamacare" symbolic of grassroots patriotism and "authentic America" 	<ul style="list-style-type: none"> Intrusion by the State on individual freedom in the form of mandated health care, takes away individual's choices Availability of health care for all citizens viewed as a public good Health care debate about a small elite (big money lobbyists) vs. the welfare of the American people Tea Party opponents are fake grassroots "Astroturf" movement funded and backed by insurance companies Presence of guns at town hall meetings to discuss health care symbolic of violent threat. Groups behind Tea Party demonstrations against "Obamacare" have racist roots
Immigration	<ul style="list-style-type: none"> Illegal immigrants are a foreign "other" that is "polluting" America Illegal immigrants as criminals vs. legal immigrants who did it the "right way" and followed the rules Illegal immigrants stealing "true" Americans' freedoms 	<ul style="list-style-type: none"> SB (Seante Bill) 1070 a violation of personal freedom, a form of racial profiling "Papers Please" legislation violates personal freedom Undocumented immigrants are human beings with family ties

Note. SB = Senate Bill.

understood in individualistic terms, whereas in the progressive Nurturant Parent Model "freedom" is understood in collective terms. In the case of immigration, it involves "direct causation" one agent (illegal immigrant) who freely chooses to break the law. Whereas "systemic causation" employed by progressives involves complex systems that link causal relationships to one another, for example, hundreds of thousands of people of Mexican descent crossing the U.S. boarder being related to larger social, economic, and political systems that have historically shaped labor patterns. In health care debates, conservative causation blames individuals who are solely responsible for their own lot in life. They argue that those who do not work hard, show initiative, or practice healthy habits have no one but themselves to blame for poor health and it is not the job of the "nanny state" to care for them. Whereas, the progressive frame of health care uses systemic causation, which acknowledges the complex ways in which socioeconomic factors impact both health and people's access to health care. It calls upon "protection" and "freedom from harm" as human values.

Discussion

This research highlights how the framing of policy issues calls upon metaphors as well as deep frames in an attempt to

structure people's worldviews. In the case of health care and immigration debates, the data indicate that conservative hosts use emotion, highly charged language, metaphors, and deep frames to garner attention and support, whereas progressive hosts use sarcasm, humor, facts, and deconstruction to show fault in conservative political reasoning. The frames presented in the data analysis are consistent with the contention that "conservatives have learned far better than liberals how to take advantage of the links between emotion and rationality" (Lakoff, 2006, p. 27). This comes through their ability to call upon uncontested frames of various concepts including "freedom."

One common theme found in the data was that MSNBC program hosts spent time contesting frames set forth by conservatives rather than proactively creating their own frames of the health care debates. MSNBC hosts spent time debunking death panels, birther claims, and grassroots origins of Tea Party activists. The frames of the Nurturant Family—freedom from harm and the use of collective resources for the common good did not clearly emerge given the time spent debunking conservatively framed claims about health care reform. The conservative frames of "government as omnipotent"—communist, socialist, fascist, and the frame of health care as a "threat to traditional America" repeatedly cut across FOX host discussions of "Obamacare" and perpetuated fear

Table 2. Lakoff's (2006) Contested Concept of "Freedom" and Framework as Applied to Health Care and Immigration Debates on FOX and MSNBC.

	Conservative strict father model	Progressive nurturant parent model
Health care	<ul style="list-style-type: none"> • Coercion: Freedom from coercion by the State which mandates its citizens to purchase health insurance coverage • Harm: Social programs such as "Obamacare" harm people because it makes them dependent on government • Responsibility for freedom: Freedom is the responsibility of the individual. Government health insurance is inefficient, bureaucratic, and wasteful. You can make better decisions about how to spend your money than the government 	<ul style="list-style-type: none"> • Protection: Protection is a human value and includes consumer protection (protection from private insurance companies and the pharmaceutical industry) as well as safety nets (Medicare, Medicaid, etc.). Protection is necessary to preserve freedom • Harm: Social programs (Medicare, Medicaid, government health care) provide protection from harm of poverty, unemployment, disability, etc. • Responsibility for freedom: Freedom is maximized when members of society take responsibility for the freedom of others. It includes freedom from harm, disease, and illness. Freedom is lost when health insurance companies, driven by profit, are not accountable to the health and well-being of the public
Immigration	<ul style="list-style-type: none"> • Security: The only legitimate role of government is to protect us from harm by others (including illegal immigrants) • Rule of Law: The State (as represented by Homeland Security, Boarder Control, Police) corresponds to the "Strict Father" who holds moral authority over the children (illegal immigrants). The State (Father) teaches morality by punishing the children (illegal immigrants) for what they have done wrong. The child (illegal immigrant) has the freedom to obey or disobey • Harm: Freedom from harm (illegal immigrants who commit crimes) is gained through force—Military, police, and your own guns • Justice: Justice is retribution for wrongdoing. Criminals (illegal immigrants) have forfeited their right to freedom • Rights: We have a right and duty to protect ourselves and our families. The right to bear arms and patrol our own borders as citizens 	<ul style="list-style-type: none"> • Freedom and opportunity: Freedom doesn't exist or is extremely diminished without opportunity Undocumented immigrants contribute to our society and economy and deserve the freedoms and opportunities that go along with being a community member • Community: A nurturant community requires cooperation, trust, honesty, and openness. Rather than view undocumented immigrants as the criminal "other," they should be viewed as human beings with family and community ties • Rights: Empathy and responsibility lead us to care about the rights and freedom of all others. Basic human rights of undocumented immigrants are understood within the larger social and economic context of globalization and economic survival

of government. However, the overarching "racial profiling frame" represented by the catch phrase "papers please" that MSNBC hosts and civil rights leaders used in the immigration debate, did seem to take hold as FOX hosts saw fit to address such claims, albeit at the same time dismissing them.

As highlighted by many progressive hosts, there is an apparent incongruence between conservatives' framing of "big government" as intrusive on a number of fronts (taxes, health care, gun control), yet not on other fronts (abortion, immigration, capital punishment). At the same time, it can be argued that this incongruence similarly exists, but in the opposite direction, for progressives on these same political issues. This can directly be traced to the contested meaning of "freedom" in contemporary political discourse, as shaped by the strict father/nurturant parent models.

"Framing" is an interdisciplinary concept that is often accused of being overused and vague in both its meaning and application (Reese, 2007; Scheufele & Tewksbury, 2007; Van Gorp, 2007). Emphasis has been placed on the need to

"clean up the framing paradigm, making it more theoretically respectable and coherent" (Scheufele, 2004, as cited in Reese, 2007, p. 148). While the primary focus of this study is not to re-theorize or make a definitive statement about the concept of "framing," our use of the contested concept "freedom" as an interpretive framework for understanding how cable TV news hosts frame health care and immigration debates, is a useful example of how the concept of framing can be informed through its application to contemporary political debates. In particular, the competing frames that emerged in our study from cable TV hosts results in a dialectic where hosts from different political paradigms draw upon deep frames (based in material culture) that produce inherently contradictory conceptualizations of the concept of "freedom" and its framing in American political discourse. As Van Gorp (2007) argues, the importance of how frames, as part of culture, get embedded in media content and how they work is useful for understanding how framing can serve as a bridging concept between cognition and culture.

Historically, social and political movements have used the media to help mobilize, validate, and enlarge the scope of their causes and advance their framing of issues (Gamson & Wolfsfeld, 1993). Today, high profile cable TV news pundits are in competition with social movements in the framing process. At times, these cable TV news pundits reflect and build on the framing processes of social movements, while at other times they are the originators of the frames that then get picked up by other media outlets, politicians, the public, and social movement organizations. While this study was focused on political discourse around SB1070, immigration policy has significantly shifted in the last few years with President Obama taking executive action in 2012 to implement Deferred Action for Childhood Arrivals (DACA), expanding the policy further in 2014, and also implementing Deferred Action for Parents of Americans and lawful permanent residents (DAPA).⁶ The actions on the part of the president were in response to vigorous grassroots organizing by immigrant rights groups. These groups have successfully tapped into the “Nurturant Family” frame focused on family/community ties and the rights/freedoms of others. Ongoing analysis is needed to understand the ascension of this frame and the role that cable news pundits play in embracing or repudiating it.

While existing research primarily uses quantitative methods to examine viewers’ perceptions of content, the frequency of its occurrence, and its influence on viewer opinion, our study focuses specifically on framing processes, which helps us theoretically understand how media outlets and news program hosts tap into and successfully harness metaphor and deep frames in policy debates. Further qualitative research is needed on this topic to gain a more comprehensive understanding of how political frames created by cable hosts are formed and sustained in public discourse and by social movements.

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Notes

1. Arizona Senate Bill 1070 authorized law enforcement to arrest a person without a warrant “if the officer has probable cause to believe that the person has committed any public offense that makes the person removable from the United States.” In 2010, a district court judge blocked the law from going into effect; it then went to the 9th Circuit Court of Appeals, which upheld the previous court ruling. Governor Brewer appealed and the case went to the U.S. Supreme Court in 2011 (*Arizona v. United States*). The court struck down three of the four provisions of SB 1070.
2. In June 2011, Glenn Beck left FOX News. This followed a ratings decline for Beck; however, prior to leaving he still held the highest rated 5:00 p.m. cable news slot. Beck continues to host *The Glenn Beck Show*, a syndicated radio show (Carter & Stelter, 2011).
3. In January 2011, MSNBC did not renew Keith Olbermann’s contract following a suspension of Olbermann in November 2010 for making contributions to three Democratic candidates. The *Countdown With Keith Olbermann* show moved to Current TV in June 2011.
4. Health care reform resulted in the *Patient Protection and Affordable Care Act*, which was signed into law by President Barack Obama on March 23, 2010 followed by the *Health Care and Education Reconciliation Act* which was signed into law on March 30, 2010.
5. Dick Morris is a former advisor to President Bill Clinton. He subsequently became a Republican and frequently appears as a conservative political commentator on various FOX News programs.
6. In February 2015, a district court judge in Texas ordered a temporary injunction blocking expanded Deferred Action for Childhood Arrivals (DACA) and Deferred Action for Parents of Americans and lawful permanent residents (DAPA) policies from going into effect. In June 2016, the U.S. Supreme Court issued a 4-4 decision in *United States v. Texas*, which means that the preliminary injunction stands. The ruling did not affect the original DACA implemented in 2012, only the expanded DACA policy.

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