

Mandatory student fees charged by colleges and universities for the support of student organizations and activities have long been controversial. In *Board of Regents v. Southworth*, the U.S. Supreme Court confirmed that schools have the authority to impose these fees, but the court's reliance on First Amendment forum analysis principles in reaching that conclusion has generated new and difficult legal questions. These issues have added significantly to the complexities of administering student fees programs. This article discusses some of the problems arising since *Southworth*, and suggests that controversies and litigation over student fees are likely to continue.