39 African-American Immersion Schools: Paradoxes of Race and Public Education

KEVIN BROWN

IMMERSION schools provide educators with the opportunity to develop teaching strategies, techniques, and materials that take into account the influence of the dominant American and the African-American cultures on the social environment and understandings of African-Americans. Educators can formulate strategies and teach techniques to African-American students to help them overcome racial obstacles. Immersion schools also provide educators with an opportunity to reduce the cultural conflict between the dominant American culture, which is enshrined in the traditional public education program, and African-American culture. This conflict is a primary reason for the poor performance of African-Americans in public schools.

Since education is an acculturating institution, concern about the influence of culture in determining the appropriate educational techniques and strategies is understandable. Educators are necessarily drawn to the influence of culture on the attitudes, opinions, and experiences of individuals. In contrast, the Supreme Court's interpretation of the Equal Protection Clause requires that government make decisions by abstracting people from the social conditions that influence them. While education requires that culture—as a molder of people—be taken into account, law views individuals as self-made. While our legal system may not be blind to the influence of culture on individuals, it tends to assume that individuals choose to be influenced by their culture. For education, cultural influences are important. For law, they are not.

Because of the interplay between the differing frameworks of law and education, there is no good solution to the legal problem posed by the establishment of immersion schools. Any resolution will lead to a striking paradox. There are three conceivable methods of resolving the legal conflict concerning the establishment of immersion schools. The first is to justify immersion schools by viewing them as racially neutral because they are open to all, while ignoring that they are structured to appeal to African-Americans. This conceptualization produces two para-

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doxes. First, it calls for labeling schools designed for African-Americans as race-neutral. Second, it implies that the impact of culture on individual African-Americans is chosen. The justification for immersion schools, however, rests on the fact that African-Americans are not free to choose the influence which cultural ideology—both dominant and African-American—exerts on their lives.

Second, courts can invalidate immersion schools as violating the Equal Protection Clause. This amounts to a declaration that African-American students experience equal treatment in schools which are not immersion schools. However, education in schools that are not immersion schools remains inadequate because it does not address influences of culture on the social environment created by the dominant culture and the educational experience of African-Americans.

The third resolution would be for courts to uphold the decisions of educators to establish immersion schools because they survive strict scrutiny. In order for this to happen, proponents of the schools must provide compelling justifications for their racially motivated decisions. This will force courts to conclude that the deplorable social and educational conditions of African-Americans in traditional school systems constitute those compelling justifications. However, the use of statistics to support this proposition itself reinforces derogatory beliefs about African-Americans. One motivation for establishing immersion schools is to provide black students with strategies to overcome society's presumption that blacks are incompetent. Yet in order to provide the compelling interest for this kind of education, proponents of immersion schools must attempt to provide a factual basis that works to justify the presumption of black incompetence. This resolution, therefore, reinforces one of the very problems that makes immersion schools necessary.

Comparison of Voluntary Immigrants and Involuntary Minorities

A group's cultural understanding of public education influences both the students' and the communities' attitudes and strategies regarding education. Two historical forces helped shape the cultures of ethnic minority groups in their dominant host society: their initial terms of incorporation into that society and their pattern of adaptive responses to discriminatory treatment by members of the dominant group after their incorporation.[1]

Voluntary immigration to a country with the purpose of searching for a better life provides an ethnic group with a reference point for understanding their economic, social, political, and educational experiences in that country. Voluntary immigrants generally move to their host country hoping for greater economic opportunities and more political freedom than was probable at home. Therefore, they tend to compare their economic, social, political, and educational situations in their host country to what they left behind. Generally, this comparison allows them to develop a positive comparative framework for interpret-

ing their conditions in their host country. Many voluntary immigrants who do not believe they are better off exercise the option of returning to their native land.

Voluntary immigrants also come with their native culture intact. Their cultures have not evolved in response to discrimination experienced in America. As a result, cultural and language differences between voluntary immigrants' native culture and the dominant American culture, as enshrined in public schools, are not oppositional. Voluntary immigrants see the cultural differences between themselves and dominant group members as something they must overcome to achieve their goals for a better life. This goal of finding a better life, after all, is what brought them to their host country originally.

Both voluntary immigrants and involuntary minorities frequently face prejudice and discrimination in American society and public education. When confronted with this discrimination, voluntary immigrants tend to interpret the economic, political, and social barriers they face as temporary. They believe they can overcome these problems in time, with hard work and more education. Voluntary immigrants also tend to interpret prejudice and discrimination in their host country as a result of being foreigners. They view prejudice and discrimination as the price they must pay for the benefits they enjoy. Therefore, they have a greater degree of trust of, or at least acquiescence towards, members of the dominant group and the institutions they control.

This cultural story also influences the view voluntary immigrants have toward public education. By viewing the obstacles they face as flowing from their lack of knowledge about their host country, education becomes an important element in the strategy of getting ahead. Even though voluntary immigrants know that their children may suffer from prejudice and discrimination in public schools, voluntary immigrants tend to view this as a price of the benefit derived from being in the new country. Opportunities for education in the United States also aid this positive educational comparison, as opportunities far exceed those available in their native land.

Voluntary immigrants come to their host country to improve their economic, political, and social conditions. This starkly contrasts with the situation of involuntary minorities who were brought into their present society through slavery, conquest, or colonization. Without the voluntary aspect of their original incorporation, involuntary minorities differ from voluntary immigrants in their perceptions, interpretations, and responses to their situation. Unlike voluntary immigrants, involuntary minorities cannot refer to a native homeland to generate a positive comparative framework for their condition. Instead, they compare themselves to the dominant group. Since the dominant group is generally better off, the comparative framework of involuntary minorities produces a negative interpretation of their condition. Their cultural interpretation leads to resentment. Minorities perceive themselves as victims of institutionalized discrimination perpetuated against them by dominant group members. As a result, involuntary minorities distrust members of the dominant group and the institutions they control.

Involuntary minorities respond to prejudice and discrimination differently from the way voluntary immigrants do. Involuntary minorities are not in the position of being able to understand prejudice or discrimination as a result of their status as foreigners. In their view, the prejudice and discrimination they experience in society and school relate to their history as members of a victimized group. Unlike immigrants, involuntary minorities do not view their current condition as temporary.

Cultural differences between involuntary minorities and the dominant group also arise after the former becomes an involuntary minority. Recall that the Africans brought to America came from a collection of diverse cultural groups. These culturally diverse groups forged much of their unifying culture within America itself. In order to live with subordination, involuntary minorities developed coping mechanisms. These responses are often perceived as oppositional to those of the dominant group. The historical interactions of blacks and whites in this country have led to an oppositional character in the cultures of the two races.[2] Many elements of the African-American culture started out as responses to conditions of oppression and subordination. The African-American culture is more at odds with the dominant American culture enshrined in public schools than the native culture brought to this country by voluntary immigrants.

Cultural differences also function as boundary-maintaining mechanisms which differentiate involuntary minorities from their oppressors, namely, dominant group members. These cultural differences give involuntary minorities a sense of social identity and self-worth. Adopting the cultural frame of reference of the dominant group can be threatening to the involuntary minority's identity and security, as well as the group's solidarity. As a result, involuntary minorities are less likely to interpret differences between them and dominant group members as differences to overcome; rather, they are differences of identity to be maintained.

Thus, involuntary minority students often face the dilemma of choosing between academic success and maintaining their minority cultural identity. Furthermore, there is a fear that, even if they did act like members of the dominant group, involuntary minority students still might not gain acceptance. This could result in the worst of all possible situations: losing the support of the minority group and not gaining acceptance by the dominant group.

Cultural Conflict Between African-American Culture and Public School Culture

This reference to African-American culture does not presuppose that African-American culture is somehow better or worse than dominant American culture, only that it is different. Nor does this reference to culture rest upon the idea that all African-American school children share an undifferentiated black culture. Certainly there are geographic, religion, class, color, and gender

variations that affect the attitudes and behaviors of individual blacks. Some social scientists argue that the academic problems of African-Americans are attributable to the fact that more are from the lower class or underclass. For these social scientists, a racial-cultural conflict no longer exists.[3] However, research generally shows that at any given socio-economic class level black students, on average, do poorer than their white counterparts.[4] Race appears to exert its own unique influence on the school experiences and outcomes of black children unexplainable by other socio-economic factors.[5]

Even though individual minority members may react very differently to their individual educational situation, ethnic groups are able to develop a cultural response that influences the collective interpretation of the group's educational experience. This cultural interpretation influences the overall success of members of their community in public schools. A number of educational researchers have examined how cultural misunderstandings between teachers and students result in conflict, distrust, hostility, and school failure for many African-American students.[6] Some of these misunderstandings stem from black students' perceptions that certain behaviors and understandings are characteristic of white Americans, and hence inappropriate for them.[7] Further, teachers and administrators generally are reluctant to discuss race and race-related issues. The color-blind philosophy of educators is, in part, linked to uneasiness in discussing race, lack of knowledge of the African-American culture, and fears that open consideration of differences might incite racial discord.

My reaction to reading *Huck Finn* in my junior literature class illustrates the racial cultural conflict.[8] As a middle-class black child, whose parents both possessed master's degrees in education from Indiana University, I shared much in common with my white teachers and classmates. Nevertheless, a racial cultural conflict existed between my interpretation of our class reading *Huck Finn* and the interpretation of my English literature teacher. My teacher and I were both interpreting *Huckleberry Finn*, but we were interpreting it from the understanding of radically different cultures. Use of the word "nigger" by whites is offensive to African-Americans, even if written in a so-called "literary classic." Understanding *The Adventures of Huckleberry Finn* from an African-American cultural perspective led me to believe that it was not a literary classic, but rather an offensive and racist book. Consequently, the interpretation of my teacher's requirement that the class read the book, especially out loud, was that the exercise was insulting and degrading to all African-Americans, including me.[9] My objecting to the reading of *Huckleberry Finn* was, therefore, a rebellion against an act of racial subordination. My teacher, however, was perceiving my actions from a completely different set of cultural ideas. Rather than viewing her actions as insulting, she saw my actions as both biased and asking for "special treatment" because I was interjecting race into what she understood as a racially neutral situation (i.e., reading a classic literary book).

The cultural experience and the interpretation of traditional education in public schools by involuntary minorities [are] different from [those] of voluntary

immigrants. Ignoring or undervaluing the culture of involuntary minorities is likely to have far more negative consequences for their education than for voluntary immigrant groups. One researcher, for example, examined the performance of high achieving African-American students. She noted that they were forced to develop a raceless persona to succeed in the public schools.[10]

Proponents of immersion schools reject the assumption that the traditional assimilationist education is either value-neutral or embodies the appropriate education for African-Americans.[11] Traditional education programs fail to take into account both the unique social environment of African-Americans created by the dominant culture and the influence of African-American culture on the educational experience of blacks. As a result, traditional educational programs, even when formally denominated multicultural, incorporate the Anglo-American cultural bias of our society.

Proponents of immersion schools often cite the negative educational statistics of African-Americans. The Detroit School Board, for example, argued that the need for male academies was due, in part, to the failure of the traditional coeducational program.[12] The school board pointed to statistics which show the poor academic performance of African-American males and their high dropout rates.[13] These statistics documented the failure of the traditional educational program. Many of those who objected to the exclusion of females from these academies did so because they felt that the condition of African-American females within educational institutions was just as deplorable as that of the males.[14]

Poor educational performance among African-Americans results from an improperly designed structure of education. Proponents cite statistics to demonstrate the educational crisis of African-Americans, not to demonstrate the inabilities of African-Americans. These statistics focus on the flawed nature of the traditional educational approach as it is applied to African-Americans. That flawed approach results in African-Americans shaping themselves to fit within the negative expectations that flow from the dominant social construction of African-Americans.[15] As a result, traditional public education is not the solution to the racial obstacles African-Americans encounter. Rather, it is one of those obstacles.

In a sense, immersion schools represent a traditional approach by African-Americans to make education in racially separate schools more responsive to the needs and interests of African-American students.[16] Immersion schools have their roots in the long-standing debate regarding separate versus integrated education for African-Americans. This debate has a history that is two centuries old. It is part of a much larger debate about the general social, political, and economic condition of blacks in this country. The issue of whether the educational interests of black children are better served in separate institutions, as opposed to racially mixed schools, was first addressed by the black community of Boston, Massachusetts, in the 1780s and 1790s. This debate also flared up in some of the state constitutional conventions after the Civil War and during the discussions of the Blair Education Bill in the 1880s.

While the threads of the debate about immersion schools are traceable to ear-

lier times, the place in which to begin this most recent chapter is a special issue of *Ebony* magazine, published in August 1983. The issue introduced the African-American community to Walter Leavy's provocative question: Is the black male an endangered species?[17] To emphasize the deteriorating condition of the African-American male, Leavy pointed to the homicide rates, the high rates of imprisonment, an increase in the rate of suicide, the infant mortality rate, and a decrease in life expectancy. The crisis of the African-American male was brought to the attention of mainstream America with proposals by a few public school systems to establish African-American male classrooms or academies. These proposals have raised one of the most controversial educational issues of the 1990s. Proposals for such education surfaced in a number of cities, including Miami, Baltimore, Detroit, Milwaukee, and New York.

The legality of race- and gender-segregated schools limited to African-American males, however, is open to serious questions.[18] The Ujamaa Institute, an immersion school in New York City that opened in September 1992, is coeducational. The Milwaukee School System, on advice of counsel, abandoned its original proposal to establish an all-black male school and instead established immersion schools that include females. In *Garrett v. Board of Education*,[19] a federal district court in August 1991 granted a preliminary injunction against the Detroit School Board's proposal for male academies. The American Civil Liberties Union of Michigan and the National Organization of Women Legal Defense and Education Fund represented the plaintiffs. The plaintiffs ignored the race-based decision making that motivated the adoption of proposals for those schools. They only challenged the gender-based exclusion. The district court enjoined the implementation of the male academies, concluding that the Detroit plan would violate state law as well as Title IX, the Equal Educational Opportunities Act, and the Fourteenth Amendment.[20]

New York, Detroit, and Milwaukee have, however, gone forward and now operate schools with a focus on the culture and heritage of African-Americans. Enrollment at these schools is formally open to anyone in the respective school system who wishes to apply. Immersion schools experiment with creative teaching techniques directed toward the learning and socialization styles of African-Americans. These schools also provide special mentoring and tutoring programs for students and faculty development programs for teachers.

Educators may be in the process of reshaping and redefining public education to fit the specific social environmental needs of African-American children. In the past, a number of African-American scholars have argued that black children are systematically miseducated in the traditional educational program. Educational initiatives in immersion schools may represent the beginning of an effort to address the inappropriateness of the traditional education program when applied to African-Americans. This deficiency flows from an improper conceptualization of the educational needs of African-Americans. The traditional educational program that purports to be value-neutral may actually be detrimental to the educational interest of many African-Americans.

The experimental programs that immersion schools employ are attempts to reduce the cultural conflicts existing between their African-American students and the dominant American culture enshrined in the traditional educational program. If successful, immersion schools could redefine the African-American cultural interpretation of the educational experience. Additionally, immersion schools allow educators the opportunity to teach strategies to help African-Americans deal with the ever present hassle of being black.

The Significance of Immersion Schools

The dominating logic which motivated educational reform for African-Americans in the 1960s, 1970s, and early 1980s originated during a time when both legal and political forces in America were attempting to desegregate public education. With the termination of school desegregation decrees, the pro-integrationist policies of the school desegregation era will likely become relics of an increasingly distant past. Many educators will begin to approach African-American educational issues with the realization that racial separation in public schools and American society is here to stay. For education officials, the reform logic behind the desegregation era could become passé. The acceptance of long-term segregation in public schools may exert a tremendous influence on educational reform for African-Americans. The desire to develop standardized educational programs across racial and ethnic lines, including multicultural programs, could become anachronistic. This will inexorably lead to more attempts to redesign the education of African-American youth.

Purpose of Afrocentric Curriculum

The incorporation of Afrocentric curricular materials into the educational process is one of the primary strategies immersion schools employ to accomplish their goals. The use of Afrocentric curricular materials in urban school systems is on the rise. School systems in Atlanta, Detroit, Indianapolis, New Orleans, Portland, and Washington, D.C., have approved their use.[21]

An Afrocentric curriculum is an emerging educational concept and educators will determine what passes as truly Afrocentric over the course of time. In general, an Afrocentric curriculum teaches basic courses by using Africa and the socio-historical experience of Africans and African-Americans as its reference points. An Afrocentric story places Africans and African-Americans at the center of the analysis. It treats them as the subject rather than the object of the discussion. However, this perspective is not a celebration of black pigmentation. An Afrocentric perspective does not glorify everything blacks have done. It evaluates, explains, and analyzes the actions of individuals and groups with a common yardstick, the liberation and enhancement of the lives of Africans and African-Americans.

An Afrocentric curriculum provides black students with an opportunity to study concepts, history, and the world from a perspective that places them at the center. Such a curriculum infuses these materials into the relevant content of various subjects, including language arts, mathematics, science, social studies, art, and music. Students are provided with both instruction in the relevant subject and a holistic and thematic awareness of the history, culture, and contributions of people of African descent. For example, from an Afrocentric perspective the focal point of civilization is the ancient Egyptian civilization (known as "Kemet" or "Said") as opposed to ancient Greece. Therefore, Egypt, not Greece, is the origin of basic concepts of math and science. This is done to show African-American students that they can maintain their cultural identity and still succeed in their studies.

Nowhere is the implication of Afrocentric education more profound and more controversial than in the context of American history. From an Afrocentric perspective, American history is a tale about the historic struggle of blacks against the racial oppression and subjugation of Africans and their descendants. The presentation of American history from an Afrocentric, rather than an Anglocentric, perspective leads to different conclusions about the heritage of African-Americans within the United States. A brief look at the slavery experiences of African-Americans illustrates the difference and illuminates the educational strategies behind such a presentation.

From the Afrocentric perspective, the focus on slavery centers around what African-Americans and their ancestors did to resist the institution of slavery. What is important about captivity (slavery) was the struggle by the captives (slaves) against their oppressors. It is important to note that the captives did not sink into helplessness, apathy, and demoralization, rather, they struggled to survive, both spiritually and physically. Thus, while unable successfully to challenge the system of captivity frontally, the captives waged a many-sided struggle against their captors. The events that represent this struggle are infinite. There were uncounted rebellions and personal acts of defiance (including suicides) by Africans on ships of captivity during the "Middle Passage." Some of these courageous individuals showed that they would rather die than submit to captivity. There were countless insurgency actions by freedom fighters led by known revolutionary figures such as Jemmy, Nat Turner, Toussaint Louverture, Gabriel Prosser, and Denmark Vesey, along with unknown revolutionary figures. There were countless assassinations and poisonings of the captors by the captives. Major fires set in many American cities, such as Charleston, Albany, Newark, New York, Savannah, and Baltimore, were suspected of being set by blacks intent upon overthrowing the yoke of captivity. There was the work of blacks, such as Harriet Tubman, Elijah Anderson, and John Mason, who assisted others out of the most severe form of captivity—slavery. There were also countless individual acts of self-liberation and protest by the captives, including their refusal to submit to work or performing the work in a haphazard fashion.

An Afrocentric perspective would conceptualize the genesis of the Civil

War as an effort to hold the Union together as opposed to a movement to free the black captives. The massive movement of individual captives to free themselves by heading toward Union army camps when the war broke out forced the Union government to address the issue of their freedom. This perspective would also emphasize that Lincoln's Emancipation Proclamation was more of a military document than a humanitarian one. It excluded from its provisions the "loyal" slave states of Missouri, Kentucky, Delaware, and Maryland, the anti-Confederate West Virginia Territory, and loyal areas in certain other Confederate states. As a consequence, nearly one million black people whose masters were considered loyal to the Union were, theoretically, unaffected by the Proclamation. Their freedom was not legally secured until the Thirteenth Amendment was ratified almost three years later. From an Afrocentric perspective, Lincoln is not the great emancipator of the black captives. Rather, the great emancipators are those African-American ancestors who made freedom their personal responsibility.

The Anglocentric focus on slavery, however, presents the struggle against racial oppression as primarily one orchestrated and waged by abolitionist whites, such as the Quakers, William Garrison, and John Brown with occasional assistance from blacks like Frederick Douglass and Harriet Tubman. This perspective emphasizes twin goals of the Civil War as holding the Union together and eradicating slavery. President Lincoln is seen as leading the charge to reverse years of racial bigotry. The Anglocentric perspective treats the Emancipation Proclamation as both a humanitarian and military necessity. An Anglocentric perspective of slavery converts slaveholders, such as George Washington and Thomas Jefferson, into saviors because of their personal concern with the institution of slavery and their private acts of manumission. In fact, many whites who opposed slavery did so not for what slavery did to blacks but because of its negative impact on the work ethic and morality of whites. Nevertheless, these individuals are considered champions of the interests of slaves.

Presenting the story of slavery from an Afrocentric point of view shows African-Americans that they are descendants of over seventeen generations of people who struggled against racial subordination in America. It demonstrates graphically to African-American youth that they must take charge of their own liberation. It is only when blacks commit themselves to this task that their condition will improve.

The Anglocentric perspective, however, portrays whites as active parties in the abolition of slavery. Their efforts in overcoming the racial bigotry of other whites are praised. The Anglocentric perspective intends to foster feelings of loyalty for the country by showing how America overcame its own atrocities. This perspective portrays blacks as passive and submissive to the racial domination of slavery. Presenting only this view to African-American school children may lead to a sense of disempowerment. This perspective projects the view that, as in the time of slavery, improvements in the conditions of African-Americans must await the beneficence or enlightenment of whites.[22]

Paradoxes Resulting from the Legal Analysis of Immersion Schools

On racial and educational grounds, then, a powerful case can be made for immersion schools. Yet, the abstract, highly individualistic nature of the legal system bodes ill for their future. Each of the three resolutions of the legal conflict involving the establishment of immersion schools will result in a paradox. First, in justifying immersion schools, courts can ignore that immersion schools appeal to African-Americans and view them as racially neutral, since they are open to all. What to some (many, most) would appear to be racially motivated decision making actually would be deemed an educational decision which happens to have a racial overtone. In effect, this would cause immersion schools, designed for African-Americans, to be labelled race-neutral. In addition, such a conceptualization of immersion schools reinforces the notion that the impact of culture on individual African-Americans is primarily a matter of choice because enrollment is a matter of choice. But the justifications for immersion schools flow from a belief that the impact of culture is not a matter of choice. As a result, the primary justifications for the schools evaporate.

Second, courts can invalidate immersion schools from the perspective that they violate the Equal Protection Clause. In an effort to uphold the Equal Protection Clause's requirement of equal treatment, courts would be confining African-Americans to an educational situation that cannot take account of the disparate social environment created for them by the conflicting influences of African-American and dominant Anglo-American cultures. Such a result amounts to a declaration that the public schools treat African-American students equally even though they are receiving an inappropriate education. By forcing African-Americans to remain in educational institutions insensitive to their social environment and the cultural conflicts that exist for them, courts sanction inequality for African-American students through the guise of equality.

The third resolution is for courts to uphold the decision of educators to establish immersion schools because it survives strict scrutiny. Upholding immersion schools for this reason will force proponents to provide reasons that make their race-based decision making compelling. This will require proponents to paint the most negative picture about the plight of African-Americans. The more miserable the condition of African-Americans is portrayed, the better the chances of establishing the compelling interest needed to justify immersion schools. In providing objective evidence about the negative condition of African-Americans, however, proponents legitimate derogatory beliefs about African-Americans. As a result, the need to supply legal justification will force proponents of immersion schools to argue the reasonableness of the social construction of African-Americans in our dominant culture. Since one of the primary justifications for immersion schools is the negative social construction of African-Americans, this solution reinforces the problem which makes the solution necessary.

In short, there is no solution to this problem that will not lead to a paradox.

A paradox is unavoidable because public education is an acculturating institution. Culture necessarily influences the attitudes, opinions, and experiences of individuals in public schools. Law, by contrast, attempts to make decisions by abstracting those decisions from the social conditions that influence them. While education focuses on the impact of culture in molding the person, law focuses on the concept of individuals who choose what and how they want to be. For education, culture is important. For law, it is not. It is the interplay of these different cognitive frameworks that creates the contradiction in any solution to the problem of soundly educating African-Americans.

NOTES

1. John U. Ogbu, *Immigrant and Involuntary Minorities in Comparative Perspectives*, in MINORITY STATUS AND SCHOOLING: A COMPARATIVE STUDY OF IMMIGRANT AND INVOLUNTARY MINORITIES 3, 3–33 (Margaret A. Gibson & John Ogbu eds. 1991).

2. Due to the conflicts between the dominant American cultural heritage and perspective and Afrocentric cultural heritage and perspective, the two cultures cannot be integrated without some personality dislocation. ROBERT STAPLES, INTRODUCTION TO BLACK SOCIOLOGY 68 (1976).

3. Pierre L. VanDen Berghe, *A Review of Minority Education and Caste: The American System in Cross-Cultural Perspective*, 24 COMP. EDUC. REV. 126, 126–30 (1980); George Clement Bond, *Social Economic Status and Educational Achievement: A Review Article*, 12 ANTHROPOLOGY & EDUC. Q. 227–57 (1981).

4. Ogbu, *supra* note 1, at 3, 5–6.

5. John U. Ogbu, *Class Stratification, Racial Stratification, and Schooling*, in CLASS, RACE, AND GENDER IN AMERICAN EDUCATION 164 (L. Weis ed. 1988) (arguing that poor performance of blacks in education is due to racial stratification rather than to class differences).

6. *See, e.g.*, Reuben M. Baron et al., *Social Class, Race, and Teacher Expectations*, in TEACHER EXPECTANCIES 251–69 (Jerome B. Dusek ed. 1985); COMM. ON POLICY FOR RACIAL JUSTICE, VISIONS OF A BETTER WAY: A BLACK APPRAISAL OF PUBLIC SCHOOLING 16–17 (1989) (discussing research revealing that teachers' gross stereotyping as well as their inaccurate, negative, and rigid expectations of black and low-income children form the groundwork for self-fulfilling prophecies of academic failure).

7. Ogbu, *supra* note 1, at 3, 27.

8. Law school academics also can experience cultural conflict in their legal academies. *See, e.g.*, Pierre Schlag, *The Problem of the Subject*, 69 TEX. L. REV. 1627, 1679–83 (1991) (describing the experience of young liberal thinkers in American law schools whose political and cultural maturation was influenced by the Civil Rights movement and the Vietnam War, as well as the counter culture). These individuals found themselves as members of a law faculty and were being groomed to think and act like the very people against whom they were fighting. *Id.*

9. In my high school, students received grades in their classes every six weeks. For the six-week period that preceded reading *Huck Finn*, my grade in Eng-

lish was a "B." For the six-week period that we read *Huck Finn*, it was a "D." During the time the class read *Huck Finn*, an antagonistic relationship developed between my English teacher and me that continued during the remainder of the time I was in her class. Even though my English grade improved to an "A" for the six-week grading period after reading *Huck Finn*, the antagonism in our relationship did not lessen. At the end of the third grading period, my English teacher was given the opportunity to send six of her students to another English class with a different teacher. Needless to say, I was one of those transferred.

10. Signithia Fordham, *Racelessness as a Factor in Black Students' School Success: Pragmatic Strategy or Pyrrhic Victory?*, 58 HARV. EDUC. REV. 54, 55 (1988) (discussing the impact of race on scholarly black students).

11. For a discussion of the philosophy of leading Afrocentric educators on the influence of culture in determining the educational strategies for African-Americans, *see* INFUSION OF AFRICAN AND AFRICAN AMERICAN CONTENT IN THE SCHOOL CURRICULUM: PROCEEDINGS OF THE FIRST NATIONAL CONFERENCE, OCTOBER 1989 (A. G. Hilliard III et al. eds. 1990).

12. Memorandum of Law in Opposition to Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction at 15, Garrett v. Board of Educ., 775 F. Supp. 1004 (E.D. Mich. 1991) (No. 91-73821).

13. *Id.* at 3–4. According to an article in *Newsweek* magazine that discussed the Milwaukee plan for separate schools for African-American males, black men, who account for 6 percent of the U.S. population, represent 46 percent of state prison inmates. Barbara Kantrowitz, *Can the Boys Be Saved?*, NEWSWEEK, Oct. 15, 1990, at 67. In addition, among black men who are in their 20s, 23 percent are incarcerated or on probation or parole. *Id.*

14. *See, e.g.*, Garrett v. Board of Educ., 775 F. Supp. 1004, 1006 (E.D. Mich. 1991).

15. *See* LANGSTON HUGHES, *Theme for English B*, in THE LANGSTON HUGHES READER 108–09 (1958).

16. *See, e.g.*, CARNEGIE COMM'N ON THE FUTURE OF HIGHER EDUC., FROM ISOLATION TO MAINSTREAM: PROBLEMS OF THE COLLEGES FOUNDED FOR NEGROES 11 (1971) (praising historically black colleges for providing educational opportunities for blacks and enhancing the general quality of life of black Americans).

17. Walter Leavy, *Is the Black Male an Endangered Species?*, EBONY, Aug. 1983, at 41. There have been debates and discussions about the survivability and viability of the African-American male. *See generally* BLACK MEN (Lawrence E. Gary ed. 1981); YOUNG, BLACK, AND MALE IN AMERICA: AN ENDANGERED SPECIES (Jewelle Gibbs et al. eds. 1988).

18. The Supreme Court has addressed the issue of gender segregation in both public education and public university education. Mississippi Univ. for Women v. Hogan, 458 U.S. 718 (1982). In *Hogan*, the Court struck down the state's single-sex admission policy for its school of nursing at the Mississippi University for Women. *Id.* at 730. The Court noted that the proffered justification for the exclusion, providing a remedial haven for women from the hierarchy of domination in the man's world of higher education, was unpersuasive. *Id.* at 731. They viewed excluding men from a school of nursing as perpetuating the stereotyped view of nursing as exclusively a woman's job. *Id.* at 729–30.

The issue of gender-segregated education in public schools was addressed by

the Court in Vorchheimer v. School Dist. of Philadelphia, 430 U.S. 703 (1977) (per curiam). An evenly divided Court upheld an otherwise coeducational school system's maintenance of sexually segregated high schools for high academic achievers. *Id.* at 703.

19. 775 F. Supp. 1004 (E.D. Mich. 1991).

20. The district court specifically noted it "[was] not presented with the question of whether the Board can provide separate but equal public school institutions for boys and girls." *Garrett*, 775 F. Supp. at 1006 n.4.

21. *See* Peter Schmidt, *Educators Foresee "Renaissance" in African Studies*, EDUC. WK., Oct. 18, 1989, at 8.

22. Professor Derrick Bell, for example, argues that the Supreme Court's school desegregation cases can be understood as balancing the interests of black rights against white interests and choosing the latter. *See* Derrick Bell, Brown *and the Interest-Convergence Dilemma*, in SHADES OF *BROWN*: NEW PERSPECTIVES ON SCHOOL DESEGREGATION 91, 91–106 (Derrick Bell ed. 1980). *See generally* DERRICK BELL, AND WE ARE NOT SAVED (1987).