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## Sororities as Confederate Monuments

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# SORORITIES AS CONFEDERATE MONUMENTS

*Stephen Clowney\**

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## INTRODUCTION

Around the country, local governments continue to remove Confederate statues from the public square.<sup>2</sup> In the last five years, municipalities in Florida, Kentucky, Louisiana, North Carolina, Tennessee, Texas, and Virginia have all relocated statues that venerate the rebel cause.<sup>3</sup> All of this is heartening; however, somewhat lost in the skirmishes over statuary is the remarkable diversity of the Confederate memorial landscape. Sculptures of Robert E. Lee and Jefferson Davis are far from the only artifacts that transmit the ideals of the Lost Cause. The man-made environment is littered with modest shrines to the glory of antebellum South; hundreds of schools, lakes, bridges, dams, parks, and military bases still honor Confederate war leaders and their ideals.<sup>4</sup>

This paper focuses on one of these overlooked sites of memory—the Southern sorority house.<sup>5</sup> I argue that we should view sorority houses as monuments to the Confederacy. Sororities, this paper argues, do much to advance the legacy of the rebels and amplify Lost Cause nostalgia. As a result, universities have an obligation to reconsider the cardinal role that Greek organizations play in the social structure of campus. Defenders of the sorority system will surely object. They will insist my claim is overwrought and that I am seeing the ghosts of history where none exist. But that is wrong; however well-meaning individual sorority members may be, the landscape created by the American Greek system is not innocent.<sup>6</sup>

Part I of this essay will put flesh to my argument that sorority houses are a type of Confederate memorial. I make two claims. First, sororities have clearly announced their allegiance to the Old South through their architecture. Most sororities have constructed their buildings to mimic the design of antebellum plantations. The white

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<sup>2</sup> Jess Bidgood et al., *Confederate Monuments Are Coming Down Across the United States. Here's a List*, N.Y. TIMES (Aug. 28, 2017), <https://www.nytimes.com/interactive/2017/08/16/us/confederate-monuments-removed.html> [<https://perma.cc/6VYZ-AYBB>]; Katie Zezima & Aaron Williams, *The Battle Over Our Nation's Confederate Remnants*, WASH. POST (Sept. 12, 2017), <https://www.washingtonpost.com/graphics/2017/national/confederate-monuments/> [<https://perma.cc/7FTT-CWX9>]. For more on the legal complications of removing Confederate monuments, see generally Zachary Bray, *Monuments of Folly: How Local Governments Can Challenge Confederate "Statue Statutes"*, 91 TEMP. L. REV. 1 (2018) (discussing conflict between local and state governments in battle over Confederate monuments).

<sup>3</sup> Bidgood et al., *supra* note 2; Alex Horton, *Tennessee Lawmakers Punish Memphis for Removing Statue of Confederate and KKK Leader*, WASH. POST (Apr. 18, 2018), <https://www.washingtonpost.com/news/post-nation/wp/2018/04/18/tennessee-lawmakers-punish-memphis-for-removing-statue-of-confederate-and-kkk-leader/> [<https://perma.cc/455N-JEPE>].

<sup>4</sup> *Whose Heritage? Public Symbols of the Confederacy*, S. POVERTY L. CTR., <https://www.splcenter.org/20190201/whose-heritage-public-symbols-confederacy> [<https://perma.cc/F74N-ZWFU>] (listing the numerous publicly supported spaces that honor the Confederacy).

<sup>5</sup> Why focus on sorority houses and not fraternities? Many of the arguments I'll make in this paper apply to both sororities and fraternities, however, the architecture of the sororities tends to be a more opulent and often more plantation-like. This is largely because sororities have an easier time securing funding and insurance because they do not host parties. Interview with Melissa Harwood-Rom, Dean of Students, University of Arkansas, in Fayetteville, Ark. (Sept. 2019).

<sup>6</sup> For more on how landscapes have the power to exclude, see Sarah Schindler, *Architectural Exclusion: Discrimination and Segregation Through Physical Design of the Built Environment*, 124 YALE L.J. 1934, 1989 (2015) (discussing the way that localities use infrastructure to send exclusionary messages to minority communities). See generally Stephen Clowney, *Landscape Fairness: Removing Discrimination from the Built Environment*, 2013 UTAH L. REV. 1 (2013) (same).

columns, wide porches, and decorative pediments normalize an unthinking romanticism toward the antebellum slave society—a culture that immiserated the South’s black inhabitants. Second, beyond the architecture, the institutions themselves should be regarded as monuments to the Confederacy because they remain profoundly segregated and perpetuate the caste-based racial division of campus. Data gathered for this study will demonstrate that many sororities still have no black members and almost all remain “ethnic enclaves for White students.”<sup>7</sup>

Part II then asks if universities have any legal footing to intervene and disrupt these racialized landscapes. At first glance, it appears that sororities might be able to evade pressure from university administrators. The Greek letter organizations insist that they are private entities not open to the public; therefore, they can choose their own architecture and adopt admission policies that have discriminatory effects. My research on sororities in the Southeastern Conference (SEC), however, reveals that the Greek houses are not independent of the state. Public universities have become intimately involved in the governance of the sororities and fraternities. Almost all large universities have a professionally staffed Office of Greek Life that supports and guides the Greek organizations.<sup>8</sup> More importantly, the overwhelming majority of Greek houses sit on land owned by the university. In some states, the university constructs, owns, and operates the Greek houses. In other jurisdictions, the college rents land to the national Greek organizations. State universities across the country have, in practice, created publicly subsidized neighborhoods of all-white housing.

All of this is problematic. The universities’ entanglement with the fraternities and sororities, however, also offers a point of leverage. An aggressive administrator could, in theory, upend the social ecology of campus by stripping the fraternities and sororities of their standing as official student organizations. To conclude the essay, I offer three slightly more realistic suggestions for reform. These proposals dilute the taint of the Confederacy that hangs over the sororities without wholly undermining the status of the Greek organizations in the SEC schools. Starting immediately, universities should: (1) use their status as landowners to regain control over the sororities’ design decisions; (2) publish yearly diversity statistics for each Greek organization to stimulate an intra-sorority push toward integration; and (3) delay the start of rush until the second semester to give administrators more opportunity to educate women from diverse backgrounds about the benefits of the sororities.

## I. SORORITY HOUSES ARE CONFEDERATE MEMORIALS

Sorority houses remain a familiar feature of the collegiate landscape. They also regularly appear in the background of popular television programs and movies. The prevalence of sorority houses makes it easy to believe that their effects are benign. That view is wrong. Although not quite as explicit as a Confederate statue, the landscape of sorority houses is directly tied to the Lost Cause and Confederate

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<sup>7</sup> Jim Sidanius et al., *Ethnic Enclaves and the Dynamics of Social Identity on the College Campus: The Good, the Bad, and the Ugly*, 87 *J. PERSONALITY & SOC. PSYCHOL.* 96, 100 (2004).

<sup>8</sup> The role of the Office of Greek Life has become so entrenched that fraternity and sorority advisors have their own academic journal. See, e.g., Kate Steiner, *Career Sustaining Factors for Campus-Based Fraternity/Sorority Advising Professionals: A Grounded Theory Study*, *ORACLE*, Winter 2019, at 49, 51.

memorialization. The mansions tell a story—crafted from brick, stone, and steel—that sanitizes the history of the antebellum South, while communicating troubling messages about racial hierarchy.

*A. Sororities are Confederate Monuments Because of Their Architecture*

The clearest proof that we should regard sorority houses as Confederate monuments is in their architecture. Hundreds of sororities, concentrated mainly in the South, have designed their living spaces to resemble grand plantations.<sup>9</sup> The stereotypic antebellum estate is familiar. Plantation homes feature white columns in the classical style, wide porticos, rigid symmetry, decorative pediments, centered entrances, evenly spaced windows with contrasting shutters, and low-pitched roofs.<sup>10</sup> Tara, the fictional estate from *Gone with the Wind*, is emblematic of the style.<sup>11</sup>



*Figure 1: Twelve Oaks, the mansion that inspired Tara<sup>12</sup>*

<sup>9</sup> See Lydia Mattice Brandt, *Race and Privilege in the Midcentury Fraternity House: The University of Alabama I* (Oct. 3, 2019) (unpublished manuscript) (on file with author) (discussing that all the Greek housing at Alabama was built with white columns).

<sup>10</sup> See James C. Bonner, *Plantation Architecture of the Lower South on the Eve of the Civil War*, 11 J. S. HIST. 370, 370 (1945) (“Southern plantation architecture, in the popular mind, carries the connotation of a massive structure, adorned with a portico of stately columns of classic design . . .”); Terrence W. Epperson, *Race and the Disciplines of the Plantation*, 24 HIST. ARCHAEOLOGY, no. 4, 1990, at 29, 31–32 (arguing that plantation architecture was part of the larger system of control of black slaves); Wilbur Zelinsky, *The Greek Revival House in Georgia*, J. SOC’Y ARCHITECTURAL HISTORIANS, May 1954, at 9, 9–10 (describing the imagined southern mansion as having a broad portico, pediment, a large central hallway, low-pitched roof, shuttered windows, and columns).

<sup>11</sup> For more on the symbolic role of *Gone with the Wind*, see generally CATHERINE CLINTON, *TARA REVISITED: WOMEN, WAR, & THE PLANTATION LEGEND* (Constance Herndon ed., 1995).

<sup>12</sup> Julie Pennell, *The Mansion That Inspired ‘Gone with the Wind’ is for Sale — See Inside!*, TODAY (July 8, 2019, 4:43 PM), <https://www.today.com/home/gone-wind-mansion-sale-see-inside-t157857> [<https://perma.cc/5AZB-M6UY>].

Today, almost every sorority house in the SEC employs some Tara-inspired design tropes. Delta Gamma at Mississippi State has white columns, contrasting shutters, and a portico.<sup>13</sup> Kappa Kappa Gamma at Arkansas boasts white columns, rigid symmetry, contrasting shutters, and a center entrance.<sup>14</sup> Pi Beta Phi at Alabama has white columns, a decorative pediment, a low-pitched roof, and evenly spaced windows.<sup>15</sup> Gamma Phi Beta at the University of Georgia built white columns, a center entrance, and a low-pitched roof.<sup>16</sup> There are many, many more examples in the SEC alone. Architectural historian Lydia Brandt has argued that the forty fraternity and sorority houses constructed during the University of Alabama's first Greek construction boom "all referenced antebellum plantation architecture."<sup>17</sup>

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<sup>13</sup> See Delta Gamma- Mississippi State University, FACEBOOK (Aug. 3, 2019), <https://www.facebook.com/387836231958870/photos/a.388943051848188/512843782791447/?type=3&theater> [https://perma.cc/VGH3-N4ZE].

<sup>14</sup> See Kappa Kappa Gamma | Arkansas, FACEBOOK (June 23, 2011), <https://www.facebook.com/KKGarkansas/photos/a.196761643708723/196765163708371/?type=3&theater> [https://perma.cc/Q6PM-ME2M].

<sup>15</sup> See Pi Beta Phi University of Alabama, FACEBOOK (Dec. 5, 2017), <https://www.facebook.com/alabamapibetaphi/photos/pcb.1543854759000970/1543853652334414/?type=3&theater> [https://perma.cc/6R95-XESS].

<sup>16</sup> See Gamma Phi Beta at UGA, FACEBOOK (July 2, 2018), <https://www.facebook.com/ugagammaphi/photos/a.381026115254211/1861197443903730/?type=1&theater> [https://perma.cc/AZ2P-KURL].

<sup>17</sup> Brandt, *supra* note 9 (manuscript at 3).

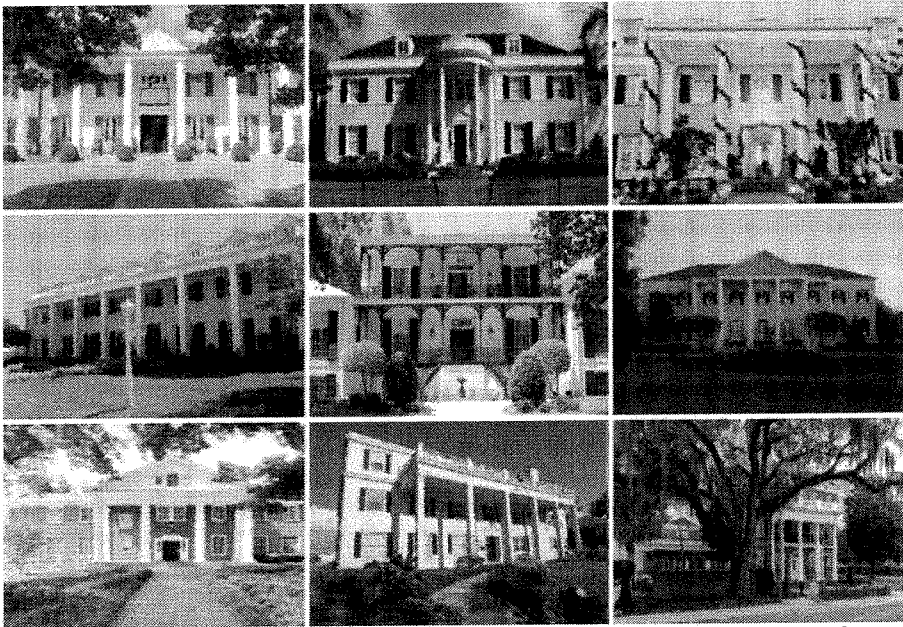


Figure 2: Sororities of the SEC (left to right, top to bottom): Kappa Kappa Gamma (MS),<sup>18</sup> Phi Mu (AL),<sup>19</sup> Kappa Delta (AR),<sup>20</sup> Zeta Tau Alpha (AR),<sup>21</sup> Phi Mu (GA),<sup>22</sup> Delta Gamma (MSU),<sup>23</sup> Chi Omega (AR),<sup>24</sup> Alpha Phi (MO),<sup>25</sup> Delta Gamma (FL)<sup>26</sup>

<sup>18</sup> *The 22 Most Stunning Sorority Houses in America: 21 of 22*, YAHOO NEWS (Apr. 10, 2018), <https://www.yahoo.com/news/22-most-stunning-sorority-houses-233000579/photo-p-kappa-kappa-gamma-house-photo-233212217.html>.

<sup>19</sup> *Phi Mu, University of Alabama*, WAR CONSTRUCTION, <http://www.warconstruction.com/portfolio/phi-mu/> (last visited May 13, 2020) [https://perma.cc/ZR9K-3QN4].

<sup>20</sup> Sam Feher, *The 50 Most Stunning Sorority Houses in America: 28 of 50*, COSMOPOLITAN (Apr. 10, 2018), <https://www.cosmopolitan.com/lifestyle/g19725690/the-40-most-stunning-sorority-houses-in-america/?slide=28> [https://perma.cc/TZ2X-3UHS].

<sup>21</sup> *The 22 Most Stunning Sorority Houses in America: 3 of 22*, YAHOO NEWS (Apr. 10, 2018), <https://www.yahoo.com/news/22-most-stunning-sorority-houses-233000579/photo-p-gorgeous-recently-renovated-house-photo-233212219.html> [https://perma.cc/7LNT-V6UC].

<sup>22</sup> *Phi Mu Content Page*, U. GA.: GREEK LIFE, [https://greeklife.uga.edu/content\\_page/phi-mu-content-page](https://greeklife.uga.edu/content_page/phi-mu-content-page) (last visited May 13, 2020) [https://perma.cc/44WG-5JT3].

<sup>23</sup> *'Tis the Season at the Delta Gamma House*, DELTAGAMMAMSU'S BLOG (Nov. 9, 2010), <https://deltagammamsu.wordpress.com/2010/11/09/tis-the-season-at-the-delta-gamma-house/> [https://perma.cc/6QM7-FEEK].

<sup>24</sup> *Chi Omega - University of Arkansas*, FACEBOOK (Jan. 20, 2019), <https://www.facebook.com/114890791998905/photos/sweet-home-chi-omega/1248072728680700/> [https://perma.cc/XEN7-FJ4P].

<sup>25</sup> Sarah Brown, *Sororities Say They, Too, Have a Key Role to Play in Preventing Sexual Assault*, CHRON. OF HIGHER EDUC. (June 19, 2015), <https://www.chronicle.com/article/Sororities-Say-They-Too-Have/231005> [https://perma.cc/ND3F-HWHW].

<sup>26</sup> Jenna Sims, *Step Inside This Brand-New Sorority House at the University of Florida: 1 of 7*, SOUTHERN LIVING, <https://www.southernliving.com/culture/school/uf-delta-gamma-house-tour?slide=b178fe65-5cdf-4ab9-b615-92ed9b9afab8#b178fe65-5cdf-4ab9-b615-92ed9b9afab8> (last visited May 13, 2020) [https://perma.cc/4EBF-WHNV].

Some commentators will surely deny that collegiate sororities resemble plantation homes or insist that any similarity is inadvertent. The sorority houses, they will argue, do not really mimic slaveholders' estates. Rather, their architects have innocently employed a smattering of design elements common to the Greek Revival style—a style that inspired some Southern planters. According to these critics, vilifying the sorority houses would politicize an entire architectural tradition and make it more difficult to construct timelessly elegant buildings.

The argument that the sororities' appearance amounts to some unplanned quirk asks us to deny what our eyes clearly see. The likeness between the imagined plantation landscape and the modern sorority is so striking and so consistent that it cannot have occurred by accident. Giant columns and breezy porches don't spring from the ground haphazardly, like mushrooms after a rain. Additionally, the repetition of a very specific set of design elements—across state lines and among many different Greek organizations—indicates that the sororities have acted with purpose; they intend their homes to resemble antebellum plantations.

The sororities themselves confirm this obvious fact. The architects for the Greek organizations have repeatedly admitted that the “traditional southern estate” inspired their design choices.<sup>27</sup> At the University of Arkansas, during a presentation to the campus community, architects for the Phi Mu sorority showed slides of the Southern plantations that influenced their blueprints.<sup>28</sup> This isn't a singular example. Other sorority builders have admitted to finding inspiration in “proud Southern architecture[.]”<sup>29</sup> “southern Greek revival typolog[y,]”<sup>30</sup> and “design[s] [that] harkens back to the Antebellum architecture of the South.”<sup>31</sup> For these architects, it seems that the “[w]ell-proportioned facades and colonnaded porches”<sup>32</sup> of the plantation homes have become a visual shortcut for grandeur and elegance.

Design decisions like these have meaning. The judgments an organization makes as it places structures on the land reveal its tastes, values, and hopes in a highly public forum. In particular, “the decision to erect a war memorial at the heart of the National Mall, rather than, say, a monument to an artist or writer, imparts a particular message about our social world; as a nation, we value wartime sacrifice and believe the work

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<sup>27</sup> Core Architects PowerPoint Presentation to University of Arkansas Design Review Board (June 21, 2016) (on file with author).

<sup>28</sup> *Id.* Notably, the architects showed a picture of the “Wynn House,” the former home of Hines Holt, one of the largest slave owners in Central Georgia. For more information on the Wynn House, see J. Craig Cotton, “*There Were Giants in Those Days: Elite Lawyers in Columbus, Georgia, 1840–1870*,” 8 *MUSCOGIANA* 24, 25 (1997). Other sororities aren't quite so explicit about their inspirations. They often say that they intend to build in the classical style. See *Phi Mu Sorority University of Kentucky*, SHERMAN CARTER BARNHART ARCHITECTS, <https://www.scbarchitects.com/projects/phi-mu-sorority-greek-housing/> [<https://perma.cc/Y2PT-TUPV>] (calling the design “classically inspired”).

<sup>29</sup> *Alpha Delta Pi Sorority House (University of Mississippi)*, TREANORHL, <https://www.treanorhl.com/design/project/alpha-delta-pi-university-mississippi> [<https://perma.cc/X3PV-A35Z>].

<sup>30</sup> Meeting Minutes of University of Arkansas Design Review Board (Oct. 28, 2013) (on file with author).

<sup>31</sup> *Alpha Delta Pi Sorority House (University of Mississippi)*, *supra* note 29.

<sup>32</sup> Core Architects PowerPoint Presentation to University of Arkansas Design Review Board, *supra* note 27.



of soldiers merits special remembrance.”<sup>33</sup> The landscape, in effect, becomes our “unwitting autobiography[.]”<sup>34</sup>

When Greek organizations erect residences shaped like plantations, that, too, creates structures of meaning. In this case, the design of the sorority buildings conveys at least two pernicious ideas. First and foremost, sorority houses that resemble Southern plantations send a message that African American women are not truly welcome in the social hub of university life. Imagine being a black freshman, newly arrived on campus, and seeing block after block of buildings that mimic slaveholders’ estates. The architecture of the sorority homes communicates an easily intelligible narrative that Greek life is not built for the enjoyment of black people and that black history merits little consideration.<sup>35</sup> Consider, a university would never ask Jewish students to reside in a dorm that borrows architecture from a concentration camp. And yet, that’s exactly the kind of thing sororities demand of African American women.<sup>36</sup>

The design of the sororities has another pernicious effect; it engrains a fictional, romanticized understanding of Southern history. In the aftermath of the Civil War, Southern writers attempted to rehabilitate the image the Confederacy with a sweeping propaganda campaign.<sup>37</sup> Novels, memoirs, and movie scripts all portrayed the antebellum South as a lost Shangri-La—an agrarian paradise full of fragrant magnolias, leisurely balls, and lavish estates.<sup>38</sup> The plantation-inspired sorority

<sup>33</sup> Clowney, *supra* note 6, at 4.

<sup>34</sup> Peirce F. Lewis, *Axioms for Reading the Landscape: Some Guides to the American Scene*, in *THE INTERPRETATION OF ORDINARY LANDSCAPES: GEOGRAPHICAL ESSAYS* 13 (D. W. Meinig ed., 1979) (arguing that all human landscapes have meaning).

<sup>35</sup> A similar argument has recently been made by black Americans who find weddings located on plantation grounds distasteful. See, e.g., Heather Murphy, *Pinterest and the Knot Pledge to Stop Promoting Plantation Weddings*, N.Y. TIMES (Dec. 5, 2019), <https://www.nytimes.com/2019/12/05/style/plantation-weddings-pinterest-knot-zola.html> [<https://perma.cc/BYK5-E7UT>]; Patricia J. Williams, *Stop Getting Married on Plantations*, NATION (Sept. 26, 2019), <https://www.thenation.com/article/archive/plantation-wedding-slavery> [<https://perma.cc/3EEY-PJMU>] (“We hate the traces of slavery; no matter their innocence, the symbols summon pain.”).

<sup>36</sup> Those who defend the Greek system will, of course, take issue with any claim that sororities discriminate against African Americans. The potential line of attack is easy to spot. Skeptics will argue that the design of Greek housing is too subtle to create exclusionary meanings. Do the white columns really drive away any potential pledges? Data on this point is elusive. However, the sororities themselves have long had faith in the power of architecture to exclude. According to historian Lydia Brandt, Greek organizations in the 1960s first adopted their plantation-like designs to communicate a message that “antebellum racial and social hierarchies [would] persist,” even as campuses became more diverse. Brandt, *supra* note 9 (manuscript at 2). For these sororities and fraternities, the architecture of their buildings has long functioned as one part of a larger plan to preserve segregated spaces.

<sup>37</sup> The Lost Cause ideology and mythmaking has been extensively documented by historians. See generally DAVID W. BLIGHT, *RACE AND REUNION: THE CIVIL WAR IN AMERICAN MEMORY* (2001); GAINES M. FOSTER, *GHOSTS OF THE CONFEDERACY: DEFEAT, THE LOST CAUSE, AND THE EMERGENCE OF THE NEW SOUTH, 1865 TO 1913* (1987); CHARLES REAGAN WILSON, *BAPTIZED IN BLOOD: THE RELIGION OF THE LOST CAUSE 1865–1920* (1980).

<sup>38</sup> Thomas Dixon was arguably the most successful of the Lost Cause authors. His novels, *The Leopard’s Spots* and *The Clansman* did much to romanticize the Confederacy. D.W. Griffith turned *The Clansman* into an extremely influential silent film, *The Birth of a Nation*, which glorified the Old South and the Ku Klux Klan. *Gone with the Wind* brought the Lost Cause mythology to an even larger number of Americans. For more on the role of the novel in defending the ideology of slavery, see MARLI F. WEINER, *MISTRESSES AND SLAVES: PLANTATION WOMEN IN SOUTH CAROLINA, 1830–80, 89–93* (1998).

houses unwittingly further this mythmaking.<sup>39</sup> The presence of these beautiful, Tara-like buildings reaffirms the idea that Southern planters had achieved a level of wealth and sophistication unmatched by their Northern peers. The homes also buttress the credibility of the larger Lost Cause narrative. Standing in the shadow of the South's great architectural forms, day after day, it becomes easy to imagine that the old stories of chivalrous men, virtuous women, and cheerful "servants" contain some truths.

But this is not what the South was like before the war. Very few Southerners actually lived in grand white-columned estates. Even among the wealthy planter class, such homes were a "rare phenomenon"<sup>40</sup> and an "insignificant element of the cultural landscape . . ."<sup>41</sup> Indeed, visitors to the Southern states often commented on the squalor of the wooden homes where slave owners resided.<sup>42</sup> More importantly, the idealized version of Old South elides the narratives of African Americans. The economy of the South was not driven by mint juleps on the veranda or balls upon the lawn. Rather, southern society relied on labor extracted from black people at the point of a gun. The seductive beauty of the sorority homes does not capture this history or the legacy of the plantation as a locus of pain and uncompensated work. Instead, the buildings encourage an uncritical nostalgia for the past that never existed.

It is important not to oversell these arguments. We should never equate the questionable design choices of a sorority with a cross-burning or other virulent hate speech. No Doric column or breezy veranda will ever broadcast that kind of terror. However, sororities deserve criticism for intentionally constructing their houses to resemble antebellum plantations. To build a sorority house in the shape of a slaveholder's estate promotes the idea that we can enjoy, a la carte, the grandeur of the antebellum South, while ignoring its many atrocities. This is the very same logic that undergirds Confederate monuments; communities erect memorials to the courage of rebel soldiers, without acknowledging the barbaric cause that led them to war.

## *B. Sororities are Confederate Monuments Because they Remain Segregated*

### *i. Sororities are Segregated*

While the design decisions of Greek organizations suggest their affinity for the Old South, there is another, darker reason to view sororities as Confederate monuments; Greek organizations remain profoundly segregated institutions. At

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<sup>39</sup> See J.W. Joseph, *White Columns and Black Hands: Class and Classification in the Plantation Ideology of Georgia and South Carolina Lowcountry*, 27 *HIST. ARCHAEOLOGY*, no. 3, 1993, at 57, 59, 65 (arguing that the architecture of plantation emphasized and supported the racial caste system); E. Arnold Modlin, Jr., *Representing Slavery at Plantation-House Museums in the U.S. South: A Dynamic Spatial Process*, 39 *HIST. GEOGRAPHY*, no. 1, 2011, at 147, 148 (arguing that plantation sites often "reflect ideas of grandeur and hospitality as represented in the popular book and movie, *Gone with the Wind*").

<sup>40</sup> Bonner, *supra* note 10, at 371.

<sup>41</sup> Zelinsky, *supra* note 10, at 11.

<sup>42</sup> See Bonner, *supra* note 10, at 374.

almost all universities, the sorority system sorts freshmen into racially isolated enclaves before the start of classes, and then keeps them sequestered during the next four years. White sorority women live in separate housing, have separate friend groups,<sup>43</sup> and participate in separate social activities from their similarly situated black peers. With very little pushback, the sororities and fraternities have accomplished what the Lost Cause could not; they have normalized a world where African Americans and whites inhabit completely different spheres.

The Greek system has a long history of resisting integration and furthering the ideals of the Confederacy.<sup>44</sup> For many years, segregation was the explicit policy of the nation's traditionally white Greek clubs. Fraternities and sororities routinely inserted "white clauses" into their constitutions, limiting membership to "men of the Caucasian race, whose ideals and beliefs are those of modern Christian civilization."<sup>45</sup> Although these official policies were largely jettisoned in the 1960s,<sup>46</sup> an informal system of discrimination continued. Certain national Greek organizations "made it known to all their chapters that while discrimination might not be codified, nonwhites would never meet . . . approval."<sup>47</sup> In some places, the de facto color line persisted until quite recently. At the University of Arkansas, the historically white sororities—referred to as the "Panhellenic sororities"—did not accept their first black members until 2003.<sup>48</sup> At the University of Alabama, many sororities did not integrate until 2013.<sup>49</sup>

But what about today? Have sororities become more diverse in the last twenty years? The short answer is "no." Like the Jim Crow South, modern sororities remain exquisitely, almost perfectly, segregated organizations. It is difficult to think of another mainstream American institution that has done so little to promote the integration of its membership. Fifty years after the Civil Rights revolution, many sororities still have no African American members. This is true even at universities with large black populations. For example, at the University of Mississippi, black students make up twelve percent of the undergraduate student body, but account for

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<sup>43</sup> Skip Hollandsworth, *The Greek Way*, TEX. MONTHLY (Mar. 1991), <https://www.texasmonthly.com/articles/the-greek-way/> [<https://perma.cc/XD6P-6Y62>] (discussing the insulated lifestyle of fraternities at the University of Texas at Austin).

<sup>44</sup> NICHOLAS L. SYRETT, *THE COMPANY HE KEEPS: A HISTORY OF WHITE COLLEGE FRATERNITIES* 172 (2009) ("By the early 1910s, then, fraternities were adding codes of exclusion to their constitutions mandating that members must be white, Christian males.").

<sup>45</sup> WM. RAIMOND BAIRD, *BAIRD'S MANUAL OF AMERICAN COLLEGE FRATERNITIES* 144 (James T. Brown ed., 10th ed. 1923).

<sup>46</sup> See Craig L. Torbenson, *From the Beginning: A History of College Fraternities and Sororities*, in *BROTHERS AND SISTERS: DIVERSITY IN COLLEGE FRATERNITIES AND SORORITIES* 15, 35–36 (Craig L. Torbenson & Gregory S. Parks eds., 2009) ("The restrictions came under attack. Many schools expelled the organizations that would not change membership restrictions.").

<sup>47</sup> SYRETT, *supra* note 44, at 255; see also Ryan P. Barone, *White Clauses in Two Historically White Fraternities: Documenting the Past & Exploring Future Implications*, ORACLE, Spring 2014, at 54, 58 ("Sigma Chi further controlled membership based on race by requiring chapters to submit pictures of all men who were given bids.").

<sup>48</sup> See Carrie Coppernoll, *Sorority to Pledge First Black*, ARK. TRAVELER, Aug. 25, 2003, at 1.

<sup>49</sup> Kayla Webley Adler, *Revolution on Sorority Row*, MARIE CLAIRE (Aug. 6, 2014), <https://www.marieclaire.com/culture/news/a10379/revolution-on-sorority-row-september-2014/> [<https://perma.cc/J8QT-9EW6>] ("In September 2013, the long-held, unofficial practice of barring black women from traditionally white sororities finally began to change.").

only .2% of the women in the Panhellenic sororities.<sup>50</sup> To put that number in perspective: each fall at Ole Miss, a little more than 1,300 women join one of the Panhellenic sororities on campus.<sup>51</sup> On average, three of those women identify as African American.<sup>52</sup> Things are not much better elsewhere in the SEC. At Auburn, the sororities are .3% black,<sup>53</sup> at Texas A&M .6%,<sup>54</sup> at Kentucky .7%,<sup>55</sup> at LSU .8%,<sup>56</sup> and at Tennessee .9%.<sup>57</sup> The University of Alabama has the largest and arguably most vibrant sorority community in the world. But there, too, the sorority system remains almost completely divided along racial lines. The undergraduate population at Alabama is over 10% African American, but the black membership of the Panhellenic sororities hovers around 1%.<sup>58</sup>

Fine-grain data on the racial composition of the individual sorority houses supplied by the University of Kentucky and Texas A&M reveals that the problem of segregation is even worse than these numbers indicate. Many sorority chapters—about a third—currently have no black sisters. It appears that most of the black students in the Panhellenic system end up crammed in one or two of the less prestigious sorority houses. The most desirable sororities tend to be the whitest. At Texas A&M the sororities have roughly 200 members each. Four of the most sought-after houses have three black members between them.<sup>59</sup> The situation is similar at the University of Kentucky; four of the the consensus top sororities have a combined four black members.<sup>60</sup> These statistics paint an ominous picture of Greek

<sup>50</sup> Email from University of Mississippi Public Records Office to Stephen Clowney, Professor of Law, University of Arkansas-Fayetteville (Dec. 11, 2019) (on file with author); *The University of Mississippi: 2018–2019 Mini Fact Book*, U. MISS., [https://irep.olemiss.edu/wp-content/uploads/sites/98/2019/03/Mini-Fact-Book\\_2018-2019.pdf](https://irep.olemiss.edu/wp-content/uploads/sites/98/2019/03/Mini-Fact-Book_2018-2019.pdf) [<https://perma.cc/7MY2-42AM>].

<sup>51</sup> Email from University of Mississippi Public Records Office to Stephen Clowney, *supra* note 50.

<sup>52</sup> *Id.*

<sup>53</sup> Email from Auburn University Open Records Office to Stephen Clowney, Professor of Law, University of Arkansas-Fayetteville (Aug. 16, 2019) (on file with author).

<sup>54</sup> Email from Texas A&M University Public Records Support to Stephen Clowney, Professor of Law, University of Arkansas-Fayetteville (Nov. 15, 2019) (on file with author).

<sup>55</sup> Email from Bill Swinford, Official Records Custodian, University of Kentucky, to Stephen Clowney, Professor of Law, University of Arkansas-Fayetteville (Nov. 6, 2019) (on file with author).

<sup>56</sup> Email from Johanna Posada, Assistant General Counsel, Louisiana State University, to Stephen Clowney, Professor of Law, University of Arkansas-Fayetteville (Nov. 25, 2019) (on file with author).

<sup>57</sup> Email from Leah Fitzgerald, Associate Attorney, Lowe Yeager & Brown LLC, to Stephen Clowney, Professor of Law, University of Arkansas-Fayetteville (Dec. 3, 2019) (on file with author).

<sup>58</sup> *Greek Student Council Membership by Race/Ethnicity*, U. ALA., <https://ofsl.sa.ua.edu/wp-content/uploads/sites/9/2011-2018-Longitudinal-Demographic-Summary-Data-Jan-2019.pdf> [<https://perma.cc/5CK5-HUTF>].

<sup>59</sup> To determine the most desirable sororities, I analyzed recent posts from the site Greek Rank. Greek Rank allows undergrads to anonymously rank the desirability of the sororities and fraternities. This methodology would certainly not withstand scientific scrutiny, but the answers of the rankers were consistent enough to draw reasonable conclusions. The consensus top-four houses are Zeta, DG, Tri Delta, and Kappa. See *Texas A&M Unniversity College Station—TAMU Sororities*, GREEK RANK, <https://www.greekrank.com/uni/81/sororities/byrank/#> [<https://perma.cc/8QGC-WA8U>]. Zeta, Tri Delta, and Kappa had no black members. DG had three. Email from Texas A&M University Public Records Support, *supra* note 54.

<sup>60</sup> Using a similar calculation method, the most desirable sororities at Kentucky appear to be ADPi, Theta, Chi O, and Tri Delta. See *University of Kentucky—UK Sororities*, GREEK RANK, <https://www.greekrank.com/uni/40/sororities/byrank/> [<https://perma.cc/V2EL-Q4UL>]; Email from Bill Swinford, *supra* note 55.

life. The sororities—especially the elite sororities—remain nearly all white institutions.

## ii. The Actions of the Sororities Cause the Segregation

Given the shocking level of segregation in the Greek system, it seems appropriate to view sororities as subtle monuments to the Confederacy. The case against sororities gets stronger when we examine the cause of the racial disparities. Evidence from college campuses demonstrates that the patterns of segregation do not result from some innocent twist of history or the personal preferences of young women making decisions about what groups best fit their needs. Rather, the record shows that the Panhellenic sororities bear continued responsibility for the homogeneity of the Greek community. Two problems persist. First, some Panhellenic sororities intentionally discriminate against African Americans. Second, and perhaps more importantly, the sororities have established a recruitment process riddled with structural barriers that prevent African Americans from fully participating in the system. Viewed through a critical lens, the entire apparatus of sorority rush seems designed to ensure that Greek organizations remain exclusively white and wealthy.

All fraternities and sororities publicly maintain that they are committed to eradicating the legacy of racism and upending their reputation for exclusivity. However, the behavior of white sorority women suggests this is not entirely true. Famously, in 2013, student reporters uncovered systematic discrimination in the University of Alabama's sorority rush process.<sup>61</sup> "We were told we do not take black girls," one sorority member revealed, "because it would be bad for our chapter—our reputation and our status[.]"<sup>62</sup> In other Alabama chapter houses, the sorority alumnae surreptitiously intervened in the rush process and rejected all of the African American women without informing the rank-and-file membership.<sup>63</sup> The pile of rejected applicants that year included Kennedy Cobb, an incoming freshman with a decorated resume.<sup>64</sup> Cobb had a 4.3 high school GPA, grew up in Tuscaloosa, and her grandfather sat on university's board of trustees.<sup>65</sup> No house on sorority row offered Cobb a bid.<sup>66</sup>

Similar incidents have been reported at other universities. One sorority member at Georgia reported that, "some sororities unofficially prefer not to extend

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<sup>61</sup> Matt Ford & Abbey Crain, *The Final Barrier: 50 Years Later, Segregation Still Exists*, CRIMSON WHITE (Sept. 11, 2013), <https://cw.ua.edu/16498/news/the-final-barrier-50-years-later-segregation-still-exists/> [<https://perma.cc/82EC-SS6R>].

<sup>62</sup> Adler, *supra* note 49.

<sup>63</sup> *Id.*

<sup>64</sup> *Id.*

<sup>65</sup> *Id.*

<sup>66</sup> *Id.* (Cobb received a bid after the university's administration stepped in). This article has focused primarily on sororities, but the same problems exist in fraternities. In his book on fraternities, Alan DeSantis reports, "I have been in deliberative meetings . . . where blocs of members have convinced their chapters to exclude blacks because of the 'dangerous' precedent it would set." ALAN D. DESANTIS, *INSIDE GREEK U: FRATERNITIES, SORORITIES, AND THE PURSUIT OF PLEASURE, POWER, AND PRESTIGE* 22 (2007). DeSantis continued, "At one such rush meeting, Mark, a senior Kappa, asserted that, if the chapter extended a bid to Jason, a young black man from Chicago, the floodgates would soon open, and the chapter would become 'one big ghetto . . .'" *Id.*

membership to non-white students out of fear that it will keep them from having social events with certain fraternities. Some also worry that alumni will cut funding and donations if they extend membership to African American students.”<sup>67</sup> At Southern Methodist University (SMU), a white undergraduate recently defended the exclusion of black women from her sorority, saying, “[W]e don’t want to be the house that took ‘the black’ and end up like Gamma Phi, where guys avoid them like the plague.”<sup>68</sup> White sorority members also routinely encode their racial prejudice in highly subjective judgements about an applicant’s taste or “personality.”<sup>69</sup> For instance, one insider reported that her sorority sisters focused critical attention on black applicants’ clothes.<sup>70</sup> The members would make comments like, “[o]h, she wore an ugly dress,” but, according to this observer, “it was so obviously wrong, so obviously racism.”<sup>71</sup> In other chapter houses, sorority members complain that women of color simply do not “fit” or look “comfortable” in the house.<sup>72</sup> Skin color, it seems, becomes a “quick proxy” for taste, intelligence, and a shared background.<sup>73</sup>

The bigotry of white sorority sisters is an obvious barrier to achieving a more diverse Greek system. However, the behavior of individual women cannot fully account for the extreme patterns of segregation in American Greek life. Another insidious problem lurks; the entire structure of sorority rush seems designed to exclude African American students. Decisions that the sororities have made about the format, conditions, and timing of the recruitment process all impede efforts to further integrate the Greek community.

More specifically, rush disadvantages black women in three significant ways. First, sororities give membership preferences to legacies—candidates with a familial connection to a sorority.<sup>74</sup> The Greek organizations generally afford special consideration to anyone whose grandmother, mother, or sister pledged the same

<sup>67</sup> *UGA Greek Life: Silence, Rumors, Race and Misogyny*, INFUSION MAG. (Apr. 20, 2015), <https://infusionmagazine.com/2015/04/20/uga-greek-life-silence-rumors-race-and-misogyny-2/> [<https://perma.cc/X59H-ZRRZ>] (“written by an anonymous Panhellenic sorority member”).

<sup>68</sup> @MyPWI, TWITTER (Oct. 29, 2015, 10:03 AM), <https://twitter.com/MyPWI/status/659732218533679104> [<https://perma.cc/B3JW-BHPM>].

<sup>69</sup> See Clio Chang, Opinion, *At Sororities, Likeness Becomes Alike*, U.S. NEWS & WORLD REP. (Feb. 25, 2015), <https://www.usnews.com/opinion/economic-intelligence/2015/02/25/sorority-segregation-is-a-serious-issue> [<https://perma.cc/D5UU-CBFW>] (discussing how sororities can exclude minorities by setting strict ethnocentric aesthetic standards); see also Julie Park, *Race and the Greek System in the 21st Century: Centering the Voices of Asian American Women*, 45 NAT’L ASS’N STUDENT PERSONNEL ADMIN. J., no. 1, 2008, at 103, 115–17, <https://pdfs.semanticscholar.org/614d/8bf05b3cfb2ca39d8efdd14e2da45f6e7b3f.pdf> [<https://perma.cc/T9X9-68XZ>] (discussing how systematic discrimination often gets framed as an issue of individual “fit”).

<sup>70</sup> Adler, *supra* note 49; see also @MyPWI, *supra* note 68.

<sup>71</sup> Adler, *supra* note 49.

<sup>72</sup> Park, *supra* note 69, at 115–17; see also *Students Argue Segregated Fraternities Are Not Discrimination*, 3 J. C. & CHARACTER, no. 2, Mar. 1, 2002, <https://www.tandfonline.com/doi/pdf/10.2202/1940-1639.1312?needAccess=true> [<https://perma.cc/TC48-JH9N>].

<sup>73</sup> Park, *supra* note 69, at 116.

<sup>74</sup> See, e.g., *Joining Us*, KAPPA KAPPA GAMMA, [https://www.kappakappagamma.org/Kappa/Join/Join\\_Us/](https://www.kappakappagamma.org/Kappa/Join/Join_Us/) [<https://perma.cc/9GK4-M4D7>] (“We give careful consideration to legacies . . . .”); *Legacies*, SIGMA DELTA TAU, <https://sigmadeltatau.org/join-us/sisterhood-experience/legacies/> [<https://perma.cc/RFB8-MWFY>] (“A legacy . . . shall be given special consideration when she is a candidate for membership.”).

sorority.<sup>75</sup> In the Panhellenic sororities, legacy preferences overwhelming benefit white women. The reason is obvious; as a result of decades of explicit racial exclusion, the sororities have very few black alumnae capable of passing down legacy status to their daughters.<sup>76</sup> Consider, for example, the case of Alabama. Although sororities have operated continuously at Alabama since 1904, many of the chapter houses in Tuscaloosa did not integrate until 2013.<sup>77</sup> It will be years—maybe decades—until the first group of black alumnae have children old enough to claim the advantage of legacy status.

A second structural barrier further impedes efforts to diversify Greek organizations; sorority rush requires a tremendous amount of insider information to navigate successfully.<sup>78</sup> This imposes disparate costs on African Americans. Black women—along with immigrants, ruralites, and first-generation students—generally hail from places where sorority membership remains uncommon. These communities may have not accumulated, over generations, the cultural capital necessary to unlock the rush process. For instance, many sororities ask for letters of recommendation from current alumnae.<sup>79</sup> This requirement benefits students with social networks full of college-educated women. Undergraduates from elite private high schools can easily clear this hurdle, while woman raised in poor and minority neighborhoods often struggle to meet the prerequisites.

There are also a host of informal rules that applicants must decode. Sororities at all universities, for example, have shared expectations about what the applicants should wear during each day of the week-long rush process.<sup>80</sup> Conjuring the proper outfits requires immersion in a specific cultural milieu and a Goldilocks-like devotion to getting things “just right.” The ensembles can’t be too casual or too formal. Clothes can’t be too tight-fitting or too puritanical. Fashion choices should reflect a woman’s personality but not mark her as a prima donna.<sup>81</sup> None of this is intuitive, and those not raised in the world of boutique shopping and fashion magazines face clear disadvantages. The lack of insider knowledge often makes women from underrepresented groups seem unsophisticated or awkward, and

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<sup>75</sup> ALEXANDRA ROBBINS, PLEDGED: THE SECRET LIFE OF SORORITIES 105 (2004) (stating that “a legacy is a daughter, granddaughter, or sister of a sorority member”).

<sup>76</sup> See Julie J. Park, *Asian American Women’s Perspectives on Historically White Sorority Life: A Critical Race Theory and Cultural Capital Analysis*, ORACLE, Fall 2012, at 1, 10 (discussing how legacy status hurts minority applicants).

<sup>77</sup> See discussion *supra* Section I.B.1.

<sup>78</sup> See Alyssa Giacobbe, *The Strange World of Sorority Rush Consultants*, TOWN & COUNTRY (Sept. 15, 2017), <https://www.townandcountrymag.com/leisure/arts-and-culture/a12108142/sorority-rush-consultants/> [<https://perma.cc/D9EN-US2L>] (describing how sorority consultants teach potential new members about the unwritten rules of rush).

<sup>79</sup> ROBBINS, *supra* note 75, at 203–04.

<sup>80</sup> The internet is full of webpages that dole out advice on what applicants should (and shouldn’t) wear to rush. There are thousands of Pinterest images devoted to recruitment outfits and dozens of YouTube tutorials. See, e.g., *What Should I Wear for Fall 2020 Recruitment?*, U. ALA. PANHELLENIC ASS’N, <http://www.uapanhellenic.com/what-do-i-wear-to-recruitment> [<https://perma.cc/A88W-F93T>] (showing examples of outfits for each day of rush); *What to Wear*, U. COLO. BOULDER, <https://www.colorado.edu/greeks/what-wear-2> [<https://perma.cc/KCB2-77AL>] (describing what potential new members should wear each day of rush).

<sup>81</sup> See Giacobbe, *supra* note 78 (describing the crucial role of dressing properly during rush).

ultimately diminishes their ability to join tradition-thick Greek organizations. The imbalances are made worse by the timing of sorority recruitment. In the SEC, rush generally occurs during the summer—immediately before the official start of classes freshman year.<sup>82</sup> Universities provide no opportunity for those unfamiliar with the system to thoughtfully investigate the sororities or decipher the strange constellation of peevishly enforced social rules. The process remains firmly tilted against those—like black women—who arrive on campus without a prior understanding of how the game is played.

A third and final systematic barrier prevents many black women from rushing Panhellenic sororities; greek organizations are dearly expensive. At the University of Florida, the average dues for the Panhellenic sororities surpass \$1,800 *per semester*.<sup>83</sup> This number is not an aberration. The dues per semester exceed \$2,000 at the University of Mississippi sororities,<sup>84</sup> \$1,500 at University of Georgia,<sup>85</sup> and \$1,480 at the University of Tennessee.<sup>86</sup> Most striking of all, at Mississippi State, the price of the first semester (the most costly) can exceed \$2,500.<sup>87</sup> And such fees are only a part of the real cost. Members face enormous pressure to expend large sums on T-shirts, formal dances, crafts, and fundraisers. Sorority sisters also spend significant amounts of money on each other. As the *New York Times* detailed, “[o]nce Bigs [older women] choose one or more new members to mentor (Littles), they take them out regularly. They secretly decorate their Littles’ rooms, and bake and craft gifts to shower on them.”<sup>88</sup> These costs add up over the course of year. One study from William & Mary found that sorority members were spending \$500 per mentee.<sup>89</sup>

The hefty dues and secondary fees render sororities inaccessible for all but the most well-off young women. The costs also have notable racialized effects. Black undergraduates enter college with far fewer financial resources than their white peers. At public four-year institutions, like those that comprise the SEC, almost

<sup>82</sup> *But see 2019–2020 Sorority Recruitment Calendar*, OFFICE GREEK LIFE, [https://www.vanderbilt.edu/greek\\_life/](https://www.vanderbilt.edu/greek_life/) [<https://perma.cc/BN49-RKDM>] (at Vanderbilt, rush occurs in January).

<sup>83</sup> *See Financial Information*, UF PANHELLENIC COUNCIL, <https://www.ufpanhellenic.org/financial-information> [<https://perma.cc/2G8Y-V54Z>].

<sup>84</sup> *See Panhellenic Sorority FAQs*, U. MISS. PANHELLENIC COUNCIL, <https://panhellenic.olemiss.edu/faq/> [<https://perma.cc/8NL6-68JV>] (showing that dues can reach \$3,000 per semester for members that do not live in the house); *see also* Comment to *How much does a sorority at ole miss typically cost each year?*, GREEK RANK (Jan. 17, 2017, 5:34 PM), <https://www.greekrank.com/uni/72/topic/1241611/cost/> [<https://perma.cc/RPU8-L5SN>] (estimating costs at around \$3,000 per semester).

<sup>85</sup> *Sorority Life: Sorority Finances*, U. GA. GREEK LIFE, [https://greeklife.uga.edu/content\\_page/panhellenic-sorority-life-content-page](https://greeklife.uga.edu/content_page/panhellenic-sorority-life-content-page) [<https://perma.cc/GY5E-QKVC>].

<sup>86</sup> *Kappa Delta*, U. TENN. OFFICE SORORITY & FRATERNITY LIFE, <https://gogreek.utk.edu/chapters/kappa-delta-kd/> [<https://perma.cc/Z5DA-YNZE>] (stating that the non-residential membership cost is \$795).

<sup>87</sup> *2019 Panhellenic Sorority Cost—Breakdown*, MISS. ST. U., <https://www.union.msstate.edu/sites/www.union.msstate.edu/files/2019%20Panhellenic%20Sorority%20Cost%20-%20Breakdown%20and%20Total%202019.pdf> [<https://perma.cc/AWX2-4WU2>] (putting the average cost over \$2,300). For comparison, the per-semester tuition at Mississippi State is about \$4,400. *Cost of Attendance*, MISS. STATE U. STUDENT FIN. AID, <https://www.sfa.msstate.edu/cost/> [<https://perma.cc/52PW-Y4YE>] (follow “2019–2020 Published Cost of Attendance for MSU” hyperlink).

<sup>88</sup> Risa C. Doherty, *Greek Letters at a Price*, N.Y. TIMES (Oct. 28, 2014), <https://www.nytimes.com/2014/11/02/education/edlife/greek-letters-at-a-price.html> [<https://perma.cc/1IE9X-XD35>].

<sup>89</sup> *Id.*



ninety percent of African American students rely on federal loans to pay for their education.<sup>90</sup> In contrast, only sixty percent of whites finance their degrees with borrowed funds.<sup>91</sup> Black students not only take out loans more frequently, they also borrow significantly more money—thousands more on average.<sup>92</sup> Thus, for many, the size of their bank account rather than any defect in their character prevents them from joining the communal hub of undergraduate life.

Importantly, the particulars of the recruitment process—the schedule of events, the requirements for membership, and the cost—are all firmly under the control of the Greek organizations. The sororities, if they wanted to affect change, could quickly revolutionize the methods of recruiting and selecting new members. But they don't. They have chosen the comfort of their traditions over an honest reckoning with the consequences of their policies. A similar sensibility propelled life in the antebellum era. Like Southern statesmen before the war, the leaders of the Panhellenic sororities believe that systematic change would destroy their way of life and that pursuing racial equality isn't worth the costs. For this reason, we should view Greek organizations as an ongoing tribute to the ideals of the Confederacy.

## II. MOVE THE MONUMENT? WHAT TO DO ABOUT SORORITY HOUSES

The previous section argued that sorority houses are subtle monuments to the Old South. This essay now pivots and asks what, if anything, universities can do to mitigate the costs imposed by the Greek organizations. Is there any policy change or legal intervention that could push sororities to become more inclusive? To those unfamiliar with the inner workings of the Greek system, it may not be immediately obvious how universities can exert any influence over the fraternities and sororities. After all, the fraternities and sororities remain private organizations that retain the right to choose their own members and set their own priorities.

What leverage does the university have? My research on SEC schools reveals that the common wisdom about the Greek system is wrong: sororities and fraternities do not operate as independent, stand-alone entities. Public universities have become intimately involved in the day-to-day operation of most Greek organizations. For instance, the overwhelming majority of Greek houses sit on land owned by the university.<sup>93</sup> Moreover, almost all large universities have a professionally staffed

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<sup>90</sup> Ben Miller, *New Federal Data Show a Student Loan Crisis for African American Borrowers*, CTR. AM. PROGRESS (Oct. 16, 2017, 9:00 AM), <https://www.americanprogress.org/issues/education-postsecondary/news/2017/10/16/440711/new-federal-data-show-student-loan-crisis-african-american-borrowers/> [<https://perma.cc/XL8H-UHGG>].

<sup>91</sup> *Id.*

<sup>92</sup> See MARK HUELSMAN, *THE DEBT DIVIDE: THE RACIAL AND CLASS BIAS BEHIND THE "NEW NORMAL" OF STUDENT BORROWING* 2–3 (2015); Judith Scott-Clayton & Jing Li, *Black-White Disparity in Student Loan Debt More than Triples After Graduation*, EVIDENCE SPEAKS REP., Oct. 20, 2016, at 3.

<sup>93</sup> See Robert Manley & Timothy M. Burke, *Greek Houses on University Land*, FATERAL L. NEWSL. (ManleyBurke, Cincinnati, Ohio), Jan. 2004, at 1, <https://fratellaw.com/wp-content/uploads/2018/12/087-January-2004.pdf> [<https://perma.cc/C4LF-YK9K>].

Office of Greek Life that supports and guides the fraternities and sororities.<sup>94</sup> University employees oversee the recruitment process, conduct leadership training, organize forums on chapter operations, ensure compliance with university rules, monitor academic performance, and “serve as a liaison between faculty, alumni advisors, inter/national offices, and parents.”<sup>95</sup> All Greek organizations in the SEC rely heavily on this state-funded infrastructure. The prodigious level of support that universities have bestowed on the sororities gives the state a significant leverage to nudge the Greek system toward more just outcomes.

### A. Disaffiliate with the Greek Organizations

A few observers have pushed universities to initiate radical change. They suggest that, unless Greek organizations fundamentally alter the character of their operations, universities should ban them from campus.<sup>96</sup> Specifically, universities could refuse to recognize the Greek organizations as official student groups, denying them access to university funds, email listservs, advisors, meeting spaces, and events like homecoming. Ousting the Greek social clubs from the heart of university life has the potential to transform the culture of higher education.<sup>97</sup> Observers have long predicted that without fraternities and sororities, campuses would become more egalitarian, more welcoming to minorities,<sup>98</sup> and safer for women (sorority members are nearly twice as likely to experience sexual violence as other undergraduates).<sup>99</sup>

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<sup>94</sup> See, e.g., *Meet Our Staff*, U. MISS. FRATERNITY & SORORITY LIFE, <https://greeks.olemiss.edu/staff/> [<https://perma.cc/C7PX-PZC6>]; *Meet the Staff*, U. KY. GREEK LIFE, <https://www.uky.edu/greeklife/meet-staff> [<https://perma.cc/RE3J-733D>].

<sup>95</sup> *About*, U. ALA. FRATERNITY SORORITY LIFE, <https://ofsl.sa.ua.edu/about/> [<https://perma.cc/F7FC-GSM5>].

<sup>96</sup> See Lisa Wade, *Why Colleges Should Get Rid of Fraternities for Good*, TIME (May 19, 2017), <https://time.com/4784875/fraternities-timothy-piazza/> [<https://perma.cc/C2XQ-KVCZ>] (arguing that abolition of fraternities and sororities is “the only answer” to the problems caused by the Greek system).

<sup>97</sup> Swarthmore is the most recent college to attempt to change its campus culture by banning all Greek organizations. See Christina Maxouris & Rob Frehse, *Swarthmore College Bans Fraternities and Sororities After Allegations of Racist, Homophobic and Misogynistic Behavior*, CNN (May 11, 2019 12:19 AM), <https://www.cnn.com/2019/05/11/us/swarthmore-college-bans-fraternities/index.html> [<https://perma.cc/VK2C-MXLT>].

<sup>98</sup> See Matthew W. Hughey, *Crossing the Sands, Crossing the Color Line: Non-Black Members of Black Greek Letter Organizations*, 11 J. AFR. AM. STUD. 55, 57 (2007) (“Researchers have found that those who live in Greek housing (usually white Greeks) are much less conscious of social injustice and less culturally aware. This is strikingly similar to earlier work that found white Greeks more Eurocentric in their worldviews than their non-Greek white peers.”).

<sup>99</sup> See Cortney A. Franklin, *Sorority Affiliation and Sexual Assault Victimization: Assessing Vulnerability Using Path Analysis*, 22 VIOLENCE AGAINST WOMEN 895, 896 (2016) (summarizing that “empirical research has demonstrated a positive significant relationship between membership in sororities and sexual assault”); see also Jacqueline Chevalier Minow & Christopher J. Einolf, *Sorority Participation and Sexual Assault Risk*, 15 VIOLENCE AGAINST WOMEN 835, 844–45 (2009) (finding that even controlling for alcohol use the risk of sexual assault associated with sorority membership remains “very high”); Marina N. Rosenthal et al., *Preliminary Results from the UO Sexual Violence and Institutional Behavior Campus Survey, 14 October 2014 Update Greek System and Sexual Violence Update* (Oct. 14, 2014), <https://dynamic.uoregon.edu/jjf/campus/UO-campus-Greek-14Oct%2014.pdf> [<https://perma.cc/9FCD-HU8M>] (showing that Greek women at the University of Oregon were nearly twice as likely than their non-Greek counterparts to experience non-consensual sexual contact).

It would also send a powerful message that state universities will not condone organizations that remain profoundly segregated.

The wisdom of this approach is not entirely theoretical. Many small colleges in the Northeast have banned Greek life and witnessed the flowering of a more inclusive campus culture. An administrator at Colby College reported that “[l]ife is much better [without the Greeks]” and that the social climate “is much healthier than it used to be.”<sup>100</sup> A student at Middlebury concurred, “I think Middlebury student culture is a lot more balanced and inclusive than it would be with the presence of Greek life . . . The people who would be in frats and sororities are still there for sure, but they don’t dominate the social scene.”<sup>101</sup> Colleges like Colby and Middlebury (and also Alfred, Bowdoin, Amherst, and Williams) are lauded for their vibrant community life, extensive on-campus housing options, and satisfied alumni—strengths that seem tied, at least in part, to the lack of fraternities and sororities.

Although banning (or fundamentally altering) Greek life could bestow real and lasting benefits, any threat to the fraternities and sororities at large Southern universities seems destined to fizzle. Quite simply, too many entrenched interests within the universities support the Greek organizations to expect any large-scale change.<sup>102</sup> Take university presidents; high-level administrators often champion fraternities and sororities because Greek organizations tie alumni “to their colleges in a powerful and lucrative way.”<sup>103</sup> For example, researchers discovered that while only nineteen percent of the alumni at Indiana University had participated in Greek life, they accounted for over sixty percent of gifts to the school.<sup>104</sup> College housing officials also rely heavily on Greek organizations. Across the country, thousands of undergraduates currently live in fraternity and sorority houses, saving universities “untold millions of dollars in the construction and maintenance of campus-owned and -controlled dormitories.”<sup>105</sup> Finally, many state universities use the lure of Greek life in their admissions materials. As one official at Arkansas said, “We’re competing to attract a kind of student who’s looking for big time football, a business major, and an active Greek scene. The fraternities and sororities are a real draw.”<sup>106</sup> Given these political and economic realities, it seems relatively certain that Greek organizations

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<sup>100</sup> Zach Schonfeld, *Inside the Colleges That Killed Frats for Good*, NEWSWEEK (Mar. 10, 2014, 12:24 PM), <https://www.newsweek.com/inside-colleges-killed-frats-good-231346> [<https://perma.cc/XGP6-E74W>].

<sup>101</sup> *Id.*

<sup>102</sup> Jake New, *Banning Frats?*, INSIDE HIGHER EDUC. (Sept. 30, 2014), <https://www.insidehighered.com/news/2014/09/30/should-colleges-ban-fraternities-and-sororities> [<https://perma.cc/PSW2-52UW>] (arguing that banning the social fraternities from large state universities “would be a difficult (if not impossible) endeavor”).

<sup>103</sup> Caitlin Flanagan, *The Dark Power of Fraternities*, ATLANTIC (Sept. 9, 2019, 2:00 PM), <https://www.theatlantic.com/magazine/archive/2014/03/the-dark-power-of-fraternities/357580/> [<https://perma.cc/VJC2-EM6N>].

<sup>104</sup> Kalhan Rosenblatt, *Colleges Are Suspending Greek Life. Don't Expect the Ban to Last*, NBC NEWS (Nov. 19, 2017, 4:58 AM), <https://www.nbcnews.com/storyline/hazing-in-america/colleges-are-suspending-greek-life-don-t-expect-ban-last-n821351> [<https://perma.cc/8G33-A9V4>].

<sup>105</sup> Flanagan, *supra* note 103.

<sup>106</sup> Interview with Melissa Harwood-Rom, *supra* note 5; *see also* Rosenblatt, *supra* note 104 (quoting an expert on Greek life saying, “[f]raternities are a huge draw for universities, and they’re more popular than they’ve ever been”).

will remain entrenched at large state universities for the foreseeable future. Those worried about the costs imposed by the sororities would better serve their cause by focusing on more attainable solutions.

### B. *Take Control of the Architecture*

Fortunately, there are more practical interventions than threatening to ban Greek entities from campus. To start, university officials could improve campus life for minority students by ending the construction of sorority houses that resemble slaveholding estates. This policy proposal could be enacted immediately, at no cost, and with very few negative consequences to the Greek system.

But how exactly would universities gain control over the design decisions of the sororities? The key insight is that, in the SEC, almost all sororities sit on land owned by the universities. On some campuses—like the University of Tennessee<sup>107</sup> and the University of Kentucky<sup>108</sup>—the state actually finances, builds, and operates the sorority houses. Tennessee and Kentucky very obviously have the power to create Greek houses with more welcoming architecture. In other states, the universities rent land to the Greek organizations on favorable long-term contracts. Sororities at the University of Arkansas, for instance, generally sign a renewable fifty-year lease and pay ten dollars of rent each calendar year.<sup>109</sup> In exchange for these generous terms, the Greek organizations submit to a throng of university rules—including regulations that give the state control over the sororities' aesthetic choices.

A few universities, like Alabama and Mississippi, have implemented very strict building codes.<sup>110</sup> Alabama's design guidelines mandate the use of certain architectural motifs and construction materials. All sorority houses, for example, must use "red brick exterior, . . . concrete trim, . . . columned entries where appropriate, and fenestration of single hung operable windows with divided lites."<sup>111</sup> Even at schools without a defined architectural style the administrations still retain considerable influence over the appearance of campus. SEC universities have design

<sup>107</sup> At the University of Tennessee, the University donated the land for the new Sorority Village while the sororities raised money for construction. *Sorority Women Break Ground Sunday*, T NEWS (Apr. 29, 2011), <https://news.utk.edu/2011/04/29/sorority-groundbreaking/> [<https://perma.cc/8LR6-9FBU>]. The University also maintains the houses and collects rent. *See Housing*, U. TENN. OFFICE SORORITY & FRATERNITY LIFE, <https://gogreek.utk.edu/housing/> [<https://perma.cc/F59A-7DPL>] (explaining that the university collects rent for women living in the sorority houses).

<sup>108</sup> *See Greek Park*, U. KY. GREEK LIFE, <https://www.uky.edu/greeklife/greek-park> [<https://perma.cc/9TBL-6BPJ>] (linking to a map that reveals which houses are owned and operated by the University). Not all Greek houses at Kentucky are owned by the University; many sit on state-owned land but are operated by the Greek organizations. *Id.*

<sup>109</sup> *See Lease Agreement Between Board of Trustees of the University of Arkansas and Alpha Chi Omega National Housing Corporation*, 6 (May 15, 2017) (on file with author).

<sup>110</sup> *See Architectural Design Guidelines*, U. MISS. (Dec. 2009), [https://facilities.wp.olemiss.edu/wp-content/uploads/sites/54/2014/02/OleMiss\\_Design\\_Guidelines.pdf](https://facilities.wp.olemiss.edu/wp-content/uploads/sites/54/2014/02/OleMiss_Design_Guidelines.pdf) [<https://perma.cc/WZ4V-PKKJ>].

<sup>111</sup> *UA Design & Construction Guidelines: Architectural Heritage, Character and Design*, U. ALA. (Mar. 1, 2018), <https://constructionpublicinfo.ua.edu/wp-content/uploads/Design-Guidelines/Section-I/01-Architectural-Heritage-Character-and-Design.pdf> [<https://perma.cc/6A5Q-64CE>]; *see generally Design Guidelines & Standards*, U. ALA., <https://constructionpublicinfo.ua.edu/resources/design-guidelines/#Part-1> [<https://perma.cc/GT9Y-2XBF>].

review boards tasked with approving the aesthetics of new construction.<sup>112</sup> Documents show that the review process often subjects proposed buildings to an exacting level of scrutiny. Phi Mu sorority at the University of Arkansas, for example, required fifteen meetings with the committee over a two-year period before securing construction approval.<sup>113</sup> Committee members discussed details as minute as the bedroom finishes, countertops, cupola shape, and exterior siding.<sup>114</sup>

The design review process offers an obvious point of intervention for ending further construction of Tara-like sorority houses. If administrators desired a more inclusive university community, they could immediately enact new policies to reshape the geography of campus. They could, for instance, prohibit the use of columns on non-academic buildings. This small tweak would make it more difficult for Greek organizations to announce their affinity for the traditions of the antebellum South. Alternatively, universities could focus on improving the decision-making processes of the building review committees. Administrators could start by educating committee members about the history and exclusionary effects of plantation-like design. Committee personnel could receive training on how to raise sensible objections and suggest alternatives when sororities express a desire to build in the plantation revival style. Universities should also recruit more diverse committee members. During the fifteen meetings that it took to approve the design Phi Mu house, no black administrators were present at any of the gatherings.<sup>115</sup> When minority groups have no voice in the decision-making process, the built environment will naturally reflect the taste and values of the dominant group.

Before moving on, it is worth noting that none of these proposed changes would negatively impact the status position of fraternities or sororities. Greek organizations could still construct grand, opulent chapter houses on campus. Plantation-like design would fall into disfavor, but nothing would prevent sororities from employing ideas embedded in the Federal, Italianate, Gothic, Craftsman, Modern, Beaux-Arts, Renaissance, Romanesque Revival, Contemporary, or Prairie School architectural styles. The new Tri-Delta house at the University of Arkansas provides an instructive example.

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<sup>112</sup> See, e.g., *Campus Environs Review Committee*, U. OF GA. FIN. AND ADMIN., <https://policies.uga.edu/Facilities/External-Areas/Committee/> (May 9, 2018) [<https://perma.cc/2KPY-8C9M>]; *Governance*, MISS. ST. U. OFF. OF PLAN. DESIGN & CONSTRUCTION ADMIN., <https://www.opdca.msstate.edu/governance/> (last visited May 13, 2020) [<https://perma.cc/AB3Z-2MQ5>].

<sup>113</sup> Email from Rebecca Morrison, Public Information Officer, University of Arkansas, to Stephen Clowney, Professor of Law, University of Arkansas-Fayetteville (July 25, 2019, 5:17 PM) (on file with author).

<sup>114</sup> *Id.*

<sup>115</sup> *Id.* I analyzed the attendance sheets for all the meetings about the Phi Mu sorority.



Figure 3: New Tri-Delta House at the University of Arkansas<sup>116</sup>

The Tri-Delta chapter building, renovated in 2018, is among the very largest Greek houses in the country and has almost 100 student beds.<sup>117</sup> Unlike most of the sororities on the University of Arkansas campus, the Tri-Delta house does not mimic antebellum architecture. Instead, the Tri-Deltas communicate the impression of stateliness and majesty with sweeping Tudor design details. The building is widely regarded as one of the most attractive houses on campus and Tri-Delta remains one of the most sought-after houses among potential new members. The Tri-Deltas' success and the beauty of their building demonstrates that there is little reason for universities to allow sororities to build mansions that resemble slaveholders' estates.

### C. Create a Diversity Index

Enacting new architecture controls would begin to remove the taint of the Confederacy from camps. But what about the racial composition of the sororities? How can universities more effectively encourage diversity in the Greek system without running afoul of the law? I suggest that the SEC universities release statistics about the racial composition of its Greek organizations. The information would then

<sup>116</sup> *Our House*, DELTA DELTA DELTA: DELTA IOTA CHAPTER U. ARK., <http://uark.tridelta.org/our-house> [https://perma.cc/9LEH-USAJ].

<sup>117</sup> See *University of Arkansas Tri Delta House Expansion and Renovation Celebrated*, U. ARK. (May 23, 2017), <https://news.uark.edu/articles/38847/university-of-arkansas-tri-delta-house-expansion-and-renovation-celebrated> [https://perma.cc/X9YP-3GXY] (stating that the Tri Delta house is 43,000 square feet and has ninety-eight beds).

be used to compile a “Diversity Index” of the sororities and fraternities at each university. The Index would function as a rough echo of the *U.S. News and World Report* analysis of colleges. The point is to gather data that universities have hidden from the public and distill it into a clear and accessible form: a ranking. To reduce subjectivity, the Diversity Index would only measure clear outputs rather than more nebulous benchmarks of a university’s commitment to multiculturalism. Specifically, the Index would focus on the racial composition of each sorority, each chapter’s retention rates across racial categories, and the demographics of the larger university.

But why would a ranking succeed where many other diversity initiatives have failed? I contend that the Diversity Index offers three benefits that would push the sororities toward greater inclusion. First, a ranking system would put social pressure on individual Greek organizations to become more integrated. The Index would not only reveal the raw number of Black, Hispanic, and Asian women in each chapter, but it would demonstrate how each sorority compares to its neighbors. If we assume that no chapter wants to end up at the bottom of a public ranking, then the list should encourage sororities to increase outreach efforts to underrepresented groups. The most optimistic hope for the Diversity Index is that it would realign the sororities’ incentives during the recruitment process. Chapter houses are always on the hunt for accomplishments to distinguish them from their peers. In the competitive environment of rush, the ranking system would give the more diverse sororities something to trumpet. Alternatively, the Diversity Index could be used as a sword to needle those chapters that remain segregated.

Second, the rankings would create a leverage point with college administrators. If SEC universities each published a composite of diversity scores for their respective Greek systems, it could foster competition between schools—not just between the individual sororities. Consider the case of Ole Miss. A public Diversity Index would surely embarrass the administrators who oversee Greek life at Mississippi. Ole Miss is among the more integrated universities in the South, but its sororities have almost no black members.<sup>118</sup> The rankings would put the Greek Life staff at Ole Miss in an uncomfortable position; they could either advocate for a package of reforms with their school or become known as the staff who oversees the most segregated sororities in the conference. The Diversity Index works because peer pressure among professional colleagues can spark change and, hopefully, spread innovations and best practices.

Skeptics may contest the premise of the Diversity Index. Viewed through one lens, the entire point of the Greek-letter organizations is to create an aura of racial and socioeconomic exclusivity. It is worth asking whether any sorority or university would really feel pressure to respond to a low ranking? Some anecdotal evidence suggests they would. Only one school in the SEC, Alabama, currently publishes data on the racial composition of its Greek organizations.<sup>119</sup> The University does not rank individual sororities or fraternities, it only records composite information. Nevertheless, the public accountability has stimulated reform. In 2011, the first year

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<sup>118</sup> See discussion *supra* Section I.B.1.

<sup>119</sup> See *Greek Student Council Membership by Race/Ethnicity*, *supra* note 58.

the University published statistics, only two of the 4,306 Panhellenic sorority members were black.<sup>120</sup> By 2018, the number of black sisters had increased to 86.<sup>121</sup> Alabama now has the most integrated Panhellenic sorority system in the SEC. The clarifying effect of hard data can “do a great deal to smooth the path for change.”<sup>122</sup>

The Diversity Index has one final value: it has potential to jumpstart grassroots organizing against sororities that resist integration. Even on campuses with active Greek communities, fraternities and sororities are not universally popular. Activists blame them for enforcing outdated gender norms, promoting the dangerous use of alcohol, and exacerbating racial tensions. An annual ranking would confirm some of the worst hunches that activists harbor about the Greek system. For instance, a Diversity Index would lay bare the depth of the segregation in some chapter houses. In the ten years between 2008 and 2017, Delta Gamma at LSU welcomed 823 new members into their sisterhood.<sup>123</sup> Only one of those women identified as African American.<sup>124</sup> Currently, this information is buried in the Office of Greek Life and only accessible through FOIA request. Making the data widely available would give organizers durable, indisputable evidence about the deep-seated problems in sorority culture and help them press for reforms.

#### D. *Move Rush Into the Second Semester*

Before concluding, this essay offers one final suggestion to encourage greater integration; universities should move the rush process to the beginning of the second semester. As mentioned earlier, at most schools the entirety of freshman rush occurs during the week before classes begin. This is deeply problematic. Women must decide if they want to join a sorority in a very vulnerable moment—after they have left home, but before they have had any opportunity to explore their interests or create a diverse set of relationships. The timing of rush also disadvantages women who hail from communities without a deep inside knowledge of the process—they must figure out the rules and customs of Greek life on the fly.<sup>125</sup>

Moving recruitment activities into the second semester would address these issues.<sup>126</sup> First, it will help women who are ambivalent about joining a sorority. If rush began in January, it would allow all freshman to carve out a social identity, meet a range of classmates, and explore a mixture of extracurricular activities before deciding to join a Greek organization. Some women who would have defaulted into the sorority system, will discover that they prefer the social life and sense of community outside of the Greek system. Of course, others will reaffirm their desire to join a close-knit sisterhood. The delay helps these women, too. They will have

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<sup>120</sup> *Id.*

<sup>121</sup> *Id.*

<sup>122</sup> Heather K. Gerken, *Shortcuts to Reform*, 93 MINN. L. REV. 1582, 1588 (2009).

<sup>123</sup> E-mail from Johanna Posada, *supra* note 56 (attaching cited data).

<sup>124</sup> *Id.*

<sup>125</sup> See discussion *supra* Section I.B.2.

<sup>126</sup> Princeton recently banned first-year students from joining fraternities and sororities. W. Raymond Ollwerther, *Freshmen to be Prohibited from Fraternities, Sororities*, PRINCETON ALUMNI WKLY. (Sept. 14, 2011), <https://paw.princeton.edu/article/freshmen-be-prohibited-fraternities-sororities> [<https://perma.cc/88W3-4QX5>].



months to observe the different sororities and thoughtfully consider which chapters best match their needs and expectations.

Perhaps more importantly, postponing rush would curtail some of the racial and economic segregation in the sororities. The delay would give university officials the opportunity to educate students from non-traditional backgrounds about the Greek system and encourage them to join. During the first semester, the office of Greek Life could send messages to the freshmen class, demystifying how sororities work and enumerating the advantages they offer to members (leadership opportunities, active alumni networks, access to student government). The university could also target minority and first-generation students for special recruitment initiatives. Greek Life staff could host information sessions, connect interested freshman with senior sorority women from similar backgrounds, and even conduct mock rush interviews.

There are other, more aggressive steps that universities could take to further level the playing field and promote integration. They could, for example, subsidize the cost of joining a sorority or mandate a basic uniform for students to wear during rush to eliminate some markers of socioeconomic status. But delaying the start of rush seems like the low-hanging fruit. Moving the recruitment process to the second semester would not require additional university expenditures, it would respect the central role of the Greek organizations in the social fabric of campus life, and it would begin to dismantle the segregation that haunts white sororities.

#### CONCLUSION

It is uncontroversial that the purpose of the Confederacy was to preserve a political order based on racial hierarchy. Before the war, white citizens all across the South expressed a “militant commitment” to denying black people access to opportunity and social power.<sup>127</sup> While white sorority officers certainly do not engage in the same kind of bellicose racism, the establishments they lead maintain links to legacy of the Old South. The most obvious tie to the past can be seen in the architecture of the modern sorority. The Greek organizations continue to build chapter houses that resemble plantations. They use pediments and porticos to harness the glamour of the antebellum era, with little regard for the black labor that tended the gardens and funded the balls. The Panhellenic sororities also remain segregated. Even as every other organ of American life has come to acknowledge the value of diversity, the sororities insist on using a recruitment system that ruthlessly excludes minority women. Universities should push back against the undeniable whiteness. And they should come to regard Greek organizations as monuments to the Confederacy. Sororities have done far more than any statue to engrain ideas about racial hierarchy and push black people to the periphery of the community.

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<sup>127</sup> Ta-Nehisi Coates, *What This Cruel War Was Over*, ATLANTIC (June 22, 2015), <https://www.theatlantic.com/politics/archive/2015/06/what-this-cruel-war-was-over/396482/> [https://perma.cc/3AKZ-MXH5].