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## Two Sides Of The Same Token: An Examination Of Segregation, Memory, And White Supremacy In Contemporary Church Schools

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Two Sides of the Same Token:  
An Examination of Segregation, Memory, and White Supremacy  
In Contemporary Church Schools

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A Thesis presented to the Graduate Faculty of The College of William & Mary in  
Candidacy for the Degree of  
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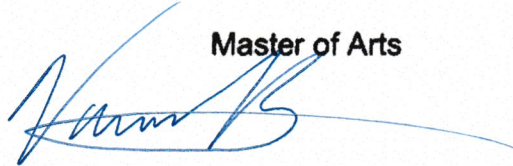
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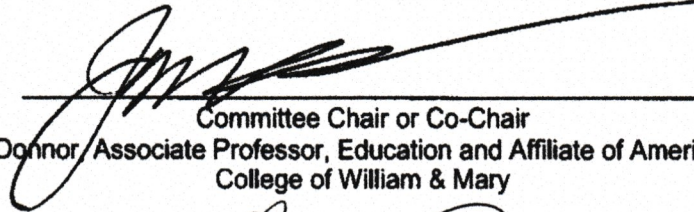
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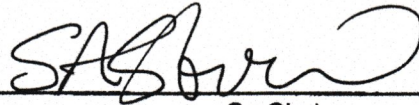
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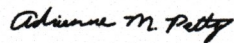
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## ABSTRACT

This thesis is a portfolio containing two essays about private Christian church schools with an introductory essay to connect both projects. The first essay, "A Convergence of Purpose: Segregation and White Supremacy in Contemporary Church Schools," is a comprehensive examination of the development and creation of church schools that first looks at the distinction between church schools and segregation academies, and then assesses the relevance that the distinction, or the lack thereof, plays in maintaining white supremacy in contemporary church schools. The second essay, "The Trauma of Tokenism: Desegregation, Memory, and White Supremacy in Contemporary Church Schools," considers the modern impact that church schools have on their Black students, using memory to extend Kanter's theory of tokenism.

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This M.A. is dedicated to my grandmother, Martha Lillian Vinson, who passed away before its completion, but who always was and would have continued to be proud of my accomplishments.

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## CONNECTOR ESSAY

As a political science undergraduate, I was always interested in American institutions – how they were created and how they remained in existence. Initially, this interest was limited to observable institutions created by the Constitution – such as the judicial and executive branch. It was not until my first year at William & Mary’s Law School, where I attended a diversity meeting with a few other students of color and Black alumni, that the institution of segregation piqued my interest. While others complained of the lack of diversity at the nation’s oldest law school, I internally thought about how William & Mary was the most diverse educational institution that I had ever attended. Others had very different experiences, which allowed them to point out problems with inclusion that I simply missed. It was this disconnect that first shifted my interest in institutions away from the government broadly, to segregated educational spaces specifically.

Reflecting on my own educational story, I realized that from elementary school to my senior year of undergraduate study, I had existed in predominantly white spaces. The importance of this realization was heightened when I attended an anniversary celebration at my former high school, a private Christian school founded in 1965. It was at that celebration that I first made the connection between religion and that maintain segregation and white supremacy. This project arises out of that connection.

Prior to graduate school, I assumed that the concept of white supremacy required some form of intentional and explicit racism. It did not occur to me that white supremacy is an institution just like any other institution. And as such, it could, and would, evolve to maintain its sphere of influence — especially in education. Accepting that more implicit forms of white

supremacy existed, I started to think about the ways in which white supremacy operates today in spaces that remain mostly segregated – like contemporary church schools.

This thesis examines the relationship between white supremacy and contemporary private church schools in two interconnected, but distinct ways: (1) by broadly examining the creation and history of these schools and how that history facilitates current levels of segregation and (2) by examining the specific memories of Black students who attend these schools and how those memories are influenced by the mostly segregated spaces. Specifically, in the first essay, “A Convergence of Purpose: Segregation and White Supremacy in Contemporary Church Schools,” I argue that these church schools incorporate an implicit form of white supremacy by maintaining mostly segregated spaces that is protected from extensive federal oversight due to the First Amendment’s religion clauses. Although I explicitly distinguish private church schools and segregation academies, I argue that the two types of institutions align, under the linguistic strategy of individual rights, in purpose – the purpose of maintaining white supremacy through segregated educational institutions (i.e., predominantly or all white spaces).

Once demonstrating that segregation serves the purpose of maintaining white supremacy in church schools, I shift gears in, “The Trauma of Tokenism: Desegregation, Memory, and White Supremacy in Contemporary Church Schools,” to focus on the affect that segregation – and by extension, white supremacy – has on the Black students who desegregate these schools. In that essay, I analyze the experiences of eleven Black students who formerly attended Portsmouth Christian School. Based on those interviews, I argue that the memories and experiences of Black students reveal a counter-narrative of tokenism that highlights the hidden

problems of desegregation. Further, I argue that this tokenism exposes how these Black students experience cultural trauma related to desegregation.<sup>1</sup>

These two papers reveal two sides of the same coin, on the one hand the segregation itself demonstrates the explicit way that white supremacy continues to have influence in these schools. On the other hand, the counter-narrative of tokenism reveals a hidden consequence of segregation and white supremacy in these schools – Black cultural trauma. Both essays examine how white supremacy can be operationalized through segregation and the different ways that segregation can be protected defensively and executed offensively. Most importantly, they demonstrate that while the government may have “a fundamental, overriding interest in eradicating racial discrimination in education,”<sup>2</sup> it is an insignificant interest if does not include private church schools.

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<sup>1</sup> In the second essay, I define the term “cultural trauma” as the marks or changes in collective identity based on shared psychological traumatic experiences, in this case, racial trauma. See Vania Blaiklock, *The Trauma of Tokenism: Desegregation, Memory, and White Supremacy in Contemporary Church Schools*, 78-79 (May 7, 2021) (unpublished M.A. Thesis, Essay #2) (on file with author).

<sup>2</sup> *Bob Jones University v. United States*, 461 U.S. 574, 604 (1983).

**A Convergence of Purpose:**

**Segregation and White Supremacy in Contemporary Church Schools**

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AMST 570: Critical Race Theory and Education

Dr. Donnor

November 16, 2020

## INTRODUCTION

In 1965, Biltmore Baptist Church sanctioned the creation of Portsmouth Christian School (“PCS”), a small private school located in Portsmouth, Virginia (Portsmouth Christian Schools [PCS], 2018, School History Section, para. 1-2). In 2015, PCS reached out to all alumni to help celebrate the school’s fiftieth year. (Ratliff, 2015) It is out of that celebration that this project was born.

As a former PCS student, I was always either the only person of color in my class or one of two. Once I started to play sports in middle school, away-games made it clear that this lack of diversity extended to other Christian schools in the area. At no point did I realize that this lack of diversity could be by design. It was not until the 2015 celebration ceremony, that I realized the role my beloved school may have played in maintaining segregation and by extension – white supremacy.<sup>1</sup>

At the end of the celebration ceremony, the schools’ founder and the founding pastor of Biltmore Baptist, T.M. Frye, delivered a speech reflecting on the history of the school (PCS, 2018, School History Section, para. 1). When discussing the origin of the school, Pastor Frye stated that in the beginning, he was unsure of whether the school would be a success. He then stated that when “that court decision came down our phones were ringing off the hook.” Immediately, he moved away from the subject without expanding further. In that moment, however, the implications of his statement floored me, considering that, in 1965, Virginia was still dealing with the fallout of *Brown v. Board of Education* (1954)’s prohibition on segregated classrooms.

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<sup>1</sup> For the purposes of this paper, “white supremacy” means the conscious or unconscious desire to maintain white dominance politically, economically, and culturally through exclusion (Mills, 2006, p.269; Harris, 1993, p.1736).



Even at the fiftieth celebration, I was one of only two people of color in an audience of seventy-five people. Could it be that Pastor Frye was, albeit implicitly, reflecting on the role that desegregation played in the success of the school I attended all those years? I cannot be sure, as he did not explicitly state what court decision led to the increased enrollment. Yet, the potential connection was enough to spark my interest in the role that Christian schools, founded during the resistance to *Brown*, played and continue to play in upholding segregated classrooms and by extension – white supremacy.

In the sixty-one years since the Supreme Court’s decision in *Brown*, there has been a plethora of research into the strategies behind southern resistance to desegregation.<sup>2</sup> Incorporated in that research has been the study of “segregation academies” (Champagne, 1973; Dorsen, 1967; *Yale Law Journal*, 1973). Essentially, after *Brown*, southern states immediately began to re-organize their schools to avoid mandatory integration (Champagne, 1973, p. 60; Littlejohn and Ford, 2012, p. 49). Segregation academies were born out of this massive resistance. (Crespino, 2007, p. 9; Dorsen, 1967, p. 41; *Yale Law Journal*, 1973, p. 1436). Typically, studies define segregation academies as private schools founded by white people, in a previously *de jure* segregated Southern state between 1954 and 1970, to avoid sending their children to integrated schools (Carr, 2012; Porter, Howell, & Hempel, 2014, p. 583).

Scholars who study the development of segregation academies typically conflate nonsectarian private schools with evangelical Christian schools (“church schools”) (Porter et. al, 2014, p. 584).<sup>3</sup> Dorsen (1967), distinguished between the two schools, but only to examine

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<sup>2</sup> For an in-depth overview of the actual *Brown v. Board of Education* decision and the nation’s immediate reactions, see Kluger, *Simple Justice* (1975).

<sup>3</sup> One exception is Rachel Winstead (2020)’s Honors Theses. Pointedly, she states that “to fully understand...racism, these schools [nonsectarian private schools and sectarian private schools] must be understood as fundamentally distinct from one another.” (Winstead, 2020, 3-4). Similarly, this paper will argue that church schools and nonsectarian segregated academies were initially distinct. However, Winstead’s work and mine differ in that she

whether the First Amendment would prohibit the state from dismantling segregation in sectarian schools (pp. 54-58).<sup>4</sup> Other scholars have briefly mentioned that the corresponding popularity of church Schools alongside segregation academies does not mean that the two were immediately one in the same (Crespino, 2007, p. 13; Dowland 2015, p. 27). These scholars acknowledge the complex reasons for the rise in church schools in the 70s and 80s but do so, only briefly, to highlight the role that segregation may have played in forming the politics of conservative white Christians. (Crespino, 2007, p. 255; Dowland, p. 30). Thus, Church schools are either mentioned in passing in an overall discussion on segregation academies or referenced briefly as a catalyst of the religious right movement.

Church schools, however, require a deeper understanding if we want to truly comprehend the role that white supremacy has played in using religion as a tool to maintain segregation as well as the role white supremacy continues to play in indoctrinating students currently attending church schools. Understanding this role of white supremacy in private church schools becomes increasingly important as the Supreme Court continues to validate and encourage the public funding of these schools (*Espinoza v. Montana*, 2020).<sup>5</sup> For this reason, I view my project as a much needed, but often forgotten, attempt to bridge two ideas through a convergence of purpose. By convergence of purpose, I simply mean that even though church schools may have been created for a purpose encompassing more than maintaining white supremacy (unlike segregation academies), in modern practice, the two schools share that common goal. Thus, this convergence of purpose forms a link between segregation academies and church schools. Keeping in mind,

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examines the history of one school in Mississippi, whereas I examine church schools broadly and when addressing specific schools, I examine schools in Virginia.

<sup>4</sup> The Supreme Court's holding in *Bob Jones University v. United States* (1983), largely outdates this argument because the court allowed the federal government to use the taxing power as an indirect way to force private sectarian schools to desegregate.

<sup>5</sup> In the upcoming 2021 term, the Court will decide *Carson v. Makin*, which again raises the issue of whether states can or cannot prohibit aid going directly to religious or sectarian schools (Docket No. 20-1088, 2021).

however, that the link is the prevalence of white supremacy, and its ability to use religion as a tool to preserve racism in America.

In light of those ideas, my objective is to demonstrate that contemporary church schools in the South, whether explicitly started as segregation academies or not, tend to incorporate the vestiges of segregation by awakening students to cultural values rooted in white supremacy – such as providing a mostly segregated education and teaching a curriculum that focuses on an American nationalism and exceptionalism rooted in whiteness.<sup>6</sup> These are the concepts that will be explored in this paper. As such, the paper is separated into two parts. In Part I, I will first describe the history and development of segregation academies in the South. Additionally, I will describe and distinguish the creation of church schools and the role they play in the history of segregation academies.

Next, in Part II, I will bridge these two schools by arguing that when segregationists embraced the language of individual rights, they created a convergence of purpose between segregation academies of the past and church schools in the present – facilitating the use of church schools as a vehicle for maintaining white supremacy. To support this argument, I will analyze the desegregation of church schools through the lens of racial realism (Bell, 1991) and strategic racism (López, 2014) – two tenets of Critical Race Theory. Finally, I will argue that church schools are uniquely situated, based on First Amendment protections, to strategically preserve white supremacy without serious federal oversight – a strategy that is likely to be more successful with the current makeup of the Supreme Court.

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<sup>6</sup> One day, I hope to expand this project to also examine the specific curriculum used in these schools to determine whether such material incorporates/teaches norms rooted in white supremacy. However, for the purposes of this paper, I will only mention and discuss curriculum superficially in Part II.

Before starting, I want to make clear that nothing in this paper is to suggest that church schools are inherently racist or hiding behind a religious smokescreen. As a product of church school education, I sincerely believe that these schools teach and believe values thought to be rooted in Christian faith and doctrine, focusing on the life of Jesus Christ and integrated with the Christian Bible (PCS, 2018, The School Section, para. 1). As such, it is not the goal of this paper to argue that these schools should not exist. Instead, it is my hope that this will be the beginning of change. Church schools are a part of my story, but that story is one riddled with white supremacy. We cannot eradicate white supremacy without an honest examination of its past and its evolution in the present.

## **PART I: THE HISTORY OF SEGREGATED ACADEMIES AND CHURCH SCHOOLS**

### *A. Segregated Academies Generally*

In the summer of 1954, the New York Times boldly proclaimed, “High Court Bans School Segregation,” on its front page (Hurstons, 1954). Chief Justice Warren had delivered the Supreme Court’s unanimous decision to denounce its “separate but equal” doctrine – at least in the field of public education – and declare segregated schools violative of the rights provided in the Fourteenth Amendment (*Brown v. Board of Education*, 1954). Famously, the court held that “separate educational facilities are inherently unequal” (*Brown v. Board of Education*, 1954, p.495). Yet, even the court appreciated the difficulties that would come with enforcing mandatory desegregation, as they hesitated to provide any instructions on implementation until a year later (*Brown v. Board of Education*, 1955).

Such hesitation was not unwarranted. States, especially in the South, immediately reacted to mandatory desegregation with outrage and violence (Champagne, 1973, p. 60). The years of

active defiance, following *Brown* (1954), are known as a time of “Massive Resistance” due to the rapid and immense opposition to desegregation embraced by state governments and school boards (Champagne, 1973, p. 60).<sup>7</sup> In some states, like Texas and Arkansas, this resistance was violent, culminating in attacks from angry mobs of white people (*Yale Law Journal*, 1973, p. 1437). Other states simply refused to comply with *Brown*, choosing instead to shut down their schools (Champagne, 1973, p. 60; MacLean, 2017, p. 62). This was the route taken by Virginia in places such as Charlottesville, Prince Edward County, and Norfolk (Champagne, 1973, p. 60; *Yale Law Journal*, 1973, p. 1437).<sup>8</sup>

Two locations, Norfolk and Prince Edward County best illustrate the gravity of Virginia’s strategic approach to Massive Resistance. In the aftermath of *Brown*, Virginia’s governing bodies developed a plan that “authorized the governor to close or cease funding integrated schools” (*Yale Law Journal*, 1967, p. 1437; see also *Griffin v. County School Board*, 1964, p. 221; Littlejohn and Ford, 2012, p. 62). Under this plan, schools in Norfolk and Prince Edward County were shut down to avoid desegregation (Littlejohn and Ford, 2012, pp. 78-79). The logic being, there could be no desegregation if there were no schools to desegregate. The re-opening of these schools required orders from federal courts (Dorsen, 1973, pp. 42-43; Littlejohn and Ford, 2012, p. 79).

In Norfolk, the governor closed six all white schools because the Norfolk school board had authorized seventeen Black students to attend those schools in 1958 (Littlejohn and Ford, 2012, p. 77). This school closure lasted from September 1958 until February 1959, when the

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<sup>7</sup> It is important to note how efficient this resistance was to desegregation. In 1967, black children attended segregated schools in greater numbers than in 1954 when the court decided *Brown*. (Dorsen, 1967, p. 40, fn. 3).

<sup>8</sup> I am focusing on acts of Massive Resistance in Virginia to put into context the schools that I describe in Part II. Additionally, it is important to note the extreme levels of resistance in Virginia because a lot of the current segregation academy research focuses solely on Mississippi and other states in the Deep South – Georgia, Alabama, Louisiana, and South Carolina (Crespino, 2007; Grady and Hoffman, 2018; Harris, 2019; Winstead, 2020).

Norfolk school board opened the schools after a federal court order (Littlejohn and Ford, 2012, p. 79, 102). Although shorter than other school closures, the closure in Norfolk affected more students than any other school closure in the region, situating Norfolk's closure at the forefront of public discourse over desegregation and making it a prime example of Massive Resistance in Virginia.<sup>9</sup>

Another example is the school closure in Prince Edward County, which lasted from 1959 until 1964, ten years after *Brown* (Dorsen, 1967, pp. 42-43). While Norfolk's closure demonstrated the vastness of Virginia's Massive Resistance, Prince Edward's closure demonstrated its longevity.<sup>10</sup> Unlike all other public schools in Virginia, Prince Edward County kept their public schools closed despite the General Assembly's decision to move away from this form of massive resistance (*Griffin v. County School Board*, 1964, pp. 222-223). Further, during this five-year period, Black students in Prince Edward County went without any formal education (*Griffin v. County School Board*, 1964, p. 223; Titus, 2011, p. 10). The public schools only opened in 1964 because the Supreme Court held that Prince Edward County's school closure violated the 14<sup>th</sup> Amendment. (*Griffin v. County School Board*, 1964, p. 225). The lasting implications of the closure, however, continued for generations (Titus, 2011, p. 10).<sup>11</sup>

While school closures meant no school at all for some Black students, the same was not true for white students (Dorsen, 1967, p. 43; Titus, 2011, p. 34).<sup>12</sup> Instead, locales in Virginia

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<sup>9</sup> For a comprehensive overview of the Massive Resistance that took place in Norfolk, see Littlejohn and Charles Ford, *Elusive Equality* (2012).

<sup>10</sup> This is not to suggest that the Prince Edward County closure did not have lasting effects on the students. It is just meant to highlight the length of time that the closure existed in contrast to Norfolk, where the closure was only one year, but effected a larger population of students.

<sup>11</sup> For example, the students who were prohibited from being educated during this time never truly recovered from their lack of education (Titus, 2011, p. 204). Thus, leaving them illiterate and unable to assist their children with homework or obtain jobs that offered more than minimum wage. (Titus, 2011, p. 204).

<sup>12</sup> In a way, this reinforces the notion that "separate and unequal" was to be the law of the land. Even in shutting down schools, state education treated Black children unequally.

created and developed private schools that white students could attend – outside of the legal reach of *Brown* (Champagne, 1973, p. 66; *Yale Law Journal*, 1973, p. 1438).<sup>13</sup> Additionally, Virginia’s government provided white parents with grants to assist with the financial cost of private schools. (Dorsen, 1967, pp. 42-43).<sup>14</sup> As in Virginia, other southern states also used this loophole in *Brown* to maintain segregated private institutions, appropriately called segregation academies (Champagne, 1973, p. 58; Grady and Hoffman, 2018, p. 2; *Yale Law Journal*, 1973, p. 1436). Once the courts invalidated Massive Resistance – in the form of school closings – Southern states, like Virginia, put their energy into private schools and “freedom of choice” plans (*Griffin v. County School Board*, 1964, pp. 221-222; see also Crespino, 2007, p. 173).<sup>15</sup>

Further, even though *Brown* was decided in 1954, it was not until the Civil Rights Act of 1964 that white parents started to really flock toward segregation academies (Champagne, 1973, p. 61; Crespino, 2007, p. 9; Porter et. al., 2014, p. 578). There are a few reasons for this delay. First, because of the imprecise language in *Brown II*, locales were allowed to determine how and when desegregation would occur which led to, “a range of legal and extra-legal strategies,” that frustrated integration (Porter et. al., 2014, p.578). These legal strategies included a shift in linguistic focus from the issue white segregation based on racial superiority to the issue of private choice (Champagne, 1973, p. 61; Crespino, 2007, p.9). Additionally, in the 1970s the economy in the South began to increase, “providing many middle-class families with the economic means to afford private tuition.” (Porter et. al., 2014, p. 578). Thus, private schools grew tremendously in the late 1960s and early 1970s as public schools began to truly integrate.

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<sup>13</sup> Notably, *Brown* only applied to the “field of public education” (*Brown v. Board of Education*, 1954); thus, creating a caveat that white supremacist immediately exploited.

<sup>14</sup> After much litigation, the Eastern District of Virginia held that the statutes authorizing these grants were unconstitutional because the grants represented state assistance to “a racially segregated education” (*Griffin v. State Bd. of Education*, 1969).

<sup>15</sup> A lot of modern studies on segregation academies examine the connection between these schools and current “school choice” plans (Grady and Hoffman, 2018; Minow, 2011).

(*Yale Law Journal*, 1973, p. 1444). For example, in 1973, *Yale Law Journal* estimated that total enrollment in private schools increased from 25,000 students in 1966 to 535,000 by 1972. (*Yale Law Journal*, 1973, p. 1444).

For this reason, the baseline definition of a segregation academy is a private school founded in the South sometime between the 1960s and the 1970s (Carr, 2012; Champagne, 1973, p. 58; Porter et. al, 2014, p. 578).<sup>16</sup> At times, this baseline definition is supplemented by the requirement that the private school was state funded to demonstrate an explicit attempt by southern states to avoid desegregation (Dorsen, 1967. pp. 44-45; *Yale Law Journal*, 1973, p. 1444). For example, the *Yale Law Journal* (1973) defined segregated academies as a school that fit the founding date requirement and that were “first opened with tuition grants from state governments” (p. 1444). However, Champagne (1973) – publishing at the same time as the *Yale Law Journal*’s article – chooses not to make state monetary support a strict requirement for the definition of segregation academies because he found that these direct grants from states were “no longer common.” (p. 58). Regardless of whether the definition includes direct monetary support from the state, the key point is that segregation academies were created in the 1960s and 1970s as the result of white supremacist ideology focused on perpetuating white dominance through white exclusivity – particularly in keeping the image of all white schools, despite *Brown*. (Champagne, 1973, p. 63; Dorsen, 1967, p. 41; Harris, 1993, p. 1736). As such, these schools remained segregated until the Supreme Court’s intervention.

The Supreme Court requires these private schools to integrate in *Runyon v. McCrary* (1976).<sup>17</sup> *Runyon* closed the private school exception to *Brown* by holding that 42 U.S.C. §1981

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<sup>16</sup> This timeline distinction is important because private schools (both nonsectarian and sectarian) did exist in small quantities prior to the *Brown* decision. Segregated academies are distinguishable because of the “timing and conditions under which they emerged” (Porter et. al, 2014, pp. 577-578).

<sup>17</sup> Codified in 42 U.S.C. §1981.



(1866), a federal law against private discrimination in contracts, “prohibits private schools from excluding qualified students solely because they are Negroes” (*Runyon v. McCrary*, 1976, p. 163)<sup>18</sup>. Yet, this decision did not substantively change the racial makeup of the former segregation academies and many of these schools remain majority white schools. (Porter et. al, 2014, p. 594-596; see also Carr, 2012). For example, in Porter et. al. (2014)’s study on the survival of segregation academies, they found that in areas where “whites formally organized during the civil rights movement have higher rates of enrollment in academies relative to other communities in the South.” (p. 595). These results suggest that the original purpose of segregation academies persist into their current existence.

As such, scholars typically limit their research on segregated academies to schools located in Mississippi or other deep south states – such as Louisiana, Alabama, South Carolina, and Georgia (Carr, 2012; Crespino, 2007; Grady and Hoffman, 2018; Harris, 2019). Mississippi gets a lot of focus because it was the home to “the first significant organization of segregationist resistance, the Citizens’ Council” (Crespino, 2007, pp. 4-5). The Citizens’ Council’s first chapter was in Indianola, Mississippi (Fuquay, 2002, p. 161), which is also home to Mississippi’s most famous segregation academy, Indianola Academy, a school still open today (Fentress, 2020). As a part of their segregationist strategy, the Citizens’ Council started the Council School Foundation that funded private schools in Mississippi with both public and private money (Fuquay, 2002, pp. 159-160; Rolph, 2018, pp. 151-152). The council was instrumental to the proliferation of private segregated schools in Mississippi and beyond (Fuquay, 2002, p. 159). Additionally, like the other deep south states, Mississippi’s resistance to the civil rights movement was often violent, and between 1954 and 1964, some of the “most ghastly, high-

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<sup>18</sup> Importantly, *Runyon* also reaffirmed the right of private schools to teach whatever material they wanted, including segregationist dogma (*Runyon v. McCrary*, 1976, p. 176).

profile acts of racial violence,” such as the death of Emmett Till, occurred in Mississippi (Crespino, 2007, pp. 4-5).<sup>19</sup> For these reasons, scholars generally situate their work on segregation academies in Mississippi or states similarly situated.

Typically, these projects focus on both the history of segregated academies and the extent to which these schools still racially segregate (Carr, 2012; Porter et. al, 2014). Additionally, scholars have used the history and current impact of segregated academies to examine what implications these schools might have for modern school choice policies. (Grady and Hoffman, 2018; Minow, 2011).<sup>20</sup> These projects demonstrate the relevance of segregated academies in current times.

### *B. Distinguishing Church Schools*

Except for a few specific exceptions, scholars have historically conflated church schools founded during this time into the general definition of segregation academies (*Yale Law Review*, 1973, p. 1444; see also Champagne, 1973, p. 58; Fentress, 2020; Porter et. al, 2014, p. 584).<sup>21</sup> This is understandable because evangelical church schools also started to flourish in the 1960s and 1970s, during the time of increased efforts to desegregate local schools (Crespino, 2007, p. 248).<sup>22</sup> As the founding of these schools overlap, it is easy to assume that they were created for

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<sup>19</sup> The University of Mississippi riot of 1962 also serve as another high-profile example of the racial violence in Mississippi during this period (Meredith, 1966, p. 224). The riot occurred due to the admittance of James Meredith, a Black man, to the school (Meredith, 1966, p. 224).

<sup>20</sup> Future research on this topic, might explore the influence of white supremacy on school choice plans. I do not explore that in this paper directly. Although I potentially explore it indirectly, to the extent that white parents can only make the decision to send their children to church schools because of school choice options.

<sup>21</sup> The work of Crespino (2007), Dowland (2015), and Winstead (2020) are exceptions.

<sup>22</sup> I specify evangelical schools because catholic parochial schools existed prior to any desegregation efforts and in some places, like Norfolk, were among the first schools to desegregate (Littlejohn and Ford, 2012, p. 54; *Yale Law Journal*, 1973, p. 1443).

the same purpose: to maintain white supremacy by avoiding desegregation (Winstead, 2020, p. 3). The history, however, is more complicated.

It is true that southern churches played an extensive role in maintaining resistance to desegregation (Harvey, 2016, p. 188; Littlejohn, 2012, p. 110; Winstead, 2020, p. 22). Even churches that did not create schools, indicated their approval of segregation academies by allowing those academies to use church buildings for classes (Carr, 2012; Fentress, 2020; Grady and Hoffman, 2018, p. 5; Littlejohn, 2012, p. 174). For example, in 1969, a federal court ruling prohibiting blatant segregation in Indianola Mississippi's public schools leading white parents to pull their students out of the public school and enroll them in Indianola Academy (Carr, 2012). Indianola Academy, founded in 1965, did not have the capacity to house all of the white public-school students and so the academy held classes on satellite campuses, one of which was "in a Baptist church" (Carr, 2012). In Prince Edward County, Virginia, where public schools were shut down for five years, white churches "offered the new Prince Edward Academy use of their buildings free of charge" (Titus, 2011, p. 34). Thus, it is no surprise that scholars conflate private Christian schools with segregation academies.

Further, the protection that church schools have under the First Amendment was not lost on the court, the public, or segregationists (*Runyon v. McCrary*, 1976, p. 167; see also Crespino, 2007, p. 9; Oelsner, 1976).<sup>23</sup> Indeed, it was not until 1983, in *Bob Jones University v. United States*, that the Supreme Court explicitly addresses racial discrimination in church schools.<sup>24</sup> *Bob Jones* is typically understood to prohibit church schools from participating in racial

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<sup>23</sup> I will explore the potential of this protection in current constitutional jurisprudence at greater length in Part II.

<sup>24</sup> The D.C. Circuit had previously addressed the question raised in *Bob Jones* (1983), in *Green v. Connally* (1971), putting the religious right on notice and resulting in a lot of church schools changing their admission requirements to allow Black students, but it was not until *Bob Jones* that the Supreme Court affirmed the D.C. circuit's reasoning. Crespino (2007, pp. 250-255) discusses the religious right leaders' reactions to *Connally* in great detail.

discrimination; however, the court actually just holds that the IRS' procedure, removing the tax-exempt status from any organization that racially discriminates, is not unconstitutional under the First Amendment. (*Bob Jones v. United States*, 1983, p. 585).<sup>25</sup>

In *Bob Jones*, the court is intentional about addressing the First Amendment question and only allows this restriction on Free Exercise because of the twenty-five years of prior Supreme Court decisions condemning racial segregation in education and the “myriad Acts of Congress and Executive Orders” against educational segregation, which together attest to a strong governmental interest in preventing racial discrimination in education (*Bob Jones v. United States*, 1983, pp. 593, 603-604). Meaning, at the time that the Supreme Court decided *Bob Jones*, it was clear that preventing an explicit policy of racial discrimination, through the taxing power, was a strong governmental interest outweighing First Amendment protections (*Bob Jones v. United States*, 1983, pp. 603-604). Yet, this requirement for a strong governmental interest, that relies on precedent and that complies with the political behavior of the time, suggests that whether the First Amendment protects the actions of a church school will be fact-specific and likely require explicit racial discrimination. Therefore, even in *Bob Jones*, the court reinforces the potential protections the First Amendment may afford church schools that uphold and incorporate a more subtle white supremacy.<sup>26</sup>

While the connection between segregation academies and church schools is readily apparent, it would be a mistake to conflate the two as one in the same (Dowland, 2015, p. 30).

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<sup>25</sup> See IRS Revenue Procedure 75-50 (1975) for the specific IRS rule that prohibits tax-exempt organizations from discriminating. The rule includes reporting requirements that requires organizations to report on its racial demographics and it includes a public-facing requirement that stipulates the anti-discriminatory nature of the organization. The IRS updated the public-facing requirement in 2019 to allow internet disclosures. (IRS Revenue Procedure 2019-22). It should also be noted that this decision has rarely ever been enforced to take away a church school's tax-exempt status (Crespino, 2007, p. 250; Dowland, 2015, p. 46)

<sup>26</sup> See Part II(B).

An adequate account of the complex social and historical context of the development of church schools is necessary to understand both the history and sustainability of these schools (Crespino 2007, p. 249; Winstead, 2020, p. 8). In contrast to segregation academies, the creation of church schools increased 137 percent between 1970 and 1980 (Dowland, 2015, p. 23). This increase is close enough to the creation of segregation academies to recognize the influence of desegregation in the creation of church schools; however, other changes to the school system contributed just as much to the creation of these schools— such as the perceived “secularization” of the public-school system by the Supreme Court.<sup>27</sup>

The Supreme Court’s decisions in *Engel v. Vitale* (1962) and *Sch. Dist. of Abington v. Schempp* (1963) encapsulated this perception of secularization (Dowland, 2015, p. 23).<sup>28</sup> In *Engel*, the court held that sectarian public-school prayer violated the Establishment clause of the First Amendment (*Engel v. Vitale*, 1962, p. 436). Likewise, in *Abington*, the court held that bible reading and the saying of the Lord’s prayer in public school violated the Establishment clause. (*Abington v. Schempp*, 1963, p. 223). In white conservative households, these two decisions amounted to an attack on core values and the Christian faith, which led to the creation of more church schools to combat the perceived secular indoctrination of white children (Dowland, 2015, p. 24).<sup>29</sup>

Additionally, in the late 1970s, conservative white Christians were uniting and mobilizing against several perceived culture wars such as abortion, gay rights, and the anti-ERA

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<sup>27</sup> Evangelical churches largely sponsored these schools, and as such, taught with a curriculum deeply rooted in evangelical theology (See Crespino, 2007, p. 249). In Part II, I will briefly reference the use of evangelical curriculum as an example of ways that these schools might be susceptible to indoctrinating students in cultural norms rooted in white supremacy.

<sup>28</sup> Dowland (2015, pp. 30-33) provides a detailed analysis on the impact these two cases had on white Christian parent’s view that public schools were too secularized.

<sup>29</sup> Interestingly, the same justices deciding these two cases also decided *Brown* (1954) and other pro-integration cases seen to be an attack on the white family and core values.

movement (Crespino, 2007, p. 13). This mobilization, commonly known as the rise of the religious right, was a movement against a perceived threat to the white Christian way of life – that included, but was not limited to, desegregation. This mix of values allowed for the rhetoric of the religious right to ignore its racist origins (Balmer, 2014; Rolph, 2018, p. 160) and instead bond evangelicalism with political conservatism (Dowland, 2015, p. 2).

Admittedly, segregationists were often the same people who were intimately involved in fighting these religious culture wars (Balmer, 2014; Kruse, 2015, pp. 203-205), which demonstrates how compatible the white supremacist agenda is with white Christians in America. Nevertheless, churches created church schools – as a byproduct of this movement – to provide white parents with an alternative to secular values.<sup>30</sup> The existence of alternative issues beyond desegregation allows these church schools to distinguish themselves from segregation academies – and they do (Crespino, 2007, p. 13, 249).

For these reasons, the conflation of church schools and segregation academies is problematic because such a definition would only capture a small number of church schools. As mentioned, church schools really increased in popularity in the late 1970s through the early 1990s, in part because of the Supreme Court’s decisions on prayer and religious teaching in public schools and in part because of the rise of the religious right.<sup>31</sup> In contrast, the term segregation academy refers specifically to schools founded between the 1960s and 1970s (Carr, 2012; Crespino, 2007, p. 9; Grady and Hoffman, 2018, p. 5; Porter et. al., 2014, p. 576; *Yale Law*

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<sup>30</sup> This fight against “secular values” in education continues as a narrative for supporting both church schools and homeschooling alternatives. See for example the upcoming evangelical movie, *God’s Not Dead 4: We The People*, a movie directed and produced by evangelical Christians, which centers around Christians defending their homeschooling curriculum from government officials (Null, 2021).

<sup>31</sup> This is likely the reason why Porter, Howell, and Hempel found that looking into church schools in their modern study of segregation academies, while valid, would render few samples (Porter et. al., 2014, p. 584)

*Journal*, 1973, p. 1444). Thus, conflating church schools with segregation academies allows these church schools to defend against any accusation of segregation by arguing that their existence is one rooted in theology, not white supremacy.

Finally, not taking church schools seriously, as distinct vehicles of white supremacy, significantly limits our understanding of the role that desegregation has played in the evolution and adaptation of white supremacy and religion in this country. This is especially true considering that by 1976, southern church schools outnumber the older segregation academies (Crespino, 2007, p. 249). It is significant, then, that church schools are distinguishable, even if by a little, from segregation academies. Especially, because if church schools go beyond the definition of segregation academies, then all church schools – not just those created in the 60s and 70s – can be considered in examining the evolution and adaptation of racism.<sup>32</sup>

## **PART II:** **Convergence of Purpose: Maintaining White Supremacy**

After *Bob Jones*, private segregation in education, whether housed in segregation academies or church schools, should have faced complete dissolution because the ability to exclude based on race was no longer legally available. And to the extent that the federal government now prohibits these schools from actively preventing Black student attendance, private segregation no longer *legally* exists. Legal prohibition, however, does not necessarily translate to real extinction when the underlying action – educational segregation – is understood for its true function: the maintenance and indoctrination of white supremacy.

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<sup>32</sup> Conservative white Christians take their faith seriously (Crespino, 2007, p. 277), which has severe implications for church schools that incorporate white supremacy, as it requires tackling racism backed by religious fervor.

After the Warren court made it no longer politically or socially acceptable to maintain white supremacy in public educational spaces, segregationists moved to private ones (*Brown v. Board of Education*, 1952, p. 495; see also *Yale Law Journal*, 1973, p. 1436). This strategy, however, became even more difficult once the Supreme Court extended its prohibition of educational segregation to private spaces (*Runyon v. McCrary*, 1976). Because of these Civil Rights Era decisions, segregationists needed to discover more subtle ways to maintain white supremacy in education. Accordingly, segregationists embraced the language and discourse of individual liberties, rights, and private property, as an alternative way to argue for ideas and policies that resulted in the continuation of white dominated spaces (Schmidt, 2016, pp. 189-190).

Schmidt (2016) suggests that this shift is politically and socially acceptable because it moves the conversation of civil rights “from a question of white supremacy versus equality toward a question of liberty verses equality.” (p. 190). Beyond the general political and social acceptability of this shift, the use of individual liberties and rights to legally argue for ideas and policies is also palatable to another group that white segregationists are often a part of – evangelical Christians.<sup>33</sup> Church schools, often founded and created by evangelical Christians, also rely on the language of individual liberty and rights to justify their existence (Crespino, 2007, p.4; Dowland, 2015, pp. 24-27). Thus, if the use of individual rights today provides an acceptable route for the work that segregated education accomplished in the past, then it is not incredibly difficult to imagine the maintenance of white supremacy has evolved as a convergence of purpose between segregation academies of the past and church schools of the

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<sup>33</sup> The compatibility of individualism to Christianity is not necessarily intrinsic to the Christian faith, instead it is a uniquely protestant concept – seen most regularly in southern evangelicalism – which allows southern evangelicalism to be so compatible with Americanism (Harvey, 2016, p. 45, 70).



present (Crespino, 2007, p. 4).<sup>34</sup> Contemporary church schools demonstrate this convergence of purpose by staying as segregated as legally possible under the Constitution, and most importantly, by having the unique ability to protect the purpose under the First Amendment religion clauses, preventing any future federal restrictions on pro-white subject matter indoctrination.

*A. Evolving the Purpose: Racial Realism & the Illusion of Integration*

The legal victories gained by Black people in the 1950s and 1960s, also brought forth a legal practice of political and racial conservatism that insisted on limits to antidiscrimination policies. (Schmidt, 2016, pp. 190-191). Central to the arguments of racial conservatism are concepts such as the “color-blind” interpretation of laws and “formal racial equality”, which focused more on eradicating explicit types of racism and ignoring more subtle forms (Crenshaw, Gotanda, Peller, and Thomas, 1995, p. xx). Once the Supreme Court started to reinforce these ideas in their legal jurisprudence (Crenshaw et. al, 1995, p. xxvii), the advancements obtained in the 1950s and 1960s began to stall, or in some cases, were reversed (Delgado & Stefancic, 2017, p.4).

Considering this delay and reversal of civil rights era victories, legal scholars – mostly of color – developed Critical Race Theory (“CRT”) to establish “new theories and strategies” needed to combat the more subtle forms of racism that emerged after the civil rights movement. (Delgado & Stefancic, 2017, p. 4). CRT shares an intellectual history with critical legal theory and the legal realist work of the 70s and 80s, in that, it relies on the assumption that the law is not neutral, objective, or apolitical (Crenshaw et. al., 1995, p. xviii). Yet, CRT is distinguishable in

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<sup>34</sup> The legal attack on church schools in *Bob Jones* did more than dismantle complete segregation, it also unified evangelical Christianity with segregationist and pushed white Christians to act more cohesively as a political body (Crespino, 2007, p. 13).

that it highlights the ways in which the law has constructed *race*, “not simply – or even primarily – a product of biased decision-making on the part of judges, but instead, the sum total of the pervasive ways in which law shapes and is shaped by race relations across the social plane” (Crenshaw et. al, 1995, p. xxv). Thus, at its core, CRT is an intellectual movement that attempts to critically ascertain the relationship between race, power, and the law, with the hope of “eliminating all forms of oppression” (Crenshaw et. al, 1995, p. xi; Donnor, 2016, pp. 350-351).

In this paper, I focus on two theories of CRT – racial realism and strategic racism. Derrick Bell (1991), an early pioneer of CRT, developed racial realism, a concept that acknowledges the permanent and evolutionary nature of racism in this country, but also frees Black people from the burden of seeking unobtainable equality. (pp. 373-74). Additionally, it helps put progressive success into context as “*short-lived victories that slide into irrelevance as racial patterns adapt in ways that maintain white dominance*” (Bell, 1991, p. 373) (italics in original). For this reason, racial realism is essential when looking at ways in which racism has become “more subtle though no less discriminatory,” (Bell, 1991, p. 373) because it understands that studying racism requires noticing the ways in which racism adapts and changes, while maintaining a “regime of white supremacy” that subordinates people of color (Crenshaw et. al, 1995, p. xiii).

Whereas racial realism provides a framework to notice subtle forms of racism, strategic racism provides a framework for understanding the way that subtle racism operates in a post-1964 world (Donnor, 2016, p. 351). Importantly, strategic racism – a term first established by Ian Haney Lopez (2014) – differs from traditional racism in that it is not “discrete acts of bigotry by malicious individuals” (p. 42). Instead, strategic racism operates as a manipulative and conscious plotting to gain or maintain white people’s “collective sociopolitical dominance” (Donnor, 2016,

p. 351; López, 2014, p. 46). As such, strategic racism is mostly about strategy and not necessarily intentional, malicious racial animus (although it can include individual racial animus); thus, it may operate outside of and in connection with other ways of maintaining power.

Tokenism, the presence of a few black individuals in a majority white space, is an example of strategic racism in the educational setting (Dorsen, 1967, p. 40; Dowland, 2015, p. 26). As complete segregation became legally impossible, white parents had to concede to at least the presence of some Black students (*Bob Jones v. United States*, 1983, p. 1983).<sup>35</sup> Generally, this resulted in most private schools, including church schools, strategically allowing a small portion of black students to enroll to avoid losing their federal tax exemption (Crespino, 2007, p.4, 11; Dorsen, 1967, p. 40; Dowland, 2015, p. 26). Tokenism thrives because while courts were adamant about desegregation in the legal sense, they were not as adamant about remedying racist realities (Dorsen, 1967, pp. 44-45). Meaning, that if private schools demonstrated that minority students attended their schools – even in a small number – then courts assumed that the school complies with *Runyon* (1976) and *Bob Jones* (1983), regardless of the school’s lack of affirmative recruiting or retaining of Black students or the school’s treatment of Black students. (Dowland, 2015, p. 26). Thus, tokenism allows private schools to strategically maintain their white racial dominance without any threat of actual integration.

For the purposes of this paper, I define actual integration as a school composition reflective of the city that the school is located in.<sup>36</sup> Grady and Hoffman (2018) found that

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<sup>35</sup> Interestingly, as early as 1973, white parents were demonstrating acceptance of sending their kids to schools with a small number of Black students so long as the school was not genuinely integrated (*Yale Law Journal*, 1973, p. 1441).

<sup>36</sup> I recognize that city population is not a perfect model for this project because not everyone in a city will identify as religious or even consider sending their children to religious schools. However, even though church schools are religious, that is not the only reason a parent might rely on when using their right to send their child to a church school. As noted by Grady & Hoffman (2018), there are a variety of reasons a parent might use their right to choose a school other than the public school (pp. 11-17). As all parents in a city technically have the right to participate in

“private school students are more likely to be white” (p. 17). While Grady and Hoffman are not limiting their work to church schools, they do not – unlike Porter et. al. (2014, p. 584) – explicitly exclude church schools from their study either, suggesting that like other private schools, church school students are also more likely to be white. Therefore, it is not irrational to hypothesize that a case study of contemporary Virginia church schools will display an illusion of integration that sufficiently protect against legal claims.

In order to examine this hypothesis, I examined two schools located in Norfolk and Portsmouth, Virginia: Norfolk Christian and Portsmouth Christian.<sup>37</sup> I chose these two schools as case studies because of the former’s proximity to the location of one of Virginia’s most intense demonstrations of Massive Resistance and the latter’s intimate connection to this project.<sup>38</sup> The two schools are good samples because both are located in cities with a large minority population (See Tables 1 and 2).

Pastor John Dunlap founded Norfolk Christian, a non-denominational church school, in 1952 (Norfolk Christian Schools, n.d., para. 1), before *Brown* (1954). While Biltmore Baptist and Pastor T.M. Frye founded Portsmouth Christian in 1965 (PCS, 2018), during Massive Resistance, but after the Supreme Court’s major religious education decisions, *Engel* (1962) and *Abington* (1963). Placing both schools in the position to distance themselves from traditional segregation academies.

For this case study, I relied heavily on the National Center for Education Statistics’ Private School Universe Survey (“PSS”) (National Center for Education Statistics [NCES], n.d.,

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school choice, I think that looking at the entire city demographic is appropriate to determine the level of integration in a particular church school.

<sup>37</sup> With more time, this study could be expanded to look at the demographics of all of church schools located in Virginia, but that was unsustainable for the timing of this project.

<sup>38</sup> Portsmouth Christian is the private church school that I attended for 10 years (First grade – Tenth Grade).

Search for Private Schools) and their Education Demographic and Geographic Estimates (“EDGE”) (NCES, n.d., ACS-ED) for the church school’s demographics and the data of public schools in the same city. Although it is not mandatory for private schools to participate in NCES’ private school survey, the survey has been around since 1988 and is the most comprehensive survey of private school information. (U.S. Census Bureau, n.d., para. 1 and “Is Participation Mandatory” Section). Similarly, the EDGE database collects data from the U.S. Census Bureau along with spatial data from other NCES databases to provide comprehensive analysis of demographic, geographic, and economic data for U.S. school children (NCES, n.d., About). Additionally, I used the United States Census Bureau’s 2014-2018 American Community Survey (“ACS”) to determine the racial demographics of Norfolk and Portsmouth, Virginia (U.S. Census Bureau, n.d.).<sup>39</sup> Lastly, the results focus only on white and Black students because this project’s foundation is in the history and lessons of white/Black segregation in the South.<sup>40</sup>

<b>Table 1. Norfolk Case Study</b>	<b>White</b>	<b>Black</b>
<i>City’s Racial Demographic</i>	47%	41.6%
<i>City’s Public-School Racial Demographic</i>	44%	41%
<i>Norfolk Christian School’s Racial Demographic</i>	75.07%	16.8%

<sup>39</sup> The most recent census data comes from 2019, but I chose to use the 2014-2018 data to make it compatible with the NCES Survey data, which covers the 2017-2018 school year (NCES, n.d., Search for Private Schools).

<sup>40</sup> I understand that this places this project squarely within the Black/white Binary and limits its reach to other marginalized students of color who may attend these church schools. Future research should include and explore the role that other marginalized groups play in the church school movement.

<b>Table 2.</b> Portsmouth Case Study	<b>White</b>	<b>Black</b>
<i>City's Racial Demographic</i>	40.2%	52.7%
<i>City's Public-School Racial Demographic</i>	38%	52%
<i>Portsmouth Christian School's Racial Demographic</i>	70%	21.9%

These two schools, while not a complete sample of Virginia church schools, provide a small example of the convergence of purpose between church schools and traditional segregation academies in the modern era. The schools remain predominately white in cities that are no longer majority white, and in the case of Portsmouth – a majority Black city (See Table 2).

Additionally, the data demonstrates that the public schools are closer to reflecting the true makeup of the city's racial demographic, suggesting true integration. In contrast, the church schools remain heavily white with only a token number of Black students, confirming an illusion of true integration. For example, in Portsmouth the majority of residents are Black; yet white students make up 70% of the student population at PCS. (See Table 2). In Norfolk, the difference is even more straightforward, with Black residents making up 41% of the population, but only 16% of Norfolk Christian's student population. Neither of these schools would be susceptible to a formal challenge of segregation, due to the existence of Black students, but their majority white composition does not reflect their city's composition. Thus, these two church schools maintain the vestiges of a segregated purpose – and by extension white supremacy.

Admittedly, the presence of Black students requires any accusation of white supremacy based on segregation to be based on more subtle and less direct separation. This is because traditionally, desegregation has been thought of as the solution to the ills of segregated

classrooms (Champagne, 1973, p.60). As these two schools demonstrate, however, a school does not need to have complete segregation to maintain a classroom that is overwhelmingly situated in whiteness. For in both schools, white and Black students still exist in an overwhelmingly white space (See Tables 1 and 2). Therefore, as racial realism emphasizes, such strategic and subtle forms of white supremacy are “no less discriminatory” (Bell, 1991). In fact, I would argue that this more subtle adaptation of white supremacy is harder to dismantle than complete segregation because the subtle adaptation appears to comply with integration. Thus, white people can defend these subtle forms of white supremacy with race-neutral terms – such as “freedom of choice” and “free exercise of religion” discourse.<sup>41</sup> This is especially true when white supremacy converges with religion, because then whiteness becomes sacred allowing its white people to protect it with a religious fervor.<sup>42</sup>

### *B. Protecting the Purpose: Strategic Racism & First Amendment Protections*

While all private schools can use the strategy of tokenism to maintain white supremacy in their schools, church schools have an additional strategy rooted in the First Amendment.<sup>43</sup> The First Amendment prohibits congress from making any law that would affect the free exercise of religion (U.S. Const. amend. I). Thus, because church schools are religious institutions, they fall under the protection of the First Amendment (*Wisconsin v. Yoder*, 1972, p.214).<sup>44</sup>

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<sup>41</sup> It is no surprise then, that some scholars have argued that white supremacy “was reborn in the civil rights era, not irreparably weakened.” (Rolph, 2016, p. 6).

<sup>42</sup> Harvey (2016) discusses how whiteness becomes sacred in the South through Christianity in, *Christianity and Race in the American South*. (pp.118-152).

<sup>43</sup> For example, the court in *Runyon v. McCrary* (1976), which required desegregation in private nonsectarian schools, specifically indicated that the question of “private sectarian schools that practice racial exclusion on religious grounds” was not raised and they chose not to answer that question in this case (p.167). Additionally, in the 1970s, some segregated private academies thought that the First Amendment would protect them from losing their tax exemptions (Crespino, 2007, p. 9).

<sup>44</sup>For example, in *Bob Jones*, the court specifically addressed a First Amendment question because of Bob Jones’ religious affiliation. (*Bob Jones v. University*, 1983, pp. 603-605).

Famously, the Supreme Court first addressed the connection between a state's interest in education and the fundamental rights inherent in the First Amendment clauses, in *Wisconsin v. Yoder* (1972). In *Yoder*, the court held that a balancing test between these two interests are necessary when it comes to the parental right to govern “the religious upbringing of their children” (*Wisconsin v. Yoder*, 1972, p. 214).<sup>45</sup> For this reason, some segregationists thought that the First Amendment would protect them from the desegregation requirements given in *Runyon* (1976), if they converted their schools to church schools (Crespino, 2007, p.9). Notably, this strategy failed to work because in *Bob Jones* (1983) the court held that the federal government could manipulate religious schools into prohibiting racial discrimination in admissions and in policies, without violating the First Amendment.

*Bob Jones* (1983), however, does not render this strategy moot. For even when the court has decided to impose restrictions on Free Exercise in religious schools because of racial discrimination, a balancing test is still in play. (*Bob Jones University v. United States*, 1983, p. 603). Courts use balancing tests when one constitutionally protected right places a burden on the exercise of another constitutionally protected right – in this case racial discrimination and religious liberty (*Bob Jones v. United States*, 1983, p.603-604). In *Bob Jones*, the burden placed on religious liberty by removing tax exempt status from schools with racially discriminatory admission policies was outweighed by the government's interest in “eradicating racial discrimination in education” (*Bob Jones v. United States*, 1983, p.604). Indicating that the strength or weakness of First Amendment protections, by religious schools, depends on how the specific court balances the interests presented. The current court's religious school funding cases

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<sup>45</sup> The court limited the preference for religious free exercises in this balancing test in *Employment Div. v. Smith* (1990), but it was later resurrected by congress' passing of the Religious Freedom Restoration Act (“RFRA”) (*Holt v. Hobbs*, 2015)



insinuate that it is strongly invested in protecting the interests of religious institutions under the First Amendment.

Although not related to racial animus or discrimination, the courts most recent decisions in *Espinoza v. Montana Department of Revenue* (2020) and *Trinity Lutheran v. Comer* (2017), provide evidence of the court’s impetus to support religious claims under the First Amendment.<sup>46</sup> In both cases, the majority opinions apply the strict scrutiny standard to laws that “discriminate” against religious educational institutions. Strict scrutiny means that the Court will protect the religious interest unless the government has an overwhelmingly high interest that justifies burdening religious free exercise – typically, laws decided under this standard are found to be unconstitutional (*Trinity Lutheran v. Comer*, 2017, p. 2019). Specifically, in *Trinity Lutheran* the Court held that Missouri could not prevent Trinity Lutheran from applying for a government public benefit program for schools and daycares, simply because they were a church (*Trinity Lutheran v. Comer*, 2017, p. 2024). Likewise, and relying on *Trinity Lutheran*, the Court in *Espinoza* held that Montana’s decision to prevent state scholarship aid from being used at church schools unconstitutionally burdened “religious schools” and also “the families whose children attend or hope to attend them” (*Espinoza v. Montana*, 2020, p. 2261). These decisions indicate that the First Amendment protection for church schools, curbed in *Bob Jones*, is not moot. On the contrary, such claims seem to be endorsed by the current Court.<sup>47</sup>

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<sup>46</sup> For the purposes of this paper, I am saying that these decisions are not related to racial animus or discrimination. Minow (2011), in her study on school choice, however, suggests that these kinds of cases have racial consequences because they authorize “pluralism and diversion from the common school” without benefitting the most disadvantaged students (p. 843).

<sup>47</sup> The Court is currently considering the same issue in *Carson v. Makin* (Docket No. 20-1088, 2021). This decision like *Espinoza* and *Trinity Lutheran* will reveal how far the current Court is willing to go to protect religious freedom in the realm of education. (*Carson v. Matkin*, Docket No. 20-1088, 2021).

Thus, the ability of white supremacy to be preserved and maintained in church schools is of special importance considering the current Court's inclination to find in favor of religious liberty when balancing rights under the constitution. Strategically, church schools present a loophole for resisting constitutional challenges to white supremacy in education. Yet, because this is a more subtle form of white supremacy not expressed in racial terms, it is unlikely that this loophole would arise in the context of legal claims to re-segregate schools or to maintain explicitly racist policies. Instead, such protections will mostly likely be successful in challenges to school choice strategies and church school curriculums.<sup>48</sup>

As early as *Brown* (1954), the court recognized that “awakening [a] child to cultural values,” is a principal function of education (p. 493). Even though this recognition was the foundation of desegregation, the court later explicitly held that, in private schools, “it may be assumed that parents have a First Amendment right to send their children to educational institutions that promote the belief that racial segregation is desirable” (*Runyon*, 1976, p.176). This assumption balanced with racial exclusion resulted in the court buttressing a peculiar position: curriculum that upheld white supremacy based cultural values is acceptable under the constitution so long as the school teaching such curriculum does not exclude students based on race. (*Runyon*, 1976, p. 176).

Dowland (2015) describes evangelical church schools as uniquely situated to teach nationalism and American exceptionalism because in order to support a theory of a Christian

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<sup>48</sup> Unfortunately, this project will not go into detail about the current nature of church school curriculum. Instead, however, I will just briefly point out examples of ways in which curriculum may become a contentious battle in the future for church schools. Future research should expand upon this point and investigate the specific details of church school curriculum.

America, they must “establish that America possessed religious foundations” (p. 26).<sup>49</sup>

Additionally, these schools rely on textbooks – with few minority authors – that uphold what is considered “traditional [American] values” (Dowland, 2015, p. 26). Curriculums that preserve American nationalism and exceptionalism, along with traditional values, might serve the theological purpose of connecting Christianity to America’s founding (Dowland, 2015, pp. 39-40). However, it also serves the strategic purpose of maintaining a vision of America that is rooted in whiteness and dominance.<sup>50</sup> The end goal being to indoctrinate new generations of students, both white and Black, with the cultural values of White supremacy. In this sense, the peculiar position the court highlighted in *Runyon*, fits perfectly as an example of racial realism (1976, p.176). In that, the Court encourages white supremacy to evolve in a way that is seemingly equal: Black students are also being indoctrinated with curriculum that upholds white dominance.

Interestingly, this position was the result of the court applying the First Amendment’s Freedom of Association clause and not its Free Exercise clause. Yet, as previously demonstrated, church schools have the unique additional use of the Free Exercise clause. Meaning that any attempt to question or challenge contemporary church schools’ curriculum or dogma as racially discriminatory would face an opponent equipped with the Freedom of Association clause on the one hand, and the Free Exercise on the other – creating a two to one odds of winning for the church school faced with a constitutional challenge.

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<sup>49</sup> For example, Lynchburg Academy, a Virginia church school that originated as a segregation academy, included strong patriotic language in their original pamphlets – such as, “Patriotism is a part of our program. Our students are taught to love this great nation and to respect her. We have never had an anti-American demonstration” (Dowland, 2015, p.27).

<sup>50</sup> This is not a new way of preserving white supremacy. In fact, Fuquay (2002) states that one of the main reasons for creating private segregated academies was to protect against the “federal government us[ing] the schools to promote alternative values” (p. 160).

## CONCLUSION

The relationship that contemporary church schools have to white supremacy goes beyond the mere categorization of a “segregation academy.” In fact, because most contemporary church schools can dispute a segregation academy classification, they are uniquely situated to preserve a more subtle and less direct white supremacy without serious criticism. These schools demonstrate this relationship with white supremacy by using racial tokenism strategically to maintain an illusion of integration. This illusion satisfies legal suspicion, while also remaining palatable to white parents desperate to keep the exclusionary nature of whiteness.

Additionally, the strategy of using church schools to maintain white supremacy is efficient because churches, and no other private schools, have the explicit constitutional protection of the First Amendment’s religion clauses. These clauses provide a safe space for church schools to teach curriculum that highlights the role of whiteness and dominance in American history without any contradiction.<sup>51</sup> Therefore, church schools continue to exist as predominately white institutions, which can teach whiteness in the classroom, while also relying on the protections of the First Amendment, demonstrates the ways in which these schools continue to awaken students to cultural values rooted in white supremacy. A reminder that a more subtle form of white supremacy is still white supremacy, seeking to maintain white dominance in America and especially in education, “the very foundation of good citizenship” (Brown, 1954, p. 493).

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<sup>51</sup> Although not covered in this project, it would be interesting to compare/contrast the current 1619 project with the curriculum taught at church schools. (Pulitzer Center, n.d.). This curriculum is controversial in general, but any acceptance of it in the public-school system would be unenforceable in most private schools, with church schools having the strongest claim against any mandatory adoption.

Recognizing that this more subtle form of white supremacy is still no less discriminatory, it would be interesting to explore the impact that church schools have on the cultural and societal development of Black students. As mentioned, because of tokenism, Black students attend church schools in small numbers. Therefore, in part two to this project I plan to explore the memories of the Black students that attended these schools, through interviews.

These interviews will be designed to determine (1) what influence, if any, these church schools had in the cultural development of Black students and (2) to what extent, if any, were these students impacted by white supremacy while attending these schools – either at the time of attendance or later. To create cohesiveness between the memory project and this current project, I will attempt to limit the interviewees to Black students who attended Norfolk or Portsmouth Christian schools. Hopefully, the combination of both projects will provide a more comprehensive view (theoretical and practical) of the relationship between white supremacy and church schools.

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**The Trauma of Tokenism:**

**Desegregation, Memory, and White Supremacy in Contemporary Church Schools**

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## INTRODUCTION

In 2008, on the day that Americans elected their first Black president of the United States, I remember going to school excited and coming home confused. While America had elected its first Black President, a historic moment that had implications for all of America – both Black and white – the Black students at Portsmouth Christian School (“PCS”), preserved the day of the election in their memory for reasons not associated with the celebration of a historical moment.<sup>1</sup> Instead, the memory reminds them of a day where their identity as Black students resulted in a racially traumatic experience. This collective memory and others like it express the difference of experiences in church schools for Black students versus their white counterparts due to being a numerical minority in a majority white space, created and maintained by white supremacy.<sup>2</sup> This disparity in experience, subsequently defined as tokenism – sets the framework for this project.<sup>3</sup>

As a former student of PCS, I understand and appreciate the experience of tokenism firsthand. Throughout my primary and secondary education, I was consistently one of few Black students in my class, on my sport teams, and in the school. My private church school was not

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<sup>1</sup> See Zoom Interview with Subject E, PCS Alumnus (Feb. 20, 2021); Zoom Interview with Subjects F and G, PCS Alumni (Feb. 21, 2021); Zoom Interview with Subject J, PCS Alumnus (March 3, 2021) (for memories of the 2008 election by Black students at PCS).

<sup>2</sup> For the purposes of this paper, “white supremacy” is defined as a multi-dimensional system of power defined by the elevation of whiteness and the subordination of Blackness, which can be operationalized – both consciously and unconsciously – in culture, economics, politics, policy, law, and religion. See Charles W. Mills, *White Supremacy as Sociopolitical System: A Philosophical Perspective*, in *WHITE OUT: CONTINUING SIGNIFICANCE OF RACISM* 42- 47 (Asley W. Doane and Eduardo Bonilla-Sliva, ed. 2003); see also Cheryl Harris, *Whiteness as Property*, 106 Harv. L. Rev. 1709, 1736.

<sup>3</sup> All references to tokenism in this project refer to the sociological concept created by Rosabeth Moss Kanter. See ROSABETH MOSS KANTER, *MEN AND WOMEN OF CORPORATION 6* (1977). Kanter’s work and the literature that flows from it deals almost exclusively with tokenism in the workplace. See, e.g. Hilton Kelly, *Racial Tokenism in the Workplace: An Exploratory Study of Black Teachers in Overwhelmingly White Schools*, 41 EDUC. STUD. 230 (2007); Eden B. King et al, *Understanding Tokenism: Antecedents and Consequences of a Psychological Climate on Gender Equity*, 36 J. OF MGMT. 482 (2010); Eve Spangler et al., *Token Women: An Empirical Test of Kanter’s Hypothesis*, 84 AMERICAN J. SOC. 160 (1978); Catherine J. Turco, *Cultural Foundations of Tokenism: Evidence from the Leveraged Buyout Industry*, 75 AMERICAN SOC. REV. 894 (2010). However, even in that literature, scholars have noted that the theory may be able to be extended to other contexts outside of employment. See Turco, *supra*, at 907.

unique in this phenomenon, one could also observe such small numbers of Black and Brown students at other Christian schools in the area.<sup>4</sup>

Biltmore Baptist Church founded PCS in 1965; during the time that Virginia’s public schools were fighting – alongside the rest of the South – the implementation of the Supreme Court’s 1954 decision, *Brown v. Board of Education*, which prohibited segregated classrooms.<sup>5</sup> This time period, otherwise known as the time of “Massive Resistance,” includes the strategies, litigation, and conflicts used by segregationists to prevent the desegregation of public schools.<sup>6</sup> Scholars often treat private church schools created during this time – like PCS – as products of this resistance.<sup>7</sup>

In prior work, I have argued that church schools, regardless of their designation as a segregation academy or not,<sup>8</sup> currently incorporate white supremacy by persistently maintaining mostly segregated spaces.<sup>9</sup> I use the term mostly segregated because these schools typically do have a small number of Black or Brown students in attendance, avoiding charges of explicit segregation, which the Supreme Court prohibited for religious educational institutions in 1983.<sup>10</sup>

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<sup>4</sup> See, e.g., the comparison in demographics for Portsmouth Christian and Norfolk Christian in Vania Blaiklock, A Convergence of Purpose: Segregation and White Supremacy in Contemporary Church Schools (Nov. 16, 2020) (unpublished M.A. Thesis, Essay #1) (on file with author). This is not exclusive to Hampton Roads, but is prominent in Christian church schools nationwide, especially in the southern region. See Jongyeon Ee et al., *Private Schools in American Education: A Small Sector Still Lagging in Diversity* 1-46 (UCLA Civil Rights Project, Working Paper, 2018), <http://escholarship.org/uc/item/6213b2n5>.

<sup>5</sup> 347 U.S. 483 (1954). For information on the founding of Portsmouth Christian School see PORTSMOUTH CHRISTIAN SCHOOLS, *About*, <https://www.portsmouthchristian.org/about/> (last visited Apr. 28, 2021).

<sup>6</sup> See Anthony M. Champagne, *The Segregation Academy and the Law*, 42 J. of Negro Educ. 58, 60 (1973). I will cover Virginia-specific examples of massive resistance in more detail in Part I, see *infra* Part I.

<sup>7</sup> See, e.g., Porter et al., *Old Times are Not Forgotten: The Institutionalization of Segregationist Academies in the American South*, 61 Soc. Problems 576, 584 (2014). But see Rachel Winstead, *Basements Below the Sanctuary: A Story of the Church School* (May 9, 2020) (unpublished Honors Thesis, Sally McDonnell Barksdale Honors College) (on file with egrove, Ole Miss) for an example of scholarship that distinguishes segregation academies and private Christian church schools.

<sup>8</sup> For the purposes of this paper, “segregation academies” are defined as those private schools explicitly created in the 1960s and 1970s to avoid desegregation. See *infra* note 33 and accompanying text.

<sup>9</sup> See Blaiklock, *supra* note 4, at 4-5.

<sup>10</sup> See *Bob Jones v. University*, 461 U.S. 574 (1983). The Supreme Court ordered Private schools, in general, to desegregate seven years earlier in *Runyon v. McCrary*, but until *Bob Jones*, it was unclear whether the *Runyon* ruling would encompass religiously affiliated schools. 427 U.S. 160 (1976).

While current scholarship is plentiful on the creation and legal desegregation of private schools – and by extension, private church schools – there is very little scholarship examining the experience of Black students who facilitated and continue to facilitate that desegregation.<sup>11</sup>

For this reason, I designed the current pilot study interviewing Black students who attended PCS, from the 1980s until 2010s, about their experience as Black students in a private church school.<sup>12</sup> This pilot study contributes to the literature by revealing how memory can help explain desegregation beyond admission numbers through the revelation of tokenism as a counter-narrative.<sup>13</sup> In terms of this project, memory refers to the individual experiences shared by Black students, which when taken together, collectively reveal the social and group perspective of token Black students at PCS.<sup>14</sup> It is my objective to demonstrate that memory – specifically the racially traumatic memories of these Black students – allows scholars to expand Kanter’s 1977 theory of tokenism to the context of Black church school students, disrupting the traditional legal narrative that court-ordered desegregation sufficiently eliminated the influence

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<sup>11</sup> See Justin R. Mallet, *Kanter’s Theory of Tokenism and the Socialization of African American Studies Attending Midwestern University* 11 (Dec. 2012) (unpublished Ed.D. Dissertation, Edgewood College) (recognizing that scholarship on the use of “Kanter’s theory of tokenism to apply to African American students within an educational setting...is currently not available”). Mallet’s work does focus on tokenism and African American education but is distinguishable from my work because he focuses exclusively on public college education and not private schools or secondary education. One other exception is Karida Brown’s work on the cultural trauma of school desegregation. See Karida Brown, *The ‘Hidden Injuries’ of School Desegregation: Cultural Trauma and Transforming African American Identities*, 4 AMERICAN J. OF CULTURAL SOC. 196 (2016). Brown’s work is distinguishable from mine in three ways: (1) she does not explicitly analyze tokenism; (2) her work looks only at Black students who desegregated public schools during the Civil Rights Movement and not private schools and (3) she limits her work only to those experiences connected to the early days of desegregation. *Id.* I, however, focus exclusively on Black students who desegregate/attend private church schools and my work is not limited to the early days of desegregation, focusing instead on Black experiences from the 1980s up until the present.

<sup>12</sup> I understand that the findings of this study will be objectionable due to the small number of interviewees and because all interviewees attended the same church school. As a pilot study, however, it demonstrates that there is a connection to explored in this area and that future studies should test my arguments by expanding the study. See *infra* Part II, section III. It is my hope that my work will eventually be able to expand this study, but due to time constraints, the arguments in this paper will be limited to the experiences of the eleven students interviewed.

<sup>13</sup> For the purposes of this paper, the term “counter-narrative” refers to the narratives or memories that challenge and oppose institutionalized or official memories. See *infra* notes 134-141 and accompanying text.

<sup>14</sup> For a more detailed definition of how the term “memory” is understood in this essay, see *infra* notes 114-119 and accompanying text.

of white supremacy in these schools.<sup>15</sup> Additionally, I will argue that this counter-narrative of tokenism is a source of cultural trauma for these Black students.<sup>16</sup>

Thus, the paper is separated into three parts. In Part I, I will describe: (1) briefly the history of Massive Resistance – focusing primarily on Virginia – and the creation of these church schools and (2) how litigation led to their desegregation. In Part II, I will argue that the use of collective memory is necessary to reveal a counter-narrative of tokenism; thereby, extending tokenism theory to the context of church school desegregation. Finally, in Part III, I will argue that the existence of tokenism in this context is a source of cultural trauma for these Black students - a veiled consequence of the influence of white supremacy in church schools.

Lastly, when one of the interviewee's reflected on Obama's election she stated, "Our white counterparts were pissed. Teachers, administration, students all had this look on their face in like complete disgust."<sup>17</sup> Whereas my family seemed to suggest that collectively the nation had made a major step in the direction of equality, at school the atmosphere indicated that something had died. In hindsight, I am inclined to believe that something *did* die in that moment – the fragile belief that the legal advancements of the Civil Rights era fundamentally changed the operations of white supremacy.<sup>18</sup> It is my hope that by demonstrating the limitations of legal remedies, such as desegregation, this study provides a concrete example of the role that memory

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<sup>15</sup> See, generally, Kanter, *supra* note 3. It should also be noted that objections to desegregation in general do exist and existed even at the time of the Civil Rights movement. See Vanessa Siddle Walker, *School "Outer-gration" and "Tokenism": Segregated Black Educators Critique the Promise of Education Reform in the Civil Rights Act of 1964*, 84 J. OF NEGRO EDUC. 111 (2015). However, these objections explore cultural and psychological issues with integration in public schools and are beyond the scope of this project since desegregation is and has been the law of the land for over 60 years (even if not fully implemented).

<sup>16</sup> For the purposes of this paper, "cultural trauma" is defined as the psychological marks or changes imparted on a collective group through shared experiences of trauma, in this case racial trauma. For a more comprehensive definition see *infra* notes 222-229 and accompanying text.

<sup>17</sup> See Subjects F&G, *supra* note 1, at 28:22.

<sup>18</sup> See Kelly, *supra* note 3, for an explanation of the key assumptions of traditional civil rights ideology and beliefs.



can play and continues to play in our understanding of white supremacy and the way that it evolves and adapts.<sup>19</sup>

## **PART I:**

### **The Official Legal Narrative - Desegregation and the End of Segregated Private Schools**

#### ***I. Brown and Virginia's Massive Resistance***

For almost seventy years, scholars, news reporters, and the public at large have described *Brown v. Board of Education* as the landmark decision of the United States Supreme Court's jurisprudence.<sup>20</sup> The plethora of court decisions and legal and public scholarship that flow from *Brown* support the conclusion that the case indeed marked an important stage in not only Supreme Court jurisprudence, but also in American culture.<sup>21</sup> *Brown's* landmark status inevitably comes from the fact that in deciding the case, the Court endeavored to tackle the problem of segregated educational facilities, a problem that had been brewing since the end of the Civil War.<sup>22</sup>

In an audacious move, the Court overturned its prior decision, *Plessy v. Ferguson*, which allowed for segregated spaces under the pretense that facilities separated by race could also be equal, and instead held that “in the field of public education the doctrine of ‘separate but equal’ ha[d] no place.”<sup>23</sup> However bold this decision appeared, the Court immediately weakened *Brown's* power by declaring – a year later – that states must enforce the decision with “all

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<sup>19</sup> For more on the evolutionary nature of white supremacy, see Derrick Bell, *Racial Realism*, 24 CONN. L. REV. 363, 378 (1991).

<sup>20</sup> 347 U.S. 483 (1954).

<sup>21</sup> See, e.g., MICHAEL J. KLARMAN, FROM JIM CROW TO CIVIL RIGHTS: THE SUPREME COURT AND THE STRUGGLE FOR RACIAL EQUALITY (2004). For legal and public scholarship that rely on *Brown* as a cultural landmark see SHERYLL CASHIN, THE FAILURES OF INTEGRATION: HOW RACE AND CLASS ARE UNDERMINING THE AMERICAN DREAM; see also CAMILLE WALSH, RACIAL TAXATION: SCHOOLS, SEGREGATION, AND TAXPAYER CITIZENSHIP, 1869-1973 (2018).

<sup>22</sup> For a detailed description of the state of Black public education from the end of the Civil War up until the *Brown* decision see JAMES D. ANDERSON, THE EDUCATION OF BLACKS IN THE SOUTH, 1860-1935 (1988).

<sup>23</sup> See *Brown*, 347 U.S. at 495. See *Plessy v. Ferguson*, 163 U.S. 537 (1896) (for the precedent of “separate but equal”).

deliberate speed,” but with no concrete guidelines.<sup>24</sup> Regardless of the Court’s intention, such language facilitated an intense period of backlash and defiance, known in the literature as a time of “Massive Resistance.”<sup>25</sup>

In Southern states, this resistance took a variety of forms, from school closure and privatization to the passing of laws that criminalized integrated schools at the state level.<sup>26</sup> At all levels, white citizens met any effort to truly integrate with violence and outrage.<sup>27</sup> In Virginia, specifically, the state government immediately sought to thwart desegregation by authorizing the governor to “close or cease funding integrated schools.”<sup>28</sup> In some areas, such as Norfolk and Prince Edward County, Virginia, this meant that the school systems were shut down in their entirety to avoid desegregation.<sup>29</sup>

Yet, during this time of resistance, states provided privatized segregated education to white students – including poor white students.<sup>30</sup> Privatized schooling was an ideal loophole for white parents and school boards because the Court exclusively limited *Brown* to the “field of

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<sup>24</sup> *Brown v. Board of Education II*, 349 U.S. 294 (1955).

<sup>25</sup> See Champagne, *supra* note 6, at 60. This resistance effectively kept Black children attending segregated schools – at levels greater than those in 1954 – until the late 60s, early 70s. See Norman Dorsen, *Racial Discrimination in “Private” Schools*, 9 W&M L. REV. 39, 40 fn.3 (1967).

<sup>26</sup> See, generally, Champagne, *supra* note 6, at 60-66; see also *Segregation Academies and State Action*, 82 YALE L.J. 1436, 1438 (1973) (for violent resistance and privatization) [hereinafter “Segregation Academies”]. For specific examples of states shutting down schools and passing criminalization laws see generally JEFFREY L. LITTLEJOHN AND CHARLES H. FORD, *ELUSIVE EQUALITY* (2012); see also *Segregation Academies, supra*, at 1437.

<sup>27</sup> See Champagne, *supra* note 6, at 60; see also *Segregation Academies, supra* note 26, at 1437.

<sup>28</sup> See *Segregation Academies, supra* note 26, at 1437; see also *Griffin v. County School Board*, 377 U.S. 218, 221 (1964); NOLIWE M. ROOKS, *CUTTING SCHOOL: PRIVATIZATION, SEGREGATION, AND THE END OF PUBLIC EDUCATION* 81 (2017) (for the idea that this plan to resist *Brown* was shared by almost all of the Southern democrats in the United States congress).

<sup>29</sup> See Littlejohn and Ford, *supra* note 26, at 78-79; see also, JILL OGLINE TITUS, *BROWN’S BATTLEGROUND: STUDENTS, SEGREGATIONISTS, AND THE STRUGGLE FOR JUSTICE IN PRINCE EDWARD COUNTY, VIRGINIA* (2011) (for a comprehensive overview of Prince Edward County’s debacle).

<sup>30</sup> See Champagne, *supra* note 6, at 66; see also *Segregated Academies, supra* note 26, at 1438. In Virginia specifically, poorer white parents were given tuition grants – that were later found unconstitutional – to help assist them in sending their children to private schools. See Dorsen, *supra* note 25, at 42-43; see also *Griffin v. State Board of Education*, 296 F. Supp. 1178 (E.D. Va. 1969) (for the decision holding that these tuition grants were unconstitutionally assisting a “racially segregated education”).

public education.”<sup>31</sup> These private schools would come to be described as “segregation academies” a term applying exclusively to private schools created in the South, for the purpose of maintaining segregation, between the 1960s and 1970s.<sup>32</sup> The increase in private church schools<sup>33</sup> overlaps with the founding of segregation academies.<sup>34</sup> Distinguishing between private segregated academies and private church schools, however, is necessary to help one understand how the Court ultimately desegregated both types of schools.

## ***II. Private Schools and Legal Desegregation Intervention***

As mentioned, *Brown* only applied to public school education. Leaving, at least theoretically, both segregated academies and private church schools to legally deny admission to Black students based on their race. In practice, private school discrimination remained an available vehicle for segregation until 1976 when the Supreme Court decided *Runyon v. McCrary* – over twenty years after the *Brown* decisions.<sup>35</sup> Unlike *Brown*, where the Court relied on psychological principles and the Fourteenth Amendment, *Runyon v. McCrary* – the decision desegregating private educational institutions – relied on section 1981 of the Civil Rights Act of 1866 and reasonable government regulations.<sup>36</sup> Yet, it was unclear whether or not the decision, which applied to segregation academies, extended to church schools – because the question of discrimination on religious grounds was not presented.<sup>37</sup>

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<sup>31</sup> *Brown v. Board of Education*, 347 U.S. 483 (1954).

<sup>32</sup> See Champagne, *supra* note 6, at 58; see also Porter et al., *supra* note 7, at 578.

<sup>33</sup> For the purposes of this paper, the term “church schools” refers specifically to evangelical and mainline protestant Christian schools. Catholic schools or parochial schools are not included because at the time of *Brown*, at least in the South, they were among the first to desegregate. See Littlejohn and Ford, *supra* note 26, at 54; see also Segregated Academies, *supra* note 26, at 1443; but see Walsh, *supra* note 21, at 333 (for the argument that northern Catholic schools remain segregated even today).

<sup>34</sup> See, e.g., Segregated Academies, *supra* note 26, at 1444; see also Champagne, *supra* note 6, at 58; Porter et al., *supra* note 7, at 584. But see JOSEPH CRESPIANO, IN SEARCH OF ANOTHER COUNTRY: MISSISSIPPI AND THE CONSERVATIVE COUNTERREVOLUTION (2007); SETH DOWLAND, FAMILY VALUES AND THE RISE OF THE CHRISTIAN RIGHT (2015); and Winstead, *supra* note 7, for exceptions.

<sup>35</sup> See *Runyon v. McCrary*, 427 U.S. 160 (1976).

<sup>36</sup> *Id.* at 179; see also 42 U.S.C. §1981.

<sup>37</sup> *Runyon*, 427 U.S. at 167.

Effectively, for non-sectarian private schools, the Court held that section 1981 prohibits racial discrimination in the formation of private contracts; thus, the refusal of a private school to accept a Black student who would pay for the school's educational services, was a "classic violation of §1981."<sup>38</sup> Furthermore, the Court explicitly rejected the schools' freedom of association and privacy objections because, "while parents have a constitutional right to send their children to private schools and a constitutional right to select private schools that offer specialized instruction, they have no constitutional right to provide their children with private school education unfettered by reasonable government regulation."<sup>39</sup> Section 1981's restriction on racial discrimination in the making of private contracts is one such reasonable regulation because it serves the government's interest in eliminating racial disparity in private fiscal choices.<sup>40</sup>

Although it never reached the Supreme Court, the D.C. district court in *Green v. Connally*, concluded that private schools could not racially discriminate against Black students five years before *Runyon*.<sup>41</sup> In *Green*, the D.C. court focused on tax law instead of contracts to foreclose private school discrimination.<sup>42</sup> Foreshadowing the Supreme Court's arguments in *Bob Jones v. United States*,<sup>43</sup> the D.C. district court held that private schools could lose their federal tax-exempt status if they participated in racially discriminatory practices.<sup>44</sup> Yet, the D.C. court, like the Supreme Court in *Runyon*, resisted the temptation to extend the ruling to private church schools.<sup>45</sup> Instead, the court called such an inquiry "hypothetical" and stated that "such a

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<sup>38</sup> *Id.* at 172.

<sup>39</sup> *Id.* at 178.

<sup>40</sup> *Id.* at 179.

<sup>41</sup> See *Green v. Connally*, 330 F. Supp. 1150, 1156 (1971).

<sup>42</sup> *Id.* at 1156.

<sup>43</sup> *Bob Jones v. United States*, 461 U.S. 574 (1983).

<sup>44</sup> *Green*, 305 F. Supp. at 1156.

<sup>45</sup> *Id.* at 1169.

problem may never arise,” due to the protections inherent to religious institutions who discriminate based on the “requirements of the religion.”<sup>46</sup>

As these two cases demonstrate, courts in the 70s reserved the issue of desegregating private church schools for a later time, choosing instead to focus on private institutions without religious affiliations.<sup>47</sup> While these decisions relied on contract and tax law to desegregate non-sectarian private schools and close the loophole in *Brown*, seemingly areas of law applicable to church schools, whether private church schools could be treated comparably was uncertain for both the courts and the public.<sup>48</sup> The vagueness of these decisions in respect to private church schools was due largely to the fact that religious schools – unlike regular private schools – possess additional constitutional protection under the First Amendment’s Freedom of Religion clauses.<sup>49</sup> For that reason, the courts chose to wait until the issue of church school segregation was explicitly in front of them before deciding whether such segregation was unconstitutional.<sup>50</sup>

To the disappointment of those white parents and organizations relying on religious protection to maintain segregation, the problem did eventually make it to the Supreme Court.<sup>51</sup> In

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<sup>46</sup> *Id.* 1169.

<sup>47</sup> Dorsen’s work in 1967 already appreciated the difficulty of desegregating private church schools, but also recognized the importance of such an action to the overall plan of integration. *See* Dorsen, *supra* note 25, at 54-55.

<sup>48</sup> *See* Runyon v. McCrary, 427 U.S. 160, 167 (1976) (not considering the issue of whether §1981 applied “to private sectarian schools that practice racial exclusion on religious grounds,” because it was not presented by the facts of that specific case); *see also* Lesley Oelsner, *High Court Curbs Private Schools on Racial Barrier*, N.Y. TIMES, JUNE 26, 1976 (stating that “it was not clear whether the scope of today’s decision would extend to segregated private religious schools as well as to nonsectarian ones”).

<sup>49</sup> *See* U.S. CONST. amend. I; *see also* Oelsner, *supra* note 48 (stating that if religious schools were to fall under *Runyon*, the court would have to decide “whether the prohibition would involve governmental restriction of the right to freely exercise religion or would involve excessive governmental entanglement in religious affairs”).

<sup>50</sup> *See* Green v. Connally, 330 F. Supp. 1150, 1169 (1971). Even though the courts were unsure of the application to the private church schools, segregationists in those schools did not treat this uncertainty as a win. *See* Crespino, *supra* note 34, at 9. Instead, they allowed these decisions to mobilize the religious right and strengthen the already existing relationship between white Christians and white segregationists. *Id.* at 255.

<sup>51</sup> Scholars Grady & Hoffman specifically allege that once *Green* was decided, faith-based schools became private schools “with a different purpose” – a last resort at evading mandatory integration. Marilyn Grady and Sharon C. Hoffman, *Segregation Academies Then and School Choice Configurations Today in the Deep South*, 2 CONTEMPORARY ISSUES IN EDUC. LEADERSHIP 1, 5 (2018). The fact that enrollment in non-Catholic church schools increased 137% between 1970 and 1980, likely confirms Hoffman and Grady’s assertion. *See* Dowland, *supra* note 34, at 23.

1983, now 29 years after *Brown*, the Supreme Court essentially required private church schools to desegregate in *Bob Jones University v. United States*, which consolidated cases from private schools in Mississippi and a case from Bob Jones University located in South Carolina.<sup>52</sup> *Bob Jones* like *Green* concerns the restrictions that the federal government can place on tax-exempt status.<sup>53</sup>

Around 1970, the IRS changed its regulations to prohibit organizations receiving tax-exempt status from having racially discriminatory admission policies.<sup>54</sup> Even though this regulation had been in place at the time of *Bob Jones*, the IRS had removed the tax-exempt status of very few schools.<sup>55</sup> At the time that the case reached the Supreme Court, the Mississippi School involved explicitly excluded Black students from admission in complete disregard to the IRS policy.<sup>56</sup> Bob Jones University, however, did allow Black students to enroll after 1971, however they maintained racially discriminatory policies, rooted in segregation.<sup>57</sup> The specific policies involved in the case concerned interracial dating and were based on the colleges genuinely held belief “that the Bible forbids interracial dating and marriage.”<sup>58</sup>

After consolidating the cases, the Supreme Court affirmed the lower courts’ decisions to uphold the IRS’s policy.<sup>59</sup> The reasoning behind the Court’s decision was that institutions seeking tax-exempt status “must serve a public purpose and not be contrary to established public policy.”<sup>60</sup> At this point, the Court had a plethora of decisions holding that racial discrimination in

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<sup>52</sup> 461 U.S. 574 (1983).

<sup>53</sup> *Bob Jones*, 461 U.S. at 577-78.

<sup>54</sup> This is the regulation that was in question in *Green*. 330 F. Supp. at 1150.

<sup>55</sup> See Crespino, *supra* note 34, at 250; see also Dowland, *supra* note 34, at 46 (stating that “Although the 1983 Bob Jones decision upheld the policy originally mandated by 1970’s *Green* decision...few academies actually lost tax exemptions”).

<sup>56</sup> See *Bob Jones*, 461 U.S. at 578.

<sup>57</sup> *Id.* at 580.

<sup>58</sup> *Id.*

<sup>59</sup> *Id.* at 585.

<sup>60</sup> *Id.* at 587.

education admission policies was contrary to public policy; thus, it was perfectly reasonable for the IRS to remove tax-exempt status for racially discriminatory admission policies.<sup>61</sup> Not forgetting the First Amendment constraints that led to such resistance in *Runyon* and *Green*, the Court closed the opinion by stating that racially discriminatory admission policies violate a strong government interest, as such any limitation on religious liberty placed by the IRS's policy was not unconstitutional.<sup>62</sup>

Thus, by 1983, the Court had “legally” prohibited private church schools – like all other schools –from discriminating in their admission policies to maintain segregated school spaces. According to the official narrative, then, no longer was segregation – and to a certain extent white supremacy – in private church schools a problem. Yet, empirical studies conducted between the late 90s and the early 2000s found that “racial biases persist...in the reasoning parents give for sending their children to alternative schools.”<sup>63</sup> Further, as recent as 2016, the racial demographics of private education, in general, demonstrate that while there has been some increase in Black, Latino, and Asian private school enrollment, regional patterns show that “white students in private schools have the most isolated experiences.”<sup>64</sup> Those isolated experiences are most prominent in the South, where in the last two decades non-Catholic *religious* schools have increased 11%, even though a 2018 UCLA study suggests that nationwide private school enrollment has decreased.<sup>65</sup> Thus, while in terms of the law, the question of

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<sup>61</sup> *Id.* at 593-95.

<sup>62</sup> *Bob Jones*, 461 U.S. at 603-605. This is an application of the strict scrutiny standard, which applies to alleged violations of fundamental rights. See *Regents of Univ. of California v. Bakke*, 438 U.S. 265, 357 (1978) (holding, “Unquestionably we have held that a government practice or statute which restricts ‘fundamental rights’ or which contains ‘suspect classifications’ is to be subjected to ‘strict scrutiny’”). Essentially, if a law or policy violates an individual’s fundamental right given in the constitution, such law or policy may still be constitutional so long as the government has a strong interest in the action and such action is narrowly tailored to that interest. *Id.*

<sup>63</sup> See Porter et al., *supra* note 7, at 579.

<sup>64</sup> See Ee et al., *supra* note 4, at 28.

<sup>65</sup> *Id.* at 6.

whether private church schools are desegregated is settled – in practice, that may not be the complete story.

As such, it would be a mistake to equate such desegregation with an assumption of full integration. To do so, would likely conceal the experience of students – specifically those of color – who attend private church schools. It is more likely, that like all systems of white supremacy, private church schools have adapted and evolved – rendering *Bob Jones* a “short-lived victor[y]” that has slid “into irrelevance as racial patterns adapt[ed] in ways that maintain white dominance.”<sup>66</sup> Understanding how these private church schools have adapted to maintain white dominance, requires listening to those who have a keen view of that dominance first-hand – the Black students who facilitate compliance with desegregation.

## **PART II: The Use of Collective Memory to Reveal Tokenism as a Counter-Narrative**

The acceptance of a few Black students into white educational spaces allows for a softer form of massive resistance: tokenism.<sup>67</sup> Tokenism refers to the difficulties that a numeric minority – typically one that has a perceived lower status in society – has when trying to fit into a previously segregated majority group.<sup>68</sup> In her 1977 book, *Men and Women in the Corporation*, Rosabeth Moss Kanter first explored the theory of tokenism in corporations by looking at the experiences of women – who made up a small numerical minority in the corporate workforce.<sup>69</sup> Flowing from this foundational text is a plethora of sociological and empirical research regarding

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<sup>66</sup>Bell, *supra* note 19, at 373.

<sup>67</sup> See Dorsen, *supra* note 25, at 40 (arguing that tokenism, like outright resistance, serves as a way of fighting the integration prerogative of Brown); see also Segregated Academies, *supra* note 26, at 1441 (suggesting that white parents were more accepting of sending their students to public schools with a small number of black if it meant avoiding genuinely integrated schools).

<sup>68</sup> Kanter, *supra* note 3, at 6; see also Turco, *supra* note 3, at 895; Janice D. Yoder, “Looking Beyond Numbers: The Effects of Gender Status, Job Prestige, and Occupational Gender-Typing on Tokenism Processes,” 57 SOC. PSYCHOL. Q. 150, 151 (1994) (refining Kanter’s theory by including the low-status part of the definition).

<sup>69</sup> Kanter, *supra* note 3.



tokenism in the workplace.<sup>70</sup> Yet, Kanter stated explicitly that her theory was not limited to women in the workplace.<sup>71</sup> Even with this potential for expansion, very little research explores tokenism beyond gender and the workplace.<sup>72</sup> Instead, sociologists have almost exclusively applied the theory in either sex or work-based analysis.<sup>73</sup> As such, this section seeks to explore that potential by utilizing the collective memories of Black students who attended these private church schools to expand the theory of tokenism into the literature of desegregation.<sup>74</sup>

## ***II. Kanter's Theory of Tokenism***

A token is a person who is a part of an underrepresented group in an environment where the overrepresented group formerly maintained uniformity.<sup>75</sup> Tokens are seen not as individuals, but as members of their affiliated minority group.<sup>76</sup> Tokenism refers to the specific ways that these affiliated minority groups exist as “symbols” and “stand-ins” for their groups as a whole,

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<sup>70</sup> See, e.g., Kelly, *supra* note 3 (for tokenism in the educational workplace); King et al., *supra* note 6 (for a general overview of gender-based tokenism studies); Spangler et al., *supra* note 3 (for an example of Kanter's theory of tokenism being applied empirically to the achievements of male and female law students); Turco, *supra* note 3 (for a sociological expansion of Kanter's theory that considers inter-token differences).

<sup>71</sup> Kanter stated that the theory had implications for the “experience of people of any kind who are rare and scarce.” Kanter, *supra* note 3, at 207; see also Turco, *supra* note 3, at 896.

<sup>72</sup> See, e.g., Turco, *supra* note 3, at 896 (for the assertion that even Kanter understood that tokenism theory could expand beyond women in the workplace). But see Lani Guinier, “The Triumph of Tokenism: The Voting Rights Act and the Theory of Black Electoral Success,” 89 MICH. L. REV. 1077 (1991) (for an example of tokenism theory expanding to electoral strategy); see also Mallett, *supra* note 11 (for an example of tokenism theory being applied to Black college students' experiences).

<sup>73</sup> See, e.g., Kelly, *supra* note 3 (taking into account race, but still focused on the race of teachers as workers); King et al., *supra* note 3 (examining the psychological climate of gender equity in the workplace); Spangler et al., *supra* note 3 (examining Kanter's theory empirically by looking at analyzing male and female law student achievements; but see Mallett, *supra* note 11, at 4 (extending tokenism to the educational experience of Black college students but recognizing that the literature on race and tokenism primarily looks at Black women in the academic workforce).

<sup>74</sup> Importantly, like Karida Brown's work, this project does not seek to place value judgments on the desegregation approach taken by civil rights activist. See Brown, *supra* note 11, at 199. Instead, the paper seeks to reveal some of the unknown implications of that strategy.

<sup>75</sup> Kanter, *supra* note 3, at 206; see also Turco, *supra* note 3, at 896; Yoder, *supra* note 68, at 150; Watkins et al., “It's Not Black and White: Toward a Contingency Perspective on the Consequences of Being a Token,” 33 ACAD. OF MGMT. PERSP. 334, 334 (2019).

<sup>76</sup> Spangler et al., *supra* note 3, at 161.

and the pressure that puts on token experience.<sup>77</sup> Tokenism also functions as the means by which the dominant group expresses control over the numerically underrepresented group.<sup>78</sup>

Tokenism, however, is not simply concerned with underrepresented numbers. Later work in tokenism theory has demonstrated that token status requires both underrepresented numbers *and* lower status outside of the environment in question.<sup>79</sup> This lower status requirement is essential because it explains why two similarly situated groups (for example, men and women) do not experience tokenism in identical ways when underrepresented numerically in a traditionally segregated work environment.<sup>80</sup> Missing from Kanter's analysis is the influence of cultural discrimination – whether sex based or otherwise – which shapes the classification of a token.<sup>81</sup> Nevertheless, the specifics of Kanter's overall argument still remain at the foundation of tokenism theory and scholars continue to use it as a way to examine the difficulties placed on numerical minorities in the workplace.<sup>82</sup>

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<sup>77</sup> See Kanter, *supra* note 3, at 207. Importantly, minority in this context refers explicitly to a numeric value – for that reason, at least in Kanter's work, anyone can be a minority. *Id.*

<sup>78</sup> See Kanter, *supra* note 3, at 208; see also Judith Long Law, "The Psychology of Tokenism: An Analysis," 1 *SEX ROLES* 51, 51 (1975). Also, Kanter's original theory focused primarily on proportionality to define the numerically underrepresented group. See Kanter, *supra* note 3, at 208. For Kanter, tokenism could only exist if the numerical group made up fifteen percent or less of an overall groups' demographic. *Id.* Later work has demonstrated that the fifteen percent requirement is arbitrary and can be varied depending on the situation. See Watkins et al., *supra* note 75, at 354.

<sup>79</sup> Kanter believed that her theory was sex and race neutral because of her focus on proportionality. See Kanter, *supra* note 3, at 207-210 (arguing that "it was rarity and scarcity, rather than femaleness per se, that shaped the environment for women in the parts of Indisco mostly populated by men"); see also Yoder, *supra* note 68, at 157. However, later studies demonstrated that the theory was void of neutrality. See Yoder, *supra* note 68, at 151-52; see also Watkins et al., *supra* note 75, at 350 (stating that "Later studies have demonstrated that Kanter's theory is not race or gender neutral and that status theories can help explain why that is true"); Turco, *supra* note 3, at 895 (defining a token as one who has "small numbers in the workplace" and a "low status in the larger society").

<sup>80</sup> Yoder explores this distinction empirically in her study by looking at whether tokenism applied equally to women in traditionally masculine occupations and men in traditionally feminine occupations. Yoder, *supra* note 68, at 151. The results of the study found that "tokenism cannot be a gender-neutral theory, as originally proposed," because societal gender discrimination was essential to creating an environment for tokenism. *Id.* at 158. Further, recent studies have suggested that white males may even exclusively benefit from numerical token status in certain occupations. See Watkins et al., *supra* note 75, at 353; see also King et al., *supra* note 3, at 483.

<sup>81</sup> Yoder, *supra* note 68, at 158.

<sup>82</sup> For examples of scholars relying on Kanter's tokenism theory see King et al., *supra* note 3, at 484; Turco, *supra* note 3, at 895; Watkins et al., *supra* note 75, at 335; Yoder, *supra* note 68, at 150. Importantly, Kanter was not the first person to ever explore tokenism. See, e.g., Law, *supra* note 78 (exploring sex tokenism in the academic

Essential to tokenism theory is the assumption that numerical minorities face three perceptual tendencies as a collective group due to their small number – increased pressure, boundary heightening, and role entrapment.<sup>83</sup> Kanter found that these three tendencies were rooted in the token’s visibility, contrast, and assimilation, respectively.<sup>84</sup> The presence of these tendencies lead to real negative consequences in the performance and experience of tokens.<sup>85</sup>

### **Visibility/Performance Pressure**

Tokens have a “higher visibility than dominant members,” and that visibility can lead to increased performance pressure.<sup>86</sup> Kanter and other scholars suggest that tokens may respond to this increased pressure in two ways: either by taking advantage of the publicity or trying to limit their visibility, leading to either overperformance or underperformance.<sup>87</sup> This performance pressure also influences the ways in which the dominant group perceives the token group.<sup>88</sup> Individual token performance may either confirm or deny dominant notions about the token group.<sup>89</sup>

For example, tokens who overperform due to this pressure may be considered an “exception to the norm.”<sup>90</sup> In contrast, individual tokens’ mistakes or failures are typically considered confirmation of the inferiority of the entire token group.<sup>91</sup> Thus, tokens have the

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profession). Yet, the majority of the literature credits Kanter’s work as the first to advocate for tokenism as a theory and this paper relies on the foundational principles laid out in that work.

<sup>83</sup> Kanter, *supra* note 3; *see also* King et al., *supra* note 3, at 484; Mallet, *supra* note 11, at 5; Tucro, *supra* note 3, at 896.

<sup>84</sup> *See* Kanter, *supra* note 3, at 210; *see also* Kelly, *supra* note 3, at 230; Watkins et al., *supra* note 75, at 348.

<sup>85</sup> *See* Kanter, *supra* note 3; *see also* King et al., *supra* note 3, at 483; Watkins et al., *supra* note 75, at 335; *but see* Kelly, *supra* note 3, at 230 (for the argument that these three tendencies are not independent of the beliefs of the token and therefore, do not have to result in negative consequences).

<sup>86</sup> *See* Watkins et al., *supra* note 75, at 347-48; *see also* Kanter, *supra* note 3, at 210 (“Tokens get attention. One by one, they have higher visibility than dominants looked at alone”); Spangler et al., *supra* note 3, at 161; Mallet, *supra* note 11, at 20.

<sup>87</sup> Kanter, *supra* note 3, at 213, 221; *see also* Mallet, *supra* note 11, at 22-23.

<sup>88</sup> *See* Kanter, *supra* note 3, at 221.

<sup>89</sup> Kanter, *supra* note 3, at 221; *see also* Mallet, *supra* note 11, at 20.

<sup>90</sup> Mallet, *supra* note 11, at 20.

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

additional worry that their accomplishments or mistakes will have implications for other members of their group.<sup>92</sup> In this way, tokens differ from the dominant group because they have the “burden of representing their category, not just themselves.”<sup>93</sup>

### **Contrast/Boundary Heightening**

Boundary heightening, unlike performance pressure, is concerned primarily with the perceptions and opinions of the dominant group and how those perceptions/opinions affect the tokens’ experience negatively through social isolation or exclusion.<sup>94</sup> One of the key components of tokenism theory is that the presence of the token group disrupts a previously segregated environment or, in other words, an environment where the dominant group formerly possessed uniformity. For that reason, the presence of the token group leads to increased polarization of the dominant group.<sup>95</sup> The dominant group needs this polarization to “preserve their commonality.”<sup>96</sup>

Polarization is accomplished by the dominant group exaggerating differences between themselves and the token group.<sup>97</sup> Kanter calls this exaggeration contrast and argues that this heightened contrast allows the dominant group to set up boundaries that exclude or isolate the tokens from participating fully with the dominant group.<sup>98</sup> Some tokens may successfully surpass these boundaries, but to do so typically requires a token to demonstrate loyalty to the dominant group by turning “against members of their own category.”<sup>99</sup> For those tokens that do not surpass

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<sup>92</sup> Kanter, *supra* note 3, at 214; *see also* Spangler et al., *supra* note 3, at 161.

<sup>93</sup> Kanter, *supra* note 3, at 214.

<sup>94</sup> For this reason, some scholars categorize this tendency as “social isolation” instead of boundary heightening. *See* Spangler et al., *supra* note 3, at 162; *see also* Mallett, *supra* note 11, at 9-10; Watkins et. al, *supra* note 75, at 348. This essay uses boundary heightening because it is the language used by Kanter. *See* Kanter, *supra* note 3, at 210.

<sup>95</sup> Kanter, *supra* note 3, at 210; *see also* Spangler et al., *supra* note 3, at 161.

<sup>96</sup> Kanter, *supra* note 3, at 210-211.

<sup>97</sup> *Id.* at 210-211; *see also* King et al., *supra* note 3, at 484.

<sup>98</sup> Kanter, *supra* note 3, at 222; *see also* Mallett, *supra* note 11, at 10; Watkins, *supra* note 7, at 348.

<sup>99</sup> Kanter, *supra* note 3, at 228 (for example, women in the workplace being classified as “one of the boys”).

these boundaries, their social isolation serves to prevent them from being integrated into the dominant group.<sup>100</sup>

### **Assimilation/Role Entrapment**

Lastly, role entrapment looks at the influence of stereotypes and generalizations on the tokens' ability to retain individuality amongst the dominant group.<sup>101</sup> As token groups share some form of salient identity – like race or sex – they are more easily stereotyped based on that salient identity.<sup>102</sup> Those generalizations and stereotypes, although not necessarily inclusive of each individual token, may provide tokens with an instant way to be accepted in the dominant group.<sup>103</sup>

For Kanter, this leads to assimilation, which she defines as the incapability of tokens to “be seen as they really are,” because they are instead “distorted to fit preexisting generalizations about their category as a group.”<sup>104</sup> As such, tokens may be trapped into roles that only confirm the dominant groups' stereotypes about the token group.<sup>105</sup> Leading them to believe that the only acceptable behavior, is “that which confirms to a stereotype.”<sup>106</sup> Like boundary heightening, however, tokens can disrupt this role entrapment, but typically it requires challenging stereotypes regularly, which can be exhausting and time-consuming – leading some tokens to simply accept the stereotypes and generalizations.<sup>107</sup> Therefore, while tokens might assimilate and confirm to stereotypes, they might be doing so to ease the expectations of others instead of performing in ways “consistent with their own preferences.”<sup>108</sup> These three categories – increased pressure,

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<sup>100</sup> See Spangler et al., *supra* note 3, at 161; see also Mallett, *supra* note 11, at 24.

<sup>101</sup> Kanter, *supra* note 3, at 211.

<sup>102</sup> *Id.*

<sup>103</sup> *Id.*

<sup>104</sup> *Id.* at 230; see also Mallett, *supra* note 11, at 26.

<sup>105</sup> Kanter, *supra* note 3, at 237, 230.

<sup>106</sup> Spangler et al., *supra* note 3, at 161; see also Kanter, *supra* note 3, at 230; King et al., *supra* note 3, at 464-485.

<sup>107</sup> Spangler et al., *supra* note 3, at 161.

<sup>108</sup> Watkins et al., *supra* note 75, at 348.

boundary heightening, and role entrapment – describe the ways in which tokenism theory explains the negative experiences endured by tokens in an environment with a dominant group.<sup>109</sup> These elements of tokenism can be observed in the private Christian church school context by examining the collective memory of Black students.

## ***II. The Importance of Collective Memory***

Memory studies exist as a “multifaceted and evolving field of research,” reaching beyond the boundaries of a specific academic discipline.<sup>110</sup> While memory scholarship has witnessed an increase in interest recently, its roots are deeper – encompassing thinkers as far back as the Greeks.<sup>111</sup> The study of the social or collective aspects of memory, however, have largely been a recent phenomenon – becoming more common in scholarship produced in the nineteenth and twentieth centuries.<sup>112</sup> In their 1998 survey of Social Memory Studies literature, Jeffrey K. Olick and Joyce Robbins note that the field of memory becomes inundated with references to social or collective memory post-1980.<sup>113</sup> Due to this multitude of scholarship, it is important to define collective memory before exploring its’ use as the bridge connecting tokenism to the issue of desegregation.

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<sup>109</sup> Although not relevant to this project per se, Catherine Turco’s work on intra-token distinctions is an important recent addition to the tokenism literature. *See, generally*, Turco, *supra* note 3. By adding what she calls the “cultural contingency of tokenism,” Turco brings complexity to the specified three negative tendencies of tokenism by demonstrating that cultural resources can exclude certain tokens within a token group (intra-token distinctions). *Id.* at 895. Turco argues that in certain situations, one group is better suited to integrate into the dominant group; thus, that group will not experience the degree of negative tokenism consequences that the other group experiences. *Id.* at 903. For example, in the traditionally white male buyout industry, Black men were culturally advantaged over Black women, even though they make up a token Black group, because in that industry maleness was valued over the exclusion of femaleness. *Id.* at 907. While Turco, limits her analysis to different work environments, it could easily be extended to other contexts where one set of tokens has cultural resources not available to other members of the group.

<sup>110</sup> *See, e.g.*, Lucy Bond, Stef Craps and Pieter Vermeulen, *Introduction: Memory on the Move*, in MEMORY UNBOUND: TRACING THE DYNAMICS OF MEMORY STUDIES (eds. 2016); *see also* Jeffrey K. Olick and Joyce Robbins, “Social Memory Studies: From ‘Collective Memory’ to the Historical Sociology of Mnemonic Practices,” 24 ANN. REV. OF SOC. 105, 106 (1998).

<sup>111</sup> Olick and Robbins, *supra* note 110, at 106.

<sup>112</sup> *Id.*

<sup>113</sup> *Id.* at 107. For an expansive overview of the events that gave rise to the interest in collective or social memory. *See Id.* at 108-122.

Collective memory, as a concept, inherently includes a social process.<sup>114</sup> Leading some memory scholars, such as Svetlana Boym, to define collective memory as the “common landmarks of everyday life” constituting the *shared* social frameworks of individual recollections.<sup>115</sup> This definition of collective memory relies on it being “impossible for individuals to remember in any coherent and persistent fashion outside of their group contexts.”<sup>116</sup> Meaning, the way that we remember things requires others.<sup>117</sup> Yet, even though the social aspect of collective memory is essential, it is still a process that requires individual recollections.<sup>118</sup> In this way, collective memory explains the process by which individual memory is shaped by shared social frameworks; and thus, a collection of individual memories can help evidence a shared framework.<sup>119</sup>

Despite the stated usefulness of collective memory as a method for understanding occurrences in society, there is one objection to its use that is worth discussing. As mentioned, collective memory necessarily requires individual recollection to construct a comprehensive narrative, which is inherently a messy endeavor.<sup>120</sup> This messiness comes from the fact that recalling a memory totally and accurately is impossible.<sup>121</sup> Yet, this objection is only

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<sup>114</sup> Jeffrey K. Olick, “Collective Memory: The Two Cultures,” 17 *SOC. THEORY* 333, 345 (1999) (arguing that all memory, not just memory labeled as collective, “is in some sense social”); *see also* Olick and Robbins, *supra* note 110, at 122 (for the argument that all memory requires a process as oppose to an unchanging thing).

<sup>115</sup> SVETLANA BOYM, *THE FUTURE OF NOSTALGIA* 116 (2001) (emphasis added); *see also* Cynthia Fabrizio Pelak, “Institutionalizing Counter-Memories of the U.S. Civil Rights Movement: The National Civil Rights Museum and an Application of the Interest-Convergence Principle,” 30 *SOC. F.* 305, 308 (2015) (defining collective memory similarly as the “commonly shared and jointly remembered images of the past”).

<sup>116</sup> *See* Olick and Robbins, *supra* note 110, at 109.

<sup>117</sup> *See* VIET THANH NGYUEN, *NOTHING EVER DIES: VIETNAM AND THE MEMORY OF WAR* 10 (2016).

<sup>118</sup> Olick and Robbins, *supra* note 110, at 111; *see also* ETHAN J. KYTLE AND BLAIN ROBERTS, *DENMARK VESEY’S GARDEN: SLAVERY AND MEMORY IN THE CRADLE OF THE CONFEDERACY* 8 (2018) (arguing that personal memories coalesce “into collective, social memory – the aggregation of individual remembrances”).

<sup>119</sup> Or, in other words, collective memory can be “both a mirror and a lamp,” reflecting individual experience while also providing guidance for society. *See* Olick and Robbins, *supra* note 110, at 124; *see also* Pelak, *supra* note 115, at 308 (stating that “Social memory scholars emphasize the utility of collective memories for constituting social identities, power hierarchies, and cultural discourses and practices”).

<sup>120</sup> Boym, *supra* note 115, at 117 (arguing that “Collective memory is a messy, unsystemic concept that nevertheless allows one to describe the phenomenology of human experience”); *see also* Brown, *supra* note 11, at 204.

<sup>121</sup> As Ngyuen states, “something is always forgotten.” Ngyuen, *supra* note 117, at 10.

condemning if the collective memory enterprise is concerned only with exactness, as oppose to understanding the social realities of the groups being studied.<sup>122</sup>

Meaning, even though memory is a messy and inherently constructed enterprise, it does not follow that memories cannot reveal “truth”.<sup>123</sup> Further, because collective memory relies on members of a group narrating their past, even without exactness, it is socially as important as “what ‘actually’ happened.”<sup>124</sup> As such, collective memory allows one to “describe the phenomenology of human experience,” in a personal way.<sup>125</sup>

In this context, that phenomenon is that of Black students desegregating traditionally racially segregated spaces. Although not explicitly using the term collective memory, other scholars have highlighted the need for listening to the experiences of Black students in white educational spaces to understand desegregation as “something more than numbers.”<sup>126</sup> These experiences are crucial to understanding not only the persistence of racial inequality in these private church schools, but also, as Ethan Kytte and Blain Roberts note, “to some degree, the persistence of our divided historical memory.”<sup>127</sup> For collective memories, after all, are only credible if they are “inclusive of the group by which they are defined” – in this case those who make desegregation possible – Black students.<sup>128</sup>

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<sup>122</sup> Brown, *supra* note 11, at 204.

<sup>123</sup> In a lot of ways, the study of memory is similar to the acceptance of certain hearsay matters in the court system. Traditionally, statements that the rules of evidence classify as hearsay are not admissible in court. Fed. R. Evid. 801(c). Yet, if the attorney is entering the testimony to evidence the testifier’s reality and not the truth of the matter asserted, then it is admissible. *Id.*

<sup>124</sup> Brown, *supra* note 11, at 204; *see also* Kytte and Roberts, *supra* note 118, at 6 (suggesting that in the context of collective memory it is the function of memory rather than its accuracy that is the most relevant).

<sup>125</sup> *See* Boym, *supra* note 115, at 117.

<sup>126</sup> *See* Joe R. Feagin and Melvin P. Sikes, “How Black Students Cope with Racism on White Campuses,” *J. OF BLACKS IN HIGHER EDUC.* 91, 91 (1995); *see also* Mallet, *supra* note 13, at 5. For another example of memory being used to explore the history of discrimination in white educational spaces *see* *BEYOND CENTRAL, TOWARD ACCEPTANCE: A COLLECTION OF ORAL HISTORIES FROM STUDENTS OF LITTLE ROCK CENTRAL HIGH* (Mackie O’Hara & Alex Richardson eds., 2010).

<sup>127</sup> Kytte and Roberts, *supra* note 118, at 349.

<sup>128</sup> *See* Nguyen, *supra* note 117, at 10.



Thus, to ignore the memories of these students simply because memory can be faulty is to ignore the role that the nation-state already plays in memory (i.e. setting the official narrative of desegregation accomplishment).<sup>129</sup> Cynthia Pelak defines an official narrative as “those [narratives] supported by cultural and political leaders with state power to promote individual and group interests that confirm the status quo.”<sup>130</sup> These official narratives exist to sustain the nation-state’s interest in “controlling the national narrative and the national past.”<sup>131</sup> Such control requires an “everything is fine” element that seeks to absolve the nation-state of any wrongdoing.<sup>132</sup> Here, the courts – as arms of the state – sets the official narrative through their desegregation decisions, specifically those decisions desegregating private church schools.<sup>133</sup>

Favoring and uplifting memories and experiences of those traditionally left out of the national narrative, however, operates to disrupt any perception of everything being fine.<sup>134</sup> In other words, disrupting a formal narrative with the experience of a marginalized group creates a counter-narrative.<sup>135</sup> Counter-narratives or counter-memories are memories that come “from

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<sup>129</sup> See *supra*, Part I(B). See Olick and Robbins, *supra* note 110, at 126 (for a summary of the roles nation-states can play in memory); see also NICOLE LORAUX, MOTHERS IN MOURNING: WITH THE ESSAY, OF AMNESTY AND ITS OPPOSITE 108 (1998) (for the nation-state’s censorship role in national memory).

<sup>130</sup> Pelak, *supra* note 115, at 308.

<sup>131</sup> Olick and Robbins, *supra* note 110, at 126.

<sup>132</sup> See Loraux, *supra* note 129, at 91 (“Everything is clear: Politics is to act as if everything were fine. As if nothing had happened. Neither conflict nor murder, nor ill-feelings (nor resentment)”).

<sup>133</sup> See *infra* Part I.

<sup>134</sup> Other scholars take this approach of redirecting memory scholarship from nation-states to other groups and perspectives. See Olick and Robbins, *supra* note 110, at 126. Further, Karida Brown notes that this use of collective memory for disruption is particularly valuable when studying phenomenon connected with marginalized groups because without it, such perspectives would “remain undocumented and run the risk of historical erasure.” Brown, *supra* note 11, at 204. As such, it is no surprise that other scholarship explores connections between race and memory in other contexts – such as slavery. See, generally, Kytte and Roberts, *supra* note 118.

<sup>135</sup> In this project, the counter-narrative to desegregation will be the presence of tokenism. See *infra*, Part II, Section III. Counter-narratives are not only used as a methodology in memory studies, critical race theorists also use counter-narratives as a framework to explain inequalities. Derrick Bell most famously uses this framework in *Faces at the Bottom of the Well*. See DERRICK BELL, FACES AT THE BOTTOM OF THE WELL 13 (1992).

below” and “challenge and oppose institutionalized or official collective memories and/or collective forgetting in society.”<sup>136</sup>

For desegregation, the official narrative depends on the “progress” achieved by *Brown v. Board of Education* and other efforts to integrate systems of education.<sup>137</sup> This progress depends on traditional civil rights ideology, which assumes that equality of opportunity translates to functional equality of experience.<sup>138</sup> Intentional or not, this ideology becomes the pillar of the “color-blind” perspective.<sup>139</sup> The color-blind perspective, often used by conservatives to thwart modern efforts to truly integrate, directs judges and law makers to ignore unequal outcomes in favor of race-neutral language.<sup>140</sup> As such, without a counter-narrative, it is easy to conclude that the court’s decision in *Bob Jones* resolves any question of racial discrimination connected to segregation – and by extension white supremacy – in private church schools.<sup>141</sup> Here, the

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<sup>136</sup> Pelak, *supra* note 115, at 308. Interestingly, Pelak suggests that counter-narratives can become institutionalized in the memory of society at large. *Id.* at 306. She provides the example that the civil rights movement led to renaming streets formerly named after Confederate leaders to names reflecting civil rights heroes and heroines. *Id.*

<sup>137</sup> Importantly, *Brown* is often considered the starting point of Civil Rights Era, and as such, officially a defining moment for a “post-racial” national narrative. *Brown*, *supra* note 11, at 199.

<sup>138</sup> For a key definition of traditional civil rights ideology see Kelly, *supra* note 3, at 231. For an interesting article exploring the problems of “equality of opportunity” ideology see Alan Freeman, “Racism, Rights and the Quest for Equality of Opportunity: A Critical Legal Essay,” 23 HARV. C.R.-C.L. L. REV. 295 (1988).

<sup>139</sup> Kelly, *supra* note 3, at 231. A “color-blind” perspective, at least in the legal context, refers to maintaining formal racial equality by focusing explicitly on neutral laws and by not taking race into account, regardless of whether such decision leads to more subtle forms of racism. See CRITICAL RACE THEORY: THE KEY WRITINGS THAT FORMED THE MOVEMENT xx (Kimberlé Crenshaw et al. eds., 1995).

<sup>140</sup> See *Parents Involved in Cmty. Sch. V. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 748 (2007) where Justice Roberts says the “way to stop discrimination on the basis of race is to stop discriminating on the basis of race,” to strike down an educational policy that would have integrated the Seattle school districts.

<sup>141</sup> Additionally, such a counter-narrative can also provide context to recent data showing that minority students are statistically less segregated in private schools than public schools. See Ee et al., *supra* note 4, at 9. Without the counter-narrative this data suggests that minority students in private schools are better off socially because they are in environments that are statistically more integrated. *Id.* Yet, understanding the implications of tokenism provides a more complete story. Although not in an educational context, Lani Guinier also highlights the importance of recognizing racial tokenism when he argues that the ignoring of tokenism leads to black electoral success legitimizing the ideology of “equality of opportunity.” Guinier, *supra* note 72, at 1079-1080.

counter-narrative of tokenism is revealed by exploring the collective memory of Black students, without which, the comprehensive story of private church school desegregation is incomplete.<sup>142</sup>

### ***III. Portsmouth Christian Pilot Study***

In this section, I will demonstrate how collective memory can help extend tokenism theory to Black students who attend private church schools, by providing insight aligned with the three traditional tendencies of tokenism and revealing three new elements of those tendencies in this context through interviewing Black students in a specially designed pilot study. I chose Portsmouth Christian School (“PCS”) – a small private Christian school located in Portsmouth, Virginia – as an initial pilot case study because of its intimate connection to this project and because of my ability to locate and contact participants remotely during a pandemic.<sup>143</sup> PCS is an effective school for a pilot study because of the following: (1) it was founded during Massive Resistance, in 1965, but after the cut off for segregation academies; (2) it was located in a state that actually participated in active Massive Resistance; and (3) as of the 2017-2018 school year, its percentage of Black students is significantly less than the racial demographic of both the comparable public schools and Portsmouth as a whole.<sup>144</sup>

Due to the limited ability to travel because of Covid-19, I identified participants by reaching out via social media and email. The selection of participants was based on the following criteria: the individual attended PCS for at least one year, was over the age of 18, and identified

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<sup>142</sup> It is not my position that this experience of black educational tokenism is unique and exclusive to private church schools. Further research may explore this phenomenon in other highly segregated spaces – including non-sectarian private schools and even public schools.

<sup>143</sup> Portsmouth Christian Schools, *supra* note 5. PCS is one of the schools analyzed in my prior work on church schools. *See* Blaiklock, *supra* note 4. Further, because I attended this school for ten years, I was able to use my own connections to contact and interview participants.

<sup>144</sup> For the founding date of PCS see Portsmouth Christian School, *supra* note 5. *See* Appendix 1 for the breakdown of PCS’ racial demographics.

as either Black or Biracial mixed with Black.<sup>145</sup> Immediately, I received over fifteen responses and after scheduling conflicts, was able to interview eleven former students who met the stated criteria. Participants varied in age and gender, but all attended PCS at some point between the 1980s and 2012.

All interviews were conducted via zoom – recorded and transcribed. The interviews also varied in length, but all interviews were centered on racial identity, explicit and implicit incidents of racism, and any pressure that resulted from those two topics. By framing the conversations this way, it was my intention to reveal any experiences that explained the ways in which being in the numerical minority shaped not only the Black students’ personal racial identity, but their collective experience as a numerical minority in a majority white space. While the interviewees were encouraged to share whatever experiences they thought were relevant, I did provide some guidance by asking broad and open-ended questions, such as “Describe for me what it was like to be a student of color at Portsmouth Christian? Where there any experiences that impacted you?” and “Did you ever experience, either personally or as an observer, overt acts of racism?”

I developed the questions with the intention of providing the least amount of structure, to create an environment where the interviewees felt able to share the memories, they found relevant. In using a loose interview style, it was my hope to encourage the interviewees to share memories that mattered to their own personal experience. Once the responses were complete, I analyzed the responses by filtering them through the three traditional elements of tokenism: visibility, contrast, and assimilation as well as making note of instances where I concluded that new elements of tokenism, specific to this context of racial education appeared.

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<sup>145</sup> Admittedly, PCS has other students that do not identify as solely Black or White, but for the purposes of this project, I focus exclusively on those two categories. Future research in this area could explore the experiences of other minorities who attend these schools.

As a pilot study, this data set has a few obvious limitations. First, the limited number of students interviewed.<sup>146</sup> Scholars have demonstrated, however, that when it comes to using interviews for the purpose of revealing memories of a certain group, a small number is sufficient to offer novel narratives not concerned with generalized conclusions.<sup>147</sup> In this project, the goal is primarily to reveal the lived experiences of Black students at private church schools and these eleven students satisfy that goal.<sup>148</sup> Even still, future studies should aim to expand this research by including more students.

Another connected limitation is the use of one environment: Portsmouth Christian. It is entirely possible that the experiences remembered by these interviewees are unique to this one private church school. Likewise, a more expansive study would include students from a variety of private church schools to see if their experiences produced the same results. Due to the time and research limitations of this project, interviewing participants from other schools was not possible, but it should be taken on by future work. Nevertheless, even as a pilot study the experiences of the students shared in these interviews provide insight into the effect of tokenism on Black students.

### **Performance Pressures & Black Exceptionalism**

*“You know, I, I felt like I had the weight of the culture on me.”- Subject H<sup>149</sup>*

It is no surprise that Subject H recalled feeling a weight on her shoulders. Unlike any of the other participants, Subject H attended PCS in the 80s, around the time that the school would

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<sup>146</sup> It should be noted, however, that this research is concerned with narrative experience and not statistical significance. As such, the limited number of students is not as much of a downfall as it would be in a paper focused on statistical analysis.

<sup>147</sup> See Kelly, *supra* note 3, at 233.

<sup>148</sup> Further, by its very nature, tokenism examines a small quantity of people. Thus, the sample size of Black students at any given time at PCS would unavoidably be a small number.

<sup>149</sup> Zoom Interview with Subject H, PCS Alumnus, 12:11 (Feb. 22, 2021).

have been first required to desegregate by the Court’s *Bob Jones v. University* decision.<sup>150</sup>

Accordingly, when asked about the sheer number of Black students in her class and the school, Subject H assertively stated that she “was the only Black student” in her class.<sup>151</sup> Further, by the time Subject H was in 10<sup>th</sup> grade, she recalled that she was the only black girl “in the entire high school. That was it, just me.”<sup>152</sup>

Although all the other interviewees attended PCS in the late 90s and 2000s, Subject H’s sentiments were echoed in all the interviews. For as most students could recall, they were one of few Black students at Portsmouth Christian during their time at the school.<sup>153</sup> Naturally, being so few led the students to be highly visible, not only to the other white students, but also among themselves. When asked about her hesitation to attending the school, Subject A noticed, “a lot of Caucasian students,” and “not a lot of African-American students.”<sup>154</sup>

At Portsmouth Christian, the high visibility of Black students was only enhanced by the lack of Black teachers. When asked if they had any Black teachers during their time, most students responded no, although some remembered having a Black substitute teacher or coach.<sup>155</sup> Only one Black teacher was mentioned at all and his tenure at the school was short lived.<sup>156</sup> These low numbers were not benign, but instead highlighted an increase in Black student visibility or as Subject F puts it, “there were so few of us that, it was like, not that all eyes were

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<sup>150</sup> See *supra* note 51-62 and accompanying text.

<sup>151</sup> Subject H, *supra* note 149, at 7:37.

<sup>152</sup> See Subject J, *supra* note 1, at 8:39.

<sup>153</sup> See Zoom Interview with Subject C, PCS Alumnus 5:23 (Feb. 16, 2021); see also Subject E, *supra* note 1, at 8:39; Subject J, *supra* note 1, at 9:06; Zoom Interview with Subject I, PCS Alumnus 6:38 (Feb. 23, 2021); Zoom Interview with Subject K, PCS Alumnus 9:06 (Mar. 13, 2021) (for approximations from other interviewees on how many Black students were in their class).

<sup>154</sup> See Zoom Interview with Subject A, PCS Alumnus 05:34 (Feb. 12, 2021).

<sup>155</sup> For “no” answers see *Id.* at 12:43; Subject H, *supra* note 149, at 25:17; Subject J, *supra* note 1, at 17:48; Zoom Interview with Subject B, PCS Alumnus 17:24 (Feb. 15, 2021); Zoom Interview with Subject D, PCS Alumnus 35:39 (Feb. 17, 2021); Subject I, *supra* note 153, at 17:02. For answers referring to a substitute teachers or coaches see Subject C, *supra* note 153, at 26:51; Subject D, *supra*, at 35:55; Subject J, *supra* note 1, at 17:48.

<sup>156</sup> See Subject B, *supra* note 155, at 17:24; see also Subject E, *supra* note 1, at 49:07.

on us, but it's like, I felt we were viewed different because there weren't as many of us."<sup>157</sup> Thus, like the tokens in Kanter's 1977 analysis, Black students experience higher visibility than the white students who make up the dominant group.

And like Kanter's token theory, this high visibility translates into increased performance pressure. This is best demonstrated by Subject I's recollection concerning academic achievement. When asked about her experience as a student of color, Subject I stated:

*I felt really **pressured** to perform academically to kind of combat stereotypes of being a black woman. So I just felt the need to sort of like **overcompensate** or to sort of like engage in impression management to kind of like combat some of the stereotypes associated with being a black woman.<sup>158</sup>*

Or, when Subject H recalled:

*I really had this feeling inside that I wanted to make sure that Portsmouth Christian knew that I was just as good as, you know, as any of them that I was just a smart, I was just as cultured, well-rounded. I wanted them to believe that...I was not going to be the, the, the only black girl who can't, who is, who has the worst grades in the class.<sup>159</sup>*

These two examples demonstrate how Black students may overperform in response to the increased performance pressure assigned to them due to their token status. Providing an example of how token theory can and does explain the experience of Black private church school students.

Overperformance, however, also reveals a unique concern for Black students in the private church school setting: the traps of Black Exceptionalism. The idea of connecting exceptionalism and tokenism is not novel.<sup>160</sup> Even before Kanter distilled the concepts that

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<sup>157</sup> Subjects F and G, *supra* note 1, at 15:20.

<sup>158</sup> See Subject I, *supra* note 153, at 10:22 (emphasis added).

<sup>159</sup> Subject H, *supra* note 149, at 12:11.

<sup>160</sup> See, e.g., Law, *supra* note 78, at 58.

would define tokenism theory, Judith Law argued that exceptionalism is compelled by the presence of the token because it allows the dominant group to “reassert the social distance between the dominant and primary-deviant groups.”<sup>161</sup> The idea of the so-called, “exceptional Negro,” goes back even farther.<sup>162</sup> From the time of slavery, the concept has been used by whites to explain any Black person who shares characteristics considered above their station.<sup>163</sup> In reality, the idea is simply a trope relying mistakenly on the idea that Black people are inferior and therefore, “African Americans who accomplish notable feats are rare.”<sup>164</sup> Yet, the idea continues to be internalized in both white and Black people.<sup>165</sup>

This idea of Black exceptionalism presents itself clearly in the experience of the Black students interviewed. Most explicitly, Subject C recalled that this notion of exceptionalism allowed him to have an overall better experience at PCS.<sup>166</sup> In his case, his exceptionalism was connected to his ability to play basketball well and his ability to be “well-spoken.”<sup>167</sup> He recalls, “it’s not that I was any more exceptional than anybody else. I was just those things *and* Black. And they didn’t expect those things for Black people.”<sup>168</sup> Likewise, Subject J experienced exceptionalism connected to athleticism by her Tennis coach, who appeared shocked that she

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<sup>161</sup> *Id.*

<sup>162</sup> See, e.g., Association for the Study of Negro Life and History, Inc., *The Story of the Exceptional Negro*, 3 NEGRO HIST. BULL. 129 (1940). Importantly, the Black exceptionalism in this project is not to be confused with the Black exceptionalism that refers to the systematic overlooking of Black people in an effort to make broader progress claims about “people of color.” See, e.g., Parisi et al., *Multi-Scale Residential Segregation: Black Exceptionalism and America’s Changing Color Line*, 89 SOC. FORCES 829 (2011); David O. Sears and Victoria Savalei, *The Political Color Line in America: Many ‘Peoples of Color’ or Black Exceptionalism?*, 27 POL. PSYCHOL. 895 (2006). Instead, this paper refers only to the idea that by accomplishing great success, Black people are considered exceptional to the Black community at large.

<sup>163</sup> Association for the Study of Negro Life, *supra* note 162, at 129; see also Karen M. Bowdre, *Spike and Tyler’s Beef: Blackness, Authenticity, and Discourses of Black Exceptionalism*, in FROM MADEA TO MEDIA MOGUL: THEORIZING TYLER PERRY 180, 190 (TreaAndrea M. Russworm, Samantha N. Sheppard, and Karen M. Bowdre, eds., 2016).

<sup>164</sup> Bowdre, *supra* note 163, at 190-91.

<sup>165</sup> Bowdre makes this point exceptionally well by arguing that Black parents promulgate this idea by teaching their children that “they must be twice as good as their white counterparts to get hired.” *Id.* at 191.

<sup>166</sup> Subject C, *supra* note 153, at 6:13.

<sup>167</sup> *Id.*

<sup>168</sup> *Id.* at 16:30.



was any good at Tennis and then immediately began comparing her to what he considered another Black exception: Serena Williams.<sup>169</sup> These examples of Black exceptionalism arise as a way for the dominant group to explain behavior that they would otherwise not associate with members of the Black race, even when the behavior was not objectively exceptional.

For students like Subject D, exceptionalism was understood as a badge of honor, as he recalled a white student telling him, “Your kind of, you’re like the exception. It’s like you’re, you’re not that type of Black guy,” insinuating that something positive separated Subject D from other Black men – making him acceptable.<sup>170</sup> Further, it is not just the dominant group and the “exceptional” Black students who perceive this trope at work. Other Black students understood that some Black students were treated differently due to their perceived exceptional status.<sup>171</sup> In the terms of Subject E, these students were often considered part of the “golden group,” by the other Black students.<sup>172</sup>

Although exceptionalism is not an explicit tenet of visibility/performance pressure in traditional tokenism theory, these experiences demonstrate why exceptionalism strengthens the claim that performance pressure surrounds Black students in private church schools. It adds an additional way to understand the traditional decision of a token to overperform or underperform. It also brings to light the extra weight that Black students have in “representing their category, not just themselves,”<sup>173</sup> because it shows how separating from their category can simultaneously contribute to the subjugation of other Black students and people.

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<sup>169</sup> See Subject K, *supra* note 153, at 18:50.

<sup>170</sup> See Subject D, *supra* note 155, at 16:29. Other students experienced this kind of exceptionalism from teachers as well. See Subject K, *supra* note 153, at 18:28 (where a former teacher told him later that she always thought he was “a good one”).

<sup>171</sup> See Subject E, *supra* note 1, at 12:38.

<sup>172</sup> *Id.*

<sup>173</sup> Kanter, *supra* note 3, at 214.

## **Boundary Heightening & Colorism**

*“Who the F\*ck I’m going to sit with. Who am I going to sit with? I don’t talk to these [white] people. I don’t have anything in common with them...”- Subject K<sup>174</sup>*

In this moment, Subject K was recalling an experience rooted in social isolation. At lunch time, the classes were separated by grades. All the Black male students that Subject K was friends with were seated in another room and Subject K was relegated back to the lunchroom with students in his grade – which except for three other Black female students – were all white.<sup>175</sup> This feeling of exclusion and isolation, demonstrates the types of negative experiences Black students at PCS feel due to the boundaries set up by white students to maintain strict lines of polarization.

To use Kanter’s terms, these exaggerated differences and mechanisms of boundary control take on a variety of forms that can be minor or major for the token Black student. For example, for some white students this exertion of control requires only a statement about skin tone. Subject I underlies this point when she relays a conversation with white girl students. Whenever they talked about getting tan, they would say, “I want to get dark, but not like your dark,” and seal the statement with a “no offense.”<sup>176</sup> A subtle reminder that perceived physical differences maintain the boundary between white and Black students.

In other examples, this desire to highlight boundary differences come in the form of pushing cultural boundaries designed to remind Black students that white students still dominate. An incident at football camp remembered by Subject E provides evidence for this point. During his first football camp, two white male students came up to Subject E and asked, “do you mind if

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<sup>174</sup> See Subject K, *supra* note 153, at 18:28.

<sup>175</sup> *Id.*

<sup>176</sup> See Subject I, *supra* note 153, at 13:08.

we say the N-word?”<sup>177</sup> When probed on what they meant by that question, both boys just nonchalantly stated that “sometimes we just say it.”<sup>178</sup> While this conversation might initially seem innocent – in fact, the boys were asking permission to do something that would otherwise be offensive – when understood in the larger context of dominant group boundary setting, it displays the tendency of the dominant group to scout out how high their polarizing boundaries can be set without any confrontation.

Lastly, these exclusionary boundaries can operate more subtly. Take for example, this story from first grade conveyed by Subject K:

*I remember first grade, you know, your teacher they'll read you like the Bible story and have the pictures and whatnot. You see the white Jesus, white Adam, white, all this, but you, you know, you're not, you're not realizing it's because everybody in your class is white. You're thinking like this, this is the norm...And so I remember my teacher saying we're all brothers and sisters and, you know, I was like I don't know if I'm your brother or sister. I'm dark.<sup>179</sup>*

The teacher in this recollection was not explicitly exaggerating differences to exclude Subject K from the curriculum and the lessons, but the all-white resources and environment had an effect of exclusion just the same. Subjects I, E, and K's stories demonstrate in different ways how Black students experience social isolation or exclusion due to exaggerated differences by white students. Thus, satisfying boundary heightening, the second prong of tokenism theory, allowing the students' experience to rightfully be categorized as an example of tokenism.

Additionally, some students were able to take advantage of these boundaries by emphasizing their own proximity to whiteness – even though it necessarily required them to turn “against members of their own category.”<sup>180</sup> For example, Subject C soberly recalls that he was

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<sup>177</sup> See Subject E, *supra* note 1, at 29:48.

<sup>178</sup> *Id.*

<sup>179</sup> See Subject K, *supra* note 153, at 10:04-10:28.

<sup>180</sup> See Kanter, *supra* note 3, at 228 (for quote).

well liked, and that status required him to view “whiteness and the proximity to whiteness as good.”<sup>181</sup> At all times, he altered his appearance to be “more presentable to white people” and to “show that [he] belonged among them.”<sup>182</sup> By constantly appealing to whiteness, he was able to be “brought into the circle of whiteness.”<sup>183</sup> This inclusion, however, came at a cost – Subject C recalls – for he had to be around when white students made derogatory statements about Black culture and labeled proximity to Blackness as “ghetto” or “hood.”<sup>184</sup> By Subject C’s own omission, he internalized these statements and ideas; so that even as a Black male, Subject C had a negative view of Black people that did not change until he left the PCS environment.<sup>185</sup>

The use of proximity of whiteness to draw lines of who would and would not be excluded highlights a unique way in which boundary heightening operates in this context: a reliance on colorism. Colorism is the belief that biracial or light-skinned Black people are superior to dark-skinned Blacks.<sup>186</sup> Like Black exceptionalism, colorism exists as a trope used by white people to explain accomplishments associated with Black people.<sup>187</sup> Also, like Black exceptionalism it is a concept internalized not only by white people, but by Black people as well.<sup>188</sup>

For the Black students interviewed, colorism played a huge part in observing which Black students were able to surpass boundaries erected to maintain white dominance in social groups. Immediately, Subject A noticed that other students responded better to her because she was light-skinned.<sup>189</sup> When asked whether she ever personally experienced any overt acts of

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<sup>181</sup> See Subject C, *supra* note 153, at 8:34.

<sup>182</sup> *Id.* at 8:34, 9:23.

<sup>183</sup> *Id.* at 9:59.

<sup>184</sup> *Id.* at 7:14.

<sup>185</sup> *Id.*

<sup>186</sup> See Ronald E. Hall, *The DuBoisian Talented Tenth: Reviewing and Assessing Mulatto Colorism in the Post-DuBosian Era*, 24 J. OF AFRICAN AMERICAN STUD. 78, 83 (2020).

<sup>187</sup> *Id.*

<sup>188</sup> *Id.* at 92.

<sup>189</sup> See Subject A, *supra* note 154, at 8:31, 7:26.

racism she responded, “not with me personally and I only say this because I felt like if they looked at me, they probably thought, oh, she’s better.”<sup>190</sup>

Unfortunately, this trope was not exclusively utilized by students. Subject G states that her cousins – who are sisters – attended PCS at the same time but one is light-skinned and one is dark-skinned.<sup>191</sup> In a class on slavery the teacher asked “if you’re Black, raise your hand.”<sup>192</sup> When the lighter-skinned cousin raised her hand, the teacher stated, “Oh no, not you, you don’t count.”<sup>193</sup> Again, affirming that the dominant group sets the boundaries on what counts and what does not count, who is included and who is excluded – making colorism a unique but relevant concept in terms of applying traditional boundary heightening to token Black students in private church schools.

### **Role-Entrapment & Micro-Aggressions**

*“I should have put him in his place a couple of times, but because I’m the Black guy, the only Black guy in the class, you know, you got to act a certain way.” – Subject K<sup>194</sup>*

In almost all the interviews, the participants described the difficulties that came with resisting or complying with stereotypes and roles based on their identities as Black students. Subject K’s experience was rooted in resisting the stereotype of the angry or violent Black man, even though he was not the aggressor in the situation.<sup>195</sup> Other students recalled moments where they felt bullied or accosted but chose to remain silent to avoid being “singled out and called out” due to the angry Black person stereotype.<sup>196</sup> Resisting the angry Black person stereotype operates as role entrapment because it prevents students from retaining their own individuality

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<sup>190</sup> *Id.* at 8:59.

<sup>191</sup> *See* Subjects F and G, *supra* note 1, at 1:04:43.

<sup>192</sup> *Id.*

<sup>193</sup> *Id.*

<sup>194</sup> Subject K, *supra* note 153, at 15:37.

<sup>195</sup> *Id.*

<sup>196</sup> *See* Subject B, *supra* note 155, at 13:32.

and instead traps Black students into responding to conflict by putting “up with everything and not saying anything” to avoid being an issue.<sup>197</sup>

The angry or violent Black person stereotype is not the only stereotype that interviewees resisted by changing their behavior. Subject H on two accounts resisted the stereotype that Black students were socioeconomically poorer than the white students. First when she was cast as the lead in a play only to later find out that the lead was the maid and second, when her friends would visit her house expecting something different than a nice house.<sup>198</sup> In the acting example, Subject H chose not to perform partly because her mother said that she was “not going to sit in a crowd of white people where you’re going to play a maid.”<sup>199</sup> For the house example, Subject H took it upon herself to show her friends that her “parents [were] paying tuition, just like [her friend’s parents were] paying tuition.”<sup>200</sup>

It is both exhausting and time-consuming to challenge stereotypes all the time.<sup>201</sup> Thus, it is unsurprising that participants were not able to resist all stereotypes and recalled examples of such stereotypes being applied to them – often by teachers. In academics, teachers assumed that Black students would not be interested in advanced or college prep courses. Leading one interviewee to recall the AP English teacher telling him that she did not think he should be in that classroom.<sup>202</sup>

Likewise, another student recalled that it took her mom coming down to the school ordering that she be enrolled in AP courses before the school would allow her to register for

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<sup>197</sup> Subject I, *supra* note 153, at 10:54.

<sup>198</sup> See Subject H, *supra* note 149, at 15:25 (for acting example) and 17:34 (for house example).

<sup>199</sup> *Id.* at 15:25.

<sup>200</sup> *Id.* at 17:34.

<sup>201</sup> Spangler et al., *supra* note 3, at 161.

<sup>202</sup> See Subject D, *supra* note 155, at 23:17-23:59. This participant is now an award-winning songwriter and poet despite hurdles placed on his so-called “ability” to be in advanced classes. *Id.*

those classes.<sup>203</sup> The most egregious recollection concerning academic stereotypes comes from Subject E. After finding out that the school had been providing incorrect information to football college recruiters for him and a friend, Subject E’s mom went to the principal for answers.<sup>204</sup> The principal’s response was simply that the school “didn’t know that [they] wanted to go to college” – an assumption that was made without any communication to Subject E.<sup>205</sup>

Students also observed stereotypes rooted in physical appearance. One particularly alarming account came from Subject C who shared this experience:

*You know, I’ve, I’ve had experience with, I have two brothers where, you know, one of my brothers who attended the school, told me that a teacher implied that he and another student had larger penises because they were black.*<sup>206</sup>

This recollection is particularly poignant because it is an example of an authority figure linking a sexual stereotype to a minor. Although not at the same level, the female students also recalled the influence of sexual stereotypes placed on their romantic relationships. When Subject H attended PCS in the 80s, interracial relationships were “strictly taboo.”<sup>207</sup> She would not dare say she had a crush on a white guy because that “would have been strictly forbidden.”<sup>208</sup> In fact, when a Black male student finally attended the school, teachers automatically tried to put the two together.<sup>209</sup>

Subject G also felt similar pressure from teachers to maintain this stereotype of Black students only being attracted to Black students and white students only being attracted to white students.<sup>210</sup> Students also maintained this stereotype, as Subject I recalls that white students

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<sup>203</sup> Subjects F and G, *supra* note 1, at 1:15:17.

<sup>204</sup> See Subject E, *supra* note 1, at 16:11.

<sup>205</sup> *Id.* at 18:53.

<sup>206</sup> Subject C, *supra* note 153, at 12:59.

<sup>207</sup> Subject H, *supra* note 149, at 11:11.

<sup>208</sup> *Id.*

<sup>209</sup> *Id.*

<sup>210</sup> Subject G, *supra* note 1, at 43:46.

would say things like “their dads would kill them if they brought home a Black girl.”<sup>211</sup> These examples demonstrate like all tokens, Black students’ experiences are constantly influenced by stereotypes and generalizations.

Like the other two tendencies of tokenism in this paper, exploring the experiences of Black students revealed a unique way that stereotypes and role entrapment are demonstrated in this context: the confirming role of micro-aggressions. Micro-aggressions are a more subtle form of racial animus that is often automatic and non-verbal.<sup>212</sup> In this context, Black students often experienced micro-aggressions that were based on stereotypes and that re-enforced those stereotypes.

For example, Subject E recalled how his Physical Education teacher prohibited Black male students from playing on the same team when the sport was traditionally a “Black” sport, like basketball or football.<sup>213</sup> Yet, Black male students were allowed to play on the same teams for sports not traditionally aligned with Black athletes, such as volleyball or soccer.<sup>214</sup> Or, for example, Subject I’s experience that other white students would give her positive reactions to her straightened hair but would give her looks that were like “yucky,” to her natural curly/textured hair.<sup>215</sup> These two examples of micro-aggressions reveal ways in which tokens can easily be stereotyped based on their salient racial identity; thus, micro-aggressions are helpful in gauging the extent of stereotypes/role entrapment in the context of token Black private church school students.

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<sup>211</sup> Subject I, *supra* note 153, at 14:00.

<sup>212</sup> Peggy C. Davis, *Law as a Microaggression*, 98 *YALE L.J.* 1559, 1565 (1989).

<sup>213</sup> Subject E, *supra* note 1, at 35:45.

<sup>214</sup> *Id.*

<sup>215</sup> Subject I, *supra* note 153, at 13:08.



For Kanter, the key to role entrapment is the assimilation of tokens to stereotypes to be accepted by the dominant group. For the Black students interviewed, it is apparent why tokens would choose this option. Interviewees recalled bullying or rejection that occurred when they did not adhere to certain stereotypes. For example, Subject D encountered stereotypes based on physical appearance when others made fun of him for being bad at basketball.<sup>216</sup> Subject G recalled being teased for “being an Oreo” because she wore “Pacs Sun stuff and Roxy.”<sup>217</sup>

Similarly, Subject I recalled that she was also made fun off for wearing, “cargo sweaters” and dressing, “kind of preppy for a Black girl.”<sup>218</sup> Faced with bullying and rejection, it is understandable that Black students would try and assimilate to stereotypes. Such assimilation has its own consequences, however, leading Subject J to recall that it took her a long time after school to “really embrace, you know, who I am without being put into a box.”<sup>219</sup>

As demonstrated by the prior examples, the Black students in this pilot study satisfy the definition of tokenism. Their increased visibility leads to performance pressure that is heightened by the trope of Black exceptionalism. The dominant group’s ability to decide who gets to be included and excluded via proximity to whiteness and colorism results in boundary heightening that can only be impeded by the Black students appeasing whiteness and disregarding their Blackness. Lastly, token Black students, are at risk for role-entrapment based on the existence of stereotypes confirmed and re-enforced by micro-aggressions. Therefore, tokenism exists in contemporary church schools – providing a counter-narrative to the official narrative that legal desegregation solved problems of inequality in these schools.

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<sup>216</sup> Subject D, *supra* note 1565, at 23:59.

<sup>217</sup> Subjects F and G, *supra* note 1, at 24:03.

<sup>218</sup> Subject I, *supra* note 153, at 10:22.

<sup>219</sup> Subject J, *supra* note 1, at 10:02.

### PART III: The Trauma of Tokenism

A counter-narrative of tokenism provides more than an alternative reading of the private church school desegregation story. It also provides unique insight into the ways that white supremacy can create cultural trauma for Black students in desegregated educational spaces.<sup>220</sup> Typically, trauma is understood as either a physical injury – such as blunt force trauma – or a psychological injury – such as post-traumatic stress disorder.<sup>221</sup> Psychological trauma is intimately connected to memory, in that, such trauma refers to some “memory of which is repressed and remains unhealed.”<sup>222</sup>

To the extent that this project focuses on the memories of Black students, it necessarily focuses on psychological trauma, but specifically cultural trauma instead of individual ideas of trauma.<sup>223</sup> Cultural trauma differs from traditional examinations of psychological trauma in that it is concerned with the way that individual recollections discuss threats to “the collective identity of a group.”<sup>224</sup> Thus, cultural trauma is the realization that a collective group has experienced events “that leave indelible marks upon their group consciousness, marking their memories forever and changing their identity in fundamental and irrevocable ways.”<sup>225</sup>

Yet, cultural trauma is not limited to one event, but is generally an “open-ended and contingent process.”<sup>226</sup> Using interviews – and by extension, narratives – to reveal this process of

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<sup>220</sup> Karida Brown argues something similar in her work examining the experiences of Black students who were the first to integrate public schools in Kentucky. *See* Brown, *supra* note 11.

<sup>221</sup> *See* Olick, *supra* note 114, at 343.

<sup>222</sup> *Id.*

<sup>223</sup> I make this distinction with the understanding that there is a plethora of literature on psychological trauma from a neurological perspective. *See, e.g.,* Olick, *supra* note 114, at 343; *see also* Brown, *supra* note 11, at 198. Any reference to trauma in this project is theoretical and does not seek to make any statement of diagnosis.

<sup>224</sup> Brown, *supra* note 11, at 198.

<sup>225</sup> *See* Pelak, *supra* note 115, at 309.

<sup>226</sup> *Id.*; *see also* Brown, *supra* note 11, at 198.

trauma is not a novel concept.<sup>227</sup> This is because narratives and memory contextualize trauma in a way that allows an individual to externalize the trauma and, in some cases, control the trauma by determining when to express something as traumatic.<sup>228</sup> As such, in order for cultural trauma to be discovered, individuals in the affected group must represent experiences as traumatic – even if they do not use the word “trauma”.<sup>229</sup>

Here, the token Black students experienced a certain level of cultural trauma due to their very existence as tokens in an environment designed and maintained by operations of white supremacy. When I asked Subject I about her overall experience she said, “I think they really failed us. They’ve really sort of like, were instrumental in inflicting, like, racial trauma on us.”<sup>230</sup>

While she was alone in using the term trauma, she was not alone in conveying this idea of distress due to the constant effects of racism and tokenism. For example, Subject H recalled being called the N word in class and nothing happening when she told the teacher observing the situation.<sup>231</sup> Specifically, she recalled that, “he rolled his eyes and acted like it wasn’t a big deal,” and she felt like he could have been more “understanding to [her] plight.”<sup>232</sup> What is especially telling about this story is that Subject H internalized this hurt and chose not to tell her parents in to avoid any further racial tension, but it still impacted her some thirty plus years later.<sup>233</sup>

Another student, Subject E, also recalled a traumatic experience he had in his senior year that still sticks with him ten years later. As mentioned earlier, there was a situation where the principal chose not to tell Subject E of college recruitment offers because he did not think that

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<sup>227</sup> See, e.g., *Introduction*, in *TRAUMA, MEMORY, AND NARRATIVE IN SOUTH AFRICA: INTERVIEWS* vii (Ewald Mengel, Michela Borzaga, and Karin Orantes eds., 2010) [hereinafter Mengel et al.]; see also Brown, *supra* note 11, at 199.

<sup>228</sup> Megel et al., *supra* note 228, at vii-xii.

<sup>229</sup> See Brown, *supra* note 11, at 199.

<sup>230</sup> Subject I, *supra* note 153, at 17:32.

<sup>231</sup> See Subject H, *supra* note 149, at 17:34.

<sup>232</sup> *Id.*

<sup>233</sup> *Id.*

Subject E wanted to go to college.<sup>234</sup> After this conversation, Subject E recalled that for a while after this incident he was a “little off at school.”<sup>235</sup> As a senior in high school, he just could not “fathom the idea,” of how someone could “jeopardize my future just because you don’t, I guess you presume you don’t like me.”<sup>236</sup> Subject E remembers this incident as one of the first racist experiences against him directly and states that it led him to “start dissecting every white person you’ve ever met in your life.”<sup>237</sup>

These examples are just a few that demonstrate the strain placed on token Black students in PCS due to their very existence as Black students. Internalizing racial tension, became as normal as breathing for Black tokens. As Subject F summarizes, “it was like a bubble around the Black group of kids at school. Like, it was just like, we knew they knew to treat us not like white kids.”<sup>238</sup> That collective bubble is an apt metaphor for the cultural trauma that surrounds these Black students as tokens.

Importantly, to say that tokenism is a source of trauma for these students is not to suggest that their time at PCS was all bad.<sup>239</sup> Many participants noted that some positive things came from attending the school, whether it be academic success or life-long friendships.<sup>240</sup> These positive memories, however, are not sufficient to disregard the cultural trauma associated with their experiences as tokens.

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<sup>234</sup> See *supra* notes 204-205 and accompanying text.

<sup>235</sup> See Subject E, *supra* note 1, at 19:32.

<sup>236</sup> *Id.* at 20:23.

<sup>237</sup> *Id.* at 26:57.

<sup>238</sup> Subject F, *supra* note 1, at 38:12.

<sup>239</sup> See, e.g., Subject A, *supra* note 154, at 14:54; Subject C, *supra* note 153, at 10:41; Subject H, *supra* note 149, at 25:37.

<sup>240</sup> In fact, Black solidarity was one of the best things to come from student experiences. Almost all the participants remain in close contact with the Black friends that they made at PCS. See Subject C, *supra* note 153, at 17:30; see also Subjects F and G, *supra* note 1, at 45:34; Subject I, *supra* note 153, at 07:50; Subject J, *supra* note 1, at 19:39.

If not for the sole reason, that none of the participants answered in the affirmative the question of whether they did or would send their children to PCS.<sup>241</sup> Of course, there were varying reasons for this decision, some of which have nothing to do with race.<sup>242</sup> And one participant, Subject H, stated that she thought about sending her kids there but when it came down to it decided that, “if there was a Black Christian school available,” that is where her kids should enroll.<sup>243</sup> Except for Subject H, all of the other “no” responses recognized, to a certain extent, that there was something traumatic about their experience – a trauma that they wanted to protect future Black children from.<sup>244</sup> As Subject C stated, “when you know better, you do better.”<sup>245</sup>

## CONCLUSION

The question remains, however, *can* we do better? The stories conveyed by the Black students in this study inform us that the integration efforts of the 50s, 60s, 70s, and 80s continue in the lives of Black children in the 21<sup>st</sup> century. The court may have enforced desegregation, but the presence of tokenism and the Black trauma it produces negates any confidence that true integration can or will be tolerated in these mostly segregated white spaces.

This paper has tried to demonstrate that simply stopping at the official narrative of desegregation is not sufficient to explore the continual influence that white supremacy maintains in private church schools. To stop at desegregation ignores the wealth of knowledge that exists in

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<sup>241</sup> See Subject A, *supra* note 154, at 14:30; see also Subject B, *supra* note 155, at 19:20; Subject C, *supra* note 153, at 28:02; Subject D, *supra* note 155, at 37:45; Subject E, *supra* note 1, at 52:59; Subjects F and G, *supra* note 1, at 1:04:27-1:04:30; Subject I, *supra* note 153, at 18:22; Subject J, *supra* note 1, at 20:46; Subject K, *supra* note 153, at 21:47.

<sup>242</sup> See, e.g., Subject B, *supra* note 155, at 19:20 (suggesting religious reasons).

<sup>243</sup> See Subject H, *supra* note 149, at 26:50.

<sup>244</sup> See, e.g., Subject E, *supra* note 1, at 52:59 (saying no because “they’re going to treat my son like they tried to treat me”); Subject K, *supra* note 153, at 21:47 (saying no because “you got the same teachers there. They’re still there so you got that same ideology, the same principles...I would never send my child there. Cause at that age, you know, your mind is very impressionable”).

<sup>245</sup> Subject C, *supra* note 153, at 28:02.

the memories of those who do the actual work of desegregating private educational spaces. Listening to Black students helps to reveal the missing story of tokenism and that tokenism sheds light on the ways that school aged children experience cultural trauma based on their racial status. The eleven former students who participated in this study are just the beginning. This process of using collective memory to reveal the trauma of tokenism complements scholarship on educational inequality and provides a blueprint for revealing the concealed influences of white supremacy in places like private church schools.

Thus, I would like to end the way that I began – with the election of President Obama. For it was in that moment, that most of the participants in this study began to reckon with the otherwise concealed influences of white supremacy in their school. It was a time where the “tension in the school was so thick” that the Black students in their senior year were scared for the younger Black students who could not escape by graduation.<sup>246</sup> Students (but this affected mostly Black students) were banned from speaking Obama’s name or calling him President for fear of being suspended.<sup>247</sup>

Even with such stifling, the students resisted – some refused to be in certain classes, some reached out to their parents to fight back against the administration, and some left the school after that year.<sup>248</sup> Subject K provides a sobering summary of the entire situation when he said in response to the aftermath of the election, “so we’re already minimizing our own self in that space and having to do it even more after, you know, what a lot of people would, would deem as a win for people of color. You know, that was just very, that left *a bad taste in my mouth.*”<sup>249</sup> For the

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<sup>246</sup> See Subject E, *supra* note 1, at 22:09.

<sup>247</sup> See Subject E, *supra* note 1, at 11:30; see also Subjects F and G, *supra* note 1, at 28:22; Subject K, *supra* note 153, at 12:00.

<sup>248</sup> Subject E, *supra* note 1, at 11:30 (for class resistance); Subjects F&G, *supra* note 1, at 28:22-31:10 (for fighting back against the administration); Subject K, *supra* note 153, at 5:17.

<sup>249</sup> Subject K, *supra* note 153, at 14:16 (emphasis added).

Black students at PCS, decades of seeking educational equality through integration efforts and hoping that education would be the catalyst for societal change was all ironically revealed to be futile in the election of our first Black president – leaving a bad taste in the mouth indeed.

**APPENDIX I**

Portsmouth Case Study <sup>250</sup>	<b>White</b>	<b>Black</b>
<i>City's Racial Demographic</i>	40.2%	52.7%
<i>City's Public-School Racial Demographic</i>	38%	52%
<i>Portsmouth Christian School's Racial Demographic</i>	70%	21.9%

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<sup>250</sup>All data from the National Center for Education Statistics, Private School Universe Survey and their Education Demographic and Geographic Estimates.



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