

REFLECTIONS ON *BROWN VS. BOARD OF EDUCATION* AND SCHOOL INTEGRATION TODAY

Lawrence Blum
University of Massachusetts Boston

In one of the most time-honored cases in the history of American jurisprudence, *Brown v. Board of Education* (1954), the Supreme Court, by a 9-0 margin, declared school segregation based on race to be unconstitutional. Fast forwarding to 2019, we live in a confusing time with respect to the legacy of *Brown* and the ideal of school integration. On the one hand, the school-age population is much more racially and ethnically diverse than it was in 1954; yet most white, black, and brown students attend schools that are not well integrated, and many are almost entirely segregated, with a trend among black and Latinx students toward increasing segregation since 1991.¹ More pertinent to social and political philosophy, the public standing of school integration as a social and educational ideal is much in doubt. Looking back to the *Brown* decision can help us revisit the meaning(s) of integration and the educational and social values it expresses, or fails to.

What did the *Brown* Court mean by “integration”: dismantling of white supremacy underpinning state-sponsored segregation, or ensuring that white and black students attended the same schools?

What did the *Brown* court mean when it ruled school segregation constitutionally impermissible and integration mandatory? An undeniable target were school systems organized on a principle of white supremacy, in which blacks and whites were assigned to different schools and the black schools were inferior. This aspect of school segregation was an integral part of the more general system of segregation that reigned in the Southern United States in that period.

The Court’s rejection of official and legally-enforced white supremacy in the education system was an undeniable advance for racial justice and has been much celebrated and embraced then and since for that reason.² But what did this ruling mean for ensuring the creation of schools in which whites and blacks actually attended the same schools and classes?³ The *Brown* Court assumed that dismantling official white supremacy would be followed by the multiracializing of school populations. However, if blacks and whites lived in separate

neighborhoods and areas, and schools were organized around a principle of localism (“neighborhood schools”), the two groups would not in fact end up in the same schools.⁴ A series of Supreme Court decisions in the late 1960’s and early 1970’s took up that challenge, saying it was not enough simply to reject white supremacy as an organizing principle for schools and to stop assigning students to schools based on their racial identities. These decisions said that creating schools with racially mixed populations was the prime goal, the true meaning of the “integration” mandated in the *Brown* decision, and that busing students out of their neighborhoods in order to create integration in that sense trumped the principles behind localism.⁵

Yet starting in 1974, continuing through the 1990’s and culminating in the *PICS* decision of 2007, the Court reversed the ’68-’73 direction, and permitted schools to assign students based on residence, without paying attention to the racial composition of the resulting schools.⁶ These rulings essentially construed the *Brown* mandate (which they did not challenge explicitly) to be (1) the rejection of white supremacy as an organizing principle for schools and school assignment policies, and, ultimately, (2) forbidding the use of students’ racial identity in school assignments. This construal is a clear misreading of the intent of the *Brown* ruling, in which school assignment based on race was forbidden precisely and only in its role in upholding the system of white supremacist segregation. However, the *Brown* decision did not in fact clearly distinguish integration-as-dismantling-white-supremacy from integration-as-students-of-different-racial-groups-attending-school-together.

Equal treatment as a third meaning of integration in *Brown*

That ambiguity then carried over to another one—whether when blacks and whites did attend schools together, they would be equal participants in and beneficiaries from the educational processes in classes and schools. The decision implied that it was only the stigma placed on black students by official Segregation, and the inferior school resources afforded them by the logic of white supremacy, that stood in the way of blacks and whites receiving equal educational opportunities. At the time of *Brown*, black teachers and teacher organizations warned about one further obstacle to that equality—that unless

white teachers were alerted to their own possible prejudices and the likely prejudices of many of the white students, the black students would not really be provided with a fully equal education.⁷ So equal treatment constitutes a third thread of “integration”’s meaning (in addition to dismantling official white supremacy, and ensuring actual racial plurality in schools), albeit an entirely implicit one, in the *Brown* decision. On this principle, integration is understood not as the mere co-presence of different racial groups in the same school, but also that the white teachers and fellow students treat the black students equally.

A quite different obstacle (from non-equal treatment) to the racial equality the *Brown* Court assumed would result from dismantling official Segregation surfaced in a report by the sociologist James Coleman that was commissioned as part of the 1964 Civil Rights Act.⁸ The Coleman report claimed that the socio-economic (including educational) characteristics of a student and her parents, and those same characteristics of a student’s classmates and their parents, accounted for more variation in students’ learning than did the school’s resources.⁹ Subsequent social science research has affirmed, refined, and expanded this insight, and the Coleman report remains an essential reference point for American educational research. It means that the school cannot entirely wipe away the impact the economic inequalities the students bring with them to school has on their learning. The *Brown* decision did not deny this, but it somewhat implied that students were “blank slates” in that their racial background, specifically the socio-economic characteristics that correlated with their racial status, would not affect their ability to learn at the same level as middle class students. Coleman threw this assumption into question.

The Coleman Report and the dependence of educational justice on socio-economic and racial justice

One implication of Coleman’s insight is that the outer society’s injustices inevitably affect the possibilities of achieving educational justice inside the school. If class inequality leads to educational inequality, a necessary condition of achieving educational equality is to end or at least strongly mitigate class injustice. As a social scientist, Coleman himself did not draw this specifically normative conclusion; and he also characterized class inequalities in the US at that time almost as if they were a part of the fabric of society that could not be

changed. But his findings imply that educational justice can be achieved only in tandem with other forms and aspects of race- and class-based justice.

This normative implication of Coleman's findings ties in with another limitation in the *Brown* decision. It did not recognize that doing away with the system of Segregation (in general, not only in schools) would not dismantle structural racial disparities that would block racial justice from being achieved. The later Civil Rights Act of 1964 and the Fair Housing Act of 1968 recognized some of these discriminatory barriers and attempted to remove them through preventing discriminatory action going forward. But these efforts could not and were not aimed to correct for the accumulation of unjust advantages whites had acquired historically over blacks because of previous discriminatory practices. To take just one now well-recognized example, whites were afforded the opportunity to buy homes, mostly in newly created suburbs, by means of inexpensive mortgages under policies begun in the New Deal in the 1930's, but blacks were barred from these programs. Whites could acquire equity in those homes, and pass that value, and sometimes the homes themselves, onto their offspring. Continuing discriminatory housing and real estate practices into the 1950's and '60's (and indeed into the present) contributed to the resultant disparities between black and white in home ownership and overall asset accumulation.¹⁰

These housing-related disparities constitute just one element in the continuing systemic racial disparities in income, wealth, occupation, health, and education that ending the system of official Segregation did not and could not fully correct for, although of course it did reduce the extreme disparities of the Segregation regime. One might say that the system of official Segregation was so salient and overpowering that it wasn't until its last legal vestiges were wiped away by the legislation of the 1960's that the deeper structures of unjust white advantage and black disadvantage could start to come into clearer view.¹¹

The failure to take on the larger structures of white supremacy that pervade American history is in no way a criticism of the *Brown* decision but simply a recognition that while it struck a vital blow for racial justice, racial injustice was embedded in a much more extensive and complex set of institutions

that outlasted the dismantling of state-sponsored segregation. And, in the spirit of Coleman's insight, but in a more distinctly racial form of it, those larger structures of injustice also stood in the way of school equality.¹²

The rise of the “diversity” framework crowds out racial justice

I have used the term “integration” to denote several distinct though related processes or values concerning the bringing together of students of different races in the same schools. But I have not mentioned “diversity,” which has become a much more frequent way of talking about such racial plurality in educational spaces, perhaps especially in higher education but to some extent also at the primary/secondary level. This historical semantic shift has important consequences. “Diversity” language arose as a result of a Supreme Court decision in the 1978 *Bakke* affirmative action case.¹³ Four justices saw affirmative action as a justice- or reparations-based program that gave racial preferences (in college admissions) to make up for a history of unjust exclusions from higher educational institutions.¹⁴ But the majority of five justices rejected this justice-based argument for affirmative action. However, one of them, Justice Powell, agreed that race could be used as a “plus” factor in admissions, but only to increase “diversity” in the student body, not to rectify injustice. (So a majority of five upheld the use of race preferences, but based on very different rationales.) This diversity rationale was later reaffirmed and strengthened in the majority decision in the 2003 *Grutter v. Bollinger* case.¹⁵

Because these decisions permitted race preferences in admission, but only to achieve diversity, not justice, colleges understandably tended to shift their discourse about affirmative action to “diversity” language, and indeed diversity thinking. The point of ensuring a “critical mass” (the 2003 decision's language) of racial minorities came to be seen as ensuring racial diversity in the student body, so that all students can benefit from hearing the outlooks, opinions, and experiences of a wider diversity of fellow students. With the increasing conservative grip on the Supreme Court beginning in the early-mid 1970's, there has never been a majority to reaffirm a justice or reparations-based purpose for affirmative action, and many younger people now think of affirmative action as

essentially a diversity program, not a justice program (though of course one can subscribe to both rationales).¹⁶

Racial justice retains a revealing ghostly presence in the majority decision in the 2003 *Grutter* decision. Justice O'Connor says, "By virtue of our Nation's struggle with racial inequality, such [racial minority] students are both likely to have experiences of particular importance to the Law School's mission, and less likely to be admitted in meaningful numbers on criteria that ignore those experiences." The latter statement comes close to saying that universities should admit racial minority students whose group has suffered historical injustice *because* they have suffered that injustice—as the justice rationale advocates. However, it does not say this. Rather it says that racial minority students' suffering from racial injustice contributes to the educational growth of other students, and that this growth is the foundation of the diversity argument for affirmative action for the minority students. One might say that the Court has declared that actually rectifying historical racial injustice is not a "compelling state interest" that would justify taking account of race in college admissions, but that discussing injustice in racially mixed groups is.¹⁷

The abandonment of racial justice as a goal of judicially permissible affirmative action is quite unfortunate; the alternative "diversity" rationale is much less morally substantial than justice. This development has contributed to demoting racial justice as an urgent necessity of our time.

But diversity does have educational benefits, including at K-12 levels

But this is not to deny that racial diversity involves genuine educational benefits, as the Court states. Indeed, those benefits provide important support for a similar diversity argument applied to the K-12 context—that is, for racial integration in schools. In a sense, the diversity argument is more powerful in the K-12 context, for several reasons—because it would provide benefits to all students, not only the much smaller subset that goes on to colleges selective enough to be able to practice affirmative action; because its benefits would accrue for more years of a students' life (twelve rather than four or somewhat more for the [even smaller] group proceeding on to graduate schools); and because the earlier students are exposed to peers of different racial groups in a

respectful educational setting, the better will they learn to understand, respect, and be comfortable with those of different races (a key aim of diversity at the higher education level according to the *Bakke* and *Grutter* decisions).¹⁸ In light of these considerations, it is striking that the “diversity rationale” has never garnered a majority in the post-1973 Supreme Court cases concerning K-12 integration, although some dissenting justices in those cases have indeed pointed to the Court’s affirming of diversity in the higher education affirmative action cases and declared it applicable to the K-12 context.¹⁹

I have pulled three different threads from the *Brown* decision concerning the meaning or values involved in integration—(1) dismantling the legal structure of the white supremacist system of Segregation; (2) affirmatively creating schools that bring together different racial groups; (3) doing the latter but also ensuring that students and teachers in those schools treat each other as equals. I have suggested that the decision did not clearly distinguish these three strands.

Civic value and integration in the *Brown* decision

There is yet a fourth normative strand in the decision which does not fit directly on the same scale as these three. It is the *civic* value of education and is represented in these famous words from the *Brown* decision:

“Today, education is perhaps the most important function of state and local governments. Compulsory school attendance laws and the great expenditures for education both demonstrate our recognition of the importance of education to our democratic society. It is required in the performance of our most basic public responsibilities, even service in the armed forces. It is the very foundation of good citizenship.”²⁰

The idea that education is valuable because it is the foundation of democratic citizenship is not the same as the equality-related values of the other three strands. It adds a new and vital element. Notice however that the decision does not explicitly say that the integrated character of schools is part of that civic value. It implies only that blacks must be provided with an equal education in order for them to access the civic value in question. The decision does not recognize that students need to be in schools with those of other races in order to

gain important civic knowledge, civic competences, and civic attachments across that racial divide that provide the foundation of good citizenship in multiracial democracies. These would be much more difficult to provide in segregated schools. Although the Court did not affirm this particular aspect of the civic value of integration (but only the need for blacks to have an equal education), it constitutes an important argument in favor of school integration that adheres to the spirit of the decision.

In addition to these pro-integration strands in the *Brown* decision, I have looked at limitations in the decision's vision of how integration or the broader goal of educational equality is to be achieved. The Coleman report surfaced the by now commonplace idea that class differences outside the school affect the possibilities for equality inside it, and suggest that educational justice requires some degree of economic justice in the broader society. In a similar spirit, the legacy of unjust racial advantage survived the dismantling of official segregation and presented a related and interconnected barrier outside school to in-school equality. Finally, subsequent Supreme Court cases progressively demoted the public standing of racial justice, including in education; the rise of the "diversity" framework for affirmation action was a key development in the judicial sidelining of racial justice.

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Integration now: the rise of the "capital" argument

Let us turn now to school integration in the present. I want to examine in some detail what has emerged as the most popular argument in favor of school integration—what might be called the "capital" argument, based on a concept drawn from the French sociologist Pierre Bourdieu. "Capital" refers to different forms of assets that can be used to improve someone's position in social, occupational, educational, and other life domains. There are four forms of capital—financial, human (education and skills), social (social networks by which information and opportunities are transmitted), and cultural (knowledge of and facility with the often unspoken norms and codes of conduct that govern access to advantages). Middle/upper middle class parents possess much greater capital of these forms than working class and low-income parents.²¹ Capital is primarily

class-based. But it has a disproportionate effect on race-defined groups because blacks, Latinxs, and Native Americans, on average, are of a disproportionately lower socio-economic status (SES) than whites.²² In addition, some forms of capital are directly race-based. For example, if white school personnel have a tendency to grant greater credence to the opinions and concerns of white than black parents of the same class, then some of the cultural capital the white parents possess in being better able to navigate the school terrain will be based directly on their race.

The capital argument for integration is that if disadvantaged and advantaged children are brought into the same schools, the advantaged families' capital can be leveraged for the benefit of the disadvantaged children, a benefit they will not have in economically (and thus generally also racially) segregated schools.²³ Compared to working class and low-income parents, upper middle class parents are better able to advocate on behalf of the school and its students, because they are better educated and better positioned to recognize how to go about such advocacy. They are better connected and more likely to know people who can help the school. They can deal more effectively with public officials, school administration, and staff. They are much better positioned to raise money (including their own) for their schools. Finally, these parents also generally have more time to engage in these activities, and to help out at the school, compared to the working class and low-income parents, because they have more flexible work arrangements (or one in a couple works less).

Richard Kahlenberg, who provides the most elaborated form of the capital argument, says, in the process of his argument for socio-economic integration (and thereby racial integration), that the presence of educated middle-class parents are the best guarantee of adequate resources for and quality in schools.²⁴

This parental capital argument is quite common in both scholarly and popular discourse about education. In addition, schools and districts often attempt to lure middle class/upper middle class families to a district, or incentivize them not to leave (if they already reside there), and to send their offspring to the public rather than private schools, without calling this

“integration” or appealing to a feature of integration to do so. The capital argument is operative in these initiatives even if no one says so publicly.

The parental capital version of the argument is often complemented by a student one—that middle class students have internalized norms of regular school attendance and doing homework, high standards for school achievement, and aspirations for college and higher status occupations, that the working class and low-income students’ families do not imbue their offspring with to the same degree. Schools dominated by (or at least with a critical mass of) upper middle class students are more likely to establish such norms in the school’s culture. In these schools, the working class students will to a significant extent take on these norms themselves, enhancing their school performance and benefit them as learners.

We remind the reader that the capital argument is meant (or at least any plausible version of it is meant) to operate only by comparing group averages among middle class and working class or low-income students. Some schools with primarily poor and working class black and Latino students have excellent parent associations that are skillful and seasoned in advocating for their schools and students, and may be better at doing so than many middle class white parent school-based groups. Low-income communities often have community-based advocacy organizations that can mobilize parents around educational issues. They have their own forms of social capital and may through action and practice have developed some degree of cultural capital, for example dealing effectively with school and district officials.²⁵ By definition working class and low-income parents do not have comparable financial and social capital to middle class parents, but some have learned to “work the system.”

It is important to recognize these exceptions to the generalization that economically and racially advantaged parents have more social, cultural, and personal capital than poor and working class families. Nevertheless, overall, well-to-do parents are significantly more involved in their schools than are low income parents; for example, a 2011 study finds that more affluent parents are four times more likely than low income parents to be members of a parent-

teacher association.²⁶ Overall they have a great deal more capital than low income and working class parents.

The capital argument implicitly draws on one aspect of the Coleman report, that the socio-economic characteristics of a student's classmates can affect her learning for better or worse, arguing that improving the SES status of low income students' classmates benefits them. And, indeed, the Coleman report was taken by many to provide an argument for racial integration on that very basis.

Criticisms of the capital argument:

I will argue, however, that the capital argument abandons the higher aspirations of the *Brown* decision—the equal treatment required by the 3rd version of integration, the civic equality and value (partly) affirmed by the civic strand, and the more general value of equal education aspired to in the decision but insufficiently provided for in its prescriptions and reasoning. The capital argument also abandons the justice aspirations I built off of the Coleman report—greater justice in the society at large, in part because it is required for true educational equality. The capital argument retains only the first two aspects of the *Brown* decision's affirmations of integration—dismantling of segregation, and bringing racially diverse students together.

Education benefits flow in only one direction: from advantaged to disadvantaged

To begin with, the capital argument's proposed educational benefits flow in only one direction, from the advantaged families to the disadvantaged students. The argument doesn't recognize that low-income students of color bring strengths, insights, experiences, and perspectives to the educational encounter, from which the white middle class students can learn and benefit. (This benefit is recognized in the "diversity" argument.)

While perhaps not explicitly denying reciprocal benefit, the capital argument ignores it, focusing only on the deficiencies of the black and Latino students that contact with the upper middle class white students partially compensates for. It is a form of what has been called the "deficit model" in which disadvantaged students are seen as little more than loci of socio-economic, racial, and educational problems, rather than children with learning potentialities and

resources that contribute positively to the educational encounter (notwithstanding the deficits).

The nonreciprocal character of the educational benefit is out of the spirit of the educational encounter as envisioned by the *Brown* judges. The decision sought to bring black and white students into shared educational spaces and tended to see that as sufficient for educational equality. The decision does not suggest that white students would be positive educational resources for the black students, but not vice versa. While, as mentioned, it did not focus on the ways students were educational resources *for one another* (as a civic perspective highlights), nevertheless, the *Brown* decision does project an egalitarian ethos strikingly absent in the capital argument.

It sends shaming messages of inferiority and deficiency to the disadvantaged

Related to its overlooking reciprocal educational benefit, the capital argument sends damaging inequalitarian messages to both the advantaged and disadvantaged groups (parents and children). The messages are conveyed when members of these groups are aware that the argument is being deployed in the school, for example when explicit efforts are made to attract more middle class families to the school; or when members of the school community make explicit or implicit reference (without necessarily recognizing that they are) to those arguments in interaction with others.

The central message to the disadvantaged students is that they and their families are deficient in central educational, and indeed life, resources—human, social, cultural, and financial capital. The demeaning and shaming message is something like, “You don’t have good study habits, you don’t work hard, your family is unable or unwilling to give you much help, they don’t have enough money or connections to help you out. Furthermore, you are a negative influence on your (working class and low income) peers, and they on you. To do your best learning, you need to get away from your friends, and be in classes with middle class students, though you won’t be benefiting them.” This message is demeaning and harmful to the student.²⁷

A parallel demeaning and shaming message is conveyed to these students’ parents—that they do not have the wherewithal to help their children succeed in

school, and, compared to the middle class parents, lack the finances, connections and know-how to help the school; and that, therefore, their children need to have structured access to middle class (generally white) students and parents in order to learn what they need to perform at their best level but that they contribute nothing in return.

The capital argument sends morally damaging messages of entitlement and superiority to the advantaged

The capital argument conveys the flip side of this inegalitarian message to the advantaged parents—a sense of entitlement (often unrecognized as such) that the school should first and foremost serve their children, and perhaps those like them, since after all it is these children’s presence in the school that is bringing (capital-related) benefit to the other children, but not vice versa. Wells and Serna quote a middle class parent voicing a version of this message—that because she pays higher taxes for the school than the disadvantaged families in the school, her child should be given priority, in placement in desirable classes, over the less advantaged children.²⁸ The message can be taken further, to imply that the advantaged are superior to the disadvantaged in an overall way, a view that, when racialized, reinforces a sense of racial superiority. This is particularly worth mentioning because we saw that a minimal understanding of “integration” means rejecting the legal foundations of a system based on white supremacy. But attitudes of white superiority can unfortunately but entirely understandably survive the dismantling of these structures.²⁹ Finally, these deleterious attitudes encouraged by the capital argument’s message can also take the form of a “savior” mentality that casts the advantaged as charitable and good-hearted benefactors to the disadvantaged, who should be grateful for the favors bestowed through the parlaying of the capital possessed by the advantaged. All these forms of a sense of unwarranted superiority are implicitly conveyed by the capital argument.³⁰

These deleterious messages resonate with familiar, powerful ideologies in society implying that people’s disadvantages in life situation are largely their own fault, and are thus an appropriate source of shame; and, on the other side, that the advantages of the economically successful are a product purely of their own

talent and effort, for which pride and entitlement are warranted and appropriate. (The ideology is sometimes referred to as “meritocracy,” or, more colloquially, as “pull yourself up by your bootstraps.”) This class-centered ideology coexists with representations of Native Americans, Latinxs, and, especially, blacks as intellectually or culturally inferior; so the ideologies of class and race inferiority reinforce one another. Current white advantage over blacks and Native Americans, and, though to a somewhat lesser extent, Latinxs, is primarily a product of a history of discrimination against those groups and its uncorrected legacy into the present.³¹ The class and the race ideologies together with the capital argument provide an unwarranted sense of entitlement and superiority in white, upper middle class people, and encourage shame and diminished self-respect in low-income blacks, Native Americans, and Latinxs.

The capital argument operates outside of a racial and class justice perspective

The capital argument’s problematic messages arise because that argument operates outside of a justice framework, of a combination race and class character, mentioned earlier (xxx). At best, the capital argument takes the capital disparities among different racial and SES populations as an uncriticized given. It does not ask why the lower income families have such notably lesser capital of all forms than the upper-income families, but just takes the fact that they do as a starting point. In doing so it tacitly accepts the class- and race-based ideologies of entitlement and shame just mentioned. At worst the argument positively embraces these false ideologies of racial or class superiority (e.g. their “meritocratic” form).

The pure capital argument’s omission of a justice perspective is morally and intellectually damaging to white upper middle class students. They are not provided with an accurate picture of the society they live in and their place in it, the structures of injustice (of both a racial and class character) within which they function and from which they benefit. They fail to see that their own advantages are substantially due to a history of injustice they inherit, and so they are rendered vulnerable to the misplaced sense of entitlement mentioned above. They are left with the impression that the resource differences between their families and their less advantaged peers result purely from their parents being

smarter, more talented, and harder-working than the latter's parents. They are vulnerable to developing morally damaging attitudes of superiority and self-satisfaction in relation to their disadvantaged peers, bolstered by stereotypic cultural tropes that attribute deficiencies to those groups. Unless their education is firmly grounded in a justice perspective, they will not develop a robust sense of justice nor be encouraged to recognize that the disparities between their classmates and themselves exemplify injustice.

Capital argument messages impede egalitarian school community

These messages of the capital argument are likely to impede the creation of a successful school community, among both parents and children, one animated by a sense of equal respect, participation, and appreciation. That school community is in line with the "equal treatment" version of integration (above, xxx), expanded to embrace the families of the students in question. They discourage the disadvantaged families from feeling that they have equal standing and are equally welcomed to voice their perspectives and concerns in school settings. It conversely encourages the advantaged to regard those families as less valuable to the community and to have less to contribute to it than themselves. In newly gentrifying schools, low-income parents who have worked for many years to improve the school sometimes feel the newer high-income parents fail to recognize and credit their efforts.³² The capital argument's messages encourage that lack of recognition. Learning to interact respectfully with differently-advantaged racial "others" is challenging; having signed on to a justice-based way of thinking about education, and one's school more specifically, can help provide the perspective and the motivation to do so.

The justice perspective helps us recognize that some of the cultural capital of advantaged families in interacting with school and district personnel is more accurately characterized as unfairness and inappropriateness in how those personnel treat persons of different class and racial backgrounds. If they afford more credibility to the white or middle class parents and their concerns than to the non-white working class parents (see above, xxx), this is wrong and contrary to their professional responsibilities. A familiar example is the use of professional language such as "language arts skills" and "sight vocabulary," that working class

and low-income parents are less likely to be conversant with than more educated parents.³³ School personnel do not have to use that type of language in talking with parents. They can learn to talk in a way that all parents can understand and through professional development can learn about class- or race-related differences to help them treat all families with equal care, attention, and respect?

By leaving class and race-based disparities uncriticized, the capital perspective also discourages the white upper middle class parents from recognizing that justice may require some diminishment of their unjust class- and race-based capital advantages. As mentioned earlier, the strong impact of out-of-school factors on school performance and learning means that in-school equality cannot be achieved without changes in the economic and racial structures within which the school is set. Some advantaged people will have to give up some of their advantages in service of the (more) just social order required for educational justice.³⁴ The capital perspective implicitly construes that possibility as off the table.

Finally, the capital argument provides an inadequate civic foundation for equal education, contrary to the civic strand in the *Brown* decision. Good schools should be a matter of public entitlement. If schools are not being adequately funded and staffed, parents should be able to demand the funding and staffing as a matter of justice due them as citizens. Many states have declared that demand to be a (state) constitutional right, generally in response to legal suits challenging their school funding formulas.³⁵ Looking to the recruiting of middle class parents to agitate for adequate funding outsources a public responsibility to private citizens, and casts the disadvantaged families in a position of supplicants or grateful recipients rather than equal citizens.^{36, 37}

Schools and teachers can adopt the justice perspective as part of their educational mission

So a fundamental problem with capital arguments for integration is their exclusion of an economic and racial justice perspective on society, education, and the capital disparities on which the argument rests. Schools can themselves adopt such a justice perspective, viewing their educational program and their school mission as contributing to rectifying a history of race- and class-based injustice and aiming to bring about justice in the future. They can make justice-related

education an explicit part of their curriculum. They can encourage parents across the race and class spectrum to buy into that perspective, and to embrace this justice project as something to take pride in in their school, and in their own ability to contribute to it.

Districts can do this as well, and a number of school districts around the country have, in that spirit, adopted “equity” policies and guidelines.³⁸ These policies generally make reference to achievement or opportunity gaps the district says it will try to close up, and may explicitly focus on resources to meet all students’ needs, pedagogy and curricula sensitive to students’ different backgrounds, life situations, and cultures. One district even recognizes structures of injustice; it says it will “identify and address structural and institutional barriers that could prevent students from equitably accessing educational opportunities in all schools.”³⁹

Advantaged parents are capable of signing on to a justice mission for their offspring’s schools

Some might reply that advantaged parents will never sign on to a program that challenges their privileges, perhaps even feeling that as a parent they have an affirmative obligation to promote their child’s interests to the fullest extent and to exit a school that challenges their ability to do so. Even if there were a conflict between parental responsibility and educational justice, it would be important to name that as such, rather than simply giving up an aspiration to educational justice in the face of advantaged parent intransigence. If we are to abandon justice in the name of a lesser, possibly more realizable, goal, we must at least acknowledge that abandonment and affirm justice as an appropriate standard. However, we should not prematurely abandon justice before examining whether the conflict with (advantaged) parent responsibilities and prerogatives is as stark as this line of thought implies.

There is evidence that some white parents’ outlook already coheres at least in part with the demands of educational justice, not seeing a stark conflict with their obligations as a parent. These parents view what is “good for my child” in a way that either takes justice concerns into account as part of that good, or as sometimes overriding maximization of their children’s benefit. They do not see

maximizing competitive academic advantage or purely academic values as defining what they should aspire to for their child with respect to schooling.

One study of a school in a gentrifying, urban neighborhood focuses in part on a group of white parents who sent their children to a school that was 10-15% white. One such parent says, “I felt that we could provide a lot of support for academics for our children, but one thing we could not provide was working ...and playing with a socio-economically diverse group of kids.”⁴⁰ This parent is not articulating a distinctly justice-based value stance; but she is putting her child in a minority-white school and throwing her support behind that school, sacrificing some academic benefit to her child for what she sees as a greater enrichment to him of knowing children of different races and socio-economic backgrounds. The rejection of a pure academic-centric and competitive advantage way of thinking about their children’s good is a step toward a more justice-oriented way of thinking about them and their schooling. The same study cited another parent saying, in reference to the same school as the previous parent, “Morningside’s not the right place if you think your child is the center of the universe. You know, I always feel like I chose public education because I’d rather choose what’s good for lots of people over what’s necessarily the very best for my kid.”⁴¹ This parent goes beyond the previous one in viewing her educational choice for her child as aimed at what would benefit many children, even if doing so would come at some cost to the child’s academic advancement. Her statement at the end could be construed as saying that she is assessing the proposed school as *good enough* for her child, but not “necessarily the very best.” She is not forswearing parental concern for her child’s well-being but is rejecting a maximalist way of looking at it.

A particularly striking example of affluent white parents supporting a social justice mission of their schools occurred in Montgomery County, Maryland, where a superintendent utilized a robust understanding of “equity”—providing not merely equal but greater resources to lower-income schools than to affluent schools—to gain support from affluent parents for a funding scheme in the district.⁴²

Adoption of a justice perspective would encourage schools and teachers to craft curricula that pay attention to racial (and class, since they are so bound up together) injustice. Such curricula would help the black, Latino, and Native American students understand the historical and social foundations of their experiences and their disadvantaged life situation, and take pride in their people's resistance to, and persistence in the face of, historical injustice. It would provide them with moral and psychological resources to avoid the shame and demoralization concerning their current circumstances that the capital argument encourages. Such curricula would help the advantaged children see the importance of learning about race in America. It would position the black and Latino students as important resources for the white students' learning, rejecting the one-way educational benefit animating the capital argument. Doing so would help the advantaged students gain a realistic picture of how their society operates, including the race- and class-based processes that generate the injustices from which they benefit. It would help them to see the disadvantaged students as equals, as having merely had the misfortune of being born into disadvantage in an unjust society.

The racial justice perspective helps address a concern that the advantaged parents' may be disposed to use their various forms of capital for the sole benefit of their own offspring rather than for the whole school community. They do this at least partly to give their child competitive advantage over other children, for example regarding placement in higher track classes and college admission. Were the black and Latino students in their child's school to start performing as well as the white students, so that they started gaining admission to selective colleges at comparable rates, this might give some of these white parents pause about using their forms of capital to help those students.

A racial/social justice perspective challenges this narrowly familial-interest orientation, while a capital perspective alone does not. The latter relies at best on ways that advocating for the school as a whole *also* benefits the particular parent's own child. The justice perspective provides moral and psychic resources to expand the parents' mental and moral horizons to embrace the whole community for its own sake through seeking educational justice.

Structural features promoting moral narrowness among advantaged parents: the “winner-take-all” society

We must also recognize structural features of our current socio-economic order that encourage advantaged parents to be laser-focused on their offspring’s comparative school performance (not necessarily their actual learning.)

Intensifying inequality has increased the spread between rewards of different jobs in the occupational hierarchy, and reduced the number of jobs upper middle class people regard as well-remunerated. This situation is frequently characterized as a “winner-take-all” society, in which rewards flow increasingly to the very top most successful persons in various domains, leaving everyone else behind.⁴³

These developments have caused understandable anxiety across the whole economic and racial spectrum of society about the next generation’s prospects. They suggest that it is not merely a free-floating narrow-mindedness or selfishness that prompts upper middle class whites’ offspring-focused capital deployment, but developments in the larger society that incentivize doing so. At the same time, the intensification of inequality constituting these developments also increases the urgency of a justice lens on education and society—and specifically the need to link struggles for educational justice, inside schools and out, to larger struggles for justice in society.⁴⁴

The capital argument possesses no resources to recognize ways that advantaged white students can actually benefit from integrated schools, since its focus is entirely on disadvantaged students’ deficiencies. The justice perspective helps reveal these potential benefits. Advantaged students acquire a more accurate view of their society, and their inherited place in it. They are thereby better informed and positioned to work out how they want to live their own lives, and engage with their society, in light of this knowledge. They are less hampered by stereotypes, cultural images, and ideologies concerning students of color and lower income students. This better positions them to relate to “ethnoracial others” as fellow students, co-workers, friends, and down the road, fellow citizens. It enriches their understandings and their lives in these ways.

Sometimes the capital argument is framed as an “equality” argument, but this is misleading. It is best understood as a “benefit to the disadvantaged” argument. Even on its own terms, the advantaged families preserve capital advantages over the disadvantaged that according to the argument is the source of educational improvement; so this improvement remains unequal. This is not to deny the benefit argument or to demean its significance. The benefits to the disadvantaged might be genuine and much less readily secured in segregated schools. But the argument does not rest on a process that can possibly secure equality of education.

To sum up, I have argued that the *Brown* decision was the source of several distinct values the justices attached to school integration (sometimes only implicitly)—rejection of white supremacy as embodied in the system of Segregation; racial equality in education (including equal treatment inside schools); and the civic importance of education. But the decision also failed to recognize the full scope of what would have to change in society to bring about real educational justice and equality. It seemed tacitly to assume that newly desegregated schools mandated by the decision would treat black students equally with whites, rather than recognizing that making that happen would be part of a struggle for the equality declared and hoped for by the decision. And although it recognized the systemic character of Segregation as a barrier to equality, it failed to see the deeper structures of racial injustice, infused with class injustice, that would survive the end of Segregation and remain as a barrier to full school-based equality. Finally, the decision recognized the civic importance of education, and of everyone equally having access to it, but did not articulate the civic educational value of having students of different races educating each other.

I have argued that the capital argument, the predominant argument for integration in the present, whatever its merits, abandons the main two ideals articulated in the *Brown* decision and often associated historically with the struggle for integration—equality in education, and the civic purpose of education. In addition, I have argued, the capital argument entirely abandons the larger goal of justice in society and its links to equality in education. The capital argument is instead premised on accepting, taking as a given, or even positively

affirming, the injustices reflected in the substantially divergent amounts and forms of capital possessed by upper middle class white people and working class and low-income people of color, especially blacks, Latinos, and Native Americans. In doing so, the capital argument not only fails to seek justice but gives aid and comfort to injustice in education. I have also suggested that the Supreme Court's progressive abandonment, since 1974, of a justice and rectificatory foundation of affirmative action, and its substitution of a "diversity" rationale, has contributed to the weakening of a justice perspective specifically in education, at both higher education and K-12 levels.

The capital benefits of integration are, however, real. Sometimes disadvantaged students can indeed benefit from the capital that middle class parents and students bring to the school and to its classrooms. Many working class parents believe their children do benefit from being placed in middle class schools. But these benefits can be garnered without the morally deleterious effects of relying on the capital argument—puffing up the advantaged with entitlement and superiority and inferiorizing the disadvantaged with shame and demeaning—only by embedding the capital benefits within a justice framework on schooling generally and school integration specifically, with the school community taking this perspective on board. Only with a justice framework can these dignitary and moral harms be avoided, by providing both disadvantaged and advantaged students with the cognitive and moral resources to achieve a sense of equality within the school community, in which they see each other equally as resources for their own educational and personal growth.

Moreover, bringing this justice perspective into a school community is not just a utopian dream, doomed to failure by the impossibility of muting or eliminating the opportunity hoarding of the advantaged parents—that is, their unshakeable investment in advantaging their offspring above other students in the competition for academic success. Some schools, many teachers, and even whole districts have committed themselves to "equity" in their schools, and many white parents, even if perhaps a minority at the moment, recognize the structures of injustice that keep black and brown students in inferiorized statuses in and out of schools. Many of these advantaged parents can be brought around

to a justice perspective on their children's schools, and indeed many of them advocate for social justice in and out of those schools. This is not to deny that the forces invested in the injustice are widespread and powerful, and an understanding of those forces must animate any efforts for justice. But the vision of racial inequality bequeathed us by *Brown*, and updated for the limitations of that decision, is still worthy of our aspiration.

¹ Gary Orfield, Jongyeon Ee, Erica Frankenberg, Genevieve Siegel-Hawley (for the Civil Rights Project/Projecto Derechos Civiles, which has tracked school segregation and integration trends for several decades), *Brown and 62: Segregation by Race, Poverty, and State*, May 16, 2016 (UCLA). Whites have declined to 50% of the school population (down from 79% in 1970 and 69% in 1988), contributing to less segregation for whites. Latinxs have increased from 11% in 1988 to 25% in 2013, contributing to greater segregation for that group. (But increased segregation is due to multiple factors, not only demographic change.)

² It should be noted, however, that the language of “white supremacy” is never used in the decision. The Court used that language in its 1967 ruling against bans on interracial marriage, in *Loving v. Virginia* 388 U.S. 1 (#395): “The fact that Virginia prohibits only interracial marriages involving white persons demonstrates that the racial classifications must stand on their own justification, as measures designed to maintain White Supremacy.” But it is plausible to see part of the wrong in the Segregation system, recognized in *Brown*, to be its foundation in white supremacy, as recognized explicitly in *Loving*.

³ The *Brown* decision focused on whites and blacks, but the ruling had implications for other racial groups—Asian Americans, Latinxs, and Native Americans—as well, depending on various, often local, factors. For example, sometimes Mexican Americans were counted officially as white and were separated from conventional whites on the grounds that this could not count as segregation since they were seen as white on the federal census. But in other locales Mexican American were grouped with blacks. For a detailed account of this matter see L. Blum and Z. Burkholder, *Integrations: The Struggle for Racial Equality and Civic Renewal in Public Education* (forthcoming, University of Chicago Press, 2021).

⁴ Historically, residential segregation was not the only reason schools did not become integrated. Essentially, the Southern states governed by the decision stonewalled the decision, and were not forced to comply until after the 1964 Civil Rights Act put the power of the federal government behind integration.

⁵ The main cases were *Green v. County School Board of New Kent County*, 391 US 430 [1968] (school districts must dismantle segregated systems “root and branch”), and *Swann v. Charlotte-Mecklenberg Board of Education*, 402 U.S. 1 (1971) (ruling against school segregation due to residential segregation, approving of busing as a means to do so).

⁶ There are many relevant cases here, not only ones explicitly about education but about affirmative action in employment also, as these concern the permissibility of race as a category of public policy. I’ll just mention, *Milliken v. Bradley* 418 U.S. 717 (1974) (blocking interdistrict urban-suburban desegregation plans unless it could be proven that the suburban district contributed to the segregation in the urban district, a standard of proof very difficult to meet); *Parents Involved in Community Schools [PICS] v. Seattle School District No. 1*, 551 U.S. 701 (2007) (a student’s racial identity cannot be utilized in a school assignment scheme, even if doing so is the best or even only way to ensure racial integration in the schools in a district). Several of the other education cases (e.g. *Missouri v. Jenkins* [1995]) involved lowering the bar for releasing districts from mandates or consent decrees to integrate their schools.

⁷ Black teachers were, however, generally supportive of integration, in part because the facilities that would become available to the black students would be vastly superior to those in the segregated schools; and because the teachers had hopes that over time that whites would shed their anti-black prejudices. Vanessa Siddle Walker, *The Last Education of Horace Tate: Uncovering the Hidden Heroes Who Fought for Justice in Schools* (New York, NY: New Press, 2018).

⁸ James Coleman and others, *Equality of Educational Opportunity* (Washington, CD: National Center for Educational Statistics 1966)

⁹ “[T]he inequalities imposed on children by their home, neighborhood, and peer environment are carried along to become the inequalities with which they confront adult life at the end of school.” Quoted in Eric Hanushek, “What Matters for Student Achievement,” *Education Next*, Spring 2016, p. 20. Coleman did not have income data on the parents because the students were his source of information about the education-relevant socio-economic characteristics and he did not think they were reliable sources for income information on their parents. (p. 23).

¹⁰ Forms of these discriminatory practices have continued into the present despite being forbidden by the 1968 Fair Housing Act and other anti-discrimination laws. Richard Rothstein recounts the process of housing discrimination and its results in segregated neighborhoods and more general inequality in *The Color of Law: A forgotten History of How Our Government Segregated America* (New York, NY: Liveright 2017). (Rothstein is building on pioneering work of other scholars such as M. Oliver and T. Shapiro, *White Wealth/Black Wealth: A New Approach to Racial Inequality*, 2nd edition [New York, NY: Routledge 2006].) For other processes contributing to black-white housing

disparities see Keeanga-Yamahatta Taylor, “How Real Estate Segregated America,” *Dissent*, Fall 2018: 23-32.

¹¹ An exception to this historical blindness was the tradition of black radicalism that recognized structural racism other than the segregation system, e.g. W.E.B. DuBois, *Black Reconstruction* (1935).

¹² One important difference between the injustices Coleman pointed to (though not noting them to be injustices) and those just mentioned is that the latter were almost entirely racial in character. Blacks were excluded from programs and processes from which whites benefited. By contrast the social inequalities Coleman saw as impacting education were of an entirely class-based nature (although Coleman was interested only in how these processes affected race-defined groups, in line with his charge from the Civil Rights Act). In general class injustices are so bound up with racial ones that it is generally impossible to tease them apart. Racial oppression has resulted, in part, in blacks having diminished socio-economic status, but that status then rendering them vulnerable to further class-based injustices. A simple example: undergoing inferior schooling because of one’s race renders one less competitive for decent jobs, which in turn results in lower income.

¹³ *Regents of the University of California v. Bakke*, 438 U.S. 265 (1978)

¹⁴ Here is one example language from the four-justice dissent in the *Bakke* case that affirms the constitutionality of affirmative action for the purposes of remedying the effects of past discrimination, that is, for a social justice purpose: “Government may take race into account when it acts not to demean or insult any racial group, but to remedy disadvantages cast on minorities by past racial prejudice, at least when appropriate findings have been made by judicial, legislative, or administrative bodies with competence to act in this area.” (325).

¹⁵ *Grutter v. Bollinger*, 539 U.S. 306 (2003). The *Grutter* decision concerned law schools but was taken to permit race preference in college admissions also.

¹⁶ In his influential history of admissions policy at Harvard, Yale, and Princeton, Jerome Karabel shows that in the late 1960’s, Harvard admitted black students whom they did not think met the (then) commonly-utilized criteria for admission, who were from working class, “inner-city” [Karabel’s term] backgrounds. The University believed that violating “meritocracy” in this way was justified by the greater imperative to admit a larger number of black students and by a recognition that these students did not have access to pre-college educational advantages the white admits had. Karabel shows that within a few years, however, Harvard shifted its admissions policy regarding blacks, so that in 1973, 75-80% of the admits were “not from disadvantaged backgrounds,” as they were also increasingly using “diversity” language in their admissions discourse. Karabel, *The Chosen: The Hidden History of Admission and Exclusion at Harvard, Yale, and Princeton* (Boston: Mariner Books, 2005), 400-405.

¹⁷ “Compelling state interest” has come to be the legal language articulating the standard required for a policy that takes race into account to pass constitutional muster. Ellen Berrey demonstrates how the dominance of “diversity” language and thinking has sidelined racial justice in national and university discourses:

The Enigma of Diversity: The Language of Race and the Limits of Racial Justice (Chicago, IL: UChicago Press 2015).

¹⁸ On the normative resources provided in the higher education affirmative action cases that can be used at the K-12 level, see L. Blum, *High Schools, Race, and America's Future: What Students Can Teach Us About Morality, Diversity, and Community* (Cambridge, MA: Harvard Education Press, 2012), "Conclusion."

¹⁹ For racial justice themes in dissents in K-12 cases, see Justice Breyer's dissent in *PICS* case. I don't mean to imply that the jurisprudentially relevant factors at the K-12 and higher education levels are entirely the same.

²⁰ *Brown*, 493.

²¹ The terminology of "middle class" bears some comment. It has no clearly standard definition, but the middle 60% of the income spectrum (20% above, 20% below) seems reasonable. However, frequently the "middle class" people to whom capital is attributed in the capital argument are really more like the educated professional, "upper middle," class (being able to advocate successfully with district officials and politicians for example). I sometimes use "middle/upper middle" when the context seems to render that preferable, or just to remind the reader of the fuzziness around this terminology.

²² Asians have a higher mean income than whites, but some Asian groups (Hmong, Thai, Cambodians, Bangladeshi) have incomes closer to Hispanics (higher than blacks and Native Americans). G. Kao, E. Vaquera, K. Goyette, *Education and Immigration* (Cambridge, UK: Polity 2013), 98.

²³ Richard Kahlenberg sets at 50% the critical mass of middle class families required for the capital processes to have the effect required by the capital argument. *All Together Now: Creating Middle Class Schools Through Public School Choice* (New York, NY: Brookings Institution 2001), 9.

²⁴ Kahlenberg, *All Together Now*, 1, 62. Kahlenberg is not concerned about racial integration in its own right, but only as a byproduct of socio-economic integration; but he recognizes that his argument for the latter will be appealing to those whose aim is racial integration.

²⁵ Andres Alonso, "Pandering in a Context of Limited Choices and Costs," in M. Levinson and J. Fay (eds.), *Dilemmas of Educational Ethics: Cases and Commentaries* (Cambridge, MA: Harvard Education Press 2016), 168.

²⁶ R. Kahlenberg, "Turnaround Schools and Charter Schools That Work," in Kahlenberg (ed), *The Future of School Integration: Socioeconomic Diversity as an Education Reform Strategy* (New York, NY: Century Foundation Press 2012), 286.

²⁷ Kahlenberg argues that the message of deficiency is indeed stigmatizing, but only in its racial, not its socio-economic, form. But his argument for this is unconvincing. He says that the argument casts the culture of blacks in a negative

light, but that poor people do not have a culture that forms part of their identity in the same way, and so are not insulted by the attributions made. (“The poor generally do not wish to preserve a culture of poverty.” Kahlenberg, *All Together Now*, 197.) The reference to culture is a red herring. It is the student in an educational setting who is vulnerable to the stigma that she is declared or implied to be deficient in exactly the qualities required for success in that venue. That stigma is directed toward a group of students, not a culture.

²⁸ A. Wells and I. Serna, “The Politics of Culture: Understanding Local Political Resistance to Detracking in Racially Mixed Schools,” in S. Anderson, P. Attwood, L. Howard (eds.), *Facing Racism in Education*, 3rd edition, (Cambridge, MA: Harvard Educational Review 2004).

²⁹ Charles Mills emphasizes a more general version of this point, that structures of white advantage, as well as attitudes of superiority that generally accompany them, can survive the dismantling of their legal underpinnings. Mills, “Revisionist Ontologies: Theorizing White Supremacy,” in *Blackness Visible: Essays on Philosophy and Race* (Ithaca, NY: Cornell 1998). Indeed Mills refers to the “system” of white advantage in the US today that has outlasted the end of segregation as “white supremacy,” rightly linking it to the attitudes of superiority that obtained under Segregation but still obtain, in somewhat different form, in society today, as I have argued is implicit in the messages of the capital argument.

³⁰ It is also worth noting that the capital argument paints an overly rosy picture of the norms conveyed by the advantaged to the disadvantaged students. Studies of upper middle class students often find them to be overly entitled, disrespectful toward adults, overly competitive, materialistic, and uncaring toward others. If the upper middle class students pass positive norms about school engagement to the students of color, mightn’t they pass negative norms on as well? E. Anderson, “Race, culture, and educational opportunity,” *Theory and Research in Education*, vol. 10, #2, July 2012 (“To put the point bluntly, they are spoiled”), 117.

Kahlenberg concedes, “The middle class can be uptight, boring, uncaring, materialistic, and hypercompetitive.” *All Together Now*, 194

³¹ The reason Latinos’ SES disadvantage is less a product of past discrimination than blacks and Native Americans is that a sizable percentage of Latinos are immigrants, whose current disadvantaged socio-economic status within the US is partly a product of their (or their parents’) original point-of-immigration lower SES.

³² Linn Posey-Maddox, *When Middle-Class Parents Choose Urban Schools* (Chicago, IL: UChicago, 2014)

³³ Example of teachers using professional language some parents won't understand is from Annette Lareau, *Unequal Childhoods: Class, Race, and Family Life* (Berkeley, CA: University of California 2003), 210

³⁴ I argue that, rightly construed, just educational policies promote the good of advantaged white people, especially students; but they may also require some sacrifice from them. Blum and Burkholder, *Integrations*

³⁵ M. Rebell, *Flunking Democracy: Schools, Courts, and Civic Participation* (Chicago IL: UChicago, 2018) describes the legal suits regarding school funding, and their civic import.

³⁶ On treating disadvantaged families as grateful supplicants rather than equal citizens, see T. Shelby, *Dark Ghettos: Injustice, Dissent, and Reform* (Harvard, 2106), 69

³⁷ An argument for the public responsibility of citizens for their public schools in a democratic society is well made by Sarah Stitzlein, *American Public Education and the Responsibility of its Citizens: Supporting Democracy in the Age of Accountability* (New York, NY: Oxford 2017)

³⁸ “Equity” is now the official language of choice in the current educational landscape for talking about educational and education-related justice.

³⁹ From “Equity Policies in Maryland”, a report for the Teachers Democracy Project, an advocacy and resource organization for educational justice in Baltimore, noting six Maryland counties that have adopted such policies. The quote is from Calvert County.

http://www.calvertnet.k12.md.us/UserFiles/Servers/Server_123339/File/Calvertnet/District%20Info/CCPS%20Policies%20and%20Procedures/Administration/1015.pdf

⁴⁰ Posey-Maddox, *When Middle-Class Parents*, 69.

⁴¹ Posey-Maddox, *When Middle-Class Parents*, 53.

⁴² James Ryan, “Means and Ends: Practical Considerations for Equitable School Reform,” in Levinson and Fay, *Dilemmas of Educational Ethics*, 172f. Jerry Weast, the school superintendent in question, discusses how he helped bring the affluent white parents to sign on to the district’s mission to help all the children in the district and shrink educational gaps, in

https://www.washingtonpost.com/lifestyle/magazine/exit-interview-moco-superintendent-jerry-d-weast-on-lessons-learned/2011/03/07/AFh6RxvC_story.html?utm_term=.6cb7deaef3fd

⁴³ See Robert H. Frank and Philip Cook, *The Winner-Take-All Society: Why the Few at the Top Get So Much More Than the Rest of Us* (Penguin, 1996). Jacob S. Hacker and Paul Pierson, *Winner-Take-All Politics: How Washington Made the Rich Richer--and Turned Its Back on the Middle Class* (New York, NY: Simon and

Schuster 2011). Anand Giridharadas, *Winners Take All: The Elite Charade of Changing the World* (New York, NY: Knopf 2018)

⁴⁴ One place that struggles for educational justice have taken on this “bigger picture” of social injustice are the teacher strikes of spring 2018 (in West Virginia, Oklahoma, and Arizona) and especially the Los Angeles and Oakland (CA) teacher strikes of January and February 2019. The latter joined teacher pay and working conditions not only to increased funding for schools (as the 2018 teacher actions had done) but also school-based services for low income students (such as more counselors and social workers) and reduced class sizes, and also a challenge to the “corporate takeover” of the LA school board and, thereby, the LA school system in recent years. (See Eric Blanc, *Red State Revolt: The Teachers' Strikes and Working-Class Politics* [New York, NY: Verso Books 2019], and “What the LA Teachers Won, and How They Won it,” *The Nation*, Jan. 24, 2019.)