Toward a Critical Race Theory of Education

GLORIA LADSON-BILLINGS AND
WILLIAM F. TATE IV
University of Wisconsin

This article asserts that despite the salience of race in U.S. society, as a topic of scholarly inquiry, it remains untheorized. The article argues for a critical race theoretical perspective in education analogous to that of critical race theory in legal scholarship by developing three propositions: (1) race continues to be significant in the United States; (2) U.S. society is based on property rights rather than human rights; and (3) the intersection of race and property creates an analytical tool for understanding inequity. The article concludes with a look at the limitations of the current multicultural paradigm.

> *The presentation of truth in new forms provokes resistance, confounding those committed to accepted measures for determining the quality and validity of statements made and conclusions reached, and making it difficult for them to respond and adjudge what is acceptable.*
>
> —Derrick Bell, *Faces at the Bottom of the Well*

> *I am not included within the pale of this glorious anniversary! Your high inde - pendence only reveals the immeasurable distance between us. The blessings in which you this day, rejoice, are not enjoyed in common. The rich inheritance of justice, liberty, prosperity and independence bequeathed by your fathers, not by me . . .*
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> —Frederick Douglass, *My Bondage and My Freedom*

In 1991 social activist and education critic Jonathan Kozol delineated the great inequities that exist between the schooling experiences of white middle-class students and those of poor African-American and Latino students. And, while Kozol's graphic descriptions may prompt some to question how it is possible that we allow these "savage inequalities," this article suggests that these inequalities are a logical and predictable result of a racialized society in which discussions of race and racism continue to be muted and marginalized.[1]

Teachers College Record Volume 97, Number 1, Fall 1995

0161–4681–95/9701/047$1.50/0

In this article we attempt to theorize race and use it as an analytic tool for understanding school inequity.[2] We begin with a set of propositions about race and property and their intersections. We situate our discussion in an explication of critical race theory and attempt to move beyond the boundaries of the educational research literature to include arguments and new perspectives from law and the social sciences. In doing so, we acknowledge and are indebted to a number of scholars whose work crosses disciplinary boundaries.[3] We conclude by exploring the tensions between our conceptualization of a critical race theory in education and the educational reform movement identified as multicultural education.

UNDERSTANDING RACE AND PROPERTY

Our discussion of social inequity in general, and school inequity in particular, is based on three central propositions:[4]

1. Race continues to be a significant factor in determining inequity in the United States.
2. U.S. society is based on property rights.
3. The intersection of race and property creates an analytic tool through which we can understand social (and, consequently, school) inequity.

In this section we expand on these propositions and provide supporting "meta-propositions" to make clear our line of reasoning and relevant application to educational or school settings.

RACE AS FACTOR IN INEQUITY

The first proposition—that race continues to be a significant factor in determining inequity in the United States—is easily documented in the statistical and demographic data. Hacker's look at educational and life chances such as high school dropout rates, suspension rates, and incarceration rates echoes earlier statistics of the Children's Defense Fund.[5] However, in what we now call the postmodern era, some scholars question the usefulness of race as a category.

Omi and Winant argue that popular notions of race as either an ideological construct or an objective condition have epistemological limitations.[6] Thinking of race strictly as an ideological construct denies the reality of a racialized society and its impact on "raced" people in their everyday lives. On the other hand, thinking of race solely as an objective condition denies the problematic aspects of race—how do we decide who fits into which

racial classifications? How do we categorize racial mixtures? Indeed, the world of biology has found the concept of race virtually useless. Geneticist Cavalli-Sforza asserts that "human populations are sometimes known as ethnic groups, or 'races.' . . . They are hard to define in a way that is both rigorous and useful because human beings group themselves in a bewildering array of sets, some of them overlapping, all of them in a state of flux."[7]

Nonetheless, even when the concept of race fails to "make sense," we continue to employ it. According to Nobel Laureate Toni Morrison:

> Race has become metaphorical—a way of referring to and disguising forces, events, classes, and expressions of social decay and economic division far more threatening to the body politic than biological "race" ever was.
>
> Expensively kept, economically unsound, a spurious and useless political asset in election campaigns, racism is as healthy today as it was during the Enlightenment. It seems that is has a utility far beyond economy, beyond the sequestering of classes from one another, and has assumed a metaphorical life so completely embedded in daily discourse that it is perhaps more necessary and more on display than ever before.[8]

Despite the problematic nature of race, we offer as a first meta-proposition that race, unlike gender and class, remains untheorized.[9] Over the past few decades theoretical and epistemological considerations of gender have proliferated.[10] Though the field continues to struggle for legitimacy in academe, interest in and publications about feminist theories abound. At the same time, Marxist and Neo-Marxist formulations about class continue to merit consideration as theoretical models for understanding social inequity.[11] We recognize the importance of both gender- and class-based analyses while at the same time pointing to their shortcomings vis-à-vis race. Roediger points out that "the main body of writing by White Marxists in the United States has both 'naturalized' whiteness and oversimplified race."[12]

Omi and Winant have done significant work in providing a sociological explanation of race in the United States. They argue that the paradigms of race have been conflated with notions of ethnicity, class, and nation because

> theories of race—of its meaning, its transformations, the significance of racial events—have never been a top priority in social science. In the U.S., although the "founding fathers" of American sociology . . . were explicitly concerned with the state of domestic race relations, racial theory remained one of the least developed fields of sociological inquiry.[13]

To mount a viable challenge to the dominant paradigm of ethnicity (i.e., we are all ethnic and, consequently, must assimilate and rise socially the same way European Americans have), Omi and Winant offer a racial formation theory that they define as "the sociohistorical process by which racial categories are created, inhabited, transformed and destroyed. . . . [It] is a process of historically situated *projects* in which human bodies and social structures are represented and organized." Further, they link "racial formation to the evolution of hegemony, the way in which society is organized and ruled." Their analysis suggests that "race is a matter of both social structure and cultural representation."[14]

By arguing that race remains untheorized, we are not suggesting that other scholars have not looked carefully at race as a powerful tool for explaining social inequity, but that the intellectual salience of this theorizing has not been systematically employed in the analysis of educational inequality. Thus, like Omi and Winant, we are attempting to uncover or decipher the social-structural and cultural significance of race in education. Our work owes an intellectual debt to both Carter G. Woodson and W. E. B. Du Bois, who, although marginalized by the mainstream academic community, used race as a theoretical lens for assessing social inequity.[15]

Both Woodson and Du Bois presented cogent arguments for considering race as *the* central construct for understanding inequality. In many ways our work is an attempt to build on the foundation laid by these scholars.[16] Briefly, Woodson, as far back as 1916, began to establish the legitimacy of race (and, in particular, African Americans) as a subject of scholarly inquiry.[17] As founder of the Association for the Study of Negro Life and History and editor of its *Journal of Negro History*, Woodson revolutionized the thinking about African Americans from that of pathology and inferiority to a multitextured analysis of the uniqueness of African Americans and their situation in the United States. His most notable publication, *The Miseducation of the Negro*, identified the school's role in structuring inequality and demotivating African-American students:

> The same educational process which inspires and stimulates the oppressor with the thought that he is everything and has accomplished everything worthwhile, depresses and crushes at the same time the spark of genius in the Negro by making him feel that his race does not amount to much and never will measure up to the standards of other peoples.[18]

Du Bois, perhaps better known among mainstream scholars, profoundly impacted the thinking of many identified as "other" by naming a "double consciousness" felt by African Americans. According to Du Bois, the African American "ever feels his two-ness—an American, A Negro; two

souls, two thoughts, two unreconciled strivings."[19] In a current biography of Du Bois, Lewis details the intellectual impact of this concept:

> It was a revolutionary concept. It was not just revolutionary; the concept of the divided self was profoundly mystical, for Du Bois invested this double consciousness with a capacity to see incomparably further and deeper. The African-American—seventh son after the Egyptian and Indian, the Greek and Roman, the Teuton and Mongolian—possessed the gift of "second sight in this American world," an intuitive faculty (prelogical, in a sense) enabling him/her to see and say things about American society that possessed a heightened moral validity. Because he dwelt equally in the mind and heart of his oppressor as in his own beset psyche, the African American embraced a vision of the commonweal at its best.[20]

As a prophetic foreshadowing of the centrality of race in U.S. society, Du Bois reminded us that "the problem of the twentieth century is the problem of the color line."[21]

The second meta-proposition that we use to support the proposition that race continues to be significant in explaining inequity in the United States is that class- and gender-based explanations are not powerful enough to explain all of the difference (or variance) in school experience and performance. Although both class and gender can and do intersect race, as stand-alone variables they do not explain all of the educational achievement differences apparent between whites and students of color. Indeed, there is some evidence to suggest that even when we hold constant for class, middle-class African-American students do not achieve at the same level as their white counterparts.[22] Although Oakes reports that "in academic tracking, . . . poor and minority students are most likely to be placed at the lowest levels of the school's sorting system,"[23] we are less clear as to which factor—race or class—is causal. Perhaps the larger question of the impact of race on social class is the more relevant one. Space limitations do not permit us to examine that question.

Issues of gender bias also figure in inequitable schooling.[24] Females receive less attention from teachers, are counseled away from or out of advanced mathematics and science courses, and although they receive better grades than their male counterparts, their grades do not translate into advantages in college admission and/or the work place.[25]

But examination of class and gender, taken alone or together, do not account for the extraordinarily high rates of school dropout, suspension, explusion, and failure among African-American and Latino males.[26] In the case of suspension, Majors and Billson argue that many African-American males are suspended or expelled from school for what they

termed "non-contact violations"—wearing banned items of clothing such as hats and jackets, or wearing these items in an "unauthorized" manner, such as backwards or inside out.[27]

The point we strive to make with this meta-proposition is not that class and gender are insignificant, but rather, as West suggests, that "race matters," and, as Smith insists, "blackness matters in more detailed ways."[28]

THE PROPERTY ISSUE

Our second proposition, that U.S. society is based on property rights, is best explicated by examining legal scholarship and interpretations of rights. To develop this proposition it is important to situate it in the context of critical race theory. Monaghan reports that "critical race legal scholarship developed in the 1970s, in part because minority scholars thought they were being overlooked in critical legal studies, a better-known movement that examines the way law encodes cultural norms."[29] However, Delgado argues that despite the diversity contained within the critical race movement, there are some shared features:

> an assumption that racism is not a series of isolated acts, but is endemic in American life, deeply ingrained legally, culturally, and even psychologically;
>
> a call for a reinterpretation of civil-rights law "in light of its ineffectuality, showing that laws to remedy racial injustices are often undermined before they can fulfill their promise";
>
> a challenge to the "traditional claims of legal neutrality, objectivity, color-blindness, and meritocracy as camouflages for the self-interest of dominant groups in American society";
>
> an insistence on subjectivity and the reformulation of legal doctrine to reflect the perspectives of those who have experienced and been victimized by racism firsthand;
>
> the use of stories or first-person accounts.[30]

In our analysis we add another aspect to this critical paradigm that disentangles democracy and capitalism. Many discussions of democracy conflate it with capitalism despite the fact that it is possible to have a democratic government with an economic system other than capitalism. Discussing the two ideologies as if they were one masks the pernicious effects of capitalism on those who are relegated to its lowest ranks. Traditional civil rights approaches to solving inequality have depended on the "rightness" of democracy while ignoring the structural inequality of capitalism.[31] However, democracy in the U.S. context was built on capitalism.

In the early years of the republic *only* capitalists enjoyed the franchise. Two hundred years later when civil rights leaders of the 1950s and 1960s built their pleas for social justice on an appeal to the civil and human rights, they were ignoring the fact that the society was based on *property rights*.[32] An example from the 1600s undescores the centrality of property in the Americas from the beginning of European settlement:

> When the Pilgrims came to New England they too were coming not to vacant land but to territory inhabited by tribes of Indians. The governor of the Massachusetts Bay Colony, John Winthrop, created the excuse to take Indian land by declaring the area legally a "vacuum." The Indians, he said, had not "subdued" the land, and therefore had only a "natural" right to it, but not a "civil right." A "natural right" did not have legal standing.[33]

Bell examined the events leading up to the Constitution's development and concluded that there exists a tension between property rights and human rights.[34] This tension was greatly exacerbated by the presence of African peoples as slaves in America. The purpose of the government was to protect the main object of society—property. The slave status of most African Americans (as well as women and children) resulted in their being objectified as property. And, a government constructed to protect the rights of property owners lacked the incentive to secure human rights for the African American.[35]

According to Bell "the concept of individual rights, unconnected to property rights, was totally foreign to these men of property; and thus, despite two decades of civil rights gains, most Blacks remain disadvantaged and deprived because of their race."[36]

The grand narrative of U.S. history is replete with tensions and struggles over property—in its various forms. From the removal of Indians (and later Japanese Americans) from the land, to military conquest of the Mexicans,[37] to the construction of Africans as property,[38] the ability to define, possess, and own property has been a central feature of power in America. We do not suggest that other nations have not fought over and defined themselves by property and landownership.[39] However, the contradiction of a reified symbolic individual juxtaposed tdo the reality of "real estate" means that emphasis on the centrality of property can be disguised. Thus, we talk about the importance of the individual, individual rights, and civil rights while social benefits accrue largely to property owners.[40]

Property relates to education in explicit and implicit ways. Recurring discussions about property tax relief indicate that more affluent communities (which have higher property values, hence higher tax assessments) resent paying for a public school system whose clientele is largely nonwhite and poor.[41] In the simplest of equations, those with "better" prop-

erty are entitled to "better" schools. Kozol illustrates the disparities: "Average expenditures per pupil in the city of New York in 1987 were some $5,500. In the highest spending suburbs of New York (Great Neck or Manhasset, for example, on Long Island) funding levels rose above $11,000, with the highest districts in the state at $15,000."[42]

But the property differences manifest themselves in other ways. For example, curriculum represents a form of "intellectual property."[43] The quality and quantity of the curriculum varies with the "property values" of the school. The use of a critical race story[44] appropriately represents this notion:

> The teenage son of one of the authors of this article was preparing to attend high school. A friend had a youngster of similar age who also was preparing to enter high school. The boys excitedly poured over course offerings in their respective schools' catalogues. One boy was planning on attending school in an upper-middle-class white community. The other would be attending school in an urban, largely African-American district. The difference between the course offerings as specified in the catalogues was striking. The boy attending the white, middle-class school had his choice of many foreign languages—Spanish, French, German, Latin, Greek, Italian, Chinese, and Japanese. His mathematics offerings included algebra, geometry, trigonometry, calculus, statistics, general math, and business math. The science department at this school offered biology, chemistry, physics, geology, science in society, biochemistry, and general science. The other boy's curriculum choices were not nearly as broad. His foreign language choices were Spanish and French. His mathematics choices were general math, business math, and algebra (there were no geometry or trig classes offered). His science choices were general science, life science, biology, and physical science. The differences in electives were even more pronounced, with the affluent school offering courses such as Film as Literature, Asian Studies, computer programming, and journalism. Very few elective courses were offered at the African-American school, which had no band, orchestra, or school newspaper.

The availability of "rich" (or enriched) intellectual property delimits what is now called "opportunity to learn"[45]—the presumption that along with providing educational "standards"[46] that detail what students should know and be able to do, they must have the material resources that support their learning. Thus, intellectual property must be undergirded by "real" property, that is, science labs, computers and other state-of-the-art technologies, appropriately certified and prepared teachers. Of course,

Kozol demonstrated that schools that serve poor students of color are unlikely to have access to these resources and, consequently, students will have little or no opportunity to learn despite the attempt to mandate educational standards.[47]

CRITICAL RACE THEORY AND EDUCATION

With this notion of property rights as a defining feature of the society, we proceed to describe the ways that the features of critical race theory mentioned in the previous section can be applied to our understanding of educational inequity.

Racism as Endemic and Deeply Ingrained in American Life

If racism were merely isolated, unrelated, individual acts, we would expect to see at least a few examples of educational excellence and equity together in the nation's public schools. Instead, those places where African Americans do experience educational success tend to be outside of the public schools.[48] While some might argue that poor children, regardless of race, do worse in school, and that the high proportion of African-American poor contributes to their dismal school performance, we argue that the cause of their poverty in conjunction with the condition of their schools and schooling is institutional and structural racism. Thus, when we speak of racism we refer to Wellman's definition of "culturally sanctioned beliefs which, regardless of the intentions involved, defend the advantages Whites have because of the subordinated positions of racial minorities." We must therefore contend with the "problem facing White people [of coming] to grips with the demands made by Blacks and Whites while at the same time *avoiding* the possibility of institutional change and reorganization that might affect them."[49]

A Reinterpretation of Ineffective Civil Rights Law

In the case of education, the civil rights decision that best exemplifies our position is the landmark *Brown* v. *Board of Education of Topeka, Kansas*. While having the utmost respect for the work of Thurgood Marshall and the National Association for the Advancement of Colored People (NAACP) legal defense team in arguing the *Brown* decision, with forty years of hindsight we recognize some serious shortcomings in that strategy. Today, students of color are more segregated than ever before.[50] Although African Americans represent 12 percent of the national population, they are the majority in twenty-one of the twenty-two largest (urban) school districts.[51] Instead of providing more and better educational opportunities,

school desegregation has meant increased white flight along with a loss of African-American teaching and administrative positions.[52] In explaining the double-edge sword of civil rights legislation, Crenshaw argued that

> the civil rights community . . . must come to terms with the fact that antidiscrimination discourse is fundamentally ambiguous and can accommodate conservative as well as liberal views of race and equality. This dilemma suggests that the civil rights constituency cannot afford to view antidiscrimination doctrine as a permanent pronouncement of society's commitment to ending racial subordination. Rather, antidiscrimination law represents an ongoing ideological struggle in which occasional winners harness the moral, coercive, consensual power of law. Nonetheless, the victories it offers can be ephemeral and the risks of engagement substantial.[53]

An example of Crenshaw's point about the ambiguity of civil rights legislation was demonstrated in a high school district in Northern California.[54] Of the five high schools in the district, one was located in a predominantly African-American community. To entice white students to attend that school, the district funded a number of inducements including free camping and skiing trips. While the trips were available to all of the students, they were attended largely by the white students, who already owned the expensive camping and skiing equipment. However, these inducements were not enough to continuously attract white students. As enrollment began to fall, the district decided to close a school. Not surprisingly, the school in the African-American community was closed and all of its students had to be (and continue to be) bused to the four white schools in the district.

Lomotey and Staley's examination of Buffalo's "model" desegregation program revealed that African-American and Latino students continued to be poorly served by the school system. The academic achievement of African-American and Latino students failed to improve while their suspension, expulsion, and dropout rates continued to rise. On the other hand, the desegregation plan provided special magnet programs and extended day care of which whites were able to take advantage. What, then, made Buffalo a model school desegregation program? In short, the benefits that whites derived from school desegregation and their seeming support of the district's desegregation program.[55] Thus, a model desegregation program becomes defined as one that ensures that whites are happy (and do not leave the system altogether) regardless of whether African-American and other students of color achieve or remain.

Challenging Claims of Neutrality, Objectivity, Color-blindness, and Meritocracy

A theme of "naming one's own reality" or "voice" is entrenched in the

work of critical race theorists. Many critical race theorists argue that the form and substance of scholarship are closely connected.[56] These scholars use parables, chronicles, stories, counterstories, poetry, fiction, and revisionist histories to illustrate the false necessity and irony of much of current civil rights doctrine. Delgado suggests that there are at least three reasons for naming one's own reality in legal discourse:

1. Much of reality is socially constructed.
2. Stories provide members of outgroups a vehicle for psychic self-preservation.
3. The exchange of stories from teller to listener can help overcome ethnocentrism and the dysconscious conviction of viewing the world in one way.[57]

The first reason for naming one's own reality is to demonstrate how political and moral analysis is conducted in legal scholarship. Many mainstream legal scholars embrace universalism over particularity.[58] According to Williams, "theoretical legal understanding" is characterized, in Anglo-American jurisprudence, by the acceptance of transcendent, acontextual, universal legal truths or procedures.[59] For instance, some legal scholars might contend that the tort of fraud has always existed and that it is a component belonging to the universal system of right and wrong. This view tends to discount anything that is nontranscendent (historical), or contextual (socially constructed), or nonuniversal (specific) with the unscholarly labels of "emotional," "literary," "personal," or "false."

In contrast, critical race theorists argue that political and moral analysis is situational—"truths only exist for this person in this predicament at this time in history."[60] For the critical race theorist, social reality is constructed by the formulation and the exchange of stories about individual situations.[61] These stories serve as interpretive structures by which we impose order on experience and it on us.[62]

A second reason for the naming-one's-own-reality theme of critical race theory is the psychic preservation of marginalized groups. A factor contributing to the demoralization of marginalized groups is self-condemnation.[63] Members of minority groups internalize the stereotypic images that certain elements of society have constructed in order to maintain their power.[64] Historically, storytelling has been a kind of medicine to heal the wounds of pain caused by racial oppression.[65] The story of one's condition leads to the realization of how one came to be oppressed and subjugated and allows one to stop inflicting mental violence on oneself.

Finally, naming one's own reality with stories can affect the oppressor. Most oppression does not seem like oppression to the perpetrator.[66] Delgado argues that the dominant group justifies its power with stories—stock

explanations—that construct reality in ways to maintain their privilege.[67] Thus, oppression is rationalized, causing little self-examination by the oppressor. Stories by people of color can catalyze the necessary cognitive conflict to jar dysconscious racism.

The "voice" component of critical race theory provides a way to communicate the experience and realities of the oppressed, a first step on the road to justice. As we attempt to make linkages between critical race theory and education, we contend that the voice of people of color is required for a complete analysis of the educational system. Delpit argues that one of the tragedies of education is the way in which the dialogue of people of color has been silenced. An example from her conversation with an African-American graduate student illustrates this point:

> There comes a moment in every class when we have to discuss "The Black Issue" and what's appropriate education for Black children. I tell you, I'm tired of arguing with those White people, because they won't listen. Well, I don't know if they really don't listen or if they just don't believe you. It seems like if you can't quote Vygotsky or something, then you don't have any validity to speak about your own kids. Anyway, I'm not bothering with it anymore, now I'm just in it for a grade.[68]

A growing number of education scholars of color are raising critical questions about the way that research is being conducted in communities of color.[69] Thus, without authentic voices of people of color (as teachers, parents, administrators, students, and community members) it is doubtful that we can say or know anything useful about education in their communities.

THE INTERSECTION OF RACE AND PROPERTY

In the previous sections of this article we argued that race is still a significant factor in determining inequity in the United States and that the society is based on property rights rather than on human rights. In this section we discuss the intersection of race and property as a central construct in understanding a critical race theoretical approach to education.

Harris argues that "slavery linked the privilege of Whites to the subordination of Blacks through a legal regime that attempted the conversion of Blacks into objects of property. Similarly, the settlement and seizure of Native American land supported White privilege through a system of property rights in land in which the 'race' of the Native Americans rendered their first possession right invisible and justified conquest." But, more pernicious and long lasting then the victimization of people of color is the construction of whiteness as the ultimate property. "Possession—the act necessary to lay the basis for rights in property—was defined to include only the cultural practices of Whites. This definition laid the foundation

for the idea that whiteness—that which Whites alone possess—is valuable and is property."[70]

Because of space constraints, it is not possible to fully explicate Harris's thorough analysis of whiteness as property. However, it is important to delineate what she terms the "property functions of whiteness," which include: (1) rights of disposition; (2) rights to use and enjoyment; (3) reputation and status property; and (4) the absolute right to exclude. How these rights apply to education is germane to our discussion.

Rights of disposition. Because property rights are described as fully alienable, that is, transferable, it is difficult to see how whiteness can be construed as property.[71] However, alienability of certain property is limited (e.g., entitlements, government licenses, professional degrees or licenses held by one party and financed by the labor of the other in the context of divorce). Thus, whiteness when conferred on certain student performances is alienable.[72] When students are rewarded only for conformity to perceived "white norms" or sanctioned for cultural practices (e.g., dress, speech patterns, unauthorized conceptions of knowledge), white property is being rendered alienable.

Rights to use and enjoyment. Legally, whites can use and enjoy the privileges of whiteness. As McIntosh has explicitly demonstrated, whiteness allows for specific social, cultural, and economic privileges.[73] Fuller further asserts that whiteness is both performative and pleasurable.[74] In the school setting, whiteness allows for extensive use of school property. Kozol's description of the material differences in two New York City schools can be interpreted as the difference between those who possess the right to use and enjoy what schools can offer and those who do not:

> The [white] school serves 825 children in the kindergarten through sixth grade. This is approximately half the student population crowded into [black] P.S. 79, where 1,550 children fill a space intended for 1,000, and a great deal smaller than the 1,300 children packed into the former skating rink.[75]

This right of use and enjoyment is also reflected in the structure of the curriculum, also described by Kozol:

> The curriculum [the white school] follows "emphasizes critical thinking, reasoning and logic." The planetarium, for instance, is employed not simply for the study of the universe as it exists. "Children also are designing their own galaxies," the teacher says. . . .
>
> In my [Kozol's] notes: "Six girls, four boys. Nine White, one Chinese. I am glad they have this class. But what about the others? Aren't there ten Black children in the school who could *enjoy* this also?"[76]

Reputation and status property. The concept of reputation as property is regularly demonstrated in legal cases of libel and slander. Thus, to damage someone's reputation is to damage some aspect of his or her personal property. In the case of race, to call a white person "black" is to defame him or her.[77] In the case of schooling, to identify a school or program as nonwhite in any way is to diminish its reputation or status. For example, despite the prestige of foreign language learning, bilingual education as practiced in the United States as a nonwhite form of second language learning has lower status.[78] The term *urban*, the root word of *urbane*, has come to mean black. Thus, urban schools (located in the urbane, sophisticated cities) lack the status and reputation of suburban (white) schools and when urban students move to or are bused to suburban schools, these schools lose their reputation.[79]

The absolute right to exclude. Whiteness is constructed in this society as the absence of the "contaminating" influence of blackness. Thus, "one drop of black blood" constructs one as black, regardless of phenotypic markers.[80] In schooling, the absolute right to exclude was demonstrated initially by denying blacks access to schooling altogether. Later, it was demonstrated by the creation and maintenance of separate schools. More recently it has been demonstrated by white flight and the growing insistence on vouchers, public funding of private schools, and schools of choice.[81] Within schools, absolute right to exclude is demonstrated by resegregation via tracking,[82] the institution of "gifted" programs, honors programs, and advanced placement classes. So complete is this exclusion that black students often come to the university in the role of intruders—who have been granted special permission to be there.

In this section we have attempted to draw parallels between the critical race legal theory notion of whiteness as property and educational inequity. In the final section we relate some of the intellectual/theoretical tensions that exist between critical race theory and multicultural education.

THE LIMITS OF THE MULTICULTURAL PARADIGM

Throughout this article we have argued the need for a critical race theoretical perspective to cast a new gaze on the persistent problems of racism in schooling. We have argued the need for this perspective because of the failure of scholars to theorize race. We have drawn parallels between the way critical race legal scholars understand their position vis-à-vis traditional legal scholarship and the ways critical race theory applied to education offers a way to rethink traditional educational scholarship. We also have referred to the tensions that exist between traditional civil rights legislation and critical race legal theory. In this section we identify a necessary tension

between critical race theory in education and what we term the multicultural paradigm.

Multicultural education has been conceptualized as a reform movement designed to effect change in the "school and other educational institutions so that students from diverse racial, ethnic, and other social-class groups will experience educational equality."[83] In more recent years, multicultural education has expanded to include issues of gender, ability, and sexual orientation. Although one could argue for an early history of the "multicultural education movement" as far back as the 1880s when George Washington Williams wrote his history of African Americans, much of the current multicultural education practice seems more appropriately rooted in the intergroup education movement of the 1950s, which was designed to help African Americans and other "unmeltable" ethnics become a part of America's melting pot.[84] Their goals were primarily assimilationist through the reduction of prejudice. However, after the civil rights unrest and growing self-awareness of African Americans in the 1960s, the desire to assimilate was supplanted by the reclamation of an "authentic black personality" that did not rely on the acceptance by or standards of white America. This new vision was evidenced in the academy in the form of first, black studies and later, when other groups made similar liberating moves, ethnic studies.[85]

Current practical demonstrations of multicultural education in schools often reduce it to trivial examples and artifacts of cultures such as eating ethnic or cultural foods, singing songs or dancing, reading folktales, and other less than scholarly pursuits of the fundamentally different conceptions of knowledge or quests for social justice.[86] At the university level, much of the concern over multicultural education has been over curriculum inclusion.[87] However, another level of debate emerged over what became known as "multiculturalism."

Somewhat different from multicultural education in that it does not represent a particular educational reform or scholarly tradition, multiculturalism came to be viewed as a political philosophy of "many cultures" existing together in an atmosphere of respect and tolerance.[88] Thus, outside of the classroom multiculturalism represented the attempt to bring both students and faculty from a variety of cultures into the school (or academy) environment. Today, the term is used interchangeably with the ever-expanding "diversity," a term used to explain all types of "difference"—racial, ethnic, cultural, linguistic, ability, gender, sexual orientation. Thus, popular music, clothes, media, books, and so forth, reflect a growing awareness of diversity and/or multiculturalism. Less often discussed are the growing tensions that exist between and among various groups that gather under the umbrella of multiculturalism—that is, the interests of groups can be competing or their

perspectives can be at odds.[89] We assert that the ever-expanding multicultural paradigm follows the traditions of liberalism—allowing a proliferation of difference. Unfortunately, the tensions between and among these differences is rarely interrogated, presuming a "unity of difference"—that is, that all difference is both analogous and equivalent.[90]

To make parallel the analogy between critical race legal theory and traditional civil rights law with that of critical race theory in education and multicultural education we need to restate the point that critical race legal theorists have "doubts about the foundation of moderate/incremental civil rights law."[91] The foundation of civil rights law has been in human rights rather than in property rights. Thus, without disrespect to the pioneers of civil rights law, critical race legal scholars document the ways in which civil rights law is regularly subverted to benefit whites.[92]

We argue that the current multicultural paradigm functions in a manner similar to civil rights law. Instead of creating radically new paradigms that ensure justice, multicultural reforms are routinely "sucked back into the system" and just as traditional civil rights law is based on a foundation of human rights, the current multicultural paradigm is mired in liberal ideology that offers no radical change in the current order.[93] Thus, critical race theory in education, like its antecedent in legal scholarship, is a radical critique of both the status quo and the purported reforms.

We make this observation of the limits of the current multicultural paradigm not to disparage the scholarly efforts and sacrifices of many of its proponents, but to underscore the difficulty (indeed, impossibility) of maintaining the spirit and intent of justice for the oppressed while simultaneously permitting the hegemonic rule of the oppressor.[94] Thus, as critical race theory scholars we unabashedly reject a paradigm that attempts to be everything to everyone and consequently becomes nothing for anyone, allowing the status quo to prevail. Instead, we align our scholarship and activism with the philosophy of Marcus Garvey, who believed that the black man was universally oppressed on racial grounds, and that any program of emancipation would have to be built around the question of race first.[95] In his own words, Garvey speaks to us clearly and unequivocally:

> In a world of wolves one should go armed, and one of the most powerful defensive weapons within the reach of Negroes is the practice of race first in all parts of the world.[96]

Notes

1 Jonathan Kozol, *Savage Inequalities* (New York: Crown Publishers, 1991). For further discussion of our inability to articulate issues of race and racism see Toni Morrison, *Playing in the Dark: Whiteness and the Literary Imagination* (Cambridge: Harvard University Press, 1992); Cornel West, "Learning to Talk of Race," *New York Times Magazine*, August 2, 1992, pp. 24, 26; and Beverly Daniel Tatum, "Talking about Race, Learning about Racism: The

Application of Racial Identity Development Theory in the Classroom," *Harvard Educational Review* 62 (1992): 1–24.

2 Throughout this article the term *race* is used to define the polar opposites of "conceptual whiteness" and "conceptual blackness" (Joyce King, "Perceiving Reality in a New Way: Rethinking the Black/white Duality of our Time [Paper presented at the annual meeting of the American Educational Research Association, New Orleans, April 1994]). We do not mean to reserve the sense of "otherness" for African Americans; rather, our discussion attempts to illuminate how discussions of race in the United States positions *everyone* as either "white" or "nonwhite." Thus, despite the use of African-American legal and educational exemplars, we include other groups who have been constructed at various time in their history as nonwhite or black. Readers should note that some of the leading legal scholars in the critical race legal theory movement are of Latino and Asian-American as well as African-American heritage.

3 See, for example, Patricia Hill Collins, *Black Feminist Thought* (New York: Routledge, 1991); Joyce King and Carolyn Mitchell, *Black Mothers to Sons: Juxtaposing African American Literature and Social Practice* (New York: Peter Lang, 1990); and Patricia Williams, *The Alchemy of Race and Rights: Diary of a Law Professor* (Cambridge: Harvard University Press, 1991).

4 These propositions are not hierarchical. Rather, they can be envisioned as sides of an equilateral triangle, each equal and each central to the construction of the overall theory.

5 Andrew Hacker, *Two Nations: Black and White, Separate, Hostile, Unequal* (New York: Ballantine Books, 1992); and Marian Wright Edelman, *Families in Peril: An Agenda for Social Change* (Cambridge: Harvard University Press, 1987).

6 Michael Omi and Howard Winant, "On the Theoretical Concept of Race," in *Race, Identity and Representation in Education,* ed. C. McCarthy and W. Crichlow (New York: Routledge, 1993), pp. 3–10.

7 Luigi Luca Cavalli-Sforza, "Genes, People and Languages," *Scientific American*, November 1991, p. 104.

8 Morrison, *Playing in the Dark*, p. 63.

9 This assertion was made forcefully by the participants of the Institute NHI (No Humans Involved) at a symposium entitled "The Two Reservations: Western Thought, the Color Line, and the Crisis of the Negro Intellectual Revisited," sponsored by the Department of African and Afro-American Studies at Stanford University, Stanford, Calif., March 3–5, 1994.

10 See, for example, Nancy Chodorow, *The Reproduction of Mothering* (Berkeley: University of California Press, 1978); Simone DeBeauvoir, *The Second Sex* (New York: Bantam Books, 1961); Vivian Gornick, "Women as Outsiders," in *Women in Sexist Society*, ed. V. Gornick and B. Moran (New York: Basic Books, 1971), pp. 70–84; Nancy Hartsock, "Feminist Theory and the Development of Revolutionary Strategy," *Capitalist Patriarch and the Case for Socialist Feminism*, ed. Z. Eisenstein (London and New York: Monthly Review Press, 1979); and Alison Jagger, *Feminist Theory and Human Nature* (Sussex, England: Harvester Press, 1983).

11 See, for example, Samuel Bowles and Herbert Gintis, *Schooling in Capitalist America* (New York: Basic Books, 1976); Martin Carnoy, *Education and Cultural Imperialism* (New York: McKay, 1974); Michael W. Apple, "Redefining Inequality: Authoritarian Populism and the Conservative Restoration," *Teachers College Record* 90 (1988): 167–84; and Philip Wexler, *Social Analysis and Education: After the New Sociology* (New York: Routledge & Kegan Paul, 1987).

12 David Roediger, *The Wages of Whiteness* (London: Verso, 1991), p. 6.

13 Michael Omi and Howard Winant, *Racial Formation in the United States from the 1960s to the 1990s*, 2nd ed. (New York: Routledge, 1994), p. 9.

14 Ibid., p. 56.

15 Carter G. Woodson, *The Miseducation of the Negro* (Washington, D.C.: Association Press, 1933); and W. E. B. Du Bois, *The Souls of Black Folks* (New York: Penguin Books, 1989; first published in 1903).

16 Our decision to focus on Woodson and Du Bois is not intended to diminish the import of the scores of African-American scholars who also emerged during their time such as George E. Haynes, Charles S. Johnson, E. Franklin Frazier, Abram Harris, Sadie T. Alexander, Robert C. Weaver, Rayford Logan, Allison Davis, Dorothy Porter, and Benjamin Quarles. We highlight Woodson and Du Bois as early seminal thinkers about issues of race and racism.

17 See John Hope Franklin, *From Slavery to Freedom*, 6th ed. (New York: Alfred A. Knopf, 1988).

18 Woodson, *The Miseducation of the Negro*, p. xiii.

19 Du Bois, *The Souls of Black Folks*, p. 5. Other people of color, feminists, and gay and lesbian theorists all have appropriated Du Bois's notion of double consciousness to explain their estrangement from mainstream patriarchal, masculinist U.S. culture.

20 David Levering Lewis, *W. E. B. Du Bois: Biography of a Race, 1868–1919* (New York: Henry Holt, 1993), p. 281.

21 Du Bois, *The Souls of Black Folks*, p. 1.

22 See, for example, Lorene Cary, *Black Ice* (New York: Alfred A. Knopf, 1991); and Jeannie Oakes, *Keeping Track: How Schools Structure Inequality* (New Haven: Yale University Press, 1985).

23 Oakes, *Keeping Track*, p. 67.

24 American Association of University Women, *How Schools Shortchange Girls: A Study of Major Findings on Gender and Education* (Washington, D.C.: Author and National Education Association, 1992).

25 Myra Sadker, David Sadker, and Susan Klein, The Issue of Gender in Elementary and Secondary Education," in *Review of Educational Research in Education, vol. 19*, ed. G. Cerant (Washington, D.C.: American Educational Research Association, 1991), pp. 269–334.

26 Hacker, *Two Nations*, puts the dropout rate for African-American males in some large cities at close to 50 percent.

27 Robert Majors and Janet Billson, *Cool Pose: The Dilemmas of Black Manhood in America* (New York: Lexington Books, 1992).

28 Cornel West, *Race Matters* (Boston: Beacon Press, 1993); and David Lionel Smith, "Let Our People Go," *Black Scholar* 23 (1993): 75–76.

29 Peter Monaghan, " 'Critical Race Theory' Questions the Role of Legal Doctrine in Racial Inequity," *Chronicle of Higher Education*, June 23, 1993, pp. A7, A9.

30 Delgado, cited in Monaghan, "Critical Race Theory." Quotations are from p. A7. For a more detailed explication of the first item in the list, see Bell, *Faces at the Bottom of the Well*.

31 Manning Marable, *How Capitalism Underdeveloped Black America* (Boston: South End Press, 1983).

32 Derrick Bell, *And We Are Not Saved: The Elusive Quest for Racial Justice* (New York: Basic Books, 1987).

33 Howard Zinn, *A Peoples History of the United States* (New York: Harper & Row, 1980), p. 13.

34 Bell, *And We Are Not Saved*.

35 William Tate, Gloria Ladson-Billings, and Carl Grant, "The *Brown* Decision Revisited: Mathematizing Social Problems," *Educational Policy* 7 (1993): 255–75.

36 Bell, *And We Are Not Saved*, p. 239.

37 Ronald Takaki, *A Different Mirror: A History of Multicultural America* (Boston: Little Brown, 1993).

38 Franklin, *From Slavery to Freedom*.

39 Clearly, an analysis of worldwide tensions reinforces the importance of land to a people—Israel and the Palestinians, Iraq and Kuwait, the former Soviet bloc, Hitler and the Third Reich, all represent some of the struggles over land.

40 Even at a time when there is increased public sentiment for reducing the federal deficit, the one source of tax relief that no president or member of Congress would ever consider is that of denying home (property) owners their tax benefits.

41 See, for example, Howard Wainer, "Does Spending Money on Education Help?" *Educational Researcher* 22 (1993): 22–24; or Paul Houston, "School Vouchers: The Latest California Joke," *Phi Delta Kappan* 75 (1993): 61–66.

42 Kozol, *Savage Inequalities*, pp. 83–84.

43 This notion of "intellectual property" came into popular use when television talk show host David Letterman moved from NBC to CBS. NBC claimed that certain routines and jokes used by Letterman were the intellectual property of the network and, as such, could not be used by Letterman without permission.

44 Richard Delgado, "When a Story Is Just a Story: Does Voice Really Matter?" *Virginia Law Review* 76 (1990): 95–111.

45 See, for example, Floraline Stevens, *Opportunity to Learn: Issues of Equity for Poor and Minority Students* (Washington, D.C.: National Center for Education Statistics, 1993); idem, "Applying an Opportunity-to-learn Conceptual Framework to the Investigation of the Effects of Teaching Practices via Secondary Analyses of Multiple-case-study Summary Data," *The Journal of Negro Education* 62 (1993): 232–48; and Linda Winfield and Michael D. Woodard, "Assessment, Equity, Diversity in Reforming America's Schools," *Educational Policy* 8 (1994): 3–27.

46 The standards debate is too long and detailed to be discussed here. For a more detailed discussion of standards see, for example, Michael W. Apple, "Do the Standards Go Far Enough? Power, Policy, and Practices in Mathematics Education," *Journal for Research in Mathematics Education* 23 (1992): 412–31; and National Council of Education Standards and Testing, *Raising Standards for American Education: A Report to Congress, the Secretary of Education, the National Goals Panel, and the American People* (Washington, D.C.: Government Printing Office, 1992).

47 Kozol, *Savage Inequalities*.

48 Some urban Catholic schools, black independent schools, and historically black colleges and universities have demonstrated the educability of African-American students. As of this writing we have no data on the success of urban districts such as Detroit or Milwaukee that are attempting what is termed "African Centered" or Africentric education. See also Mwalimu J. Shujaa, Ed., *Too Much Schooling, Too Little Education: A Paradox of Black Life in White Societies* (Trenton, N.J.: Africa World Press, 1994).

49 David Wellman, *Portraits of White Racism* (Cambridge, England: Cambridge University Press, 1977). Quotations are from pp. xviii and 42.

50 See, for example, Gary Orfield, "School Desegregation in the 1980s," *Equity and Choice*, February 1988, p. 25; Derrick Bell, "Learning from Our Losses: Is School Desegregation Still Feasible in the 1980s? *Phi Delta Kappan* 64 (April 1983): 575; Willis D. Hawley, "Why It Is Hard to Believe in Desegregation," *Equity and Choice*, February 1988, pp. 9–15; and Janet Ward Schofield, *Black and White in School: Trust, Tension, or Tolerance?* (New York: Teachers College Press, 1989).

51 James Banks, "Teaching Multicultural Literacy to Teachers," *Teaching Education* 4 (1991): 135–44.

52 See Karl Taeuber, "Desegregation of Public School Districts: Persistence and Change," *Phi Delta Kappan* 72 (1990): 18–24; and H. L. Bisinger, "When Whites Flee," *New York Times Magazine*, May 29, 1994, pp. 26–33, 43, 50, 53–54, 56. On loss of professional

positions, see Sabrina King, "The Limited Presence of African American Teachers," *Review of Educational Research* 63 (1993): 115–49; and Jacqueline Irvine, "An Analysis of the Problem of Disappearing Black Educators," *Elementary School Journal* 88 (1988): 503–13.

53 Kimberle Williams Crenshaw, "Race Reform, and Retrenchment: Transformation and Legitimation in Antidiscrimination Law," *Harvard Law Review* 101 (1988): 1331–87.

54 Ibid., p. 1335.

55 Kofi Lomotey and John Statley, "The Education of African Americans in Buffalo Public Schools" (Paper presented at the annual meeting of the American Educational Research Association, Boston, 1990).

56 Richard Delgado, "Storytelling for Oppositionists and Others: A Plea for Narrative," *Michigan Law Review* 87 (1989): 2411–41.

57 See Richard Delgado et al., "Symposium: Legal Storytelling," *Michigan Law Review* 87 (1989): 2073. On dysconsciousness, see Joyce E. King, "Dysconscious Racism: Ideology, Identity and the Miseducation of Teachers," *Journal of Negro Education* 60 (1991): 135. King defines dysconsciousness as "an uncritical habit of mind (including perceptions, attitudes, assumptions, and beliefs) that justifies inequity and exploitation by accepting the existing order of things as given. . . . Dysconscious racism is a form of racism that tacitly accepts dominant White norms and privileges. It is not the *absence* of consciousness (that is, not unconsciousness) but an *impaired* consciousness or distorted way of thinking about race as compared to, for example, critical consciousness."

58 These notions of universalism prevail in much of social science research, including educational research.

59 Williams, *Alchemy of Race and Rights*.

60 Richard Delgado, "Brewer's Plea: Critical Thoughts on Common Cause," *Vanderbilt Law Review* 44 (1991): 11.

61 For example, see Williams, *Alchemy of Race and Rights*; Bell, *Faces at the Bottom of the Well*; and Mari Matsuda, "Public Response to Racist Speech: Considering the Victim's Story," *Michigan Law Review* 87 (1989): 2320–81.

62 Delgado, "Storytelling."

63 Ibid.

64 For example, see Crenshaw, "Race, Reform, and Retrenchment."

65 Delgado, "Storytelling."

66 Charles Lawrence, "The Id, the Ego, and Equal Protection: Reckoning with Unconscious Racism," *Stanford Law Review* 39 (1987): 317–88.

67 Delgado et al., "Symposium."

68 Lisa Delpit, "The Silenced Dialogue: Power and Pedagogy in Educating Other People's Children," *Harvard Educational Review* 58 (1988): 280.

69 At the 1994 annual meeting of the American Educational Research Association in New Orleans, two sessions entitled "Private Lives, Public Voices: Ethics of Research in Communities of Color" were convened to discuss the continued exploitation of people of color. According to one scholar of color, our communities have become "data plantations."

70 Cheryl I. Harris, "Whiteness as Property," *Harvard Law Review* 106 (1993): 1721.

71 See Margaret Radin, "Market-Inalienability," *Harvard Law Review* 100 (1987): 1849–906.

72 See Signithia Fordham and John Ogbu, "Black Student School Success: Coping with the Burden of 'Acting White,' " *The Urban Review* 18 (1986): 1–31.

73 Peggy McIntosh, "White Privilege: Unpacking the Invisible Knapsack," *Independent School*, Winter, 1990, pp. 31–36.

74 Laurie Fuller, "Whiteness as Performance" (Unpublished preliminary examination paper, University of Wisconsin–Madison, 1994).

75 Kozol, *Savage Inequalities*, p. 93.

76 Ibid., p. 96; emphasis added.

77 Harris, "Whiteness as Property," p. 1735.

78 David Spener, "Transitional Bilingual Education and the Socialization of Immigrants," *Harvard Educational Review* 58 (1988): 133–53.

79 H. G. Bissinger, "When Whites Flee," *New York Times Magazine*, May 29, 1994, pp. 26–33, 43, 50, 53–54, 56.

80 Derrick Bell, *Race, Racism, and American Law* (Boston: Little, Brown, 1980).

81 We assert that the current movement toward African-centered (or Africentric) schools is not equivalent to the racial exclusion of vouchers, or choice programs. Indeed, African-centeredness has become a logical response of a community to schools that have been abandoned by whites, have been stripped of material resources, and have demonstrated a lack of commitment to African-American academic achievement.

82 Oakes, *Keeping Track*.

83 James A. Banks, "Multicultural Education: Historical Development, Dimensions, and Practice," in *Review of Research in Education*, vol. 19, ed. L. Darling-Hammond (Washington, D.C.: American Educational Research Association, 1993), p. 3.

84 George Washington Williams, *History of the Negro Race in America from 1619–1880: Negroes as Slaves, as Soldiers, and as Citizens* (2 vols.) (New York: G. P. Putnam & Sons, 1882–1883). On the intergroup education movement, see, for example, L. A. Cook and E. Cook, *Intergroup Education* (New York: McGraw-Hill, 1954); and H. G. Traeger and M. R. Yarrow, *They Learn What They Live: Prejudice in Young Children* (New York: Harper and Brothers, 1952).

85 See, for example, Vincent Harding, *Beyond Chaos: Black History and the Search for a New Land* (Black Paper No. 2) (Atlanta: Institute of the Black World, August 1970); J. Blassingame, ed., *New Perspectives in Black Studies* (Urbana: University of Illinois Press, 1971); James A. Banks, ed., *Teaching Ethnic Studies* (Washington, D.C.: National Council for the Social Studies, 1973); and Geneva Gay, "Ethnic Minority Studies: How Widespread? How Successful?" *Educational Leadership* 29 (1971): 108–12.

86 Banks, "Multicultural Education."

87 In 1988 at Stanford University the inclusion of literature from women and people of color in the Western Civilization core course resulted in a heated debate. The university's faculty senate approved this inclusion in a course called Cultures, Ideas, and Values. The controversy was further heightened when then Secretary of Education William Bennett came to the campus to denounce this decision.

88 In the "Book Notes" section of the *Harvard Educational Review* 64 (1994): 345–47, Jane Davagian Tchaicha reviews Donaldo Macedo's *Literacies of Power* (Boulder: Westview Press, 1994) and includes two quotes, one from noted conservative Patrick Buchanan and another from Macedo on multiculturalism. According to Buchanan, "Our Judeo-Christian values are going to be preserved, and our Western heritage is going to be handed down to future generations, not dumped into some landfill called multiculturalism" (quoted in Tchaicha, p. 345). Macedo asserts that "the real issue isn't Western culture versus multiculturalism, the fundamental issue is the recognition of humanity in us and in others" (quoted in Tchaicha, p. 347).

89 In New York City, controversy over the inclusion of gay and lesbian issues in the curriculum caused vitriolic debate among racial and ethnic groups who opposed their issues being linked to or compared with homosexuals. Some ethnic group members asserted that homosexuals were not a "culture" while gay and lesbian spokespeople argued that these group members were homophobic.

90 Shirley Torres-Medina, "Issues of Power: Constructing the Meaning of Linguistic Difference in First Grade Classrooms" (Ph.D. diss., University of Wisconsin–Madison, 1994).

91 Richard Delgado, "Enormous Anomaly? Left-Right Parallels in Recent Writing about Race," *Columbia Law Review* 91 (1991): 1547–60.

92 See Bell, *And We Are Not Saved.*

93 See Cameron McCarthy, "After the Canon: Knowledge and Ideological Representation in the Multicultural Discourse on Curriculum Reform," in *Race, Identity and Representation*, ed. C. McCarthy and W. Crichlow (New York: Routledge, 1994), pp. 290; and Michael Olneck, "Terms of Inclusion: Has Multiculturalism Redefined Equality in American Education" *American Journal of Education* 101 (1993): 234–60.

94 We are particularly cognizant of the hard-fought battles in the academy waged and won by scholars such as James Banks, Carlos Cortez, Geneva Gay, Carl Grant, and others.

95 Tony Martin, *Race First: The Ideological and Organizational Struggles of Marcus Garvey and the Universal Negro Improvement Association* (Dover, Mass.: The Majority Press, 1976).

96 Marcus Garvey, cited in ibid., p. 22.