

Brown v. Board of Education and the Psychology of Racism in Education

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In 1954, the United States Supreme Court decided the case of *Brown v. Board of Education of Topeka* (347 U.S. 483). The decision outlawed segregation in American public schools and overturned *Plessy v. Ferguson* (163 U.S. 537), an 1896 decision that had declared separate but equal education for blacks and whites constitutional. Although this milestone decision by the highest court has been generally considered to be an important turning point in constitutional law, the decision also marked a paradigm change in education because of the utilization of psychological research as a key rationale for the ruling. The *Brown* decision established that the psychological impact of segregation on the educational system can produce detrimental effects on the individual, and is therefore a denial of the constitutionally guaranteed right of equal protection under the law as enshrined in the fourteenth amendment. The decision is important because for the first time in American jurisprudence regarding education, the welfare of the individual not the state was of paramount importance. Moreover, the introduction of empirical research as an integral part of education has had important and lasting effects on the development of modern pedagogy, and has served to move the policy focus from the needs of business or the state, toward the developmental and social needs of the student. Essentially, *Brown* meant that the desires of the state or even the federal government were secondary to the psychological needs of the individual.

Background

The *Brown* decision was based on the Supreme Court's interpretation of the Constitution; essentially saying that States do not have the right to segregate schools (to engage in *de jure* discrimination), because doing so is a violation of the so called "equal protection clause" of the fourteenth amendment. The rationale for arriving at the decision had clear psychological

implications. To separate schools by race, the court theorized, was damaging to black (as well as white) students' self-esteem, thus precluding them from the opportunity to learn on an equal basis. The court overturned the earlier rationale of the *Plessy* case that stated that segregation caused no psychological damage to children. The *Brown* decision relied on an earlier ruling in Topeka, Kansas, brought about by the same plaintiffs, which acknowledged that "the sense of inferiority [arising from discrimination] affects the motivation of a child to learn. Segregation with the sanction of the law, therefore has the tendency to retard the educational and mental development of Negro children" (Patterson, 2001; pg. 34).

The psychology of racism

The psychological basis of the argument against *de jure* segregation rested primarily on the controversial work of Kenneth and Mamie Clark, a husband and wife team of psychologists who had performed psychological evaluations of Black children using dolls (Clark and Clark, 1948). The Clarks testified in *Briggs v. Elliott*, a case that was later incorporated on appeal into *Brown* (Clark, 1953). Using white and brown dolls, the Clarks studied the psychological inclinations of black children and attempted to show that their preference for white dolls was indicative of low self-esteem. The work of the Clarks was corroborated by other studies, nine of which are listed on footnote eleven of the decision. It was argued before the Supreme Court justices that based on scientific research, there was ample scientific evidence that "the humiliation that these children have been going through is the type of injury to the minds that will be permanent as long as they are in segregated schools" (pg. 25).

On May 17th, 1954, the court decided unanimously (9-0) in favor of the available scientific evidence, despite of the fact that The Clarks' experiments were widely criticized at the time and later found to have been flawed. However, the importance of the experiments was not

in their reliability but in the fact that their introduction into the court's decision-making process, produced a dramatic paradigm change in the educational system towards research based pedagogy.

Zirken and Cantor (2004) argue convincingly that although *Brown* failed to end racism in America. It did provide a roadmap for the development of the modern educational system in at least three ways. First, the decision articulated for the first time the critical role education in modern America. Second, *Brown* showed via scientific evidence that the suffering people endured from racism and segregation correlated with real, measurable psychological damage. Third, that inequality, especially when sponsored by the state was harmful to the well-being of students, and detrimental to the future of the nation (pg. 3). Hence, it is the psychological legacy of the landmark decision, not the legal, which has proven to be most important to American education; specifically because *Brown* opened the door for placing "questions of identity, intergroup relations, and the psychology of prejudice and discrimination to the forefront of discussions that educators and the public have regarding educational policy" (pg. 11). Moreover, *Brown* established the legal foundations for the concepts of educational justice and multiculturalism in education. The importance of the decision therefore, is in the court's recognition that the psychological needs of the student take priority over state or federal rights; that is to say, that laws which have the result (intended or unintended) of producing psychological harm in students are unconstitutional.

Brown is without doubt one of the most important milestones in American constitutional law and Education. It delineated the boundaries of permissible racism in the educational system and established the psychological well-being of children as the core principle of educational

policy. It is clear that the explicit intent of ending segregation in schools has not been achieved, however the idea that educational policy must be child-centered and must promote psychological well-being has had a transformational effect on the way American children are educated.

Conclusion

Almost 60 years have elapsed since *Brown v. Board of Education* redefined the foundations of American education. During this time, developmental psychology has become not just a convenient rationale for multiculturalism and desegregation, but the keystone of modern pedagogy. The ruling placed the child in the center of educational policy for the first time in American education, and opened the door to the development of a pedagogy based on scientific research.

As education moves into the information age, and the age-old battles between the States and the Federal Government are replayed in a post-industrial context. The importance of *Brown* becomes all the more evident. In the 21st century questions such as, do children have the right to equal access to technology? Place *Brown* on a new dimension. It could be argued that the modern school system is technologically segregated along socioeconomic lines, yet it is not equal because poorer districts have lesser access to information technology than wealthier districts. Does the fourteenth amendment require that if one school district provides e-reader for its students, all students in America must be given one?

These and many other questions highlight the importance of *Brown* as a milestone in American Education, both as a reminder that racism is unconstitutional, but also as a clear and

unequivocal argument that the future of the nation depends on the psychological health of the children.

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