

# Is Equity Attainable in Education?

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*Schools are more segregated than ever before although the United States has experienced more diversity within its fabric since the Brown v. the Board of Education decision of 1954. In the 1990s, three Supreme Court cases helped to turn the clock backwards towards more segregated K-12 public schools. In this article, these cases are highlighted and one additional Supreme Court case is discussed. The author finds that the decisions for these court cases provide support that the original Brown v. Board of Education decision of 1954 could be attributed to Bell's interest convergence theory where the minority groups benefitted because the majority group also benefited. The minority groups were not supported because the majority groups did not stand to gain from the court cases in the 1990s. Social equity and fairness for all children to receive quality education in this country is a critical issue that needs to remain in the forefront of the minds of education policymakers and citizens concerned about public schools.*

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Social equity and educational quality have become synonymous in the national discussion of providing better opportunities for all Americans. Frederickson (1990) discussed social equity as an important component of public administration, but in looking back over two decades, Americans have become increasingly divided in terms of society, economics, and politics. While leaders in government, education, and business continue to talk about social equity, the reality is that the growing gap between the “haves” and “have nots” has widened substantially (Wolff, 2009). This situation is especially apparent in schools and education.

Four court cases have had a negative effect on school integration. Since the 1990s, Georgia, Missouri, North Carolina, and Oklahoma were affected directly by Supreme Court rulings that favored increased segregation. Three of the cases were decided by the Supreme Court, with the fourth case (North Carolina) not heard by the court. The purpose of this article is to increase awareness of how these four court cases that show a pattern of turning the clock back on integrated schools have had a negative effect on social equity in public education. Many efforts by public school districts to desegregate their schools have been

eliminated as a result of these cases. Consequentially, many minority students in these schools face greater isolation and inequitable educational experiences.

This controversial issue is salient in promoting social and educational equity for all children. Newspaper articles published in the geographical areas of interest and at the times when the cases were being heard were examined to determine if Bell's interest convergence theory was relevant in the court's decisions.

While the United States Supreme Court ruled that school segregation was unconstitutional more than 50 years ago, a study from "The Civil Rights Project of Harvard University" (Orfield, Wald, & Sanni, 2001) found that much of the progress in reducing school segregation among African American students since the 1960s was eliminated in the 1990s. During this decade, the four court cases and three decisions by the U. S. Supreme Court contributed to limiting desegregation remedies.

Orfield (2001) in "Schools More Separate: Consequences of a Decade of Resegregation" examined statistics about school desegregation during the 1998-1999 academic year. The key findings of this study were:

1. 70.2% of African American students in the United States were attending schools with a majority of minority students (a substantial increase from 62.9% in 1980);
2. more than 33% of African American students attend schools minority enrollments from 90 to 100%;
3. between 1988 and 1998, African American students in predominately White schools decreased from 44% to 33%;
4. Latino students, now the largest minority in U. S. schools, are substantially more segregated, with 36.6% of Latino students attending schools with Latino populations ranging from 90 to 100%;
5. Caucasian students remain the most segregated, with Caucasian students generally attending schools with more than 80% Whites and less than 20% minorities.

According to the National Center for Education Statistics (NCES, 2006), racial and ethnic distributions of students are changing to reflect a global society. They indicated that 42% of students enrolled in public schools were members of a minority, an increase from 22% in 1975. In contrast, during the same time period, European American enrollment decreased 20%, from 78% to 58%. For more than 30 years, Latinos, now the largest minority, have become increasingly isolated. The greatest change was among Latino students increasing from 6% of public school enrollment in 1975 to 19% in 2006. The level of segregation for Latinos is greater than for African Americans. Regardless of the ethnicity of the student, increased segregation typically results in reduced social equity for all students.

In tracing desegregation efforts from the *Brown vs. Board of Education* decision in 1954, the first attempt to integrate public schools, to the Supreme Court cases in the 1990s, which reversed desegregation policies, the relevance of Bell's (2004) interest convergence theory is supported. Bell's theory of interest convergence was developed to clarify the ways in which African Americans and other minorities gain protection from the "multifaceted forms of discrimination that threaten their well-being and undermine their rights . . . [he de-

defined this theory as] Black rights are recognized and protected when and only so long as policy makers perceive that such advances will further interests that are their primary concern” (p. 49). Bell argued that racial discrimination is only relieved when policymakers are aware that the nation or the majority will benefit from this relief. An example of interest convergence put forth by Brophy (2008) was that the Supreme Court’s decision in *Brown v. Board of Education* decision of 1954 was driven largely by the political agenda in the United States at the time of the case. The United States would have a difficult time supporting human rights internationally during the cold war if its agenda did not support human rights nationally. Additionally, the northern states were imposing this decision on the people in the south. Bell (2004) further asserted that interest convergence was obtained when the interests of African American plaintiffs in *Brown v. Board of Education* decision of 1954 converged with the European American majority’s agenda for human rights.

### **Theoretical Framework**

#### *Background on Social Equity in Public Administration*

Frederickson (1990) indicated that over time, the definition of social equity became broader:

Social equity is a phrase that comprehends an array of value preferences, organizational design preferences, and management style preferences. Social equity emphasizes equality in government services. Social equity emphasizes responsibility for decisions and program implementation for public managers. Social equity emphasizes change in public management. Social equity emphasizes responsiveness to the needs of citizens rather than the needs of public organizations. Social equity emphasizes an approach to the study of and education for public administration that is interdisciplinary, applied, problem solving in character, and sound theoretically. (pp. 228-229)

Other organizations have developed definitions of social equity. For example, Conservation Economy (2003) has defined social equity as:

fair access to livelihood, education, and resources; full participation in the political and cultural life of the community, and self-determination in meeting fundamental needs. As Martin Luther King observed, ‘injustice for one, is injustice for all.’ Social equity [equality] is the cornerstone of social capital, which cannot be maintained for a few at the expense of many. (p. 1, para. 1)

According to Svava and Brunet (2004), the National Academy Public Administration Social Equity Panel provided the starting point:

The fair, just and equitable management of all institution serving the public directly or by contract, and the fair, just and equitable distribution of public services, and implementation of public policy, and the commitment to promote fairness, justice, and equity in the formation of public policy. (p. 6)

The *Declaration of Independence* states that all men are created equal with certain inalienable rights. The rights issue continues to play key roles in metropolitan politics. According to Oliver and Shapiro (1995), economic and wealth differences between African Americans and European Americans underlie the permanence of social and economic inequities in the United States. When considered in the aggregate, zero or negative financial assets generally are found among African American families. For every dollar that White middle class families have in wealth, African American middle class families have 15 cents. Oliver and Shapiro (1995) asserted that barriers to social equity include: heritage of slavery and the reconstruction era, limited educational opportunities, redlining practices that restrict access to capital, and development of the modern suburb. These barriers have been identified as impediments to African American economic success. Oliver and Shapiro (1995) indicated that three layers of inequality are responsible for observed racial differences in financial wealth: (a) social distinctions in human capital accumulation and market operations, (b) institutional and policy factors (i.e., limited access to mortgage and housing markets and artificial barriers associated with other credit markets); and (c) intergenerational transmission of wealth. These social inequities can include further segregation in poor schools that can limit children's ability to become economically and socially successful.

According to Frederickson (1990), social equity theory should be the third pillar of public administration, with the same status as economy and efficiency as values or principles to which public administration should adhere. His rationale for developing this theory was:

To say that a service may be well managed and that a service may be efficient and economical, still begs these questions: Well managed for whom? Efficient for whom? Economical for whom? We have generally assumed in public administration a convenience oneness with the public. We have not focused our attention or concerns to the issue of variations in social and economic conditions. It is of great convenience, both theoretically and practically, to assume that citizen A is the same as citizen B and that they both receive public services in equal measure. This assumption may be convenient, but it is obviously both illogical and empirically inaccurate. (p. 228)

### *Social Equity in Education*

A study by Moore (2001) examined equity value in public administration. An investigation of school resource equity in New Jersey during the 1990s found,

. . . significant resource inequalities based on wealth and to a lesser extent race persist among New Jersey's school districts. Poor districts continue to have fewer resources (except non-instructional staff) than wealthy districts. Noninstructional staff appears to be the only resource distributed equitably among all school districts. (p. iv)

However, a greater percentage of minority students are enrolled in districts with low socioeconomic statuses. Moore (2001) argued that race and socioeconomic disparities con-

tinue, although some differences have been reduced (e.g., state and local revenues, teacher salaries, more instructional and noninstructional staff, and teacher/pupil ratios).

Parents expect public schools to provide their children with quality educational experiences regardless of neighborhood composition. They want teachers to care about their children and the schools to provide a safe environment that encourages all students to succeed academically. The federal government has recognized that schools are not equal and that children learn better in some neighborhoods than in others. The passage of the No Child Left Behind Act was an attempt to increase equity across all schools. Standards, imposed by the federal government and supported by the states, were intended to eliminate the inequity among school districts that have increased differences among socioeconomic levels (Ellis, 2007).

In the United States of America, people cannot be forced to live in diverse neighborhoods. Many ethnic groups that are included in minority categories (e.g., African Americans, Arabs, Latinos, Asians, etc.) often choose to live in neighborhoods that mirror their characteristics and values. Residential segregation remains a fact of American life and has major ramifications in determining the quality of schooling available to minorities. Property values of the minority middle and working class appreciates slower than that of the European American middle and working class, thus increasing the gap in wealth between minorities and European Americans; and concentrating poverty in minority neighborhoods (Wolff, 2009).

Research by Massey and Denton (1998) found that affluent African Americans who could afford to move outside the inner city did not want to live in European American neighborhoods. This self-imposed segregation adds to segregation in public schools, with the student population reflecting the community that surrounds the school. While many affluent African Americans choose to remain in segregated areas, they tend to send their children to private schools, where they may have more diverse educational experiences. Massey and Denton (1998) argued that:

African American segregation remains universally high while that of Hispanics and Asians falls progressively as status rises. Only African Americans experience a pattern of constant, high segregation that is impervious to socioeconomic influences. The persistence of racial segregation in American cities, therefore, is a matter of race and not class. The residential segregation of African Americans cannot be attributed in any meaningful way to the socioeconomic disadvantages they experience, however serious these may be. (p. 88)

### **United States Supreme Court Cases Involving Desegregation**

According to Kinder and Sanders (1996), the judicial branch has promoted equal opportunities in education more often than either the legislative or executive branch of the federal government. Segregation in public schools was a reality in the United States during the first half of the 20th century. On May 17, 1954, Chief Justice Earl Warren presented a unanimous Supreme Court decision in the *Brown v. Board of Education* decision of 1954 that the doc-

trine of “separate, but equal,” in terms of public education was unconstitutional. This decision supported the conjecture that educational institutions that were segregated by race were “inherently unequal.”

Conversely, Orfield, Wald, and Sanni (2001) asserted that segregation continued to intensify during the 1990s. The investigators found that since the 1960s, the desegregation progress of African American students had been minimized, with three decisions by the Supreme Court affecting desegregation solutions. Orfield et al. also indicated that the nation’s largest minority, Latinos, were becoming more isolated and their segregation was at higher levels than that experienced by African Americans. Resegregation is occurring in spite of the increasing diversity in the nation’s student body. For example, Latino student populations have increased by 245% since 1970. This movement back to segregated schools is having a negative effect on the quality of education between schools with a majority European American population and those with a greater proportion of minority students. Orfield et al. further argued that the increased segregation in the schools result in majority and minority students experiencing unequal educational outcomes.

The goal of desegregation in education was to create unitary school districts. A unitary school district is one that has eliminated a “racially segregated dual school system” (Pinellas County Schools, n.d.). According to Madden (1999), unitary status is defined as:

A school system has successfully removed all the patterns of segregation that existed up until 1971 in the following areas: Quality of Education, Student Assignment, Extracurricular Activities, Transportation, Facilities and Resources, Instructional Staff, and Administrative Staff. (p. 1)

To determine if a school district has attained unitary status, seven factors are considered:

1. Extracurricular activities – All students are allowed and encouraged to participate in all school-sponsored activities (e.g., athletics, music, academics, interests, leadership and honor).
2. Transportation is made available to all students, regardless of race.
3. Administrative staff assignment ensures that minority administrators are assigned to all schools; and programs to prepare new administrators are available to all school faculty, regardless of race.
4. Relative quality of education is to improve academic achievement of all students, establish goal aspirations for all students, and use continuous improvement processes in all schools.
5. Faculty assignment requires the school district to assign African American teachers in all school buildings, continue recruitment efforts for African American teachers, and list the shortage of African American teachers in critical teacher shortage areas.
6. Facilities and resources require equitable renovation to all schools in the district and provide nondiscriminatory educational resources (e.g., textbooks, libraries, technology, furniture, etc) to all schools.

7. Student assignment requires the district to create a student assignment plan that ensures all children will receive equal education regardless of the schools to which they are either assigned or choose to attend (Pinellas County Schools, n.d.).

Since the 1954 Supreme Court decision *Brown v. Board of Education* decision of 1954, school districts have been mandated to desegregate public schools and provide equality in education that include both quality and access (Carter, 1995). However, more African American children are being educated in public schools that are all or have a majority of African American students enrolled. According to Carter, these schools (generally located in urban or inner city areas) are inherently unequal in regard to quality of education, facilities, and educational offerings when compared to European American suburban schools. Students in the segregated schools typically have lower standardized test scores (e.g., reading, writing, and mathematics), poorer graduation rates, and lower parent involvement.

### Methods

The methodology in this article includes critical reviews of the four court cases using court case decisions and reviews of newspaper articles written from two years prior to and two years after the decision (retrieved from the NewsBank data base). These articles were related to each of the court cases and published in the states to determine how the cases were presented in the media before and after the decisions. Data from the website, School Data Direct, were used to indicate the current racial breakdowns in the four school districts included in this article. In addition, the author provides a discussion of how the court cases were settled in accordance with the interest convergence theory.

### Court Cases

Since the early 1990s, the Supreme Court has ruled on cases that limit desegregation and allow school districts to become more segregated. These cases in the 1990s included: (a) *Oklahoma v. Dowell et al.* (1991), (b) *Freeman v. Pitts* (1992), and (c) *Missouri v. Jenkins* (1995). The Supreme Court decisions on these three cases limited the effects of desegregation. In 2002, *Belt v. Charlotte-Mecklenburg Board of Education* was presented to the Supreme Court. They refused to hear the case, resulting in a return to state and local control over the schools.

#### *Oklahoma v. Dowell et al.*

The *Oklahoma v. Dowell et al.* (2002) case was initiated by African American parents in 1961 who challenged racial segregation in Oklahoma's public schools, which used a dual system of education, with separate schools for African American and European American students. The federal district court ended the case in 1977, with the explanation that intentionally segregated school districts had attained unitary status (one system for all students). In 1985, the school district created the Student Reassignment Plan (SRP) that used attendance zones in segregated residential areas to assign school placement. As a result of these changes, the majority of the district's 64 elementary schools (n = 33) became racially iden-

tifiable, with more than 90% of students from a single racial group (Baker, 2002). Eleven schools had 96.9% to 99.7% African American enrollment, and 44% of the African American children in K-4th grades assigned to all African American schools. The parents decided to reopen the case. The case went through the normal judicial processes and was presented to the United States Supreme Court in 1990. The decision in 1991 favored the school district. The court's majority decision indicated that:

. . . a desegregation remedy should be terminated when the school district has complied in good faith with all court orders for a reasonable time and when vestiges of past discrimination had been eliminated to the extent practicable. This determination must consider every facet of operation of the schools, including student assignments, faculty, staff, transportation, extracurricular activities, and facilities. (Baker, n.d., p. 1, & 3)

The intent of this decision was to return control of the schools to local boards of education.

The presentation of this case in newspapers in Oklahoma provided additional information regarding the environment at the time of the decision. In an article in *The Daily Oklahoman* by Robinson and Bratcher (2004), the authors pointed out what experts considered a fatal flaw in the *Brown v. Board of Education* decision of 1954 case: "The May 17, 1954, decision affected only segregation within a district. It did nothing to mandate desegregation across districts, even when they abut [are contiguous] one another in metropolitan areas" (p. 1, &5). Desegregation orders were in-district only, with many European Americans moving to different districts with a small percentage of African Americans to avoid having their children bussed to integrated schools. Robinson and Bratcher reported that in the 30 years between 1970 and 2000, European American school enrollment in Oklahoma City Schools decreased by nearly 25,000 students. African American middle-class parents also moved to other school districts because of desegregation. African American enrollment dropped by 550 students during the same period. In 2007, the district enrollment included European American (23%), African American (32%), Hispanics (37%), and other (8%; School Data Direct, 2009).

### *Freeman v. Pitts*

The Supreme Court, in *Freeman v. Pitts* (1992), was asked to decide if a district court could relinquish supervision of a school district's efforts to desegregate by partially removing supervision of a school district's efforts, declaring unitary status to some aspects of a system's operations while maintaining supervision of other aspects of desegregation efforts. The district court found that the school district was unitary in regard to student assignments, transportation, physical facilities, and extracurricular activities, but had not attained unitary status in regard to faculty assignments and resource allocation. The Supreme Court justices, in the *Freeman v. Pitts* 1992 decision, reversed the lower court's decision, indicating that a court could order incremental (or partial) removal of judicial supervision and control regarding compliance, while retaining supervision in areas of noncompliance. The result of

this decision provided additional support to restore local and state authority of school systems in regard to segregation in public schools.

The presentation of this case in newspapers in Georgia provided additional information regarding the environment at the time of the decision. Head (1992) asserted that time was needed to determine the effect of *Freeman v. Pitts* on the hundreds of active school desegregation cases across the country. By saying compliance with desegregation orders could be achieved in stages, the Supreme Court had given school systems an easier path to remove themselves from court supervision. However, lower court judges have been left with great discretion in determining when the magic point is reached. African American enrollment dropped by 550 students during the same period. In 2007, the district enrollment included European American (10.1%), African American (75.7%), Hispanics (8.5%), and other (3.3%; School Data Direct, 2009).

Therefore, be aware of judges' views concerning desegregation is important as they serve in positions where they are expected to make decisions on desegregation. How they use their authority is central because the judges at the lower court have a significant level of discretion. It can open the door for interest convergence to play a role in regard to the types of decisions from lower court judges as related to policies concerning desegregation.

### *Jenkins v. Missouri*

The third Supreme Court decision was *Jenkins v. Missouri*. This case, decided in 1995, reversed a Court of Appeals decision from the Eighth Circuit Court. The Court of Appeals approved a desegregation plan that required the state of Missouri to assume more than 50% of the \$1.3 billion spent to improve the once segregated school system (Hall, n.d.). The remedies involved, among other actions, establishing magnet schools, lowering class sizes, drawing students from surrounding European American suburbs, and increasing taxes. According to Hall, the state of Missouri argued that such standards were "outcomes based" and entirely beyond any constitutional requirement to provide equal opportunity under the equal protection clause of the 14th Amendment. The Supreme Court's decision was in favor of Missouri.

According to Heaney and Uchitelle (2004), peaceful desegregation was accomplished in St. Louis under very difficult conditions. The desegregation plan was developed by local educators, not a judge, and was acknowledged to meet the directives of the U.S. Constitution. Sudden educational change was implemented in St. Louis, with the public schools receiving many new resources. As a result, the school district's rating in the state was upgraded and racial change within the city was reversed, with the proportion of European Americans in the schools remaining constant for nearly a generation.

The desegregation plan provided evidence that developing a plan that increased minority access to suburban schools with majority European American student populations was possible (Heaney & Uchitelle, 2004). This plan had extensive support among educational leaders, created a major demand for access to suburban schools by African American families, and resulted in a substantial number of European American students transferring from suburban schools to the St. Louis magnet schools created under the plan. These schools broke the widely held stereotype about educational failure in the city.

The increase of segregated schools in the United States has resulted from judicial decisions in the 1990s. The St. Louis story provides no simple answers, and its positive findings are being challenged by the resegregation U.S. Supreme Court decisions in the 1990s. These decisions ultimately have resulted in phasing out the plan that produced many gains achieved over a quarter-century (Heaney & Uchitelle, 2004).

The presentation of this case in newspapers in St. Louis provided additional information regarding the environment at the time of the decision. According to an article in the *St. Louis Post-Dispatch*, “We know when school desegregation was born, and now we know when school desegregation began to die. It began with *Brown v. Board of Education* decision in 1954. It probably started to die last week with *Missouri vs. Jenkins* – the Kansas City school case” (Eagleton, 1995, p. 1, &1). Eagleton pointed out, “The Supreme Court, in an opinion written by Chief Justice William Rehnquist, said in *Missouri vs. Jenkins* that low achievement levels were no longer a reason for schools to stay under judicial control. Rehnquist wrote:

The district court should sharply limit, if not dispense with reliance on this factor . . . . The district court must bear in mind that its end purpose is not only to remedy the violation to the extent practicable, but also to restore state and local authorities to the control of a school system that is operating in compliance with the Constitution” (p. 1, &5).

In 2007, the district enrollment included European American (13.7%), African American (64.5%), Hispanics (19.6%), and other (2.2%; School Data Direct, 2009).

#### *Belk v. Charlotte-Mecklenburg Board of Education*

In a lawsuit started in 1997, parents sued the Charlotte-Mecklenburg School System, charging that the school district was not fully desegregated. The case went through the lower courts and was heard by the Fourth Circuit Court in 2002. The court’s decision was that the school had achieved unitary status. In 2002, the U. S. Supreme Court decided not to hear another desegregation case, *Belk v. Charlotte-Mecklenburg Board of Education*. This decision let the Fourth Circuit Court’s decision stand that the district had achieved unitary status.

According to Orfield (2001), these three court decisions at the Supreme and Appellate levels have helped increase segregation in schools. In 2007, a majority of Supreme Court justices ruled against integration in the Seattle School District and Jefferson County Board of Education cases (Wells & Frankenberg, 2007). These two districts adopted plans to desegregate schools to eliminate based on mandatory reassignments of students based on race allowing parents and students to select a racially diverse school. Using this program, more than 90% of the students were assigned to either their first or second choice of schools. This integration plan has been adopted by many school districts nationally. However, “five of the nine Supreme Court justices declared these [integration plans] unconstitutional” (p. 1, &6), indicating that the race of individual students cannot be considered when assigning them to schools unless the program has been developed to “remedy the harms of de jure or Jim Crow segregation” (p. 1, &6). The justices ruled that this type of integration plan vio-

lated the 14th Amendment rights of European American students. When maximum enrollment was achieved for European Americans and they did not get their first or second choice of school, the justices ruled that these students were denied equal protection under the law.

In the article, "Interring a Dream: The quiet death of school integration," Kirp (2002) asserted that

. . . *Belk v. Charlotte-Mecklenburg* has a very special significance. It returns to the scene of the 1971 Supreme Court decision in *Swann v. Charlotte-Mecklenburg board of Education*, the first time the justices said that African American and European American school children could be bused for purposes of integration. As with every desegregation case since the landmark 1954 judgment in *Brown v. Board of Education*, the ruling in *Swann* was unanimous, but insiders later reported that the Court had been badly split. Five justices had been ready to embrace a uniform national standard holding that all children have a constitutional right to an integrated education, whether or not their school district was once officially segregated but they backed off in favor of preserving unanimity. (p.1 &4)

According to School Matters Direct, the district enrollment in 2007 included European American (36.1%), African American (42.4%), Hispanics (13.7%), and other (4.8%; School Data Direct, 2009).

## Discussion

The four *court cases* aforementioned in detail have had a negative effect on school integration. Georgia, Missouri, North Carolina, and Oklahoma were affected directly by Supreme Court rulings that favored increased segregation since the 1990s. As a result of these cases, many efforts made by public school districts to desegregate their schools have been eliminated, resulting in greater isolation of minority students in schools that are failing to meet the needs of these students. Several suggestions have been made to mitigate these *court cases* and increase integration within school districts. However, the courts argued that each suggested remedy violated the 14th Amendment rights to provide equal opportunity under the equal protection clause.

The decisions for these *court cases* provide greater support that the original *Brown v. Board of Education* decision of 1954 could be attributed to Bell's interest convergence theory where the minority groups benefitted because the majority group also benefitted. The minority groups were not supported because the majority groups did not stand to gain from the *court cases* in the 1990s.

## Recommendations

Social equity is more than race, socioeconomic status, and ethnicity/culture. In regards to education, social equity is fair distribution of resources that provide all children with quality educational experiences in schools equipped with similar effective teachers and technology. The racial or socioeconomic distribution of students and teachers within the schools

should not be factors that affect student outcomes, especially on standardized tests. *Court cases* within the last 20 years have resulted in greater racial segregation in schools, with students in urban areas and those from low socioeconomic backgrounds forced to attend schools without adequate resources to enhance quality educational experiences. To ameliorate these inequities, state boards of education may need to consider redrawing school district boundaries or consolidating school districts to encourage greater diversity with the school. Public school districts also need to collaborate in sharing plans and strategies being used to achieve social equity and improve educational quality for all children. Schools should be providing all children with equal access to a quality education that can help them become effective citizens in a diverse society.

### Further Research

Additional empirical and qualitative studies are needed to investigate the long-term effects of the *court cases* decided since 1990. The findings from this type of research may support the assertion that these *court cases* have resulted in greater inequity in the distribution of educational resources for all students. Research also is needed to determine if integration can be achieved in public schools given the potential confounding variables (e.g., barriers of segregated housing, poverty, and other issues that contribute to segregated public schools) that can result in inaccurate findings and misinterpretation of the results.

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