

“Race is... race ain't”: an exploration of the utility of critical race theory in qualitative research in education

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Critical race theory (CRT) has garnered increasing attention from various circles and disciplines as an emerging perspective in jurisprudence scholarship addressing race. CRT scholarship encompasses and borrows from a myriad set of sociopolitical and philosophical critiques that challenge the objective reality of the law and of legal doctrine and interpretation. CRT scholars have argued that racism is an endemic part of U.S. social relations and this racism has shaped the laws and policies of U.S. institutions. Recently, scholars in education have started to explore the utility of CRT and the ways theories about race can explain the social construction and operation of racism in educational institutions. This paper continues this inquiry by briefly illustrating how CRT can be used in the higher education affirmative action debate surrounding the *Hopwood v. Texas* decision (1996). Specifically, the presentation of definitive race-neutral legal interpretations of narratives vs. counterstories of race is discussed with summary attention paid to the implications for qualitative research on race and education.

The picture and the purpose¹

Email message, received by Larry Parker at the University of Utah-Salt Lake City, UT (February 3, 1997): “Larry can you please send a short narrative and a picture of yourself because I think they are going to do some publicity for your talk here in April on Critical Race Theory and Education. Thanks.”

In my mind I know that I should send a picture to my friend and colleague along with a brief description of my Critical Race Theory and Education talk on April 28 at a university on the west coast of the USA. But it is the middle of the quarter here, and I am heavily involved in the usual academic stuff like teaching, serving on committees, working with doctoral students on proposals, starting to get organized for the Research Focus on Black Education SIG activities at the upcoming annual meeting of AERA (American Educational Research Association), and fielding requests for campus and local speaking engagements during Black History Month. So juggling everything has been mind boggling. I have known my colleague for over 10 years, through her research and at professional meetings, and she has invited me out to her university to give this talk in April. I want to send her the picture, but I just do not have the time. Besides, I never like the way those instamatic small headshot pictures of me come out. I end up looking like another “black male suspect” featured in the FBI wanted shots of the most sought after criminals that one sees in the post office from time to time.

So I respond to her email with, “I am sorry, but I just do not think I will have time to get a picture to you. I can send a brief description of the talk so you can use it for publicity purposes soon OK? Thanks, Larry.”

April 26, 1997 – I am flying to the largest town nearby my colleague’s campus a few

days before I am scheduled to give the talk on critical race theory and education. My colleague and her partner meet me at the airport. After we exchange greetings and get into the truck to head over to my hotel, my friend says, “Larry I wished you had sent a picture in for the publicity for the talk, because you should see what they did instead.” “They drew a picture of you, and you look like this tall white guy.” “Really,” I said, and she responded, “Yes, for some reason that is who they imagined would be giving the talk, and by the time I saw the flyers with the illustration they already had them printed up.” We laughed about it and discussed racial assumptions through images as we made our way to my hotel and then off to dinner.

April 28, 1997 (around 9 a.m.) – I get to the campus, and my friend shows me the publicity flyer for my talk, and the illustration of me, and, sure enough, it is a drawing that looks similar to a tall white male, but one with hair.

April 28, 1997 (around 4:20 p.m.) – After a late start, I explain the purpose of today’s discussion on critical race theory to the small audience of students, faculty, and staff. I introduce the talk as an overview on how critical race theory has emerged from the legal arena and the race-based critique of the law and legal policy. I also want to highlight how it connects to race and education through the previous works of Gloria Ladson Billings, William Tate, and the recent paper submissions to the special issue of the *International of Qualitative Studies in Education*. I conclude the introduction with a comment about the publicity flyer for the talk by saying that a purpose of critical race theory is to question social constructions and assumptions of race, particularly concerning whiteness, and as I pulled out the flyer to show the audience, I said “see, this is an illustration supposed to represent the speaker for today, but do I match these white male features in this drawing?” “Besides, this drawing has me with hair and no earrings,” and while I was saying this for added emphasis and a bit of humor, I took my left hand and rubbed it over my shaved bald head and touched my two hoop earrings that I happened to be wearing that day.

April 28, 1997 (around 5:10 p.m.) – After the overview of critical race theory and a summary of one of the featured papers, my friend, acting as moderator, opens it up for questions and comments. In my mind, I am expecting that the audience will ask questions about the research issues related to critical race theory, such as how is it different in epistemology and methodology from critical theory and how does CRT borrow from feminism or postmodernism? I am also anticipating that they will ask how is it grounded in the law and education? Is it just another form of racial identity politics that critiques the ideology of whiteness and privilege? How does it intersect with gender, race, social class, and other areas of difference regarding research? These are the types of questions asked about critical race theory when I presented on this before.² So I was not prepared for the first set of questions from a Chinese-American female student who pointedly asked me, “Well, that theory you discussed is fine, but what does it have to do with dealing with what students of color have to deal with here on this campus, like single mothers who need child care here and many other issues that are of concern to students of color?” Immediately an African-American female student followed up with a second concern. “She is right; we need to talk about the racism and homophobia on this very campus that is of concern to students of color and gay and lesbian students and how this ideal of diversity sometimes gets ignored.” To be sure, the other questions related to research methods, methodology, epistemology and the law did come up. However, the initial questions of the students – related to their concerns about race, single mothers, and homophobia on this campus – undergirded the conversation that eventually took all of us well into the evening potluck dinner and discussion.

The intent of this story is to illustrate the major tenets of critical theory (CRT) as it relates to qualitative studies in education. A major point of CRT is to place race at the center of analysis with respect to how many White European Americans and institutions in U.S. society assume normative standards of whiteness, which in turn ignores or subjugates African-Americans, American Indians, Chicanos-Chicanas, Chinese-Americans, and other marginalized racial groups.³ In the personal narrative, I did not send a photograph in which I felt I would look like a racialized black criminal. However, the illustration used in its place was drawn with assumed white male characteristics of a guest speaker at a college campus. Critical race theory serves to illustrate how, despite the progress of civil rights laws and good intentions to eradicate racism, it is still an endemic part of life in the USA. CRT maintains that racism has been ingrained through historical consciousness and events and that racist ideologies have directly shaped the law, racial categories, and racial privilege (Crenshaw, Gotanda, Peller, & Thomas, 1995; Delgado, 1995; Harris, 1994; Symposium, 1994).

However, the second part of the story directly questions the utility of critical race theory in institutional sites of struggle. The students raised the issues of “what will this new theory do for us marginalized groups on this campus?” To be sure, CRT scholars have expanded their use of the theory to analyze or propose race-based solutions regarding important public policy issues, such as tax law and its impact on African-Americans (Moran & Whitford, 1996) or the effects of minimum wage laws on low-income Latino and African-Americans (Hutchinson, 1997). Furthermore, critical race feminists have voiced their informed perspectives on historical and present-day intersections and conflicts related to racism, sexism, and the law (Cleaver, 1997; Harris, 1997). The critical race feminists have used personal/political racial narratives intertwined with legal analysis to address key areas of concern, such as race and sexual harassment (Cho, 1997); jobs, welfare, and mothering (Augustin, 1997); domestic violence (Rivera, 1997); and international issues related to work, patriarchy, and immigration (Calvo, 1997; Carbado, 1997). Still, the question of the utility of a “new theory on race” for empowerment is a legitimate issue of contention (Nebeker, 1997).⁴ In addition, Ladson-Billings expressed caution at the beginning of this special issue about rushing too quickly to embrace CRT in that it may result in the dilution of this critique by the mainstream educational establishment.

There are two points that I hope to cover in the remainder of this article. First, the *Hopwood v. Texas* (1996) ruling, which concerned race-based admissions and reverse discrimination claims by White European Americans, has important CRT implications for affirmative action in higher education. This judicial decision by the 5th Circuit Federal Appeals Court held that U.S. statutes and civil rights legislation are color-blind and race neutral. With that ideological reasoning, the Court banned the use of race as a consideration for admission to the University of Texas-Austin law school (and subsequently all public graduate and undergraduate programs in Texas).⁵ However, a critical race theory position on *Hopwood* and the recent passage of Proposition 209 in California, which ended affirmative action in public higher education in that state, would argue for a continuation of affirmative action to remedy past discrimination that still affects present-day normative perceptions and policy actions against racially marginalized groups on university campuses. Critical race theory seeks to uncover the legal history of racial subordination and trace how ideology (Omi & Winant, 1994) and the “language as racism and the experience of racism” (Bartolome & Macedo, 1997, p. 225) are linked to political decisions and legal rulings. These policies have a disparate impact on shaping racial conflicts between those who hold the “color-blind” perspective

in the academy and the racial concerns of African-Americans, Chicano-Chicanas, or Asian-Americans as expressed by the two students in the opening narrative.

Second, I will offer suggestions concerning the utility of CRT in education and qualitative research. Critical race theory can be viewed with skepticism in that it may not add anything different to the qualitative research debate in terms of epistemology, methodology, and methods that some researchers (e.g., feminists, critical ethnographers) have been undertaking in terms of participatory studies related to social justice issues (Donmoyer, 1997). Getting into the pros and cons of the race-based epistemological debate and CRT is beyond the scope of this paper.⁶ However, the critical centering of race (together with social class, gender, sexual orientation, and other areas of difference) at the locations where the research is conducted and discussions are held can serve as a major link between fully understanding the historical vestiges of past discrimination and the present-day racial manifestations of that discrimination. This in turn can lead to discussions and analyses of “data” through a critical race-centered interpretive framework. Furthermore, rather than ask what can this theory do for qualitative studies in education, an alternate inquiry I would propose is what can qualitative research in education do to illuminate and address the salient features of CRT with respect to race and racism in educational institutions and the larger society?

Racial neutrality versus racial reality

The most recent controversy surrounding affirmative action emerged in *Hopwood v. Texas*. This case centred on whether the University of Texas-Austin had compelling state justification for using dual racial categories for affirmative action purposes for law school admissions. In 1992, four White European American applicants were denied admission to the University of Texas-Austin school. At the time, the law school used admissions procedures that considered the applications of nonminority students, but a separate committee reviewed the applications of African-American and Chicano/Chicana students. The four rejected White European American applicants sued in Federal district court (*Hopwood v. Texas*, 1994), alleging that this system violated their Equal Protection rights under the 14th Amendment and civil rights statutes. The Federal district court held in favor of the plaintiffs but refused to bar the law school from using race in the admissions review process. The appeal went to the Federal Fifth Circuit Court of Appeals, which reversed the district court and ruled that the University of Texas Law School should not use race to achieve diversity, because the 14th Amendment required state actions in governmental affairs to be color-blind and race-neutral.

The Federal 5th Circuit Court of Appeals ruled that the law school had failed to show any notable present effects of past discrimination. Furthermore, even though African-American and Chicano/Chicana students perceived that the University of Texas-Austin was a hostile environment for minorities, this stemmed from their own perceptions of present prejudice and were not the result of direct policies created by the law school (*Hopwood v. Texas*, p. 953). The Court of Appeals reasoned that since the 1960s and the entrance of the first African-Americans into the law school, the University of Texas had attempted various affirmative action efforts to increase racial diversity. Therefore, the university was not really guilty of institutional discrimination after that time. The Appeals Court also posited that traditional thinking about affirmative action

and race-based admissions treated campus racial diversity as a solidified group category, and this perpetuated biases and ignored a person's individuality in terms of how someone should be viewed:

Diversity fosters, rather than minimizes, the use of race. It treats minorities as a group, rather than as individuals. It may further remedial purposes but, just as likely, it may promote improper racial stereotypes, thus fueling racial hostility. The use of race, in and of itself, to choose students simply achieves a student body that looks different. Such a criterion is no more rational on its own terms than would be choices based upon the physical size or blood type of applicants. (*Hopwood v. Texas*, 1996, p. 945)

In the court's view, it would be even worse to keep distinctive race-based admissions that odiously repeated the "separate but equal" status of the Jim Crow era. The Appeals Court relied on the claims of the rejected white student applicants who were victims of reverse discrimination and denied their Equal Protection rights. The judges' opinion in *Hopwood* also cited plaintiff Cheryl Hopwood as an example of fostering diversity through her status of individual achievement as a member of the Armed Forces, a wife, and the mother of a severely disabled child, as opposed to her race. In essence, the Fifth Circuit Federal Appeals Court did not view the use of race in the admissions process as fulfilling a compelling government objective to remedy past discrimination.

From a CRT perspective, the *Hopwood* opinion reinforces affirmative action being viewed as allowing lower qualified applicants into the academy or as taking jobs and admissions slots away from White European Americans. This is opposed to seeing affirmative action as a means by which the law could enable institutions to "Do the Right Thing" and be held accountable on diversity in admissions and faculty hiring (Nelson & Pellet, 1997). Ware (1996) has commented on how *Hopwood* represents the current thinking among many supporters of race-neutrality. Namely, that racial discrimination is a historical event associated with slavery and Jim Crow legal segregation. To the extent that it exists today, it is isolated and sporadic, and "the current generation should not have to bear the cost associated with creating opportunities for minorities. From here we should just play fair" (p. 45). Ware argues that this view of race-neutrality would serve to ossify the advantages of racial privilege and grant amnesty to white European Americans responsible for an unequal system. Ware also points out that the supporters of the color-blind approach have always cited merit in higher education admissions as standards to uphold for all individuals. Yet, in reality, the rule of law operates to preserve existing race, gender, and social class relations of power and privilege. This, in turn, undergirds what Ware (1996) refers to as "anecdotes of opportunities lost to less qualified minorities and women that abound in every faculty lounge" (p. 90). In addition, he challenges the position that minorities are first and foremost individuals:

One of the latest arguments made against affirmative action is that it is divisive and encourages people to think of themselves in terms of their ethnicity and group identity rather than as individuals. Racism, not affirmative action, is the culprit for these circumstances. African Americans have always had to confront society as members of a disfavored minority, since they are often judged on the basis of that status rather than as individuals. This began long before the development of any affirmative action program. (Ware, 1996, p. 90)

Critical race theory seeks to de-cloak the institutional and ideological racial purpose behind the “color-blind” myth of merit and individualism embedded in the anti-affirmative action arguments. The CRT perspective in *Hopwood* also links and traces the historical connection of discrimination at the university to the current realities of racism as seen and felt by racial minority groups on predominantly white campuses. For example, during the Jim Crow segregation period the University of Texas law school barred African-Americans from attending the campus. The *Sweatt v. Painter* (1950) U.S. Supreme Court ruling addressed discrimination against African-Americans by the University of Texas law school. This ruling was part of the initial set of higher education cases preceding *Brown v. Board of Education* (1954), the ruling that led to the eventual dismantling of legal segregation in educational institutions such as the University of Texas law school. Yet, even with the removal of the legal barriers, a climate of “sponsored discrimination” continued through the 1960s and 1970s against the Chicanas/Chicanos and African-American law school students as they were assigned to segregated housing and excluded from law school organizations (Lauer, 1996, p. 123–124).

Additionally, there were other publicized incidents of historical racial discrimination at predominantly white universities, ranging from former Gov. George Wallace’s attempt to block the first black students admitted to the University of Alabama to the shooting of Medgar Evers when he tried to enroll in the University of Mississippi during the civil rights era. More recently, Feagin’s (1992) interviews with African-American students have illustrated the continuing presence of racism on predominantly white campuses. Some, for example, have reporting having “confederate flags slapped in their faces and called niggers by white fraternities during parades while authorities did nothing” (p. 550). These racial incidents were treated with indifference or even hostile reactions by campus police and administrators.

In fact, as the *Hopwood* decision calls for African-American and Chicano/Chicana students to be viewed as individuals, Feagin’s interviews revealed that white faculty still view minority students in stereotypical group terms. An African-American graduate student reflected on her observations and encounters with a prominent department chairperson on a predominantly white campus. The chair made assumptions about race and a black undergraduate in the department who was doing research on black–white achievement:

Apparently, she assumed that this one undergraduate somehow spoke for all Black people. And this professor would ask her things like, “Well, I don’t know what you people want. First you want to be called Negro, then you want to be called Black. Now you want to be called African American. What do you people want anyway? And why don’t Black people show up in class more? Why is that I can’t get enough Blacks to sit on my classes?” So every now and then that sort of racist mentality comes out. (Feagin, 1992, p. 556)

These interviews revealed patterns of the barriers in the white campus world that African-American students face from students, faculty, and staff. The hostile or discriminatory actions ranged from aggression to exclusion, dismissal, or typecasting. Feagin (1992) posited that when all of the patterns from the interviews and reflections were analyzed, they revealed a process and culture of “cumulative discrimination” (p. 575). This type of racism manifests itself as blatant or subtle actions and has a severely oppressive and cumulative effect on these students. From a critical race theory perspective, this “cumulative discrimination” can be traced back to the history of

institutional racism in the academy and the ways it has a significant impact on present-day racism and its manifestations.

Therefore, the initial decreases in minority interest and attendance at the University of Texas law school and other public universities in California after Prop. 209 should not be surprising.⁷ For example, the number of Latino students accepted to all graduate programs at the University of California-Berkeley fell from 246 in 1996 to 180 in 1997 (Burdman, 1997, p. A1). Also, only one of the 17 Black students admitted actually planned to attend the UC-Berkeley law school (Appelbome, 1997b). A critical race theory analysis thus points out the problems (and their effects, such as decreased enrollment) with the legality of the “color-blind” admissions process, particularly as race now looms even larger on predominantly white colleges and universities since Chicano/Chicana and African-American students do not see these campuses as a welcoming environment for them. Furthermore, to obtain an education at the more elite universities, racial minority students must overcome the vestiges of discrimination that appear in the current campus environment of color-blindness.

Borrowing from Delgado (1989), CRT serves an important role through its use of the storytelling and narratives of racially marginalized students on predominantly white campuses. These narratives comprise an integral part of historical and current testimonies and findings of fact in legal and political policy battles surrounding race in higher education. The Federal Courts and the White European American majority should be interested in these “stories” because, as Delgado asserts, it is only through listening that “one can acquire the ability to see the world through others eyes” (Delgado, 1989, p. 2439). Critical race theory exposes the color-blind position to the light. Through narratives and other historical evidence, it documents minority student exclusion and the ways some have had to compromise their race to survive at predominantly white colleges and universities. Furthermore, CRT offers avenues for a different thinking about affirmative action, a thinking that challenges the “one-size that fits all” notion of merit in admissions and faculty hires (Sturm & Guinier, 1996, p. 957). Instead, more complex and innovative approaches that emphasize assessments through educational experiences are necessary to enhance affirmative action and expand the diversity mission of most educational institutions.⁸

“Race is ... race ain’t”: can CRT answer this question?

The nexus of critical race theory from the legal arena, and qualitative research methods and methodologies in education, provides a framework to understand the centrality of racism in school and university settings. The narratives generated from qualitative research serve as a powerful link between historical vestiges of past racism and the effects of what the color-blind perspective omits with its present-day orientation. To be sure, legal criticisms have dismissed the use of narrative and storytelling in CRT, positing that stories about racism are unreliable, unverifiable. This has been a particularly poignant criticism of legal scholars (Farber & Sherry, 1993, 1994) who have had problems with the lack of objective measures of evidence. They have also questioned the factual objectivity of the personal accounts of racism and fictional stories about racial dilemmas in the USA presented by CRT scholars such as Patricia Williams (1991, 1995) or Derrick Bell (1987, 1992).

However, Di Toro commented (in her review of Williams, 1995) that the subjective narrative authority and personal voice of an African-American professional woman

who has experienced racism forces readers to question their own subject positions as opposed to the authority of empirical evidence:

As readers, we are asked to grant Williams absolute authority over her personal experience, and to acknowledge our own participation in making that experience sometimes excruciatingly difficult for her... engaging with Williams in this way can raise a potentially debilitating personal dilemma: If we are white, we want neither to disbelieve her nor presume to sanction her story from a position of white privilege. The former leaves the reader in a position of racist skepticism towards a black narrator; the latter may have equally oppressing effects: When the white reader believes, she may be positioning herself as a 'legitimator' of the black narrator. (Di Toro, 1996, p. 1469)

The use of narrative in critical race theory adds to the racial dimension and purpose of qualitative inquiry and ethnographic research in education. Previously, Stanfield (1993, 1994) and Foster (1994) noted the controversy surrounding how qualitative research has presented various aspects of black life and the African-American community. The processes used to engage in this description has been fraught with problems. They have ranged from subject exploitation and misuse of power by researchers to a general failure of critical self-questioning and the problematic nature of university status and privilege. However, CRT and qualitative research in education both utilize personal narratives (of the self and others) that can also use fiction or performance-based texts (Denzin, 1997), to illustrate, from a critical position, the historical and current connections and effects of racial issues and concerns. Since the analysis of race is at the center of CRT, then qualitative researchers can provide myriad ways to reconceptualize and challenge racial policies and their images and patterns of representation. Not only can this be done through more conventional means of qualitative research, but also through the use of various forms of political artistic expressions and literary presentations of "racial data" that challenge the social constructions of racial experiences and the way they are presented in the larger society (White & Bonner, 1997).⁹

The legal narratives of racism and racial discrimination can serve to challenge the prevailing notion of race neutrality in educational institutions. The thick descriptions of sites (e.g., conducting and analyzing interviews and long-term participant-observations) that are characteristic of educational anthropology (Wolcott, 1994) not only serve an illuminative purpose, but can also be used to document overt and institutional racism. Deyhle's (1995) ten-year ongoing relationships and work with the Navajos in southern Utah and northern Arizona has resulted in research that fully describes how racism plays out in the larger community between Anglos and Navajos. This racism was central to analyzing relations between Anglos and Navajos. Racism was reflected in the conflicts over power regarding Navajo self-determination in education versus Anglo teachers' and administrators' control of school policies. Her work also documents the Navajo community's legal attempts to maintain cultural integrity and fight for equitable remedies in the Federal courts to address racial discrimination pertaining to tracking, high suspension-expulsion rates, and inequitable funding of schools.

The importance that critical race theory places on historical links to contemporary social constructions of race also has implications for qualitative studies in schools and colleges. This can be pursued through an examination of the vestiges and representations of the ideology of color-blindness in educational institutions. For example, *Hopwood's*

reliance on individual merit and the irrelevance of race is similar to the rhetoric of individual success and color-blindness among white teachers that Lipman (1977) found in her study of school restructuring. An area for future research linking qualitative studies to critical race theory may, thus, involve tracing how the racial ideology of color-blindness plays a role in shaping the experiences of African-American or Latino-Latina students from the high schools to the postsecondary education level. Since the current political climate and legal positions dictate that schools and colleges should be race-neutral in a meritocratic society, then critical race theory and qualitative research in education can provide racial counter-insights as a critique of this meritocracy. Furthermore, CRT and qualitative research can show how the ideology of race neutrality and “ethno-culturalism” (Diamond, 1996, p. 163) can take on various shapes and forms (e.g., Prop. 187 in California banning public services for illegal immigrants, English-only mandates, xenophobic attitudes, etc.). This in turn reinforces structural racism and fuels overt bigotry in schools and colleges over issues such as language, national origin, and immigration as shown in the documentary film “Fear and Learning at Hoover Elementary School” by Laura Símon (1977).

Finally, the theorizing about race from critical perspectives can attempt to connect to already ongoing daily realities and struggles about race and other areas of discrimination.¹⁰ For example, the talk I gave at the university in the opening narrative served, in hindsight, as an opportunity for students, faculty, and administrators to express their concerns about student diversity and single mothers, racism, sexism, homophobia, and the ways they played out on their institution. Previously at this campus, there had been a series of racial incidents between white European American and African-American students. These incidents also led to verbal and email attacks on lesbian and gay students as well. Although the racial harassment arose out of a black-white conflict, the subsequent discussion led to various groups voicing concerns about how the racial conflict triggered more open hostilities by some students toward other marginalized groups and how this resulted in a campus-wide climate of harassment and tension. The discussion which took place after the talk on CRT also centred on different ways to look at discrimination on campus. For example, some focussed on the historical establishment of the university as a source of the problem, while others discussed how these issues can lead to future teaching and action in areas related to diversity and social justice. The centering of student, faculty, and administrator narratives on race and other areas of difference can give rise to future connections between CRT and education, particularly if it stimulates or adds to ongoing efforts addressing educational diversity and social change.

Conclusion: CRT and connections and dilemmas for the future

The future of critical race theory and its place in education will partially depend on the efforts made by researchers and scholars to explore its possible connections to the racism in U.S. schools and communities of color (Tate, 1997). Qualitative research can also inform critical race theory as to how the ideology and resulting legal mandate of color-blindness in schools and universities further serve as racist barriers for students of color. Critical race theory can be a useful framework for studying whiteness, especially by students and scholars of color who study whites and issues related to white racism. The critiques of whiteness, power, and privilege (Fine, Weis, Powell, and Wang Mun Wong, 1997), also serves as a useful point of dialogue with some white European American

students and multiracial student groups who are trying to comb racism as well (Garza, 1997; Kelley, Schuwerk, Krishnamurthy, and Kao, 1997).

Still, my main dilemma is one posed in the opening narrative by the two students. Namely, how does critical race theory address their interest related to campus racism, homophobia, sexism, etc.? The talk and follow-up discussion at the pot-luck dinner serendipitously created a safe space that led to honest open-ended conversations on the broad implications of the campus's racial and homophobic incidents. Yet, I would have to agree with Jervis (1996) that, overall, schools and universities tend to ignore the most prominent matters related to race, culture, and ethnicity. Until now, for the most part, it has been the legal scholars in CRT who have placed racism at the center of the ideological discussion related to law, policy, and the social construction of race. Their borrowing of various methods from the social sciences and liberal arts demonstrate the effects of the vestiges of racism and present-day perspectives on race in the USA. I believe that qualitative researchers in education have added and will continue to add even more to the development of critical race theory and other initiatives that address racism in educational institutions, its disparate impact on students of color, and the ways they are striving for self-determination to obtain the equitable education they deserve.

Notes

1. The author would like to sincerely thank Frank Margonis and the QSE editorial group on this special issue for their helpful comments on this paper. Special acknowledgments are also given to my colleagues and associates at the university in the western USA where the opening narrative took place.
2. Questions and issues raised about epistemology, methodology, and ideology in race-based scholarship and education were initially raised by Marjorie Davis, Melanie Carter, and Cynthia Tyson at a seminar conducted by Patti Lather at Ohio State University, November 15, 1996.
3. In this paper, I will use African-Americans and blacks, whites and white European Americans, Chicano/Chicana, and Latino/Latina interchangeably, even though there are differences among these groups as well as distinctions among Asian-Americans and American Indians.
4. Nebeker (1997) made a similar claim to that of Ellsworth (1989) in her critique of critical pedagogy and empowerment in education. Nebeker argued that CRT may indeed provide a solid theoretical understanding of the complexity of race in the USA. However, that did not translate into how the theory could help empower the vast majority of students of color in the schools. Furthermore, she argued that CRT scholarship left little room for sympathetic whites who shared the ideals of CRT regarding emphasis on racial justice. However, I would propose that CRT is an emerging theoretical framework subject to change as it moves into education. Furthermore, CRT does have a place for white European Americans because it was partially built on the legal critique of whiteness and white privilege (Haney López, 1996) and the sudden emergence of white studies from a critical perspective.
5. Despite the fact that *Hopwood* only covers the states of the 5th Circuit (Texas, Mississippi, and Louisiana), some politicians and news commentators have argued for "need-based" or social-class-based affirmative action to replace race and gender. However, Feinberg (1996) has put forth strong social and philosophical arguments against such policies as replacements for gender and race.
6. Critical race theory comes more out of the legal and sociopolitical criticism, and it may not add to the discussions related to race and research epistemologies. However, CRT can be used as a vehicle to open the conversation about race-based research epistemologies, such as black feminist thought (Collins, 1991) and Africana studies (Asante, 1997; Kershaw, 1992). Some of the calls for race-based epistemological work (Stanfield, 1994) will also be useful to illustrate how racial minorities act as individuals and/or act as collective communities to resist the notion of color-blindness and attempt to foster success for their students. These issues for African-American education have been discussed in important works edited by Lomotey (1992) and Shujaa (1994; 1996).
7. One student, Bruce Rideaux, who is a senior at the University of Texas now, said he would not consider going to the Austin campus if he were applying to college now, "there are 50,000 students here and so few of them are black, with all this going on, I probably would have gone to a black or smaller university" (Applebome, 1997a, p. C24). Malcolm Laverne, who was the first African-American to send in a tuition deposit to attend the University of Texas law school, later changed his mind because after *Hopwood*, "it would be like going to a country club there" (Applebome, 1997c, p. A10). There is some speculation that the drop

in interest and enrollment is due to higher admissions standards after Hopwood and Prop. 209. However, this just highlights racism and the apparent return to the Jim Crow era except that now merit through grades test scores, and “other forms of diversity” form the basis of how one gets into the elite universities. As Sturm and Guinier (1996) have pointed out, this type of meritocracy merely exacerbates racial, social class, and gender discrimination in higher education admissions.

8. Sturm and Guinier (1996) argue that the current emphasis on standardized testing to determine entrance into law schools, graduate schools, etc., constricts opportunities for women and minorities to participate fully in U.S. society since political, social, and economic status and influence are directly determined by the gatekeeping function of the test and the institutional acceptance of the questionable validity of these tests. Sturm and Guinier also assert that the battle should really be over how affirmative action can truly lead to a more equitable and just society as opposed to a narrow battle over numbers of minorities and reverse discrimination in an institution.

9. In this presentation, White and Bonner used poetry, video, rap music and other creative forms of expression to draw from their own epistemologies of color as African-Americans, and they in turn also explored how different methodologies and methods can be used to address race, gender, and other aspects of diversity in the urban education context.

10. CRT can provide a theory about race with respect to the seemingly intractable nature of the black-white conflict as well as the emergence of race, culture, and language regarding other groups. A CRT perspective can provide insights as to how Asian-Americans are sometimes viewed as “honorary whites” for political purposes in the affirmative action debate, yet have been discriminated against in higher education admissions (Tagaki, 1992). However, more work is needed to explore how critical race theory can or cannot be used in the international education context when one considers the central questions of transnationalism, diaspora, postcolonialism (Chow, 1993; Fanon, 1967; Gilroy, 1993).

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