

The Impact of Plessy versus Ferguson on Black Education

The Supreme Court ruling of Plessy versus Ferguson hindered an already unequal system of pedagogy between Black and white students. Despite the court's decision having nothing to do with instruction, the ramifications of the monumental case drastically impacted education. It ensured Blacks a systemic denial of equal and equitable educational opportunities (Jones, Winter 1978). In simpler terms, it made the unofficial policy of subpar education for Blacks official. *"Although Plessy mandated public policy of 'separate but equal' the 'equal' provision was conveniently and uniformly ignored by educational and public officials, with no sanctions or punitive measures forthcoming against them for doing so (Jones, Winter 1978, pg. 4)."*

The attributes of *"separate but equal"* in education often differed depending on the region. School sessions for Black students in the South were generally shorter than for white students. In rural areas, Black students operated under split-session arrangements, where they were let out of school for harvesting crops (Jones, Winter 1978). Nationally, Black students attended buildings that were deteriorating or dilapidated. The textbooks from which they studied were often worn or missing pages. Black teachers were paid proportionately less than their white counterparts and tax expenditures for Black schools were kept to a minimum (Jones, Winter 1978). The logic for this was to keep as much of the tax base as possible for the education of white students.

The Inequity of Missouri's Black Schools

Missouri was no different in its pedagogical mentality. In 1911, Black students operated with a school property value of \$465,565.00 compared to \$5,792,468.00 allotted to white students (Williams, 1920): This is today's financial equivalent of \$14.7 million to \$182 million (CPI Inflation Calculator, 2023). Despite these and other hindrances, some Black schools often developed reputations for excellence (Jones, Winter 1978). This was the case for several Black institutions in two of Missouri's biggest cities. Lincoln High School in Kansas City, now Lincoln College Preparatory Academy, was one such school. Until desegregation, it was the only post-elementary school for Blacks in Jackson, or the surrounding Clay and Platte counties (Hogan & Kniggendorf, 2020) (Gotham, Summer 2002). By 1929, school districts were no longer compelled to operate public schools for Black students, even if there were sufficient numbers to provide one (Dennis, n.d.). In prior years, districts only needed to establish a school if 15 or more Black students resided within its borders (Missouri, November 1927). Many counties reportedly did not have enough Blacks to form a school. In instances like these, Black children did not receive any public formal instruction (Dennis, n.d.).

Since many rural Blacks were moving to the city, their education was mostly seen as an urban problem (Williams, 1920). By 1910, 33,465 of Missouri's 42,764 school-aged Black children lived in cities. Of the 29,562 who attended school, 21,694 were enrolled in urban domains, with only 7,868 enrolled in rural domains. Another interesting thing to note, *"During this era school districts in only six of the sixty-one African-American settlements in Jackson, Clay, and Platte Counties provided elementary schools for African American children, creating pressures for parents either to move to areas where schools were located or make their children travel long distance to schools (Gotham, Summer 2002, pg. 11)."*

It is somewhat ironic racism and inequality played into Lincoln High School developing its reputation as a center of academic excellence. As Roy Wilkins, a reporter for the Kansas City Call noted, *"The black schools [in Kansas City] were much better than they had any right to be, partly because they were full of talented teachers who would have been teaching in college had they been white, and partly because Negro parents and children simply refused to be licked by segregation (Dennis, n.d.)."* Black students on the other side of the state fared a little better. Because of the larger number of Blacks and shifting demographics of the population, it had three High Schools for African Americans by the time of Brown versus Board of Topeka: Sumner High School, Booker T. Washington Technical High School, and Vashon High School. The where the latter once resided is now the campus of Harris Stowe State University, an HBCU (Naffziger, 2018). Sumner's students excelled, in part, because many of the Black educators who worked there either had Ph. D.'s, were lauded scholars in their fields, or were celebrated scientists (Naffziger, 2018).

While it did have three secondary schools for Blacks, the educational appropriations and facilities were far from equal to those of whites. An obvious illustration of this was in 1908 when the St. Louis school board agreed to give \$650,000 to build a new white high school, but only \$313,000 to build the "new" Sumner High School on Cottage Avenue in the Ville neighborhood (Adams, 2014). Despite being built for half the price of the white high school, the new Sumner High School was recognized as the most advanced in the nation for African American students during this era (Schools, 1911). Yet, a question must be asked. If the new Sumner High School, built at half the cost of a white high school, was the most modern Black secondary school in the country, what does this say about the state of other public Black schools in Missouri during this time? There was nothing provocative about the new school. It simply had what other white high schools had during that time, which included science labs, a library, a cafeteria, and a gymnasium (Schools, 1911).

The per-pupil costs of white and Black students differed. In 1911, white students had an average pupil cost of \$42.20, while the average per pupil cost for Black students was \$35.02 (Williams, 1920) The teacher ratio for white students was 1:37, and for Black students, it was 1:42 (Williams, 1920). Though the Missouri Superintendent of Public schools rated Lincoln and Sumner as first-class schools in 1916 (Schools M. S., 1916), ratings for other Black public schools in the state did not fare as well. *"The Negro high schools of Hannibal and of Springfield are ranked second class and the high schools of Chillicothe and St. Joseph are rated third class. The other nine high schools are unclassified (Williams, 1920, pg. 162)."* Later assessments of Black schools in Missouri were worse. The Missouri Education Commissioner in 1929 reported the schools, if they could be called that, were absent of educational opportunities and were open on average for about six months. Teachers were usually novices who were young, with barely any education above high school (Gotham, Summer 2002).

The Fallout of Brown versus Education Board of Topeka

When the Supreme Court ruled on Brown versus the Board of Education of Topeka, et al, May 17, 1954, it was a culmination of four class-action suits brought to court in place of Black students because of mandated segregation (Russo, Harris, and Sandidge, 1994). It was named Brown because the lead case had been filed in Topeka, Kansas. Though monumental, the ruling presented no solution to the initial problem. It would take three additional follow-

up cases, all known as Brown II, Brown III, and Brown IV, for the Supreme Court to offer guidance in rectifying the inequalities and inequities of de jure segregation (Russo, Harris, and Sandidge, 1994). Perhaps this is one reason why, a decade later after the ruling, only three percent of segregated schools had desegregated (Rights, 1971). The move to comply with Brown did not begin until the government tied federal funds to public schools (Jones, 1978). In 1964, congress passed Title VI of the Civil Rights Act which stipulated school districts that did not desegregate were in danger of losing federal aid, in addition to having other fines and penalties levied against them. From 1964 through 1969, compliance with desegregation in public schools increased by 30% - 40% (Jones, 1978). However, numerous negative social and political ramifications resulted from the case.

Rather than send their children to schools with Blacks, some white parents refused to send their children to school. Also, the number of white private schools increased (Jones, 1978). In some extreme instances, whole school districts were shut down, rather than admit Black students into segregated schools (Branton, 1983). Blacks in Prince Edward County, Virginia, did not go to school from 1959 to 1964 (Smith-Richardson & Smith, 2021). In other situations, federal troops had to be called in to protect Black children from white mobs (Branton, 1983). The next push-pull factor found white flight and the movement away from Blacks to the suburbs, which helped to destroy some school tax bases. Another casualty of desegregation was the number of Black educators, particularly Black administrators, who found themselves unemployed since white parents did not want anyone who was Black teaching their children (Fairclough, 2004) (Haney, 1978). Darla Buchanan, a Black teacher in Topeka, Kansas, received a letter from the superintendent one year before Brown, in 1953, stating, “[T]he majority of people in Topeka will not want to employ Negro teachers next year for white children. It is necessary for me to notify you not that your services will not be needed for next year (Will, 2019).” Before Brown, almost 50% of Black professionals were school teachers. Presently, Blacks only represent 8% of the teacher workforce (Madkins, 2011).

Even some Black teachers who were allowed to teach in integrated schools found themselves reseggregated, teaching Black students in all-black classes while their white colleagues taught white students in all-white classes (Madkins, 2011). These factors and more forced government intervention (Berne, Fall 1988). *“Before the federal government accepted a role in K-12 education, schools in white areas had no obligation to admit African American students or anyone else who was ‘different’ (Hill, 2000, pg. 12).”* Brown was the impetus for all major federal programs directed toward elementary and secondary education to right the wrongs of segregation and inequality (Hill, 2000). The Supreme Court’s involvement surrounding the issue spanned four periods, 1954 –1964, 1965 – 1979, 1980 – 1989, and the early 1990’s (Russo, Harris, & Sandidge, Summer 1994).

School Funding Post Brown

One central issue in desegregation was school funding. Before Brown, the equality of *“separate, but equal”* for Blacks had never been achieved, nor had it ever been challenged (Jones, Winter 1978). Segregated funding had been maintained in a myriad of states. *“Some had used ‘racially distinct tax’ policies that reserved separate funds for white and Black schools. Other states had moved school funding responsibility and control from state officials to local communities. Local officials could then ensure inequality without any specific law mandating it (Black & Crolley, 2022).”*

To ensure equality and equity in education, school finance litigation remained an integral part of Brown (Liu, 2006). One of the first cases surrounding finance litigation was in 1971, *Serrano v Priest* (Russo C., 1999). *"The plaintiffs alleged that the California school funding system was unconstitutional because it created wide disparities in the quality and availability of resources and educational opportunities across the state (Russo C., 1999, pg. 48)."* In 1976, in *Serrano II*, the United States Supreme Court overrode the California Supreme Court by declaring the school funding increase in *Serrano I* had been insufficient (Russo C., 1999). The state legislature responded by passing a funding formula tied more to revenue sources from the state. In 1973, however, the Supreme Court, in *San Antonio School District v. Rodriguez*, found no violation of the Fourteenth Amendment's Equal Protection clause. The plaintiffs had alleged Texas' school finance system disadvantaged poorer students in the district (Landmark US Cases Related to Equality of Opportunity in K-12 Education, n.d.). One of the main reasons for the court's rejection was the belief it was paramount for school funding to remain in local control. (Black & Crolley, 2022). Black and Crolley (2022) state, in the case of *San Antonio Independent School District v. Rodriguez*, the Supreme Court *"...put a preference on local funding over remedying inequality (Black & Crolley, 2022)."*

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