

2020-2021

Grayscale Thoughts: Reactions to *Brown v. Board of Education*

Haylee Orłowski

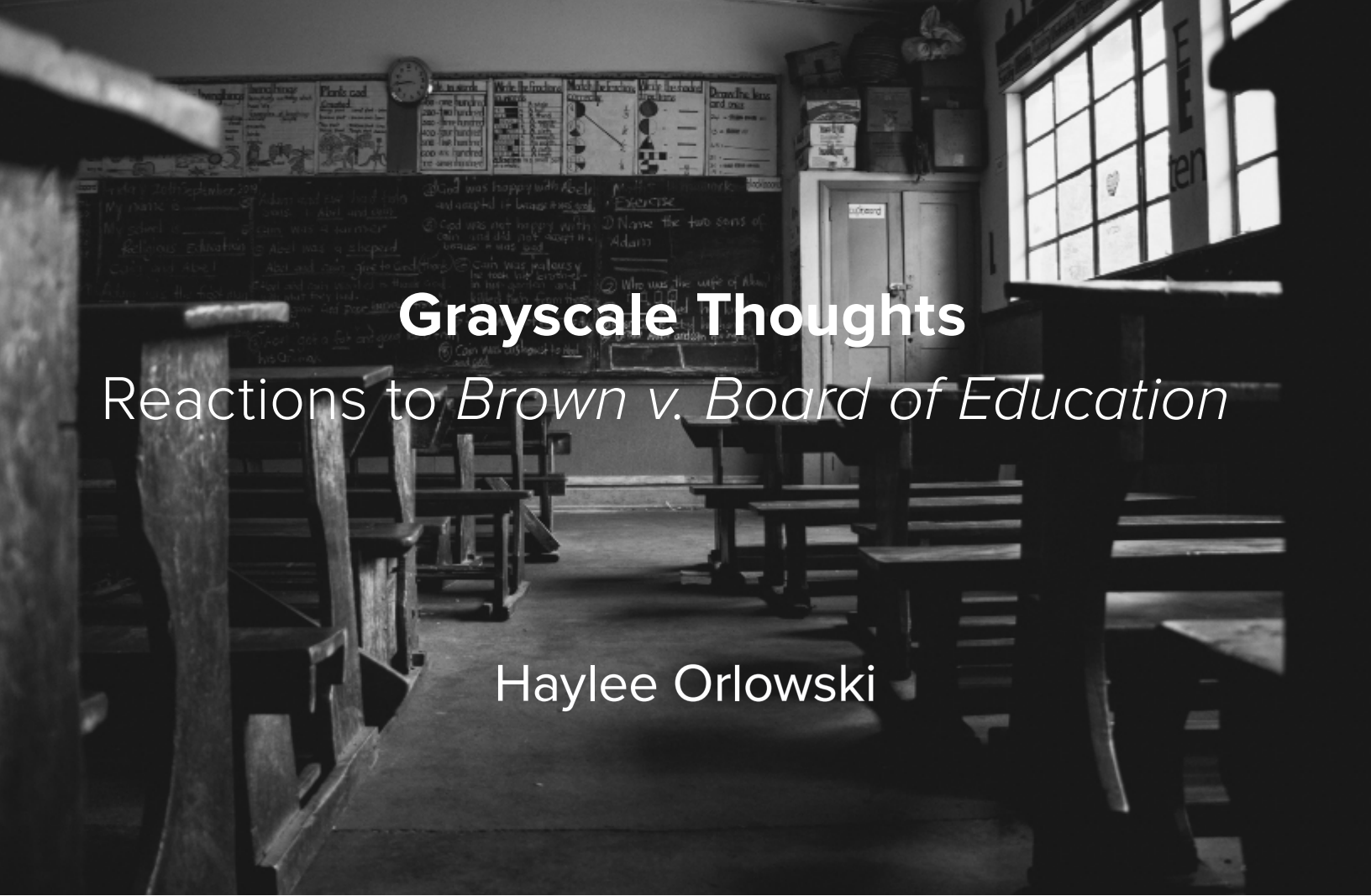
James Madison University

Follow this and other works at: <http://commons.lib.jmu.edu/jmurj>

Recommended Chicago Citation

Haylee Orłowski. "Grayscale Thoughts: Reactions to *Brown v. Board of Education*." *James Madison Undergraduate Research Journal* 8, no. 1 (2021): 63-73. <http://commons.lib.jmu.edu/jmurj/vol8/iss1/7>.

This full issue is brought to you for free and open access by JMU Scholarly Commons. It has been accepted for inclusion in *James Madison Undergraduate Research Journal* by an authorized administrator of JMU Scholarly Commons. For more information, please contact dc_admin@jmu.edu.



Grayscale Thoughts

Reactions to *Brown v. Board of Education*

Haylee Orlowski

Photo by Mwesigwa Joel on Unsplash.

Abstract

The 1954 Supreme Court case *Brown v. Board of Education* established that the segregation of public schools based on race violated the Equal Protection Clause of the Fourteenth Amendment. Across the United States, there was a spectrum of reactions to *Brown*. Responses ranged from optimism and celebration to anger and violence. This paper surveys the varied reception of *Brown* from politicians, parents, teachers, journalists, and other parties. It acknowledges the grayscale of opinions within and across demographic lines. The purpose of this paper is to recognize the complexity of a critical moment in the civil rights movement to prevent the oversimplification of American history.

The landmark 1954 Supreme Court case *Brown v. Board of Education* did not simply reverse the precedent of “separate but equal” concerning school segregation; it turned the infrastructure of society on its head. The *Brown* decision was a civil rights triumph, but implementation created political tension and dissent across the nation. School desegregation efforts that followed in the first years after the decision were met with aggressive resistance from Southern states. Officials demonstrated their disdain for the federal order through both public political defiance and personal statements. With no clear plan or support from the federal government in its formative years, *Brown* led to uncertainty and strong initial reactions from individuals.

The Brown decision was a civil rights triumph, but implementation created political tension and dissent across the nation.

Often oversimplified into camps of “for” or “against” along racial divides, reactions to the *Brown* decision were more complex. Feelings varied on the individual level, with both African American and white individuals abandoning the dominant sentiments of their demographic in regard to *Brown* and school integration. This paper surveys contemporary newspaper editorials, opinion pieces, letters, and articles, along with more recent scholarship and reflections, to represent the broad range of responses that *Brown* elicited. Evaluating *Brown* from multiple perspectives prevents the oversimplification of American history.¹

“Separate but Equal”

In response to the Reconstruction era after the Civil War, Southerners sought to create an infrastructure

that suppressed the rights of African Americans in their region. The statutes and de facto racism set in place during this period only continued to expand over the course of the early twentieth century, particularly after the Supreme Court case *Plessy v. Ferguson* (1896) ruled that “separate but equal” was constitutional. As a result, segregation and Jim Crow laws permeated Southern American culture. The government approved of separating Americans based on their skin color, as long as each group was provided “equal” access to spaces and resources. This “separate but equal” decision enabled racism and segregation without constraint, from separate drinking fountains and local transportation to public schools and movie theaters.²

Following the end of World War II in 1945, African Americans began to call more adamantly for their rights and equal treatment by their state and federal governments. African American soldiers came home from serving on the front lines of the global war and, alongside civilians, expressed their aversion to the mistreatment they experienced in their hometowns. Vocalization against a discriminatory system so deep-rooted in the hearts of many white Southerners created incredibly contentious environments within Southern states. This tension between the two largest groups in the region led to both civil and violent conflicts as African Americans fought to be treated as equal to their white neighbors.³

Through court cases in Delaware, Kansas, South Carolina, Virginia, and Washington, DC, during the 1940s and early 1950s, the NAACP fought for equality within segregated higher education.

African American activist organizations, such as the National Association for the Advancement of Colored People (NAACP), and various grassroots groups worked to counter racism on both state and national levels through the judicial system. One of the most evident forms of mistreatment and disadvantage was the inequality of public schools. Through court cases in Delaware, Kansas, South Carolina, Virginia, and Washington, DC, during the 1940s and early 1950s, the NAACP fought for equality within segregated higher education, such as law schools. Though the specifics of these “equalization suits” varied—some aimed for full integration of African American and white students (Delaware), while others aimed to secure better African American schools which were equal in resources

¹ For a good overview of the civil rights movement, see Frederic O. Sargent, *The Civil Rights Revolution: Events and Leaders, 1955-1968* (Jefferson, NC: McFarland, 2004), and Michael Ezra and Peter C. Mancall, *Civil Rights Movement: People and Perspectives* (Santa Barbara, CA: ABC-CLIO, 2009). To read more on the court case *Brown v. Board of Education*, consult Diane Telgen, *Defining Moments: Brown v. Board of Education* (Detroit, MI: Omnigraphics, 2005); J. Harvie Wilkinson III, *From “Brown” to “Bakke”: The Supreme Court and School Integration, 1954-1978* (New York: Oxford University Press, 1979); Lynn W. Zimmerman, “Reflections on *Brown*,” *American Educational History Journal* 33, no. 2 (2006): 89-96, Education Research Complete; Raphael Cassimere Jr., “Remembering *Brown v. Board of Education*,” *The Crisis* 101, no. 4 (1994): 10, 17-18, Education Research Complete; and Richard Kluger, *Simple Justice: The History of “Brown v. Board of Education” and Black America’s Struggle for Equality* (New York: Alfred A. Knopf, 1976). For further information on Massive Resistance, refer to Francis M. Wilhoit, *The Politics of Massive Resistance* (New York: George Braziller Inc., 1973) and Numan V. Bartley, *The Rise of Massive Resistance: Race and Politics in the South During the 1950’s* (Baton Rouge: Louisiana State University Press, 1969). For additional readings on Southern responses to this decision, see R. Ray McCain, “Reactions to the United States Supreme Court Segregation Decision of 1954,” *The Georgia Historical Quarterly* 52, no. 4 (1968): 371-87, www.jstor.org/stable/40578897; James J. Kilpatrick, *The Southern Case for School Segregation* (New York: Crowell-Collier Press, 1962); and Angie Maxwell, *The Indicted South: Public Criticism, Southern Inferiority, and the Politics of Whiteness* (Chapel Hill: The University of North Carolina Press, 2014). Finally, for a better understanding of contemporary sentiments regarding the case and its decision, refer to “Text of 96 Congressmen’s Declaration on Integration,” *New York Times*, March 12, 1956, Proquest, and *Brown v. Board of Education*, 347 U.S. 483 (1954), for the primary legal material of the case and decision.

² Waldo E. Martin Jr., *“Brown v. Board of Education”: A Brief History with Documents* (Boston: Bedford/St. Martin’s, 1998), 76-80.

³ Kluger, *Simple Justice*, 224-227.

and facilities to white schools (Virginia and South Carolina)—all five cases sought school equality. Each case was unsuccessful in the lower courts, and was appealed to the U.S. Supreme Court. Since these cases did not achieve the change African American activist groups wanted, Baltimore lawyer Thurgood Marshall compiled extensive evidence from each case to fight segregation in public education. Marshall, the NAACP’s chief lawyer since 1938, had detailed where to bring up the initial suits, what schools should be desegregated, and who to file each suit against so that the case would be its strongest when addressed by the federal judiciary.⁴

Legal Integration

Brown v. Board of Education first reached the Supreme Court in 1952, only two years after Marshall convinced the NAACP to challenge institutional segregation in public education. The *Brown* case brought a compilation of the five different cases about school segregation before the Supreme Court. All five cases shared the same argument: the “separate but equal” doctrine in *Plessy v. Ferguson* violated the Equal Protection Clause of the Fourteenth Amendment. Initially, the case was sent back and forth between the state courts and Supreme Court, which made acquiring a court hearing a lengthy process. After much deliberation, the Supreme Court decided on June 9, 1952, that it would hear the five school segregation cases. The Court combined the cases into one trial set to begin in October 1952, which was later postponed to December to be heard with other school cases.⁵

All five cases shared the same argument: the “separate but equal” doctrine in *Plessy v. Ferguson* violated the Equal Protection Clause of the Fourteenth Amendment.

The case was delivered with two distinct sides: pro-integration on the part of Thurgood Marshall and the NAACP versus anti-integration on the part of South Carolinian attorney John Davis. Marshall and the NAACP accused “separate but equal” of violating individual rights based on the Fourteenth Amendment, while Davis claimed schools separated by race served the needs of ill-educated African Americans and that the social experiment of integration would disadvantage these students rather than benefit them. After the *Brown* case hearing ended, the Supreme Court Justices deliberated throughout 1953. Newly appointed Chief

Justice Earl Warren advanced his strong convictions in the deliberations that “separate but equal” created de jure inferiority of African Americans and was therefore unconstitutional.⁶

Following many conferences regarding the case, the Supreme Court released their decision on May 17, 1954. Warren delivered the unanimous opinion. The opinion was brief given the complexity and significance of the case. Warren highlighted the importance of education to the development of every individual, and the nation holistically, by providing equal opportunity. He argued “to separate them [African American students] from others of similar age and qualifications solely because of their race generates a feeling of inferiority.”⁷ The Supreme Court called for the disbanding of the “separate but equal” doctrine in public education due to its violation of the Fourteenth Amendment’s Equal Protection Clause. Desegregation was to begin in all state public education systems. Implementing this decision would fundamentally alter the infrastructure of school systems in over half of the United States, including the District of Columbia.

Initial Optimism

The implementation of *Brown* was seen as the beginning of movement toward equal rights for all citizens. African American newspapers emphasized the popular sentiments of enthusiasm and hope in the weeks following the Court’s decision. In the *Pittsburgh Courier*, editorialist George S. Schuyler wrote, “The whole atmosphere for acceptance of such a decision as the Supreme Court handed down the other day was slowly being created in the Jim-Crow areas. If it hadn’t existed, the Court would not have rendered the decision it did.”⁸ Schuyler had been criticized for voicing this belief prior to the *Brown* decision but was still not surprised by the outcome. Other national leaders were quoted in the same May 29 issue of the *Courier* with positive views regarding *Brown*. The National Association of Colored Women (NACW) president, Irene McCoy Haines, declared the decision to be “the greatest judicial finding in favor of the welfare of the Negro groups since the passage of the Thirteenth, Fourteenth, and Fifteenth Amendments.”⁹ Hopeful and confident testimonies, such as these, were abundant in African American newspapers.

⁶ Kluger, *Simple Justice*, 541; Juan Williams, “Thurgood Marshall and *Brown v. Board of Ed.*,” *Morning Edition*, National Public Radio, December 8, 2003, <https://www.npr.org/2003/12/08/thurgood-marshall-and-brown-v-board-of-ed>; Patterson, “*Brown v. Board of Education*,” 64.

⁷ *Brown v. Board of Education*, 347 U.S. 483, 494 (1954).

⁸ George S. Schuyler, “High Court Decision Was No Surprise to Him,” opinion, *Pittsburgh Courier*, May 29, 1954.

⁹ “Nat’l Leaders Laud Ban on School Segregation: Supreme Court’s Decision Called ‘Long Over Due,’” *Pittsburgh Courier*, May 29, 1954.

⁴ Wilkinson III, *From “Brown” to “Bakke,”* 27.

⁵ James T. Patterson, “*Brown v. Board of Education*: A Civil Rights Milestone and Its Troubled Legacy” (New York: Oxford University Press, 2001), 21, 27; Kluger, *Simple Justice*, 540.

They articulated the popular opinion amongst the community, while also working to convince those who were wary about *Brown's* impact on the nation.

Thurgood Marshall enforced these hopeful sentiments. When asked about *Brown* after his legal victory, Marshall often expressed how implementation was inevitable and would likely be swift, no matter the region. One October article from *The Washington Post and Times Herald* best displays Marshall's optimism about the future of school integration: "If they can desegregate schools in Baltimore, they can desegregate schools anywhere, including Biloxi, [Mississippi]."¹⁰

A month later in the same newspaper, Marshall responded to news that Southern states were moving to establish private schools: "I don't believe people would be able to abolish school systems they have spent 70 or 80 years building up."¹¹ Marshall was certain these Southern threats to establish private schools were empty and believed that people would not go through unnecessary trouble to evade the inevitability of integration. Marshall's initial confidence in public school integration's success was unwavering, but he did not realize the defiance *Brown* would face in the coming years.

The NAACP realized that legal success did not translate to triumph over the larger issue of racism that plagued American society.

The initial elation expressed by Marshall, the NAACP, and African American newspapers waned as they evaluated the logistics of this legal decision. In the first month following the *Brown* decision, the NAACP realized that legal success did not translate to triumph over the larger issue of racism that plagued American society. The June-July issue of their magazine, *The Crisis*, was dedicated almost entirely to *Brown* and expressed this awareness. In the editorial section of the issue, one author wrote, "We also feel it necessary to temper our exultation with the warning that this is a major battle won, not a campaign concluded." They added that having "unintelligent optimism and childish faith in a court decision can blind us to the fact that legal abolition of segregation is not the final solution for the social cancer of racism."¹² This editorial communicated the NAACP's optimism, but also acknowledged the fight

for equality being far from over. They recognized the opposition from Southerners who believed their state rights and cultural customs were threatened by *Brown*, but nonetheless planned to continue their pursuit of school integration across the United States.

Compliance with Integration

Many states believed in the inevitability of this court decision and agreed to implement integration as outlined in *Brown*. As Missouri State Attorney General John Montgomery Dalton put forth in a ten-page statement a month after the *Brown* decision: "It is the opinion of this office that the provisions of the Missouri Constitution and Statutes relating to separate schools 'for white children and colored children' are superseded by the decision of the Supreme Court of the United States and are, therefore, unenforceable." With this statement, Dalton confirmed the plan of Missouri, a border state, to move forward with integration, a position that contrasted from the Deep South.¹³

Accordingly, the majority of communities in Missouri planned to integrate their schools by September 1955. The reason for this pro-integration stance was because state officials saw benefits in the desegregation ruling. Funding the dual education system was a financial burden on the state and abolishing the system would considerably relieve the state budget. The closing of segregated schools was not perfect though. As part of the cost savings, Missouri reduced the number of teaching positions throughout the state. In Moberly, Missouri, fifteen teaching contracts were not renewed, with eleven African Americans denied their positions. This case displayed how inequality was a deeper-rooted and more widespread issue in America than the general population was led to believe.¹⁴

Despite common anti-integration sentiments, some Southern and border state officials admitted to the decision's inevitability and spoke in favor of gradual implementation beginning at the local level. One such person was distinguished Richmond attorney and Pulitzer Prize winner, David John Mays, who detailed in his personal diary: "I am satisfied of the following: (1) integration is certain to come; (2) Virginia people will sacrifice their public school system, even today, to prevent integration; and (3) ultimately we must cushion the impact of integration at the local level, although under general statutes." Mays's concession showed how

¹⁰ "NAACP Encouraged, Virginians Are Told," *Washington Post and Times Herald* (1954-1959), October 12, 1954, Proquest.

¹¹ "Integration Foes Seen Facing Suit," *Washington Post and Times Herald* (1954-1959), November 29, 1954, Proquest.

¹² "Segregation Decision," editorial, *The Crisis*, June-July 1954, 352, https://books.google.com/books?id=9VcEAAAAMBAJ&printsec=frontcover&source=gbs_ge_summary_r&cad=0#v=onepage&q&f=false.

¹³ Peter William Moran, "Border State Ebb and Flow: School Desegregation in Missouri, 1954-1999," in *With All Deliberate Speed: Implementing "Brown v. Board of Education"*, eds. Brian J. Daugherty and Charles C Bolton (Fayetteville, University of Arkansas Press), 179, <https://doi.org/10.2307/j.ctt1ffjdp.12>.

¹⁴ Moran, "Border State Ebb and Flow," 180.

not all white Southerners were aggressively fighting for segregation.¹⁵

Intellectuals, newspaper editors, and ordinary citizens also voiced their views. One writer and social critic, Lillian Smith of Georgia, wrote to *The New York Times*: “Then why are a few politicians protesting so angrily? Perhaps because they feel they will now be handicapped if the old crutch of ‘race’ is snatched away from them.”¹⁶ She expressed the resentment small pockets of Southerners felt toward those who wanted to defy the federal government and perpetrate racism for their own agendas. Even individuals who would later oppose integration, such as *Richmond News Leader* editor James J. Kilpatrick, initially spoke of the Court’s decision neutrally. Kilpatrick wrote in an editorial: “To bring the two races together in the social intimacy of a classroom will not come easily to the South. ... However, if the court would consent to a more moderate program of integration, the prospect of preserving public education in the South would be immeasurably improved.” He spoke on the importance of preserving public education in Virginia and explained how the *Brown* decision should not cause a system of “tutors and private schools for the well-to-do, and illiteracy for everyone else.”¹⁷ These statements echoed the feelings of other white conservatives, who believed change should happen eventually, but not in the form presented by the Court.

Amongst the reactions of white Southerners, many of Virginia’s political and educational leaders were more concerned about *Brown*’s long-term impact than the often-described “immediate” anger. Bitterness was one popular sentiment, as many believed the Supreme Court infringed on the conventions of the South. College students at the University of Virginia claimed this bitterness was justified; an excerpt from a 1954 editorial in the *University of Virginia Cavalier Daily* read, “It is hard from a strict legal point of view to justify any action contrary to law,” displaying wariness and annoyance more than an outright defiance of *Brown*.¹⁸ Additionally, some Virginia government officials voiced a variety of responses to the Supreme Court’s ruling. State Superintendent of Public Instruction Dowell J. Howard and State Attorney General J. Lindsay Almond Jr. both expressed their apprehension regarding the decision and its implementation, but also expressed their belief that Virginia would be compliant with the new federal

standard. As Almond Jr. stated, “The highest court in the land has spoken and I trust that Virginia will approach the question realistically and endeavor to work out some rational adjustment.”¹⁹

Parents and Teachers’ Unease

Though African Americans acknowledged the good intentions of the *Brown* decision, many teachers and parents were unsure whether the Supreme Court was introducing the right course of action when it came to African Americans attaining equal rights. The equalization suits which preceded *Brown* aimed to protect and improve the resources and facilities already available to African American students and teachers. These cases intended to find a middle ground of progress which was palatable to a larger portion of the public. Since the outcomes of these cases hardly succeeded in the ways those who filed had hoped for—the results they sought either succeeded with partial equality or were wholly denied by the courts—*Brown* aimed to overhaul this separated system. *Brown* called for no equalization of different school systems, but for the integration of students into unified school systems. *Brown* introduced a new hope for progress, but it failed to consider the inequalities integration could create for African American students and teachers. Overturning America’s deep-rooted cultural and social racism would take more effort than one legal victory could achieve.

Overturning America’s deep-rooted cultural and social racism would take more effort than one legal victory could achieve.

In Prince Edward County, Virginia, African American parents watched legislators withhold funds for public schools while elitist white-only private schools were established to prevent integration. In the state of Florida, African Americans could not see the reality of *Brown*’s proposed “fixes” for equal rights. Some wanted to focus on equalization, or the equal distribution of resources between African American and white schools, which was already occurring in some Southern states, rather than uproot an entire infrastructure the population knew and accepted. As Judge Constance Baker Motley recounted, “They [the NAACP] brought a number of cases seeking to equalize the salaries of Black teachers. They also brought cases which were directed at the graduate school level because no separate facility had been provided for Blacks at that level.” Motley explained

¹⁵ David John Mays, *Race, Reason, and Massive Resistance: The Diary of David J. Mays, 1954-1959*, ed. James R. Sweeney (Athens: University of Georgia Press, 2008), 36.

¹⁶ Lillian Smith, “Ruling on Schools Hailed,” letter to the editor, *New York Times*, May 31, 1954, Proquest.

¹⁷ James J. Kilpatrick, “The Decision,” editorial, *Richmond News Leader*, May 18, 1954.

¹⁸ “Violates’ Way of Life,” *Cavalier Daily*, May 18, 1954, quoted in Martin Jr., “*Brown v. Board of Education*,” 206-207.

¹⁹ Quoted in Benjamin Muse, *Virginia’s Massive Resistance* (Bloomington: Indiana University Press, 1961), 5.

how the NAACP expected resistance, but nowhere near the sophisticated or extensive lengths actually taken by the opposition.²⁰

Parents worried about the safety of their children and advocated for maintaining segregation. Thus far, their children had associated with those who were like them, which was not the case when school integration started. Additionally, some argued that maintaining segregated public schools would keep violent and cruel resistance efforts at bay. As *The Chicago Defender* noted in a 1957 article, “[The] Negro proportion of school enrollment in Southern and border states has declined in ten states and increased in seven states and the District of Columbia in five years since the original school segregation cases went to the U.S. Supreme Court.” Parents’ caution with the system of integration and its dangers led to large groups of African Americans fleeing to the North, where they believed they would experience less hostility and condemnation that many Southern whites harbored during this time period.²¹

Parents opted to send their children to other school districts when their local schools closed. As one Prince Edward County father, Phillip Ward, explained to his daughter, “the whites don’t want Black kids to be with their kids. They feel you’re below them.”²² Ward’s words conveyed the reality many Southern African Americans faced, a reality that had been their worry since the *Brown* decision. Though parents were defeated and unhappy about the lack of substantial enforcement for school integration, they were nonetheless determined to see their children receive a proper education.

The dangers of integration African American parents worried about were not always as civil as school closures; one event demonstrated that violence was a real threat facing African Americans seeking to integrate. In 1958, Clinton High School in Clinton, Tennessee, was bombed with dynamite after the state of Tennessee implemented integration on a local option basis. Integration in Clinton first occurred during the 1956-1957 school year. By the second day of classes, there were already threats of violence. The National Guard was called to keep the peace for the following two weeks. This temporary alleviation did not cease acts of violence and intimidation; shots were fired, and dynamite was thrown into Afri-

can American communities. The principal of Clinton High School even faced bomb threats by angry white townspeople. This tension over integration came to a breaking point when the school was bombed one night in October, 1958. Three separate explosions obliterated the interior of the school, causing damage which led the local newspaper publisher to predict that “it would be quite a while before classes can be resumed at the school.”²³ A statement released by Clinton Police Chief Francis Moore explained how there was “no doubt that this dynamiting is connected with integration of the school.”²⁴ Despite two years of integration, white Southerners still performed extreme measures to express their opposition. Clinton High School’s bombing, and other instances that paralleled it, made national news and further heightened the worries of African American parents.

Many African American teachers were dismissed from their jobs because white teachers were given priority in the integrated school market.

African American teachers also experienced anxiety in light of their diminishing job opportunities as a result of *Brown*. When schools were segregated, African American teachers regularly had the ability to teach at the schools of their own race, since the teaching profession was segregated for teachers as much as it was for students. *Brown* did not make any claims for the desegregation of teachers as schools integrated with one another. As a result, many African American teachers were dismissed from their jobs because white teachers were given priority in the integrated school market. Written only days after the passing of *Brown*, one *Chicago Defender* article noted that “Officials of several states have said they would not employ Negro teachers in integrated schools.” At Athens College in Alabama, the administration team bluntly denied the possibility of ever hiring African American teachers. *The Crisis* included a letter from the registrar of the college to the youth secretary of the NAACP in its June 1954 issue in which the registrar went so far as to proclaim “We will probably never hire any of them [African American teachers]. Your northers [*sic*] ‘Yankee’ friends will employ them. Not us.... Don’t insult us any more with such expectations.” Implementing widespread desegregation was only required at the student level, leaving many African American teachers vulnerable. Due to this lack of federal integration orders at the faculty level, African American teachers were stripped of any hope for job security,

²³ “High School at Clinton Dynamited: Tennessee Offers Reward of \$5000; FBI Joins Inquiry,” *Washington Post and Times Herald*, October 6, 1958, Proquest.

²⁴ “High School at Clinton Dynamited.”

²⁰ Constance Baker Motley, “Eyes on the Prize; Interview with Constance Baker Motley,” interview by Judith Vecchione, *American Archive of Public Broadcasting*, Library of Congress and WGBH, March 8, 1986, https://americanarchive.org/catalog/cpb-aacip_151-zg6g15vcor.

²¹ “Percentage of Negro Pupils Drops in Dixie: Increases in Washington, D.C.,” *The Chicago Defender*, December 14, 1957, Proquest.

²² Betty Jean Ward (African American Prince Edward County student) recounts a talk with her father, in Kristen Green, *Something Must Be Done About Prince Edward County: A Family, a Virginia Town, a Civil Rights Battle*, (New York: Harper Perennial, 2015), 149.

leaving many bitter. Some African American teachers did not want desegregation to take place because it cost them career opportunities and created a new system of exclusivity based upon de facto racism.²⁵

Opposition to Integration

One of the most prominent African Americans who spoke in opposition to the *Brown* decision was Zora Neale Hurston. Hurston was a Southern anthropologist, folklorist, and writer who showed no support for desegregation. Her views demonstrated a stark contrast to the dominant opinion of African Americans at the time; she was a fervent supporter of institutions separated by race. Hurston believed separate institutions preserved and promoted racial pride. She argued that desegregated schools put African American children in the position to feel inferior to their white peers and have to face this inferiority complex head-on. In a letter to the editor of a Florida paper, Hurston wrote, “How much satisfaction can I get from a court order for somebody to associate with me who does not wish me near them?” Hurston expressed her sentiments: “I regard the ruling of the U.S. Supreme Court as insulting rather than honoring my race.” Unlike many African Americans who reacted to the *Brown* decision with hopeful wariness, Hurston stated her contempt openly and called for others to express their frustrations. She believed there was no need for sympathy or respect for those who saw race as a “tragedy of color.” Hurston believed those who shared these opinions overlooked the possible benefits of segregated education and that groups rallying in support of *Brown* did not consider all the factors and effects of the Supreme Court’s decision before pressuring others to support it. She continued her support for segregated education and her preference for equalization by explaining, “Negro schools in the state are in very good shape and on the improve.” In Hurston’s eyes, equalization and gradualism proved a more promising movement toward equal rights for African Americans than forced progress.²⁶

Massive Resistance

Virginia Senator Harry F. Byrd’s immediate response represents the intense backlash and criticism surrounding *Brown*. He argued it was “the most serious blow that has been struck against the rights of the states in a matter vitally affecting their authority and welfare.”²⁷

²⁵ Darrell Garwood, “Kill Jim Crow Schools: U.S. Supreme Court Rules Unanimously in Ending Segregation in Education,” *The Chicago Defender*, May 22, 1954, Proquest; F. D. Ward, letter to Herbert L. Wright, 2 June 1954, *The Crisis*, June-July 1954, 336.

²⁶ Zora Neale Hurston, “Court Order Can’t Make Races Mix,” letter to the editor, *Orlando Sentinel, The Public Thought*, August 11, 1955, quoted in Martin Jr., “*Brown v. Board of Education*,” 209-212.

²⁷ For a biography of Harry F. Byrd, see Ronald L. Heinemann, *Harry Byrd of Virginia*

Byrd believed the Supreme Court’s decision for school integration was outside the federal government’s jurisdiction and scope, and he reacted defiantly when other state officials suggested compliance to *Brown*. As head of Virginia’s Democratic Party machine, Byrd rallied support against integration throughout the state. Byrd did not conduct his agenda publicly, however, but gathered support behind the scenes through persuasion of other Virginia government officials, such as Governor Thomas B. Stanley.²⁸

Byrd used his political prowess, knowledge of loophole manipulation, and persuasive speech to change minds from compliance to resistance.

Byrd used his political prowess, knowledge of loophole manipulation, and persuasive speech to change minds from compliance to resistance. He began by working with his Southern colleagues in the District of Columbia to prepare for an all-Southern resistance gesture. He also supported the idea of interposition, in which a state had a right to “interpose its sovereignty” between its citizens and the federal government. In these subtle ways, Byrd persuaded other Virginia and Southern officials. Governor Thomas B. Stanley’s change of heart was most evident, as he initially accepted the *Brown* decision in May 1954, but within two short months threatened to use all of his power to continue segregated schools in Virginia. By September 1954, Stanley called for a board, known as the Gray Commission,²⁹ to discuss *Brown* and determine the best course of action to resist its implementation. Stanley’s stance completely changed, as his original words—“I am confident the people of Virginia will receive the opinion of the Supreme Court calmly and take time to carefully dispassionately consider the situation before coming to conclusions on steps which should be taken”—became null at the hands of Byrd’s influence. Byrd’s puppeteering caught the attention of notable officials and gained momentum.³⁰

(Charlottesville: University Press of Virginia, 1996).

²⁸ “Governor to Call Meeting of State Leaders on School Problem: Stanley Sees No Need Now for Assembly Meeting,” *Richmond Times-Dispatch*, May 18, 1954; Muse, *Virginia’s Massive Resistance*, 26; Brian J. Daugherty, “Keep on Keeping On: African Americans and the Implementation of *Brown v. Board of Education* in Virginia,” in *With All Deliberate Speed: Implementing Brown v. Board of Education*, eds. Brian J. Daugherty and Charles C. Bolton (Fayetteville: University of Arkansas Press, 2008), 43-44.

²⁹ A commission appointed by Governor Thomas B. Stanley in August 1954. The purpose of the Gray Commission was to investigate the effects of the *Brown* decision and to make implementation recommendations to the Virginia legislature. All members of the commission were white, male legislators from the Fourth District (Southside) of Virginia, where the state had its most concentrated African American populations. By November 1955, the Gray Commission provided its final report, where they offered the idea of a “local option,” which granted each locality in the state the right to process desegregation at its own speed, and recommended amending the Virginia State Constitution, Section 141, to allow “tuition grants” to white parents for the private education of their children.

³⁰ Muse, *Virginia’s Massive Resistance*, 22, 27; Brian J. Daugherty, “Keep on Keeping On,” 44; “Governor to Call Meeting,” *Richmond Times-Dispatch*, May 18, 1954.

Byrd encouraged his resistance agenda amongst other Southern representatives in DC more aggressively two years after the original *Brown* decision. Southern senators and representatives deliberated this agenda set in opposition to integration. On March 12, 1956, Georgia Senator Walter George introduced the infamous “Declaration of Constitutional Principles,” which would later be known as the Southern Manifesto. The document made headlines as it publicly contested the federal government’s involvement and claimed, “This unwarranted exercise of power by the court, contrary to the Constitution, is creating chaos and confusion in the states primarily affected.” Furthermore, the *Brown* decision was “destroying the amicable relations between white and Negro races that have been created through ninety years of patient effort by the good people of both races. It has planted hatred and suspicion where there has been heretofore friendship and understanding.” This declaration exhibited the first strong example of Massive Resistance. The opposition movement would exist in the South for the next decade, especially after *Brown II*’s (1955) “all deliberate speed” ruling,³¹ which made integration difficult for the federal government to enforce. Massive Resistance was a strategic movement that utilized state legislation to prevent school integration by passing laws and policies in opposition. Byrd endorsed its development and publication along with Senator Strom Thurmond of South Carolina, who wrote the early drafts of the Southern Manifesto. Thus, Byrd secured his place as the founder of the Massive Resistance movement that would permeate the South.³²

Massive Resistance was a strategic movement that utilized state legislation to prevent school integration by passing laws and policies in opposition.

While his “behind closed doors” and “official” proceedings occurred amidst other Southern representatives, Byrd continued to rally support for resistance in his home state of Virginia. On July 2, 1956, he called Governor Stanley, State Senator Garland Gray, and other reliable leaders of his political organization for a secret conference to discuss the necessary action for defiance. During the meeting, Byrd convinced these officials to charge full speed ahead in their anti-integration efforts through legislative measures. He also convinced Stan-

ley to hold a special session to discuss Virginia’s plan of resistance. In compliance with this suggestion, Stanley called for a special legislative session of the Virginia General Assembly on August 27, 1956. The session was held in Richmond and lasted twenty-seven days. During this time, they passed twenty-three acts regarding the school segregation issue. Passing these acts began the legislative crusade of Massive Resistance in Virginia. Though the legislators claimed the concept of “local option” was in practice, schools that opted for integration would be promptly “closed and removed from the public-school system.”³³

Spread of Massive Resistance

Virginia’s resistance created a path for other states, such as Georgia, to follow. Prior to *Brown*, Georgia was in the process of making plans for state school equalization, regardless of the resistance within the state. Many white Georgians maintained similar sentiments and agendas as their Deep South and Virginia counterparts, with varying expressions of defiance and resistance. To ensure the legal nullification of the *Brown* decision, Georgia government officials created a proposal that provided educational vouchers to students via the state and local governments. The vouchers would separate children of different races without technically constituting “discrimination;” this proposal became known as the “private school plan.” It received backlash nationwide by both whites and African Americans once it passed as an amendment to the state’s constitution. This new amendment provided the Georgia state legislature with a green light to propose and pass more anti-integration laws, under the condition that these laws would not pose legal challenges or explicitly contradict the federal ruling. The resulting laws and other legislation passed in Georgia, such as the ability to close public schools that were federally ordered to desegregate, became part of the Massive Resistance movement as other Southern states followed these procedures. As long as school segregation fit within the legal jurisdiction of states, integration would be resisted with “all deliberate speed.” The “private school plan” amendment displayed Southern segregationists’ determination to preserve an institution teeming with discrimination and ignorance.³⁴

Segregationists did not exist solely in the Southern states. Former border states, such as Delaware, employed considerable resistance against school integra-

³¹ “With all deliberate speed” was a portion of the *Brown II* ruling which allowed local school boards to integrate African American and white students at a pace they deemed appropriate. This vague phrase enabled many Southern states to slow down, and even halt, any progress of the original *Brown* decision. Though this phrase was intended by the Supreme Court to soften the blow of inevitable integration, it resulted in greater resistance by states.

³² Wilhoit, *Politics of Massive Resistance*, 51-53; “96 Congressmen’s Declaration on Integration” *New York Times*, 12 March 1956.

³³ Muse, *Virginia’s Massive Resistance*, 28-31.

³⁴ Thomas V. O’Brien, “Defiance, Protest, and Compromise: The Struggle to Implement *Brown* in Georgia, 1950-1973,” in *With All Deliberate Speed: Implementing Brown v. Board of Education*, eds. Brian J. Daugherty and Charles C. Bolton (Fayetteville: University of Arkansas Press, 2008), 95-96.

tion. Many Delaware citizens held Southern-minded and traditionalist views pertaining to segregation, despite a small African American population. When there was a shortage of funding for higher education, Delaware officials proposed integrating Delaware State College, a historically African American college, and the University of Delaware, a historically white institution; both African American and white citizens of the state opposed the plan. Though some school districts were integrated, which received praise from northern neighbors, the *Brown* decision incited cruel and hateful opposition in other communities in the state, such as Milford in the fall of 1954. When school began in September, the formerly white high school in Milford admitted eleven African American students for the school year. By September 20, the local government closed all Milford schools indefinitely in an act of resistance. One week later, Milford High School reopened. State and local police were present as protestors threatened white and African American students alike for attending class. Some groups, such as the National Association for the Advancement of White People (NAAWP), went so far in their hate crimes as to hand out sheets of hateful messages, call and threaten African American parents for sending their children to a formerly white-only school, and scratch the names of the Milford Eleven from enrollment records. The “Milford Incident,” as it was commonly referred to, showcased how Massive Resistance became practiced in multiple states within the turn of a year.³⁵ This incident exemplifies the direct opposition over the outcome of *Brown*.

Conclusion

The *Brown* decision caused an uproar across the United States. Integration would not be fully implemented until an entire decade after the Supreme Court’s initial decision. The Massive Resistance movement maintained a steady prominence during this time, as many states continued to defy the federal government’s jurisdiction. *Brown* challenged the infrastructure of Southern society, which was based on Jim Crow laws and institutional segregation to maintain the “inferior” status of African Americans. Though this landmark case was a great victory for the American civil rights movement in the 1950s and 1960s and the advancement of equality among all citizens, its ambiguity and brevity helped little in the guidance of racial issues and proper means of desegregating public schools.

Brown served as a catalyst for cultural and legislative

change. The decision affected every American, providing a broad spectrum of emotional sentiments regarding its ruling. Many people on both sides believed the decision was merely a “cultural shock” and “quick fix” to a larger and more deeply embedded social problem in America. The acceptance or defiance of *Brown*, and of the larger civil rights movement, was not a position taken by groups wholly as Americans are often taught. This distorted narrative too broadly simplifies an event and movement which called each American to reflect on their personal values and what is meant by the idea of equality.³⁶

³⁵ Bradley Skelcher, “Promises of *Brown*: Desegregating Education in Delaware, 1950-1968” in *With All Deliberate Speed: Implementing Brown v. Board of Education*, eds. Brian J. Daugherty and Charles C. Bolton (Fayetteville: University of Arkansas Press, 2008), 155-161; June Shagaloff, “Desegregation of Public Schools in Delaware,” *The Journal of Negro Education* 24, no. 3 (1955): 197-198, <https://doi.org/10.2307/2293451>.

³⁶ Wilkinson III, *From “Brown” to “Bakke,”* 48-49.



Author's Note

Haylee Orlowski

Haylee Orlowski ('21) graduated with a History major and a double minor in Pre-Professional Secondary Education and Interdisciplinary Social Sciences. She plans to continue her education, pursuing a Master of Arts in Teaching from James Madison University.

Haylee would like to thank Dr. Hyser for his constant support, advice, and encouragement over the course of this project and her collegiate career. She would also like to thank the *JMURJ* Editorial Board for their aid in refining her paper for publication.

Bibliography

Bartley, Numan V. *The Rise of Massive Resistance: Race and Politics in the South During the 1950's*. Baton Rouge: Louisiana State University Press, 1969.

Cassimere Jr., Raphael. "Remembering *Brown vs. Board of Education*." *Crisis* 101, no. 4 (May 1994): 10. Education Research Complete.

Daughterity, Brian J. "'Keep on Keeping On': African Americans and the Implementation of *Brown v. Board of Education* in Virginia." In *With All Deliberate Speed: Implementing Brown v. Board of Education*, edited by Brian J. Daughterity and Charles C. Bolton, 41-57. Fayetteville: University of Arkansas Press, 2008.

Ezra, Michael, and Peter C. Mancall. *Civil Rights Movement: People and Perspectives*. Santa Barbara, CA: ABC-CLIO, 2009.

Garwood, Darell. "Kill Jim Crow Schools: U.S. Supreme Court Rules Unanimously in Ending Segregation in Education." *Chicago Defender*, May 22, 1954. Proquest.

"Governor to Call Meeting of State Leaders on School Problem: Stanley Sees No Need Now for Assembly Meeting." *Richmond Times-Dispatch*. May 18, 1954.

Green, Kristen. *Something Must Be Done About Prince Edward County: A Family, a Virginia Town, a Civil Rights Battle*. New York: Harper Perennial, 2015.

Heinemann, Ronald L. *Harry Byrd of Virginia*. Charlottesville: University Press of Virginia, 1996.

"High School at Clinton Dynamited: Tennessee Offers Reward of \$5000; FBI Joins Inquiry." *Washington Post and Times Herald*. October 6, 1958. Proquest.

Hurston, Zora Neale. "Court Order Can't Make Races Mix." Letter to the editor. *Orlando Sentinel, The Public Thought*. August 11, 1955. Quoted in Martin Jr., "*Brown v. Board of Education*": *A Brief History with Documents*. Boston: Bedford/St. Martin's, 1998.

"Integration Foes Seen Facing Suits." *Washington Post and Times Herald (1954-1959)*. November 29, 1954. Proquest.

Kilpatrick, James J. "The Decision." Editorial. *Richmond News Leader*, May 18, 1954.

———. *The Southern Case for School Segregation*. New York: Crowell-Collier Press, 1962.

Kluger, Richard. *Simple Justice: The History of "Brown v. Board of Education" and Black America's Struggle for Equality*. New York: Knopf, 2004.

Martin, Waldo E., Jr. "*Brown v. Board of Education*": *A Brief History with Documents*. Boston: Bedford/St. Martin's, 1998.

Maxwell, Angie. *The Indicted South: Public Criticism, Southern Inferiority, and the Politics of Whiteness*. Chapel Hill: The University of North Carolina Press, 2014.

Mays, David John. *Race, Reason, and Massive Resistance: The Diary of David J. Mays, 1954-1959*. Edited by James R. Sweeney. Athens: University of Georgia Press, 2008.

McCain, R. Ray. "Reactions to the United States Supreme Court Segregation Decision of 1954." *Georgia Historical Quarterly* 52, no. 4 (1968): 371-87. www.jstor.org/stable/40578897.

Moran, Peter William. "Border State Ebb and Flow: School Desegregation in Missouri, 1954-1999." In *With All Deliberate Speed: Implementing "Brown v. Board of Education"*, edited by Brian J. Daughterity and Charles C. Bolton, 175-198. Fayetteville: University of Arkansas Press, 2008.

Motley, Constance Baker. "Eyes on the Prize; Interview with Constance Baker Motley." Interview by Judith Vecchione *American Archive of Public Broadcasting*. Library of Congress and WGBH. March 8, 1986. https://americanarchive.org/catalog/cpb-aacip_151-zg6g15vcor.

- Muse, Benjamin. *Virginia's Massive Resistance*. Bloomington: Indiana University Press, 1961.
- "NAACP Encouraged, Virginians Are Told." *Washington Post and Times Herald*. October 12, 1954. Proquest.
- "Nat'l Leaders Laud Ban on School Segregation: Supreme Court's Decision Called 'Long Over Due,'" *Pittsburgh Courier*. May 29, 1954.
- O'Brien, Thomas V. "Defiance, Protest, and Compromise: The Struggle to Implement *Brown* in Georgia, 1950-1973." In *With All Deliberate Speed: Implementing "Brown v. Board of Education,"* edited by Brian J. Daugherty and Charles C. Bolton, 93-122. Fayetteville: University of Arkansas Press, 2008.
- Patterson, James T. *"Brown v. Board of Education": A Civil Rights Milestone and Its Troubled Legacy*. New York: Oxford University Press, 2001.
- "Percentage of Negro Pupils Drops in Dixie: Increases in Washington, D.C." *Chicago Defender*. December 14, 1957. Proquest.
- Sargent, Frederic O. *The Civil Rights Revolution: Events and Leaders, 1955-1968*. Jefferson, NC: McFarland, 2004.
- Schuyler, George S. "High Court Decision Was No Surprise to Him." Opinion. *Pittsburgh Courier*, May 29, 1954.
- "Segregation Decision." Editorial. *The Crisis*. June-July 1954. 352. https://books.google.com/books?id=9VcEAAAAMBAJ&printsec=frontcover&source=gbs_ge_summary_r&cad=0#v=onepage&q&f=false.
- Shagaloff, June. "Desegregation of Public Schools in Delaware." *The Journal of Negro Education* 24, no. 3 (1955): 188-204. <https://doi.org/10.2307/2293451>.
- Skelcher, Bradley. "Promises of *Brown*: Desegregating Education in Delaware, 1950-1968." In *With All Deliberate Speed: Implementing "Brown v. Board of Education,"* edited by Brian J. Daugherty and Charles C. Bolton, 155-173. Fayetteville: University of Arkansas Press, 2008.
- Smith, Lillian. "Ruling on Schools Hailed." Letter to the editor. *New York Times*, May 31, 1954. Proquest.
- Telgen, Diane. *Defining Moments: "Brown v. Board of Education."* Detroit: Omnigraphics, 2005.
- "Text of 96 Congressmen's Declaration on Integration." *New York Times*. March 12, 1956. Proquest
- Ward, F. D. Letter to Herbert L. Wright, June 2, 1954. *The Crisis*, June-July 1954, 336. https://books.google.com/books?id=9VcEAAAAMBAJ&printsec=frontcover&source=gbs_ge_summary_r&cad=0#v=onepage&q&f=false
- Wilhoit, Francis M. *The Politics of Massive Resistance*. New York: George Braziller, Inc., 1973.
- Wilkinson III, J. Harvie. *From "Brown" to "Bakke": The Supreme Court and School Integration (1954-1978)*. New York: Oxford University Press, 1979.
- Williams, Juan. "Thurgood Marshall and *Brown v. Board of Ed.*" *Morning Edition*. National Public Radio, December 8, 2003. <https://www.npr.org/2003/12/08/1535826/thurgood-marshall-and-brown-v-board-of-ed>;
- Zimmerman, Lynn W. "Reflections on *Brown*." *American Educational History Journal* 33, no. 2 (Fall 2006): 89-96. Education Research Complete.