

# How Did the Brown V. Board of Education Encounter the White Resistance to Black Enrollment Achievement in Higher Education?

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## Abstract

Brown V. Board of Education is an opportunity for black to enroll and persist in higher education. However, blacks faced barriers through the resistance of the group of dominant white supremacists. Scholars are interested in challenging black enrollment in higher education to help understand the black students' experiences after Brown V. Board of Education, which outlawed Plessy V. Ferguson in the concept of "separate but equal" to keep black students from white students. In this essay, some cases regarding black enrollment will be investigated to bring light to black student experiences in higher education.

## Keywords

Higher Education, Black Students, Enrollment, Brown V. Board of Education, Plessy V. Board of Education, Racial Discrimination, White Supremacist, Jim Crow, Segregation

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## 1. Introduction

In this essay, the enrollment of blacks in universities in the United States can explain by the challenge before 1954 and the court decision revolutionary of Brown V. Board of Education. The enrollment of Black African Americans in Higher education in the United States has been encountered by the vital court decision Plessy V. Ferguson, which emphasized the exclusion of Blacks in Higher education. Before 1954, universities were predominantly white-privileged, and Blacks could not enroll in all universities because of their color. This essay focuses primarily on the Brown V. of Board of Education and its challenges to black enrollment in higher education. The Brown decision brought into context Plessy V.

Ferguson, which stated that “separate but equal” segregation enforcement was unconstitutional. One of the strategies to increase black enrollment in universities was to advocate for black schools, as the National Association of the Advancement of the People of Color (NAACP) and Black educators embraced. After 1954 with *Brown v. Board of Education*, there was an enrollment of no significant increase of Blacks in higher education while fighting the resistance of the white supremacist. The enrollment of Blacks increased slowly until the 1960s when they encountered resistance on the campus. Robert Singleton, Bruin NAACP president and a graduate student in economics, said the group’s purpose was to “abolish discrimination against all minorities, in all separate spectrum of forms, from *jure* to the *facto*” (Cole, 2020: p. 135). Education was the key for blacks to overcome racial oppression, and they encountered much resistance to this opportunity. There is consistent violence against black education. It is critical to look at the views of scholars and black activists from a historical perspective of Jim Crow and the post-*Brown v. Board of Education* era to respond to the interrogation posed in this essay.

This essay overviews the purpose of *Brown v. Board of Education* against *Plessy v. Ferguson* in fighting segregation to increase black enrollment in colleges and universities. The *Brown v. Board of Education* followed the revendications of the NAACP. The role of the NAACP and *Brown* decision and activists in the enrollment of Blacks in higher education is critical as they fought segregation and the Jim Crow Laws. The NAACP and *Brown v. Board of Education* are dedicated to supporting all the interests of black people, including education concerns. The *Brown v. Board of Education* followed the path to embrace educational concerns by putting blacks into action. This literature intends to analyze the *Brown v. Board of Education* in the quest for blacks in higher education opportunities and its challenges. The *Brown v. Board of Education* was not the last court decision denying blacks acceptance in colleges and universities. *Regents of the University of California v. Bakke*, *Bakke* case, the University Medical School of California denied Bakke’s acceptance under the general school admission for 1973 and 1974 (Adams, 1996: p. 499). As a court decision, the hostile campus environment and white resistance to black enrollment in higher education will be analyzed from a historical perspective of the *Brown v. Board of Education* challenges.

In the context of understanding the challenges of the *Brown v. Board of Education* decision, this essay emphasizes the long history of violence imposed by Jim Crow and *Plessy v. Ferguson*, which affected the enrollment of black African Americans in higher education and restricted their access to public facilities. How does school segregation affect Black African American Education enrollment in higher education? In a historical context, how do scholars look at the concept of school segregation to respond to the questions? Scholars argued that the persistent violence imposed on black African Americans and after decades, *Brown v. Board of Education* still struggles in its application (Cole, 2020; Condrón et al., 2013; Peters, 2019). The violence exercised on the blacks by the dominant groups

to enroll in higher education will be investigated. That will help to better understand why the dominant groups wanted to keep black uneducated. The fight of the NAACP found its strengths in the black education critical theory lens, as educating black is the only way for them to overcome racial oppression. In this critical theory lens, segregation, scarcity of resources, and dominant group influence will be analyzed to determine the challenges of the Brown V. Board of Education.

## 2. Education Challenges in the Legal Perspective Regarding Segregation

The History of America and its colleges and universities are built on violence. Brown v. Board of Education was one of the most critical court decisions in the History of America. Peters's (2019) study emphasized that, despite the threats and violence, Black African leaders are dedicated to educating the community by recognizing how much the value of education. In the study by Alridge (2021), the author argued that the white supremacist ingrained in the U.S. system and racism is far from being eradicated. Therefore, Plessy V. Ferguson, in coordination with Jim Crow law, was the main factor in the exclusion of Black African Americans from higher education (Cortada, 1980; Morris, 2001). The Brown v. Board of Education's response to the unconstitutionality was an opportunity around 1954 for Black African Americans to increase their enrollment in Higher education.

The school system segregated African American students, and in the Brown decision, the Supreme Court declared that segregation in schools was unconstitutional. For example, Plessy V. Ferguson with the "separate but equal," which violated the 14th Amendment of the constitution in equal protection. Therefore, education was considered a white privilege. Those challenges led scholars to understand the relationship between law and racial change in this work. Carter, in his statement, argued, Brown altered the status of blacks before the law, No longer supplicants, seeking, pleading, begging to be treated as full-fledged members for the human race...Now they were entitled to equal treatment as a right under the law (Bell, 2004: p. 96).

In the surrounding area of the Boston Metropolitan, poor people of color are at least three times in racial stratification than whites (Guinier, 2004). The Supreme Court contested the racial inferiority blacks have suffered, Chief Justice Earl Warren led the Court to declare segregation unconstitutional (Guinier, 2004). Black students were denied enrollment based on a matter of their color. The Brown decision responded to Plessy v. Ferguson, which emphasized school segregation, pronounced that "Separate but equal" was unconstitutional, and violated the Fourteenth Amendment of equal protection. Segregating children based on race was unconstitutional (Ford & King Jr., 2014: p. 208). Brown's decision ordered the desegregation of the U.S. schools that outlawed Plessy Ferguson. There will be a further analysis of the History of segregation to understand the challenges of the post-Brown decision and its implication. Undoubtedly,

education is the binding site of the black struggle.

Douglas responded within the historical context of “The Battle over Northern School Segregation, 1865-1954” to understand this issue. Douglas explains the real story from a legal perspective of school segregation with the aim of discrimination to establish “separate but equal” as a solution. Historian Carl Kaestle in the antebellum era, enforced the separation of races as blacks and whites are different species (Douglas, 2005). The contribution of James A. Anderson in *The Education of Blacks in the South, 1860 to 1935*, explains the oppression of that time when they pushed black students into a system of industrial education (Anderson, 2010). Hilary J. Moss explains education as whiteness and whites’ opposition to black education. Educating blacks during the antebellum era was a crime, and there was more violence before the Brown decision. In 1857, thirty-two Frederick County residents petitioned again to free Black African Americans from operating schools (Moss, 2010).

### 3. Brown V. Board of Education and Racial Oppression

Brown V. Board of education in 1954 embraced the black exclusion in higher education to enhance black education. Frederick Douglas, as enslaved, was considered a figure of racial oppression, fugitive slave, and fugitive literacy, and his success in being educated may consider an example of how black can escape from slavery (Givens, 2021). The fugitive pedagogy frames the black education from slavery following Jim Crow in a limited world that blacks found themselves and they should find an alternative to escape. Therefore, education is the only way that blacks can overcome their racial exclusion. Despite the challenges encountered by the white system, the “fugitive pedagogy” is considered the theory and practice of black education through the racial theory lens. All the challenges for black to enroll in higher education led to the understanding that education is a white privilege which is explained by the black’s positionality. For example, the seven children of Carter enrolled in white schools were ignored and faced abuse as they were called nigger (Patterson & Freehling, 2001). The NAACP, Brown V. Board of Education, teachers, communities, and other social movements around the 1950s emphasized their mission to transform the lives of Black students (Givens, 2021). Despite the efforts of all the entities to fight against black exclusion, school segregation was maintained. Even though all the challenges, education is the only path to escape from racial oppression.

### 4. School Segregation to Enforce Education as White Privilege

In order to understand the deficiency of the Brown v. Board of Education and its trans-demography approach, it is essential to look back at the History of higher education. From 1860 to 1935, there was no intention to educate blacks; rather than dehumanize them and exploit them to build the wealth of the dominant groups with the implication of the industrial schools Hampton-Tuskegee for

blacks. Samuel Chapman Armstrong stated that The Negro has one source of strength, arguing the “habit of industry acquired in the time of slavery” (Anderson, 2010: p. 42). There was fear for blacks to be educated for the white supremacists to maintain racial stability when knowing that “Knowledge is power” (Moss 2010: pp. 61-62). Reformers argue that segregated schools lower the black network opportunities whites enjoy due to job discrimination and poverty (Patterson & Freehling, 2001). There was a strong limitation in enrollment for black students; this phenomenon was in segregated states and nationwide (Thelin, 2019). It was challenging for the National Association for the Advancement of Colored People (NAACP) to overthrow Jim Crow education (Irons, 2004). One of the demands of black teachers is, “NEGRO YOUTH MUST BE EDUCATED-NEGRO YOUTH SHALL BE EDUCATED” (Walker, 2013: p. 10). The Brown decision exists because of the efforts of black educators and the NAACP to fight the Jim Crow law. Critics against the Jim Crow law, whites supported the segregated schools enhancing a discriminatory system with the intent to prevent inter-racial contact and to keep blacks in servile positions (Bell, 2004). Therefore, without the support of the NAACP, black educators, and civil movements of the 1960s, Brown V. Board alone would never have had the easy task of making higher education a place for blacks to enroll and receive a quality education.

## 5. Non-Dominant Groups and Neighborhood Impacts on Education

African Americans and Latino/a/s combined, revealing similar patterns as underrepresented (Holme & Heilig, 2013: p. 618). African children, among other children, still face unequal opportunities to learn (Weinstein et al., 2004). They are segregated based on socio-economic disadvantage. There is a correlation between Schools and neighborhoods generating unequal opportunities, less qualified teachers, and high teacher turnover (Condron et al., 2013). One of the goals of black scholars is to address issues related to creating an environment more inclusive. The Plessy Ferguson took place based on scientific racism supported by whites to promote the exclusion of blacks from public facilities and schools.

The National Association for the Advancement of Colored People (NAACP) was at the center of the issue of desegregating schools so that blacks could enroll. Some admission processes still discriminate against blacks based on skin color. For example, at Princeton University, the admissions staff recruited elite northeastern preschools; as we know, those schools do not have many black students (Cole, 2020). Even until 1962-1963, black admissions remained stagnant; among 1202 letters of acceptance from the spring of 1963, only 13 had been mailed to black students, just an addition of one black student compared to the previous year (Cole, 2020).

## 6. Post Brown V. Board of Education and Social Movements

The 1960s brought all the hallucinations blacks suffered from the Jim Crow law,

and black students stood for their rights. They have the opportunity of the Brown decision and civil rights movement, and the full right to separate is equally unconstitutional as a violation of the 14th Amendment regarding equal protection. There was a slow growth of black enrollment in higher education, while the Brown V. Board of education racial aspirations remained unrealized (Carson, 2004). The student movement of the 1960s and 1970s brought significant changes to black colleges (Biondi, 2012). The destiny of the blacks relies on their capacity to fight every day for social justice. The NAACP is an excellent tool for minorities to tackle racism in education. In the Brown V. Board of Education philosophy, black college presidents pushed southern governors to develop regional colleges for Black people instead of desegregating existing white universities (Cole, 2020). They stood in federal commissions to disregard the “Separate but equal” schools and published research to secure more funding for Black higher education (Cole, 2020).

Despite a lot of actions of the NAACP and Brown V. Board of Education, education remained a white privilege. During the 1960s and 70s, there was an increase for both blacks and whites in higher education by enhancing social values. Blacks saw this opportunity and brought them to high educational and economic status. In 1964-65, congress passed the civil rights and education laws, giving the government powerful new weapons to fight for the desegregation of the schools (Patterson & Freehling, 2001). Different factors caused the increase in enrollment, financial aid availability, the social and economic value of college education, and the growth of colleges (Harvey et al., 2004). Before the Brown decision, there were no blacks holding faculty positions at PWIs, the Brown decision brought a change to that, but the percentage remains low. In 1980, the percentage of African Americans in all institutions was 4.3% (Harvey et al., 2004). Despite the social progress, there is still supremacism among African Americans in higher education compared to whites. Colleges and universities have been controlled by a white supremacist, and black enrollment in college is still challenging. If they give black some opportunities to learn, it is to grow the wealth of white supremacists because of the job market demands.

## 7. Hostile Campus Environment and White Resistance

The enrollment of blacks in universities created fear in white, inciting violence on campus. In universities, black enrollment came with riots against their admissions. While the university grew, white residents’ opinions on desegregation remained consistent (Cole, 2020). There was a misleading in the Mississippi leaders to prevent violence on campus regarding black university enrollment. It was a crisis in the universities of Alabama and South Carolina to have the troop intervention on campus. In both states, the segregationist sentiments proved that there was more violence against integration (Cole, 2020).

Before the Brown decision, the violence was more visible. Black students were segregated in the classroom. In the same School, black students did not have

access to certain areas; for example, they could not attend the same library as their white counterparts. There are perceptions of the HWIS hostile environment for African Americans (Adams, 1996). Historically the HBCUs remained the home of black African Americans (Adams, 1996). However, according to the U.S. Department of Education, “ten years after the Brown V. Board of Education, almost 98% percent of southern black students still attended predominantly black schools”, Carson, 2004: p. 28).

Even after the Brown decision, black acceptance encountered difficulties, which was not a welcome environment. This atmosphere urged college presidents to be better equipped to address racism, racial tension, and racial violence in higher education (Cole, 2020). The facilities access for blacks was questionable. There was a statement that those black students did not have contact with white students and professors, even graduates, there was no such attachment as alumni, and the worst law school students could receive a less prestigious degree than that the white students received (Patterson & Freehling, 2001). Marshall, the leader of the NAACP, faced case after case as his expectations were about full equality. It has become an era of litigation, and each enrollment process could be subject to a court case. An analysis from that period revealed that true equality within the Jim Crow system was impossible (Patterson & Freehling, 2001). However, they continued to fight even with the consequences.

## **8. White Resistance against Black Enrollment in Higher Education**

The officials’ resistance was remarkable; Governor George C. Wallace in Alabama was one of the governors who expressed his resistance against blacks on campus despite court orders. Wallace said, if a federal judge orders me to place a Negro student in a white school, I will refuse to do so (Cole, 2020: p. 209). All the actions of violence persisted after the Brown V. Board of Education. The governor confronted University leaders over enrolling black. In this instance, desegregation remained a crisis, and Frank A. Rose, president of the U.A., was the leader in bringing change to campus. He encountered roadblocks from the governor in power when he said, “Wallace will create a severe problem for us” (Cole, 2020: p. 217). Blacks tackled the violence in their belief that education was the only path to attend social mobility as they moved away from slavery (Allen et al., 2007).

Frank Anthony Rose, the president of Alabama University, has encountered difficulties with the desegregation crisis with race riots over segregation (Cole, 2020). Governor George C. Wallace was hostile to black enrollment, while they tried to enforce academic freedom, but not equality, Cole, 2020). In 1962, the enrollment of blacks in higher education still suffered resistance from government officials and white students, for example, in the case of the University of Georgia, where two blacks, Charalyne Hunter and Hamilton Holmes, were denied by the school administration and enrolled by court order. This decision in-

cited violence on campus from angry students and klan members (Cole, 2020). White residents' perspectives against desegregation remained. Despite the Brown V. Board of Education, students are still evaluated for admission on the basis of race.

Another kind of segregation for transfer students who attended black colleges and would like to enroll in white schools was denied in the admission process. Previous coursework from unaccredited black colleges. The application of Vivian Malone, a black woman denied by the assistant Dean of admissions for the U.A. Law School, received a notice that her application did the process and could not enroll. The Dean used the same motif to deny (Harold Alonza Franklin, Cole, 2020). White Alabamians strongly supported segregation.

## 9. Impact of Resources on Black Education

One of the main issues was that the all-white state board of education still controlled black colleges, which meant that separation was never equal and kept persisting until the 1970s (Biondi, 2012). Poor performance is predominantly in black and under-resourced schools (Alridge, 2015). Despite the increase in federal funding for black colleges and universities, black colleges suffered a financial crisis, which questionable the quality of education for black colleges (Allen, 2007). There are some concerns about the resources universities put into African American programs; resources are limited to promote success (Harvey et al., 2004). Resources remained one of the main issues that gave the white supremacist the power over higher education. The funding issues may stop minorities from getting access to quality education, affecting enrollment. To this extent, money should spend wisely in the best interest of the students regarding their needs. Economist Jonathan Guryan found that increased educational funding for historically low-spending districts led to improved student achievement in all subject areas, specifically low-scoring students (Carter & Welner, 2013). For example, New Jersey has a massive increase in national rank among the top five states in all subject areas; they found that black and Hispanic students scored 5 to 10 points above their peers nationwide (Carter & Welner, 2013). As a result of investigating the finance system, they found that the state spent half as much on the education of low-income, minority students (Carter & Welner, 2013). They found the New Jersey school finance system unconstitutional; therefore, there was a need to infuse funding to bring the minority students to parity compared to the suburban districts. They implement a new state school curriculum relevant to state standards based on those discrepancies. According to Jim Crow laws, blacks would not benefit the equal educational opportunities (Alridge, 2015). Minority groups are segregated in poor neighborhoods, which limits their access to college enrollment.

Professor Alexander Bickel argued, "The Brown v. Board of Education with an emphasis on the education part title may be headed for dread word irrelevance" (Bell, 2004: p. 94). Alexander explained his argument regarding the school dese-



gregation era. Scholars argue about the Brown decision. Differently, all views may come up because, like others, this decision may have strengths and weaknesses. For example, all public black colleges in the segregated South had been underfunded, located in inferior facilities, and controlled by conservative administrators (Biondi, 2012). Even if schools are segregated or desegregated, the main argument is whether the curricula meet the needs of the blacks while having limited access to enroll in good schools.

The enrollment statistics may not be accurate because some students enrolled in specific colleges got a rejection, and because of the Brown decision, the Court can force the university to enroll them; some rejections may not get the attention of the Court if students do not follow the lawsuit. One of the weaknesses of the Brown decision is that racial justice is too heavily reliant on the courts (Patterson & Freehling, 2001). The courts have forced universities of colleges to accept black. It seems like it did not have enforcement. That gave the university administrators the freedom to deny black enrollment. The NAACP had to sue law schools to accept black students. In order words, the Brown decision let the school system practice the Laisser-Faire; there was no enforcement tool to tackle higher education in their enrollment process deeply. If it were a ceremonial law, colleges and universities would avoid violating it regarding the penalties to pay for not complying.

That violence was extreme, as the school board had closed schools rather than complying by supporting school segregation and denying blacks to School, violating equal protection (Bell, 2004). The Fourteenth Amendment of the Constitution, ratified in 1868 within the reconstruction era, stipulated that state-public bodies should not make or enforce laws abridging the “privilege or immunities” of United States Citizens (Patterson & Freehling, 2001: p. 15). The NAACP, The Fourteenth Amendment, and the Fund-supported graduate education and professional schools; There was racial discrimination against blacks in medical and law Schools for blacks to enroll as Marshall was forced to have separate-but-truly-equal black law and professional schools. They tended to create an inferior law school for black. One of the examples of a black humiliated, George McLaurin, a black graduate student in education, sat in a segregated anteroom at the University of Oklahoma in 1948 (Patterson & Freehling, 2001). Jim Crow always brings attention to inequalities by considering the system a social norm. Segregation is inherited from the discrimination system, which encourages the racialized and marginalized groups as those who should not benefit from social services and, worst-case scenario, a quality education. That was the era of injustice, which provoked riots.

The education of Blacks, whether in the South or North considered a threat to their white counterparts. White supremacists are hostile against the knowledge that blacks quested from the school system. They have driven the racialized patterns in three cities, Baltimore, New Haven, and Boston. This text emphasized the White opposition to black education. Public education raised even the white opposition; Black African Americans quested for education to improve their ci-

tizenship status. This piece lets to understand the link between race, citizenship, and schooling in the antebellum era. This narrative is a part of the African American dehumanization, which needs the attention of the researchers.

The colorblindness in the era of exclusion, the PWIs were intentionally a strategy to exclude blacks from the higher education arena. Before the Brown decision, there were no blacks holding faculty positions at PWIs, the Brown decision brought a change to that, but the percentage remains low; in 1980, the percentage of African Americans in all institutions was 4.3% (Harvey et al., 2004). Twenty years later, you can see an increase to 5.1 % and 3% at the PWIs, (Harvey et al., 2004). The persistence of this problem relies on the disparities in higher education, where the minorities of black which hold faculty and administrative positions are small. Another critical aspect is funding, which gives white supremacists the power to decide, and black students may be stuck in low-quality schools with poorly qualified teachers. Two white historians wrote, “Americans have, in a sense, built a nation upon the deception that they are a community of co-equal individuals participating co-equally in community affairs. Solid studies in Black History will put that illusion into perspective” (Biondi, 2012: p. 180). Black studies are strongly encouraged in perspective to fight for equal education where blacks could have the same opportunity for higher education.

## 10. Segregation Enforcement

Black student enrollment in higher education understands by scholars how education is a privilege rather than a right. This essay could not pass out the Brown decision to explain the influence of policies on black education in the U.S., emphasizing the “freedom of choice.” This policy pointed out directly the unconstitutional decision of the Plessy, which excluded black from education, and was against equal protection. Brown’s decision did not stop the university from denying students because of their skin color. The school and government officials did not support the Court’s decision in its enforcement. After this court decision in 1954, there was low progress because of the white resistance. Whites were reluctant to mix schools. In 1956 wrote by Herbert Ravenel Sass, in “Mixed Schools and Mixed Blood,” found that “mixed mating” was “disagreeable or even repugnant” (Patterson & Freehling, 2001: p. 87). They used dehumanizing solid words against black and violence in all the content of their conversation.

In both historical contexts, there was significant growth after the civil rights movement and affirmative action in the late 1960s, and minority progress from 1954 after the Brown decision. Students played a critical role in the conservation of black institutions such as HBCUs, and even 1960s and 70s, students enrolled in white institutions. However, the growth of black colleges significantly impacted black enrollment in higher education. This essay should address one question about blacks’ enrollment in higher education, the tracking system, and the quality of the children’s high schools. Success in higher education depends

on the quality of high school education. While the Brown of education emphasized desegregation, the quality of Schools for blacks should have critical attention, and even in mixing schools, blacks could receive a different treatment. Certain opponents believed that black children in racially mixed schools were often victimized by their white classmates and teachers, and black teachers were dismissed when schools were integrated (Douglas, 2005).

Solutions to provide to solve the problems of black education remain challenging. While white was resistant to a mixed school, this was not an avenue for blacks. There is a tracking system in the mixing schools, which may serve children as a roadblock to attending college. In 2001 in California, most minority schools were more than five times as likely to have uncertified teachers than their white counterparts in predominantly white schools (Carter & Welner, 2013). In about 20 percent of schools that serve minority students of color, more than one-fifth of teachers are uncertified (Carter & Welner, 2013). According to Du Bois' essay, they were sure that blacks in a mixed school dominated by whites would face lousy behavior and create a toxic environment for them (Patterson & Freehling, 2001). Resources have played a central role in education, as education links to capitalism.

Being black in America never ended the struggle to overcome adversity and hardship. It is required much work to prove that "you are not a social reject" (Zephir, 1996: p. 89). Scholars argue about the impact of the Brown decision. Michael J. Klarman has argued that serving instead reenergizes white racial consciousness while providing little integrated or improved education (Guinier, 2004: p. 97). The power of the white supremacist could not disappear by the law, while institutions, even black colleges, and universities controlled by whites. The law itself could not end racism; investing in school facilities, nutrition, and health for disadvantaged groups would emphasize equity. In a study 50 years post-Jim Crow, they found in Texas that schools are intensely segregated and serve a 90% or more significant population of Black enrollment in two-year colleges. The Brown decision was about social progress, but the white supremacist always opposed education for blacks. As Justice Harlan had said in Plessy, it is stigmatization with a "badge of inferiority" (Patterson & Freehling, 2001: p. 11). In 1960, there were only 227,000 blacks enrolled in higher education. Black students are still prosecuted for their involvement in protestations for their right to higher education. More than one hundred students had been expelled and put on probation at Black colleges in the process of the all-whiteboard to stop student demonstrators at Alabama State College (Cole, 2020).

Even the Supreme Court passed the law, but its implications remained challenges to the power of the school officials who would like to maintain the statute quo. The challenge of the application of desegregation policies and court decisions on schools. Scholars understood and expressed the challenges of blacks having access to quality schools located in different locations where they live. The school segregation limited black African Americans to their space, supported by the court decision "Separate but equal" (Douglas, 2005). Despite state

anti-segregation laws in the North, school segregation continued to increase decades before World War I (Danns, 2008). In 1969, the court decision in North Carolina (Fourth Circuit) included Centreville; even though the desegregation order, the problem of black African Americans' education will not disappear with the stroke of law makes' pen (McCullough-Garrett, 1993). In Nashville, before and after Brown, the city's planners and school administrators-built schools to favor segregated White spaces in suburban advantages while leaving black students in overcrowded urban schools (Erickson, 2012).

## 11. Mixed Race Issues in the U.S. and the Education System

Following the Brown decision, the white hostility as so-called Southern whites fought back, and one example was Brown II, the killing of Emmett Till in Mississippi (Patterson & Freehling, 2001). There was some concern about sexual concerns regarding the Till case between white and black; on his travel, he got sex with white women, Till did not understand the race in the South, and some of those racists argued that black people had a less developed moral sense than whites (Patterson & Freehling, 2001). Whites were reluctant and hostile to mixing schools. In an article called Atlantic Monthly in November 1956 written by Herbert Ravenel Sass, "Mixed Schools and Mixed Blood," they found that "mixed mating" was "disagreeable or even repugnant," (Patterson, & Freehling, 2001: p. 87). To enforce resistance against the Brown decision in the South, government officials titled the Brown court decision the supporting of pro-communist agitators and other enemies of the American form of government (Patterson, & Freehling, 2001). Scholars analyzed Brown and Brown II in the context of the white South that reactions depend on the decisions of local white leaders.

The white officials consider the Brown decision a violation of the state's rights. Carters and others argued that school segregation is a symptom, not a disease, and the actual sickness is the country's foundation for maintaining white superiority (Bell, 2004). According to specific approaches, "Once institutionalized, segregation is a durable and expensive system that tends to be expected" (Carter & Welner, 2013: p. 42). The black movement and black scholars fought continuously not to come back. Bell wrote in 1986: "rather than beat our heads against the wall seeking pupil-desegregation orders the courts were unwilling to enter or enforce, we could have organized parents and communities to ensure effective implementation for the equal-funding and equal representation mandates" (Douglas, 2005). This argument from Bell supports that the Brown decision missed the legal enforcement to deter college and university administrators from denying blacks enrollment.

After the Brown II decision, the NAACP still had many things to be done. Courts forced certain states to develop a desegregation plan, which was challenging. Suppose most public service agents are whites; how do they overcome those challenges? In the History of the Arlington struggle of blacks, Dorothy

Hamm, sitting with teachers and students, mentioned that this was the first time, after forty years, they could see themselves with the panelists in a classroom rather than in the courtroom (Morris, 2001: p. 360). Great migration urged government officials to enforce segregation even in states with school desegregation policies. There was an increase in Northern School segregation with the migration of Southern blacks (Douglas, 2005). Other states followed this strategy as Northern New Jersey communities, which had integrated schools, reinforced school segregation with the increase in the black population (Danns, 2008). The strategy of school segregation kept spreading like a pandemic, that I heard the news that school segregation increased more and more among states.

## 12. Challenging Behind the Solutions

According to Gallup, school segregation caused more difficulties than worth (Bell, 2004: p. 112). Because of the disproportionality of white teachers compared to black students, parents had some issues, as they may not involve in school activities, probably schools can be far from where they lived. One of the biggest concerns and frustration about the integration school is the “tracking system.” Several decades after the Brown decision, blacks continued to attend segregated schools. The Brown decision was a court decision. It cannot change the environment. In certain cities, before and after Brown, city planners and School administrators-built schools that favored segregated White spaces in suburban advantages while leaving black students in urban, crowded, poor schools (Erickson, 2012). However, many times people live racially segregated.

School integration as a solution to school segregation is challenging. In 1993, Legal scholar Alex Johnson wrote an article subtitled “Why Integrationism Fails African Americans Again,” in which he suggested that “Brown v. Board of Education and its explicit adoption” was “a mistake, (Douglas, 2005: p. 279). Many scholars argue about school integration. One of the litigators from NAACP, Robert Carter, stated” While we fashioned Brown on the theory that equal education and integrated education were the same, the goal was not integration. However, equal education opportunity, Brown has been satisfied if equal education can be achieved without integration (Douglas, 2005).

Since education is a white privilege, it is difficult to change the supremacist around this idea. Many things are in their favor regarding the white resistance because mainly the higher education governs by whites. In the Zephir book, some discrimination statements were found: “This is a white country. To be Black, not to be at home”. “I recall on a T.V. show where a white person suggested that all Blacks should go back to Africa.” So, the Blacks need to be prepared five times better than their White counterpart before they can be on an equal footing. According to a study, no single informant believed that progress and prosperity for blacks could be achieved without struggling and pointing out considerable efforts (Zephir, 1996). Blacks were enslaved to build universities that; they were not allowed to attend. The History of higher education is a histo-

ry of violence, which caused the lives of many blacks to overcome racism in higher education.

The Brown V. Board of education encountered significant challenges, as changing policies could not change the school environment and officials' behaviors. This essay intended to explain post of Brown's decisions explain the complexity of their application. In this essay, the works of the scholars responded to the pertinence of challenging policies to provide education for blacks. Further research may explain how parents are skeptical about racially mixed schools regarding the fear of white teachers' behaviors against their children.

### 13. School Segregation and Racially Mixed School

The problem is complex for both school segregation and racially mixed schools unless they provide treatment regarding the needs of the black students. In [Condrón et al. \(2013\)](#) study, the authors emphasized a correlation between schools and neighborhoods to generate unequal opportunities, less qualified teachers, and high teacher turnover. The argument stated above in the post-Brown decision can explain one of the challenges to fighting school segregation in the residential around 1997; a Gallup Poll revealed that 76 percent of black college graduates had doubts about race relations ([Patterson & Freehling, 2001](#)). However, around the 1990s, exclusion in higher education was less common ([Patterson & Freehling, 2001](#)). The 1990s increased by 259 percent, while it was 50 percent in the 1960s ([Cross & Slater, 1999](#)). That was a considerable improvement, regardless challenges the Brown decision faced.

In sum, this essay set the tone regarding the significant challenges of black students in higher education, and policies alone could not resolve the problem. The white resistance engendered the progress of black in higher education despite the Brown V. Board of Education. Brown V. Board of Education is a court decision, and there was a lack of enforcement of this decision, and black students continued to be denied enrollment in higher education. Action should be taken regarding the poor neighborhood to change their social-economic status. Do they have leaders accountable for resolving those situations? Could the black movement push leaders to understand the real problem? The minorities need some help to develop economically. The Brown V. Board of Education faced major roadblocks by the dominant groups, which had an impact on the education of blacks in higher education.

The power of the white supremacist stresses their economy, which gives them the power to make decisions or influence those who have the power to make decisions. It will take some time, even never talk about segregation, to separate blacks from whites, but the De Facto Segregation may be there. Despite challenges encountered by the Brown decision, African American enrollment in higher education made History start in the late 1960s and exploded following years. Leaders or activists should focus more on the cause than the effects in many circumstances. Brown v. Board of Education revolutionizes American

History in an educational context. The Brown decision needed the involvement of parents and communities to advocate for equal funding to provide better education to their kids where they live and promote higher education enrollment. The Brown V. Board of education itself would continue to struggle under the power of the white supremacist without the accountability of all the stakeholders, such as parents, educators, scholars, and education leaders. Educated blacks are a threat to the wealth of the dominant groups. This work helps to understand that education is a way for blacks to escape racial oppression which is supported by the work of Givens (2021) in the fugitive pedagogy as a strategy for teachers and students today.

### Conflicts of Interest

The author declares no conflicts of interest regarding the publication of this paper.

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