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FORWARD

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provost@arcadia.edu
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Between 1980 and 2014, the number of women imprisoned in the United States increased to a rate that is fifty percent higher than that of men. Regardless of this steep increase, the experiences of female prisoners, past and present, have largely been ignored.¹ Mass incarceration is a dominant conversation in scholarly and public discourse, yet criminological studies often ignore the relationship between gender and race. A stark difference between the incarceration rates of African American women and white women remains. Following the abolition of slavery in 1865, the state prison system in United States underwent a major transformation and the convict lease system was established. The legacies of the overrepresentation, intense labor, and ill-treatment of black women in the penal system are still evident in the system today. After the abolition of slavery, the number of incarcerated black women increased because the U.S. prison system developed to replicate and reinforce the gendered oppressions and social control specific to black women that had previously existed for slaves. This paper will consider the oppression of black women in the American South convict lease system through the lens of labor exploitation.

The marginalization of black women in criminological discourse shows that mainstream perspectives disregard the effect of gender on the relationship between race and crime. Criminologist Gregg Barak argues that culturally white and male bias in criminology results in the suppression of important historical and social contexts and female experiences, consequently leading to an inaccurate conceptualization of crime.² Monolithic pedagogical constructions serve to reinforce race, gender, and class conflicts in the United States. As a result, many Africana Studies scholars emphasize the importance of “placin[g] black women at the center of our [historical] narratives,” even though mainstream discourses often marginalize the experience of black women.³ Dominant, racialized societal ideals about womanhood, along with structural racism present in American institutions, bleeds into the modern U.S. criminal justice system. A combination of unequal access to justice for black victims and disparities in arrests and sentencing for black female offenders suggests the treatment of black women in the criminal justice system is inextricably intertwined with both gender and race. Hence, it is important to examine gender in conjunction with race when studying the history of prisons in the United States.

This paper examines how interlocking oppressions of race and gender meant that black women who interacted with the criminal justice system were more likely than white women to be leased convicts. Comparing black

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women to white women does not imply the existence of a racial binary limited to white and black categories. Furthermore, demographic changes caused by immigration and intermarriage changed the conception of race over time. Nonetheless, in order to understand the racial history of the United States, it is important to compare the experiences of black women to those of white women because the popular imagination constructs racial issues around the black/white binary.

A brief overview of the historical legacy of slavery contextualizes the complicated nature of black women’s experiences with state penal institutions. The political economist Jo Flateau claims Atlantic slavery can be thought of as a metaphor for the modern criminal justice system. Flateau asserts, “metaphorically, the criminal justice pipeline is like a slave ship, transporting human cargo along interstate triangular trade routes from Black and Brown communities.”

Police precincts, detention centers, and courtrooms can be thought of as the middle passage, before these individuals are placed in bondage at downstate jails or upstate prisons. Flateau contends that released convicts return to their communities as “unrehabilitated escapees” who, like runaway slaves, will eventually be returned to their captivity by the State. This assertion highlights the institutionalized nature of the criminal justice. Flateau concludes that the prison pipeline is “a vicious recidivist cycle” similar to slavery. Flateau’s allusion to slavery is apt considering the history of atrocities committed against black people in the U.S. Therefore, understanding the historical context of black women since the institution of slavery in the U.S. aids our understanding of the present-day criminal justice system.

Adam Hirsch asserts, “the penitentiary arose in the age of slavery,” which illustrates that the presence of black people in the U.S. had an important role within the development of the prison system. Slaves were usually punished by their owners outside of the state justice system due to the inherent heteronomous nature of chattel slavery. In the lower South, before the abolition of slavery, virtually none of those imprisoned were slaves. However, even after emancipation occurred, white Americans possessed a monopoly of social and political power over the black caste, a racially subjugated group. In order to control the black population, the state incarcerated an increasing number of black women following abolition. Hence, the rise of the penitentiary system occurred alongside changing attitudes towards crime and punishment, connected to changing social, economic and political conditions in society. Once the Emancipation Proclamation came into effect, according to the U.S. Department of Justice, the number of prisoners rose from 60.7 per 100,000 in 1860 to 85.3 per 100,000 in 1870. The exponential increase in the number of prisoners suggests that the 13th Amendment allowed southern states to resolve their economic concerns regarding the abolition of slavery by establishing the convict lease system.

Often referred to as “slavery by another name,” the convict lease system replenished the workforce for former plantation owners. Consequently, “the most resonant symbol of the

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2 Ibid.
6 Margaret Werner Cahalan, “Historical Corrections Statistics in the United States, 1850 – 1984”, U.S. Department of Justice
slave plantation – the clanking of chains – echoed just as loudly from within prison walls.”

The formation of the convict lease system replicated the gendered oppression, racism, labor exploitation, and social control that had previously existed for enslaved black women. By 1880, a third of the black population in the South had been imprisoned - though how many of these prisoners were women is unclear. In the South, the social arrangements of race, gender, and class created in the aftermath of the Civil War influenced the dispatch of punishment and justice. Under the widespread convict lease system in Southern states, convicts were leased out for labor to private parties who were responsible for housing, feeding, and clothing them. Many historians blame the convict lease systems’ popularity on the southern state governments’ fiscal insolvency during Reconstruction. Convict leasing provided a source of labor to industrialists or plantation owners in the South who had remained involved in the international market economy after the Civil War but could no longer use slaves for cheap labor. Hence, after 1865, black labor exploitation continued by funneling disproportionate numbers of black people into the prison system. Despite a smaller financial investment, the private parties participating in the system, the “leasers,” found their profits from convict labor were comparable to slave labor. Unfortunately, this meant leasers had no incentive to treat convict laborers better than slaves. Yet again, the law failed to protect the liberties of black women, and in many cases actively sought to subjugate them. Thus, the first instance of black women performing prison labor can be attributed to the establishment of the convict lease system, not the privatization of modern day prisons.

Black Codes and Jim Crow laws further subjected black women to state violence and criminalization, as societal devaluation of black womanhood meant black women were not included in the protected class of white women. Southern society conceptualized black femininity in direct opposition to the white-washed ideals of True Womanhood. During the era of slavery, “the black woman was treated with no greater compassion and with no less severity than her man.” As such, negative constructions of black womanhood meant there were no gender distinctions within black labor. State authorities used the stereotypes of black womanhood created during slavery to rationalize forcing black female prisoners to labor on both sides of the gender divide. As a result, slavery’s economic logic was replicated by the Jim Crow carceral regime.

Georgia and Alabama, though both in the South, had different attitudes towards black women’s labor. In 1908, Georgia implemented a domestic sphere within the carceral system that forced black women to work as domestic servants while serving parole. However, the extremely diverse laboring expectations of Georgia’s convict women contrasts the exclusively domestic vocational roles of Alabama’s female inmates. Despite the separation in labor expectations, the penal system in both Alabama and Georgia aligned with the racial and gendered beliefs of the time. Georgia treated black women from a racial perspective that assumed their blackness made them less

11Hirsch, The Rise of the Penitentiary, 72
14Angela Y. Davis, Angela Davis, “Reflections on the Black Woman’s Role in the Community of Slaves” (1998), 117.
than women, whereas Alabama’s gendered perspectives influenced the state’s treatment of female inmates. Ultimately, the Southern “carceral regime [was] a key infrastructure that produced and reinforced racialized constructions of gender and gendered divisions of labor.”

Black women faced a variety of oppressions due to the intersection of their gender and race within the Southern convict lease system. Gendered racial terror in the south was the genesis of women’s interactions with the criminal justice system. The end of the Reconstruction era in 1877 to the beginning of the Great Depression in 1926 is also known as the “Lynching era”. An estimated 2,462 African Americans were killed and 79% of lynching crimes occurred in the southern states. It is clear that “Southern chivalry [drew] no line of sex” as African American women were also victims of lynching. 3% of victims were female and though this statistic is comparatively small, it highlights that the justice system did not protect black women from violence. Mary Turner exemplifies the experiences of black women with the law in the 19th century. Turner vowed to “swear out warrants to bring her husband’s murderers to justice,” yet white supremacists killed her with no legal reprisals. Ida B. Wells, a prominent anti-lynching crusader during the 1890s, was forced into exile after writing Southern Horrors, a piece which claimed the “Afro-American race is more sinned against than sinning.” One example which Wells writes about is seventeen-year-old Lillie Bailey, a white girl in the Memphis Women Refuge who gave birth to a baby fathered by a black man. Wells writes that in the Memphis Leger she was referred to as the “mother of a little coon” and that the “truth [of the baby’s father] might reveal a fearful depravity.”

Bailey’s ultimate expulsion from the Women’s Refuge center and her treatment by the press illustrates how general racism influenced the social control of all women living in the American South.

Sexual and medical violence is another example of racial and gendered oppressions that black women experienced at convict labor camps. However, issues specific to women in the prison system are often ignored because criminologists have predominantly used masculinist perspectives in criminology to analyze convict labor camps. Unlike slavery, imprisonment was not inheritable; therefore, the shift from slavery to imprisonment meant that the image of black motherhood was negatively reconstituted. Black female reproduction was no longer desirable because “the New South fiscal model saw pregnancy and childbirth as threats to economic progress and productivity.”

An article published in the St. Louis Globe-Democrat, in August 1887 described the children of black mothers as the “worst features of the convict labor system.”

Additionally, the coerced sterilization of black women was associated with the eugenics movement and its white supremacist ideology. Eugenics is a pseudoscience, which seeks to improve the genetic characteristics of the human population through controlled breeding. Many sterilization advocates argued reproductive surgeries were a necessary public health intervention that would protect society from the propagation of deleterious genes and mitigate the economic costs of managing.

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17 Haley, No Mercy Here, 53.
21 Ibid.
23 Haley, No Mercy Here, 112.
“degenerate stock”. Therefore, the sterilization of black people within the prison system illustrates the long history of the state’s association between the social control of black people and the economy. Due to the limited control incarcerated black women had over their bodies, state-sponsored reproductive oppressions became prevalent. Sterilization laws were justified by racist evolutionary theories that claimed traits such as criminality, feeblemindedness, and sexual deviance, were completely heredity. Given that these characteristics were overwhelmingly associated with African Americans, it is unsurprising that black women were disproportionately subjected to sterilization procedures, often without their knowledge or consent.

Many African American public figures, such as W.E.B Du Bois and Malcolm X, contested the eugenics movement by attributing rising incarceration rates on social inequality. Du Bois put the onus on black individuals as he attributed crime to a rebellion of social disorder. Though Du Bois combats racial essentialism, his individualized interpretation of black crime creates disunity within the black community as it separates the non-criminal blacks from the criminal blacks. In contrast, black community leaders at the Ninth Annual Atlanta Conference argued crime was a symptom of social disorder and racial disparities in crime were a reflection of structural issues. Ultimately, non-essentialist arguments regarding the cause of the disproportionate incarceration of African Americans gained limited traction and had a minimal impact on the predominately white institution of the criminal justice system. The eugenics movement in the U.S. remained very influential prior to the use of its doctrines by Nazis during World War II. However, in prisons post World War II, medical neglect was still present, especially for African American women.

Carceral constructions of black female deviance meant that black women were unfairly treated compared to white women in the convict lease system. The ideals of True Womanhood, also referred to as the Cult of Domesticity, embodied piety, submission, domesticity, and sexual purity. Black women were excluded from the ideals of True Womanhood and its benefits because “black womanhood and white womanhood were represented with diametrically opposed sexualities.” Hence, black women’s experiences of punishment or prison in the South were as subjects outside of the protected category of women. In stark contrast to the rising number of black female prisoners, the imprisonment of white woman was rare, and they were almost never sent to convict lease camps. This phenomenon can be attributed to the necessity of controlling black women through law in response to the abolition of slavery. It is equally important to consider the intersection of socio-economic class alongside gender. For example, though fines for municipal offenses like disorderly conduct were comparable across racial and gender lines, white women were more likely to be able to pay their fines than black women. Nonetheless, there were sentencing disparities probably influenced by mainstream society’s designation of “a pathological uniformity onto black women as a group, such that every black woman

24Ibid.
27 African American Classics in Criminology & Criminal Justice.
29 Haley, No Mercy Here, 4.
30 Ibid., 31.
regardless of her income, occupation, or education became the embodiment of deviance.”

Two Georgia women accused of murder demonstrate the difference between the representations of black and white female deviance. Eliza Cobb, a twenty-two-year-old black woman, was accused of infanticide, convicted, and sent to a convict lease camp. Though the evidence against her was “wholly circumstantial,” she could not “combat the burden of guilt that guided all-white juries in infanticide cases.” In juxtaposition, in 1923 when Martha Gault, a young white woman, was charged with assault with intent to murder, the judge considered Gault worthy of redemption despite her guilt. Whereas Cobb’s blackness meant her criminality was considered innate, Gault’s whiteness meant her deviance was seen to be due to bad male influences. The comparison of Cobb and Gault demonstrates that the criminal justice system strictly adhered to the racial and gendered conventions from the ideology of True Womanhood. In fact, the racial construction of womanhood meant courts only considered the existence of female criminality when more African American women entered the prison system after emancipation. Legislators in Alabama, when confronted with female criminality, “had entertained the hope that there was not a female in Alabama, so destitute of virtue and honor as to commit an act sufficiently heinous as to justify the courts...committing one to the penitentiary.”

The law reflected these views and authorities did not use split gender correctional facilities until the 1870s. Hence, although the separation between black and white woman-hood existed prior to abolition, the convict lease system reinforced the division between black and white women and enshrined the unjust treatment black women experienced during slavery into criminal proceedings.

Ultimately, the convict lease system was one of the many developments in the criminal justice system which used economic disparities and forced labor as a mode of social control against black women. The convict lease system was the direct result of slavery and its abolition. Following the economic instability of the Civil War, the prison system was an institution that was still legal, which allowed the state to continue to subjugate black southern women and maintain white supremacy. The convict lease system allowed the state to combat the economic and political threat that a newly freed black population posed to the Southern states. The evolution of the penal system over time led to the creation of what is now known as the prison industrial complex. Whereas the penitentiary is an institution, the prison industrial complex refers to a system where the interests of government and industry use surveillance, policing, and imprisonment in order to solve economic, social, and political problems. Within the prison industrial complex, inmates are no longer simply used as labor, instead “they themselves are the raw materials facilitating the profitability and expansion of the Prison Industrial Complex.”

Similar to convict leasing, both state and private corporations collaborate in order to profit from the prison system. Prisons serve as a source of employment for nearby communities, and private corporations profit from the construction and management of prisons. Hence, although the unjust labor exploitation of black women was more apparent in the convict lease system, twentieth and twenty-first century prisons continue to replicate the racial and gendered oppression present during slavery and exploit women economically.

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31 Higginbotham, Righteous Discontent, 190.
32 Haley, No Mercy Here, 18
33 Ibid., 22
34 Ayers, Vengeance and Justice, 63.
An examination of black female incarceration and the historical development of prisons in the U.S. suggests that the number of incarcerated black women increased as a result of the establishment of the convict lease system. This system systematically replicated and reinforced the racism, sexism, and social control that was previously enforced against enslaved black women. Despite the extensive reforms and changes to the penal system since convict leasing, the social control and subjugation of African American women has remained consistent in the criminal justice system overtime. In her extensive scholarship about African Americans and criminality, the scholar Angela Davis argues criminalization has historically been and continues to be a fundamental tool that maintains anti-black social, political, and economic control. Black women’s labor exploitation continued through the transformations in the prison system. Consequently, a large segment of the construction and development of postbellum industries in the South can be attributed to them. At the height of the Atlantic slave trade, the South was able to keep the majority of the impoverished under control, hence “the South, it would seem, simply had little objective or subjective need to build penitentiaries.”37 However, emancipation meant Southern society’s traditional capitalist norms began to disintegrate. It is notable that the convict lease and later successive systems of imprisonment such as the chain gang and the prison industrial complex originated from extensive economic and social changes. Post-Emancipation legislation and the separation between white and black womanhood all worked in tandem to cause the overrepresentation of black women in southern prisons and allow the state to exploit their labor for profit. The economic dimension of incarceration demonstrates that the penitentiary replicated several other elements of slavery alongside the removal of individual liberty.

Examining central issues in African American legal and political history is important as it gives a more nuanced analysis of the contemporary problem of mass incarceration of black women. As Mariame Kaba said, “the past bleeds into the present.” Today, the racial disparity of the prison population is the most conspicuous continuity in the history of the convict lease system in southern states. Though an analysis of the convict lease system is only a small segment of prison history, it is significant as it contextualizes the present-day epidemic of mass imprisonment. The Southern penal system was central to the production of Jim Crow modernity in the U.S. prison system as a whole. Racist laws and legislation, judicial leniency towards whites, and a desire to profit at the expense of the black population in the U.S. were all factors which led to the racialized population imbalance in prisons.

To conclude, as the interacting elements of economics, class, sexuality, politics, gender and race have caused mass incarceration to become integral to cultural life in the U.S., there is no simple solution. However, by considering the history of the U.S. prison system, the general public will be inspired to question their assumptions about prisons. Angela Davis observed that “there is reluctance to face the realities hidden within them...Thus, the prison is present in our lives and, at the same time, it is absent from our lives.”38 Prisons need to be brought to the forefront of the public consciousness in order for extensive reforms within each stage of the criminal justice system to occur. Restructuring is necessary within every aspect of the penal institution. Linking black women in the convict lease system to prisoners today illustrates negative aspects of society, such as institutional racism and sexism, that continue to be embedded in the prison system.

37 Ayers, Vengeance and Justice, 34.
38 Angela Y. Davis, Are Prisons Obsolete?, Open Media Book (New York: Seven Stories Press, 2003), 15.
Consequently, the prison abolitionist movement argues prisons should be completely abolished. A less radical solution to remove the inequalities present in prisons without abandoning prisons is to first destroy, then completely reconstruct, the entire penal institution. The Roman philosopher George Santayana stated those who cannot remember their past are condemned to repeat it.\textsuperscript{39} Thus, though there are no simple solutions that will solve the plight of African American female prisoners, at the very least a historical analysis of both exploitation and resistance within the convict lease system will serve as a tangible starting point to inform present day criminal reform and legislative changes to specifically aid black women.

\textsuperscript{39} George Santayana, \textit{The Life of Reason: The Phases of Human Progress} (Amherst, N.Y.: Prometheus Books, 1905).


Affirmative Action has been the cause of legal debate since its inception in the early 1960s. Though some view these policies as a means of equaling the playing field between the minority and the majority, there are those who see these policies as greatly disadvantaging the majority as well. This is exactly the scenario which brought about the Supreme Court case of Abigail Noel Fisher v. University of Texas at Austin. Abigail Fisher applied to the University of Texas and was denied admission, something she felt was due to the University’s affirmative action policies. The Court, in theory, has used quasi-strict scrutiny to determine whether or not the policies adopted by the various universities or organizations are constitutional. This is the test that should be used in the Court’s opinion of Fisher v. University of Texas at Austin, and this test will further the constitutionality of the University of Texas’ AI/PAI system.

Before 1997, the in-state admissions process of the University of Texas at Austin (UT) considered only two factors: (1) an applicant’s Academic Index (AI), which was computed from standardized test scores and high school class rank; and (2) the applicant’s race. Race was often a “controlling factor in admissions.” (App. at 5) (citing, App. 162a.). What this means is that, often, University’s would grant admission simply due to the race of the applicants, possibly regardless of academic standing or standardized test scores. The use of race in the PAI system ended with the Fifth Circuit Court’s decision in Hopwood v Texas, 78 F.3d. 932 (5th Cir. 1996). In an effort to maintain the rates of minority enrollment it had before the Hopwood decision was passed, the University of Texas decided to adjust its criteria for admission. In 1997, UT developed its AI-based admissions calculus with a new Personal Achievement Index (PAI).

The PAI system consisted of a weighted average of two written essays and a “personal achievement score.” The PAI “measures a student’s leadership and work experience, awards, extracurricular activities, community service,” and “special circumstances.” These special circumstances—including being raised in a single-parent, non-English speaking, or socioeconomically disadvantaged home environment or assuming significant family responsibilities—tended to “disproportionately affect minority candidates.” Fisher v. Univ. of Tex. at Austin, 645 F. Supp. 2d 587, 591 (W.D. Tex. 2009), aff’d, 631 F.3d 213 (5th Cir. 2011)

Coexistent with the PAI system created by UT, the Texas Legislature passed the Top 10% law as their own response to the Hopwood decision. This law required UT to grant automatic admission to any Texas high school student graduating in the top 10% of their class. This plan took effect for the first time in...
the 1998 admissions cycle. In addition to the Top 10% law, UT's AI/PAI system would be used to (1) fill those seats in the entering class that were not taken up by those admitted through the Top 10% and (2) determine program placement for all students of the incoming freshman class. The combined effect of the Top 10% Law and the AI/PAI system steadily increased African-American and Hispanic admissions. In 1999, UT announced that its “enrollment levels for African American and Hispanic freshman... returned to those of 1996, the year before the Hopwood decision.”

On June 23, 2003, the same day the Supreme Court announced its decision in Grutter v. Bollinger¹, UT announced that it would “modify its admission procedures to ... combine the benefits of the Top 10% Law with affirmative action programs that can produce even greater diversity.” Grutter v. Bollinger, 539 U.S. 306, (2003). This modification was a proposal, created in 2004, to re-consider race in the admissions process, and it was approved by the University’s Board of Regents that same year. This proposal was set forth for two reasons (1) to overcome “significant differences between the racial and ethnic makeup of [UT's] undergraduate population and the state’s population and (2) to achieve classroom diversity. The 2004 Proposal was designed so that UT could achieve the same interest that this Court had just reaffirmed was compelling in Grutter—the “educational values of diversity.”

UT determined that the study and the demographic imbalance between its freshman class and the overall demographic of the state showed that they had not yet met a “critical mass” of diversity. The 2004 Proposal also claimed that although the race-neutral policies—such as the Top 10% law—had been useful in obtaining a strong academic student body, it failed to improve to overall diversity in the classroom. The proposal was approved by the Regents and in 2004, UT reintroduced racial preferences by adding race to the list of possible “special circumstances” that make up a major component of the PAI. This policy was first introduced with the admissions class of 2005.

Abigail Noel Fisher was a white female from the state of Texas. She applied for undergraduate admission to the University of Texas in 2008. Fisher was not in the top ten percent of her class, which would have guaranteed her admission into the school under the Top 10% law. Because of this, she was forced to compete for admission with other non-Top Ten Percent in-state applicants. The University of Texas denied Fisher’s application. She then enrolled at, and graduated from, Louisiana State University (LSU). After being denied admission to UT in 2008, Fisher filed suit in the Western District of Texas for damages and injunctive relief to challenge UT’s use of race in admissions under the Equal Protection Clause of the Fourteenth Amendment and Title IV of the Civil Rights Act of 1964.

The Equal Protection Clause of the 14th Amendment to the Constitution provides that “no State shall deny to any person within its jurisdiction the equal protection of the laws.” U.S. CONST., AMDT. 14 § 2. When this Court analyzes a case under Equal Protection it must ask itself four things (1) How is the government drawing a distinction among people, (2) How does it discriminate?, (3) What level of scrutiny applies?, and (4) Does government action need that level of scrutiny? The third question provides the Supreme Court’s root for analysis regarding classifications that distinguish protected classes.

¹Grutter v. Bollinger upheld the use of affirmative action in collegiate admissions. The Court was asked to review whether the admissions policies used by the University of Michigan, in which race was allowed to be considered as a factor of admissions, was constitutional under the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution.
The Court has three different levels of scrutiny that it uses to review state or federal distinctions of classes, and each of these levels has its own requirements that a statute, policy, or law must satisfy in order to be held constitutional. The Supreme Court of the United States has consistently held that any discrimination by the government based on race “must be analyzed by a reviewing court under strict scrutiny.” *Adarand Constructors, Inc. v. Peña*, 515 U.S. 200, 227 (1995). Thus, the statute must serve a compelling state interest and be narrowly tailored to that interest. Strict scrutiny is applied to all racial classifications in order to “smoke out” illegitimate uses of race by assuring that [government] is pursuing a goal important enough to warrant the use of a highly suspect tool.” *Richmond v. J.A. Croson Co.*, 488 U.S. 469, 493, 109 S.Ct. 706, 102 L.Ed.2d 854 (1989).

Although all uses of race-based discrimination by the government are to be analyzed under strict scrutiny, not every action by the government is invalidated by this analysis. The fact that a certain law may be racially discriminatory “says nothing about the ultimate validity of any particular law; that determination is the job of the court applying strict scrutiny.” *Peña*, 515 U.S. at 230, 115 S.Ct. 2097. As long as the law or statute serves a compelling state interest and is narrowly tailored to that interest, it will pass strict scrutiny every time and will be considered a valid law under the constitutional guarantee of equal protection.

For the past two decades, however, this Court has been applying another form of scrutiny in its decisions in Affirmative Action cases, such as *Grutter* and *Bakke*. This form, which has often been labeled quasi-strict scrutiny, does not look into whether the issue is narrowly tailored. Rather, so long as the Affirmative Action program serves to promote diversity but not create a direct, but-for causal link between the suspect class and the underlying benefits sought, then the discrimination serves a compelling state interest and the means are substantially related to that interest. Quasi-strict scrutiny will only apply to Affirmative Action cases where the discrimination is being used facially. For example, the Top 10% plan would not fall under this level of scrutiny since it applies to all races, not one suspect class. The Top 10% plan may have this result, and may very well have this purpose, but because this affects all races across the board, is neutral on its face, and benefits all suspect classes and/or races, then it shall not be above rational relation.

Under strict scrutiny alone, which requires the statute in question to serve a compelling state interest and also be narrowly tailored, the AI/PAI system created by UT would fail under the requirement for narrow tailoring. Narrowly tailored requires that there be no other way the objective could be reached. In the context of Affirmative Action, being narrowly tailored is possible in theory but impossible in action, as Affirmative Action applies to all colleges and universities across the United States, each with their varying size and popularity. What may be considered a “diversity goal” at one college or university may not be the same at another. Here, the Top 10% law was created to achieve diversity at UT, as was the AI/PAI system created by UT themselves. These two systems were created to achieve the goal of diversity at UT, yet neither can pass muster as narrowly tailored because neither one is the only way to achieve diversity. While never formally pronounced, this alternative level of quasi-scrutiny has in theory been applied in the previous rulings of this Court, such as *Bakke* and *Grutter*, and we will be well served to apply it in this case.
The Court believes that under quasi-strict scrutiny, the requirement that the process must serve a compelling state or government interest is met by the AI/PAI system created by UT. As stated above, this Court has endorsed Justice Powell’s view, in Grutter specifically, that “student body diversity is a compelling state interest that can justify the use of race in university admissions.” Grutter v. Bollinger, 539 U.S. 306, 325 (2003). Petitioner argues that UT never clearly articulated a compelling interest in educational diversity. As Respondent points out, “UT simply seeks minority students with different backgrounds, different experiences, and different perspectives. That is precisely the diversity that this Court has held universities have a compelling interest in seeking.” (Rep. at 15). In light of this, the Court endorses Justice Powell’s view in Marks, and on that endorsement, agrees with the Respondent’s point on the compelling interest of the University. This Court, as well as other institutions in this country, has noted that student body diversity, in and of itself, is a compelling state interest. This is due to the added benefits, some of which UT even mentioned in their 2004 Proposal, that are accomplished with diversity. Some of these benefits, as mentioned by UT itself, of the AI/PAI system is that it seeks to “provide an educational setting that fosters cross-racial understanding, provides enlightened discussion and learning, and prepares students to function in an increasingly diverse workforce and society”. (Rep. at 26).

The interest of UT, as stated above, is the overall interest in student body diversity at the university. When the 2004 Proposal was first considered, UT ran a study throughout the university in order to assess their current levels of diversity. According to the Respondent, “UT’s study showed that there were zero or one African-American students in 90% of the undergraduate classrooms of the most typical size (5-24 students). The classroom diversity study itself stated that UT’s objective was the educational benefits of diversity, not some discrete “classroom diversity’ target”. (Rep. at 26, 27). UT is a large university in Texas, with many classrooms that fall within this “most typical size” that was surveyed. For there to be one, and sometimes not even one, African-American student in 90% of the classrooms is a grave cause for concern for UT and justifies a compelling interest for the university. We therefore find that this system passes the compelling interest requirement, and turn to consideration of substantial relation and the but-for test.

From the very beginning, it is evident that this system created by UT is substantially related to the interest of diversity at the University. Through the consideration of race in the application process, as well as the “special circumstances” aspect, it is evident that these aspects were implemented with the effect and purpose of increasing diversity at UT. Petitioner argues that “where racial classifications have only a ‘minimal impact’ in advancing the compelling interest, it ‘casts doubt on the necessity of using such classifications’ in the first place and demonstrates that race-neutral alternatives would have worked about as well. (App. at 46-47) (citing, Parents Involved in Community Schools v. Seattle School District No. 1, 551 U.S. 701. at 734 (2007). We find this argument unpersuasive, and rather endorse Judge Garza’s view, in his dissent in the Fifth Circuit, that “diversity cannot be gauged with reference to numbers alone,” and “a race-conscious admissions plan need not have a ‘dramatic or lopsided impact’ on minority enrollment numbers to survive strict scrutiny”.

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Finally, when considering the but-for test, UT’s policy must make sure that it serves to promote diversity, which this Court has already stated it does, but does not create a direct, but-for causal link between the suspect class and the underlying benefits sought. That benefit in this case being admission into the University of Texas. As the Respondent, UT, points out, its admissions process is “not all about race. UT appreciates that every student brings a lot of other diversity pieces with them. Race...simply provides a contextual background for the student’s achievements... The point of holistic review is that [s]tudents ... are more than just their race.” (Rep. at 34). Rather than using race in a situation where there is a direct causal link between the suspect class and the underlying benefits sought, such as the quota system, it is nothing more than an extra consideration for admission professionals to look at when making decisions for the remaining 25% of seats not covered by the Top 10% Rule. We therefore conclude our analysis. However, we also find that the UT Policy satisfies the but-for test and thus fully satisfies all three parts of the quasi-strict scrutiny.

In this case, the Supreme Court has been called on to determine whether the UT admissions policy is constitutional under the Equal Protection Clause of the Fourteenth Amendment and Title IV of the Civil Rights Act of 1964. In this instance, a case arising due to Affirmative Action policy, we reaffirm our prior rulings and once again state that the appropriate test is that of quasi-strict scrutiny. It is therefore the determination of this Court, that the UT admissions policy serves a compelling state interest. As this Court has consistently found, and continues to find today, student body diversity is a compelling state interest. Furthermore, the plan is substantially related to that interest, as it was created for the purpose, and also has the effect of increasing diversity at the institution. To be sure, this plan does not serve as a but-for causal link between the suspect class and the underlying benefit sought, as we find that the use of race is just another consideration in the admissions process. In light of the above, the Supreme Court hold that the UT admissions policy, created for the purpose of increasing student body diversity, is nothing short of constitutional.
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#### Other Authorities

- Const. amd. 14 § 2

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In Defense of Valley Girl English

By: Reilly Nycum, Southern Oregon University

Introduction

In the early 1980’s, musical artist Frank Zappa released “Valley Girl,” a song depicting Valley Girl English, a term specifically used to describe the dialect spoken by those living in and around the San Fernando Valley. In the song, Zappa chants “She’s a Valley Girl / And there is no cure” as a woman’s high-pitched voice whines about her superficial life in the Valley, saying phrases such as, “Like, OH MY GOD! / Like-TOTALLY / Encino is like SO BITCHEN.”¹ With this song, Zappa forever immortalized the term for users and listeners alike. His easily recognizable depiction of Valley Girl English resonates with listeners in several ways. When the typical person hears Valley Girl English they may think of skinny girls prancing around in short skirts at the mall in sunny California. People across the United States attach a stigma to Valley Girl English to such an extent that most seem to revile the dialect and label its distinctions as bad habits. Over time, scholars have become more interested in this phenomenon, researching exactly what characteristics people associate with the dialect and the perceptions that they have of those traits. Also, many study the linguistic trends people link to Valley Girl English such as like, be like, say, go, and particular slang terms in order to characterize the dialect and undercover possible reasons for the speech patterns. Vowel shifting, when people change the pronunciation of their vowel sounds, has recently been identified with the Valley Girl dialect, although many other dialects demonstrate this same change. Much of the research on Valley Girl English is closely intertwined with popular perceptions of the dialect, notably with uptalk, which occurs when a speaker raises their intonation at the end of a word or sentence. This change most visibly highlights the general distaste much of the population has for the dialect. Ultimately, many fail to listen past the parodies and satire to pay attention to what is being said. However, the characteristics of Valley Girl English, such as vowel shifting, the quotative and non-quotative like, slang, and uptalk, do not signal a new change in the language and demonstrate the assets of a legitimate dialect spreading throughout the nation.

Regional Perceptions of Dialects

Despite the fact that California dialects find representation in many songs, movies, and television shows, relatively few scholars have studied the range of dialects in the area. Carmen Fought, a professor of linguistics at Pitzer University, was the first to conduct a study in 2002 in order to analyze the dialectology of California.² In her study, Fought handed 122 respondents (112 of them from California), a blank map of the United States and instructed them to mark the boundaries between where they thought people started speaking

³ Ibid., 114.
distinct dialects. After examining the maps, Fought noticed that “California is associated with good English, but never proper.”5 The slight distinction between ‘good’ and ‘proper’ reveals the confusion Californians feel about their dialect. Although people rated California very highly in respect to ‘correctness’ or ‘politeness,’ they rated the Valley Girl dialect as a signal of low intelligence.5 Despite Fought’s relatively small sample size, her results acknowledge the biases Californians could hold about their own speech patterns. Other studies have since been conducted that reveal information about the way Californians and non-Californians view dialects. In a study published in the Journal of English Linguistics titled “Hella Nor Cal or Totally So Cal? The Perceptual Dialectology of California,” undergraduate field workers at UC Santa Barbara conducted a study using blank map methodology to uncover biases around California dialects. Researchers documented that while nonresidents thought they had a greater degree of confidence when labelling California, their responses reflect biases found in the media, focusing on “the most stereotypical and highly visible aspects of California’s language and culture.”6 Despite this, people are still inclined to rate California as speaking “good” English, showing that negative biases surrounding California dialects may focus more specifically on the Valley Girl dialect.7 These studies and others reveal the role of perceptual dialectology in revealing the perceptions people hold about Valley Girl English.

Vocabulary

The term like, often incorrectly stereotyped in the media as a meaningless interjection used by young people, did not originate from Valley Girl English. In an article titled “Like and Language Ideology: Disentangling Fact From Fiction,” Alexandra D’Arcy, a professor at the University of Canterbury, calls attention to the myths surrounding like and concentrates on its tangible usage in language.8 D’Arcy’s article systematically breaks down various stereotypes surrounding like, including the erroneous belief that the practice began with the Valley Girls.9 By analyzing many different speech patterns, D’Arcy gathered that the frequency of like usage does not correlate with the beginning of Valley Girl English but only heightens with the advent of the dialect.10 Moreover, she points out that “outside its local milieu, “Valley Girl” was not an active model for association, linguistic or otherwise, until after 1980.”11 Since Valley Girl English brings attention to like, people associate the change with the Valley Girls. Rather, the use of like as “discourse marker, a discourse particle, and an adverb of approximation” came into existence with the advent of other dialects across the United States and elsewhere.12 Additionally, D’Arcy’s identification of like as containing more meaning than an empty conversation filler or a verbal tic shows the true range of expressions like has in the language. Her analyses also reveal that like has set significations that set out rules of when to use like or not.13

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5 Ibid., 114.
6 Ibid., 133.
7 Ibid., 127.
9 Ibid., 348.
10 Ibid., 405.
11 Ibid., 404.
12 Ibid., 405.
13 Ibid., 395.
Instead of viewing like as a signal of uncertainty D’Arcy calls to mind that linguistic trends almost always have hidden rules that outsiders do not understand. Myths surrounding like attach original usage and a pointless meaning to Valley Girl English despite the fact that Valley Girl English only draws attention to the term.

The use of quotatives associated with Valley Girl English, such as be like, say, and go, carry a similar connotation as like but reveal the biases that popular culture places onto the Valley Girl dialect. Three scholars from Cornell University studied the phenomenon of these quotatives, observing that be like acts as a way for speakers to introduce both “inner monologue or direct speech” to add a certain level of emphasis depending on usage. The researchers later came to the conclusion that “be like is functionally versatile and therefore may have more staying power in the lexicon.” Furthermore, say and go offer a much more complex range of expressions than outsiders generally apprehend. Outside listeners often think that go is a synonym for say and fail to see the difference between the two. Scholars instead notice that “the use of go correlates with only the dramatic use of historical present and direct speech.” Without an comprehension of the intricacies of quotatives such as be like, say, and go, listeners misunderstand the intention behind them. They only hear phrases unfamiliar to their vernacular and associate the change with a degradation of the language by the Valley Girls. In fact, women did not use any of the quotatives more than the men in this study, particularly be like which was used more commonly by men. Even more so, some scholars classify the usage of be like as a convergence between Black English Vernacular and White English Vernacular. Taking into account this data and that the participants using these quotatives originated from the Northwest, the connection of these quotatives by users of them to Valley Girl English is quite interesting. Although the Valley Girl dialect incorporates the use of say, go, and be like, the connections people make from the quotatives to Valley Girl English points to a cultural perception rather than an actual linguistic change.

Slang also plays a large role in distinguishing Valley Girl English. Terms such as those used in the influential 1995 film Clueless such as “as if,” “phat,” “whatever,” “bugging,” and others characterize the vernacular in the eyes of those who hear and speak it. Although movies and television do not change people’s speech, Clueless does seem to influence Valley Girl English, especially in relation to slang, and may act as an exception to this rule. Linguists Robert MacNeil and William Cran endeavored to catalog Valley Girl slang by conducting a study on teenagers from Irvine. After giving the teenagers cameras to record their speech for several days in both personal and formal environments, MacNeil and Cran asked the teens to help them compile a dictionary of the terms they used throughout the footage. In this dictionary, MacNeil and Cran notice “[t]en of the twenty-two expressions listed above are borrowed from black talk,

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15 Ibid., 225.
16 Ibid., 216.
17 Ibid., 221.
18 Ibid., 216.
19 Ibid., 224.
20 Robert MacNeil and William Cran, Do You Speak American? (Harcourt, Inc, 2005), 157
21 Ibid., 157.
22 Ibid., 159.
23 Ibid., 159.
or, as a student called it, ‘the ghetto fab vernacular that many teens use today.’” Just as with the quotative be like, slang terms get appropriated in the Valley Girl dialect. This carrying over of linguistic characteristics complicates the current opinion on Valley Girl English. Much of the vernacular does not show any original movements in language; however, the dialect does call to attention the changes that are happening. While many correlate slang terms and other linguistic trends to the creation of Valley Girl English, this may only be due to the massive media coverage on the dialect.

Intonation

Dialects and Vowel Shifting

The vowel shifting observed in Valley Girl English represents a change in language observed in many other dialects, specifically in the United States. In a study conducted at the University of California, Berkeley, linguists noted that in Valley Girl English, the back vowels shift forward, “…front vowels have raised variants in some phonological environments and lowered variants elsewhere.” This fronting of back vowels has also been observed in dialects in Philadelphia and Detroit, such as with the /aw/ sound in the word now. Though other dialects are experiencing a vowel shift, people connect the change with Valley Girl English. For instance, in “Valley Girl” Zappa satirizes the vowel shift in words such as “super” or “tally,” pronouncing them by fronting the /o/ sound. Do You Speak American?, a book studying various dialect trends across the United States, expands on the UC Berkeley findings by explaining how this vowel shift and other vowel shifts are a part of a larger trend in the United States, stating, “These linguists also found some chain-shifting of vowels resembling William Labov’s Northern Cities Shift around the Great Lakes—black sounding like block.” Characteristics of the Northern Cities Shift, first defined by linguist William Labov, began far before the creation of the Valley Girl dialect. When characterizing Valley Girl English, it remains important to recognize that the vernacular borrows from the vowel shift but does not represent a completely new change in the language. Vowel-shifting, while an important trait in the Valley Girl dialect, is not unique to the vernacular, despite its cultural association.

Speaker Age and Sex

Uptalk, much like other language developments related to Valley Girl English, tends to be over-exaggerated by the media and thus labelled as yet another horrible trend led by the younger generations. In a book titled Uptalk by Paul Warren, an Associate Professor at Victoria University, Warren thoroughly investigates the mechanics behind uptalk as well as the media’s depiction of the shift. In a sample examining 182 media portrayals of uptalk, Warren noted “a sizable minority were clearly negative or condemning of uptalk . . .If speaker sex was mentioned, then it was almost always to indicate that uptalk was a typical female trait.” The way the media depicts uptalk creates a general distaste for the innovation which fosters an unhealthy view of the quickly spreading trend.

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24 Ibid., 161.
26 Ibid., 125.
27 Robert Macneil and William Cran, Do You Speak American? (Harcourt, Inc, 2005), 161
28 Ibid., 38.
The misrepresentation of uptalk as being a feature only found in young, female speakers shows misrepresentation of a trend that is used by many different types of people, including men and the older generations. While Warren did notice that females and younger people tend to use uptalk with a higher frequency, men and older people still use uptalk.\textsuperscript{30} This stereotyping of uptalk into a female quality, in part based in research, could be due to the fact that men rarely hit the high pitches women frequently use and which popular media associates with uptalk.\textsuperscript{31} As far as age, studies show “teenagers use uptalk in 2.29 percent of tone groups, while adults have a considerably lower rate of 0.23 percent.”\textsuperscript{32} While certainly this statistic reveals the higher rates of uptalk in younger people, older people still participate in the trend. Furthermore, rather than defining uptalk as a feature of indecisiveness, Warren suggests that it may indicate “openness, only in this case they are inviting the listener to participate in the conversation, or to indicate their understanding of what has been said. It is used to share information rather than to tell (or to question).”\textsuperscript{33} Warren’s findings on the intentions of uptalk challenges negative views on the trend and give a less biased perspective on uptalk as a whole. The confusion around the purpose of uptalk and its association with a small subset of speakers severely understates the real impact of uptalk on modern dialects and people.

People tend to instill negative implications on uptalk, in part due to portrayals in the media; however, it remains a lasting and prevalent trend in all dialects and people regardless of their age or sex. James Gorman coined the term “uptalk” in a 1993 New York Times article titled ON LANGUAGE; Like, uptalk?\textsuperscript{34} According to Gorman, uptalk is defined by a rising intonation at the end of a sentence that transforms the sentence into a question.\textsuperscript{35} Although Gorman correctly defines uptalk, his further account of the trend reveals his bias against the tonal shift. He states, “nobody knows exactly where uptalk came from. It might have come from California, from Valley Girl talk . . . Some twenty-somethings say uptalk is part of their attitude: cool, ironic, uncommitted.”\textsuperscript{36} While it seems extremely doubtful that “young twentysomethings” consider uptalk as a part of their “cool, ironic, and uncommitted” attitude, Gorman’s comments certainly reflect the popular perception of uptalk. Many interpret uptalk as an act of doubt and stupidity, characteristics also forced upon Valley Girl English. Gorman later states in his article the idea that “uptalk won’t be uptalk anymore. It will be, like, American English?”\textsuperscript{37} While Gorman does not agree with the spread of uptalk, he hits on an interesting aspect of the trend. Uptalk is spreading amongst all genders, ages, and areas. While people regularly connect uptalk with Valley Girl English, uptalk extends into many other dialects and languages.

\textsuperscript{30} Ibid., 111.
\textsuperscript{31} Ibid., 112.
\textsuperscript{32} Ibid., 117
\textsuperscript{33} Ibid., 188
\textsuperscript{34} Ibid., 6.
\textsuperscript{36} Ibid
\textsuperscript{37} Ibid
Conclusion: Perceptions in Popular Culture

Popular culture and common belief foster an inherent predisposition against the characteristics of Valley Girl English. Many, however, tend to overstate some of the qualities of Valley Girl English, such as the use of like, and transform the vernacular into something inexorably linked to materialism and superficiality. This presents many issues when attempting to understand the dialect because it categorizes the Valley Girl English as illegitimate. This prejudice also causes people to understand Valley Girl English as a dialect only spoken by a certain type of person, the Valley Girl. This simply does not account for the wide usage of the facets of Valley Girl English, such as uptalk and the quotative be like. While one may feel that Valley Girl English sounds ‘dumb’ or ‘air-headed,’ it’s features are not unusual and may even be adopted from other vernaculars. Furthermore, the changes observed in Valley Girl English are growing increasingly apparent in other dialects across the United States. When people dismiss dialect patterns as purposeless and annoying, they fail to recognize the ways in which people use the patterns as a valid way of communication.
BIBLIOGRAPHY


Determining Strategies for the Embry-Riddle Aeronautical University College of Engineering Faculty to Use to Increase the Retention Rate of Women in their Undergraduate Engineering Programs

By: Antonia Santacroce, Embry-Riddle Aeronautical University

Introduction

This report analyzes and evaluates strategies that could be used to increase the retention rate of undergraduate women engineering students for Embry-Riddle Aeronautical University’s (Embry-Riddle) College of Engineering. It recommends strategies that could be easily integrated into the existing engineering programs. Additionally, this report addresses all women and does not specify different strategies for women of color. Much of the reason that women leave the engineering discipline is due to their decreased confidence in a male-dominated culture. This decreased confidence sets in during their very first year and persists while they are a minority in their field. To remedy the gender gap, it is recommended that women be allowed and encouraged to work with each other in the Introduction to Engineering (EGR101) course, and that women are more present in the Engineering Sciences faculty.

Background

Throughout America, only 28% of science, technology, engineering, and mathematics (STEM) students are women.\(^1\) This gender disparity is even more pronounced in Embry-Riddle’s undergraduate population, where only 20% of the enrolled students in fall of 2016 were women, which means that only about 1,000 students of the 4,300 undergraduate student population are women.\(^2\)

According to Dasgupta et al., having a significant gap between the number of female and male students leaves women as the “untapped human capital that, if leveraged, could increase the STEM workforce substantially”.\(^3\) Therefore, Embry-Riddle’s College of Engineering would benefit from an increase in the number of women who are enrolled in their undergraduate engineering programs.

Unfortunately, Embry-Riddle does not have much control over the external factors that contribute to a woman’s choice of major before she applies to and enrolls in college.

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2 “Fall Enrollment, All Students: Gender,” Embry-Riddle Aeronautical University Office of Institutional Research, 2016.

3 Ibid., 1.
such as institutional stereotypes, family pressure, and quality of previous STEM education. The $5,000 “Woman of Excellence” scholarship is helpful, and it makes sense that by providing financial assistance to women, they will be more compelled to attend Embry-Riddle. Therefore, this report focuses on ways to increase the retention rate of women in Embry-Riddle’s undergraduate engineering programs, instead of the enrollment rate. In addition to offsetting the disproportionately small number of women in these programs, increasing the retention rate would contribute to higher tuition revenues, as well as Embry-Riddle’s national ranking.¹

**Resources**

The research included in this report is a combination of scholarly articles, some of which include primary research, and data gathered by both Embry-Riddle’s Office of Institutional Research and Smith College’s Office of Institutional Research. The scholarly articles were published in the Proceedings of the National Academy of Sciences, Journal of Engineering Education, ILR Review, Sex Roles, and the International Journal of Applied Engineering Research. Of those, all except the article published in the ILR Review conducted their own research through experiments or surveys. The article published in the ILR Review analyzed information from the “2003 and 2010 National Survey of College Graduates.”² The information from Embry-Riddle’s Office of Institutional Research is in the form of raw data, which is synthesized with the other research so that the conclusion and recommendations are tailored specifically to Embry-Riddle.

**Scope and Limitations**

This report addresses methods that could potentially be used to increase the number of female undergraduate engineering students at Embry-Riddle. The report does not perform a cost analysis of these methods. While the report addresses women as a whole and does not specifically address women of color, it is implied that the recommendations can be applied to all women as well as to women of color. Much of the reason that women tend to leave engineering programs is due to their presence as a negatively-stereotyped solo, which is also the case of women of color, due to Embry-Riddle’s undergraduate population being comprised of 54% white students.³

Additionally, Embry-Riddle’s Office of Institutional Research does not specify whether students who leave their original engineering program switch to another engineering program, or leave the college of engineering altogether. However, according to Hunt, women are more likely [than men] to leave STEM fields altogether, as opposed to switching between, for example, mechanical and electrical engineering.⁴ Therefore, it is assumed that the attrition rates consist mostly of women who are leaving the college of engineering.

**Literature Review**

The current research surrounding the topic of women in engineering and other underrepresented STEM fields acknowledges the gender gap and examines factors that could be causing this gap, as well as specific methods for how to increase the number of women in these fields. However, to increase the number of women working in engineering jobs, the first step is to increase the number of women who graduate with engineering degrees.

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That is what most of this research is focused on; it gathers information mostly from undergraduate-level college students and tests methods that apply to them.

According to Jagacinski, much of the difficulty women face in engineering courses is not the subject matter itself; it is their own perception of their ability. Women do not perceive themselves to be as capable as they truly are. Therefore, women are discouraged from pursuing engineering. The lack of mentorship tailored to women simply adds to the idea that women should not be engineers. However, when mentorship and support is offered, “female undergraduate engineering students in their first and second years [take] significantly more advantage of the support provided to them through friends, professional clubs, and the university [than any other group of students]”. This shows that women are willing to work hard to become engineers if they know that they are supported and have a chance at success. However, their drive is undermined without the necessary support.

In addition, the study conducted by Jagacinski indicated that women do not lack interest in engineering; they actually find engineering courses more enjoyable than men. Although it may be a reason that some women leave engineering fields, a lack of interest is not inherent to women as a whole. This is further supported by a study conducted by Youn, which cites “sociocultural factors” as being one of the main reasons women leave engineering. This includes, but is not limited to, a male-dominant culture, glass ceiling barriers, and society’s prejudice against female engineers, all of which contribute to low self-confidence in women. Unfortunately, combined with the high standards women set for themselves, their feelings of inadequacy persist throughout their career and may ultimately cause them to leave the field altogether.

Male Dominant Culture

In addition to a lack of self-confidence, a significant reason that women leave engineering can be directly attributed to their presence as a minority. According to Hunt, the gender gap in engineering is significantly larger than most other fields, with the interesting exception of economics and finance. The work done by people in these two fields shares very little similarities. This implies that many women choose to leave these fields because of the predominance of men, as opposed to the type of work that is required of them. Additionally, before women believe that they are equally as competent as men, they must continually outperform those men. Even though women had higher academic achievement levels than their male counterparts, they “rated their academic abilities lower than did male engineering students.”

This is all due, in part, to the untrue cultural belief that men are more naturally gifted with regards to STEM fields. The effect of a male-dominant environment is further studied by Dasgupta et al.; when women are asked to do group work with a group which is made up of 50% men, they interpret the group environment as more “threatening” and are less willing to share their ideas. In groups that are made up mostly of other women, they feel challenged in a more positive way. These

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effects are significantly more pronounced during the first year of undergraduate education.

Embry-Riddle’s Office of Institutional Research also provides some valuable data. For example, from Figure 1 (below), it is possible to see that the change in the attrition rates of men and women in the undergraduate engineering programs are not significantly different. However, because women are already so underrepresented, the difference in their attrition rates has a much larger impact. It is also worth noting that the change in the women’s attrition rates after the second year is significantly less than between the first and second years, and continues to decrease afterwards, which suggests that once women have established themselves in the field, they are less likely to leave. Additionally, Hunt states that men are more likely to involve themselves in another STEM field, whereas women are more likely to leave STEM altogether, which supports the idea that while men may be switching between engineering fields, women are more likely to make a complete departure from engineering.16 Although Smith College’s Office of Institutional Research contains different information than that of Embry-Riddle, it is important to note the distinct change in retention rates. Smith College has an all-women engineering program, and the school as a whole has a retention rate of 94%.17 Although the retention rate specific to their engineering program is not given, it can be assumed that the data for the college can be reasonably applied to the engineering program as well. This is a much higher retention rate than Embry-Riddle, and although there may be other factors, it is worthwhile to consider the gender difference as influencing the retention rate.

Figure 1: Change in the percent of an original group of students who either left their degree program or left ERAU after a certain number of years, by percent (ex. between their first and second years, 12% more women and 10% more men were not enrolled in their same degree program, or ERAU altogether). Adapted from Embry-Riddle Aeronautical University Office of Institutional Research.

Analysis

Using this information, it can be determined that in order to convince more women to stay involved in engineering, the effects of being a “token” in a male-dominated culture should be lessened as much as possible. As can be seen in the study done by Dasgupta et al., only women who are part of a female majority are able to “deflect stereotypes,” accept the challenge of their work, and participate more actively. Therefore, an environment which is made up of at least 50% males has a negative effect on women’s self-confidence and willingness to participate. Embry-Riddle’s environment, being made up of 80% males, clearly falls into a category where women do not have the benefit of being surrounded with other women.

The negative effects this could have on women’s desire to persist are clear. With a lowered amount of self-confidence due to the predominantly male atmosphere, women tend to rely on support from each other and from women faculty members. If this contextual support is lacking, women will tend to drop out of school or change their major. Additionally, because “women are more likely to switch out of engineering during the first 2 years,” much of this support must be able to reach women within their first semesters attending college, when they are at the highest risk of attrition from engineering programs. The opposite effect can be seen in Smith College’s all-women engineering program.

The first two years of many Embry-Riddle engineering students’ curriculum include introductory courses as well as courses which teach the basic science behind engineering. EGR101 is generally taken by freshman, and it is often their first real experience with engineering processes. The course also requires a great deal of group work, although the exact amount varies by instructor and engineering discipline. The Engineering Science (ES) courses are often taken during students’ sophomore years and include Statics, Dynamics, Thermodynamics, and Solid Mechanics. Both of these are prime locations for women to be impacted.

Findings

Although on the surface there may seem to be many reasons that women do not continue with undergraduate engineering programs, they can all be combined into one series of events. Women who have chosen to study engineering enter college and are immediately singled out as being one of a few of their gender. Combined with the cultural stereotype that women are not traditionally involved in engineering, the male-dominant atmosphere causes women to interpret this new environment as threatening, and their self-confidence plummets, even if they thoroughly understand the material and are outperforming their male classmates on graded assignments. This lower self-confidence eventually causes women to leave engineering altogether, instead of trying to persist in a field which they believe is not right for them. However, this process can be avoided if the women’s environment is made up of at least 50% women, or if they are receiving strong support from peers and faculty. Additionally, if women remain in the engineering discipline after their second year of college, they are far more likely to graduate with an engineering degree.

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19 “Fall Enrollment, All Students: Gender,” Embry-Riddle Aeronautical University Office of Institutional Research, 2016.
Recommendations
Based on the research, it is recommended that Embry-Riddle’s College of Engineering should:

- Target first- and second-year undergraduate students.

- Place female students into female-dominated groups in the EGR101 course. By doing so, the women will feel like they can contribute more to the project, and will feel more rewarded when the project is complete. This does not have to be the case for all projects, however, if a woman is assigned solely to male-dominated groups, she may feel less confident of her abilities and less likely to continue with engineering.

- Encourage the presence of women as faculty members and professors in the ES courses. Much of the faculty of the Engineering Fundamentals (EGR) courses are women. This is good because most students take EGR courses within their first year, and it gives the women in those courses support as well as role models within their disciplines. However, the presence of women in the faculty of ES courses would help significantly as well. By continuing to provide faculty support and role models into the second year of women’s education, the women will be more likely to continue working towards an engineering degree.


The Rise and Fall of the Weimar Woman

By: Marie Silva, Southern Oregon University

Introduction

The women in Germany during the Weimar Republic had an interesting opportunity. Following the war, women were given the right to vote, hold elected office, leave the home in favor of work, seek higher education, and strive to find a life outside of societal gender norms. They fought for political reforms and pursued opportunities that had eluded them previously, but economic restrictions and gender bias soon frustrated their efforts. The following historical examination of women in Germany from the end of World War I through the rise of the Third Reich demonstrates the progress of women’s political, social, and reproductive rights that were expanded during the Weimar Republic (1919-1933). Further, this analysis attempts to explain why a majority of women willingly surrendered progress by conforming to traditional cultural and gender expectations under the Third Reich.

Background

In 1871, the German Empire was founded following three Prussian Wars. Divided into two houses, the government consisted of “The Reichstag to represent the people, and the Bundesrat, to represent the 25 states.”1 The two sectors of parliamentary power were designed to create a balanced government that represented all people. However, this governmental structure did not reflect the shift away from rural hamlets to urban areas. Lack of political voice for the populace led to the rise of alternative political parties, such as the Sozialdemokratische Partei Deutschlands (SPD)2 which began as a grass roots type movement.3 Such political organizations were referred to as Reichsféine4 by Otto von Bismarck, the Reichskanzler.5

In 1914, Germany entered World War I, honoring their alliance with the Austria-Hungarian Empire. At this point in history, Germany was an industrial giant. United behind a common War effort, Germany felt a national unity that had previously been lacking.6 However, WWI was not a quick affair, and the Germans suffered greatly for their participation. Crippled with huge numbers of casualties, food and fuel shortages; Germans found themselves in a troubling situation. “Soldiers returning from the military fronts by the hundreds of thousands were left stranded, jobless, hungry, and bitter – grist for the mill of revolution.”7 As a result, the cultural and societal expectations of women began to shift. However, this shift was not permanent. An examination of the changing expectations of women in Germany follows.

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1 Encyclopedia Britannica, “Germany.”
2 Translation: Social Democratic Party, abbreviated SDP.
3 Encyclopedia Britannica, “Germany.”
4 Translation: Enemies of the empire.
5 Translation: Chancellor of Germany
6 Encyclopedia Britannica, “Germany.”
7 Encyclopedia Britannica, “Germany.”
World War One: A Window of Opportunity

Anton Kaes and his fellow editors of The Weimar Republic Sourcebook wrote, “World War I and the advent of the republic significantly altered the role of women in German society.” Traditionally, German women were restricted to the roles of wife and mother. During WWI, women entered the workforce on behalf of the war effort and to support the German economy while men were fighting on the front. Kaes wrote, “the war had placed many women in the workplace and opened the doors to higher education…” War brought the women of Germany opportunity that they hungered for, and a chance to break out of their socially and culturally prescribed roles as wives and mothers.

In 1919, Marianne Weber wrote an open letter in Frauenfragen und Frauendanken, Gesammelte Aufsätze that brought forward an issue that was likely on the minds of all women in Germany - the return of the men from war. Her letter discussed the “special cultural mission of women” and what they must do to assist the men on reintegrating into productive society. She writes, “in order to master the devastating effects of this terrible war, still scarcely estimated in their magnitude, we are in need of unflagging moral energies and great faith.” She saw the role of women as the anchor of the German culture. Women were a constant reminder of what German society used to be, and what it could be again. They were the core of the German household, and Weber hoped that their role as a cultural anchor would serve as a reminder to the returning men, and assist in reorienting them into German society. Further, she writes, “we can only hope that their inner natures were protected by some kind of immunity to poisonous influences … One can only hope that the millions of men who had to withstand the years of inconceivable hardships have not lost their desire for it.” According to Weber and those like her, German women were the keepers of the cultural richness of Germany, and Weber believed that it was their mission to remind men of that fact.

Post War Challenges

Economic Opportunity

Despite that, not all women wanted to be the cultural guardians envisioned by Marianne Weber. With new opportunities available, more women saw that marriage and children were not the only purpose of life. Women began to seek employment, take advantage of higher education, and delve into the political sphere. Women had been granted the right to vote and hold political office in 1919, after WWI ended. Claudia Koonz describes the events that transpired to enfranchise women as a complete surprise. When the SPD came to power in 1918, their previous two decades spent advocating women’s suffrage was vindicated. Given the opportunity to participate in politics, women not only voted in the first election of the Weimar Republic, but many ran for political office. In fact, during the first election of the new republic that women could participate in, 111 women were elected into positions in the Reichstag. Koonz writes, “Between 1919 and 1933, approximately eight percent of the national legislature was composed of women…This relatively large representation of women was one indication of the importance accorded to women’s issues at that time.”

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9 Kaes, 195.
13 Kaes, 195.
14 Koonz, 664.
As a result of women’s ability to vote, women visibly aligned themselves with political parties that embodied their beliefs and provided a political platform for women’s issues. For example, many women flocked to the Deutschnationale Volkspartei (DVNP)\(^{15}\), which according to an article by Raffael Scheck, the “…DVNP wrote legislation on immorality in public life (‘trash and dirt’), the abolition of regulated prostitution, and a variety of matters concerning social welfare, the family, schools, and the churches.”\(^{16}\) Regardless of a shift in political power for women in Germany, the international balance of power served as a roadblock for further progress.

As a result of the “War Guilt Clause,” Article 231 of the Treaty of Versailles, Germany was at a global disadvantage after World War I. Germany accepted responsibility for “causing all the loss and damage” imposed on the Allied powers as a consequence of the war.\(^{17}\) This clause required Germany to pay war reparations that were economically devastating. Beginning in 1920, Germany experienced a period of hyperinflation, which peaked in 1923. “When the economy collapsed on November 15, 1923, it took 4.2 trillion German marks to buy a single American dollar.”\(^{18}\) As a result, frustrations abounded amongst women who were choosing to work and those needed to work to support their families. Women who lost a spouse in the war had trouble finding employment to support her family because men were wanted first for employment. Women were frustrated that they had willingly entered the workforce to support the fatherland during the war, but upon the war’s end, were left with rejection and menial wages. Consequently, women accepted jobs for a fraction of the wages that men would earn while still caring for children and performing all of the household duties. This left a feeling of discontent among working women in Germany. Written by an unknown author and published in Die Kommunistin in 1921, “Zum internationalen Frauentag. An alle werktätigen Frauen!”\(^{19}\) was a call-to-arms of sorts for the frustrated working women of the Republic. It states, “Your lives and deeds are dominated by exorbitant price increases with which small and medium incomes cannot keep pace. Exorbitant prices deplete your bread and season it with the bitterest of worries and scalding tears. ... you have the doors to the places of work and employment slammed in your faces. It is the family you should tend to, which you don’t have or for which you would need bread. Think of the mass graves in which flourishing male life lies mouldering…”\(^{20}\)

Although this “call to arms” was published with the intention to enact change in the post-war period, no meaningful movements emerged to restore respect for women in the workplace.

**Societal Expectations**

However, women in the post-war period viewed themselves as a new type of woman. Due to the workload of home and workplace responsibilities thrust upon the Weimar Woman, this generation desired to “break free” from traditional gender norms. For example, Elsa Hermann, in her piece entitled The New Woman, wrote, “to all appearances, the distinction between women in our day and those of previous times is to be sought only in formal terms because the modern woman refuses to lead the life of a lady and a

\( ^{15} \)Translation: German Nationalist People’s Party (DNVP)
\( ^{17} \)Encyclopedia Britannica, “Germany.”
\( ^{18} \)Encyclopedia Britannica, “Germany.”
\( ^{19} \)Translation: Manifesto for International Women’s Day.
housewife, preferring to depart from the ordained path and go her own way.” By re-defining concepts of gender roles, Hermann sought to establish that women are not inferior to the men. “The people of yesterday are strongly inclined to characterize the modern woman as unfeminine because she is no longer wrapped up in kitchen work and the chores that have to be done around the house.”

Women of the Weimar Republic were experiencing an awakening. These women longed to abandon their traditional roles and step alongside men as equals. “Despite the fact that every war from time immemorial had entailed the liberation of an intellectually, spiritually, or physically fettered social group, the war and postwar period of our recent past had brought women nothing extraordinary in the slightest but only awakened them from their lethargy and laid upon them the responsibility for their own fate.”

Weimar women sought more from life than what was proscribed by the contemporary expectations of society. Barbara Kosta argues that, to some, the modern woman of Weimar was viewed as an insult to previous conceptions of Germanic motherhood, and womanhood in general. The Weimar woman, in her quest to become her own individual and an equal to the men of the Weimar Republic, found her reality to be full of frustration.

Further, consensus was not found among women living in Germany. For example, not all women agreed that being valued by society as equal to men was a worthwhile pursuit. Some married women who were working found that they were still expected to do household chores on top of their work duties. As such, this group of women did not have the ability or incentive to fight for equality. Artist Otto Dix depicted images of mothers in urban industrial settings, personifying the working-class mother. In Michelle Vangen’s article *Left and Right: Politics and Images of Motherhood in Weimar Germany*, she states that Otto Dix’s works “appear as actual portrayals of the experience of being a destitute mother in one of Weimar Germany’s many big cities.”

Textile workers described their experiences as working women and mothers in *Mein Arbeitstag, Mein Wochenende*. These articles tell tales of women rising before the sun, getting everyone in the household ready for the day, heading off to jobs, darning socks and other small mending tasks on their 30-minute lunch breaks, and after work, the life of woman is a flurry of cooking, cleaning, and preparing for the next day.

Women were beginning to sour on their so-called freedoms and equalities. As a result of being overextended in the home and in the workplace, women could not devote time to the political process. Due to the high expectations of society, Weimar Women were in no position to redefine their role in society or politics. Further, the social order at the time presented its own set of challenges.

For example, Hilde Walter explains in *Twilight for Women?* that “a mass psychosis cannot be exercised by such reasonable, sober arguments, nor can they now stamp out the nearly mythical idea of the economic detriment caused by working women.” Walter’s argument is simple at its core. Without working women, there would be a detrimental hit to the

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22 Hermann, 207.
23 Hermann, 207.
25 Translation: My Workday, My Weekend.
economic stability of Germany, but the patriarchy still wanted women to return to their traditional roles as wives and mothers. Traditionalists believed that women were best suited to be wives and mothers, rather than scholars or low-wage workers, regardless of the situation of the individual. However, this meant “that two million women of marriageable age would be left altogether unprovided for were they to be without work.”

Perhaps the reluctance of men to welcome women into the workplace stems from the high rate of unemployment among men returning from the war. After the Treaty of Versailles was signed, the economic situation in Germany was a tenuous song and dance, with employers constantly seeking ways to increase profits to offset the outrageous inflation that Germany was experiencing. Hiring women at a fraction of the salary that men would command was a popular way for employers to achieve this end.

Reproductive Rights in the Weimar Republic

Motherhood became another area of contention for women the Weimar Republic. Wehrling pointed out how some women no longer believed that motherhood was a worthy inclination. “Ask any one of those short-skirted, silk-stockinged females what she makes of the thought of carrying and bearing a child. She turns away from the possibility with an amused shudder.” With sexual liberation and promiscuity sweeping through Germany, the constant worry of becoming pregnant was a very real concern for most women. Men believed that birth control was their business. Additionally, the German government regulated reproduction with legislation such as Paragraph 218 of Basic Law, enacted on January 1, 1872, which regulated abortion. According to Paragraph 218, once the egg is fertilized, nothing can be done to prevent that fertilized egg from being born. Manfred Georg wrote, “it is not a matter of whether and how the perpetrator of this act should be punished, but how - and here only the numerically largest category (number two, abortion from need) is relevant - the perpetrator is to be protected from the consequences of the act; the issue of abortion is an issue of protecting birth, a population policy that is willing to take its cue directly from the needs of the fetus.”

Manfred Georg argued that penalizing a mother for aborting a fetus was “pointless”. However, abortion carried a criminal penalty for all involved in the procedure under the rule of law established by Paragraph 218. For the first time in Germany, the post war period introduced the desire for reproductive rights. Activists, such as Georg, sought to reduce this penalty, which would grant women autonomy over their bodies. However, the rise of the Third Reich dampened the efforts of progress that emerged after World War I ended.

Understandably, women were weary after a decade of fighting for equal rights, equal pay, and control over their bodies. A common disincentive to for action seemed to ripple through society. In an economically crippled country, women were losing the battle for expanded rights. Alice Rühle-Gerstel understood the awkward and tenuous position of the “new woman” of the Weimar Republic. She wrote, “Her old womanly fate – motherhood, love, family – trailed behind her into the spheres of the new womanliness, which immediately presented itself as a new objectivity. Therefore, she found herself not

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28 Walter, 211.
29 Wehrling, 722.
liberated, as she had naively assumed, but now doubly bound.” The women of Weimar felt the strain of these conflicts, coupled with the strain of a depressed and virtually destroyed economy. Years of struggle had left them feeling defeated and looking toward the past with nostalgia. The Weimar Republic Sourcebook points out, “many women in fact voted for conservative, even radical, right-wing parties because these promised a restoration of order through traditional roles.” The women were looking for any change that would bring them back to their past, because they most likely believed that things could not get any worse. Although women in post-War Germany were able to redefine their social identity, nostalgia for better times undermined the progress of expanded women’s rights.

Still in the depths of the Great Depression (1929-1932), Germany was experiencing political instability. With soaring unemployment rates and a fractured economy, the populace was fed up with the political inactivity from the Weimar government, and was looking for a change. That change would come with the election of Adolf Hitler as Chancellor of Germany in 1933. He took office with promises to change Germany for the better by restoring the glory and prestige of the fatherland. Given the poor economic and political past that the Germans had experienced under Otto von Bismarck and the Weimar Republic, the German people were anxious to see what Hitler and his government could do for Germany.

Women and Motherhood in the Third Reich

Motherhood

The Third Reich made women and mothers a priority in their political rhetoric. According to Ludolf Hasse, an Office of Women’s Affairs was established and tasked with the “education of the female sex toward maternity and motherhood... promoting the increase in family size and reproduction of the Volk, psychological and material protection of the family...” amongst other educational benefits. Stepping away from the efforts of the Weimar Republic to get women to choose their own path in life, the Third Reich was actively encouraging women to return to their homes and tend to their families with the promise that the government would make sure that they did not have to suffer as they had previously. Given the prior decade, this was a compelling plan to the women.

The Nationalsozialistische Deutsche Arbeiterpartei (NSDAP) believed, as Mari- anne Weber did, that women were the keepers of the culture of Germany and that it was their sacred duty to transmit that culture to future generations. In a speech to German women, Walter Gross appealed to the women regarding innate feelings to procreate. “We speak of them only because for a few decades a crazy ear ignored, blasphemed, and mocked these greatest, most beautiful, and purest dreams of life...When we think back on our parents, grandparents, and great-grandparents, there were many children in the house.” He goes on to say that the Germans had the potential to be a dying people. The Third Reich wanted women to resume the role of motherhood and to help create the next generation of German citizens.

33 Kaes, 196
35 Translation: National Socialist German Workers’ Party (NSDAP), also referred to as the Nazi Party.
The Third Reich heavily promoted the role of motherhood. Gertrude Altmann-Gädke wrote about the importance of reinforcing the maternal instinct in young women. "You are entitled to be bursting with pride when you have blessed as many children as possible with life and a good upbringing!" Yet, it should be noted that while they were encouraging women to have as many children as possible, they preferred children that fulfilled the Aryan ideal - those free from birth defects and what the Third Reich considered mental or social defects. Authors of one of the four mandated biology books used for higher education in the Third Reich, Otto Stehe, Erich Stengel, and Maxim Wagner brought the concept of eugenics and perceived genetic superiority to the forefront in their policies regarding the accolades bestowed on families who procreate. "A careful selection process conducted by the Department of Health and the Racial Political Office of the NSDAP has seen to it that only those parents whose flock of children is truly a treasure to our Volk receive the Book of Honors. Large families that are genetically inferior or asocial are entirely ineligible." The Germans wanted to encourage the propagation of their people, but only if they were genetically superior.

According to Heinrich Himmler, the NSDAP believed that abortion should be illegal because it was a "major violation of the ideological tenets of the National Socialist worldview..." Stepping away from the arguments over Paragraph 218, the NSDAP was clear that the birth of more German children was desired from all able women. Women no longer had the rights to birth control, and punishment for abortions became much stricter. Women were encouraged to devote of their time and energy into producing the next generation of German citizens and were rewarded for their efforts. Mothers with large broods of children were recognized and rewarded by the Reich for their contributions.

Initiatives.

In addition to the benefits extended to women who were of child-bearing age, the Third Reich sought to expand their support by educating young girls in Germany. The education of women began when girls were young through organizations such as the Bundes Deutscher Mädel (BDM) and as their own branch of the Hitler-Jugens. Illustrated by a propaganda piece by Oberbannführer Stephan, through these social programs, the Third Reich was able to indoctrinate young minds with the pro-family propaganda. Programs such as these promoted the concept of “Glaube und Schönheit” amongst young women and girls. Günter Kaufmann’s propaganda piece was directed toward young women specifically. He wrote “taking pleasure in human beauty must emanate from feminine vanity and must be accompanied by a rigorous culture of physical hygiene and a certain elegance.”

40 Translation: League of German Girls (BDM)
41 Translation: Hitler Youth
43 Translation: Faith and Beauty.
They encouraged the athleticism and healthfulness of their members and encouraged the conformity of the young girls and women to fit the German ideal.

Carola Struve laid out the list of women’s freedoms under the Third Reich. The propaganda put forth by the Third Reich made it appear that they believed that women should be equal to men in all things; a quest that women had undertaken in 1918. But, further examination of documents such as the one by Carola Struve highlight the fact that they are enumerating only the laws of nature and the women’s relation to them. Two interesting points from that document go hand in hand: “That nature had placed the task of solving all ethical quandaries in the hands of women... That nature will not allow for any disobedience in the form of distancing oneself from her laws.”

Adolf Hitler would go a step further when he stated, “The word women’s emancipation is merely an invention of the Jewish intellect, and its meaning is informed by the same spirit. The German woman never has any need for emancipation during those times when German’s are truly leading the ‘good life’.” The women of the Third Reich seemed to be unaware, or just did not care, that their legal rights were being replaced with shallow promises and platitudes.

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**Conclusion**

The women of Germany were doomed from the start on their quest for equal rights. Following World War I, the seeds for revolutionary changes were not properly sewn. The emaciated economic state of Germany after the war left little time to equal the playing field for women and men. Although women had the power to use voting rights and access to political office to affect change, the social realities of the post-war period were an obstacle. For example, women were over-extended earning a living wage, maintaining the household, and raising children and could not take full advantage of their political rights. Women attempted to be different from previous generations, but in the end a conscious choice was made to relent and follow societal expectations. Hungry, disenfranchised, hurt, and neglected, the German woman felt that her progress had stalled and she became too tired to keep fighting.

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BIBLIOGRAPHY


The image of a female reader would not surprise present-day viewers, but this subject has not always been accepted with such ease. In early modern Europe, representations of women reading were often limited to specific types, and created with the intent to conform to gendered norms rarely in a manner that presented women as autonomous critical thinkers. A painting by Dutch artist Pieter Janssens Elinga circa 1660, *Reading Woman* (fig. 1), diverges from these earlier images of female readers. Elinga’s piece challenges the traditionally implied purposes of women readers portrayed in art, and simultaneously inserts itself within contemporary Dutch genre painting. While works that came before it focused on female readers with religious and moralistic motivations, Elinga’s subject in *Reading Woman* reads for her own pleasure and is presented in a quotidian, manner, making her activity both an everyday one and worthy of celebration.

*Reading Woman* offers a new approach to depicting women as readers, in contrast to earlier religious or devotional paintings. Depictions of women reading during the early modern period were often limited to religious themes. The image of a devotional female reader is found in Rogier van der Weyden’s *The Magdalene Reading* (fig. 2) fragmented from an altarpiece scene of the Virgin and Saints created before 1438. During the fifteenth century, the representation of reading and print was primarily restricted to male subjects, with only a few exceptions of highly ranked women and female saints depicted with books. In this piece we see Mary Magdalene, a saintly figure, adhering to this pattern. She is evidently a part within a wider religious scene, but is immersed in her reading of the Holy Scripture and removed from the activity around her. Despite being a fragment of another piece, the image captured makes evident that Mary is completely immersed in her reading as a religious experience. The composition of *The Magdalene Reading* puts Mary close to the viewer, yet she does not engage us in any capacity. Rather, her downward gaze towards the text, and the ornate dress, places Mary Magdalene firmly in her own space and

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thought. Her fine clothing and headpiece stress a saintly standing, while the appearance of the elaborately decorated book makes its sacred nature obvious, elevating her devotional activity. The theme of the saintly figure, deriving spiritual experience through the Holy Word, comprises an acceptable image type of religious female readers.

Other overtly religious depictions of women readers include Rowland Lockey’s portrait of Lady Margaret Beaufort (fig. 3). In this piece, the book is an apparent object of her devotion. With her eyes fixed ahead, Lady Beaufort is not actively engaged in reading, but the placement of the Bible signals her reverence to the word of God. The image of Lady Beaufort “with book,” becomes a symbol of her spirituality. The Netherlandish painting of Saint Barbara (fig. 4), created by an unidentified artist in the sixteenth century, continues this pattern of devout representation. Here, Saint Barbara is engaged with a religious text as a means of accessing God. Her divine and saintly status is made evident through the details in her heavily ornamented dress. Unlike Lady Beaufort, Saint Barbara is completely involved in her reading. Seated in a lavish interior, Saint Barbara pays no attention to the busy scene of activity outside her window, demonstrating total concentration on her reading. Although more thoroughly engaged with the text than Lockey’s Lady Beaufort, Saint Barbara still serves as an image of a highly devout and exceptional reader.

Beyond religious images, other depictions of female readers forge virtuous associations by using the book as a prop to represent subjects in an intentional manner. In these types of paintings, the book becomes a strategic tool used to demonstrate moral

2 Ibid., 58.
A similar Renaissance portrait, Laura Battiferri (fig. 6), created 1555-1560 by Agnolo Bronzino, also offers a moralistic representation of the subject forged through associations with reading. Laura is posed in a noble gesture, displaying a book of Petrarchan sonnets as a principled demonstration of character. Unlike Sofonisba’s Self-Portrait, Laura Battiferri is seen at profile, with a strong gaze ahead, completely disengaged from the viewer. While impersonal, the viewer’s focus is instead directed to the Petrarchan book Laura holds, her fingers spread to frame the text. Beyond the book itself, the sitter’s clothing is traditionally Catholic, the veil serving as another reference to her chastity and character. Yet Battiferri’s display of Petrarch’s work is more strategic and nuanced than the message conveyed through dress, and the book becomes a means of associating her standing in elite circles. Unlike religious images where books serve as objects of devotion, in these depictions of female readers show the text as an integral representation of character.

While Elinga’s Reading Woman is understood as anonymous, earlier images depicted women readers as popularized religious figures. As women’s reading was restricted to the realm of religious instruction during the early modern period, political and religious authorities encouraged literacy in a largely didactic manner. The books available to women during this period encouraged their chastity, as well as devotion and obedience to God. Images of identifiable, religious female readers reflect these societal expectations. Reading was not portrayed as an enjoyable activity but rather deemed necessary for religious devotion, represented to the average woman by idealistic and obscure figures. For example, Francisco de Zurbarán’s Saint Margaret of Antioch (fig. 7) shows the virgin martyr holding a book, and even marking her place in her reading, but clothed in a recognizable costume. Her distinct shepherding dress combined with the presence of the dragon makes Saint Margaret’s identity clear to viewers, alluding to the story of her martyrdom. The reading and reciting of devotional texts, then, becomes another critical aspect of her portrayal and identification. Zurbarán’s depiction of Saint Margaret with the book reflects national piety and cultural reverence for religious reading practices. The interpretation of the reading saint as an embodiment of Spanish devotional values distinguishes her not as an accessible individual, but rather an exemplary reader for female viewers.

Other images from this period, such as Baltazar Echave Orio’s depiction of the Annunciation in Virgin Leyendo (fig. 8), again capture the woman reader in the image of a figurehead, recognized by a distinctive

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1 Ibid., 60.
2 Ibid.
3 Merry Wiesner-Hanks, Women and Gender in Early Modern Europe (Cambridge: Cambridge University Press, 2008), 144.
4 Ibid., 150.
6 Inmann, Forbidden Fruit, 66.
iconography. The reading Virgin is positioned close to viewers, and compositionally, the portrait-like treatment further heightens her proximity. The placement of the lilies, strewn across the table, also functions to identify the Virgin Mary. Her complete immersion in the sacred text is understood through her eyes, fixed to the page, and graceful hand that actively reaches to turn the page. The Virgin herself is glorified through extraordinary decoration, from her embellished clothing to her ornamented furniture. The crown serves as an ultimate suggestion of a monarchical, divine power. While this Annunciation scene clearly promotes women’s active religious reading, the Virgin’s decoration elevates her literacy beyond the quotidian and makes the activity especially impressive.

Dutch masters depict the subject of the female reader with similar grandeur, creating an air of inaccessibility surrounding literary activity. In Vermeer’s Allegory of Faith (fig. 9), reference to women’s reading is found in the prominent placement of an open Bible. Although we presume that this woman is in the process of reading the Holy Word, the piece is less about the act of her reading and more intent on demonstration of devotion, as suggested by her surroundings. Various religious instruments and symbols frame the woman, who is in fact an allegorical figure in realistic garb. The scene includes a chalice and cross, a crushed snake and strewn apple in the foreground, and a large painting of the crucifixion framed on the rear wall. Vermeer and Elinga’s paintings share similar characteristic representations of shadow and light, as well as points of reflection Vermeer’s subject gazes upwards to a glass orb, while Elinga’s reader sits beneath a small mirror. However, these paintings are drastically different in ornamentation and concept. The many devotional objects that surround Vermeer’s reader make it clear that she is an allegory, and not a real individual like the female-reader in Elinga’s work. Vermeer’s piece further suggests vast ostentation and wealth, as demonstrated by the woman’s fine dress, jewelry, and the lavish interior of the scene. The complexity of textile work and the manner in which it is displayed, including the pulled-back curtain and the elevation of the detailed carpet, create an air of exclusivity to this woman’s experience. Knowledge of Dutch interiors during this period indicates that oriental style carpets were rarely placed on the floor, making Vermeer’s display of textiles unusual. Also of note is the black and white marble floor, which, as C. Willmijn Fock concludes, was typically confined to a small narrow space and not entire rooms, even in the most elite Dutch homes. With reference to these norms of interior spaces

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9 Ibid., 74.


11 Ibid
during the period, Vermeer’s *Allegory of Faith* becomes a marked symbol of exclusivity. The woman’s gesture towards her heart and unstable posture, leaning back towards the table, represent an experience of being overwhelmed by faith. This scene of ostentation makes the woman herself an image of devotion, elevating those who are equally moved by the word of God. While the dramatic interior and rich decoration are critical to understanding of *Allegory of Faith* as an image of a devout female reader, Elinga’s *Reading Woman*, instead, represents a woman who is engaged in reading without deeming any significance to her surroundings.

The notion of fulfillment and personal pleasure in Elinga’s work is made clear by the subject’s absorption in the book and disengagement with any of the objects around her. Given that the Dutch Republic saw immense material growth and a higher standard of living compared to other European nations between the seventeenth and eighteenth century, Elinga’s decisive exclusion of any contact between the subject and material commodities is significant. Dutch economic and cultural advancement was typically translated in art through the depiction of luxurious commodities, some of which we see in Elinga’s work including paintings, a mirror, upholstered furniture, and chinaware. Yet his subject is absorbed in her book. Other artists, such as Pieter de Hooch, depict women engaged with these items to create a domestic genre scene that highlights Dutch prosperity and societal values through interaction with goods. For example, in *Interior with Women beside a Linen Cupboard* (fig. 10), De Hooch depicts a housewife who takes great care in storing linens in an impressive cupboard. The room contains various signs of an abundant material culture, including paintings, chinaware, textiles, and a woven basket. Departing from these previous depictions of Dutch interiors and domestic life, Elinga’s *Reading Woman* offers a unique image of an ordinary woman who reads for her own enjoyment, without the distraction of household activity or material display.

In *Reading Woman*, Elinga creates a strong compositional divide between either side of the canvas, separating furniture and items of luxury from the subject herself. Elinga’s woman is not only separate from her belongings in a physical sense, but also devotes unwavering attention to reading. In contrast to earlier images of domestic scenes or female reading, we observe this woman from the back, completely engaged in her activity. This approach to the subject prevents direct gaze or judgment by the viewer. While a great deal of scholarship has characterized Dutch domestic genre painting as promoting a masculine gaze and as moralizing in its agenda, Martha Moffitt Peacock has argued that an interest in depicting women’s lives also existed beyond the conventional interpretation. Peacock suggests an alternate, respectful view, which stressed the significance of women’s domestic roles rather than their subjection.

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12 Ibid., 73.


14 Ibid., 48.
to home and family life. Roghman’s *A Young Woman Ruffling* (fig. 11) exemplifies this desire to portray women within the domestic realm as both important and diligent. Approaching her from a profile allows a view of her work, and makes the woman an individual, anonymous figure celebrated for her contributions. As Peacock suggests, Roghman’s prints highlighted women’s critical contributions to domestic work, presenting them with new visibility and stressing their significance.

Though Elinga undoubtedly was influenced by the same messages that Roghman’s work exemplifies, his approach to the reading woman is markedly different from hers. Roghman’s woman possesses her own book, placed directly in front of her on the table, yet still there is a stronger correlation to her responsibilities within the domestic sphere. Elinga’s piece, in contrast, subverts this role by depicting a woman enjoying the act of reading in of itself, and perhaps, as a break from her duties. We intrude on this private moment as viewers, approaching her from behind to encounter the signs of her escape, including the discarded shoes and her position at the very end of a long room. The woman’s relaxed posture in her chair, feet stretched forward, suggests a moment of reprieve. The woman sits in the rear corner of the composition, yet the viewer is still drawn to her activity through the bright color of her red jacket and brilliant white skirt. The gentle light that streams down from the window also brings the reading woman into focus.

As Muizelaar and Phillips write in *Picturing Men and Women in the Dutch Golden Age*, many Dutch domestic genre paintings captured female subjects in the role of motherhood, and forged associations with feminine virtue. In de Hooch’s *Interior with Mother Delousing Child* (fig. 12), we see an intimate domestic moment that is similar in feeling to Elinga’s piece, but principally a celebration of motherhood. The mother in this painting, like Elinga’s reader, wears a red jacket that draws focus to her position within the room. She is approached from the side, providing a profile view of her duties as a mother. Elinga, then, inserts *Reading Woman* into this Dutch domestic tradition, which celebrates women’s activity within the private sphere. However, his reader resides in a moment of her own respite and pleasure, a subversion of the matriarchal figure and her associated responsibilities. Elinga also achieves a sense of intimacy in his piece by placing the woman at the end of a long room, with multiple barriers between the viewers and subject. The muted interior colors offer a sense of quiet and emphasize our perspective as onlookers to a personal moment. Her cast-off shoes mark an absence of formality and composure, placing the woman within a personal space, both mentally and physically.

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15 Ibid., 57.
Earlier images created by Dutch artists such as Jan Steen’s *A Woman at her Toilet* (fig. 13) use a similar compositional structure to evoke the notion of intrusion into a private scene. A monumental archway decisively separates the subject’s space from that of the viewer’s, and the discarded items in the foreground create another form of boundary. Elinga uses these same compositional techniques but without the grand archway - which seems especially bombastic - to evoke a sense of intimacy and intrusion. Yet his female subject is not exposed in the flesh like the woman at her toilet. Instead, viewers are privy to a personal moment of leisure and intellect.

Other representations of women in Dutch art moved beyond the home to include reference to women’s active participation in the public sphere. Women in the seventeenth century Netherlands possessed a great deal more societal freedom and influence than their European counterparts. Even within the patriarchal structure of the Dutch Republic, contemporary discourse and imagery was relatively sympathetic to women and gave them social significance.  

Johannes Cornelisz Verspronk’s painting of *The Regentesses of the St. Elisabeth Hospital in Haarlem* (fig. 14) reflects the importance and appreciation of women’s public roles. Presenting four women as if in the midst of a business meeting, their financial book opened on the table, Verspronk’s image of female readers demonstrates their significance in society. Each woman is portrayed in a realistic and individual manner, not as any idealized type. The woman on the right almost challenges the viewer, gesturing towards the book as an invitation to inspect her work on the hospital’s official records. In Verspronk’s painting, therefore, the book and the act of reading become a means for these women to demonstrate their contributions to society at large. Elinga’s depiction of the female reader is certainly influenced by this same praise and respect for women that was prevalent throughout Dutch culture at this time, however, his woman reads with different intention from the *Regentesses.*

Elinga’s subject in *Reading Woman* deviates from the celebration of women for their contributions to society and the domestic sphere. The *Reading Woman* places the subject in a position of leisure, reading for intrinsic purpose and pleasure. This woman even subverts the active female reader type presented in earlier images, like the altarpiece fragment of Mary Magdalene, the painting of Saint Barbara, or the *Virgin Leyendo.* Elinga’s reader is a universal female figure, placed in a normalized domestic setting, not as an extolled social contributor or exemplary figurehead.

The *Reading Woman* demonstrates a new appreciation for the subject of an engaged female reader by elevating her activity within a familiar setting. This celebratory understanding of Reading Woman is made evident by Elinga’s rendering of natural light in the piece. The light streaming into the room from the upper windows falls gently onto the reader’s white

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18 Peacock, “Domesticity in the Public Sphere,” 45.
19 Inmann, *Forbidden Fruit,* 69.
cap, and onto floor just beyond her outstretched feet. However, direct sunlight was often a rarity, as a result of the typical layout of Dutch homes during this period and particularly during the long and severe winters.\(^{20}\) This unrealistic manipulation of light, combined with the manner in which it hits the woman’s cap, conveys an enlightened quality. It suggests Elinga’s celebration of the woman reader, as well as her own critical thinking and enjoyment derived from the activity. Elinga’s\textit{ Reading Woman}, therefore, becomes a part of the Dutch genre tradition in which the private sphere of a woman’s world is celebrated. Through this piece, Elinga acknowledges and engages with the notion that female leisure reading is a legitimate aspect of the domestic sphere, and one worthy of depiction.

Particularly for a male artist, Elinga’s painting presents his subject in an unusually respectful manner. Scholarship on Dutch domestic genre painting has suggested that the artists who painted interior scenes and the patrons who coveted them were overwhelmingly male, making specific types of images precedent. Loughman argues that greater value was placed on symbols of status and honor, or on images that reinforced notions of familial domesticity and nurturing environments.\(^{21}\) These genre paintings may appear to capture a snapshot of life in the Dutch Golden Age, but in reality, offer a constructed reflection of the masculine gaze.\(^{22}\) Elinga’s\textit{ Reading Woman} subverts these traditional types in its absence of allusions to the subject’s societal or domestic contributions, and rather celebrates her moment of personal leisure.

The very act of this woman reading is itself worthy of consideration, as the image of female readers has often elicited sustained and erotic attention by male artists throughout history. Conlon suggests the scene of a woman reading can be interpreted as a threat to masculinity, as it placed capacity for pleasure and wisdom literally into a woman’s own hands, rather than under male possession.\(^{23}\) Conlon also references the dichotomy that exists along gendered lines between passive and active - those who are seen and those who control their gaze - and how this translated into art.\(^{24}\) However, Elinga’s\textit{ Reading Woman} breaks from norms of passivity because its subject is actively engaged in her own activity, and the viewer’s perspective from behind does not allow for a possessive gaze. She is presented as having her own desire and reading for personal pleasure, in clear variation from previous artistic conventions.

\textit{Reading Woman} challenges other perceived dangers in depicting women actively reading. Mary Ellen Lamb argues that the very image of the woman reader-consumer in the late sixteenth century was threatening and dangerous in its acknowledgement of women’s newly found self-determination.\(^{25}\) To address women as active readers was to acknowledge their ability to respond to text and produce personal interpretations, to think critically, to make judgments, and ultimately, to exercise a degree of autonomy that challenged their status within patriarchal society.\(^{26}\) Pieter Jansen’s Elinga’s depiction of a woman reading marks a clear break from earlier imagery and fears about the female reader-consumer. The image is neither threatening nor disconcerting given the scene’s familiar domestic setting and comforting quietness. Within what initially appears to be a typical seventeenth century

\begin{itemize}
  \item Ibid., 97.
  \item Muizelaar and Philips, \textit{Picturing Men and Women}, 112-113.
  \item Ibid., 44
  \item Ibid., 18.
\end{itemize}
Dutch scene, an act of intellectual freedom and self-fulfillment emerges.

In Elinga’s *Reading Woman*, an unprecedented intention of the female reader is suggested - that of personal pleasure and leisure. Elinga’s work appears to fit neutrally into the tradition of Dutch art, yet *Reading Woman* is also subversive, containing contradictions to both norms of Dutch domesticity and female reader types. She is celebrated as an active reader, but placed within a normalized Dutch interior. Distinct from earlier images with religious and moralistic undertones and as a subtle challenge to customs of Dutch domesticity, Elinga’s reading woman is depicted in a respectful and quotidian manner. A stimulating intellectual act and reprieve from feminine duty becomes worthy of celebration in *Reading Woman*. 
BIBLIOGRAPHY


