

TOWARD A NEW CIVIL RIGHTS FRAMEWORK

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The problem of racial discrimination has reached a point of equipoise. When one examines closely the lived lives of citizens of color across some of the most pertinent evaluative domains, one clearly finds that citizens of color are not enjoying the full benefits of American citizenship. African Americans, Latinos, and Native Americans lag behind Whites and sometimes Asian Americans on almost all relevant socio-economic indicators. What it means to be an American citizen is different for most folks of color than for most Whites. Looking at the gaping racial disparities on most socio-economic indicators, there are clearly two classes of citizens: Whites and coloreds. Very few individuals would dispute the fact that we have a race problem.

However, with the elimination of de jure discrimination presaged by constitutional and statutory commitments to formal racial equality, we seem to have exhausted the possibilities of positive law, including constitutional lawmaking, to achieve greater racial equality. Simple legal prescriptions, statutory and constitutional, are most effective in precluding overt intentional racial discrimination and in eliminating de jure discrimination. Law is significantly less effective when put to more offensive use—that is, as a sword of racial equality—as opposed to defensive use—that is, as a shield to defend racial equality measures.

It is then no surprise that the civil rights movement is dead and that a racial malaise has set in. We have very little to say about race because we have reached a point of equilibrium that is destined to rigorously enforce formal equality but never reach actual racial parity. Actual parity among the races is elusive because it would demand a commitment by the state to dismantling the structural underpinnings of racial exclusion. This is a commitment that does not currently exist from the positive law framework and is not currently on the public policy agenda.

In her most recent piece, *The Architecture of Inclusion: Advancing Workplace Equity in Higher Education*, Professor Susan Sturm provides much needed guidance toward destabilizing this perverse equilibrium.¹ Building upon previous work that identifies the structural pathologies of discrimination,² Professor Sturm turns her focus to higher education to reveal the micro-structural elements of inclusion. She focuses in particular on gen-

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¹ Susan Sturm, *The Architecture of Inclusion: Advancing Workplace Equity in Higher Education*, 29 HARV. J.L. & GENDER 247 (2006).

² Susan Sturm, *Second Generation Employment Discrimination: A Structural Approach*, 101 COLUM. L. REV. 458 (2001).

der inclusion, in the university as both an educational institution and as a place of employment. Sturm develops a framework that re-conceives the role of the state and empowers institutions to address the problem of gender disparities.

An important implication from Professor Sturm's piece is the realization that the current legal framework is incapable of redressing persistent racial inequalities.³ If the post-*Brown* experience has proved anything, it has certainly proved the limitations of courts and constitutional law (and to a significantly much lesser extent, positive law more generally) in actuating racial equality. Although constitutional law (and by extension courts) was capable of articulating a norm of racial equality, it has not been capable of vigorously enforcing that norm. Indeed, as Professor Sturm notes, the law itself, in particular constitutional law, might be an impediment to change.⁴ Not only are courts limited in their ability to enforce equality, they have also severely limited the ability of the state to vigorously implement a more aggressive and expansive conception of racial inclusion.

The point here is that even if progressives receive everything that they want from the courts, the problem of racial exclusion is too intractable at a structural and institutional level to be resolved by courts. Professor Sturm's paper is built upon the premise that a paradigm shift is in order and long overdue.⁵

In this Response Essay, I use Sturm's framework to think about the macro-structural elements of racial exclusion. Part I of this Review identifies what I view as the key moves of Sturm's approach. Some of these moves are explicit, others less so. These moves include: (1) a focus on the structural determinants of exclusion; (2) a conceptual shift from equality to citizenship; and (3) perhaps most profoundly, a much-needed emphasis on the importance of socio-economic institutions as guardians of inclusion and exclusion. Part II explores the utility of Sturm's framework for thinking about the problem of race and citizenship. Two quick caveats before proceeding. First, while Professor Sturm's focus is on gender, mine will be on race. Leaving aside this important difference, the structural elements of exclusion that she identifies are largely transferable to race. Second, while Professor Sturm is concerned with micro-structural elements of exclusion, I am interested in identifying the macro-structural elements.

I. LAW'S FAILURE

For those deeply concerned about the persistence of gender and racial inequality, the crucial question of the twenty-first century is how to achieve full inclusion in the absence of explicit raceconscious measures by the state

³ Sturm, *supra* note 1, at 248–49.

⁴ *Id.* at 249, 260.

⁵ *Id.*

and within constitutional limitations. As Professor Sturm's paper makes clear, the civil rights movement has stalled.⁶ It has stalled in large part because the movement has relied, to its detriment, upon law and the modern legal regime to promote equality. Progressives were seduced by the tantalizing vision of a Supreme Court, best exemplified by *Brown v. Board of Education*,⁷ that would order the eradication of racial inequality and it would be so. *Brown* and its progeny promoted a court-centric framework of racial equality.

In retrospect, it is important to acknowledge that proponents of racial equality were wrong on a number of counts. To be sure, courts served an important and critical function by (1) articulating a norm of racial equality, (2) serving as catalysts for change, and (3) removing legally-imposed boundaries that served as markers of second-class citizenship. However, this was about as much as courts could do in the fight for racial equality. Because of this court-centric approach, progressives underestimated the intractability of racial inequality and overestimated the capacity of courts as agents of change. Progressives assumed that *Brown* represented the beginning of a court-driven approach to racial inclusion; rather, *Brown*, in hindsight, was its zenith.

To be clear, the principles that *Brown* stands for, though contested, have had a tremendous impact on the lives of people of color in the United States. The same can be said, more generally, with respect to the liberal activism of the Warren Court on race issues. The progress on race that is attributed to the civil rights movement and culminated in *Brown* is real and ought to be celebrated. We have indeed come a long way. Nevertheless, we have a long way to go.

Consider some basic socio-economic indicators. Figures 1–3 compare the status of Whites, African Americans, Asian Americans, and Native Americans with respect to three basic health care categories: infant mortality, percent of individuals that lack health care coverage, and percent of individuals that are in fair or poor health by race. As Figure 1 depicts, African Americans have the highest rate of infant mortality among the racial groups examined.⁸ African-American mothers experience almost fourteen deaths per 1,000 live births.⁹ This rate is three times more than the rate for Asian Americans and more than twice the rate for Whites and Latinos.¹⁰ Native

⁶ Sturm, *supra* note 1, at 248.

⁷ *Brown v. Bd. of Educ. of Topeka*, 347 U.S. 483 (1954).

⁸ Graph in Figure 1 created from data in: FEDERAL INTERAGENCY FORUM ON CHILD AND FAMILY STATISTICS, CTRS. FOR DISEASE CONTROL & PREVENTION, *Table HEALTH7 Infant Mortality: Death Rates Among Infants by Detailed Race and Hispanic Origin of Mother, Selected Years, 1983–2003*, in AMERICA'S CHILDREN IN BRIEF: KEY NATIONAL INDICATORS OF WELL-BEING (2006), available at <http://www.childstats.gov/americaschildren/xls/health7.xls> (infant deaths per 1,000 live births for 2003).

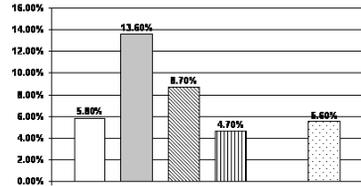
⁹ *Id.*

¹⁰ *Id.* The infant mortality rate for Latinos is misleading because of the inclusion of Puerto Ricans and Cuban Americans with all others of Hispanic descent. Puerto Ricans

Americans have the second-highest rate of infant mortality; they experience an infant mortality rate of almost nine deaths per 1,000 live births.¹¹

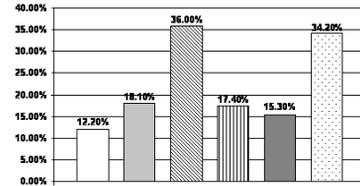
HEALTH DATA INDICATORS BY RACE

Figure 1: Infant Deaths per 1000 Live Births (2003)



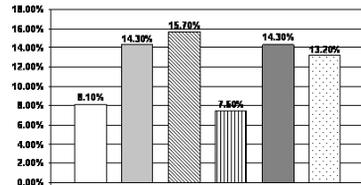
Source: Forum on Child and Family Statistics, *America's Children in Brief: Key National Indicators of Well-Being, 2006*

Figure 2: Percent Lack of Health Care Coverage – All Ages (2002–04 Average)



Source: Nat'l Ctr. for Health Statistics, Ctr. for Disease Control and Prevention, *Health Data for All Ages (2004)*

Figure 3: Percent in Fair or Poor Health – All Ages (2002–04 Average)



Source: Nat'l Ctr. for Health Statistics, Ctr. for Disease Control and Prevention, *Health Data for All Ages (2004)*

White non Hispanic	African American	Native American or Alaska Native
Asian	Native Hawaiian or Pacific Islander	Hispanic or Latino

With respect to the availability of health care coverage and poor health, African Americans, Latinos, and Native Americans are again at the bottom of the barrel. As Figure 2 shows, 36% of Native Americans, 34% of Latinos, and 18% of African Americans are without health care coverage.¹² This compares with 12% of Whites, 15% of Native Hawaiians, and 17% of Asians.¹³ With respect to health quality by race, as Figure 3 indicates, almost 16% of Native Americans reported being in fair or poor health.¹⁴ The numbers were similar for Blacks, Native Hawaiians, and Latinos, which re-

have an infant mortality rate of 8.2 deaths per 1,000 live births. This rate is closer to the rates of Native Americans and African Americans. Cuban Americans, on the other hand, experience an infant mortality rate of 4.6 deaths per 1,000 live births, a rate lower than that experienced by both Asian Americans and Whites. *Id.*

¹¹ *Id.*

¹² Graph in Figure 2 created from data in: NAT'L CTR. FOR HEALTH STATISTICS, U.S. DEP'T OF HEALTH & HUMAN SERVS., HEALTH DATA FOR ALL AGES (2004), http://www.cdc.gov/nchs/health_data_for_all_ages.htm (follow "Health Care Access and Use" hyperlink; then follow "Health Insurance: lack of coverage, persons under 65 years of age, US, 2002–2005" hyperlink) (statistics are percentage averaged for 2002–2004).

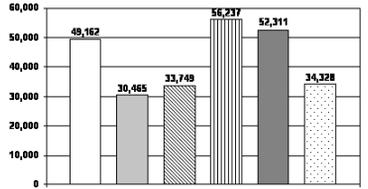
¹³ *Id.*

¹⁴ Graph in Figure 3 created from data in: NAT'L CTR. FOR HEALTH STATISTICS, U.S. DEP'T OF HEALTH & HUMAN SERVS., HEALTH DATA FOR ALL AGES (2004), http://www.cdc.gov/nchs/health_data_for_all_ages.htm (follow "Health Status and Disability" hyperlink; then follow "Health Status, all ages: US, 2002–2005" hyperlink) (statistics are percentage averaged for 2002–2005).

ported 14.3%, 14.3%, and 13.2%, respectively.¹⁵ By comparison, Asians and Whites reported 7.5% and 8.1%, respectively.¹⁶

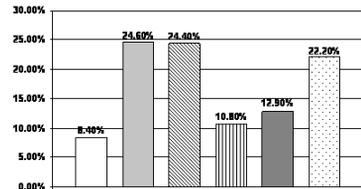
ECONOMIC DATA INDICATORS BY RACE

Figure 4: Median Household Income (Dollars) (2003–04 Average)



Source: Carmen DeNavas-Walt et al., U.S. Dept. of Commerce, U.S. Census Bureau, Income, Poverty, and Health Insurance Coverage in the United States: 2006

Figure 5: Percent of Population Below Poverty Level (2003–04 Average)



Source: Carmen DeNavas-Walt et al., U.S. Dept. of Commerce, U.S. Census Bureau, Income, Poverty, and Health Insurance Coverage in the United States: 2006

White non Hispanic	African American	Native American or Alaska Native
Asian	Native Hawaiian or Pacific Islander	Hispanic or Latino

Figure 4 provides some basic economic data by race. As Figure 4 depicts, on average, African Americans, Latinos, and Native Americans have median household incomes of \$30,000, \$34,000, and \$33,000 respectively.¹⁷ By contrast, on average, Whites and Asians have median household incomes each year of \$49,000 and \$57,000, respectively.¹⁸ The White household income is 1.6 times that of the African-American household income. Consistent with the data on income, the data on the percent of individuals below the poverty line by race, not surprisingly, reflect similar racial disparities. As Figure 5 shows, 24% of Native Americans, 25% of Black Americans, and 22% of Latinos live below the poverty line.¹⁹ The percent of Native Americans, Blacks, and Latinos below the poverty line is more than three times the rate of Whites, which is 8%, and more than twice that of Asian Americans, which is 11%.²⁰

In *The State of Black America 2006*,²¹ the annual report on the socio-economic status of African Americans published by the Urban League, Marc Morial, the President of the Urban League, provides the results of the Urban League's Equality Index, a cumulative compilation of the status of African Americans in comparison with Whites in the areas of economics, health,

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ Graph in Figure 4 created from data in: CARMEN DENAVAS-WALT ET AL., U.S. DEP'T OF COMMERCE, U.S. CENSUS BUREAU, INCOME, POVERTY, AND HEALTH INSURANCE COVERAGE IN THE UNITED STATES: 2004, at 6 tbl.2 (2005), available at <http://www.census.gov/prod/2005pubs/p60-229.pdf> (statistics are average for 2003–2004).

¹⁸ *Id.*

¹⁹ *Id.* at 12 tbl.4.

²⁰ *Id.*

²¹ THE NATIONAL URBAN LEAGUE, *THE STATE OF BLACK AMERICA 2006: THE OPPORTUNITY COMPACT* (2006), available for purchase at <http://www.nul.org/stateofblackamerica.html> [hereinafter *THE STATE OF BLACK AMERICA*].

education, social justice, and civic engagement.²² Morial reported that for the past three years, the Index has calculated the status of African Americans as about 0.73 of Whites: “the U.S. Constitution counted an African American as 3/5 of a person for purposes of taxation and state representation in Congress, an Index value of 0.60. Today, African Americans’ index value stands at 0.73—0.13 improvement over the last 217 years!”²³

The lived lives of citizens of color, particularly African Americans²⁴ and Native Americans, but also Latinos and sometimes Asian Americans, differ significantly from the lived lives of most Whites. An examination of relevant socio-economic indicator reveals a consistent inequality. Predictably and persistently, certain groups of American citizens do less well on critical socio-economic indicators than others. Despite the end of de jure discrimination, we still have two classes of citizens: the first class is mainly White and the second class is mainly Black and Latino.

II. THE IMPORTANCE OF SOCIO-ECONOMIC INSTITUTIONS

One of the most important moves in Professor Sturm’s paper is the recognition that socio-economic institutions must be necessary and critical partners in the struggle for full inclusion. In the old civil rights paradigm, the state was solely responsible for implementing racial inclusion. This was in part because the state was viewed as the primary discriminator, and partly because our legal framework maintains a substantial distinction between state action and private action.

The old paradigm suffers from two problems. The first, as noted above, is that the Supreme Court’s interpretation of the Equal Protection Clause has severely constrained the ability of the state to promulgate an aggressive vision of racial inclusion.²⁵ Second, by focusing on the state as both primary offender and defender of equality norms, the old paradigm ignored the fact that people of color interacted with a large number of non-state (and sometimes quasi-state) institutional actors. These institutional actors were both potential offenders and possible defenders of equality norms.

The genius of Professor Sturm’s article is she helps us understand that full equality can never be achieved within the confines of a paradigm that relies so totally upon the state. She turns our attention from the limitations on the state to the possibilities of socio-economic institutions. She demonstrates this point by articulating and cataloguing very meticulously in one domain how to achieve greater inclusion (defined as reducing the relevant

²² Marc H. Morial, *The National Urban League Opportunity Compact*, in *THE STATE OF BLACK AMERICA*, *supra* note 21, at 9.

²³ *Id.*

²⁴ The focus of this Essay is on African Americans in large part because African Americans consistently find themselves on the bottom of the rung, and also because African Americans have served as the paradigmatic “other” in American society.

²⁵ *Id.* at 260.

gap between Whites and people of color) by using a quasi-state institutional actor.²⁶ As Professor Sturm shows, institutions matter because they are the primary entities with which folks of color interact.²⁷ If socio-economic institutions can be induced to serve as promoters of inclusion norms, it becomes possible to improve the lived lives of citizens of color. Institutions, as opposed to the state, become the unit of analysis and those interested in improving the lives to citizens of color can address the problems of exclusion at the level at which they exist.

Professor Sturm has outlined the contours of an institutional approach to inclusion. To build upon her approach, future work will need to continue mapping out the territory. Researchers can begin by identifying which socio-economic institutions are critical and must be part of the equation if we are to have a society in which the goal of full inclusion is realized. That is, researchers should develop criteria to determine whether there are particularly critical institutions that ought to be part of an initial wave of study. For example, it might be the case that educational institutions are critical socio-economic institutions in the fight for full inclusion. A similar argument can be made about workplaces. From a different perspective, researchers might focus on institutions where there are significant gaps between the ideal of full inclusion and the reality of exclusion. Alternatively, it might also be useful to examine institutions where one can make a significant impact with minimal investment.

In addition, further work can be done by identifying portable and non-portable aspects of inclusionary norms as applied to socio-economic institutions. For example, using Professor Sturm's case study, it is worth inquiring whether public universities are sufficiently similar to private universities that we can expect like results in the private university context. Or one can inquire whether we can expect similar success at the elementary public school level as in the public university level. Switching domains altogether, one might ask whether universities are like hospitals, such that one might expect similar success if the framework is imported from the university setting to the hospital setting, etc. Mapping the terrain here will be tedious but necessary work to achieve full inclusion at the critical points of exclusion. Professor Sturm has provided a wonderful model.

III. TAKING CITIZENSHIP SERIOUSLY

Lastly, the third critical move in Professor Sturm's paper is a linguistic shift from the concept of equality to the concept of citizenship. The move to citizenship is significant for three reasons.

²⁶ *Id.* at 249–50.

²⁷ *Id.*

First, Professor Sturm introduces the critical concept of institutional citizenship into the equation.²⁸ Institutional citizenship is the idea that socio-economic institutions have a stake in the social order beyond their immediate corporate or institutional purpose. Institutional citizenship provides both an internal and an external justification for action by socio-economic institutions. When institutions ask themselves why they ought to care about racial inclusion, answers might vary. Certainly, almost all will have an economic justification—inclusion is good for the bottom line. But they can also have a political theoretical justification: as citizens (though citizens perhaps of a slightly different sort), socio-economic institutions bear responsibility for being agents of inclusion within the spheres under their control.

Encouraging institutions to think of themselves as institutional citizens may be the most promising avenue for achieving full inclusion. Although most socio-economic institutions may be profit-oriented, they may not, as a normative matter, want to be viewed as passive agents of exclusion. Consider the fact that the push for same-sex domestic partner benefits is not coming from the state or really organized outsider activists but from institutions themselves. Admittedly, providing domestic partner benefits might make good business sense; but we should encourage institutions to hold themselves accountable for the impact that their behavior has on the polity.

Similarly, in Minnesota, leading law firms and corporations have come together to create an entity called Twin Cities Diversity in Practice in order to attract and retain attorneys of color.²⁹ These firms are not being driven by “civil rights activists” or by the threat of legal sanctions. They are driven by their sense of their role in the fight for full inclusion. Thus, there is something to be said for thinking of institutions as institutional citizens that are obligated to be agents of inclusion.

There is more to be said about the concept of institutional citizenship. Professor Sturm identifies the funding role of the state in providing an incentive for institutions to be inclusive.³⁰ It is worth thinking about other roles that the state might play that do not rely upon the threat of legal sanction to incentivize inclusionary behavior.³¹ The point here is to note this development as extremely useful and to encourage further exploration of its meaning.

The move to citizenship more broadly (not institutional citizenship but the concept of citizenship itself) is significant for a second reason. As a matter of linguistic rhetoric, the idea of citizenship seems to connote and

²⁸ *Id.* at 301, 323.

²⁹ See Twin Cities Diversity in Practice, <http://www.diversityinpractice.org/> (last visited May 28, 2007).

³⁰ Sturm, *supra* note 1, at 327–28.

³¹ For example, might a public university be justified in administering a racially exclusive scholarship that is provided by a private institution to enable students of color to attend the university? The administration of the scholarship, by reducing one transaction cost, might incentivize the private actor, by providing the scholarship, to view itself as an agent of inclusion.

evoke a normative responsibility more so than the idea of equality. I am not quite sure about this, but it seems to me that equality seems to be more backward-looking than forward-looking. This is why we talk about and take seriously the concept of equality of opportunity, but disdain the more forward-looking, valenced conception of equality of results.

This same problem does not seem to exist with the concept of citizenship. The idea of citizenship lends itself, more so than the idea of equality, to thinking more broadly about problems of exclusion and inclusion. Consider a brief example. African-American mothers experience about fourteen deaths per 1,000 live births.³² This is a rate that is three times more than the rate for Whites. Taking this example, we can constructively inquire about what it means to be a black citizen in a polity where the lives of African-American children have less value than those of White children. Or, we can query whether Latinos, Native Americans, and African Americans are full citizens when their average individual incomes are half that of Whites.

The concept of equality does not provide us with much purchase on those questions. Once formal equality is established, equality rhetoric may not have anything else to contribute to the discussion. By contrast, when one examines these and other racial disparities, one can begin to recognize the differential classes of citizenship and then ask whether the polity has an obligation to its citizens to reduce, if not eliminate, the tiers. The very idea of citizenship connotes obligation. Citizenship enables to ask about the core content of the government's obligation to individuals as well as the minimum that we owe to one another as members of the same polity.

This is a fundamental difference between the backward-looking concept of equality and the forward-looking concept of citizenship. As a matter of rhetoric, we might be able to compel the polity to take disparate impact among the races more seriously by using the language of citizenship rather than the language of equality. Put differently, can one really say that Blacks and Whites are full citizens of the polity where the experiences of Blacks and Whites differ dramatically on all relevant socio-economic indicators? I am surmising that if the concept of citizenship means anything, it must compel at least an investigation into the distinctions among the races.

I am ready to admit that these conceptions may be context-dependent social constructions. That is, perhaps in a different society, equality might do more work compared to citizenship than it does in this society. It may be the case that our conception of equality is not useful because in this society it is so fixed and backward-looking. On the other hand, as Peter Westen argued, it may also be the case that equality is such an empty concept that we should never have expected it to do the work that needs to be done in order to achieve full racial inclusion.³³

³² See *supra* notes 8–10 and accompanying text.

³³ Peter Westen, *The Empty Idea of Equality*, 95 HARV. L. REV. 537, 542 (1982).

This leads us to the third reason why this move is significant. Unlike equality, the concept of citizenship is much less defined by and thus less constrained by constitutional doctrine. If this is true, it means that a focus on citizenship instead of equality might reinvigorate the moribund legal framework. I do not think that constitutional doctrine can be fashioned to serve as a sword for achieving racial inclusion, but it might serve as a shield.

Take *Grutter v. Bollinger*³⁴ as an example. In *Grutter*, Justice O'Connor implicitly recognized that if citizens of color are to be truly full citizens of the polity with the norm of inclusion that the concept entails, then the polity must be sufficiently responsive to the needs of citizens of color.³⁵ The state is permitted to do more than establish race-neutral admissions criteria. As full citizens of the polity, citizens of color must be permitted to aspire to be lawyers and realistically expect to matriculate at the best legal institutions.³⁶

This concept of citizenship gets us beyond the confining framework of equality: viz., whether the state is being race-conscious. Citizenship enables us to examine the lived lives of citizens of color and to ask whether the state has an obligation to act to change their reality. The constitutional shift to citizenship can serve as a defense for the state when it so acts or when it acts in conjunction with private actors. Citizenship shifts the inquiry from one about means to one about results. It shifts the focus from one primarily on White citizens (victims under the equality construct) to citizens of color (objects under the citizenship construct).

There is more to be said about citizenship. It would be useful to articulate the difference among political citizenship, institutional citizenship, and social citizenship. Suffice it to say for now, given the limits of equality discourse, it is worth exploring whether a different conceptual vehicle might help us think about and resolve some of the obstacles that citizens of color face in this polity.

IV. CONCLUSION

In the late 1970s, Professor Kenneth Karst wrote a seminal article on citizenship and the Constitution.³⁷ In that article and a series of subsequent articles, Professor Karst explored the constitutional principle of equal citizenship and what that might mean for inclusion.³⁸ Unfortunately, the civil rights community failed to grapple with and build upon the ideas expressed by Professor Karst.

³⁴ *Grutter v. Bollinger*, 539 U.S. 306 (2003).

³⁵ *Id.* at 331–33.

³⁶ *Id.*

³⁷ Kenneth L. Karst, *Equal Citizenship Under the Fourteenth Amendment*, 91 HARV. L. REV. 1 (1977).

³⁸ See, e.g., *id.*; Kenneth L. Karst, *Citizenship, Race and Marginality*, 30 WM. & MARY L. REV. 1 (1988); Kenneth L. Karst, *Equal Citizenship at Ground Level: The Consequences of Nonstate Action*, 54 DUKE L.J. 1591 (2005).

There can be little doubt that a new civil rights framework is required. In *The Architecture of Inclusion*, Professor Sturm builds upon Professor Karst's work as she carefully explores the barriers to inclusion and the micro-level commitments that it would take to achieve full inclusion. She has reinvigorated the citizenship concept by helping us understand how institutions can be partners in the quest for full inclusion. The critical point here is that socio-economic institutions are the gatekeepers of inclusion and exclusion. Additionally, positive law is of limited use in the quest for full inclusion. Lastly, as Professor Sturm demonstrates, if we are serious about the task of inclusion, we must carefully and painstakingly examine the architecture of inclusion and build realistic models that will help us achieve our goal. We are in need of a new blueprint for the post-civil rights world, and we are fortunate to have Susan Sturm as one of our key architects.

