

Letters to the Editor

*Wrong Lessons at Girls' Schools*

"NOW Isn't Pro-Choice on Education" by Christine Whelan (editorial page, Aug. 19) editorializes against the National Organization for Women's belief that "coeducation must be mandatory in all publicly funded institutions" and accuses us of being "more concerned with abstractions" than with the lives of actual young women. It was, in fact, the concrete experiences of women and girls with sexism that brought NOW into being and taught us that integration is essential if we are, as our statement of purpose says, "to bring women into full participation in the mainstream of American society now, exercising all the privileges and responsibilities thereof in truly equal partnership with men."

Segregation is not the way to achieve equality. No evidence shows that the presence of single-sex schools works to eliminate unequal treatment of girls in education. A remedy that does not apply to the great majority of girls looks less like a panacea than a divide-and-conquer strategy against women's equality. What is it about sex-segregated schools that might benefit men and win editorial backing?

Schools do more than teach academic subjects. Founding "leadership schools" for girls teaches that girls can only be smart and competitive when boys aren't around. Single-sex education teaches boys that they will be rewarded for bullying girls by not having to compete with them.

Sex segregation also lets school officials evade their responsibility for maintaining positive learning environments to which all students should be entitled. The alternative lauded in Ms. Whelan's commentary is the "right to attend a voluntary all-girls' school" if girls are "fed up with boys throwing spitballs." Cloistering a few girls in separate schools stereotypes abusive behavior by boys as biologically inevitable rather than as anticompetitive behavior that can and must be unlearned. Offering females the choice to leave if they don't like males' harassment is no more acceptable in school than at work: The Manhattan Institute and Ann Rubenstein can run a segregation academy if that is their choice. But they must do so without the validation of public money to mask the traditional advantages gained for boys and men by resistance to truly equal partnership with girls and women.

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As a graduate of a convent high schools and a women's college, I am surprised by Ms. Whelan's lack of historical perspective on single-sex schools. Nineteenth-century feminists founded schools for women and girls because men's schools were closed to them, not because they thought single-sex education was superior to coeducation.

The only "choice" was girls' schools or no education at all. This institutionalized segregation protected men from having to compete as equals with women for educational honors and benefits. At the same time, occupational segregation constrained women's choice of employment to women's work, unpaid or at lower pay than men's. Today's push for girls' schools shows that tactics to remove women from competition with men are simply more subtle now.

Offering girls a choice to get out if they don't like being harassed by boys is not a benefit but an injury disguised as a gift. School is both the workplace of childhood and a model for society. If separate educational arrangements teach that boys and girls cannot learn and thrive together—that they can be enemies or lovers, but not friends—that is an unfortunate lesson learned for a lifetime.

As a product of 13 years of single-sex education, Ms. Whelan shows the effects but no awareness of the 20-year campaign to tout single-sex education mounted by the National Coalition of Girls' Schools and the Women's College Coalition in response to declining enrollment and the threat posed to tax benefits by Supreme Court rulings that racially discriminatory schools violate the 14th Amendment.

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## SINGLE SEX SCHOOLS: PRO AND CON

### **Question: Are single sex schools necessary?**

Coeducation is the prevailing practice in American education<sup>1</sup> and the one most consistent with the ideal of a society in which men and women coexist in equality and mutual respect.<sup>2</sup> At their best, single sex schools have always represented either privilege for men or compensatory privilege for women. In all cases, they undercut the civil rights principle that separate is unequal--while in fact demonstrating that it is true.<sup>3</sup>

Currently, with the exception of debates over denying women admission to military schools, or creating special classes or schools for black boys in low income areas,<sup>4</sup> most efforts to justify single sex education are made on behalf of women's schools. Arguments for these schools stress problems of harassment and discrimination against women in coed schools. Since the only remedy proposed is attendance at women's schools, it is clear that the purpose of the arguments is to preserve women's schools, not to change the conditions which are their ostensible reason for existing.

According to the Women's College Coalition, a lobbying organization of the Association of American Colleges, there are over 90 women's colleges in the U.S., three of which are state-affiliated. There are also numerous sex-segregated private secondary schools and at least two public high schools for girls.<sup>5</sup>

Women's and girls' schools represent a considerable investment of financial and human resources, and a substantial constituency to support the single-sex concept. It is an influential constituency as well, since wealthy men, both conservative and liberal, have traditionally supported separate schools for girls. Justice Lewis Powell, dissenting for himself and Justice William Rehnquist in the Hogan decision, shows a solicitude for women's needs and choices in this area that is nowhere evident when he deals with women's needs and choices regarding

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<sup>1</sup> Deborah L. Rhode, *Justice and Gender*, Harvard (1989), 289.

<sup>2</sup> Sadker (1994), 248: "Advocates [of coeducation] have the support of most of today's students who see coeducation as the way the world is. And even some staunch feminists do not consider single-sex schools the best route to educational equality. It blames the victim, they say, aiding females but leaving boys and the nation's coeducational system unchanged. While recognizing that good single-sex schools benefit girls, they view the approach as defeatist, giving up on the possibility that females and males can learn as equals side by side. And the gains made by the girls, they say, are temporary and are not able to survive the transition to a male-dominated world."

<sup>3</sup> Sarah E. Burns "Apologia for the Status Quo": Review of *Gender Justice*, D. L. Kirp, M. G. Yudof, M. S. Fran. *Georgetown L. J.* 74: 1791 (1986) at 1803: comparison of Philadelphia public single sex schools for boys and girls as detailed in Newberg (1983). See also n.5.

<sup>4</sup> *Garret v. Board of Ed. of the School Dist. of the City of Detroit*, 775 F. Supp.1004 (E.D.Mich., 1991).

<sup>5</sup> Rhode (1989) at 294: "By the mid-1980's, single-sex schools accounted for only 2.3 percent of all college women and a much smaller percentage of men, and the trend in secondary schools was similar." *Id.* n.49 at 410: "Since the Office of Education has not tracked the number of sex-segregated elementary and secondary schools, national statistics are more fragmentary."

The National Coalition of Girls Schools has 68 member schools, some of which are among the 94 primary and secondary schools belonging to the National Association of Independent Schools. The National Catholic Education Association includes 286 girls schools, some diocesan and others run by religious orders. The Natl. Center for Educ. Stats. (Fall, 1992) cites a total of 24.5 million girls in all types of schools K-12, one-percent (210,000) of whom are in private schools. (Communication from Elaine Levitt, NCGS, June, 1994.)

pregnancy--another single-sex situation. The state, he says, should be able to consider women's differing educational needs and to offer women "an additional choice."<sup>6</sup> If it makes any difference that this choice is actually available to only a few women, whatever its merits or their needs, he does not mention it.

Most information on academic excellence of women's schools and the achievements of their alumnae comes from the National Coalition of Girls Schools and the Women's College Coalition, hardly disinterested sources, along with studies showing the beneficial effects of women-dominated environments on the self esteem and self confidence of women students. Since other researchers counter these with studies demonstrating that girls make better progress in coeducational settings, or that sex, compared with other factors, is not significant to educational outcomes, research duels seem bound to end in a draw.<sup>7</sup> Many note the fact that alumnae of single-sex schools historically represent social privilege and at least some academic selectivity, both of which are a boost to success.

Reviewing well-documented and well-publicized claims that girls are subject to harassment and receive less teacher attention and encouragement than boys throughout their years in coeducational schools<sup>8</sup> leads back to the central question -- is separation by sex the best way to overcome sex discrimination that advantages men by cheating women of their right to equal educational opportunity? A better way, that is, than focusing on eliminating sexism in the coed school itself? Logic says no.

The first consideration is equal protection of the law. Why should women and girls have to attend -- if they can -- special schools to get the quality of education and freedom from abuse that men and boys receive as a matter of course?<sup>9</sup> And beyond the dollars required to run a dual system, however unequal in resources, what is the social and legal cost of affirming sex discrimination?

It is, of course, impossible to give all girls a single-sex education without doing the same for boys, or to allow tax exemptions for women's but not men's private schools. (Men who wanted to keep VMI and The Citadel as all-male public schools are happy to point this out.)

Yet many advocates for women oppose single sex schools for boys,<sup>10</sup> while supporting single sex schools for girls as a voluntary choice because, they say, coed schools are male-dominated and single-sex schools offer an "affirmative action" remedy against this problem.<sup>11</sup>

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<sup>6</sup> Mezey (1992), 148.

<sup>7</sup> Sadker, Myra and David, *Failing at Fairness* (1994), 240-41, 249-50; Rhode (1989), *Gender and Justice*, 296-7.

<sup>8</sup> American Association of University Women. *Hostile Hallways: The AAUW Survey on Sexual Harassment in America's Schools*. Washington, DC: American Association of University Women Education Foundation, 1993; *How Schools Shortchange Girls: The AAUW Report*. Washington, DC: American Association of University Women Educational Foundation, 1992.

<sup>9</sup> Burns (1986) at 1804, reviewing a book which regards sex segregation of public schools as "benign": "Is it really in the service of 'equal liberty' to entertain...policy that requires women to mount litigation in order to obtain the self-same benefits that similarly situated men enjoy simply by signing up? And given our nation's experience with racial segregation, can we honestly assume that separate but equal facilities and training are enough and that sex discrimination delivers no other harm?"

<sup>10</sup> Sadker (1994), 225.

<sup>11</sup> "Mary Gray of the Women's Equity Action League is challenging sex-segregated public high schools in Pennsylvania, while favoring tax-exempt status for women's colleges." Ellen Goodman, *Washington Post*, May 31, 1983.

Note, however, how the argument is reversed in favor of coeducational schools when the objective is to open men's schools to women e.g. Rhode (1989 at 295) discussing Vorchheimer, mentions "empirical research

The idea seems to be to let a few girls take refuge in tax-exempt private schools for girls, while the rest are left to duke it out with the boys in sex discriminatory coeducational public and private schools.

A "remedy" that does not apply to the great majority of girls looks less like a remedy than a divide-and-conquer strategy against women's equality. Parting the stream of academically and/or economically advantaged girls forces these girls to choose between affirming their womanhood and seeking the best mainstream education, a choice white boys do not have to make. It also means fewer students and parents with clout to demand equal opportunity for girls in coed schools. There is, moreover, no evidence to show that the presence of single sex schools works to eliminate sex discrimination in coeducational schools. This is not surprising, since an act of separation creates discrimination, not integration.

Single sex schools are also said to give girls a competitive advantage. Over whom? The girls attending coed schools, apparently, since no one suggests that graduates of girls' schools are going to out-compete men. In fact, as an elite educational alternative, single sex schools promote sex discrimination by reducing the number of able young women in direct competition with young men. They do, of course, protect a young man from the threat of being academically outshone by a young woman.

### **Other arguments offered For and Against girls' schools are:**

*"Separate is Better."<sup>12</sup>*

Women's schools were created because men's schools were closed to women, not because single sex education is superior to coeducation.<sup>13</sup>

*Sex-segregated arrangements facilitate educational experimentation.*

Experiments are not necessary to prove that students generally benefit from a positive school environment with a low pupil-teacher ratio.

*Single sex schools are needed to combat sexism in education.*

Single sex schools embody the sexist view that differences between men and women are so significant that they compel separation by sex. As institutions produced by sexism and dependent on sexism to justify their continued existence, single sex schools have a vested interest in keeping sexism alive, not eliminating it.

*"Feminist scholar Elizabeth Tidball's research shows that nearly half of math and engineering doctoral degrees go to women who attended single-sex undergraduate schools."<sup>14</sup>*

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suggesting that coeducational secondary schools promote less stereotypical attitudes toward the opposite sex than gender-segregated institutions and provide better learning environments than do all-male schools."

<sup>12</sup> Susan Estrich, "(For Girls' Schools and Women's Colleges) Separate is Better," New York Times Magazine, May 22, 1994, 39. The New York Times published this one-sided article in praise of sex-segregated schools for girls on the fortieth anniversary of the school racial desegregation decision, Brown v. Board of Education. Estrich sneers at "knee-jerk application of Brown" that lets "lawyers bent on enforcing legal equality" block public schools or classes for girls only. The article is illustrated by a photograph of seventh-grade girls in a computer class in a single-sex private school. Their faces, all set in tough girl frowns, are eleven white, two Asian, zero black.

<sup>13</sup> Sadker (1994), 240 (quoting researcher Valerie Lee): "Even in the best girls' schools we saw sexism....I'm also equivocal because when we saw really outlandish behavior, it was most likely to happen in single-sex schools."

Justices Powell, Burger and Rehnquist cited Tidball's findings in their Hogan dissent in favor of single sex public schools.<sup>15</sup> Her work has been widely criticized for such defects as its inability to "separate the effects of single-sex schools from the higher socioeconomic status and career orientation of their students." Women's lack of access to top men's schools at the time of the study and academic selectivity of private schools are other factors unaccounted for in Tidball's results which were described in a Women's Coalition Report as "outdated and generally insufficient to make a coherent argument."<sup>16</sup>

*Single-sex schools promote educational diversity.*

Classifying and separating by sex is not "diversity" but stereotyping. Negative stereotypes are fostered by class distinctions which prevent people from meeting each other as individuals in everyday contact.<sup>17</sup>

*"Coeducation perpetuates sexual stereotyping and an environment in which boys prevail at the expense of girls."<sup>18</sup>*

Faults attributed to coeducation can be realistically confronted and resolved only in a sex-integrated environment, from earliest childhood on. As students, women and girls are entitled to every support, legal and social, to overcome the current pressures of sexism. Providing temporary havens for an elite few, however, reduces the number of women in direct competition with men and weakens the concerted effort needed to end sexism.

*"Single-sex education promotes values of cultural diversity and personal association."<sup>19</sup>*

"Perpetuating segregated institutions is often a poor substitute for improving integrated ones. In all-female settings, it is more difficult to challenge the cultural attitudes that reinforce subordination; by definition, many of those most in need of such challenge are absent."<sup>20</sup>

*Single sex schools foster feminism.*

"Boys will be boys" is not a feminist tenet. Feminism confronts sexism and acts to eliminate it rather than running away from it or supplying hostages to it as single sex schools do. Feminism sees sex equality as transformative for men as well as women, something that can only occur in an integrated environment.<sup>21</sup>

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<sup>14</sup> Linda Chavez, USA Today, June 1, 1994, 11A. Also cited by Susan Estrich, New York Times Magazine, May 22, 1994, 39.

<sup>15</sup> 458 U.S. 718, at 738-9.

<sup>16</sup> Rhode (1989), 297; 411 n.57 lists critiques of Tidball research.

<sup>17</sup> Burns (1986), 1804: "Excusing...sex segregation with the explanation that the motivation for it is to preserve educational "choice" or "diversity," is to decide that separation of the sexes is more important than affording full access to quality education regardless of sex."

<sup>18</sup> Full page advertisement for Emma Willard School, Harvard Magazine, September 10, 1992, back cover.

<sup>19</sup> Rhode (1989), 296.

<sup>20</sup> Rhode (1989), 299.

<sup>21</sup> Rhode (1986), 133: "Ironically, the initial impetus for women's studies programs came from coeducational campuses, not from self-proclaimed leaders of women's education"; an Association of American Colleges & Universities report on a recent study of Goucher College's transition from women-only to coeducation remarked

*Single sex schools provide a feminist environment.*

"College counselor Naomi Kuziemski said that while 97 percent of Girls High graduates go on to college, very few of them choose all-female institutions. "There is not a lot of militant feminism at Girls High. For example, this year the school started an elective course on "Women in Contemporary Society." The teacher, Irene Farley, said 14 girls signed up, 'five because they were interested in the material and nine because they didn't want to take physics.'"<sup>22</sup>

*Single sex schools promote girls' self-esteem, assertiveness and capacity for leadership.*

Girls are entitled to have their self-esteem, assertiveness and capacity for leadership developed in the mainstream of coeducational life, free from harassment. Removing some girls to separate schools treats some girls as more valuable than others and treats abusive behavior by boys as inevitable, rather than as learned behavior that can and must be unlearned.<sup>23</sup>

*Single-sex schools protect girls from sexual harassment.*

Sexual harassment is simply anti-competitive behavior glamorized as biological inevitability when it is expensively accommodated on separate campuses. Tactics of intimidation and subordination are experienced by girls who attend single sex as well as coed schools, particularly in academic and social interaction with their counterparts at boys schools.<sup>24</sup>

*"University of Michigan researchers found out [that] there is a wide range of quality and equality in single-sex schools, but...the good ones--those that are academically rigorous and work hard at developing self-esteem--should not be allowed to become extinct."*<sup>25</sup>

If the source of girls' low self-esteem is not the innate inferiority of their sex but the way they are treated, why not simply change the way they are treated? As the Supreme Court found in *Brown v. Board of Education*: "To separate [some students] from others of similar age and qualifications solely because of their race generates a feeling of inferiority as to their status in the community that may affect their hearts and minds in a way unlikely ever to be undone....Separate educational facilities are inherently unequal."<sup>26</sup>

*Single sex schools take girls' academic work and career aspirations seriously.*

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with surprise on the speed with which "gender differences" affected Goucher's educational environment in the same way that they affect historically coeducational institutions. The report interpreted this finding as showing a need for single-sex schools and an urgent need to alter coeducational institutions where most women are educated, but it could also be said to repudiate the claim that women's schools build strength to withstand men's dominance. See: *Assoc. of Amer. Coll. and Univ., On Campus With Women*, Winter, 1994, 1.

<sup>22</sup> Philadelphia Inquirer, April 9, 1987, 14-B.

<sup>23</sup> "[W]here is the male accountability? It's as if we all believe that male public social violence can't be controlled." CUNY social psychology professor Michelle Fine commenting on all-girls classes, *Ms.*, May/June, 1994, 58; "the magnitude of any sex difference can be altered by education." Sadker (1994), 229.

<sup>24</sup> Kristen Golden, "What Do Girls See?", *Ms.*, May-June, 1994, 54.

<sup>25</sup> Sadker (1994), 249.

<sup>26</sup> *Brown v. Board of Education*, 347 U.S. 483 at 494.

Not only must girls' academic work and career aspirations be taken seriously by teachers, but boys must see them being taken as seriously as their own. It is easy for boys to stereotype and trivialize girls at a distance, and to maintain these self-serving attitudes for a lifetime.<sup>27</sup>

*"All-girls classes allow girls to be themselves. People moving through the stages of oppression need their own caucus first to figure out who they are, and then they come together with others."*<sup>28</sup>

"Separatist education, like other forms of separatist affiliation, offers the vices and virtues of a ghetto: it provides support, solidarity, and self-esteem for subordinate groups, but often at the price of perpetuating attitudes that perpetuate subordination."<sup>29</sup>

*"The single-sex school, with its dedication to the intellectual and emotional development of girls, has a special power to help girls shed the chrysalis of adolescence and emerge as self-confident young women, secure in their identity."*<sup>30</sup>

"Like racially separate education, separate sex schools stem from prejudicial and stereotypical notions about women and 'whatever their curricula and facilities, [they] are remnants of an earlier era.'"<sup>31</sup>

*"Girls' schools are powerfully effective environments for addressing both aspects of female adolescence--developing an active, assertive, risk-taking attitude toward learning while enhancing traditional female qualities of nurturing and caring."*<sup>32</sup>

"Women's schools subtly encourage the sexist stereotypes they purport to challenge. They encourage women to separate their intelligence from their sexuality."<sup>33</sup>

*Single sex schools provide strong women role models for girls.*

This is an argument for having more women in top academic and administrative jobs in coed schools where boys as well as girls can benefit from seeing women as authorities and successful competitors in integrated environments. Single sex schools may provide more jobs for women, but few if any girls' schools have an all-woman faculty and many have headmasters.

*Single sex schools enhance opportunities for women.*<sup>34</sup>

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<sup>27</sup> "John D. Wilson, president of Washington and Lee University, said faculty members worried about 'the unarticulated lesson we inadvertently teach our young men about women: that they are to be seen as attractive, pleasant companions on social occasions, but incapable of serious intentions or serious work.'" New York Times, August 21, 1984, C1.; "An all-boys class gives boys and girls the unmistakable message that girls are the problem, and excluding girls is the solution," ACLU attorney Deborah Leavy, Philadelphia Inquirer, May 9, 1994, A19.

<sup>28</sup> Marie C. Wilson, Ms. Foundation, quoted in "What Do Girls See?," by Kristen Golden, Ms., May/June, 1994, 58.

<sup>29</sup> Rhode (1989), 298.

<sup>30</sup> Full page advertisement for Emma Willard School, Harvard Magazine, September 10, 1992, back cover.

<sup>31</sup> Mezey (1992), 148.

<sup>32</sup> Full page advertisement for Emma Willard School, Harvard Magazine, September 10, 1992, back cover.

<sup>33</sup> Kaminer (1990), 119.

This claim cannot be separated from the advantages conferred by any type of elite education. By literally teaching women their place, however, single sex schools enforce a "separate spheres" mystique that preserves myths of men's superiority which in fact pay off in enhanced opportunity for men in the workplace.

*In a nationwide survey commissioned by the National Coalition of Girls' Schools, a large proportion of 1200 graduates of all-girl elementary and secondary schools describe themselves as independent, confident, motivated, better at juggling conflicting demands of career and family than their peers who attended coed schools, and convinced that attending a girls-only school encouraged them to be more ambitious.*<sup>35</sup>

Survey questions produce canned (and unverifiable) answers. Positive response from alumnae of girls' schools is to be expected after four or more years of being taught that attendance is a privilege and an advantage over others less fortunate. People like to believe that they or their parents made the right choices, especially when those choices are socially approved.

*Since some girls may do better in a single sex environment, shouldn't that choice be kept available?*<sup>36</sup>

Not at taxpayers' expense, unless "separate is inherently unequal"<sup>37</sup> has ceased to govern public policy. The vaunted excellence of private schools has always served to suppress the demand for high standards in public education. And how does one prove that schooling experienced is "better" than schooling not experienced? And what defines a "some" girl?

*"Gender segregation in education, like gender preference in affirmative action programs, serves the short-term objective of overcoming women's historic disadvantages in educational and vocational pursuits."*<sup>38</sup>

Affirmative action models integration, not segregation. Moreover, affirmative action is intended to be a transitional program for an interim period with clear objectives.<sup>39</sup> To survive, single sex schools instead seek to "institutionalize the status quo."<sup>40</sup> Emma Willard does not advertise itself as "the oldest boarding and day school for girls in America"<sup>41</sup> to signal an intention to go out of business any time soon.

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<sup>34</sup> "Our argument is that women's colleges enhance opportunities for women." Nan Keohane, President of Wellesley College, commenting on Bob Jones decision, quoted by Ellen Goodman. Washington Post, May 31, 1983, A21.

<sup>35</sup> Survey was described in a letter to the editor from the Headmaster of Holton-Arms School, Washington Post, January 31, 1991, p?.

<sup>36</sup> Rhode (1989), 296.

<sup>37</sup> Brown v. Board of Education (1954).

<sup>38</sup> Rhode (1989), 295.

<sup>39</sup> Ruth Bader Ginsburg, "Some Thoughts on Benign Classification in the Context of Sex," Conn. L.R. 10:813, 824 (1978).

<sup>40</sup> Martha Minow, Making All the Difference: Inclusion, Exclusion, and American Law. (1990). Ithaca: Cornell Univ. Press, 382, quotes Aviam Soifer on "constitutionalization of the status quo."

<sup>41</sup> Advertisement for Emma Willard School, Harvard Magazine, Sep-Oct 1992, back cover.

*There is nothing wrong with separation by sex or race if it is chosen voluntarily.*<sup>42</sup>

Is it a voluntary choice if the alternative is sexual harassment, as threatened by promotional materials for single sex schools? Opening most men-only institutions to women while keeping many women-only institutions on a "voluntary" basis protects the idea of fundamental sex differences, and the illusion that some women choose special arrangements to accommodate these "differences." Using single sex schools as an example of "benign" discrimination lets men reserve "the right to declare a difference"<sup>43</sup> when it is to their advantage.<sup>44</sup> Persuading women that equality would cost them sex-based privileges was a ploy used to defeat the ERA and to preserve as constitutional status quo men's right to discriminate on the basis of sex. Single sex schools were frequently cited by ERA opponents as a benefit of sex discrimination to be preserved by denying women's right to equal protection of the law

*"Single sex schools may not always be needed, but they are needed now."*<sup>45</sup>

Women's schools were needed when women were denied admission to men's schools. What is needed now is determination to end sex discrimination in public and private coeducational schools. "For the past two decades, teachers, parents, and students across the country have taken steps to confront gender bias head-on in the coed school. And even those piecemeal, part-time efforts have reaped benefits. While a gender gap in achievement endures...it has been slashed so dramatically that arguments based on biology must be dismissed. And what would happen if the efforts were more than half-hearted? What if people across the nation focused on eradicating sexism in schools? We can only imagine the stunning gains girls would then achieve."<sup>46</sup>

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<sup>42</sup> "Segregation can sometimes be useful; particularly when it is self-segregation, it may promote personal preferences. Locomotive fanciers or fundamentalist Christians segregate themselves for this reason, and that kind of behavior is so commonplace that we don't label it that way. We call it choice." D. Kirp, M. Yudof & M. Franks, *Gender Justice* (1986), 106, quoted in Burns (1986) at 1793,n.17 to show authors' trivializing refusal to acknowledge the power imbalance between men and women.

<sup>43</sup> In House debate on Equal Rights Amendment, Rep. Stewart McKinney's term for his colleagues' reason for opposing the amendment. *Congr. Rec.* Oct. 12, 1971, , H9371.

<sup>44</sup> Rhode (1989,283) cites the following disadvantages to women as resulting from all-male associations: subordination of social status, exclusion from informal interchanges and personal contacts. Rhode (1989), 283. Rhode does not mention that these same effects apply when girls are segregated "voluntarily" by sex.

<sup>45</sup> Sadker (1994), 250, quoting researcher Valerie Lee.

<sup>46</sup> Sadker (1994), 250.