THE HAIR DILEMMA: CONFORM TO MAINSTREAM EXPECTATIONS OR EMPHASIZE RACIAL IDENTITY

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I. INTRODUCTION

Social scientists have long chronicled the impact of an individual's appearance on numerous outcomes including others' judgments of the individual's competence, amicability, intelligence, and trustworthiness.[1] As these types of judgments affect hiring decisions, promotions, performance appraisals, and other critical work outcomes, they can have a particularly profound impact on individuals in the workplace.[2] Accordingly, many people today recognize the importance of projecting a professional image at work and the role that their demeanor, clothing, and grooming play in crafting that image successfully. However, we also know from social science research that women and minorities suffer a disadvantage in crafting this professional image due to negative stereotypes, lower expectations, and workplace norms that run counter to their cultural values and that reward white male standards of behavior and appearance.[3]

Women in general and minority women in particular, encounter many obstacles to achieving their preferred professional image. Gender alone presents a double-bind for women who are making decisions about their grooming and appearance in the workplace. On one hand, the most valued characteristics in corporate settings—competitiveness, ambition, aggressiveness, and competence—are typically associated with men.[4] As a result, women may not want to

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1. Ellen Berscheid & Elaine Walster, *Physical Attractiveness*, *in* ADVANCES IN EXPERIMENTAL SOCIAL PSYCHOLOGY 169–71 (Leonard Berkowitz ed., 1974); *see* Barry Gillen, *Physical Attractiveness: A Determinant of Two Types of Goodness*, 7 PERSONALITY & SOC. PSYCHOL. BULL. 277, 281 (1981) (finding that more attractive targets were rated more highly on socially desirable traits).

2. *See generally* Robert L. Dipboye, Richard D. Arvey & David E. Terpstra, *Sex and Physical Attractiveness of Raters and Applicants as Determinants of Resumé Evaluations*, 62 J. APPLIED PSYCHOL. 288 (June 1977) (finding that attractive job candidates were preferred over unattractive candidates).

3. MATS ALVESSON & YVONNE DUE BILLING, UNDERSTANDING GENDER AND ORGANIZATIONS 6–7, 82–83, 86–87, 106–09 (1997).

4. K.A. Dodge, F.D. Gilroy & L.M. Fenzel, *Requisite Management Characteristics Revisited: Two Decades Later*, 10 J. SOC. BEHAV. & PERSONALITY 253–64 (1995); S.T. Fiske & L.E. Stevens, *What's So Special About Sex? Gender Stereotyping and Discrimination*, *in* GENDER ISSUES IN CONTEMPORARY SOCIETY: APPLIED SOCIAL PSYCHOLOGY ANNUAL 173–96 (S. Oskamp & M. Costanzo eds., 1993); L.B.

groom themselves in a manner that would highlight their femininity or attractiveness.[5] On the other hand, conventionally attractive women fare better professionally than less attractive women, as attractive women tend to make more money and receive more job offers and promotions.[6]

For minority women, the decision of how to groom themselves at work has an added dimension. In addition to managing the paradox of femininity and attractiveness, minority women must also negotiate the presentation of their racial identities. Minority women often feel they must compensate for both their gender and race in attempting to present a professional image that will render them credible to their co-workers.[7] Crafting a professional image entails managing perceptions through a variety of behaviors and grooming decisions. One of the most central decisions in managing perceptions involves how to style one's hair.[8] For example, Professor Rose Weitz chronicled interviews with an Asian woman who permed (curled) her hair often because she felt that she looked "too Asian" with her naturally straight hair.[9] Similarly, a Chicana woman interviewed by Weitz commented that long hair rendered a less professional appearance that highlighted her racial features.[10] In each of these examples, these minority women chose to wear their hair in a manner that downplayed their racial or ethnic identities.

Recent lawsuits document the complexities associated with grooming decisions for Black women in professional settings. In particular, several cases involving Black women show that hairstyle choices may have serious repercussions. In *McManus v. MCI Communications Corp.*, McManus, a Black woman, argued that she was fired for wearing her hair in braids and dreadlocks and dressing in African clothing.[11] The plaintiff in *Hollins v. Atlantis Co.*, who came to work with her hair in "finger waves" (an elaborate cropped hairstyle

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Leuptow & M.B. Leuptow, *The persistence of gender stereotypes in the face of changing sex roles: Evidence contrary to the Sociocultural model*, 16 ETHOLOGY & SOCIOBIOLOGY 509–30 (1995).

5. Madeline E. Heilman & Melanie H. Stopeck, *Attractiveness and Corporate Success: Different Causal Attributions for Males and Females*, 70 J. APPLIED PSYCHOL. 379, 380 (May 1985) ("The more an individual is viewed as having masculine attributes, the better the perceived fit between the individual's characteristics and the job requirements and the more favorable is the prognosis for on-the-job success.").

6. Daniel S. Hamermesh & Jeff E. Biddle, *Beauty and the Labor Market*, 84 AM. ECON. REV. 1174, 1183 (Dec. 1994) (finding that women workers with below-average looks receive a pay penalty, as compared to women workers with above-average looks); Rose Weitz, *Women and Their Hair: Seeking Power through Resistance and Accommodation*, 15 GENDER & SOC'Y 667, 673 (Oct. 2001).

7. Weitz, *supra* note 6, at 681 (concluding that, for women in the study, "any aspect of their appearance that called attention to their minority status reduced their perceived competence and their social acceptability in the workplace").

8. Patricia Faison Hewlin, *And the Award for Best Actor Goes To . . . : Facades of Conformity in Organizational Settings*, 28 ACAD. MGMT. REV. 633, 638 n.4 (2003) (examining conflicts between personal and organizational values when employees create false representations to appear as if they embrace organizational values; stating that the creation of false representations is likely to be a function of whether a person is a minority within a organization); Laura Morgan Roberts, *Changing Faces: Professional Image Construction in Diverse Organizational Settings*, 30 ACAD. MGMT. REV. 685, 693–99 (2005); Sara Mason, *Care for Black Hair*, 171 GLOBAL COSMETIC INDUS. 42, 43, 45 (Jan. 2003).

9. Roberts, *supra* note 8, at 676.

10. *See id.* at 678.

11. 748 A.2d 949, 952 (D.C. 2000).

worn by Black women), claimed that her employer's policy prohibiting "eye catching" hairstyles was discriminatory.[12] Likewise, in *Rogers v. American Airlines, Inc.*, a Black woman was fired for wearing her hair in braids.[13] As these cases demonstrate, "ethnic" hair styles are sometimes not welcome in the corporate world.

However, not all Black women face such explicit discrimination against their hairstyle choices. Most employers are savvy enough to avoid overtly discriminatory policies that would invite legal challenges. Instead, many obstacles arise when employers manifest subtle negative biases that are frequently associated with stereotypes about Black women. For example, it is generally understood that the right balance of femininity and attractiveness can benefit a woman in the workplace, but traditional American culture views Black women as less feminine and less attractive,[14] as well as less intelligent, competent, and dependable in their professional positions than their White counterparts.[15] Awareness of these negative perceptions causes Black women to be especially concerned about whether their hairstyles promote a professional image.[16]

In this Essay we focus on the dilemma that Black women face with regard to their hairstyle choices in the workplace. Our decision to focus primarily on Black women does not assert that one minority group is more important than another group. It does, however, acknowledge that each minority group likely faces its own obstacles and hurdles that are specific to its race, culture, and experiences. We chose to focus on Black women because of the negative stereotypes that are unique to Blacks given the historical context of segregation and inferiority in the United States; because of the preponderance of social science research that contrasts Blacks—more so than any other racial minority—to Whites in the context of prejudice, racism, and social inequality; and because of the unique texture and appearance of Black hair which in its natural kinky state is the opposite of straight hair, the Western standard of beauty.[17] In addition, we focus exclusively on Black women as opposed to Black men because the grooming expectations in many professional environments are the exact opposite for Black men when compared to Black women. The expectation of hair straightening falls solely on Black women and not on Black men. In fact, Black men are expected to wear their hair in its natural state—though the expectation is for keeping it short and conservatively groomed.[18] Accordingly,

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12. 188 F.3d 652, 655–57 (6th Cir. 1999).

13. 527 F. Supp. 229 (S.D.N.Y 1981).

14. Weitz, *supra* note 6, at 678.

15. J. Greenaus & S. Parasuraman, *Job Performance Attributions and Career Advancement Prospects: An Examination of Gender and Race Effects*, 55 ORG. BEHAV. & HUM. DECISION MAKING PROCESSES 273–97 (1993); K.L. Yarkin, J.P. Town & B.S. Wallston, *Blacks and Women Must Try Harder: Stimulus Persons' Race and Sex Attributions to Causality*, 8 PERSONALITY & SOC. PSYCHOL. BULL. 21–24 (1982).

16. *See* Weitz, *supra* note 6, at 678.

17. Tracey Owens Patton, *Hey Girl, Am I More than My Hair?: African American Women and Their Struggles with Beauty, Body Image, and Hair*, 18 NAT'L WOMEN'S STUD. ASS'N J. 24, 26 (Sum. 2006).

18. Susannah Walker, *Black is Profitable: The Commodification of the Afro, 1960–1975*, 1 ENTERPRISE & SOC. 536, 536–64 (2000).

the hairstyle dilemma for Black women is both uniquely racialized and gendered.

We first begin this Essay by describing the unique aspects of grooming and caring for Black textured hair, and explaining how it differs from the hair care of other races and ethnicities. Second, we draw upon social science research on intergroup relations and stereotypes to illuminate the external pressures on Black women to conform to mainstream aesthetic standards. Next, drawing from research on identity, we consider the competing psychological processes and community pressures spurring Black women to eschew traditional norms regarding hair grooming in the workplace. Finally, we discuss the implications of pressures to conform to mainstream norms for both Black women and their employers.

II. THE HAIRSTYLE DILEMMA

A. The Uniqueness of Black Hair

For most professional women, the choice of a hairstyle is restricted to length, color, cut, and style. With the exception of women in the military or other professions with regimented dress codes, grooming choices for White women are primarily based on personal preferences. Also, with the noted exception of choosing to "go blonde," the choice of hairstyle for White women is typically free from stereotypes or biases associated with incompetence or other negative characteristics. Indeed, a recent study concluded that presenting an image that was both conventionally attractive as well as professional was easier to attain for White women than for Black women.[19] Interestingly, the study noted that although some White participants viewed their hairstyle choices as professionally unimportant, none of the minority participants saw these hairstyle choices as simple and inconsequential.[20]

For Black women who work in professional settings where they are frequently the racial minority, deciding on a hairstyle—a presumably simple and personal decision—is both a constrained choice and a formidable dilemma.[21] Black women frequently must choose between hairstyles that conform to the norms and expectations of their White colleagues or hairstyles that are central to their African-American, African, Caribbean, or other racial or ethnic identities. This choice is complicated because in our society, long straight hair has generally been considered the gold standard for attractiveness,[22] and the expectation of a straight conservative hairstyle is clearly present in corporate organizations.[23] However, there exist fundamental physical differences between

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19. *See* Weitz, *supra* note 6, at 684.

20. *See id.* at 682.

21. Yoji Cole, *To Perm or Not to Perm*, DIVERSITY INC., Mar. 31, 2006, *available at* http://www.diversityinc.com/members/login.cfm?hpage=276.cfm (last visited Dec. 15, 2006).

22. Patton, *supra* note 17, at 26.

23. For example, in June of 2002, the Chatham County Court in Savannah Georgia implemented a grooming policy which some considered discriminatory against African Americans. The policy specifically stated that "dreadlocks are not allowed" and "twists are not allowed." Dreadlocks and twists are both styles for black hair textures. Paula Reed Ward, *Twist Hairstyle Tangles with Grooming Policy*, SAVANNAH MORNING NEWS, July 26, 2002, http://old.savannahnow.com/stories/072602/

the hair textures of Black women and non-Black women. The natural hair texture of most Black women is kinky, wooly, or tightly curled.[24] Accordingly, a great deal of time and expense is required to transform Black hair so that it conforms to traditional workplace norms for appearance—in other words, so that it looks more similar to the hair of their White, Asian, or Hispanic counterparts. Black women can achieve straight-looking hair by using chemicals or thermal tools,[25] or by using hair extensions and weaves. However, these style options are not without their costs. For many Black women, straightening their hair can result in hair breakage or skin diseases.[26]

Instead of straightening their hair, Black women can opt for hairstyles that complement their natural hair textures.[27] Afros, braids, twists, and dreadlocks are the primary style choices that release Black women from the financial and physical burdens of hair straightening. However, unfortunately for many Black women, these styles are not universally embraced by the larger society and are typically seen as less attractive or flattering than straight hair.[28]

B. Conforming to Mainstream Expectations

For minority women in general, and Black women in particular, hairstyle choices are subject to pressures to conform to mainstream norms of attractiveness and professionalism. Chemically-relaxed hair is currently the most popular style choice for Black women. In a recent study, eighty percent of the Black women surveyed responded that they believed relaxed hair is more easily maintained than natural hair.[29] Indeed, Black women spend approximately $50 million per year on chemical straighteners alone.[30] Although a direct causal relationship can not be explicitly established, it is likely that the popularity of chemically relaxed hair persists among Black women because of perceptions of the ease of hair maintenance, prevailing norms of beauty, and the popular belief that long straight hair is more attractive than tightly-curled hair.[31]

The pressure on Black women to conform to traditional norms of dress and appearance is powerful. Although several successful Black women have chosen to wear their hair in its natural state—including scientist Mae Jemison, actress Whoopi Goldberg, and journalist Michele McQueen Martin—most Black women

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LOChair.shtml. Additionally, Hampton University, a historically black institution, prohibits ethnic hairstyles including braids and dreadlocks for students enrolled in it's MBA program. Philip Walzer, *Hampton U Says Which Hairstyles Make the Cut*, THE VIRGINIAN-PILOT, Jan. 21, 2006, at A1, A10.

24. *See* Victoria L. Holloway, *Ethnic Cosmetic Products*, 21 DERMATOLOGIC CLINICS 743, 743–45 (2003); Amy J. McMichael, *Ethnic Hair Update: Past and Present*, 48 J. AM. ACAD. DERMATOLOGY S127, S128–29 (June 2003).

25. Mason, *supra* note 8, at 43, 45.

26. Lisa B. Samalonis, *Ethnic Hair Presents Unique Challenges: Recognizing Causes of Disorders Helps Guide Treatment Decisions*, 26 DERMATOLOGY TIMES 40, 40 (Oct. 2005).

27. Mason, *supra* note 8, at 48.

28. *See* Patton, *supra* note 17, at 26.

29. Mason, *supra* note 8, at 48.

30. Mason, *supra* note 8, at 43 (finding that Black women spent $47 million on chemical straighteners in 2002).

31. Norbert Mesko & Tamas Bereczkei, *Hairstyle as an Adaptive Means of Displaying Phenotypic Quality*, 15 HUM. NATURE 251, 260 (Summer 2004).

who have achieved prominence and success in mainstream society have chosen to conform to the dominant standards of beauty and professionalism by straightening their hair. For example, television producer and talk show host Oprah Winfrey, Secretary of State Condoleezza Rice, and Sheila Johnson (owner of the Washington Mystics) are all Black women who straighten their hair.

Although there are probably many reasons why Black women choose to conform to dominant aesthetic standards in the workplace, we argue that Black women conform primarily because they seek to minimize the perception that they are different from their colleagues and because they want to avoid the pitfalls of stereotyping. Moreover, by conforming, they can preserve their professional images, avoid negative career consequences, and fit in with their colleagues. A Black woman's choice of hairstyle plays a part in obtaining such conformity.

1. *Minimizing Perceived Differences*

Social-psychological research provides robust evidence that being perceived as different can be a liability in the workplace.[32] The similarity-attraction paradigm establishes that coworkers prefer to interact with others who are demographically similar to themselves.[33] There is increased turnover among employees who are demographic misfits in their work organizations.[34] Also, network theorists discovered that both men and women are likely to form same-sex ties for social support in organizational settings.[35] In addition, same-race mentoring relationships are shown to provide more social and psychological support than are cross-race mentoring relationships.[36]

Unfortunately, in most corporate organizations Black women differ from the dominant group across two dimensions: race and gender. Although race and gender are immutable, perceptions of dissimilarity can be heightened or diminished through deliberate self-presentation choices, including grooming and hairstyle choices.[37] Many Black women are aware that the more different they appear to be, the more uncomfortable their White colleagues will be with them, and the more difficult it will be for Black women to attain full acceptance at work. Therefore, Black women are frequently motivated to make themselves appear similar to Whites.

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32. *See generally* DONN BYRNE, THE ATTRACTION PARADIGM (1971); Samuel B. Bacharach & Peter A. Bamberger, *Diversity and Homophily at Work: Supportive Relations among White and African-American Peers*, 48 ACAD. MGMT. J. 619, 639 (Aug. 2005) (suggesting that "both social minorities and majorities are likely to 'turn to their own' for support when employed in a work unit increasingly dominated by those ethnically dissimilar to themselves"); Herminia Ibarra, *Homophily and Different Returns: Sex Differences in Network Structure and Access in an Advertising Firm*, 37 ADMIN. SCI. Q. 422, 422 (Sept. 1992) (finding that men are more likely to form stronger homophilous ties across multiple networks).

33. Joan M. Glaman, Allan P. Jones & Richard M. Rozelle, *The Effects of Co-Worker Similarity on the Emergence of Affect in Work Teams*, 21 GROUP & ORG. MGMT. 192, 209 (June 1996).

34. Joshua M. Sacco & Neal Schmitt, *A Dynamic Multilevel Model of Demographic Diversity and Misfit Effects*, 90 J. APPLIED PSYCHOL. 218 (2005).

35. Ibarra, *supra* note 32, at 442.

36. David A. Thomas, *The Impact of Race on Managers' Experiences of Developmental Relationships (Mentoring and Sponsorship): An Intra-Organizational Study*, 11 J. ORG. BEHAV. 479, 487 (Nov. 1990).

37. Kenji Yoshino, *Covering*, 111 YALE L.J. 769, 889 (2002).

Journalist Charisse Jones and clinical psychologist Kumea Shorter-Gooden interviewed Black women, finding that most were uniquely concerned with being perceived as too different or "too Black" in the work place.[38] One of the interviewees explained that she always pinned up her dreadlocks when on duty at her law-enforcement job, stating: "I'm sure that if I hadn't done that, they would have found any way they could to fire me. I think it would have been too Black for them, so people never see my hair down."[39] Although she might have pinned up her hair for a number of reasons, she did it because she feared negative employment consequences for highlighting her Blackness.[40]

Not only are Black women demographically dissimilar to their colleagues, but these gender and racial dissimilarities are also frequently associated with low-status positions in the social hierarchy.[41] Because these negative stereotypes can be professionally damaging,[42] Black women desire to minimize these perceived differences, thereby avoiding negative stereotyping.

2. *Avoiding Negative Stereotypes*

A classic study on racial stereotypes in the early 1930s found that Whites were viewed as smart, industrious, and ambitious, whereas Blacks were viewed as ignorant, lazy, and happy-go-lucky.[43] Subsequent studies conducted in the '60s, '70s, and '80s indicated that the blatantly negative perceptions of Blacks had largely faded.[44] However, this blatant racism was replaced by more subtle forms of negative biases—referred to as aversive racism,[45] symbolic racism,[46] and modern racism.[47] Although these theories of contemporary racism differ in some respects, a common thread runs among them: Non-Blacks exhibit subtle racism when it is safe and socially acceptable to do so, or when the racism is easily

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38. CHARISSE JONES & KUMEA SHORTER-GOODEN, SHIFTING: THE DOUBLE LIVES OF BLACK WOMEN IN AMERICA 190 (HarperCollins 2003).

39. *Id.*

40. *Id.*

41. Rodolfo Mendoza Denton et al., *Sensitivity to Status-Based Rejection: Implications for African American Students' College Experience*, 83 J. PERSONALITY & SOC. PSYCHOL. 898 (2002); Jennifer Crocker, Brenda Major & Claude Steele, *Social Stigma*, *in* 2 THE HANDBOOK OF SOCIAL PSYCHOLOGY 505 (Daniel T. Gilbert, Susan T. Fiske & Gardner Lindzey eds., 1998).

42. John F. Dovidio & Samuel L. Gaertner, *Aversive Racism and Selection Decisions: 1989 and 1999*, 11 PSYCHOL. SCI. 315–19 (2000); Ashleigh Shelby Rosette et al., *The White Standard in Leadership Evaluations: Attributional Benefits of a White Corporate Ladder*, *presented at* ANN. MEETING ACAD. MGMT. (2006) (manuscript on file with author); Claude M. Steele & Joshua Aronson, *Stereotype Threat and the Intellectual Test Performance of African Americans*, 69 J. PERSONALITY & SOC. PSYCHOL. 797 (1995).

43. Daniel Katz & Kenneth Braly, *Racial Stereotypes of One Hundred College Students*, 28 J. ABNORMAL PSYCHOL. 280, 286 (Oct. 1933).

44. John F. Dovidio & Samuel L. Gaertner, *Prejudice, Discrimination, and Racism: Historical Trends and Contemporary Approaches*, *in* PREJUDICE, DISCRIMINATION AND RACISM 1, 6, 7 (John F. Dovidio & Samuel L. Gaertner eds., Academic Press, Inc. 1986).

45. John F. Dovidio et al., *Stereotyping, Prejudice, and Discrimination: Another Look*, *in* STEREOTYPES AND STEREOTYPING 276, 288 (C. Neal Macrae, Charles Stangor & Miles Hewstone eds., Guilford Press 1996).

46. David O. Sears, *Symbolic Racism*, *in* ELIMINATING RACISM 53, 54 (Phyllis A. Katz & Dalmas A. Taylor eds., Plenum Press 1988).

47. John B. McConahay, *Modern Racism, Ambivalence, and the Modern Racism Scale*, *in* PREJUDICE, DISCRIMINATION AND RACISM, *supra* note 44, at 91, 92-93.

rationalized.[48] In addition, they all agree that merely by growing up in the United States, Whites learn of the negative stereotypes associated with Blacks from their parents, peers, culture, and society. As a result of this upbringing, Whites frequently attach feelings of negative affect to Blacks.[49]

Implicit Association Tests (IATs) provide compelling evidence that many Whites hold negative stereotypes that are frequently associated with Blacks.[50] In the IAT, participants sort Black and White faces and positive and negative words into their respective columns. One portion of the test mixes these stimuli, with the instruction to group White faces and positive words into one column, and to group Black faces and negative words into another. Participants typically performed this task quickly and easily.

A subsequent part of the test switched these values, instructing participants to group White faces with negative words and Black faces with positive words. Participants experienced a significant difference in response time and made more errors in grouping when asked to associate Black faces with positive words.[51]

IATs have demonstrated a strong positive evaluation of Whites and a relatively negative evaluation of Blacks. Although researchers have not yet administered the IAT so that it encompasses biases specific to the workplace, given the preponderance of empirical organizational evidence that already exists exhibiting a bias in favor of Whites,[52] it is likely that the IAT findings are applicable to the workplace as well.

The theory of "stereotype threat" has been developed to describe the desire to avoid confirming negative stereotypes.[53] The theory focuses on the fact that minorities are aware of the negative stereotypes held against them and, as a result, alter their behavior to avoid confirming them.[54] For example, when Black college students were concerned about confirming negative stereotypes, they

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48. John F. Dovidio & John F. Gaertner, *Changes in the Expression and Assessment of Racial Prejudice*, *in* PERSPECTIVES ON RACE RELATIONS IN CONTEMPORARY AMERICA 119–48 (Harry J. Knopke et al. eds., 1991).

49. Samuel L. Gaertner & John F. Dovidio, *The Aversive Form of Racism*, *in* PREJUDICE, DISCRIMINATION, AND RACISM, *supra* note 44, at 61–89.

50. *See* National Science Foundation, Unmasking Bias (Jan. 27, 2005), http://www.nsf.gov/discoveries/disc_summ.jsp?cntn_id=100297 (last visited Jan. 8, 2007).

51. *Id. See also* Nilanjana Dasgupta et al., *Automatic Preference for White Americans: Eliminating the Familiarity Explanation*, 36 J. EXPERIMENTAL SOC. PSYCHOL. 316, 321 (2000); Anthony G. Greenwald, *Measuring Individual Differences in Implicit Cognition: The Implicit Association Test*, 74 J. PERSONALITY & SOC. PSYCHOL. 1464, 1474 (June 1998).

52. Marc Bendick, Jr., Charles W. Jackson & Victor A. Reinoso, *Measuring Employment Discrimination Through Controlled Experiments*, 23 REV. BLACK POL. ECON. 40–42 (Sum. 1994); Kurt Kraiger & J. Kevin Ford, *A Meta-Analysis of Ratee Race Effects in Performance Ratings*, 70 J. APPLIED PSYCHOL. 56, 60 (Feb. 1985); David J. Maume, Jr., *Glass Ceilings and Glass Escalators: Occupational Segregation and Race and Sex Differences in Managerial Promotions*, 26 WORK & OCCUPATIONS 483, 504 (Nov. 1999).

53. Claude M. Steele & Joshua Aronson, *Stereotype Threat and the Intellectual Test Performance of African Americans*, 69 J. PERSONALITY & SOC. PSYCHOL. 797 (Nov. 1995).

54. *Id.*

were less likely to report liking rap music and basketball, two forms of entertainment that are frequently associated with Blacks.[55]

Similarly, Black women are very concerned about the image they present to their colleagues in the workplace. They are highly aware that their hairstyles may highlight the fact that they are different and thereby invite negative stereotypes about Black women. Jones and Shorter-Gooden highlight this concern in one of their interviews.[56] A Black sales representative commented that she always straightens her hair for job interviews or any new job situation to avoid negative stereotypes:

> "I used to wear braids all the time, but when I graduated from school, it was a conscious decision to take them out," says Marti, a sales representative for a pharmaceutical company in Chicago. After she's been on a job for a while, become familiar to her peers, and proved her competence and ability to fit in, Marti occasionally switches back to a braided hairstyle. But she never goes into an interview or a new job experience without first straightening her hair. . . . "I don't want to be prejudged. And I think a lot of times it's real easy for them to do that because they don't understand how our hair works, and that it's just a hairstyle. I think it's just different to them. And I don't know what their experience has been with Black women with braids. I don't know what they think but I don't want that to be the reason that I don't get the job."[57]

Marti's primary motivation for not wearing braids was to avoid stereotyping that may lead to negative career consequences. The choice to not emphasize one's attributes in order to avoid the negative consequences that can result is known as covering and shifting.

3. *Covering and Shifting*

An increasing body of literature has documented how women and minorities devote a great deal of effort to fitting in to mainstream society, especially in the workplace. Erving Goffman introduced the term "covering," which describes an individual's choice to render their stigmatized characteristics less salient to preserve their status in a social order.[58] Legal scholar Kenji Yoshino drew on Goffman's work in his description of the demands placed on employees to downplay low-status or stigmatized aspects of their identities. As described by Yoshino, societal pressures on racial minorities to cover do not require that they deny their racial backgrounds, rather they simply demand that minorities "perform" race in a manner that makes it easy for others to ignore race.[59]

Similarly, another study documented pervasive "shifting," which is defined as altering one's behavior to avoid offending others; unlike the above-described research on covering, this particular study of shifting focused on Blacks.[60] Shifting occurs in many ways, including when Black women change

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55. *Id.* at 804.
56. JONES & SHORTER-GOODEN, *supra* note 38, at 189.
57. *Id.* at 189–90.
58. ERVING GOFFMAN, STIGMA: NOTES ON THE MANAGEMENT OF SPOILED IDENTITY 102–04 (1963).
59. *Id.* at 780.
60. JONES & SHORTER-GOODEN, *supra* note 38, at 6–7, 9.

their styles of speaking or dialect depending upon the context, attempt to hide their physical characteristics (e.g. an "ample derriere"), or leave the beauty parlor with straightened hair.[61] The study concluded the following about Black women's hair dilemma:

> These women have had to learn to shift to manage society's limited tolerance of Black hair. They've had to shift to ensure that they aren't immediately dismissed based on their hairdos, and that they're given a chance to demonstrate their competence and skills. They've had to shift so that their hair doesn't blind their employers to their talents.[62]

Both of these concepts—covering and shifting—describe the variety of ways that people manage their images to avoid discrediting themselves professionally. When Black women choose to conform to normative expectations in the workplace by straightening their hair, this decision falls in the realms of covering and shifting.

C. Self-Hatred Theory

When Black women choose hairstyles that conform to workplace norms, their decision is based partly on how others view them and partly on how they view themselves. Having internalized the aesthetic standards of mainstream society, many Black Americans believe that straighter hair and other physical features approximating Whiteness are preferable.[63] Supporters of the self-hatred theory[64] associate Black hair straightening with hatred of Black physical traits and admiration of White physical traits. Features such as blond hair, fair skin, and blue eyes constitute ideal beauty in American society; however, these features are the opposite of those characteristic of most Black women.[65] This self-hatred theory was most vividly noted during the 1960s at the height of the Black Power movement, when the afro became a symbol of pride and liberation, whereas thermally- or chemically-altered hair represented shame and embarrassment of one's Black racial origin.[66]

To assess the relevance of this provocative proposition, Professor Ingrid Banks asked numerous Black women if they considered hair straightening to be a form of self-hatred.[67] While Black women with natural hairstyles were more likely to agree with the propositions set forth in the 1960s, women who straightened their hair tended to disagree with the self-hatred arguments.[68] Nia, who wears her hair in a naturally short hairdo, noted the following:

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61. *Id.* at 7.

62. *Id.* at 190.

63. Mark E. Hill, *Skin Color and the Perception of Attractiveness among African Americans: Does Gender Make a Difference?*, 65 SOC. PSYCHOL. Q. 77, 80 (Mar. 2002).

64. WILLIAM H. GRIER & PRICE M. COBBS, BLACK RAGE 42–44, 52, 54 (1968).

65. INGRID BANKS, HAIR MATTERS: BEAUTY, POWER, AND BLACK WOMEN'S CONSCIOUSNESS 44–48 (2000); KATHY RUSSELL ET AL., THE COLOR COMPLEX: THE POLITICS OF SKIN COLOR AMONG AFRICAN AMERICANS 82 (1992).

66. BANKS, *supra* note 65, at 44–48.

67. *Id.* at 62.

68. *Id.*

> "I tend to agree with that theory. I think that a lot of women, most women, will probably deny that. . . . I think that we've been, our oppression has been so well done. It's been so complete that we don't even know when we're acting against ourselves. And we don't even see that our own values in terms of beauty are very skewed."[69]

Andaiye used her own experiences to examine the notion of self-hatred:

> "I think it can be a manifestation of [self-hatred]. I wanted the whole, you know, the long hair, the get in the water and bring your hair up and it's slicked back. But of all those things I was mimicking, they weren't of any sistas, you know what I'm saying. They were white women. So when I look at it like that, I guess it was self-esteem problems, a certain level of self-hatred. Because maybe if I had saw a sista with an Afro on that commercial and all the water sucked the hair, I'd have been wantin' that."[70]

Nia and Andaiye agreed with the self-hatred theory but for different reasons.[71] Nia suggested that self-hatred originated with the oppression experienced by Blacks during slavery and through the 1960s.[72] She implied that this oppression is so intensely ingrained in the psyche of Black women that it exists only at the subconscious level and is not explicitly recognized by Black women.[73] Rather than focusing on past oppression, Andaiye focuses on the subliminal effects of the American standard of beauty, which is based on the physical features of Whites.[74]

Many women in Banks' study disagree with the self-hatred theory and maintain that hair alteration has nothing to do with negative images of oneself.[75] For example, Taylor says the following:

> "I wouldn't think of it in terms of self-hatred: I would think of it in terms of you have to do what you have to do to get over and the white man does what he has to do to get over, and why should we not do the same thing? We're all out there economically trying to compete for the dollars, so by whatever means necessary that's what it's all about. So you have to go with the flow. . . . There's so many things that they nit-pick at black women or men until [you take the position]: 'Look, clone yourself like them. Go in there, come home [and] do whatever you have to do to enjoy yourself at home.' That's what you have to do but you still have to earn a living."[76]

Diane, who wears her hair chemically straightened also emphatically disagrees with the self-hatred theory:

> "Well, I think it's awful [to think that if black women straighten their hair then they hate themselves or they are trying to look white]. I think you can do anything within your capability, financially, or whatever, to improve the way

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69. *Id.* at 45.
70. *Id.* at 47 (alteration in original).
71. *Id.* at 44–47.
72. *Id.* at 45.
73. *Id.*
74. *Id.*
75. *Id.* at 60–68.
76. *Id.* at 62–63 (alterations in original).

> you look. I don't see anything wrong with it. I don't think when I straighten my hair or perm my hair I'm trying to be white. I'm just trying to look better for me, and not for my husband, my friend, or nobody else. For me."[77]

Both Taylor and Diane adamantly denied that straightening Black hair is a form of self-hatred, but agreed that hair straightening occurs because of White privilege.[78] Taylor did this directly while Diane made this assumption indirectly.[79]

White privilege is best described as myriad advantages that White people enjoy on a daily basis that racial minorities do not.[80] White privilege has been described by Peggy McIntosh as "an invisible package of unearned assets" upon which Whites can draw every day.[81] It takes a variety of forms, perhaps the most common of which are cultural assumptions. Cultural assumptions are the attitudes that people possess that are associated with stereotypes.[82] Taylor presumed that the stereotypes associated with being White are positive and bring with them economic advantages such as promotion and advancement in the workplace.[83] Accordingly, she suggested that at work Blacks should just conform as much as possible, which includes straightening one's hair.[84]

Unlike Taylor, Diane made her White privilege references indirectly.[85] Specifically, she straightened her hair to look better.[86] However, her choice of the term "better" implies a comparison between naturally kinky hair—a typical characteristic of many Black women—and straight hair—a typical characteristic of many White women.[87] This comparison implicitly assumes that the natural state of many Whites' hair is indeed "better" than the natural state of Blacks' hair.[88]

Some Black women perceive that straightening hair is a form of self-hatred while others believe that the behavior is similar to that of women in other cultures who bind their feet, stretch their earlobes, or paint their hands with intricate markings.[89] Whether or not hair straightening constitutes a form of self-hatred, it is clear that Black women's attitudes toward hairstyle-selection are deeply-rooted and complex.[90]

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77. *Id.* at 67 (alteration in original).

78. *Id.* at 62–67.

79. *Id.* at 62–63, 67.

80. Ashleigh Shelby Rosette & Leigh Plunkett Tost, *Intersecting Unrecognized Advantage with Experienced Disadvantage: The Revelation of White Privilege in Organizations*, at 3 (2006) (unpublished manuscript, on file with author).

81. Peggy McIntosh, *White Privilege and Male Privilege: A Personal Account of Coming to See Correspondences Through Work in Women's Studies*, *in* RACE, CLASS, AND GENDER: AN ANTHOLOGY 76 (Margaret L. Andersen & Patricia H. Collins eds., 2d ed. 1995).

82. Rosette & Tost, *supra* note 80, at 3.

83. BANKS, *supra* note 65, at 62–63.

84. *Id.*

85. *Id.* at 67.

86. *Id.*

87. *Id.*

88. *Id.*

89. RUSSELL ET AL., *supra* note 65, at 82.

90. *See id.* at 82, 84; BANKS, *supra* note 65, at 62–63.

III. CHOOSING TO EMPHASIZE RACIAL IDENTITY

While many Black women choose to conform to dominant organizational norms by wearing their hair in the straightened state, many others choose not to conform. For some women this choice is about personal expression. A recent study of executive women documented that many Black women navigate their professional and ethnic identities by creating a "bicultural life structure," whereby they separate their mostly White *professional* worlds from their mostly Black *personal* worlds.[91]

Yet, the study also found that many Black women eschew this "bicultural" experience and refuse to assimilate to majority norms by segmenting off their Black selves.[92] These women are "not interested in being 'incogNegro,' a Black person who attempts to disguise, hide, or deny her racial identity. Their willingness to reveal their sense of identity keeps them strongly connected to Black womanhood."[93] Many Black women choose to attain this sense of identity through their hairstyle choices. *Rogers v American Airlines, Inc.* documented the circumstances of one Black woman who felt that wearing her hair in braids reflected her heritage and was a critical part of expressing her racial identity.[94] For Rogers and other Black women, hairstyle restrictions constrain identity expression.[95] Indeed, for some, the expectation that a Black woman should straighten her hair is a restriction of their most central defining self-aspect—racial and ethnic identity.

In the field of social psychology, social identity and social categorization theories emphasize the concept that group membership and demographic categories are important aspects of self-identity.[96] Other researchers emphasize that identity is a multi-dimensional construct[97] and that any given individual's sense of identity is comprised of their social relationships, roles, and category memberships.[98] Identity theorists have historically argued that these multiple components of the self are differentially weighted, such that some aspects are more important or salient than others.[99] Moreover, the greater the salience of any given aspect of identity, the greater is the individual's need to express that aspect and to have it acknowledged by others.[100]

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91. ELLA L.J. EDMONSON BELL & STELLA M. NKOMO, OUR SEPARATE WAYS 230–33 (2001).
92. *Id.* at 233.
93. *Id.*
94. 527 F. Supp. 229, 231 (S.D.N.Y. 1981).
95. *See id.*
96. HENRI TAJFEL, HUMAN GROUPS AND SOCIAL CATEGORIES (1981).
97. *See* Richard D. Ashmore et al., *An Organizing Framework for Collective Identity: Articulation and Significance of Multidimensionality*, 130 PSYCHOL. BULL. 80, 81, 82, 84, 109 (Jan. 2004) (describing identity as a characteristic that crosses disciplinary fields).
98. *See id.* at 80, 94.
99. *See* Peter L. Callero, *Role-Identity Salience*, 48 SOC. PSYCHOL. Q. 203, 203 (Sept. 1985).
100. *Id.* at 204.

People have a need to express relevant aspects of their identities.[101] When people are unable to express these self-aspects, they experience dissatisfaction and frustration.[102] In a study of students with self-defining goals that represented their central identities—e.g., artistic, athletic, intellectual—researchers found that preventing the study participants from fully expressing these identities led to a state of internal tension.[103] These basic findings are consistent with studies that have drawn an explicit connection between the relative importance of certain aspects of identity and workplace outcomes.[104]

Utilizing workers (i.e., doctors, lawyers, engineers, teachers) and students who participated in volunteer community orchestras and bands, one researcher examined whether the workers' and students' separation of their musical and professional or academic lives led to a sense of conflict between their musical and professional or student roles.[105] Across two studies, the results showed that when the workers' and students' dominant identity was determined by their musical lives and when they restricted their expression of this dominant identity by separating it from other aspects of their lives, they experienced a greater sense of conflict between their multiple role-identities, which ultimately decreased their satisfaction with work and school. In other words, if the workers and students felt that music was a dominant aspect of their identity, yet limited expression of this self-aspect by concealing their music identity at work or school, they experienced a greater sense of conflict between their professional or academic lives and their personal lives. Such conflict between personal and professional identities may be applicable to Black women when their African-American, African, or Caribbean identities are compared and contrasted with their professional roles. That is, for Black women who feel that their racial or ethnic identity is dominant in their self-definitions, the costs of restricting the expression of that salient identity are great. Thus, although some women risk negative career consequences for highlighting their Blackness at work through their choice of ethnic hairstyles, these women would prefer to take this risk rather than experience the psychological tension and internal conflict resulting from identity restriction.

IV. CONCLUSION

To some degree, all employees must conform to their employers' expectations and guidelines when dressing and grooming for work. Work uniforms, dress codes, and organizational norms require everyone to "look the

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101. Jeffrey T. Polzer et al., *Capitalizing on Diversity: Interpersonal Congruence in Small Work Groups*, 47 ADMIN. SCI. Q. 296, 298, 299 n.2 (2002); Callero, *supra* note 99, at 203; Peter M. Gollwitzer et al., *Admission of Failure and Symbolic Self-Completion: Extending Lewinian Theory*, 43 J. PERSONALITY & SOC. PSYCHOL. 358, 360–61 (1982); Sheldon Stryker, *Identity Salience and Role Performance*, 4 J. MARRIAGE & FAMILY 563 (1968).

102. Gollwitzer et al., *supra* note 101, at 365.

103. *Id.* at 364.

104. Blake E. Ashforth et al., *All in a Day's Work: Boundaries and Micro Role Transitions*, 25 ACAD. MGMT. REV. 472–91 (2000).

105. Tracy Dumas, When to Draw the Line: Effects of Identity and Role Boundary Management on Interrole Conflict (2003) (unpublished Ph.D. dissertation, Northwestern University, on file with author), *available at* ABI/INFORM database (last visited Jan. 1, 2007).

part" while at work. However, for minority women in general and Black women in particular, "looking the part" at work carries the additional dimension of managing attributions, expectations, and stereotypes based solely on core aspects of their identities—the immutable characteristics of race and gender.

In isolation, Black women's preferences to straighten their hair may seem simply to be a choice of adornment; however, when coupled with all the other available "self-improvement" choices in which they sometimes engage—such as wearing colored contacts, lightening their skin, reducing the size of their lips, and decreasing the size of their noses—it is clear that the standard of beauty in the U.S. is in direct opposition to the natural features and characteristics of most Black women. It is also important to consider these grooming choices in the context of societal norms. Black women do not have the luxury of mere preferences; their choices are colored by a historical lens that includes negative stereotypes and lowered expectations. Throughout American history, skin color, eye color, and hair texture have had the power to shape the quality of Black people's lives, and that trend continues today for Black women in the workplace.

Though we have focused on the impact of dominant aesthetic norms on Black women in the workplace, we acknowledge that this same dynamic extends to the experiences of other groups and has broader implications for individuals and organizations which warrant further examination. For instance, future research should consider the impact of the cognitive and emotional toll experienced by minorities and women as they continually worry about navigating others' interpretations of their professionalism and competence. How much productive activity is lost by Black women who spend countless hours coaxing their naturally curly hair into a more desirable state? On the part of the organization, what is the cost of all of the misplaced energy, attention, and resources devoted to policing the hair and grooming practices of employees? Further, what is the ultimate cost of the loss of talented employees or recruits who are filtered out of corporate organizations based solely on grooming features largely irrelevant to their ability to perform at work? Kenji Yoshino, in his work describing the pressure on gays, women, and racial minorities to "cover" stigmatized characteristics in the workplace, calls for a reexamination of discrimination laws to encompass this undue burden on minorities and marginalized groups.[106] Similarly, in our analysis of the experiences of Black women in the workplace, we are concerned with developing a comprehensive understanding of how organizations can create environments where all of their employees can thrive and contribute to their fullest without compromising central aspects of their identities.

106. Yoshino, *supra* note 37, at 781, 938–39.