Man Up or Go Home: Exploring Perceptions of Women in Leadership

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MAN UP OR GO HOME: EXPLORING PERCEPTIONS OF WOMEN IN LEADERSHIP

BY: ABIGAIL PERDUE*

If you are aggressive, you are a bitch.
If you are emotional, you are PMSing.
If you are soft, you are too feminine.
Whatever way someone finds you . . . it is because you are female.

–Yunha Kim, What I Learned in My First Year as a Female Startup CEO

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I. INTRODUCTION

Throughout history, women in positions of authority have often been perceived as violating well-established gender norms. Perhaps as a result, female leadership has often been viewed as a threat to male power and privilege and thus provoked resistance.¹ Female leaders challenge longstanding sex stereotypes and patriarchal structures, subverting the identities of androcentric institutions and the people who comprise them. In so doing, they redefine notions of what it means to be a leader as well as what it means to be a woman. Cisgender male subordinates in particular may feel that their masculinity is under assault when they are placed under female supervision. This power struggle can be readily observed at the Virginia Military Institute (VMI), which enrolled women for the first time in 1997 after the United States Supreme Court declared VMI’s all-male admissions policy unconstitutional.² To explore the impact of coeducation at VMI, I collaborated with a sociologist and psychologist to anonymously survey VMI’s student body. This Article relies upon the empirical data we collected to explore perceptions of women in leadership at VMI. Our findings reveal that like many female politicians, CEOs, and other women working in male-dominated spheres, female cadets at VMI are often

¹ As used herein, the terms “maleness,” “male-centeredness,” and “male power” refer to the power and privilege historically held by affluent, white, heterosexual, cisgender men without disabilities who do not possess subordinate identities that significantly reduce their power and privilege. See generally SANDRA LIPSITZ BEM, THE LENSES OF GENDER: TRANSFORMING THE DEBATE ON SEXUAL INEQUALITY 3 (1993); see also Bethany M. Coston & Michael Kimmel, Seeing Privilege Where It Isn’t: Marginalized Masculinities and the Intersectionality of Privilege, 68 J. SOC. ISSUES 97–111 (2012). The Author acknowledges that the male experience and female experience cannot be essentialized given that the intersection of various aspects of identity from socioeconomic status to national origin make each person unique.
perceived as unworthy intruders ill-suited for leadership who attain rank primarily because of their sex, not their merit. The prevalence of these attitudes among VMI cadets likely exacerbates tension between the sexes at VMI and undermines institutional efforts to foster leadership, solidarity, and mutual respect.

Because perception is often a product of culture, it is impossible to fully understand cadet attitudes toward women in leadership without first exploring the unique context in which these perceptions arise. As such, Part One of the Article recounts the history and traditions of VMI as well as the landmark litigation that prompted it to admit women. Part Two outlines our survey’s methodology and summarizes the results relating to perceptions of female leaders. Finally, Part Three explores potential explanations of and implications for our findings.

II. BACKGROUND

A. History of VMI

Much like Silicon Valley and Wall Street, VMI is arguably a microclimate that fosters hypermasculinity and sex stereotypes. According to Professor Laura Brodie, “VMI is a very Southern school in a very Southern town.” Established in 1836 by an act of the Virginia State Legislature, VMI was the nation’s first state-sponsored military school. Its noble mission was: to produce educated and honorable men, prepared for the varied work of civil life, imbued with love of learning, confident in the functions and attitudes of leadership, possessing a high sense of public service, advocates of the American democracy and free enterprise system, and ready as citizen soldiers to defend their country in time of national peril.

Still today, VMI accomplishes this mission through a singular adversative approach characterized by physical rigor, mental stress, and

3. See infra Appendix.
5. Id.
6. Id. at 13.
the absence of privacy. While proponents of this singular pedagogy staunchly defend it, it has elsewhere been described as “demeaning and degrading,” “sadistic,” and “antiquated.” Defining features of the VMI experience include a strictly enforced Honor Code, class system, and a “dyke system” that assigns a senior, or “first classman,” mentor to each freshman, or “fourth classman.” VMI contends that its distinctive educational approach emphasizes overcoming adversity, thriving under pressure, and developing strength of character. VMI further aims to promote egalitarianism and homogeneity as manifested in its uniforms, haircuts, and even its architecture, which mimics a prison and creates a near absolute lack of privacy.

Like everything else at VMI, daily life is spartan and structured. Four

8. Brodie, supra note 4, at 15.
9. In a 1997 letter published in a Lexington newspaper, Colonel Lee Lewane, a VMI graduate and Lexington resident, criticized VMI’s adversative pedagogy as follows:

   The demeaning and degrading verbal treatment of new cadets and, worse yet, physical humiliation that is sadistic in nature, is disgusting and antiquated. It must be immediately replaced with a style of cadet leadership that is inspiring, yet no less demanding. A mixture of velvet and steel. Gen. Creighton Abrams, former Army Chief of Staff once remarked “Build on what a man is, don’t tear him down.” Those who subscribe to a philosophy that a person should be shorn of his dignity and personality and then built back up again midst shouts and screams is an affront to parents. By and large, mothers and fathers who send their sons and daughters to VMI have discharged their parental responsibilities of inculcating in them such sterling qualities of integrity, loyalty, commitment and recognition between right and wrong.

Id. at 40–41. Gordon Davies, former head of the State Council of Higher Education for Virginia, also disapproved of VMI’s adversative system. Philippa Strum, Women in the Barracks: The VMI Case and Equal Rights 89 (2002); see also Peter Finn, Former Rats Remember Torturous Times at VMI, Wash. Post (Aug. 20, 1997), http://www.washingtonpost.com/wp-srv/local/longterm/library/vmi/vmi20.htm [https://permac.cc/4ZKH-QKRL] (One VMI graduate recounted, “I remember the shock of those first few days… It’s like being a hostage.”); id. (Another observed, “It is an intense and formidable process.”).

10. United States v. Virginia, 518 U.S. 515, 522 (1996). Use of the term “dyke” originates from the phrase to “dyke out” (a mispronunciation of “to get all decked out”), which referred to putting on the white cross belts of a cadet’s dress uniform; doing so required assistance from another cadet. Va. Mil. Inst., 2016–2017 New Cadet Handbook 17 (2016). In VMI’s mentorship system, “dyke” refers to the first classman mentor assigned to offer advice and support to a “rat” or first-year cadet. Id.


12. See Brodie, supra note 4, at 6; see also Strum, supra note 9, at 44.

13. See Strum, supra note 9, at 44.
cadets share a room that is less than 300 square feet in size and equipped with one sink. Each cadet has a bed, a wall locker, and a clothes rack. There are no telephones, televisions, air-conditioning, or even pictures on the wall. Cadets rise early, performing chores for their dykes and completing sit-ups, pull-ups, and a short run—all before breakfast.

Aside from the sparse accommodations, another distinction that sets VMI apart is its Honor Court and Honor Code, which date back to 1839. VMI’s Honor Code makes clear that “[a] cadet does not lie, cheat, steal, nor tolerate those who do.” The Honor Court of Cadets is elected from the upper two classes and enforces the Honor Code. Individuals who violate the Honor Code are subject to a “drumout” in which snare and bass drums are beaten as the dishonored former cadet is physically expelled from the school. The Honor Court President announces that the dismissed cadet “has placed personal gain above personal honor and has left the Institute in shame. His [or her] name will never be mentioned in the four walls of [the] Barracks again.” The cadets turn their backs on the exiled student and return to bed. The expelled student’s name can never again be uttered in Barracks. VMI’s strong emphasis on honor creates a unique environment where doors are rarely locked, and cadets may leave valuables unattended without fear of theft.

Another singular feature of the VMI experience is the class system, a plan of self-governance in which cadets exercise authority and enjoy privileges based on class rank. “Each class has specific responsibilities. The first class, or seniors, are responsible for providing overall leadership, writing the standard operating procedures for the rat line for the following
year, [and] supervising the rat breakout ....”27 Third classmen discipline rats.28 In upholding VMI’s single-sex admissions policy, the District Court would later conclude, “[t]he degree and harshness of the regulations imposed through the class system is possible only through a peer system.”29

The Dyke System further sets VMI apart. Each rat is assigned a first classman mentor called a “dyke.”30 Through the system, “senior cadets establish a familial, mentoring relationship with rats who perform menial chores” for them.31 During the subsequent VMI litigation, the District Court observed that the Dyke System facilitates a sense of loyalty among brother rats, “creates a cross-class bonding[,] and provides a model for leadership and support.”32

Perhaps the most salient feature of the VMI experience is the infamous Ratline, a seven-month system of intense hazing that aims to break down each student’s individuality and rebuild him or her into a VMI cadet.33 The fourth classmen who must endure the Ratline “are called ‘rats’ because the rat is ‘probably the lowest animal on earth.’”34 Hallmarks of the Ratline include “indoctrination, egalitarian treatment, rituals ... minute regulation of individual behavior, frequent punishments, and use of privileges to support desired behaviors.”35 Typically, 4% of cadets leave during the first week of the Ratline, and 25% withdraw by the end of their first year at VMI, which is more than twice the attrition rate of federal service academies.36 Although the Ratline has been criticized, many current students and alumni claim that they forge lifelong, ironclad bonds in the Ratline’s hellish environment, generating an indissoluble sense of solidarity akin to that of a fraternity or close family.37 As Colonel N. Michael Bissell, former

28. id. at 1423.
29. id.
30. id.
31. BRODIE, supra note 4, at 42.
33. BRODIE, supra note 4, at 6.
35. Id. at 1422; see also Michael Kimmel, Saving the Males: The Sociological Implications of the Virginia Military Institute and the Citadel, 14 GENDER & SOCY 494, 498 (2000) (“The brutality of the adversative system implants a deeply felt bonding among the men; solidarity among cadets is intense and loyalty of alumni is fierce.”).
36. STRUM, supra note 9, at 48.
37. BRODIE, supra note 4, at 40-41; see also Finn, supra note 9 (Alumnus Sam Witt (“58)
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Commandant of Cadets at VMI, observed:

I like to think VMI literally dissects the young student that comes in there, kind of pulls him apart, and through the stress, everything that goes on in that environment, would teach him to know everything about himself. He truly knows how far he can go with his anger, he knows how much he can take under stress, he knows how much he can take when he is totally tired, he knows just exactly what he can do when he is physically exhausted, he fully understands himself and his limits and capabilities. Something I think is the mainstay of leadership. I think every VMI man that leaves there knows a great deal about his human capacity to do things under all kinds of duress and stress.38

Although VMI never aimed to serve as a direct pipeline to the military, VMI employs military training to instill values that it believes equally essential to effective leadership in both military and civilian life.39 According to expert Colonel John Walter Ripley, VMI’s adversative pedagogy, particularly the Ratline, Dyke System, and Class System, aims to cultivate the qualities salient to combat leadership: namely, self control, self discipline, and the belief that you must subordinate your own personal desires and well-being to the good of the whole unit.40 Indeed, The Rat Bible,41 which every rat must memorize and carry at all times,42 encourages rats to abandon individualism; it further states, “Do not quit. Do not falter. Each time you are set back charge forward even harder.”43 Perhaps unsurprisingly, one trial expert opined that VMI takes “average” students and through character development, produces individuals with above average dedication, self-motivation, and character.44 As a result, VMI graduates are well prepared to both overcome adversity and to help others overcome it.45

observed, “They stretch you and stretch you…You learn something about yourself. And you form these bonds that last a lifetime, which is about the only justification for the admitted silliness of it all.”.

39. Id. at 1427.
40. Id.
41. Strum, supra note 9, at 39.
42. Id.
43. Id. at 42.
45. Id. at 1427.
Perhaps for this reason, VMI has produced countless leaders who were “prepared for the varied work of civil life” and “ready... to defend their country in time of peril.”\(^{46}\) Chief among them are Five-Star Army General George S. Patton, soldier and statesman George Marshall,\(^ {47}\) former U.S. Attorney General Tom Clark, sculptor Moses Ezekiel, actor Dabney Coleman, and producer Mel Brooks.\(^ {48}\) Indeed, since 1842, at least 13,954 VMI alumni have served in the armed forces during wartime.\(^ {49}\) Of these, at least 10,233 were commissioned officers, and 128 were flag officers.\(^ {50}\) These graduates seemingly exemplify the quote that still remains on VMI’s Jackson Arch—“You May Be Whatever You Resolve to Be.”\(^ {51}\)

In recognition of the bonds forged and values instilled at VMI, grateful alumni are incredibly supportive, both financially and otherwise. Consequently, VMI enjoys one of the largest endowments per capita of any public college in America.\(^ {52}\) Along with wealth, VMI alumni also yield significant societal and political influence, particularly in Virginia.\(^ {53}\) According to the *Washington Post*, VMI alumni in Virginia hold a
“disproportionately large number of influential positions” and boast, *inter alia*, two congressmen, two state senators, the former speaker of the House of Delegates, the managing partners of the state’s two biggest law firms, and numerous industrialists and investors, all of whom are fiercely loyal to VMI. It was no surprise then that VMI alumni mobilized to defend their beloved alma mater when its all-male admissions policy eventually came under attack.

**B. U.S. v. Virginia**

Although it was well known that VMI was a single-sex institution, 347 women inquired about admission to VMI between 1988 and 1990. VMI responded to none. That all changed when VMI denied admission to an anonymous female high school student who consequently filed a complaint with the Attorney General. In response, the United States Department of Justice sued the Commonwealth of Virginia, alleging that VMI’s all-male admissions policy violated the Equal Protection Clause of the Fourteenth Amendment. VMI countered that admitting women would destroy the VMI experience women sought to enjoy and that single-sex education brought diversity to Virginia’s public university system.

VMI won the first battle but ultimately lost the war. The District Court

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54. *Id.* Indeed, political theorists wondered why the Bush administration permitted the Department of Justice to pursue the litigation given the power and influence of VMI’s alumni in Virginia politics and Bush’s need for Virginia’s electoral votes in his bid for reelection in 1992. *Id.* at 90.

55. *Virginia*, 766 F. Supp. at 1436, *vacated*, 976 F.2d 890, *aff’d*, 518 U.S. 515. Because VMI had never attempted to recruit women and VMI’s well-known single-sex admissions policy had likely preempted most women from applying, there was little or no hard evidence, aside from the inquiries, regarding women’s interest in attending VMI. *Id.*

56. *Virginia*, 518 U.S. at 523. VMI originally sent letters to female applicants informing them that VMI was single-sex but had adopted a no-response policy in the two years prior to the litigation. *Virginia*, 766 F. Supp. at 1436.


59. *Id.*

60. *Id.* at 540.

upheld VMI’s admissions policy, but a three-judge panel of the United States Court of Appeals for the Fourth Circuit (“Fourth Circuit”) vacated that judgment. Because the Fourth Circuit accepted the District Court’s finding that coeducation would “materially affect[]” aspects of the VMI experience, the Fourth Circuit offered VMI three options: admit women, forfeit public funding, or establish a comparable, parallel women’s program.

VMI chose the latter. In September of 1993, the VMI Foundation established the Virginia Women’s Institute for Leadership (VWIL) at Mary Baldwin College, a four-year women’s college thirty miles north of VMI’s campus in Lexington, Virginia. Demonstrating the vastness of VMI’s endowment, on September 25, the VMI Board and VMI Foundation voted to provide VWIL with an operating endowment of approximately $5.5 million, a scholarship endowment of $500,000, and a building renovation fund of $500,000.

VWIL became operational in September of 1994. VWIL cadets took nine hours in arts, humanities and social sciences, six hours of writing, three hours in calculus and statistics, eleven hours of sciences, six hours of international education, four hours of leadership, and three hours of leadership internships. VWIL involved a student-run, one-week wilderness program, Honor System, community service projects, leadership programming, and a confidence-building program, which required students to complete obstacle courses. “Though acknowledging that studies showed that women tended to follow ‘interactive’ leadership models and men ‘hierarchical’ models, the VWIL plan specifically rejected ‘the view that the models can only be gender specific.’”

In addition to the features noted above, VWIL also differed from VMI in several other ways—distinctions that ultimately proved fatal. First,
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VWIL did not employ the adversative system or have a Ratline. Nor did VWIL cadets live in separate barracks or eat together. Cadets wore uniforms only three days per week and attended ROTC classes at VMI. VWIL did not issue arms to students. VMI had an NCAA competition level track and field facility, and baseball, soccer, and lacrosse fields. The minimum physical fitness requirement at VMI consisted of 60 sit-ups and 5 pull-ups in two minutes and a 1.5-mile run in 12 minutes. By comparison, VWIL modeled its physical fitness standards upon the military standard for women, requiring 28 pushups in two minutes, 60 full body sit-ups in two minutes, a flexed arm hang of at least 15 seconds, and a 1.5-mile run in 14 minutes 24 seconds. Notably, however, at the end of year one of VWIL, female VWIL cadet Trimble Bailey was named by VMI’s Air Force ROTC Department as the top first-year cadet, outperforming 127 male VMI classmates.

Despite these differences, the District Court approved VWIL, stating that “controlling legal principles … do not require the Commonwealth to provide a mirror image VMI for women.” In so doing, the District Court noted, “[i]f VMI marches to the beat of a drum … then Mary Baldwin marches to the melody of a fife, and when the march is over, both will have arrived at the same destination.” In January of 1995, a divided Fourth Circuit affirmed. Judge James Dickson Phillips, Jr.—a former law school professor, U.S. Army First Lieutenant, and Purple Heart recipient—dissented, arguing that VWIL fell too “far short” of VMI to be deemed sufficiently comparable. In a split opinion, the Fourth Circuit subsequently denied a rehearing en banc.

72. BRODE, supra note 4, at 20.
73. Id.; SYRUM, supra note 9, at 205.
74. BRODE, supra note 4, at 20.
75. SYRUM, supra note 9, at 205.
76. Id.
77. Id. at 206.
78. Id.
79. BRODE, supra note 4, at 21.
81. BRODE, supra note 4, at 21.
82. Id.
84. Virginia, 518 U.S. at 530.
The United States petitioned the U.S. Supreme Court for certiorari on May 26, 1995, and the Supreme Court granted that petition on October 5, 1995. The Supreme Court heard oral argument on January 17, 1996. Arguing on behalf of the United States, attorney Paul Bender conceded, "most women can't do this. The question in this case is whether, because most women can't do it … the State is constitutionally entitled to exclude all women." He further noted, "[i]t has to do with whether men will perceive that women can take the heat." Bender described VMI as a "place to teach manly values that only men can learn, to show that men can suffer adversity and succeed" and characterized VWIL as an institution "designed to teach to women womanly values, feminine values." Bender said that VWIL was inadequate because it did not employ VMI's adversative method and lacked "the value of having the VMI degree as a mark of your ability to survive the program as a member of the … brotherhood of VMI graduates." According to Bender, "the opportunity that women are not given in Virginia is to show that they can do it on a level with men." Bender analogized to legal education, contending that it would have been impermissible to establish all-female law schools that did not utilize the Socratic Method even though that method, like VMI's adversative approach, had been developed in an all-male environment before women could enter the legal profession.

Arguing on behalf of Virginia, attorney Ted Olson countered that if VMI

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88. See Transcript of Oral Argument, United States v. Virginia, 518 U.S. 515 (1996) (Nos. 94-1941, 94-2107). Although the Government never explicitly argued that single-sex education is a per se violation of the Fourteenth Amendment, two amicus briefs were filed in support of VMI, including one from three women's colleges—Mary Baldwin, Southern Virginia College for Women, and St. Mary's College of North Carolina. STRUM, supra note 9, at 198. Another set of women's colleges—Wells, Hollins, Sweet Briar, and Randolph-Macon—filed a second amicus brief, arguing "that the suspicion thrown on single-sex programs by the appeals court could result in legal challenges to battered women's shelters and single-sex prisons." Id.
90. Id. at 8.
91. Id. at 10.
92. Id. at 17.
93. Id. at 20–21.
94. Id. at 22–23.
was unconstitutional, VWIL would be as well.\textsuperscript{95} Olson argued that VWIL was designed by experts focused on how to best educate young people.\textsuperscript{96} He opined, “[t]he VMI program is designed to create leaders and adults who can operate in the civilian or in the military world, who have a sense of responsibility, the same goals, in other words, that the VWIL program is set up to do.”\textsuperscript{97}

VMI’s arguments proved unavailing. On June 26, 1996, a 7–1 majority of the Supreme Court held that VMI’s refusal to admit women violated the Equal Protection Clause.\textsuperscript{98} Writing for the Majority, Justice Ruth Bader Ginsburg—a longtime advocate for equal rights\textsuperscript{99}—concluded that VMI had not been established as an all-male school in order to increase diversity in Virginia’s educational system.\textsuperscript{100} She emphasized that “[i]nherent differences’ between men and women… remain cause for celebration, but not for denigration of the members of either sex or for artificial constraints on an individual’s opportunity.”\textsuperscript{101} Nor may “[s]tate
actors . . . exclude qualified individuals based on `fixed notions concerning the roles and abilities of males and females.' 102 She stressed that "some women can meet the physical standards now imposed on men," 103 VMI's adversative educational style "could be used to educate women," 104 and "that some women may prefer it to the methodology a women's college might pursue." 105 As she explained, "[i]t is on behalf of these women that the United States has instituted this suit, and it is for them that a remedy must be crafted, a remedy that will end their exclusion from a state-supplied educational opportunity for which they are fit." 106 She further observed, "[t]he notion that [the] admission of women would downgrade VMI's stature, destroy the adversative system and, with it, even the school, is a judgment hardly proved, a prediction hardly different from other 'self-fulfilling prophesies' once routinely used to deny rights or opportunities." 107 For these reasons, a majority of the Supreme Court determined that VMI's single-sex admissions policy was unconstitutional. 108 In a scathing dissent, Justice Antonin Scalia criticized the majority opinion as "'politics-smuggled-into-law'" and observed that being all male was essential to the VMI experience. 109 Somewhat ironically, as a result of United States v. Virginia, women now had two options for military education and leadership training: all-female VWIL and coeducational VMI. 110

Cadet reactions to the decision "ranged from anger, to apathy, to determined professionalism." 111 For the most part, however, the VMI community mobilized to make the mission of coeducation as successful as possible: "hundreds of people on VMI's Post—from cadets, to faculty, to

102. Virginia, 518 U.S. at 541 (quoting Hogan, 458 U.S. at 725).
103. Id. at 525 (quoting United States v. Virginia, 976 F.2d 890, 896 (4th Cir. 1992)).
104. Id. at 540 (quoting United States v. Virginia, 852 F. Supp. 471, 481 (W.D. Va. 1994)); see also id. at 541 (emphasizing that VMI's mission of producing citizen-soldiers is not inherently unsuitable for women).
105. Id. at 540; see also id. at 542 ("Education, to be sure, is not a 'one size fits all' business.").
106. Id. at 550–51 (footnote omitted).
107. Id. at 542–43 (internal citation omitted); see also id. at 550 ("[G]eneralizations about 'the way women are,' estimates of what is appropriate for most women, no longer justify denying opportunity to women whose talent and capacity place them outside the average description.").
108. Id. at 545–46.
109. Id. at 566, 569 (Scalia, J., dissenting).
111. BRODIE, supra note 4, at 99.
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laundry workers—all came together to prepare for the arrival of women.”

According to Lieutenant General Winfield S. Scott, former Superintendent of the Air Force Academy, “no other military college had done so much to prepare for the arrival of women.”

In any event, the epic legal battle of the sexes that had been waging in federal courts for years had finally come to an end. On August 18, 1997, the first female cadets arrived. In a welcome address to the first coeducational class in VMI history, VMI Superintendent Josiah Bunting made clear, “[w]e do not care if you are poor or rich, black or white, female or male, Taiwanese or Virginian. We care about your heart and your determination. We care about your integrity.”

That is not to say that assimilation occurred without incident. Resistant students purportedly scribbled “2000 LCWB” (“Last Class with Balls”) on desks. Some members of the Class of 2000 even had LCWB inscribed on their rings and changed the zero in 2000 to the male symbol σ. Two African-American female rats reportedly noticed the most hostility, which they perceived as most prevalent among VMI “legacies,” (18% of the student body at the time) whose fathers and grandfathers had attended an all-male and for some, all-white, VMI. A male rat published a cartoon in *The Cadet*, a student newspaper, showing Breakout Hill, the location of the Ratline graduation ritual, with signs directing men to the right and women to the left; on the women’s side, a ladder extended up the hill, with a VMI administrator waiting at the top, saying “By far the hardest Rat-Line.”

### III. METHODOLOGY AND RESULTS

Although many scholars explored the immediate aftermath of *U.S. v. Virginia*, what was the lasting impact of the decision on VMI and its student body? To explore this question, I collaborated with a sociologist and psychologist to anonymously survey VMI’s student body. Part Two of

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112. *Id.* at xiv.
113. *Id.*
114. *Id.* at 197.
115. *Id.* at 217. That was the sole mention of coeducation in General Bunting’s opening remarks. *Id.*
116. *Id.* at 254.
117. *Id.* at 343–44.
118. *Id.* at 254.
119. *Id.* at 320.
120. *See generally id.*; STRUM, supra note 9.
the Article explains our survey methodology and summarizes the survey results pertaining to how VMI cadets define leadership and perceive female cadets in positions of power.

A. Methodology

Although initial resistance to coeducation was predictable, my co-researchers and I wondered what attitudes toward female cadets persisted at VMI more than a decade after the first women had matriculated. To explore this question and the countless others subsumed within it, we used SurveyMonkey, a reputable web-based survey solution, to administer an anonymous online questionnaire to VMI’s entire student population.121 We then used Statistical Package for the Social Sciences (SPSS) to analyze the data. Three hundred sixty-four students responded, including 311 men (85.44%) and 53 (14.56%) women.122

Like all empirical studies, our survey is subject to certain methodological limitations. First, our findings reveal only correlation, not causation. Yet they are probative nonetheless. The sample size and methodological limitations of our results do not permit sweeping conclusions regarding attitudes toward female cadets. Instead, such conclusions must be narrowly drawn. This is particularly true since the individual who chooses to attend VMI may not be representative of the prototypical man or woman in society at large. This, in turn, may contribute to another issue—self-selection bias, which may occur when individuals volunteer to participate in a group from which the survey is taken.123 Relatedly, participation bias may occur due to the characteristics of the students who choose to participate, here, individuals who choose not only to attend VMI but also to participate in a survey about the impact of coeducation there.124 Although participants were guaranteed anonymity,


that may not entirely alleviate the potential impact of response bias, which relates to a possible tendency of respondents to give inaccurate or untruthful answers.\textsuperscript{125} Despite these limitations, however, it is plausible, perhaps even probable, that the same or similar attitudes expressed by our respondents persist in other male-dominated spheres. Thus, the insights gained from our study may have implications for those hypermasculine environments as well.

Response rates per class were fairly proportional. One hundred first classmen or seniors, including 85 men and 15 women; 83 second classmen or juniors, including 72 men and 11 women; 87 third classmen or sophomores, including 73 men and 14 women; and 94 fourth classmen or freshmen, including 81 men and 13 women participated in our survey.\textsuperscript{126} Most respondents—236 students—planned to enter the military.\textsuperscript{127}

\section*{B. Results}

Placing women into positions of authority at VMI initially proved problematic and may still be so today. During the first year of assimilation, there were no female students in Cadre leadership.\textsuperscript{128} That changed in the spring of 1999 when the first two women became members of Cadre.\textsuperscript{129} In response, a cadet newspaper published an article questioning their qualifications.\textsuperscript{130} Third class women also met resistance when trying to discipline male rats; some male dykes allegedly told their male rats to ignore female upperclassmen, and this disrespect was not confined to peers.\textsuperscript{131} Indeed, when a female faculty member attempted to discipline male cadets, male students allegedly came out onto their stoops and loudly called her a “bitch” and “whore.”\textsuperscript{132}

\begin{footnotesize}
\begin{itemize}
\item[126.] At VMI, freshmen are referred to as “rats” until completing “Breakout” and are deemed “fourth classmen” thereafter. United States \textit{v.} Virginia, 766 F. Supp. 1407, 1422–23 (W.D. Va. 1991) \textit{vacated}, 976 F.2d 890 (4th Cir. 1992), \textit{aff'd}, 518 U.S. 515. Sophomores are “third classmen,” juniors are “second classmen,” and seniors are “first classmen.” \textit{Id.}
\item[128.] \textit{See} BRIDIE, supra note 4, at 348–49.
\item[129.] \textit{Id.}
\item[130.] \textit{Id.} at 349.
\item[131.] \textit{Id.} at 348.
\item[132.] \textit{Id.} at 174–75.
\end{itemize}
\end{footnotesize}
However, given the importance of leadership at VMI and in the military, it is important to know whether there is a difference in the extent to which cadets accept women versus men in positions of leadership. If female cadets are to be fully accepted at VMI, then it is vital that students accept them as both peers and leaders.

To explore cadet perceptions of leadership, we first examined which two characteristics cadets believe are most essential to effective leadership. Next, we assessed whether cadets more typically associate these characteristics with men or women. Finally, we surveyed perceptions toward men and women in positions of leadership. Our results indicate that most cadets believe that male cadets display superior leadership ability at VMI, and when the vast majority (72.51%) of respondents see a woman “selected for a high position or award,” they assume she was chosen primarily because of her sex.133

Perceptions of leadership hinge upon how cadets define that term; in other words, what qualities are integral to effective leadership? To determine this, we asked students to “list in order of importance the two most significant characteristics essential to being a good leader.” Although the textual responses we received vary too widely for coding, common responses include “honor,” “integrity,” “competence,” “respect,” “courage,” “empathy,” “honesty,” “selflessness,” “confidence,” “intelligence,” and “discipline.”134 We next asked respondents to explain whether they associate their response more closely with women or men. Standing alone,

133. See infra Appendix.

134. By comparison, a 2015 Pew Report indicated that “good” leaders are compassionate, organized, honest, innovative, intelligent, ambitious, and decisive. In that study, 29% of respondents associated honesty more with women than men, while 3% say honesty applies more to men than women. 67% stated that men and women possess honesty in equal measure. 65% of respondents indicated that women were more compassionate than men, while 48% said women were also more organized than men. 27% of respondents opined that men are more decisive than women; only 9% thought women were more decisive. 21% stated that men are more ambitious than women, while 9% said women are more ambitious than men. Chapter 2: What Makes a Good Leader, and Does Gender Matter?, PEW RES. CTR. (Jan. 14, 2015), http://www.pewsocialtrends.org/2015/01/14/chapter-2-what-makes-a-good-leader-and-does-gender-matter/ [https://perma.cc/T3WD-TE36] [hereinafter What Makes a Good Leader], “Fully 37% of all adults say men are better at dealing with national security and defense; only 5% say women do a better job in this area.” Women appeared more likely than men to say that female political leaders are better at dealing with social issues such as education and health care and somewhat more likely to say that female leaders are better at handling economic conditions. Very few women (5%) say that female leaders do a better job than their male counterparts in dealing with national security, and 59% of women believe men and women handle national security equally well. Id.
none of the most common characteristics are facially gendered. In light of this, our results are particularly illuminating.

After noting the two most significant characteristics essential to good leadership, 50.5% of respondents (163) indicated that the most important leadership characteristic was more often associated with men.135 45.8% (148) felt that it was associated equally with both sexes.136 Only 3.7% (12) indicated that it was more often associated with women.137 With respect to the second most important leadership characteristic, 49.2% (158) believed it was more often associated with men.138 44.5% (143) felt it was associated equally with both sexes.139 6.2% (20) believed it was more often associated with women.140

Further breaking down the data by sex, 54.18% (149) of men and 29.17% (14) of women stated that the most important leadership characteristic they had identified was more often “associated” with men.141 2.55% (7) of men and 10.42% (5) of women said the characteristic was more often “associated” with women.142 43.27% (119) of men and 60.42% (29) of women said that the trait was associated with “both sexes equally.”143 Forty-one students skipped the question,144 perhaps in part because defining the qualities inherent in effective leadership required a textual response, which was more time-consuming.145

Likewise, 54.58% (149) of men and 18.75% (9) of women stated that the second most important leadership characteristic they had identified was more often “associated” with men.146 3.66% (10) of men and 20.83% (10) of women said the characteristic was more often “associated” with

135. *See infra* Appendix.
136. *Id.*
137. *Id.*
138. *Id.*
139. *Id.*
140. *Id.*
141. *Id.*
142. *Id.*
143. *Id.*
144. *See id.*
145. By comparison, in the 2015 Pew Report, among those who say honesty is an essential quality for a leader, 68% say that both sexes possess this trait in equal measure. 87% opine that intelligence is also found equally, and among those who say decisiveness is a trait salient to leadership, 61% believe the sexes display the trait equally. *What Makes a Good Leader*, supra note 134.
146. *See infra* Appendix.
women.\textsuperscript{147} 41.76\% (114) of men and 60.42\% (29) of women said that the trait was associated with “both sexes equally.”\textsuperscript{148} Forty-three students skipped the question.\textsuperscript{149} Thus, a sizeable minority of male cadets and a majority of female cadets believe that men and women possess characteristics salient to effective leadership in equal measure.

Despite this, however, most cadets still believe that men “typically display[] superior leadership ability at VMI.”\textsuperscript{150} Indeed, not a single male cadet stated that women typically display superior leadership ability at VMI, and surprisingly, only five women, or 10\%, indicated that women display superior leadership ability at VMI.\textsuperscript{151} By comparison, the vast majority of men—80.33\% (241)—and nearly a third of women—30\% (15)—believe that men typically display superior leadership ability at VMI.\textsuperscript{152} Roughly a quarter of respondents, including 19.67\% of men (59) and 60\% of women (30), believed that men and women displayed superior leadership ability in equal measure.\textsuperscript{153} Fourteen students skipped this question.\textsuperscript{154} The markedly different responses can perhaps be attributed to the fact that our first question simply referred to the qualities inherent in being a “good leader,” while the question regarding leadership ability focused responses on displays of leadership at VMI, not in society at large. This may suggest that male cadets are more favorable to and accepting of female leadership outside VMI, such as in the civilian sector, than within their home institution where it will directly impact them.

Given VMI’s strong emphasis on physical prowess, this attribute may also engender respect, loyalty, and admiration from subordinates. However, when asked which sex “typically displays superior physical prowess at VMI,” 97.67\% (294) of male respondents said that men do.\textsuperscript{155} 2.33\% (7) of men said that men and women equally display superior physical prowess.\textsuperscript{156} 41.76\% (114) of women also said that both sexes equally display this trait; only five women said that women typically display superior physical prowess at VMI.\textsuperscript{157}

\textsuperscript{147}  Id. 
\textsuperscript{148}  Id. 
\textsuperscript{149}  Id. 
\textsuperscript{150}  See id. 
\textsuperscript{151}  By comparison, according to a 2015 Pew Report, “[m]en are slightly more likely than women to say that men make better political leaders (17\% vs. 12\%), and men are more likely than men to say women make better leaders (11\% vs. 7\%).” \textit{What Makes a Good Leader}, supra note 134.
\textsuperscript{152}  See infra Appendix. 
\textsuperscript{153}  Id. 
\textsuperscript{154}  See id. 
\textsuperscript{155}  Id. at 178–79.
physical prowess at VMI. No male stated that women exhibit superior physical prowess. By comparison, 2% (1) of women believed that women typically display superior physical prowess at VMI. 90% (45) of female respondents believed that men typically display superior physical prowess, and 8% (4) of women believed that the sexes display it in equal measure at VMI. Thirteen students skipped this question. The heavy emphasis VMI places upon physical strength may increase the likelihood that VMI cadets come to perceive physical prowess as synonymous with the kind of strength salient to good leadership. Thus, to the extent that being perceived as possessing superior physical prowess earns a cadet and leader respect, women are less likely to be seen as strong leaders. This may further extend to displays of strength that engender respect in combat or “in the varied work of civilian life.”

Like strength and valor, intelligence is another attribute critical to effective leadership. Accordingly, we asked respondents to share their perceptions regarding which “sex typically displays superior academic performance at VMI.” 10.30% (31) of male respondents stated that women showed superior academic performance at VMI. 28.57% (86) of male respondents said that men typically display superior academic performance at VMI. A majority—61.13% (184)—of male respondents said that men and women equally display superior academic performance at VMI. With regard to female respondents, 38% (19) of women believed that women typically display superior academic performance at VMI. Six percent (3) of female respondents believed that men typically display superior academic performance at VMI, and 56% (28) of women believed that the sexes equally displayed superior academic performance at VMI. Thirteen students skipped this question. Thus, to the extent

156. Id.
157. Id.
158. Id.
159. Id.
160. Id.
161. VA. MIL. INST., supra note 10, at 5.
162. See infra Appendix.
163. Id.
164. Id.
165. Id.
166. Id.
167. Id.
168. See id. By comparison, in a 2015 Pew Center report, 55% of respondents believed
academic performance is a proxy for intelligence and intelligence is viewed as salient to effective leadership, cadets may be likelier to believe that men and women are equally likely to be good leaders. Yet given VMI’s unique adversative pedagogy, one could speculate that academic prowess and relatedly, intelligence, may be less valued in VMI’s hypermasculine environment and physically demanding Ratline as compared to a non-adversative, non-military educational setting that does not employ an adversative approach like VMI’s neighboring university, Washington and Lee.

After assessing how students define leadership and examining their perceptions of which sex more typically displays superior leadership ability, we next explored cadet perceptions of female cadets who attain rank or receive awards. Given that most respondents believe that men usually display superior leadership ability and physical prowess at VMI, it is somewhat unsurprising that the vast majority of respondents—72.51%—assume that female cadets selected for a high position or award are chosen not because of merit but instead to, *inter alia*, create an appearance of sex equality, avoid further sex discrimination lawsuits, attract female applicants, and retain current female students.169 Only 22.18% (65) of male respondents as compared to 59.18% (29) of female respondents agreed with the statement, “[w]hen I see that a female cadet is selected for a high position or award, I think . . . she must have deserved it.”170 By comparison, 77.82% (228) of male respondents and 40.82% (20) of female respondents stated, “when I see a female cadet is selected for a high position or award, I think . . . she was chosen primarily because she was female.”171 Twenty-two students skipped the question.172 Notably, the majority of male respondents but also a sizeable minority—40.82%—of female respondents agreed that females in high positions are usually

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169. See infra Appendix.
170. Id.
171. Id.
172. Id.
selected primarily due to sex. Yet nearly a quarter of male respondents—22.18%—and only a slight majority of female respondents—59.18%—believe that female cadets are selected for high positions or awards primarily due to merit. These findings may suggest that, many female cadets who attain rank or receive awards, particularly those who refuse or fail to conform to gendered notions of leadership, may be stamped with a “badge of inferiority,” which could potentially undermine their authority from the outset. As one respondent explained, “[i]f a woman has rank or a leadership position, unless she is known throughout the corps as an achiever, it is assumed that rank or position was given to her, that she did not merit it.” Another observed, “some of the female Cadet Captains… [are] not academically savvy… it blows my mind how [one woman] got put in charge of academics for the entire corps… other than the fact that she’s a girl.” A cadet who believes his or her supervisor is undeserving of and ill-suited for the position of authority may be less likely to afford her the respect to which she is entitled, undermining their relationship and perhaps adversely impacting her performance and perception as a leader.

Respondents’ widespread assumptions that many female leaders attain rank primarily due to sex may illuminate why some cadets feel uncomfortable with a female supervisor. Indeed, 20.81% (62) of male respondents and 95.92% (47) of female respondents “strongly agree[d]” with the following statement: “I don’t mind having a keydet of the opposite sex in a leadership position supervising me.”

173. Id.
174. Id.

About two-thirds of Americans, including majorities of men and women alike, say it is easier for men than women to get elected to high political offices and to get top executive positions in business, but women are more likely to express this view. About three-quarters of women say men have a better shot at these roles, compared with about six-in-ten men, a pattern that is repeated across generations.

Chapter 3: Obstacles to Female Leadership, PEW RES. CTR. (Jan. 14, 2015), http://www.pewsocialtrends.org/2015/01/14/chapter-3-obstacles-to-female-leadership/ [https://perma.cc/3M3R-GZUB] [hereinafter Obstacles to Female Leadership].

175. In Grutter v. Bollinger, Justice Thomas asserted that affirmative action “programs stamp minorities with a badge of inferiority and may cause them to develop dependencies or to adopt an attitude that they are ‘entitled’ to preferences.” Grutter v. Bollinger, 539 U.S. 306, 373 (2003) (Thomas, J., concurring in part, dissenting in part).

176. A keydet is a positive nickname for VMI cadets, which refers to a school mascot of sorts, much like UVA Cavaliers sometimes self-identify as “Wahoos.”

177. See infra Appendix.
male respondents and 4.08% (2) female respondents “somewhat agree[d].”178 19.46% (58) of men and no women “somewhat disagree[d].”179 24.16% (72) of men and no women “strongly disagree[d].”180 Seventeen students skipped the question.181 In other words, 100% of the female respondents are comfortable with a male supervisor.182 56.4% of men felt similarly about a female supervisor, but 43.6% of the men would not want a female in a position of authority over them.183

In conclusion, cadets define leadership in various ways but place a premium on traits like honor, integrity, and respect. Although these traits are not gendered on their face, a slight majority of male respondents stated that they associate the two traits they deem most significant to leadership more typically with men.184 Most men believe that males generally display superior leadership ability and physical prowess at VM1.185 A majority of both sexes agree that men and women equally display superior academic performance.186 While female respondents do not mind having a male supervisor, a sizeable minority of male respondents prefer not to have a female supervisor.187 Most respondents assume that female cadets receive rank or awards because of their sex, not their merit.188 But what accounts for these perceptions of female cadets in positions of power? Although our data fails to provide a definitive answer, Part Three of the Article considers potential explanations that, taken together, may account, at least in part, for our results.

IV. Observations

Notably our data captures only the correlation of certain attitudes towards leadership and the respondent’s sex, not whether the respondent’s sex causes him or her to possess those perceptions.189

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178. Id.
179. Id.
180. Id.
181. Id.
182. Id.
183. Id.
184. Id.
185. Id.
186. Id.
187. Id.
188. Id.
189. See id.
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Nonetheless, the non-exhaustive list of observations gleaned from our findings proves quite enlightening.

A. Cadet Perceptions May Reflect Historical Perceptions of and Contemporary Attitudes toward Women in Leadership

Although VMI arguably remains a bastion of masculinity, respondents’ attitudes toward women in leadership at VMI are not unique; rather, they may largely reflect longstanding perceptions of female leaders in other male-dominated spheres, such as politics, law, and business.

Despite America’s purported commitment to freedom and egalitarianism, our nation was founded on a “principle of exclusion.”\(^{190}\) Even our Declaration of Independence proclaims, “All men are created equal,” explicitly excluding women from its embrace.\(^{191}\) Indeed, the architects of America were primarily affluent, heterosexual white males, many of whom owned slaves.\(^{192}\)

Thus, for centuries American women were expected to thrive in a world made by men for men.\(^{193}\) Doing so was no easy task, particularly since the law often subjugated women to the needs and designs of their fathers and husbands.\(^{194}\) Absent exceptional circumstances, colonial marriage and property laws known as “covenant,” denied a married woman the right to own property in her own name or control her own earnings.\(^{195}\) Nor could she even bring suit to redress a wrong.\(^{196}\)

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\(^{190}\) I attribute this articulation to L.T., a historian who shared this insight during a visit to the International Civil Rights Museum in Greensboro, North Carolina, in February of 2016.

\(^{191}\) Dred Scott v. Sandford, 60 U.S. 393, 410 (1856), overruled by U.S. CONST. amend. XIV (emphasis added). Only after the enactment of the Fourteenth Amendment did men of color formally possess equal protection under the law. Yet Jim Crow laws, racial segregation, and other forms of racial inequality persisted long after its enactment.

\(^{192}\) Jane Rutherford, Equality As the Primary Constitutional Value: The Case for Applying Employment Discrimination Laws to Religion, 81 CORNELL L. REV. 1049, 1061 (1996) (“Indeed, the Founding Fathers were affluent ‘insiders.’”) (footnote omitted); A. Leon Higginbotham, Jr., The Relevance of Slavery: Race and The American Legal Process, 54 NOTRE DAME L. REV. 171, 175 (1978).


\(^{194}\) Women and the Law, supra note 193.

\(^{195}\) Id.

\(^{196}\) Id.
could not enter into contracts or serve as guardian to her children, which
confined many women to unhappy, abusive marriages for which there was
little or no recourse.\textsuperscript{197} And the situation was far more dire for female
slaves who were sold, traded, raped, and abused without legal rights or
redress.\textsuperscript{198} Yet women were largely powerless to effect change because
they were prohibited from voting and otherwise participating in the
political process.\textsuperscript{199}

Slowly things changed. Although historically women were often
precluded from holding public office or even voting, through the centuries,
women have played an increasingly prominent role in local and national
politics.\textsuperscript{200} Often such preclusion served as a catalyst, mobilizing women
to fight for equality. For example, when Elizabeth Cady Stanton attended
the World Anti-Slavery Convention in 1840, male abolitionists barred
female delegates from speaking or voting and required them to sit
separately from the men behind a railed enclosure.\textsuperscript{201} This demeaning
treatment purportedly prompted Stanton to become a staunch advocate
for women’s suffrage.\textsuperscript{202} In part due to her efforts, the first petition
advocating for women’s suffrage was adopted and signed in 1848 in
Seneca Falls, New York.\textsuperscript{203} Half a century later, Frances Clock, Clara
Cressingham, and Carrie C. Holly were the first women elected to a state

\begin{footnotesize}
\textsuperscript{197} “Though a married woman was not able to sue or sign contracts on her own, her
husband often did have to obtain her consent before he sold any property his wife had
inherited.” \textit{Id.}

\textsuperscript{198} \textit{Id.}

\textsuperscript{199} U.S. CONST. amend. XIX.

\textsuperscript{200} Some critics of women’s suffrage claimed that giving women the right to vote would
ensure that they would also have the right to hold public office. Even after women obtained
the right to vote, opponents challenged women’s ability to run for and hold public office. For
example, Missouri attorney general Frank McCallister ruled in 1920 that four female candidates
for the state legislature were not qualified to serve because the law stated that “to be member of
the state legislature one must be a male voter and a voter for two years before the election.”
Similarly, the Arkansas Attorney general ruled that women were ineligible to hold public office.
Notably, obstacles to female leadership were not confined to the South. For instance, the New
Hampshire Supreme Court concluded that women were eligible for elected office but could be
ineligible for appointed offices. \textit{Kristi Andersen, After Suffrage: Women in Partisan and
Electoral Politics Before the New Deal} 122 (1996).

\textsuperscript{201} \textit{Judith Wellman, The Road to Seneca Falls: Elizabeth Cady Stanton and the First

\textsuperscript{202} \textit{Id.} at 61–63.

\textsuperscript{203} Judith Wellman, \textit{The Seneca Falls Women’s Rights Convention: A Study of Social
\end{footnotesize}
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legislature.204

It would take decades before a woman served at the federal level, but in 1917 Jeannette Rankin of Montana became the first woman to be elected to Congress.205 Ironically, Congresswoman Rankin was elected to office three years before ratification of the Nineteenth Amendment permitted her to vote in federal elections.206 As of August 2016, approximately 307 women had followed in Rankin’s footsteps.207 However, women comprised 50.8% of the U.S. population in 2014208 but held only 19% (104 seats) of the 114th Congress.209 Yet that was a record number twice the representation seen twenty years earlier.210 Although female political

204. Notably, they were each elected in Colorado, the first state to grant women the right to vote in state elections. First Women Elected/Appointed to State Legislative Office, WOMEN IN GOVT’;, http://www.womengovernment.org/legislate/first-women-electedappointed-state-legislative-office [https://perma.cc/56KT-AARV] (last visited Jun. 12, 2017). Crystal Bird Faucet was the first African American woman elected to a state legislature. The share of state legislators who are women has risen from 4.5% in 1971 to 24.2% in 2015. One documentary reported that countries like Cuba and Iraq have more women in the government than the United States. Miss Representation (Jan. 20, 2011); see also Women and Leadership, supra note 168.


208. Women in U.S. Congress, supra note 207.


210. Women and Leadership, supra note 168. This study conducted between November 12
representation is moving in the right direction, according to The Representation Project, “[a]t this rate, women may not achieve parity for 500 years.”

Similarly, at the state level, the share of female legislators has more than quadrupled from 4.5% in 1971 to 24.2% in 2015 but still does not accurately reflect the proportion of women in the population.

Likewise, while women have undoubtedly made significant progress in attaining entrance into the private sector, they often face obstacles to advancement once there. For example, although women account for nearly half of the labor force, as of 2014, only around 26 women (5%) served as CEOs of Fortune 500 companies; however, none served as CEOs in 1995. As of 2013, about one-in-six board members of Fortune 500 companies (17%) were women, up from 10% in 1995. That same year,
women held 52.2% of managerial and professional occupations in America, up from 30.6% in 1968. Thus, women are undoubtedly making progress, but they still lag far behind men in acquiring senior management positions. According to one survey of American businesses, “in 2014, only 22% of senior managers were women.” Furthermore, by some estimates, “women hold only 3% of clout positions in telecommunications, entertainment, publishing, and advertising.” According to some, this lack of gender diversity, particularly in media outlets, may account for portrayals of women in magazines, movies, and television that perpetuate gender stereotypes and promote inequality.

Women have also made notable gains in entering law but difficulty reaching the height of the profession. For example, in 2015, 34% of legal professionals and one-in-five law firm partners were women as were 24% of federal judges and 27% of state court judges. Only 6% of managing partners at the nation’s largest law firms were female. With regard to legal Academia, in 2008–2009, there were four times more male than female law school deans. Women held only 29% of highly coveted roles in law firm leadership.

return on invested capital, and 46% return on equity.”). Out of full disclosure, Catalyst is a non-profit organization dedicated to “expanding opportunities for women and business.”

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omen and Leadership, supra note 168.

Women in Leadership, supra note 207; see also Justin D. Levinson & Danielle Young, Implicit Gender Bias in the Legal Profession: An Empirical Study, 18 DUKE J. GENDER L. & POLY 1, 5 (2010) [hereinafter Levinson & Young, Gender Bias in the Legal Profession] (“The number of women in leadership roles in the nation’s courts and law schools is only slightly better than in the private sector. Statistics show that less than thirty percent of judges in federal and state courts are women, including federal district court judges (25%), federal appeals court judges (29%), and state court judges (26%)”) (footnotes omitted).

222. Levinson & Young, Gender Bias in the Legal Profession, supra note 221, at 4.

223. Id. at 5; see also Kristen K. Tiscione & Amy Vorenberg, Podia and Pens: Dismantling the Two-Track System for Legal Research and Writing Faculty, 31 COLUM. J. GENDER & L. 47, 51 (2015) (explaining that on average, a female legal writing professor makes 55 cents for every dollar that a male, tenured professor earns).
tenure track and tenured faculty positions. Professor Kristen Tiscione argues that many legal writing professors, who have historically been disproportionately female, are treated as a “permanent[ly] underprivileged stratum of untouchables” and “second-class citizens” in the ‘pink ghetto” in part because law schools “demean teaching legal writing as unintellectual ‘women’s work.’” She further emphasizes that as of 2014, 64% of tenured law faculty were male, while women comprised 72% of legal writing faculty. Notably, many law schools still categorically exclude legal writing professors from tenure eligibility.

Moreover, male-dominated microclimates like BigLaw, Wall Street, and Silicon Valley remain hotbeds of sex discrimination and sexual harassment. Despite this, only 28% of the 800 companies surveyed in

224. Levinson & Young, Gender Bias in the Legal Profession, supra note 221, at 5.
225. Kristen Konrad Tiscione, “Gender Degradation”: New Words to Tell an Old Story, THE SECOND DRAFT, Fall 2015, at 29, 30 (footnotes omitted).


2009 cited “achieving leadership diversity” as a top ten goal, and 40% indicated that “it wasn’t a priority at all.”

But why do these disparities persist decades after Title VII and Title IX prohibited sex discrimination in employment and education, respectively? Could gendered notions of leadership and the perceptions of female leaders to which they give rise play a role? In Gender Diversity (2000), Dr. Serena Nanda posits that in western cultures like the United States, society creates a male/female dichotomy between sex, which is biological, and gender, which is a social construct, but then fuses together the two distinct concepts. Thus, men are usually acculturated to exhibit “masculine” characteristics traditionally associated with the social construct of maleness, while women are generally socialized to display “feminine” qualities in order to be perceived as “true women.”

Individuals who challenge such characterizations and adopt characteristics more often associated with the opposite sex are known as gender variants. Their attempts, conscious or not, to breach the fused cultural template of sex and gender are often stigmatized and viewed as undesirable or threatening.

Female leaders, particularly in predominantly male domains like VMI, may be viewed as gender variants to the extent a male-gendered construct of leadership prevails therein. As a result, a female who possesses male-
gendered leadership qualities like an autocratic leadership style and who openly displays them may be viewed as a gender variant and sanctioned as a result, socially or otherwise. According to sociologist Marianne Cooper, “high-achieving women experience social backlash because their very success—and specifically the behaviors that created that success—violate[] our expectations about how women are supposed to behave.”

As will be illustrated below, the same may hold true for women who attend VMI. They may find themselves caught between a rock and a hard place—derided for being ill-suited for leadership unless they overtly conform to male-gendered notions of what it means to be a capable “cadet” and “combat leader.” Yet if they abandon traditionally feminine aspects of their identity, they are often perceived by their male counterparts as “manly,” “raging lesbians,” and more masculine than non-VMI women. Put differently, their failure to conform to hypermasculine sex stereotypes sometimes provokes resistance to their authority, while conforming may compel them to sacrifice a crucial part of their personal identity. This may explain, at least in part, why women leaders and female cadets are so often subjected to sex-based criticisms as well as sexual harassment.

a. Women in Politics

Nowhere were sex-based attacks more evident than during the 2008 election when media outlets seemingly declared open season on female candidates. One media personality told Americans that “[t]he reason [Hillary Clinton is] a U.S. senator, the reason she’s a candidate for president, the reason she may be a front-runner is her husband messes

girls with political aspirations has dropped “massive[ly].” She attributes this to the cultural climate that western media cultivates, a climate in which women are often exploited and objectified based on their appearance and where men are conditioned to be hypermasculine and in control over women. MISS REPRESENTATION (Jan. 20, 2011).


238. Id. at 413–15.

around. That’s how she got to be senator of New York… She didn’t win… on her merit.”\textsuperscript{240} Notably, his sentiments echo many respondents’ view that most women at VMI obtained rank or won awards primarily because of their sex.\textsuperscript{241} Likewise, Mark Rudov purportedly commented, “[w]hen Barack Obama speaks, men hear, ‘Take off for the future.’ And when Hillary Clinton speaks, men hear, ‘Take out the garbage.’”\textsuperscript{242} Instead of criticizing then-Senator Clinton’s platforms or policies, a TV commentator labeled Clinton “a ‘stereotypical bitch’ who would drive all men crazy after four years of listening to her ‘nagging.’”\textsuperscript{243} Similarly, a radio host remarked, “Will [this country] want to watch a woman get older before their eyes on a daily basis?”\textsuperscript{244} notably, Clinton was younger than Senator John McCain, who ultimately won the Republican nomination.\textsuperscript{245} Perhaps the best illustration of these sexist attacks occurred at a Clinton rally when obnoxious hecklers yelled “Iron my shirt” during her speech and held large

\begin{flushright}
240. \textit{Id.} at 337.
241. \textit{See infra} Appendix.
242. Parks \& Roberson, \textit{supra} note 239, at 337.

\begin{quote}
We’re with a high class prostitute. That’s what we’re with…. You’re not sittin’ there in a back alley and sayin’ hey what do you say, five bucks? No, no, no this comes to your Four Seasons hotel room and does it right. There’s nobody that’s going to look at her and say oh my gosh you’re with a whore….\end{quote}


244. Then-Senator Clinton was not the only target of Limbaugh’s jibes. When speaking of Supreme Court Justice Sonia Sotomayor, Limbaugh reportedly quipped, “I think I’m going to send Sotomayor, and her dub, a bunch of vacuum cleaners to help them clean up after their meetings.” Conte, \textit{supra} note 243.

signs saying the same. As jibes about Clinton as a wife, mother, and woman persisted, other media personalities cast her as an abrasive, domineering figure overcompensating because of her sex. According to Morvareed Salehpour, “Clinton was being criticized for the same aggressiveness and assertiveness that would have been valued in a man as a sign of a strong leader.” These attacks continued in the 2016 election when a Washington Post reporter called Clinton an “old hag.”

Emphasis on the appearance of female leaders not only comports with the all-too-frequent sexual objectification of women’s bodies in the media, but is also indicative of perceptions of women leaders as gender non-conformists who must be reminded of their proper place. Indeed, like female VMI cadets, “[f]emale candidates … face pressures to exhibit femininity while displaying the required masculine qualities.” Although prior election coverage had largely failed to dissect candidates’ appearance, in both 2008 and 2016, media outlets heavily scrutinized every aspect of Clinton’s dress and grooming. In particular, her
signature pantsuits spawned countless jokes\textsuperscript{252} and even a nutcracker, symbolic of all-too-frequent portrayals of her as a figurative “ballbuster.”\textsuperscript{253} As Salehpour notes, “[t]he media regularly used the most unflattering pictures of [Clinton] in the most awkward positions to portray her as ugly and hysterical.”\textsuperscript{254} When Clinton responded by attempting “to dress more femininely, particularly by wearing more colors and make-up that matched her clothes… the media attacked her for these attempts.”\textsuperscript{255} Notably, however, while Clinton’s appearance again took center stage in 2016, this time it prompted more mixed reactions: criticism of her fashion sense from media outlets like \textit{Elle} mobilized Clinton supporters to create Pantsuit Nation, a vocal Facebook Clinton fan club.\textsuperscript{256}

\textit{Los Angeles Times} (Sept. 21, 2010, 2:17 PM), http://www.daily-mail.co.uk/news/article-1313592/Hillary-Clinton-prepares-huge-UN-meeting-lank-locks.html (“With minimal make-up, Mrs.[.] Clinton’s 63 years came into sharp focus as she moved nearly from urging Pakistan to mend its reputation to an attempt to undermine Mr[.] Ahmadinejad within his own country.”); \textit{Daily Mail: Hillary Forgets Her Makeup}, \textit{Fox Nation} (May 7, 2012), http://nation.foxnews.com/hillary-clinton/2012/05/07/hillary-forgets-her-makeup [https://perma.cc/6V49-7YBN] (“In photos taken at events in Bangladesh and India this weekend, the Secretary of State appears tired and withdrawn—far from the well—coiffed image she has maintained over the past two decades in politics. The images - in which she is make-up free, casually dressed and wearing glasses - come as she reveals she has no desire to make another bid for the White House as she is looking for a rest.”).  

252. Comedian Jimmy Fallon commented on Chelsea Clinton’s then future child’s wardrobe: “If it’s a girl, it will get some of Chelsea’s old hand-me-downs, and if it’s a boy, it will get some of Hillary’s.” \textit{Project Runway} Mentor Tim Gunn commented on Clinton’s pantsuits: “Why must she dress that way? I think she’s confused about her gender!” Elizabeth Enochs, \textit{5 Times Hillary Clinton’s Style Was Criticized Instead of Her Ideas}, \textit{Bustle} (June 3, 2015), http://www.bustle.com/articles/86973-5-times-hillary-clintons-style-was-criticized-instead-of-her-ideas [https://perma.cc/9CDE-G52D].  


254. Salehpour, supra note 243, at 131.  


Vice-presidential nominee Sarah Palin took a different approach in 2008, “embrac[ing] her femininity and play[ing] it up, trying to use it to her advantage.” Yet she still encountered sexist critiques. Emphasizing her femininity prompted her to be sexually objectified and presumed incompetent. Republicans labeled Palin “Hot VP,” and a Huffington Post article deemed her a “VPILF,” the nickname purportedly spawned a website. A well-known Republican commentator announced that he wanted to sleep with Palin. Photographers took photos of the audience at Republican rallies through Palin’s legs making it look, intentionally or not, as if attendees were simply staring up her skirt. Comedian David Letterman quipped, “[d]uring her trip to New York, Sarah Palin bought makeup from Bloomingdale’s to update her slutty flight attendant look.”

According to Salehpour,

[while the male candidates could easily wear the same suit on multiple occasions with no one batting an eyelash, Palin did not have the same freedom . . . . If the media had not criticized her extravagant wardrobe, they would likely have criticized her poor wardrobe à la Hillary Clinton and her pantsuits.]

The media portrayals did their work well. Clinton lost a presidential...
nomination and later, the presidency. While an in-depth analysis of whether and to what extent gender played a role in the 2016 election results exceeds the scope and purpose of this Article, at least some research suggests that females may not have voted for Clinton in part because she did not “adhere to their vision of what it means to be a woman;” likewise, a University of Michigan survey noted a correlation between “hostile attitudes toward women” and voting against Clinton. Indeed, only a slight majority of female voters—54%—voted for Clinton.

Similarly, Sarah Palin also never became Vice-President, and a 2010 study concluded that she actually cost her running mate, John McCain, “just under 2% of the final vote share,” or roughly two million votes. Some have even characterized Palin’s post-election endeavors as a “plunge… from national icon to national laughingstock.”

Perhaps unsurprisingly, one post-election poll in 2008 indicated that 40% of men agreed with the statement “men are ‘naturally more suited’ to being in the Oval Office.” Other studies further confirm that sexist attacks and sexist media coverage harm women in politics. According


to Terry O’Neill, President of the National Organization for Women, headlines criticizing female candidates’ appearance send a powerful message “to all women, don’t you dare step into the public sphere, we will savage you for what you look like.”\footnote{Martha T. Moore, Focus on Hillary Clinton’s Appearance Sparks Criticism, USA TODAY (May 10, 2012) http://usatoday30.usatoday.com/news/washington/story/2012-05-09/hillary-rotham-clinton/54860282/1 [https://perma.cc/73C2-76WW].} Likewise, CEO of the Women’s Campaign Forum Foundation Sam Bennett opined, “[p]olitics remains one of the most rampant breeding grounds for misogyny.”\footnote{Sam Bennett, This Just In: The Measure of a Female Candidate Isn’t in Her Measurements, HUFFINGTON POST (Sept. 16, 2010, 11:45 AM), http://www.huffingtonpost.com/sam-bennett/this-just-in-the-measure_b_719411.html [https://perma.cc/XEF4-PWQ4].}

Notably, sexism in politics is a global phenomenon that transcends time. Political adversaries seeking to disqualify Queen Elizabeth I accused her of sexual indecency, and because some felt that she was unfit to lead the Church of England, she was deemed Supreme Governor instead of Supreme Head of the Church.\footnote{See, e.g., Judith M. Richards, Elizabeth I 53 (2012); Karen L. Nelson, Attending to Early Modern Women: Conflict and Concord 158 (2013).} When British Prime Minister Margaret Thatcher took office centuries later in 1979, she too encountered significant sexism.\footnote{Dan Amira, 10 Very Sexist Things People Said To or About Margaret Thatcher, N.Y. MAG. (Apr. 2, 2013, 12:27 PM), http://nymag.com/daily/intelligencer/2013/04/sexist-margaret-thatcher-quotes-sexism.html [https://perma.cc/V2EF-RGLX].} For instance, an opposing political party popularized the slogan “Ditch the Bitch!” and the Vice-Chairman of the same party Thatcher would one day lead purportedly remarked, “My God! The bitch has won!”\footnote{Max Fisher, ‘Ironic Lady’: How a Moscow propagandist gave Margaret Thatcher her famous nickname, THE WASH. POST (April 8, 2013), https://www.washingtonpost.com/news/worldviews/wp/2013/04/08/irony-lady-how-a-moscow-propagandist-gave-margaret-thatcher-her-famous-nickname/?utm_term=.3f6f2d8c21d [https://perma.cc/RK66-WGSK].} French President Jacques Chirac allegedly observed, “What does she want, this housewife? My balls on a tray?”\footnote{Amira, supra note 275.} Due to Thatcher’s no-nonsense leadership style, a Soviet journalist deemed her “The Iron Lady”—a nickname that stuck.\footnote{Id.} Yet a Palestinian political leader reportedly called Thatcher “The Iron Man,” while one MP supposedly nicknamed her “Attila the Hen.”\footnote{Id.} Another male MP is credited as saying, “It’s been a touching spectacle: the brave little woman getting on with the
woman’s work of trying to dominate the world.”

The same undercurrents of sexism described above persist today, undermining the authority of female leaders around the world. For example, in 2012, audience members whistled loudly at French Housing Minister Cecile Duflot during her speech at the National Assembly. South Korean presidential candidate Park Geun-hye was accused of having “no femininity” because she had no children. When Brazilian President Dilma Rousseff attended the World Cup match-up between Brazil and Colombia, her own countrymen shouted: “Hey, Dilma, go f*** yourself in the ass!” In the flurry of Twitter messages that followed the incident, one person tweeted: “468 men and 45 women in Congress and you blame Dilma for everything. How ugly is that machismo, eh?” Similarly, the media labeled former Argentinian President Christina Fernandez de Kirchner a “bitch,” “bimbo” and even “botox Evita” and “lampooned [her]... for buying Christian Louboutin shoes during a trade trip to Paris.” Similarly, Australia’s first female Prime Minister, Julia Gillard, has been accused of being “deliberately barren” and called a “non-productive old cow.” One interviewer asked Gillard if her partner was homosexual and pornographic cartoons featuring Gillard were circulated on social media. Like Thatcher’s opponents, critics of Gillard...
used sex-based slogans like “[D]itch the witch” and “[D]itch the bitch”\textsuperscript{288} and even featured “Julia Gillard Kentucky Fried Quail” on the menu at a fundraiser.\textsuperscript{289} The dish was described as having “small breasts, huge thighs and a big red box.”\textsuperscript{290}

\textit{b. Women in Business}

Similar issues plague female leaders in the private sector. Indeed, the U.S. Supreme Court first recognized sex stereotyping as a form of sex discrimination in a case involving a female accountant who was denied consideration for partnership in part because peers viewed her as too “masch.”\textsuperscript{291} Ann Hopkins was a senior manager at PricewaterhouseCooper (PWC).\textsuperscript{292} She possessed a wealth of valuable experience\textsuperscript{293} and was indisputably a strong performer, even landing a $25 million contract.\textsuperscript{294} Partners and clients praised Hopkins as an “outstanding professional” with “strong character, independence and integrity” who was “extremely competent, intelligent,” “strong and forthright, very productive, energetic and creative.”\textsuperscript{295} Indeed, the District Court concluded that Ms. Hopkins “was generally viewed as a highly competent project leader who worked long hours, pushed vigorously to meet deadlines and demanded much from the multidisciplinary staffs with which she worked.”\textsuperscript{296}

Yet PWC refused to consider Hopkins’ candidacy for partnership and

\begin{thebibliography}{9}
\bibitem{} Saner, \textit{supra} note 280.
\bibitem{} \textit{Id.} at 228–33.
\bibitem{} Price Waterhouse, 490 U.S. at 233.
\bibitem{} \textit{Id.} at 234.
\bibitem{} \textit{Id}.
later declined to revisit that decision, prompting Hopkins to sue.297 PWC claimed that Hopkins was unfit for partnership because she was perceived by some as “macho”, “overcompensat[ing] for being a woman,” “overly aggressive,” “unduly harsh,” “difficult to work with,” and “impatient with staff.”298 One partner suggested that Hopkins “take ‘a course at charm school,’” while another objected to her use of profanity “because it’s a lady using foul language.”299 In advising Hopkins on how to improve her chances of becoming partner, one PWC partner encouraged Hopkins to “walk more femininely, talk more femininely, dress more femininely, wear make-up, have her hair styled, and wear jewelry.”300

Notably, Hopkins was the only woman in the pool of partnership candidates, and social psychologist and associate professor Dr. Susan Fiske later testified that sex stereotyping likely infected PWC’s partnership selection process.301 The District Court found that past female candidates for partnership “were viewed favorably if partners believed they maintained their femin[in]ity while becoming effective professional managers” and “[t]o be identified as a ‘women’s lib[er]’ was regarded as [a] negative comment.”302 According to the District Court, “[o]ne partner repeatedly commented that he could not consider any woman seriously as a partnership candidate and believed that women were not even capable of functioning as senior managers—yet the firm took no action to discourage his comments and recorded his vote in the overall summary of the evaluations.”303

Ultimately, Hopkins prevailed. In a 6–3 decision, the U.S. Supreme Court ruled that PWC had violated Title VII by discriminating against Hopkins on the basis of sex.304 According to Justice William Brennan, “[a]n employer who objects to aggressiveness in women but whose positions require this trait places women in an intolerable and impermissible catch 22: out of a job if they behave aggressively and out of a job if they do not.”305

297. Id. at 233.
298. Id. at 235.
299. Id.
300. Id.
301. Id. 235–36.
304. Price Waterhouse, 490 U.S. at 258.
305. Id. at 251. By the time a federal district court judge awarded Hopkins a partnership and back pay a year later, she had already taken a new position at the World Bank. Ultimately,
Ann Hopkins is not the only woman to have been precluded from power on the basis of sex. In Chadwick v. Wellpoint, the First Circuit reversed the grant of summary judgment to an employer accused of failing to promote a female employee due to a sex stereotype that “women who are mothers, particularly of young children, neglect their jobs in favor of their presumed childcare responsibilities.”306 Likewise, in 2015 the Philadelphia Daily News reported that soon after Colleen Mitchell was promoted to lieutenant, becoming the highest-ranking female fireman in her station, male coworkers subjected her to sexual harassment and sex-based threats, even ejaculating on a photo album Mitchell kept inside her desk.307

Indeed, according to a recent Pew Research Center survey, 52% of female respondents opined that a major reason more women are not in top leadership positions in business is that women are held to higher standards and have to do more to prove themselves; one-third of male respondents shared this view.308 Similarly, 50% of female respondents said many businesses are not ready to hire women for these positions, compared with 35% of male respondents who believe this is a major obstacle to female leadership.309

In sum, although male-dominated spheres differ markedly, the persons populating those diverse spheres are generally products of the same androcentric culture and thus, often share strikingly similar attitudes toward women in leadership. This is true whether in the courtroom or the

308. Obstacles to Female Leadership, supra note 174.
309. Id.
classroom, on Wall Street or at VMI. Thus, it is probable that cadets enter VMI with pre-existing notions that comport with a male-gendered construct of leadership. Over time, VMI’s hypermasculine environment and institutional narrative about coeducation may impact those beliefs. Women leaders who overtly challenge those deeply engrained notions will either provoke hostility or change minds.

B. Cadet Attitudes May Reflect Continued Resistance to Coeducation and Discomfort with Gender Variance

Because VMI is a hotbed of masculinity, women who not only attend VMI but attain rank may be perceived as challenging patriarchal structures or traditions; indeed, female attempts to attain power in any male-dominated sphere will likely incite resistance or hostility. Men in hypermasculine environments like VMI tend to more rigidly enforce gender boundaries when they perceive those boundaries to be under assault. 310 By way of illustration, shortly after The Citadel admitted female students, two women withdrew under allegations of sexual harassment and hazing. 311 Likewise, our results suggest that at VMI, some men view female cadets, particularly those who attain rank, as threatening gender variants. Such cadets may manifest their hostility in various ways from microaggression to more overt sanctions, including the use of sex-based slurs, sex discrimination, and sexual harassment.

Examining student perceptions of the reasons why women attend VMI supports the conclusion that many cadets perceive women cadets as intruders or infidels, and these attitudes shape perceptions of women at VMI. Just as media outlets sexualized Sarah Palin for acting in traditionally feminine ways and simultaneously accused Margaret Thatcher and Hillary Clinton of overcompensating for their sex, many male respondents reported that women attend VMI “to prove something,” “to feel equal,” “because they are ‘manly,’” “to ‘hunt’ men,” “because they are raging lesbians,” or “to find husbands.” 312 Many of these perceptions cast female cadet’s motivations in a negative light and relate to unsubstantiated (and


312. Perdue, supra note 237, at 403.
arguably misguided) beliefs about the sexual orientation or sexual proclivities of female cadets. According to one male cadet, VMI women “realize they might look cuter with fewer girls around . . . .” Another male observed, women attend VMI because they “wanted to act like they are big and strong and wanted to dress up and play soldier.”

These perceptions, in turn, illuminate why 75.6% of male respondents did not believe that VMI should have admitted women and 82.26% believed that coeducation had negatively impacted VMI.313 Significantly, not all students agree. One cadet explained that the “most positive and overwhelmingly positive [impact] is that motivated, selfless females are given the opportunity to develop as leaders at VMI and cadets learn to work in a coed environment similar to the armed forced or professional work environment.” Other respondents observed that women attend VMI for many of the same reasons as male cadets. Yet anti-assimilation attitudes persist and may result from perceptions of female cadets as dangerous boundary crossers whose undesirable and deviant behavior warrants resistance. Yet if a male cadet does not wish to serve beside a woman, he certainly does not want to serve under her. Moreover, a male cadet who believes that women choose VMI for the “wrong” reasons may be more likely to also perceive them as categorically less fit for rank or acclaim.

In conclusion, our data revealed a microclimate in which many male cadets fiercely defend their male domain and the power and privilege it provides.314 Their animosity toward female cadets whom they perceive as invaders and infidels may be reflected in their perception of women as less well suited for and thus, less deserving of power.315 Hence, at VMI, cadet attitudes reaffirm the gendered place and status of female cadets, which in turn, makes it easier for male cadets to understand what it means to be a man at VMI and how to perform their masculinity accordingly.316 Thus, for men, defending their once-exclusive male domain both preserves their male privilege and cements their masculine identities. This is especially true with regard to female leaders who have not just infiltrated their male domain but worse yet, have been given some measure of authority over it.

313. Id. at 401–02.
314. Id. at 431.
315. Id.
316. ERVING GOFFMAN, RELATIONS IN PUBLIC: MICROSTUDIES OF THE PUBLIC ORDER (1971) (observing that when humans interact, bits of identity are encoded in that behavior and exchanged).
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C. Cadet Attitudes May Reflect the Perception of Women Leaders as Undeserving Tokens of Gender Diversity

Broader explanations that are applicable outside the unique context of VMI may provide further insight. For example, concerns regarding the selection of female leaders as mere tokens of gender diversity may account, at least in part, for our results. *Tokenism* refers to the inclusion of a person, usually a member of an underrepresented group, to symbolically represent the views or perspectives of that group.\(^{317}\) Tokens are chosen to create the illusion, albeit not the reality, of diversity, equality, and inclusion.\(^{318}\) Tokenism can be harmful because, among other things, it essentializes the experiences and attitudes of all group members.\(^{319}\) It also renders tokens more susceptible to anxiety to the extent they feel responsible to serve as spokesperson for the multitude of disparate viewpoints and concerns of an entire group (e.g., all women or all Hispanics)\(^{320}\)—an impractical and impossible task that fails to account for the intersection of various aspects of each person’s identity.\(^{321}\) Moreover, the failures of the token group member are often unfairly attributed to *all* group members.\(^{322}\) As a result, tokenism, and relatedly stereotype threat, can undermine achievement.\(^{323}\) For instance, one male executive expressed reluctance to promote a woman to a certain position “because if she fails, it will be a disaster for all women.”\(^{324}\) Yet according to Joanna Barsh, co-author of *How Remarkable Women Lead: A Breakthrough Model for Work and Life*, women must be allowed “to fail—the way plenty of male leaders are doing. It’s unfair to expect one gender to be perfect.”\(^{325}\) In reality, however, female trailblazers experience intense pressure to exceed expectations, particularly since their failures will likely be attributed,
rightly or not, to their sex.\textsuperscript{326} As female CEO Yunha Kim observed, "[i]f you are aggressive, you are a bitch. If you are emotional, you are PMSing. If you are soft, you are too feminine. Whatever way someone finds you . . . it is because you are female."\textsuperscript{327}

The impact of tokenism is perhaps most evident in student responses regarding whether female cadets attain rank or awards primarily due to sex or merit. Nearly 75\% of respondents attributed such attainments primarily to women's sex.\textsuperscript{328} According to one respondent,

[w]omen should not be given jobs or rank here just because they are women. If they are truly the best candidate then that is absolutely fine but their gender should not be taken into account. Interviews and resumes should be anonymous and gender neutral to support this . . . Otherwise the men will just continue to look at the women as hiding behind the fact that they are in fact women.

Another cadet observed that "[w]omen here are taken into rank positions, etc. regardless of their qualifications because VMI is trying to be seen as an institution of 'equal opportunity' . . . . [M]any of the Cadets in charge lack some, or all of these values." The cadet then provides a specific example of a female selected for rank even though she had been "sent to the General Committee for disrespect to the Honor Court and overall as a Rat and Cadet, has failed to uphold the VMI Standard."

Similarly, when asked to list the two most significant changes at VMI resulting from coeducation, illustrative responses included, "females have a slightly easier time achieving rank," "reverse sexism," "drop in standards," and "rank preference" for women.\textsuperscript{329} In response to the open-ended question "what is the most significant way your experience at VMI would differ if you were a member of the opposite sex, if at all?" 65 respondents observed that females had an easier time at VMI, in part because it was easier for women to attain rank.\textsuperscript{330} Unfortunately, such

\textsuperscript{326} Laws, supra note 317, at 53.


\textsuperscript{328} See infra Appendix.

\textsuperscript{329] Compare City of Richmond v. J.A. Croson Co., 488 U.S. 469 (1989), with Adarand Constructors, Inc. v. Pena, 515 U.S. 200, 241 (1995) (arguing that affirmative action "programs stamp minorities with a badge of inferiority and may cause them to develop dependencies or to adopt an attitude that they are 'entitled' to preferences").

\textsuperscript{330} Of course, this raises the important question of whether sex and gender should be
widespread assumptions may, among other things, threaten to undermine female cadet’s authority and consequently their efficacy as leaders. It may not only taint how others see them, but more importantly, how they see themselves.

D. Cadet Attitudes May Reflect Gender Polarization and Androcentrism

Undercurrents of gender polarization and androcentrism may also elucidate our results. In *The Lenses of Gender* (1993), Sandra Bem discusses three prisms through which human beings often view one another and the world: gender polarization, androcentrism, and biological essentialism. The first lens—*gender polarization*—refers to the separation of sex/gender into opposite poles representing masculine and feminine domains; westerners often use this separation to quickly process information and interpret sex and gender differences. The second lens—*androcentrism*—signifies a male-centeredness that treats men and maleness as the norm and women as “other.” Bem defines these “lenses” as “hidden assumptions about sex and gender . . . [that are] embedded in cultural discourses, social institutions, and individual psyches that invisibly and systemically reproduce male power in generation after generation.” As Bem explains, “[b]ecause society is not only gender polarizing but androcentric, the males and females living within it become androcentric and gender polarizing themselves.” As a result, we tend to construct gender identities consistent with the lenses through which we view the world. Conclusions reached as a result of viewing men and women through these lenses will likely impact the gender identity of any woman who is perceived as violating well established gender boundaries by attaining a position of authority in a male-dominated sphere. As a historically all-male military institution utilizing the masculinized
adversative educational method, VMI cadets likely viewed and perhaps still view one another through the reality-altering lenses of androcentrism and gender polarization.337 Any attempt to challenge this stronghold of masculinity would likely incite resistance.338 Not surprisingly, female cadets, particularly those who attain rank or other leadership positions, would be particularly vulnerable.

1. Gender Polarization

The existence of gender polarization339 at VMI may impact notions of leadership and perceptions of women leaders. According to Bem, “gender polarization homogenizes women and men, rather than allowing either the diversity that naturally exists within each sex or the overlap that naturally exists between the two sexes to flower in social and psychological life.”340 Furthermore, internalization of gender polarizing views may result in gender schematicity, or “the imposition of a gender-based classification on social reality, the sorting of persons, attributes, behaviors, and other things on the basis of the polarized definitions of masculinity and femininity that prevail in the culture.”341 This is perhaps best illustrated in cadet responses indicating that men, not women, typically display superior leadership ability at VMI.

As a result of gender polarization, male cadets may perceive female leaders as a threat to their masculine identities, consciously or not. By way of illustration, in Saving the Males, Michael Kimmel, recounts overhearing a VMI cadre shouting to a male cadet, “What’s wrong with you, skirt? There are women who can do more push-ups than you. When I was in the army, there was a woman who could do 100 push-ups. You can’t even do 50.”342 This suggests that to some VMI cadets, women and all things feminine represent weakness, failure, and the low bar of performance; they do not command the strength, honor, and respect required of an effective leader.

337. Perdue, supra note 237, at 421–22 (noting survey responses, which indicate the existence of gender polarization and androcentrism among respondents).
339. See BEM, supra note 1, at 41–42 (“[M]ales and male experience are treated as a neutral standard or norm for the culture or the species as a whole, and females and female experience are treated as a sex-specific deviation from that allegedly universal standard.” Put differently, male experience is the “reference point or the standard for the culture.”).
340. Id. at 193.
341. Id. at 125.
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Accordingly, hyper-masculine male cadets likely prefer a gender-polarized, male-dominated Cadre where female leaders do not challenge their masculine identities. After all, if cadets associate attributes salient to effective leadership with men and masculinity, then what does it mean to the average male cadet when a “skirt” holds rank over him?\textsuperscript{343}

2. Androcentrism

The second lens of gender—androcentrism—may further illuminate our findings. As explained above, androcentrism signifies a male-centeredness that treats men, maleness, and traditional notions of masculinity as the norm and women, womanhood, and femininity as “other.”\textsuperscript{344} Put differently, male leaders and male-gendered styles of leadership become the “reference point or the standard for the culture.”\textsuperscript{345} Significantly, “androcentrism is the lens that most often turns gender difference into male advantage and female disadvantage, [often] creating a bias toward men and against women.”\textsuperscript{346} Bem asserts that when feminine and masculine domains are gender polarized as in settings like VMI, androcentrism is likelier to exist, emphasizing gender differences, normalizing the male-gendered perspective, and “otherizing” the female-gendered perspective.\textsuperscript{347}

Throughout history, androcentrism has impacted American law.\textsuperscript{348}

\textsuperscript{343} Gender polarization and sex stereotyping likely persist in the general population as well albeit to a different extent. By way of illustration, in a 2015 Pew Center Report, most Americans (54\%) say men would do a better job running a professional sports team, while just 8\% say women would be better at this. And a 46\% plurality also gave men the edge when it comes to running a large oil or gas company. But the public is two and a half times more likely to say a woman, rather than a man, would do a better job running a major hospital or a major retail chain. Women and Leadership, supra note 168.

\textsuperscript{344} BEM, supra note 1, at 41. Our arguably androcentric English language provides several good examples. For instance, common terms like “chairman,” “fireman,” “policeman,” “classman,” “mankind,” “freshman,” and “watchman” explicitly exclude women just as “ballerina” excludes men. Androcentric language has been adopted and perpetuated throughout history. See Perdue, supra note 237, at 391–92.

\textsuperscript{345} BEM, supra note 1, at 42.

\textsuperscript{346} Perdue, supra note 237, at 392.

\textsuperscript{347} Id.

\textsuperscript{348} For example, in deciding that Illinois could deny women the right to receive a law license because of sex, the Supreme Court opined “Man is, or should be, woman’s protector and defender. The natural and proper timidity and delicacy which belongs to the female sex […] unfit it for many of the occupations of civil life.” Bradwell v. Illinois, 83 U.S. 130, 141. According to
Some scholars have even suggested that it influenced United States v. Virginia. For example, the opinion makes clear that “[i]nherent differences’ between men and women… remain cause for celebration, but not for denigration of the members of either sex or for artificial constraints on an individual’s opportunity” and that a person may be not excluded based on “fixed notions concerning the roles and abilities of males and females.” Yet as Professor Mary Ann Case observes, the decision seemingly permits VMI to require females to fit into a model designed by men for men. Indeed, the opinion states that “some women can meet the physical standards now imposed on men” and “that some women may prefer it to the methodology a women’s college might pursue.” Simultaneously, the opinion potentially undermines the value of the female-gendered leadership approach taught at VWIL, treating it, in a sense, as a less effective alternative to VMI’s male-gendered, hypermasculine adversative style. As Case points out, the opinion nowhere suggests that both male and female cadets might benefit from a pedagogical approach rooted in the significant studies conducted in designing VWIL. Instead, the Majority opinion could be construed as legitimizing VMI’s male-gendered pedagogy while marginalizing VWIL’s more female-gendered approach. Nor did the Court appear to consider that VWIL’s pedagogical style might be beneficial and attractive to male students.

Justice Joseph Bradley, “[t]he paramount destiny and mission of woman are to fulfill the noble and benign offices of wife and mother. This is the law of the Creator.” Id. at 141. See also Barber v. Barber, 62 U.S. 582 (1858) (deciding that married women have to live where their husbands choose); Pennsylvania v. Ravenel, 62 U.S. 103 (1858) (determining that women’s citizenship derives from their husbands); Kelly v. Owen, 74 U.S. 496 (1868) (same); Gridley v. Wynant, 64 U.S. 500 (1859) (concluding that a husband owns his wife’s property.


352. Virginia, 518 U.S. at 525 (quoting United States v. Virginia, 976 F.2d 890, 896 (4th Cir. 1992)).

353. Id. at 540; see also id. at 542 (“Education, to be sure, is not a ‘one size fits all’ business.”).

354. Case, supra note 110, at 348–49.

355. Id. at 363.

356. Id. at 366; see also Dr. Lesley Novack & Dr. David Novack, Gendered Views on Coeducation at a Military College: The Impact of Gender Polarization (on file with author).
In light of this, cadets may be likelier to associate male-gendered qualities with strong leadership, and as a result, female cadets, particularly those in leadership, likely feel significant pressure to display traditionally masculine traits and behaviors in order to be accepted. Indeed, West Point issued a press release in 1979 stating, “[female cadets here adopt traditional masculine personality traits to be accepted as leaders.” \(^{357}\) Likewise, in our VMI survey, nearly 75% of male respondents agreed that “female students who attend VMI are typically more masculine than most women I know.” \(^{358}\) Notably, 34.25% of male respondents believed that female cadets should be “gender neutral”, and 32.65% of female respondents agreed. \(^{359}\) Another 20.2% of male cadets believed that female cadets should be “somewhat not feminine” or “not feminine,” and 10.2% of women agreed. \(^{360}\) Only 6.85% of men and 8.16% of women believed that female cadets should be “very feminine.” \(^{361}\) Although many female cadets experience intense pressure to suppress or minimize their feminine gender identities, \(^{362}\) female cadets in leadership likely experience it even more keenly since they pose a double threat to their male counterparts, particularly male subordinates.

Yet this pressure places women leaders at VMI and elsewhere, in a difficult Catch-22: if they perform their sex in traditionally feminine ways, they risk not being taken seriously and instead being perceived as weak, “soft,” unqualified, incompetent, or as a sex object. As noted earlier, their personal failures will likely be ascribed to all women leaders and attributed to their sex. For example, when Sarah Palin expressed her femininity in traditional ways, she was effectively deemed an incompetent pageant queen unfit for the Oval Office. \(^{363}\) On the other hand, if a woman suppresses her female-gendered identity or expresses herself in traditionally masculine ways, even as benign as choosing to wear pants like Hillary Clinton or refusing to wear makeup like Ann Hopkins, then she is accused of overcompensating for being a woman, as if her sex is a weakness that requires redress. \(^{364}\) For instance, Margaret Thatcher was

\(^{357}\) Kimmel, supra note 35, at 506.
\(^{358}\) Perdue, supra note 237, at 421.
\(^{359}\) Id. at 423.
\(^{360}\) Id.
\(^{361}\) Id.
\(^{362}\) Id. at 424.
\(^{363}\) Salehpour, supra note 243, at 137–38; Erbe, supra note 261.
\(^{364}\) See supra note 256 and accompanying text.
deemed “The Iron Man” due to her no-nonsense approach to leadership; her show of strength, decisiveness, and resolve subjected her to sex-based mockery and criticism.365 Similarly, Clinton earned the ire of many simply because she wore pants and was viewed as a figurative “nutcracker.”366 Likewise, Hopkins was told to “wear makeup” and “take a course in charm school” in order to increase her odds of becoming a partner at PWC—this after she had landed a $25 million contract and amassed over a decade of relevant work experience.367 Female cadets experience the same pressures daily; they are often derided for traditional displays of femininity but depicted as “manly” and “raging lesbians” without them.

In recognition of this longstanding Catch-22, Facebook COO and author of Lean In: Women, Work, and the Will to Lead, Sheryl Sandberg, recently launched the Ban Bossy campaign.368 According to the campaign’s website, peers often brand assertive young girls as “bossy,” which may discourage them from later seeking leadership positions.369 The website references research indicating that “[b]etween elementary school and high school, girls’ self-esteem drops 3.5 times more than boys” and “[g]irls are twice as likely as boys to worry that leadership roles will make them seem ‘bossy.’”370 In class, girls are usually called on less and more frequently interrupted.371 Rachel Simmons, Co-Founder of the Girls Leadership Institute, advises girls to cultivate effective leadership skills by, inter alia, speaking in class, not making themselves seem small or unconfident by speaking quietly or apologizing before they speak, seeking out strong role models and mentors, holding group members accountable for performing an equal share of group work, and pushing themselves beyond their comfort zones instead of constantly worrying about what others will think

365. Amira, supra note 274.
366. The Hillary Nutcracker, supra note 253.
368. See Ban Bossy, BAN BOSSY, http://banbossy.com/ [https://perma.cc/22U8-U2(IN] (last visited Jun. 12, 2017). According to the campaign’s website, When a little boy asserts himself, he’s called a “leader.” Yet when a little girl does the same, she risks being branded “bossy.” Words like bossy send a message: don’t raise your hand or speak up. By middle school, girls are less interested in leading than boys—a trend that continues into adulthood. Together we can encourage girls to lead.
369. Id.
371. Id.
of them.\textsuperscript{372}

Critics of the \textit{Ban Bossy} initiative argue, \textit{inter alia}, that androcentrism, gender polarization, and sex stereotypes no longer serve as barriers to female success; even if people possesses those views, there is no evidence to show that they regularly act upon them to discriminate against women or undermine female leaders.\textsuperscript{373} Yet according to sociologist Michael Kimmel, “[p]rivilege is invisible to those who have it.”\textsuperscript{374} Similarly, individuals who view one another through the lens of androcentrism are unable to see how androcentrism impacts their view and, as a result, how these lenses may impede women’s advancement.\textsuperscript{375} In light of this, it is unsurprising that many Americans do not believe that lack of toughness or management skills prevent women from reaching top executive positions.\textsuperscript{376} Similarly, at VMI, many respondents believed that it was easier for women to obtain admission, scholarships, awards, and rank, that female cadets were held to lower standards in many respects, and that most women attained rank primarily due to sex.

F. Cadet Attitudes May Reflect Sex Stereotyping

Sex and gender stereotypes may also account for our findings just as they played a prominent role in \textit{United States v. Virginia}. Research reveals that stereotypes are not only prevalent but sometimes also self-fulfilling.\textsuperscript{377} Humans often use stereotypes, consciously or not, to
Thus, stereotypes are in a sense a mental shortcut that enables us to quickly process information. According to Levinson and Young, “[i]n the context of gender stereotypes, children are likely to learn at an early age that men are ‘competent, rational, assertive, independent, objective, and self confident,’ and women are ‘emotional, submissive dependent, tactful, and gentle.” They further observe, “If we immediately picture a man when we think about a trial lawyer, for example, what might that mean for women seeking to reach the pinnacle of the [legal] profession?” The question is apt for VMI cadets as well, assuming that society generally pictures a male when asked to imagine a VMI cadet. Thus, stereotypes can undermine the development and success of female leaders. Indeed, according to LeanIn.Org President and Co-Founder Rachel Thomas:

Men are expected to be assertive, confident, and opinionated, so we welcome their leadership. In contrast, women are expected to be kind, nurturing, and compassionate, so when they lead, they are going against our expectations. A man who makes a tough decision at
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work is often seen as decisive, while a woman who does the same may be seen as impulsive and brash.382

Such sex stereotyping legitimates male power while potentially disadvantaging women. For example, one study found that simply inserting a man’s name on a woman’s resume increases her “worthiness of hire” by 60%.383 Another study revealed that women who are more “likeable” because they are viewed as helpful or friendly are less likely to also be perceived as competent; yet, women are more likely to be sanctioned for self-promoting or being direct.384 Research further indicates that women usually speak less but are interrupted more at meetings, the same phenomenon that often plagues young girls in the classroom.385 As a result, women may often wield less influence than their male counterparts; indeed, men are also likelier to sit in the front and center at meetings, while women often sit at the edges of the table.386 As observed in PWC’s selection process, women are also often evaluated more harshly than men or using criteria unrelated to the position.387 Women are likelier to attribute success to external factors, while men usually internalize success, taking full or primary credit for their accomplishments; as an indirect result, women are often given less credit than men for their role in group accomplishments.388 Women also generally undervalue their skills and competency and perhaps as a result,


are less likely to ask to handle a high-stakes matters or new opportunity—the kind of initiative and risk-taking that often leads to promotions and advancement.\textsuperscript{389} Women are also more susceptible to self-doubt and the feeling that they are frauds who do not belong in the position, a phenomenon oft-described as “imposter syndrome.”\textsuperscript{390} In fact, one study found that women typically will not apply for a job unless they meet 100% of the application criteria, while men will apply if they meet only 60% of the criteria.\textsuperscript{391} Predictably, women, on average, earn less than men even when one accounts for the difference in hours worked.\textsuperscript{392} Indeed, one study recently found that women earn approximately 82 cents per dollar earned by their male counterparts.\textsuperscript{393} Perhaps because women are expected to be more community-oriented and collaborative, employers often react negatively when women self-promote or advocate for themselves, such as by asking for a promotion or a raise.\textsuperscript{394} Women also


frequently have more difficulty finding valuable mentors. Yet research indicates that people who negotiate are typically promoted on average seventeen months earlier than those who do not; thus, penalizing women for self-promotion and advocacy only further exacerbates the gender disparity of women in leadership positions. Furthermore, two-thirds of women at Fortune 200 companies serve in the kinds of support roles that are less likely to culminate in senior leadership positions. Women also generally accept more service work, which is often undervalued in the promotion process. Another study noted that “when women are asked a favor at work, they earn almost no social capital for saying yes and are penalized for declining. Men, on the other hand, gain points for saying yes and face minimal fallout for saying no.”

Awareness of the harmful impact of stereotyping has played a pivotal role in equal rights jurisprudence. For example, in Mississippi University for Women v. Hogan, Justice Sandra Day O’Connor stated:

[...] the test for determining the validity of a gender-based classification... must be applied free of fixed notions concerning the roles and abilities of males and females. Care must be taken in ascertaining whether the statutory objective itself reflects archaic and stereotypic notions. Thus, if the statutory objective is to exclude or “protect” members of one gender because they are presumed to suffer from an inherent handicap or to be innately inferior, the objective itself is illegitimate.

Thus, the Supreme Court concluded that because the nursing school’s admission policies were not substantially related to an important objective, the Court need not resolve whether sex classifications are


399. Leadership Tips for Managers, supra note 382.

400. Strum, supra note 9, at 77.
inherently suspect.\textsuperscript{401} “The whole lesson of gender discrimination cases in the 1970s and 1980s had been that rights inhered in the individual, who did not necessarily conform to ‘average’ abilities and propensities.”\textsuperscript{402} Similarly, in \textit{United States v. Virginia}, Justice Ginsburg made clear “[s]tate actors . . . may not exclude qualified individuals based on ‘fixed notions concerning the roles and abilities of males and females.’”\textsuperscript{403} She further observed, “[t]he notion that admission of women would downgrade VMI’s stature, destroy the adversative system and, with it, even the school, is a judgment hardly proved, a prediction hardly different from other ‘self-fulfilling prophecies’ once routinely used to deny rights [and] opportunities.”\textsuperscript{404}

Research reveals that stereotypes can undermine performance, fueling the self-fulfilling prophecy to which Justice Ginsburg referred.\textsuperscript{405} \textit{Stereotype threat} occurs when a person believes that he or she may confirm negative stereotypes about a group to which he or she belongs.\textsuperscript{406} Research reveals that stereotype threat may cause an individual to underperform. By way of illustration, Joshua Aronson and Claude Steele (1995) performed a study, which found that African American students performed comparably with white students when told they were taking a test involving “a laboratory problem-solving task.”\textsuperscript{407} However, when another group was instructed that the exact same test would instead measure intellectual ability, the African American students underperformed.\textsuperscript{408} Likewise, a group of white male math and engineering majors performed less well on a math test than their Asian counterparts

\begin{enumerate}
\item \textit{Id.}
\item \textit{Id.} at 184.
\item \textit{Id.} at 542–43 (internal citation omitted); see also \textit{Id.} at 550 (“[G]eneralizations about ‘the way women are,’ estimates of what is appropriate for \textit{most women}, no longer justify denying opportunity to women whose talent and capacity place them outside the average description.”).
\item \textit{Stereotype Threat and the Intellectual Test Performance of African Americans}, 69 J. \textit{Personality \& Soc. Psychol.} 797, 797 (1995) (“Stereotype threat is being at risk of confirming, as self-characteristic, a negative stereotype about one’s group.”).
\item \textit{Id.} at 799–800.
\item \textit{Id.} at 797, 802.
\end{enumerate}
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when they were instructed that the test aimed to investigate “why Asians appear to outperform other students on tests of math ability.” Similarly, female high school students did less well on a test of spatial skills when advised that males are better at solving spatial problems due to inherent genetic differences between the sexes. Taken together, these studies indicate that widespread narratives regarding female cadets being ill-suited for positions of leadership may discourage them from attempting to obtain these positions and perhaps even adversely impact their performance thereof. In short, female cadets may buy into the stereotypes without even realizing it; their lack of self-confidence may undermine their authority or as will be discussed below, prompt them to overcompensate for the female-gendered qualities they have been acculturated to perceive as weaknesses.

VMI’s hypermasculine, somewhat hostile environment may also impede women’s efficacy as leaders. In a study conducted in Chicago’s crime-ridden South Side, students who lived in areas where a homicide had recently occurred “scored half a deviation lower on a test of intelligence.” This may indicate that a person’s environment, particularly high-stress, anxiety-creating settings, can adversely impact performance. Given the high-stress, hellish nature of the Ratline, one could assume that pervasive opposition to coeducation may create an environment that would impede the leadership efficacy of any female cadet, particularly one struggling to gain the respect of her peers.

G. Cadet Attitudes May Reflect Reactions to Gender Coping Strategies

As noted earlier, to gain respect and acceptance from peers, female

410. Id.
412. Paul, supra note 409.
leaders may deploy gender coping strategies, or “ways of doing gender.”\textsuperscript{413} One such strategy—\textit{emphatic sameness}—involves “downplaying gender identity as women [as well as female solidarity] in favor of being seen as cadets.”\textsuperscript{414} For example, female rats rejected the term “sister rats,” and some even voluntarily shaved their heads, although VMI did not require it.\textsuperscript{415} Another strategy—\textit{strategic overcompensation}—\textsuperscript{416} occurs when members of the dominant group—here, men—are presumed to be competent until proven otherwise, while members of an underrepresented group—women—feel that they must constantly demonstrate their competence to earn others’ respect.\textsuperscript{417} In other words, female cadets who feel “otherized” due to their sex or gender may actively dissociate themselves from all things feminine to be regarded as “one of the guys.” As one West Point graduate explained, “[o]nce I was accepted as ‘not one of those women’ then I was O.K.”\textsuperscript{418} According to Major Sherrise Powers, “The women [at VMI] feel that they have to do the very same things [as the men], to the point that they will acquire language that they would not normally use; they will start spitting on the stoop…. I’ve got to be one of the guys.”\textsuperscript{419} In a sense, women “blend” in to gain social acceptance as well as to cope with difference anxiety.\textsuperscript{420}

Emphatic sameness and strategic overcompensation are not uncommon, for women leaders in in male-dominated spheres.\textsuperscript{421} Such women, including female cadets, may downplay their gender identities as

\textsuperscript{413} Kimmel, supra note 35, at 505.

\textsuperscript{414} Id.

\textsuperscript{415} See Brodie, supra note 4, at 220–22.

\textsuperscript{416} Kimmel, supra note 35, at 505.

\textsuperscript{417} BEM, supra note 1, at 158; Gabriella Gutiérrez et al., Presumed Incompetent: The Intersections of Race and Class for Women in Academia 8 (2012).

\textsuperscript{418} Id.

\textsuperscript{419} Brodie, supra note 4, at 286–87.

\textsuperscript{420} See Kimberlyn Leary, Passing, Posing, and “Keeping it Real”, 6 Constellations 85, 85 (1999).

well in order to emphasize their intelligence and be taken seriously. They may intentionally adopt traditionally masculine traits, dress, and behaviors, such as increased use of profanity, binding breasts, or refusing to wear jewelry, makeup, or perfume, to minimize perceived gender difference.\textsuperscript{422} For example, in a study of female science majors, one woman observed that she wore pants to the lab instead of a skirt in an attempt “to make herself appear more ‘masculine,’ or at least more ‘androgynous’ and thus purchase[] (literally) her credibility as a scientist.”\textsuperscript{423}

Likewise, female cadets at VMI also took great strides to differentiate themselves from VWIL and to deemphasize traditionally feminine dress, appearance, and behaviors.\textsuperscript{424} Like Clinton and Palin, the women of VWIL and VMI exhibited “contrasting styles of femininity” most evident when they took ROTC classes side by side. Some VMI women resented that VWIL women embraced traditional femininity, wearing makeup, jewelry, and varying lengths of hair.\textsuperscript{425}

A similar phenomenon can still be readily observed in other male-dominated spheres where women are sometimes unwittingly pitted against one another, vying for acceptance. Benenson et al (2011) concluded that when women believe that they are at risk of being socially excluded, their first reaction is to exclude a third party.\textsuperscript{426} Crick and Bigbee (1998) found that women are likelier both to engage in and become victims of such relational aggression.\textsuperscript{427} According to psychologist Seth Meyers, “[i]ndependent of what the research shows, it’s understandable on a common-sense level if women feel that they must work hard to secure whatever social power they can, and this may sometimes take the form of exclusionary practices with other women.”\textsuperscript{428} Similarly, Brodie observes that at VMI, “[e]very female cadet had to earn her place separately, and this

\textsuperscript{422} See, e.g., BRODIE, supra note 4, at 286–87; Leary, supra note 420, at 85.

\textsuperscript{423} Maria Ong, Body Projects of Young Women of Color in Physics: Intersections of Gender, Race, and Science, 52 SOC. PROBS. 593, 605 (2005).

\textsuperscript{424} According to Kimmel, “[t]he United States Military Academy … offered its first women a class in how to apply and wear makeup.” Kimmel, supra note 35, at 506.

\textsuperscript{425} BRODIE, supra note 4, at 296.


\textsuperscript{427} Id.

\textsuperscript{428} Id.
sort of pressure was not conducive to group bonding."429 Indeed, VMI women showed no special allegiance to other women.430 Cadets from VWIL and VMI often refused to sit together.431 Female rats also snubbed the female exchange students brought in to serve as role models and refused to call them "ma'am."432

In conclusion, deployment of these coping strategies may allow otherized female leaders to more easily evade their stigmatized status.433 Yet opting for androgyne or masculinity may require them to sacrifice a vital part of who they are. The pressure women experience to be more masculine in order to be perceived as a deserving cadet and capable leader may further explain why roughly 75% of male cadets view female cadets as more masculine than non-VMI women.434 As one female cadet explained, "I don't know whether I want to be feminine for the outside world, or whether I want to be tough for VMI. I don't know which world I need to live up to... There's no middle, either."435 Notably, the cadet's response implicitly assumes that femininity and toughness cannot be synonymous. Female politicians, attorneys, and CEOs who are often accused of lacking femininity may likely feel the same way.436

H. Cadet Attitudes May Reflect Implicit Gender Bias

Implicit gender bias could also explain our findings. "The vast and growing body of research on implicit437 social cognition suggests that

429. BRODE, supra note 4, at 294.
430. Id.
431. Id.
432. Id. at 299–300, 303.
433. See generally GOFFMAN, supra note 316.
434. Id. at 423.
435. BRODE, supra note 4, at 291.
436. See, e.g., Niko Bowie, Hillary: An Ideal of Masculine Hegemony, YALE NEWS (Feb. 1, 2009) ("Hillary's dominant message of 'experience' is also based in a conventional and often gendered understanding of leadership... Much of this might be a strategic move by Hillary to convince voters, swept up in the president-as-patriarch mentality, that a woman can do a man's job... Yet as someone who obviously does not want to compartmentalize the identity of women to their maternal and marital relationships, Hillary has been remarkably brazen in her willingness to play up the traditionally feminine roles of wife and mother... [It] loses some of its freshness when the candidate simultaneously embraces the White House's image of masculine hegemony... [H]er election, unfortunately, would likely be more of a symbolic victory for women than a substantive win for women's issues. The glass ceiling, in other words, would be broken, but only by a woman who governs like a man.").
437. Herein, "implicit" connotes a lack of explicit or express access to memory, perception, attitudes, and the like. See Abigail L. Perdue & Gregory S. Parks, The Nth Decree: Examining the
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individuals lack absolute awareness of their own thoughts” and thus, may be less in control of the ensuing behavior that results from such thoughts.438 Such mental processes include implicit attitudes439 and implicit stereotypes,440 which could differ markedly from the person’s explicit attitude about an individual, category, or thing.441 Such mental dissociations are particularly prevalent in attitudes toward stigmatized groups, such as female leaders at VM1.442

Taken together, implicit attitudes and stereotypes may, in turn, give rise to implicit bias, or an unconscious bias for or against a particular person, group, or category. Implicit bias may provoke in-group favoritism and out-group discrimination,443 or an unconscious bias against members of one’s own group.444 By way of illustration, shooter bias studies indicate that both African American and Caucasian participants are likelier to shoot an unarmed African American target and refrain from shooting a Caucasian armed target.445 Likewise, courts have long recognized that members of a group could discriminate against other members of the same group446 and more recently, have appeared willing to at least consider evidence of implicit bias to assess whether unlawful discrimination has


439. Implicit attitudes have been defined as “introspectively unidentified (or inaccurately identified) traces of past experience that mediate favorable or unfavorable feeling, thought, or action toward social objects.” Anthony G. Greenwald, Debbie R. McGhee & Jordan L. K. Schwartz, Measuring Individual Differences in Implicit Cognition: The Implicit Association Test, 74 J. Personality & Soc. Psychol. 1464, 1464 n.1 (1998).


441. Id.

442. Id. at 93.


444. Perdue & Parks, supra note 437, at 102.


446. See, e.g., Oncale v. Sundowner Offshore Servs., Inc., 523 U.S. 75, 79–80 (1998) (recognizing same-sex sexual harassment as actionable under Title VII); Castaneda v. Partida, 430 U.S. 482 (1977); Ross v. Douglas Cty., 234 F.3d 391, 396 (8th Cir. 2000) (“[W]e have no doubt that, as a matter of law, a black male could discriminate against another black male ‘because of such individual’s race.’”).
occurred.\textsuperscript{447} As the Supreme Court has explained, “Because of the many facets of human motivation, it would be unwise to presume as a matter of law that human beings of one definable group will not discriminate against other members of their group.”\textsuperscript{448} Implicit bias may manifest itself in the form of overt discrimination\textsuperscript{449} or as microinsults,\textsuperscript{450} microinvalidation,\textsuperscript{451}

\textsuperscript{447} See, e.g., Thomas v. Eastman Kodak Co., 183 F.3d 38, 42 (1st Cir. 1999) (“Title VII’s prohibition against ‘disparate treatment because of race’ extends both to employer acts based on conscious racial animus and to employer decisions that are based on stereotyped thinking or other forms of less conscious bias.”); Watson v. Fort Worth Bank & Trust, 487 U.S. 977, 990 (1988) (in justifying its disparate impact analysis, the Supreme Court explained, “even if one assumed that any such discrimination can be adequately policed through disparate treatment analysis, the problem of subconscious stereotypes and prejudices would remain.”); Pippen v. State, 854 N.W.2d 1, 6 (Iowa 2014), \textit{reh’g denied} (Oct. 13, 2014) (permitting implicit bias expert Dr. Anthony Greenwald to testify about implicit race bias in a race discrimination class action filed in Iowa State Court against all Iowa executive agencies). \textit{But see} Wal-Mart Stores, Inc. v. Dukes, 564 U.S. 338 (2011) (rejecting testimony of commonality by social scientist Dr. William Bielby who argued that bias infested the decision-making process).

\textsuperscript{448} Castaneda, 430 U.S. at 499.

\textsuperscript{449} Justin D. Levinson, Huajian Cai, & Danielle Young, \textit{Guilty by Implicit Racial Bias: The Guilty/Not Guilty Implicit Association Test}, 8 OHIO ST. J. CRIM. L. 187 (2010) (researchers created a Guilty/Not Guilty IAT that tested whether people associate African Americans with criminal guilt and the results found that people implicitly associate African Americans (compared to white people) with guilt and that people’s levels of implicit bias predicted the way they evaluated evidence in a criminal trial); see also Jeffrey J. Rachlinski et al., \textit{Does Unconscious Racial Bias Affect Trial Judges?}, 84 NOTRE DAME L. REV. 1195, 1199 (2009); John F. Dovidio, Samuel L. Gaertner & Kerry Kawakami, \textit{Implicit and Explicit Prejudice and Interracial Interaction}, 82 J. PERSONALITY & SOC. PSYCHOL. 62, 65–67 (2002) (revealing that individuals with a strong implicit bias on the White/Black IAT may exhibit different behavior toward African Americans than those who do not possess as strong of a bias); Laurie A. Rudman & Richard D. Ashmore, \textit{Discrimination and the Implicit Association Test}, 10 GROUP PROCESSES & INTERGROUP REL. 359, 361–65 (2007) (suggesting that a person’s IAT score may be predictive of the person’s discriminatory behavior, such as using racial slurs).

\textsuperscript{450} A microinsult is a comment, perhaps intended as compliment, that insults the recipient. By way of illustration, a microinsult might occur if a softball coach told a female player, “You’d never guess you were a girl by the way you pitch.” While likely well-intentioned, the remark sends a message that women usually do not pitch well and that the female player deserves praise because she meets the male standard of pitching.

\textsuperscript{451} With regard to implicit bias based on sex or gender, microvalidation refers to portrayals of women that are untrue, unflattering, or tell only part of the story as well as the complete omission of women. For example, scientist Rosalind Franklin was an English chemist and crystallographer whose work on X-ray diffraction images of DNA led Francis Crick, James Watson, and Maurice Wilkins to eventually discover DNA’s structure—the double helix. Yet while Watson and Crick’s widely celebrated accomplishments made household names, Franklin’s contributions have historically been overlooked in science books and courses. Jane J. Lee, \textit{Women Scientists Who Were Snubbed Due to Sexism}, NAT’L GEOGRAPHIC (May 9, 2013), http://news.nationalgeographic.com/news/2013/13/130519-women-scientists-overlooked-dna-history-science/ [https://www.nationalgeographic.com/news/2013/13/130519-women-scientists-overlooked-dna-history-science/] ("Like many women scientists, Franklin was robbed of recognition throughout her career . . . . Over the centuries, female researchers..."
or microaggression, which, while unintentional and often unconscious, are still harmful. Implicit bias, albeit unconscious, may explain why so many female respondents associate traits most salient to effective leadership with men, believe that women usually attain rank at VMI due to sex, and do not mind having a male supervisor.

Implicit attitudes are most often measured using the Implicit Association Test ("IAT"), which requires participants to press two designated keys as quickly as possible after seeing certain words or images on the computer monitor, and the words or images are grouped into meaningful categories, such as “male” or “female.” It then measures implicit association by calculating how quickly and how accurately the participant completes the categorization task, operating on the assumption that more errors and slower reaction time indicate the strength of the association. Put differently, a participant with a stronger association between the words “male” and “leader” would either have a slower reaction time when asked to group “female” with “leader” or would commit an error when attempting to do so. Notably, however, Professors Gregory Mitchell and Philip Tetlock contend that implicit bias

have had to work as ‘volunteer’ faculty members, seen credit for significant discoveries they’ve made assigned to male colleagues, and been written out of textbooks.”).

452. See, e.g., Mitchell & Tetlock, supra note 437, at 1051; Levinson, Cai & Young, supra note 449, at 193 (microaggressions describe subtle forms of bias and discrimination experienced by members of marginalized groups).

453. Devah Pager, The Mark of a Criminal Record, 108 AM. J. SOCIOLOGY 937, 959 (2003) (stating that the negative effect of having a criminal record is 40% greater for African American than white person); see also Leadership Tips for Managers, supra note 382.


455. Anthony G. Greenwald, Mahzarin R. Banaji & Brian A. Nosek, Understanding and Using the Implicit Association Test: I. An Improved Scoring Algorithm, 85 J. PERSONALITY & SOC. PSYCHOL. 197 (2003); Levinson & Young, Gender Bias in the Legal Profession, supra note 221, at 20.

456. Levinson & Young, Gender Bias in the Legal Profession, supra note 221, at 19.

457. The Gender/Science IAT

[Re]quires participants to group together male and female photos with science and liberal arts words. It consistently shows that people associate men with science and women with liberal arts. It is worth noting the flexibility of the IAT to test either evaluative dimension words (such as grouping Male/Female with Good/Bad), or attribute dimension words (such as grouping Male/Female with Career/Family).

Id. at 20.
"[r]esearchers jump the inferential gun in labeling measures of implicit associations measures of unconscious propensity to discriminate. . . until empirical studies link specific ranges of scores to specific acts that objectively . . . represent discrimination."\textsuperscript{458}

While not without its critics, implicit bias research may still shed light on our findings. For example, in 2010, Justin Levinson and Danielle Young conducted an empirical study that would first measure the implicit association between men and judges and women and paralegals as well as between men and the workplace and women and home.\textsuperscript{459} After assessing implicit gender bias, Levinson and Young then tested whether gender stereotypes predicated biased decision-making by asking participants to select a candidate for hire, to rank the desirably of masculine and feminine traits in appellate judges, and finally, to reallocate a law school's budget for student organizations due to budget cuts.\textsuperscript{460} Levinson and Young found that a diverse group of both male and female law students implicitly associated judges with men, not women, and also associated women with the home and family . . . implicit gender biases were pervasive . . . [T]he more strongly male participants associated judges with men in the Judge/Gender IAT, the more they preferred that appellate judges possess masculine (compared to feminine) characteristics . . . demonstrating that implicit gender biases can affect decision-making.\textsuperscript{462}

\textsuperscript{458} Mitchell & Tetlock, supra note 437, at 1030–32. Elsewhere Mitchell and Tetlock note that "[t]he IAT is an arbitrary metric that sorts people along a dimension—reaction time—that looks objective but lacks any objective connections to legally actionable behavior." \textit{id.} at 1032. "Researchers ignore alternative explanations for alleged discriminatory behavior that conflict with the implicit-prejudice hypothesis. . . . Their studies] rarely control for a variety of confounding factors that could explain the pattern of results without assuming implicit prejudice or stereotypes at work." \textit{id.} at 1032–33. "The IAT has serious . . . flaws and an alarmingly high false alarm rate. . . . A host of factors other than association strength can affect reaction time [such as] . . . evaluation apprehension." \textit{id.} at 1033. Finally, studies fail to "establish that the correlations between IAT scores and discriminatory conduct found in artificial laboratory settings reliably predict behavior in real-world settings that often have institutionalized layers of safeguards against the expression of prejudice." \textit{id.}

\textsuperscript{459} Levinson & Young, \textit{Gender Bias in the Legal Profession, supra} note 221, at 2–3.

\textsuperscript{460} \textit{id.} at 3.

\textsuperscript{461} \textit{id.} Specifically, "the more implicit bias the participants displayed linking judges to males, the more they preferred masculine judge attributes" and "the more implicit bias male participants displayed linking men to career, the more they preferred feminine judge attributes." \textit{id.} at 30.

\textsuperscript{462} \textit{id.} at 3.
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Notably, however, the same individuals who possessed an implicit gender bias were still capable of making gender-neutral decisions. Specifically, “for the resume study, male law student participants even preferred female candidates to male candidates and held other pro-female job attitudes ... [and] law student participants were no more likely to cut funds from a women’s organization than from other organizations.”

According to Levinson and Young, their results “highlight two conflicting sides of the ongoing gender debate: first, that the power of implicit gender biases persists ... [but] the emergence of a new generation of egalitarian law students may offer some hope for the future.”

Although our VMI survey did not measure the implicit gender bias of respondents, our results may suggest that powerful sex stereotypes, both explicit and implicit, conscious and unconscious, persist in settings that, while quite distinct from VMI, remain male-dominated. Thus, while VMI is a unique environment that attracts a special type of individual, the associations observed among our respondents mirror those observed among the respondents in Levinson and Young's study—students at a non-military institution that has been coeducational for decades.

In light of this, our results are somewhat unsurprising. First, VMI's hyper-masculine culture may foster an implicit, even unconscious, attitudinal preference for all things masculine. Thus, solidarity with other males, most of whom oppose coeducation, may trump support for women, particularly female leaders. Even in the absence of an implicit attitudinal

463. Id. at 3–4. Specifically, “male participants hired Ashley more (N=17) than female participants (N=14), while female participants hired David more (N=12) than male participants (N=7).” Id. at 31.
464. Id. at 4.
465. Id. at 4.
466. Id.
467. Id.
preference, a cadet’s explicit attitudes toward a female leader may be distinct from his implicit attitudes toward the opposite sex. Cadets may experience an implicit attitudinal preference for the attitudes of the dominant in-group around which VMI’s culture revolves—male cadets. As a natural byproduct of that preference, cadets may, consciously or not, adopt the attitudes and behaviors of prototypical male cadets, including perceptions that men are superior leaders and that women attain rank largely due to their sex.

Use of demeaning sex-based slurs, such as “shemet,” as well as widespread, well-known opposition to coeducation could further impact perceptions of women in leadership.\textsuperscript{469} By way of illustration, social psychologists Jeff Greenberg and Tom Pyszczynski asked African American and white college students to judge a debate but planted audience members who, immediately after the debate, either referred to the African American students as the N-word, criticized them in a non-racial manner, or said nothing. Observers who overheard the slur were likelier to lower their evaluation of the African American debaters. This suggests that racial slurs “can indeed cue prejudiced behavior in those who are exposed.”\textsuperscript{470}

In another study, Mahzarin Banaji and her colleagues (1993) exposed participants to phrases related to the female stereotype of dependence (\textit{e.g.}, phrases like “never leaves home”).\textsuperscript{471} They predicted that mere exposure to such phrases would trigger other female stereotypes that would impact participants’ subsequent evaluation of women’s behaviors.\textsuperscript{472} Banaji, Hardin and Rothman told participants that they were beginning an unrelated study and then asked participants to read short

\textsuperscript{469} Female cadets are predictably in favor of coeducation (82.3%), but even two decades after the onset of United States. v. Virginia, most male cadets still oppose it (75.6%), with over half being strongly opposed. Perdue, \textit{supra} note 237, at 401.

\textsuperscript{470} RANDALL KEN NEDY, NIGGER: THE STRANGE CAREER OF A TROUBLESOME WORD 60 (2002).

\textsuperscript{471} Mahzarin R. Banaji, Curtis Hardin & Alexander J. Rothman, \textit{Implicit Stereotyping in Person Judgment}, 65 J. PERSONALITY & SOC. PSYCHOL. 272, 274 (1993). Other participants were exposed to phrases related to the male stereotype of aggression (\textit{e.g.}, “threatens other people”). Id. Participants in the control conditions were exposed to neutral phrases (\textit{e.g.} “crossed the street”). \textit{Id.} See also Jerry Kang et al., \textit{Are Ideal Litigators White? Measuring the Myth of Colorblindness}, 7 J. EMPIRICAL LEGAL STUD. 886, 886–915 (2010) (researchers created an IAT to examine whether jurors’ implicit ethnic biases might impact how they evaluate Asian male lawyers versus white male lawyers in a mock trial. The results indicated that participants were likely to implicitly associate white males with traits more commonly assigned to successful litigators, such as “verbal” and “charisma,” and participants with higher levels of implicit bias were likelier to favor the white litigators’ performances).

\textsuperscript{472} Banaji, Hardin & Rothman, \textit{supra} note 471, at 273.
stories about a person (either male or female) and rate the person's level of dependence, inhibition, insecurity, and passivity (e.g., female stereotypes).  

Participants who had previously had their gender stereotypes triggered by exposure to phrases reinforcing female stereotypes were more likely to evaluate a woman's behavior as dependent, inhibited, insecure, passive, and weak than members of a control group who had not been exposed to the trigger phrases. This demonstrates that mere exposure to statements reinforcing sex stereotypes may affect how the person perceives and thus, evaluates women.

In another study, Alison Lenton and colleagues (2001) presented participants with a list of words, some more typically associated with women (e.g., secretary and nurse) and others more often associated with men (e.g., lawyer and soldier). After briefly distracting participants, the researchers asked the participants to identify the words they had seen. Participants more often erroneously reported that they had seen gender stereotyped words than non-gender-stereotyped words, yet most were completely unaware that each word list had a gender stereotype theme. Thus, Lenton et al. concluded that gender stereotypes could perhaps facilitate the implicit creation of false memories, which may help elucidate the “self-perpetuating nature of stereotypes and their resistance to change.”

It is no great stretch then to assume that at VMI, common usage of denigrating, sex-based slurs like “shedet” and “skirt” as well as sexist phrases like “don’t be a pussy” may similarly “cue” prejudiced behavior and negative attitudes toward women. Indeed, resistant students wrote 2000 LCWB “Last Class with Balls” on desks to intimidate female

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473. Id. at 274–75.
474. Id. at 275.
475. Alison P. Lenton, Irene V. Blair & Reid Hastie, Illusions of Gender: Stereotypes Evoke False Memories, 37 J. EXPERIMENTAL SOC. PSYCHOL. 3, 5–6 (2001). All participants were shown seventy-five words that constituted gender-neutral roles and fifteen words that were gender stereotypes. Of these fifteen words, half of the participants received female stereotype roles and half received male stereotype roles. To obfuscate the gender context, the list of gender-specific stereotype roles was surrounded by the other sixty words. Id.
476. Id. at 5.
477. Id. at 6.
478. Id. at 7.
479. Id.
480. Id. at 11–12.
newcomers.⁴⁸¹ When the first two women became members of Cadre in the spring of 1999,⁴⁸² a cadet newspaper openly questioned their qualifications.⁴⁸³ Third class women encountered resistance when disciplining male rats; some male dykes purportedly encouraged male rats to ignore female upperclassmen.⁴⁸⁴ Likewise, when a female faculty member tried to discipline male cadets, male students allegedly came out onto their stoops and loudly called her a “bitch” and “whore.”⁴⁸⁵

Yet hope remains. First, implicit bias does not necessarily lead to discriminatory actions or decision-making.⁴⁸⁶ To the contrary, individuals can limit the influence of prejudice and stereotypes, particularly when they are highly motivated, externally or internally, to do so.⁴⁸⁷ Second, awareness and acknowledgement of implicit bias can actually decrease it, and hopefully, by extension, its adverse effects.⁴⁸⁸ In the context of race, Alexander Czopp, Margo Monteith and Aimee Mark designed an experiment in which researchers confronted participants about racially stereotyped responses and then administered a confidential stereotype test.⁴⁸⁹ Participant responses provided after the confrontation displayed significantly fewer stereotypes than those given before the confrontation, which indicates that awareness of implicit stereotypes may sometimes

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⁴⁸¹. Brode, supra note 4, at 254.
⁴⁸². Id. at 348.
⁴⁸³. Id. at 349.
⁴⁸⁴. Id. at 348.
⁴⁸⁵. Id. at 174–75.
⁴⁸⁶. Levinson & Young, Gender Bias in the Legal Profession, supra note 221, at 41; see also Levinson, Cai & Young, supra note 449.
⁴⁸⁷. Jack Glaser & Eric D. Knowles, Implicit Motivation to Control Prejudice, 44 J. EXPERIMENTAL SOC. PSYCHOL. 164, 164 (2008); Adam R. Pearson, John F. Dovidio & Samuel L. Gaertner, The Nature of Contemporary Prejudice: Insights from Aversive Racism, 3 SOC. & PERSONALITY PSYCHOL. COMPASS 314, 328 (2009) (finding that participants who were implicitly motivated to avoid prejudice were less likely to display shooter bias while participants with low motivation to control prejudice and/or who did not implicitly consider themselves to be prejudiced were likelier to display shooter bias).
⁴⁸⁸. Alexander M. Czopp, Margo J. Monteith & Aimee Y. Mark, Standing Up for a Change: Reducing Bias Through Interpersonal Confrontation, 90 J. PERSONALITY & SOC. PSYCHOL. 784, 799 (2006). Czopp, Monteith and Mark showed participants images during an online chat and confronted the participant if his or her reactions revealed racial stereotypes. After this confrontation, participants took a confidential stereotype test. According to Levinson and Young, “[a]lthough this study was conducted in the context of racial stereotypes rather than gender stereotypes, the theory behind it should hold true for reducing gender stereotypes as well.” Levinson & Young, Gender Bias in the Legal Profession, supra note 221, at 39.
⁴⁸⁹. Czopp, Monteith & Mark, supra note 488, at 792.
reduce them.490

Finally, exposure to individuals that defy stereotypes can counter them.491 For example, to examine whether exposing female college student participants to atypical female leaders would decrease the students’ implicit gender biases, Nilanjana Dasgupta and Shaki Asgari (2004) asked one group of female students to peruse photos and short biographies of women who defy sex stereotypes like Justice Ruth Bader Ginsburg.492 Then the students took a stereotype/gender IAT.493 Students who had learned about female leaders displayed less implicit gender bias than those who had not; specifically, they more quickly grouped together women with leadership attributes on the IAT.494 Dasgupta and Asgari later compared female students in an all-women’s college with those in a coeducational college, predicting that the former group would display less implicit gender bias after one year of college due to the underrepresentation of women leaders at co-ed colleges.495 They tested the women at the beginning of college and again after one year. Their results revealed that while both groups entered college with nearly equal levels of implicit gender biases, the women at the all-women’s college displayed almost no implicit gender bias after just one year496—not so for the women attending a coeducational college. Significantly, the more female professors a student had, the less implicit gender bias she expressed on the IAT.497

These studies demonstrate that even engrained implicit gender biases are subject to change with proper intervention. Thus, if male-dominated spheres commit to selecting and supporting high-quality female leaders, particularly in traditionally male positions, the spheres can send a powerful message that reduces bias, promotes solidarity between men and women, and cultivates strong leaders of both sexes.

490. Id. at 799.
491. See Nilanjana Dasgupta & Shaki Asgari, Seeing Is Believing: Exposure to Counterstereotypic Women Leaders and Its Effect on the Malleability of Automatic Gender Stereotyping, 40 J. EXPERIMENTAL SOC. PSYCHOL. 642, 645 (2004) (determining that exposure to women role models may temporarily decrease implicit bias); see also The Ugly Face of Disability Hate Crime (BBC Documentary) (participants who attained high scores on the disability IAT, showing significant implicit bias against persons with disabilities, received notably lower scores when they retook the same IAT after experiencing a positive and meaningful interaction with a person with a disability).
492. Id. at 646.
493. Id.
494. Id. at 647–68.
495. Id. at 649.
496. Id. at 650–53.
497. Id. at 651.
V. Implications

Although VMI cadets likely enter college with preexisting beliefs and biases, VMI can still impact those attitudes in a positive way. Indeed, our findings highlight the need for male-dominated spheres, such as VMI, to explicitly acknowledge the existence and impact of sex stereotyping, implicit gender bias, androcentrism, and gender polarization on notions of leadership and to provide a nonjudgmental forum where men and women of all backgrounds can productively discuss these phenomena. Such spheres should further consider adopting empathy and egalitarianism as core values integral to institutional leadership and develop effective ways to cultivate those values in student leaders, faculty, and administrators. Administrators, alumni, and student leaders should collaborate to transform the institutional narrative that women leaders attain rank primarily due to sex. They should also provide diversity and inclusion training as well as leadership training for first-year cadets, provide conflict resolution workshops, regularly conduct climate surveys, and facilitate deliberative dialogue sessions regarding topics like implicit bias, diversity, gender variance, and stereotype threat. Leadership workshops should also address these phenomena and feature guest speakers who overtly challenge sex stereotypes, such as Captain Kristen Griest, one of the first female soldiers to graduate from Army Ranger School and the Army’s first female infantry officer. 498 They should also encourage faculty to equally highlight the societal contributions of both sexes in their courses and scholarship, highlighting, for example, the hundreds of women who disguised themselves as men to fight in the Civil War. 499 Although the aforementioned measures are far from exhaustive, they could make a profound and positive impact.

VI. Conclusion

In conclusion, women leaders evoke resistance because they challenge traditional notions of what it means to be both a leader and a man. Thus,


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despite their uniquely masculine environment, female cadets in leadership often experience the same obstacles faced by women leaders in other male-dominated spheres throughout history. Cadet attitudes toward women in leadership likely reflect the longstanding gender bias, stereotyping, androcentrism, and gender polarization so deeply engrained in our sociocultural experience that, unwittingly or not, they have become a part of who we are and thus, impact how we view of ourselves and each other. Until we can understand how these phenomena influence our perceptions, they will continue to taint our notions of what it means to be a leader and a woman, causing history to repeat itself. Gendered notions of leadership, which are harmful and limiting, will endure. Yet as Bem notes, women leaders should not have to act “exactly like men in order to earn [the respect that] men earn.”500 Nor should they have to “virtually become men to make it” at VMI or anywhere else.501

500. BEM, supra note 1, at 181.
501. Id. at 179.
### Which sex typically displays superior leadership ability at VMI:

<table>
<thead>
<tr>
<th></th>
<th>Women</th>
<th>Men</th>
<th>Equally for Both Sexes</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1: Male</td>
<td>0%</td>
<td>80.33%</td>
<td>19.67%</td>
<td>300</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>241</td>
<td>59</td>
<td></td>
</tr>
<tr>
<td>Q1: Female</td>
<td>10%</td>
<td>30%</td>
<td>60%</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>5</td>
<td>15</td>
<td>30</td>
<td></td>
</tr>
</tbody>
</table>

### Which sex typically displays superior physical prowess at VMI:

<table>
<thead>
<tr>
<th>Typically Displays Superior Physical Prowess at VMI</th>
<th>Women</th>
<th>Men</th>
<th>Equally for Both Sexes</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1: Male</td>
<td>0%</td>
<td>97.67%</td>
<td>2.33%</td>
<td>301</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>294</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>Q1: Female</td>
<td>2%</td>
<td>90%</td>
<td>8%</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>45</td>
<td>4</td>
<td></td>
</tr>
</tbody>
</table>
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Which sex typically displays superior academic performance at VMI:

<table>
<thead>
<tr>
<th>Typically Displays Superior Academic Performance at VMI</th>
<th>Women</th>
<th>Men</th>
<th>Equally for Both Sexes</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1: Male</td>
<td>10.30%</td>
<td>28.57%</td>
<td>61.13%</td>
<td>301</td>
</tr>
<tr>
<td></td>
<td>31</td>
<td>86</td>
<td>184</td>
<td></td>
</tr>
<tr>
<td>Q1: Female</td>
<td>38%</td>
<td>6%</td>
<td>56%</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>19</td>
<td>3</td>
<td>28</td>
<td></td>
</tr>
</tbody>
</table>

When I see that a female cadet is selected for a high position or award, I think . . .

<table>
<thead>
<tr>
<th></th>
<th>She Must Have Deserved It</th>
<th>She Was Chosen Primarily Because She Was Female</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1: Male</td>
<td>22.18%</td>
<td>77.82%</td>
<td>293</td>
</tr>
<tr>
<td></td>
<td>65</td>
<td>228</td>
<td></td>
</tr>
<tr>
<td>Q1: Female</td>
<td>59.18%</td>
<td>40.82%</td>
<td>49</td>
</tr>
<tr>
<td></td>
<td>29</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td>Total Respondents</td>
<td>94</td>
<td>248</td>
<td>342</td>
</tr>
</tbody>
</table>
For the two most significant leadership characteristics noted above, please indicate whether each is associated more with one sex or with both relatively equally.

### The Most Important Leadership Characteristic Noted Above

<table>
<thead>
<tr>
<th>Q1: Male</th>
<th>More With Men</th>
<th>More With Women</th>
<th>Both Sexes Equally</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>54.18%</td>
<td>2.55%</td>
<td>43.27%</td>
<td>275</td>
</tr>
<tr>
<td></td>
<td>149</td>
<td>7</td>
<td>119</td>
<td></td>
</tr>
<tr>
<td>Q1: Female</td>
<td>29.17%</td>
<td>10.42%</td>
<td>60.42%</td>
<td>48</td>
</tr>
<tr>
<td></td>
<td>14</td>
<td>5</td>
<td>29</td>
<td></td>
</tr>
</tbody>
</table>

### The Second Most Important Leadership Characteristic Noted Above

<table>
<thead>
<tr>
<th>Q1: Male</th>
<th>More With Men</th>
<th>More With Women</th>
<th>Both Sexes Equally</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>54.58%</td>
<td>3.66%</td>
<td>41.76%</td>
<td>273</td>
</tr>
<tr>
<td></td>
<td>149</td>
<td>10</td>
<td>114</td>
<td></td>
</tr>
<tr>
<td>Q1: Female</td>
<td>18.75%</td>
<td>20.83%</td>
<td>60.42%</td>
<td>48</td>
</tr>
<tr>
<td></td>
<td>9</td>
<td>10</td>
<td>29</td>
<td></td>
</tr>
</tbody>
</table>

I don't mind having a keydet of the opposite sex in a leadership position supervising me.

### I Don't Mind Having a Keydet of the Opposite Sex in a Leadership Position Supervising Me.

<table>
<thead>
<tr>
<th>Q1: Male</th>
<th>Strongly Agree</th>
<th>Somewhat Agree</th>
<th>Somewhat Disagree</th>
<th>Strongly Disagree</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>20.81%</td>
<td>35.57%</td>
<td>19.46%</td>
<td>24.16%</td>
<td>298</td>
</tr>
<tr>
<td></td>
<td>62</td>
<td>106</td>
<td>58</td>
<td>72</td>
<td></td>
</tr>
<tr>
<td>Q1: Female</td>
<td>95.92%</td>
<td>4.08%</td>
<td>0%</td>
<td>0%</td>
<td>49</td>
</tr>
<tr>
<td></td>
<td>47</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>