

TALKING AROUND RACE: STEREOTYPES, MEDIA, AND THE TWENTY-FIRST CENTURY COLLEGIATE ATHLETE

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INTRODUCTION

Perhaps one of the largest reasons race fails to reach the apex of many sports conversations is that the people who do choose to tackle the subject often do such a poor job of it. Indeed, it is clear that sportscasters can lose their jobs quite quickly if they discuss race in an inappropriate way. CBS's Jimmy "The Greek" Snyder was fired after his comments about black slave breeding as a reason for black athletes' successes.¹ ESPN's Rush Limbaugh resigned after his comments about why the media tends to embrace former Philadelphia Eagles quarterback Donovan McNabb caused controversy. He suggested that the media overplayed McNabb's quarterbacking skills because the media was "very desirous that a black quarterback do well."² One would think that every time sportscasters' comments about race trigger such vehement oppositional reactions it would provide a vehicle for increased discussion of race in sport and advance the dialogue. The truth is that this rarely occurs.

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1. Paul M. Anderson, *Racism in Sports: A Question of Ethics*, 6 MARQ. SPORTS L.J. 357, 362 (1996); see also Jay Sharbutt, *Jimmy "The Greek" Is Fired by CBS*, L.A. TIMES, Jan. 17, 1988, Pt. 3, at 1, available at http://articles.latimes.com/print/1988-01-17/sports/sp-36803_1_jimmy-snyder.

2. Patrick K. Thornton, *The Legacy of Johnnie Cochran, Jr.: The National Football League's Rooney Rule*, 33 T. MARSHALL L. REV. 77, 81 (2007); see also Richard Sandomir, *Limbaugh Resigns From ESPN's N.F.L. Show*, N.Y. TIMES, Oct. 2, 2003, at D1, available at <http://www.nytimes.com/2003/10/02/sports/football-limbaugh-resigns-from-espn-s-nfl-show.html?pagewanted=print&src=pm>.

People are wrong when they argue that race is now *omitted* from media dialogues in college sport. It is more accurate to say that race is never *directly alluded* to. Race in sports has become something to talk *around*, something to divert, and, sometimes, something to encode. The overt has mostly diminished, while the covert has been embedded within dialogues surrounding race, but without ever being about race. Journalist Jon Entine argues that “[a]lthough discussing racial differences is likely to provoke strong reactions, on balance and in proper context, strong emotions are healthy.”³ The reality, though, is that sports media professionals are more likely to evade the discussion of race altogether for fear that one misspoken clause could result in a calamitous career downfall.⁴

This Article examines how we discuss race in sport with all of its nuance, subtext, and misattribution. Most specifically, three case studies will be used: (1) athletic intelligence of college football players as defined by the Wonderlic Test,⁵ (2) the “one-and-done” college basketball player,⁶ and (3) the “out-of-place” or “out-of-position” college athlete.⁷ The conversations surrounding these athletes are tinged with racial undertones, without specifically mentioning them. Sadly, this is how we discuss race in twenty-first century sports media.

I. DEFINING RACIAL DIFFERENCE

When attempting to discuss racial media depictions within collegiate sports, one inevitably reverts to discussions of difference, fairness or unfairness, and the historically horrendous

3. JON ENTINE, *TABOO: WHY BLACK ATHLETES DOMINATE SPORTS AND WHY WE'RE AFRAID TO TALK ABOUT IT* 8 (2000).

4. See Anderson, *supra* note 1, at 359.

5. See Christopher Hatch, *Fourth and Short on Equality: The Disparate Impact of the NFL's Use of the Wonderlic Intelligence Test and the Case for a Football-Specific Test*, 41 CONN. L. REV. 1669, 1673 (2009).

6. See NAT'L BASKETBALL ASS'N, *CBA 101: HIGHLIGHTS OF THE COLLECTIVE BARGAINING AGREEMENT BETWEEN THE NATIONAL BASKETBALL ASSOCIATION (NBA) AND THE NATIONAL BASKETBALL PLAYERS ASSOCIATION (NBPA)* 13 (2010), available at <http://www.nba.com/.element/mp3/2.0/sect/podcastmp3/PDF/CBA101.pdf> (requiring players to reach the age of nineteen and be one year removed from high school before becoming eligible for the NBA Draft, which leads many high school basketball players to enroll in college to play basketball for the purpose of fulfilling this requirement).

7. See Anderson, *supra* note 1, at 367.

treatment of non-white athletes.⁸ This usually leads to a binary discussion of what is right or wrong, fair or unfair, true or false, and progressive or regressive.⁹ However, the combination of race, sport, and the media—particularly in the twenty-first century—is much more nuanced than that, with the result being that one must first discern and identify the language we unpack to explain racial differences. For the purposes of this Article, important distinctions must first be made among the following words: (1) bias, (2) stereotype, (3) prejudice, and (4) racism. These terms are hierarchical in nature and ordered in sequence, starting with the seemingly most benign term.

Keep in mind that none of these terms are optimal when discussing race, yet neither are they interchangeable, because each connotes a different meaning. For instance, bias could be argued to be the most benign, as it is not as closely tied to race and could even be positive and, moreover, fair. If Restaurant A offers exemplary food and service while Restaurant B offers neither, one could justifiably have a bias toward Restaurant A. Applying such an analogy to race and athletics is certainly dicier, yet bias could be considered the most benign of the terms being discussed here because there is at least some evidence of, or a reference point to substantiate, such a claim.

Stereotypes, in contrast, offer a bias combined with a faulty syllogism. This usually involves the employment of one piece of evidence carried to a degree of certainty that is crude and, usually, quite unfair. Consider the following example:

Evidence: None of the winning swimmers are black.

Faulty Conclusion: Black people cannot swim well.

Of course, this conclusion fails to note mitigating factors, including social stigmas, economic options, and geographic circumstances. For instance, decades ago, blacks were banned from swimming in pools, lakes, and oceans in many parts of the South, resulting in a relative paucity of adult blacks adept in

8. See BILLY HAWKINS, *THE NEW PLANTATION: BLACK ATHLETES, COLLEGE SPORTS, AND PREDOMINANTLY WHITE NCAA INSTITUTIONS* 58–59 (2010).

9. See *id.* at 157–82 (describing how reforms have been applied to intercollegiate sports on a reactive, ongoing basis).

swimming.¹⁰ It is likely fair to conclude that their lack of swimming skills resulted in them avoiding swimming with their children, grandchildren, and so forth. Yet, the stereotype remains in place because these differences have not been taken into account.¹¹

Third, there is prejudice. In the root nature of the word, we see that it involves the action of “pre-judging.” Thus, there is no piece of evidence that is even employed in a faulty manner. These conceptions are based on little or no evidence at all—instead, they are based upon a sharp sense of uneasiness with someone who is different from us and usually based on one or more identity-oriented variables. Social identity theory refers to in-groups and out-groups—an “us” versus a “them.”¹² Prejudice involves the employment of what are usually external and visible variables to form a judgment of the “them” as being lesser than the pre-conceived “us.”

Finally, there is racism. This is a term that should be reserved for truly heinous acts and beliefs, but often gets employed too frequently in sports media critiques when racial ignorance is sometimes the more evident culprit.¹³ Racism involves the employment of prejudice in combination with notions of power (or lack thereof), inferiority, and exclusion.¹⁴ While the previous three terms can be applied to a wide variety of issues beyond race, racism is exclusively tied to racial marginalization or—far worse—to discussions of racial superiority or inferiority, dominance, or even extinction.¹⁵

10. Michelle Chen, *Black Women Don't Swim?*, COLORLINES (July 21, 2010), http://colorlines.com/archives/2010/07/black_women_dont_swim.html (last visited Jan. 29, 2012).

11. *Id.*

12. Henri Tajfel, *Experiments in a Vacuum*, in *THE CONTEXT OF SOCIAL PSYCHOLOGY: A CRITICAL ASSESSMENT* 69, 94 (Joachim Israel & Henri Tajfel eds., 1972).

13. See *Stevens v. Tillman*, 855 F.2d 394, 402 (7th Cir. 1988) (“Accusations of racism no longer are obviously and naturally harmful. The word has been watered down by overuse, becoming common coin in political discourse.”).

14. Anderson, *supra* note 1, at 358.

15. *Id.* at 358 n.3.

II. CASE STUDY #1: RACE AND THE WONDERLIC TEST

The Wonderlic Test has been a staple of National Football League (“NFL”) draft preparation for several decades.¹⁶ Fifty questions are asked in just twelve minutes and the stakes are high, specifically if you are a quarterback prospect.¹⁷ Connections are more directly made to one’s Intelligence Quotient (“IQ”) than some sort of SAT measure;¹⁸ an average score would approximately be twenty, very roughly equated to an IQ of one hundred.¹⁹ Most NFL teams are looking for an above average score (twenty-one or higher) to feel confident about a quarterback prospect.²⁰

One would think that Wonderlic Test scores would be kept private, knowing that raw measures of intelligence should not be measured in rapid-fire, twelve-minute formats.²¹ However, this is not the case. Especially when scores skew high or low, media reports inevitably follow. Former Cincinnati Bengals punter Pat McNally is known as the only person to get a perfect fifty;²² current Buffalo Bills quarterback Ryan Fitzpatrick reportedly scored a forty-eight—in only nine minutes.²³ Conversely, former Tennessee Titans quarterback Vince Young was rumored to have scored a six on his first attempt.²⁴ Former Washington Redskins quarterback Donovan McNabb scored just a fourteen.²⁵ 2011 draft

16. Hatch, *supra* note 5, at 1673 (discussing how former Dallas Cowboys head coach Tom Landry began using the Wonderlic Test in the early 1970s and was promptly followed in the practice by all other teams).

17. *Id.* (“Quarterback is football’s central thinking position.”).

18. Ryan Christopher DeVault, *Wonderlic Test Begins at the 2009 NFL Combine; Every Prospect Is Required to Take It*, YAHOO! (Feb. 19, 2009), <http://voices.yahoo.com/wonderlic-test-begins-2009-nfl-combine-every-2697440.html?cat=14>.

19. *Id.*

20. Dan Pompei, *Notre Dame’s Clausen Wild Card in NFL Draft*, CHI. TRIB. (Apr. 19, 2010), http://articles.chicagotribune.com/2010-04-19/sports/ct-spt-0420-clausen-20100419_1_workout-for-nfl-teams-nfl-draft-todd-mcshay.

21. See Hatch, *supra* note 5, at 1673.

22. Jerry Crowe, *McNally’s Life Off the Field Has Eclipsed Playing Career*, L.A. TIMES (Apr. 24, 2011), <http://articles.latimes.com/2011/apr/24/sports/la-sp-crowe-20110424>.

23. Amy Shipley, *Ryan Fitzpatrick’s Wonderlic Score: What Does it Mean?* WASH. POST (Oct. 25, 2011), http://www.washingtonpost.com/sports/redskins/ryan-fitzpatrick-wonderlic-score-what-does-it-mean/2011/10/20/gIQAvz51GM_story.html.

24. Pete Dougherty, *Will Wonderlic Cause Teams to Worry About Young?*, USA TODAY (Mar. 1, 2006, 12:24 AM), http://www.usatoday.com/sports/football/draft/2006-03-01-young-wonderlic_x.htm.

25. John P. Lopez, *The Rule of 26-27-60 Helps Predict NFL Quarterback Success or Failure*, SI.COM (July 8, 2010 2:06 PM), http://sportsillustrated.cnn.com/2010/writers/john_

prospects Patrick Peterson (cornerback, Louisiana State University) and A.J. Green (wide receiver, University of Georgia) scored a nine and a ten, respectively, and could lose millions of dollars as a result.²⁶

One should note that these positive score examples arise from white athletes and the negative-skewing score examples come from black athletes. Still, one could argue that this is fair, since everyone takes the test and interpretations are based on the result of one's performance. However, there is one major reason why such conclusions are not fair—studies have shown the Wonderlic Test is not a determinant of future football success.²⁷ Brian D. Lyons, Brian J. Hoffman, and John W. Michel, scholars of organizational behavior and psychology, found no correlation between intelligence scores and future NFL performance—and even found a significant negative correlation for several football positions.²⁸

However, such conclusions do not protect low-scoring athletes from media criticism and scorn. Nolan Nawrocki, a sports editor, reported that Patrick Peterson's low Wonderlic Test score led one scout to comment that Peterson "plays like a low-test guy"²⁹ and another to state that "he has an instinct issue, and I think it's tied to his mental (ability). He can only handle so much."³⁰ Comments such as these could be viewed as even more defamatory compared to comments about black college athletes being "dumb jocks."³¹ The "dumb jock" stereotype merely implies that a black athlete is not excelling in the classroom because of a

lopez/07/08/qb.rule/index.html.

26. Nolan Nawrocki, *Low Wonderlic Scores Ding Elite NFL Prospects*, PRO FOOTBALL WEEKLY (Mar. 17, 2011, 9:01 PM), <http://www.profootballweekly.com/2011/03/17/low-wonderlic-scores-ding-elite-nfl-prospects>.

27. Luis DeLoureiro, *Cold Hard Football Facts: The Unreliability of the Wonderlic Test*, SI.COM (Mar. 24, 2011, 12:09 PM), <http://sportsillustrated.cnn.com/2011/football/nfl/03/24/wonderlic-test/index.html>.

28. See Brian D. Lyons et al., *Not Much More Than g? An Examination of the Impact of Intelligence on NFL Performance*, 22 HUM. PERFORMANCE 225, 225–45 (2009). According to this study, the positions with strong negative correlations between general mental ability ("GMA") test scores and NFL performance included tight ends and defensive backs. *Id.* at 234 tbl.3.

29. Nawrocki, *supra* note 26.

30. *Id.*

31. See Gary A. Sailes, *An Investigation of Campus Stereotypes: The Myth of Black Athlete Superiority and the Dumb Jock Stereotype*, 10 SOC. SPORT J. 88, 93 (1993) (discussing the "dumb jock" stereotype attached to African American student athletes).

lack of desire or focus,³² but the athlete who others suggest can mentally “only handle so much” is portrayed as being incapable of excelling intellectually.³³

Consider, as well, the fact that certain Wonderlic Test scores are leaked to the public and others are not.³⁴ Given the polarizing racial component of the leaks, it is clear that not all prospective professional players are being treated equally. As Vince Young commented about his Wonderlic Test score (which he later retook and received a far better, but still underwhelming, score of sixteen):

That’s someone hating, trying to make it look like I’m dumb, which I know I’m not . . . But it was also disrespectful, just how it got out. For the first time in history, somebody’s score gets out and gets talked about like that. Somebody wants to find something on me, which wasn’t even true. It was horrible.³⁵

Conversely, overwhelmingly great aptitude was attributed to athletes based on the twelve-minute Wonderlic Test examination, when in the same year the majority-white draft class of the New York Jets was found to have the highest composite Wonderlic Test score of all NFL teams.³⁶ Sports journalists, Rich Cimini and Michael O’Keefe, subsequently reported that, “the rebuilding Jets might not be ready to compete for a Super Bowl, but if they ever get invited to a Quiz Bowl, watch out.”³⁷

32. *See id.* at 89.

33. *See* Nawrocki, *supra* note 26 (quoting an anonymous NFL decision-maker who claimed “it is hard for dumb receivers” to reach their “full potential”).

34. Manish Mehta, *Wonderlic Scores for This Year’s Crop of QBs Leaked*, N.Y. DAILY NEWS (Apr. 13, 2006, 10:25 AM), <http://www.nydailynews.com/blogs/node/120275/2011/03/wonderlic-scores-for-this-years-crop-of-qbs-leaked>.

35. Jarrett Bell, *Young Getting Restless Amid Pre-Draft Storm*, USA TODAY, Apr. 13, 2006, at 1C.

36. Rich Cimini & Michael O’Keefe, *If Nothing Else, Jets Have Brains This Year*, N.Y. DAILY NEWS (May 7, 2006), http://articles.nydailynews.com/2006-05-07/sports/18336335_1_dan-zanes-wonderlic-jets.

37. *Id.*

III. CASE STUDY #2: “ONE-AND-DONE” BASKETBALL PLAYERS

While people could debate decisions that have been the most damaging to collegiate athletics in recent years, the National Basketball Association (“NBA”) collective-bargaining agreement that changed NBA Draft eligibility beginning in 2006³⁸ likely would be at the top of many lists. Before this development, players were eligible to be drafted straight from high school to the NBA.³⁹ Such a practice often was not ideal for player development,⁴⁰ but resulted in stars such as Kobe Bryant,⁴¹ LeBron James,⁴² and Dwight Howard⁴³ experiencing longer and more lucrative careers.⁴⁴ The new rule indicated that players must be at least one year removed from high school and also be at least nineteen years of age.⁴⁵ The rule resulted in the “one-and-done” college basketball player.⁴⁶

Yes, under the rule, one-and-done players would experience some college and, perhaps, find that they should stay in school longer to hone their skills or advance their academic prospects, but the result has far too often resulted in three undercurrents percolating—sometimes rightly so—within media conversations: (1) elite college basketball players are being forced to enter college even when they have no interest in academics;⁴⁷

38. See NAT'L BASKETBALL ASS'N, 2005 COLLECTIVE BARGAINING AGREEMENT art. X § 1, available at <http://www.nbpa.org/cba/2005> (eliminating eligibility for basketball players drafted straight from high school).

39. Howard Beck, *N.B.A. Draft Will Close Book on High School Stars*, N.Y. TIMES (June 28, 2005), <http://www.nytimes.com/2005/06/28/sports/basketball/28draft.html>.

40. See *id.*

41. See *id.*

42. See Chris Broussard, *Pro Basketball; James Sparkles as the Draft's Leading Man*, N.Y. TIMES (June 27, 2003), <http://www.nytimes.com/2003/06/27/sports/pro-basketball-james-sparkles-as-the-draft-s-leading-man.html>.

43. Ian Thomsen, *Higher Calling: Dwight Howard, the Likely No. 2 Pick in the NBA Draft, Is on a Mission to Do God's Work by Playing Transcendental Basketball*, SI.COM (June 21, 2004), <http://sportsillustrated.cnn.com/vault/article/magazine/MAG1032313/index.htm>.

44. Greg Bianchi, *Age Requirement in Professional Sport*, 9 SPORT J. 2006, <http://www.thesportjournal.org/article/age-requirement-professional-sport>.

45. NAT'L BASKETBALL ASS'N, *supra* note 38.

46. Adrian Wojnarowski, *Committee Could Study NBA Draft Rule*, YAHOO! SPORTS (Nov. 27, 2011, 12:20 AM), http://sports.yahoo.com/nba/news?slug=aw-wojnarowski_nba_draft_rule_112611 (describing the “one-and-done” basketball player as one who spends only a year playing college basketball before declaring eligibility for the draft and leaping to the NBA).

47. Kevin Burke, *The “One and Done” Rule's Impact on College Basketball*, HOOP DOCTORS (Mar. 8, 2010), <http://thehoopdoctors.com/online2/2010/03/the-one-and-done-rules-impact-on-college-basketball/>.

(2) elite college basketball players are “performing” the role of student-athlete;⁴⁸ and (3) elite college basketball players see being “one-and-done” as a status symbol,⁴⁹ meaning that remaining in school becomes a point of athletic shame.

Journalists such as John Smallwood report that we now have the “farce of the student-athlete.”⁵⁰ Basketball coaching legend Bob Knight has commented: “Now you can have a kid come to school for a year and play basketball and he doesn’t even have to go to class. He certainly doesn’t have to go to class the second semester. I’m not exactly positive about the first semester.”⁵¹ The racial component of the issue is revealed when considering demographics within NCAA basketball and, correlatively, the NBA. According to the 2010 Racial Report Cards issued by The Institute for Diversity and Ethics in Sport (“TIDES”), 61 percent of all college basketball players are black and that percentage swells to 77 percent of all professional players in the NBA.⁵² The percentage of one-and-done college athletes skews even more heavily towards black players.⁵³ Thus, the predominant narrative becomes one of race: black players are the ones with no interest in college; black players are the ones who are “performing” the role of student-athlete; black players are the ones who see staying in school as a point of shame if they cannot become “one-and-done.”⁵⁴

The public becomes inundated with the binary distinctions of players who are athletically-focused versus those who are

48. Ben Bolch, *How Much Fun from One-and-Done?*, L.A. TIMES (May 17, 2011), <http://articles.latimes.com/2011/may/17/sports/la-sp-0518-one-and-done-20110518>.

49. *One-and-Done Rule: Status Quo with Several (Not Good) Options*, RUSH THE COURT (Dec. 1, 2011, 1:55 PM), <http://rushthecourt.net/2011/12/01/one-and-done-rule-apparently-status-quo-with-several-not-good-options/>.

50. John Smallwood, *Brandon Jennings Won't Set Euro Trend in NBA*, PHILA. DAILY NEWS, June 30, 2009, at 55.

51. J. Rohde, *Knight: Rule May Affect Integrity of College Sports*, OKLAHOMAN, Feb. 21, 2007, at 2C.

52. RICHARD LAPCHICK ET AL., EXECUTIVE SUMMARY, THE 2010 RACIAL AND GENDER REPORT CARD: COLLEGE SPORT (2010), available at http://www.tidesport.org/RGRC/2010/2010_College_RGRC_FINAL.pdf; RICHARD LAPCHICK ET AL., EXECUTIVE SUMMARY, THE 2010 RACIAL AND GENDER REPORT CARD: NATIONAL BASKETBALL ASSOCIATION, available at [http://www.tidesport.org/RGRC/2010/2010_NBA_RGRC\[1\].pdf](http://www.tidesport.org/RGRC/2010/2010_NBA_RGRC[1].pdf).

53. See Morty Ain et al., *Quick Studies: We Talk to Alums of the One-and-Done University*, ESPN (Nov. 8, 2011 5:43:00 PM), http://espn.go.com/mens-college-basketball/story/_/id/7207951/ncb-derrick-rose-kyrie-irving-37-other-players-nba-one-year-rule-espn-magazine (noting that of the thirty-nine “one-and-done” players, thirty-five are African American).

54. *One-and-Done Rule: Status Quo with Several (Not Good) Options*, *supra* note 49.

academically-focused. Media reports suggest different strategies for building a winning program, ranging from programs that gradually build players over four years⁵⁵ to the University of Kentucky (“UK”) program, known in some circles as “One and Done University”⁵⁶ after having a record four one-and-done athletes drafted in the first round of the 2010 NBA Draft.⁵⁷ A local media article then strategized how the UK Wildcats could do well in 2012 because they have:

A more academically oriented top player, [Brandon] Knight [who] might still be around when the next one-and-done possibility makes it onto the UK campus in 2011. That would be Marquis Teague. He could be more in the line of a [John] Wall-type player, a guy who comes in and has the obvious talent to only be around for a season.⁵⁸

Again, the athletes discussed in these scenarios are almost universally black, providing a highly-charged racial component to the debate as to whether the term “student-athlete” is now a misnomer within men’s college basketball. An interesting ancillary to the discussion was presented by the case of Brandon Jennings, a player who opted to forgo the “one” part of his “one-and-done” by playing his 2008–2009 season in Europe rather than the University of Arizona, where he originally committed to attend.⁵⁹ The Milwaukee Bucks then drafted him in 2009.⁶⁰

55. See, e.g., John Klein, *The One-and-Done Rule Hurts College Game*, TULSA WORLD, Mar. 17, 2011, at B1 (“Now a great way to analyze teams is to look at the age of the players. The more veteran teams are the better teams in the tournament. The teams with older players are the ones to watch for in the Final Four.”).

56. See Kyle Peck, *One and Done—Fact or Fiction?*, CARDS & CATS (Nov. 22, 2011), <http://cardsandcats.com/2011/11/22/one-and-done-fact-or-fiction-2/>.

57. Andy Katz, *Five Wildcats Taken in First Round*, ESPN (June 25, 2010 8:18 PM), http://sports.espn.go.com/nba/draft2010/columns/story?columnist=katz_andy&page=katzoncats-100624.

58. Mark Mathis, *Calipari a Magnet for 1-and-Done Standouts*, MESSENGER INQUIRER, Apr. 24, 2010, at B1.

59. Andy Katz, *Jennings Goes Pro, Signs with Pallacanestro Virtus Roma*, ESPN (July 17, 2008, 8:40 AM), <http://sports.espn.go.com/ncb/news/story?id=3491998>.

60. Dave De Grace, *Bucks Draft Pick Survives Year in Italy*, USA TODAY (June 26, 2009, 3:40 PM), http://www.usatoday.com/sports/basketball/nba/2009-06-26-1001585979_x.htm.

Much media discussion was focused on this Plan B option for college basketball players, again with the presumed notions of farce in Plan A.⁶¹ Sports journalist Ryan White wrote:

By rule, the best high school players in the country are supposed to pretend to go to college for a year . . .

. . . .

[If the Brandon Jennings choice became a trend,] college basketball would end up being played completely by players who also go to college. It's crazy enough to work.⁶²

Five years into the one-and-done experiment, it clearly has its detractors.⁶³

This is, however, another case in which the media talks around race, leaving the public to fill in the gaps within the conceptions of what is wrong with the current system. Take, for instance, college baseball, which offers a different racial component (majority white players)⁶⁴ and a different eligibility system (either enter the professional baseball system after high school or stay in the college system for three years).⁶⁵ The result is a college baseball player who is considerably more likely to complete his degree and a representation of the student-athlete with which far more people are comfortable.⁶⁶ If the baseball and basketball eligibility rules were interchanged, or even equalized, the racial component within these discussions would alter in noteworthy ways as well.

61. Pete Thamel, *At 19, Plotting New Path to N.B.A., via Europe*, N.Y. TIMES, Oct. 4, 2008, at A1; Ryan White, *Jennings' Foreign Play Looks Like College Win*, OREGONIAN, July 13, 2008, at C2.

62. White, *supra* note 61.

63. See, e.g., Burke, *supra* note 47; Klein, *supra* note 55; Dick Vitale, *One-and-Done Rule Hurts Hoops More than It Helps*, USA TODAY (Feb. 15, 2011, 3:14:39 PM), http://www.usatoday.com/sports/college/columnist/vitale/2011-02-14-one-and-done-rule_N.htm.

64. James Wagner, *Baseball's Other Racial Barrier*, WALL ST. J., June 24, 2008, at A14.

65. *First Year Player Draft: Official Rules*, MLB.COM, <http://mlb.mlb.com/mlb/draftday/rules.jsp>.

66. See *NCAA Grad Rates Hit All-Time High*, NCAA.COM (Oct. 25, 2011), <http://www.ncaa.com/news/ncaa/article/2011-10-25/ncaa-grad-rates-hit-all-time-high>.

IV. CASE STUDY #3: “OUT-OF-PLACE” OR “OUT-OF-POSITION”
COLLEGE ATHLETES

The related, yet fundamentally different, concepts of “sports selection” and “sports stacking” are highly-relevant to the discussion of how media portrays athletes of different races as being either “in-place” or “out-of-place” within societal cognitive schemas.⁶⁷ “Sport selection” deals with the sport that a player ultimately chooses to devote time to; when presented with fall sport options that include football and soccer, athletes have a tendency to segregate racially to some extent.⁶⁸ “Sports stacking” delves into the positional choices in which players are encouraged to gravitate within team sports, ranging from white linemen in football to Latino infielders in baseball.⁶⁹ Overt stereotyping of different races in different positions has diminished greatly within mainstream media; for instance, journalist Jennifer Byrd and journalism professor Max Utsler found black quarterback stereotyping to be “as dead as disco.”⁷⁰ However, dialogues nonetheless diverge along racial lines based on the sport and position that college athletes play.⁷¹ In other words, different types of language are employed for athletes of different races, often based on how we attribute one’s success or failure in a given sport.⁷²

Thus, we have the following comments about white basketball player Tyler Hansbrough: “everybody loves his motor;”⁷³ “[t]he guy never takes a play off He’s a smart player, too. Not just a brute;”⁷⁴ and “[h]e’s got a very high basketball I.Q.”⁷⁵ Similar

67. See ANDREW C. BILLINGS, MICHAEL L. BUTTERWORTH & PAUL D. TURMAN, COMMUNICATION AND SPORT: SURVEYING THE FIELD 111–15 (2012).

68. *Id.*

69. *Id.*; see also Benjamin Margolis & Jane Allyn Piliavin, “Stacking” in Major League Baseball: A Multivariate Analysis, 16 SOC. SPORT J. 16, 16–34 (1999).

70. Jennifer Byrd & Max Utsler, *Is Stereotypical Coverage of African-American Athletes as “Dead as Disco”? An Analysis of NFL Quarterbacks in the Pages of Sports Illustrated*, 2 J. SPORTS MEDIA 1, 1–28 (2007).

71. See BILLINGS ET AL., *supra* note 67, at 111–15.

72. *Id.* at 115–22.

73. Thayer Evans, *Hansbrough Stays Quiet About His Future Options*, N.Y. TIMES, Apr. 6, 2008, at A7, available at <http://www.nytimes.com/2008/04/06/sports/ncaabasketball/06sidebar2.html>.

74. *Id.*

75. *Id.*

comments have been made about white running back Toby Gerhart:

Gerhart is majoring in management, science and engineering

This quarter, Gerhart is taking five courses. He could not help himself. He took calculus, because he wanted to learn from the professor, who had an excellent reputation. He enrolled in Introduction to Prehistoric Archaeology because it sounded interesting.

. . . .

. . . . Asked how he manages, Gerhart chuckled and said, “A lot of late nights.”

On the field, Gerhart is indefatigable. He runs like a bull wearing ballet slippers. His strengths—size, power, balance, toughness, competitiveness—are hard to find in one player and harder to teach.⁷⁶

Such comments are quite positive, but do not occur in a vacuum. When attributed to certain players with certain racial backgrounds, they tacitly infer that their intelligence or work ethic is some form of anomaly—a reason for their success in a very competitive world. Consequently, when considering comments about black quarterback Cam Newton’s “fleet feet” as just one of many attributions for his success in an overly positive *Wall Street Journal* article,⁷⁷ while there may be nothing immediately wrong with such a characterization, when repeated an inordinate number of times through media,⁷⁸ a dialogue is created in which

76. Karen Crouse, *Put a Heisman in Stanford Back’s Juggling Act*, N.Y. TIMES, Nov. 18, 2009, at B13, available at <http://www.nytimes.com/2009/11/19/sports/ncaafootball/19stanford.html?pagewanted=all>.

77. Darren Everson & Ben Cohen, *The Year of the Black Quarterback*, WALL ST. J., Dec. 30, 2010, at D5, available at <http://online.wsj.com/article/SB10001424052970203525404576049970496106128.html>.

78. See, e.g., *id.*; Chris Dufresne, *As the NFL Draft Nears, Opinions on Cam Newton Are All over the Map* (Apr. 26, 2011), <http://articles.latimes.com/2011/apr/26/sports/la-sp-0427-cam-newton-nfl-draft-20110427>; Matt Williamson, *Rookie Watch: Awards Go to . . .*, ESPN.COM (Dec. 21, 2011), http://espn.go.com/nfl/story/_/id/7422931/cam-newton-alton-smith-worthy-rookie-accolades.

other skills are presumably diminished through their simple omission as attributions for success.

CONCLUSION

Thus, the twenty-first century finds sports media, as perceived, to be in a racially-enlightened era,⁷⁹ and in many ways (certainly compared to the likes of Jimmy “The Greek” Snyder and Rush Limbaugh) this is true. However, such a characterization feeds into the post-Obama-election conception of a “post-racial world,”⁸⁰ one that has proven to be as falsely acclaimed within politics as it is within sports.⁸¹ Race still is a major component in every aspect of collegiate sports and some of the preconceived notions of the prior century (e.g., black athletes as intellectually inferior⁸² and white athletes as born leaders and hard workers⁸³) are manifest in much more subtle and covert ways in modern media dialogues.

One prominent argument against talking about race in sports in such an overt manner is that sports are intended to be a diversion—a media offering that is not a matter of life or death and in which winning and losing matters, but not to an overwhelming degree in the larger scheme of events. The argument of sport as a media distraction is certainly a valid one, yet it ultimately envelops integral issues of race within notions of culture and background as needless afterthoughts. However, something is missed when one talks *around* rather than *about* race in sport. For instance, one cannot grasp a complete story of someone like black, Olympic speed skating champion Shani Davis⁸⁴ without discussing how rare it was for a black youth in

79. *But see* KEVIN HYLTON, “RACE” AND SPORT: CRITICAL RACE THEORY 81–105 (2008) (finding that an analysis of two of the world’s highest profile sports magazines, *Sports Illustrated* and *Observer Sport Monthly*, during 2006 contained “evidence of racialization and its impact on identities, whitecentrism, difference and mimetic accuracy, and enlightened racism in the media”).

80. Shelby Steele, *Obama’s Post-Racial Promise*, L.A. TIMES (Nov. 5, 2008), <http://www.latimes.com/news/opinion/opinionla/la-oe-steele5-2008nov05,0,6049031.story>.

81. Touré, *No Such Place as “Post-Racial” America*, N.Y. TIMES (Nov. 8, 2011, 1:48 PM), <http://campaignstops.blogs.nytimes.com/2011/11/08/no-such-place-as-post-racial-america/>.

82. *See* BILLINGS ET AL., *supra* note 67, at 115–22.

83. *Id.*

84. Michael Sokolove, *Shani Davis, on Edge*, N.Y. TIMES (Feb. 4, 2010), <http://www>.

2012]

TALKING AROUND RACE

213

inner-city Chicago to select skating as their sport of competitive choice.⁸⁵

College sport typically offers the first mediated view or story line of an athlete. This is the time in young athletes' lives in which their stories get told—and where their key story lines become cemented for years to come. Some of these narratives may seem to be positive, but are nonetheless only partial understandings of far more complex athletic backgrounds and collegiate realities. Talking around race is problematic in this way; media outlets tend to offer only part of the story and those parts are rarely conceptualized within a grander, racialized understanding of collegiate sports.

nytimes.com/2010/02/07/magazine/07Davis-t.html.

85. *Id.*

