

Racial Equality in Nineteenth Century Michigan
The People v. The Board of Education of Detroit, aka Workman (1869)
18 Mich. 400

The Workman case was an early victory for racial equality. In Workman, the Court determined that despite an earlier law that provided the city broad discretionary powers in regards to education, the school district must comply with a new law that called for racial equality in schools throughout the state.

In 1842, the state Legislature established the city of Detroit as a single, autonomous school district and gave the district broad powers regarding the establishment of schools and educational policies. One such policy was racial segregation, which the district justified by claiming that racial tension could harm the education process. By 1868, the city had established three “colored” schools. The colored schools were primary, providing rudimentary education without grades for six years, and were often located farther away than neighborhood schools reserved for whites. Blacks were excluded from graded secondary and high schools.

In 1867, the state Legislature enacted a law calling for racial equality in schools throughout the state, and in April 1868, Joseph Workman attempted to enroll his biracial son in a Tenth Ward school, where he lived and paid school taxes. The Workman child was denied admission to the “white” school, solely due to race. In an attempt to get his child enrolled in the school, Joseph Workman brought suit in the Supreme Court for a writ of mandamus—a judicial order compelling a public officer to do his duty,

In *Workman*, the Detroit school district argued that the newly enacted state law did not apply to them because the Legislature had previously passed a law specifically providing the city broad discretionary powers in regards to education. The district also argued that as the father, Joseph Workman had no right to file for *mandamus* on behalf of his son, and that *mandamus* could not be filed because it was not shown that the child qualified for the school in question. The child was never submitted for qualification.

Justice Cooley, in the majority opinion, ruled that there were no grounds for the Detroit school district to disregard the 1867 racial equality act, that the law was intended to apply to all school districts and that it did regardless of the individual rules of those districts. Because it was passed *after* autonomy was given to school districts such as Detroit’s, the Court found that the new law would override that autonomy where the two conflicted. Simply put, the Legislature gave autonomy to school districts, and with subsequent acts could take it away. Justices Christiancy and Graves sided with Cooley, and the writ of mandamus was granted, making *Workman* an early victory for racial equality.

Justice Campbell dissented, arguing that the Legislative act applies – and was intended to apply – only to “ordinary districts” where there was no rule one way or the other about racial segregation, not to special districts such as Detroit’s where there was an applicable rule already in place. He came to this conclusion based on the wording of the section in question, as well as its placement within the rest of the act.