

# **DIGGING DEEPER: ARE MINORITY BUSINESS CASES BEING DISSEMINATED?**

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## **ABSTRACT**

Less than 1% of published business cases deal with minority owned or operated businesses. Yet, minority groups will account for a higher percentage of the population than the non-Hispanic white population by 2060 and the number of minority business companies is increasing at a faster rate than non-minority owned companies. We surveyed minority business owners and managers in an effort to explain why so few minority business cases are written and published, and what may need to be accomplished to encourage their development. We learned that 8.5% of respondents reported that they had participated in business case development. If this percentage were extrapolated to the southeast portion of our minority business database, this would indicate that over 900 cases had been developed. Why this discrepancy? We conducted a second survey of those respondents indicating case participation to learn if the cases were completed, used in the classroom, and/or published.

Subject Areas: Minority Business Cases, Survey

## 1. INTRODUCTION

As the U.S. population is growing, from 281 million in 2000 to 432 million in 2060 [27], its demographics are changing. Racial and ethnic minority groups will contribute more to the population growth than the non-Hispanic White population [27]. The U.S. Census Bureau projects that by 2010 minorities will comprise 34% of the U.S. population [28] and by 2060 minorities will comprise 53.2 percent of the population making them the dominant population [27].

As the various minority groups have grown in numbers, their impact on the U.S. economy has significantly increased. The number of minority-owned firms grew between 24% and 45% versus 10% for all U.S. firms between 1997 and 2002 [17]. Black-owned businesses totaled 1.2 million in 2002, Hispanic-owned businesses grew to 1.6 million, and Asian businesses reached 1.1 million in number [17]. In addition, Black-owned businesses reported \$92.7 billion in revenues in 2002, while Hispanic companies brought in \$226.5 billion, and Asian-owned businesses had the highest reported receipts at \$343.3 billion [17]. According to the *2002 U.S. Study of Entrepreneurial Dynamics*, sponsored by Kansas City's Kauffman Foundation, "minorities, especially African-Americans, are 50% more likely than Whites to engage in start-up business activities" [25]. Finally, according to a 2002 Babson College study African-Americans with advanced degrees, such as an MBA, are 2.6 times as likely as Whites to start a business [1].

Bates [5] has clearly shown the link between educational attainment and entrepreneurial success in the African American community. Emerging Black enterprises differ from traditional Black companies; they are typically started by better-educated owners (i.e., four or more years of college) whose initial investments and skill levels are higher than those traditionally seen. As a result these emerging firms tend to be more profitable and larger than their traditional counterparts [5]. In fact, logistic regression results by Bates indicate that a college education is strongly positively associated with firm survival among small Black owners of emerging businesses [5].

The increasing number of minorities pursuing college degrees (both undergraduate and advanced) at American colleges and universities will likely continue and play a significant role in successful minority entrepreneurship. For the 2003-2004 academic year minorities earned 25.59% of all bachelor degrees conferred [20]. Choy [10] reports that by 1999-2000 minorities already represented approximately 30% of undergraduate students. Finally, in the 2003-2004 academic year minorities represented 23.07% of all recipients of master's degrees in business.

Minorities represented 9.16% of all doctoral degrees in business conferred in 2005. The Ph.D. Project [Ph.D. Project; [www.phdproject.org](http://www.phdproject.org)] has aided in increasing the number of minority business school faculty by taking steps to attract minority students to business doctoral programs. Since the inception of the Ph.D. Project in 1994 the number of minority business school faculty increased from fewer than 300 to over 600. The impact of the program is expected to continue, given the significant number of minority students in the graduate school pipeline with high interests in academic careers. According to Pullman [23], the growth rate of minority college and university instructors over the ten year period from 1993 to 2003 was 14% for African-Americans, 45% for native Americans, 61% for Hispanics, and 63% for Asians. Thus, the number of minorities enrolled in doctoral business programs and employed in academic positions also continues to increase in significance.

Racial and ethnic minorities represent an increasing proportion of the population, new business starts, college students and graduates, college professors, business executives, employees, the U.S. GNP, and other economic indicators. This increase in the economic, social, educational, and, undoubtedly, political importance of minorities poses many timely and critical questions to college and university educators.

## **2. DIVERSITY ON CAMPUS, IN THE CLASSROOM, AND IN THE CURRICULUM**

With the growing number of minority college students, college classrooms are becoming increasingly racially diverse. The need for and benefits of classroom diversity are well researched and documented. The American Council on Education [ACE] and the American Association of University Professors [AAUP] commissioned a study [1], which surveyed over 1200 faculty using the Faculty Classroom Diversity Questionnaire, the first comprehensive survey ever conducted of the attitudes toward and experiences with racial and ethnic diversity of faculty members at America's leading research universities. Their study reports several specific benefits of classroom diversity:

- Diversity provides interactions important for developing critical thinking and leadership skills.
- A broader range of ideas and perspectives is generated and examined.
- Racial stereotypes are challenged.
- Students learn that there are similarities across different racial or ethnic groups and differences within groups.

Other studies (e.g., [15], [9], [4], [29], and [16]) support the need and benefits of classroom diversity. Taken together, these works reveal that racial and ethnic diversity in the classroom lay a foundation for comprehending diversity issues in various environments and on a broader level. The reader is directed to [19] for a detailed review of these studies.

## **3. CLASSROOM PEDAGOGIES THAT ENHANCE THE DIVERSITY CLIMATE AND MULTICULTURAL LEARNING**

Sheridan [24] and Buttner [8] point to the importance of establishing a diversity climate within the classroom and selecting pedagogies that enhance multicultural learning. Some classroom pedagogies that could be used to integrate discussions of diversity with business management concepts include: (1) discussing an article that focuses on issues confronting minority owned/operated businesses, (2) having student teams interview the owners and/or managers of minority enterprises to learn which problems may be unique to them, (3) assigning student teams to interview the management of minority firms and write mini-cases concerning important and perhaps unique problems they encountered and how they solved them, and (4) inviting the owners or managers of minority firms (individually or as members of a panel) to the classroom to speak to students and perhaps faculty about the unique business problems they face [13]. Finally, the use of business cases, long heralded as a significant research and teaching methodology (e.g., [18], [12], [6], [14], [13], [26], [30]) at the undergraduate or graduate level could provide a comprehensive pedagogical approach for studying and discussing minority business issues, diverse cultures, and their interrelationships.

### **3.1 The Case Method – An Accepted Research and Pedagogical Approach**

Business case studies represent both an accepted research approach and a prominent, widely, used, instructional pedagogy that provides many recognized and desirable academic advantages [30]. These include: active participation in the learning process; a multifunctional perspective of business; enhanced communication skills; augmented analytical reasoning; simultaneous examination of economic, behavioral, cultural, political, and ethical/legal issues; criteria selection; the generation and analysis of alternatives; and the formulation of an implementation plan [6].

Several facts to support, not only the acceptance, but also the abundant and widespread use of the case method of teaching and learning include the following:

- Harvard Business School Publishing alone sold over 6,000,000 cases in 2001; this does not include the 500,000 cases that were downloaded gratis to business instructors [11].
- There are over 30 organizations worldwide that are considered case associations or case clearing houses [14].
- There are worldwide at least 10 journals that are purebred business case journals or accept business cases for publication [14].

Prior published research has shown that less than 1% of business cases published in the most prominent university journals and online sources deal with minority business issues [13]. This in spite of the many significant issues minority businesses can face [13]. Totten [26] reviewed 214 cases that appeared from 1995 to 2002 in three refereed case publications, *Annual Advances in Business Cases*, *Business Case Journal*, and *Case Research Journal*. Of these 214 cases, only three (1.4%) “clearly involved minority-owned businesses” [26, pp. 160-61].

This dilemma of a growing importance of racial and ethnic minorities in population, business starts and revenue, college graduates and professors, etc., and yet a paucity of minority business cases provokes a series of questions:

- Why is there currently not a greater inventory of racial minority business cases?
- Have there been any efforts outside the traditional case sources to publish such cases?
- Are minority business owners and managers interested in participating in the development of business cases?
- Have a number of minority businesses already participated in case development, but perhaps the cases were simply never completed, used, or published?
- What inhibits such case development?
- What could promote the development of such cases?

One possible answer to the first question may simply be that there has not been a great pool of successful minority-owned businesses from which to draw. Another is that minority-owned businesses may not want cases to be written concerning the issues they faced. A third is that the number of racial minority professors with an interest in case writing may be small. Fourth, non-minority faculty may not have sufficient interest to develop cases concerning minority businesses. Fifth, many case writers may legitimately feel that their case(s) can be insightful to students of any racial or ethnic background. Additionally, case writers may take an interest in the new, *hot* issues and, therefore, global markets, internet-based business, and the market penetration of Eastern Europe and China may be of greater motivation. Buttner [8] offers another perspective; she writes that while minority student enrollments have been increasing, the U.S. higher education system has been slow to adapt. Finally, Pope and Thomas [22] add that U.S. colleges and universities are dominated by Eurocentric values, beliefs, norms and traditions and, thus, exhibit the values, norms, etc. of a White culture. Whatever the reasons for the scarcity of minority business cases, this remains an area of open and significant inquiry.

To address the second question – yes, there have been efforts to produce racial minority business cases. One effort is the book, *African American Enterprises* [2], which consists of eight cases and articles focused on African American businesses. The motivation for the text stemmed from an interest of several faculty at Historically Black Colleges and Universities to enhance the business school curriculum by increasing emphasis on the case method. Over 10,000 copies of the text were distributed primarily to faculty at Historically Black Colleges and Universities (HBCUs) and to institutions with a strong focus on case development and teaching, such as Harvard University and Babson College. The editor and supporters of the aforementioned casebook are attempting to raise funds in order to produce another book of African-American minority business cases. Another effort stems from Babson College, which received a grant from the Ford Motor Company to develop minority business cases, which can be integrated into the collegiate curricula throughout the U.S. [1]. These efforts, while credible and commendable, are not far reaching or are in their early stages and do not provide answers to the important, aforementioned questions.

#### 4. FIRST SURVEY RESEARCH METHODOLOGY AND INITIAL RESULTS

Efforts to answer the questions concerning the paucity of minority business cases are primarily anecdotal [13]. In an exploratory attempt to scientifically assess: (1) the interest and willingness of minority business owners and managers to participate in case development, (2) their concerns, (3) if they had ever been approached to participate in developing cases, and (4) what would make them more willing case participants, we surveyed minority business owners and managers in the southeast United States. The 2002 National Directory of Minority-Owned Business Firms (NDMOBF) database of minority businesses was used as the source of minority businesses [7]. We elected to concentrate on minority businesses located in the Southeast U.S. This portion of the entire database contained 10,882 minority businesses in the states of Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Virginia, and Washington, D.C.

We developed a stratified sample of southeastern minority businesses based on company size, which was measured by the number of employees. In the southeast portion of the NDMOBF directory 7,296 firms reported their numbers of employees. We categorized companies by size into nine categories ranging from no full time employees (only part time employees) to over 1,000. Since the “501 to 1,000” and “Over 1,000” employee categories contain fewer than 20 listings, we chose to include all of them in the survey. To assure that the survey would reflect each company size category, an equal number of companies were randomly drawn from each of the remaining “number of employee” categories. In total 2,386 businesses were drawn from this database and mailed a copy of the survey questionnaire. This represents approximately 22% of the minority-owned businesses listed in the southeast portion of the NDMOBF directory and approximately 33% of those companies who provide employee data.

The survey questionnaire is divided into three sections: (1) the demographics of the respondent (the business owner, partner, manager, etc.), (2) the characteristics of the business (business form, main activities, size, sales, etc.), and (3) the experience and attitude of the respondent regarding the development of a case concerning his/her business.

Some of the specific questions we sought to address in the survey include the following:

1. What percent of minority business owners and managers have *participated* in developing cases concerning their businesses?
2. What percent of minority business owners and managers have been *asked* to participate in developing cases concerning their businesses?

3. What concerns do minority business professionals have in participating in case development?
4. What significance does the confidentiality of business details, names, and/or financial results play in their decisions to participate in case development?
5. What demographic traits and/or business characteristics tend to indicate an interest in participating in minority business case development?
6. What can be done to encourage participation in case development?
7. Are there any differences in the responses to the aforementioned questions due to: (1) the respondents' gender, race or ethnic group, age, business experience, management position (e.g. owner vs. manager), level of education, and college major(s) and/or (2) the business structure (proprietorship, partnership, corporation, LLC, etc.), industry category (e.g., manufacturing versus service), service type (if a service business), and business size (i.e., number of employees, annual sales).

Statistical procedures such as ANOVA analysis, cross tabulations, and logistic regression analysis, were employed to examine the survey results.

A total of 267 usable survey questionnaires were returned. This constitutes 11.2% of questionnaires mailed. However, the life of small business is fleeting and volatile and 600 survey mailings were returned as "undeliverable, addressee deceased, addressee relocated, etc." Thus, the usable returns were actually 14.9% of *delivered* survey mailings. Demographic data is presented in Table 1. The entire results of the first survey are available in [19] and will not be repeated here. A follow-up to the initial survey was conducted and we explain its design and results now.

## 5. SECOND SURVEY RESEARCH DESIGN

From the initial survey, it was revealed that 8.5% of respondents reported that they have participated in case development. If all the cases in which respondents participated were completed and published in academic journals, this alone would produce 21 cases. If this case productivity was extrapolated to only the southeast portion of the NDMOBF database, this would suggest over 900 cases were developed. Yet, Totten's research spanning seven, recent years (1995-2002) of widely-known and respected case research journals reveals only 3 cases dealing with minority business issues. Why this large disparity? We offer several possible explanations:

- A disproportionately large percentage of the respondents who had participated in case development completed the survey and, thus, the reported case productivity is not representative of the minority business population as a whole.
- The respondents are interpreting "developing business cases" more broadly than intended and are not answering the question accurately.
- The case efforts were begun, but never completed.
- The cases were completed and used at only a single or very few academic institutions.
- The cases were not submitted for presentation at academic or professional conferences or publication in business case research publications (books, journals, case data bases, etc.)

**Table 1: Demographics, Business Data and Respondent Attitudes**

<b>Variable</b>	<b>Category</b>	<b>Frequency</b>	<b>Percentage</b>
Gender	Female	85	32.8
	Male	<u>174</u>	<u>67.2</u>
		259	100.0
Age	Less than 30	2	0.8
	30 to 39	31	11.8
	40 to 49	93	35.5
	50 to 59	85	32.4
	60 to 69	43	16.4
	70 to 79	7	2.7
	80 and over	<u>1</u>	<u>0.4</u>
		262	100.0
Race/Ethnicity	African American	145	54.5
	American Indian	25	9.4
	Asian/Pacific Islander	26	9.8
	Hispanic	42	15.8
	Other	25	9.4
	More than one checked	<u>3</u>	<u>1.1</u>
		266	100.0
Years of Work Experience Prior to Current Business	None	25	9.4
	Less than 2 years	13	4.9
	2 to 5 years	49	18.5
	6 to 9 years	39	14.7
	10 or more years	<u>139</u>	<u>52.5</u>
		265	100.0
Company Position	Owner	236	89.4
	Owner/Manager	8	3.0
	Manager	11	4.2
	Employee	1	0.4
	Other	<u>8</u>	<u>3.0</u>
		264	100.0
Highest Level of Education	Some High School	4	1.5
	High School Diploma	15	5.7
	Some College	57	21.6
	Undergraduate Degree	40	15.2
	Some Graduate School	31	11.7
	Graduate Degree	108	40.9
	Other	<u>9</u>	<u>3.4</u>
		264	100.0
Undergraduate Major	Business/Accounting/Economics	71	31.3
	Math./Science/Computer Science/Engineering	72	31.7
	Liberal Arts	31	13.7
	Education	9	4.0
	Nursing	2	0.9
	Other	22	9.7
	More than one checked	<u>20</u>	<u>8.8</u>
		227	100.0



**Table 1: Continued**

<b>Variable</b>	<b>Category</b>	<b>Frequency</b>	<b>Percentage</b>
Graduate Major	Business/Accounting/Economics	57	37.7
	Math./Science/Computer Science/Engineering	39	25.8
	Liberal Arts	6	4.0
	Education	10	6.6
	Nursing	2	1.3
	Other	25	16.6
	More than one checked	<u>12</u>	<u>7.9</u>
		151	100.0
Type of Business	Corporation	210	82.0
	Franchise	2	0.8
	Partnership	7	2.7
	Sole Proprietorship	29	11.3
	LLC	3	1.2
	More than one checked	<u>5</u>	<u>2.0</u>
		256	100.0
Industry	Manufacturing	15	5.7
	Construction	38	14.6
	Transportation/Communication/Utilities	8	3.1
	Finance/Investments/Real Estate	8	3.1
	Services	116	44.4
	Other	54	20.7
	More than one checked	<u>22</u>	<u>8.4</u>
		261	100.0
Service Type	Business Services	14	7.4
	Personal Services	4	2.1
	Professional Services	66	35.1
	Repair Services	6	3.2
	High Tech. Services	42	22.3
	Other	40	21.3
	More than one checked	<u>16</u>	<u>8.5</u>
		188	100.0
Number of Full Time Employees	Zero (all part time)	24	9.2
	1 to 25	184	70.8
	26 to 50	27	10.4
	51 to 75	6	2.3
	76 to 100	9	3.5
	101 to 250	7	2.7
	251 to 500	0	0.0
	501 to 1000	3	1.2
	Over 1000	<u>0</u>	<u>0.0</u>
		260	100.0

**Table 1: Continued**

<b>Variable</b>	<b>Category</b>	<b>Frequency</b>	<b>Percentage</b>
Annual Sales	Less than \$25,000	7	2.7
	\$25,000 to \$50,000	13	5.1
	\$50,000 to \$100,000	22	8.6
	\$100,000 to \$200,000	25	9.7
	\$200,000 to \$300,000	17	6.6
	\$300,000 to \$500,000	24	9.3
	Over \$500,000	147	57.2
	More than one checked	<u>2</u>	<u>0.8</u>
		257	100.0
Sell Business	Yes	49	23.7
	No	156	75.4
	Maybe	<u>2</u>	<u>1.0</u>
		207	100.0
Expand Business	Yes	200	84.7
	No	<u>36</u>	<u>15.3</u>
		236	100.0
Plan to Retire	Yes	53	26.0
	No	<u>151</u>	<u>74.0</u>
		204	100.0
Interested in Case Development?	Yes	145	58.0
	No	94	37.6
	Maybe	<u>11</u>	<u>4.4</u>
		250	100.0
More Willing If Case Information Disguised?	Yes	118	55.1
	No	90	42.1
	Maybe	<u>6</u>	<u>2.8</u>
		214	100.0
State	Alabama	15	5.8
	Arkansas	7	2.7
	Florida	53	20.5
	Georgia	35	13.5
	Kentucky	6	2.3
	Louisiana	17	6.6
	Mississippi	4	1.5
	North Carolina	24	9.3
	South Carolina	7	2.7
	Tennessee	11	4.2
	Virginia	57	22.0
	Washington, D.C.	17	6.6
	New York	1	0.4
	West Virginia	1	0.4
	More than one checked	<u>4</u>	<u>1.5</u>
		259	100.0

- The cases were submitted for conference presentations and/or publication in case research publications, but were not accepted for presentation at the conferences or for journal publication.

The latter three explanations suggest that, while additional cases exist, their existence is relatively unknown.

To address the aforementioned questions we designed a second survey for the 21 respondents who indicated participation in business case development. The survey included five questions:

1. Was the case completed?
2. To the best of your knowledge was the case ever used in a classroom setting?
3. To the best of your knowledge was the case ever presented at an academic or professional conference, meeting, or seminar?
4. To the best of your knowledge was the case ever published in a conference proceedings, book, or journal?
5. Would you be interested in further development of minority business cases?

Since we had the email addresses of 20 of the 21 respondents, emails thanking the respondents for their previous survey participation and posing the five questions to them were sent. A letter was mailed to the respondent without an email address. If no email response was forthcoming in two weeks another round of emails were sent to those not responding. Additionally, letters were sent to those respondents whose emails “bounced-back”. If this last set of emails produced no response in an additional two weeks, letters were mailed to those not responding to our emails. Finally, after an additional two-week period telephone calls were placed to those unresponsive to the previous set of survey inquiries.

## 6. RESULTS

Twelve of the 21 respondents (57% response rate) provided answers (two by email, three by letter, and seven via telephone calls) to the five research questions. Five of the initial 21 respondents could not be located for several reasons: (1) the companies no longer exist or have relocated or (2) the respondent to the initial survey has since left the company and no one presently with the company is familiar with the case. The remaining four respondents did not respond to emails, letters, or a series of telephone calls. The results are analyzed to learn the proportion of cases: (1) completed, (2) completed, but not used, (3) completed and perhaps used for instruction, but never disseminated (presented or published), and (4) completed and published. Also of interest is the reasons offered for the answers provided and what remaining interest the respondents have in future minority business case development. Table 2 illustrates the results obtained.

These data and information provide us with the following:

- Overall, cases are being completed. At least six (and perhaps seven) of the cases efforts resulted in completed cases.
- At least 50% of the reported case development efforts resulted in completed cases.
- Two-thirds of the completed cases appear to have been used in academic settings. Thus, while most completed cases reach the classroom, a completed case is no guarantee of its academic application.

- Fewer than one-third (27%) of the completed cases were presented at academic or business conferences or meetings.
- There were *no* reports of any case publications in textbooks, journals, or conference proceedings.
- Most respondents (at least 67%) indicate that they would participate in future minority business case developments. Thus, the desire to enhance the understanding of minority businesses and develop material useful to both business students and professionals remains.
- There is some confusion of what constitutes a business case. Some respondents interpret a litigation or judicial appeal process as a case.

Thus, while minority business cases are being completed, only a portion is being used in the classroom or presented at academic conferences or business meetings, and, as evidenced from this survey, *none* are being disseminated beyond a single academic institution.

## 7. CONCLUSIONS

We had no preconceived notion of how many minority business cases have been written, used, and disseminated. Apparently they do exist, and about two-thirds of completed cases are, in fact, being used. According to our results about one-half are being presented at academic or business conference/meetings. However, we have no evidence that any cases are disseminated beyond the reach of a single institution or published for general use. Thus, it appears, the scarcity of minority business cases is not due to the lack of their completions, (although more would help), but the lack of efforts to disseminate them. We reiterate one suggestion we made to minority business case participants at the completion of the first survey – make certain the case effort reaches the maximum student audience possible by insisting that the case be presented at a business or academic conference and, better yet, published in a textbook or reputable business journal.

Thus, these findings, although based on limited data and information, do provide some insights into the paucity of *published and available* minority business cases. More minority business cases exist than we initially realized, but they are apparently (and perhaps deliberately) not being disseminated to the general academic audience.<sup>1</sup> To explore the reasons behind these decisions not to popularize these minority business cases may require a future survey of *case writers*. Finally, these results further support initiatives such as that undertaken by Babson College and the Ford Motor Company to financially support the development and dissemination of minority business cases.

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<sup>1</sup> It may be understandable that an academic institution would delay the publication of a case for one or several years, so that it may use that case for its own educational purposes. However, it would be beneficial to present and/or publish the case for general use, once the case is no longer used at the initial institution.

Table 2

**Results from the Respondents Indicating Participation in Minority Business Case Development**

<b><u>Respondent</u></b>	<b><u>Case Completed</u></b>	<b><u>Case Used in Instruction</u></b>	<b><u>Case Presented At Conference or Meeting</u></b>	<b><u>Case Published</u></b>	<b><u>Willing to Participate in Minority Business Cases</u></b>
1	Yes	No	No	No	Yes
2	Yes	Yes	Yes <sup>1</sup>	No	Yes
3	Not certain	Yes <sup>2</sup>	No	No	Yes
4	Yes	Unknown	No	No	Yes
5	Yes <sup>3</sup>	Yes	Yes <sup>4</sup>	No	Yes
6	<sup>5</sup>	--	--	--	Yes
7	Yes <sup>6</sup>	No	No	No	Yes <sup>7</sup>
8	<sup>8</sup>	--	--	--	--
9	No <sup>9</sup>	No	No	No	Yes
10	<sup>8</sup>	--	--	--	--
11	Yes	Yes	Yes	No	--
12	No	Unknown	Unknown	Unknown	No

<sup>1</sup> Presented at an executive development seminar at Dartmouth College.

<sup>2</sup> Believed used at the University of Michigan.

<sup>3</sup> Used only internally within the company.

<sup>4</sup> At a business meeting.

<sup>5</sup> Did not really comprehend what a minority business case was. Interpreted a case as a litigation or appeals process.

<sup>6</sup> Case was really a report completed by a graduate student group as part of a class assignment for extension service of a business school. The report pointed out areas the business could improve.

<sup>7</sup> Provided the case writers were committed to the project and performed effectively.

<sup>8</sup> Could not recall the case.

<sup>9</sup> Too time consuming

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