

Summer 2021

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Recommended Citation

Julia T. Crawford, *Imposter Syndrome for Women in Male Dominated Careers*, 32 *Hastings Women's L.J.* 26 (2020).

Available at: <https://repository.uchastings.edu/hwj/vol32/iss2/3>

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Imposter Syndrome for Women in Male Dominated Careers

Julia T. Crawford

I. INTRODUCTION

“There isn’t a country on earth where women have achieved true equality, and the barriers they face look different in different places. But no matter where you are in the world, understanding these barriers is the first step in dismantling them—and that requires making a concerted effort to gather data about women and their lives.”

—Melinda Gates¹

“I am a young software engineer in a large company, where I believe the ratio is probably somewhere around 10-20% female. For almost a full year being the only woman on my immediate team, I am [now] one of two women.

I have experienced imposter syndrome; I believe that a lot of it comes from not necessarily seeing others like you in leadership, senior positions, manager roles, etc., which leads you to not see yourself having potential for those roles. Although I enjoy my work and I believe that I am good at it (coming both from external praise and my own standards), I do sometimes feel that I am just so different than all of my peers.

I find that instances of imposter syndrome come out in little ‘tics,’ such as often saying things like ‘well, I’m no expert at this, but here’s what I know,’ or apologizing a lot even if it’s unwarranted, or second-guessing myself on high-stress things such as our on-call rotation. It’s the day-to-day experience of knowing that I’m inherently not really suited to relate well to my coworkers. For instance, it’s tough when a group of them go to lunch together without inviting me, it’s tough when I hear friends in other industries who have lots of female colleagues turned friends, and it’s tough just to think that none of my colleagues really truly get what being a woman in tech can be like.

1. *What Is the Most Important Challenge That Women Face Today?* NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 32.

At the same time, I've also used my other-ness to stand out and improve myself; I believe that as a woman and as one of the only women, I possess a level of empathy and consideration for others' comfort/feelings that some of my team members may not have, which has put me in very early consideration for a managerial path in my career. My advice for women in male dominated careers is to leverage your strengths, both as a woman and just in general. Find managers and leaders who don't really give a shit whether you're a woman or a man, just whether you can code/complete projects/deliver the results necessary. I would much rather be just a plain good engineer than a good 'woman' engineer, which in my opinion reduces me down to my gender, something I really rarely consciously think about day to day at work (why would I think about that when there are already a million things on my plate to be done!?). Also, take advantage of any groups, perks, programs, etc. that your company has in place. At my company, we have weekly lunches with food and speakers, quarterly events with executives, internal email lists, and even book clubs and yoga gatherings. (They're designed to help you! Use them!)"

—Anonymous²

While experiences of women in male-dominated careers are multifaceted and vary based on the individual, a sense of disparity and otherness remains consistent across the board. The story quoted above constructs an image of how society's expectations shape women's own perception of how they "should" act. Psychologists explain that the "imposter syndrome" magnified by these societal influences has significant effects on the human psyche, especially for women in male-dominated careers where psychological effects can lead to anxiety, depression, lowered self-esteem, and self-handicapping behaviors. This note argues that current interpretations of anti-discrimination laws, especially Title VII, are lacking in protections against the more subtle modern forms of discrimination, and that the Americans with Disabilities Act ("ADA") should provide protections and accommodations for imposter syndrome's disabling effects to remedy the systemic damages our society created and continues to create.

This note will methodically go through the science behind imposter syndrome, how imposter syndrome affects women in male-dominated careers, and how the current legal landscape might be equipped (or ill-

2. Telephone Interview with Anonymous, Software Engineer, Major Tech Company (2020) (responding to the question "Have you experienced imposter syndrome?") A few months post interview, interviewee returned to being the sole woman in her division). They requested to remain anonymous due to fear of backlash.

equipped) to remedy these disparities. Part II explains lack of fit, stereotype threat, and imposter syndrome, delving into the research underlying these theories. Then, Part III dives into how these theories directly impact women in male dominated careers, pulling from studies on and stories from those directly affected. Part IV explores how existing anti-discrimination laws, notably the ADA and Title VII of the Civil Rights Act of 1964, could play a meaningful role in combatting imposter syndrome and in remedying its effects. Part V then discusses how employers can help mediate the negative effects of imposter syndrome and fill the gaps in the law by offering possible solutions to encourage positive systematic change for all genders and workplaces. Part V concludes with a summary of the issues and closing remarks.

Although, due to limited research,³ this Note focuses only on the prevalence of imposter syndrome for women in the gender-binary sense, the concept of intersectionality is important to keep at the forefront of one's mind to fully grasp the impact the issues discussed in this Note have on our society at large. "Intersectionality," i.e., individuals who identify with two or more marginalized groups,⁴ recognizes that social identities are not additive but multiplicative.⁵ In other words, socially constructed identities

3. Quote from gender non-conforming person informing myself of the best route to take in being inclusive of noncisgendered people when there is limited to no research available: "Since nearly all research is done in an assumed sex- and gender-binary, modern scholars cannot really be personally faulted for excluding those for whom they have no data. When transgender and nonbinary and gender-nonconforming people live our lives and proclaim our truths, we defy the long-standing structures of society that would seek to reduce us (and indeed all people) to datapoints and numbers. So, because of cisnormative precedent, researchers have not historically bothered to include trans/nonbinary/gender-nonconforming people in their work unless they are studying us specifically; and this gives additional momentum to a vicious cycle of social exclusion that helps to partially explain those datapoints we do have for trans/nb/gnc people, particularly our astronomically greater incidence of suicidality, or murder at the hands of our cisgender peers. The way forward for scholars and researchers who seek to be inclusive of our stories is surely a difficult one, that requires nothing less than a total uprooting of the established norms for qualitative and quantitative data collection, in concert with a broad social acceptance that would allow trans/nb/gnc people to feel safe in disclosing this most basic demographic information in the first place; presently, both these forces work together to keep us invisible to academia, but they need not continue to exist for all eternity. This paradigm shift in the direction of compassion and inclusion is starting to happen, and I, for one, am hopeful that mine is the generation that will integrate it as a normality."

4. Callie Womble Edwards, *Overcoming Imposter Syndrome and Stereotype Threat: Reconceptualizing the Definition of a Scholar*, 1 TABOO 18, 20 (2019), https://search.proquest.com/docview/2307370579?rfr_id=info%3Axri%2Fsid%3A primo.

5. *Id.*

can intersect and overlap, creating multilayered experiences with identity-based oppression.⁶ For example, Kimberlé Crenshaw, leading critical race theorist and legal scholar who coined the term “intersectionality,” explains that the experience of Black women cannot be understood by looking at traditional boundaries of race and gender.⁷ She states that the intersection of racism and sexism cannot be wholly captured by looking at the dimensions of race or gender separately, and these traditional boundaries do not subsume the true experiences of those who fall into multiple marginalized groups.⁸ However, imposter syndrome and related theories, when analyzed under a singular lens of sex or race, do not just help people understand emotion and behavior of a single group; as Callie Edwards explains, they can also provide a practical lens into one’s own intersectional experience (in Edwards’ case, life as a Black woman in a white male dominated university) even if that image is not the complete intersectional picture.⁹ Another marginalized individual, who has requested to remain anonymous due to fear of backlash, gave a description of their own intersectional experience with imposter syndrome, supplying a good example:

“As for my own personal experience: I am a white, queer, trans-nonbinary, young adult and the social fact of these inhabited and inherited identities have shaped my workplace experience. What particularly comes to mind is the immense additional difficulty I have experienced in finding work. I have all the struggles of many other young adults fresh out of college—in a job market that seems at times incredibly scarce on entry-level positions in long-term careers—with the addition of finding a workplace that is affirming of my safety needs in a world where even an employer’s profession of being ‘equal-opportunity’ cannot alleviate my scrutiny and unease. This has meant making compromises to my health and well-being; for example, at one recent job I held, to prioritize my safety in a very masculine work environment, I found myself retreating back into the closet whenever I clocked in, enduring the microaggressions and mental anguish that comes with that until I clocked out, each and every workday. These compromises for sure compounded into a very visceral feeling of unbelonging that I relate to imposter syndrome, and, over time, a sense of hopelessness. . . . I do hope, though, that sharing some of my experience here will help uncover a bit of this largely-ignored corner of human

6. Edwards, *supra* note 4, at 20.

7. Kimberlé Crenshaw, *Mapping the Margins: Intersectionality, Identity Politics, and Violence against Women of Color*, 43 STANFORD L. REV. 1241, 1244 (1991).

8. *Id.* at 1241-1299.

9. Edwards, *supra* note 4, at 20.

experience.”¹⁰

The anonymous source's experience shows how people experience these phenomena in all walks of life. The individual admits they had difficulty definitively labeling the symptoms and feelings they experienced,¹¹ describing it as “a very insidious way that the infrastructure of the working world at large keeps a sort of glass ceiling over me despite the working capability that I know I have.”¹² But when challenged by a broad definition of imposter syndrome that includes conforming to fit one's surroundings as a symptom of the phenomenon,¹³ the source conceded that their experience likely matches up with imposter syndrome.¹⁴ The anonymous source explained that initially they believed their experiences with imposter syndrome were more closely related to age or race than gender, but admitted they had difficulty parsing all of this out at times.¹⁵ Though this individual's experience might be anecdotal, it confirms the importance of intersectionality in truly understanding each individual's own experience.

During the many other conversations I had when researching this Note, interviewees agreed to the sentiment that this is not an easy conversation to have but, coming from a place of thinking that someone else out there may be experiencing these same feelings, the possibility that sharing their stories might help someone else understand what is happening to them, makes it worth it.¹⁶ Therefore, although this Note is limited to exploring imposter syndrome in “women”—in the binary sense of the word—pursuing male dominated careers, all marginalized genders, races, cultures, sexual orientations, religions, and identities can be provided a lens that helps them and those around them gain an understanding of these psychological phenomena they experience.¹⁷

10. Telephone Interview with Trans-nonbinary Individual (2020) (responding to the question “Have you experienced imposter syndrome? And how?”). They requested to remain anonymous due to fear of backlash.

11. *Id.* (Reference of this individual will be using the nonbinary they/their pronouns as the anonymous source prefers).

12. *Id.*

13. *Id.*

14. *Id.*

15. *Id.*

16. Telephone Interview with a trans-nonbinary individual, *supra* note 10.

17. For information that references white women and white men, the footnote will include the statistics for people of color. The reason for this is not to downplay those numbers, but to narrow the thesis focus to strengthen the argument as a whole. The inclusion of the information in the footnotes is important to stress intersectionality.

II. IMPOSTER SYNDROME AND THE PSYCHOLOGY BEHIND IT ALL

A. Lack of Fit

“The media portrayal of women as objects. It would be a lot easier to move forward with where we need to go if the message from mainstream media supported women’s roles as the keepers of wisdom and cooperation.”

—Jonatha Giddens¹⁸

The “lack of fit” model is important for understanding how expectations and stigma impact people in society. Psychologists define lack of fit as a “perceived incongruity,”¹⁹ i.e., the matchup between the perception of attributes an individual brings to the work setting and the perception of the job’s requirements in terms of skills and orientation.²⁰ Therefore, if the two categories match well and are considered a good fit, then success is expected; but if the fit does not match up well, failure is expected.²¹ That incongruity between the attributes of a person and the perceived nature of the requirements for a job may result in occupational gender, race, and attractiveness biases.²² Thus, for example, women are less likely to be considered “good fits” than identically qualified men for a managerial job, which is generally perceived as a “masculine” job.²³

Consider the following visual example: When a person sees something with four legs, a top, and a back rest, she automatically deduces it is a chair without the need to do a full evaluation of the object, even if the color, shape, or material changes. This automatic deduction phenomenon occurs because of the “blueprint” in a person’s mind allowing for these split-second conjectures of the surrounding world. Society heavily influences these blueprints by controlling what people see, hear, etc. A chair having a blueprint of four legs, a seat, and a backrest results from society building and selling the majority of chairs in this way. However, if three-legged chairs became commonplace, our societal blueprint would adapt to match that image.

18. *What is the most important change that needs to happen for women in the next 10 years?* NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 108.

19. Madeline E. Heilman, *Sex Discrimination and the Affirmative Action Remedy: The Role of Sex Stereotypes*, 16 J. BUS. ETHICS 877, 881 (1997).

20. Madeline E. Heilman, *Gender Stereotypes and Workplace Bias*, 32 RES. ORGANIZATIONAL BEHAV. 113, 116 (2012).

21. Heilman, *supra* note 19, at 881.

22. *Id.*

23. *Id.*

Once these socially constructed expectations for categories are in place, they create a predisposition toward negativity or positivity that colors subsequent perceptions and judgements.²⁴ The expectations serve as a filter for how people act, associate, interpret, and recall information.²⁵ With regards to the workplace, expectations filter what information is associated with an individual, affect how that information is interpreted, and influence what information is remembered and therefore recalled when making critical decisions.²⁶ Because people have a tendency to perpetuate and confirm fit-derived performance expectations, those expectations play a key role in workplace evaluation processes (i.e. hiring, firing, promoting, progress reports, etc.), which in turn perpetuates discrimination and stereotyping.²⁷

Psychologists have pointed to the perceived lack of person-job fit (i.e., an expectation that women are ill-equipped to handle male gender-typed jobs) to explain the occurrence of gender bias against women in organizational decisions about managers/higher level employees.²⁸ The tenacity and power that performance expectations can have over how people process information suggests that fit-derived expectations have important and broad-ranging consequences for how women are treated in the workplace,²⁹ including in hiring, starting salary, job placement decisions, opportunities for skill development, pay raises, promotions, and biased performance evaluations.³⁰ Additionally, selective attention, interpretation, and recall can negatively affect how one assesses women's performance competence. Consequently, these negative assessments thwart women's opportunities for advancement and attainment of organizational

24. Heilman, *supra* note 20, at 116.

25. *Id.*

26. *Id.* at 117.

27. *Id.*

28. *Id.*

29. Heilman, *supra* note 20, at 117.

30. *Id.* (stating "There is ample evidence that there are inequities in the recruitment ... selection ... evaluation ... and promotion ... of women. There also is strong evidence verifying the lack of fit formulation, demonstrating that the greater the perceived lack of fit between a woman and a job, the more negative the evaluative outcomes they produce. In these investigations either the degree to which stereotypes about women are activated or the degree to which the position in question is seen as male gender-typed is varied. That is, the perceived incongruity between stereotypically based attributes ascribed to women (e.g., kind, caring, and relationship-oriented) and the attributes ascribed to men (e.g., tough, forceful, and achievement-oriented) believed to be necessary for success at male gender-typed jobs, is thought to give rise to expectations that women will perform poorly in these positions, and the greater the perceived lack of fit, the more negative the expectations....")

rewards.³¹ It follows that the degree of perceived lack of fit between the woman's attributes and the presumed nature of the job requirements, and the negative expectations it produces, correlate to the extent of gender bias ultimately displayed.³² Therefore, the negative expectations resulting from perceptions of lack of fit detrimentally affect how women are regarded and how their work is evaluated when they are in traditionally male jobs.³³

B. Stereotype Threat

"The disease to please. It happens when we are not raised to know our own value and our own worth."

—Oprah Winfrey³⁴

"Stereotype threat" describes the vulnerability, pressure, or concern a member of a stigmatized group experiences when faced with the possibility of confirming or being judged by a negative stereotype that exists about one's group.³⁵ Stereotype threat is a situational experience and has been proven to impact how members of a stigmatized group perform.³⁶ For example, many studies have shown that stereotype threat interferes with performance on standardized tests, such as math and engineering exams for women and verbal skills for people of color.³⁷ Therefore, when members of a stigmatized group are in a setting where negative stereotypes may provide a lens for interpreting their behavior, the risk of being judged in consideration of those stereotypes can elicit a disruptive state that undercuts performance and aspirations in that sphere.³⁸

31. Heilman, *supra* note 20, at 118.

32. *Id.*

33. *Id.*

34. *What is the greatest hurdle you've overcome?* NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 46.

35. Aitao Lu et al., *Anxiety and Mind Wandering as Independent Consequences of Stereotype Threat*, 43 SOC. BEHAV. AND PERSONALITY 537, 538 (2015), <https://search.proquest.com/docview/1721707661/fulltext/ADCF6B388087443APQ/1?accountid=33497>; Amy Bell et al., *Stereotype threat and women's performance in engineering*, 92 J. ENGINEERING EDUC. 307, 307 (Oct. 2003), <https://search.proquest.com/docview/217947588/fulltext/204D09C915CB431BPQ/1?accountid=33497>

36. Lu et al., *supra* note 35, at 538; Bell et al., *supra* note 35, at 307.

37. Claude Steele, *Stereotype Threat and the Intellectual Test Performance of African Americans*, 69 J. PERSONALITY AND SOC. PSYCHOL. 797, 797 (1995), <https://psycnet.apa.org/fulltext/1996-12938-001.html>; Toni Schmader et al., *Converging Evidence That Stereotype Threat Reduces Working Memory Capacity*, 85 J. PERSONALITY AND SOC. PSYCHOL. 440, 446 (2003), <https://psycnet.apa.org/fulltext/2003-07329-004.pdf>.

38. Steven J. Spencer et al., *Stereotype Threat*, 67 ANN. REV. PSYCHOL. 415 (2016), <https://www.annualreviews.org/doi/pdf/10.1146/annurev-psych-073115-103235>; Toni

Current research shows that tests on diagnostic ability, for which stereotype threat is high, cause people in these stereotyped groups to underperform.³⁹ However, when stereotype threat is reduced, e.g. by characterizing the test as non-diagnostic, or one not expected to produce gender differences, people in stigmatized groups tend to perform just as well as those outside of the stigmatized group.⁴⁰ For instance, in one study, scientists varied the stereotype vulnerability of participants by varying whether or not their performance was seemingly diagnostic of ability and, therefore, varying participants' supposed risk of fulfilling their group's stereotype regarding ability.⁴¹ The performance of participants in stigmatized groups mirrored the extent they felt stereotype vulnerability, i.e., they underperformed in relation to their non-stereotyped counterparts in the ability-diagnostic condition, but not in the non-diagnostic condition.⁴² These studies also found that individuals primed on their group status, i.e. by answering questions about their race or gender before taking the test, performed worse than those not primed by their group status, regardless of whether or not the test was described as ability-diagnostic.⁴³ These phenomena suggest that people within these groups unconsciously activate stereotype threat and become hindered by its effects due to the saliency of these group stereotypes in society.⁴⁴

The psychological experience of stereotype threat results in deteriorating one's motivation, performance, and engagement in the stigma-relevant domain, all of which can ultimately exacerbate workplace gender inequality.⁴⁵ Understanding women's psychological experiences and factors that mitigate stereotype threat is essential to enhancing women's work satisfaction, furthering the goal of gender equilibrium in the workplace, ensuring women's professional motivation and engagement, and increasing overall work performance for all employees.⁴⁶ Researchers have confirmed that invoking group memberships associated with stereotypes can harm performance on a variety of tasks,⁴⁷ resulting in

Schmader et al., *An Integrated Process Model of Stereotype Threat Effects on Performance*, 115 PSYCHOL. REV. 336 (2008), <https://psycnet.apa.org/fulltext/2008-04236-003.html>.

39. Lu et al., *supra* note 35, at 538.

40. *Id.* at 543.

41. Steele, *supra* note 37, at 797; Schmader et al., *supra* note 37, at 440.

42. Steele, *supra* note 37, at 808; Schmader et al., *supra* note 37, at 440.

43. Steele, *supra* note 37; Schmader et al., *supra* note 37, at 440.

44. Steele, *supra* note 37; Schmader et al., *supra* note 37.

45. Clarissa I. Cortland et al., *Stereotype Threat and Women's Work Satisfaction: The Importance of Role Models*, 7 ARCHIVES OF SCIENTIFIC PSYCHOL. 81, 82 (2019), <http://dx.doi.org/10.3886/ICPSR37189.v1>.

46. *Id.*

47. Lu et al., *supra* note 35, at 538.

underachievement in mathematics and science,⁴⁸ self-handicapping strategies such as reduced practice time and effort spent on a task,⁴⁹ and a reduced sense of belonging to the stereotyped domain.⁵⁰ Further, researchers have indicated that factors such as distraction,⁵¹ narrowed attention,⁵² withdrawal of effort,⁵³ reduced working memory capacity,⁵⁴ increased anxiety,⁵⁵ and mind wandering⁵⁶ can all occur under stereotype threat and contribute to reduced performance.⁵⁷

C. Imposter Syndrome

“Patriarchy is a huge one. Racism. And also—and I think a by-product of both of those things—what people call imposter syndrome. Right? Where you can’t imagine why anyone would think that you could be a leader or consider you to be a leader.”

—Alicia Garza⁵⁸

Imposter Syndrome, coined by psychologists Pauline R. Clance and Suzanne A. Imes in 1978, describes the experience of an individual who doubts that her achievements are the result of her own genuine competence, and instead attributes those achievements to luck, charm, attractiveness, hard work, or the manipulation of other people’s impressions, causing her to feel as though she does not “deserve” what she has achieved.⁵⁹ In other words, when a woman fears she is living as an imposter and believes men

48. Lu et al., *supra* note 35, at 538.

49. *Id.*

50. *Id.*

51. *Id.*

52. *Id.*

53. *Id.*

54. Lu et al., *supra* note 35.

55. *Id.*

56. *Id.*

57. *Id.*

58. *What is the greatest hurdle you have overcome?* NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 48.

59. GABRIELLA NOBILI & SOPHIA LAO, A STUDY ON THE MENTAL HEALTH OF WOMEN IN THE CSSE DEPARTMENT OF CALIFORNIA POLYTECHNIC STATE UNIVERSITY 4 (Comput. Sci. Dep’t Cal. Polytechnic State Univ., 2019) <https://digitalcommons.calpoly.edu/cgi/viewcontent.cgi?article=1181&context=cscsp>; Shaloo Tiwari, *Signs You Suffer From Impostor Syndrome at Work*, THEHEALTHSITE.COM (Oct. 31, 2017), <https://www.thehealthsite.com/diseases-conditions/signs-that-you-may-be-experiencing-impostor-syndrome-at-work-w1017-529171/>; RACHEL IVIE ET AL., WOMEN’S AND MEN’S CAREER CHOICES IN ASTRONOMY AND ASTROPHYSICS 020109-3 (American Institute of Physics, 2016), <https://journals.aps.org/prper/pdf/10.1103/PhysRevPhysEducRes.12.020109>.

around her with similar achievements are more deserving, she ends up questioning the validity of her accomplishments.⁶⁰ In their trailblazing work, Clance and Imes assert that women who experience imposter syndrome persistently believe that they are not intelligent and have conned those who think otherwise—despite their actual academic and professional achievements.⁶¹ Put plainly, those suffering from imposter syndrome do not feel worthy of the praise they receive due to their academic or professional accomplishments and observe these successes as overvaluations of their talents.⁶²

Imposter syndrome itself is not yet considered a mental disorder.⁶³ The Diagnostic and Statistical Manual of Mental Disorders (DSM) does not even recognize imposter syndrome as an individual condition. However, the *effects* of imposter syndrome include multiple DSM-recognized conditions. For example, imposter syndrome can hamper one's ability to appreciate themselves for their success, which in turn can manifest itself in a manner which mirrors aspects of many mental conditions. Specifically, researchers have found that imposter syndrome can cause depression, anxiety, lack of self-confidence, frustration at an inability to meet self-imposed standards, neuroticism, maladaptive personality, global negative affect, shame, insomnia, social disfunctions, and psychosomatic symptoms.⁶⁴ Extensive studies all show that imposter syndrome has a positive (i.e. confirmed correlation where two points of data move in the same direction) and significant (i.e. of large enough data and correlation to not be from chance) association with all aspects of mental health.⁶⁵ Scholar Niayesh Safaryazdi found that self-esteem and imposter syndrome had a negative correlation, meaning that as indicators of imposter syndrome increased, the subject's self-esteem decreased.⁶⁶ This conclusion is consistent with research on neuroticism.⁶⁷

A major characteristic of imposter syndrome is the ascription of success to considerations outside the individual's control and/or diminishing those successes by attributing them to "hard work," while at

60. NOBILI & LAO, *supra* note 59; *Imposter Syndrome and Why You're Doing Fine*, THE LAWRENTIAN (May 2019), https://search.proquest.com/docview/2226621923?rft_id=info%3Axri%2Fsid%3Aprimo

61. Edwards, *supra* note 4.

62. *Id.*

63. Tiwari, *supra* note 59.

64. Niayesh Safaryazdi, *Surveying the Relationship between Resiliency and Imposter Syndrome*, 4 INTERNATIONAL J. OF REVIEW IN LIFE SCIENCES 36, 38-39 (2015).

65. *Id.*

66. *Id.*

67. *Id.*

the same time ascribing the success of others to their actual skill, knowledge or natural talents.⁶⁸ Moreover, ‘imposters’ can fear that others will find out they are not really capable after all,⁶⁹ or that they ultimately will not live up to others’ expectations.⁷⁰ Therefore, instead of seeing their failures and mistakes as constructive performance feedback, those suffering from imposter syndrome deeply personalize them, showing sensitivity to assessment and fear of evaluation.⁷¹

Further, context can play a vital role in exacerbating imposter syndrome, because as people look to determine what characteristics make an authentic professional, they tend to compare themselves to those deemed authenticated.⁷² When this comparison happens, those who suffer from imposter syndrome—especially women and minority groups—notice differences and begin to feel like frauds.⁷³ The “lack of fit” model explains how these comparisons work and the impact they have, not only on the possible treatment of people with imposter syndrome, but also on how people with imposter syndrome perceive themselves, recall and interpret events or successes, and establish expectations of themselves and others.⁷⁴

Accordingly, imposter syndrome could be described as the internalization of society’s expectations causing someone to gaslight themselves—or an internal experience of “intellectual malversation.”⁷⁵ It can cause thoughts of doubt like, “I don’t have enough experience for that internship, I shouldn’t even apply” and “[e]veryone else seemed to do well so I guess I’m just not smart.”⁷⁶ Other common thoughts include, “I must not fail,” i.e., putting a huge amount of pressure to do well on oneself in order to stay “undiscovered” as a fraud, and “[s]uccess is no big deal,” i.e., the tendency to downplay one’s own accomplishments to mask her underlying fear of failure going forward.⁷⁷ Paradoxically, success brings the

68. IVIE ET AL., *supra* note 59, at 020109-3.

69. *Id.*

70. Rose O. Sherman, *Imposter Syndrome: When You Feel Like You’re Faking It*, 8 AM. NURSE TODAY 57, 57-58 (2013), https://www.researchgate.net/profile/Rose_Sherman/publication/256475007_Sherman_RO_2013_Imposter_Syndrome_American_Nurse_Today_85_57-58/links/0c960522f53cd9647f000000.pdf

71. Sherman, *supra* note 70; Gill Corkindale, *Managing Yourself: Overcoming Imposter Syndrome*, HARV. BUS. REVIEW, (May 7, 2008) <https://hbr.org/2008/05/overcoming-imposter-syndrome>.

72. Edwards, *supra* note 4.

73. *Id.*

74. *Infra* II A.

75. *Imposter Syndrome and Why You’re Doing Fine*, *supra* note 60.

76. *Id.*

77. Corkindale, *supra* note 71.

added pressure of responsibility and visibility, which leads to an inability to accept compliments and enjoy the success.⁷⁸ Those experiencing imposter syndrome thus might attribute their triumphs to something other than a personal accomplishment: the task being easy, having support, luck, good timing, or having fooled others.⁷⁹ These common thoughts and attributions generally have no real basis and show one's manipulation of their own perspective to fit an imposturous reality.⁸⁰

The fraudulent feeling that imposters experience activates a dangerous cycle where people suffering from imposter syndrome attempt to forecast others' perceptions of them and then engage in behaviors based on those assumptions.⁸¹ Imposters have a sense of incapability that persists despite evidence of success and of how others perceive or evaluate them to be, overriding any sentiments of triumph or external evidence of their competence.⁸² Although in small doses feelings of inadequacy might benefit people by reminding them to persevere and continue enhancing their own competency, those with imposter syndrome experience a level of self-doubt so severe that it causes them harm.⁸³ In fact, studies have shown that students with imposter syndrome are more likely to leave their field as a result of their imposter syndrome.⁸⁴ Further, researchers have found that these feelings of inadequacy, lack of merit, and being emotional impact individuals' ability to operate at the highest level.⁸⁵ For example, in one study residents at a hospital experiencing imposter syndrome had such high psychological distress that they did not believe they were ready to treat patients after graduation.⁸⁶

Psychologists have observed various patterns of behavior that women with imposter syndrome present that can exacerbate the phenomenon:⁸⁷ One is "undue diligence"—i.e., women working harder and longer hours than their male counterparts so as to prevent others from realizing their perceived imposter status.⁸⁸ Working towards more praise and success, the

78. Corkindale, *supra* note 71.

79. *Id.*

80. *Imposter Syndrome and Why You're Doing Fine*, *supra* note 60.

81. *Id.*

82. Corkindale, *supra* note 71.

83. Sherman, *supra* note 70; Adam Persky, *Intellectual Self-doubt and How to Get Out of It*, 82 AMERICAN J. OF PHARMACEUTICAL EDUCATION 86 (2018), <https://search.proquest.com/docview/2051218511/fulltextPDF/8549FBAD4A234739PQ/1?accountid=33497>.

84. IVIE ET AL., *supra* note 59.

85. Edwards, *supra* note 4.

86. *Id.*

87. *Id.*

88. *Id.*; Tiwari, *supra* note 59.

imposturous feelings inside them and fears of being caught only grow in potency—frequently inducing early burn out.⁸⁹ After receiving an achievement-related task, imposters tend to overprepare or procrastinate in an effort to avoid possible failure, and then attribute any success to effort or luck.⁹⁰

Another pattern is engaging in intellectual inauthenticity—when women conceal their genuine ideas and opinions, choosing instead to voice only those that they believe will receive positive responses from their audience.⁹¹ When people experiencing imposter syndrome fear failure or underappreciate themselves, they attempt to give people they want to please the answers that they believe these people want to hear and act as “people pleasers.”⁹² This makes them feel even more artificial, forming a self-deprecating cycle.⁹³ Imposter syndrome also can cause women to engage in “charm” behavior, i.e. seeking to gain their superiors’ approval by being well-liked and considered intellectually gifted.⁹⁴

Finally, women who suffer from imposter syndrome often avoid displays of confidence: cognizant of the reality that society tends to reject successful women, they often consciously present themselves as timid,⁹⁵ i.e. try to appear as though they fit into society’s stringent gender roles or what some scholars call “tightrope bias.”⁹⁶ People experiencing imposter syndrome use self-handicapping as a strategy to reduce the consequences of evaluative situations, which explains why some women with imposter syndrome procrastinate and appear to show low levels of conscientiousness.⁹⁷ It allows those with imposter syndrome to avoid negative evaluations by providing them with an excuse that the possible failure was due to the handicap and not themselves.⁹⁸ This strategy is a product of imposter behaviors that result in individuals with unstable senses of self-worth and that heavily depend on others’ feedback to maintain a sense of self.⁹⁹ Self-handicapping affirms the fear of success, sensitivity of evaluations, and lack of self-confidence found in those with imposter

89. Tiwari, *supra* note 59.

90. Safaryazdi, *supra* note 64, at 38.

91. Edwards, *supra* note 4.

92. *Id.*

93. *Id.*

94. *Id.*

95. *Id.*

96. JOAN C. WILLIAMS ET AL., WHAT WORKS FOR WOMEN AT WORK: FOUR PATTERNS WORKING WOMEN NEED TO KNOW (2014).

97. Safaryazdi, *supra* note 64, at 39-40.

98. *Id.*

99. *Id.*

syndrome experience.¹⁰⁰

Studies have also shown that imposter syndrome causes individuals to have stronger emotional needs for acceptance and emotional support, but they are often unable to satisfy these needs due to fear of communication with others.¹⁰¹ People who suffer from imposter syndrome tend to be more introverted,¹⁰² often falling into a conservation mode, attempting to shield themselves from others by separating themselves all together.¹⁰³

Those who suffer from imposter syndrome also tend to be intelligent, high achievers such as academics, pharmacists, doctors, lawyers, engineers, accountants, and professional students.¹⁰⁴ This correlation of high achievers and highly successful people to imposter syndrome suggests that imposter syndrome is not necessarily synonymous with low self-esteem or lack of self-confidence.¹⁰⁵ Further, imposter syndrome is most common among persons for whom success came suddenly: first-generation professionals, members of minority groups, those taking on a new position, and students. Women who become leaders tend to experience imposter syndrome most commonly.¹⁰⁶ In many cases, researchers have traced imposter syndrome back to early family or school dynamics, where a child received inconsistent messages about her capability and individual achievements.¹⁰⁷ Some researchers have even said imposter syndrome has its roots in the labels parents attribute to certain family members, i.e. one child being labeled “intelligent” and another being labeled “sensitive.”¹⁰⁸ Another theory suggests that parents may “program” superiority in their children, causing the parents and child to believe the child is superior or perfect by copiously supporting them.¹⁰⁹

Additionally, researchers have seen a link between imposter syndrome and perfectionism, a trait especially found in women in academia; those who suffer from imposter syndrome are more likely to constantly compare themselves to others.¹¹⁰ This type of outlook is easily and unconsciously undertaken on college campuses, particularly in times of increased class

100. Safaryazdi, *supra* note 64.

101. Jasmine Vergauwe et al., *Fear of Being Exposed: The Trait-Relatedness of the Impostor Phenomenon and its Relevance in the Work Context*, 30 J BUSINESS PSYCHOL. 565 (2015).

102. *See generally* Safaryazdi, *supra* note 64.

103. *Id.*

104. *See Id.* at 39; Persky, *supra* note 83.

105. Corkindale, *supra* note 71.

106. Sherman, *supra* note 70.

107. *Id.*

108. *See* Safaryazdi, *supra* note 64, at 39.

109. *Id.*

110. *Id.*; Sherman, *supra* note 70.

pressure/difficulty, when summer jobs or internships are lingering in the distance, or when post-graduate life is rapidly approaching.¹¹¹ Perfectionism can have a negative effect on mental health and life style.¹¹² Further, it predisposes individuals of many traumas and consequences, including self-handicapping.¹¹³

In sum, concepts like “stereotype threat” and “lack of fit” help explain the originations and innerworkings of imposter syndrome. While distinct concepts, stereotype threat, lack of fit, and imposter syndrome all underscore the marginalization of groups and the anxiety people experience due to how they interpret and internalize the perceptions and judgments of others.¹¹⁴ These phenomena, embedded in dogmas of privilege and oppression, incite a sense of otherness and proliferate the dominate metanarrative.¹¹⁵ Some groups are hyperaware of how they are “othered” and marginalized, influencing how they navigate certain spaces—including, as Part III explores, in the work place.¹¹⁶ In those settings, women and people of color tend to not act as their true, authentic selves, but instead mask, camouflage, or alter their true selves to find acceptance from the majoritarian (white male) group.¹¹⁷ This can hinder creativity, problem solving, innovation, and progress in work places.

III. EFFECTS ON WOMEN IN MALE DOMINATED CAREERS

“So I have to admit that today, even 12 years after graduation [from Harvard], I’m still insecure about my own worthiness. I have to remind myself today, You are here for a reason. Today, I feel much like I did when I came to Harvard Yard as a freshman in 1999 . . . I felt like there had been some mistake — that I wasn’t smart enough to be in this company and that every time I opened my mouth I would have to prove I wasn’t just a dumb actress. . . . Sometimes your insecurities and your inexperience may lead you to embrace other people’s expectations, standards, or values, but you can harness that inexperience to carve out your own path — one that is free of the burden of knowing how things are supposed to be, a path that is defined by its own particular set of reasons.”

—Natalie Portman¹¹⁸

Imposter syndrome affects women in male dominated careers in many

111. Sherman, *supra* note 70.

112. Safaryazdi, *supra* note 64, at 39.

113. *Id.*

114. Edwards, *supra* note 4.

115. *Id.*

116. *Id.*

117. *Id.*

118. Natalie Portman, Harvard Commencement Speech (May 27, 2015).

ways, including all of the symptoms and consequences described above. “Purl,” a Disney Pixar animated short, provides a simple, yet striking, image of what imposter syndrome looks like for women in male dominated careers.¹¹⁹ In this short, Purl, a pink ball of yarn, starts her first day at a new job in an office comprised fully of men.¹²⁰ She appears to feel like an outsider from the outset, experiencing lack of fit, stereotype threat, and imposter syndrome, and she was noticeably defeated by how her co-workers treated her and by her own self-questioning.¹²¹ In an attempt to overcome these perceived deficiencies, she knitted herself into a spitting image of the men at the office, conforming her ideas, thoughts, appearance, and attitude to attempt fitting in with her male coworkers.¹²² Purl was visibly working harder than everyone at the office, constantly trying to get people to like her and making bold moves at meetings.¹²³ Towards the end of the clip, the office had hired a yellow ball of yarn, Lacy, whom Purl initially treated as an outsider.¹²⁴ However, upon looking at an image of herself on her first day when she was still a ball of yarn, Purl quickly reached out to Lacy in attempts to bring her into the group.¹²⁵ The men in the office, although at first apprehensive, began attempting to be open to Lacy because of Purl’s attempts to normalize her.¹²⁶ Finally, the end of the clip cuts to an office that is now evenly distributed between yarn and men, and the people working there appeared noticeably happier and no longer cutting each other down but building each other up.¹²⁷ This clip makes salient the imposter syndrome women in male dominated careers often experience. Without having to explicitly state what was occurring throughout the piece, it depicts symptoms, feelings, and effects that too many women experience in the workplace from imposter syndrome, juxtaposing that experience to a gender-balanced workplace where women are not frowned on for being themselves.¹²⁸

A. Workplace Biases and Stereotypes as Instigators and Consequences of Imposter Syndrome

119. Pixar, *Purl* | *Pixar SparkShorts*, YOUTUBE (Feb. 4, 2019), <https://www.youtube.com/watch?v=B6uuIHpFkuo>.

120. *Id.*

121. *Id.*

122. *Id.*

123. *Id.*

124. *Id.*

125. Pixar, *supra* note 119.

126. *Id.*

127. *Id.*

128. *Id.*

“I think unconscious bias is one of the hardest things to get at. My favorite example is the symphony orchestra. When I was growing up, there were no women in orchestra. Auditioners thought they could tell the difference between a woman playing and a man. Some intelligent person devised a simple solution: Drop a curtain between the auditioners and the people trying out. And, lo and behold, women began to get jobs in symphony orchestras.”

—Ruth Bader Ginsburg¹²⁹

Women in male-dominated careers can experience imposter syndrome as a result of workplace biases and stereotypes that tend to run rampant in those environments. Likewise, such biases also can exacerbate the symptoms of imposter syndrome by causing women to not perform to the best of their ability, self-sabotage their own work, limit the sharing of their ideas, lose ambition, experience anxiety and depression, and develop psychosomatic symptoms.¹³⁰ Purl (in the Pixar Short) exhibits many of these effects when the gender bias she experiences intersects with her underlying imposter syndrome.¹³¹ According to hundreds of lab studies over the past forty years, ninety-six percent of women reported experiencing bias in the workplace.¹³² Researchers have come to categorize these biases into four distinct categories—“tightrope” bias, “prove-it-again” bias, “maternal wall” bias, and “tug of war” bias.¹³³ A short survey on workplace experiences and organizational climate given to people in professional careers found that experiencing these various bias categories negatively impact women’s sense of belonging and their desire to stay at the job.¹³⁴ Research done on imposter syndrome mirrors those findings, in that people experiencing imposter syndrome were more likely to change career paths.¹³⁵

A workplace survey study, *You Can’t Change What You Can’t See*, found that twenty-six percent of white women lawyers indicated that they do not receive constructive feedback, where twenty-one percent of white

129. POCKET RBG WISDOM 10-11 (Hardie Grant Books 2019) (referencing HUFFINGTON POST, Aug. 10, 2016).

130. *Infra* II.

131. Pixar, *supra* note 119.

132. WILLIAMS ET AL., *supra* note 96; Joan C. Williams et al., *You Can’t Change What You Can’t See: Interrupting Racial & Gender Bias in the Legal Profession*, American Bar Association’s Commission on Women (2018).

133. WILLIAMS ET AL., *supra* note 96.

134. *Id.*; Williams et al., *supra* note 132.

135. NOBILI & LAO, *supra* note 59.

men do not receive constructive feedback.¹³⁶ Although this experience with constructive feedback was chiefly divided by race, that itself suggests that those not in the majority at these professional careers—i.e., those who are not white men—consistently experience a lack of constructive feedback at higher rates.¹³⁷ This unequal treatment not only impacts the functioning of the workplace but can create an environment of “in group” versus “out group,” making women and minorities feel like they do not belong. This study also found a gender wage gap. The study indicated that sixty-six percent of white male lawyers believe their pay is comparable to that of their colleagues with similar qualifications and experience, whereas only forty-two percent of white women believe they have comparable pay.¹³⁸ The differing treatment and wage gap women experience are two examples of how gender biases can impact women's equality and livelihood, and also helps explain why women can begin to feel as though their accomplishments do not hold equal weight to others.

1. Tightrope Bias

“More women's representation will result in more diverse decisions that incorporate women's experiences. I don't think having women in positions of power means that the world is going to be perfect or that conflict will be eradicated. It just means that the concerns of half the population will finally be center stage.”

—Chimamanda Ngozi Adichie¹³⁹

Tightrope and prove-it-again biases are the two most common biases experienced by women with imposter syndrome. Tightrope bias, which seventy-three percent of women report experiencing in the workplace, terms the divergence of women's prescriptive stereotypes with the job at task or attempting to acquire.¹⁴⁰ The prescriptive stereotypes generally assigned to women equate “success” in a woman with an expectation that she be nice, communal, helpful, modest, interpersonally sensitive, and a good team player.¹⁴¹ Successful men, conversely, are stereotypically described as competent, agentive, direct, assertive, competitive, ambitious,

136. WILLIAMS ET AL., *supra* note 96; Williams et al., *supra* note 132. Women of color came in at a percentage of thirty five percent and forty percent for men of color.

137. WILLIAMS ET AL., *supra* note 96; Williams et al., *supra* note 132.

138. WILLIAMS ET AL., *supra* note 96; Williams et al., *supra* note 132. Women of color came in at thirty five percent and sixty-three percent for men of color.

139. *What is the most important change that needs to happen for women in the next 10 years?*, NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 108.

140. WILLIAMS ET AL., *supra* note 96; Williams et al., *supra* note 132.

141. WILLIAMS ET AL., *supra* note 96.

and leaders.¹⁴² Bette Davis, quoted in *What Works for Women at Work*, described this dichotomy by stating, “When a man gives his opinion, he’s a man. When a woman gives her opinion, she’s a bitch.”¹⁴³

Researchers explain that prescriptive gender-based stereotypes can create issues for women when there is a perceived lack of fit between a woman’s attributes and traditionally male occupations, specifically male gender-typed positions like top management and executive positions.¹⁴⁴ Despite the progressively increasing value placed on communal traits such as “strong interpersonal skills” and “ability to develop new talent” as necessary leadership and managerial characteristics, a perception that higher level jobs are inherently male has been rather resistant to change.¹⁴⁵ A recent survey asking both men and women to identify characteristics of men, women, male managers, female managers, and successful managers, men and women alike described the characteristics of a “successful manager” in a manner more closely aligned with their description of men and male managers than women or female managers.¹⁴⁶ Further research likewise has explicitly verified that a “good manager” is consistently described in masculine terms, and male qualities are thought to be a requirement for a successful executive.¹⁴⁷

Research indicates that women’s experience of tightrope bias in the workplace is pervasive: fifty-two percent of white women report that they receive pushback when they behave assertively compared to just thirty-eight percent of white men.¹⁴⁸ Hillary Clinton’s 2016 presidential campaign paints a particularly vivid example of tightrope bias: In her case, when she showed her assertive side, she was called a “nasty woman,” and each time she asserted herself, her poll numbers would drop.¹⁴⁹ The political arena is a prime example of a male dominated field, and Hillary Clinton became a victim of the public’s biases against her perceived “lack of fit” for the job.

Similarly, only 44% of women feel free to express anger at work when justified, compared to 56% for men.¹⁵⁰ Consider, for example, how Serena Williams was treated at the 2018 U.S. Open Tennis Championship when

142. WILLIAMS ET AL., *supra* note 96.

143. *Id.* at 89.

144. Heilman, *supra* note 20.

145. *Id.*

146. *Id.*

147. *Id.*

148. WILLIAMS ET AL., *supra* note 96; Williams et al., *supra* note 132. Women of color came in at fifty-four percent and forty percent for men of color.

149. Cheryl Strayed, *Someday, a ‘Nasty’ Woman Like Hillary Clinton Will Win*, TIME, 2017, <https://time.com/4959757/cheryl-strayed-nasty-women-hillary-clinton/>.

150. WILLIAMS ET AL., *supra* note 96; Williams et al., *supra* note 132. Women of color came in at 40% percent and 43% percent for men of color.

she expressed anger on the court.¹⁵¹ After Chair Umpire Carlos Ramos accused Williams of cheating and issued a code of conduct point penalty, Williams angrily complained to Ramos that she had never cheated in her life and asked for an apology.¹⁵² Instead of apologizing, Ramos issued a verbal abuse penalty on Williams, costing her a game.¹⁵³ Williams argued that there was a double standard between men and women, reminiscing over past examples of men saying a lot worse and never receiving penalties, a fellow female athlete being fined for changing her shirt during a match break when men are allowed to do this as a matter of course, and the rules being changed to not allow her to wear a compression suit she needed for health reasons and requiring her to wear a skirt.¹⁵⁴ Williams was penalized for engaging in conduct that she believed male tennis players would have gotten away with, arguably because her conduct did not “fit” the behavior expected of a woman.¹⁵⁵

Both of these examples show how lack of fit impacts women in the workplace by changing how women are expected to act and regard themselves in comparison to others as well as showing the consequences likely to result from not following society's prescriptive stereotypes or blueprints. These illustrative women being punished when they didn't comport with their expected stereotypes are indicative of the consequences imposter syndrome can have on women faced with prescriptive stereotypes they don't match.

Scholars analyzing imposter syndrome's more drastic impact on women ascertained that lack of fit from stereotyping made it more difficult for women to be hired and promoted because those making the decisions had the expectation that women would fail.¹⁵⁶ In fact, scholars found that women in male dominated careers receive negatively distorted performance

151. Liz Clarke, *In Her Anger, in Defeat, Serena Williams Starts an Overdue Conversation*, WASH. POST, 2018, https://www.washingtonpost.com/sports/tennis/in-her-anger-in-defeat-serena-williams-starts-an-overdue-conversation/2018/09/09/9d9125ea-b468-11e8-94eb-3bd52dfe917b_story.html.

152. *Id.*

153. *Id.*

154. *Id.*

155. *Id.*

156. Nathalie Przygodzki-Lionet et al., *The Effects of Facial Attractiveness, Sex, Internality of Applicants on Hiring Decisions for Managerial and Non-Managerial*, 52 *STUDIA PSYCHOLOGICA* 53 (2010), <https://search.proquest.com/docview/753819437/fulltext/3B8D02DEFCAB4F7BPQ/1?accountid=33497>; Karen Lyness et al., *When Fit is Fundamental: Performance evaluations and promotions of upper-level female and male managers*, 91 *J. OF APPLIED PSYCHOL.* 777 (2006), <https://psycnet-apa-org.uchastings.idm.oclc.org/fulltext/2006-08435-004.html>.

evaluations¹⁵⁷ and are held to a higher standard than that of men in order to get promoted.¹⁵⁸ A study that examined performance evaluations of women in the military found that women receive lower performance ratings when they worked in groups composed of less than ten percent women.¹⁵⁹ The study also found that as the proportion of women in each work group increased, women's average performance ratings also increased, suggesting that the lack of women in these roles caused supervisors to rely on male stereotypes as a lens of evaluation.¹⁶⁰ Conversely, the average performance rating for a male officer had no relation to the gender composition of his work group,¹⁶¹ an indication that in actual work situations, supervisors make differentiations between jobs and the amount of gender stereotyping.¹⁶²

Currently, women only hold 5.2% of CEO roles and women make up only 11% of top earners on the S&P 500 list.¹⁶³ Women on average earn 21% less than men, but large tech companies and banks report much higher gaps in pay.¹⁶⁴ Intel reported that women make 32.5% less than men and receive bonus pay 45.2% lower than men.¹⁶⁵ Citigroup reported their female employees make 29% less than their male employees and several banks have reported gaps of more than 50%.¹⁶⁶ Globally, there is a 32% gender gap across indices of economic opportunity, education, well-being, and empowerment, even though in OECD countries like the United States, increasingly more women than men are obtaining bachelor's degrees.¹⁶⁷ These statistics give an image of the true imbalance of gender in the workforce and how heavily the phenomena causing the imbalance can impact women's livelihoods.

Implicit biases from gender stereotyping appear to be the primary impediment to women's advancement in male-dominated workplaces.¹⁶⁸ Evidence that people who are led to believe they possess attributes similar to prototypical members of a certain occupation are more motivated to

157. Heilman, *supra* note 20.

158. Lyness, *supra* note 156.

159. Heilman, *supra* note 20.

160. *Id.*

161. *Id.*

162. Lyness, *supra* note 156.

163. Cortland et al., *supra* note 45.

164. The State of the Gender Pay Gap, <https://www.payscale.com/data/gender-pay-gap>.

165. Rebecca Greenfield, *Big U.S. Banks Resist Pressure for More Gender Pay Gap Disclosure*, BLOOMBERG, 2019, <https://www.bloomberg.com/news/articles/2019-02-13/gender-pay-gap-big-banks-tech-companies-resist-new-disclosures>.

166. Greenfield, *supra* note 165.

167. Cortland et al., *supra* note 45.

168. Heilman, *supra* note 19.

pursue that career suggests that women may believe internally that they simply do not belong in these male-dominated careers.¹⁶⁹ Effectively, the research indicates that imposter syndrome causes women to not pursue careers that have been gendered as male because of internalization of stereotypes. The Clinton and Williams examples show that women are expected to mute themselves and follow societal standards, which hinders women because they are punished for stepping out of line, and it forces them to act in ways that do not advance their careers.¹⁷⁰ That internalization of gender stereotypes, in turn, causes women to negotiate lower wages, avoid subjects like math and science, and steer clear of leadership positions and of occupations (like entrepreneurship) where women have not historically had success.¹⁷¹

Women acting in ways that do not advance their careers is underscored when women disengage in work and in themselves. This disengagement illustrates women's tendency to "self-handicap" as a consequence of the stereotype threat and imposter syndrome they experience. The risk of being judged in consideration of prescriptive stereotypes elicits a disruptive state, undercutting a woman's performance and aspirations. Imposter syndrome has been shown to manipulate women's performance in sports that are stereotyped as male or masculine.¹⁷² The more masculine people perceive a sport to be, the worse women tend to perform in the sport.¹⁷³ Additionally, women asked to take a standard intelligence test covering topics like math and language as part of a job interview, see their scores—especially their math scores—decrease when the interviewer is perceived as using sexist behavior, dominant and physically close.¹⁷⁴ The experience of stereotype threat worsens this psychological phenomenon, which impacts even seemingly objective testing.¹⁷⁵

169. Heilman, *supra* note 19; Kim Peters et al., *To Belong or Not to Belong: Evidence That Women's Occupational Disidentification is Promoted by Lack of Fit with Masculine Occupational Prototypes*, 11 J. OF PERSONNEL PSYCHOL. 148, 148–158 (2012), <https://psycnet-apa-org.uchastings.idm.oclc.org/fulltext/2012-20199-005.pdf>.

170. Heilman, *supra* note 20; Peters et al., *supra* note 169.

171. Vergauwe et al., *supra* note 101.

172. Stefano Boca et al., "You play like a Woman!" *Effects of gender stereotype threat on Women's performance in physical and sport activities: A meta-analysis*, 39 PSYCHOL. OF SPORT AND EXERCISE 95 (2018), <https://search.proquest.com/docview/2136803423?OpenUrlRefId=info:xri/sid:primo&accountid=33497>.

173. *Id.*

174. Sabine Koch, *Sexist Behavior Undermines Women's Performance in a Job Application Situation*, 70 SEX ROLES 79 (2014), https://search.proquest.com/docview/1501804230?rft_id=info%3Axri%2Fsid%3Aprimo.

175. *Id.*

Moreover, women also feel compelled to take on “office housework” tasks for the purposes of self-handicapping. Women attempting to walk the tightrope of acting in a way to get the job done while still fitting the blueprint into which society expects of them, tend to also participate in organizational citizenship behavior—or as some call it, “office housework.” Office housework is rarely highly rewarded, but every workplace needs someone to complete it.¹⁷⁶ Office housework includes cleaning up, planning parties, administrative work, scheduling conference calls, filling in on recruiting schedules, and emotional work like taking on responsibility for associates’ morale.¹⁷⁷ Women take on such administrative tasks at a rate of eighteen to twenty-seven percent higher than men.¹⁷⁸ Taking on administrative tasks is another example of how women attempt to make themselves fit the stereotypical blueprint for their gender in order to avoid negative biases.

By taking on extra duties in order to mitigate the risk of bias, women limit the amount of time and freedom needed for performing their actual career-advancing job functions.¹⁷⁹ Taking on such extra work builds in an excuse for their workplace failures or lack of progress, adding yet another layer to the cyclical nature of their imposter syndrome. Additionally, women may be taking on these office housework tasks because they are less likely to be assigned high impact tasks, or, conversely, they may be losing out on career-advancing tasks because they are busy with low credit work—in both cases possibly inhibiting their ability to receive wage increases and promotions. Whatever the precise reason, the forty-seven percent of white women who report they take on more administrative tasks than their colleagues are likely experiencing some form of imposter syndrome.¹⁸⁰ These numbers further show the pervasiveness of imposter syndrome in professional workplaces and for women within these male-dominated careers.

However, even if women overcome internalization and pursue male-typed careers, they then still face the deep-seeded sexist belief that “successful leaders” have male attributes.¹⁸¹ When they achieve success in an area deemed to be gender inappropriate, women are punished by being

176. WILLIAMS ET AL., *supra* note 96, at 59–126.

177. WILLIAMS ET AL., *supra* note 96, at 59–126.

178. *Id.*; WILLIAMS ET AL., *supra* note 132.

179. Heilman, *supra* note 20; Peters et al., *supra* note 169.

180. WILLIAMS ET AL., *supra* note 96, at 59–126; WILLIAMS ET AL., *supra* note 132. Black women came in at forty-four percent.

181. Heilman, *supra* note 19; Lyness, *supra* note 156.

disliked and repudiated by their colleagues.¹⁸² These biases are dispiriting for women's ambitions and detrimental to their advancement, causing women, society as a whole, and the organizations they work for to lose.¹⁸³ Not only are they losing the drive and potential of women, but also diversity of thought in the workplace. Furthermore, women who report that they suppress their true identity in the workplace report lower rates of satisfaction with their jobs and higher turnover intentions.¹⁸⁴ Societal sexism from lack of fit stereotyping leads to fewer women getting hired, women being given lower reviews—causing lower pay and less opportunity—and women being placed under higher scrutiny and standards in order to succeed, all of which reinforces imposter syndrome and its building blocks as the primary reason for the stratification of the work force.¹⁸⁵

2. Prove-It-Again Bias

“After all, Ginger Rogers did everything that Fred Astaire did. She just did it backward and in high heels.”

—Ann Richards¹⁸⁶

“Prove-it-again” bias describes a scenario where someone who does not, or feels like she does not, fit society's blueprint for the job she holds and must, or feels like she must, continuously reprove herself to her colleagues and superiors. Sixty-eight percent of women in professional careers report experiencing this type of bias.¹⁸⁷ Continuously reproving oneself is one of the chief consequences of imposter syndrome, stereotype threat, and lack of fit. Further, fifty-four percent of white women report pressure to prove themselves more than their colleagues while only twenty-eight percent of white men report the same.¹⁸⁸ As one woman interviewed in *What Works for Women at Work* explained, “being a minority woman

182. Heilman, *supra* note 20; Loriann Roberson and Carol T. Kulik, *Stereotype Threat at Work*, 2 ACADEMY OF MANAGEMENT PERSPECTIVES 21, 27 (2007), www.jstor.org/stable/27747371.

183. Heilman, *supra* note 20; Roberson, *supra* note 182.

184. Susan Kapitanoff et al., *Stereotype Threat, Anxiety, Instructor Gender, and Underperformance in Women*, 18 SAGE J. 213 (2017), <https://search.proquest.com/docview/1955688872?OpenUrlRefId=info:xri/sid:primo&accountid=33497>.

185. Heilman, *supra* note 19; Lyness, *supra* note 156.

186. Ann Richards, Keynote Speech at Democratic National Convention (Keynote Speech 1988).

187. WILLIAMS ET AL., *supra* note 96, at 23–58; Williams et al., *supra* note 132.

188. WILLIAMS ET AL., *supra* note 96, at 23–58; Williams et al., *supra* note 132. Women of color came in at sixty-three percent.

means your intellect is systematically discounted and Caucasian hetero men are unfailingly trusted no matter what their competency. I felt like I was constantly trying to prove myself no matter how impeccable my work product was.”¹⁸⁹ Women experiencing such prove-it-again bias then feel compelled to overwork, a tendency that also may be exacerbated by imposter syndrome (which itself causes women to feel they have to continuously work harder to overcome their imposter identities), all of which may lead to early burn out.

Fifty-one percent of white women lawyers reported that they have been mistaken for administrative staff, custodial staff, or court personnel, while only seven percent of white men have had that experience.¹⁹⁰ Moreover, around fifty percent of women report to have had their contributions attributed to someone else, or their ideas stolen, in the workplace, whereas white men report at a rate of only twenty-nine percent.¹⁹¹ A cartoon by Punch Magazine displays this concept with an image of five men and one woman at a meeting.¹⁹² The cartoon reads, “That’s an excellent suggestion, Miss Trigg. Perhaps one of the men here would like to make it,”¹⁹³ exemplifying how women’s contributions are often overlooked and not taken seriously until men suggest them. Also, the captioned image shows that the concept is so prevalent in our society that comic strips even make fun of it. Such constant expressions that women don’t “fit” into their professional workplaces not only suggest that professional women are considered outsiders in their own profession, but also that women “shouldn’t” have achieved their workplace successes in the first place, thereby igniting and exacerbating women’s own imposter syndrome.

Writer Catherine Nichols’s experience attempting to get her book published provides a stark illustration of prove-it-again bias.¹⁹⁴ Nichols explains that she sent her novel to fifty different publishers, only two of which responded by asking for a manuscript.¹⁹⁵ Then she took the same

189. WILLIAMS ET AL., *supra* note 96, at 23–58; Williams et al., *supra* note 132.

190. WILLIAMS ET AL., *supra* note 96, at 23–58; Williams et al., *supra* note 132. Professional women of color came in at fifty-eight percent.

191. WILLIAMS ET AL., *supra* note 96, at 23–58; Williams et al., *supra* note 132.

192. Punch, “*That’s an excellent suggestion, Miss Triggs. Perhaps one of the men here would like to make it.*” (a cartoon showing a sexist boardroom), CARTOONS ON SEX, SEXISM, RELATIONSHIPS AND FAMILY FROM PUNCH (1988), https://punch.photoshelter.com/image/I0000eHEXGJ_wImQ.

193. *Id.*

194. Catherine Nichols, *Homme de Plume: What I Learned Sending My Novel Out Under a Male Name*, JEZEBEL, 2015, <https://jezebel.com/homme-de-plume-what-i-learned-sending-my-novel-out-und-1720637627>

195. *Id.*

novel and sent out fifty queries with the same note attached, but this time she sent it under the name of George Leyer and with a new email address using that name.¹⁹⁶ Unlike Nichols's previous experience, "George" received *seventeen* manuscript requests.¹⁹⁷ By using a male pseudonym, Nichols's book suddenly became eight and a half times "better," piquing the interest of a third of publishing agents, compared to the one twenty-fifth success rate she experienced as a female.¹⁹⁸ In recounting this experience, Nichols concluded, "My novel wasn't the problem, it was me—Catherine."¹⁹⁹ In other words, when a woman puts forward a workplace idea or solution, it tends to be discounted, but the same idea from a man is far more likely to gain merit. Nichols's treatment also exemplifies the regularity with which women who are deemed to have a lack of fit may internalize that treatment, which can cause many of the psychological symptoms associated with imposter syndrome and hinders many women's self-esteem and drive to keep pursuing career paths.

The research on tightrope bias and prove-it-again bias suggests that Nichols's experience isn't unique: men are eleven percent more likely than women to be perceived by their peers as "leaders" or to "fit" the managerial image.²⁰⁰ Further, women are about twenty percent more likely than white men to state they are expected to be "worker bees" who work hard, avoid confrontation, and do not complain.²⁰¹ Such biases impact the human psyche, allowing the biases to take hold and affecting women's work performance and lives as a whole.

B. Mental Illness

"I am my own biggest hurdle, because no one will be a bigger critic of me than me. Whether or not you're your own worst critic, whether or not you over emphasize your confidence deficit, I do think women are much harsher on themselves and on their abilities. And I am one of them."

—Jacinda Arden²⁰²

Women in male-dominated careers also tend to suffer from mental illness at higher rates than their male counterparts. Women suffering from imposter syndrome can experience depression, neuroticism, maladaptive

196. Nichols, *supra* note 194.

197. *Id.*

198. *Id.*

199. *Id.*

200. WILLIAMS ET AL., *supra* note 96, at 23–58.

201. *Id.*

202. *What is the greatest hurdle you've overcome?*, NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 49.

personality, global negative affect, shame, insomnia, social disfunctions, and psychosomatic symptoms.²⁰³ Studies show that women experiencing imposter syndrome experience both anxiety and mind wandering, especially in academics and in the workplace.²⁰⁴ A strong body of laboratory research suggests that stress, active monitoring, and efforts to suppress intrusive stereotype-relevant thoughts can undermine academic performance.²⁰⁵ Outside of the laboratory, anxiety and self-doubt explain gender differences in real-world math and business school.²⁰⁶ Additionally, women suffering from imposter syndrome internalize their self-doubt, experience high levels of stress, sleep less, and preform less self-care.²⁰⁷

Imposter syndrome results in higher rates among women in their intentions to quit, mental exhaustion and psychological burnout (studied among women engineers who reported feeling incompetent and not being accepted by male co-workers), identity separation (studied with accounting and consulting firms), identity conflict, decreased perceived likelihood of accomplishment (researched among working women in legal and consumer goods careers), diminished well-being (researched among women in finance), and limited likelihood of recommending their career to other women looking for employment.²⁰⁸ The clip of Purl navigating her way through imposter syndrome in a male dominated workplace displayed many of these concepts, including those explained above, and the impact of imposter syndrome on women in male dominated careers.²⁰⁹

Moreover, the differential treatment women experience because of imposter syndrome in male-dominated workplaces, and the resulting effects on their mental well-being, amount to sex discrimination in the workplace. Employers should be responsible under existing gender discrimination laws for resolving such differential treatment between these sexes within the workplace. Mental illnesses resulting from imposter syndrome also should be regarded as “disabilities” that impact major life functions and women’s livelihood, thus subject to the conditions and protections imposed by disability discrimination laws. Part IV explores the role those legal protections should play in helping women overcome the effects of imposter syndrome on their work lives.

203. Safaryazdi, *supra* note 64.

204. Lu et al., *supra* note 35.

205. Kapitanoff et al., *supra* note 184.

206. *Id.*

207. NOBILI & LAO, *supra* note 59.

208. *Id.*

209. Pixar, *supra* note 119.

IV. EXISTING LEGAL REMEDIES THAT CAN ADDRESS THESE EFFECTS: TITLE VII AND THE AMERICANS WITH DISABILITIES ACT (ADA)

“Men and women are persons of equal dignity and they should count equally before the law.”

—Ruth Bader Ginsberg²¹⁰

The purpose behind both Title VII of the Civil Rights Act of 1964 (“Title VII”) and the Americans with Disabilities Act (“ADA”) is to achieve a more equal society and workplace.²¹¹ Women suffering the workplace effects of imposter syndrome should be able to turn to these laws in order to find refuge. Although it might be proper to argue that Title VII should provide a remedy though the stereotyping evidence that *Price Waterhouse v. Hopkins* lays out, according to the jurisprudence Title VII does not allow for proper remedy as discussed below. Title VII may be lacking in its ability to effectively remedy modern forms of discrimination like those described in this paper, but the ADA—because it affirmatively permits differential treatment by way of the obligation to accommodate disabilities in order to create an equal playing field and its jurisprudence is shifting to allow for mental and emotional disabilities—may be the legal approach most poised to remedy and prevent the hindering effects of imposter syndrome.

A. Title VII

“The single most important change is getting more women in senior roles and putting women in positions of power, where they can implement policies that lead to long-lasting change. That means a woman being paid a dollar to every dollar that a man makes. And that means having fair maternity and paternity benefits for people who want to have families. That’s a necessity.”

—Alex Morgan²¹²

Title VII of the 1964 Civil Rights Act forbids employers from firing, failing to hire, failing to promote, or in any way discriminating against an employee with respect to her “compensation, terms, conditions, or privileges of employment” because of the employee’s race, color, sex,

210. POCKET RBG WISDOM 14 (Hardie Grant Books 2019) (referencing VOGUE, May 4, 2018).

211. 42 U.S.C. §§12101(b).

212. *What is the most important change that needs to happen for women in the next 10 years?*, NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 109.

national origin, religion, or pregnancy.²¹³ Title VII theoretically stands for an absolute prohibition on sex discrimination in employment, subject to only one extremely narrow exception not applicable in the context of the biases and effects of imposter syndrome.²¹⁴ Short of this narrow exception, Title VII requires employers treat all sexes equally.²¹⁵ But Title VII may lack the ability to remedy the sort of discrimination described in this paper because it requires a showing of the employer's *intent* to discriminate. However, depending on how one might interpret the circumstances surrounding imposter syndrome in some cases, Title VII may provide a retroactive remedy in limited cases.

1. Individual Disparate Treatment

A person can prove sex discrimination under Title VII in three ways: individual disparate treatment, systemic disparate treatment, or disparate impact. In an individual disparate treatment case, the employee can establish a *prima facie* case of sex discrimination by offering evidence that (1) she is a member of a protected class (e.g., her gender); (2) she suffered an adverse employment action (e.g., she was fired, demoted, lost a tangible job benefit, not hired, constructively discharged, or told no position was available); (3) she was qualified for the job in question or performing satisfactorily in the job at the time of the adverse action; and (4) the adverse employment action occurred under circumstances giving rise to an inference of discrimination (e.g., similarly situated employees outside the protected class were either treated more favorably or not subjected to the same or similar adverse treatment, someone outside the protected class was selected, or the position for which employee applied remained open).²¹⁶

The employer can rebut that *prima facie* case by offering a legitimate, non-discriminatory reason for the adverse action, e.g., poor performance or misconduct, the plaintiff was not qualified for the position in question, layoffs were necessary for the business's survival, etc., and this typically is an easy burden for an employer to satisfy.²¹⁷ However, the employee may counter the employer's proffered explanation(s) by showing that those explanations are pretextual— that is, by offering evidence indicating that the

213. 42 U.S.C. §§12101(b).

214. 42 U.S.C § 2000. This exception is known as a Bona Fide Occupational Qualification (BFOQ). BFOQ allows sex discrimination when “necessary for the purpose of authenticity or genuineness,” i.e. refusing to allow women to be men’s room attendants. *Gilbert v. General Electric Co.*, 519 F.2d 661 (4th Cir. 1975), rev’d on other grounds, 429 U.S. 125 (1976).

215. 42 U.S.C § 2000(e)(2).

216. *Id.*

217. *Id.*

employer's true motive for taking the adverse action was discrimination.²¹⁸ Pretext is typically difficult for an employee to prove under Title VII.

The employee can meet her burden to prove pretext directly (e.g., sexist comments by the employer) or indirectly (e.g., statistics or different treatment of other similarly situated people).²¹⁹ For example, employers or coworkers may occasionally engage in rude or unfair behavior that can sting an employee personally and damage their performance, but such conduct alone is normally too subtle to rise to the level of proving discrimination under Title VII.²²⁰ This type of behavior, however, can help show atmospheric evidence of discriminatory animus.²²¹ Alternatively, "rude, overbearing, obnoxious, loud, vulgar, and generally unpleasant" behavior aimed at particular employees or groups of employees may be grounds for a Title VII discrimination claim, even if the conduct or comments do not overtly pertain to protected characteristics like race or gender.²²²

If a woman in these masculine heavy occupations attempted to bring an individual disparate treatment case against her employer for the effects of imposter syndrome, she would likely struggle to establish a prima facie case. Typically, an "adverse employment action" requires evidence that the plaintiff was not hired or promoted, fired, written up, or given a poor performance evaluation. Courts have routinely held that rude and unfair behavior merely affecting one's performance is not enough to establish a discriminatory act and something more is needed to rise to the level of a discriminatory adverse employment action. However, courts are split on whether monetary loss is required to establish an adverse employment action, and the effects of imposter syndrome often cause a ripple effect impacting women monetarily—and thus it may be possible in certain imposter syndrome scenarios to convince a fact-finder that there has been conduct amounting to an adverse employment action. Due to the ample evidence that women with imposter syndrome are subjected to larger biases and stereotyping, women may have enough to pull from to establish that

218. 42 U.S.C. § 2000.

219. *Id.*

220. *See Burlington N. & Santa Fe Ry. Co. v. White*, 126 S. Ct. 2405, 2415 (2006) (holding that rude, obnoxious, or petty behavior alone is not unlawful).

221. *See Demoret v. Zegarelli*, 451 F.3d 140 (2d Cir. 2006) (holding that a supervisor's overbearing approach with and criticism of a female subordinate, to which her male peers were not subjected, was evidence of gender discrimination).

222. *EEOC v. NEA*, 422 F.3d 840, 844-45 (9th Cir. 2005) (holding that shouting, foul language, invasions of personal space, and threatening gestures aimed at women employees was not, on its face, sex- or gender-related, but was nonetheless executed "because of sex" and could therefore support a claim of hostile work environment under Title VII).

they are promoted and hired less often, given lower performance evaluations, not given credit for their ideas, and passed over for equal work opportunities. This evidence would allow women with imposter syndrome to potentially make a case for this element, depending on the court's interpretation of the facts.

A plaintiff also must prove that the adverse employment action occurred under circumstances giving rise to an inference of discrimination—i.e., that the employer took the adverse action *because of sex*. This intent requirement of an individual disparate treatment case is likely to give rise to significant proof problems for women attempting to remedy the stereotyped discrimination they have experienced, because employers often will successfully argue that the symptoms and causes of imposter syndrome result from *unintentional* factors such as unconscious bias and society's external molding of people's blueprints, expectations, and stereotypes. In other words, an employer may be able to defeat the intent element by offering evidence that no decision-maker intentionally and affirmatively decided that women do not fit the required molds, and that the particular plaintiff in question was adversely affected by an accurate performance review or objective testing standard.

However, the U.S. Supreme Court has held that Title VII does protect against sex stereotyping. *Price Waterhouse v. Hopkins* tackled questions of gender non-conformity and is exemplary of the right combination needed to obtain relief for the effects of imposter syndrome.²²³ The plaintiff in *Price Waterhouse* was a woman who, despite measurable success at her job and in line for promotion, was denied that promotion because she was deemed too “aggressive” by her male peers—i.e., she did not fit her gendered stereotype.²²⁴ The Court made it clear that “[i]n the specific context of sex stereotyping, an employer who acts on the basis of a belief that a woman cannot be aggressive, or that she must not be, has acted on the basis of gender.”²²⁵ Evidence of stereotyping and bias infiltrating Ms. Hopkins's performance evaluations and reviews was deemed sufficient to satisfy her prima facie case, triggering the employer's burden to prove by a preponderance of the evidence that it would have made the same decision even if it had not taken the plaintiff's gender into account.

Women suffering the effects of imposter syndrome may attempt to point to similar evidence of gender stereotyping as the root of their underlying claims. However, most are unlikely to have the kind of blatant

223. *Price Waterhouse v. Hopkins*, 490 U.S. 228, 272 (1989).

224. *Id.*

225. *Id.* at 250.

sexist remarks peppered throughout Ms. Hopkins's evaluations²²⁶ to support an inference of intentional discrimination based on sex stereotyping. Moreover, a case like *Price Waterhouse* likely would not protect women from incidences of self-handicapping, burnout, or mental illness, and the employer may still come out ahead.²²⁷

Likewise, an employer may rebut imposter syndrome cases by bringing forth a legitimate, nondiscriminatory reason for their action—a low standard that could be reached by showing anything from the woman not being qualified to the employer having an individual animus against that specific person. All the employer must show is that they would have reached the same result had the consideration of the employee's gender not been taken into account. Such a low threshold puts significant pressure on the plaintiff to have access to specific, direct evidence of intent to discriminate, which is unlikely to be accessible in imposter syndrome cases.

Even if she somehow overcomes these hurdles, a plaintiff seeking to recover for the effects of imposter syndrome then must prove that the employer's proffered explanation is a pretext for discrimination. This can be accomplished via comparator evidence, use of experts, testimony by others who have experienced similar treatment, and further development of their prima facies case. However, imposter syndrome manifests in many different ways, making comparators and similarly situated individuals few and far between. Although experts and statistics showing the trend of biases and stereotypes may help, they are unlikely to show the direct connection to the plaintiff required to prove pretext. Additionally, twenty-first century discrimination claims usually lack direct evidence of gender animus. Modern discrimination works implicitly and behind the scenes to force women into boxes and maintain the status quo with regards to the gender hierarchy. The indirect evidence likely to be available to connect those outcomes to intentional gender animus typically will be insufficient to

226. *Price Waterhouse v. Hopkins*, 490 U.S. at 235 (“One partner described her as ‘macho’ (Defendant’s Exh. 30); another suggested that she ‘overcompensated for being a woman’ (Defendant’s Exh. 31); a third advised her to take ‘a course at charm school’ (Defendant’s Exh. 27). Several partners criticized her use of profanity; in response, one partner suggested that those partners objected to her swearing only ‘because it’s a lady using foul language.’ Tr. 321. Another supporter explained that Hopkins ‘ha[d] matured from a tough-talking somewhat masculine hard-nosed mgr to an authoritative, formidable, but much more appealing lady ptr candidate.’ Defendant’s Exh. 27. But it was the man who, as Judge Gesell found, bore responsibility for explaining to Hopkins the reasons for the Policy Board’s decision to place her candidacy on hold who delivered the *coup de grace*: in order to improve her chances for partnership, Thomas Beyer advised, Hopkins should ‘walk more femininely, talk more femininely, dress more femininely, wear make-up, have her hair styled, and wear jewelry.’”).

227. *Id.* at 250.

establish pretext, making that proof framework in a modern discrimination case nearly impossible and virtually obsolete.

2. Systemic Disparate Treatment

Alternatively, women suffering the effects of imposter syndrome may attempt a systemic disparate treatment case. A systemic disparate treatment case under Title VII describes an employer who discriminates against a worker and tends to discriminate in the same way against many people belonging to the same protected class, e.g., women as a class. This kind of case can arise from a facially discriminatory policy that clearly discriminates against one group, or from evidence of “pattern and practice” discrimination, e.g. when the employer has an unstated discriminatory policy that surfaces in a pattern or procedure within the company.²²⁸ Like with the dearth of direct evidence available to support modern-day individual disparate treatment cases, few employers still maintain facially discriminatory policies because of modern society frowning upon them. However, less explicit forms of pattern and practice discrimination continue.

Proving pattern and practice discrimination typically depends on statistical evidence showing that the employer’s decision-making process is pervaded by intentional discrimination against a protected Title VII group.²²⁹ Employees use statistics to show the difference between the workplace’s composition and the makeup of the qualified relevant labor market.²³⁰ Employees typically will supplement such statistical evidence with testimony of other employees, decision-maker statements, highly subjective decision-making practices, specific exclusionary practices, and any history of discriminatory charges filed against the employer.²³¹ The employer must then come forward with a legitimate non-discriminatory reason for the statistical disparity between the gender composition of its workplace and the available labor force, which the employee may then counter—much like in the individual disparate treatment framework—with a showing of pretext.²³²

Because the effects of imposter syndrome are so pervasive, one may at first blush conclude that a systemic disparate treatment case might be possible. Women could use many of the statistics described in this piece as well as statistics directly related to their own workplace to show how men are promoted more often, paid at higher rates, given more positive

228. 42 U.S.C § 2000(e)(2).

229. *Id.*

230. *Id.*

231. *Id.*

232. *Id.*

performance evaluations, and given further opportunity in comparison to women. The larger the discrepancy, the stronger their case may become due to the theory of probabilities—i.e., the greater the disparities between the company's gender composition and the surrounding area's makeup, the more readily the factfinder can infer an improper motive. Therefore, the use of these statistics, backed by stories of women also experiencing imposter syndrome and these similar effects in each individual's workplace, could create a strong enough picture to make a *prima facie* case of systemic disparate treatment discrimination.

However, much like in the individual disparate treatment setting, women suffering the effects of imposter syndrome will likely struggle to fully establish the *because of* requirement of intent. The employer would still only need to meet the low bar of offering a nondiscriminatory reason for the gender discrepancy, and the women would further have to rebut this nondiscriminatory reason with proof of pretext. For example, the employer may argue the differences between the composition of the employer's labor force and the composition of the qualified relevant labor market is due to women not applying for or wanting the positions, or voluntarily leaving those positions at higher rates than men do for societal reasons beyond the employer's control. Women would then need to respond with evidence of women applying for the positions, being told there were not vacancies when in reality there were, being told that they needed certain qualities or experience that the employer did not in actuality require for the position, or being discouraged from applying for promotion opportunities.

Supreme Court decisions interpreting systemic disparate treatment doctrine emphasize how difficult it is for plaintiffs to succeed in these cases once at the pretext stage. In *Personnel Administrator v. Feeney*, the Court held that to prove systemic disparate treatment discrimination, the plaintiff must show that the decisionmaker selected or reaffirmed a particular course of action at least in part because of, not merely in spite of, its adverse effects upon an identifiable group.²³³ In other words, intent must be affirmatively shown, and not merely passively perceived via the *prima facie* statistical evidence. *Feeney* and its progeny made the *because of* intent requirement just as difficult to overcome as with the intent element for individual disparate treatment.²³⁴ Therefore, analysis of the final two steps mirror those of individual disparate treatment's second and third steps, suggesting that women suffering the effects of imposter syndrome will have no more success with systemic disparate treatment framework as they would be attempting to prove individual disparate treatment discrimination under

233. *Pers. Adm'r of Massachusetts v. Feeney*, 442 U.S. 256, 264 (1979).

234. *Id.*

Title VII.

3. Systemic Disparate Impact

Finally, Title VII prohibits facially neutral employment policies and practices that, regardless of intent, result in discrimination on the basis of a protected trait because of their disproportionate effect on a protected class.²³⁵ For example, an employer may be liable if it gives a written test as a requirement of employment, and repeatedly more men than women pass the test.

Employees challenging such an employment practice do not have to prove the employer intended to discriminate, but must show that the practice has a statistically significant adverse impact on a protected class.²³⁶ Typically, if the protected class can overcome a challenged employment practice at a rate of only 80% (or less) of the non-protected class, the court will consider the employment practice as having a statistically significant adverse impact.²³⁷ However, a statistical imbalance between marginalized and non-marginalized employees does not, standing alone, amount to a prima facie showing of disparate impact. Plaintiffs must isolate and point out a specific practice causing the imbalance, and if there are too many innocent causes potentially justifying the imbalance, the prima facie case will fail.

The employer also can avoid liability if it can demonstrate that the employment practice in question is sufficiently job related and required by *business necessity*, e.g., “all of our employees must have good communication skills.”²³⁸ An employer can show job relatedness by demonstrating that the discriminatory policy accurately, even if not perfectly, aligns with successful job performance. Therefore, the employer simply must show that the policy is predictive of or significantly correlated with important components of the job for which that practice is being used to evaluate. However, when deciding between candidates who meet the criterion, the employer is free to hire the applicant most likely to perform the job successfully.

A plaintiff can overcome such a showing only with evidence that an alternative practice with lesser disparate impact would also achieve the employer’s articulated necessities.²³⁹ If the employer refused to adopt an available alternative employment practice that met the employer’s legitimate needs and would have had less of a disparate impact, that would

235. 42 U.S.C § 2000(e)(2).

236. *Id.*

237. *Wards Cove Packing Co. v. Atonio*, 490 U.S. 642, 649 (1989).

238. *Id.*

239. *Id.*

amount to a violation of Title VII. In evaluating the equality and effectiveness of the alternative device, the court will factor the costs or burdens of the alternative into the calculation.

In many of the workplace settings described in this paper, it should not be difficult for women to demonstrate that imposter syndrome impacts them to a statistically significant degree. The circumstances of imposter syndrome and its effects match up nicely with the systemic disparate impact theory because the actions taken by supervisors and employers that cause these adverse effects on women may indeed be facially neutral, but they impact women in male dominated careers at much higher rates than men in those careers. For example, any seemingly objective test that is diagnostic would increase the effect of stereotype threat on women plagued by imposter syndrome, any saliency of gender would increase self-handicapping in those women, and any subjective evaluation could elicit subconscious biases that adversely affect women at a much higher rate than men.

Moreover, unlike with the disparate treatment framework, the success of a systemic disparate impact claim is not dependent upon a showing of intent to discriminate. Nevertheless, potential plaintiffs still are likely to hit a wall in getting a remedy because of the courts' consistent hostility toward disparate impact cases. Specifically, they will struggle to point to a specific policy or practice that may be causing disparate effects on women. Indeed, imposter syndrome typically results from a multiplicity of sources that are not easily teased out—yet another way in which Title VII jurisprudence may be lacking in its ability to remedy modern forms of discrimination.

Should the employee succeed in pointing to a specific employment practice causing a disparate impact on women, the employer may nonetheless evade Title VII liability if it can show that the practice is required by business necessity. For example, the employer can likely require a math test to be at a certain level in order to receive a specific promotion for an engineering position. However, math has been stereotyped as male and women have been stereotyped to not be as successful with it. As a result of the stereotypes and biases, women imposters may then perform at lower levels than their true capabilities—and thus the evidence might show both that the test has a discriminatory impact and that its use is justified by business necessity.

Women who have been disproportionately affected by an employment practice that preys on their imposter syndrome would then succeed only by providing an alternative practice with a lower disparate impact. Possible alternatives may include requiring bias interruption training before decision-makers make their decisions, requiring interviews of the candidates, and providing regular performance evaluations. Another

alternative could consist of requiring equal pay across positions for men and women. Further, employers could attempt to change the conceptualization of effective leadership and put in place a policy that makes that revised, more equitable concept of leadership the criteria for promotions and hiring. Employers could make this new conceptualization of success more salient before tests, examinations, and performance reviews by requiring it to be posted and/or stated to reviewers and reviewees prior to beginning these processes. However, it should be noted that these alternatives suggested are likely to be administratively expensive and burdensome—not the type of one-size-fits-all alternative employment practice that this line of cases typically demands.

The alternative practices described would likely improve work performance, increase equality, and lower rates of imposter syndrome for women in male dominated careers. However, these alternatives may never see the light of day in a Title VII case because courts have a distaste for systemic disparate impact cases, often dismissing them in early stages. Courts typically seek to justify these early dismissals by suggesting that statistics alone cannot amount to proof of discrimination. Perhaps that could be avoided if combined with testimony of women at the job who are also paid less, given less opportunity, and get lower performance ratings. Regardless, the difficulty of connecting this sort of anecdotal evidence to any particular employment practice combined with the pervasiveness of gender norms, which are theoretically beyond the employers' control, shows the likely inability of success for women with imposter syndrome under Title VII.

Accordingly, it may be overly optimistic to suggest that Title VII can be an effective weapon to combat the effects of imposter syndrome on women in male-dominated careers. No matter which of the three Title VII proof frameworks one might make use of, it is likely too difficult to find sufficient evidence needed for success in court.

B. Americans with Disabilities Act (ADA)

“Equal Opportunity to be judged on merit. The change is not just how women are regarded by men, but how women regard themselves.”

—Sylvia Earle²⁴⁰

The Americans with Disabilities Act (ADA) forbids employers from discriminating against a qualified employee on the basis of the employee's

240. *What is the most important change that needs to happen for women in the next 10 years?*, NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 108.

disability.²⁴¹ Unlike Title VII, the ADA does not require that people with disabilities be treated exactly the same as non-disabled individuals.²⁴² Indeed, the ADA mandates that an employer not only avoid discriminating on the basis of disability, but also imposes an *affirmative duty* on employers to provide reasonable accommodations for otherwise qualified employees who have mental and/or physical disabilities.²⁴³ Failure to provide a reasonable accommodation is a form of disability discrimination.²⁴⁴ Applying the ADA to women suffering the effects of imposter syndrome in male dominated careers has the potential to be both a retroactive and proactive solution, making it a stronger option than bringing a claim under Title VII, because the disabling effects caused by imposter syndrome may call for reasonable accommodations.

1. Disabled

A person is “disabled” for purposes of the ADA’s mandates if the individual has a physical or mental impairment that substantially limits the individual’s ability to perform a major life activity as compared to the average person, has a record of such an impairment, or is regarded as having such an impairment by establishing that she was subjected to a discriminatory action (e.g., failure to hire or termination) because of an actual or perceived physical or mental impairment.²⁴⁵ Examples of major life activities include caring for oneself, performing manual tasks, eating, standing, lifting, bending, speaking, reading, concentrating, communicating, working, seeing, hearing, sleeping, breathing, walking, thinking, learning, as well as the operation of major bodily functions.²⁴⁶

The ADA requires that definition of a disability be broadly construed in favor of protecting individuals. An impairment that substantially limits one major life activity does not need to limit another major life activity to qualify under the ADA.²⁴⁷ An impairment that is episodic or in remission

241. 42 U.S.C. §§12112(a). Specifically, the ADA states that “[n]o covered entity shall discriminate against a qualified individual on the basis of disability in regard to job application procedures, the hiring, advancement, or discharge of employees, employee compensation, job training, and other terms, conditions, and privileges of employment.” 42 U.S.C.A. § 12112 (West).

242. *Id.*

243. *Id.*

244. 42 U.S.C. §§12112(a).

245. *See* 42 U.S.C. § 12102(3)(A); *Nunies v. HIE Holdings, Inc.*, 908 F.3d 428, 434 (9th Cir. 2018) (holding that the district court erroneously required the plaintiff to prove that his employer believed that he was substantially limited in a major life activity, which was no longer the correct legal standard following the ADA’s amendment).

246. ADA Amendments Act of 2008 § 4(a)(2)(B); 42 U.S.C.A. § 12102 (West).

247. ADA Amendments Act of 2008 § 4(a)(4)(C).

is a protected disability if it would substantially limit a major life activity when active.²⁴⁸ Moreover, determining whether a disability substantially limits a major life activity is to be made without regard to mitigating measures.²⁴⁹ A mental disability may include an intellectual or cognitive disability, organic brain syndrome, emotional or mental illness, specific learning disabilities, autism spectrum disorders, schizophrenia, and chronic or episodic conditions such as clinical depression, bipolar disorder, post-traumatic stress disorder, and obsessive compulsive disorder.²⁵⁰

Imposter syndrome and its effects may be an ADA-protected “disability,” because the consequences and symptoms of this psychological phenomenon does substantially limit one or more major life activities. Women suffering from imposter syndrome can experience depression, neuroticism, maladaptive personality, global negative affect, shame, insomnia, social disfunctions, and psychosomatic symptoms.²⁵¹ Additionally, imposter syndrome can cause women to stop caring for themselves, limit their communication, impact their work performance, cause them to stop sleeping, self-handicap their thinking and learning, as well as impact the operation of major bodily functions like headaches/migraines and more psychosomatic symptoms caused by stress. Further, the ADA explicitly states that the definition and, therefore, what qualifies as a disability, should be broadly construed to incorporate a wider range of protection, which supports the conclusion that imposter syndrome should qualify as an ADA-protected disability.

2. Qualified Individual

An individual is “qualified” if she can perform, with or without reasonable accommodation, the essential functions of the job.²⁵² Factors that determine whether a job function is essential include the employer’s judgment, written job descriptions, time actually spent on a specific function, work performed by past and present incumbents, and references to the importance of the job function in prior performance reviews.²⁵³ In addition, as under Title VII, an individual must meet the employer’s standards for the job position with respect to education, job skills, experience and other merit-based criteria to be considered qualified.²⁵⁴ Those able to meet the employer’s production standard are considered

248. ADA Amendments Act of 2008 § 4(a)(4)(D).

249. ADA Amendments Act of 2008 § 4(a)(4)(E).

250. 2 CCR § 11065(d)(1).

251. Safaryazdi, *supra* note 64.

252. 42 U.S.C. § 12111(8).

253. 29 C.F.R. § 1630.2(n)(3).

254. 42 U.S.C. § 12111(8).

qualified, but those who pose a direct threat to the health and safety of others in the work place would not be so qualified.²⁵⁵ An employer need not make reasonable accommodations for an employee who does not meet qualification requirements, like licensing or educational background, because no reasonable accommodation would make the employee otherwise qualified.²⁵⁶

Although a fact-based inquiry (similar to that of determining whether the plaintiff is indeed disabled), and each woman's circumstances are different with different strengths under the law, some women in male dominated careers might be able to call on the ADA for protection and accommodations to remedy the effects they suffer from imposter syndrome. Imposter syndrome is most evident in women in high leverage (i.e., "successful") positions. The women at the focus of this piece, i.e. those working in male dominated careers, also have the support of research showing that performance ratings were more strongly connected to career consequences for females than males.²⁵⁷ The research further indicates that women typically have to work much harder to get to the same place, and that women often are better at the work they did than men in similar positions—all of which suggests they will have little trouble proving that they have the required qualifications for the job in question.²⁵⁸

3. Discrimination because of Disability

Like Title VII, the ADA prohibits both intentional and disparate impact discrimination. Under the ADA, an employer cannot limit, segregate, or classify a job applicant or employee in a way that adversely affects the opportunities or status of that person because of a disability.²⁵⁹ Additionally, employers cannot have a policy using standards, criteria, or methods of administration with an adverse effect on people with disabilities.²⁶⁰

Though the ADA's protections from discrimination and retaliation mirror that of Title VII, the ADA may provide a better likelihood of success for imposter syndrome cases because the ADA opens the door for proving intent. Once an employer is aware of a woman's imposter syndrome—or that she suffers disabling effects associated with imposter syndrome—any

255. 42 U.S.C. § 12112(b). *See also* Chevron U.S.A. Inc. v. Echazabal, 536 U.S. 73, 78 (2002) (allowing an employer to discriminate against a disabled worker when he would pose a threat "to his own health and safety as well").

256. Johnson v. Board of Trustees, 666 F.3d 561, 567 (2011).

257. Lyness, *supra* note 156.

258. *Id.*

259. 42 U.S.C. §§12101-122133.

260. *Id.*

acts to exacerbate the disability, or any adverse employment actions against the woman, could more easily be linked to the employer's intent to discriminate (and support a claim for individual disparate treatment or systemic disparate treatment) than we see in the Title VII scenario. This means that if women with imposter syndrome reported their imposturous feelings, any act making stereotypes salient, stratifying genders in the workforce, using subjective evaluations, etc. could be useful in establishing discriminatory intent.

Additionally, once informed of the disability, an employer cannot simply continue to allow the status quo to continue, whereas rude or unfair comments without this knowledge would not be probative of discriminatory intent. For example, if an employer was made aware of imposter syndrome in its work force and still used tests known to make more women likely to self-handicap, or if the employer continued to allow male employees to make stereotypical jokes, those acts can readily be linked to discriminatory intent.

4. Reasonable Accommodations

An employer has an affirmative duty to reasonably accommodate qualified employees and applicants who have a disability.²⁶¹ A reasonable accommodation is a change made to a job or how the job is performed, to enable a person with a disability the same access to employment as a non-disabled employee without eliminating any essential job functions.²⁶² Reasonable accommodations may include, but are not limited to, making existing facilities used by employees readily accessible to individuals with disabilities, job restructuring, part-time or modified work schedules, reassignment to a vacant position without the need to apply for said position, acquisition or modification of equipment/devices, appropriate alterations of examinations, unpaid medical leave, training materials or policies, the provision of qualified readers or interpreters, and other similar modifications.²⁶³

Employers must accommodate a disability which they are actively or constructively aware of, so long as the requested accommodation would not cause an undue hardship on the employer.²⁶⁴ Whether any hardship to the employer would be "undue" depends on the nature and cost of the accommodation, the impact the accommodation would place on the facility in question, the employer's overall resources, size and the number of

261. 42 U.S.C. §§12101-122133.

262. *Id.*

263. *Id.*

264. 42 U.S.C.A. § 12112(b)(5)(A).

employees, and the type of business operations being conducted.²⁶⁵ An employer also cannot deny employment to an otherwise qualified applicant because of any need to make a reasonable accommodation.²⁶⁶

Women who suffer from imposter syndrome arguably should be entitled to reasonable accommodations that may mitigate the effects of imposter syndrome. The employer's duty to reasonably accommodate would be triggered by its knowledge, constructive or otherwise, that a female employee was experiencing imposter syndrome. Accommodations pertinent to imposter syndrome may include modifying how the employee will be evaluated; altering examinations the employer uses to evaluate performance; implementing bias interrupter training, affirmative action policies, equal pay policies, and other policies designed to change the conceptualization of effective leadership to be less male dominant; granting leave to recover from symptoms; modified work schedules to allow for breaks to avoid burnout; creating pathways for reporting stereotyped or biased behavior towards women; or distribution of a new more positive and capable conceptualization of women before tests, reviews, hiring, and promotions take place.

Another possible accommodation might be a modified work schedule to allow for time for women with imposter syndrome to write on personal values. Writing on personal values has been shown in two studies to drastically reduce the gender gap in performance by reducing self-doubt and ameliorating some of the threats of imposter syndrome. Similarly, allowing employees to use company communication systems and resources to start groups, perks, programs, etc. can help women imposters create bonds and find a sense of belonging, which in turn may mitigate the symptoms of imposter syndrome and help these women return to a higher level of job performance.²⁶⁷

Providing timely and regular positive feedback to motivate, appropriately encourage, and develop self-esteem in women also could serve as an appropriate accommodation to decrease negative thoughts and reduce the onset of symptoms of imposter syndrome. Similarly, employers may wish to provide training and coping strategies for dealing with ineffective and destructive thoughts, which can improve the mental health of those suffering from imposter syndrome.²⁶⁸ These examples are just a small sampling of the possible strategies that employers could implement to accommodate women who suffer from imposter syndrome; most would

265. 42 U.S.C.A. § 12111(10)(B).

266. *Id.*

267. Nobili and Lao, *supra* note 59; *Imposter Syndrome and why you're doing fine*, *supra* note 60.

268. Safaryazdi, *supra* note 64.

be relatively simple to put in place, without imposing an undue burden on most employers.

Therefore, the ADA could be a critical tool to equalize the playing field for women in male dominated careers. It not only protects them from discrimination and harassment tied to gender-based manifestations of imposter syndrome, a retroactive remedy, but also can limit the effects of imposter syndrome because of the obligation it imposes on employers to provide reasonable accommodations, a proactive solution. Because intent to discriminate because of one's disability (using the ADA) may be easier to prove than sex discrimination under Title VII, and because the ADA affirmatively permits treating disabled employees differently to create the same opportunity to be successful in the workplace, the ADA appears to be a substantially more effective tool than Title VII to combat the debilitating effects of imposter syndrome and sex stereotyping for women in male dominated careers. But the ADA's protections of course do not stop imposter syndrome before it starts. Eliminating imposter syndrome and its effects altogether requires a shift of culture, which laws rarely succeed in forcing on society.

V. CONCLUSION

“Grit and perseverance to persist through what at times seemed like insurmountable gender discrimination, in an effort to show young women they can succeed in a male-dominated field.”

—*Kelly Martin*²⁶⁹

Women in male dominated careers are one of the marginalized groups most susceptible to imposter syndrome. The theories of lack of fit and stereotype threat help explain both how imposter syndrome can affect women and how those stereotypes and biases can lead to imposter syndrome in the first place. Understanding imposter syndrome and its underlying causes and effects can provide insight into possible solutions on how to break the cyclical nature of imposter syndrome. Beyond the altruistic reasons for wanting to see women's equality, eliminating (or at least minimizing the effects of) imposter syndrome can improve work performance, innovation, diversity of thought, and productivity. Studies show that a positive work environment increases the value of employees' work. Additionally, incorporating and improving women's involvement in the workplace helps the economy flourish. Therefore, not only is resolving imposter syndrome good for everyone's conscience; it is good for

269. *What is your greatest strength?*, NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 131.

everyone's pockets as well.

Imposter syndrome affects women in male dominated careers by allowing society to internalize biases and stereotypes, impacting women's livelihood and mental health. Workplace discrimination laws may be useful in combatting that reality. While Title VII provides only minimal retroactive remedies to compensate women who have suffered the effects of imposter syndrome, the ADA may allow for fuller coverage because of the duty it imposes on employers to provide proactive accommodations as well as retroactive remedies. However, neither of these laws stop imposter syndrome from taking root in women in male dominated careers. To eliminate imposter syndrome altogether, society needs to make large cultural shifts in how women are categorized, and employers must use the many tools at their disposal to prevent development of this phenomenon in their workplace.

A. What Can Employers do?

"A lot of tech companies in particular love to make big flashy statements at their all-hands and in their press releases about 'improving their percentages' of women to men. However, very few of them seem to realize that this is way more than a numbers game that looks good to outside media and shareholders. On one hand, you need to be able to find the talented women that meet your bar and interview them. This is a whole societal issue of encouraging girls into science and male-dominated fields from a young age. On the other hand, once these women have made their way into the organization, employers need to ensure that they are comfortable, their needs are being met, and any reports of harassment or discrimination are being handled appropriately. If there is not a welcoming environment, you will see women leaving in droves."

—Anonymous²⁷⁰

The law cannot entirely resolve imposter syndrome for women in male dominated careers, so the best thing employers can do is be proactive. The first thing employers need to do is gain an understanding of what imposter syndrome is and how it affects people in their workplace.²⁷¹ Employers can then put policies in place to support women earlier rather than later and require bias interruption training as needed.²⁷² Enacting affirmative action

270. Telephone Interview with Anonymous, Software Engineer, Major Tech Company (2020) (responding to the question "What can employers do about imposter syndrome?"). They requested to remain anonymous due to fear of backlash.

271. JUDY ROBERTSON ET AL., *Dealing with Imposter Syndrome*, in EQUALBITE: GENDER EQUALITY IN HIGHER EDUCATION 146-151 (Judy Robertson et al. eds., 2018).

272. WILLIAMS ET AL., *supra* note 96.

policies is important to resolving this issue. Additionally, employers can make sure they are putting equal expectations on men and women, and they should expect (and train) supervisors and decision-makers to do the same. Employers can ensure they pay men and women equally and strive for equal representation of all groups in their workplace, especially in higher level and management positions.

Employers also can more broadly aim to shift the culture of their workplace and change the conceptualization of what makes for effective leadership. A shift to valuing communal attributes like sharing responsibility, developing others' skills, building relationships, and reducing hierarchy, can reduce the perceived lack of fit many women experience, along with the negative performance expectations placed on them and the negative distortion of their performance evaluations. Additionally, such a shift in leadership values can diminish the use of prescriptive stereotypes and biases by tempering the perceived normative violations and resulting disapproval that occurs when women take on and succeed at these traditionally male roles.

Further, employers should attempt to create a more optimistic workplace atmosphere, including regular positive assessments of women's work. When giving criticism, supervisors should reframe these failures as opportunities and let those they are critiquing know that building confidence leads to competency, which they will have to obtain at some point in their career.²⁷³ This can alleviate some of the imposturous emotions that come with receiving stereotyped evaluations and experiencing failure.²⁷⁴ Also, a change in atmosphere should make sure to include resources for employees to reflect on personal values that will ultimately improve their performance.

Employers can also start groups, perks, and programs for employees to boost morale and help eliminate outgroup feelings. The supportive environment associated with mentoring programs and peer support groups has been shown to drastically decrease imposter symptoms and other psychological hardships experienced in the workplace by reducing "outgroup" feelings.²⁷⁵ One such program is to provide a mechanism for reporting feelings of imposter syndrome that is designed to lead to support in resolving and coping with the phenomenon. These approaches will help women in male dominated careers break the silence, separate feelings from facts, recognize the proper time and place to have these imposturous

273. Corkindale, *supra* note 71; Sherman, *supra* note 70.

274. Corkindale, *supra* note 71; Sherman, *supra* note 70.

275. Nobili and Lao, *supra* note 59; *Imposter Syndrome and Why You're Doing Fine*, *supra* note 60; Corkindale, *supra* note 71; Sherman, *supra* note 70.

feelings, accentuate the positive things, develop new and healthier responses to failure and mistakes, ask questions, visualize success, and reward themselves, which are all vital steps in resolving imposter syndrome.²⁷⁶

Although imposter syndrome stems from the stereotypes, biases, and expectations society at large (not solely employers) places on women, the more actions employers take to improve the status of female workers, especially those in male dominated careers, will result in a more equal and mentally healthy society. Employers' preventative actions, spurred by (and deterred by) legal backing from the ADA and Title VII, can dramatically improve the experiences of women in male dominated careers.

B. Closing Remarks

"There is a stubbornness about me that can never bear to be frightened at the will of others. My courage always rises at every attempt to intimidate me."

—Elizabeth Bennet²⁷⁷

Finally, for those experiencing imposter syndrome, overcoming this phenomenon is a long battle. Imposter syndrome is not something that one can overcome overnight, but rather is something 'imposters' must work on every day to change their internal beliefs and societies external pressures. As Chimamanda Ngozi Adichie has explained: "Culture does not make people. People make culture. If it is true that the full humanity of women is not our culture, then we can and must make it our culture."²⁷⁸ Although cultural shifts are not easy to accomplish, women must begin empowering themselves to reject the stereotypes associated with imposter syndrome.

Eleanor Roosevelt explained women's strength, and their ability to rise above struggles like these with her suggestion that "[a] woman is like a tea bag - you can't tell how strong she is until you put her in hot water."²⁷⁹ Michelle Obama further elaborated on this notion in a recent speech: "Women, we endure those cuts in so many ways that we don't even notice we're cut. We are living with small tiny cuts, and we are bleeding every

276. Corkindale, *supra* note 71; Sherman, *supra* note 70.

277. JANE AUSTEN, PRIDE AND PREJUDICE 156 (1813).

278. Chimamanda Ngozi Adichie, *I Decided to Call Myself a Happy Feminist*, THE GUARDIAN, 2014, <https://www.theguardian.com/books/2014/oct/17/chimamanda-ngozi-adichie-extract-we-should-all-be-feminists>.

279. Michael Weishan, "A Woman is Like a Tea Bag": Eleanor Roosevelt, and Radical Women of the 20s and 30s 3-26, THE FRANKLIN DELANO ROOSEVELT FOUNDATION (March 6, 2018), <https://fdrfoundation.org/eleanortoo-radical-women-of-the-1920s-and-1930s/>.

single day. And we're still getting up."²⁸⁰ These powerful women remind us that for the last century women have experienced setbacks like imposter syndrome, but they continue to push forward.

Women experiencing imposter syndrome should channel this strength for a better future. Influential figures have already begun spreading this message. Beyoncé has stated, "We need to reshape our own perception of how we view ourselves. We have to step up as women and take the lead."²⁸¹ Similarly, Cher has opined that "[w]omen have to harness their power—it's absolutely true. It's just learning not to take the first 'no'. And if you can't go straight ahead, you go around the corner."²⁸²

If women in male-dominated careers follow these strong women's sentiments, a ripple effect will begin. As Maya Angelou suggested, "Each time a woman stands up for herself, without knowing it possibly, without claiming it, she stands up for all women."²⁸³ Audre Lorde expressed the converse proposition: "I am not free while any woman is unfree, even when her shackles are very different from my own."²⁸⁴ Both viewpoints are important to helping spread lasting change. Serena Williams has echoed this sentiment: "Every woman's success should be an inspiration to another. We're strongest when we cheer each other on."²⁸⁵ Williams exemplified this when taking time to tell the crowd to stop booing and celebrate the woman she had just lost to in the finals of the 2018 U.S Open Championship, Naomi Osaka.²⁸⁶

Women empowering women by reaching back and lifting each other

280. Danika Worthington, *In Denver Speech, Michelle Obama Urges Women to Seize Their Power While Not Hiding Their Scars*, DENVER POST (2017), <https://www.denverpost.com/2017/07/25/michelle-obama-speech-womens-foundation-of-colorado-30th-anniversary-denver/> (quoting live interview with Michelle Obama, Former First Lady, and Lauren Y. Casteel, President and CEO, Michelle Obama's speech during a live conversation with The Women's Foundation of Colorado (President and CEO Lauren Y. Casteel at Pepsi Center on July 25, 2017)) in Denver.

281. Sophie Gallagher, *9 Inspiring Beyoncé Quotes That Made Us Proud to Be Women*, HUFFINGTON POST (2016), https://www.huffingtonpost.co.uk/entry/inspiring-beyonce-quotes_uk_57c9379ee4b085cf1ecdfafa2 (quoting Beyoncé Knowles).

282. Megan Lasher, *10 Cher Quotes That Will Make You Feel Like Anything is Possible*, TIME (2016), <https://time.com/4336945/cher-quotes-birthday/> (quoting Cher).

283. Juston Jones, *When It Comes to Politics, Friendship Has Its Limits*, N.Y. TIMES, July 23, 2007, <https://www.nytimes.com/2007/07/23/us/politics/23oprah.html>, (quoting Maya Angelo, speaking about Hillary Rodham Clinton).

284. Audre Lorde, *The Uses of Anger: Women Responding to Racism*, 9 CUNY WOMEN'S STUD. Q. 7, 10 (1981).

285. Serena Williams, *Our Story: #BeSeenBeHeard*, SERENA | STRONG SEXY SOPHISTICATED CLOTHING BY SERENA WILLIAMS (2020), <https://www.serenawilliams.com/pages/our-story>.

286. Clarke, *supra* note 151.

through the glass ceiling is the necessary first step. When asked what advice she would give young women today, Kris Tompkins, former CEO of Patagonia, said,

“So many women lack self-confidence. You have to jump 30 more hurdles than the guy next to you to get to the same place. You have to be calculating, you have to be checking all signals in the room, you have to pick your space, pick your time to say something, to be something. Imagine the inherent exhaustion in all of that! I would say that you need to go for things, trust your instincts, and remember that luck is often a product of hard work. And be outlandish; don't worry about what people are going to think about you. Don't worry about failing or succeeding, just go for things because you think they're the right thing. And don't sit back and be driven; get in the front seat, put the key in the ignition, and drive.”²⁸⁷

Megan Markle expressed her belief that women have the tools they just need support in using them: “Women don't need to find a voice, they have a voice, and they need to feel empowered to use it, and people need to be encouraged to listen.”²⁸⁸

Women with imposter syndrome need to embrace their courageous side. This by no means should be downplayed as being easy. However, as Mia Hamm suggested, “There is something worse than missing the goal, and that's not pulling the trigger.”²⁸⁹ Putting the effort in to make a change is what matters. It can come with small comments giving corrections to those going against the needed shift for equality. For example, Mia Hamm shared, “My coach said I run like a girl. And I said if he ran a little faster, he could too.”²⁹⁰ It also comes with empowering oneself and giving oneself the opportunity to pursue things not within the societal box. Dolly Parton illuminated what breaking molds looks like when disclosing, “I'm not going to *limit* myself just because people won't accept the fact that I can do something else.”²⁹¹ That sentiment may have been best expressed by Mindy

287. *What is your greatest strength?*, NATIONAL GEOGRAPHIC WOMEN: A CENTURY OF CHANGE, Nov. 2019, at 156.

288. Jamie Ducharme, *Meghan Markle: 'There Is No Better Time' for Movements Like Time's Up and #MeToo*, TIME, Feb. 28, 2018, <https://time.com/5178875/meghan-markle-times-up-me-too-royal-foundation/>. This article contains video and quotes of Meghan Markle, The Duchess of Sussex, and is used due to the Royal Foundation removing the information on the event.

289. MIA HAMM, GO FOR THE GOAL: A CHAMPION'S GUIDE TO WINNING IN SOCCER AND LIFE, (2000).

290. *Id.*

291. Dolly Parton (@DollyParton), TWITTER (Nov. 3, 2010, 7:59 AM), <https://twitter.com/DollyParton/status/29578838509>.

Kaling, who wrote, “‘Why the fuck not me?’ should be your motto.”²⁹² So let this become the new mindset of all of those suffering from imposter syndrome; let yourself be free of the constant anxiety and allow yourself to perform to your highest capabilities. “You deserve to be here. You deserve to exist. You deserve to take up space in this world of men.”²⁹³

292. Mindy Kaling (@mindykaling), TWITTER (Jun. 7, 2014, 10:52 PM), <https://twitter.com/mindykaling/status/475515607698243584>.

293. MACKENZI LEE, *THE LADY’S GUIDE TO PETTICOATS AND PIRACY* (2018).