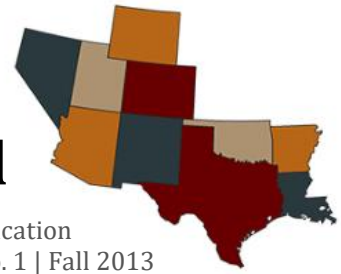


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Associate Justice Sonia Sotomayor as framed by Spanish-language and English-language news media

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Keywords: Sonia Sotomayor and confirmation, nomination, judicial, justice

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Running head: FRAMING SONIA SOTOMAYOR

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Abstract

As Latinas assume greater roles in U.S. politics and the judicial branch, are media depictions reflective of these new roles or do negative minority stereotypes persist? This study compared the frames used by The Miami Herald, an English-language newspaper and El Nuevo Herald, its Spanish-language counterpart, during Sonia Sotomayor's nomination and confirmation as the first Hispanic associate justice on the U.S. Supreme Court. The study explored whether the stronger media identification of the Spanish-language newspaper influenced the types of frames used to depict Sotomayor's rise to the high court. This investigation found that El Nuevo Herald emphasized Sotomayor as a successful woman and pioneer. The Miami Herald highlighted the ideological themes of partisan politics. As a result, the greater cultural identification with the audience may avoid manifest negative stereotypes, but may exclude this audience from political and judicial discourse.

Associate Justice Sonia Sotomayor as framed by Spanish-language and English-language
news media

The concept of “symbolic annihilation,” the media’s condemnation, trivialization, and omission of women, was popularized by Tuchman (1978). Since then, scholarship has quantified and qualified the news media’s portrayals of women (e.g., Fountaine & McGregor, 1999; Witt, Paget & Matthews, 1994). Although “symbolic annihilation” remains an important reference point, gender in the news media needs to be reconceptualized for the 21st century (Fountaine & McGregor, 2002): Women are assuming more roles of institutional power.

An assumption in gender-related media research is that increased female status is accompanied by more and better representation of women in politics and law. But there is little literature about media coverage of women in the state or federal judiciary (Everbach, 2011). Is there any evidence that as women’s political, economic, and social power increase, their media representation similarly improves? Kahn and Goldenberg (1991) found in a content analysis of U.S. Senate campaign coverage in the 1980s that news organizations report on male and female political candidates differently, concentrating more on women’s viability as candidates rather than their stance on issues. How does being an ethnic minority change in this representation?

Beale (1970) posited that ethnic women in the United States face a "double jeopardy" because their identity is partially formed by both sexual and racial stereotypes. Accordingly, a generalized image of Latinas has pervaded the mass media (Correa,

2010). Since the media are strong tools to reproduce and maintain racial and gender stereotypes (Hall, 2003), this representation has shaped the perception people may have about Latinas. And following this widespread portrayal, one may infer that Latinas are overly sensual, religious, conservative, and family oriented. However, these generalizations differ with reality. In fact, Latinas are a heterogeneous group with different levels of assimilation in the United States, and with dissimilar cultural and socio-economic backgrounds (Correa, 2010).

This investigation examined the media framing of Sonia Sotomayor, a Latina figure in the Supreme Court of the United States during her nomination and confirmation, to explore whether traditional Latina stereotypes are used in her narrative. Because it is argued that the media's tendency to stereotype minority groups is due, in part, to a weak identification with them (Correa, 2010), this study compared the frames used by an English-language online newspaper targeted to general audiences and a Spanish-language online newspaper targeted to Latinos in order to explore whether the stronger media identification with the audience affects the types of frames used to depict Sotomayor.

With the visibility of women increasing, structural, systematic gendering of women in politics (and law) takes place daily in television and radio broadcasts, and in print media. This gendering often anticipates and feeds sexist media representation of women (Fountaine & McGregor, 2002). This investigation sought to examine whether this holds true when the media's muse is an ethnic minority in a position of power.

Theoretical Framework

Framing Theory

This study focused on the frames found in English- and Spanish-language online newspapers, and the ways in which the public receive an issue. As in Correa's 2010 study on Latinas, framing--specifically taking media frames as a dependent variable--is used to explore how Latinas are present in the news media and what difference a stronger identification with the audience makes in the types of frames used to discuss Latinas and their role in society (since media frames are often most influential when they resonate or align with existing public values [Pan & Kosicki, 1993]). Furthermore, frames are rooted in culture, resting in shared symbols or shared mental associations between groups of ideas or values and ways of interpreting observations.

Dulcan (2006) posited that news frames differ across cultures as the creators of news frames make assumptions about audiences based on traditional affinities and behaviors. Culturally based news frames assign roles to individuals, groups, organizations, and institutions. Different cultures produce different frames that consolidate shared meaning (Hall, 2000). Under these frames, the same individuals, groups, organizations, and institutions may play different roles and have varying levels of responsibility for an issue or problem, depending upon which cultural group is framing the issue (Hertog & McLeod, 2001). Such a portrayal defines whole groups of people or organizations, marginalizing them and, by extension, their views (Hertog & McLeod, 2001).

Rodriguez (1996) explained that journalists working for Spanish-language news media are in-group members of the U.S. Latino population. Because journalists for Spanish-language news media are in-group members of the Latino population with strong links to their audience and sources, research would reveal strong differences between English- and Spanish-language online newspapers. Conversely, content analyses of

Univision and ABC's newscasts have found that although Univision provided more information relevant to Latinos, the style of both broadcasts was similar and they relied on the same official sources (Rodriguez, 1996). Correa (2010) argued that the assimilation of Spanish-language media practitioners in the United States might lessen their ability to frame differently from their White counterparts.

Framing Ethnicity

The study of Latinas' portrayal in the news is almost nonexistent. Most of the research has focused on the construction of the Hispanic identity in general, and scholars have found consistent patterns (Correa, 2010). First, Latino issues are poorly covered. In their analyses of TV network news, Carveth and Alverio (1997) found that only 1% of all news stories broadcast by ABC, CBS, and NBC focused on Latino current affairs.

Second, the near-invisibility of Latinos in the news not only results in poor coverage of Latino-related events, but also in the failure to include Latino voices in the few events that are covered (Vargas, 2009). Third, Latino news is often covered by non-Latino or even non-minority reporters (Carveth & Alverio, 1997). Fourth, Latinos are consistently and uniformly portrayed more negatively than other racial and ethnic groups (Navarrete & Kamasaki, 1994). Lastly, Latinos are rarely constructed as authorities. Even the coverage of Latino current affairs often fails to include Latino experts (Vargas, 2000).

The news media have been criticized for covering minorities through symbols and stereotypes, yet minorities are more diverse in their education, profession, and class status than ever before (Corney, 2006). Wilson & Gutierrez (1985) found that journalists covered minority communities only when these communities posed a threat to the majority, or were involved in a colorful cultural festival, befitting of common

stereotypes. The result was news content that reinforced rather than challenged the established norms and attitudes of American society.

Stereotypes take the blame. Local Hispanic community leaders blamed employment patterns and traditional stereotypes for an overemphasis on crime and negative news, a shortage of positive news, and less frequency and prominence given to Hispanics (Kamalipour & Carilli, 1998). Short and Magana (2002) found that readers exhibited stronger negative sentiment toward Hispanic immigrants when the immigrants were tied to news stories related to parking violations versus reports about non-immigrants with parking violations. Entman and Rojecki (2005) argued that the patterns of racial inclusion and exclusion could reinforce an image of minorities as a group whose identity, knowledge, and interests were both narrower and different from Whites. Often Spanish-language, Latino-produced media were the best source for positive portrayals of immigrants as courageous, strong, and proud of their ethnic group (Vargas & DePysler, 1998).

Paucity of Latinos in the news. "Network Brownout 2001," a study by the National Association of Hispanic Journalists, found inadequate attention paid to Latinos (Elber, 2007). The study found that 120 Latino-related stories made up less than 1% of the approximately 16,000 that aired on the major newscasts in 2002. That was a small increase over 2001. In addition, Hispanics appeared more regularly in sports news and soft news of U.S. papers, but less regularly in hard news (Greenberg & Brand, 1994).

The absence of Latinos in English-language mainstream media is an-all-too recurrent theme, and most of the Hispanic images that were previously created remain unchallenged. For instance, marketing and advertising campaigns trying to reach Latinas use stereotypical descriptions to portray Latinas, such as the engine of their family,

romantic, and conscious of their appearance (Correa, 2010). Findings from framing theory indicate that the way a given piece of information is described creates different outcomes among audiences, and that the media can successfully make various aspects of an issue more or less accessible and therefore prime which pieces of information people will use when they make decisions (McCombs & Shaw, 1972; Zaller, 1992; Baumgartner & Jones, 1995) about policies, candidates, or laws. It was also found that English-language newspapers publish few stories that have anything to do with Latino politics or issues; Latino political or legal issues are covered inconsistently as well; and only a fraction of those stories include news with Latino references in the headlines. Media researchers have indicated that the impact of minority marginality in the media only serves to further entrench the invisibility of ethnic minorities in society (Fleras, 1995). To be sure, this paucity of minorities contributes to a myth of marginalization, that racial minorities exist at the periphery of mainstream society and do not merit the attention granted to Whites (Owens, 2008).

The theoretical interest was to compare the use of frames in different publication types--English- and Spanish-language online newspapers--and to consider whether there are important differences between the two.

Research Questions

RQ1: What frames are most frequently used by the English-language online newspaper to cover Sonia Sotomayor?

RQ2: What frames are most frequently used by the Spanish-language online newspaper to cover Sonia Sotomayor?

RQ3: To what extent, if any, will English- and Spanish-language newspapers differ in relation to the media frames used in news coverage of Sonia Sotomayor?

Method

Research Design

This study employed a quantitative, comparative analysis of articles from English-language and Spanish-language daily newspapers to investigate the research questions. This investigation was restricted to newspapers that had an online presence, and newspaper websites were preferred to radio and television news websites because online newspaper sites are greater in number and geographic diversity (Carpenter, 2010). Because the intent of this study is to determine if the frames used in reporting Latinas, as in Correa's study, remain the same when the Latina is a high-powered member of the judicial branch (Sotomayor), this study employed a similar research design as Correa's (2010) study, including six frames used by Correa (2010) that were generated as part of her qualitative examination, which included interviews with two journalists that at the time of Correa's investigation worked at the *Miami Herald* and *El Nuevo Herald*. Additional frames were incorporated, using emergent coding, to reflect the current judicial and political news cycle.

Sampling Procedure

This study examines and compares the framing of Latinas by two newspapers published in Miami-Dade County, a market highly populated by Hispanics: *The Miami Herald*, a US English-language newspaper targeted to general audiences, and *El Nuevo*

Herald, its Spanish-language counterpart targeted to Hispanics (Correa, 2010). The unit of analysis for this investigation was the individual online newspaper articles covering Sonia Sotomayor's nomination through confirmation (n=62). Examining articles covering Sotomayor during her nomination through confirmation ensured a sufficient amount of coverage to analyze. Articles from *The Miami Herald* and *El Nuevo Herald* were downloaded and printed from the NewsBank database. Online newspaper articles were selected from Sotomayor's nomination through her confirmation: May 26, 2009, through August 8, 2009. All articles within this timeframe were analyzed. Forty-six articles were analyzed from *The Miami Herald* and 16 articles were analyzed from *El Nuevo Herald*. Coding included the census of all stories covering Sotomayor's nomination and confirmation. Keywords used to select articles included: Sonia Sotomayor and confirmation, nomination, judicial, justice.

Correa (2010) posited that in order to make the Spanish-and English-language news media as comparable as possible, controlling the factors that influence the media content and isolating the impact of journalists' identification with their audience, her study analyzed the general-market newspaper *The Miami Herald* and its Spanish-language companion *El Nuevo Herald*, both owned by Knight-Ridder and The McClatchy Company and published in Dade County, Florida, and which "have distinct conceptualizations of what news is to their audience" (Rodriquez, 1999). This study employed the same procedure. *El Nuevo Herald* receives 656,500 monthly unique visitors and highlights news about Latin America and Latinos, especially Cubans (Rodriquez, 1999), while *The Miami Herald* receives nearly 7 million monthly unique visitors, thus having to fulfill the interests of a wider and more complex audience (Correa, 2010). This study uses frames derived from a study conducted by Correa (2010)

in order to extend framing research to Spanish-language online newspapers and the study of Latinas in powerful societal roles.

Data Analysis

The coding instrument was based on Correa's coding scheme and contained a list of core frames and subframes. The method was to identify one major frame per story through the headline, lead, and/or consistent repetition of certain ideas in the discourse (Correa, 2010). The author and one coder judged all the articles. Ten articles were randomly selected and independently coded by each the coder and the author. Intercoder reliability was assessed with Krippendorff's Alpha and was larger than .90 for each variable. A list of the frames and subframes and a description for each were provided. Both coders were familiarized with the coding protocol, and trained using the ten sample articles from the two newspapers.

Results

Two of the research questions asked for the most frequent frames used by *El Nuevo Herald* and *The Miami Herald* to depict Sonia Sotomayor.

Table 1. Frames and subframes of news stories about Sonia Sotomayor

	<i>El Nuevo Herald</i> (% of stories)	<i>Miami Herald</i> (% of stories)	p-value* (z-test)
F Success	56.3	19.6	<.05
SF Overcoming	56.3	19.6	<.05
SF Hardworking	31.3	15.2	n.s.
SF Pioneer	50.0	13.0	<.05
SF Family sacrifice	18.8	10.9	n.s.
SF Discrimination	0	0	n.s.
SF Sensuality	6.3	2.2	n.s.
SF Community	0	0	n.s.
F Affirmative Action	6.3	2.2	n.s.
F Sensuality	6.3	4.3	n.s.
SF Family devotion	6.3	0	n.s.
SF Success	6.3	2.2	n.s.
F Family devotion	6.3	6.5	n.s.
SF Economic sacrifice	6.3	4.3	n.s.
SF Self-sacrifice	6.3	6.5	n.s.
F Oppression	6.3	8.7	n.s.
SF Political oppression	6.3	4.3	n.s.
SF Economic oppression	0	0	n.s.
SF Sexual oppression	6.3	2.2	n.s.
SF Identity	0	2.2	n.s.
F Other: Ideological	18.8	56.5	n.s.***
SF Partisan Political	12.5	39.1	n.s.***
SF Diversity	6.3	15.2	n.s.
SF Equality	6.3	0	n.s.
SF Personal	0	10.9	<.05
F Attractive	0	0	n.s.
SF Other: Women	0	0	n.s.
F: Other: Health	0	2.2	n.s.

Total percentage**	100.3%	100%	
(N)	(16)	(46)	

Notes: F = Frame; SF = Subframes; n.s. = not significant

*The comparison did not need an analysis of statistical significance because the population analyzed was a census of newspaper stories instead of a sample. However, a z-test (test of proportions) was conducted for illustrative purposes (Correa, 2010).

**The total percentage does not add to 100 because of rounding (Correa, 2010).

***Frames that almost achieved a p-value <.05.

Framing Sonia Sotomayor by *El Nuevo Herald*

The success and ideological frames were the most prominent in the Spanish-language publication.

This research incorporated previous operational definitions from Correa (2010) for framing that are considered replicable. Additional frames were incorporated, using emergent coding, to reflect the current judicial and political news cycle, including an ideological frame, with partisan politics, diversity, equality, and personal as subframes, as well as a health frame.

Success Frame

The success frame, used in 56.3 percent of the *El Nuevo Herald* news stories, was identified by using some of the following keywords and catchphrases (Correa, 2010): “achievement,” “stellar career,” “rise above odds.” For example, an article about Sotomayor reported that she was a woman who lived and achieved the unmistakable American dream: poverty and discrimination overcome with success, based on her talent and work (Milian, 2009). In using the success frame, the stories often highlighted that Sotomayor had to overcome obstacles and work hard to achieve her goals. In Correa’s study, some of the stories that used the success frame were associated with family sacrifice; this finding was only consistent when news stories included anecdotes of Sotomayor’s mother and her sacrifice to ensure Sotomayor and her brother had access to

education. A prominent subframe was Sotomayor as a pioneer, reflected in 50 percent of the *El Nuevo Herald* news stories. Several articles celebrated Sotomayor as being a Latina filling an important societal role. For example, one reporter wrote that it was a delight to see, for the first time since its establishment in 1789, a Supreme Court justice who was a woman with a Spanish surname.

Ideological Frame

The ideological frame was identified by using some of the following keywords and catchphrases: “political party,” “judicial activism,” “demagogic voices.” These phrases were only used in 18.8 percent of *El Nuevo Herald’s* news stories, though still significant. This frame was invoked mostly when a news story referenced Rush Limbaugh and Newt Gingrich as calling Sotomayor unfit for the Supreme Court not because she is a Latina or a woman, but because she is racist (Descalzi, 2009). There was a stronger identification with the ideological frame in the English-language newspaper.

Framing Sonia Sotomayor by *The Miami Herald*

The ideological, success, and oppression frames were the most prominent in *The Miami Herald’s* coverage of Sotomayor.

Ideological Frame

The ideological frame in the English-language publication, used in 56.5 percent of the news coverage versus only 18.8 percent in the Spanish-language publication, reflected the concerns of Republicans who felt that being a woman and Latina, Sotomayor would not make judicial decisions, but legislative decisions. U.S. Sen. John Cornyn, R-Texas, was noted as being the most vocal about Sotomayor. For example, his concern about “her commitment to color-blind justice” (Lightman, 2009) was reported.

Others were concerned about her 2001 comment about how a “wise Latina woman” could reach “a better conclusion than a white man.” Cornyn was also quoted as saying, “This is not about ethnicity. This is not about sex, race; it’s about the temperament of a judicial nominee.” However, it was also reported in English-language coverage that Sotomayor nearly always sided with Republican appointees in criminal cases as a one-time New York City prosecutor and trial judge (Doyle and Lightman, 2009).

Success Frame

The success frame (only in 19.6 percent of news coverage by *The Miami Herald*) reflected in the English-language publication included keywords such as “persevered,” “hard work,” and “personal challenges.” There was the general sentiment of astonishment that someone from the Bronx would attain the kind of success Sotomayor had. For example, one article reported that nobody expects you to be chosen some day for the Supreme Court when your father was a welder with a third-grade education (Lacayo, 2009).

Yet, the success frame was often accompanied by the nuance of partisan politics. Sotomayor’s story was juxtaposed to the story of Miguel Estrada, whom President Bush nominated in 2001 to serve on the U.S. Court of Appeals for the District of Columbia. For example, it was reported that Democrats in the Senate characterized Estrada’s ethnicity as politically “dangerous,” and that Estrada’s life contradicts the left’s condescending stereotypes (Franco, 2009). Republicans also used this characterization in response to Sotomayor’s nomination.

Oppression Frame

This frame, as used in Correa’s study, depicts Latinas as victims and hampered by adverse conditions. The oppression frame, used in 8.7 percent of news coverage, was

identified most when articles mentioned “identity politics.” For example, one article quipped, “The very fact that Sotomayor has to prove her impartiality to a Senate that is more than three-fourths white and male is a bit bizarre” (Goodman, 2009). Another article reported on Sotomayor’s use of Spanish while at Princeton and the errors reflected in the syntax of her papers. “That sort of mistake is common when students use different languages at home and at school. Less common was Sonia’s determination to overcome this handicap” (Winn, 2009). Another article reported that Sotomayor filed a complaint with a Washington law firm when a recruiter suggested she would not be at Yale without affirmative action (Reinhard, 2009). The sexual oppression frame was used most often in the Spanish-language online newspaper versus the use of the identity oppression frame used in the English-language online newspaper.

Frames with No Significant Difference between the Two Newspapers

Sensuality Frame

This frame was represented by 10.6 percent of news stories in both *El Nuevo Herald* and *The Miami Herald*. The sensuality frames in Correa’s study--“sensual,” “voluptuous,” “exotic,” “form-fitting clothes,” and “scantily dressed”--were not applicable to coverage of Sotomayor. Coverage represented Sotomayor as an accomplished woman with an inspiring true story. She rose to an esteemed legal career, also mentioned her work that saved baseball after the 1994 strike, for example. These accomplishments, not her looks, were deemed significant enough for the article, ‘Sonia Sotomayor, The Movie’ to question which Latina movie star would play her likeness; the usual Latina movie stars were mentioned, including Jennifer Lopez and Roselyn Sanchez (Marr, 2009).

Family Devotion Frame

This frame, used by English-and Spanish-language media in 12.8 percent of news coverage, manifests Sotomayor's mother as a pillar of strength and that family is a priority for her, using phrases such as "Sotomayor's inspired journey was built upon the strength of a mother's love in uncertain times" or "my mother has devoted her life to my brother and me." The frames show how Sotomayor's success was in part due to her mother's sacrifices.

Affirmative Action Frame

Six percent of Spanish-language news coverage and 2.2 percent of English-language news coverage included an affirmative action frame. This frame represented Latinas as part of a minority group that needs attention from NGOs and governmental agencies (Correa, 2010). In this study, the affirmative action frame manifests as a rebuttal that affirmative action is needed for a Latina to succeed. For example, an article asserted that race should not be factor of whether or not someone is successful and public opinion supports this notion: "The public opinion favors making greater efforts to improve the situation of minorities, although at the same time is opposed to giving a preferential deal [sic]" (Bata, 2009).

Conclusion

The goal of this study was to compare the framing of Sonia Sotomayor by an English-language online newspaper and Spanish-language online newspaper to explore whether stronger media identification with the audience influences the types of frames used (Correa, 2010) to depict Sotomayor. This study found that *El Nuevo Herald*, the Spanish-language online newspaper, emphasized Sotomayor's hard work to overcome odds, her pioneering spirit, and her family (mother) sacrifices to achieve her professional goals. This finding supports the idea that one key function of the ethnic media is to promote ethnic pride and community empowerment (Johnson, 2000). This study also supports Vargas and DePyssler (1998) claim that often times Spanish-language, Latino-produced media are the best source for positive portrayals of immigrants as courageous, strong, and proud of their ethnic group.

The Miami Herald, the English-language online newspaper, emphasized Sotomayor's ideological leanings and as a judicial activist. Subervi-Velez (2005) posited that Latinas as an underserved group that needs special attention is a stereotypical frame used by the news media to portray Latinas. This is consistent with this study's findings. Republican figures, namely U.S. Sen. Lindsey Graham of South Carolina, were continually reported as needing more time to make their decision on Sotomayor's nomination. For example, Graham had questions about Sotomayor's temperament, adding that he found many of her speeches over the years disturbing (Lightman and

Doyle, 2009). There were several concerns that her life experiences as a “Latina” would guide her judicial work. These concerns reflect what Subervi-Velez posited as the stereotypical framing of Latinas needing more help.

Two themes can be drawn from this study. The first is the sexist media representation. With the visibility of women increasing, structural, systematic gendering of women in politics (and law) takes place daily in television and radio broadcasts, and in print media. This gendering often anticipates and feeds sexist media representation of women (Fountaine & McGregor, 2002). This investigation confirmed that this holds true when the English-language media’s muse is an ethnic minority in a position of power. This theme was coded as the ideological frame and personal subframe as seen in 10.9 percent of *The Miami Herald’s* news stories. This generated a p-value of <.05. Thus the English-language newspaper framed Sotomayor as a temperamental judicial activist as referenced by her being a “wise Latina.” This theme was not seen in the Spanish-language newspaper.

The second is the marginalization of Latinas in mainstream news. It is important to remember that the near-invisibility of Latinos in the news not only results from poor coverage of Latino-related events, but also from the failure to include Latino voices in the few events that are covered (Vargas, 2009)--as seen in *The Miami Herald*, there was little mention of Sotomayor’s rise to the judicial branch, let alone mention of issues affecting Latinos in general. Rather, the implications of Obama’s “liberal” nomination were addressed. This theme was reflected in the ideological frame, 56.5 percent in *The Miami Herald* versus only 18.8 percent in *El Nuevo Herald*. This has implications for the general readers of *The Miami Herald* that excluded Latino issues from its news stories and the specific Spanish-language readers of *El Nuevo Herald* that excluded ideology,

including partisan politics and legislation from its news stories. If the sample size of this study had doubled, there would have been a p-value of $<.05$ to reflect this difference. Lastly, coverage of Latino current affairs often fails to include Latino experts (Vargas, 2000) as seen in *The Miami Herald*--voices that resonated loudest were those of White men.

This research adds to framing theory by demonstrating the relationship between publication type and framing (Carpenter, 2007), showing that the news media use frames for a particular audience. *El Nuevo Herald*, the Spanish-language online newspaper, framed Sotomayor in such a way as to promote a particular feature of powerful women that fits with their cultural norms, including hardworking and pioneering. *The Miami Herald*, the English-language online newspaper, framed Sotomayor in the context of partisan politics and how her life experiences would influence her judicial decisions. This study's findings are not consistent with the belief that English-language media campaigns try to reach Latinas using stereotypical descriptions to portray Latinas, such as the engine of their family, romantic, and conscious of their appearance; these stereotypes were not found.

The findings suggest that the greater cultural identification between Latinas and the Spanish-language media avoided manifest negative stereotypes. It was clear that Sotomayor was seen as a successful woman, but the overwhelming use of the ideological frame in the English-language media, virtually nonexistent in *El Nuevo Herald*, suggests that judicial or political information is unimportant to the Spanish-language audience, marginalizing them from political and judicial discourse. As seen in Correa's study, this may become harmful because it contributes to the homogenization and racialization of a group such as Latino/as.

Future Studies

While this study focuses on how news is presented and how certain issues are framed, other research has attempted to define the concept of framing by focusing on how news is comprehended (Velkenburge, Semetko, & De Vreese, 1999). Future studies should investigate the same media frames suggested in this study only as an independent variable. Since a primary limitation to the method of content analysis stems from its reliance on manifest content, which means that researchers using it cannot make claims beyond the content researched (Carpenter, 2007), future studies could demonstrate framing effects by way of a survey on the evaluations of how media frames affect a specific audience, in this case Latino/as. In addition, this research design should be applied to a different media market, i.e., New York City, where English- and Spanish-language newspapers coexist in order to determine if stronger media identification consistently influences the types of frames used to depict Latino/as.

Increasingly, media effects studies have provided evidence that stereotypes can be activated in media contexts that influence subsequent judgments (Dixon, 2006; Valentino, 1999). Much of this research suggests that schemas are difficult to remove because the frequency of activation of stereotypical constructs leads to increased accessibility and an increased likelihood of their use (Ford, 1997).

With respect to media frames as an independent variable, it should be asked: What kinds of media frames influence the audience's perceptions of certain issues (Scheufele, 1999), such as powerful Latinas? Similarly, conceptualizations of framing

developed by Pan and Kosicki (1993), Entman (1993), and Huang (1996) examined media frames as the independent variable, finding an impact on attitudes or opinions (Scheufele, 1999). Despite differences in focus, all such studies assume the same model of attitudes, in which framing changes attitudes--or assumes societal norms--by ostensibly altering the underlying considerations used in one's evaluation (Chong & Druckman, 2007). As a result of this study, it seems that Sotomayor's strong identification with Spanish-language online newspapers did challenge the evaluation or routine framing of Latinas as part of the "domestic" domain; in a framing effects study, researchers have the opportunity to assess whether this affected the Spanish-language reader's perception of Latinas in institutional roles.

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