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14. Carol J. Gill, "A Psychological View of Disability Culture," *Disability Studies Quarterly* 15.4 (1995): <http://www.independentliving.org/docs3/gill1995.html> (accessed April 13, 2012).
15. This is a trick statement in that it invites the reader to think of arguments to deny participation based on disability, thereby demonstrating the degree to which disability represents the last frontier of unquestioned human inferiority.

CHAPTER 3

HISTORICIZING DIS/ABILITY: CREATING NORMALCY, CONTAINING DIFFERENCE

David J. Connor and Beth A. Ferri

Introduction

In this chapter we trace some of the intersecting discourses of race and ability in US history and their impact upon schools. In particular, we focus upon on how the emergence of specialized forms of education served to shore up notions of competency and normalcy in times of increased diversity and social change. Through this retelling of special education history, contextualized through a much wider lens than is typically brought to bear on the subject, we highlight the broad concept of disability as an elastic, shifting classification saturated in racial, ethnic, and class divisions, influenced by powerful societal notions of what constitutes a "normal"/desirable citizen. In many ways, this version of history appears in stark contrast to traditional renderings of special education as a field that is benevolent, progressive, and undergirded by science (Dorn, Fuchs, and Fuchs). By placing the history of special education in the context of myriad social forces, we illustrate how it performed important cultural work in demarcating the line between normalcy and difference in an increasingly divided social landscape. In researching how race, ethnicity, and class influenced notions of difference, and the growth of disability categorizations from their inception to the present day, we trace the roots of current practices of special education, showing the interconnected logics for how students of color became disproportionately placed within special education classrooms. We also explore how segregated special education settings served to

contain "difference" and therefore maintain longstanding culturally established norms.

We present this history in a series of snapshots that, although appear independent or separate, are nonetheless interconnected across time and context. Each snapshot therefore engages with earlier legacies, revealing them in the form of traces of other histories of exclusion and marginalization. We settle not on one history or example for very long, but instead rely on the stacking up of these moments to illustrate the ways that the power often replicates itself, reproducing diverse forms of exclusion and marginalization that reverberate across temporal and physical contexts and cut across disability, race, and class.

Touring the Terrain of Disability and Race

People with disabilities have always existed, common to all cultures throughout time (Stiker). However, each culture's response to human difference that constitutes a disability has varied enormously and continues to do so (Linton). The institution of special education in the United States as we have come to know it, including its array of legally defined disability labels, did not arise from a within a vacuum. It materialized, rather, in response to many varied forces, all arising in relation to specific cultural and historical contexts. By contemplating these forces across time, we see how special education performed important cultural work in demarcating and emphasizing the line between normalcy and difference in a socially divided landscape.

From the outset we must consider that all developments within schooling occurred within a highly racialized society and its attendant hierarchy. People of European descent were poised at the top of the pyramid, people of African descent were placed at the bottom, and all others positioned somewhere on a continuum between them. This was seen as a natural and normal world order (Gould). For the majority of US history, notions of racial superiority and inferiority remained largely unquestioned by those who upheld and therefore benefitted from this understanding, including the government and its policies, most religions and their practices, and educational institutions and their knowledge claims.

Of interest to the histories of disability and race is the shared subjectification of people through the use of "scientific knowledge" to justify how society interprets difference (many instances will be described in this chapter). In hindsight, such instances of

subjectification can be more accurately interpreted as the use of pseudo-scientific knowledge or the misuse of legitimate scientific knowledge. Nonetheless, what these instances bring to the fore is what constitutes "difference" in terms of disability and race is invariably in relation to the established and longstanding cultural norm(s) of ablebodiedness and whiteness (Terry and Urla), both melded into the historically ideal citizen: the able-bodied white individual (usually male).¹ Conversely, the difference accorded to disabled people and black people—symbolized by the very words used (representing not able, not white)—devalued their worth, positioning them as outsiders, beyond the culturally drawn lines of what constitutes a desirable citizen.

The roots of dis/ability and racial hierarchies are manifold, tangled, and often fused, stretching over centuries with a tenacious hold, giving rise to reverberations that continue to impact contemporary society in very real ways. We believe one manifestation of such ableist and racist thinking that persists today is the overrepresentation of students of color in disability categories and placements in segregated educational settings (Losen and Orfield). Despite the progress made since the mid-1950s in terms of racial equality and civil rights, schools are still very much stratified in terms of race. As we have argued in our previous work (Ferri and Connor), this stratification has continued, due in part, to the growth of special education that created a segregated system ostensibly based on disability, but reflects the longstanding racial hierarchy of abilities. The well-intentioned focus on the "achievement gap" between white and black students serves to monitor and attempt to close these academic disparities. However, given that the disparities have always "existed," the concept of the never-quite-closed achievement gap inadvertently serves to reify such differences. Despite progress, lingering notions of white/black superiority/inferiority appear alive and well in the larger cultural psyche. Noguera points out that, "innate racial differences rooted in biology have been... the favored explanation for disparities in intellectual performance" between students of color and white students (5).

In this chapter, we guide the reader through a substantial number of historical forces that link race to general intelligence and by extension, how academic abilities are perceived and defined within schools. Our goal is to show across time and place, how pervasive these forces have been and ways in which schooling practices have been integral in shaping and reinforcing hierarchies of difference

based upon both race and disability. At the same time, we believe it is particularly important to attend to ways in which science has been evoked to legitimize claims that undergird policies. By doing so, we seek to illustrate how interpretations of science at particular junctures in history are not "objective" laws akin to those used in understanding the physical universe, but are rather culturally rooted understandings—that are not recognized as such. The events, movements, people, and phenomena in the subsequent sections have been selected because they figure in the larger tapestry of history, contributing to how certain ideas about dis/ability and race have lingered in the cultural imagination. Each contributes to the abstraction of what constitutes a desirable citizen, and the role race and disability play in that construction.

Prelude to the Twentieth Century: The 1800s

Throughout the nineteenth century, the science of phrenology held sway, asserting that a person's intelligence and personality traits could be detected from the size and shape of the skull. Polygeny, the belief that human races developed through different lineages, was propagated by in the first half of the nineteenth century by the eminent scientist Samuel George Morton who used craniometry (the measuring of skulls, including their literal capacity) to rank "races" and argue that black people were actually a separate species. Nott and Gliddon (1854) published illustrations of physical differences among species, exaggerating facial features of Africans that suggested similarities to gorillas, chimpanzees, and orangutans (see Gould, 65–7). In a country where slaves had been determined for economical and political purposes as three fifths human,² Morton's work was cited to justify the continuance of slavery. The prominent southern physician S. A. Cartwright published accounts of diseases in slaves that were both physical and mental in nature. In the *New Orleans Medical and Surgical Journal*, he elaborated upon *dysthesia* and *drapetomania*, disabling "conditions" that he personally named. Dysthesia could be detected by the following symptoms, "When driven to hard labor...he performs the task assigned to him in a head-long and careless manner, treading down with his feet or cutting with his hoe the plants he is put to cultivate—breaking the tools that he works with, and spoiling everything he touches" (Chorover in Gould, 103). Equally intriguing, drapetomania was defined as the desire of slaves to run away from their masters, seen as a form of insanity because

they could not survive without them as, "Like children, they are constrained by unalterable physiological laws, to love those in authority over them" (Gould, 103).

After 1865 in the post-slavery world of the South, black and white people continued to live separate existences, with any physical contact prohibited. Jim Crow laws ostensibly upheld the idea of "separate but equal" recognition between races, and were enacted from 1876 and 1965, mandating *de jure* racial segregation that ensured the continued social, economic, and educational disadvantaging of blacks. Throughout this almost century-long era, adherence to Jim Crow laws was reinforced through the lynching of blacks for any perceived slight against whites. By the twentieth century, public lynchings were a photographic sport, appearing on postcards (J. Allen). Undergirding these laws was a deeply rooted fear of race mingling that would lead to miscegenation, increased forms of disability, and the dilution of the population's intelligence. After a New York medical journal reported much higher rates of deafness and blindness among free blacks in the North compared to slaves in the South, Senator John C. Calhoun from South Carolina used the report to defend slavery, stating the "number of deaf and dumb, blind, idiots, and insane, of the negroes in the States that have changed the ancient relation between the races" was seven times higher than in the South (Baynton, 38).³ As Baynton notes, "The decisive argument for miscegenation being morally wrong or socially injurious was that it produced disability" (39), a claim upheld by science.

During the 1800s, instances of controlling and containing certain racial and disability groups within the population are plentiful. Fearing a slave revolt similar to Nat Turner's in 1831, the teaching of slaves to read and write was prohibited, punishable by law. After 1865, poll taxes and literacy requirements kept blacks and poor whites from voting. In the nineteenth century Native Americans continued to be dispossessed of their lands, and forcibly moved to reservations and government schools far from their homelands where language ties were severed in an attempt to colonize them (Lomawaima). The 1882 Undesirables Act gave immigration authorities permission to use exclusionary criteria to inspect and give medical tests to arriving immigrants in order to detect those "unfit" to become citizens. Those who *appeared to be* "convicts, lunatics, idiots or unable to take care of themselves were not permitted onto land" (U.S. Justia.com). Thus, individuals perceived by immigration officers as "unable to take care of themselves" were sent back to their land of origin. Baynton notes

that, "One of the fundamental imperatives in the initial formation of American immigration policy at the end of the nineteenth century was the exclusion of disabled people" (45). In sum, the concept of disability was able to be used as an exclusionary tool for various ethnicities as eugenicist ideas grew in popularity and slowly gained momentum. During the same year as the Undesirables Act (1882), another was approved—The Chinese Exclusion Act—making it the first significant law restricting immigration into the United States based solely upon race.

The Twentieth Century and Beyond

In this section, we take a journey through the twentieth century, decade by decade, illustrating the tangled discourses of race, social class, and disability, mapping a terrain that gave rise to deeply rooted ideologies about who belongs and who doesn't, who matters and who doesn't.

1900s

The 1904 World's Fair in St. Louis was an enormous event that showcased the country's economic, technical, political, and social institutions combining them into a formidable form of national prowess on the global stage. It asserted a blatant cultural alignment with "advanced" European standards, achieving this partly through its incorporation of human zoos that featured indigenous people in their natural habitat from recently "acquired" Puerto Rico, Guam, the Philippines, and other exotic locales populated by "primitives" such as Africa, South America, and the American West. In one famous instance, African Ota Benga went on to become an exhibit alongside primates at the Bronx Zoo. Interestingly, classes from schools for students with sensory impairments were also featured as live spectacle, and "like the displays of the so-called primitive races, the living displays of blind and deaf pupils were surrounded by metal bars, which kept fair-goers segregated from the students" (Trent, 13). While these "defectives" were portrayed as people with natural intelligence who could overcome sensory flaws, there was another group prominently on display, "the feeble minded," who were not framed so well. These people were the subject of Edward Ellis Allen's paper at the World's Fair, *Education of Defectives*, in which he urged for a policy of "positive social selection," urging sterilization for those persons

unable to improve. He wrote, "Accidental and sporadic deflections downward from the average would still occur; but one of the principal causes of race-deterioration would cease at the source" (Allen 827). Here, we see the continued fear of racial purity, degree of intellectual "defectiveness," and the subsequent rise in Eugenic thinking⁴ as an integral theme to the Fair. As Trent astutely notes, ability and race become interconnected in science's classification scheme:

Just as they employed educational displays and discourses to differentiate defective people, so fair officials used the same to divide so-called racial groups. And with the sanction of science, these educational classification schemes and racial divisions became ways to rationalize social control on both a national and international level (Trent 55).

The same fear of racial purity and its relation to intellectual and physical defectiveness permeated immigration policies as people flocked to the United States from all over the world. The Commissioner General of Immigration reported in 1907 that, "The exclusion from this country of the morally, mentally, and physically deficient is the principal object to be accomplished by immigration laws" (Baynton, 47), indicating a central idea of excluding disabled people. During the same year, in addition to "idiots," "imbeciles" and "feeble minded persons" became new exclusionary categories. Baynton notes that in his memoir, former mayor of New York City, Fiorello H. LaGuardia who was once an interpreter at Ellis Island, recalled that "over fifty percent of the deportations for alleged mental disease were unjustified," due to "ignorance on the part of the immigrants or the doctors and the inability of the doctors to understand the particular immigrant's norm, or standard" (46).

1910s

By the second decade of the century, the American Breeder's Association (founded in 1903) had developed a Eugenics Section under the leadership of Charles Benedict Davenport, and published influential texts such as *Heredity in Relation to Eugenics* (1911) that was cited by one third of high school textbooks between the two world wars. This book "tied fears of social chaos to the themes of race and differential immigration" (Selden, 6), targeting people of southern European origin who were "darker in pigmentation, smaller in stature, more mercurial..." (Davenport, 219).

Perhaps one of the better known psychological and eugenicist studies from this decade is Henry Goddard's *The Kallikak Family: A Study of Heredity in Feeble-Mindedness* (1912). By tracing the genealogy of a woman in his institution, and applying Mendel's Laws to human reproduction, Goddard charted a family tree split into "normal" and "feeble-minded" branches—proving with mathematical precision, the ratio of positive and negative traits. This study incited concerns about racial purity and pollution, and was used as the basis of evidence to sterilize women forcibly who were deemed "mentally retarded." The First National Conference on Race Betterment was held in 1914, the second in 1915, reflecting tensions among eugenicists such as Robert DeCourcy Ward and those seeking environmental reform such as Jacob Riis' antipoverty stance and Booker T. Washington's concern with the racial acceptance of African Americans.

In 1917, a feature film called *The Black Stork* (Wharton and Wharton) was released and it fueled the population's fears and anxieties toward disability, while portraying doctors as the moral authorities deciding who should live or die. The film "stars" the doctor from an actual case in which he convinced the parents of an infant with multiple disabilities not to intervene and save the child's life. Part of the film contains a dream sequence in which the mother sees into the future where her offspring has grown to be mentally, physically (and in true ableist style, therefore morally) deformed. Living in poverty, an army reject, a criminal, and an immoral father of numerous children with disabilities, he searches with murderous intent for the doctor who had originally saved his life, bent on revenge. Interestingly, the alternative title considered for the film was "Are You Fit to Marry?" suggesting a national state of anxiety and a disturbing form of media manipulation strong enough to induce paranoia.

The growing number of people living in poverty, particularly the immigrants in city slums, caused great consternation for eugenicists (G. Allen). It was during this period that Margaret Sanger rose to prominence as a trained nurse who advocated for the widespread use of contraception among the poor, largely on the basis of eugenic ideology. Her willingness to serve time for contravening existing laws prohibiting dissemination of such materials gained attention to her cause. Because of her committed efforts to birth control, by 1918 doctors were permitted to prescribe contraception, which was seen as a positive step in attempting to limit poor and working-class population growth.

In terms of education, at this time the federal government began to mandate compulsory schooling. Although compulsory education was established by Massachusetts in 1852, it was not until 1918 that the federal government required a compulsory education of all its citizens. Urban centers in particular struggled to accommodate first generation immigrants in large classes, most of whom were second language learners with little or no formal schooling, and who were often broadly categorized with a range of labels that were precursors to current disability labels, such as "backwards," "mentally deficient," "illiterate," "incorrigible," and "socially maladjusted" (B. Franklin).

1920s

Madison Grant's *The Passing of the Great Race* (1921) claimed Nordic superiority as the natural order of being, and proposed a national eugenics program to prevent racial erosion. An influential text between the wars, it sold over a million and a half copies, revealing how eugenic thinking continued to garner mainstream support. Grant's claims were bolstered by the ideas of biological determinism in the work of Robert Yerkes, who sought to prove the then "soft" science of psychology was actually as rigorous and indisputable as the laws of physics. During World War I, Yerkes had convinced the army that it would benefit from his coordinating testing all of its 1.75 million recruits, and from this work he developed a system of mental measurements that replicated previous racial hierarchies established by scientists. For example, average white soldiers had an average age of 13.08, Russians 11.34, Italians 11.01, Poles 10.74, and Negroes 10.41 (Yerkes in Gould, 227). These rankings had a profound effect on both immigration policies and schooling practices. We would argue that today's push for high-stakes testing and the widespread cultural assumptions about the achievement gap are legacies of this early work in mental measurement.

The eugenicist Harry Laughlin of the Pioneer Fund strategically used Yerkes' work to influence the 1924 Immigration Act, which led to severe restrictions on people seeking to immigrate to the United States from southern and eastern Europe. However, as Baynton has pointed out, disabilities has always served as the proxy for nationality in citizenship and immigration debates. In fact, these ideas were so deeply ingrained, people from all levels of US society believed that the majority of immigrants from southern and eastern Europe were feeble minded (Trent). Based on these findings, Baynton concluded

that, "The issues of ethnicity and disability were so intertwined in the immigration debate as to be inseparable" (48).

Movement *within* the country also began to reshape the demographics of America in ways that blurred the line between disability and race. The First Great Migration of African Americans spanned the years 1910 to 1940. During these years vast numbers of black Americans relocated from the rural south to the industrialized northeast and Midwest to escape racism and pursue greater job opportunities. In many respects, blacks from the south were able to fill the vacuum created by immigration restrictions on southern and eastern Europeans. Tensions rose among black migrants, recent immigrants, and the working-class Irish as they competed for both housing and jobs. As their children began filling the public schools, once again, Yerkes' work in the developing field of mental measurement exerted influence on how schools classified children and special classes became increasingly commonplace (Deschenes, Cuban, and Tyak). Biological determinism held that intelligence levels were inherited. As eugenic ideas continued to hold sway, tracking became commonplace in schools, with specialized classes for the feeble minded and for "the gifted." It is worth noting, for example, that prominent educator Leta Stetter Hollingsworth's book *Gifted Children: Their Nature and Nurture* (1926) predictably extolled the innate virtues of children from northern European stock, while dismissing their southern European counterparts.

At prestigious venues such as Philadelphia's Sesqui-Centennial Exhibition, the American Eugenics Society displayed a number of public education exhibits. One poster at the Exhibition read, "Some people are born to be a burden on the rest" (Selden, 25). Similar exhibits began to be featured at state fairs across the country. The "combined message of the traveling eugenics public education campaign was to show that race and disability were socially constructed and interconnected (Ferri and Connor, 35). Mendelian diagrams charting fit and unfit marriages, accompanied ominous warnings such as: "How long are we Americans to be so careful for the pedigree of our pigs and chickens and cattle—and then leave the ancestry of our children to chance, or to 'blind' sentiment?" (35). Competitions for Fitter Families abounded, offering eugenics medals as prizes, which were inscribed with "Yea, I Have a Goodly Heritage" (Selden, 32). All of these examples reflect a national obsession with promoting a certain type of citizen embodied in northern European stock, robust of mind-and-body.

In 1927, the superintendent of the Virginia State Colony for Epileptics and Feeble-minded filed a petition to sterilize Carrie Buck, a 17-year old who had recently been placed at his institution and daughter of a "feeble minded" mother. Understanding that Carrie was "feeble-minded" (tested at a mental age of nine) and "promiscuous,"¹⁶ a jury voted 8-1 to have her sterilized. Justice Oliver Wendell Holmes, Jr. agreed that the state's interest in maintaining a pure gene pool took precedent over individual liberties, elaborating:

It is better for all the world, if instead of waiting to execute degenerate offspring for crime, or to let them starve for their imbecility, society can prevent those who are manifestly unfit from continuing their kind. The principle that sustains compulsory vaccination is broad enough to cover cutting the Fallopian tubes... Three generations of imbeciles are enough" (*Buck v. Bell*, 274 U.S. 200).

The *Buck v. Bell* decision legitimized forced sterilization of people who were simply suspected of being disabled, impacting 65,000 individuals throughout 33 states, with some accounts citing a higher percentage of Native American and African American women (Davis) as well as among the poor.

In order to deal with school age "problem children," the Child Guidance Movement also began in the 1920s under a private foundation, the Commonwealth Fund's Program for the Prevention of Juvenile Delinquency (Horn). Child guidance clinics were established in communities, designed to treat children of "normal" intelligence who were nonetheless considered "maladjusted" due to either psychological and/or behavior problems (Richardson). Initially targeting poor and immigrant children, child guidance clinics sought to prevent juvenile delinquency and social deviance and to instill middle-class norms of behavior.

1930s

In 1932, during the Great Depression, the Third International Congress of Eugenics was held in New York. Featuring ideas championed by US scientist Harry Laughlin, the event promoted "progress" in the form of immigration restrictions, sterilization policies, eugenic-based marriage selection, and public awareness campaigns infused into school curricula. Extremely popular within the United States, many of these ideas reverberated beyond the US context. In fact, the "science" of eugenics, borrowed from the US eugenic

movement, fortified the growing extremist and nationalist movement in Germany and its "war against the weak" (Black). The rise of Nazism in Germany, which was fueled by economic depression, was further bolstered by extreme interpretations of eugenics that not only sought racial purity, but the scientific validation of a "master" race (Kuhl). In order to achieve this, subsections of the population, such as those deemed disabled, and later those from ethnic minorities (predominantly Jewish people), homosexuals, and gypsies were characterized as "lives not worth living" and were systematically exterminated (Proctor).

In the United States, African Americans continued to be devalued and denied "full" status as citizens. The infamous Tuskegee syphilis experiment, in which 399 poor African American males without health care and diagnosed with syphilis, received medical attention in exchange for their participation in a study spanning from 1932 to 1972 (Jones). Rather than treating the disease, however, researchers, wanted to observe the natural progression of the disease and deliberately withheld penicillin, which was the accepted treatment by 1947. Numerous men became disabled and died of syphilis, some infected their wives and many, in turn, gave birth to babies with congenital syphilis. The Tuskegee experiment was among several unethical studies that led to the creation of human protections in research under the Institutional Review Board. The study has remained in the collective memory of African Americans as an egregious example of abuse in the name of medicine (Washington), and has been linked to a general mistrust of African American's participation in HIV management and AIDS prevention trials (Richardson).

Informal discrimination took another turn during this time after the passage of the National Housing Act of 1934 and the practice of "redlining," namely demarcating maps to determine which neighborhoods are "safe" to invest in real estate and grant loans. This practice resulted in lack of investment in specific areas, particularly inner-city neighborhoods, many of whose buildings, including schools, slid into decay. This practice continued throughout the 1960s, when it was countered by the Fair Housing Act of 1968, which prohibited redlining based upon race and other markers of identity. In many ways, urban schools continue to be targeted by policies and reforms that have a disparate impact on under-resourced schools that continue to serve large numbers of immigrant, poor, and students of color, a disproportionate number who end up labeled as having special education needs.

Also during this time, traveling "freak shows," which had been part of American culture since the mid-1800s and often associated with carnivals and circuses, were still enjoying popularity in the waning days of vaudeville (Adams). Todd Browning's film *Freaks* (1932), told the story of a traveling show and starred actual performers with disabilities who showed off their various talents. The film exemplified a fundamental premise of the freak show, that is, to illustrate and exaggerate human difference according to "disability" in relation to "normalcy" (e.g., stature, body shape, hirsuteness, gender, and so on). Interestingly, just like the World Fairs, racial and corporeal differences were featured in freak shows, emphasizing so-called primitive "species," exaggerating physical difference, and by deliberately blurring the line between human and animal (Garland Thomson, 8). Freak shows were complicit in bolstering forms of racism, as can be seen in the racial representation of Indian, central American, eastern European, and Italian characters within the troupe in *Freaks*. Spectators left the show with their own normalcy confirmed, along with numerous stereotypes about race and disability reinforced.

By the 1930s, the fledgling child-guidance movement (first discussed in the 1920s) had become profoundly influenced by the mental-hygiene movement. Concerns continued to be raised that the majority of so-called problem children were those who were poor or who were immigrants who did not conform to middle-class expectations of normalcy and conformity. Interestingly, however, this decade also saw a shift towards these clinics becoming centers of research and treatment of middle-class children of anxious parents (Horn; Richardson).

1940s

In many ways the 1940s was marked by extreme responses to difference, taking the form of eradication and segregation. Hitler's policy of eliminating people with disabilities was known as Action T4. One of his personal physicians, Dr. Karl Brandt, led the "euthanasia" program from 1941 to 1945, in which adult mental patients from governmental and religious institutions were transferred to clinical facilities not for the purpose of treatment, but rather to be eradicated. The program, fueled by ideologies borrowed from the eugenics and racial-hygiene movements, actually began with so-called defective children and infants with disabilities, whose parents would be coerced in sending their children to centers for treatment, only to be

informed later that their child had died of some infection or illness. Because of the sheer numbers involved, individualized lethal injections gave way to gas chambers, which were designed as communal showers, a model that became the prototype for later use in concentration camps (Mitchell and Synder). It is estimated that between 200,000 and 250,000 people with physical and mental disabilities were systematically murdered under Action T4 (US Holocaust Memorial Museum).

In post-Pearl Harbor United States, racial fears materialized in the form of Internment Camps in which American citizens of Japanese ancestry were forcibly removed from their homes to live in relocation camps isolated from mainstream society. As many as 90 percent of those who were held in the camps came from those working in California's agricultural sector. White farmers, therefore, had a self-interest in the removal of Japanese Americans, a relevant reminder to interrogate who benefits from policies of exclusion and segregation in today's schools. As one farmer articulated, "It's a question of whether the white man lives on the Pacific Coast or the brown men. They came into this valley to work, and they stayed to take over" (*Korematsu v. The United States*).

Racial integration within northern industries made incremental advances in the 1930s and 40s through the growth of labor unions, guided by the interracial Congress of Industrialized Organizations (Smith). In contrast, racial segregation had remained constant in the south, but was becoming increasingly challenged by local communities of African Americans who led boycotts against segregated busses and protested against the structural arrangements that separated races. Black soldiers returned from serving in World War II had enjoyed greater status in Europe. Having proved loyalty to the United States by risking their lives, coming back home as second-class citizens made them question such inequalities. Civic and religious organizations continued to organize for civil rights. In 1948, President Harry S. Truman legislated the racial integration of the military. Schools, however, remained firmly segregated in the south—and, due to redlining in urban centers, in the north as well.

What many believe to be the start of special education occurred after World War II when a number of parent organizations advocated greater attention be paid to children with disabilities. The American Association on Mental Deficiency⁷ (now known as the American Association for Intellectual and Development Disabilities) was

formed and held its inaugural convention in 1947, helping to establish and professionalize the field of "mental retardation."

In California, the important and often under acknowledged case of *Méndez v. Westminster* (1946) called attention to racial segregation of Mexican Americans in schools, and resulted in the Andersen Bill of 1947, which repealed state school codes mandating segregation. The NAACP attorney Thurgood Marshall was coauthor of the amicus curiae brief, and Judge McCormick's decision was influenced both by legal precedent and educational research (Ruiz). This state case undoubtedly set the stage for the challenge of racial segregation in a federal court that would materialize as *Brown v. Board of Education*.

1950s

In 1954, perhaps the most important ruling in the history of US schools, *Brown v. Board of Education*, decreed that long-standing Jim Crow laws were unconstitutional and mandated the desegregation of schools and a racially integrated education system. Following this momentous decision, tactics of delays, deferments, derailments, and distractions ensued, often in a climate of bitterness and racial stereotyping (V. P. Franklin). The raw hostility toward the integration of black students in schools around the country, symbolically captured in Little Rock, Arkansas has been documented in both film and print (Jacoway and Williams). Local newspapers described black students as "slow," "retarded," "lazy," "aggressive, arrogant, and bad tempered" (Ferri and Connor), along with other general assertions of intellectual and behavioral differences. In response, the number of special education classes rose to accommodate these assumed differences and, while not then legally required, segregated classes became part of an established structure that continued to reflect the long-established racial hierarchy. Decisions about placing students in special education or remedial tracks were based on psychometric tests that were believed to be scientifically objective, although they were in fact, culturally biased toward middle-class norms (Giordano). Exploratory work at the turn of the century in Europe on measuring the *development of intelligence* (Binet and Simon) was misused almost half a century later by American Lewis Terman. Terman developed a theory of intelligence that was innate, fixed, and hereditary, which could be measured with mathematically defensible and scientific "proof" measured by the Stanford-Binet IQ test and plotted on a bell

curve. Terman's theory of intelligence as innate and heritable resonated with earlier eugenics era ideology, which remains very much in the DNA of standardized tests of ability.

In 1955, Rudolph Flesch published *Why Johnny Can't Read*, critiquing contemporary school practices. The book's title became a mantra for widespread societal concern about the American schoolchild, particularly in light of Soviet expansion into space with Sputnik. Soviet's launch of Sputnik signified that the United States had "fallen behind" in terms of scientific and technical progress. The subsequent shift in expected performance revealed a hitherto "safe" group of students who were assumed to be intellectually superior by virtue of their race and social class that were now failing academically: the struggling learners of white, middle-class Americans. These were children who did not fit in any other disability category or in the cultural imagination of the struggling or slow learner. This situation, in part, has been used to explain the "birth" of the construct of learning disabilities (LD) (Sleeter, "Why?").

Influenced by the Civil Rights Movement, parents and advocates of children with disabilities began disability specific organizations such as the Muscular Dystrophy Association and the United Cerebral Palsy Association. In turn, through advocacy and pressure, these groups continued to influence the profession of special education, developing organizations, journals, grants, and a growing field of interest in education of children with disabilities.

While disability advocacy was beginning to gain traction, national (and eugenic-based) fears of illegal immigration lowering the American gene pool resulted in *Operation Wetback*, a systematic approach of the US Immigration and Naturalization Service to remove a million illegal immigrants from the United States, focusing particularly on Mexican nationals who were living in southwestern states such as California, Arizona, and Texas. Many "Mexican-looking" people and American-born children of Mexican descent were forcibly removed and transported to Mexico (Gutierrez).

1960s

In the 1960s, disability as a field of study gained increased legitimacy. President John Kennedy stated, "Mental retardation ranks with mental health as a major social, and economic problem in the country. It strikes our most precious asset, our children" (Kennedy). Once elected, he soon established a national panel on Mental Retardation

that stimulated interest among doctors and educators. The panel called attention to society's inadequate response to people with intellectual differences, such as the common practice of lobotomy—a procedure the president's sister, Rosemary, had undergone—as well as forced institutionalization in deplorable and abusive conditions (Blatt and Kaplan). For example, at Willowbrook, an overcrowded institution for individuals with intellectual disabilities, which (ware) housed over 6,000 "patients," scientists conducted a longitudinal medical study (the study began in 1955 and continuing for 15 years), in which children identified as mentally retarded were intentionally introduced the hepatitis virus in order to monitor and document the effects of gamma globulin in fighting the disease. Like the Tuskegee syphilis experiment on African Americans before it, this study demonstrated an unconscionable and unethical disregard for basic human rights of individuals (this time people with disabilities) in medical research.

A greater awareness of cognitive diversity emerged in the 1960s around the area of learning in general. Histories of special education typically locate the concept of LD as officially coined by Samuel Kirk at a 1963 conference for parents in Chicago.⁸ Research on LD during the 1960s, indicates that the term LD was given almost exclusively to white children, most of whom were also male (Sleeter, "Why?"), despite the fact that there was no medical or biological basis for this disproportionate application of the LD label. In fact, it is widely accepted that race, class, and sex contribute to a bias whereby certain labels are disproportionately applied to certain groups, a bias that has remained constant with some labels (intellectual and emotional disabilities) and has changed over time for other labels (LD). The label of LD illustrates the *political* nature of disability. Because parental involvement was instrumental in establishing this category (Danforth), a category that was created to ensure children labeled LD would be educated separately from children in other disability-related categories, such as "socially maladjusted," "culturally deprived," "mentally retarded," and "emotionally disturbed," which were largely synonymous with race, ethnicity, and social class (Carrier). The *Journal of Learning Disabilities* began in 1968, further legitimizing the field, and separating it from notions of Mental Retardation, a field that had been professionally established with the publication of the *American Journal of Mental Retardation* in 1886.

The theme of reinforcing, dismantling, and subverting racial divisions echoed throughout the decade. The 1967 landmark case, *Loving*

v. Virginia, involved an interracial married couple who were prosecuted for miscegenation under the eugenic-based Racial Integrity Act of Virginia (1924). The unanimous decision of the Supreme Court declared Virginia's Racial Integrity Act unconstitutional, thereby also overturning *Pace v. Alabama* (1883) and ending legal restrictions on interracial marriage in the United States.

The racial integration of schools was resisted in many forms, one of them being the phenomenon of what came to be called "White flight," the movement of whites to suburbs and commuter towns in response to the increased number of people of color living in urban areas. The urban-suburban divide was reinforced through practices such as redlining, strategic highway construction, exploitative real estate practices (e.g., "blockbusting"), and exclusionary covenants that sought to retain control of demographically white communities. Segregation based upon housing and neighborhoods maintained de facto segregation in schools, and one response was the forced busing of students between school districts. Many whites eventually abandoned the public school system, placing their children in private or parochial schools (Schneider). The practice of tracking within schools continued to reflect and uphold racial inequities, evidenced early by disproportional labeling of racially and ethnically diverse students in the category of mental retardation (Dunn).

1970s

Busing black children to white schools and vice versa continued throughout the country, but under complaint from many communities. In Boston, for example, protests occurred in the form of marches and riots that resulted in physical violence and death. Resistance was evident in nonattendance of mandated schooling by whites, along with a rise of private and parochial schools (Cronin). Notably, the racial divide within Boston schools present in this era continued throughout the rest of the century. The 2000 census revealed the population in Boston was 54 percent white and 40 percent African American and Hispanic, whereas its public schools consisted of 14 percent white students and 76 percent of African American and Hispanic students (Boston Public Schools). This level of segregation has been documented in much of the United States (Orfield and Eaton), and is particularly characteristic of inner-city schools.

Discrimination in schools was not only limited to race; it also applied to ethnicity. In *Lau v. Nichols* (1974), a civil rights case was

filed on behalf of Chinese American students with limited English proficiency, who did not receive any special help in second language acquisition in schools. The Supreme Court ruled that the lack of linguistic accommodations constituted a denial of equal educational opportunity based on ethnicity, and increased the rights of linguistic minority and bilingual students. The ruling also came to impact the provision of bilingual special education services and, in some ways inadvertently muddled the professional waters about who receives what kind of instruction and who belongs in what placement for what reason: race, ethnicity, disability, or a combination? (Artiles and Ortiz).

The Civil Rights Movement began with African Americans, but it provided the momentum for other groups in society, including women, homosexuals, and people with disabilities to articulate their desire for equality. Influenced by these other movements, The Disability Rights Movement called attention to discrimination based on disability, focusing on issues of accessibility in terms of transportation, housing, public spaces, and cultural practices such as education, employment, and leisure. In sum, people with disabilities wanted to have greater access in order to participate in all aspects of society (Fleischer and Zames). During this decade, major legislation was passed supporting people with disabilities. In 1973, the US Rehabilitation Act prohibited discrimination based on disability in Federal-supported agencies, in programs that received financial assistance, and in employment practices of Federal contractors. Section 504 acknowledged the civil rights of people with disabilities in education, employment, and in other contexts, allowing for "reasonable accommodations." It also gave individuals with disabilities the right to sue if they sought publicly to fight discrimination.

Parents of minority children were instrumental in bringing to bear landmark cases that profoundly impacted special education practices in general, and sometimes ironically in relation to overrepresentation. For example, black parents brought the case of *PARC v. Pennsylvania* (1971) in which the state was required to provide an education to children identified as mentally retarded. Likewise, plaintiffs in the landmark decision of *Mills v. Board of Education of the District of Columbia*, (1972), which declared that all children with disabilities must be given a free public education thereby emphasizing needs over fiscal considerations, were also black.

In another example, *Diana v. State Board of Education* (1970) Spanish-speaking children had been labeled mentally retarded

based upon IQ tests administered in English. Another was *Larry P. v. Wilson Riles* (began 1971 and ended 1982), whose outcome acknowledged the discriminatory practice of disproportionate labeling of African American children as EMR (educable mentally retarded) and placing them in segregated programs. Subsequently, the use of IQ tests was banned in relation to identifying children in this category. As MacMillan, Hendrick, and Watkins noted, "many of the points made by plaintiffs in these cases were ultimately incorporated into Public Law 94-142... in the form of provisions ensuring due process, parental involvement, nondiscriminatory assessment, and placement into the least restrictive environment" (MacMillan, Hendrick, and Watkins 426). Of course, it can be argued that such gains can also be perceived as losses, in terms of how an apartheid system of education soon developed between disabled and nondisabled children, segregating ostensibly on the basis of disability, to obscure race and ethnicity.

In 1975, PL 94-142 known as The Education for All Handicapped Children Act was passed by Congress, requiring all public schools in receipt of federal funding to provide equal access to all children with disabilities. In brief, the law guaranteed the following: a free and appropriate public education; an education in the least restrictive environment; an individualized education program; procedural due process; nondiscriminatory assessment; and parental participation. Responding to these provisions, public schools opened their doors to children with an enormous range of cognitive, behavioral, physical, and sensory disabilities. This, in turn, gave rise to the professionalization of special education as school administrators, psychologists, educational evaluators, counselors, social workers, therapists, paraprofessionals, and school aides were employed in response to provisions guaranteed by law.

1980s

The publication in 1983 of *A Nation at Risk: The Imperative for Educational Reform* in a report of President Reagan's National Commission of Excellence in Education, caused widespread concern about the quality of our nation's schools. The opening pages lamented the rising tide of mediocrity in public education that threatened the nation's future and documented the poor academic performance of American high-school graduates in comparison to those in other "developed" countries. The report triggered a renewed emphasis

on standards and promoted the implementation of specific content requirements, greater use of technology, increased classroom time, and the importance of teacher competence and competitive salaries. The commission also noted that the Federal government played a vital leadership role in making provisions to "meet the needs of key groups of students such as the gifted and talented, the socioeconomically disadvantaged, minority and language minority students, and the handicapped" (US Govt. Pubs: <http://www2.ed.gov/pubs/NatAtRisk/recomm.html>).

Due in part because of the fears evoked by *A Nation at Risk*, P.L. 99-457 otherwise known as the Infants and Toddlers with Disabilities Education Act (1986) extended the rights, provisions, and safeguards within EAHCA to encompass children from birth to age five. Meanwhile, challenges to the Education of All Handicapped Children Act (which later would become the Individuals with Disabilities Education Act, or IDEA) were brought to the courts. In the *Board of Education of the Hendrick Hudson School District v. Rowley* (1982), for example, a local school board refused the request to provide an academically accomplished deaf child with an interpreter. While the deciding judge noted that the law did require school districts to provide reasonable opportunities for students with disabilities to learn, it did not require schools to help them reach their maximum potential.

In general, the type, level, and placement of educational services for students with disabilities became increasingly debated in the public discourse, as numbers of students labeled as eligible for special education swelled and a segregated system of a system-within-a-system emerged. By the mid-1980s, for example, Gartner and Lipsky noted, "Overall, 74 percent of special education students are in pull-out or separate programs" (374). Furthermore, the demographics of segregated placements revealed consistent patterns of disproportionate labeling minorities in categories of emotional disturbance, mental retardation, and learning disability (Brosnan; Carrier; Wang, Reynolds, and Warburg). Around this time, Madeline Will, assistant secretary to the US Department of Education, introduced the Regular Education Initiative (REI), whose primary goal was to include students with mild to moderate categories to address the problem of how schools had "unwittingly [created] barriers to their successful inclusion" (Will, 412). Tellingly, federal data on schools omitted statistics on students with disabilities in general education settings (Sapon-Shevin). The omission reveals an example of

what Beratan ("Institutionalizing Inequity") has noted, namely that despite best intentions, IDEA "embeds unintentional discrimination within the policies, structures and practices of the educational system...the institutions themselves (policies, practices, schools) become instruments of discrimination despite their stated purpose to end discrimination" (Beratan 1), and while students are rearranged, the significance of segregated space is still the same ("The Song Remains the Same").

The REI intensified the debate around the inclusion of students with disabilities in general education classrooms. Previously, students had been "mainstreamed" if they could complete academic work with little or no accommodations. Proponents of inclusion, in contrast, acknowledged that students with and without disabilities in the same classrooms could benefit from working either on the same or different goals, emphasizing the commonalities among people rather than labeling and segregating (Salend, 1st Ed.). However, it soon became clear that the topic of inclusion divided the field of education, with some of the strongest critics of inclusive practices coming from *within* the field of special education (Fuchs and Fuchs; Kauffman and Hallahan). As Beratan has argued ("Institutionalizing Inequity"), ableism and racism are combined in subtle but potent ways within legislation such as IDEA—"protecting rights," while simultaneously making children vulnerable to segregation from non-disabled and majority white counterparts.

Multiculturalism also rose to prominence in the 1980s. With its African American roots, the multicultural movement in education grew significantly (Banks), advocating for the acceptance on multiple ethnic cultures, recognizing the value of diversity and the potential limitations of total assimilation (Reagan). Multiculturalism spanned a range of diverse issues such as: the relationship of schools in a democracy (Guckert); the purpose of schooling (Lee); the impact of school structures (Goodlad); the role of school change (Baptiste); changing notions of literacy (Philips); culturally relevant pedagogy (Ladson-Billings); culturally relevant content across the curriculum (Atwater; Brown); teacher ethnicity (Banks and Banks); teacher education (Grant); Whiteness (Stalvey); poverty (Mosley and Lex); and, disability (Slade and Conoley); as well as racial and ethnic representation across the curriculum (Garcia; Mock); in elementary texts (Grant and Grant); in the media (Thoman and Silver); and, in resistance toward robust forms of multiculturalism (Sleeter and Grant). Detractors of multiculturalism saw it as a threat to traditional notions of cultural

literacy, core values, and the erosion of long held standards (Hirsch). Proponents saw multiculturalism as accurately representing the diversity of cultures within society, and the opportunity to provide alternative perspectives and multiple understandings (Zinn).

1990s

It was not until the last decade of the twentieth century that the American with Disabilities Act (ADA) was passed (in 1990). Viewed as a major step toward protecting the rights of people with disabilities, the ADA required employers, agencies, public accommodations, transportation, and communications from discriminating against qualified individuals with disabilities. Encompassing "job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment," (US Equal Opportunity Commission) the ADA impacted almost all existing work environments. Unless an employer had less than 15 employees, every employer was to provide "reasonable accommodations" of a qualified employee or applicant, unless it would impose an "undue hardship" on the business operations of the employer. The interpretation of these two phrases (otherwise qualified and reasonable accommodation) has subsequently served as the basis of countless court cases (Russell).

During the same year, P.L. 94-142 was reauthorized into P.L. 101-476 and renamed The Individuals with Disabilities Act of 1990. Some of the changes included: the language of the law to reflect "individuals first" language; disability categories expanded to include autism and traumatic brain injury; rehabilitation counseling and social work services were added; and transition services were required as part of the IEP for students aged 16 and over (Salend, 5th Edition, 26). The law also strengthened the commitment of meeting the needs of culturally and linguistically diverse students with disabilities and their families—indicating an explicit awareness of the perceived (erroneous) link between race, ethnicity, and disability. Changes included schools being expected to: communicate with parents in languages other than English; use a wider range of assessment tools; develop a greater awareness of multicultural issues—such as the beliefs, behaviors, expectations of families—and how they potentially impact all aspects of education, from teaching methods to degrees of assimilation into mainstream culture, both expected by schools and desired by families.

The Inclusion Movement also gained strength, including the concept of *full inclusion*, characterized by Sailor (1991) as possible through a zero reject policy, the attendance of students with disabilities in their neighborhood schools, a "natural proportion" of disabled and nondisabled students together, age appropriate placements, no self-contained classes, and special education support provided in integrated learning environments. In response, most professional disability-related organizations released position statements, varying enormously in their response (Lipsky and Gartner). Major legal cases such as *Oberti v. Board of Education of the Borough of Clementon School District* (1993), in which the parents of a son with Down syndrome fought for his inclusion, gained national attention in ongoing coverage by the *New York Times* and television appearances of family members. At the same time, the growing numbers of students in special education, complete with the spiraling costs to keep them there, became a national concern. A *U.S. News & World Report* article noted the number of students of color in segregated special education classes, declaring "nearly 40 years after *Brown v. Board of Education*, the U.S. Supreme Court's landmark school desegregation ruling, Americans continue to pay for and send their children to classrooms that are often separate and unequal" (Shapiro et al., 4). On television, the provocatively titled Merrow Report asked: "What's So Special About Special Education?" (May 12, 1996) in which critics likened special education to "welfare annexes" and "dead ends." Increasingly, it became clear that while enabling some members of the population, special education had also evolved to disable others, contributing to the production of a racially-biased "school-to-prison pipeline."

The tenacious hold of biological determinism based in eugenicist thinking raised its head once again in Herrnstein and Murray's (1994) widely promoted book, *The Bell Curve*, which renewed the pseudo-scientifically-based claim of innate differences among "races" and resurrected (or more realistically, reinforced) predictable racial hierarchies of ability. Around the same time, Delpit's (1995) *Other People's Children: Cultural Conflict in the Classroom*, ignited debates about the need for cultural awareness and responsiveness to "difference" in schools. She pointed out the complexities of negotiating the cultural space of American classrooms in which 90 percent of the teaching force are white females and 40 percent of students are children of color, raising a host of issues from deep structural inequities to culturally responsive pedagogy.

In 1997, P.L. 105-17 or The Individuals with Disabilities Education Act Amendments included numerous provisions in the reauthorization of IDEA. Among them, students with disabilities would now be included in state and district assessments. Other provisions renewed guidelines for disciplining students with disabilities, revised eligibility requirements that prohibited students being identified with a disability if they had not received adequate instruction in reading or mathematics, or were instructed in their native language and, required states and school districts to collect and analyze local data about disproportionate representation. All of these changes raised questions about who gets labeled disabled, how it happens, and where they are placed—revealing broad concerns with the special education system.

Finally, during the 1990s, in many ways a response to *A Nation At Risk* (1983), Whole School Reform (sometimes referred to as a comprehensive school movement) gained appeal in the form of charter schools. In establishing charter schools, reformers sought to change many traditional elements in public schools. Research on charter schools during this decade is mixed (Goldhaber) and while they have been credited for raising children's self-esteem and academic scores, they have been criticized for being overly demanding, "colonizing" children of color, cherry picking students, and sidestepping laws by starting schools without children with disabilities (Sweet). Charter schools are often viewed as part of a neoliberalist influence upon education, allowing the economic interests of the marketplace supersede basic governmental responsibilities for the public good.

2000s

At the turn of the twenty-first century, the schism within the field of education was captured in "The Special Education Divide," a short article by Andrews et al. in which some of the leading scholars in the field outlined two radically different paradigms—the traditionalist and the reconceptualist. Each "side" of special education articulated their perspective on (1) the conceptualization of disability; (2) the purpose of special education; (3) beliefs about the expected outcomes of special education; (4) the current state of knowledge about special education practice; and, (5) necessary steps for improving special education. In brief, traditionalists sought to reaffirm scientific understandings of disability and focus on interventions and

promising practices, whereas the reconceptualists urged for a more holistic understanding of disability as human diversity and the social implications, including stigmatization associated with labels, and complicating issues of race and social class.

The beginning of the decade was also marked by the passing of the far-reaching No Child Left Behind Act of 2001. The act sought to improve the performance of America's elementary and secondary school children, while ensuring that no child would be forced to stay in a "failing school." The increased accountability of schools was placed upon every state, making them responsible for implementing accountability systems for all public schools and each individual student in that state. State systems were developed to meet challenging standards in mathematics and reading, with annual tests for students in grades three through eight. Among other criteria, annual state-wide progress was premised upon all children completing their public schooling within 12 years. (Results of state assessments are published widely, and tied to the continuing employment of administrators, and soon, teachers). Another element of NCLB is the greater flexibility for states, school districts, and schools in how they spend federally appropriated funds, including the option of creating charter schools. Another element of NCLB was the *Reading First* initiative, which increased federal investment in "scientifically-based reading instruction programs," particularly in the earlier grades. While the act represents a conscious effort to reduce the number of children who become labeled disabled through poor reading instruction in the early years, NCLB reified that reading can be taught and learned in easy-to-follow steps without the complication and consideration of culture, context, teacher, school, and learner.

The reauthorization of IDEA in 2004 as The Individuals with Disabilities Education Improvement Act (IDEIA) contained numerous expansions and amendments, including becoming more aligned with NCLB, such as statewide and local assessments and issues of personnel qualifications. One of the many amendments of IDEIA included "Child Find," that is, the inclusion of children attending private schools who can now receive special education services.⁹ Another amendment was included to push states to address the over identification of African American children as ED and MR/CI, and their placement in segregated settings. Another provision involved a move away from using a discrepancy model (based on measured IQ and achievement) when identifying students with specific LD. Instead, the response to Intervention (RtI) is promoted, in part, as an

alternative to the discrepancy model of LD and a system to provide early assistance to children struggling in reading. RtI has been both lauded (Glover and Vaughn) and criticized (Ferri), but is likely to redefine educational practices in general education in the early grades.

The field of Disability Studies in education (DSE) also emerged during this decade. DSE scholars and their allies continued to call attention to the relentless subjectification of bodies within schools based on a mythical norm. For instance, Baker's "The Hunt for Disability: The New Eugenics and the Normalization of School Children" (2002) analyzed the everyday school processes of (dis)abling children, such as "dividing, sorting, and classifying practices," and reconsidered them through "an analysis of old and new discourses of eugenics as 'quality control' of national populations" (663). Additionally, the work of Blanchett has shown how many disability categories have different implications for different "races" in terms of accommodation, placements, and college preparation, echoing Baker's concern that the existing systems and structures are more part of the problem than the solution. In their seminal publication, *Why Are So Many Minority Students in Special Education?* Harry and Klingner dug deep beneath the surface of schooling practices, exposing both systematic flaws and individual responsibilities. They also reminded the reader of larger, related issues *outside* of schools, commenting:

The overrepresentation of minorities in special education is not a phenomenon that exists in a vacuum. Indeed minorities are overrepresented in many of society's most detrimental circumstances, such as the justice system and among the homeless, while being underserved by the health care system and underrepresented in the nation's most powerful institutions, such as the U.S. Senate and the leading television networks (Harry and Klingner 182)

Despite this critical turn in special education research, students of color continue to be treated differently outside of school as well as inside. The grass roots movement *Padres y Jovenes* (Parents and Youth) demonstrated that police officers ticketed brown and black students more frequently than their white counterparts, even for the same minor infractions. The trend of early ticketing triggered more punitive outcomes for students of color, including a faster introduction to the penal system (<http://www.stopschoolsto jails.org/padres-jovenes-unidos-denver.html>). On an optimistic note, this intergenerational

organization mobilized to bring awareness to these issues and promote peace making among gangs.

In 2007, several amendments were made to IDEIA, including a provision for students with multiple and severe disabilities to receive alternative assessments. Additionally, *Schaffer v. West* (2005) ruled that the burden of proof, which was heretofore placed on the school, now fell on the party initiating a hearing, which is usually the parent. This ruling appears historically inconstant with the rights of parents under IDEIA and proportionately effects working class and poor families, and families of color (Ginsburg and Rapp) who may not be able to secure adequate representation.

At the close of 2010, research in the field of special education has remained largely impervious to change. The field continues to conceptualize disability only as a deficit within a student and adheres to a scientific-based positivism that undergirds its theory, research, policy, and practice (Connor and Ferri). Nonetheless, inroads have been made by alternative fields, such as Disability Studies in education, (Danforth and Gabel), and a small but solid constellations of critical special educators who have always challenged its self imposed "orthodoxy" (Gallagher, Heshusius, Iano, and Skrtic). Recently, the work of Arzubriga, Artiles, King, and Harris-Murri holds much promise as they seek to hold special education to the criteria that all research is a cultural act, including the use of theoretical categories, data collection, and analytic tools. They note:

This notion challenges researchers to widen the analytic spotlight from a focus on certain groups to shed light on two additional aspects, namely, the sociocultural location of the researcher as a cultural being and member of a scientific field, and the cultural presuppositions in a field's habitual practices (309).

In their analysis of research on overrepresentation, Artiles et al. make the point that previous studies miss the mark because the field's "reluctance to frame disproportionality as a problem stresses technical arguments that ignore the role of historical, contextual, and structural forces" (p. 282). Culling from Tate, Ladson-Billings, and Grant's analysis of the implementation of *Brown v. Board of Education*, Artiles et al. conclude that researchers cannot "Mathematize social problems with deep structural roots because such calculations are not likely to unearth historical precursors and ideologically laden processes that constitute them" (296).

Conclusion

Our previous work in analyzing the phenomenon of overrepresentation focused primarily on the history of special education after the historic *Brown v. Board of Education* decision (Ferri and Connor). In this chapter, however, we wanted to contemplate the entwined nature of race and disability a bit further back into history, as we believe the dispositions and attitudes of individuals are profoundly shaped by deeply ingrained cultural belief systems that are predicated on the ideology of white supremacy. The implications of thinking about the longstanding effects of racial hierarchies continue to be enormous. In the space of a chapter, we can only scratch the surface of this history and point to moments when race and ability seem to be enmeshed, entangled, or overlapping. However, in order to continue this conversation we end with some questions that help to tease out the implications for theory, research, policy, and practice:

- In what ways can theories of difference among humans within educational theory—and other academic fields—be more equitable and fair?
- In what ways can scientifically framed research be challenged as a cultural process, informed by ideologies of race and ability, and far from objective?
- In what ways can education programs shift toward enculturating new teachers into welcoming difference and diversity in children and youth, and away from viewing students of color and/or who have disabilities through a deficit lens?
- In what ways, small and large, can educators in their classrooms challenge the historical, cultural, institutional, local, and school levels of racism and ableism?

We take heart in the fact that within Disability Studies (Brantlinger; Dudley-Marling and Gurn; Gabel and Danforth; Erevelles; Gallagher; Ware), among critical special educators (Artiles, Kozleski, and Waitoller; Harry and Klingner), and across allies forging interdisciplinary connections (Leonardo and Broderick; Blanchett; Sleeter, "Building Counter"), scholars have worked within, and continue to engage with, these topics and numerous areas related to them. Recently, for instance, we have attempted to further discussion about the race-disability nexus by proposing a theoretical framework

termed DisCrit that combines elements from Disability Studies and Critical Race Theory—in which we contend that race and dis/ability cannot be disaggregated within discussions of either race or ability (Annamma, Connor, and Ferri). We hope that this critical framework will help scholars continue with more nuanced, intersectional work than either discipline has demonstrated to date.

In closing, part of our rationale for providing this brief tour through time has been for readers to further reflect upon the issues raised and their connections to the American “norm,” the ideal child, the molding of desirable citizens, the determination of what constitutes healthy bodies and minds, and their relation to cultural understandings of what constitutes a “normal child” (Baglieri, Bejoian, Broderick, Connor, and Valle). Invariably, all of these concepts are irrefutably connected to issues of race and dis/ability, who fits where (and who does not) within the institution of school, and by extension, who fits (and who does not) into society at large. We acknowledge that challenging dual systems of racism and ableism—manifest in many ways, including the overrepresentation of students of color—is enormous. However, if we choose not to challenge these systems within research, theory, policy, and practice, our indifference actively contributes to the current status quo and the ongoing perpetration of historical inequities.

Notes

1. In 1790, Congress wrote its first words on the subject of citizenship that restricted naturalization to “white persons.” Although requirements for naturalization changed over time, this racial prerequisite remained on the books until 1952, leading Haney López (1996) to conclude, “From the earliest years of this country until just a generation ago, being a ‘white person’ was a condition for acquiring citizenship” (p. 1).
2. A compromise between northern and southern States at the Philadelphia Convention of 1787, slaves were to be counted as three-fifths of a person in regard to the distribution of taxes and allotting members of the House of Representatives.
3. Defining this “ancient relation” was hypocritical, given the historical raping of female slaves by their masters for their own pleasure and economic gain.
4. For an excellent digital collection on American eugenics see the Image Archive of the American Eugenics Movement at <http://www.eugenicsarchive.org/eugenics/>

5. The symbolism of “Black” is reflective of the wider cultural use in English that associated blackness with negativity, undesirability, impurity, death, etc.
6. Despite the “evidence” presented at trial, Carrie’s illegitimate child was not the result of promiscuity, but of the alleged rape by a nephew of her foster parents. School records also call into question the claim that Vivian was “feeble-minded.” After she was sterilized, Carrie was released from the institution, married a police officer, and from all accounts led what would be considered a typical life. Her daughter Vivian was taken in by her former foster parents who raised her until she died at age eight (Lombardo, 2008).
7. Some accounts trace the AAIDD back to 1876 at the first meeting of the Association of Medical officers of American Institutions for Idiotic and Feeble-minded Persons at the Elwyn Training School in Pennsylvania (Hollander, 1986).
8. Other accounts note that the term was used in his written work since 1962 (Bateman, 2005/LDQ).
9. Child Find also includes children who are homeless and wards of the state.

References

- A Nation at Risk: The Imperative for Educational Reform*. Washington DC: National Commission on Excellence in Education, 1983.
- Adams, Rachel. *Sideshow U.S.A.: Freaks and the American Cultural Imagination*. Chicago, IL: University of Chicago Press, 2001.
- Allen, Edward E. *Education of Defectives*. Albany: J.B. Lyon, 1904.
- Allen, Garland E. “The Eugenics Record Office at Cold Spring Harbor, 1910–1940: An Essay in Institutional History.” *Osiris* 2 (1986): 225–64 (University of Chicago Press).
- Allen, James. *Without Sanctuary: Lynching Photography in America*. Santa Fe, NM: Twin Palms, 2000.
- Americans with Disabilities Act of 1990, ADA 42 U.S. Code Chapter 126 (P.L. 101–476).
- Andrews, Jack E., Douglas W. Carnine, Martha J. Coutinho, Eugene B. Edgar, Steven R. Forness, Lynn Fuchs, et al. “Bridging the Special Education Divide.” *Remedial and Special Education* 21.5 (2000): 258–60, 267.
- Annamma, Subini, David J. Connor, and Beth A. Ferri. “Dis/ability Critical Race Studies (DisCrit): Theorizing at the Intersections of Race and Disability.” *Journal of Race, Ethnicity, and Education*. (in press).
- Artiles, Alfredo J. and Alba A. Ortiz. (Eds.). *English Language Learners with Special Education Needs* [Report]. Washington D.C.: Center for Applied Linguistics, 2002.

- Artiles, Alfredo J., Elizabeth B. Kozleski, Stanley C. Trent, David Osher, and Alba Ortiz. "Justifying and Explaining Disproportionality, 1968-2008: A Critique of Underlying Views of Culture." *Exceptional Children* 76.2 (2010): 279-99.
- Artiles, Alfredo J., Elizabeth B. Kozleski, and Federico R. Waitoller. (Eds.). *Inclusive Education: Examining Equity on Five Continents*. Cambridge, MA: Harvard Education Press. 2012.
- Arzuviaga, Angela E., Alfredo J. Artiles, Kathleen King, and Nancy Harris-Murri. "Beyond Research on Cultural Minorities: Challenges and Implications of Research as Situated Cultural Practice." *Exceptional Children* 74.3 (2008): 309-27.
- Atwater, Mary M. "Including Multicultural Education in Science Education: Definitions, Competencies, and Activities." *Journal of Teacher Science* 1.1 (1989): 17-19.
- Baglieri, Susan, Lynne Bejoian, Alicia Broderick, David J. Connor, and Jan Valle. "[Re]claiming 'Inclusive Education' Toward Cohesion in Educational Reform: Disability Studies Unravels the Myth of the 'Typical Child.'" *Teachers College Record* 113.10 (2011): 2122-54.
- Baker, Bernadette. (2002). "The Hunt for Disability: The New Eugenics Movement and the Normalization of School Children." *Teachers College Record* 104.4 (2002): 663-703.
- Banks, James A. "The African American Roots of Multicultural Education." *Multicultural Education, Transformative Knowledge, and Action: Historical and Contemporary Perspectives*. New York: Teachers College Press. 1996. 251-77.
- Banks, James A. and Cherry M. Banks. *Multicultural Education: Issues and Perspectives*. Needham Heights, MA: Simon and Schuster, 1989.
- Baptiste, H. Prentice. "Multicultural Education and Urban Schools from a Sociohistorical Perspective: Internalizing Multiculturalism." *Journal of Educational Equity and Leadership* 6.4 (1986): 295-312.
- Baynton, Douglas. "Disability and the Justification of Inequality in American History." *The New Disability History: American Perspectives*. Ed. Paul K. Longmore and Lauri Umansky. New York: New York UP, 2001. 33-57.
- Beratan, Gregg. "Institutionalizing Inequity: Ableism, Racism and IDEA 2004. Disability." *Studies Quarterly*, 26.2 (2006): <http://dsq-sds.org/article/view/682/859>
- Beratan, Gregg. "The Song Remains the Same: Transposition and the Disproportionate Representation of Minority Students in Special Education." *Race Ethnicity and Education*, 11.4 (2008): 337-54.
- Binet, Alfred and Theodore Simon. *A Method of Measuring the Development of the Intelligence of Young Children*. Lincoln, IL: Courier, 1911.
- Black, Edwin. *War Against the Weak: Eugenics and America's Campaign to Create a Master Race*. New York: Four Walls, Eight Windows Press, 2003.
- Blanchett, Wanda. (2010). "'Telling It Like It Is': The Role of Race, Class, and Culture in the Perpetuation of Learning Disability as a Privileged Category for the White Middle Class." *Disability Studies Quarterly* 30.2 (2010): <http://www.dsqsds.org/article/view/1233/1280>.
- Blatt, Burton and Fred Kaplan. *Christmas in Purgatory: A Photographic Essay on Mental Retardation*. Boston: Allyn and Bacon, 1966.
- Board of Education of the Hendrick Hudson School District v. Rowley (1982) 458 U.S. 176; 102 S. Ct. 3034; 73 L. Ed. 2d 690.
- Boston Public Schools (n.d.). retrieved on June 26, 2010 from <http://www.bostonpublicschools.org/>
- Brantlinger, Ellen A. "Using Ideology: Cases of Nonrecognition of the Politics of Research and Practice in Special Education." *Review of Educational Research* 67.4 (1997): 425-59.
- Brosnan, Faye L. "Overrepresentation of Low-Socioeconomic Minority Students in Special Education Programs in Canada." *Learning Disability Quarterly*, 6.4 (1983): 517-25.
- Brown, Susan. "Multiculturalism through the Visual Arts: A High School Course." *Multiculturalism/Multiculturalisme* 7.1 (1983): 13-14.
- Browning, Tod (director). *Freaks*. Metro Golden Mayor [Motion Picture]. 1932.
- Buck v. Bell (1927). 274 U.S. 200. Retrieved on June 17, 2010 from http://www.law.cornell.edu/supct/html/historics/USSC_CR_0274_0200_ZO.html
- Carrier, James. *Learning Disability: Social Class and the Construction of Inequality in American Education*. New York: Greenwood Press, 1986.
- Chorover, Stephen L. *From Genesis to Genocide*. Cambridge, MA: Massachusetts Institute of Technology Press, 1979.
- Connor, David J., and Beth A. Ferri. "Introduction to DSQ Special Issue: 'Why is There Learning Disabilities?—Revisiting Christine Sleeter's Socio-political Construction of Disability Two Decades On.'" *Disability Studies Quarterly*, 30.2 (2010): <http://www.dsqsds.org/article/view/1229/1276>
- Cronin, Joseph M. *Reforming Boston Schools, 1930-2006*. New York: Palgrave Macmillan, 2008.
- Danforth, Scot. *The Incomplete Child: An Intellectual History of Learning Disabilities*. New York: Peter Lang, 2009.
- Danforth, Scot and Susan L. Gabel. (Eds.) *Disability and the Politics of Education: An International Reader*. New York: Peter Lang, 2008.
- Davenport, Charles B. *Heredity in Relation to Eugenics*. New York: Henry Holt. 1911.
- Davis, Angela. *Women, Race, and Class*. London: Women's Press, 1981.
- Delpit, Lisa. *Other People's Children: Cultural Conflict in the Classroom*. New York: New Press, 1995.
- Deschenes, Sarah, Larry Cuban, and David Tyack (2001). "Mismatch: Historical Perspectives on Schools and Students Who Don't Fit Them." *Teachers College Record*, 103.4 (2001): 525-47.
- Diana v. State Board of Education (1970) CA 70 RFT.

- Dorn, Sherman, Douglas Fuchs, and Lynne S. Fuchs. "A Historical Perspective on Special Education Reform." *Theory Into Practice*, 35.1 (1996): 12-19.
- Dudley-Marling, Curt and Alex Gurn. (Eds). *The Myth of the Normal Curve*. New York: Peter Lang, 2011.
- Dunn, Lloyd M. "Education for the Mentally Retarded: Is Much of it Justifiable?" *Exceptional Children*, 35.1 (1968): 5-22.
- Education for All Handicapped Children Act of 1975, PL 94-142, 20 U.S.C. 1400 et seq.
- Brevelles, Nirmalla. *Disability and Difference in Global Contexts*. London: Palgrave MacMillan, 2011.
- Ferri, Beth A. "Undermining Inclusion? A Critical Reading of Response to Intervention (RTI)." *International Journal of Inclusive Education*, 16.8 (2011): 863-80.
- Ferri, Beth A. and David J. Connor. *Reading Resistance: Discourses of Exclusion in Desegregation and Inclusion Debates*. New York: Peter Lang, 2006.
- Fleischer, Doris and Frieda Zames. *The Disabilities Rights Movement: From Charity to Confrontation*. Philadelphia, PA: Temple University Press, 2001.
- Flesch, Rudolf. *Why Johnny Can't Read and What You Can Do About It*. New York: Harper and Brothers, 1955.
- Franklin, Barry. *From "Backwardness" to "At Risk": Childhood Learning Difficulties and the Contradictions of School Reform*. Albany, NY: SUNY Press, 1994.
- Franklin, V. P. "Introduction: *Brown v. Board of Education*—Fifty Years of Educational Change in the United States." *Journal of African American History* 90.1-2 (2005): 1-8.
- Fuchs, Douglas and Lynne Fuchs. (1995). "Inclusive Schools Movement and the Radicalization of Special Education Reform." *The Illusion of Full Inclusion: A Comprehensive Critique of a Current Special Education Bandwagon*. Ed. James M. Kauffman and Daniel P. Hallahan. Austin, TX: ProEd. 1995. 213-42.
- Gabel, Scot and Susan Danforth. (Eds.) *Vital Questions for Disability Studies in Education*. New York: Peter Lang, 2006.
- Gallagher, Deborah, Lous Heshusius, Richard P. Iano, and Thomas Skrtic. *Challenging Orthodoxy in Special Education*. Denver, CO: Love, 2004.
- Gallagher, Deborah J. "Hiding in Plain Sight: The Nature and Role of Theory in Learning Disability Labeling." *Disability Studies Quarterly*, 30.2 (2010). Retrieved on September 15, 2011 from: <http://www.ds-q-sds.org/>.
- Garcia, Jesus. "Does 'Charting a Course' Include a Multiethnic Perspective?" *Social Education*, 54.7 (1990): 444-6.
- Gartner, Alan and Deborah K. Lipsky. "Beyond Special Education: Toward a Quality System for All Students." *Harvard Education Review* 57.4 (1987): 367-95.
- Garland Thomson, Rosemarie. (Ed.). *Freakery: Cultural Spectacles of the Extraordinary Body*. New York: New York University Press, 1998.
- Goldhaber, Dan D. (1999). "School Choice: An Examination of the Empirical Evidence on Achievement, Parental Decision Making, and Equity." *Educational Researcher*, 28.9 (1999): 16-25.
- Goodlad, John. "Introduction: The Uncommon Common School." *Education and Urban Society* 16.3 (1984): 243-52.
- Giordano, Gerard. *How Testing Came to Dominate American Schools*. New York: Peter Lang, 2005.
- Ginsburg, Faye and Rayna Rapp. "The Social Distribution of Moxie: The Legacy of Christine Sleeter." *Disability Studies Quarterly*, 30.2 (2010): <http://www.ds-q-sds.org/article/view/1239/1284>
- Glover, Todd A. and Sharon Vaughn. (Eds). *The Promise of Response to Intervention: Evaluating Current Science and Practice*. New York: Guildford, 2010.
- Goddard, Henry H. *The Kallikak Family: A Study in the Heredity of Feeble-Mindedness*. New York: MacMillan, 1912.
- Gould, Stephen J. *The Mismeasure of Man*. New York: Norton, 1996.
- Grant, Madison. *The Passing of the Great Race or the Racial Basis of European History*. New York: Charles Scribners and Sons, 1921.
- Grant, Carl A. "Education that is Multicultural and Teacher Preparation: An Examination from the Perspectives of Preservice Students." *Journal of Educational Research* 75.2 (1981): 95-101.
- Grant, Carl A. and G. W. Grant. "The Multicultural Evaluation of some Second and Third Grade Textbook Readers—A survey Analysis." *Journal of Negro Education* 50.1 (1981): 63-74.
- Guckert, John C. "Multiculturalism—A Democratic Approach to Education." *Scholar and Educator* 6 (1982): 37-41.
- Gutiérrez, David G. *Walls and Mirrors: Mexican Americans, Mexican Immigrants, and the Politics of Ethnicity*. Berkeley, CA: University of California Press, 1995.
- Harry, Beth and Janette Klingner. *Why Are So Many Minority Students in Special Education?* New York: Teachers College Press, 2006.
- Herrnstein, Richard J. and Charles Murray. *The Bell Curve: Intelligence and Class Structure in American Life*. New York: Simon and Schuster, 1994.
- Hirsch, Eric D. *Cultural Literacy*. New York: Knopf Doubleday, 1988.
- Hollander, Russell. "Mental Retardation and American Society: The Era of Hope [1840-1860]." *Social Service Review*, 60 (1986): 395-420.
- Hollingworth, Leta S. *Gifted Children: Their Nature and Nurture*. New York: MacMillan, 1926.
- Horn, Margo. *Before it's Too Late: The Child Guidance Movement in the United States 1922-1945*. Philadelphia: Temple University Press, 1989.
- Individuals with Disabilities Education Act*. 1990
- Individuals with Disabilities Education Improvement Act (IDEIA)*. 2004

- Infants and Toddlers with Disabilities Education Act*. P.L. 99-457. 1986.
- Jacoway, Elizabeth C. and C. Fred Williams. (Eds.). *Understanding the Little Rock Crisis: An Exercise in Remembrance and Reconciliation*. Fayetteville, AR: University of Arkansas Press. 1999.
- Jones, James H. *Bad Blood: The Tuskegee Syphilis Experiment*. London: Collier Macmillan, 1981.
- Kauffman, James M. and Daniel P. Hallahan. (Eds.). *The Illusion of Full Inclusion: A Comprehensive Critique of a Current Special Education Bandwagon*. Austin, TX: ProEd. 1995.
- Kennedy, John F. 1963. Retrieved on June 16, 2010 from: <http://www.jfklibrary.org/Historical+Resources/JFK+in+History/Mental+Retardation.htm>
- Korematsu v. The United States (1944). Retrieved on June 29, 2010 from <http://caselaw.lp.findlaw.com/scripts/getcase.pl?court=US&vol=323&invol=214>
- Kuhl, Stefan. *The Nazi Connection: Eugenics, American Racism, and German National Socialism*. New York: Oxford University Press, 2002.
- Ladson-Billings, Gloria. "Reading between the Lines and Beyond the Pages: A Culturally Relevant Approach to Literacy Teaching." *Theory Into Practice* 31.4 (1992): 312-20.
- Larry P. v. Wilson Riles (1982) 793 F.2d 969.
- Lau v. Nichols (1974) 414 U.S. 513.
- Lee, Mildred K. (1983). "Multiculturalism: Educational Perspectives for the 1980s." *Education*, 103.4 (1983): 405-9.
- Leonardo, Zeus and Alicia Broderick. "Smartness as Property: A Critical Exploration of Intersections between Whiteness and Disability Studies." *Teachers College Record* 113.10 (2011). Retrieved September 15, 2011 from: <http://www.tcrecord.org> ID 16431
- Lipsky, Dorothy K. and Alan Gartner. (1997). *Inclusion and School Reform: Transforming America's Classrooms*. Baltimore: Paul Brookes, 1997.
- Linton, Simi. *Claiming Disability*. New York: New York University Press, 1998.
- Lomawaima, K. Tsianina. "Domesticity in the Federal Indian Schools: The Power of Authority over Mind and Body." *Deviant Bodies*. Ed. Jennifer Terry and Jacqueline Urla. Bloomington, IN: Indiana University Press. 1995: 197-218.
- Lombardo, Paul. *Three Generations, No Imbeciles: Eugenics, the Supreme Court, and Buck v. Bell*. Baltimore, MD: John Hopkins University Press, 2008.
- Loving v. Virginia (1967) 388 US 1
- Losen, Daniel J. and Gary Orfield. (Eds.) *Racial Inequality in Special Education*. Cambridge, MA: Harvard University Press, 2002.
- MacMillan, Donald L., Irving G. Hendrick, and Alice V. Watkins. "Impact of Diana, Larry P. and P. L. 94-142 on Minority Students." *Exceptional Children* 54.5 (1988): 426-32.
- Méndez v. Westminster School Dist. of Orange County (1946), 64 F.Supp. 544 (D.C.CAL.)
- Mills v. Board of Education of the District of Columbia*, 348 F. Supp. 866, (D. DC 1972).
- Mitchell, David and Sharon Snyder. (Producers). *A World without Bodies*. Film: A Brace Yourselves Production, 2002.
- Mock, Karen. "Early Childhood Education in a Multicultural Society." *Multiculturalism* 5.4 (1982): 3-6.
- Mosley, John C. and Andrea Lex. "Identification of Potentially Stressful Life Events Experienced by a Population of Urban Minority Youth." *Journal of Multicultural Counseling and Development* 18.3 (1990): 118-25.
- No Child Left Behind Act* (2001)
- Noguera, Pedro. *Unfinished Business: Closing the Racial Achievement Gap in Our Schools*. San Francisco, CA: Jossey Bass, 2006.
- Nott, Josiah C. and George R. Gliddon. *Types of Mankind*. Philadelphia, PA: Lippincott. 1854.
- Oberti v. Board of Education of the Borough of Clementon School District* (1993) 995 F.2d 1204.
- Orfield, Gary and Susan E. Eaton. *Dismantling Desegregation: The Quiet Reversal of Brown v. Board of Education*. The New Press: New York, 1996.
- Pace v. Alabama* (1883) 106 U.S. 583.
- PARC v. Pennsylvania* (1971). 334 F. Supp., 1257 (E.D. PA 1972).
- Philips, Susan U. *The Invisible Culture: Communication in Classroom and Community on the Warm Springs Indian Reservation*. Prospect Heights, IL: Waveland. 1983.
- Proctor, Robert N. (1995). "The Destruction of 'Lives Not Worth Living.'" *Deviant Bodies*. Ed. Jennifer Terry and Jacqueline Urla. Bloomington, IN: Indiana University Press. 1995. 170-96.
- Racial Integrity Act* (1924). Retrieved on June 15, 2010 from http://www2.vcdh.virginia.edu/encounter/projects/monacans/Contemporary_Monacans/racial.html
- Reagan, Timothy. (1984). "Multiculturalism: An Educational Perspective." *Educational Studies: A Journal in the Foundations of Education*, 15.2 (1984): 101-7.
- Richardson, Lynda. "Experiment Leaves Legacy of Distrust of New AIDS Drugs." *New York Times*, p. A1. April 21, 1997.
- Ruiz, Vicki L. "South by Southwest: Mexican Americans and Segregated Schooling, 1900-1950." *OAH Magazine of History*, 15.2 (2001): 23-7.
- Russell, Marta. *Beyond Ramps: Disability at the End of the Social Contract*. Monroe, ME: Common Courage, 1998.
- Sailor, Wayne. "Special Education in the Restructured School." *Remedial and Special Education*, 12.6 (1991): 8-22.
- Salend, Spencer. *Creating Inclusive Classrooms: Effective and Reflective Practices for All Students* (1st ed.). Upper Saddle River, NJ: Pearson, 1990.
- Salend, Spencer. *Creating Inclusive Classrooms: Effective and Reflective Practices for All Students* (5th ed.). Upper Saddle River, NJ: Pearson, 2003.

- Sapon-Shevin, Mara. "The National Education Reports and Special Education: Implications for Students." *Exceptional Children* 53.4 (1987): 300-6.
- Schneider, Jack. "Escape from Los Angeles: White Flight from Los Angeles and its Schools, 1960-1980." *Journal of Urban History* 34.6 (2008): 995-1012.
- Selden, Steven. *Inheriting Shame: The Story of Eugenics and Racism in America*. New York: Teachers College Press, 1999.
- Shapiro, Joseph, Penny Loeb, David Bowermaster, Andrea Wright, Susan Headden, and Thomas Toch. "Separate and Unequal." *U.S. News & World Report*. 1993. Retrieved on June 28, 2010 from http://www.usnews.com/usnews/news/articles/931213/archive_016267.htm
- Slade, Jill C. and Colleen W. Conoley. (1989). Multicultural Experiences for Special Educators. *Teaching Exceptional Children* 22.1 (1989): 60-4.
- Sleeter, Christine E. "Why is There Learning Disabilities? A Critical Analysis of the Birth of the Field with its Social Context." *The Foundations of the School Subjects*. Ed. Thomas S. Popkewitz. London: Palmer Press. 1987. 210-37.
- Sleeter, Christine E. "Building Counter-Theory about Disability." *Disability Studies Quarterly* 30.2 (2010). Retrieved on April 21 from <http://dsq-sds.org/article/view/1244/1288>
- Sleeter, Christine E. and Carl A. Grant. "An Analysis of Multicultural Education in the United States." *Harvard Education Review* 57.4 (1987): 421-44.
- Smith, Moranda. *Address to the Congress of Industrial Organizations Annual Convention*. Final proceedings of the 9th Constitutional Convention of the CIO, Boston, October 15, 1947.
- Stalvey, Lois M. *The Education of a WASP*. Madison, WI: University of Wisconsin Press. 1989.
- Striker, Henri-Jacques. *A History of Disability*. Ann Arbor, MI: Love, 1999.
- Sweet, Kim. *Small Schools, Few Choices: How New York City's High School Reform Effort Left Students with Disabilities Behind*. New York: Parents for Inclusive Education, October 2006.
- Tate, William F., Gloria Ladson-Billings and Carl A. Grant. "The Brown Decision Revisited: Mathematizing a Social Problem." *Beyond Desegregation: The Politics of Quality in African American Schooling*. Ed. Mwalimu J. Shujaa. Thousand Oaks, CA: Corwin Press. 1996. 29-50.
- Terry, Jennifer and Jacqueline Urla. (Eds.). *Deviant Bodies: Critical Perspectives on Difference in Science and Popular Culture*. Bloomington, IN: Indiana University Press, 1995.
- Thoman, Elizabeth and Rosalind Silver. "Ethnic Diversity: Challenging the Media." *Media and Values* 43 (1988): 1-24.
- Trent, James W. "Defectives at the World's Fair: Constructing Disability in 1904." *Remedial and Special Education* 19.4 (1998): 201-11. Retrieved on June 28, 2010 from <http://rse.sagepub.com/cgi/content/abstract/19/4/201>
- US Holocaust Museum (n.d.) <http://www.ushmm.org/>
- US Holocaust Museum (n.d.) Retrieved on July 4 from: <http://www.jewish-virtuallibrary.org/js/source/Holocaust/disabled.html> [T4 program]
- US Justia (n.d.) *Nishimura Ekiu v. United States*, 142 U.S. 651 (1982). Retrieved on June 20, 2010 from <http://supreme.justia.com/us/142/651/case.html>
- Wang, Margaret C., Maynard C. Reynolds and Herbert J. Walberg. "Rethinking Special Education." *Educational Leadership* 44.1 (1986): 26-31.
- Ware, Linda (Ed.). *Ideology and the Politics of (In)Exclusion*. New York: Peter Lang, 2004.
- Washington, Harriet A. *Medical Apartheid: The Dark History of Medical Experimentation on Black Americans from Colonial Times to the Present*. New York: Random House, 2008.
- Wharton, Leopold and Theodore Wharton (directors). *The Black Stork*. Ithaca, NY: International Film Services, 1917.
- Will, Madeleine C. "Educating Children with Learning Problems: A Shared Responsibility." *Exceptional Children* 52 (1986): 411-15.
- Yerkes, Robert M. (Ed.). *Psychological Examining in the United States Army*. Memoirs of the National Academy of Sciences (vol. 15). 1921.
- Zinn, Howard. *A People's History of the United States: 1492-Present*. New York: Harper Perennial, 1980.