

Tools of Exclusion: Race, Disability, and (Re)segregated Education

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In this article we explore the dynamic interplay between racism and ableism—or discrimination against someone based on perceived “ability”¹—in the resistance to school desegregation and inclusion of students with disabilities in general education. In attending to the workings of power that connect these two histories, we show how racialized notions of ability functioned to uphold segregated schooling and justify the use of special education as a tool of racial resegregation. Moreover, we locate the current problem of overrepresentation of Black² students (and other students of color) in segregated special education classrooms to the connected discourses of segregation and exclusion. Recent efforts to challenge exclusionary practices in special education through the increased “inclusion” of students with disabilities in regular classrooms have resulted in resistance similar to that expressed in response to school desegregation shortly after Brown. In this article we first provide an overview of the complicated and intertwined histories of school desegregation and special education. Then, in the discursive context of a sample of very diverse newspapers, we examine how editors, readers and contributors responded to both court-ordered desegregation in the 1950s and then special education inclusion in the 1980s and 1990s by calling for delays and gradual compliance. We argue that gradualism has functioned to maintain, rather than disrupt, the status quo of racially segregated schooling both within and across schools. Finally, we argue that race and disability should be understood primarily as interactive social constructs and not distinct biological markers.

As we commemorate the 50th anniversary of the Supreme Court’s landmark *Brown* decision, the question naturally arises: What progress has been made toward integrated education? Recent statistics are not altogether encouraging and suggest that many gains have actually been lost. While the 1990s could be remembered as the decade when the United States became more diverse, it could also be remembered as the decade when the nation’s schools became increasingly racially segregated (Orfield, 2001).

Between 1954 and the present time, we must acknowledge not only the lack of progress toward racial integration in schools nationwide, but also the problem of overrepresentation of students of color in special education programs. Schools remain embarrassingly segregated, as do classrooms within schools. And despite special education policy's original intent as a legacy of *Brown* and a lever to give disabled students greater educational opportunity, it too has played a role in the insidious process of racial segregation.

Since the passage of the *Education of All Handicapped Children Act* (P.L. 94.142) in 1975, students with disabilities have been guaranteed a free and appropriate education in the least restrictive environment. Yet, nearly 30 years after the passage of this law (now referred to as the *Individuals with Disabilities Education Act*, or IDEA), many students with disabilities remain in educational settings separate from their non-disabled peers. Furthermore, Black students are overrepresented in nine of 13 disability categories and are more likely than their White peers to be placed in highly restrictive (exclusionary) educational settings (Losen, & Orfield, 2002).

We argue that overt racially segregating schooling practices have given way to largely under-acknowledged and more covert forms of racial segregation, including some special-education practices. Since the inception of special education, the discourses of racism and ableism have bled into one another, permitting forms of racial segregation under the guise of "disability."

In other words, as the practice of legally dividing students in schools according to racial "difference" was being challenged, dividing students according to "disability" gained greater acceptance. In comparison to public rhetoric abhorring racial segregation, exclusion based on disability is often seen as warranted (Kauffman, & Hallahan, 1995). Disability has become a more socially accepted, even normalized, category of marginalization for students of color. Examining these discourses of exclusion simultaneously highlights how deeply racialized notions of ability are entrenched in our culture—so much so that segregation of "the disabled" has also meant segregating students of color.

Thus, the histories of "race" and "disability" in the United States are long, complicated, and at times overlapping, but also distinct. Each is uniquely situated in a time and place in which a confluence of interests coalesced to attempt to forge significant social change. For example, it is possible to support the inclusion of students with disabilities, without necessarily seeing this as connected to racial integration. Similarly, one can argue for racial integration without supporting the inclusion of students with disabilities.

Furthermore, White privilege and racialized conceptions of ability have allowed some parents and educators to use certain special education categories as a tool for continued racial segregation. Children of different races have been classified into different categories, with Black and Latino stu-

dents most likely to be overrepresented in the majority of categories, and placed in more restrictive settings.

Still, there have been critical junctures at which the supporters of these two policies—special education and desegregation—seem to be very much on the same side. For instance, in the late 1980s, individuals with disabilities, along with family members, friends, and allies (including some scholars in the field of special education) mobilized in support of including more students with disabilities into regular classes. This was clearly in line with desegregation advocates' efforts to reduce within-school segregation via tracking. Yet, similar to oppositional reactions after *Brown*, resistance to inclusion has been widespread and fierce. As a result, a compromising strategy of gradualism was argued in both cases, and largely adopted in schools.

Within the U.S., rhetoric of race and disability overlap and are utilized to justify both exclusion and marginalization. Both *Brown* and IDEA are implemented in a society with a dominant ideology that racializes notions of ability and merit. The purpose of this article, then, is to examine this complex, intertwined relationship between school desegregation and the growth of, and consistently biased practices operating within, special education.

We focus on two themes that highlight the complex relationship between race and disability in school practices. First, we look at the interconnected relationship of race and ability in maintaining segregation through the overrepresentation of students of color in special education. Second, we focus on the political alignment of special education and desegregation and examine the strategy of gradualism used in resisting *both* racial integration at the school level back in the 1950s and classroom integration—in terms of race and/or disability—through the much more recent “inclusion” movement in special education.

Mirroring these two central themes, this article is organized in two major sections. The first is an overview of the intertwined histories of *Brown* and special education policy. The second is an analysis of newspaper editorial page discourse on resistance to both desegregation and “inclusion” of special education students in general education classrooms.

THE INTERTWINED HISTORIES OF SCHOOL DESEGREGATION AND SPECIAL EDUCATION

In the Supreme Court's landmark *Brown v. Board of Education* decision, Chief Justice Warren wrote that the practice of segregating students by race creates in Black students “a feeling of inferiority as to their status in the community that may affect their hearts and minds in a way very unlikely ever to be undone” (in Williams, 1987, p. 34).

Direct or indirect references to the ruling of the *Brown* decision that segregated schooling is inherently unequal are common in the history of special education in this country, including the ongoing debates about the inclusion of students with disabilities in general classrooms. For example, disability studies scholar Harlan Hahn (1997) echoes Justice Warren when he writes, "Since separation on the basis of disability is apt to leave an enduring *imprint on the hearts and minds* of disabled young people, desegregation or inclusion is a fundamental component" of sociopolitical approaches to disability (*italics added*, p. 321).

Therefore, in many ways special education legislation owes its legal precedence and thinking to Brown's strategy of placing racial segregation as counter to the equal protection guaranteed by the Fourteenth Amendment of the Constitution. Following this line of argument, litigation and legislation regarding special education apply the same principles to students with disabilities, and thus, special-education policy is seen as one of the many equity-oriented legacies of *Brown* (Losen, & Orfield, 2002).

In this respect, both school desegregation policy and special-education policy strive to overcome policies and practices of exclusion based on race and disability. But other important similarities and parallels between school desegregation and special education policy exist. For instance, both have been criticized for vague terminology. From the beginning, *Brown* was critiqued for not setting deadlines for school districts to comply with desegregation orders. In 1955 when the Supreme Court addressed the issues of implementing school desegregation in a ruling known as *Brown II*, the obtuse language of the ruling requiring education officials to proceed with "all deliberate speed" opened the door for "obstructionism, foot-dragging, and outright refusal to begin the process of school desegregation" (Irons, 2002, p. 195). What followed were a series of school district and state policies such as freedom of choice plans, pupil placement laws, school closures and vouchers for private segregation academies that were all designed to "deliberately delay court orders" (Patterson, 2001, p. 96).

Similarly, P.L. 94-142 (IDEA) includes its own highly contested terminology. For example, placement decisions for students with disabilities must be informed, on a case-by-case basis, by what constitutes the "least restrictive environment" (LRE). Although IDEA has been enormously successful in giving students with disabilities access to public education, the large number of students, particularly students of color, located in more, rather than less, restrictive placements has led some to characterize LRE as a "loophole" that contributed to two largely separate and unequal education systems: general education and special education (Linton, 1998; Lipsky, & Gartner, 1996). Thus, the historical connections between school desegregation, special education, and resegregation are longstanding and complex.

DEFINING DISABILITY IN WAYS THAT UNDERMINE DESEGREGATION AND INCLUSION

In the first half of the 20th century, coinciding with the U.S. eugenics movement, separate facilities and programs for children deemed as slow or retarded flourished (Franklin, 1987). Later, the emergence of new categories, such as slow learner, mentally retarded, emotionally disturbed, and culturally deprived, further rationalized the practice of removing certain students, especially those of non-White, immigrant and poor backgrounds, from general education (Sleeter, 1987).

Until the 1970s, many students with disabilities were denied *any* education if their school district claimed an inability to accommodate them (Fleischer, & Zames, 2001). When P.L. 94.142 was passed in 1975, there was immense hope that this law would ensure a free and appropriate education for students with disabilities at public expense. However, although many students with disabilities gained access to public schools and benefited greatly from an education, they did not necessarily access mainstream classes. Furthermore, disability labels were now given to previously unlabeled students in general education, which facilitated their removal to segregated programs. The evolution of two separate systems of education echoed the inequalities associated with racially segregated schools.

Rigid and narrow norms regarding “ability” have affected the way in which special-education policies have been implemented, contributing to the persistent overrepresentation of Black and Latino (and Native American) students in special education—a practice that has allowed schools to sort students along racial lines (Artiles, Rueda, Salazar, & Higareda, 2002; Gartner, & Lipsky, 1987). We know from the history of school desegregation that such narrow conceptions of ability were used to undermine the effects of *Brown*, once students of different racial backgrounds were put together in the same school buildings. Mickelson (2001) and others have used the term “second-generation segregation” to explain how racially diverse schools reseggregated students along race, gender, and class lines based on biased notions of ability. She found that “Black and White students with comparable academic abilities are found in different academic tracks. . . [resulting in] the pervasive resegregation” of students (pp. 216–217). Oakes and her colleagues also explore how normative assumptions about race and social class pervade school-based notions of ability. As one teacher in their study stated, “We all know that [tracking] has been a masquerade. . .for institutional racism” (Oakes, Wells, Jones, & Datnow, 1997, p. 482).

During the 1950s, as *Brown* was becoming a reality, a sharp rise in standardized testing helped to establish a set of rigid norms regarding academic ability based on White, middle-class American experiences, values and expectations (Carrier, 1986; Patterson, 2001). As an institutionalized

practice, the testing movement simultaneously identified and created groups of students who deviated from the “normal” or “average” student. The result was the seemingly beneficent provision of separate classes. According to one commentator, “As schools became more diverse, teaching became more challenging. Separating children by disability was one way to make it easier” (“All of Our Children Are ‘Gifted’,” 1995, p. 8A) Yet, because of biased notions of race and ability, “special” classes became increasingly populated by minority, immigrant, and other already marginalized students (Oakes, 1985).

Meanwhile, the process of labeling students—ostensibly to better meet their needs via specialized settings and services—steadily increased during the 1960s, when the term learning disability (LD) was coined and the term emotional disturbance (ED) gained increased usage in the field of education (Gartner, & Lipsky, 1987). According to Sleeter (1987), the use of learning disability labels grew quickly because it enabled families of White, middle-class children, who were unable to meet increased academic expectations of post-Sputnik era curriculum reform, a different and less stigmatizing way to explain their children’s difficulties and also to gain access to special services. In other words, the label allowed a new group of mostly White, middle-class children to receive educational supports without being mixed into the existing pool of special education students (Sleeter, 1987). As a result, many special-education classes became as racially segregated as general education ones.

Recent studies show how the label of disability triggers disparate outcomes for White students and students of color. For White students, special-education eligibility is more likely to guarantee access to extra support services, maintenance in general education classrooms, and accommodation for high-status examinations (Parrish, 2002). For students of color, however, being labeled as disabled can result in decreased access to general education and poorer transition outcomes (Oswald, Coutinho, & Best, 2002; Parrish, 2002; Fierros, & Conroy, 2002; Osher, Woodruff, & Sims, 2002; Artiles et al., 2002). These different outcomes are particularly problematic given the disproportionate number of Black and Latino students who are identified as disabled and placed in highly segregated settings (Losen, & Orfield, 2002).

Other studies have shown that Black males are over twice as likely as Whites to be labeled mentally retarded (MR) in 38 states, emotionally disturbed (ED) in 29 states, and learning disabled in eight states (Parrish, 2002). The labels of emotional disturbance and mental retardation continue to be overly ascribed to students of color—assigned to Black and Latino males several times more often than any other group (Osher et al., 2002). Furthermore, students of color who are given these three particular special-education labels are more likely to be removed from regular classrooms (Fierros & Conroy, 2002). In analyzing nationwide data collected by the

Office of Civil Rights, Parrish (2002) concludes that White students are generally “only placed in more restrictive self-contained classes when they need intensive services. Students of color, however, may be more likely to be placed in the restrictive settings whether they require intensive services or not” (p. 26).

Fierros and Conroy (2002) have noticed similar patterns of overrepresentation and conclude that over-labeling results in “unwanted isolation” of students of color from the mainstream (p. 40). In other words, there is a marked correlation between the type of disability label and the restrictiveness of placement. For instance, consider the U.S. Department of Education (2000) statistics about access to a general education environment for students with different special-education labels. These reveal that 82 percent of students labeled mentally retarded, 70 percent of students labeled emotionally disturbed, and 56 percent of students labeled learning disabled spent more than 21 percent of their school time outside of regular education classrooms (Fierros, & Conroy, 2002, p. 49). Moreover, the demographics of learning disabilities programs have shifted from predominantly White students to students of color, particularly students of color residing in urban areas (Fierros, & Conroy, 2002). Fierros and Conroy also conclude that students labeled learning disabled in urban settings are more likely to be placed in more restrictive environments than peers in suburban schools (p. 61). Their research, along with previous studies (Conroy, 1999; Harry, 1992) suggest that the amount of time a special-needs student is placed in his or her regular education classroom is highly correlated to his or her race.

Therefore, both special education and tracking have been used to resegregate students of color and White students within desegregated schools after the passage of *Brown* (Mickelson, 2001; Parrish, 2002). Disability labels have worked as a mechanism to further exclude historically marginalized students of color. Conversely, labels denoting exceptional ability or “giftedness” have allowed schools to protectively segregate certain classes of White students (Oakes et al., 1997). As Oakes and her colleagues (1997) contend, given the history of intelligence, it is not difficult to understand how tracking became a “systematic form of racial segregation within schools” (p. 492). Both types of labels (disabled and highly able) were used to resegregate classrooms along race and class lines. In sum, despite a widely held claim that the primary intent of special education is to serve students with disabilities, it has also served both segregationists and anti-inclusionists well. Thus, the tendency to focus on the positives of special education obscures how race and disability have been conflated, via the persistent overrepresentation of students of color, to subvert the promise of *Brown* and to deny equal access to educational opportunities.

THE INCLUSION MOVEMENT WITHIN SPECIAL EDUCATION: DRAWING ON THE LOGIC OF BROWN

Drawing on the logic set forth in *Brown*, and responding to the criticisms of overrepresentation of minority students and lack of demonstrated efficacy of special-education, advocates in the late 1980s and early 1990s began to push harder for more inclusive placements for all students with disabilities. Often proponents of inclusion used *Brown* to help explain their resistance to segregated placements for students with disabilities. Lipsky and Gartner (1996), for example, argued that, "The continuation of the current special education system—separate and unequal—violates" standards of equal opportunity and integration (p.146).

As a result of increased awareness of overrepresentation, the reauthorization of IDEA (1997) required school districts and state departments of education to determine whether problems of overrepresentation and underrepresentation existed and to develop measures to address them (Sallend, 2001, p. 19). In addition, many in the disability rights movement argued that exclusionary schooling practices reflect patterns of a society at large that continues to resist increased inclusion of people with disabilities in schools and society (Fleischer, & Zames, 2001). However, like school desegregation, the inclusion movement elicited strong opposition in the press and inclusion proponents were similarly vilified (Ferri, & Connor, in press).

Despite the simple premise that the purpose of inclusion was to ensure equal access to general education classes with appropriate accommodations and supports for students with disabilities, descriptions of inclusion in the press were frequently cynical, even hostile. For example, inclusion has been called both a "doctrine" ("Not-So-Special-District," 1994, p. 12D) and a "mantra" (Wharton, 2000, p. 17) invoking a coercive conversion to a religious calling.

Furthermore, Albert Shanker, former president of the American Federation of Teachers, claimed that inclusion was "a recipe for educational disaster" ("Special Focus," 1996, p. 6B). Shanker's view is representative of a majority of teachers who claimed that an increase of students with disabilities in their classes would make teaching impossible. Although Shanker predicted that inclusion would bring catastrophe, the experiences of students with disabilities who have been taught in segregated settings have already been described as disastrous (Brantlinger, 1997; Karagiannis, 2000). Thus, ironically, Goodman (1994) asks whether inclusion is a "real educational approach" (p. C18), but fails to ask the equally pertinent question of whether exclusion is a real educational approach.

Andrew Imparato, president of the American Association of People With Disabilities, points out that despite the more recent push for inclusion, "data from the Department of Education show that national graduation rates for students who receive special education have stagnated at 27 percent for the

last three years, compared to 75 percent for students who do not rely on special education” (2001, p. 14).

It is clear that special education, despite being designed to meet the needs of diverse groups of learners, has nonetheless been used to both create and perpetuate the marginalization of individuals based on the interconnected discourses of race and ability. In maintaining a border that “keeps out” the unwanted by labeling them deficient, these practices run counter to the very democratic ideals often attributed to the U.S. educational system (Lipsky, & Gartner, 1997; Skrtic, 1991). Meanwhile, disproportionate numbers of students of color continue to be identified for special-education services and placed in the most restrictive of placements (Artiles et al., 2002; Fierros, & Conroy, 2002; Lipsky, & Gartner, 1996; Osher et al., 2002).

We argue that the lack of progress toward more inclusion is mirrored in the lack of progress toward greater desegregation in the last two decades. We base this argument on our analysis of the resistance to each of these policies, as documented in the editorial pages of newspapers.

EXAMINING DISCOURSES OF EXCLUSION IN THE POPULAR PRESS

To explore further how the interconnected discourses of race and ability have been used to maintain and justify an educational system that is segregated by race and disability, we examined newspapers from two eras—1954–56 (during the time of the *Brown* decision) and 1987–2002 (peak years of the debate over greater “inclusion” of special education students in regular classrooms, particularly after the Reauthorization of IDEA in 1997). We collected editorials written by newspaper editors, “op-ed” pieces written by columnists or contributing writers, and letters to the editor written by readers from a range of presses.

For the purpose of this paper we focus primarily on data we collected from *The New York Times*, *The Washington Post*, and *The Atlanta Journal and Constitution*, as well as two African American presses: *The Richmond Afro-American* and *The Atlanta Daily World*. This choice represents northern and southern newspapers as well as “mainstream” and “independent” publications (not coincidentally along lines of race). Another key source of analysis during the earlier periods was the “What They Say” column (also ranging from 1954–1956) in *Southern School News*. Financed by the Ford Foundation, this monthly publication synthesized information focusing on the topic of desegregation in newspapers from around the country, providing access to a broad array of opinions across many states. This publication no longer existed by the late 1980s and thus was not included in the data on the inclusion debate from the later period.

From the 1954–56 period, data collected from these five papers includes approximately 450 pages of text, with nearly 250 coming from the Black press. During the later period, approximately 165 pages of text about inclusion were located from the mainstream press, and 35 from the Black press.

We chose to study the debates and discussions about school desegregation and inclusion as they played out in newspapers to better understand how ideas about ability/merit, which function to uphold White racial supremacy, were manifest in more popular and less scholarly or legal discursive contexts of the editorial pages of the newspaper. In many ways, newspapers, particularly editorial pages, can be seen as spaces in which the general public is engaged in an ongoing dialogue across time—a particular kind of call and response format where a response is both invited and expected.

Moreover, by collecting editorials from both “White” and “Black” presses we aimed to illicit a diverse range of opinions. Still, we acknowledge that there are many voices that are not heard in the context of newspaper editorial pages and that many who write letters to the editors or opinion pieces and never get them published. This is particularly true for a major national newspaper such as *The New York Times*. Furthermore, the vast majority of readers of these publications never even attempt to write letters or opinion pieces.

Nonetheless, we argue that by examining editorials and letters authored by the newspaper editors, readers, and columnists or contributing writers who are considered experts, across a range of newspapers with different audiences, we create a space where no single point of view dominates or holds absolute authority (see Tanaka, 1997). Thus, we focus on the editorial pages of these papers as our unit of analysis—looking at them as places where divergent opinions and voices are represented for a popular audience.

Like Foucault’s genealogical method, we attend carefully to discourse, particularly local, unofficial knowledge, in order to trace how the language of exclusion worked in everyday contexts (Rabinow, 1984). We consider racism and ableism not as isolated systems of oppression, but rather as interconnected and interdependent social forces. Our intention is to show how the rhetoric of race and the rhetoric of disability overlap and are used to justify exclusion on the basis of race.

In our analysis of school desegregation and inclusion, we draw connections, including parallels and juxtapositions, between the two discourses around the topic of change at the local level in response to two federal mandates—*Brown* and IDEA. Thus, we are examining resistance to or acceptance of change in terms of the racial make up of schools and change in terms of degree of special education inclusion in schools. We are particularly interested in the suggested pace of implementing changes.

Still, resisting the impulse to collapse one history or voice into another, we aim to forge connections across the dialogues concerning school

desegregation and those concerning inclusion without erasing differences (Tanaka, 1997). By attending to the discourses of racial segregation and exclusion of students with disabilities, we call attention to the discursive construction of student subjects deemed unworthy of integration or inclusion. Moreover, by questioning the taken-for-granted notions of the “normal,” “regular,” “general,” and “average” student, we highlight the interplay of racism and ableism and question the efficacy of gradualism as a means of reform.

In the following two sections of this article we explore both the impulse and impact of gradualism on school desegregation and inclusion of students with disabilities.

GRADUALISM AS A PLACEBO FOR CHANGE: THE CASE OF DESEGREGATION

Despite what is sometimes characterized as a sincere attempt at educational change, Hochschild (1984) argues that incremental approaches to school desegregation have proven “little. . .help [to] either minorities or whites” (p. 91). By arguing that “Half a loaf, in this case, may be worse than none at all” (p. 91), Hochschild also suggests that incremental policies may be more damaging in the long run than no policy at all because gradualism results in backlash and resegregation.

The *New York Times*, widely considered “the acknowledged newspaper of record and thus the most powerful editorial voice in the nation,” published a series of report cards at 10-year intervals following the *Brown* decision (Martin, 1998, p. 199). These editorials illustrate evolving recognition of the slow progress of desegregation and the failures of incremental change. At the 10th anniversary of *Brown*, for example, *The New York Times* editor describes *Brown* as a “great turning point in the battle for civil rights” (p. 224). In a hopeful tone the editor suggests that although the “battle is far from won. . .the commitment to equal opportunity is irrevocable, the outcome certain” (p. 224).

By the early 1980s, despite tremendous reductions in segregation levels in Southern schools, racial segregation in public education had become more complicated and more insidious. Dan Morgan (1980, July 28) in *The Washington Post*, writes, “Twenty-six years after the Supreme Court declared school segregation unconstitutional, separate education for blacks and Whites still predominates outside the South” (p. A6).

The 40th anniversary installment in the *New York Times*, titled *Forty Years and Still Struggling*, suggested a growing awareness of a more ambivalent and contested history for *Brown*. Here the *Times* editor calls the decision “an occasion both for national pride and national shame.” He faults court decisions, suburbanization, White flight, industrial

decay, and political ennui as contributing to “an unacceptable number of minority students still attending all-minority or nearly all-minority schools”(Martin, 1998, p. 228).

Similar sentiments were echoed at the 50th Anniversary of the *Brown* decision. Our own data, taken from editorial pages from the years immediately following *Brown*, show that a fear of “violent retaliation” (Patterson, 2001, p. 83) led many to advocate for an incremental approach to school desegregation as the only viable plan. Even Supreme Court Justice Stanley Reed, who went along with the majority, said that he did so only because segregation would “be dismantled gradually rather than all at once” (Williams, 1987, p. 33).

In the years immediately following *Brown* much of the space in the editorial pages was taken up by those weighing in on the merits of incremental change. Many states and local districts saw gradualism as an opportunity to delay. As Arthur Krock (1956) wrote in *The New York Times*, “When the National Association for the Advancement of Colored People says it opposes ‘gradual’ because there are communities where ‘gradual means never’ it is being wholly realistic” (p. 34). As stated earlier, the Supreme Court’s language of “all deliberate speed” in *Brown II* also drew a range of opinions. Some characterized the court as showing “profound wisdom” by not setting a definite time limit because the South wasn’t “ready for that monumental change” (“Arkansas,” 1955, p. 8). Others became impatient, reminding readers that “prompt” meant “now, immediate, during the present” (“What They Say,” 1955, p. 5).

In our reading of the editorial pages following *Brown*, the concern was often not necessarily about when to desegregate, but rather how to avoid or delay it. One of the most common themes expressed was an appeal both for time and for calm as key to solving the “problem” of desegregation. With time, many suggested, Southern Whites could adjust to the “social upheaval” involved in integration, despite the fact that few had begun work on developing implementation plans years after the original *Brown* decision. In an interview, published by *The Southern School News*, a school board member from Texas explained, “Well, they [members of the White community] are not satisfied with desegregation and are not ready to enter into it right at the present time. . . I believe if we were given sufficient time we could work the problem out but at the present time we have no plan” (“Circuit Court,” 1956, p.14).

Thus, rather than planning for compliance, it appears that, based on the editorial pages that we analyzed, most state and local officials used the period after *Brown* to strategize how to use every “legal” means available to circumvent court desegregation orders. As a result, many in the Black community saw *Brown* not as the end of Jim Crow, but rather simply

another step in the long and protracted struggle towards full citizenship ("Nation's Top Negro Educators," 1954, p. 4). Moreover, many predicted accurately that gradualism would allow "some states to get away with segregation for untold years to come" ("Charleston," 1955).

Acknowledging the seemingly endless possibilities for delaying court orders, predictions were also made about the amount of time that would be required to desegregate the schools. Unfortunately even those who predicted that desegregation would take decades underestimated the degree of resistance that integrationists would encounter or the degree to which gains could be lost over time (Orfield, 2001).

For example, a Black principal in Mississippi, predicted that "desegregation will take at least 50 years" ("Raps Supreme Court," 1956, p. 7). Another letter published in *The New York Times* read: Desegregation "may be feasible in Florida in the next fifty to 100 years. No one could say it's feasible now" ("South Reacts," 1955, p. 30).

Some letters and editorials suggested that, given enough time, Black schools could be equalized, despite the fact that the Supreme Court ruling *Plessy v. Ferguson* (1896) guaranteed equal facilities in the first place. Even some Black educational leaders acknowledged the "one good by-product of the controversy [had] been the building of some excellent schools for Negroes in the South" ("Raps Supreme Court," 1956, p. 7).

These extremely costly efforts were based not on good will or fairness, but on an assumption that if Black schools were finally equalized, Black parents would not fight for or choose integrated schools. Blacks were told to be patient and put their trust in the courts or in the states to do the "right thing." An editorial in the *Atlanta Journal and Constitution* announces the dedication of a new school building in Atlanta in such a way as to communicate to readers that the Atlanta schools are proceeding in "good faith" to equalize facilities:

Georgia's accelerated school building program...emphasizes equal facilities for Negroes. Throughout Georgia, one can see them going up—splendid new structures to replace ramshackle, frame firetraps. We have been slow in rising to the obligation of equal educational opportunities, but once having raised we are moving fast
(“Negro School Dedication,” 1954, p. 4).

Of course, many in the Black community saw through these schemes and delays. As one woman from Georgia asked, "...the doctrine of 'gradualism'...[has it] really been working as well for our Negro schools? Have we yet equalized opportunities...?" (Mitchell, 1955, p. 4). Thus gradualism was argued to be both inevitable and necessary for change while, at the same time, it was seen as a strategy for circumventing change. Gradualism also

enabled schools time to reconfigure testing and tracking policies that resulted in pervasive resegregation (Mickelson, 2001; Oakes et al., 1997). Given the current situation of school resegregation, we might argue that immediate implementation might have been the better course of action.

PROCEEDING WITH CAUTION: THE CASE OF INCLUSION

As in the case of school desegregation, the movement from segregated placements toward more inclusive ones for students with disabilities has involved a long and often difficult struggle. Although by 1975 children and youth with disabilities were ensured a free and appropriate public education by law, they were not guaranteed a placement in a general education classroom. As we noted above, increasingly, as parents and advocates of students with disabilities became more dissatisfied with segregated schools and then segregated classes within public schools, they began to argue that the least restrictive environment clause in what we now know as IDEA should be understood to mean that students with disabilities should be educated in the general education classroom. As with the vague terminology in *Brown II* requiring schools to proceed with “all deliberate speed,” IDEA’s mandate for the “least restrictive environment” invited a range of interpretations and much space in the press (and in the courts) was taken up with debates about the interpretation of language in both decisions.

Despite the lack of progress made by students with disabilities in segregated placements, critics of inclusion were also quick to cite a lack of research on the efficacy of inclusive placements. Many also cautioned against rushing into widespread implementation of inclusion and argued for a more gradual approach. This stance, of course, ignored the fact that 20 years had elapsed between the passage of PL 94-142 (now IDEA) in 1975 and any serious push for full inclusion of students with disabilities. Thus, although civil rights had been encoded within the law, the same legal system allowed detractors to contest and delay integration in both instances.

Advocates linked inclusion to the larger civil rights movement and argued that including students with disabilities in general classes was long overdue, despite the lack of awareness of inclusion as a disability rights issue. According to Head, Head, Hall, & Hall (1996):

More than 30 years ago, the civil rights movement ushered our nation into a more enlightened era. Thanks to those who struggled for justice then, few people question the moral imperative of integration—that is, except, when it comes to children with disabilities (p. C8).

Professional and parent advocates both stressed the moral, ethical, and philosophical basis of inclusion. Among the important advocates for

inclusion were parents who argued that their children were not progressing adequately in segregated special-education placements. As one parent of a disabled child writes in a letter to the editor of the *The Washington Post*, "I am the parent of a son who has Autism. . . . Given that segregated alternatives have failed to achieve decent quality of life for people with disabilities. . . [inclusion] is justified and worth our best efforts" Ruppmann, 1991, p. A16).

Yet even when school systems have shifted to more inclusive practices because of legal requirements, the results were often characterized as cosmetic or "shallow" (Nealon, 1991, p. 1). Such disenchantment with special education and the lack of inclusive placements has grown in recent years as many school districts demonstrate continued apathy toward including students with disabilities in general education classrooms. Moreover, decisions about inclusion, which continue to be made on a case-by-case basis, demonstrate a lack of commitment to inclusion and reveal the assumption that segregated placements are preferable for students with disabilities. As one judge determined, a "teenager [with a disability] would be isolated socially and academically" in a general education class ("Transfer of Disabled," 1988, p. 6). The judge concluded that a segregated school was the least restrictive environment for this student.

Like those within the Black community who argued against desegregation, some parents of students with disabilities sought to block inclusion, perceiving it as a loss of hard-won rights and services or as an erosion of power or access. For example, a group of parent advocates sued on behalf of severely handicapped students by arguing that inclusion would reduce services for children (Belluck, 1996).

Despite widespread opposition to inclusion, finally in the 1990s, around the time of the passage of IDEA, the debate began to shift from "Should we include students with disabilities?" to "If we have to do it, what is the best way?" At this point, as with *Brown*, voices advocating gradualism came to permeate much of the discourse. As Paul Alberto, a special-education professor at Georgia State University, writes in the *Atlanta Journal and Constitution*: "While social and communication skills improve for these students, more work is needed to determine if self-help and job skills can still be taught in an inclusive setting" (Jacobson, 1994, p. C1). Alberto conveys an optimistic stance, yet his message is clear: proceed with caution. Many editorials, op-eds, and letters all warned of the dangers of inclusion for disabled and non-disabled students. For example, in a fairly representative letter to the editor, one educator writes, "If we mainstream all students with special needs into the system now, everyone will lose" (Young-Hawthorne, 1990 p. B6).

Implementing inclusion effectively requires schools to make adjustments in order to fully accommodate students with disabilities. Unfortunately, many schools failed to make these changes. Teachers reported lack of training and large class sizes, while parents critiqued the lack of individualized

instruction provided to their children. The resistance to inclusion made even some proponents cautious. As one teacher commented,

People who advocate. . . [for full inclusion] should listen to teachers in mainstream schools, where there is uncertainty, lack of confidence, concern, and, sometimes, I'm sad to say, indifference to the needs of our pupils. I don't disagree with the mainstream provision, but it's a considerably long way off. . . (Revell, 2001, p. 6).

Some predicted a loss of money, diminished services for students with disabilities, and an inevitable slide into chaos. A *New York Times* op-ed claimed, "... the state would attempt to wring savings from the program by putting disabled students back into regular classroom settings without providing the services those students needed" (Hernandez, 1999, p. 1).

Critics of inclusion often stressed the vast differences between the needs of students with disabilities and their non-disabled peers. In a letter to the editor, the executive director of The New York Institute of Special Education wrote that students at his facility were now achieving "great success in passing statewide tests—because the specialization they needed could not be achieved in their public school setting" (McMahon, 2002, p. 24).

Similarly, a mother of a student with a disability asserted, "It is beyond dispute that disabled children require more time with the teacher than non-disabled children, often with a heavy emphasis on behavior modification" (Kastens, 1995, p. A15).

Thus, many of those voicing opposition to inclusion stressed that students with disabilities had very different needs than general education students (Strausberg, 1992). In other words, it is clear in these texts that students with disabilities are perceived as so radically different from non-disabled children that their needs either could not or would not be addressed in general education classes.

READING RESISTANCE: UNDERSTANDING DISCOURSES OF EXCLUSION

In this article we sought to examine desegregation and inclusion in the space of the newspaper, where we can clearly see how different groups negotiated inequality and sought to change it or maintain it. In these connected histories, individuals deemed undesirable were kept out of the schools and classes of those with more power. As noted, technologies of power manifest themselves in many forms, including excessive and biased testing, educational norms determined by the dominant group, and stigmatizing labels, all contributing to the resegregation of classrooms along the

same axes of power. Taken together and accepted without question, these technologies of difference construct and fortify existing rationales behind exclusive practices and continue to create new forms of containment to maintain traditional divisions among students.

Many unarticulated assumptions undergird thinking about desegregation and inclusion. Implicit in the discourse of exclusion are perceptions of Black and disabled people as unequivocally inferior. Such widespread deficit-model perceptions are deeply entrenched in the cultural imagination and are evident in oppressive legislation, educational practice, as well as in the distorted portrayals of “others” in academic scholarship, literature, media, and film (Adams, 2001; Bell, 1992; Fleischer, & Zames, 2001; Gould, 1996; Thomson, 1997). Recently, however, concepts of “race” and “disability” have become challenged by scholars within the fields of Critical Race Theory and Disability Studies as long-standing socio-cultural constructs. Lawrence (1993) writes

...race is a social construction. The meaning of ‘Black’ or ‘White’ is derived through a history of acted-upon ideology...the cultural meaning of race is promulgated through millions of ongoing contemporaneous speech acts... segregation and White supremacy ...constitutes and maintains a culture in which non-Whites are excluded from full citizenship (p. 62).

A similar argument is made by disability studies scholars who critique the fiction of normalcy and disability, and instead characterize these concepts as mutually dependent social (rather than biological) constructions (Davis, 1995; Linton, 1998; Oliver, 1996). The exclusion of both groups from full citizenship can, therefore, be seen as a form of containment.

How might the notion of containment be linked to the idea of change? If, generally speaking, educational change is perceived by the dominant group as a form of loss (Guskey, & Huberman, 1995) what are people who advocate maintaining exclusive practices fearful of losing? West (1993) argues that “...White America has been historically weak-willed in ensuring racial justice and has continued to resist fully accepting the humanity of blacks” (p. 3).

As Bell (1995) confers, “...few are willing to recognize that racial segregation is much more than a series of quaint customs that can be remedied effectively without altering the status of Whites” (p. 22).

These statements convey that Whites’ fears and Blacks’ hopes are diametrically opposed: each group perceives the potential changes integration may bring very differently. If Black people are seen as equal to Whites, then White people lose their historical positioning, replete with unexamined privileges, and in doing so, their sense of superiority. Similarly, if disability is

“a social state rather than a biological difference” (Barnes, Mercer, & Shakespeare, 1999, p. 37) then ability and normalcy must also be socially constructed, rather than innate. Therefore, blocking the access of Black people and people with disabilities to all levels of society rests on a central, but often unarticulated, assumption of superiority by the dominant group. This very superiority is threatened by integration, which historically has evoked many fears, including an increased competition for jobs, miscegenation, and “pollution” of the nation’s gene pool. Thus, access appears to literally diminish White and able-bodied presence, and therefore, power.

Schools uphold and reinforce the dominant beliefs of society. As such, they are examples of racism and ableism in practice, although they are rarely portrayed in this way. The power manifested within them is masked by purported neutrality. Foucault underscored how technologies of power are accepted “only as a condition that it masks a substantial part of itself. Its success is proportional to its ability to hide its own mechanisms” (1990, p. 86). The “undesirability” of Black children and/or children with disabilities in schools is indicative of the values of our larger society, which seeks to deny access by containing individuals in markedly asymmetrical positions of power. However, this legacy is coming under increased scrutiny, reflected in recent research sponsored by the Civil Rights Project at Harvard University (see Losen, & Orfield, 2002).

Of course, technologies of exclusion, including ability testing, tracking, labeling, and special education, have played a major part in the resegregation of our schools. By engaging critically with how desegregation and inclusion were framed in these different but connected histories, we gain a deeper understanding about the resistance to integrated schooling for all students and about the unchanging nature of public education. Moreover, we have come to see how linear, evolutionary notions of progress enable people to avoid, delay, and refuse change more than they encourage its gradual acceptance.

From our current vantage point, 50 years since *Brown* and nearly 30 years since P.L. 94.142 (IDEA), perhaps the lesson is to be alert to individual and institutional reactions to change. Looking at these histories simultaneously shows how easily racism and ableism function as twin tools of exclusion and how inclusion and desegregation are intimately connected. As powerful laws are established, which threaten the status quo, those whose own power has been displaced seek to regain their former status. In contrast, those once overtly marginalized continue to find their access inhibited in new ways. In other words, the status quo is maintained, although it may emerge in different ways, as in the case of overrepresentation of students of color in special education or academic tracking. Under the guise of gradualism, unquestioned discourses of exclusion are allowed to thrive or transmogrify. This leads us to conclude that until the population becomes

committed to sharing power on a more equal basis, true diversity within our democracy can only remain an ideal out of reach.

Notes

1 Ableism is a widely used term in disability studies to refer to discrimination and social marginalization resulting from mainstream or majority notions of “ability” that are pervasively projected (in blatant and subtle ways) upon those deemed “disabled.” Like racism, ageism, sexism, etc., the term calls attention to the taken for granted ways that one side of a binary exerts power over the other, controlling interactions and representations in ways that the dominant is elevated at the expense of the marginal. As an interdisciplinary academic field, disability studies seeks to challenge dominant ideologies and assumptions of ability and disability.

2 We prefer to use the terms Black and White in this article for purposes of parallelism. We have refrained from using African American as the term does not incorporate people of Caribbean descent or African immigrants.

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