Urban Rev
DOI 10.1007/s11256-014-0293-6

Whiteness as Property: Innocence and Ability in Teacher Education

Subini Ancy Annamma

Abstract In this article, I empirically examined the dispositions of teachers in juvenile justice surrounding young women of color with disabilities to inform what improvements can be made in teacher education. I utilized Critical Race Theory (CRT) and focused on the tenet of whiteness as property as a lens to provide a robust racial analysis of the dispositions of teachers. Findings indicated that instead of a status that elicited support, ability became another thing to surveil, perpetuating a commitment to whiteness as property. An implication that arose directly from these findings was that teachers need training in understanding theories of race, racism, and inequities that recognize the historical legacy of whiteness as property. This training could lead to a change in teacher dispositions and practices that may disrupt the School to Prison Pipeline.

Keywords School to Prison Pipeline · Critical Race Theory · Disability Critical Race Theory

The School to Prison Pipeline, or the Pipeline, has historically steered children out of school and into prisons (Advancement Project 2010). Through methods such as ticketing students for minor offenses, implementing disciplinary removal, and "securing the environment" through means such as metal detectors and fencing, schools funneled children of color into prisons (ACLU 2008; Kim et al. 2010). This criminalization of children of color illustrated what Fredrick Douglas (1883) called the American habit to ''impute crime to color''.

Pipeline literature made explicit connections between race, criminalization, and education (Bahena et al. 2012). However, other social identity markers and their intersections with race marked children as more susceptible to the Pipeline.

S. A. Annamma (&)
Interdisciplinary Research Incubator for the Study of (In)Equality (IRISE), University of Denver, 2000 E. Asbury Avenue, Denver, CO 80208, USA
e-mail: subiniannamma@gmail.com

Published online: 10 July 2014

Disability has a distinct role in the Pipeline (Wald and Losen 2003). An average of 33–40 % of students in juvenile incarceration have been identified with a disability (Houchins and Shippen 2012; Quinn et al. 2005). In contrast, 12–14 % of students in public schools are labeled with disabilities[1] (National Education Association 2007; Young et al. 2010). Therefore, special education assignment must be considered a contributing factor to the Pipeline (Meiners 2007).

Intersectional analysis, one that recognized oppressions are mutually constituted, illuminated how race, gender, and disability position particular bodies in the Pipeline. This is in contrast to uni-dimensional analysis (i.e., examining *only* race or *only* gender), which ignored ways multi-dimensional identities make some populations more vulnerable to the Pipeline. Though girls overall were underrepresented in the Pipeline, young women of color were overrepresented when compared to their white female peers in disciplinary actions, special education assignment, arrests, and incarceration (Losen and Skiba 2010; National Council on Crime and Delinquency 2008; Oswald et al. 2002). Pipeline literature established that disproportionate representation exists; however, statistics told little about processes that contributed to this phenomenon (Ferguson 2000). "Although men constitute the vast majority of prisoners in the world, important aspects of the operation of state punishment are missed if it is assumed that women are marginal and thus undeserving of attention" (Davis 2003, p. 65). The focus on inequities that boys of color and white females face has detracted from the fact that we have a dearth of information about how young women of color, especially those labeled with disabilities, are educated in the Pipeline (Brown 2009; Winn 2011).

Teacher Education, Race, Ability, and the Pipeline

Since 2000, teacher education—in both general and special education—continued to suffer from a lack of theoretical grounding and needed a more substantive examination of race (Cochran-Smith and Zeichner 2005; Fasching-Varner and Mitchell 2013; Gay 2002; Johnston-Parsons 2007). Educators continued to be educated in ways that ignore systemic racial inequities and their own role in perpetuating those inequities (Ladson-Billings 2005). A-theoretical approaches to issues of race in teacher education positioned the field to subscribe to unspoken norms of whiteness (Ladson-Billings 1998). Furthermore, concepts of disability were largely under-theorized in teacher education (Brantlinger 1997). A focus on the medical model of disability in teacher education ignored the very subjective and racialized nature of special education assignment (Connor et al. 2008; Ware 2001). This absence of explicit theory and subscription to unspoken norms drove pedagogical practices that rooted in teacher dispositions, instead of data driven decision-making (Harry et al. 2002). When unexamined teacher dispositions often

[1] Due to overrepresentation of students from non-dominant communities in high-incidence disability categories, also known as judgment categories, in special education, I say ''have been identified'' or ''labeled with a disability'' since being identified does not guarantee the student actually has a disability. As Harry and Klingner (2006) note, ''many *have* questioned the accuracy of the professional judgments made in diagnosing'' these disabilities.

relied on deficit-oriented myths about students, perpetuating the Pipeline (Hollins and Torres Guzman 2005). Therefore, examining the meaning making and dispositions of teachers provided a substantive view of what can be improved in teacher education (Villegas 2007). Furthermore, high quality teacher education programs have been put forth as one way to disrupt the Pipeline (Darling-Hammond 2006).

In this article, I empirically examined the dispositions of teachers in juvenile justice surrounding young women of color with disabilities. Dispositions refer to the "tendencies for individuals to act in a particular manner under particular circumstances, based on their beliefs'' (Villegas 2007, p. 373). Critical Race Theory (CRT) and its branch, Disability Critical Race Theory (DisCrit), framed the study and the tenet of whiteness as property was a lens to provide a robust racial analysis of the dispositions of teachers. CRT in teacher education can be used to "theorize and examine the ways in which race and racism impact on the structures, processes and discourses within a teacher education context" (Solórzano and Yosso 2001a, p. 3). Furthermore, CRT and DisCrit examined the intersections of race with other subordinated statuses, recognizing that oppression does not occur in isolation (Crenshaw 1993). This qualitative study described the meaning making and dispositions of teachers in juvenile justice working with girls of color with disabilities by exploring: What are the dispositions of teachers in juvenile justice regarding the education of young women of color with disabilities?

Conceptual Framework

The conceptual framework that linked the theoretical framing, literature review, research questions, methods, and analysis is a CRT framing (Ravitch and Riggan 2012). Below I summarized the evolution of CRT and its branch, DisCrit. I then shared the affordances of this framing. Finally, I explored the concept of whiteness as property that provides the main tenet used in the analysis.

Critical Race Theory

Anna Julia Cooper, Carter G. Woodson, and W.E.B. DuBois laid the groundwork for CRT: learning from those who had been historically oppressed, centering race, and analyzing inequities with an intersectional lens (Lynn 1999; Rabaka 2007; Solórzano and Yosso 2001b). Following the path of their intellectual ancestors, scholars in the law founded CRT when the Critical Legal Studies movement was critiquing the legal system based on class, but simultaneously ignoring racialized aspects of the law (Crenshaw et al. 1995). Bell (1980) questioned strategies of integration and converging interests as incomplete liberal solutions to racial inequities while Matsuda (1987) fought to center voices of non-dominant communities. Other CRT legal scholars such as Harris, Gotanda, and Crenshaw pushed o include race analyses of legal inequities. Later, scholars in education took up CRT to challenge the racialization of schooling (Ladson-Billings and Tate 1995).

Eventually, CRT scholars examined the multiple ways whiteness and white supremacy impact society (Gillborn 2005; Leonardo 2004).

Harris (1990) called for the "abandonment of the quest for the unitary self" (p. 610). This abandonment was a central tenet of feminist and postcolonial scholars across disciplines grounded in critical and poststructuralist theories and applied in legal studies. For example, feminists of color theorized that feminist writings often privileged white women's experiences (Johnson 1998; Minh-Ha 1989; Mohanty 1988). Crenshaw (1993) built on these foundations and developed the tenet of intersectionality; identity is made up of many salient parts, and the intersections of those parts must be viewed in their totality. Additionally, belonging to more than one subordinate group located an individual at the intersection of conflicting agendas and singular dimension approaches to oppression missed the ways oppressions interact. Scholars from across disciplines responded to this call by expanding CRT to encompass how racialized experiences were complicated by gender (FemCrit), immigration status, and language (LatCrit) (Wing 2003; Solórzano and Bernal 2001). Several other branches have developed stretching the boundaries of Critical Race Theory further (Aoki 1997; Brayboy 2006). DisCrit further pushed these boundaries.

DisCrit

DisCrit grew from the need to address the mutually constitutive nature of race and ability (Annamma et al. 2013b). Drawing from Disability Studies, it renounced the systems of education that often view individuals without context; that is, failure to achieve academically or behaviorally was often constructed as the responsibility of the student alone (Artiles 1998; Collins 2003; Gutiérrez and Stone 1997). Furthermore, DisCrit rejected the medical model of disability wherein the focus of education was about searching for, diagnosing, and remediating learners who are different without considering culture, and history (Annamma et al. 2013a). However, Disability Studies often employed whiteness as a tool to ignore or superficially address ways that perceptions of race and ability were intertwined (Bell 2006; Blanchett et al. 2009; Connor 2008). Building on CRT, DisCrit recognized the way most special education and juvenile justice literature is often a-historical and a-theoretical, relying on deficit views of children of color, which contributed to their disproportionate representation in the Pipeline (Asch 2001; Lynn 2004; Patton 1998). However, CRT traditionally did not substantially address issues of perceptions of ability and special education (Erevelles and Minear 2010; Ferri 2010). DisCrit bridged these chasms by exploring the socially constructed, interdependent nature of both race and ability, and how perceptions of both are based on unmarked norms of white and able bodied (Annamma et al. 2013b).

There is a vast overrepresentation of children of color in the disability categories of learning disabilities (LD), intellectual disabilities (ID, formerly known as Mental Retardation), and emotional disabilities (ED) (Donovan and Cross 2002). These are considered high incidence disabilities because the majority of children in special education are given these labels (Losen and Orfield 2002). These designations also rely on the judgment of school personnel, many who do not share the racial, ethnic,

and cultural background of their students (Artiles et al. 2010). Importantly, this pattern of overrepresentation does not occur in medically defined disability categories[2] (e.g., blind, deaf) (Harry and Klingner 2006). Therefore concern is significant when children of color are overrepresented in disability categories that rely on the judgment of adults, who may conflate differences with internal deficits (Arzubiaga et al. 2008).

This conceptual framework of CRT and DisCrit provided several affordances. By beginning with the supposition that racism, sexism, and ableism are normal practices, this conceptual framework exposed how ''neutral'' policies and pedagogy reinforced normative standards of white, male, and able-bodied (Delgado and Stefancic 2001; Goodwin 2003). These ordinary processes of racism, sexism, and ableism led to seeing differences from the unmarked norm as biological deficits (Ferri and Connor 2009; Watts and Erevelles 2004). Social constructions of race, gender, and ability are ignored and those that differ from the norm are pathologized and segregated because of their perceived deficiencies (Annamma et al. 2013a). Schools are the ultimate sorting mechanism and the Pipeline is an effective way to criminalize and segregate children starting from a young age (Bahena et al. 2012). This conceptual framework troubled singular notions of identity. Intersectionality as a analytical tool is important but can also be used to de-center race and limit the focus on whiteness (Delgado 2010). An intersectional analysis that utilizes whiteness as property centers race while recognizing that these intersections do impact the way people experience oppression. Finally, this framework demanded a focus on counter-narratives contrasted by the master narrative (Matsuda 1987; Solórzano and Bernal 2001).

The master narrative of overrepresentation of children of color in high incidence special education categories gives a simple explanation-poverty. The argument denies the salience of race and argues that children of color are more often born in poverty, and that causes more health problems leading to higher diagnoses of special education status (Parrish 2002). However if poverty were the cause of disproportionate representation, it would follow that that trend would be not only in the high incidence disability categories but also the low incidence categories as well (Oswald et al. 2002). Instead, DisCrit recognized the racialized outcomes of these seemingly race-neutral policies and practices and searches for other explanations.

Whiteness as Property

Harris (1993) theorized that whiteness is property protected by US law because property referred to not only physical objects but, anything to which a person attached value. Historically, whiteness was legitimized as property when being white was equated with permission to pursue genocide over and violent conquest of indigenous peoples of what are currently US and Mexico, who had no access to legal relief when faced with the theft of land or murder of kin (Ladson-Billings and Tate 1995). Whiteness became further ensconced as property when it defined the

[2] I recognize that subjective judgments are involved in medically defined disability categories, as well. However, due to page limits, I focus my argument here to the ''high incidence'' special education labels.

legal status of a person as free, while blackness defined slavery (Harris 1993). Over time, property has been socially constructed to encompass a host of abstract concepts associated with labor including time, creativity, and benefits of education (Harris 1993). Whiteness became a racialized system supported by ideology of property and conferring material benefits to those holders of property (Haney-Lopez 1996).

In public education, whiteness as property has become a signifier of who reaped the benefits of education through the value of property owned. Subsequently, communities with more valuable property funded schools at higher rates affording more resources, provided access to intellectual property in the form of high quality curriculum delivering more academic benefits, and wielded power over public education impacting policy and law (Buras 2011; Ladson-Billings and Tate 1995). One of the greatest assets of whiteness as property was the ability to exclude others from the benefits of whiteness, maintaining inequitable distribution of resources (Donnor 2013). Whites simply do not have to, consider equitable distribution of property and the privileges associated with that property (Bell 1980). Whiteness as property has historically and continues to function as a tool to confer social benefits, from the intangible to the material, on those who possess it and to punish those who do not.

DuBois (1897) recognized that innocence was an intangible benefit of whiteness, "Students must not forget this double standard of justice"-"one for whites (especially wealthy whites), and one for blacks and other nonwhites (without regard to rank or social class)" (as cited in Rabaka 2010, p. 299). Building on Douglas and DuBois, CRT scholars argued that the legal system has never been race neutral (Bell 1980; Crenshaw et al. 1995). Moreover, the racial criminalization of children of color, when children are simultaneously raced and criminalized, in the Pipeline reinforced innocence as an intangible benefit of whiteness as property, even for youth (Vaught 2012). Innocence as an intangible benefit of whiteness as property is further magnified when considering the intersections of gender and race. Considered promiscuous by nature, rape was not historically prosecuted because young females of color have no access to femininity or innocence (Harris 1990). Young women of color were often viewed as aggressive, unnaturally strong, in direct contrast to white femininity (Collins 1990; Jones 2009). It is clear that whiteness as property provided the protection of the intangible benefit of innocence. Those that are without the protection of innocence are subject suspicion, surveillance, and incarceration.

Methodological Pluralism

This research was part of a larger empirical study in which I collaborated with ten young women of color labeled with emotional disabilities in order to map their trajectories through the Pipeline. This qualitative investigation allowed me to bring to bear different theories and methods to research the issue of the Pipeline intersectionally. I utilized methodological pluralism, ''to document how change and discontinuity, braided with a desire for narrative coherence and consistency, shape the stories young people tell about themselves, over time and space'' in the Pipeline

(Katsiaficas et al. 2011, p. 120). To access the rich trajectories of the girls, methodological pluralism in the larger study combined collecting and analyzing textual (interviews) and visual (identity mapping) narratives (Katsiaficas et al. 2011).

Critical Phenomenology as Strategy of Inquiry

Critical phenomenology is one that required focus on both the structural inequities that position people differently and the impact of this positioning (Willen 2007). The fundamental generator of meaning is the act of experiencing the world and others through our bodies and positioning (Merleau-Ponty 1962). I was and am interested in the ways bodies are raced, gendered, and abled intersectionally; therefore this study was racially gendered, and abled phenomenological work.

The Sites and Participants

The two sites in this study, MLK and Hull, were residential facilities in a Western state in the US (details are purposefully vague, and all names are pseudonyms, to protect the participants of the larger study, a doubly sensitive population). MLK was an open door community placement. Hull was a maximum-security facility, one that has as locked doors, guards, and correctional fencing. Though the sites varied, all children at both sites were adjudicated, meaning they could not leave until either their mandatory sentence is served or they received probation or parole.

Participants in this smaller study included 16 teachers, who were interviewed, observed, or both. Teachers possessed licenses that varied from emergency teaching license to professional, and have certifi ons in content areas or special education (except those on emergency teaching). Fourteen of the teachers were white and two were African American; teaching experience ranged from 1 year to more than 20. Teachers were chosen if they taught the focal students in the larger study and if they consented.

Data Collection

I conducted interviews with school and security staff (19) and students (34), classroom observations (105), document analysis (40), and participant data analysis after an extensive IRB process. For this smaller study, I focused on the teacher interviews and observations to get a better understanding of teacher dispositions and meaning making surrounding young women of color with disabilities.

In-Depth Phenomenological Interviewing

In-depth phenomenological interviewing was used to re-construct and bring meaning to bear on participants' lived experiences (Seidman 2006). Teachers were interviewed whenever possible but availability varied. Teachers at small schools

like MLK and Hull were often asked to cover other classes for colleagues, and supervise students during planning periods or lunch. Therefore, I conducted one-three interviews per teacher. Using a thematic interview guide, interviews focused on teaching history, philosophy, practices and goals for participants, which allowed me to situate instructional and disciplinary practices within larger social and institutional contexts. This interview guide was not a set protocol, but a guide with topics to address the phenomena under study (Seidman 2006).

Ethnographic Observations

105 observations were recorded through field notes and audio or video. Numbers of observations varied due to similar reasons as stated in above section. During observations, I documented materials, patterns of participation, and classroom discourse. Observing provided me an opportunity to contextualize what I heard in interviews and what I experienced in the larger school environment.

Data Analysis

Analysis is the process of finding qualitative data and codes in the corpus of information, which the researcher must mine deeply (Erickson 1996). Below are the steps I took throughout data collection and analysis.

Iterative Data Analysis

Interviews and observations were recorded and then transcribed. I had commitments to completing coding cycles from emic and etic perspectives. The etic coding cycle included examination of analytical constructs such as incarceration discourse (Meiners 2007; Winn 2011), hypersurveillance (Rios 2011), and re-mediation (Gutiérrez and Stone 1997). The emic coding cycle emphasized pattern coding, and included, sorting out the Pipeline including different steps identified by the girls and teachers, the factors that impacted interaction, and the mediational tools available to staff and students to make sense of incarceration. I looked for patterns and disconfirming evidence. These patterns generated conceptual categories, a code thesaurus, and frequency counts (Erickson 1998).

I used Dedoose, a qualitative research program, to build and refine codes by continually returning to the data, and used a final set of codes to systematically explore the data for typicality and atypicality (Glaser and Straus 1967). The ongoing and iterative nature of qualitative research required me to consistently collect and analyze data, consider a range of possibilities, collect more data, and discuss the data with participants.

Findings

Results from this study shed light on the dispositions and meaning making teachers do in order to understand their students in the context of incarceration.

Findings are broken down by disability, gender, and race. This is not to imply that identities are uni-dimensional and should be stacked on top of one another. Instead, this organization intends to identify issues where teacher education can grow in helping teachers understand differences among students. An intersectional analysis follows.

Disability in Juvenile Justice

Teachers who worked in juvenile justice settings had mixed feelings regarding meeting the needs of girls of color with disabilities. One challenge for some teachers was minimal experience and training in special education. Mr. Enders described this lack of training.

SAA: Do you have training in (supporting students with disabilities)?
Mr. Enders: Just in the (alternative licensure program)
SAA: Did they touch on it?
Mr. Enders: Yeah. A little bit. Most of my (emotional disability) training comes from meetings at the school
SAA: Can you expand on that?
Mr. Enders: Weekly meetings with (special education director) where we just discuss what we are doing, what the purpose is, what we are trying to teach in there. That and from asking other teachers what works. I didn't have much formal training in my program. So I just have to learn as I go through trial and error. And sometimes MLK gives us more training, though it's usually around mental health issues. It's something I struggle with

This lack of training to support children with disabilities that Mr. Enders reports was common among teacher participants. When I inquired how many felt properly prepared to support students in special education, only two felt prepared. Other teachers described more substantial preparation to support students with disabilities.

Mrs. Rastin: I am a certified special education teacher. And I taught for about five years before coming to MLK as a special education teacher in the (Western City) public schools. So I have an understanding of how to support students' learning and emotional needs, especially the ones with disabilities. I try to provide that knowledge to our newer teachers and those with less education

Mrs. Rastin was an outlier; she believed she had adequate special education training to support students with disabilities. Of the teachers interviewed regarding their formal training, three had one special education class or fewer, and five had two classes, respectively. Some teachers felt the lack of special education training was problematic, while others like Ms. Roberts did not.

SAA: Do you have direct training in working with kids with disabilities?

Ms. Roberts: I don't know if I have anything special as far as this particular group. I mean…for part of my degree, I did have to do some special ed stuff; I just don't have an endorsement in it. So I definitely took classes in special ed and all that, it was required for my degree. So I have that part of it but I don't know if people get training on how to work with particular populations…I don't know…I don't know if it's really that different…The instruction is instruction and no matter who you're teaching towards, you always have to adjust. It's one of those things, reflection is part of teaching. And reflection's part of life…anything you do, you're going to look at it and go, 'how well did I do that?'

Ms. Roberts' attitude overgeneralized what good teaching means (Ladson-Billings 1995). Ms. Hand felt that support for girls with emotional disabilities looked similar to support for all students in juvenile justice,

> I think that every time a kid starts to act out and we de-escalate them, we're helping them deal with (a)…disability…And I guess, there again there is some misunderstanding about what it means to work with special ed kids and what that label means. And what services are provided as a result of that…de-escalation techniques, the time outs, all of that is part of dealing with their emotional disability.

Ms. Hand's views were similar to Ms. Roberts; the children's needs were less about disabilities and more about what many of the girls in Hull need, de-escalation and support.

At Hull, content teachers had some training in special education, but most special education services were delivered via the special education teacher, Ms. Bryson. Ms. Bryson described the multiple duties she had,

> When I got here, in October, it took us probably 2 months to catch up on all the IEPs, the transfers, the…overdue things. At first I wasn't even in the classroom…until that…got taken care of, after I took care of all the paper work and stuff…And I subbed in health for probably a month…so I wasn't giving them the service…they needed.

Ms. Bryson illustrated some of the difficulties working in settings where substitutes, especially long term ones, were hard to find. This meant that students with disabilities, who had limited access to services partially due to Ms. Bryson's part time work hours, were further restricted from content due to the ways her time was used. Ms. Bryson stated,

> They don't like it when I pull kids out here, because they think since I'm part time, my time is better in the whole class so that I can…write that I saw them. That I was in the classroom with them rather than 30 min by themselves…they don't feel that's a good use of my time.

Because of the way her time was reported, Ms. Bryson was able to sign off on IEPs even though her services were not always individualized. Additionally, Ms.

Bryson believed that children with emotional disabilities received services outside of the classroom.

SAA: How are their emotional disabilities accommodated in class?
Ms. Bryson: Well, just my being there, just as support…their emotional, they do see the therapist every day or whatever. So as far as my service goes as far as emotional support, it's pretty much just being in the classroom with them and if they have questions. And helping them, to stay calm

Ms. Bryson felt that because students saw a therapist daily, she has less to do to support them. However, students, teachers, and therapists reported opportunities to see therapists occur much less than once per day, often less than once per week. Confusion about who provided particular services made access to those services difficult according to observations and student interviews.

I witnessed Ms. Cradler and Ms. Bryson disagreeing over the legitimacy of special education services. Ms. Cradler discussed her concerns.

> Of course these kids need extra help and I will give it to them but they are also manipulative and will do anything to get out of work. So they run to (Ms. Bryson) and she coddles them. And you know what, there's no special education in real life. You aren't getting any accommodations or modifications. You just have to try harder.

Ms. Cradler expressed a view of girls of color with disabilities as lazy and manipulative. Later, Ms. Bryson shared her view.

This morning, I took [a student] and read this thing with her because she didn't understand any of it…But it was…frustrating for her because she couldn't read the words…looking at the paper, I couldn't read it either because (the copy) was so dark. She just said, I can't do this; I'm not going to read. She couldn't read the words, she couldn't see it. So then she got frustrated…Well then I go and talk to the teacher about it and they feel like she's manipulating.

Ms. Bryson captured another common tension in special education in juvenile justice: the monitoring and surveillance of the girls for manipulative behavior meant that their needs were not always being met. Ms. Cradler articulated this tension of needing to monitor children and still meet their needs.

Ms. Cradler: These girls are very criminal…Don't ever forget that
SAA: When you say they're very criminal, why do you say that?
Ms. Cradler: Why do I say that their behavior is very criminal? I mean they're looking for exciting ways. I mean it's not always about the relationship or the person; it's about the excitement that they feel doing something wrong…When I say it's criminal, it's all about how to get around the system to get what they want. And that feeds right back into their criminal mentality. Not that kids aren't master manipulators. I was a teenager. I manipulated my parents, that's our job as teenagers, you know? The difference being when you get to the power and control piece, that's where it's a little different than what it is on the outs

Ms. Cradler illustrated the complex negotiations some teachers go through in order to understand children in the context of incarceration.

One of the teachers at MLK shared a similar sentiment when discussing a student. ‘‘Ashley is really criminal minded…she wants to take the easy way out…she wants someone to take care of her but won’t ask.’’ These juvenile justice educators’ views were typical of all of the teachers I was able to formally interview. All mentioned the girls’ label as criminals and how that impacted the girls’ thinking and actions. This teacher subscription to the identity of the girls as criminal impacted how teachers treated the girls.

Teachers viewed their attempts to build relationships with their students as part of supporting their emotional disabilities. Ms. Cradler described this approach,

I think as long as you’re building relationships with your kids…and it’s important to get out there and eat lunch with your kids…let them know that you want to spend some time with them…Cuz I spend a lot of time with my IEP kids…and then keeping your word, if you tell a kid you’re going to meet with them, meet with them. Even if it’s only for five minutes to say hey I didn’t have enough time today but I didn’t forget.

Ms. Cradler repeatedly emphasized spending extra time with students to build relationships. Ms. Roberts also mentioned relationships to support students who were incarcerated.

> Right and it’s all about relationships as far as this setting goes…if I have a strong relationship with the student, they’re more likely to do what I want them to do. Not just for me but they know at this point in time that what I want for them is the best…so if that’s what I want for them, maybe if they don’t like it, maybe they think it’s better for me anyway…

Ms. Roberts believed that if an adult built a relationship with a student, then the student is more likely to be compliant and make choices endorsed by the institution. Mr. Enders shared this commitment,

> I think what MLK does best is relationships. Everyone here tries to get to know the kid on an individual level. When I was in high school, most of the teachers didn’t know my name and for me that was ok. And I can’t imagine some of these kids surviving in schools like that.

As a new teacher, Mr. Enders focused on developing relationships with his students. Teachers in juvenile justice were observed working extremely long hours (school days lasting 9–11 h), grading through their lunches, and meeting with families and other people involved in students’ lives outside of school hours. Again and again, teachers discussed and were observed building relationships as one way to support students incarcerated students with disabilities.

Overall, it seems that special education support for students with disabilities was provided in mixed forms. For multiple reasons, including staff beliefs, allocation of time and services, and staff preparedness, special education services were not delivered regularly. Teachers cared very much for students as evidenced in

interviews and observations. However, care did not mean that students get services they were legally required to receive.

Gender Responsiveness in Juvenile Justice

Ability was not the only social identity marker for which teachers provided mixed amounts of support in juvenile justice. I asked Mr. Enders how he supported girls differently than boys.

> Um I guess I don't put much thought into it. Kids are kids. What I do is I protect myself in those terms. If I have one student by myself…I make sure that that's known…make sure that boundary lines are never broken and that we communicate in the open.

Here, Mr. Enders stated that all children are the same, therefore no changes in curriculum were necessary based on whom he is teaching. Gender responsiveness was not a goal for him. Instead, he felt the major adaptation would be to make clear the physical and emotional boundaries between his female students and himself.

Ms. Yalla, the principal at Hull shared a similar sentiment.

> They're just kids and I'm the adult and I expect things from them and they know that. And I'm not afraid of them ever. And I think they know that. I care about them genuinely and I think they know that. So it's just never been an issue.

When I asked how she the distinction between working with males and females, Ms. Yalla agreed with Mr. Enders, that her emphasis was on caring for all students in general instead of gender responsiveness.

As a female-only institution, teachers at Hull House felt differently. In its website and brochure, Hull advertised itself as using "female responsive principles" and committed to "female-specific services". Additionally, employees continually cited and discussed the gender responsiveness of Hull as a unique strength of the institution. Ms. Roberts explained some features that made Hull female responsive.

> Well, like, the way things are designed are very much that way…for instance, even the way our dining hall is set up, it's right next to the nurse's station. That's done on purpose; it's not an accident. It's because girls tend to have more problems with eating disorders than males statistically. So the nurse can watch their eating habits…We're also set up to have individual rooms, although they might be small, but they're not bunked with other girls.

Here Ms. Roberts shared different surveillance methods that were gender specific. Every Hull staff interviewed mentioned the nurse's station next to the cafeteria as a way gender was being addressed. This is not to imply these efforts were not useful. Considering how incarceration settings have been historically created for men and boys, it takes very small steps to begin to become gender responsive. Ms. Hand, an administrator, provided some other basics.

> Well, it's my understanding that when my boss took over this sight, the girls were having to wear boxer shorts which makes it very difficult when it's your time of the month. So she has done some very basic things for the girls because corrections historically have been set up for men. So just getting them panties (laughing), I mean that's a first step…getting them sports bras cuz they run everyday so they need to have support.

Gender responsiveness was defined by meeting needs such as providing the girls appropriate undergarments and surveilling their eating and relationships.

Gender norms were also enforced via socializing practices that were meant to "teach both to and through the practices (Gutiérrez and Larson 1994). I observed these ritual and routines enforced throughout the school day and often took priority over educational instruction (see Annamma et al. 2013b for additional information). One socializing practice was the expectation for all girls to sit up with backs straight, knees touching, and feet together. This posture aligns with expectations of normative femininity and was something the institution was heavily invested in reinforcing. In one class I observed, class was interrupted to enforce these practices 18 times in 45 min; in another 45-min class, 26 min of class time was used to implement these routines. This practice became another thing girls were surveilled for consistently in the name of gender responsiveness.

One Hull teacher attempted to include gender responsiveness into the curriculum when she could. Ms. Cradler discussed attempts to include women more prominently in her course content such as including more books with female lead characters as well as studying women's poetry. Here she illustrated gender responsiveness in her class through students using literary criticism to analyze the Hunger Games.

Ms. Cradler: So there's lots of good stuff in there for feminists. And lots of good stuff in there for anti-feminists too
SAA: What is the anti-feminist component?
Ms. Cradler: A feminist looks at the role in which a woman is, she's made to play the woman character…the anti-feminist is how has she stepped out of that woman character and become a strong individual

Though Ms. Cradler's definitions were unfamiliar to me, it was important to recognize that she was making efforts to be gender responsive in her curriculum with little guidance and support. Ms. Cradler saw value in providing strong women models for the girls and therefore she was willing to learn through trial and error. The level of discomfort Ms. Cradler was willing to tolerate to be gender responsive did not extend to race.

Race in Juvenile Justice

Race was not taken up by any teacher participant in the classroom in this study. Both in interviews and observations it is noted that teachers rarely mention race. Ms. Cradler and I discussed the absence of race in the curriculum.

SAA: In the brochure, it mentions that culture is addressed in education, do either of you do much cultural education in your classes? Or do you address race?

Ms. Cradler: I covered some stuff on Cinco de Mayo because so many of them think it's Mexican Independence Day…I think it's easier to integrate into the world history stuff than it was into my literature…I did, we read some different people in literature

SAA: Did you discuss those people in detail?

Ms. Cradler: Well, no, I told them ''this author is whatever the race'' and that's about it

Though Ms. Cradler mentioned reading ''different'' authors in literature, she did not explicitly address issues of culture or race except to teach her students the ''accurate'' history of Cinco de Mayo. Ms. Roberts had similar sentiments race and culture.

But I mean it's a little harder to integrate culture into science and math. Just because biology, or science and math aren't really culturally based. I mean math is pretty much the same anywhere you are. It's actually more like the universal language. I mean if I look at math that's done in Germany, or math that's done in South America or math that is here, it all looks the same.

Both teachers expressed a need to correct thinking about a cultural celebration but otherwise, had difficulty integrating culture or race into course content. Ms. Roberts believed that her subjects, science and math, were not culturally based and therefore, there was no need to discuss race. Mr. Enders responded similarly; he did not cover issues of race or cultural differences.

SAA: How do you address issues of race in the classroom?

Mr. Enders: I address it by not addressing it. I don't have really; I don't even know the right word. They are all just my students. I try to respect everyone's different cultural identity. I even talk to them about it, if that's the conversation…talk to them about different things they like to do or foods they like to eat, whatever it may be. But it's not a big part of the curriculum

Here Mr. Enders engaged in ''color blindness'',[3] where he ignored race in the name of equality (Bonilla-Silva 2006). Mr. Enders expressed similar beliefs as Ms. Roberts and Ms. Cradler, racial diversity and inequities were unnecessary to address in the classroom.

When I asked the special education teacher, Ms. Bryson, about the racial distribution of students in special education, she was not concerned. She stated, ''We have several Hispanic and several African American and we have regular

[3] Colorblindness is an ideology where racial inequity is attributed to nonracial dynamics (Bonilla-Silva 2006; Gotanda 1991). Though this is an important ideology to critique, the term ''colorblindness'' conflates the lack of sight with lack of understanding. In other words, blindness is equated with not knowing or ignorance. However not seeing something is not the same as not knowing something; blind people are knowers. So I put this term in quotes to remind us that we must examine our language. For more on the problems with the term colorblindness and an alternative, color-evasiveness, see Stubblefield, 2005.

white kids as well. I'd say it's pretty evenly distributed.'' Ms. Bryson's belief that disability was evenly distributed amongst the girls was inaccurate. At the time of the study, 26 of the 40 girls were of color, meaning there was significant racial disproportionality compared with both state and city demographics. Also 19 had disability labels and the majority of those were girls of color. Additionally, Ms. Bryson's use of regular to describe the white students implied that she saw the young women of color as irregular. Overall, only one teacher mentioned race in her classroom but none addressed racism or racial inequities at all.

Discussion

The meaning making and dispositions of juvenile incarceration teachers working with young women of color in special education revealed a complex negotiation. Teachers wanted to build relationships but were limited by the subscription to the girls' identity as criminal and the commitment to surveillance. Instead of a status that elicited support, teachers socially constructed racialized disability as another thing to surveil, perpetuating the commitment to whiteness as an identity and property in the Pipeline.

As whiteness is simultaneously an aspect of identity and a property interest, it is something that can both be experienced and deployed as a resource. Whiteness can move from being a passive characteristic as an aspect of identity to an active entity that—like other types of property—is used to fulfill the will and to exercise power. (Harris 1993, p. 1734).

In the responses of teachers to addressing disability, gender, and race with students, their subscription to a white identity and to whiteness as property was apparent. Whiteness as an identity was revealed in a hesitancy, or even fear, to discuss race in any substantive way. The solution for teachers was to engage in "color blindness" as a way to deflect acknowledging racial privilege (Bonilla-Silva 2006). Teachers often avoided talking about race and subscribe to the myth of meritocracy to explain why there are racial inequities (Solomona et al. 2005). The implicit message of refusing to talk about race and racial inequities in the Pipeline was clear: ''There is nothing to examine. Racial inequities are natural. You deserve to be here; you are guilty''.

Whiteness as property manifested when discussing the intangible benefits of ability and innocence. Findings revealed that education of girls of color with and without disabilities looked almost identical. It was assumed that none of the girls could control themselves and so all had to be treated as if they have emotional disabilities. Therefore none had access to ability, which was an intangible benefit of property based in whiteness. Historically, whiteness has been one of the unmarked norms which perceptions of ability have been based on and this continues into the present day (Leonardo and Broderick 2011; Baynton 2001). In education, one way this is manifested is in the consistent patterns of overrepresentation of children of color in special education, particularly in emotional disabilities (Harry and Klingner 2006).

In juvenile incarceration, girls with disabilities could not assume they would get any individual emotional support as those processes were already built into the system for the entire population. Components such as access to therapists, commitments to de-escalation, and relationship building made many school personnel feel that no additional individual supports were needed for students with emotional disability labels. However, this view that many girls with an emotional disability display the same behaviors as the girls without disability labels who are incarcerated resulted in tensions and inconsistent practices. If they were displaying similar behaviors, why were some girls labeled with a disability while others were not? Additionally, if there was nothing more being done for children with disabilities, how does the extremely restrictive incarceration setting meet their educational needs? These concerns were especially important because all of the Individualized Education Plans (IEPs) I examined specifically stated the student needed a restrictive setting to get her individual education needs addressed.

Though the settings were generally smaller, 8–10 students in a class with a maximum of 15, individualization was often not evident. I was initially heartened by the potential education that could be provided in a small setting, but instead found students were not getting the individualized education federally mandated through their IEPs. ''Although incarcerated youth eligible for special education services are entitled to the same substantive and procedural rights afforded to youth in public schools, correctional facilities have been slow to respond to the requirements of…applicable laws.'' (Leone et al. 2002). This study confirmed what research in juvenile incarceration found over a decade ago; services for students with disabilities in juvenile prisons continue to be often inadequate.

Innocence was another intangible benefit of whiteness as property to which the girls had minimal access. Findings indicated that teachers' dispositions were a combination of suspicion and relationship building. Teachers reported wanting to meet the needs of students. However requests for help were regularly met with suspicion and surveillance. Though many teachers subscribed to a relational approach, one that focused on building trust between the teacher and student (Gregory and Ripski 2008), the teachers' views of these young women of color with disabilities as criminals limited the impact of this approach. Instead, girls of color were under constant surveillance, always assumed to be criminal. DisCrit emphasized ''the social constructions of race and ability and yet recognizes the material and psychological impacts of being labeled as raced or dis/abled, which sets one outside of the western cultural norms'' (Annamma et al. 2013b). Teachers did not acknowledge that their students had faced systemic inequities due to the social construction of their race and ability. In juvenile justice the impact of being labeled was limited access to innocence, another intangible benefit of the property of whiteness.

Disability in public schools was often imagined as something to accommodate and modify for; in juvenile justice it was another thing to surveil (Young et al. 2010). When girls asked for help, they aroused suspicion of manipulation and deviousness. Instead of immediately helping, teachers treated them with refusal and responses to try again, and harder. Only after girls prove they really could not do

something through a complex and undetermined process that was different for each teacher, could they access academic support.

Implications for Teacher Education

Teacher dispositions and meaning making around young women of color with disabilities revealed a subscription to whiteness as an identity and property, which included intangible concepts of ability and innocence. Teachers stood in unsteady territory in schools, ''both victims and collaborators with a system that structurally neglects'' youth of color (Valenzuela 1999). Following are implications for teacher education rooted in CRT and DisCrit, which can productively build on some of the tensions teachers faced.

An implication that arose directly from these findings was that teachers need training in theories of race, racism, and inequities that recognize the historical legacy of whiteness as property (Lynn 2004; Milner 2008; Parker and Stovall 2004). Delgado and Stefancic (2001) note that ''Color-blind'' legal approaches can "remedy only the most blatant forms of discrimination" (p. 7). This applies to pedagogy as well. Teacher education must explicitly reject approaches that ignore systemic injustices and instead explicitly connect these racial inequities (e.g., the achievement gap, disciplinary exclusion, special education assignment, and the entire School to Prison Pipeline) with the seemingly race-neutral education laws, policies, and practices that create and enforce these patterns (Ladson-Billings and Tate 1995). In addition to pedagogy and content, teachers must be supported in recognizing their current dispositions, connect their evolving understanding of racial inequities to how their dispositions change over time, and learn how their dispositions impact classroom interactions (Cochran-Smith and Zeichner 2005; Villegas 2007). This could have a deep impact on teacher's dispositions and meaning making surrounding young women of color. When teachers have a true sense of the systemic inequities their students face and their own evolving dispositions, they may be more likely to develop an ethic of caring. This authentic ethic of caring would replace the disposition of suspicion and be rooted in sustained, reciprocal relationships between students and teachers; one where teachers are invested in their students' lives and students therefore become invested in the institution of schooling (Valenzuela 1999).

Another implication was that teacher education programs must recognize special education status as more than a medical diagnosis but as a relational system where oppression of disability cannot exist without the privilege of ability (Leonardo and Broderick 2011). The social construction of disability and its interdependence on race and other intersections must be better understood (Annamma et al. 2013a). Information on the intertwining legacy of school integration, disciplinary exclusion, and special education should be provided (Connor and Ferri 2005). Teacher education would then conceive of inclusive education as a civil right for all students, not something simply for white, middle class students (Zion and Blanchett 2011).

Once teachers understand the need for inclusive education, they may recognize the need to design classrooms that reach and teach all learners. Complementary classroom frameworks such as Universal Design for Learning (UDL) and Critical

Race Pedagogy are two approaches that can provide support for historically marginalized students of color with and without disabilities (Lynn 2004; Hitchcock et al. 2002). Both frameworks recognize teacher dispositions, the classroom climate, and curriculum as potential barriers to learning and re-imagine these each of these as counter-hegemonic (Duncan-Andrade and Morrell 2008; Karger et al. 2012). UDL recognizes learning differences as normal, instead of deviant, and plans for these variances by providing multiple access points in each lesson, different ways to meet the same objective for all students (Udvari-Solner et al. 2005). Critical race pedagogy provides an opportunity for children of color to examine the dominant ideology in society and traditional classrooms, links these to the inequities they face, and supports students in searching for solutions (Parker and Stovall 2004).

Young women of color with disabilities are some of our most marginalized students and because of the Pipeline, are increasingly educated in incarceration settings. ''In brief, their embodiment and positioning reveals ways in which racism and ableism inform and rely upon each other in interdependent ways'' (Annamma et al. 2013a, p. 5). Teacher education must better prepare teachers to recognize the inequities these students face when they enter their classrooms and the intersectional identities on which these inequities are built. Young women of color are funneled into and educated in the Pipeline differently than young men. Often young men are considered threats while young women of color are penalized for disrupting normative notions of femininity built on white, middle class expectations (Morris 2012). Training teachers in theoretical grounding of race, along with its intersections with other subordinated identity markers such as disability, and gender, is one way to disrupt the Pipeline. Changing teacher dispositions and pedagogical practices honors the commitment of CRT to activism and provides children of color with a more equitable education (Bell 1980).

Conclusion

Critical Race Theory provided a lens to study educational inequities in the Pipeline. DisCrit allowed me to focus that lens, together creating a conceptual framework that recognized the intersections of race, gender, and ability, and how the Pipeline manifested itself differently based on those intersections.

There were some clear limitations to this study. First, this was a relatively small group of teachers. Due to extremely busy schedules (see Methods for more information), I was not able to interview all teachers in the schools or even all teachers I observed. Therefore data was harder to contextualize and teachers could not always explain their rationale for interactions in the classroom and school. Yet over the months that I spent at both institutions, I found that the teachers I interviewed were a strong representative sample of the dispositions of teachers at both institutions. Another limitation was the focus on the population ''girls of color'', which can gloss over the differences between racialized populations. For example, African American girls have been disciplined and arrested in schools at higher rates than Latina, Asian, and Native American girls nationally (U.S. Department of Education Office for Civil Rights 2014). By including a more general

population of young women of color, different mechanisms of surveillance and criminalization may be missed. However, it is important to recognize that young women of color also experienced similarities in mechanisms that promote surveillance and criminalization as well, which is what this study highlights.

In public schools, girls of color are subjected to disproportionate exclusionary discipline for infractions such as inappropriate dress, defiance, and fighting (Blake et al. 2011). Young women of color are often steered to the Pipeline when they deviate ''…from the social norms that define female behavior according to a narrow, white middle-class definition of femininity, they are deemed nonconformative and thereby subject to criminalizing responses'' (Morris 2012, p. 5). Innocence and ability are clear intangible benefits of whiteness as property that are withheld throughout the Pipeline. Teacher dispositions revealed that once students were incarcerated, the teacher subscription to the identity of criminal was reinforced because of that imprisonment. Incarcerated young women of color were constructed as disobedient, distrustful, and disabled, and then subjected to socializing practices that enforced normative femininity upon them.

Teacher education had been put forth as one access point to dismantle the School to Prison Pipeline. Whiteness as property can be a useful analytic tool to better understand teacher dispositions, teacher education, and ways education resources and benefits are inequitably distributed. Specifically, the construct of whiteness as property can assist teachers in acknowledging young women of color's lack of access to innocence and ability, examining and re-defining their own dispositions towards these girls, and engaging in authentic notions of caring. Though it certainly cannot disrupt the current societal commitment to mass criminalization and incarceration on its own, changing teacher dispositions provides a chance for students in their classes better chances to flourish instead of fail (Villegas 2007). This is particularly important for young women of color, many whom are being criminalized because of lack of access to ability and innocence. Teacher education can reject the subscription to whiteness as property and instill in its candidates a commitment to view young women of color as assets in their classrooms.

Acknowledgments I would like to take the time to thank each of the readers who has offered support in the development of this paper. Thank you to Janette Klingner, Christina Paguyo, and Darrell Jackson. Your expertise and feedback strengthened this paper. Additionally, thank you to the guest editors of the Urban Review, Daniella Cook and Rema Reynolds, who organized this needed special issue on CRT & teacher education. I appreciate the time each of you committed in order for to grow the concepts presented in this paper. Finally, thanks to the AERA Minority Fellowship in Education Research Program, which made this research possible through the Minority Dissertation Fellowship Award.

References

American Civil Liberties Union (2008). School to Prison Pipeline: Talking points. Retrieved from http://www.aclu.org/racial-justice/school-prison-pipeline-talking points.

Annamma, S. A., Boelé, A. L., Moore, B. A., & Klingner, K. (2013a). Challenging the ideology of normal in schools. *International Journal of Inclusive Education, 17*(12), 1278–1294. doi:10.1080/13603116.2013.802379.

Annamma, S. A., Connor, D., & Ferri, B. (2013b). Dis/ability critical race studies (DisCrit): Theorizing at the intersections of race and dis/ability. *Race Ethnicity and Education, 16*(1), 1–31.

Aoki, K. (1997). Critical legal studies, Asian Americans in U.S. law & and culture, Neil Gotanda and me. *Asian Law Journal, 4*, 19.

Artiles, A. J. (1998). The dilemma of difference: Enriching the disproportionality discourse with theory and context. *Journal of Special Education, 32*(1), 32–36.

Artiles, A. J., Bal, A., & Thorius, K. A. K. (2010). Back to the future: A critique of response to intervention's social justice views. *Theory Into Practice, 49*(4), 250–257.

Arzubiaga, A. E., Artiles, A. J., King, K. A., & Harris-Murri, N. (2008). Beyond research on cultural minorities: Challenges and implications of research as situated cultural practice. *Exceptional Children, 74*(3), 309–327.

Bahena, S., Cooc, N., Currie-Rubin, R., & Ng, M. (2012). *Disrupting the School-to-Prison Pipeline*. Harvard Educational Review.

Baynton, D. C. (2001). Disability and the justification for inequality in American History. In P. Longmore & L. Umansky (Eds.), *The new disability history: American perspectives* (pp. 33–57). New York: New York University Press.

Bell, D. (1980). Brown v Board of the Education and the interest convergence dilemma. *Harvard Law Review, 93*, 518–533.

Bell, C. (2006). Introducing White disability studies: A modest proposal. In L. J. Davis (Ed.), *The disability studies reader* (2nd ed., pp. 275–282). New York: Routledge.

Blake, J., Butler, B., Lewis, C., & Darensbourg, A. (2011). Unmasking the inequitable discipline experiences of urban Black girls: Implications for urban educational stakeholders. *The Urban Review, 43*(1), 90–106.

Blanchett, W. J., Klingner, J. K., & Harry, B. (2009). The intersection of race, culture, language, and disability: Implications for urban education. *Urban Education, 44*, 389–409.

Bonilla-Silva, E. (2006). *Racism without racists: Color-blind racism and the persistence of racial inequality in America*. Lanham: Rowman & Littlefield Publishers.

Brantlinger, E. (1997). Using ideology: Cases of non-recognition of the politics of research and practice in special education. *Review of Educational Research, 67*(4), 425–459.

Brayboy, B. M. J. (2006). Toward a tribal critical race theory in education. *The Urban Review, 37*(5), 425–446.

Brown, R. N. (2009). *Black girlhood celebration: Toward a hip-hop feminist pedagogy*. New York: Peter Lang.

Buras, K. L. (2011). Race, charter schools, and conscious capitalism: On the spatial politics of whiteness as property (and the unconscionable assault on black New Orleans). *Harvard Educational Review, 81*(2), 296–331.

Cochran-Smith, M., & Zeichner, K. M. (2005). Executive summary. In M. C. Smith & K. M. Zeichner (Eds.), *Studying teacher education: The report of the AERA panel on research and teacher education* (pp. 1–36). Hillsdale, NJ: Lawrence Erlbaum.

Collins, P. H. (1990). *Black feminist thought: Knowledge, consciousness, and the politics of empowerment*. New York: Routledge.

Collins, K. M. (2003). *Ability profiling and school failure*. Mahwah, NJ: Lawrence, Erlbaum Press.

Connor, D. J. (2008). Not so strange bedfellows: The promise of disability studies and critical race theory. In S. L. Gabel & S. Danforth (Eds.), *Disability and the politics of education: An international reader* (pp. 451–476). New York: Peter Lang.

Connor, D. J., & Ferri, B. A. (2005). Integration and inclusion: A troubling nexus: race, disability, and special education. *The Journal of African American History*, *90*(1/2), 107–127.

Connor, D. J., Gabel, S. L., Gallagher, D. J., & Morton, M. (2008). Disability studies and inclusive education: Implications for theory, research, and practice. *International Journal of Inclusive Education, 12*(5–6), 441–457.

Crenshaw, K. (1993). Mapping the margins: Intersectionality, identity politics, and violence against women of color. *Stanford Law Review, 43*, 1241–1299.

Crenshaw, K., Gotanda, N., Peller, G., & Thomas, K. (1995). *Critical race theory: The key writings that formed the movement*. New York: The New Press.

Darling-Hammond, L. (2006). Securing the right to learn: Policy and practice for powerful teaching and learning. *Educational Researcher, 35*(7), 13–24.

Davis, A. (2003). *Are prisons obsolete?*. New York: Seven Stories Press.

Delgado, R. (2010). Rodrigo's reconsideration: Intersectionality and the future of critical race theory. *Iowa Law Review, 96*, 1247–1288.

Delgado, R., & Stefancic, J. (2001). *Critical race theory: An introduction*. New York: New York, University Press.

Donnor, J. (2013). Education as the property of whites: African Americans continued quest for good schools. In M. Lynn & A. Dixson (Eds.), *Handbook of critical race theory in education*. New York, NY: Routledge.

Donovan, S., & Cross, C. T. (2002). *Minority students in Special and Gifted Education*. Washington, D.C: National Academy Press.

Douglas, F. (1883). *The Color Line in America.* Retrieved on December 11, 2011. http://www.britannica.com/blackhistory/article-9399839.

Duncan-Andrade, J. M. R., & Morrell, E. (2008). *The art of critical pedagogy: Possibilities for moving from theory to practice in urban schools*. New York: Peter Lang.

Erevelles, N., & Minear, A. (2010). Unspeakable offenses: Untangling race and disability in discourses of intersectionality. *Journal of Literary & Cultural Disability Studies, 4*(2), 127–145.

Erickson, F. (1996). Inclusion into what? Thoughts on the construction of learning, identity and affiliation in the general education classroom. In D. Speece & B. Keogh (Eds.), *Research on classroom ecologies: Implications for inclusion of children with learning disabilities* (pp. 91–105). Mahwah, NJ: Lawrence Erlbaum Associates.

Erickson, F. (1998). Qualitative research methods for science education. In B. J. Fraser & K. G. Tobin (Eds.), *International handbook on science education* (pp. 1155–1173). Great Britain: Kluwer Academic Publishers.

Fasching-Varner, K. J., & Mitchell, R. (2013). CRT's challenge to educator's articulation of abstract liberal perspectives of purpose. In A. Dixson & M. Lynn (Eds.), *Handbook of critical race theory in education* (pp. 355–367). New York, NY: Routledge.

Ferguson, A. A. (2000). *Bad boys: Public schools in the making of Black masculinity*. Ann Arbor, MI: The University of Michigan Press.

Ferri, B. A. (2010). A dialogue we've yet to have: Race and disability studies. In C. Dudley-Marling & A. Gurn (Eds.), *The myth of the normal curve*. New York: Peter Lang.

Ferri, B., & Connor, D. (2009). ''I was the special ed girl:'' (En)gendering disability from the standpoint of urban working class young women of color. *Journal of Gender and Education, 22*, 105–121.

Gay, G. (2002). Culturally responsive teaching in special education for ethnically diverse students: Setting the stage. *International Journal of Qualitative Studies in Education, 15*(6), 613–629.

Gillborn, D. (2005). Education policy as an act of White supremacy: Whiteness, critical race theory and education reform. *Journal of Education Policy, 20*(4), 485–505.

Glaser, B. G., & Strauss, A. L. (1967). *The discovery of grounded theory: Strategies for qualitative research*. Chicago: Aldine.

Goodwin, M. (2003). Gender, race, and mental illness: The case of Wanda Jean Allen. In A. K. Wing (Ed.), *Critical race feminism: A reader* (2nd ed., pp. 228–237). New York: New York University Press.

Gotanda, N. (1991). A Critique of Our Constitution is Color-Blind. *Stanford Law Review,* 1–68.

Gregory, A., & Ripski, M. (2008). Adolescent trust in teachers: Implications for behavior in the high school classroom. *School Psychology Review, 37*, 337–353.

Gutiérrez, K., & Larson, J. (1994). Language borders: Recitation as hegemonic discourse. *International Journal of Education Reform, 3*, 22–36.

Gutiérrez, K. D., & Stone, L. D. (1997). A cultural-historical view of learning and learning disabilities: Participating in a community of learners. *Learning Disabilities Research & Practice, 12*(2), 123–131.

Haney-Lopez, I. (1996). White by law. *Critical Race Theory: The cutting edge,* 542–50.

Harris, A. P. (1990). Race and essentialism in feminist legal theory. *Stanford Law Review, 42*(3), 581–616.

Harris, C. (1993). Whiteness as property. *Harvard Law Review, 106*, 1709–1791.

Harry, B., & Klingner, J. (2006). *Why are so many minority students in special education?*. New York: Teachers College.

Harry, B., Klingner, J., Sturges, K. M., & Moore, R. F. (2002). Of rocks and soft places: Using qualitative methods to investigate disproportionality. *Racial inequity in special education*, 71–92.

Hitchcock, C., Meyer, A., Rose, D., & Jackson, R. (2002). Providing new access to the general curriculum universal design for learning. *Teaching Exceptional Children*, *35*(2), 8–17.

Hollins, E. R., & Torres Guzman, M. (2005). *Research on preparing teachers for diverse populations* (pp. 477–548). Studying teacher education: The report of the AERA panel on research and teacher education.

Houchins, D. E., & Shippen, M. E. (2012). Welcome to a special issue about the school-to-prison pipeline: The pathway to modern institutionalization. *Teacher Education and Special Education, 35*(4), 265–270. doi:10.1177/088840641.

Johnson, B. (1998). *The Feminist difference: Literature, psychoanalysis, race, and gender*. Cambridge: Harvard University Press.

Johnston-Parsons, M. (2007). Where's the theory in teacher education? Researchers gazing from multiple theoretical perspectives. Paper presented at the annual meeting of the American Educational Research Association, Chicago.

Jones, N. (2009). *Between good and ghetto: African American girls and inner-city violence*. Rutgers Series in Childhood Studies: Rutgers University Press.

Karger, J., Rose, D. H., & Boundy, K. B. (2012). Applying universal design for learning to the education of youth in detention and juvenile corrections. In S. Bahena, N. Cooc, R. Currie-Rubin, & M. Ng (Eds.), *Disrupting the School-to-Prison Pipeline* (pp. 119–143). Cambridge, MA: Harvard Educational Review.

Katsiaficas, D., Futch, V. A., Fine, M., & Selcuk, S. (2011). Everyday hyphens: Exploring youth identities with methodological and analytic pluralism. *Qualitative Research in Psychology, 8*(2), 120–139.

Kim, C., Losen, D., & Hewitt, D. (2010). *The school-to-prison pipeline: Structuring legal reform*. New York: New York University Press.

Ladson-Billings, G. (1995). But that's just good teaching! The case for culturally relevant pedagogy. *Theory into practice, 34*(3), 159–165.

Ladson-Billings, G. (1998). Just what is critical race theory and what's it doing in a nice field like education? *International Journal of Qualitative Studies in Education, 11*(1), 7–24.

Ladson-Billings, G. (2005). The evolving role of critical race theory in educational scholarship. *Race Ethnicity and Education, 8*(1), 115–119.

Ladson-Billings, G., & Tate IV, W. F. (1995). Toward a critical race theory of education. *Teachers College Record, 97*(1), 47–68.

Leonardo, Z. (2004). The color of supremacy: Beyond the discourse of 'white privilege'. *Educational Philosophy and Theory, 36*(2), 137–152. doi:10.1111/j.1469-5812.2004.00057.x.

Leonardo, Z., & A. Broderick. (2011). Smartness as property: A critical exploration of intersections between whiteness and disability studies. *Teachers College Record 113*, 10. http://www.tcrecord.org-ID 16431.

Leone, P. E., Meisel, S. M., & Drakeford, W. (2002). Special education programs for youth with disabilities in juvenile corrections. *Journal of Correctional Education*, *53*(2), 46–50.

Losen, D. J., & Orfield. G. (Eds.). (2002). *Racial inequity in special education*. Cambridge, MA: Harvard Education Press.

Losen, D. J., & Skiba, R. J. (2010). *Suspended education: Urban middle schools in crisis*. Montgomery, AL: Southern Poverty Law Center.

Lynn, M. (1999). Toward a critical race pedagogy a research note. *Urban education, 33*(5), 606–626.

Lynn, M. (2004). Inserting the 'race' into critical pedagogy: An analysis of 'race-based epistemologies'. *Educational Philosophy and Theory, 36*(2), 153–165. doi:10.1111/j.1469-5812.2004.00058.x.

Matsuda, M. (1987). Looking to the bottom: Critical legal studies and reparations. *Harvard Civil Rights-Civil Liberties Law Review, 22*, 323–399.

Meiners, E. R. (2007). *Right to be hostile: Schools, prisons, and the making of public enemies*. New York: Routledge.

Merleau-Ponty, M. (1962). *Phenomenology of perception: An introduction*. London: Routledge Press.

Milner, H. R. (2008). Critical race theory and interest convergence as analytic tools in teacher education policies and practices. *Journal of Teacher Education, 59*(4), 332–346.

Minh-Ha, T. (1989). *Woman, native, other* (Vol. 108). Bloomington: Indiana University Press.

Mohanty, C. T. (1988). Under Western eyes: Feminist scholarship and colonial discourses. *Feminist Review, 30*, 61–88.

Morris, M. (2012). Race, gender, and the school-to-prison pipeline: Expanding our discussion to include Black girls. In *African American policy forum Retrieved from* http://aapf.org/wpcontent/uploads/2012/08/Morris-Race-Gender-and-the-School-to-Prison-Pipeline.pdf.

National Council on Crime & Delinquency (2008). A call for gender equity for girls in the juvenile justice system.

National Education Association (2007). Truth in labeling: Disproportionality in Special Education.

Oswald, D. P., Coutinho, M. J., & Best, A. M. (2002). Community and school predictors of overrepresentation of Minority children in Special Education. In D. Losen & G. Orfield (Eds.), *Racial inequality in Special Education*. Cambridge, MA: Harvard Education Press.

Parker, L., & Stovall, D. O. (2004). Actions following words: Critical race theory connects to critical pedagogy. *Educational Philosophy and Theory, 36*(2), 167–182. doi:10.1111/j.1469-5812.2004.00059.x.

Parrish, T. (2002). Racial disparities in the identification, funding, and provision of special education. In D. J. Losen & G. Orfield (Eds.), *Racial inequality in special education* (pp. 15–37). Cambridge, MA: Harvard Education Press.

Patton, J. W. (1998). The disproportionate representation of African–Americans in special education: Looking behind the curtain for understanding and solutions. *Journal of Special Education, 32*, 25–31.

Quinn, M. M., Rutherford, R. B., Leone, P. E., Osher, D. M., & Poirier, J. M. (2005). Youth with disabilities in juvenile corrections: A national survey. *Exceptional Children, 71*, 339–345.

Rabaka, R. (2007). *W.E.B. DuBois and the problems of the twenty-first century: An essay on Africana critical theory*. Lanham, MD: Lexington. Books/Rowman & Littlefield Publishers.

Rabaka, R. (2010). *Against epistemic apartheid: W.E.B. Du Bois and the disciplinary decadence of sociology*. Lanham, MD: Lexington Books/Rowman & Littlefield Publishers.

Ravitch, S. M., & Riggan, M. (2012). *Reason & rigor: How Conceptual frameworks guide research*. Thousand Oaks, CA: Sage.

Rios, V. M. (2011). *Punished: Policing the lives of Black and Latino boys*. New York: University Press.

Seidman, I. E. (2006). *Interviewing as qualitative research: A guide for researchers in education and the social sciences* (2nd ed.). New York: Teachers College Press.

Solomona, R. P., Portelli, J. P., Daniel, B. J., & Campbell, A. (2005). The discourse of denial: How white teacher candidates construct race, racism and 'white privilege'. *Race Ethnicity and Education, 8*(2), 147–169.

Solórzano, D. G., & Bernal, D. D. (2001). Examining transformational resistance through a critical race and latcrit theory framework: Chicana and Chicano students in an urban context. *Urban Education, 36*(3), 308–342.

Solórzano, D. G., & Yosso, T. J. (2001a). From racial stereotyping and deficit discourse toward a critical race theory in teacher education. *Multicultural Education, 9*(1), 2–8.

Solórzano, D. G., & Yosso, T. J. (2001b). Critical race and LatCrit theory and method: Counter-storytelling. *International Journal of Qualitative Studies in Education, 14*(4), 471–495.

Stubblefield, A. (2005). *Ethics along the color line*. Ithaca, N.Y.: Cornell University Press.

The Advancement Project. (2010). *Test, punish, and push out: How zero tolerance and high-stakes testing funnel youth into the school to prison pipeline*. Washington, D.C: The Advancement Project.

Udvari-Solner, A., Villa, R. A., & Thousand, J. S. (2005). Access to the general education curriculum for all: The universal design process. In R. A. Villa & J. S. Thousand (Eds.), *Creating an inclusive school* (2nd ed., pp. 134–155). Alexandria, VA: Association for Supervision and Curriculum Development.

U.S. Department of Education Office for Civil Rights (2014): *Data Snapshot (School Discipline)*.

Valenzuela, A. (1999). *Subtractive schooling: Issues of caring in education of US-Mexican youth*. State University of New York Press.

Vaught, S. (2012). Institutional racist melancholia: A structural understanding of grief and power in schooling. In S. Bahena, N. Cooc, R. Currie-Rubin, & M. Ng (Eds.), *Disrupting the School-to-Prison Pipeline*. Harvard Educational Review.

Villegas, A. M. (2007). Dispositions in teacher education a look at social justice. *Journal of Teacher Education, 58*(5), 370–380.

Wald, J. & Losen, D., (2003). Defining and redirecting a school-to-prison pipeline. Retrieved from The Civil Rights Project at Harvard University website: http://www.woodsfund.org/community/Folder_1036081004377/File_1084877618748.

Ware, L. (2001). Writing, identity, and the other: Dare we do disability studies? *Journal of Teacher Education, 52*(2), 107–123.

Watts, I. E., & Erevelles, N. (2004). These deadly times: Reconceptualizing school violence by using critical race theory and disability studies. *American Educational Research Journal, 41*, 271–299.

Willen, S. S. (2007). Toward a critical phenomenology of ''illegality'': State power, criminalization, and objectivity among Undocumented Migrant Workers in Tel Aviv, Israel. *International Migration, 45*, 3.

Wing, A. (2003). *Global critical race feminism: An international reader*. New York: New York University Press.

Winn, M. (2011). *Girl time: Literacy, justice, and the school-to-prison pipeline*. New York, NY: Teachers College Press.

Young, M., Phillips, R., & Nasir, N. (2010). Schooling in a youth prison. *Journal of Correctional Education, 61*(3), 203–222.

Zion, S. D., & Blanchett, W. J. (2011). [Re]conceptualizing inclusion: Can critical race theory and interest convergence be utilized to achieve inclusion and equity for African American students? *Teachers College Record, 113*, 2186–2205.