INTEGRATION AND INCLUSION—
A TROUBLING NEXUS:
RACE, DISABILITY, AND
SPECIAL EDUCATION

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There are perhaps five million children in the United States who are colored. There are close to five million other children who will be directly affected by this decision. I am not speaking of the majority of white children, many of whom have been undoubtedly injured spiritually by the philosophy and practice of segregation. I am speaking of disabled children, who are "different," not because of color but because of blindness, deafness; because they are crippled, have cerebral palsy, or speech defects, or epilepsy; or are what we call "retarded." These children we have also segregated. . . . All of these children, some with real disabilities, others with the artificial disability of color, are affected by this great decision.

—Lillian Smith, Letter to the Editor, *New York Times,* 1954[1]

Responses of the southern white establishment to the U.S. Supreme Court's *Brown v. Board of Education* decision were quick, generating powerful repercussions. Historian Waldo E. Martin, Jr., pointed out that the "Southern Manifesto," drafted by Senators Strom Thurmond of South Carolina and Harry Byrd of Virginia, provoked such resistance that "southern school desegregation was effectively delayed until the courts intervened in the late 1960s."[2] Other extreme responses ranged from closing state-funded schools in Virginia, (in some instances causing African American children to lose four years of formal education), to deploying the National Guard at Little Rock, Arkansas, to ensure integration.[3] In addition, "pupil placement" laws were approved from the mid-1950s allowing local districts to assign students according to academic and psychological criteria including preparation and aptitude, as well as "morals, conduct, health, and personal standards of the pupil."[4] However, despite these external measures, we argue that it was the internal re-structuring of schools that effectively maintained segregation after *Brown*. Perhaps above all, an increase in the use of testing to determine the Intelligence Quotient (IQ) of students served to justify the academic tracking of students according to "abilities."[5] In addition to tracking, a response to the integration of students of color was the increase in special classes, located in different parts of the school building, and even in separate schools. In one

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example, perhaps to curb the flight of white students from the district, school officials in Washington, DC, placed over 24 percent of their newly admitted African American students in separate special education classrooms. In comparison, the number of white students in special education between 1955 and 1956 was only 3 percent. In fact, within Washington, DC, between 1955 and 1956, special education classes in schools doubled in enrollment; over 77 percent of students in these classes were African American.[6] The response of school officials to integration in the late 1950s and stretching throughout the 1960s was to develop structures and procedures that continued to maintain racial segregation (or at least minimize the possibilities for integration). In response to such widespread institutionalized practices, several important lawsuits successfully challenged the status quo.

Diana v. State Board of Education (1970) and *Larry P. v. Riles* (1971–79) were landmark legal cases that confronted important biases inherent in standardized public school assessment procedures.[7] The first case, *Diana*, featured a class action suit filed on behalf of nine Latino children who had been forced to take an individually administered IQ test in English, and as a result were classified as Educable Mentally Retarded (EMR). However, when retested by a Hispanic examiner, eight children were found not to be EMR. In the second case, *Larry P.*, plaintiffs claimed the overrepresentation of minority children in EMR classes in the San Francisco public schools was due to educational practices, including teacher bias. These two cases clearly revealed that school personnel, tests, and testing practices played a major role in deciding who received the label of "disabled" and were thus responsible for the disproportionate placement of racial and linguistic minorities in separate special education classes. These practices also publicly highlighted how special education, along with ability tracking, was unofficially serving as a tool to resegregate classrooms along racial and ethnic lines, despite the *Brown* ruling that determined racially segregated schools were unconstitutional.

Of equal importance, the cases drew attention to how special education labeling and placement decisions were primarily based on stereotypic beliefs about white intellectual superiority. The *Diana* and *Larry P.* cases were the latest efforts to question the widespread use of purportedly "scientific" and objective measures to gauge intellectual ability. The IQ score as a measure of innate, fixed intellectual abilities had been challenged since the 1920s. From that time these evaluation instruments have been used to reinforce social hierarchies among racial and ethnic groups.[8] Although many educators continued to consider them relatively neutral and valid, others came to view them as a mechanism of institutionalized racism, manifesting cultural and linguistic biases favoring norms predicated upon values and expectations of America's white, middle-class professionals.[9]

SPECIAL EDUCATION AND ACCOUNTABILITY

Despite reforms over the last thirty years spurred by *Diana* and *Larry P.*, it is troubling that a disproportionate number of students from racial, ethnic, and linguistic minority groups continue to be referred for special education services, and a large percentage are evaluated, labeled "disabled," and subsequently placed in segregated programs.[10] Related to this phenomenon is the overall racial imbalance of the teaching corps. It has been estimated that 90 percent of public school teachers are white, while 40 percent of students are from racial minority groups.[11] Cultural, social class, and linguistic differences have historically influenced teacher perceptions of students, often resulting in misunderstandings and practices that pathologize, rather than celebrate, human difference.[12] Current critiques of special education call attention to the roles of psychologists, educational evaluators, and teachers in monitoring and classifying children in relation to a mythic "norm."[13] Social scientists Hervé Varenne and Ray McDermott noted the assumed complicity of specialists within the field of education in the disability labeling process, and pointed out that, "in institutional America, the only tasks professionals may, indeed must, perform as professionals given specific authority by the State is to document what is wrong. . . . This is their job and responsibility."[14] In addition to being duty-bound to "locate" disability, specialists in education, like the instruments they use, are not without bias.

Because of overrepresentation of students of color in disability categories, the field of special education has come under increased scrutiny from the United States Department of Education Office for Civil Rights (OCR).[15] Furthermore, a growing number of special education scholars have challenged the scientific-medical framework that posits disability as a deficit, a pronounced deviation from the norm (discussed in more detail below).[16] Instead, these scholars prefer to conceptualize disability within social and cultural frameworks, stressing the need for society to examine practices and mores that often do not fully accommodate individuals with a disability. Other researchers point to negligence on the part of scholars in the field of special education for failing to address racial overrepresentation in disability categories.[17] However, in their desire to maintain dominant practices within the field of special education, many traditional scholars either downplay or ignore issues of race.[18]

THE CATEGORY OF DISABILITY

At this juncture, it is important to discuss the categories of *disability* and, by extension, *disabled students*. Historically, within the field of education, disability has been understood through "the medical model." In brief, disability is perceived as a "problem" within an individual who is viewed as "broken" or "ill" and therefore in need of being "fixed" or "cured." Thus, disabilities are seen as the predicament of the individual in the biological domain (ignoring

social or cultural influences). In the medical model, students designated disabled are often taught in separate classes, segregated and grouped together with "others" with the same or similar labels. While the psychological and social shame of being "othered"—as a devalued member of the community in comparison to nondisabled people—appears of little concern to traditional special educators, it is of great concern to those who claim to have become *disabled* by unjust practices that have become systemic and standardized.[19]

Greatly influenced by the civil rights organizations forged by African Americans in the 1950s and 1960s, people with disabilities organized their own political movement. Disability rights activists have made significant strides toward gaining access to schools, services, jobs, and housing, which are all viewed as opportunities for improving the quality of their lives.[20] Simi Linton has written extensively about usually ignored but nonetheless pervasive societal practices that oppress people with disabilities. She pointedly declared that, "the enormous energy society expends in keeping people with disabilities sequestered in subordinate positions is matched by the academy's effort to justify that isolation and oppression."[21] Despite these barriers to full participation in society, the academic discipline of disability studies has evolved, thereby creating new and *political* understandings of disability. From this framework, disability is seen as interacting with social, cultural, historical, legal, and medical discourses, as well as further complicating factors such as race, ethnicity, gender, age, and class. As a result, the term disability has come to represent "a linchpin in a complex web of social ideals, institutional structures, and government policies."[22] Many people with disabilities, therefore, have claimed status of disability as a significant marker of their own individual identity, while adopting a "minority model" of their shared identity. The purpose of identifying as a minority is to unite together and, along with allies, influence social change leading to a more equitable society.[23]

The "social model" of disability, in contrast to the medical model, focuses on everyday societal practices that prevent people with disabilities from fully accessing all aspects of life, especially schooling; and several scholars in fields of special education *and* disability studies have criticized the damaging, taken-for-granted practices within the special educational field. For example, a typically unquestioned practice in the field is the seemingly perpetual expansion of disability categories. These categories, which then become reified as "natural" to many people, can be otherwise viewed as socially constructed descriptions, a response to particular needs determined by powerful, dominant ideologies and institutions within society.[24] In most education textbooks, several categories of disability are commonly referred to, in a self-explanatory manner, as "high incidence." The same categories are also often described as "soft," implying a less tangible nature—perhaps because of their apparent "invisibility"—in comparison to physical or sensory disabilities. The use of high incidence "soft" categories, we argue, serves to

uphold institutionalized segregation on the grounds of disability, while in fact, perpetuating separation based on race.

CONSTRUCTED DISABILITIES

Given how the field of disability studies seeks to question assumptions about *all* categories of disability, it can be argued for the purpose of exploring the nexus of race and disability, that *certain* categories may be considered more problematic than others. Since the early 1970s the OCR has reported the persistent overrepresentation of minority children in categories requiring specialized clinical judgment.[25] Racial disparities are highly pronounced in the specific categories of Mental Retardation (MR), Emotional Disturbance (ED), and Learning Disabilities (LD).[26] Thus, "invisible" disabilities involving the capacity to "think" or learn and/or those of a social nature, i.e., those pertaining to cognitive/academic development and behavior, are consistently ascribed to racial and linguistic minority students.[27] In contrast, less subjective categories such as blindness or deafness are proportional to racial and ethnic representation within the overall population.[28] This indicates that overrepresentation is much more pronounced in more subjective disability areas than in diagnoses that are more obvious or objectively determined. The most recent government reports find that while African Americans constitute 14.8 percent of the population, they represent 20.2 percent of all students in special education classes.[29] African American students remain three times as likely to be labeled as MR as white students, two times as likely to be labeled ED, as well as almost one and a half times as likely to be LD.[30] In fact, African American students remain the most overrepresented of all groups in nine out of thirteen disability categories nationwide, a fact that significantly influences the restrictiveness of their school environment.[31]

It is important to note that the original legislation of The Education of All Handicapped Children Act (1975) contained the clause of Least Restrictive Environment (LRE), which allows students several *options* for placements, from those located separate from their nondisabled peers to those located in the general education classroom.[32] However, an unintended result of this option has been a series of mechanisms by which three-quarters of students have been placed in classes that separate them from nondisabled peers.[33] Anastasios Karagiannis questions whether soft disabilities in schools assist or confine children, by calling attention to the correlation between students labeled disabled and the rates of their subsequent imprisonment. He charges that schools are "places of pre incarceration for disadvantaged students" that foster dependence on "ossified organizations whose practical engagement ends with labels."[34]

In chronicling the discursive construction of learning disability, D. Kim Reid and Jan Valle argue that the discourses of science, medicine, and psychology constitute the roots of special education.[35] They pointed out that these discourses "become apparent as we consider the process by which once

ordinary children struggling in school become *disabled students.*"[36] Reid and
Valle highlight typical language used to describe students who experience
difficulties in school, including phrases such as "areas of deficiency,"
"discrepancy between ability and achievement," "visual and auditory
processing deficits," "erratic performance," and "inattentive behaviors."[37]
Disability, therefore, is equated with a missing element, and that element can
be detected (and defined) by multiple clinical procedures such as observation,
testing, and evaluation, resulting in students becoming permanently labeled
disabled, and contained in a test-warranted "cocoon of professional help."[38]
Thus, clinical judgment prevails in the conceptualizing and subsequent
operationalizing of "soft" disabilities in schools. Like LD, the categories of
ED and MR are subject to a great deal of interpretation. In light of this, we
believe it worthwhile to include federal definitions of these disabilities to help
demonstrate their socially constructed nature.

> *Mental retardation* means significantly subaverage general intellectual functioning,
> existing concurrently with deficits in adaptive behavior and manifested during the
> developmental period, that adversely affect a child's educational performance.[39]

In the current federal definition of Mental Retardation (MR), it is
interesting to note that there is no explicit mention of IQ. The definition
includes the difficulty experienced by an individual in adapting to the demands
of various environments during development (currently considered up to age
18, formerly 16), yet a level of subjectivity is involved—in defining
"significant," "subaverage," and "general"—because these are concepts
relevant to, and contextualized within, a specific culture and history.[40] The
federal definition is largely culled from that generated by Richard Heber of the
American Association on Mental Deficiency (AAMD) in 1961 in which he
claimed "subaverage intellectual functioning" was considered to be one or
more standard deviations below the mean; an IQ score of 85 or below.[41]
However, in 1973 MR was redefined, changing "subaverage intelligence" to an
IQ of 70, effectively reducing the "retarded" population from 16 to 2
percent, arguably saving social and educational agencies money, and limiting
their responsibility for legally providing services to individuals labeled MR.[42]
Such official changes paradoxically denote an arbitrariness in relation to
disability, illuminating how definitions shift according to the needs of those
doing the defining. At the same time, various social and political
organizations have generated their own definitions of disability. For example,
in 1992 the American Association on Mental Retardation (AAMR) created a
definition emphasizing a multi-dimensional understanding, in contrast to the
medical and federal classifications that traditionally cast MR within a
framework of incompetence.[43]

Among official categories, MR remains most likely to be assigned to
African American male students. Donald Oswald, Martha Coutinho, and Al
Best concur that while "increased poverty is associated with increased risk of

disability," there is still a "systematic bias" involved in identifying African American males as MR, while whites with a similar ability profile receive the (arguably) more palatable label of LD.[44] Racial bias is suggested in national statistics that show the likelihood of black males being labeled MR to be between four and five times that of whites in Connecticut, Mississippi, North Carolina, South Carolina, and Nebraska.[45] Furthermore, African American students who attend school in wealthier communities are more likely to be labeled MR and assigned to segregated classes than those attending predominantly African American, low-income schools, highlighting a complicating factor associated with socioeconomic class.[46]

> *Emotional disturbance* means a condition exhibiting one or more of the following characteristics over a long period of time and to a marked degree that adversely affects a child's educational performance: (a) An inability to learn that cannot be explained by intellectual, sensory, or health factors; (b) An inability to build or maintain satisfactory interpersonal relationships with peers and teachers; (c) Inappropriate types of behavior or feelings under normal circumstances; (d) A general pervasive mood of unhappiness or depression; (e) A tendency to develop physical symptoms or fears associated with personal or school problems. The term includes schizophrenia. The term does not apply to children who are socially maladjusted, unless it is determined that they have an emotional disturbance.[47]

Terms once used such as "delinquent," and "culturally deprived" have been shed in recent years in favor of the term "emotionally disturbed."[48] Once again, the onus is squarely on what students *cannot* do: an inability to perform academic tasks, partake in adequate social interactions, live up to behavioral norms, enjoy or feel comfortable in school. What is lacking in the federal definition is any recognition that schooling is highly interactive and significantly contextualized, and how these factors may influence student behavior and academic performance. In addition, notions such as "*inappropriate* behavior or feelings" and "*normal* circumstances" (italics added) masks the definers' ability to determine universally assumed appropriateness and normalcy. Indeed, scholars such as James Banks, Geneva Gay, Gloria Ladson-Billings, and Lisa Delpit have long drawn attention to how nonblacks may mistakenly perceive demonstrations of African American students' behavior as threatening, whereas such behavior accurately represents culturally appropriate norms within black communities.[49]

Second to MR, African American students are labeled ED with over twice the frequency of white students. However, while discussions about cultural differences in behavior and social interactions have featured prominently in multicultural literature, they have been significantly downplayed in traditional journals of special education.[50] Failure to explore different behaviors, vocabulary, perceptions, and expectations customarily posit students labeled ED as lacking in relation to unquestioned cultural and behavioral norms of the mainstream society. Citing a 90 percent white teaching force educating a multicultural population that includes 40 percent minority students, Delpit

also calls attention to racial and ethnic imbalance in the power structures of classrooms.[51]

In addition, Thomas Parrish calls attention to financial incentives for overidentifying students of color as disabled. Because special education is a complex bureaucratic system operated by middle-class professionals, poor or working-class family members are often too overwhelmed to negotiate its intricacies or challenge decisions made by "experts." Students of color, therefore, may have "fewer advocates to protect them" from being subjected to the practice of labeling.[52] In another study by Parrish and Christine Hikido examining the connections among poverty, minority students, and state funding, the authors conclude that there is "a much stronger relationship between special education and race than between special education and poverty."[53] Such findings continue to be extremely disturbing, strongly suggesting that classification rates for ED— for black students over twice the rate for white students in twenty nine states—are implicated in the high dropout rates for African American youth.[54]

> *Specific Learning Disability* means a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, that may manifest itself in an imperfect ability to listen, think, speak, read, write, spell, or to do mathematical calculations. The term includes such conditions as perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia, and developmental aphasia. The term does not include learning problems that are primarily the result of visual, hearing, or motor disabilities; of mental retardation; of emotional disturbance; or of environmental, cultural, or economic disadvantage.[55]

The term "Learning Disabled" (LD), coined in 1962 by Samuel Kirk, is problematic for many reasons.[56] The meaning of LD has always been contested by different interest groups including governmental agencies, educational researchers, and professional organizations, all having proposed alternative definitions. Traditionally, researchers in the field of special education have argued about particular orientations to the study of LD—all deficit-based, including theories of perceptual motor, language, neuropsychological, and metacognitive disabilities. In contrast, more recent constructivist-oriented researchers have come to place increased value on the social context as well as interests of the child. It is abundantly clear, therefore, that the label LD signifies different things to different people, and continues to shift with ongoing research.

The federal definition casts a broad net over "imperfect abilit[ies]" and lists numerous skills that are thought to form the core of literate school learning. Tasks that have become a normalized part of our culture, such as reading and writing at an expected level, at a certain rate, and at a given age, can also be viewed as social demands. Hervé Varenne and Ray McDermott argue that, "without schools, [there can be] no learning disabilities," calling attention to "the category of LD as constructed in accordance with the needs of public education."[57] Interestingly, the federal definition also contains a

caveat of what LD is *not*, including "environmental, cultural, or economic disadvantage," defining the disability without recognizing any existing social inequalities that may impinge upon academic performance. To complicate matters further, each state can add further criteria to the federal definition, but cannot subtract any clauses. For example, in New York, it was added that, "a student who exhibits a discrepancy of 50 percent or more between expected achievement and actual achievement determined on an individual basis shall be deemed to have a learning disability."[58] Once again, the "expected" levels of achievement are subject to determination by local educational authorities, and evaluating students according to mathematical formulas for academic performance is a highly subjective process (although it is viewed otherwise by those who employ these methods).

In addition to MR and ED, the category of LD is also deeply implicated in the tangled issues of race, disability, and special education. Emerging as a label during the 1960s, students with a learning disability were characterized as having average or above average intelligence, specific rather than generalized deficits, and a white, middle-class cultural/familial background. The category of LD originally became associated with white students to such a degree that students with similar levels of academic achievement were given different labels based on their racial, ethnic, and class backgrounds.[59] In fact, in the first ten years following the emergence of the category (1963–1973), the vast majority of students labeled LD were white, middle-class males.[60] As a result, specific categories within special education became as "racially segregated" as general education. While white students were overrepresented in the categories of LD and Gifted, African American students were overrepresented in the MR and ED, and underrepresented in Gifted—even if they achieved comparable test scores to whites.[61] However, over the last three decades, the label of LD has become increasingly applied to students of color.[62]

An exception to overrepresentation of minorities is the under-representation of Asian American students with disabilities.[63] Stereotyped as the "model minority," and often academically outperforming middle class white students, they are far less likely to be labeled in subjective categories of MR, ED, or LD than any other minority group. In states with large Hispanic or Native American populations, students from these groups are also more likely to be overrepresented in special education than their white counterparts.[64] Data on Hispanic students are complicated by the fact that they tend to be underidentified in elementary school, but overidentified as learning disabled in high school.[65] Furthermore, students who are "English Language Learners" (ELL) or labeled "Limited in English Proficiency" (LEP) are overrepresented in special education, especially in the upper grades.[66] All of this information suggests that students from racial, ethnic, and linguistic minority groups, except of Asian origin, are more likely to be identified as needing special education services, and by receiving them, increase their risk of educational segregation according to ability and/or race.

As we have seen, the clinical judgment involved in labeling students as disabled in the "soft" categories, while claiming authority from scientific, medical, and psychological discourses, is actually far from "objective." What compounds the problem of overrepresentation of students color in disability categories, however, is another round of subjective judgments: once labeled, where should the student be placed? Indeed, there is a marked correlation between the type of disability label and the restrictiveness of the placement. The U.S. Department of Education recently reported statistics about access to the general education environment for students labeled MR, ED, and LD. Figures for students spending "greater than 21 percent [of] time outside of regular education classroom during the 1997–98 school year revealed that [this was the case for] 82 percent of students labeled MR, 70 percent of students labeled ED, and 56 percent of students labeled LD.[67] Once labeled disabled, there is an increased likelihood that minority students will be educated in more restrictive placements in comparison to their white peers sharing the same label, leading Fierros and Conroy to conclude that "increased time in the regular education classroom is largely attributable to a special needs student's race."[68]

INCREASED ACCESS TO SCHOOLS: SEGREGATION MAINTAINED

The *Brown* decision was rooted in the Fourteenth Amendment of the U.S. Constitution: "No state shall make or enforce any law which shall . . . deny to any person within its jurisdiction the equal protection of the laws."[69] In other words, "If states have undertaken to provide an education to its citizenry, then they must do so for all its citizens."[70] This sharply contrasted with educational policies regarding students with disabilities, since "laws in most states allowed school districts to refuse to enroll any student they considered 'uneducable,' a term generally defined by local school administrators."[71] Parents and advocates for children with disabilities saw the wider implications of *Brown*, namely, the need to have the rights of disabled students also recognized within the law. In 1975 their combined efforts resulted in Congress passing the hallmark legislation of Public Law (P.L.) 94-142 mandating a "free and appropriate education for all handicapped children" (FAPE).[72] This law guaranteed an educational evaluation for each child having (or suspected of having) a disability. To many disability advocates, the Education of All Handicapped Children Act (1975) was as significant as the Supreme Court *Brown* decision. The law specified that *all* students, regardless of their disability, were entitled to a public education that had hitherto not been guaranteed by federal legislation.[73]

As doors opened for students with moderate and severe disabilities, public school officials were also given the power to determine which students were suspected of having "mild" disabilities. If a suspected disability was confirmed, the evaluating team was charged with considering the Least Restrictive Environment (LRE) in which the child could be educated.[74] Thus, the

placement of students has always been based on a continuum of services, including general education, separate classes or schools, home, or a hospital setting for all or part of the day. Although P.L. 94-142 is viewed as enormously successful in giving students with disabilities access to public education, the preponderance of decisions that place students in separate settings has created a largely segregated educational system.

To many disability rights advocates and activists, LRE is a loophole that allows educational institutions to maintain the segregation of people with disabilities in schools, and by extension, in society at large.[75] To other scholars and parents, LRE is a necessary protection that ensures flexibility and individualized placement for students who are often overlooked or overwhelmed in general education.[76] By all accounts, it can be said that, "there is a persistent tension between the requirements of appropriate education and the least restrictive environment."[77]

Placement options outlined in P.L. 94-142 were soon criticized by educator Maynard Reynolds who viewed them as *too restrictive* and counterproductive given the intent of the law.[78] Melvyn Semmel, Jay Gottleib, and Nancy Robinson declared that there was no "conclusive body of evidence which confirms that special education services appreciably enhance the academic and/or social accomplishments of handicapped children beyond what can be expected without special education."[79] On a similar note, William and Susan Stainback asserted that "the instructional needs of students do not warrant the operation of a dual system."[80] Challenging the notion of two "types" of students, they called for a merger of both systems that would unite and support all educators. By the mid 1980s, Reynolds, Margaret Wang, and Herbert Warburg noticed the growing enrollment of minority students in special education and "the continuation of segregation of many students in disjointed programs."[81] In 1985, Madeline Will, Assistant Secretary for the Office of Special Education and Rehabilitation Services of the U.S. Department of Education, began speaking about the need for shared responsibility toward students with mild disabilities.[82] It was under her influence that the Regular Education Initiative (REI) began.

TOWARD INTEGRATION:
THE BRIEF HISTORY OF THE INCLUSION MOVEMENT

The REI proposed the collaboration between general and special educators. A primary goal was to more fully include students with mild to moderate disabilities in general education. Public school officials were charged with having "created however unwittingly, barriers" to the successful education of disabled students.[83] Alan Gartner and Dorothy Lipsky examined these barriers and described "myriad faults" within the special education system, including the provision of financial incentives for local education authorities to place and maintain students in more restrictive environments.[84] While such financial incentives appeared to counteract the spirit of the

original legislation, they helped explain why "overall, 74 percent of special education students are in pull-out or separate programs."[85] Mara Sapon-Shevin also expressed concern over the omission of statistics in government data on students with disabilities placed in segregated settings. It appeared that some children (those with disabilities) were not worth "officially" counting.[86]

The REI had limited success. It was viewed by many as a unilateral initiative organized by special education advocates who had not sufficiently considered the needs and perspectives of those responsible for general education. Lawrence Lieberman described this *faux pas* as tantamount to hosting "a wedding in which we, as special educators, have forgotten to invite the bride."[87] Despite the fact that the REI was perceived by critics as non-specific, illogical, flawed, and harmful to the needs of students with disabilities, it obviously hit a nerve.[88] In many ways REI heralded the beginning of a significant change for its supporters and detractors alike. In the state of Vermont, for example, extensive legislation was passed in 1990 to ensure maximum emphasis on placing and supporting students with disabilities in general education, with an emphasis on the school principal's responsibility to *all* students.[89] In Kentucky, Colorado, and Pennsylvania changes were made at state and local levels.[90] It was in this hopeful climate that Reynolds wrote that, "the history of special education delivery systems can be summarized in two words: progressive inclusion."[91]

As a result of REI, the debate over the best setting for educating students with disabilities intensified. The practice of *mainstreaming* had been employed since 1975, but was usually only "applicable to those students who were considered to be most like normal."[92] Mainstreaming was considered only for disabled students who could cope independently with the academic and social demands of the general education classroom. In contrast, *inclusion* later signified that a student with a disability could benefit academically and socially from the general education classroom, even if their needs were different from those of other students. It should be noted that *mainstreaming* and *inclusion* are often used interchangeably in the educational literature; however, they differ significantly in terms of definition and philosophy.

The Reauthorization of P.L. 94-142 in 1990 as P.L. 101-476, or the Individuals with Disabilities Education Act (IDEA), increased the general public's awareness of people with disabilities and their need to have increased access to all aspects of society. Although the REI stressed inclusion for some students with disabilities, the concept of *full inclusion* was now gaining more attention. Wayne Sailor characterized full inclusion as the attendance of students with disabilities in their home-based schools. He further defined inclusion as a zero-reject policy, where a "natural proportion" of disabled and nondisabled students would be taught together, in age-appropriate placements, with no self-contained classes, and with special education supports provided in integrated learning environments.[93] However, Richard Villa and Jacqueline Thousand argued that inclusion was not just a "service placement," but rather

"a way of life, a way of living together . . . a belief that each individual is valued and does belong."[94]

In response to the widespread influence of and controversy over inclusion, many professional educational organizations and child advocacy groups issued official statements that varied widely in their support for inclusion. For example, in 1993 the Learning Disabilities Association (LDA) declared that, "the placement of ALL children with disabilities in the regular classroom is as great a violation of IDEA as is the placement of ALL children in separate classrooms on the basis or type of their disability."[95] In the same year, the National Joint Committee on Learning Disabilities agreed that full inclusion "violates the rights of parents and students with disabilities as mandated by IDEA."[96] The National Parent Network on Disabilities and several other organizations supported a moderate stance of "fully supported inclusion" for most disabled children, whereas the Council for Exceptional Children and the Council for Learning Disabilities called for the maintenance of the current continuum of services.[97] Several organizations, including the Association for Persons with Severe Handicaps and the United Cerebral Palsy Association, supported full inclusion.[98]

At the same time, reports surfaced in the media about poor academic and social outcomes for students in the special education system. *U.S. News & World Report* pointed to the overrepresentation of minority students in special education classes, commenting "nearly 40 years after *Brown v. Board of Education,* . . . Americans continue to pay for and send their children to classrooms that are often separate and unequal."[99] On television, the *Merrow Report* asked, "What's So Special about Special Education?" and critics talked about special education as "welfare annexes" that led to "dead ends for many children."[100] A documentary film, *Educating Peter,* that chronicled the trials and ultimate triumph of an "included" 10-year-old boy with Down Syndrome, won an Academy Award for Best Achievement in Documentary Short Subjects in 1992.[101]

Meanwhile in the educational literature, inclusion was joined with issues of social justice and became virtually synonymous with special education reform.[102] Not surprisingly, scholars and educators who were satisfied with the status quo in special education felt that the foundations on which they stood were under attack. Douglas and Lynn Fuchs wrote "the reformist impulse has been radicalized" and "the field's rhetoric has become increasingly strident and its perspective increasingly insular and disassociated with general education concerns."[103] The authors also charged supporters of inclusion with possessing "unjustified optimism," and "doubt[ed] that most teachers will tolerate students more difficult to teach than they currently have."[104] In the *Illusion of Full Inclusion* (1995), a book of essays edited by Daniel Hallahan and James Kauffman, offered a systematic critique of inclusive practices and the professionals who supported them.[105] Citing the success of separate programs for students who were deaf and blind, the editors forcefully maintained that a continuation of current practices was appropriate.[106] In turn, Ellen

Brantlinger analyzed the traditionalists' work, and pointed out that "while marking inclusionists as ideological, traditionalists assume—or attempt to create the impression—that their work is non-ideological."[107] Brantlinger claimed that by not recognizing their own ideological positioning, traditionalists were responsible for "reifying disability and naturalizing special services."[108]

Coinciding with the Reauthorization of IDEA in 1997 that stressed increased access to the general education curriculum, Lipsky and Gartner's *Inclusion and School Reform* offered a comprehensive overview of inclusion in relation to shifting policies and practices within special education.[109] Interestingly, the field of gifted education became increasingly implicated in the debate, as proponents claimed all students could and should benefit from instructional enrichment traditionally earmarked for "gifted" students.[110] It was also argued that integration of gifted students would no longer "perpetuate, even exacerbate, inequities in our society."[111] In a commentary on the field of special education at that time, Kauffman stated that, "Inclusion has become virtually meaningless, a catch-word used to give a patina of legitimacy to whatever program people are trying to sell or defend."[112]

Kauffman's comments symbolized the extent to which the field of special education was split over the issue of inclusion. A coalition of fifteen prominent special education scholars succinctly outlined two broad and conflicting positions in an article titled "Bridging the Special Education Divide."[113] On the one hand, traditionalists favored a policy of incremental improvement, believed that the current model of special education was sound, and that disability was best conceptualized within a medical model. They also suggested that enhanced academic and social performance should be sought, expected outcomes should be tied to post-school adaptive functioning, the existing knowledge base and theories were promising, and, there remained a need to introduce scientific rigor to teacher preparation programs. On the other hand, the reconceptualists argued that special education was a flawed system, notions of disability should be recast within a social model, current structures were limiting and denied access to people with disabilities, more emphasis should be placed on human diversity and less on labels and categorizations, and, that all educators should focus on an ethics of caring for all students. Although the coalition of special education scholars ended on a cautiously optimistic note, each ideological position is so differently structured that reconciliation appears unlikely. As Peter Paul and Marjorie Ward have noted, both groups have paradigmatically conflicting stances.[114] The former is interested in asking the question, "Does inclusion work?"; the latter wants to know, "What needs to be done to make inclusion work?"

Both *Brown v. Board of Education* (1954) and the Individuals with Disabilities Education Act are widely considered two of the most important milestones in American education in the 20th century. Both of these measures sought to expand educational opportunities to once excluded groups

of students. While it must be acknowledged that both *Brown* and IDEA have significantly changed the educational landscape, we must also reflect upon the unfulfilled promise of each. Recent research has revealed that white students are more segregated from children of color than ever before, and the same is very likely the case for African Americans.[115] In a similar way, despite the increase of inclusive classes for students with disabilities in the 1990s, the standardized testing movement, along with entrenched traditional separatist positions taken by leaders in the field of special education, created a backlash against the integration of students with varying levels of ability.[116] Many school districts continue to have few, if any, inclusive programs for students with disabilities.

This contemporary reality raises two historical questions: Why did supporters of *Brown* not recognize how the assigned status of "disability" could serve as a mechanism for resegregating students of color in otherwise desegregated schools? And, why did special education fail to take into account the intersection of race and disability and, thus undermine the goals of the *Brown* decision? These questions, which we purposely raise at the fiftieth anniversary of *Brown* and the thirtieth anniversary of IDEA, suggest that the time is ripe to contemplate how ideologies about race and ability have remained intertwined throughout the history of American public schooling.

While we do not wish to posit the lived experiences of African Americans and people with disabilities as similar, we would like to call attention to ways in which similar responses of schooling practices, reflecting the values of society at large, have served to inhibit the actual integration of African American students and the inclusion of children with disabilities into general public education. For example, immediately after the *Brown* decision, local public school authorities provided additional financial resources to existing black schools; and after IDEA was passed, funds were allocated to build separate schools for severely disabled children.[117] Loopholes in the legislation were used to subvert educational change. *Brown II* (1995) contained the phrase "with all deliberate speed," which was interpreted by many southern officials as "move gradually"; IDEA provided for a continuum of services that was construed by many as a call for separate placement for disabled students.[118] Both laws precipitated an increase in testing, tracking, and academic labeling predicated on culturally defined notions of "intelligence."[119] Long-standing institutionalized racism and ableism continued to be evident as reflected in the *pace* with which actual change took place.[120] After both *Brown* and IDEA, teachers' expectations shifted with regard to their more culturally diverse and variously abled students and generated responses that negatively impacted many children. Some teachers and administrators feared "tipping the scales" toward classes with student populations that would be considered "too African American" or "too disabled."[121] Teachers often complained that they were not adequately prepared for impending changes, and some became angry over their predicament.[122] African American or disabled students were considered unwanted elements, if not potential

criminals.[123] Finally, while many African American teachers lost their jobs in the immediate post–*Brown* era, special educators have expressed fear that their role would be diminished or eclipsed in the move toward inclusive classrooms.[124]

CONCLUSION

In this essay we explored the problematic nexus of race and disability in American schooling practices, by contemplating the significance of and relationship between *Brown v. the Board of Education* (1954) and the Education of All Handicapped Children Act (1975). We examined the growth of special education as a response to *Brown,* highlighting the increase of subjective categories such as mental retardation, emotional disturbance, and learning disability that have resulted in an overrepresentation of African American students (and other children of color) in segregated programs and classrooms. In addition, we charted the growth of, and resistance to the inclusion movement, purposefully designed to integrate students with disabilities into the general classroom. Finally, we illustrated methods and tactics that have been used to prevent the full integration of African American students and children with disabilities, concluding that they were not separate and distinct issues, but rather part of the same discourse on understanding and accepting human difference in classrooms.

In conclusion, we return to the ideas expressed by Lillian Smith in her letter to the *New York Times* in 1954. Her sentiments eloquently express the need to welcome all children into "mainstream" American classrooms. First *Brown,* and then IDEA, were legal remedies designed to end the segregation of children in schools. Historically, each was constructed as a single issue and often pursued independently. However, if we view race, disability, linguistic diversity, and social class in terms of their intersectionality, we can start to see how the movements for desegregation and inclusion were (and are) intimately connected, perhaps even interdependent. As long as there continues to be a dual system of general and special education, one will advance at the expense of the other. However, if we define inclusion as a broad-based reform effort to make school and classrooms accessible and responsive to *all* students, this may be one way to finally fulfill the promise of *Brown.*

NOTES

[1]Lillian Smith, Letter to the Editor, *New York Times,* 6 June 1954, 10E.

[2]Waldo E. Martin, Brown v. Board of Education: *A Brief History with Documents* (Berkeley, CA, 1998), 219.

[3]James T. Patterson, Brown v. Board of Education: *A Civil Rights Milestone and its Troubled Journey* (New York, 2001), 100; Bettye Collier-Thomas and V. P. Franklin, *My Soul is a Witness: A Chronology of the Civil Rights Era, 1954–1965* (New York, 1999), 69.

[4]Patterson, *Brown v. Board of Education,* 100.

[5]Beth A. Ferri and David J. Connor, "Tools of Exclusion: Race, Ability, and (Re)segregated Education," *Teachers College Record* (forthcoming); James G. Carrier, *Learning Disability: Social Class and the Construction of Inequality in American Education* (New York, 1986), 89.

[6]"Negroes Make-Up 68 p.c. of District Enrollment," *Southern School News,* 16 December 1956.

[7]*Diana v. California State Board of Education,* No C-70-37, RFP (N.D. Cal., 1970); *Larry P. v. Riles,* 495 F. Supp. 926 (N.D. Cal. 1979).

[8]V. P. Franklin, "Black Social Scientists and the Mental Testing Movement, 1920–1940," in *Black Psychology,* Third Edition, ed. Reginald L. Jones (Berkeley, CA, 1991), 207–24.

[9]Steven Selden, *Inheriting Shame: The Story of Eugenics and Racism in America,* (New York, 1999), 95–96; Stephen Jay Gould, *The Mismeasure of Man* (New York, 1996), 385–89; Nancy Lesko, *Act Your Age! A Cultural Construction of Adolescence* (New York, 2001), 22.

[10]Thomas Parrish, "Racial Disparities in the Identification, Funding and Provisions of Special Education," in *Racial Inequity in Special Education,* ed. Daniel J. Losen and Gary Orfield (Cambridge, MA, 2002), 15.

[11]See http://www.cnn.com/2003/EDUCATION/08/27/spri.sch.teacher.survey.ap/

[12]Lisa Delpit, *Other People's Children: Cultural Conflict in the Classroom* (New York, 1995) 167–183; bell hooks, *Black Looks: Race and Representation* (Boston, MA, 1992), 1; James A. Banks, "Multicultural Education in the New Century," *School Administrator* 56 (May 1999): 8–10.

[13]Ellen Brantlinger, "Using Ideology: Cases of Nonrecognition of the Politics of Research and Practice in Special Education," *Review of Educational Research 67* (Winter 1997): 425–59; Ellen Brantlinger, *Dividing Classes: How the Middle Class Negotiates and Rationalizes School Advantage* (New York, 2003); Hervé Varenne and Ray McDermott, *Successful Failure: The Schools America Builds* (Boulder, CO, 1998).

[14]Varenne and McDermott, *Successful Failure,* 38.

[15]See, Theresa Glennon's "Evaluating the Office for Civil Rights' Minority and Special Education Project," in Losen and Orfield, *Racial Inequity in Special Education,* 195.

[16]Brantlinger, "Using Ideology"; Lous Heshusius, "The Newtonian Mechanistic Paradigm, Special Education, and the Contours of Alternatives," *Journal of Learning Disabilities* 22 (August–September 1989): 402–15; and "Modes of Consciousness and Self in Learning Disabilities Research: Considering Past and Future" in *Cognitive Approaches to Learning Disabilities,* 3rd ed., ed. D. Kim Reid, Wayne P. Hresko, and H. Lee Swanson (Austin, TX, 1996), 617–51; Curt Dudley-Marling, "Reconceptualizing Learning Disabilities by Reconceptualizing Education," in *New Ways of Looking at Learning Disabilities,* ed. Lou Denti and Patricia Tefft-Cousin (Denver, CO, 2001), 5–17; Bridgie Alexis Ford and Helen Bessent Byrd, "Reconceptualizing the Learning Disabilities Paradigm: Multicultural Imperatives," in *New Ways of Looking at Learning Disabilities,* 19–39; Cheryl Ames, "A Personal Journey: Changing Concepts of Learning and Disability," in ibid., 41–55.

[17]Ellen Brantlinger, "Confounding the Needs and Confronting the Norm," *Journal of Learning Disabilities* 37 (November–December 2004): 490–99; D. Kim Reid and Jan W. Valle, "The Discursive Practice of Learning Disability: Implication for Instruction and Parent School Relations," *Journal of Learning Disabilities* 37 (November-December 2004): 466–81; David J. Connor, "Studying Disability and Disability Studies: Shifting Paradigms of LD—a Synthesis of Responses to Reid and Valle," *Journal of Learning Disabilities* (forthcoming); Dorothy K. Lipsky and Alan Gartner, *Inclusion and School Reform: Transforming America's Classrooms,* (Baltimore, MD, 1997); Thomas Skrtic, *Behind Special Education: A Critical Analysis of Professional Culture and School Organization,* (Boulder, CO, 1991).

[18]James M. Kauffman and Daniel P. Hallahan, ed. *The Illusion of Full Inclusion: A Comprehensive Critique of a Current Special Education Bandwagon* (Austin, TX, 1995); Douglas Fuchs and Lynn S. Fuchs, "Inclusive Schools Movement and the Radicalization of Special Education Reform," in ibid., 213; Virginia W. Berninger, et al., "School Evolution: Scientist-Practitioner Educators Creating Optimal Learning Environments for All Students," *Journal of Learning Disabilities* 37 (November-December 2004): 500–508.

[19]Lynn Pelkey, "In the LD Bubble," in *Learning Disabilities and Life Stories,* ed. Pano Rodis, et al., (Needham Heights, MA, 2001), 17; Aaron Piziali, "Revolution," in ibid., 29; Nelson Vee, "Riding the Drug and Alcohol Train," in ibid., 134.

[20]Doris Zames Fleischer and Frieda Zames, *The Disabilities Rights Movement: From Charity to Confrontation* (Philadelphia, PA, 2001), 49–70; Marta Russell, *Beyond Ramps: Disability at The End of The Social Contract* (Monroe, ME, 1998) 8–11.

[21]Simi Linton, *Claiming Disability,* (New York, 1998), 3.

[22]Ibid., 10.

[23]See Paul K. Longmore and Lauri Umansky, ed. *The New Disability History: American Perspectives* (New York, 2001); Paul K. Longmore, *Why I Burned My Book and Other Essays on Disability* (Philadelphia, PA, 2003).

[24]Brantlinger, "Using ideology," 425–59; Scot Danforth, "What Happens When 'Bad' Kids Become a Medical Problem?: A Historical Review of the Critical Literature on Attention Deficit Hyperactivity Disorder," paper presented at Second City Conference on Disability Studies in Education on Education, Social Action, and the Politics of Disability, at National-St. Louis University, Chicago, June 14–15, 2002; Beth A. Ferri, et al., "Mediating Discourses of Disability: Teachers with LD Revising the Script," *Journal of Learning Disabilities* 38 (January–February 2005): 62–78; Susan L. Gabel, "What is Disability Studies?"; paper presented at the American Education Research Association, Seattle, WA, April 10–14, 2001; Reid and Valle, "The Discursive Practice of Learning Disability"; Linda Ware, "Writing, Identity, and the Other: Dare we do Disabilities Studies?" *Journal of Teacher Education* 52 (March–April 2001): 107–23.

[25]Losen and Orfield, *Racial Inequity in Special Education,* xv.

[26]Parrish, "Racial Disparities," 22–23.

[27]Ibid.," 15–37; Alfredo J. Artiles, et al., "English-Language Learner Representation in Special Education in California Urban School Districts," in Losen and Orfield, *Racial Inequity in Special Education,* 117.

[28]National Alliance of African American School Educators, *Addressing Over-Representation of African American Students in Special Education* (Washington, DC, 2002), 6.

[29]Ibid., 39.

[30]Parrish, "Racial Disparities," 22–23.

[31]National Alliance of African American School Educators, *Addressing Over-Representation,* 6; Edward Garcia Fierros and James W. Conroy, "Double Jeopardy: An Exploration of Restrictiveness and Race in Special Education," in Losen and Orfield, *Racial Inequity in Special Education,* 39.

[32]"Least restrictive environment means that placement of students with disabilities in special classes, separate schools or other removal from the regular educational environment occurs only when the nature or the severity of the disability is such that even with the use of supplementary aids and services, education cannot be satisfactorily achieved. The placement of an individual student with a disability in the least restrictive environment shall: (1) provide the special education needed by the student; (2) provide for education of the student to the maximum extent appropriate to the needs of the student with other students who do not have disabilities; and (3) be as close as possible to the student's home." 20 United States Code (U.S.C.) Sec. 1412(a)(5) (A).

[33]Alan Gartner and Dorothy K. Lipsky, "Beyond Special Education: Toward a Quality System for All Students," *Harvard Education Review* 57 (November 1987): 367–95.

[34]Anastasios Karagiannis, "Soft Disability in Schools: Assisting or Confining at Risk Children and Youth?" *Journal of Educational Thought* 34 (August 2000): 113–34.

[35]Reid and Valle, "The Discursive Practice of Learning Disability."

[36]Ibid., 469.

[37]Ibid.

[38]Gary Thomas and Andrew Loxley, *Deconstructing Special Education and Constructing Inclusion* (Philadelphia, PA, 1999), 53.

[39]*Code of Federal Regulations,* Title 34, Section 300.7(c)(6)(i).

[40]From 1961 to 1973 it was previously considered up to only 16 years of age. http://www.cloudnet.com/~edrbsass/mrdefinitions2.htm.

[41]Ibid.

[42]Ibid.

[43]"Mental retardation refers to substantial limitations in present functioning. It is characterized by significantly subaverage intellectual functioning, existing concurrently with related limitations in two or more of the following applicable adaptive skill areas: Communication, self-care, home living, social skills, community use, self-direction, health and safety, functional academics, leisure and work. Mental retardation manifests before age 18. Significantly subaverage intellectual functioning means an IQ score of 70 to 75 or below on a standardized individual intelligence test. Related limitations refers to adaptive skill limitations that are related more to functional applications than other circumstances such as cultural diversity or sensory impairment." http://www.ericfacility.net/ericdigests/ed372593.html.

[44]Donald P. Oswald, et al., "Community and School Predictors of Overrepresentation of Minority Children in Special Education," in Losen and Orfield, *Racial Inequity in Special Education,* 1.

[45]Parrish, "Racial Disparities," 21–22.

[46]Fierros and Conroy, "Double Jeopardy," 49.

[47]Code of Federal Regulations, Title 34, Section 300.7(c)(4)(i).

[48]For "delinquent" see, Barry M. Franklin, "The First Crusade for Learning Disabilities: The Movement for the Education of Backward Children," in *The Foundations of School Subjects,* ed. Thomas Popkewitz (London, 1987), 197; for "educationally deprived," see James G. Carrier, *Learning Disability: Social Class and the Construction of Inequality in American Education,* (Westport, CT, 1986), 46.

[49]James A. Banks and Geneva Gay, *Culturally Responsive Teaching: Theory, Research, and Practice,* (New York, 2000); Gloria Ladson-Billings, *The Dreamkeepers: Successful Teachers of African American Children* (San Francisco, CA, 1994); Delpit, *Other People's Children.*

[50]Brantlinger, "Using Ideology," 425–59; Arturo J. Artiles, "The Dilemma of Difference: Enriching the Disproportionality Discourse with Theory and Context," *Journal of Special Education, 32* (Spring 1998): 32–36; Arturo J. Artiles, "The End of Innocence, Historiography, and Representation in the Discursive Practice of Learning Disabilities," *Journal of Learning Disabilities* 37 (November–December 2004): 550–55.

[51]Delpit, *Other People's Children,* 167–83.

[52]Parrish, "Racial Disparities," 32.

[53]Thomas Parrish and Christine S. Hikido, *Inequalities in Public School District Revenues* (NCES98-210) (Washington, 1998).

[54]David Osher, et al., "Schools Make a Difference: The Overrepresentation of African American Youth in Special Education and the Juvenile Justice System," in Losen and Orfield, *Racial Inequity in Special Education,* 97.

[55]Code of Federal Regulations, Title 34, Section 300.7(c)(6)(i).

[56]Samuel A. Kirk, *Educating Exceptional Children* (Boston, MA, 1962).

[57]Varenne and McDermott, *Successful Failure,* 143.

[58]*Regulations of the Commissioner of Education of New York State,* Part 200.1 (zz) (6) (Albany, 2000), 11.

[59]Christine E. Sleeter, "Why is There Learning Disabilities? A Critical Analysis of the Birth of the Field in Its Social Context," in *The Foundations of School Subjects,* ed. Thomas Popkewitz (London, 1987), 210.

[60]Ibid., 230.

[61]Losen and Orfield, *Racial Inequity in Special Education,* xvii.

[62]Parrish, "Racial Disparities," 21–22.

[63]Ibid., 21–27.

[64]Ibid.

[65]Artiles, et al., "English-Language Learner Representation," 129.

[66]Ibid., 130.

[67]Fierros and Conroy, "Double Jeopardy," 49.

[68]Ibid., 53.

[69]Fourteenth Amendment, U.S. Constitution, 1868.

[70]Mitchell L. Yell, et al., "The Legal History of Special Education: What a Long, Strange Trip It's Been," *Remedial and Special Education* 19 (July–August 1998): 219–28.

[71]Edwin W. Martin, Reed Martin, and Donna L. Terman, "The Legislative and Litigation History of Special Education," *Special Education for Students with Disabilities* 6 (Spring 1996): 25–39.

[72]P.L. 94-142.

[73]The Education of All Handicapped Children Act (1975), P.L. 94-142, became the Individuals with Disabilities Education Act (IDEA) in 1990, P. L. 101-476, and was subsequently reauthorized as Individuals with Disabilities Education Act Amendments, P.L. 105-17, in 1997.

[74]See endnote 32 for definition of LRE.

[75]See Lipsky and Gartner, *Inclusion and School Reform;* Simi Linton, *Claiming Disability.*

[76]See Kauffman and Hallahan, "Toward a Comprehensive Delivery System for Special Education," in *The Illusion of Full Inclusion,* 157–91; See Margaret N. Carr, "A Mother's Thoughts on Inclusion," in ibid., 263–67.

[77]Martin, et al., "The Legislative and Litigation History," 35.

[78]Maynard C. Reynolds, "An Historical Perspective: The Delivery of Special Education to Mildly Disabled and At-Risk Students," *Remedial and Special Education* 10 (November–December 1989): 7–11.

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[80]William Stainback and Susan Stainback, "A Rationale for the Merger of Special and Regular Education," *Exceptional Children* 50 (October 1984): 102–11.

[81]Margaret C. Wang, et al., "Rethinking Special Education," *Educational Leadership* 44 (September 1986): 26–31.

[82]Madeleine C. Will, "Educating Children with Learning Problems: A Shared Responsibility," *Exceptional Children* 52 (February 1986): 411–15.

[83]Ibid., 412.

[84]Gartner and Lipsky, *Beyond Special Education,* 367.

[85]Ibid., 374.

[86]Mara Sapon-Shevin, "The National Education Reports and Special Education: Implications for Students," *Exceptional Children* 53 (January 1987): 200–206.

[87]Lawrence M. Leiberman, "Special Education and Regular Education: A Merger Made in Heaven?" *Exceptional Children* 51 (November 1985): 513–16.

[88]James M. Kauffman, "The Regular Education Initiative as Reagan-Bush Education Policy: A Trickle Down Theory of Education of the Hard to Teach," *Journal of Special Education* 23 (Fall 1989) 256–78; Fuchs and Fuchs, "The Inclusive Schools Movement and The Radicalization of Special Education Reform," in Kauffman and Hallohan, *The Illusion of Full Inclusion,* 213–42.

[89]See Lipsky and Gartner, *Inclusion and School Reform,* 104–105; Richard R. Schattman and Jeff Benay, "Inclusive Practices Transform Special Education in the 1990s," *The School Administrator* 49 (February 1992): 8–12.

[90]Lipsky and Gartner, *Inclusion and School Reform,* 99–116.

[91]Reynolds, "An Historical Perspective," 7.

[92]Lipsky and Gartner, *Inclusion and School Reform,* 77.

[93]Wayne Sailor, "Special Education in the Restructured School," *Remedial and Special Education* 12 (November–December 1991): 8–22.

[94]Richard A. Villa and Jacqueline S. Thousand, *Creating an Inclusive School* (Alexandria, VA, 1995), 11.

[95]Lipsky and Gartner, *Inclusion and School Reform,* 175.

[96]National Joint Committee on Learning Disabilities, "A Reaction to Full Inclusion: A Reaffirmation of the Right of Students with Learning Disabilities to a Continuum of Services," *Journal of Learning Disabilities* 26 (November 1993): 594–96.

[97]Ibid.

[98]bid.

[99]Joseph P. Shapiro, et al., "Separate and Unequal," *U.S. News & World Report,* 13 December, 1993.

[100]Robert Merrow, *The Merrow Report* [Television Broadcast]; New York, Public Broadcasting Service, 12 May 1996.

[101]*Educating Peter* (video), 32 minutes. Home Box Office, New York, 1992.

[102]Linda Couture Gerrard, "Inclusive Education: An Issue of Social Justice," *Equity and Excellence in Education* 27 (April 1994), 58–67; Carol Christensen and Fazal Rizvi, eds., *Disability and the Dilemmas of Education and Justice* (Philadelphia, PA, 1996).

[103]Fuchs and Fuchs, "The Inclusive Schools Movement," 215–16.

[104]Sherman Dorn, et al., "A Historical Perspective of Special Education Reform," *Theory Into Practice* 35 (Winter 1996): 12–19.

[105]Kauffman and Hallahan, *The Illusion of Full Inclusion.*

[106]Michael Bina, "Mainstreaming, Schools For the Blind, and Full Inclusion: What Shall the Future of Education for Blind Children Be?" in ibid., 269–73; Harlan Lane, "The Education of Deaf Children: Drowning in the Mainstream and the Sidestream," in ibid., 275–87.

[107]Brantlinger, "Using Ideology," 436.

[108]Ibid., 440.

[109]Lipsky and Gartner, *Inclusion and School Reform.*

[110]Mara Sapon-Shevin, "Beyond Gifted Education: Building a Shared Agenda for School Reform," *Journal for the Education of the Gifted* 19 (Winter 1996): 194–214.

[111]James Borland, "Gifted Education and the Threat of Irrelevance," *Journal for the Education of the Gifted* 19 (Winter 1996): 129–47.

[112]James M. Kauffman, "Commentary: Today's Special Education and its Messages for Tomorrow," *Journal of Special Education* 32 (Winter 1999): 244–54.

[113]Jack E. Andrews, et al., "Bridging the Special Education Divide," *Remedial and Special Education* 21 (September–October 2000): 258–60, 267.

[114]Peter V. Paul and Marjorie E. Ward, "Inclusion Paradigms in Conflict," *Theory Into Practice* 35 (Winter 1996): 4–11.

[115]Peter H. Irons, *Jim Crow's Children: The Broken Promise of the* Brown *Decision* (New York, 2002).

[116]Kauffman, "Commentary: Today's Special Education," 244–54.

[117]See, for example, "One good by-product of the controversy [had] been the building of some excellent schools for Negroes in the South" in "Raps Supreme Court," *Southern School News,* December 1956; also see Gartner and Lispky, "Beyond Special Education," 385, about concerns of shifting students from separate buildings and departments into the general education setting.

[118]For example, "The high court showed profound wisdom in not setting a definite time limit . . . [directing] integration as soon as practical. That won't be anytime soon in many counties in the South. The public in general simply isn't ready for that monumental change," *Arkansas Gazette* from "What They Say," *Southern School News* 1 (June 1955): 5. See also the tenacious grip on LRE signifying separate facilities for many students in Kaufman and Hallahan, *The Illusion of Full Inclusion.*

[119]Ferri and Connor, "Discourses of Exclusion."

[120]"Ableism" is a term used in the disability rights movement and disability studies by researchers to describe prejudicial ways of thinking and acting toward people with disabilities. In other words, it denotes discrimination based on disability, just as racism denotes prejudice based on race, and sexism denotes gender-bias.

[121]For example, one official commented, "Everything is going so well in my school . . . but then we only have a few Negro students and they're just wonderful," in "D.C. Officials Answer Parents' Query: How Is It Working?" *Southern School News* 2 (March 1956): 8; also, an anonymous official stated, "If you get people with serious disabilities moving in for the services they can get, it's like Mexicans coming across the border . . .," in Tamara Lewin, "Where All the Doors Are Open for Disabled Students," *New York Times,* 28 December 1997.

[122]"Segregation Groups Went to Capital," *New York Times,* 13 March 1956; Deborah Baird, "Integrating Disabled Students," *Los Angeles Times,* 9 February 2002.

[123]"What They Say," *Southern School News* 2 (February 1956): 16; Peter Inson, *The [London] Times Educational Supplement,* 21 July 2000, 33.

[124]Katherine Garnett, *Thinking About Inclusion and Learning Disabilities: A Teacher's Guide* (Reston, 1996).