To Label or Not to Label:
The Special Education Question for African Americans

By Moniqueka E. Gold
& Heraldo Richards

Moniqueka E. Gold is a professor and chair of the Department of Educational Specialties in the College of Education at Austin Peay State University, Clarksville, Tennessee. Heraldo Richards is associate dean of the College of Education at Tennessee State University, Nashville, Tennessee.

Special Education was mandated for students with disabilities more than 30 years ago with the passage of P.L. 94-142 in 1975. This monumental legislation specified categories of disabilities based on physical challenges (e.g., deaf, blindness, etc.) as well as psychological and emotional disorders (e.g., learning disabilities and serious emotional disturbance). The premise was that categorical identification would allow for the development of individualized education programs to address students' disabilities; hence, students were labeled accordingly. Categorization in special education became, for all practical purposes, a labeling process.

Over the years, the benefits of categorically identifying and labeling students with disabilities have been debated on many grounds, particularly when it comes to labeling African-American children who many argue are over-labeled or disproportionately represented in selected categories such as learning disabilities (Artiles & Trent, 1994). In this article, we address the following question: Is labeling African-American students for

special education purposes in the best interest of these students? We argue that labeling African-American students in special education is not advantageous and can even be counter-productive.

We contend that whatever good intentions, once students are labeled, especially African-American students, the extra "baggage" that comes with that label may be a burden too heavy to carry. The very term "disability" suggests a deficit mode of thinking about the labeled students. Since the prefix "dis" is derived from Latin meaning "not" or "without," the term disability can be literally defined as "not having ability." To illustrate the sociolinguistic implications of this term, when combined with the word "learning" (i.e., learning disability), the term suggests not having the ability to learn. An educational system that operates on the premise that some students do not have the ability to perform at a prescribed level can promote not only deficit thinking but also discrimination—a treatment endured too frequently by African Americans.

For this group of Americans—sometimes referred to as Blacks, once upon a time as Negroes, alternatively Coloreds, and often by the disparaging "N" word with connotations of "lazy," "shiftless," and "inferior"—labeling has been historically a very serious matter, often bringing with it a plethora of differential and detrimental treatment. Given this history, we assert that adding another negative label—one that linguistically and socially suggests a deficit—to these students does more harm than good. To support this stance, we examine (a) the concept of labeling, (b) the process of categorically labeling students for special education services, and (c) what happens once these students are labeled.

In short, this article focuses on the negative impact of labeling for African-American students in special education. Although there are 13 specific categories of disability defined by law, this article focuses on the controversial categories of Learning Disabilities, Serious Emotional Disturbance (includes emotional and behavioral disorders), Intellectual Disabilities (formerly Mental Retardation), and the associated subcategories.

The Concept of Labeling

Labeling is the assignment of a descriptor to an individual based on selected behavioral and/or physical characteristics. In society, an assigned label essentially places the individual into a specified group possessing similar characteristics. By design, a label can serve the discriminatory purpose of distinguishing the individual (and others similarly labeled) from the rest of society and provide information about the individual regardless of its accuracy.

Howard Becker's (1963) classic labeling theory asserts that labels influence the perceptions of both the individual and other members of society. Once the majority members of a society (e.g., European Americans/Whites in the United States) have decided that certain behaviors are outside of the societal norms or unlawful, any individuals exhibiting such behaviors are considered deviants (or criminals). Becker maintains there is power in words, arguing that the mere labeling of someone as

a "deviant" ultimately reinforces that behavior in the person labeled. As society responds to the individual as a deviant, the individual's self-image begins to reflect the imposed label. According to Becker's theory, therefore, labeling creates a self-fulfilling prophecy; that is, the individual labeled a criminal becomes a criminal.

Becker's (1963) theory suggests the complex dynamics of labeling individuals in society. The process of labeling affects both the persons doing the labeling (the labeler) and the persons labeled (the labeled). The labelers, members of the majority (e.g., European Americans), are subject to biases (preferences), prejudices (pre-judgments; decisions based on limited or inaccurate information), and stereotypes (over-generalizations). In determining what constitutes deviance, the labelers' biases may emerge. First, the norm will likely be defined by the labelers' preferences, such that anything that contradicts those preferences will be considered deviant. Second, the assignment of deviant labels may be governed by the labelers' prejudices and stereotypes, such that individuals labeled deviants will be different from the labelers in selected characteristics. Third, biases, prejudices, and stereotypes may affect how the labeler responds to the person labeled.

This notion of deviance from the norm predisposes teachers and the public to regard some students as "acceptable" and others "unacceptable"; for example, languages and dialects differing from standard American English are viewed as substandard, and specialized instructional techniques are deemed necessary for students not performing at a requisite level—students who more often than not happen to be African Americans and other racial ethnic minorities or poor (Reid & Knight, 2006).

For African-American students saddled with an additional label, the dynamics can be detrimental. These individuals may be influenced by the power of the label and the reaction of the labeler towards them. The consequence could be the internalization of many of the biases, stereotypes, and prejudices held against them. Ultimately, these students may accept the disparaging label(s) as truth. Understanding the phenomena associated with labeling can help clarify the negative and potentially harmful influence the labeling process may have on African-American students classified as "special ed." We will discuss the influence of labeling on African-American students in greater detail later in this article.

The Special Education Labeling Process

In the U.S., the federal and state governments have chosen to use a categorical approach to identifying and placing students in need of special education services into disability groups (U.S. Department of Education, 1999). The current educational law that governs this process and supports the rights of students with identified disabilities is called the Individuals with Disabilities Education Improvement Act (IDEIA) (2004). In using this categorical approach, school systems assign children a label designating them for a specific disability category.

Currently, federal and local funding for special education is based on the

identified disability categories, so it behooves school systems to classify students accordingly. Hallahan and Kauffman (1982) and Kaufman (1993) present several advantages of special education labeling:

• Labeling students allows for easy communication among professionals about the general learning characteristics of specified disability groups.

• Labeling allows for more research targeting the best practices in working with a specific group of students who exhibit similar learning characteristics.

• Such research informs special educators in designing evidence-based interventions for effectively working with children with disabilities.

• Labeling has led to the development of instructional strategies specific to certain disabilities that have been effective when working with students.

The claimed advantages to labeling do little to convince many investigators of the merits of labeling. In fact, many investigators consistently affirm that special education labeling brings more negatives than positives for African Americans (Baker, 2002; Blanchett, 2009; Perlin, 2009). For example, Blanchett (2009) summarized major concerns of labeling as it relates to the disproportionate representation of African-American students in special education as follows:

• The problem of disproportionate representation of African Americans continues to plague the field.

• There is a tendency to place African-American students with disabilities in restrictive settings instead of in the general education classroom.

• Both general and special education classrooms fail to employ culturally responsive instructional strategies that may facilitate the achievement of African-American students.

For investigators such as Blanchett, the problems with special education labeling make the process untenable as a viable means of servicing African-American students. Concerns notwithstanding, special education is an integral part of the American educational system, and the procedures for implementation of programs and the requisite labeling of students are prescribed by law.

Exploring the Process of Labeling

The special education law dictates the necessary steps that must be followed in order to classify students as special education recipients. The disability categories of intellectual disabilities (formerly mental retardation), learning disabilities, and emotional disturbance present the greatest challenge for classification because of the subjectivity involved based on the definitions. According to IDEIA, intellectual disabilities entail below-average intellectual functioning along with deficiencies in adaptive behavior (i.e., deficient skills in daily living, communication, and social interaction); learning disabilities refer to disorders in one or more basic psychological processes associated with understanding or using written or spoken language, which

may affect the ability to listen, think, speak, read, write, spell, or do mathematics; emotional disturbance include emotional and behavioral disorders existing over an extended period of time to a marked degree that significantly affect educational performance. All three categories involve attempting to assess and evaluate psychological or emotional factors to ultimately arrive at an accurate label for a student.

Given the relatively subjective—albeit professional—decisions made in the process, it is safe to say that special education assessment is anything but an exact science, prone to misjudgments (Karcher & Sass, 2010). Interestingly, the three categories mentioned earlier are the ones in which there are a high proportion of African Americans. The process of determining a student's eligibility to be placed into one of these categories may be divided into four major steps: (1) referral, (2) assessment, (3) eligibility determination, and (4) placement. These steps are presented to illustrate how biases may influence the process of labeling.

The first step, referral, requires the teacher or other school personnel to identify any student with characteristics that suggest a disability. It should be noted that when a teacher suspects a student has a disability, remediation should be implemented with the student in order to determine the student's response to the intervention (Smith & Tyler, 2010). While guidelines are stipulated for the identification of relevant characteristics, the teacher has to make a determination based on his or her observation. It is possible that biases may affect the teacher's referral. This may be due to a teacher's unfamiliarity with or disapproval of a cultural behavior exhibited by a student. As Becker (1963) suggests, the labeler (in this case the referring teacher) is subject to biases, prejudices and stereotypes reflective of the majority (i.e., European Americans). In making a referral, a teacher who is a member of the majority group in society may be influenced by what is considered "normal" based on standards set by European Americans. When this occurs, the African-American student who might learn differently because of his or her cultural influences is at-risk of misidentification, misassessment, misclassification, misplacement, and misinstruction (Obiakor, 1998).

The second step, assessment, requires an evaluation of the student using appropriate instruments and procedures. According to IDEIA, every effort must be made to select unbiased tests when assessing student performance. Test bias refers to systematic measurement error or estimation related to the use of tests (Reynolds, 1995). A biased test can yield scores that mean one thing to one person and something different to another. Cultural bias in many of the assessment instruments used has been reported in many studies (Waitoller, Artiles, & Cheney, 2008). The most notorious instrument, The Wechsler Intelligence Scale for Children III, which is widely used to assess intelligence, has been shown to disproportionately classify more African-American students than European-American students as intellectually disabled. Aside from the potential biases in test instruments, the test administrator may also present a bias in administration or interpretation of the tests (Karcher & Sass, 2010).

The third step, eligibility determination, is the point at which a determination of a disability and the designation of a label are made based on the evidence pre-

sented and the input from all members of the assessment team. Whether or not the student has a disability is dependent on how the assessment team views the evidence. The assessment team—generally consisting of pertinent teachers, administrators, specialists (e.g., counselor, school psychologist, occupational therapist), parents, and where appropriate the student—will bring multiple perspectives to bear on the decision-making process. The biases of team members may influence the final label the student receives.

The fourth step, placement, entails placing the student in the least restrictive environment to best meet his or her needs. The goal of an assessment team is to include students in the general education classroom to the extent possible. Like previous stages, placement comes with its potential for bias. For example, unless the assessment team is knowledgeable about possible cultural differences of African-American students that may influence their behavior, the team may place a student perceived to have a behavioral disorder in a restrictive classroom environment. This error could result in adversely affecting the learning outcomes for this student (Herrera, 1998). In the end, the potential for inaccuracy in labeling exists throughout the process. When cultural differences such as those prevalent among many African-American children are evident, the risk of inaccuracy in labeling increases.

Perlin (2009) cautions that it is difficult to discuss disability labels without including race, gender, and social status because those factors often interact in the determination of whether to label or not, and what type of label to give to the child. Race and gender, in particular, appear to be high determinants of special education labeling. For example, in 2002-2003, African-American students were three times more likely to be labeled mentally retarded (intellectually disabled) and 2.3 times more likely to be labeled emotionally disturbed than all other racial ethnic groups combined (U.S. Commission on Civil Rights, 2009). In 2000, statistics indicated that although African-American males represented only 9% of the total student enrollment in the United States, they constituted 20% of the students labeled mentally retarded; similarly, in the category of emotional disturbance, they accounted for 21% of that group (U.S. Department of Education, 2000).

Labeling African-American Children

For African-American children, labeling can begin the day the child enters the classroom. In addition to possible challenges to their racial identity, many African-American children are confronted with having to make the transition from a home culture that is often at odds with the mainstream school culture (Ladson-Billings, 1994). Familiar home practices are often absent from the school environment, creating a sense of disconnectedness for many of these students. Teachers unfamiliar with cultural differences may sometimes fail to assist in the required transition from home to school (Gay, 2003). Rather than employing a culturally responsive pedagogy that would utilize the cultural competencies the students bring to school (Richards, Brown & Forde, 2007), teachers tend to rely on a traditional mainstream approach to instruction, and expect African-American students to conform. When

these African-American students do not conform to the norm (Baker, 2002), they are at risk of becoming what Becker (1963) would refer to in a normative society as "deviants." To place this in the context of our educational system, these students are at risk for a disability label. We restate, labeling is not the answer.

Teachers viewing cultural differences as counterproductive to school achievement may strive to quickly replace the home-grown practices with school-appropriate behavior. For example, many African-American boys come from a very active home environment, where they are very much involved with older siblings and relatives talking and playing (Smitherman, 2000). Much of their activity incorporates cooperative experiences of sharing and helping each other (Shade, 1989). These boys may not be accustomed to sitting in a seat and not talking to anyone while the teacher writes on the board. Because they enter school unprepared for the restrictions of the classroom, their behavior may be viewed as outside the norm, and often misinterpreted as a behavior disorder (Porter, 1997). Labeling these students will not eradicate the cultural influences on their behavior, nor facilitate adaptation to an unfamiliar school environment.

Much of the classroom disparity between African-American children and school is reflected in communication. The language of the school contrasts sharply with the language many African-American children use at home. A large number of African Americans come to school speaking an African-American vernacular or what some researchers refer to as Black English (Dillard, 1972). Beyond communication, the language serves to solidify the African-American community, even as it celebrates an important part of the African-American heritage (Smitherman, 2000). For teachers in the classroom, the cultural importance of the language is often ignored in their efforts to teach the children to speak the "right" way. Those African-American students not learning how to code switch readily to standard English risk being labeled slow learners or language deficient.

While Black English itself may predispose African-American children to unfair labels, their style of communication may also send up red flags to teachers. African Americans come from a long oral tradition, where telling stories with embellishments is common (Smitherman, 2000). Children growing up in this environment learn how to reflect on that rich oral tradition by injecting as many supportive or side stories as possible in order to present the most entertaining tale. This practice usually means straying from the main point while additional—outsiders might say superfluous—information is presented. Researchers (Michaels & Cazden, 1986) have discovered that the main thread of the story remains intact, and that careful analysis of the presentation will reveal a logical flow. Michaels and Cazden have referred to this type of storytelling as "topic-associative" speech in contrast to "topic-centered" speech which is the predominant mode of speech in mainstream classrooms. Because teachers may view topic associative speech as a deficit rather than a difference in communication, children using this speaking style run the risk of being characterized as incoherent or lacking adequate oral skills. A language learning disability label could erroneously follow.

The type of conversation children engage in at home influences their language behavior at school. Heath (1983) in her classic study of three communities in the Carolinas discovered that the Black community, Trackton, posed particular types of questions to their children. Why- questions predominated family discussions. When the Trackton children entered school and teachers asked them What-questions, unaccustomed to such simple factual queries, the children appeared confused about what kind of response was really expected. These disconnections between the linguistic practices at home and school made the children appear unprepared for school, if not language deficient.

Combating the linguistic biases of school presents a challenge for African-American children, especially since so much of the evaluation in the primary grades revolves around language. Once teachers perceive an early deficiency, as well intentioned as their judgment might be, the potential detriment of a label exists. If the child is labeled, in addition to the associated stigma, the child may be subjected to unnecessary language remediation based on a deficit model of intervention (i.e., the child is lacking language competency). If anything, the child may simply need to be taught how to code switch from his or her home language to the language of the standard American English classroom. A label is not necessary to accomplish this. Therefore, labeling is not the answer.

Cultural Differences and Assessment

As noted earlier in this article, cultural differences play a significant role in students' adjustment to and achievement in the classroom, particularly in the interaction of student and teacher. Cultural differences may also impact the classification of African-American students for special services, particularly affecting the labels of Emotional Disturbance, Intellectual Disability, and Learning Disability.

Classification for services is determined by assessing students in one or more of four general areas: (1) Cognitive Ability, (2) Achievement, (3) Communication, and (4) Behavior (IDEIA, 2004). The assessment of Cognitive Ability is an attempt to measure a student's intellectual functioning. The area of Achievement is assessed by examining a student's acquired academic skills in subjects such as mathematics and reading. In assessing Communication, both verbal and nonverbal language (e.g., gestures) is evaluated. The assessment of behavior involves investigating a student's actions and interactions in social and instructional settings.

Attempting to assess or evaluate these areas may be highly influenced by culture. For African-American children who display many of the cultural characteristics mentioned earlier (i.e., dialect usage and topic-associative speech), potential conflicts may arise with the norm-based, culturally-laden tests used in assessment (Helms, 1997). Table 1 below illustrates some potential conflicts.

Effects of Labeling

The greatest danger of special education labeling, however, is what happens as a result of this process. To an African-American child, any label in the school

150

environment may be one too many labels to carry. Jan Hunt of the Natural Child Project (2010) suggests that "labeling a child is disabling" (p. 3) because children believe what adults tell them. Therefore, if children are told they are disabled (or lack certain abilities), then they tend to live up to that description. Learned helplessness (Powell, 1990), the belief that one cannot complete tasks (e.g., school work) without the assistance of someone else, is a common phenomenon among students who have been labeled with a disability. Consistent with Becker's (1963) labeling theory described earlier in this paper, the student's self image begins to reflect the imposed label. While this may apply to any child, the compounding impact on an African-American child could be severe, given the history of other denigrating labels people of African descent have had to suffer in the United States. Once labeled with a disability, the academic outcomes for African-American students are not promising. In fact, the U.S. Commission on Civil Rights (2009) reported that the high school graduation rates for African-American students with disabilities was 36.2, the lowest for any racial ethnic group.

Labeling may limit the expectations for students classified with a disability. Henley, Ramsey, and Algozzine (2009) note that teacher expectation is a major

Table 1
Potential Assessment Conflicts for African American Students

Area of Assessment	Potential Conflict for African American Students (AAS)	Potential Classification Labels
Cognitive Ability	AAS may not demonstrate true ability because of cultural biases in standardized instruments (e.g., WISC III) or testing procedure	ID, LD
Achievement	AAS may not demonstrate true achievement because of cultural biases in instruction or standardized instruments	ID, ED, LD
Communication (Verbal and Nonverbal)	AAS may not demonstrate true language competency because assessment may be biased against dialect differences (e.g., Black English); or language practices (e.g., topic associative speech, or responses to What-questions versus Why-questions)	ID, LD
Behavior	AAS may not demonstrate typical/acceptable behavior because of cultural differences in social interaction	ED, ID, LD

Note: ID=Intellectual Disability, ED=Emotional Disturbance, L=Learning Disability

predictor of student success; therefore, when a teacher receives a student who has a disability label, the awareness of that label may negatively shape that teacher's interactions with and expectations of that student. Moreover, disability labels often frustrate teachers into believing that the labeled student has a problem they cannot fix. As teachers give up on African-American students with disability labels, the students give up on themselves and no longer believe they can be successful, or no longer want to be successful.

African Americans tend to be wary about any personal label, and that of "disability" is no exception. Unlike many middle-class European-American parents who might be eager for their children to receive the services offered by being admitted into a special education program, many African-American families view this specialized educational service as an opportunity to be further disenfranchised from the school community due to the negative stigma a special education label brings (Patton, 1998). Much like the infamous "A" in Nathaniel Hawthorne's (1850) the *Scarlet Letter*, the brand of "Special Education" can ostracize children in a most pernicious way, leaving them feeling like outcasts. Reminiscent of Becker's (1963) theory indicating selected differences between the labelers and the labeled, too many of these outcast students with disabilities are African Americans possessing cultural—and to some extent physical—characteristics that differ from those of the European-American majority. In view of the racial history in America (Lin, 2007), some researchers have suggested that special education labeling, specifically for African-American students, is a new form of segregation and racism (Losen & Orfeld, 2002); therefore, labeling is not the answer.

In this society, the negative stigma associated with a disability label, particularly for African Americans, is a fateful step that can follow them for a lifetime. From their school-age years into adulthood and independent living, African-American students may be impacted by the lasting effects of the special education label. Specifically, employability may be affected as indicated by Blanchett (2006) who noted that African Americans leaving special education have a more difficult time finding jobs and getting into college than their European-American counterparts.

Differential Effects for European-American Students

Although there are problems in special education labeling for both African-American children and European-American children, many parents of European-American children accept the labels their children are assigned more readily than African-American parents. This may be because the labels generally assigned to European-American children tend to be more "benign" (or carry fewer socially restrictive stigmas) than those given to African-American children (Reid & Knight, 2006). Often children who have demonstrated skill-specific struggles with academic work are labeled as having a learning disability (includes the designation of dyslexia), and children who might exhibit more social or behavioral concerns are often designated as emotionally disturbed. European Americans are more likely to be designated learning disabled—particularly dyslexic—and African Americans, emotionally disturbed.

152

Blanchett (2006) argues that special education for White children constitutes a subsystem in American education (along with other subsystems). Despite their varying abilities, these children are more likely to be included in general education classes, and to receive all the recommended supports in these classes, than are their African-American counterparts. A significant number of these European-American students receive regular high school diplomas and continue onto college. Their success in college is facilitated by the required supportive services, including accommodations such as extra time on tests that are the "benefits" of their disabilities.

In contrast, African-American students have not been as fortunate as European-American students in reaping the benefits of labeling. When African Americans are labeled, Harry and Anderson (1994) reported that these students tend to be placed in more segregated settings and receive less instructional time than their European-American counterparts. These students also suffer a higher school dropout rate than any other racial ethnic group (U.S. Commission on Civil Rights, 2009). Hence, there is no question about it—for African-American students, labeling is not the answer.

Conclusion

Why is labeling not advantageous for African-American students in special education? Baker (2002) revealed that special education labeling sets up a paradigm of what is normal and what is not. The "eugenics of normalcy" (Baker, 2002, p. 692) dictates that those students labeled need to be normalized or perfected. The assumption is that these children possess an inherent deficiency. The educational system prescribes special education labeling to correct the presumed deficiency and make these students "normal." Again, our position, most emphatically, is that labeling is not the answer. For centuries, people of African descent have been labeled, mislabeled, and re-labeled, often by others and sometimes by themselves. In addition to the identity turmoil that the changing labels have produced, such labels have brought with them nefarious discrimination with charges of inferiority. Adding another label to an African-American student, such as "intellectually disabled," "learning disabled," or "emotionally disturbed" —albeit for purportedly instructional purposes—opens the door to a host of additional challenges.

Unlike African Americans, European Americans do not bear this historical burden of labeling. Therefore, labeling European-American children with special education descriptors, while not always the most beneficial, does not necessarily re-enforce annals of bigotry. African-American children, on the other hand, do not need another label that carries the risk of further stigmatization for inadequate ability. Fairness and equality demand that the educational system provide African-American students, along with every other student, all the academic support they need, but labeling is not the answer.

References

Artiles, A. J., &Trent, S. C. (1994). Overrepresentation of minority students in special

education: A continuing debate. *Journal of special Education, 27*(4), 410-437.

Baker, B. (2002). The hunt for disability: The new eugenics and the normalization of school children. *Teachers College Record*, *104*(4), 663 -703.

Becker, H. S. (1963). *Outsiders: Studies in the sociology of deviance*. New York: The Free Press.

Berlin, J. (2009). Its' all the matter of perspective: Student perceptions on the impact of being labeled gifted and talented. *Roper Review*, *31*, 217-223.

Blanchett, W. J. (2006). Disproportionate representation of African American students in special education: Acknowledging the role of White privilege and racism. *Educational Researcher, 35*(6), 24-28.

Blanchett, W. J. (2009). A retrospective examination of urban education: From Brown to the resegregation of African Americans in special education—it is time to "Go for broke." *Urban Education, 44*(4), 370-388.

De Valenzuela, J. S., Copeland, S. R., Qi, C. H., & Park, M. (2006). Examining educational equity: Revisiting the disproportionate representation of minority students in special education. *Exceptional Children*, *72*(4), 425-441.

Dillard, J. L. (1972). *Black English: Its history and usage in the United States*. New York: Random House.

Dunn, L. (1968). Special education for the mildly retarded: Is much of it justifiable? *Exceptional Children 7*, 5-24.

Gates, J. (2010). Children with gifts and talents: Looking beyond traditional labels, *Roeper Review*, *32*, 200-206.

Gay, G. (Ed.). (2003). *Becoming multicultural educators: Personal journey toward professional agency*. San Francisco: Jossey-Bass.

Hallahan, D. P., & Kauffman, J. M. (1982). *Exceptional children: Introduction to special education.* Englewood Cliffs, NJ: Prentice Hall.

Hawthorne, N. (1850). *The scarlet letter,* New York: Appleton-Century.

Harry, B. & Anderson M. G. (1994) The disproportionate placement of African-American males in special education programs: A critique of the process. *The Journal of Negro Education*, *63*(4), 602-619.

Heath, S. B. (1983). *Ways with words: Language, life, and work in communities and classrooms*. Cambridge, UK: Cambridge University Press.

Helms, J. E. (1997). The triple quandary of race, culture, and social class in standardized cognitive ability testing. In D. P. Flanagan & J. L. Genshaft (Eds.), *Contemporary intellectual assessment: Theories, tests, and issues* (pp. 517-532). New York: The Guilford Press.

Henley, M. Ramsey, R. S., & Algozzine, R. F. (2009). *Characteristics of and strategies for teaching students with mild disabilities*. Upper Saddle River, NJ: Pearson Education.

Herrera, J. (1998). *The disproportionate placement of African-Americans in special education: An analysis of ten cities*. (ERIC Document Reproduction Service No. 423 324).

Hirschi, T. (1969). *Causes of delinquency*. Berkeley, CA: University of California Press.

Hunt, J. (2010). "Learning disability": A rose by another name. *The Natural Child Project*. Retrieved November 17, 2010, from http://www.naturalchild.org/jan_hunt/learning.html

Individuals with Disabilities Education (Improvement) Act Amendments of 2004, 20 U.S.C. 33 § 140 *et. seq.*

Irving, M. A., & Hudley, C. (2008). Cultural identification and academic achievement among African-American males. *Journal of Advanced Academic*, *19*(4), 676-698.

Jost, J., & Banaji, M. (1994). The role of stereotyping in system justification and the production

of false consciousness. *British Journal of Social Psychology*, *33*, 1-27.

Kauffman, J. M. (1993). How we might achieve the radical reform of special education. E*xceptional Children, 60*, 6-17.

Karcher, M. J., & Sass, D. (2010). A multicultural assessment of adolescent connectedness: Testing measurement invariance across gender and ethnicity. *Journal of Counseling Psychology*, *57*(3), 274-289.

Ladson-Billings, G. (1994). *The dreamkeepers: Successful teachers of African-American children.* San Francisco: Jossey-Bass.

Landrum, T., Tankersley, M., & Kauffman, J. (2003) What is special about special education for Students with emotional or behavioral disorders? *The Journal of Special Education*, *37(3),* 148-156.

Lin, L. (2007). (Mis-) Education into American racism. *Teachers College Record, 109*(7), 1725-1746.

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

Michaels, S., & Cazden, C. (1986). Teacher/child collaboration as oral preparation for 14 literacy. In B. B. Shieffelin & P. Gilmore (Eds.), *The acquisition of literacy: Ethnographic perspectives* (pp.132-154). Norwood, NJ: Ablex.

Nagliery, A., & Rojahn, J. (2001) Intellectual classification of Black and White Children in special education programs using the WISC-III and the cognite assessment system. *American Journal on Mental Retardation, 106*(4) 359-367.

National Assessment of Educational Programs. (2007). *Fast facts on closing the achievement gap*. Retrieved September 9, 2010, from http://nces.ed.gov/nationsreportcard/aera.asp

National Governors Association Center for Best Practices. (2007). *Closing the achievement gap*. Retrieved from http:/www.subnet.nga/org/education/achievement

Obiakor, F. E. (1998). Teacher expectations of multicultural exceptional learners: Impact on "accuracy" of self-concepts. Paper presented at the Council for Exceptional Children (ERIC Document Reproduction Service No. 419 311).

Palmer, J., Olivarex, A., Wilson, V. & Fordyce, T (1989) Ethnicity and language dominance; influence of the predictation of achievement based on illegene test scores in non referee and referred samples. *Learning Disabilities Quarterly, 12*(4) 261-274.

Patton, J. (1998). The disproportionate representation of African Americans in special education, looking behind the curtain for understanding and solutions. The *Journal of Special Education, 32*,(1) 25-31.

Perlin, M.L. (2009). "Simplify you, classify you": Stigma, stereotypes and civil rights in disability classification systems. *Georgia State University Law Review*. Paper 1175. Retrieved November 17, 2010, from http://digitalarchive.gsu.edu/colpub_review/1175

Powell, L. (1990). Factors associated with the underrepresentation of African Americans in mathematics and science. *The Journal of Negro Education*, *59*(3) 292-298.

Porter, M. (1997). *Kill them before they grow, misdiagnosis of African-American boys in American classrooms*. ERIC Document Reproduction Service No. 419 046).

Reid, D. K, & Knight, M. G. (2006). Disability justifies exclusion of minority students: A critical history grounded in disability studies. *Educational Researcher, 35*(6), 18-23.

Reyna, C. (2008). Ian is intelligent but Leshaun is lazy Antecedents and consequences of attributional stereotypes in the classroom. *European Journal of Psychology of Education*, *23*(4), 439-458.

Reynolds, C. R. (1995). Test bias and the assessment of intelligence and personality. In D. H. Saklofske & M. Zeidner (Eds.), *International handbook of personality and intelligence*

(pp. 545-573). New York: Plenum.

Richards, H. V., Brown, A. F., & Forde, T. B. (2007). Addressing diversity in schools: Culturally responsive pedagogy. *Teaching Exceptional Children*, *39* (3), 64-68.

Rosenthal, R., & Jacobson, L., (1968). *Pygmalion in the classroom: Teacher expectation and pupils' intellectual development*. New York: Rinehart and Winston.

Shade, B. J. (1989). Culture and learning style within the Afro-American community. In B. J. Shade (Ed.), *Culture, style, and the educative process* (pp. 16-32). Springfield, IL: Charles B. Thomas.

Smith D., & Tyler, N., (2010) *Introduction to special education: Making a difference*. (7th ed.) Upper Saddle River, NJ: Merrill/Pearson Education.

Smitherman, G. (2000). *Talkin that talk: Language, culture, and education in African America*. New York: Routledge.

Terrell, F., & Terrell, S. L. (1981). An inventory to measure cultural mistrust among Blacks. *Western Journal of Black Studies, 3*, 180-185.

Terrell, F., Terrell, S. L., & Miller, F. (1993). Level of cultural mistrust as function of educational and occupational expectations among Black students. *Adolescence, 28*, 572-578.

U. S. Commission on Civil Rights. (2009). *Minorities in special education*. Retrieved on November 17, 2010, from http://www.uscce.gov/pubs/MinoritiesinSpecialEducation.pdf

U. S. Department of Education. (2000). *Twenty-second annual report to Congress on the implementation of the Individuals with Disabilities Act*. Retrieved on November 17, 2010, from http://www2.ed.gov/about/reports/annual/osep/2003/25th-vol-1-sec-1.pdf

U. S. Department of Education. (1999). Assistance to states for the education of children with disabilities program and the early intervention programs for infants and toddlers with disabilities: Final regulations. *The Federal Register*, *34*, CRF Parts 300 and 303.

Waitoller, A., Artiles, A., Cheney, A. (2010). The miner's canary: A review of overrepresentation research and explanations. *The Journal of Special Education, 44 (1),* 29-49.