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# Examining the Legacy of *Brown*

## *The Impact on Special Education and Teacher Practice*

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### ABSTRACT

The *Brown v. Board of Education* (1954) case has left a lasting impact on the way children are educated in this country. Much has been written about the legacy of *Brown* as it relates to current desegregation practices, academic achievement for students of color, and school reform. This paper will examine the implications of the *Brown* decision on reform efforts in special education, as well as address the need for greater emphasis on teaching that reflects an understanding of the intersection of race, culture, and class.

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THE END OF SEGREGATION MARKED A PIVOTAL time in our country's history. The *Brown v. Board of Education* (1954) decision challenged the very core of what had become the bedrock of racial discrimination and prejudice in this country—segregation. This case and its aftermath have been analyzed and critiqued for more than 50 years. There is no doubt that the case has had a lasting impact on the schooling of America's children. Yet what remains is the essential question that guided the struggle for desegregation in *Brown*: Have African American students benefited from integrated schools? More important, has the integration that did occur been manifested in positive student outcomes for its primary beneficiaries, African American children?

It is critical to explore the legacy of *Brown* by addressing student achievement. Inherent in the *Brown* decision was the belief that African American students would receive a

quality educational experience in integrated schools and that this experience would ultimately lead to students reaping the benefits of higher academic achievement, such as greater economic and employment opportunities (R. W. Irvine & Irvine, 1983; Jones, 1978; Patterson, 2001; Rodgers & Bullock, 1974). However, what is strikingly absent from this assumption of academic gain are decisions regarding teacher preparation, curriculum, and pedagogy as well as their relevance to African American students in segregated or desegregated schools (Gay, 2004). In addition to the focus on student achievement, any measurement of the success of the *Brown* decision must also address the extent to which African American students and their European American counterparts have benefited from exposure to and engagement with each other. In other words, does a racially and culturally diverse student body influence how students feel about themselves and, ultimately, how they perceive and interact with their peers? Furthermore, are these social effects positive or negative for either group? Finally, both these areas of inquiry about achievement or social impact are related to the ability of European American teachers to effectively teach African American children and collaborate with African American families. Questions about the impact of European American teachers are particularly important in light of the fact that currently more than 80% of teachers in public schools are European American. Moreover, the notions of African American students' meaningful and purposeful engagement in school and their collaboration with diverse peers and adults have become the cornerstone of a number of current culturally responsive re-

form initiatives that advocate for placing race and culture at the center of teaching and learning.

This article will examine the legacy of the *Brown* decision and its impact on the field of special education, particularly as it relates to teacher diversity, instructional practices, and interactions between teachers and students. Furthermore, we will explore issues in special education, such as disproportionate representation and poor student outcomes, which greatly affect students of color and students from impoverished backgrounds. We assert that there is a need for greater understanding of the evolution of culturally responsive teaching, the roots of which can be traced back to segregated schools for students of color. Although segregated settings often lacked physical and fiscal resources (Ravitch, 2000–2001), they were still institutions where excellence was not only the expectation but the standard for African American students (Siddle-Walker, 2001). The expectation of excellence is one of the key elements of culturally responsive and relevant teaching. In contrast, a great deal remains to be learned in order to effectively combat issues inherent in the disproportionate representation of students of color in special education and lower tracks. Researchers need to focus on such phenomena as lower teacher expectations, misdiagnoses, and a general lack of understanding of the role of race and culture in teaching and learning. Therefore, we will share the implications of the *Brown* decision for special education and offer suggestions for future research on how to incorporate multiculturalism in special education so that students of color have access to a quality education.

### **BROWN: A CASE OF ACCESS**

As early as 1935, prominent scholar and activist W. E. B. DuBois pondered the legitimacy of integrated schools. He concluded in his controversial essay “Does the Negro Need Separate Schools?” that the needs of African Americans centered more on having access to education than on where this education is provided. Moreover, DuBois stressed that the focus should be on the quality of instruction provided to African American students. It was during this time that the dichotomy between access and placement was first addressed. Hence, it was assumed that a change in placement from segregated to desegregated schools would result in improved outcomes for African American students. However, history has illustrated that unless structures are in place to address the contextual factors associated with teaching students of color and working effectively with their families, the promises of *Brown* will continue to elude the very students it sought to protect.

The message inherent in the *Brown* decision was that schools serving European American students were somehow superior to schools serving African Americans. It was also assumed that the manner in which European American children were taught was normative and would thus translate into

educational equality if all students received the same type of educational experience (Gay, 2004; Hudson & Holmes, 1994). These assumptions, however, may not have been valid.

Jones (1978) asserted that “equal educational opportunity is conceived as being the primary means of equipping the young with the mental and attitudinal tools, as well as the body of knowledge, necessary to later gain access to all parts of society, especially in occupation and income” (p. 1). However, reviewing current data on the achievement gap between students of color and their European American peers, as well as the poor graduation and employment rates for African Americans and Hispanic Americans, has left some people questioning the legitimacy of the *Brown* rationale and decision. Many continue to search for answers to dilemmas that existed in schools of the past as well as in modern schools.

### **THE PROMISE OF SPECIAL EDUCATION**

Special education was founded on the premise that individualizing instruction for children who were experiencing educational problems would help them to catch up to their schoolmates. The concept of individualization was one of the fundamental philosophical underpinnings of special education and continues to be touted as a critical indicator of positive student outcomes (Kaufman & Pullen, 1996). Moreover, individualization represents the primary mode through which students with disabilities are provided access to curriculum. What has been missing from the discussion on effectively meeting the needs of students of color through individualized instruction is an emphasis on teaching within a cultural context. Traditionally, individualized instruction has primarily addressed issues such as curriculum, instructional strategies, and achieving mastery. Yet we have learned that teaching does not occur in a vacuum, and understanding the interlinking of contextual variables such as race, culture, and poverty is critical to providing quality educational experiences to students of color (Delpit, 1995; Hilliard, 1992; Neal, McCray, Webb-Johnson, & Bridgest, 2003).

Efforts to provide individualized instruction in special education should include the consideration of principles gained from learning styles and cognitive research on students of color. Yet this area of research under the general theme of access to curriculum has received limited attention. According to J. J. Irvine and York (2001) “learning styles is based on the theory that an individual responds to educational experiences with consistent behavior and performance patterns” (p. 484). In sum, the learning styles concept encompasses mental, physical, and emotional growth and development but not the cultural implications of teaching and learning.

A number of researchers have attempted to define ways in which students of color respond to learning environments and conditions and to identify learning style characteristics of various ethnic groups (J. J. Irvine & York, 2001). For example, Boykin (1994) proposed that African American students’

experiences and interactions are grounded in at least nine interrelated dimensions of African American culture: spirituality, harmony, movement, verve, affect, communalism, expressive individualism, oral tradition, and social time perspective. If educators pay attention to these dimensions of African American children's learning styles, they might be able to use culture as a frame of reference for interaction and instruction. By attending to these dimensions of African American children's learning, educators can begin to understand the role of culture in student performance and use this information in cultivating relationships with students of color as well as in their instructional practices. In addition to the research conducted by Boykin (1994) and other scholars whose work directly affects African American students, an understanding of the links between culture and student engagement can illustrate the various ways in which students of color respond to differing environments (Hilliard, 1992; Kunjufu, 1982).

In addition to the work on cultural dimensions by Boykin (1994), ideas about field dependence and independence have garnered scholars' attention. Field dependence and field independence refer to cognitive constructs that characterize the learning styles and behaviors of students, and many students of color seem to represent special cases of these constructs (Ramirez & Casteneda, 1974; Saracho & Spodek, 1984). *Field-independent* learners can be characterized as more conceptual thinkers and, thus, analytical by nature. These students may benefit from activities that allow them to work independently and offer them opportunities for in-depth exploration and discovery. Conversely, *field-dependent* learners prefer to work cooperatively with others and thrive in engaging and interactive environments. African American students have been conjectured to achieve more in situations where they can be field dependent. However, it is important not to prescribe according to race or ethnicity and to note that these learning styles are not mutually exclusive. Students may exhibit behaviors associated with both styles. Furthermore, although cultural variables related to predicting and accommodating optimal learning environments have been identified as important and powerful, the extent to which culture is manifested in individual students of any race or ethnicity varies and may be mediated by other variables such as social class, gender, and intracultural variability.

J. J. Irvine and York (2001) have posed critical questions that must be considered when interpreting cultural lines of research. Their questions explore the significance of culture as the primary variable that influences learning styles; the legitimacy of applying the characteristics of the cultural group in question uniformly to individual members of the group; the relationship between teachers' instructional practices and students' learning styles; and the teaching of students of color exclusively using their preferred learning style as a frame of reference. With the renewed interest in extending access to education to all students by providing students with disabilities with opportunities to meaningfully engage with the general education curriculum, the field of special education must

explore what constitutes meaningful access and to what extent access is mediated by factors such as race and culture or by the nature of particular contexts.

## THE REALITY OF SPECIAL EDUCATION

As early as 1968, Dunn characterized the population of classrooms for students identified with mental retardation as containing a disproportionate number of students of color and students from poor and disadvantaged backgrounds. This observation was made after the *Brown* decision (1954), which promised desegregation "with all deliberate speed." In actuality, however, the speed was painfully slow and stalled because many people held on to vestiges of prejudice that resulted in continuing inequities for African Americans (Paterson, 2001). In fact, many schools failed to desegregate, and although physical access to supposedly desegregated schooling was not denied, de facto residential segregation meant that many schools were as segregated as they had been prior to *Brown*.

What followed the *Brown* decision was the systematic tracking of African American students into remedial and special education programs. Some have seen this as a deliberate decision to segregate children by race and class within schools. Others have tended to blame personal biases in teacher expectations and referrals as well as cultural biases in testing. The *Larry P. v. Riles* case (1979) questioned the legitimacy of relying solely on intelligence tests in the placement of African American students in programs for children with mental retardation in the state of California (Prasse & Reschly, 1986). Another issue illuminated in the *Larry P.* controversy concerned the efficacy and quality of special education programs (Artiles & Trent, 1994; Harry & Anderson, 1995). To this day, many scholars continue to question the use of intelligence tests in special education and the efficacy of programs for students with disabilities (Artiles & Trent, 1994; Oswald & Coutinho, 2001; Patton, 1998).

The U.S. Constitution mandates equal opportunities for all citizens. This equal protection clause is the basis for providing access to public education to all students. However, for students of color and students with disabilities, the quest for access has been riddled with denials and, hence, with litigation and legislation designed to remedy barriers to access. Prior to the mid-1970s, many schools failed to provide programs for students who were considered "uneducable" (Martin, Martin, & Terman, 1996). Thus, similar to students of color, the struggle that children with disabilities face to secure access to education remains a legacy that the field will need to overcome in order to solve the perennial problems of access and move beyond them to a more result-oriented paradigm.

Negligent practices that barred some children from access to quality education went virtually unchallenged until Section 504 of the Rehabilitation Act of 1973 and the Education for All Handicapped Children Act of 1975 became effective.

tive in 1978. The purpose of Section 504 was to ensure that people with disabilities were not denied the funding needed to ensure them an appropriate education. The power of Section 504 was limited in comparison to the Education for All Handicapped Children Act, which required that all students with disabilities receive a free, appropriate public education and a means to fund specialized education. Since then, this law has been renamed the Individuals with Disabilities Education Act (IDEA) of 1990 and has been amended several times, usually in ways that recognize the cultural biases of the past and the lack of diverse family participation in the decision-making process surrounding the nature of an appropriate education.

The reality is that despite IDEA mandates to school districts to identify and evaluate students with disabilities, while taking into consideration language and cultural issues and protecting the rights of students by requiring parental input and implementing due process through outlined procedural safeguards, students of color and students from impoverished settings remain at greater risk for placement in special education. The differential treatment of students of color in special education based on labeling and residential placement has been well documented and has failed to be solved by legislative updates (Harry, 1994). Appropriate placement in special education is determined based on a continuum of services ranging from consultative services in a general education setting to education in a hospital, residential, or homebound setting. However, according to the U.S. Department of Education (2000), approximately three million children with disabilities received inappropriate or inadequate services, whereas an estimated one million students were totally excluded from the educational system. This problem is exacerbated for students of color, particularly those in urban areas, who are predominantly placed in the most segregated and restrictive settings in public schools (Harry, 1994).

Furthermore, the extent to which students with disabilities are provided with high-quality programming in special education is related to the availability of qualified personnel. The national teacher shortage has received a great deal of attention (Darling-Hammond, Berry, Haselkorn, & Fidelar, 1999). The problem is especially acute in urban and rural settings (McLeskey, Tyler, & Flippin, 2004). The U.S. Department of Education (2003) reported that during the 2000–2001 school year, 47,532 individuals filling special education teaching positions (approximately 11.4% of all teachers) lacked appropriate special education certification. Consequently, 98% of school districts in the United States reported special education shortages (Fidelar, Foster, & Schwartz, 2000). The magnitude of the shortages in special education teachers has been documented by location, job description, and teachers' racial or ethnic background, as well as across disability categories (McLeskey, Tyler, & Flippin, 2004). The shortages that are of particular importance to this discussion on the legacy of *Brown* are in the area of providing culturally and linguistically diverse (CLD) personnel.

Although desegregation promised increased opportunities for African American students, it resulted in the displacement of more than 38,000 African American educators (Hudson & Holmes, 1994). The loss of this valuable resource in America's public schools is reflected in the current shortages of CLD educators in public schools and teacher preparation programs. This shortage is particularly problematic in the field of special education, where 38% of students with disabilities are characterized as CLD (Billingsley, 2004), and only 14% of teachers and participants in teacher education programs are from CLD backgrounds. Olson (2000) has noted that if these trends continue, by 2009, 40% of the students and only 12% of the teachers will be from CLD backgrounds. The lack of teachers of color in the nation's public schools represents one of the unintended consequences of the *Brown* decision and is an indictment of the progress made in the years following desegregation. However, the need for CLD teachers, particularly in special education—to reflect the changing diversity of the nation's students, to mediate the effects of the cultural mismatch prevalent in public schools, and to use cultural knowledge in teaching practices—is critical to fulfilling the intent of the *Brown* decision.

## MULTICULTURAL ISSUES IN SPECIAL EDUCATION

Disproportionate representation in special education has a well-documented history and has been the subject of more than 30 years of inquiry. The issue has been examined from several vantage points, such as assessment, teachers' interactions with and behavior toward students of color, and the calculation of different types of disproportionality. Twenty years after its first report that outlined the overrepresentation of African Americans in programs for children with mental retardation and emotional disturbance, the National Research Council (NRC; 2002) was again asked to address the following question: Is the disproportionate representation of African Americans in special education a real or a perceived problem? It is only necessary to examine the resegregation currently taking place in special education, the achievement data for students of color in relation to their European American peers, and the postschool outcomes for students of color to answer definitively that disproportionate representation in special education is a real and persistent problem. In addition to responding to the challenge of disproportionality as a legitimate problem in special education, the NRC report addressed the impact of contextual factors such as poverty on student readiness and achievement. Yet disproportionality remains a persistent problem despite efforts by researchers, community activists, families, and educators to increase awareness and provide insights gained from research conducted in the aforementioned areas.

An issue inherent in the discussion of disproportionate representation that is often not addressed is the perpetuation

of the arrangement of power and privilege in America's schools. This arrangement is based on the presumption of power, which grants privileges to some and penalizes others (Day-Vines, 2000). Patton (1998) and other theorists (Delpit, 1995; Freire, 1971) have supported the notion that public education is grounded in structured power relationships designed to serve the interests of the dominant social, political, and economic classes. Because schools are only a microcosm of the larger society, it is not surprising that racism and discrimination are reflected in the structure of schools, curriculum, teacher attitudes and behaviors, and interactions of the school with students and the community (Nieto, 2000). For example, the work of Peggy McIntosh (1989) provided a glimpse into the innumerable privileges extended to European Americans and the systems of dominance firmly entrenched in American society.

Another issue, related to the way disproportionate representation is analyzed, is the perception of the ineffectiveness of special education. Students of color are overrepresented in other programs, like Head Start and Title I programs, but these programs are perceived as effective in meeting the educational needs of their students (MacMillan & Reschly, 1998). Conversely, special education was considered a dead-end program by Judge Peckham in the *Larry P.* case (1979), and, to this day, many still believe that placement in special education leads to lower expectations and achievement for students of color (Meyer & Patton, 2001). However, the research used to illustrate the ineffectiveness of special education during the *Larry P.* case employed physical setting as the critical element of analysis. This is problematic due to the disregard of other variables, such as teacher-student interactions and instructional methods. Currently, the empirical evidence available on the effectiveness of special education for students of color remains inconclusive (Artiles & Trent, 1994).

Scholars in the field of special education have made theoretical strides in addressing issues associated with race and culture and their impact on the referral and placement process. Yet there is much work to be done in narrowing the divide between research in multicultural issues and the implementation of these findings in actual educational settings. Utley and Obiakor (2001) proposed that multicultural education and special education share common features. Students of color placed in special education thus experience double discrimination due to the nature of their disability and to other factors, such as race and poverty. Similar to multicultural education, grievances regarding student underachievement in special education have had to be remedied through legislation and litigation.

Although many special education scholars feel that multicultural issues are important, the linking of multicultural education and special education can be problematic. In fact, some have proposed that the pairing of diversity and disability inadvertently diverts attention from achieving equitable educational treatment for students of color (Ball & Harry, 1993; Seidl & Pugach, 1998). An additional concern with the link-

ing of diversity and disability is the possibility that many special educators may perceive that they are already committed to diversity due to their chosen career path and, consequently, believe that by embracing the concept of diverse learners, they also recognize and value the cultural backgrounds of students of color (Seidl & Pugach, 1998). Until general and special educators recognize what Delpit (1995) termed the culture of power and effectively deal with the distinctions between race, class, and culture, the special education field will continue to focus on poor test scores and low student motivation, which are merely the symptoms of student underachievement, and not the causes (Delpit, 1995; Gay, 2000).

## CULTURALLY RESPONSIVE TEACHING

### *Lessons From the Past*

The roots of culturally responsive teaching lie in the constructivist framework of instruction and the evolution of multicultural education. According to Schlechty (1990), constructivist perspectives share two basic beliefs—that learners actively construct their own knowledge and that in order to construct knowledge, curriculum emphasis, classroom interaction, and classroom dynamics must change in fundamental ways. The epistemological view of knowledge acquisition emphasizes knowledge construction rather than knowledge transmission (Applefield, Huber, & Moallem, 2000). Although there are many interpretations of constructivist theory, for the most part, scholars agree that it requires a shift in teaching so that student understanding is placed at the center of what takes place in classrooms (Prawat, 1992).

A critical element in the evolution of multicultural education has been the persistent lack of culturally responsive teaching for students of color. This is not surprising given that the advent of multicultural education took place in response to educational inequities in public schools, which continues to be an area of concern (Nieto, 2000). Due to the emphasis on poor educational outcomes for students of color, culturally responsive teaching is one of two models stemming from multicultural education, which explicitly addresses student achievement (Ogbu, 2001). J. J. Irvine and Armento (2001) reported that the term *culturally responsive teaching* can be used interchangeably with other terms such as culturally responsible, appropriate, congruent, compatible, relevant, and multicultural teaching. These terms all imply that teachers recognize and value the cultural contributions of their students and use their knowledge of children's cultures to inform their pedagogical practices and employ that knowledge in designing their instructional strategies.

The concept of culturally responsive teaching is not a recent invention. In fact, the principles of culturally responsive teaching can be traced back to segregated schools in the South. Siddle-Walker (2001) noted a failure to provide a historical account of the contributions of African American

teachers prior to segregation, which can be linked to what has been labeled “good teaching” in current research. This is particularly problematic when attempting to trace the evolution of teacher practices prior to desegregation to current practices that rely on similar principles. However, through oral histories, researchers have been able to identify the characteristics of teachers who successfully taught students of color in segregated settings, and this has guided the current research in the field of culturally responsive and relevant teaching (Foster, 2001; Siddle-Walker, 2001).

Scholars have noted the unique contributions of teachers of color related to their ability to work effectively with students of color and their families (Foster, 2001; Haberman, 1995; Stanford, 1997). With this in mind, it is interesting to note that one of the unintended—or possibly intended—consequences of the *Brown* decision was the loss of more than 38,000 African American teachers and administrators who were unable to secure employment in the field of education (Hudson & Holmes, 1994). Although the contributions of African American teachers were diminished following desegregation, researchers have been able to document the philosophical beliefs and pedagogical practices exhibited by these teachers that have influenced current beliefs and practices associated with culturally responsive teaching (Foster, 1994; Ladson-Billings, 1994; Siddle-Walker, 2001).

### **The Post-Brown Era**

Culturally responsive teaching uses cultural knowledge, prior experiences, frames of reference, and performance styles of ethnically diverse students to make learning encounters more relevant and effective for them (Gay, 2000). Furthermore, culturally responsive teaching places students’ cultural and racial identities at the center of instruction and provides a space in which students may engage in meaningful and relevant activities and be involved in experiences that are directly linked to their background experiences. The need to connect students’ prior experiences with new information is critical for students of color and students in impoverished settings. Research has clearly documented the cultural discongruence (Au, 1993) or disconnection experienced by students from traditionally marginalized groups when they enter schools that operate based on a European American norm. This experience, which has also been termed cultural mismatch, represents a long-standing dilemma in America’s public schools that is exacerbated by a lack of cultural translators present to assist in relationship building between students of color and European American educators (Mitchell, 1998).

A review of current relevant research on culturally responsive teaching has indicated that there are certain principles guiding the work of effective teachers of students of color. Five general principles have emerged from the research of scholars who have dedicated a great deal of attention to examining exemplary teachers of students of color: commu-

nity and political activism, high expectations, caring, family and community engagement, and instructional bridge building (Beauboeuf-Lafontant, 1999; Foster, 1994, 2001; Howard, 2002; J. J. Irvine, 1990, 1999; Ladson-Billings, 1994; Stanford, 1997).

1. For African American teachers working in segregated schools, the need for improved training and instruction was essential to carrying out their professional duties to students and their community. Thus, community and political activism can be evidenced through active participation in teacher associations and their fight for racial uplift during and following segregation. Moreover, a commitment to community and political activism is inherent in the current struggle of culturally responsive teachers to remain vigilant to issues such as social justice, democracy, and liberation in the face of high-stakes testing and the overwhelming influence of politics in the education arena.

2. According to Good and Brophy (1994), “teacher expectations involve inferences that teachers make about the future behavior or academic achievement of their students, based on what they know about these students now” (p. 83). During segregation, African American teachers expected their students to be successful, for their success was critical for the uplift of their families, communities, and race. Therefore, culturally responsive teachers articulate and exhibit high expectations for all their students by maintaining a standard of excellence and persistence in spite of conditions that historically have been used to promote deficiency and disability.

3. An essential characteristic of effective teachers of students of color is the presence of caring or “culturally connected caring.” Howard (2002) asserted that culturally connected caring refers to a display of caring behaviors that are exhibited within a cultural context and in a form that is familiar to students. J. J. Irvine (1999) characterized this level of caring as other mothering, which embodies the essence of teaching. “Other mothers” share the responsibility for their students with their families and, consequently, are vested in their success. Caring behaviors include a willingness to be involved in the lives of students outside the classroom, maintaining an open line of communication, accepting the strengths and weaknesses of each child without judgment, and a deep concern for students’ futures.

4. Family and community engagement refers to the relationship that African American teachers in segregated schools established and maintained with African American communities through shared beliefs and values and cultural solidarity. African American teachers of the past lived in the communities where they worked, attended community events, and embraced the elevated status of teachers in the community. This level of engagement can be evidenced in today’s schools through the activation of the funds of knowledge that exist in culturally diverse families and communities (Moll et al., 1992). By developing formal and informal relationships with families and community organizations, educators can provide

opportunities for meaningful engagement, which takes into account the contributions and needs of key stakeholders.

5. Culturally responsive teachers successfully build a bridge between their instruction and the lives of their students through their understanding of learning styles and cultural learning patterns. This information guides their daily instruction and teacher–student interactions. The purpose of instruction for culturally responsive teachers is to promote the emotional, social, physical, and academic development of their students. Therefore, it is critical that instruction is relevant to students’ outside lives and can be used to liberate students and their families. African American teachers in segregated schools had a firm understanding of the challenges that their students would face and used their instruction to promote democratic principles and critical thinking.

The case has been made for a more concerted effort to address issues associated with race and culture in the classroom based on the growing diversity of America’s public schools. From 1986 to 1996, the percentage of African American students in public schools has increased from 16.1% to 16.9%. The proportion of Hispanic students in public schools has increased over the same 10-year period from 10% to 16% (Snyder, 1999). However, the ethnicity of teachers currently in U.S. schools and entering teacher preparation programs remains virtually entirely European American. More than 80% of current teachers are European American and female, and this trend seems to be continuing when examining the racial and ethnic breakdown of individuals entering the teaching profession (American Association of Colleges for Teacher Education, 1989; Tyler, Yzquierdo, Lopez-Reyna, & Flippin, 2004).

One of the assumptions of the *Brown* case was that students of color would enter predominantly White schools and that teachers would be prepared to provide them with the same educational experiences as White students, and consequently these students would experience educational success. We have learned from examining achievement outcomes for students of color that without culturally responsive teacher preparation inclusive of the principles previously discussed in this article, along with schools that support a multicultural infusion in curriculum, professional development, and school reform efforts, students of color will continue to be overrepresented in certain programs in special education and underrepresented in programs for the gifted and talented.

However, the challenge for the field of special education remains in implementing what is known about contextual factors such as race, culture, and poverty and their impact on student performance. With the current debate brewing in schools of education and in political circles over evidence-based practices, scientifically based research, and the implications of implementing culturally responsive teaching with a lack of empirical evidence supporting its effectiveness on student achievement, there seems to be a growing resistance to supporting initiatives that are aimed at ending the “business as

usual” rhetoric currently dominating America’s public schools, particularly those labeled as low performing or in need of improvement.

## CONCLUSIONS

The impact of the *Brown* decision on the field of special education has been far-reaching and lasting. From ability tracking to resegregation in special education, students of color are still waiting for the promise of *Brown* to be realized. The promise of *Brown* lies in the pursuit of equality in educational experiences. In order to fully achieve educational equality for students of color, current school reform initiatives must take into account the historical context that frames every aspect of public schooling. Moreover, contextual factors that influence the teaching and learning process must be taken into consideration when making decisions about curriculum, school structural policies, and teacher development.

Although the *Brown* case has been primarily perceived as a case about access, the underlying message of the decision was that students of color and their European American peers would benefit from integrated schools and, thus, students of color would experience similar gains in academic achievement. However, the logistics of how these gains would be made failed to be articulated by lawmakers, and this failure continues to plague the current performance of students of color, particularly those placed in special education programs, which have only recently been asked to embrace a results-based paradigm for service delivery. Results go beyond simply measuring student performance on standardized assessments or determining mastery. If results have become the primary goal of education and the key indicator of measuring the benefits of access, the lessons of schools of the past have been lost on those of us committed to fulfilling the promise of the *Brown* decision.

Future research devoted to understanding the intersection of multicultural and special education should seek to answer the call for evidence-based practices for students of color based on what is known about the learning styles and cultural patterns of diverse learners. Moreover, there is a need to examine the extent to which teachers’ beliefs and attitudes about students of color affect the instructional practices they elect to use in their classrooms, which consequently influences teachers’ ability to engage students and their families in the education process. Ultimately, positive student outcomes should reflect a reconceptualized understanding of the purpose of education and the role of the teacher in ensuring the development of the whole child. ■

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