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#### ARTICLE

# From Compensation to Accommodation: The History of Learning Disabilities in American Higher Education

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#### Abstract

This article examines the history of learning disabilities (LDs) on college campuses, from the introduction of the concept in the early 1960s to its spread throughout American higher education during the 1990s. At first, colleges offered relatively little assistance and urged students to compensate for their LDs by working harder and adopting recommended study strategies. After legal and institutional pressures compelled faculty members to provide accommodations for greater numbers of students, many professors worried about the legitimacy of the diagnosis and the possible threat to academic standards. While casting a somewhat sympathetic light on these concerns, the article concludes that many elements of this early set of accommodations were eventually regarded as pillars of competent instruction. This history illuminates the complex tension between institutional support and student responsibilities and the murky distinction between individual accommodations and universally-effective teaching.

Keywords: Learning disabilities; accommodations; higher education; universal design for learning

In the early 1970s, a college student with a learning disability (LD) expressed frustration with being "constantly told to be a janitor." Experts informed his family that he had a "good head" but would be unable to earn a bachelor's degree. A few years later, a student with a similar diagnosis asked college staff members to refrain from calling him "stupid" or "lazy." "Whatever you say to me," the student implored, "don't tell me...that I don't have any business being in school, because I can't stand to be told that another time." Both students attended college on the cusp of a new era for people with LDs. Over the course of the next two decades, American institutions of higher education would explore how they might provide a more supportive reception.

<sup>&</sup>lt;sup>1</sup>Gertrude Webb, "The Neurologically Impaired Youth Goes to College," in *Handbook on Learning Disabilities*, ed. Robert Weber (Englewood Cliffs, NJ: Prentice Hall, 1974), 244.

<sup>&</sup>lt;sup>2</sup>C. Dean Miller, Donna McKinley, and Michael Ryan, "College Students: Learning Disabilities and Services," *The Personnel and Guidance Journal* 58, no. 3 (Nov. 1979), 155.

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The number of college students with LDs increased at a remarkable pace in this era. The term "learning disability" was coined in the early 1960s and became the largest federally-recognized category of disability in elementary and secondary schools by the 1980s, at which point the label was applied to half of all students who received special education services. In response to pressure from students, parents, and advocates, Congress passed the Rehabilitation Act of 1973, which (in Section 504) outlawed discrimination against individuals with disabilities by any federally funded institution. Two years later, Congress passed the Education for All Handicapped Children Act of 1975, which required schools to expand access to college-preparatory curricula. In the wake of these laws, the number of college students with LDs surged from a handful per campus during the early 1970s to 9 percent of enrollment in 1994. LDs became the most-common type of disability at American colleges and universities, accounting for 40 percent of all first-year students who received accommodations in the 1990s.

Emboldened by their more encouraging experiences in high school and their new legal rights, this population presented challenges for colleges and universities – institutions that were traditionally disinclined to make adjustments in response to student needs. As stated by a training manual for professors, either students with LDs would have to adapt to existing standards with some modest assistance from tutors, or colleges would need to adapt their instructional practices and program requirements. Initially, the first option seemed more likely, especially at elite colleges and universities. Students with LDs were told to work harder, while many faculty members questioned the extent to which they should alter their teaching methods or course policies. Some professors expressed misgivings about the science behind these diagnoses, while others worried about the appropriateness of revising their traditional approaches to teaching. Many faculty members doubted if the official guidance about how to support students with LDs would prove to be helpful to this population or any other students in the long run.

After providing an overview of the increase of students with LDs at American institutions of higher education, this article documents the reception of this first wave – a cohort that was expected to find ways to succeed while receiving relatively little assistance in the 1970s and early 1980s. Next, the article surveys several explanations for

<sup>&</sup>lt;sup>3</sup>Robert L. Osgood, *The History of Special Education: A Struggle for Equality in American Public Schools* (Westport, CT: Praeger 2007), 112; James G. Carrier, *Learning Disability: Social Class and the Construction of Inequality in America* (New York: Greenwood Press, 1986), 2.

<sup>&</sup>lt;sup>4</sup>Osgood, The History of Special Education, 117.

<sup>&</sup>lt;sup>5</sup>Joseph W. Madaus, "The History of Disability Services in Higher Education," New Directions in Higher Education 154 (Summer 2011), 9; Cathy Henderson, College Freshmen with Disabilities (Washington, DC: American Council on Education, 1995), 6–8.

<sup>&</sup>lt;sup>6</sup>Cathy Henderson, College Freshmen with Disabilities (Washington, DC: ACE, 2001), 5.

<sup>&</sup>lt;sup>7</sup>Well into the twentieth century, for example, most colleges took it for granted that large numbers of students would struggle with coursework and drop out within their first two years. R.L. Duffus, *Democracy Enters The College: A Study of the Rise and Decline of the Academic Lockstep* (New York: Scribners, 1936), 178.

<sup>&</sup>lt;sup>8</sup>Martha Wille Gregory, *How To Provide Accommodations for Students with Learning Disabilities* (Columbia, MO: University of Missouri, 1994), 14–15.

the faculty backlash that occurred during the late 1980s and 1990s, when the institutional response to LDs became increasingly legalistic and focused on accommodations. Finally, the article observes that many of the course accommodations recommended in these decades eventually appeared to be best practices for all rather than adjustments made for the benefit of a select group.

Whereas the discourse around learning disabilities sometimes devolves into acrimonious debate between skeptics and advocates of accommodations, this article proposes a way out of that impasse. The history of LDs suggests that we might be able to encourage college students to take greater responsibility for their learning without demoralizing them or violating their rights. While casting a somewhat sympathetic light on the concerns voiced by many professors, this history also encourages faculty members to approach the subject of accommodations with care and humility. As illustrated by the initial era of LDs, instructional practices that might seem like special exceptions or threats to academic standards may be later regarded as pillars of competent teaching.

## Historiography

Despite the rapid spread of accommodations during the past half-century, there are no articles or monographs that focus on the history of college students with LDs. Historical accounts of students with disabilities on college campuses concentrate primarily on physical accessibility and rarely extend beyond the 1970s. Meanwhile, scholars who examine the history of LDs almost exclusively examine preK-12 students or/and tend to emphasize the technical evolution of the diagnosis.

More broadly, the robust and far-ranging interdisciplinary field of disability studies regularly examines school contexts. <sup>12</sup> By reframing disability as a socio-political construct akin to and intersecting with other facets of identity, this research community has demonstrated how the concept can undergird racial, socioeconomic, and gender-based oppression. <sup>13</sup> The field asserts that the capacity of people with disabilities is not

<sup>&</sup>lt;sup>9</sup>Jason Ellis and Kate Rousmaniere, "Professor Bailyn, Meet Professor Baynton: The "New Disability History" of Education," *History of Education Quarterly* 60, no. 3 (Aug. 2020), 285–94.

<sup>&</sup>lt;sup>10</sup>Richard J. Altenbaugh, "Where are the Disabled in the History of Education? The Impact of Polio on Sites of Learning," *History of Education* 35 (Nov. 2006), 705–30; Scot Danforth, "Becoming the Rolling Quads: Disability Politics at the University of California, Berkeley, in the 1960s," *History of Education Quarterly* 58, no. 4 (Nov. 2018), 506–36.

<sup>&</sup>lt;sup>11</sup>See for example, Barry M. Franklin, *From Backwardness to At-Risk: Childhood Learning Difficulties and the Contradictions of School Reform* (Albany: State University of New York Press, 1994); Daniel P. Hallahan and Cecil D. Mercer, "Learning Disabilities: Historical Perspectives," Paper presented at the Learning Disabilities Summit in Washington, DC, Aug. 27-28, 2001, ERIC Number: ED458756.

<sup>&</sup>lt;sup>12</sup>D. Kim Reid and Michelle G. Knight, "Disability Justifies Exclusion of Minority Students: A Critical History Grounded in Disability Studies," *Educational Researcher* 35, no. 6 (Aug.-Sept., 2006), 18.

<sup>&</sup>lt;sup>13</sup>Douglas C. Baynton, "Disability and the Justification of Inequality in American History," in Paul Longmore and Lori Umansky, eds. *The New Disability History: American Perspectives* (New York: New York University Press, 2001), 33–57; Kate Rousmaniere, "Those Who Can't, Teach: The Disabling History of American Educators," *History of Education Quarterly* 5, no. 1 (Feb. 2013), 92; Subini Ancy Annamma, David Connor, and Beth Ferri, "Dis/ability Critical Race Studies (DisCrit)," *Race Ethnicity and Education* 16, no. 1 (Jan. 2013), 1–31.

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limited primarily by medical factors, but rather by the ignorance and insensitivity of the dominant culture.14

This article's focus on college students yields some findings that are similar to core tenets of disability studies. The story of LDs in higher education reinforces the field's emphasis on the lack of institutional support for people with disabilities, the importance of centering the perspectives of those who experience disability, the fluid socially-constructed nature of disability, and the all-too-frequent irritation expressed by "able-bodied" people toward various accommodations. Like individuals with other types of disabilities who achieve conventional forms of success, the first generation of college students with LDs were also lauded for being able to "compensate" - a form of praise that can reduce the pressure for social reform. Finally, as highlighted toward the end of this article, the history of LDs at the college level illustrates the manner in which inclusive institutional responses can ultimately benefit people with all types of bodies.15

Yet the history of college students with LDs also diverges from some other common narratives of disability studies. First, the perspectives of privileged able-bodied gatekeepers, whose views are often (and understandably) critiqued by the field, seem worthy of especially careful consideration in this context. LDs raise questions about subjects (such as the line between assignments that reside at the core of a discipline and those that may be modified) that are closely connected to the academic expertise of faculty members. Thus this article takes their views seriously despite the tendency of professors to express themselves in ways that can seem arrogant or unnecessarily harsh. Second, college students and the category of LD both enjoy higher status than preK-12 students and people experiencing many other varieties of disability. Scholars typically regard LDs as a concept that was created to describe the academic struggles of financially-secure White students. Perhaps as a result, LDs tend to be seen by laypersons as pedagogical in nature, whereas visible developmental or physical disabilities are more commonly described with deficit-oriented language. 16

In part due to these relatively privileged origins, this article draws much of its archival material from prestigious institutions. Currently, selective campuses have the highest rates of classroom accommodations, with roughly 25 percent of the studentbody at some schools receiving disability letters - four times greater than the average rate at community colleges.<sup>17</sup> Faculty and staff at elite institutions have also been particularly vocal regarding their concerns about LDs, perhaps due to their higher scholastic expectations, as defined in traditional terms, and because their school missions do not focus on providing support for struggling students. In general, these manuscript sources provide an unvarnished portrait of reactions to the initial influx of

 $<sup>^{14}</sup>$ Paul Longmore and Lauri Umansky, "Disability History: From the Margins to the Mainstream," in *The* New Disability History, eds. Longmore and Umansky, 7-11; Catherine J. Kudlick, "Disability History: Why We Need Another 'Other" The American Historical Review 108, no. 3 (June 2003), 763-93.

<sup>&</sup>lt;sup>15</sup>Lennard J. Davis, ed., *The Disability Studies Reader*, 5th ed. (New York: Routledge, 2017).

<sup>&</sup>lt;sup>16</sup>Margaret A. Winzer, The History of Special Education (Washington, DC: Gallaudet University Press,

<sup>&</sup>lt;sup>17</sup>Robert Weis and Sophie Bittner, "College Students' Access to Academic Accommodations Over Time," Psychological Injury and Law 15, no. 3 (2022), 236-52.

college students with LDs. Compared to today, professors and administrators between the 1970s and 1990s faced milder legal, social, and professional consequences if they expressed doubts about accommodations. Despite the victories of the disability rights movement and the work of disability studies scholars, LDs were still largely viewed as challenges to be faced by individuals rather than as a social phenomenon that warranted institutional change. <sup>18</sup>

#### Learning Disabilities in American Higher Education, 1970s-1990s

During the 1960s, the concept of LDs superseded older terms such as "backward," "perceptually handicapped," or "brain injured." Policymakers began paying attention to the rapid increase of this diagnosis, while parents and students founded advocacy groups and lobbied for expanded services within schools. Passearchers discovered that even students with exceptional aptitude could nevertheless struggle due to perceptual challenges. For example, a student at Brown University reported that she took inadequate lecture notes because the concepts became "confused between the hearing and the writing." The University of Wisconsin alerted professors that new information could seem like "a fuzzy TV picture" to these students. By the 1980s, specialists understood that some students with LDs were able to cope independently with the demands of high school work but could become overwhelmed with the volume of information and the lack of individual attention that characterized typical college courses.

In 1980, a national committee sought to inform faculty members that students with LDs were still capable of learning and only struggled due to their different ways of processing information. According to researchers, students with LDs were "smarter" than their performance indicated and could succeed with proper support. Students embraced this interpretation. The Boston College (BC) campus newspaper reported that students were relieved to learn their difficulties were "not due to laziness or even stupidity." This new perspective prompted one applicant to stop being "a closet LD

<sup>&</sup>lt;sup>18</sup>Altenbaugh, "Where are the Disabled in the History of Education," 708.

<sup>&</sup>lt;sup>19</sup>Hallahan and Mercer, "Learning Disabilities," 3.

<sup>&</sup>lt;sup>20</sup>The diagnosis ruled out discrepancies caused by social circumstances, emotional disturbance, or low-quality schooling. Joan Shapiro and Rebecca Rich, *Facing Learning Disabilities in the Adult Years* (New York: Oxford University Press, 1999), 11, 15.

<sup>&</sup>lt;sup>21</sup>Katherine Hines, "Dyslexics at Brown," folder: LDs, 1986-88, box 126, Trinity College of Arts and Sciences, Office of the Dean records, UA.25.02.0001, Duke University Archives, Durham, NC (hereafter DUOD records).

<sup>&</sup>lt;sup>22</sup>College Students with LDs, University of Wisconsin System (1983), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>23</sup>Joanne McAllister, "Learning Disabilities Testing Done at BC," *The Heights (Boston College)*, Sept. 23, 1985, 7; Hines, "Dyslexics at Brown," 26.

<sup>&</sup>lt;sup>24</sup>Lynn M. Smith, *The College Student with a Disability* (Washington, DC: President's Committee on Employment of the Handicapped, 1980), 12.

<sup>&</sup>lt;sup>25</sup>Jeanne Chall, "Implications of Theories and Research Findings for Instruction and Accommodation of Learning Disabled College Students" in *Instructing Students with Learning Disabilities*, ed. Dolores Perin (New York: City University of New York. 1990), 15.

<sup>&</sup>lt;sup>26</sup>McAllister, "Learning Disabilities Testing Done at BC," 7.

student" and start discussing their diagnosis with peers and professors.<sup>27</sup> A member of DePaul University's class of 1985 experienced a profound boost to her self-confidence after she was diagnosed.<sup>28</sup> A Dartmouth student recalled that discovering his LD felt "like a Volvo lifted off my chest," while a classmate said that it was "the second best news I ever got (the best was when I was accepted to Dartmouth)."<sup>29</sup>

The LD label was attractive to students because the diagnosis affirmed, by definition, that they possessed at least average intelligence. Students with LDs mostly just needed more effective instruction, more time to process information, and more intentional study strategies. According to a student at the University of California, Davis, "we're not slow—we're just slow."30 The first chapter of a guide for parents of children with LDs was titled "Bright but Dumb" and assured readers that "disabilities do not impair intelligence."31 As early as 1969, a doctor described a college student as "thoroughly educable" despite her struggles with reading and spelling. 32 That same year, a professor of psychiatry noted that Albert Einstein had difficulty with elements of his formal education and informed a dean that students with LDs could produce college-level work.<sup>33</sup> William Cruickshank, a leading scholar in the field, recognized the importance of these "positive connotations." Although he believed that it was a mistake to assign the label only to students with average or above average intelligence (noting that children with substantial developmental disabilities could also have LDs), Cruickshank understood that this perception explained why parents founded the Association for Children with Learning Disabilities in 1964, soon after scholars introduced the term.<sup>34</sup>

White middle class and upper class parents were particularly attracted to this terminology and advocated for its adoption within schools and legislatures in subsequent decades. <sup>35</sup> Whereas these parents might have felt comfortable with other labels being

 $<sup>^{27}</sup>$ Joanne McAllister, "Learning Disabled Student Shares His Experiences and Struggles," Sept. 23, 1985, *The Heights*, 7.

<sup>&</sup>lt;sup>28</sup>Carol Wren and Laura Segal, College Students with Learning Disabilities (Chicago: DePaul University, 1985), 18.

<sup>&</sup>lt;sup>29</sup>"Like a Volvo Lifted Off My Chest," *The Undergraduate Bulletin* (Jan. 1986), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>30</sup>Larry N. Vanderhoef, *Indelibly Davis: A Quarter-Century of UC Davis Stories...And Backstories* (Davis, CA: University of California, 2015), 143.

<sup>&</sup>lt;sup>31</sup>Milton Brutten, Sylvia O. Richardson, and Charles Mangel, *Something's Wrong with My Child* (New York: Harcourt Brace Jovanovich, 1973), 1.

<sup>&</sup>lt;sup>32</sup>Edwin Cole to Virginia Bryan, Nov. 25, 1969, folder: LD Correspondence, 1969-70, box 15, DUOD records.

 $<sup>^{33}</sup> Lloyd$  Thompson to Virginia Bryan, Nov. 6, 1969, folder: LD Correspondence, 1969-70, box 15, DUOD records.

<sup>&</sup>lt;sup>34</sup>William M. Cruickshank, *A Teaching Method for Brain-Injured and Hyperactive Children* (Syracuse, NY: Syracuse University Press, 1961), 3, 8; Franklin, *From Backwardness to At-Risk*, 65. By the 2000s, many experts focused on how students responded to instruction rather than the intelligence/achievement gap. Daniel P. Hallahan, Paige C. Pullen, and Devery Ward, "A Brief History of the Field of Learning Disabilities," in *Handbook of Learning Disabilities*, eds. H. Lee Swanson, Karen R. Harris, and Steve Graham (New York: Guilford Publications, 2013), 27–29. Later renamed as the Learning Disabilities Association of America, the organization lobbied for legislation as well as funding for LD research, services, and professional preparation. "History," Learning Disabilities Association of America, https://ldaamerica.org/about-us/history/.

<sup>&</sup>lt;sup>35</sup>Mark Kelman and Gillian Lester, *Jumping the Queue: An Inquiry into the Legal Treatment of Students with Learning Disabilities* (Cambridge, MA: Harvard University Press, 1997), 4.

applied to children from low-income families or/and children of color, they preferred "learning disabled" for their own children because the concept emphasized the failures of unresponsive schools rather than blaming their parenting or condemning their children to a future constrained by low expectations.<sup>36</sup> As a result, Cruickshank worried that schools might "perpetuate an insidious form of racial discrimination" by referring to struggling White students as learning disabled while continuing to refer to struggling Black students as "mentally retarded." Indeed, wealthier White parents sought LD diagnoses for their children more often than other parents and more frequently requested additional academic support during Individualized Education Program meetings.<sup>38</sup> According to a professor of behavioral pediatrics, LD diagnoses were appealing because grades of B or C had become "unacceptable to the middle class."<sup>39</sup> These parents often wished to retain the label at least until after their children benefited from additional time on their college entrance examinations. 40 A Howard University researcher observed that White middle class parents had been "socialized to be more aggressive" when seeking advantages for their children. 41 In contrast, parents of color and/or parents who immigrated from developing countries seemed more concerned about the stigma that could be associated with LDs. 42 At institutions of higher education, LD diagnoses were also inequitably distributed because college students and their families typically bore the burden of paying for academic and psychological evaluations.43

These inequities are significant because access to services and accommodations encouraged students to aspire to attend college even if they had struggled earlier in their schooling. This phenomenon paralleled an across-the-board increase in college enrollment during the postwar era, when a bachelor's degree became more closely

<sup>&</sup>lt;sup>36</sup>Gerald Coles, *The Learning Mystique: A Critical Look at "Learning Disabilities"* (New York: Pantheon Books, 1987), 194; Carrier, *Learning Disability*, 93-94; Winzer, *The History of Special Education*, 359; Christine E. Sleeter, "Learning Disabilities: The Social Construction of a Special Education Category," *Exceptional Children* 53, no. 1 (Sept. 1986), 46–54.

<sup>&</sup>lt;sup>37</sup>William Cruickshank, Learning Disabilities: A Definitional Statement (1977), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>38</sup>Thomas M. Skrtic and J. Robert Kent, "Rights, Needs, and Capabilities," in *Righting Educational Wrongs: Disability Studies in Law and Education*, eds. Arlene Kanter and Beth Ferri (NY: Syracuse University Press, 2013), 84; Kelman and Lester, *Jumping the Queue*, 88.

<sup>&</sup>lt;sup>39</sup>Ruth Shalit, "Defining Disability Down," *The New Republic*, Aug. 25, 1997, 20.

<sup>&</sup>lt;sup>40</sup>Kelman and Lester, Jumping the Queue, 89-90.

<sup>&</sup>lt;sup>41</sup>Harriet Jackson Scarupa, "Expanding Opportunities For People with Disabilities," *New Directions* (Howard University) 17, no. 3 (Summer 1990), 5.

<sup>&</sup>lt;sup>42</sup>Kelman and Lester, *Jumping the* Queue 86. It should be noted that there is some debate among researchers about whether students of color are underdiagnosed or overdiagnosed. Alfredo J. Artiles, Sherman Dorn and Aydin Bal, "Objects of Protection, Enduring Nodes of Difference: Disability Intersections With "Other" Differences, 1916 to 2016," *Review of Research in Education* 40, (March 2016), 793, 796; Reid and Knight, "Disability Justifies Exclusion of Minority Students," 19; Weis and Bittner, "College Students' Access to Academic Accommodations Over Time," 236–52.

<sup>&</sup>lt;sup>43</sup>Ani B. Satz, "Disability, Vulnerability, and Fragmented Protections," in *Righting Educational Wrongs*, ed. Kanter and Ferri, 280; Jay Timothy Dolmage, *Academic Ableism: Disability and Higher Education* (Ann Arbor: University of Michigan Press, 2017), 23, 80; Reid and Knight, "Disability Justifies Exclusion of Minority Students," 20.

associated with middle-class status.<sup>44</sup> The change also reflected the spread of more inclusive attitudes toward people with disabilities. Beginning in the 1930s, as part of a turn away from Social Darwinism, more Americans regarded individuals with disabilities as inherently worthy and capable of contributing to their communities. World War Two accelerated this trend by encouraging all citizens to find a way of supporting the military effort and by promoting rehabilitation services and workplace adjustments for wounded veterans.<sup>45</sup> When the GI Bill subsidized the enrollment of significant numbers of veterans with disabilities, universities started to provide a variety of now-familiar accommodations, such as readers, note-takers, recorded texts, and quiet testing locations. By the early 1960s, when the concept of LDs was introduced, many institutions of higher education had already established a set of practices that supported the achievement of students with disabilities.<sup>46</sup>

Whereas these supports had initially been implemented on a voluntary basis, the Rehabilitation Act of 1973 banned discrimination against people with disabilities and compelled colleges to invest more heavily in accessibility services. <sup>47</sup> Section 504 of the act prohibited institutions that received federal funding from excluding any "otherwise qualified individual with a disability." <sup>48</sup> After federal officials neglected to issue guidelines, student activists pressured the Carter administration to interpret and enforce the law. <sup>49</sup> Subsequently, judges and legislators defined "otherwise qualified" as being able to meet academic standards when provided with "reasonable accommodations," such as extra time, alternative formatting, revised assessments, and the use of computers or other technological assistance. Institutions were not required to authorize accommodations that altered the "fundamental nature" of an academic program, nor were they required to pay for accommodations that would be financially burdensome. <sup>50</sup> In 1990, the Americans with Disabilities Act (ADA) responded to a spate of lawsuits against colleges and universities by providing further clarification about these responsibilities. <sup>51</sup>

Although experts sometimes disagreed about how to define LDs and occasionally questioned whether accommodations were effective at the college level, formal services were established on most campuses during the 1970s and 1980s.<sup>52</sup> Many of these programs were founded by a single motivated faculty member, typically someone with

<sup>&</sup>lt;sup>44</sup>Earl J. McGrath, ed., *Universal Higher Education* (New York: McGraw-Hill, 1966).

<sup>&</sup>lt;sup>45</sup>Osgood, The History of Special Education, 80–83; Franklin, From Backwardness to At-Risk, 2.

<sup>&</sup>lt;sup>46</sup>Madaus, "The History of Disability Services in Higher Education," 6–8.

<sup>&</sup>lt;sup>47</sup>Shapiro and Rich, Facing Learning Disabilities in the Adult Years, 129.

<sup>&</sup>lt;sup>48</sup>Section 504 of the Rehabilitation Act of 1973, as amended, U.S.C. 794, https://www.govinfo.gov/content/pkg/COMPS-799/pdf/COMPS-799.pdf.

<sup>&</sup>lt;sup>49</sup>Danforth, "Becoming the Rolling Quads," 511.

 $<sup>^{50}</sup>$ Laura Rothstein, "Higher Education and Disability Discrimination: A Fifty Year Retrospective," *Journal of College and University Law* 36 (Aug. 2010), 843–74.

<sup>&</sup>lt;sup>51</sup>Karen Myers, Jaci Jenkins Lindburg, and Danielle Nied, "Allies for Inclusion," *ASHE Higher Education Report* 39 (2013), 17–18.

<sup>&</sup>lt;sup>52</sup>Ron Nelson and Benjamin Lignugaris/Kraft, "Postsecondary Education for Students with Learning Disabilities," *Exceptional Children* 56, no. 3 (Nov. 1989), 246; Charles Hughes and Judith Osgood Smith, "Cognitive and Academic Performance of College Students with Learning Disabilities," *Learning Disability Quarterly* 13, no. 1 (Feb. 1990), 77.

expertise in special education at the elementary or secondary level.<sup>53</sup> Other programs evolved out of centers that provided remediation for all students who needed academic support.<sup>54</sup> Adelphi University, an early leader in the field, began offering a formal program and five-week summer orientation session for students with LDs in 1978.<sup>55</sup> That same year, Kingsborough Community College in Brooklyn used federal funding to open a pioneering LD center that provided tutoring, counseling, audiobooks, and modified examinations.<sup>56</sup>

Despite their lesser commitment to access and remediation, elite institutions eventually followed suit. These schools, like their more-accessible peers, were motivated in part by a desire to improve recruitment and retention as the college-age population declined in the wake of the baby boom.<sup>57</sup> In 1985, for example, Dartmouth University administrators noted that prospective applicants had begun to compare their LD services to those provided by competitors.<sup>58</sup> While working to regularize their procedures, Dartmouth officials discovered that the number of peer institutions with formal LD policies more than doubled between 1986 and 1988.<sup>59</sup> They informed professors that the rights of students with LDs were akin to those with physical disabilities, and explained that these students could struggle "despite continued strong efforts and a high level of motivation."60 Harvard University was one of the highlyselective institutions that created a staff position in this period to coordinate support services and the provision of extra time on assessments.<sup>61</sup> Administrators at Duke University reported that students with LDs were eager to make use of its new services and alternative testing arrangements.<sup>62</sup> Brown University began sending notes to faculty members asking them to notify the dean's office if students showed signs of a LD.63

Perhaps most dramatically, prestigious colleges began to consider if students should be excused from the requirement to study a world language. Because of their emphasis on quick responses and their focus on spelling and grammar, language courses often

<sup>&</sup>lt;sup>53</sup>Susan Vogel, "On Developing LD College Programs," *Journal of Learning Disabilities*, no. 9 (Nov.1982), 519.

<sup>&</sup>lt;sup>54</sup>Rita Sullivan, "Learning Disabilities in College," *Journal of Reading* 19, no. 1 (Oct. 1975), 7.

<sup>&</sup>lt;sup>55</sup>Beth Dempsey, "Program for Disabled Honored," *The Delphian (Adelphi University)*, Feb. 6, 1980; Lora Tortorici, "Learning Disabilities Center Gives Counseling," *The Delphian*, Nov. 17, 1982, 2.

<sup>&</sup>lt;sup>56</sup>Dorothy Siegel, "Help for Learning Disabled College Students," *American Education* 15, no. 6 (July 1979), 17–18.

<sup>&</sup>lt;sup>57</sup>Shapiro and Rich, *Facing Learning Disabilities in the Adult Years*, 126; Simon, "Helping Faculty to Manage Support Services in the Classroom," 14.

<sup>&</sup>lt;sup>58</sup> Alvin Richard to Nancy Pompian, April 30, 1985, folder: LDs Subcommittee, box 10438, Dartmouth Deans records, Series 1374, Dartmouth College Archives, Hanover, NH (hereafter DD records).

<sup>&</sup>lt;sup>59</sup>Subcommittee Report Regarding the Establishment of a Program to Accommodate Students with LDs, Feb. 26, 1986, folder: LDs - DYS Committee, box 10438, DD records; Nancy W. Pompian and Carl P. Thum, "Dyslexic/Learning Disabled Students at Dartmouth College," *Annals of Dyslexia* 38, no. 1 (Jan. 1988), 277.

<sup>&</sup>lt;sup>60</sup>Edward Shanahan to Faculty Members re: General Information on LD Students (n.d.), folder: LDs -DYS Committee, box 10438, DD records.

<sup>&</sup>lt;sup>61</sup>Thomas Crooks to Cole Blease Graham, Oct. 20, 1986, folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>62</sup>Albert Eldridge to Gerald Wilson, March 5, 1987, folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>63</sup>Hines, "Dyslexics at Brown," 26.

posed serious challenges for students with LDs.<sup>64</sup> At Dartmouth, the number of students receiving language waivers increased from 2 in the class of 1985 to 30 in the class of 1991.<sup>65</sup> When a Duke University administrator asked a LD specialist for advice, he replied that language courses could be "impossible" for these students. Noting that Harvard and the University of Massachusetts were exempting students, he editorialized that it would be "a pity for an intelligent young person to be denied higher education because he can't handle a foreign language."<sup>66</sup> Duke officials moved quickly to establish a policy in the spring of 1970 after being notified that several seniors were on the verge of being denied a diploma.<sup>67</sup> Ultimately Duke attempted to prevent this situation from occurring by scrutinizing applicants and encouraging struggling students to transfer, while also establishing a formal exemption process for those who made a good faith effort to pass a language course and had earned satisfactory grades in other subjects.<sup>68</sup>

#### The First Wave: Student Responsibilities and Compensation Strategies

With the exception of these language exemptions, the discourse of learning disabilities from the 1970s through the mid 1980s often emphasized the need for a balance between student responsibilities and faculty adjustments. For example, Curry College started a program that required students with LDs to participate in three hours a week of tutoring, while professors agreed to read exam instructions out loud and accept tape-recorded answers. In some cases, LD program descriptions focused entirely on the additional effort expected of students without mentioning any expectation for faculty to change their practices. Students in Wright State University's program were instructed to demonstrate "independence and motivation" by spending more time on academics than their neurotypical classmates. Northeastern University encouraged students with LDs to focus on their study skills and time management. A demonstration project conducted at San Diego Mesa College featured tutoring and advice about study strategies. At Boston College, faculty members received a chart divided between "What a Student Can Do" (such as previewing materials and reviewing notes

<sup>&</sup>lt;sup>64</sup>Elisabeth Wiig, "The Emerging LD Crisis," *Journal of Rehabilitation* 38, no. 3 (May 1972), 16-17; Hughes and Smith, "Cognitive and Academic Performance of College Students with Learning Disabilities," 75; Leonore Ganschow, Richard Sparks, and James Javorsky, "Foreign Language Learning Difficulties: An Historical Perspective," *Journal of Learning Disabilities* 31, no. 3 (May 1998), 248–58.

<sup>&</sup>lt;sup>65</sup>Barry Scherr to Bruce Duncan, July 22, 1992, folder: ASC Learning Disabilities, box 29803, DD records.
<sup>66</sup>Edwin Cole to Virginia Bryan, Nov.25, 1969, folder: LD Correspondence, 1969-1970, box 15, DUOD records.

 <sup>&</sup>lt;sup>67</sup> James Price to Colleagues, Jan. 21, 1970, folder: LD Correspondence, 1969-70, box 15, DUOD records.
 <sup>68</sup> Ad Hoc Committee on LDs Relating to the Study of Foreign Languages (April 23, 1970), folder: LD Correspondence, 1969-70, box 15, DUOD records.

<sup>&</sup>lt;sup>69</sup>Richard Ugland and Gail Duane, Serving Students with Specific Learning Disabilities in Higher Education (St. Paul: Minnesota Higher Education Coordinating Commission, 1976), 2.

<sup>&</sup>lt;sup>70</sup>Marlene Bireley and Eleyse Manley. "The Learning Disabled Student in a College Environment," *Journal of Learning Disabilities* 13, no. 1 (Jan. 1980), 9.

<sup>&</sup>lt;sup>71</sup>Dean Bork to Vice President Curry, Dec. 17, 1985, folder 5, box 3, Division of Student Affairs records, A084, Northeastern University Archives, Boston, MA (hereafter NUSA records).

<sup>&</sup>lt;sup>72</sup>William Anderson, Rhona Hartman, and Martha Ross Redden, *Federally Funded Programs for Disabled Students: Models for Postsecondary Campuses* (Washington, DC: United States Department of Education, 1981).

with a classmate) and "What a Professor Can Do" (such as giving extra time).<sup>73</sup> After attending a workshop at Central Washington University, a faculty member observed that professors should offer accommodations, but students with LDs must "accept and manage the extra work their burden imposes."<sup>74</sup> In a pamphlet that members of Brown University's dyslexic student organization produced for the benefit of their classmates and professors, the group provided advice about sleep, scheduling, studying, and notetaking.<sup>75</sup>

The advice offered to faculty about LDs in this early era often highlighted the benefits of fostering greater independence among students. A consulting firm promised Northeastern University that its services could promote "self-sufficiency." A staff member at the University of Wisconsin-Whitewater believed that professors who were "overprotective and patronizing" were just as much of a problem as those who sought to exclude students with LDs. Another LD specialist encouraged faculty members to look for ways in which students could meet their own needs "rather than for ways in which my staff can meet them or instructors can accommodate them." In 1987, a guide written for LD students advised that "success in college depends on your ability to take responsibility for your learning." Similarly, *Lovejoy's College Guide for the Learning Disabled* reassured students that they could succeed in college as long as they developed "coping skills" and sought out tutoring. The guidebook recommended using mnemonics when memorizing material and studying in frequent short bursts. In the success of the contraction of the success o

Some students internalized this message. After wishing that professors would be more cooperative, a student at Brown still concluded that the university should not "help dyslexic students too much" because they "don't want to be carried." A Dartmouth dean agreed that students with LDs "emphatically...don't want to be pampered." A Depaul student reported that the role of professors was to present information and that it was her responsibility "to take home material presented in class and learn it in my unique style." Another student expressed gratitude to a staff member

<sup>&</sup>lt;sup>73</sup>Guidelines for Professors of Students with LDs (April 1980), folder 3, box 59, Academic Vice President and Dean of Faculties' Office records, BC-1999-065, Boston College Archives, Boston, MA.

<sup>&</sup>lt;sup>74</sup>John Herum, *A College Professor as a Reluctant Learner* (Ellensburg, WA: Central Washington University, 1982), 9.

<sup>&</sup>lt;sup>75</sup>Dyslexics at Brown (1985), folder: LDs, 1986-88, box 126, DUOD records.

Comprehensive Service Delivery for the Learning Disabled (Jan. 1986), folder 4, box 3, NUSA records.
 Breaking the Barriers, University of Wisconsin-Whitewater (n.d.), folder: LDs, 1986-88, box 126,

<sup>&</sup>lt;sup>78</sup>George Vincent Goodin and Sam Goodin, "Establishing Dialogue: An English Professor and a DSS Coordinator Discuss Academic Adjustments" (Part 2), *Journal of Postsecondary Education and Disability* 6, no. 3 (Summer 1988), 22.

<sup>&</sup>lt;sup>79</sup>John P. Branson, *A Guide to Higher Education for Learning Disabled Students* (Coatesville, PA: Chester County Intermediate Unit, 1987), 16.

<sup>&</sup>lt;sup>80</sup>Charles Straughn II and Marvelle Colby, *Lovejoy's College Guide for the Learning Disabled* (New York: Monarch Press, 1985), xvi, 13–14.

<sup>&</sup>lt;sup>81</sup>Hines, "Dyslexics at Brown," 26.

<sup>&</sup>lt;sup>82</sup>Alvin Richard to Nancy Pompian, April 30, 1985, folder: LDs Subcommittee, box 10438, DD records.

<sup>&</sup>lt;sup>83</sup>Wren and Segal, College Students with Learning Disabilities, 18.

who "pointed out to me exactly what my weaknesses were." Once equipped with this information, the student felt she was able to "compensate and improve."84

Occasionally this emphasis on the responsibilities of students with LDs led to the perception that they were (or should be) superior to other classmates. In the 1960s, one researcher observed that the dyslexia label could "act as a spur to achievement."85 A decade later, a professor in Curry College's LD program expressed a preference for working with these students because "they really mean business."86 Dartmouth University staff members praised students with LDs for learning to "to compensate for it" rather than asking for "special conditions." They noted that these students tended to arrive at college with strong time management skills, effective study strategies, and the confidence to ask questions.<sup>87</sup> A Dartmouth dean marveled at "the clever compensatory techniques, some time consuming, they use to read or do mathematics."88 Another staff member assured students with LDs that they would be attractive to employers because they "worked harder than others." Similarly, Stanford University administrators believed that students with LDs were able to succeed because of their "determination, strength of character, and attitude toward life." A Brown University student boasted that students with LDs did not need untimed exams, but rather "discipline – a lot of discipline."91 Although there are benefits of stressing the assets possessed by many students with LDs, these characterizations run the risk of promoting a problematic "supercrip" stereotype that highlights individuals who possess an extraordinary ability to overcome challenges while overlooking the socially-constructed nature of those barriers.92

### The Backlash: Faculty Concerns about Accommodations

It is possible that this early emphasis on work ethic and independence was intended in part to minimize objections from faculty who were being asked to make adjustments. Indeed, one guide for new LD programs encouraged colleges to start by recruiting high-scoring students in order to increase the likelihood of winning over reluctant professors.<sup>93</sup> Perhaps as a result of these perceptions, the majority of faculty members in

<sup>&</sup>lt;sup>84</sup>Pamela Adelman and Susan Vogel, "College Graduates with Learning Disabilities," *Learning Disability Quarterly* 13, no. 3 (Summer 1990), 161.

<sup>&</sup>lt;sup>85</sup>Margaret Rawson, Developmental Language Disability (Baltimore: Johns Hopkins University Press, 1968), 76.

<sup>&</sup>lt;sup>86</sup>Webb, "The Neurologically Impaired Youth Goes to College," 252–54.

<sup>&</sup>lt;sup>87</sup>Nancy Pompiam to Cole Blease Graham, Oct. 10, 1986 & Oct. 24, 1986, folder: LDs, 1986-88, box 126, DUOD records; Pompian and Thum, "Dyslexic/Learning Disabled Students At Dartmouth College," 278.

<sup>&</sup>lt;sup>88</sup>Alvin Richard to Nancy Pompian, April 30, 1985, folder: LDs Subcommittee, box 10438, DD records.

<sup>&</sup>lt;sup>89</sup>Nancy Pompian to Dyslexia-Learning-Disabilities, Dec. 4, 1992, folder: ASC LDs, box 29803, DD records.

<sup>&</sup>lt;sup>90</sup>Stanford Policy on Students with LDs (July 1986), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>91</sup>Dyslexics at Brown: A Student Experience (1985), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>92</sup>Sharon Barnartt and Richard Scotch, *Disability Protests: Contentious Politics*, 1970-1999 (Washington, DC: Gallaudet University Press, 2001), 46.

 $<sup>^{93} {\</sup>rm Charles\ Mangrum\ II}$  and Stephen Strichart, College and the Learning Disabled Student (New York: Grune and Stratton, 1984), 43.

the early 1980s accepted accommodations such as recorded lectures, additional time on exams, and the occasional alternative assessment.  $^{94}$ 

Yet despite the relatively unobtrusive nature of these efforts (or perhaps due to the perception that LDs did not warrant substantial adjustments from professors), some college students with LDs felt unwelcome on campus even during the less-contentious initial period of the early 1970s through the mid-1980s. First, they encountered skeptical professors who knew very little about LDs and had little inclination to reconsider why some students might struggle in their courses. Leaders of a project at three Minnesota community colleges found that only a third of instructors felt that students with LDs could succeed.<sup>95</sup> The comments section of a survey of Northeastern University (NU) faculty exposed a number of "hostile and angry" sentiments. 96 The coordinator of a national research project noted that faculty's "attitudinal barriers" could be more challenging than the work of making campuses physically accessible.97 The Director of LD Support Services at Boston University encouraged new students to ask older classmates to share their "war stories" about seeking accommodations from skeptical faculty members.98 A guide written for students felt it was important to warn that they "should be prepared to encounter disbelief on the part of the professor."99 Indeed, students with LDs at the University of Wisconsin expressed frustration about needing to prove that their struggles could be "as handicapping as paraplegia."100 A director of disability services recalled that faculty members who were asked to provide accommodations occasionally exclaimed "you've got to be kidding."101 Rather than making these adjustments, some professors asked if students who could not independently strategize around their LDs should attend college. 102

These questions were raised more frequently during the late 1980s and 1990s, especially at highly-selective schools. By 1988, it was common for Dartmouth faculty to ask how it was possible for students with LDs to be admitted, a tendency that left advocates feeling "beleaguered, misunderstood, and frustrated." While some Dartmouth professors seemed sympathetic, others made students feel "stupid or dumb" or as if they were "looked upon as lepers." At Johns Hopkins University, a dean who supervised LD services calculated that his staff spent roughly half of their time trying to persuade

<sup>&</sup>lt;sup>94</sup>Nelson and Lignugaris/Kraft, "Postsecondary Education for Students with Learning Disabilities," 262.

<sup>&</sup>lt;sup>95</sup>Ugland and Duane, Serving Students with Specific Learning Disabilities in Higher Education, 18, 42.

<sup>&</sup>lt;sup>96</sup>Minutes of the Sept. 19, 1980 meeting, box 1, folder 24, NUSA records.

<sup>&</sup>lt;sup>97</sup>Smith, The College Student with a Disability, 2.

<sup>&</sup>lt;sup>98</sup>Loring C. Brinckerhoff, "Self-Advocacy: A Critical Skill for College Students with Learning Disabilities," *Family and Community Health* 16, no. 3 (Oct. 1993), 28.

<sup>&</sup>lt;sup>99</sup>Branson, A Guide to Higher Education for Learning Disabled Students, 16.

<sup>&</sup>lt;sup>100</sup>College Students with LDs, Board of Regents of the University of Wisconsin System (1983), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>101</sup>Andrew Lucchesi, Accessing Academe, Disabling The Curriculum (PhD Diss., CUNY, 2016), 106.

<sup>&</sup>lt;sup>102</sup>George Vincent Goodin and Sam Goodin, "Establishing Dialogue: An English Professor and a DSS Coordinator Discuss Academic Adjustments" (Part 1), *Journal of Postsecondary Education and Disability* 6, no. 2 (Spring 1988), 17.

<sup>&</sup>lt;sup>103</sup>Pompian and Thum, "Dyslexic/Learning Disabled Students At Dartmouth College," 281.

 $<sup>^{104\</sup>text{\tiny s}}$  Dartmouth is Sensitized to Disabilities" (undated newspaper clipping circa 1985), folder, LDs Subcommittee, box 10438, DD records.

faculty to be more responsive. <sup>105</sup> Despite a decade of advocacy, administrators observed that LDs remained "the least understood of the disabilities affecting postsecondary students." <sup>106</sup> According to Harvard's director of disability services, many faculty members misunderstood the legal concept of "reasonable accommodations" and believed they were being asked to lower their expectations for students who were merely "looking for a shortcut." <sup>107</sup>

Some professors questioned the fundamental proposition that students with LDs could achieve at a high level despite their struggles with reading, writing, or/and listening. Noting that it was not uncommon for professors to "just not know what to make of one of these students," an advocate wished for them to see that a student can produce "sloppy" work that expressed insightful ideas. <sup>108</sup> Instead, professors sometimes assumed that students were "lazy" if they misspelled words. <sup>109</sup> One faculty member complained that most requests for accommodations were "made by and on behalf of the culpably ignorant...or improvident." <sup>110</sup> As late as 1994, a University of Missouri training module was still attempting to educate faculty members about the differences between LDs, motivational challenges, and developmental disabilities. <sup>111</sup>

The extent of this antagonism may reflect the manner in which disabilities can cause uneasiness among able-bodied people by triggering their own fears of dependance and marginalization. These ungenerous sentiments could lead some faculty members to suspect that students were exaggerating their academic challenges to gain an advantage. In Wisconsin, an accessibility handbook even mentioned that some students might be "manipulators." At the University of California, Berkeley, a professor refused to provide extended time for a student he suspected was merely attempting to earn a higher grade. Others, such as a dean at the University of California, Davis, questioned why "stupid people" should be given more time. NU dean worried that students were being harmed by professors who doubted the "legitimacy of their needs and their intellectual capacity. At the Rochester Institution of Technology, tensions ran so high that some support staff referred to professors as "the enemy."

In addition to these problematic responses, a number of other factors contributed to faculty opposition to accommodations. First, some professors simply reacted to the sudden increase in the prevalence of LDs. 118 The rights and services that accompanied

<sup>&</sup>lt;sup>105</sup>Susan Broadbent to Cole Blease Graham, Nov. 11, 1986, folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>106</sup>Breaking the Barriers (n.d.), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>107</sup>Joseph Rosenbloom, "Are Learning Disabilities Being Misused?" *New York Times*, Oct. 19, 1996, https://www.nytimes.com/1996/10/19/IHT-are-learning-disabilities-being-misused.html.

<sup>108</sup> Siegel, "Help for Learning Disabled College Students," 18.

<sup>109</sup> Miller, McKinley, and Ryan, "College Students," 154-55.

<sup>110</sup> Goodin and Goodin, "Establishing Dialogue" (Part 1), 17.

<sup>&</sup>lt;sup>111</sup>Gregory, How To Provide Accommodations for Students with Learning Disabilities, 4–5.

<sup>&</sup>lt;sup>112</sup>Longmore and Umansky, "Disability History," 6–7.

<sup>&</sup>lt;sup>113</sup>Breaking the Barriers (n.d.), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>114</sup>Michael Winerip, "Enrolled as Disabled but Ousted for Refusing Help," New York Times, Aug. 18, 1993, 17.

<sup>&</sup>lt;sup>115</sup>Vanderhoef, *Indelibly Davis*, 143.

<sup>&</sup>lt;sup>116</sup>To Vice President Curry from Dean Bork, Dec. 17, 1985, folder 5, box 3, NUSA records.

<sup>&</sup>lt;sup>117</sup>Fred Wilson, "Strategies for Course Modification," AHSSPPE Bulletin 1 (Winter 1983), 15.

<sup>118</sup> Madaus, "The History of Disability Services in Higher Education," 11.

this phenomenon represented a major shift in collegiate culture – from an environment in which students were expected to sink-or-swim to one in which institutions were expected to take greater responsibility for student performance. According to one reporter, a backlash to the rapid pace of this change during the 1990s was "inevitable." At Brown University, a dean observed that "when the cost goes up, not just financially but in the time it takes faculty, there is a swing in the pendulum." By 1997, faculty members across the country complained about these expectations and requested greater support from administrators.

Some professors resisted accommodations after they realized that the scholarly definition of LDs was unsettled. During the late 1980s, a group of researchers doubted whether LDs were distinct neurological conditions or manifestations of environmental factors. An expert at the National Institute of Child Health and Human Development acknowledged that the term was "ambiguous" and suspected that "the numbers are increasing in part because of misuse." Skeptics asserted that LDs might not be reliably distinguished from "garden variety" academic struggles. The coordinator of disability services at Indiana University acknowledged that he did not know for certain which types of support were appropriate and reported that professors also struggled to reach a consensus. Aware of these debates, the differences in regional evaluation standards, and the variation among students with the same label, some professors raised understandable concerns about the validity of LD diagnoses. Even advocates began to sense a need to "tighten" the process. 126

Aware of this murkiness, faculty members sometimes wondered if wealthier parents and students were exploiting malleable administrators to inflate their grade point averages. <sup>127</sup> It is worth noting that the rise of accommodations for LDs coincided with increasing faculty concerns about the extent to which students had begun to perceive themselves as "consumers" of higher education. <sup>128</sup> The term referred to those who focused primarily on the financial benefits of college and seemed to believe that

<sup>&</sup>lt;sup>119</sup>Stephen Simon, "Helping Faculty to Manage Support Services in the Classroom," National Conference for the Accessible Institution of Higher Education, Boston, MA, July 13-17, 1981), 14.

<sup>120</sup> Shalit, "Defining Disability Down," 21.

<sup>&</sup>lt;sup>121</sup>Tamar Lewin, "College Gets Tougher on Verifying Learning Disabilities of Aid Applicants," *New York Times*, Feb. 13, 1996, A16.

<sup>&</sup>lt;sup>122</sup>Patricia McAlexander, "Learning Disabilities and Faculty Skepticism," *Research and Teaching in Developmental Education* 13, no. 2 (Spring 1997), 127.

<sup>&</sup>lt;sup>123</sup>Rosenbloom, "Are Learning Disabilities Being Misused?"

<sup>&</sup>lt;sup>124</sup>Kelman and Lester, *Jumping the Queue*, 18; Louise Spear-Swerling and Robert Sternberg, *Off Track:* When Poor Readers Become "Learning Disabled" (Boulder, CO: Westview Press, 1996).

<sup>&</sup>lt;sup>125</sup>Sam Goodin, "Academic Adjustment for Students with Learning Disabilities," AHSSPPE Bulletin 2 (Summer 1984), 17.

<sup>&</sup>lt;sup>126</sup>McAlexander, "Learning Disabilities and Faculty Skepticism," 124-27.

<sup>&</sup>lt;sup>127</sup>Wendy M. Williams and Stephen J. Ceci, "Accommodating Learning Disabilities Can Bestow Unfair Advantages," *Chronicle of Higher Education*, Aug. 6, 1999, B4-B5.

<sup>&</sup>lt;sup>128</sup>Critiques of student "consumerism" emerged during the recession of the 1970s, and intensified toward the end of the twentieth century. Joan S. Stark, *The Many Faces of Educational Consumerism* (Lexington, MA: Lexington Books, 1977); David Riesman, *On Higher Education: The Academic Enterprise in an Era of Rising Student Consumerism* (San Francisco: Jossey-Bass, 1980); Stanley Aronowitz, *The Knowledge Factory: Dismantling the Corporate University and Creating True Higher Learning* (Boston: Beacon Press, 2000).

tuition-paying customers should generally be satisfied with their grades and overall experience. <sup>129</sup> In 1997, a Yale University professor of psychology echoed this critique of consumerism by referring to accommodations as a system of "misguided entitlements." <sup>130</sup> Another professor accused students who requested additional support of being spoiled young people "who act as if a college or university existed to train people in negotiating their way to some certification entitling them to a comfortable living." <sup>131</sup> In contrast with earlier messages to faculty members, which often stressed the need for students to improve their study strategies and take advantage of supplementary tutoring, professors began to speculate that LD diagnoses had started to encourage students "to get ahead based on their weaknesses." <sup>132</sup> A dean noted that whereas students used to "compensate" for their academic challenges, students now used their LD as an "excuse." <sup>133</sup> This skepticism may explain why a student reported that "the typical response I get from a faculty member is that everyone has trouble with learning." <sup>134</sup>

Faculty members also raised concerns about whether accommodations would lower academic standards. In terms of their institutions' legal obligations, this concern was misguided. In 1979, the United States Supreme Court ruled that the Rehabilitation Act did not require colleges to educate students who needed "substantial" modifications. In the wake of this decision, the director of a LD program sought to assure professors that accommodations did not mean "lowering your standards." A conference speaker stressed that the law did not instruct professors to "water down" their courses. Another advocate hoped to prevent professors from "bemoaning" the supposed decay of standards. Published in 1983, the first issue of a journal devoted to disabilities in higher education attempted to rebut the perception that accommodations reduced rigor or encouraged "sympathy grades." Likewise, the City University of New York informed faculty members that there was "no need to dilute curriculum or reduce course requirements." Nevertheless, increasing numbers of professors worried that students might use their LDs as excuses for their underachievement or lack of preparation.

<sup>&</sup>lt;sup>129</sup>Eric Gould, *The University in a Corporate Culture* (New Haven: Yale University Press, 2003), 44–47.

<sup>&</sup>lt;sup>130</sup>Robert J. Sternberg, "Extra Credit for Doing Poorly," New York Times, Aug. 25, 1997, A23.

<sup>&</sup>lt;sup>131</sup>Goodin and Goodin, "Establishing Dialogue" (Part 1), 17.

<sup>&</sup>lt;sup>132</sup>Sternberg, "Extra Credit for Doing Poorly," A23.

<sup>&</sup>lt;sup>133</sup>John Kelley, "Labels Like 'Learning Disabled' Are Curses That Serve to Hinder Students' Development," Chronicle of Higher Education, Aug. 16, 1989, B1.

<sup>&</sup>lt;sup>134</sup>Michael West et al. "Beyond Section 504," Exceptional Children 59, no. 5 (March-April 1993), 461.

<sup>&</sup>lt;sup>135</sup>Southeastern Community College v. Frances B. Davis, 442 U.S. 397 (1979).

<sup>&</sup>lt;sup>136</sup>Herum, A College Professor as a Reluctant Learner, 9.

<sup>&</sup>lt;sup>137</sup>Simon, "Helping Faculty to Manage Support Services in the Classroom," 16.

<sup>&</sup>lt;sup>138</sup>Gerald Siegel, "English and the Learning Disabled Student: A Survey of Research," Annual Meeting of the College English Association, Houston, TX, April 15-17, 1982.

<sup>&</sup>lt;sup>139</sup>Wilson, "Strategies for Course Modification for Enhanced Accommodation of Nontraditional Learners," 16–17.

<sup>&</sup>lt;sup>140</sup>Reasonable Accommodations: A Faculty Guide to Teaching College Students with Disabilities (New York: CUNY, 1988). 7

<sup>&</sup>lt;sup>141</sup>Mary Lundeberg and Kaia Svien, "Developing Faculty Understanding of College Students with Learning Disabilities," *Journal of Learning Disabilities* 21, no. 5 (May 1988), 300.

Relatedly, professors suspected that providing accommodations to some students amounted to a disservice to others. A guide for faculty in Wisconsin acknowledged the possibility of providing "unfair advantages" to students with LDs. Northeastern University faculty members questioned if students were still "expected to compete on an equal basis." In response, administrators sent assurances that accommodations should not amount to "preferential treatment." Still, NU professors asked if it was possible to provide accommodations without decreasing the attention they paid to the rest of their classes. A Brown University dean acknowledged that it could be difficult to identify the line between reasonable accommodations and inappropriate benefits. A University of Missouri faculty manual published in the mid-1990s raised the question of fairness three times while attempting to explain that fair did not necessarily mean equal. A few years later, staff members at the University of Illinois sought to inform faculty members that accommodations were "not advantageous" because they addressed students' struggles with the conventional methods of content delivery and assessment.

Finally, professors expressed concern about how students who received accommodations would fare once they graduated and entered professional workplaces. <sup>150</sup> In this respect, faculty members grappled with one of the fundamental tensions of formal education – whether teachers should seek to model a more compassionate world or focus on preparing students for the less supportive contexts they are likely to encounter outside of school. One professor pointed out that students with speech impediments were unlikely to be hired as radio announcers regardless of how colleges treated them. <sup>151</sup> Another professor warned a student that he would not be able to "manage in the real world" if he depended on additional assistance. <sup>152</sup> Despite the relatively few instances in which jobs require closely-timed performance, the provision of extended time on examinations was a frequent concern among faculty members. <sup>153</sup>

All of these reservations manifested in dramatic fashion within a backlash against LD services at Boston University (BU) in the 1990s. By the start of that decade, BU had built a particularly robust office of disability services. According to the director of Harvard's office, BU operated "the flagship program in the country." <sup>154</sup> Provost Jon Westling, however, believed that the university's efforts had gone too far.

<sup>&</sup>lt;sup>142</sup>Goodin and Goodin, "Establishing Dialogue" (Part 1), 20; Lundeberg and Svien, "Developing Faculty Understanding," 299.

<sup>&</sup>lt;sup>143</sup>Breaking the Barriers (n.d.), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>144</sup>Summary Report of Two Surveys (n.d.), folder 24, box 1, NUSA records.

<sup>&</sup>lt;sup>145</sup>Dear Faculty Member (n.d.), folder 4, box 3, NUSA records.

<sup>&</sup>lt;sup>146</sup>Summary of Comments from Faculty Survey (n.d.), folder 24, box 1, NUSA records.

<sup>&</sup>lt;sup>147</sup>Hines, "Dyslexics at Brown," 26.

<sup>&</sup>lt;sup>148</sup>Gregory, How To Provide Accommodations for Students with Learning Disabilities, 5, 10, 30.

<sup>&</sup>lt;sup>149</sup>Illinois University Urbana Division of Rehabilitation Education Services, *Frequently Asked Questions about Learning Disabilities* (Urbana: University of Illinois, 1998), 6.

<sup>&</sup>lt;sup>150</sup>Sternberg, "Extra Credit for Doing Poorly," A23.

<sup>&</sup>lt;sup>151</sup>Goodin and Goodin, "Establishing Dialogue" (Part 1), 16.

<sup>&</sup>lt;sup>152</sup>West et al. "Beyond Section 504," 461.

<sup>&</sup>lt;sup>153</sup>Shaila Rao and Barbara Gartin, "Attitudes of University Faculty toward Accommodations to Students with Disabilities," *The Journal for Vocational Special Needs Education* 25, nos. 2 & 3 (Winter-Spring 2003), 52.

<sup>&</sup>lt;sup>154</sup>Lewin, "College Gets Tougher on Verifying Learning Disabilities of Aid Applicants," A16.

Westling complained about "somnolent Samantha," a student whose accommodation letter instructed professors to review material if she fell asleep in class. Westling accused BU staff members of accepting virtually any type of documentation and worried about a generation "trained to the trellis of dependency." He concluded that the university's generous approach to accommodations was being abused and informed a concerned parent that BU "too often reinforced disabilities and encouraged dependency." In 1995, Westling cut the disability office's budget, raised diagnostic standards, rejected evaluation paperwork that was more than three years old, and ceased providing waivers for mathematics or world language courses. He took responsibility for reviewing new accommodations and dismissed all but one request that crossed his desk. According to a sympathetic journalist, Westling challenged a system that was generating "a lifelong buffet of perks, special breaks, and procedural protections."

Westling's stint as the head of disability services proved to be short-lived. Outraged students and parents filed suit, accusing BU of violating the Rehabilitation Act and the Americans with Disabilities Act. One parent mourned how the university had regressed from treating students "with humanity and decency" to causing them to feel "hopeless and helpless." At trial, BU's lawyer emphasized the importance of maintaining academic standards – the university would provide extended time and note-takers, but would not "lower the bar." Yet BU's case appeared shaky, especially after Westling admitted that "somnolent Samantha" was a composite figure rather than an actual student. Even before the trial concluded, BU hired a new LD expert, accepted some older diagnoses, and promised to honor all accommodations that had previously been granted. 159 Ultimately the court determined that the university had provided "no concrete evidence that any student faked a learning disability to get out of a course requirement." BU could continue to require world language courses, but was prohibited from asking students to resubmit evidence of their disabilities after their eligibility for services had been determined. 160

#### **Universal Best Practices**

Westling's overreaction notwithstanding, some of these faculty concerns may have been reasonable. However, what stands out most from the history of LDs is how many of the earliest recommendations for how to "accommodate" students have since become common-sense practices for teaching all people.

<sup>&</sup>lt;sup>155</sup>Shalit, "Defining Disability Down," 16.

<sup>&</sup>lt;sup>156</sup>Lewin, "College Gets Tougher on Verifying Learning Disabilities of Aid Applicants," A16.

<sup>&</sup>lt;sup>157</sup>Shalit, "Defining Disability Down," 18.

<sup>&</sup>lt;sup>158</sup>Shalit, "Defining Disability Down," 16.

<sup>&</sup>lt;sup>159</sup>Tamar Lewin, "Fictitious Learning-Disabled Student Is at Center of Lawsuit Against College," *New York Times*, April 8, 1997, B9.

<sup>&</sup>lt;sup>160</sup>Elizabeth Guckenberger et al. v. Boston University and Jon Westling, John Silber and Craig Klafter, 957 F. Supp. 306 (D. Mass. 1997); Guckenberger v. Boston University, 974 F. Supp. 106 (D. Mass. 1997); Jeffrey Selingo, "Judge Says Boston U. Violated Rights of Learning Disabled," Chronicle of Higher Education, September 5, 1997, 65-66; Tamar Lewin, "Students Lose On Last Issue In Bias Suit," New York Times, May 31, 1998, 12.

As asserted by current-day proponents of Universal Design for Learning (UDL), most of the strategies included in accommodation letters were just good teaching. UDL started as a movement for architectural accessibility and expanded to focus on schooling in the late 1990s, beginning with preK-12 educators before spreading to higher education. Rather than emphasizing individual accommodations, proponents of UDL encourage teachers to support all students by focusing on multiple means of engagement, multiple ways of communicating information, and multiple methods for students to present their learning. Like much of the early advice for supporting students with LDs, this approach includes a good deal of now-conventional recommendations, such as providing outlines and summarizing main ideas.<sup>161</sup> This phenomenon is consistent with a pillar of disability studies - the contention that disability should not be viewed through a binary framework that distinguishes between "abnormal" people who need extra support and "normal" people who do not. 162 Instead, scholars increasingly portray disability as an "universal" phenomenon experienced by people in a wide array of circumstances that are largely defined by the extent of institutional (non)responsiveness. 163

As requests for accommodations and suggestions for how to teach students with LDs were introduced in the 1970s and 1980s, some professors came to this realization on their own. <sup>164</sup> In 1976, faculty members at three Minnesota colleges recognized that their burgeoning awareness of how to support students with LDs had made them more effective teachers overall. <sup>165</sup> Similarly, a disability services administrator at a New York City community college observed that professors often discovered that newly-recommended practices "worked better for many students, not just learning-disabled ones." <sup>166</sup> The fact that so many accommodations (such as untimed tests) could yield higher performance for all students prompted some skeptics of LDs to argue that they amounted to unjustified advantages for a particular population rather than narrowly-targeted techniques that only addressed unusual challenges. <sup>167</sup>

Indeed, as promulgated by the federally-funded Higher Education for Learning Disabled Students (HELDS) project between 1979 and 1982, many of these techniques became a standard part of the gospel preached at centers for teaching and learning across the nation: frequent quizzes and review sessions, small group activities, role plays, and multisensory methods of presenting new information (such as visual aids). <sup>168</sup> First disseminated in 1983, the University of Wisconsin's advice for accommodating students with LDs was even more universal. Professors were instructed to

<sup>&</sup>lt;sup>161</sup>Raymond Orkwis and Kathleen McLane, A Curriculum Every Student Can Use: Design Principles for Student Access (Reston, VA: Council for Exceptional Children, 1998); Sheryl Burgstahler and Rebecca Cory, eds., Universal Design in Higher Education: From Principles to Practice (Cambridge, MA: Harvard Education Press, 2010).

<sup>&</sup>lt;sup>162</sup>Rousmaniere, "Those Who Can't, Teach," 91.

<sup>&</sup>lt;sup>163</sup>Altenbaugh, "Where are the Disabled in the History of Education," 708.

<sup>&</sup>lt;sup>164</sup>Wilson, "Strategies for Course Modification for Enhanced Accommodation of Nontraditional Learners," 15; Simon, "Helping Faculty to Manage Support Services in the Classroom," 16.

<sup>&</sup>lt;sup>165</sup>Ugland and Duane, Serving Students with Specific Learning Disabilities in Higher Education, 12.

<sup>&</sup>lt;sup>166</sup>Siegel, "Help for Learning Disabled College Students," 18.

<sup>&</sup>lt;sup>167</sup>Kelman and Lester, *Jumping the Queue*, 167–73.

<sup>&</sup>lt;sup>168</sup>Mangrum II and Strichart, College and the Learning Disabled Student, 165-69.

distribute a syllabus, provide written directions for assignments, define obscure vocabulary, and organize their lectures so that main points were introduced at the start and summarized at the end. <sup>169</sup> Brown and CUNY also recommended starting lectures with an outline and ending class with a summary. <sup>170</sup> In the words of one English professor, most accommodations were not earth-shattering but rather consisted of "helpful reminders" to "be explicit, be graphic, summarize frequently, and help the students summarize." <sup>171</sup> Writing to his son, who happened to be a disability services administrator, another professor expressed surprise "at how often the issue of accommodations can profitably direct the attention of faculty to better ways of dealing with other students as well." Over the course of the 1980s, for example, this professor started to provide a more detailed syllabus, more frequent essay assignments, and fewer multiple choice exams, while also enacting less severe penalties for missed homework. Some of these adjustments seemed so basic that the professor advised his son to proceed "diplomatically" lest he be perceived as accusing faculty members of being poor teachers. <sup>172</sup>

#### Conclusion

By the 2000s, a consensus about how to respond to LDs had emerged among college professors. Most faculty members supported providing access to lecture notes/slides, reducing the time pressure on tests, and allowing some alternative assessments (such as oral rather than written projects) — a series of accommodations that could arguably promote greater learning and more accurate assessment for students with or without disabilities. Roughly half of college teachers agreed to provide different versions of final exams and to refrain from penalizing students with LDs on account of spelling or grammar.<sup>173</sup>

Still, faculty attitudes about accommodations remain a significant barrier to implementation, with many professors continuing to express concern about providing unfair advantages and questioning if their academic freedom is inappropriately curtailed by instructions from accessibility offices. <sup>174</sup> At highly-selective colleges, in particular, some professors watched with apprehension as the number of students with this documentation tripled during the 2010s. <sup>175</sup> Revisions to the ADA lowered the threshold for the severity of a disability that warranted the attention of accessibility officers. <sup>176</sup> Perhaps fueled by this ongoing transition toward a legal emphasis on student rights and

<sup>&</sup>lt;sup>169</sup>College Students with LDs (1983), folder: LDs, 1986-88, box 126, DUOD records.

<sup>&</sup>lt;sup>170</sup>Dyslexics at Brown (1985), folder: LDs, 1986-88, box 126, DUOD records; *Reasonable Accommodations: A Faculty Guide to Teaching Students with Disabilities* (New York: CUNY, 1988), 8–9.

<sup>&</sup>lt;sup>171</sup>Herum, A College Professor as a Reluctant Learner, 15.

<sup>&</sup>lt;sup>172</sup>Goodin and Goodin, "Establishing Dialogue" (Part 2), 18–19.

<sup>&</sup>lt;sup>173</sup>Rao and Gartin, "Attitudes of University Faculty toward Accommodations," 51; Christopher Murray, Carol Wren and Christopher Keys, "University Faculty Perceptions of Students with Learning Disabilities," *Learning Disability Quarterly* 31, no. 3 (Summer 2008), 105.

<sup>&</sup>lt;sup>174</sup>Wendy Harbour, "Inclusion in K-12 and Higher Education," in *Righting Educational Wrongs: Disability Studies in Law and Education*, eds. Kanter and Ferri, 296.

<sup>&</sup>lt;sup>175</sup>Weis and Bittner, "College Students' Access to Academic Accommodations Over Time," 236–52.

 $<sup>^{176} \</sup>mathrm{Disability}$  Discrimination (US Department of Education), www2.ed.gov/policy/rights/guid/ocr/disability.html.

institutional mandates, colleges appeared to double-down on accommodations while deemphasizing their earlier recommendations regarding how students might be able to "compensate" for their disabilities by taking advantage of tutoring, spending more time on their classes, and honing their study strategies. <sup>177</sup>

It is tempting to dismiss these concerns as the hand-wringing of unsympathetic, uninformed, or entitled professors. However this article has attempted to provide a more complex view of faculty skepticism. LDs involve legitimate professional questions about what is considered reasonable in an academic setting – questions that seem motivated at least in part by an understandable, if perhaps misguided, interest in preserving standards, providing fair treatment, and preparing students for their post-graduate professional lives. Even individuals who devote their careers to providing disability services still debate how to strike the ideal balance between supporting students in the present and preparing them for future employment, when definitions of reasonable accommodations are often less capacious. <sup>178</sup>

Yet in retrospect these concerns appear overblown because so many of the early accommodations for students with LDs are now regarded as practices that benefit all students. These recommended supports can even seem like an indictment of the overall quality of college instruction because they continue to include basic practices such as stating the goal for the class session, highlighting key points, and providing clear written directions. <sup>179</sup> Whereas the provision of extra time remains more controversial, there is reason to believe that untimed or slower-paced assessments for all students will also eventually become conventional wisdom. <sup>180</sup> Thus the increased attention paid to students with LDs prompted (and may continue to prompt) professors to become more intentional teachers overall. <sup>181</sup> The history of LDs in college illuminates these murky distinctions between individual accommodations and effective teaching, as well as the complex tensions between institutional support and student responsibilities. It is possible that the distances between these poles is closer than one might assume.

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<sup>&</sup>lt;sup>177</sup>Colleen Eren, "The Problem with Disabling," *Discourse*, July 13, 2023, https://www.discoursemagazine.com/p/the-problem-with-disabling; Steven Mintz, "How to Avoid Getting Sued," *Inside Higher Ed*, Nov. 14, 2023, https://www.insidehighered.com/opinion/blogs/higher-ed-gamma/2023/11/14/how-avoid-getting-sued-work-classroom.

<sup>&</sup>lt;sup>178</sup>Harbour, "Inclusion in K-12 and Higher Education," 297.

<sup>&</sup>lt;sup>179</sup>Reasonable Accommodations (New York: CUNY, 2014).

<sup>&</sup>lt;sup>180</sup>Adam Grant, "Timed Tests Are Biased Against Your Kids," New York Times, Sept. 20, 2023, A24.

<sup>&</sup>lt;sup>181</sup>Some scholars are concerned that the rise of UDL might minimize the attention paid to the particular identities and forms of discrimination associated with disability. Dolmage, *Academic Ableism*, 132–41.

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