Students With Learning Disabilities in the Foreign Language Learning Environment and the Practice of Exemption

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Abstract: This examination of the literature on foreign, or second, language learning by native English-speaking students with disabilities addresses the benefits of language learning, the practices and policies of language exemption, the perceptions of students and educators regarding those practices, and available resources for supporting students with special needs. It aims to question the policy of granting foreign language exemptions while additionally providing insights for educators into the development of inclusive foreign language learning environments.

Key words: foreign languages, inclusive education, language exemption, learning disabilities, special education

Learning another language presents an opportunity that differs in many respects from learning opportunities in other subject areas. It provides students with the chance to investigate their own native language and culture, compare them with additional languages and cultures, acquire communication skills in another language, critically think about the world they live in, and develop acceptance of others. However, numerous students with disabilities, both within the United States as well as in other English-speaking countries, are exempted from foreign language study solely because they have been diagnosed as having special learning needs. This means that many students with disabilities do not benefit from this educational opportunity, which would seem contradictory to inclusive beliefs. Sparks (2009) called for advocates for students with disabilities to be “consistent with their inclusion philosophy and insist that students classified as [learning disabled] be enrolled in foreign language courses and provided with appropriate teaching methods and instruction accommodations so that they can be successful in these classes” (p. 18).
Enacting such changes is sometimes difficult because administrators, instructors of other subject areas, parents, and even learners may believe that foreign language study is somehow less essential than other curricular subjects and thus students with disabilities can be exempted from graduation requirements. However,

[we cannot deny that every child has the right to become a literate adult. This precept applies as much to L2 [the second language] as to L1 [the first language]. We know that literacy is required for an individual to continue accruing information and to continue developing intellectually. (Bacon, 1998, p. 318)

Furthermore, the Individuals with Disabilities Education Improvement Act (IDEA, 2004) in the United States guarantees free and appropriate public education to all students with disabilities (Section 601, d), which in today’s global environment must include the study of other languages and cultures. Although “people often see students with special needs through a black-and-white lens: either they are special education and limited, or they are regular education and competent. The reality of the situation is of course far more complex” (Evarrs & Knotek, 2006, p. 117). Those with special education needs are, under IDEA, guaranteed the right to an appropriate education, which must include foreign language study. The ACTFL, on behalf of its members, echoed this commitment to “developing and maintaining a teaching and learning environment that reflects the broad diversity of American society…” when stating “We believe that all children should have the opportunity to learn other languages and support full access for all students to language programs” (ACTFL, 2012, para. 1). This position statement makes it clear that all students should have the opportunity to become biliterate and bicultural and charges language educators to create rich and appropriate learning environments for all students.

Researchers around the world have called for an investigation into “the barriers at every level of the education system that are inhibiting the spread of language learning and teaching” (Brecht et al., 2013, p. 2). Specifically, Sparks (2009) pointed out that “the most important issue masked by the use of course substitutions and waivers is that special educators and foreign language instructors feel no sense of urgency to develop teaching methods that can be used with at-risk learners” (p. 16). Thus, rather than accepting exclusionary practices, educators, administrators, counselors, learners, and other stakeholders should focus instead on developing and promoting inclusive foreign language learning environments. To that end, this article summarizes research2 that is available in the United States, Canada, and the European Union regarding language learning by students with disabilities.3 Specifically, it reviews the benefits of language learning; explores the policies and practices that would appear contradictory to inclusive educational practices; considers student, parental, and instructor perceptions of foreign language learning by students with disabilities; and addresses specific aspects of foreign language learning that have been determined to be problematic for language learners. The article concludes with suggestions for modifying the curriculum, resources to build inclusive foreign language learning environments, and recommendations for future work.

**Benefits of Language Learning**

It has frequently been necessary to advocate for the role and benefits of foreign language learning. Reagan and Osborn (2002) noted that “of all the academic subjects normally offered in American public schools, no other discipline is asked to defend its existence in the way that foreign language education is routinely challenged” (p. 11). Language learning has value in and of itself as part of the human experience. Reagan and Osborn (2002) argued:

For us, perhaps the most powerful argument for the need for students to study languages other than their own
is that the point of education is to introduce and initiate the individual into our common, human social and cultural heritage, and that this cannot be done adequately without some exposure to the different ways in which human beings, in various times and places, have constructed an amazingly wide variation of languages to meet their needs. If becoming educated is, as many scholars have suggested, the process by which one learns to join in the human conversation, then language skills will inevitably be required if one wishes to join the conversation on anything other than the most trivial level. (p. 12)

In addition, the ACTFL, along with its members, has maintained the position that “language learning meets real world needs” and that by “strengthening their performance [in language learning]… learners become ready for postsecondary education and careers as described in the Common Core State Standards” (ACTFL, 2013, para. 10). Furthermore, language learning “rewards learners with a resume differentiator…, provides access to information and collaboration…, develops critical literacies…, develops flexible and adaptable thinking…,[and] prepares learners to think and interact in a global community” (ACTFL, 2013, para. 1).

Arguments for the benefits of language learning have been rooted in pragmatic, cognitive, and cultural gains. From a pragmatic perspective, increases in national security, benefits to the economy, and better potential employees have often been cited (Reagan & Osborn, 2002). The metacognitive gains include an increased awareness of one’s own language (Le Pichon, de Swart, Vorstman, & van den Bergh, 2010; McColl, 2000a, 2013; Qualifications and Curriculum Authority, 2009; Vygotsky, 1962; Yelland, Pollard, & Mercuri, 1993) and improvement in critical thinking, mental discipline, flexibility, creativity, memory, executive functions, and improved cognitive functioning (Barac & Bialystok, 2012; Bialystok, 2007; Morales, Calvo, & Bialystok, 2013; Poulin-Dubois, Blaye, Coutya, & Bialystok, 2011; Reagan & Osborn, 2002). In terms of cultural gains, the foreign language classroom is an ideal place for discussions on acceptance, helping “students to begin to develop what can be called critical language awareness” (Reagan & Osborn, 2002, p. 103) as well as the opportunity to problem-solve “in a context unavailable in other classes” (Moore, 1995, p. 1). Students have the opportunity to develop socially with a focus on acceptance, raising their awareness as citizens of the world and their home countries (McColl, 2013; Qualifications and Curriculum Authority, 2009).

Interestingly, recent data have shown that a large majority of the American population recognizes the importance of second language learning and supports the enrollment of students in bilingual education (Rivers, Robinson, Harwood, & Brecht, 2013). Furthermore, the ACTFL challenged stakeholders to “educate students [to become] linguistically and culturally equipped … [while envisioning] a future in which ALL students will develop and maintain a proficiency in English and at least one other language” (ACTFL, 2014, para. 6; emphasis in original). Similarly, McColl challenged educators to consider the “advantages they [students] might lose if we deny them the chance to try” (2000a, p. 2) and asked, “[if] we truly believe that language learning has such [benefits to the lives of learners], and that it is the gateway to the acquisition of these values, can we justifiably exclude any of our young people?” (2005, p. 105; emphasis in original).

**Policies and Practices of Language Exemptions**

Although the policies and practices of exempting students from foreign language study are not well researched, the research that does exist, in many instances, has demonstrated that students are often exempted (1) based on personal beliefs and
preferences rather than on the basis of a carefully considered consensus of inclusion, and (2) in the absence of actual data about the potential successes of students with special needs. When instructors, parents, and administrators recommend exemptions, waivers, and substitutions for foreign language learning, they often report that their decisions were based on Modern Language Aptitude Test (MLAT) and IQ testing as well as on assumptions regarding the language abilities of students with learning disabilities. However, it has been demonstrated that IQ and MLAT scores do not accurately predict students' performance in learning another language (Goodman, Freed, & McManus, 1990; Sparks, 2006; Sparks & Javorsky, 2000), nor do students with learning disabilities have more severe foreign language learning problems than their peers solely because of their learning disabilities (Sparks & Javorsky, 2000). In addition, stakeholders' willingness to exempt learners from foreign language instruction may be based on their own language learning experiences, which often emphasized memorization and grammatical analysis (Arries, 1999). Although contemporary, standards-based, proficiency-oriented instruction emphasizes very different goals, these, among other misunderstandings of language acquisition, have been found to hinder the development of inclusive foreign language learning classrooms (Arries, 1999) while perpetuating beliefs among learners, counselors, administrators, parents, and even some language educators that exemptions are necessary. In fact, some educators and researchers are still attempting to classify students as foreign language learning disabled, a classification that may, unfortunately, focus on exempting students rather than on adjusting curricular and instructional practices to meet their needs (Sparks, 2006, 2009).

Language Exemption Policies
In the United States, according to the Rehabilitation Act of 1973, “No otherwise qualified individual with a disability … shall, solely by reason of his or her disability, be excluded from the participation in … any program or activity receiving Federal financial assistance” (Section 794, para. a). However, because what appear to be unsubstantiated beliefs about the capacity of students with special needs to learn a second language are still widely held across a range of stakeholders, both within the school context and among noneducators in society at large, students at the K–12 and postsecondary levels are, in fact, being denied access to foreign language study because of language exemption policies. For example, the policy of allowing exemptions from language study for students with disabilities that is in place in New York State would appear to be doing exactly that: the New York State Diploma Requirements published by the Board of Regents of the State Department of Education (2010) outline the different testing requirements for students with disabilities in subjects such as English language arts, math, global history and geography, science, and U.S. history. In each instance, students with learning disabilities can take a modified exam or the standard exam with the passing score dropped from 65 to 55. However, students who are identified as having a disability “which adversely affects the ability to learn a language may be excused from the Language Other than English requirement” (New York State Education Department, 2010, section b.2.ii.b) and, instead, take courses in other subject areas to make up the credits. In foreign languages, there are no parallel provisions proposed for testing or test scores; rather, the foreign language requirement is deleted from the student’s graduation requirements. Exemption is never considered as an option for other required courses, even if a disability would adversely affect a student’s performance in those content areas. This would appear to be in conflict with the law according to both the Rehabilitation Act of 1973 as well as the No Child Left Behind Act (NCLB, 2008), which positions foreign language as a core
subject area. The exemption, as argued by Wheelden (2001) “is an easy solution that ignores the problem and may deprive the student of important educational experiences” (p. 2).

Additionally problematic is the policy that allows exemption based on the discretion of the school district at the K–12 level in New York State. This means that districts are charged with developing their own criteria through which students with Individualized Education Plans (IEPs) are allowed access into the foreign language classroom and which students are denied such access. For example, at least one district within the state has determined that any student with an IEP that is two standard deviations below the norm in reading for grade level will be exempted from foreign language study (Wight, 2014). The criteria developed by other districts are not well known, nor are they regulated by New York State.4

Language Exemption Practices

The earliest discussion of foreign language exemption and substitution practices in the United States that could be found was Dinklage’s (1971) account of the historical process of language study and exemptions at Harvard University. While writing about aptitude testing for languages, Pimsleur (1968) stated that:

Schools should equip themselves with the best possible means for selecting the correct classes for their pupils, not only in fairness to the majority of pupils, but also out of consideration for those few whose sole chance of excelling academically may lie in their talent for languages. (p. 99)

While it does not explicitly address exemptions, the sentiment seems to make clear that exemptions and the process of removing students from language study were already in place and being questioned in the literature at that time. Freed (1987) published a summary of information from colloquia on the topic of foreign language exemptions in the 1980s. The colloquia attempted to answer questions regarding general learning characteristics of students who had difficulty with foreign language learning, how this should be diagnosed, and what accommodations should be recommended. While Freed offered only a few answers to these questions, her summary served as a starting point for further discussion.

Limited information exists regarding the rates at which students at either the secondary or postsecondary level are exempted from foreign language study; most of the data that do exist have focused on exemptions and substitutions at the postsecondary level throughout the United States. For example, Philips, Ganschow, and Anderson (1991) described how different foreign language substitutions and waivers were implemented at the postsecondary level. In addition, as shown in Table 1, Ganschow, Myer, and Roeger (1989) found that 60% of the respondents in their study required a foreign language in at least one program area and 18% required foreign language studies in all program areas. However, at 74% of the postsecondary institutions from which survey data were received, there was either a formal policy (25.4%) or informal policy (48.4%) for waivers or substitutions of the requirement, with 95% of those institutions either requiring or recommending the identification of a disability before permitting students to waive or substitute an alternative course. Tutoring was offered as the major option for helping students at 74%, while 25% of the respondents noted that students with special needs were accommodated by allowing an individualized learning pace. Only a small number of programs (8%) provided special classes (p. 50).

The author conducted three studies on college guidebooks for students with disabilities (Kravets & Wax, 1991, 2012; Lipkin, 1990) to obtain additional data on foreign language waivers, exemptions, and course substitutions. The first was on Lipkin’s (1990) Guide to College Programs or Services for Students with Disabilities.
| Number of Universities Surveyed Allowed Waivers/Exemptions | Ganschow, Myer & Roeger (1989) | 166 | 74% had formal or informal policies allowing waivers and substitutions | Kravets & Wax (1991) | 157 | Of the 52% surveyed that required foreign language study: 42% had some degrees that allowed waivers; 33% allowed waivers for any degree | Kravets & Wax (2012) | 358 | • 13% allowed waivers in unspecified content areas • 5.5% allowed waivers in foreign language • 5.3% allowed waivers in math • >1% allowed waivers for physical education |
| Allowed Substitutions | 74% had formal or informal policies allowing waivers and substitutions | 74% had formal or informal policies allowing waivers and substitutions | Of the 52% surveyed that required foreign language study: 6% allowed substitutions | • 31% allowed substitutions in unspecified content areas • 37% allowed substitutions in foreign language • 5 universities suggested that students take American Sign Language • 23% allowed substitutions in math • 1% allowed substitutions for physical education |
| Modified Courses | 8% provided modified courses | Of the 52% surveyed that required foreign language study: 1% modified the coursework | >1% of universities reported modified foreign language courses based on student need |
Through an analysis of the information provided by different universities, it was determined that 26% of the 610 universities surveyed offered a foreign language course exemption, modification, or substitution. According to Kravets and Wax’s (1991) survey of 157 universities, of the 52% of universities that required foreign language study for some or all of their degrees, 42% had some degree programs that allowed waivers for language study, 33% allowed waivers for any degree, 6% allowed course substitutions to replace the foreign language requirement, and only 1% reported modifying the foreign language coursework based on students’ needs. Also as shown in Table 1, while the most recent version of Kravets and Wax’s (2012) guide did not specifically ask respondents whether foreign language could be waived or substituted, when asked if they allowed waivers or substitutions for coursework, many institutions specifically listed foreign languages: Of the 358 universities surveyed, 13% allowed waivers in unspecified content areas, which might have included foreign language, and an additional 5.5% specifically stated that they allowed waivers for foreign language study. Thirty-one percent reported allowing substitutions for unspecified content areas, which again may have included foreign language study, and an additional 37% of those surveyed specifically stated that they allowed substitutions in foreign language study. Only 4 of the 358 universities from whom data were received in 2012 reported modifying the language courses based on students’ needs. Thus, while data from the 2012 survey suggested that waivers are being used less frequently than they were in 1991, students are still allowed to substitute other courses for foreign language study, and it appears that few accommodations are being offered.

Because states have the right to set graduation requirements and local school districts also exercise a great deal of control over students’ programs of study and learning experiences, very limited information regarding the rates of exemptions at the elementary or secondary level exists. In order to gain some insight into this issue, the author contacted the New York State Department of Education through a Freedom of Information Law (FOIL) request in February 2014. In the response to this request, it was noted that the rates of exemption for foreign languages were not collected at the state level—nor, for that matter, were data on exemptions from other content areas because students are not allowed to be exempted from any other content area under New York’s state graduation requirements.

All 27 public school districts within two counties in western New York State were contacted concerning their foreign language exemption rates during the 2013–2014 school year, and data were obtained from 11 of them. These 11 public school districts included five in suburban areas and six in rural areas, with a total approximate student population of 35,000 (New York State Education Department, 2014). The average rate of classification under IDEA (2004) of K–12 students for these 11 districts was 12%, with the highest district classifying 17.9% of its students and the lowest classifying 6.1%. The foreign language exemption among K–12 students who were classified as having special needs in these 11 districts averaged 20%. The highest exemption rate was 44%, and the lowest was 14.8%. It must be noted that when the districts provided the number of students classified under IDEA (2004), they included all K–12 students. Since districts may not exempt students from foreign language study until they reach the secondary level, the percentages may be skewed because those elementary students who were included may not yet have gone through the legally required district Council on Special Education meeting that would alter the graduation requirements and thus determine their exemption status, including exemptions for foreign language learning, on their IEP.

Conversations regarding the policies and practices of exempting students from language study are also taking place.
worldwide, particularly in the European Union and Canada. These conversations question current practices and call for better research and insight into the exemption of students with disabilities from this content area (Arnett, 2013; Arnett & Mady, 2010; Bruck, 1978; Dicks & Kristmanson, 2008; European Commission, 2005; Lapkin, MacFarlane, & Vandergrift, 2006; MacKay, 2006; Marsh, 2010; McColl, 2000a, 2000b, 2005, 2013; Qualifications and Curriculum Authority, 2009; Rehorick, Dicks, Kristmanson, & Cogswell, 2006; Training and Development Agency for Schools, 2009; Wilson, 2013; Wise, 2011). Specifically, the European Commission (2005) reported on the practices of language exemptions and concluded that “no groups of young people should be denied access to second language learning because it is in ‘their best interest’” (p. 1). MacKay (2006) pointed out that students with disabilities were routinely encouraged to move out of French immersion programs in Canada, the practice of which would appear to contrast with Bruck’s (1978) findings that often students with language learning disabilities performed as well as their peers in French immersion programs, but at a slower pace. Wise (2011) argued that access to the French programs in Canada should be guaranteed because funding is required to be spent equally so that all students could gain access to the curriculum. Such practices of exemption may serve to perpetuate the idea that language study is not for all learners, when, in fact, it may simply be the case that the teaching methodologies are not meeting the needs of students (Arnett, 2013).

Perceptions of Students, Parents, and Instructors

While the practices and policies of foreign language exemption and use of waivers and substitutions help inform language educators’ understanding, stakeholders’ beliefs, including the perceptions of students, parents, and instructors, also provide meaningful insights. The perceptions of students with learning disabilities on the foreign language learning experience and language requirement are not well documented. Although more than 20 years out of date, Sparks, Ganschow, and Javorsky’s (1993) work compared the perceptions of three groups of students: students with disabilities, students found to be at low risk for difficulties with foreign language learning, and students found to be at high risk for difficulties with foreign language learning. Students’ perceptions were gathered using the Foreign Language Attitude and Perceptions Survey. Not surprisingly, the results demonstrated that students in the low-risk group reported higher estimated foreign language grades as well as more positive attitudes about their academic skills than the other groups. However, both students in the high-risk group and students classified with learning disabilities perceived themselves as lacking the skills that were necessary to learn a foreign language. The most important piece of information gathered from the survey may have been that all three groups expressed the desire to acquire another language, regardless of their perceptions of their own foreign language learning abilities.

Hendry (2009) addressed the way in which the writing skills of students with language learning disabilities developed over time as well as the perceptions of both students and teachers on classroom practices and materials that were used to accommodate students with learning disabilities. She noted, however, that research in this field tends to be problematic because it is often based on MLAT scores as well as focused on “phonology, orthography, syntax, and semantics” (Hendry, 2009, p. 27), suggesting that these components are all there is to language learning and hence disregarding core cultural goals as well as interpersonal, interpretive, and presentation communicative goals that focus on the ability to use language “in meaningful, culturally, and grammatically appropriate ways” (p. 27). She found that students needed help understanding semantics, that many
found decontextualized reading and writing frustrating, and that their limited oral participation was often due to anxiety regarding answering incorrectly. Despite language learning disabilities, data showed that students with language learning disabilities successfully developed their writing abilities and were able to meet, and often exceed, the levels attained by other students. Hendry (2009) recommended that IEPs be revised to be foreign language–specific in order to support language educators in developing an inclusive learning environment.

Parents’ perceptions of foreign language study have also been solicited in order to better understand the potential challenges faced by students with special needs when learning a foreign language. Sparks and Ganschow (1995) found that parents’ insights regarding their students’ abilities, developmental histories, classroom learning characteristics, and previous foreign language learning were helpful in understanding particular needs of individual students. The data obtained from this parent survey, although it is almost 20 years old, correlated with students’ foreign language course grades, foreign language aptitude testing, and first language capabilities. Taken together, these results suggest that parents’ perceptions of students’ developmental and academic abilities could constitute helpful information for foreign language instructors seeking to develop inclusive foreign language learning environments.

Language educators have also been found to believe that “there is a mystique about teaching learners with special needs, and that they would be better taught by those who are familiar with this ‘special’ way of teaching” (McColl, 2005, p. 107). Teachers in MacKay’s (2006) study felt unprepared to meet the needs of all their students. Many teachers “ask how these students were placed in their classes, how they can teach them, and whether or not the students should be given substitutions or waivers of the requirements” (Moore, 1995, p. 1). Educators have also believed that heterogeneous groupings of students, a lack of support from special education services, and a lack of understanding in how to make their course more inclusive also represent obstacles in the path of students’ success (Lapkin et al., 2006; MacKay, 2006; McColl, 2005; Rhodes & Pufahl, 2009). The very limited data on students’, parents’, and instructors’ perceptions suggest that learners with special needs have positive views of the foreign language learning experience, that parents’ insights may help inform foreign language education, and that instructors have felt unsure about how to meet these particular needs.

Developing Inclusive Foreign Language Learning Environments

The available literature on foreign language acquisition by students with disabilities addresses two key topics: the areas of difficulty faced by students with disabilities when acquiring a foreign language and the modifications and accommodations that have been found to be beneficial. It should be pointed out that this literature, as a whole, perpetuates the deficit view of students with disabilities and illustrates the belief that the curriculum is immoveable. It is hoped that, rather than further promoting the deficit perspective, the following suggestions will provide language educators with deeper understandings of potential areas of difficulty faced by all language learners as well as suggest successful modifications and accommodations that can be reflected upon in order to create an inclusive learning environment.

Potential Areas of Difficulty

The existing literature has often focused on the unique challenges and areas of difficulty faced by students with special needs when learning another language. However, it is important to point out that, while students’ difficulties are correlated with their unique
learning needs and overall classification under IDEA (2004), other students within the classroom who are not classified as disabled may, in fact, face the same challenges. Sparks, Ganschow, and Patton (2008) found that learners with learning disabilities and learners with ADHD can succeed in acquiring a foreign language when provided with appropriate support. Furthermore, Sparks and Javorsky (2000) reported that students with learning disabilities did not have more severe foreign language learning problems than their peers solely because of their learning disabilities, and Sparks, Philips, and Javorsky (2003) found that students with both learning disabilities and ADHD did not have more severe challenges in language learning when compared to their peers who were classified as either learning disabled or ADHD. Because data have suggested that all students, including those with one or more special needs, often benefit from the same accommodations or modifications, it may be both more useful and efficient to address potential areas of difficulty in foreign language learning acquisition by all students as a whole rather than to consider potential areas of difficulty for each of the 13 special needs areas that are designated under IDEA.

First, research has shown that students who have faced difficulties acquiring reading and writing skills in their native language often face challenges when acquiring another language (Downey & Snyder, 2000; Mabbott, 1994). While in many content areas students can circumvent challenges they have faced in their native language, within the foreign language classroom, language is the content, compounding these difficulties (Ofesh, 2007). Within the linguistic components of language acquisition, phonology, syntax, semantics, and morphology were found to be particularly problematic areas for language learners (Downey & Snyder, 2000; Ganschow, Sparks, & Javorsky, 1998; Leons, Herbert, & Gobbo, 2009; Simon, 2000; Sparks & Ganschow, 1993; Sparks, Ganschow, Javorsky, Pohlman, & Patton, 1992). Anxiety (Ganschow et al., 1994) and a more traditional focus on memorization and grammar have also been demonstrated to increase the struggles of students with disabilities within foreign language learning (DiFino & Lombardino, 2004). Students who have challenges in working memory, self-regulation, and internalized speech have also demonstrated difficulty in acquiring a foreign language (Barkley, 1997). Vann and Abraham (1990) explored difficulties faced by two women with learning disabilities attempting to learn English later in life and found that their troubles arose not because they were passive in the language learning process, but rather because they were applying strategies that they had learned, including comprehension checks and deduction, inaccurately.

Focusing on these particular areas of difficulty is not meant to perpetuate the belief that some students can, and others cannot, learn a language; rather, the goal is to make foreign language educators more aware of what previous research has discovered about the potential areas of difficulty that their students may face. With a more meaningful understanding of the challenges students face within their classroom, instructors are able to be more alert in meeting their students’ needs.

**Modifications and Accommodations**

Additional research regarding students with disabilities in the foreign language learning environment has concentrated on potential modifications and accommodations that should be made available. To that end, it is critical that instructors understand that “the curriculum is not immovable … to which students with disabilities have to gain access. It is there to be changed … to include all students” (Training and Development Agency for Schools, 2009, p. 6). While modifications and accommodations allow for increased access to a predetermined curriculum, a truly inclusive education calls for alterations to both the curriculum and the instructional practices
at a macro level so as to allow all students, with each of their specific needs in mind, to
gain access in a meaningful and purposeful way to the content and to develop the req-
quisite language skills and cultural understandings. Since much of the research
focused on specific modifications and accommodatons and these tools can be
used to help alter the curriculum for all students, that work is summarized here,
although language educators are advised to use these insights in facilitating an inclu-
sive learning environment, not solely to modify what currently exists while poten-
tially perpetuating barriers.

Much previous research has called for accommodatons and modifications (Table
2) based on an individual student’s need (Arries, 1999; Duvall, 2006; Sparks & Gan-
schow, 1993). Other research has addressed the need to provide a variety of learning
activities (Hurst, 1996), to support a focus on communicative competence (Mabbot, 1994),
found that modified language classes were more successful when they included small
class sizes, positive classroom culture, extra time, reduced quantity of content, and pre-
test preparation. Skinner and Smith (2011) added that strategic approaches to learning,
such as organizers and mnemonic devices, as well as frequent review and repetition, led
to increased success for students with special needs. A multisensory, structured
method of language instruction, with emphasis on explicit phonological and syntac-
tic teaching, also resulted in gains in phonology, vocabulary, and verbal memory for
students with disabilities (Leons et al., 2009; Skinner & Smith, 2011; Sparks, Gan-
schow, Pohlman, Artzer, & Skinner, 1992). Assessments such as portfolios that evaluate
a student’s achievement instead of reflecting, or even magnifying, a student’s disabil-
ity are beneficial and guaranteed under Section 504 of the Rehabilitation Act of
1973 (Moore, 1995; Rehabilitation Act, 1973). Support from speech language path-
ologists has also been recommended to more effectively diagnosis language learn-
ing disabilities and to reflect those special needs in IEPs (Ganschow, Philips, & Schneider, 2001).

While the above list of research-based teaching practices is not totally comprehen-
sive, nor are the accommodations and mod-
ifications to the curriculum and to instructional strategies meant to be used as stand-alone solutions, they stand as sug-
gestions to support language educators. Downey and Snyder (2000) found that,
when accommodations were implemented based on student need, the need for course

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<td><strong>Suggested Curriculum Alterations for All Students</strong></td>
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- Differentiated learning activities
- Small class sizes
- Additional time
- Explicit learning strategies, e.g., organizers, mnemonic devices
- Reduced amount of content, e.g., five to nine vocabulary items at a time (Khoi & Sharififar, 2013)
- Frequent review and repetition
- Explicit linguistic teaching, e.g., pronunciation and syntax
- Alternative assessments, e.g., portfolios
substitutions and exemptions at the post-secondary level decreased. Similarly, Skinner and Smith (2011) confirmed that the literature “is increasingly indicating that many of these students [with special needs] can successfully complete foreign language curricula. This is especially true when accommodations and specialized teaching methodologies are implemented ... to meet the needs of students with [learning disabilities]” (p. 42).

Available Resources
Although it is not possible to provide an exhaustive list of resources, there are many available to support educators in developing inclusive foreign language learning environments. First, educators who may wish to better understand their own beliefs about inclusive learning environments and practices can begin by completing self-assessments on inclusive education (Training and Development Agency for Schools, 2009). In addition, a rich literature and an array of Web sites offer additional resources on individual disabilities, describe inclusive practices, and provide case studies focusing on students with learning disabilities in the foreign language classroom (European Commission, 2005; Evarrs & Knotek, 2006; McColl, 2000b, 2013; Wilson, 2013). While focused on immersive language settings, Fortune and Menke’s (2010) work—in particular the guiding principles at the end of their first chapter—provided insight into difficulties faced by students learning another language, support for developing literacy skills, and suggestions about diagnostic assessments. They suggested that educators “consider the learner as a unique individual ..., establish realistic achievement and proficiency standards ..., elicit expectations from parents ..., secure specialist staffing..., put student needs first ..., hold high expectations for your learners ..., [and] trust the universal human capacity for language learning” (pp. 10–11). Finally, there are additional resources for students with disabilities who are applying to colleges and who would like further information on language requirements (Kravets & Wax, 2012; Scott & Manglitz, 1997).

Conclusion
Existing research on students with learning disabilities studying a foreign language is lacking both in breadth and in depth. Much additional work is needed regarding the philosophies, policies, and practices that prohibit foreign language learning by all students as well as on the attitudes of learners, parents, foreign language instructors, instructors of other content areas, counselors, administrators, and the general public concerning the critical role of language learning, particularly for students with special needs. Additional research is also needed on student and instructor perceptions regarding the learning process and learner identities, as are sustained studies of the ways in which teacher educators, instructors, and administrators might facilitate inclusive foreign language learning environments. Finally, much of the available research has centered on English-speaking students. In the words of McColl (2000b) only in the English-speaking world “is it the norm for people to be able to express themselves in one language only. In most countries ... two or more languages are spoken ... by everybody .... There is no distinction between those who can and those cannot; all just do” (p. 3; emphasis in original). Thus, additional research and insights into disabilities is needed in countries where multilingualism is the norm.

The extent to which students with special needs are denied the opportunity to study foreign languages, in spite of the numerous benefits and in conflict with inclusive policies and federal mandates, is not clear. It is clear, however, that educational professionals are required to design inclusive “language courses to accommodate students with [learning disabilities] and simultaneously to meet the needs of all students” (Arries, 1999, p. 103). Research has
called for the development and implementation of appropriate professional development for language instructors as well as an increase in support services to help instructors meet the needs of students (Batista-Arias, 2011; Rehorick et al., 2006; Rhodes & Pufahl, 2009). Since all students, everywhere, deserve—and, in the United States, are, in fact, guaranteed—equal access to all content areas, including the opportunity to develop proficiency in another language and to better understand other cultures, it is our responsibility to provide students, educators, and other stakeholders with the resources and support necessary to make the foreign language learning environment inclusive to all learners. Indeed, it is time to practice the inclusive education that we preach across all aspects of a child’s education.

Notes
1. For the purpose of this work, students with disabilities are identified as those students who have been classified within one of the categories under the Individuals with Disabilities Education Act (IDEA, 2004) within the United States.
2. Some of the works cited may appear outdated. However, this speaks to the minimal amount of research available on this topic.
3. The majority of the works examined were from traditional foreign language contexts, and when available, research from other English-speaking countries as well as immersion contexts were included. Research on dual-language students with specific language impairments (Adelaida Restrepo & Gutierrez-Clellen, 2001; Gutierrez-Clellen, Simon-Cereijido, & Erickson Leone, 2009; Gutierrez-Clellen, Simon-Cereijido, & Sweet, 2012; Paradis, Schneider, & Sorenson Duncan, 2013; Simon-Cereijido & Gutierrez-Clellen, 2014) was not included as it did not specifically meet the parameters of this review.
4. This was determined through a Freedom of Information Law (FOIL) request submitted by the author to New York State in February 2014.
5. Modifications entail a change in “what is being taught to or expected from the student,” such as a shorter reading assignment than a peer, and an accommodation is “a change that helps a student overcome or work around a disability,” such as extended time on assessments (NICHCY, 2013, para. 3).

References

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Submitted August 27, 2014

Accepted November 13, 2014