

Chapter 11

Bilingualism in the United States: Present Attitudes in the Light of Past Policies

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Introduction

Bilingualism in the United States has become public and controversial. The large size of the United States population that uses an ethnic mother-tongue at home is not in itself an issue. However, the daily use of non-English languages in schools, churches, newspapers, radio broadcasts, voting polls, courts and politics, has attracted many critics who argue that bilingualism is a private matter and should not be encouraged by public policy.¹ In contrast, advocates of bilingualism argue that bilingualism is a national resource that must be supported and developed by any responsible modern government.² This paper will briefly trace the history of bilingualism in the United States up to the present period. It will then present current attitudes from the perspective of these past policies.

The Nature of Bilingualism in the United States

Although bilingualism has a long tradition in the United States, it has always existed only at an individual level and has never been promoted as a stable feature of American society. In Joshua Fishman's terms, what is accepted in the United States is *bilingualism*, that is, the use of two languages by individuals, but not *diglossia*, that is, the enduring societal arrangement for the existence of two languages, each having its secure, legitimate and widely implemented functions.³

Bilingualism can result from two different situations:

(a) The second language is acquired naturally when two languages come into contact.

(b) The second language is learned in a formal situation such as schools.

This distinction between *natural* and *learned* bilingualism has great relevance to an understanding of attitudes toward bilingualism in the United States. While the first type of bilingualism constitutes a *group* process that occurs naturally in any society, like the United States, where immigration is prevalent, the second is a process of *individual* enrichment. As we will see, even learned bilingualism has been opposed in some periods of United States history. But it

is natural bilingualism that has caused most of the controversy and does still today.

Bilingualism in United States History

English has never been the official language of the United States, but it has clearly been the *de facto* dominant language since the British colonists introduced it in North America.⁴ We can distinguish five major periods in United States history with regard to attitudes toward bilingualism.

1. From 1777 to 1880

Although English was promoted by many, such as John Adams and Noah Webster, during this first period, languages other than English were widely used by the foreign ethnic minority that dominated the colonies. In fact, the political system of the new nation was legitimized in texts that used different languages. For instance, the Articles of Confederation were published in English and in German. The use of languages other than English was considered during this period an appropriate measure to integrate new immigrants into the society.⁵

2. From 1880 to 1923

By 1880, the previous promotion of the ethnic mother-tongues for the benefit of the government was completely restricted. This change seems to be explained by the change in the origins of the immigrants. Whereas the bulk of the immigration prior to 1880 was of northern European background, the 35 million immigrants who came to the United States after 1880 were primarily from southern and eastern Europe.⁶ They were considered racially inferior and thus race and ethnicity became the predominant factors in restricting the use of non-English languages in both public and private. This practice had its antecedents in attitudes already existing prior to 1880, when the languages of Native Americans and of Africans were an exception to the promotion of ethnic mother-tongues. The fact that in 1880 the United States economy had begun to provide fewer opportunities also made it necessary to restrict linguistic rights as a means of limiting educational and economic benefits. These restrictive measures directed toward racially distinct immigrants at a time of economic hardship, coupled during World War I with mistrust of the large German minority, led to the Americanization movement that encouraged the ban on use of non-English languages. By 1923 there were thirty-four states that explicitly allowed only English as the medium of instruction in both public and private schools.⁷

3. From 1923 to 1958

In the famous Meyer vs. Nebraska case of 1923 (262 US 390), a Nebraska statute that prohibited the teaching of foreign languages was rendered

unconstitutional. This judicial decision viewed ethnic languages also as "foreign" and thus as something to which individuals have a right as an enrichment practice. However, this decision did not recognize the language rights of the ethnic minority. Bilingualism is thus publicly seen in this period as a private practice to which all are entitled as individuals, but which is not encouraged by policy.

4. *From 1958 to 1968*

In the wake of Sputnik, legislation such as the National Defense Education Act of 1958 (Title VI of the Foreign Studies and Language Development, 20 USC 401 ff.) and the Fulbright-Hays Act (Section 102 (b) (6) of the Cultural Exchange Program of 1961, 22 USC 117 ff.), as well as the Foreign Languages in the Elementary School (FLES) movement, promoted bilingualism of United States citizens for defense purposes. This bilingualism was seen as the use of English plus a "foreign" language, and was indeed a change from the favorable public attitude toward bilingualism in the nineteenth century when bilingualism consisted of English plus an "ethnic mother tongue." Yet, whereas the bilingualism that was encouraged by these promotive measures was permanent (English + foreign language), the bilingualism that had been encouraged in the early nineteenth century was in the long run transitional (ethnic mother-tongue + English → English).

The 1958 to 1968 period promoted learned bilingualism at an individual level for the benefit of the United States government. However, no effort was made to promote natural bilingualism as a more expedient and less expensive measure. During this period of promotion of foreign languages, only one voice rose to encourage the maintenance of ethnic mother-tongues as important to the country at large Joshua A. Fishman.⁸ His *Language Loyalty in the United States* (1966) became the first inspiration for public support of natural bilingualism, not just as a transitional phenomenon as it had existed in the nineteenth century, but as a permanent measure that would secure for the benefit of the majority as well as the minority the preservation of the ethnic mother-tongue.

5. *1968-present*

Of the 226.5 million people in the United States in 1980, nearly 23 million United States residents speak a language other than English at home.⁹ Almost half of these speak Spanish. Of the 11.1 million who speak Spanish at home, 8.3 million consider themselves bilingual, since they report that they speak English very well or well. Of the 11.8 million who use another ethnic mother-tongue at home, 10.3 million indicate that they speak English very well or well. Thus, of the 23 million people in the United States who use a language other than English at home, 18.6 million are bilingual.

Although the large number of people who use non-English languages at home alarms many, the use of ethnic mother-tongues in private has been tolerated throughout United States history. It is only when these ethnic

mother-tongues begin to be used in public that bilingualism becomes controversial.¹⁰ Starting in 1968, programs organized by the government as well as by ethnics themselves made bilingualism a public issue. Support for natural bilingualism in public, especially when it is government-funded, has been sharply criticized. In contrast, since learned bilingualism remains a mostly private phenomenon, it is not seen as a threat. Thus, even when the recent trend has discouraged natural bilingualism, learned bilingualism continues to be encouraged.

I. 1968—the Present. Natural Bilingualism

A. The use of the ethnic mother tongue in public: Government Programs

The bilingual measures introduced after 1968, despite misinformed public opinion to the contrary, do not promote permanent bilingualism (ethnic mother-tongue + English). In effect, they only support transitional measures that accelerate the shift to English by permitting the minority to participate more fully in American society.¹¹ Senator Ralph Yarborough, a Democrat from Texas who proposed the original bill that later became the Bilingual Education Act, declared in the Senate on 1 December 1967: "My purpose in doing this is not to keep any specific language alive, . . . but just to try to make those children fully literate in English."¹² In the same way, the Amendments to the Voting Rights Act are not an assertion of the language rights of the ethnic minority, but rather a desire to allow the linguistic minority to participate in the democratic process.

Before we examine the prevalent attitudes toward bilingualism in the United States today, we will review the laws and judicial decisions that allow the transitional use of ethnic mother-tongues in education, elections, and other government-funded programs.

(a) *Education.* The continuing rise in the number of students with limited English proficiency in United States schools induced the government to become involved in meeting their educational needs. According to the report entitled "Projections of Non-English language background and limited English proficient persons in the United States to the year 2000" issued by the National Clearinghouse for Bilingual Education on October 1980, the total number of LEP children aged 5–14 estimated for 1976 is 2.5 million, with a drop to 2.4 million in 1980 and a gradual increase to 2.8 million in 1990 and 3.4 million in 2000.

In 1968 the Bilingual Education Act was passed as Title VII of the Elementary and Secondary Education Act (20 USC 880 b). This law, later reauthorized in 1974 and 1978, provides financial assistance to educational agencies that establish programs of instruction using native languages for children of limited English proficiency. In 1979 it was estimated that there were 300,000 children served by Title VII grants in over seventy languages.¹³ The Equal Educational Opportunity Act of 1974 (20 USC 1701–1703) also

supported bilingual instruction by requiring that educational agencies "take appropriate action to overcome language barriers that impede equal participation by its students in its instructional programs."

At the state level, there are now thirty-one states that have bilingual provisions which explicitly or implicitly permit school districts to offer courses in a non-English language. Yet, there are still four states - Arkansas, Nebraska, North Carolina, and West Virginia - which have English-only statutes applicable to both public and non-public schools.¹⁴

The federal legislation supporting bilingualism in schools has been reinforced by important judicial decisions.¹⁵ The most important decision in this respect, *Lau vs. Nichols*, guaranteed the right of non-English-speaking students (in this case Chinese) to a meaningful education. Although the Supreme Court's ruling on 21 January 1974 mandated school districts to address the needs of their non-English-speaking students, it did not expressly endorse bilingual education, but proposed it as one course among many that could be taken to remedy the situation.

A task force that was set up after the *Lau* decision by the Office of Civil Rights issued a memorandum in 1975 entitled "Task Force Findings Specifying Remedies Available for Eliminating Past Educational Practices Ruled Unlawful under *Lau v. Nichols*." This memorandum, which became known as the "Lau Remedies," mandated districts with more than 5 percent minority children to set up voluntary compliance plans to include bilingual education. Although these remedies were disseminated, they were never published in the Federal register for review and comment, nor published in final form. In 1978, they were challenged in court by the Northwest Arctic School system in Alaska. Following a court order that resulted from this challenge, the proposed *Lau* regulations were issued by the Secretary of Education under the Carter administration, Shirley M. Hufstедler, on 4 August 1980 (*Fed. Register*, Vol. 45, No. 152). These regulations would have required transitional bilingual instruction for a minimum of two years and a maximum of five for students who spoke the non-English language better than English. As required by law, a public comment period for the proposed regulations ended 20 October, 1980, and regional hearings were held in San Antonio, New York City, Denver, New Orleans, San Francisco, and Chicago. The Education Department's Office for Civil Rights received over 4000 letters from citizens, parents, educators, and professional organizations. Many of these letters were overwhelmingly critical of the proposed regulations as being unnecessarily prescriptive.¹⁶

The new Republican administration that came to office in November 1980 prepared to tighten the budget of a hurting economy. The restriction of bilingualism in education became a favorite example of how the federal government could save money while giving the power back to the states. On 2 February 1981, the new secretary of Education, Terrel H. Bell, withdrew the *Lau* regulations that had been proposed by the Carter administration. Secretary Bell offered the following explanation: "We will protect the rights of children who do not speak English well, but we will do so by permitting school districts to use any way that has proved successful."¹⁷

There are two bills regarding bilingual education now under consideration that would further restrict the use of the non-English language in the classroom. The Bilingual Education Amendments of 1981 (S 2002), introduced by Senators Huddleston (D-KY) and Absnor (R-S.D.), limits the time a child can participate in bilingual education to one year. The Bilingual Education Improvements Act of 1982 (S 2412), developed by the present Administration, would amend the definition of bilingual education to authorize funding of a wider range of educational approaches which might not be bilingual in nature, such as English as a Second Language and immersion.

A recent "decision memorandum" authored by Emerson J. Elliott of the Education Department's Office of Planning and Evaluation said that the department's 1983 budget proposal would "reflect a new and more flexible Federal policy . . . [that] would permit the funding of any special language program that addresses the needs of English limited children."¹⁸ Furthermore, instruction in the ethnic mother-tongue would be restricted to only those children whose dominant language is other than English. The emphasis of the new administration is clearly not on promoting natural permanent bilingualism.

This trend away from support of bilingual instruction has also been felt at the state level. For example, in 1975 Colorado had passed a stringent bilingual education law. However, in August 1981 the English Language Proficiency Act repealed the bilingual-bicultural program by limiting eligibility on language dominance (which language a child uses first and most naturally) and not on language proficiency (how well the child speaks and understands a particular language). Furthermore, the new law promoted English as a Second Language as the most desirable method of instruction.¹⁹

(b) *Elections.* Bilingual elections were a result of a long process that started when the Voting Rights Act of 1965 (42 USC 1973 b) eradicated the use of literacy tests. The fact that Puerto Ricans were being barred from voting was declared an injustice. Beginning in 1973, a series of lawsuits were filed. In the important case Puerto Rican Organization for Political Action vs. Kusper, the court determined that a Spanish monolingual could not cast an effective vote in an English-only election. The Voting Rights Act was finally amended in 1975, and section 203 of Title II and section 301 of Title VIII provided for bilingual elections. The law insured that any voting or registration material must be translated when 5 percent of the voting age population were members of a single-language minority group.²⁰ The Act is up for reauthorization in the Fall of 1982 and the controversy has become heated. It is reported that after every election, letters reach congressional offices and the Federal Elections Commission demanding repeal of non-English language ballots. Protests over the bilingual ballot are also common in radio and television talk shows. Representative Don Edwards, the Democrat from San Jose who helped write the 1975 legislation, recently stated: "The letters and comments against them are running 500 to 1. I've got 500,000 people back home, most of whom don't want it."²¹

(c) *Other government programs.* There are a number of other important government measures that encourage the use of the non-English languages in public. For example, the Court Interpreter's Act (Public Law 95-539) enacted on 28 October 1978, provides for the use of interpreters in courts of the United States. The 1980 census provided Spanish language questionnaire forms. Many government agencies which provide social-welfare benefits have also made strides in employing bilingual workers and in printing bilingual forms. Yet, rather than encouraging permanent bilingualism, all these government measures use the ethnic mother-tongues only to promote the assimilation of today's numerous non-English immigrants.

B. The use of the ethnic mother tongue in public: Ethnic Programs

The present bilingual policies of the United States government do not promote permanent bilingualism. They only address the communication needs of monolingual speakers of ethnic mother-tongues who are mostly first-generation immigrants. These government programs grew as outcomes of the Civil Rights Act of 1964 (42 USC Section 2000d), which prohibits discrimination "on the ground of race, color or national origin." The temporary use of the ethnic mother-tongue while the immigrants shift to English guarantees the right of those individuals to equal opportunity.

The ethnic boom that was felt in Europe in the 1960s has also influenced ethnolinguistic minorities in the United States. Second- and third-generation ethnics today have been victims of government and educational policies that discouraged bilingualism. Thus, they are now monolingual English speakers. For racially indistinct ethnics, this shift to English has been often accompanied by structural incorporation into the mainstream. During the last decade, these second- and third-generation ethnics, who are culturally, linguistically, and structurally assimilated, have begun to feel a keen interest in their country of origin and their ethnic mother-tongue. Thus, they have established socio-cultural institutions that are organized, funded, and governed by the ethnic group. The purpose of these institutions is to preserve the ethnic culture and to maintain the ethnic mother-tongue. Language Resources in the United States III, a research project being conducted under the direction of Joshua Fishman at Yeshiva University, has documented the enormous growth of ethnic publications, ethnic broadcasts, ethnic religious units, and ethnic mother-tongue schools in the United States. In 1980, Language Resources III had identified 762 ethnic publications in 48 languages, 2470 radio and television broadcasts in 59 languages, 5414 schools in 50 languages, and 7203 religious units in 41 ethnic-mother tongues.²²

These ethnolinguistic socio-cultural institutions differ in the degree of interest that they have in maintaining the ethnic mother-tongue and in promoting permanent bilingualism. Differences in language loyalty among ethnolinguistic groups have also been identified. Yet, what is important is that in 1980, while the United States government was promoting transitional bilingualism among ethnics, ethnics themselves were succeeding in efforts to

maintain their separateness and unique cultural and linguistic characteristics. There has been a reawakened interest in ethnicity and in the ethnic mother-tongue especially among ethnics who have succeeded in American society.

Attitudes toward natural bilingualism today

Editorials that appear daily in major United States newspapers vehemently oppose permanent natural bilingualism.²³ Even transitional natural bilingualism has been attacked. For example, Stephen Rosenfeld and Noel Epstein, both of *The Washington Post*, and Fred M. Hechinger of *The New York Times* have been openly critical of bilingual education. The promotion of a non-English language even as a temporary measure is seen as divisive since it emphasizes loyalty to the old country. Many critics of bilingualism in the United States feel that it would weaken national unity and would create a separatist movement similar to that of Quebec.²⁴ Nathan Glazer, in a paper prepared for a conference on bilingualism at the University of Southern Carolina, summarizes these arguments as follows:

The critics seem to be saying that it was a good thing that people of many stocks were molded here into one nation speaking one language, that it would have been a worse country had this not happened, and therefore it could be a worse country because it now is happening less.²⁵

President Reagan, speaking against bilingual education before the National League of Cities on 2 March, 1981, stated that it was "absolutely wrong and against American concepts to have a bilingual education program that is now openly, admittedly, dedicated to preserving their [students'] native language."²⁶

The continuous influx of large number of immigrants coupled with an increased ethnic awareness is seen as a threat to the strength and cohesiveness of the United States. A Miami editor expresses this new xenophobia as follows: "People feel threatened because this was basically an English-speaking community twenty years ago and it no longer is."²⁷ It is precisely this threat that has encouraged Senator S. I. Hayakawa from California to propose a constitutional amendment (Senate Joint Resolution 72) to make English the official language of the United States. Hayakawa's amendment has received little support. However, most of his critics do not favor bilingualism, but feel that the amendment is completely unnecessary, since English is and will continue to be the *de facto* official language of the United States.

This restriction of natural bilingualism in the United States has also been felt at the state level. In November 1980 an antibilingual ordinance was passed in Dade County, Miami. Although the new ordinance did not repeal the 1973 resolution that made Dade county bilingual, it did cut off funds to promote any language but English, or any culture but American.

II. 1968—the Present, Learned Bilingualism

While natural bilingualism was encouraged by the government as a transi-

tional stage and by ethnics as a permanent condition in the 1970s, interest in learned bilingualism decreased tremendously during this decade. In 1970, 24 percent of the students in the seventh to twelfth grade were studying a foreign language. By 1976, the latest year for which figures are available, the number had slipped to 17.0 percent.²⁸

As the 1970s drew to a close, interest in natural bilingualism decreased, while interest in learned bilingualism increased. The President's Commission on Foreign Languages and International Studies was instrumental in promoting learned bilingualism. The recommendations issued by the Commission in November 1979 suggested the reinstatement of the foreign-language requirement and stated that language education should start earlier and last longer.²⁹ Two bills recently introduced by Representative Paul Simon and Senator Moynihan (H.R. 3231 and S. 1817 respectively) attempt to provide grants for foreign-language programs to improve foreign-language study for elementary- and secondary-school students.

Recently, the Modern Language Association has reported that for business and political reasons the number of students taking non-Western languages (especially Arabic, Chinese, and Japanese) has increased significantly. Richard Brod, the M.L.A.'s director of the Foreign Language program, believes that "an interest in language study will grow in the broader context of increasing attention to international concerns."³⁰

It is significant to notice that as public attitudes against natural bilingualism increase, interest in learned bilingualism increases. The two forms of bilingualism have been generally perceived by the American public as being distinct. Today, whereas natural bilingualism for the minority is vehemently opposed, learned bilingualism for the majority is approved and favored.

Bilingualism in the future?

The two tendencies prevalent in the 1980s – that is, the restriction of natural bilingualism for the welfare of the minority coupled with the promotion of learned bilingualism for the welfare of the majority – have centered today's discussions about bilingualism in the future on reasonings that had been advanced by Fishman since 1966. Fishman had argued that if bilingualism is beneficial to all, the least expensive and most efficient way to promote it would be by encouraging both natural and learned bilingualism. Recent attempts to encourage bilingualism in the United States for business and defense purposes promote permanent natural and learned bilingualism for the benefit of the minority as well as the majority. The bill proposed by Congressman Henry B. Gonzalez of Texas (H.R. 4389) "to establish a National Commission for Utilization and Expansion of Language Resources" falls under this new trend. The proposed Commission would "develop a national policy for identifying, preserving, and improving our language resources as well as a program to encourage the development of language skills for use in nontraditional areas such as commerce, trade, and defense." The recent memorandum on bilingual education issued by the Hazen Foundation along with the Academy for

Educational Development also promotes this goal. This memorandum summarizes the new shift in bilingual policy as follows:

The American public is beginning to accept the ideas of "minimum competencies" and "basic education" expected of all those growing up in the society. Language competence, including proficiency in at least one language in addition to English, could become part of the constellation of basic skills more generally expected of students. The participation of all kinds of students in bilingual education programs is a way for the worlds of foreign language instruction, bilingual education, and education for international understanding to come together as part of a general improvement in American education.³¹

Current attitudes toward bilingualism in the United States are not new. English has endured as the *de facto* language precisely because the majority has always favored it as the only link to American ethnicity. Although government programs have used the non-English languages in public, monolingualism rather than bilingualism has been the ultimate goal of the programs. Recently, second- and third-generation ethnics in the United States have joined other ethnolinguistic minorities in the world in struggling for recognition of their distinct ethnicity and language. The extensive use of the ethnic mother-tongues in government and ethnic programs has created a wave of opposition to public bilingualism in the United States. The majority of United States citizens have never favored permanent natural bilingualism, although they have allowed transitional bilingualism as a temporary stage on the way to complete shift to English.

More favorable attitudes have always existed toward learned bilingualism than toward natural bilingualism. Yet, the United States have never been successful in promoting bilingualism in schools. Although learned bilingualism is favored by most Americans as an enrichment activity, it is very difficult to achieve within a society that always equates bilingualism with disloyalty and foreignness.

Only one out of ten persons in the United States has a second language.³² Bilingualism in the United States will remain a rare phenomenon, unless it is promoted for both the majority and the minority.

Notes

1. The following editorials in the *New York Times* repeat this majority view: "Divisive languages," 28 Oct. 1975, "Bilingual danger," 22 Nov. 1976, "The bilingual goal, in plain English," 26 Nov. 1977, "Many voices, but one language," 12 Dec. 1979, "Battle over bilingualism," 8 Sept. 1980, "In plain English," 10 Oct. 1981.
2. Joshua Fishman, *Bilingual Education: An International Sociological Perspective* (Rowley, Mass.: Newbury House, 1976), pp. 3-22, A. Bruce Gaarder, *Bilingual Schooling and the Survival of Spanish in the United States* (Rowley, Mass.: Newbury House, 1977), pp. 95-128.
3. Joshua Fishman, "Societal bilingualism: Stable and transitional," in *Language in Sociocultural Change* (Stanford: Stanford University Press, 1972), pp. 135-136.
4. The following give good accounts of past language policy in the United States: Steven A. Grant, "Language policy in the United States. Report to the Task Force on Government Relation," in *Language Study for the 1980s. Reports of the MLA-ACLS Language Task Force*, ed. Richard I. Brod (New York: Modern Language Association of America, 1980), pp. 95-105. Shirley Brice Heath, "A National Language Academy? Debate in the New Nation," *International Journal of the Sociology of Language*, No. 11 (1976); Shirley Brice Heath, "Language politics in the United States," in *Georgetown University Roundtable*

- (1977), pp. 267-296; Arnold H. Leibowitz, "Language policy in the United States," in *Bilingual Education*, ed. La Fontaine, Persky, Bogubchick (Wayne, New Jersey: Avery, 1978), pp. 3-15.
5. Heinz Kloss, p. 84, Ricardo Otheguy, "Thinking about bilingual education: A critical appraisal," *Harvard Educational Review*, 52, No. 3 (1982), 308.
 6. Heinz Kloss, p. 13.
 7. Arnold H. Leibowitz, "Language policy in the United States," pp. 5-8.
 8. Joshua A. Fishman, *Language Loyalty in the United States* (The Hague; Mouton, 1966).
 9. Provisional Estimates of Social, Economic, and Housing Characteristics, PHC 80-S1-1.
 10. This attitude is characteristic of many critics of bilingualism. See, for example, Richard Rodriguez, *Hunger for Memory* (Boston: Godine, 1981).
 11. For the claim that transitional bilingual education reduces ethnic mother-tongue maintenance see Joshua Fishman, "Minority language maintenance and the ethnic mother tongue school," *Modern Language Journal*, 64 (1980), 167-173, and "Bilingualism and biculturalism as individual and as societal phenomena," in *Bilingual Education for Hispanic Students in the United States*, ed. Joshua A. Fishman and Gary D. Keller (New York: Teachers College Press, 1982), p. 35. See also Bruce Gaarder, *Bilingual Schooling*, p. 146; Rolf Kjolseth, "Bilingual education programs in the United States. For assimilation or pluralism," in *Bilingual Schooling in the United States*, ed. Francesco Cordasco (New York: McGraw Hill, 1976), pp. 122-140. This is also the view expressed by Hispanic leaders in William Trombley, "Overtones of politics affect bilingual policy," *Los Angeles Times*, 7 Sept. 1980.
 12. Heinz Kloss, p. 37.
 13. U.S. Office of Education, *Strengthening Bilingual Education*, June 1979, p. 5.
 14. For an up-to-date summary of statutory and constitutional provisions at the state level and court decisions and legislation at the federal level regarding bilingual education see Tracy C. Gray, H. Suzanne Convery, and Katherine M. Fox, *The Current Status of Bilingual Education Legislation* (Washington D.C.: Center for Applied Linguistics, 1981). Also see Herbert Teitelbaum and Richard J. Hiller, "Bilingual education: The legal mandate," *Harvard Educational Review*, 47, No. 2 (1977), 138-170.
 15. Other cases which upheld bilingual education are *Serna vs. Portales Municipal Schools* (CANM 1974, 499 F. 2d 1147), *Keyes vs. School District No. 1 Denver, Colorado* (C.A. Colo. 1975, 521 F. 2d 465), *Morales vs. Channon* (C.A. Tex. 1975, 516 F. 2d 411). More recent cases include *The Idaho Migrant Council vs. Board of Education* (647 F. 2d 69 1981), *Castaneda vs. Pickard* (648 F. 2d 989).
 16. Fred M. Hechinger, "U.S. ruling fuels controversy over bilingual teaching," *New York Times*, 20 Jan. 1981. The same attitude appears in "Bilingual rules for schools draw protest from union," *American Teacher*, Oct. 1980. Also in Albert Shanker, "Can U.S. force schools to go bilingual?" *New York Times*, 24 July 1980.
 17. Marjorie Hunter. "U.S. Education Chief bars bilingual plan for public schools," *New York Times* 3 Feb. 1981.
 18. Susan G. Foster and Eileen White, "Policy reversal on bilingual efforts charted in memo," *Education Week*, 10 Feb. 1982.
 19. J.R. "Advocates in three states struggle to keep bilingual education," *Center for Law and Education Newsnotes* (Cambridge, Mass), Jan. 1982.
 20. Joan Rubin, "Spanish language planning in the United States." Keynote address at El Español en los Estados Unidos, Chicago, 3 Oct. 1981.
 21. David Hoffman, "Representative Edwards caught in middle of battle over bilingual ballot," *San Jose Mercury News*, 1 Feb. 1981.
 22. Joshua A. Fishman, Michael Gertner, and Esther Lowy, "The Non-English Language Resources of the United States. A Preliminary Reconnaissance." Report to the U.S. Department of Education, 1980, p. 21.
 23. For examples of these editorials see note 1.
 24. See, for example, "Many voices but one language," *New York Times*, 12 Dec. 1979; William Trombley, "Overtones of politics affect bilingual policy," *Los Angeles Times*, 7 Sept. 1980; "Charles McCabe himself," *San Francisco Chronicle*, 15 Oct. 1980.

25. Martin Ridge, ed., *The New Bilingualism: An American Dilemma* (Los Angeles: University of Southern California Press), p. 64.
26. Lawrence Feinberg, "Reagan denounces Carter's proposed rules on bilingual education," *The Washington Post*, 4 Mar. 1981.
27. William Trombley, "Can bilingual education do its job?" *Los Angeles Times*, Sept. 4, 1980.
28. Lee Dembart, "Mystery shrouds language skills," *Los Angeles Times*, 7 Sept. 1980.
29. Final Report of the President's Commission, *MLA Newsletter*, Aug. 1980, p. 1.
30. Pat Orvis, "More students learn 'exotic' languages," *New York Times*, 22 April 1980.
31. "A new direction for bilingual education in the 1980's," Mimeographed statement based on a meeting convened on 23 July 1981 by the Hazen Foundation and the Academy for Educational Development.
32. Language Usage Census (CPR Series P-23, No. 60).