Inclusion: The Pros and Cons
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Introduction

Few issues in education generate more discussion, confusion, or apprehension than the topic of inclusion. It is an issue that has outspoken advocates on all sides, whether staunchly for, avowedly against, or somewhere in between. Certainly, for a school or district to change and accommodate a more inclusive approach to providing services to students with disabilities as well as a host of other “at-risk” students, and do it in a way that ensures the success of all, will require significant restructuring. Inclusion is more than reconfiguring special education services. It involves an "overhaul" of the entire educational system. Special education and regular education faculty/staff roles and relationships will change, as will the traditional rules under which "things" happen within the classroom, campus, and district. Therefore, understanding the issues and ramifications prior to undertaking such a restructuring effort will be useful.

For many, the concept of inclusion remains somewhat vague. What does inclusion actually mean? What does it look like? Is it the same as full inclusion or mainstreaming? What is wrong with special education the way it is now? What changes would need to be made to adopt a more inclusive approach for special education services? What are the overarching issues—the pros and cons? This installment of Issues... about Change will investigate many of these issues surrounding inclusion. Specifically, a short historical synopsis of the development of special education services will be presented, followed by a clarification of terms. Philosophical, educational, and legal arguments for and against greater inclusion are also presented. The paper concludes with a short discussion of implications for educational practitioners and district policy makers. Finally, in addition to an extensive list of references cited in the article, a list of other resources is included below for those interested in further investigation.

Historical Background

Reynolds (1988) uses the term "progressive inclusion" to describe the evolution of services to those with various disabilities. He and others (Winzer, 1993; Stainback, Stainback, & Bunch, 1989b) point out that as the United States emerged as a nation, no educational services were available to people with disabilities. In the early 1800s, residential institutions, or asylums, began to emerge in order to accommodate those with hearing, visual, mental, or emotional impairments. Although access to those facilities was far from universal, such institutions remained the primary educational option for the disabled until special day schools came into fashion in the early 1900s. These allowed greater, more localized access and somewhat better services to individuals with disabilities.

During the 1950s and 1960s, parents of children with disabilities organized to pressure courts and legislatures for changes in educational services available to their children. They began to seek access to public schools as an issue of civil rights for those with disabilities. Among the results of these efforts was The Education for All Handicapped Children Act of 1975 (PL 94-142), which mandated that all children, regardless of disability, had the right to a free, appropriate education in the least restrictive environment. As a result, resource rooms and self-contained classrooms for those with disabilities expanded in public schools. PL 94-142 was updated in 1991 by the Individuals with Disabilities Education Act (IDEA).

In 1986, Madeleine Will, then-Assistant Secretary for the Office of Special Education and Rehabilitative Services (under the U.S. Department of Education), in an annual report regarding the status of special education programs, proposed what has been called the Regular Education Initiative. Citing concerns about some unintended negative effects of special education "pull-out" programs, her proposal suggested that greater efforts to educate mildly and moderately disabled students in the mainstream of regular education should be pursued (Will, 1986). Since then, support has grown for all students, including those with severe and profound disabilities, to be included and educated in classrooms with non-disabled peers, preferably in schools that they would attend if not disabled.

Determining the current status of educational placements of students with disabilities is difficult. Information varies depending upon the sources pursued. However, from the U.S. Department of Education's 16th Annual Report on Implementation of the IDEA (data from the 1991-1992 school year), it appears that about 35 percent of students with disabilities are attending school in regular classes. Of the remaining 65 percent, 36.3 percent receive special educational services in a resource room setting and 23.5 percent are in self-contained classes specifically tailored for students with disabilities. A little over 5 percent of students identified as needing special educational services receive them in settings outside the regular school setting (separate school, residential facility, homebound, or hospital).

Toward a Definition of Inclusion

Inclusion is not a new concept in education. Related terms with a longer history include mainstreaming, integration, normalization, least restrictive environment, deinstitutionalization, and regular education initiative. Some use several of these terms interchangeably; others make distinctions. Admittedly, much of the confusion over the issue of inclusion stems from the lax usage of several of these related terms when important differences in meaning exist, especially among the most common-mainstreaming, integration, inclusion, and full inclusion.
Mainstreaming and other, older terms are sometimes associated primarily with the physical assimilation of students with disabilities with their non-disabled peers. This may be more a matter of "connotative baggage" rather than intent. Nevertheless, mainstreaming assumes that students with disabilities may share the same physical space (classroom, playground, etc.) with those who have no disabilities only when they are able to do the same activities as everyone else with minimal modifications. Further, the primary responsibility for these students' education remains with their special education teacher.

According to Rogers (1993), mainstreaming has generally been used to refer to the selective placement of special education students in one or more "regular" education classes ... [Mainstreaming generally assumes] that a student must "earn" his or her opportunity to be mainstreamed through the ability to "keep up with the work assigned by the teacher to the other students in the class. (p. 1)

For some students with more severe disabilities, this has meant that their opportunities to be around non-disabled peers have been limited to (at most) lunch and recess; others may also have been integrated into physical education, music, art, and/or vocational programs. Typically, however, only students with mild disabilities have been allowed to participate in the traditional core academic content areas (mathematics, language arts, science, history, etc.).

Integration is a carry-over from the civil rights/racial desegregation legislation of the 1960s and before. Consequently, integration is primarily a legal term. It brings a greater implication than simply the physical blending of different ethnicities on a bus, at a workplace, or in a classroom. For schools this has meant not only busing children for appropriate ethnic balance demographically, but also seeking ways of fostering social and academic interactions. Just as in racial desegregation, the term "integration," as used by special educators, conveys the idea that students with disabilities ought to be desegregated from "pull-out" programs, self-contained classrooms, special schools, or institutions, and integrated into the realm of regular classrooms. Further, this change is meant to be not only in terms of physical proximity, but of academic and social integration as well. Sailor (1989) also suggests that special education integration, parallel to racial desegregation, should incorporate the notion that classrooms reflect naturally occurring percentages of those with disabilities (approximately 10 percent) in relation to those without disabilities. This position, however, is not universally held.

Integration is a somewhat more values-oriented term than integration, its legal counterpart. "The true essence of inclusion is based on the premise that all individuals with disabilities have a right to be included in naturally occurring settings and activities with their neighborhood peers, siblings, and friends" (Erwin, 1993, p. 1). Supporters of inclusive education use the term to refer to the commitment to educate each child, to the maximum extent appropriate, in the school and classroom he or she would otherwise attend. It involves bringing the support services to the child ... and requires only that the child will benefit from being in the class (rather than having to keep up with the other students). (Rogers, 1993, p. 1)

Note that both Erwin and Rogers stress the idea, held by many inclusion advocates, that students with disabilities should not just be educated with non-disabled peers, but that these educational efforts should be accomplished in the child's neighborhood school-"in the school and classroom he or she would otherwise attend." This means a commitment to move needed services and resources to the child with a disability rather than to place the child in a more removed or segregated setting where services and resources are located. An inclusive education program allows daily and/or weekly time in the school schedule for regular and special educators to collaborate. It seeks to expand the capacity of regular educators to be able to teach a wider array of children, including those with various disabilities, and to expand the roles of special educators as consultants as well as teachers. Also, in contrast to mainstreaming, the primary responsibility for the education of students with disabilities in an inclusive environment rests with the regular classroom teacher rather than the special education teacher. This does not, however, mean that special educators have no direct involvement in the education of these students. It simply means that the ultimate responsibility for the education of all students in a classroom resides with the classroom teacher in charge.

For inclusion to work, educational practices must be child-centered. This means that teachers must discover where each of their students are academically, socially, and culturally to determine how best to facilitate learning. Indeed, child-centered teachers view their role more as being facilitators of learning rather than simply transmitters of knowledge. Therefore, skills in curriculum-based assessment, team teaching, mastery learning, assessing learning styles (and modifying instruction to adapt to students' learning styles), other individualized and adaptive learning approaches, cooperative learning strategies, facilitating peer tutoring and "peer buddies," or social skills training are important for teachers to develop and use in inclusive classrooms. Soffer (1994) emphasizes that these are not just good special education practices, but are good practices for all teachers.

The remaining term needing definition is full inclusion. Though many use inclusion and full inclusion interchangeably, others make distinctions. Those who advocate for full inclusion believe "that instructional practices and technological supports are presently available to accommodate all students in the schools and classrooms they would otherwise attend if not disabled" (Rogers, 1993, p. 2). Consequently, according to full inclusion advocates, it is very seldom, if ever, appropriate for a special education student to be outside the mainstream classroom setting. On the other hand, there are inclusion supporters who believe that numerous intervening variables make such an "absolutist" stand to be dangerous and irresponsible. According to them, the unique nature of individual disabilities, the school context, the
capacity of teachers in terms of training and experience, and the availability of resources should all be taken into consideration before determining appropriate placement. However, they believe that all schools should be moving toward the greater inclusion of students with disabilities into mainstream classroom settings.

To summarize these terms as used in reference to special education, mainstreaming generally refers to the physical placement of students with disabilities with their non-disabled peers. The assumption is that their disabilities are able to be accommodated with relatively minimal modifications. Integration is primarily a legal term connoting the actual assimilation of different groups together (disabled and non-disabled), rather than just the facilitation of physical proximity. This may require more than minor modifications. Inclusion is the more popular educational term referring to the move to educate all children, to the greatest possible extent, together in a regular classroom setting. It differs from the term full inclusion in that it also allows for alternatives other than the regular classroom when more restrictive alternatives are deemed to be more appropriate.

**Underlying Assumptions Surrounding Greater Versus Lesser Inclusion**

Perhaps the strongest argument for greater inclusion, even full inclusion, comes from its philosophical/moral/ethical base. This country was founded upon the ideals of freedom and equality of opportunity. Though they have not been fully achieved, movement toward their fuller realization continues. Integration activists point to these ideals as valid for those with disabilities, too. Even opponents agree that the philosophical and moral/ethical underpinnings for full inclusion are powerful. For instance, Lieberman (1992) points out that... The arguments speak in ideals for all humanity. Images are presented that show friendship, loyalty, togetherness, unity, helpfulness without monetary compensation, care-giving from the heart, building a society based on mutuality of interest. As my fellow man goes, so go I. Only a cynic would take this on. (p. 13)

Jay Heubert (1994) suggests that there are several points on which proponents and opponents of inclusion agree. There is general consensus that, with appropriate staff development and support, more students with mild disabilities could be served in regular classrooms. It is also generally believed that better research, improved coordination of services between special and regular education, and administrative support are crucial for serving students with disabilities.

Heubert (1994) also outlines some of the major philosophical assumptions that proponents and opponents hold relative to their attitudes about inclusion. Those who favor greater inclusion view labeling and segregation of students with disabilities as bad. They do not view those with disabilities as distinctly different from others, but rather limited in certain abilities (everyone simply has strengths and weaknesses that vary from person to person). According to these inclusion proponents, segregated special education services are too expensive, disjoint, and inefficient. They believe that many who have been identified as being disabled are actually not disabled at all. They also believe that those students who are disabled can be best served in mainstream classes because:

- Teachers who have only low-ability students have lower expectations;
- Segregated programs tend to have "watered-down" programs;
- Students in segregated programs tend not to have individualized programs;
- Students in segregated programs tend to stay in segregated programs;
- Most regular education teachers are willing and able to teach students with disabilities; and
- The law supports inclusive practices.

In contrast, those who prefer to maintain special education students in resource rooms, special classrooms, or other, more restrictive settings believe that labeling students is not bad if the labels are accurate and lead to providing appropriate services. They believe that students with disabilities are distinctly different from their non-disabled peers and, therefore, need different, specialized services. They fear that the reason many are "pushing" inclusion is to save money (special education services are costly). Inclusion opponents believe that special education identification services are sophisticated and generally reliable. According to Huebert (1994), they also believe many or most students with disabilities are better served outside the mainstream classroom setting because:

- Special education teachers have higher expectations for their students;
- Special education curricula are appropriate for their intended students;
- Individualization is more likely to occur in smaller classes with specialized teachers than in the regular classroom;
- Regular teachers do not want special needs students in their classrooms; and
- Students with disabilities have never been well-served in regular education, and there is nothing to indicate that teachers are any more able to deal with them now than they were previously.

**Educational Support for Inclusion**

Supporters argue the educational merits of inclusion from two perspectives. First, the weaknesses of special education, as it currently is structured, are highlighted. Generally speaking, literature reviews of special education efficacy studies suggest "no advantages for special education placements" (Reynolds, 1988, p. 355). More specifically, the National Association of State Boards of Education (1992) reports the following discouraging information:

- 43 percent of students in special education do not graduate;}
• Youth with disabilities have a significantly higher likelihood of being arrested than their non-disabled peers (12 percent versus 8 percent);
• Only 13.4 percent of youth with disabilities are living independently two years after leaving high school (compared to 33.2 percent of their non-disabled peers); and
• Less than half of all youth with disabilities are employed after having been out of school one to two years.

In contrast to these statistics about students with disabilities, the overall high school dropout rate is estimated to be between 18 and 21 percent (McCaul, Donaldson, Coladarci, & Davis, 1992). Further, the overall unemployment rate of high school dropouts in 1992 was 11.4 percent, while students who graduated but did not go on to college had an unemployment rate of 6.8 percent (Kids Count Data Book, 1994).

Another frequent criticism of the current special education system deals with the issue of "labeling effects" on students with disabilities. Inclusion standard-bearers suggest that the very act of labeling a student as "special" frequently lowers expectations and self-esteem (Will, 1986). Further, special education placement in "pull out" programs "has [all too often] left many students with fragmented educations and feeling that they neither belong in the general education classroom nor the special education classroom" (National Association of School Boards of Education, 1992). The impact of such stigmas, lowered expectations, and poor self-esteem on school learning is significant (Lipsky & Gartner, 1992).

Stainback, Stainback, and Bunch (1989) criticize the current special education system as inefficient. They suggest that schools have had to organize a separate system for their students with disabilities. This dual system spends considerable time, money, and effort ... to determine who is 'regular' and who is 'special' and into what 'type' or category of exceptionality each 'special' student fits. This continues to be done in spite of the fact that a combination of professional opinion and research indicates that classification is often done unreliably, that it stereotypes students, and that it is of little instructional value. (p. 18)

The separate administrative arrangements for special programs contribute to a lack of coordination, raise questions about leadership, cloud areas of responsibility, and obscure lines of accountability within schools ... The problem at the building level is further compounded by special program teachers working ... in resource rooms. This isolation minimizes communication between special teachers and regular classroom teachers, resulting in a lack of coordination between ongoing classroom instruction and the specially designed remedial instruction. (Will, 1986, pp. 8-9)

Further, because of specific eligibility criteria, some students "fall through the cracks."

Finally, Stainback, Stainback, and Bunch, and others (National Association of State Boards of Education, 1992) suggest that this dual system does not adequately prepare students with disabilities for the "real world," because the "real world" is not divided into "regular" and "special." Consequently, segregated placements with limited interactions between those with disabilities and their non-disabled peers further handicap special education students.

Taken together, these arguments regarding the overall weakness of current special education practices are compelling.

Given the weak effects of special education instructional practices and the social and psychological costs of labeling, the current system of special education is, at best, no more justifiable than simply permitting most students to remain unidentified in regular classrooms and, at worst, far less justifiable than regular classroom placement in conjunction with appropriate in-class support services. (Skrtic, 1991, p. 156)

The second educational argument is that "there is now substantial evidence that most, if not all, children with disabilities, including children with very severe disabilities, can be educated appropriately without isolation from peers who do not have disabilities" (Ringer & Kerr, 1988, p. 6). A substantial body of research on school district efforts at inclusion, primarily in the form of case studies, now exists. Although these studies are criticized by full inclusion opponents as more anecdotal than good research, the overall impact of these studies has tended to provide additional momentum for the inclusion movement. According to Lewis (1994), students with disabilities in inclusive environments "improve in social interaction, language development, appropriate behavior, and self-esteem" (p. 72). Inclusion supporters also suggest that as regular and special education faculty work cooperatively together in integrated settings, their coordinated work tends to raise their own expectations for their students with disabilities, as well as student self-esteem and sense of belonging. One additional argument frequently proposed for the further integration of those with disabilities into mainstream classes is that, by interacting with their disabled peers, students will have opportunities to develop positive attitudes toward, tolerance of, understanding of, and true friendships with those who are different from themselves. Indeed, studies show that the general student population are more accepting, understanding, and socially aware of differences when they are incorporated into integrated classroom settings (Staub & Peck, 1994-1995; McGregor, 1993).

**Concerns About and Arguments Against Inclusion and/or Full Inclusion**

**From regular education.**

Not everyone is excited about bringing students with disabilities into the mainstream classroom setting. Tornillo (1994), president of the Florida Education Association United, is concerned that inclusion, as it all too frequently is being implemented, leaves classroom teachers without the resources, training, and other supports necessary to teach students with disabilities in their classrooms. Consequently, "the disabled children are not getting appropriate, specialized attention and care, and the regular students' education is disrupted constantly." He further argues that
inclusion does not make sense in light of pressures from state legislatures and the public at large to develop higher academic standards and to improve the academic achievement of students. Lieberman (1992) agrees:

We are testing more, not less. We are locking teachers into constrained curricula and syllabi more, not less. The imprint of statewide accountability and government spending [is increasingly] based on tangible, measurable, tabulatable, numerical results ... The barrage of curriculum materials, syllabi, grade-level expectations for performance, standardized achievement tests, competency tests, and so on, continue to overwhelm even the most flexible teachers. (pp. 14-15)

By expanding the range of ability levels in a classroom through inclusion, Tornillo (1994) argues, teachers are required to direct inordinate attention to a few, thereby decreasing the amount of time and energy directed toward the rest of the class. Indeed, the range of abilities is just too great for one teacher to adequately teach. Consequently, the mandates for greater academic accountability and achievement are unable to be met.

A poll conducted by the American Federation of Teachers (AFT) in West Virginia revealed that "78 percent of respondents think disabled students won't benefit from [inclusion]; 87 percent said other students won't benefit either" (Leo, 1994, p. 22). Citing numerous concerns expressed by many of its national membership, the AFT has urged a moratorium on the national rush toward full inclusion. Their members were specifically concerned that students with disabilities were "monopolizing an inordinate amount of time and resources and, in some cases, creating violent classroom environments" (Sklaroff, 1994, p. 7). They further cite that when inclusion efforts fail, it is frequently due to "a lack of appropriate training for teachers in mainstream classrooms, ignorance about inclusion among senior-level administrators, and a general lack of funding for resources and training" (p. 7). One additional concern of the AFT and others (Tornillo, 1994; Leo, 1994) is a suspicion that school administration motives for moving toward more inclusive approaches are often more of a budgetary (cost-saving) measure than out of a concern for what is really best for students. If students with disabilities can be served in regular classrooms, then the more expensive special education service costs due to additional personnel, equipment, materials, and classrooms, can be reduced. "But supporters [argue] that, while administrators may see inclusion as a means to save funds by lumping together all students in the same facilities, inclusion rarely costs less than segregated classes when the concept is implemented responsibly" (Sklaroff, 1994, p. 7).

From special education.

Regular educators are not the only ones concerned about a perceived wholesale move toward full inclusion. Some special educators and parents of students with disabilities also have reservations. The Council for Exceptional Children (CEC), a large, international organization of special educators, parents, and other advocates for the disabled, issued a policy statement on inclusion at their annual convention in 1993. This statement begins with a strong endorsement for a "monopolizing an inordinate amount of time and resources and, in some cases, creating violent classroom environments" (Sklaroff, 1994, p. 7). They further cite that when inclusion efforts fail, it is frequently due to "a lack of appropriate training for teachers in mainstream classrooms, ignorance about inclusion among senior-level administrators, and a general lack of funding for resources and training" (p. 7). One additional concern of the AFT and others (Tornillo, 1994; Leo, 1994) is a suspicion that school administration motives for moving toward more inclusive approaches are often more of a budgetary (cost-saving) measure than out of a concern for what is really best for students. If students with disabilities can be served in regular classrooms, then the more expensive special education service costs due to additional personnel, equipment, materials, and classrooms, can be reduced. "But supporters [argue] that, while administrators may see inclusion as a means to save funds by lumping together all students in the same facilities, inclusion rarely costs less than segregated classes when the concept is implemented responsibly" (Sklaroff, 1994, p. 7).

The concept of inclusion is a meaningful goal to be pursued in our schools and communities ... [C]hildren, youth, and young adults with disabilities should be served whenever possible in general education classrooms in inclusive neighborhood schools and community settings. (CEC policy ..., 1993)

Clearly, the concern of this broad-based advocacy organization is not so much with inclusion as with full inclusion. However, some parents of children with disabilities and others have serious reservations about inclusive educational practices. Their concerns are forged out of their struggles to get appropriate educational services for their children and those of others. They are concerned that, with the shift of primary responsibility for the education of these children from special education teachers to regular classroom teachers, there will be a loss of advocacy. Further, by dispersing children with special needs across the school campus and district, services and resources will be "diluted," and programming will be watered down. Indeed, like many in regular education, special education advocates assert that in some instances educational programming in a regular classroom setting may be totally inappropriate for certain individuals. They acknowledge that the ideals on which inclusion rests are laudatory. However, they remain skeptical that the present overall, broad-based capacities and attitudes of teachers and school systems toward accommodating students with disabilities into regular classrooms is adequate. They argue that the current special education system emerged precisely because of the non-adaptability of regular classrooms and that, since nothing has happened to make contemporary classrooms any more adaptable ..., [inclusion] most likely will lead to rediscovering the need for a separate system in the future. (Skrtic, 1991, p. 160)

In addition to a more generalized concern by some across the field of special education in relation to how inclusive practices become operationalized in schools, stronger concern about and resistance to inclusion has been raised within specific disability groups. Perhaps the greatest concern and opposition comes from many in the deaf community. Cohen (1994) is one of many who suggest that inclusion is inappropriate for most students with hearing impairments. He notes that "communication among peers is crucially important to the cognitive and social development for all children" (p. 35). However, because "most deaf children cannot and will not lip-read or speak effectively in regular classroom settings ..., full access to communication-and therefore full cognitive and social development-includes the use of sign language" (p. 35). He points to supportive research suggesting that greater intellectual gains are made by deaf students enrolled in schools for the hearing impaired, where a common language and culture may be shared, than for similarly disabled students in mainstream classroom settings. Even with an educational sign-language interpreter (of which there is a shortage throughout the United States), students with impaired hearing miss out on many of the experiences targeted as rationales for inclusive environments by inclusion advocates (e.g., a sense of belonging, opportunities to interact with
peers). Social, emotional, and even academic development is difficult when communication must be facilitated through an interpreter. Informal communications and friendships with peers, participation in extracurricular activities, dating, etc. are also not well-facilitated when a third-party interpreter is needed to communicate. Consequently, many argue that the more appropriate educational placement option for the hearing impaired is a residential school with a "community" of others similarly disabled.

Lieberman (1992) points out that many advocates (primarily parents) for those with learning disabilities also have significant concerns about the wholesale move toward inclusion. Their concerns stem from the fact that they have had to fight long and hard for appropriate services and programs for their children. They recognize that students with learning disabilities do not progress academically without individualized attention to their educational needs. These services have evolved primarily through a specialized teacher working with these students individually or in small groups, usually in a resource room setting. Many successful practices have been researched and identified (Lyon & Vaughn, 1994). Special education professionals and parents alike are concerned that regular education teachers have neither the time, nor the expertise to meet their children's needs. "The learning disabilities field seems to recognize that being treated as an individual can usually be found more easily outside the regular classroom" (p. 15).

Some parents of students with more severe disabilities are concerned about the opportunities their children will have to develop basic life skills in a regular classroom setting. They are also cautious about inclusion because of fears that their children will be ridiculed by other students.

The issue of inclusion is also passionately debated in one other area of exceptionality-students who are gifted/talented. It is discussed under the concept of "heterogeneous grouping" rather than "inclusion." However, the issue is still one of providing appropriate services in an integrated versus a segregated setting. Some advocate, with research support, that gifted students are better served when they are able to work with other gifted students (usually in a "pull-out" program). Others promote, also with research support, the position that gifted students benefit more from being heterogeneously grouped with other students of various levels of ability (Tompkins & Deloney, 1994). Sapon-Shevin (1994) points out that "students who have been identified as 'gifted' or as 'disabled' need not be segregated from others in order to have their needs met, nor dumped with others without differentiation or appropriate treatment" (p. 8). However, their parents and other advocates have fought for specialized services (occurring in segregated settings), and they are reticent to allow what is perceived as a move backward.

Input from Legislation and Litigation

Legally, integration is a civil rights issue, not a philosophical or educational trend. Federal courts have made clear that if a child can "feasibly" be integrated, segregation is illegal, regardless of the school district's philosophical perspective on integration. (Ringer & Kerr, 1988)

As mentioned previously, parents of children with disabilities, advocacy groups, and others became more vocal and politically active in the 1950s and 1960s. Court decisions and legislative efforts began to change the way America treated its disabled. Their efforts were significantly strengthened with the passage of the Education for All Handicapped Children Act (PL 94-142). This act, signed into law by Gerald Ford in 1975, embraced two hallmark components for children with identifiable disabilities. It mandated that all children were to be afforded a "free appropriate education." Further, this public education was to be delivered in the "least restrictive environment." Since then, schools, parents, and others have struggled with finding the balance between the appropriateness of educational services and the location/environment in which those services are found. Essentially, inclusion is primarily an issue addressing this second component of least restrictive environment.

The Individuals with Disabilities Education Act of 1990 (PL 101-476), which updated PL 94-142, further strengthened these two components by strongly encouraging that students with disabilities be educated in their home-school, regular-education classroom whenever possible. Specifically, it mandates:

- To the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are non-disabled;
- Special classes, separate schooling or other removal of children with disabilities from the regular educational environment occur only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily; and
- The educational placement of each child with a disability is as close as possible to the child's home.


It should be noted that the law does not abolish all settings except the regular classroom. Indeed, it requires more restrictive alternatives when the regular classroom has been shown to be inappropriate, thus the need for a continuum of placement options from the regular classroom to institutionalization. However, the intent of the law is that the rightful place for educating students, regardless of special need, is with neighborhood peers in a regular education classroom setting unless that setting is inappropriate. "In plain language, these regulations appear to require that schools make a significant effort to find an inclusive solution for a child" (Rogers, 1993, p. 2). But just how far are schools required to go? In recent years, several decisions indicate that the courts are giving more serious consideration to the inclusion of children with even severe disabilities in mainstream education. However, none of the decisions has ordered full inclusion, and several have alluded to the possibility that mainstream education may not be appropriate as a given
student advances through school. Currently, the legal system is depending heavily on the reasoning in Daniel R.R. v. State Board of Education (1989) to make decisions regarding inclusion.

Daniel R.R. was a six year-old boy who had been identified for special education because of moderate retardation. His developmental age was between two and three years. He was placed in a pre-kindergarten for half a day and a special education class for half a day. However, when Daniel's kindergarten teacher reported that he was not succeeding because he required almost constant attention and was not mastering skills, the school wanted to remove Daniel from the regular classroom and place him in special education full time. The parents protested the change in placement and requested a hearing. Because Daniel was found to be receiving very little educational benefit from the regular class and was diverting too much of the teacher's time, the hearing officer found for the school district. The case was taken to the district court, which affirmed the hearing officer's decision. The parents then appealed to the Fifth Circuit Court of Appeals. In deciding the case, the Circuit Court developed a two-pronged test to determine if the district's actions were in compliance with the Individuals with Disabilities Education Act (IDEA):

- Can education in the regular classroom with the use of supplemental aids and services be achieved satisfactorily?
- If it cannot, has the school mainstreamed the child to the maximum extent appropriate?

Because the court found that the district had tried several alternatives to accommodate Daniel in the regular class, it determined that the district had complied with the mainstreaming preference expressed in IDEA and affirmed the decisions of the hearing officer and the district court.

The Daniel R.R. test has been used to decide whether a school district is meeting the letter and the spirit of the IDEA’s stated preference for mainstreaming in such highly visible cases as Greer v. Rome City School District (1991), Oberti v. Board of Education of the Borough of Clementon School District (1993), and Board of Education, Sacramento City Unified School District v. Rachel Holland (1992, 1994). Particularly in the latter decision, the court further refined the first "prong" of the Daniel R.R. test to include four factors that schools must consider before removing a student to a more segregated setting:

- Academic benefit-To what degree is the child benefiting academically from placement in a regular classroom setting?
- Nonacademic benefit-To what degree is the child benefiting in nonacademic ways from placement in a mainstream setting (e.g., language development, appropriate behavior models, social development)?
- Classroom management-To what degree is the child disruptive to other students or to what degree is the teacher's time being occupied with the student with a disability to the detriment to other students? [The issue of employing supplemental aids and services (equipment, technological, and human) must be taken into consideration.]
- Cost-What is the financial burden placed on the school district relative to the mainstreamed child versus a more segregated placement?

It appears that the current wisdom of the courts is relying on schools to weigh and balance these factors in making placement decisions "in good faith." Based on the facts of these cases and the resulting decisions, school districts may improve decision making or, in some cases, simply strengthen their positions in the case of disputes through consciously attending to the following considerations:

- What modifications and supports in a regular class have been considered and/or tried before a decision is made to segregate a student with disabilities from mainstream education?
- When a child is removed from the mainstream, has each subsequent possible placement in the continuum of services been considered and/or tried in order that the child is as close to the mainstream as possible?
- Are physical, emotional, and social hardships being placed on a child who must move back and forth between the mainstream and special education?
- Are there identifiable and coherent relationships between a student's IEP goals, placement, and activities?
- What benefits can be provided in special education that cannot be provided in the mainstream?
- What are the underlying assumptions regarding the kind of instruction identified as needed for a child to be a successful participant in life? Are these assumptions based on the highest expectations for the child?

So What's A School Leader To Do?

The support for a more inclusive approach to providing special educational services is significant. America's most basic values of freedom and equality of opportunity for everyone, the weight of significant educational research, and numerous legal mandates/court decisions are all on the side of greater inclusion. However, full inclusion, as outlined above, may be too extreme in that it actually does not allow for more restrictive educational alternatives for students whose educational needs may not be appropriately met in a regular classroom setting.

On the other hand, there is widespread concern about the attitudes and capacity of teachers and school organizations to provide appropriate educational services in regular classrooms across America to those who are not typical, mainstream, classroom students. These concerns are primarily focused on the following issues:
• Classroom teacher expertise to construct and deliver appropriate educational services to those with disabilities efficiently and effectively;
• Classroom teacher and school administrator attitudes toward working with students with disabilities;
• Classroom teacher expertise to deal with inappropriate behaviors;
• The potential lowering of quality of educational services to all students; and
• Inadequate material, curricular, technological, and human resources.

Before a school plunges headlong into such a major restructuring effort as greater inclusion, the above concerns must be adequately addressed. School leaders must put careful time and effort into the planning and implementation process. In earlier editions of Issues ... about Change (viz., Hord, 1991; Boyd, 1992), factors that increase the likelihood of implementing a significant change successfully have been identified and discussed. Specifically, school leaders must attend to six areas of concern:

• Developing and articulating a clear, shared vision of the change;
• Planning and providing for necessary resources;
• Identifying and providing staff development and training to develop the skills needed to support and carry out the change;
• Monitoring and evaluating (including monitoring of evolving personnel concerns about the change through the implementation process);
• Providing ongoing consulting, coaching, and staff development to further enhance staff capacity to accomplish the goals of the targeted change; and
• Working to create a school context that supports change.

In the case of implementing a more inclusive approach to providing special education and other specialized services in the regular classroom, several of these leader actions are important. School leaders must work diligently to develop and impart a clear vision of what an inclusive classroom looks like and how it functions. They must give significant attention to providing the kinds of ongoing staff development that expands the capacity of both regular and special education teachers to serve students with a variety of disabilities in a mainstream setting (e.g., cooperative learning strategies, team teaching skills, collaborating/team-building skills, individualizing instruction, mastery learning, identifying and adapting to different learning styles). Resources must be provided, including time for collaborative planning, support personnel that might be necessary, materials, and assistive technologies. Finally, school leaders must be mindful of the changing concerns that their staff, parents, and others have as greater inclusion begins to be implemented. By attending to these issues, a more inclusive educational system is possible.

Resources for Further Information

The December 1994/January 1995 issue of Educational Leadership, published by the Association for Supervision and Curriculum Development (ASCD), is fully devoted to issues surrounding inclusion.

The Institute on Community Integration
109 Pattee Hall
150 Pillsbury Dr., SE
Minneapolis, MN 55455
612-624-4512

The Peak Parent Center
6055 Lehman Dr., Suite 101
Colorado Springs, CO 80918
719-531-9400

The Arc (formerly the Association for Retarded Citizens)
National Headquarters
500 East Border Street, Suite 300
Arlington, Texas 76010
817-261-6003

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