

## Inclusion Reconsidered

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Inclusion is an educational placement strategy in which all students with special needs are placed in the regular education classroom for their entire educational program. This essay begins with a brief conceptual analysis of inclusion: the contrast between the radical strategy of inclusion with the more traditional strategy of mainstreaming and a more recent strategy that can be called integration will be developed. Inclusion will be seen as representing an extreme shift in how schools approach meeting the needs of students with disabilities. This essay develops the argument that an inclusion strategy does not satisfy the legislative mandate that all special education students have a right to a free, appropriate public education in the least restrictive environment. This essay also argues that the strategy's focus on social skills over academic skills misconstrues the nature of distributive justice: there are different reasons for classifying students and those other than lot-regarding equality are not, by their nature, unjust. Inclusion has simply failed to take into account the circumstantial nature of distributive justice and, as a result, does not recognize that such lot-regarding equality is not the only form of justice relevant to the goal of providing an appropriate education.

### WHAT IS INCLUSION?

There are many different accounts of what an inclusion strategy and this creates a difficulty when analyzing what people mean when they speak of inclusion. The best account of inclusion is one that sets it apart from other more traditional practices of student placement by capturing its distinct values and beliefs. Inclusion is not simply another name for educating students with disabilities in regular education classrooms, nor is it merely a staff or building restructuring strategy. This essay understands inclusion as an educational philosophy that places a high value on the acquisition of social skills and holds that segregating students inhibits this acquisition. To eliminate any and all segregation, inclusion prescribes regular classroom placements for all students and correspondingly proscribes, or eliminates, all options for alternative placement. In the following sections, three placement strategies for students with disabilities are presented in an effort to distinguish inclusion.

### MAINSTREAMING

The first student placement strategy to consider, placing children with disabilities into the regular education classroom for some portion of their educational program, has generally been identified as mainstreaming. Spencer Salend defines this practice:

mainstreaming (is) the carefully planned and monitored placement of students into regular education classrooms for their academic and social educational program. In this definition, the primary responsibility for the mainstreamed student's academic program lies with the regular education teacher.<sup>1</sup>

Mainstreaming uses little or no special services or support in the regular education classroom and, although there is still the option of going outside the

regular classroom for help, the regular education teacher in the classroom is primarily responsible for the student's progress.

Mainstreaming is rooted in the concept of the least restrictive environment (LRE), a legal mandate for educating students with disabilities with their peers without disabilities to the maximum extent possible, and the term is traditionally used relative to a continuum of placement options. This continuum extends from what is considered the most restrictive placement, such as an institution or special school, to intermediate placements such as special classes or resource room options, and finally to the least restrictive placement of a regular classroom placement. The goal is to place the student in the least restrictive environment that can still meet his educational needs.

Mainstreaming is not a radical strategy as it reflects the established educational practice of matching an educational program and classroom placement with an individual's needs and abilities. Much literature and discussions about inclusion, on the other hand, mandate placement in the regular education classroom regardless of the individual needs or abilities of the student. Educational placements become the same for all students, with regular classroom placement being seen as the only "fair, ethical, and equitable thing to do... a basic right, not something one has to earn."<sup>2</sup>

There is thus a great difference between the underlying concepts of mainstreaming and inclusion as they relate to placement decisions. Mainstreaming is not simply a watered down version of inclusion, and using these two terms synonymously is not only confusing but fails to highlight the philosophical differences that many educators and disability advocates wish to emphasize.

#### INTEGRATION AND THE REGULAR EDUCATION INITIATIVE

The second student placement strategy to consider is one that envisions a transformed educational setting where special education and regular education are redefined by emphasizing their common aims (this account owes much to Madeleine Will, Assistant Secretary for the Office of Special Education and Rehabilitation Services [OSERS] in the Reagan administration, and her Regular Education Initiative of 1984 [REI]).<sup>3</sup> Although this approach argues that most students should be placed in the regular education classroom, the primary goal for placement decisions is to improve students' levels of academic achievement.

The term "integration" has been used when describing the placement of special education students into regular education classrooms where special services can follow the student into the classroom. Unlike a mainstreamed environment, where the regular classroom teacher is mostly responsible for the student's progress, in an integrated environment, or what some call a "blended" classroom environment, students can still receive special services both in the regular education classroom as well as in resource rooms or using other pull-out type modalities.

Compared to inclusion's often distinct focus on social skills and benefits, integration and the REI model conceive of individual educational objectives and placements in terms of academic achievement. Although integration calls for a reorganization of some of the fundamental educational structures in schools, by establishing team teaching models and a merging of regular and special education

settings, the strategy nevertheless continues to recognize the principle that students with disabilities require a range of options for their educational placement and that a student's placement needs to be appropriate to his individual needs and abilities. This recognition that individual placements may vary is precisely what sets this transformational approach apart from the more radical approach known as inclusion.

#### INCLUSION: A RADICAL STRATEGY

Inclusion is the placement strategy in which all students are placed in the regular education classroom for their entire educational program. The goal is the elimination of the continuum of placement options as all services and support are brought to the student in the regular classroom. Susan Stainback and William Stainback explain, "(a)n inclusive school is one that educates all students in the mainstream.... Experience has shown that it is possible to have a mainstream that meets everyone's needs *if* ample support and assistance is provided to both teachers and students in regular education classes."<sup>4</sup> The Stainbacks' notion comes with the corresponding belief that it is possible to train teachers and equip schools to provide an appropriate education to all students in regular classrooms.

What the Stainbacks want is to change the educational environment in a way that eliminates special education as it is currently practiced. Their view is that segregating students on any basis is wrong, that all children, whatever their needs and abilities, have a right to an equal education. They envision a kind of lot-regarding equality in which all students are educated in the same environment regardless of any differences between them. Equitable education, what Douglas Rae might consider person-regarding equality, in which a student's placement reflects individual abilities, is not equal education using this understanding and is therefore not appropriate.<sup>5</sup> A needs based approach would not be appropriate either. Inclusion should thus be considered a radical educational perspective or philosophy, one that is focused almost exclusively, not on the outcome of the educational process as measured in academic achievement, but on how to achieve equality simply through classroom placement. The process of putting children with special needs into the regular education classroom is the overriding concern of inclusion. The following section looks at whether inclusion does, in fact, satisfy the mandates of current legislation.

#### THE LEAST RESTRICTIVE ENVIRONMENT ARGUMENT

The Individuals with Disabilities Education Act's (IDEA's) express purpose was to:

assure that all children with disabilities have available to them... a free appropriate public education which emphasizes special education and related services designed to meet their uniqueness, to assure that the rights of children with disabilities and their parents or guardians are protected, to assist states and localities to provide for the education of all children with disabilities, and to assess and assure the effectiveness of efforts to educate children with disabilities.<sup>6</sup>

To meet this goal, IDEA mandated a number of requirements, three of which are relevant to the concept of inclusion being elaborated here. First, the so-called *zero reject principle* mandates that *all* students with disabilities are entitled to a free appropriate public education (FAPE). Second, the least restrictive environment

(LRE) requirement directs that all students with disabilities be educated with their peers without disabilities to the maximum extent appropriate. Third, related services that are required by a student with a disability in order to benefit from education must be provided. (Related services might include any therapies, transportation, aides, technology, deemed necessary.) Given these three mandates, an argument for inclusion might read as follows:

The Least Restrictive Environment Argument for Inclusion

*Premise One:* IDEA establishes that everyone has a legal right to a free appropriate education, that any such education should take place in the least restrictive environment, and that students must be given sufficient supplemental support.

*Premise Two:* States are thus legally obligated to give all students a free appropriate education in the least restrictive environment, and must give students sufficient supplemental support.

*Premise Three:* The regular classroom is the least restrictive educational environment.

*Premise Four:* All students can be appropriately educated in the regular classroom when given sufficient supplemental support.

*Conclusion One:* Therefore, the regular classroom is the least restrictive educational environment for all students.

*Conclusion Two:* Therefore, states are legally obligated to place all students in regular classrooms.

A troubling feature of this argument is that the conclusion seems to contradict, to some extent, what has been called the centerpiece of IDEA, that each student with a disability must be given an individualized education program (IEP) that adjusts the educational program to individual needs.<sup>7</sup> An obligatory regular classroom placement simply denies any matching of an individual student's needs with appropriate placement. As it is formulated here, the argument breaks down at premise four, the assumption that the school can provide enough supplemental support to enable all students with disabilities to be appropriately educated in the regular classroom.

Premise four just does not appear to be necessarily true or obvious. Many professionals in the field of special education, including such special education notables such as James Kauffman and Daniel Hallahan, have argued against just such a notion.<sup>8</sup> In the field of special education as it has developed, the availability of placement options is a significant feature of providing an appropriate education that meets a student's unique needs. For example, students who are deaf or hard-of-hearing often benefit substantially from developing fluency in American Sign Language (ASL). Many advocates for this population stress placing deaf and hard-of-hearing students together, usually in special schools or classes, so that they can be part of a community of students with similar disabilities. This community atmosphere will not only help students learn ASL better, surrounded by other speakers of the same language, but also provide a network of support for other common issues that deaf and hard of hearing students face. Yet, inclusion as a placement strategy would preclude any such placement option.

The deaf and hard of hearing are not the only students with disabilities that benefit from a segregated placement in school. Many of the same arguments apply to students with visual limitations — a school community oriented around students with visual limitations may provide benefits that are just not possible in a regular, heterogeneous, classroom setting. Students with serious emotional disturbances can also be identified as likely to profit from a more restricted environment, in this case one that provides increased direction and structure. Students with learning disabilities benefit from pull-out services, as often the change of environment from a regular classroom to a resource room may help promote concentration and on-task behavior. Arguments can also be made for other student populations as well, such as those with mental retardation, autism, multiple physical handicaps, and the preclusion of individualizing placement options for these students seems not only to be contrary to IDEA but also not in the best interests of the student.

While the inclusion argument outlined above is valid — the conclusion that the state is obligated to place all students in the regular classroom would follow if the premises were true — it is not the case that premise four is true. There are, as I have sketched out above, good reasons to think it is false. Therefore the argument should be rejected. The rejection of this argument does not, however, show that the conclusion is false, only that the argument is weak.

Although the argument's weakness does not falsify the conclusion in and of itself, the rejection of premise four does indeed raise concerns about the possibility of the conclusion being true when viewed from a different perspective. If it is false that all students can be appropriately educated in the regular classroom, there is reason to deny that states have an obligation to place all students in the regular classroom. If it is not possible to educate all students in regular classrooms and states are legally obligated to give all students a free appropriate education (premise Two) then states would be obligated to provide other placements and would not be at liberty to place all students in regular classrooms. Consequently, states could be under no obligation to place all students in regular classrooms.

Inclusion advocates might counter, however, that the above argument misconstrues the meaning of what an appropriate education actually is. Advocates of the placement strategy of inclusion argue that social skills are the most important skills to acquire and can only be acquired in a classroom with regular education students. Then since states can provide such an equality of classroom environments, states are thus obliged to do so. Opponents of such radical inclusion, however, contend that academic skills and achievement are necessary and legitimate considerations for defining an appropriate education. What is at stake here is not only the nature of an appropriate education but the eventual well-being of the students themselves.

#### THE EQUALITY ARGUMENT

Proponents of inclusion have typically used arguments about the inherent inequality of separate educational facilities to substantiate their position that any separate placement of students with disabilities outside of the regular classroom is inherently unequal, discriminatory, and will result in substandard education. For example, Katie Blenk contends that:

inclusive education, when it is done right and incorporates appropriate supportive services, can work well for all children.... [I]t rests on universal recognition of the need to rethink and restructure traditional education models of service delivery.<sup>9</sup>

She argues that environmental equality is necessary, quoting the Supreme Court's *Brown versus Board of Education of Topeka, Kansas*, decision:

In the field of public education the doctrine of "separate but equal" has no place. Separate educational facilities are inherently unequal....(I)n these days it is doubtful that any child may reasonably be expected to succeed in life if he is denied the opportunity of an education... such an opportunity, where the state has undertaken to provide it, is a right which must be made available to all on equal terms.<sup>10</sup>

Stainback and Stainback also quote the *Brown* decision to support the inclusionist claim that since social skills are paramount in a student's education, and separate placement decisions result in an unequal chance for the development of social skills, then consequently schools must place all students in the same classroom.

(Separateness in education can) generate a feeling of inferiority as to (the children's) status in the community that may affect their hearts and minds in a way unlikely ever to be undone. This sense of inferiority...affects the motivation of a child to learn...(and) has a tendency to retard...educational and mental development.<sup>11</sup>

Inclusion advocates argue that the *Brown* decision's prescriptive remedy for racial discrimination should apply to any and all categories of students. The argument is that students with disabilities are stigmatized by separate educational placement, and that this stigmatization is wrong just as the stigmatization of African-American students was wrong.

#### The Equality Argument for Inclusion

*Premise One:* Separate education is inherently an unequal education: it is stigmatizing and retards social skills.

*Premise Two:* All students should be given an equal education — to do otherwise would be wrong.

*Conclusion One:* Therefore, no students should be given a separate education.

*Premise Three:* A separate education is any education outside of a regular classroom.

*Conclusion Two:* Therefore, all students should be given an education in a regular classroom.

On the face of it, this argument does seem to be supported by *Brown*. Since the thrust of the *Brown* decision is that it is simply unfair or unjust to deprive a specific category of students their right to an equal education, and that an equal education can only take place in non-segregated facilities and classrooms, it might seem to follow that this should apply to students with disabilities as well. But this argument does not take into account two distinctions that are important. First, if we distinguish between classifying students by race and classifying students by need, it will be clear that *Brown* was simply not meant to eliminate all categorical labels but only those based on non-relevant or arbitrary standards. Then, by recognizing that some categorical labels are acceptable and necessary, and that our notions of distributive justice can be relative to circumstances, we can discriminate on one hand between the *Brown* decision's concept of justice as one relating to equality and, on the other hand, an alternative conception of justice as relating to helping others to meet their needs.

Radical inclusion, as I have portrayed it, does not address the distinction between classifying students on the basis of race and classifying students on the basis of need. The *Brown* decision recognized that African-Americans are not limited in their ability to profit from educational instruction in any intrinsic way. For that reason, we can say that there is no legitimate reason to classify them differently from other students and, therefore, it would be unjust to do so.

For students with disabilities, however, the recognition of limitations in profiting from educational instruction is at the basis of their being classified in the first place — they have recognized special needs! Students are classified so that schools may provide appropriate special services to meet their special needs. Since helping students receive educational instruction through provision of such services is a valid educational goal, there is a legitimate reason to allow schools to classify these students. The reason is legitimate because it can be justified by recognizing that classifying does promote a valid educational goal.

By recognizing that students with disabilities have special needs and that these special needs are legitimate criteria for classifying them, we come to a further difficulty in turning the *Brown* argument against racial segregation into an argument against an alternative placement outside of the regular classroom. The concept of fairness or justice, as indicated above, underlies the decision by the Supreme Court and the equal protection of the laws guaranteed by the Fourteenth Amendment. Although the Court based this opinion on the concept of justice as equality, there are other definitions of fairness or justice that might be suitable in different situations.

Morton Deutsch defines the concept of distributive justice as “concerned with the distribution of the conditions and goods which affect individual well-being.”<sup>12</sup> He argues that there is a relation between the well-being of the individuals in a group and the well-functioning of the group as a whole and that justice is intrinsically related to this relationship: “the ‘natural values of justice’ are thus the values which foster effective social cooperation to promote individual well-being.”<sup>13</sup> These values of justice that he calls “essential” are related to cooperation. In fact, he restricts his notion of justice to situations that include some form of cooperative community. The relationship between the individuals and the group will thus depend on the external situation that exists. Consequently, because the distributive values we use may vary depending on the situation, justice must be seen as at least partly circumstantial.

Deutsch distinguishes three particular values of justice: *equality*, *equity*, and *need* all provide a foundation for separate accounts of justice. Equality, which involves everyone getting the same treatment, is relevant to cooperative relations where the fostering or maintenance of social relations is the priority. Equity in cooperative relations, or treating people proportionately to their input, is applicable when economic productivity is a primary goal. Finally, need, or treating people according to their specific requirements, is pertinent in cooperative relations when the “fostering of personal development and personal welfare is the primary goal.”<sup>14</sup>

By distinguishing these three different interpretations of justice, we can see that one can be fair or just and still treat people differently in some respects: different

situations and purposes evoke different kinds of justice. Inclusion advocates argue for the primacy of social skills and relations, and as equality is the value that promotes social relations, they adopt equality as the primary value of justice. Using the above distinction, however, I would argue that the value of justice as equality is not the appropriate value of justice to use relative to schools and student placement.

In situations where personal development and welfare are paramount, Deutsch thinks that adopting any other value than need would be disruptive. People's needs fluctuate and harm may result because the values of equality and equity would not respond to these fluctuating needs.

To allocate resources equally or according to the relative contribution of its members rather than according to need would obviously be disruptive of any group that has as a primary concern the development and welfare of its members. It is apparent that individuals' needs fluctuate and it is unlikely that the need of members will always be equal to one another or proportionate to their relative contributions. Thus, if at a particular time an individual has a need that is important to his survival, development, or well-being, he must have access to the resources for satisfying his need independently of whether doing so is socially equitable or equal in the short run. If he does not, he may suffer an irremediable harm or loss. If he does suffer such a harm, this would be obviously detrimental to the group's concern about his well-being, and also detrimental to his future ability to participate in the group as a competent member.<sup>15</sup>

Deutsch says that need should be the primary value that is considered when "groups and institutions which have as a primary concern the personal development and welfare of their members — the family, hospitals, schools, etc."<sup>16</sup> Obviously, then, the value of justice as related to *need* is particularly relevant in regards to the placement of students *with special needs*.

Although Deutsch's outline of justice is not conclusive, in the sense that he does not prove that his conclusions are the only or even the best ones that can be justified, his remarks suggest that using a conception of justice as equality may be too limited when developing an ethics of inclusion. Any argument for inclusion needs to bolster such a narrow conception of justice with some justification about why equality should be accepted as the primary value of justice to the exclusion of other values. Unless there is some justification for the exclusion of other values of justice relevant to students with special needs, the inclusion argument focusing on equality is unconvincing.

#### CONCLUSION

Advocates of inclusion have accomplished many worthwhile objectives over the past ten years as more students with special needs have been placed into the regular education classroom, and the public has become more accepting of having these students in the same classroom with their children. The thrust of the inclusion argument, however, regardless of these positive benefits, is still not only unsatisfactory but deficient. If we recognize that inclusion, according to its original advocates, is a strategy that demands uniform placement of all students into the regular classroom regardless of their individual needs, then it becomes clear that it is a radical approach to special education and should not be supported by professionals in the field.

I have shown some arguments for inclusion to be weak, and the conclusions unsupported or even contradicted by the premises. Though the regular classroom

may be the least restrictive environment overall, there are limitations for many students with special needs that makes the regular classroom an inappropriate placement option. It is difficult to support an argument that demands a regular classroom placement for a student when that placement seems not only to relinquish a student's right to an individualized educational program but also to be inappropriate because it cannot meet his individual needs. Inclusion advocates' focus on social skills appears to be hostile to the more traditional educators' focus on academic skills and achievement. Finally, the inclusion argument for justice through equality is too narrow and limited in its outlook, while an outline of justice such as Deutsch's suggests that there are many alternative ways of understanding justice that may be equally or more convincing when considering the education of a student with special needs. A balancing of these might argue for mainstreaming or integration rather than inclusion.

The inclusion model has gained a wide prominence in the field of education very quickly, yet the model remains ill-defined in its implementation and practice. Although not all of the results of the movement to an inclusive model have been negative, as was noted, many students' educational programs have suffered because of this one-size-fits-all strategy. This essay has tried to contribute to an analysis of inclusion that is fair and realistic, but more conceptual work needs to be done on this popular and contentious issue.

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1. Spencer Salend, *Effective Mainstreaming: Creating Inclusive Classrooms* (New York: Macmillan, 1994), 12.
  2. Susan Stainback and William Stainback, *Support Networks for Inclusive Schooling: Interdependent Integrated Education* (Baltimore: Paul H. Brookes, 1990), 6-7.
  3. See Madeline C. Will, "Educating Children with Learning Problems: A Shared Responsibility," *Exceptional Children* 53 (February 1986).
  4. *Ibid.*, 20-21.
  5. Douglas Rae, *Equalities* (Cambridge: Harvard University Press, 1981).
  6. IDEA, 20 U.S.C. § 1400(c).
  7. Michael Yell, *The Law and Special Education* (Upper Saddle River, N.J.: Prentice Hall, 1998), 167.
  8. See James Kauffman and Daniel Hallahan, eds., *The Illusion of Full Inclusion: a Comprehensive Critique of a Current Special Education Bandwagon* (Austin, Tex.: Pro-Ed., 1995).
  9. Katie Blenk, *Making School Inclusion Work: A Guide to Everyday Practice* (Cambridge, Mass.: Brookline Books, 1995), 221-2.
  10. *Ibid.*, 205.
  11. Stainback and Stainback, *Support Networks for Inclusive Schooling*, 5.
  12. Morton Deutsch, "Equity, Equality, and Need: What Determines Which Value Will Be Used as the Basis of Distributive Justice?" *Journal of Social Issues* 31 (1975): 137.
  13. *Ibid.*, 140.
  14. *Ibid.*, 145.
  15. *Ibid.*, 147.
  16. *Ibid.*