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# Parents' and Educators' Perspectives on Inclusion of Students with Disabilities

# 16

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## Abstract

We, the authors, support inclusion in public education for most students of diversity, including many (but not all) students with disabilities, because disability is a unique form of diversity that requires special consideration in education. The way that various forms of disability are understood has fundamental implications for framing policies and their

implementation. We briefly review the literature pertinent to parents' advocacy, views of, and attitudes toward inclusion. We also review the literature about teachers' attitudes toward inclusion, focusing on systematic reviews revealing nuanced views of inclusion and not monolithic attitudes. Nuanced views in both parental and teachers' perspectives may indicate that effective instruction and appropriate education (as mandated by law in the USA) should take precedence over the place of instruction (bodily inclusion). We conclude that inclusion based on learning progress and outcomes rather than bodily inclusion in general education should be the primary concern of policy makers because the majority of parents and educators are more concerned about children learning academic and life skills than about where children are taught.

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## Keywords

Inclusion · Students with disabilities · Parent · Teacher

## 16.1 Introduction

The fourth sustainable development goal (SDG 4) of the United Nations Agenda for Sustainable Development includes a specific education goal

and other education-related targets as one of its 17 Sustainable Development Goals (SDGs). SDG 4 aims to “ensure inclusive and equitable quality education and promote lifelong learning opportunities for all” by 2030 (United Nations 2015). We critically analyze what inclusive education may and may not mean for students with disabilities (SWD), their parents, and their teachers. Among the things one or more of us has experienced are: (a) Teaching in general and special education, including students with and without disabilities in various environments;(b) assessing the abilities and needs of children with disabilities; (c) administering general and special education; (d) working with parents, families, and other educators; (e) preparing general and special education teachers; (f) parenting children with disabilities; (g) advocating for fair and effective education for all students; (h) re-searching effective teaching; and (i) having or having had a disability. Taken together, these experiences have influenced our views on inclusion that are discussed in this chapter.

We are supportive of the inclusion of most forms of diversity in education, including many (but not all) children with disabilities. By “inclusion” we mean inclusion of the human body (unless otherwise stated), what Kauffman and Badar (2020) refer to as *habeas corpus* inclusion. Inclusion meaning students being engaged in appropriate, meaningful instruction (what Kauffman and Badar called *proprium instructio*) is one and the same as *habeas corpus* inclusion for most, but not all, diverse students. Habeas corpus inclusion and *proprium instructio* inclusion are distinctly different with respect to students who are diverse by virtue of having a disability.

Disability is a unique kind of diversity that requires responses different from those of all other diversities (Anastasiou and Kauffman 2012). Inclusion does not apply in the same way to all possible forms of diversity when it comes to learning. To assume that disabilities warrant the same thinking and action as any other form of diversity is a mistake. Other mistaken or non-sensical ideas include assertions that special

education is disgraceful. It has even been said to be tainted by or akin to Nazism (see discussion by Ahrbeck and Felder 2021). In response to accusations of disgrace, Zigmond and Kloo (2017) have this to say:

The disgrace is that we have forgotten that special education is supposed to be special and that wherever it is delivered, it is supposed to be different. That’s what we fought for. That’s what makes IDEA [the U. S. law known as the *Individuals with Disabilities Education Act*] different from other civil rights legislation, for minorities, for English language learners, for girls. We fought to have some students with disabilities treated differently, given more opportunity, more intensive instruction, more individually tailored curriculum, more carefully designed instruction. It’s time to renew the commitment to students with disabilities and to ensure the programs and resources necessary to fulfill that commitment. (p. 259)

Our perspective is that public schools should be fully inclusive of diversities other than disabilities and of SWD as well, *but only when such inclusion is appropriate*. In our subsequent comments, we write primarily about SWD and *habeas corpus* inclusion. Moreover, our contention is that “segregated” and variants of that word serve no purpose other than to denigrate any educational environment that is dedicated specifically to the education of SWD (Gliona et al. 2005).

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## 16.2 Inclusion of Most Diversities

Most of the diversities we see in public education in all nations of the world—e.g., racial, ethnic, cultural, sexual, and religious diversities—are relatively easily accommodated by changing only the hearts and minds of the public and school personnel. School personnel and families need to accept the specified differences without making drastic changes in instruction. Thus, little or nothing but racial inequities and prejudices prevent the full inclusion of students who differ in those ways. There is little or no need for special instruction of students depending on their skin hue, heritage, gender or sexual orientation, socio-economic status, and many other kinds of

diversity that may be part of one's identity. This is different when educating SWD.

### 16.3 Inclusion of Students with Disabilities

#### 16.3.1 Parents' Views of and Attitudes Toward Inclusion

Parents of SWD have been extremely important in establishing policy, facilities, and services, including securing the expectation of appropriate education for their children. Some leaders in special education hope that we can provide effective warning for both parents and educators about the difference between simply "being there" and making maximum educational progress.

In the USA, in the 1960s, parents' grassroots efforts resulted in legislation ensuring that children with disabilities were included in public schools. These early parental efforts focused on children simply "being there." More recent grassroots efforts by parents focus not on *where* their children are educated but on the *instruction* their children receive. Decoding Dyslexia (DD), which began with eight parents in New Jersey, is an organization of parents concerned with the lack of evidence-based interventions for children with dyslexia and other language-based learning disabilities that are routinely available in public schools. DD has grown to include chapters in all 50 states and four Canadian provinces. DD's goals include:

1. A universal definition and understanding of "dyslexia" in state education codes;
2. Mandatory teacher training on dyslexia, its warning signs, and appropriate intervention strategies;
3. Mandatory early screening tests for dyslexia;
4. Mandatory remediation programs, which can be accessed by both general and special education populations; and
5. Access to appropriate assistive technologies in the public-school setting for students with dyslexia (Decoding Dyslexia n.d.).

DD advocacy is at least partially responsible for successfully promoting legislation at the state level (Youman and Mather 2018). Legislation is in the books in all but four states—Hawaii, Idaho, South Dakota, and Vermont, and legislation is pending in South Dakota and Vermont (Dyslexic Advantage 2020).

A colleague who recognized the critical support of parents in the formulation of special education law in the U. S. (Martin 2013), now generally known as the *Individuals with Disabilities Education Act* (IDEA), spoke to the current role of parents. Martin wrote:

I wonder if we can link more productively with experienced parents, those who fought for and won Special Ed battles. It is understandable that some parents would be attracted to "inclusion" as a concept, who isn't? But the experienced parents know about sitting in a classroom without any real instruction or improvement. We can warn them about failures to assure that progress is happening. (E. W. Martin Jr., October 16, 2020, personal communication with co-author Kauffman)

The progress to which Martin refers is progress in learning not only academic skills, but also life skills. Both are important for SWD, and failure to acquire and master such skills will hamper their inclusion in activities outside the school environment. Kauffman and colleagues (Kauffman et al. 2020a, b) noted how extreme social policies have created problems in the past and warned that headlong commitment to an ideology or proposition without careful thinking and precise language can become counterproductive. The consequences of failure to think and talk precisely about the particular diversities of SWD will be disastrous for their education and their lives more generally (Kauffman and Badar 2014).

The views of parents about inclusion have long been and continue to be of prime importance in ensuring the effectiveness of education for all SWD. This is especially so because the support and involvement of parents is considered essential for facilitating optimum outcomes for SWD wherever they are educated (De Boer et al. 2010; Hornby 2011; Martin 2013). There is a long history of the views of parents about

inclusion being sought, and there is an extensive literature about this, beginning in the 1980s and continuing to the present day.

In an early study, McDonnell (1987) surveyed 253 parents of children with severe disabilities in the USA regarding their satisfaction with their children's educational placement. Of the 120 parents whose children attended special schools, 66 per cent reported that their children had previously been in integrated (i.e., inclusionary) settings. Of the 133 parents whose children attended classes integrated into mainstream schools, 73% had previously attended special schools. Results showed that there were no differences in levels of satisfaction with their children's current placement between parents of integrated and special school children. Both sets of parents reported high levels of satisfaction with the overall quality of their children's educational program.

Simpson and Myles (1989) surveyed parents of children with learning and behavioral difficulties in the USA concerning their views on mainstreaming. They found that 76% of parents were willing to support the inclusion of their children *if certain specified resources were provided*. Only 25% of the parents were willing to support mainstreaming without guarantees about these additional resources.

Lowenbraun et al. (1990) surveyed parents in the USA to determine their satisfaction with the placement of their children with disabilities in integrated classrooms of typically eight such children and 24 non-handicapped peers. They found that 88% of parents were satisfied with the placement, even though only 42% of them had initially requested it. However, they also found that parents of children who had previously been in resource room placements were slightly more satisfied with this arrangement than with their current integrated class placements.

Kidd and Hornby (1993) surveyed the parents of 29 children in the UK who got transferred from special schools for children with moderate learning difficulties into mainstream schools. Fourteen months after the transfer, they found that, overall, 65% of parents were satisfied with the transfer. However, there was a clear

difference between satisfaction rates for parents of children integrated into special classes in mainstream schools as opposed to those placed in mainstream classes. Parents of 92% of the children placed in special classes were satisfied, but this was the case for only 47% of parents of children placed in mainstream classes.

Jenkinson (1998) surveyed 193 Australian parents about the factors influencing their choice of either inclusive education or special schools for their child with disabilities. Parents preferring mainstream schools were more concerned about normalization and academic aspects, whereas those opting for special schools focused on special programs, teacher-student ratios, and children's self-esteem. The majority of parents surveyed expressed satisfaction with the current school setting attended by their child whether this was a mainstream school or a special school.

Runswick-Cole (2008) interviewed 24 parents in the UK that had been contacted through agencies supporting SWD. Some were seeking inclusive school placements, some specialist teaching within mainstream schools, and others sought special school placements. Parents who focused on individual instruction tended to prefer special schools, whereas those who focused on barriers to learning rather than within-child factors preferred mainstream school placements.

De Boer et al. (2010) reviewed the literature on parental views of inclusive education and found that the majority of parents involved in the 10 studies that were analyzed reported positive views about inclusion, but also reported various concerns, including the availability of services and individualized instruction.

Paseka and Schwab (2020) reported data from 2000 parents involved in a nationwide survey in Germany, which indicated that parents' views about inclusive education depended on the specific type of disability of their child. Parents of children with physical disabilities or learning disabilities were more positive about inclusion than parents of children with behavioral disorders or cognitive disabilities.

In conclusion, the findings of research on parents' views of special and inclusive placements suggest that they are neither

overwhelmingly for nor against the practice of inclusion but consider that for some SWD, and at some times, they prefer separate special education placements and at others, they prefer more inclusive placements. Thus, a uniform requirement of placing all SWD in general education settings is certain to override the preferences of some parents and deny them the right to choose the most appropriate setting for their children. This would be the most unfortunate outcome, which might be anticipated if readers of the United Nations CRPD, article 24 interpret “full inclusion” to mean inclusion in the sense of *habeas corpus* (Anastasiou et al. 2018). More appropriate, in our opinion, is the maintenance of a range of placements (in U. S. law called a continuum of alternative placements or CAP) from which parents may choose, depending on the nature of the child’s disabilities and the child’s age and circumstances.

### 16.3.2 Teachers’ Attitudes Toward Inclusion

A key element in the discussion of inclusion is teachers’ views, the professionals who have the major responsibility for implementing it. Teachers’ attitudes may be a factor in the success of inclusive practices and can affect their commitment to implementing them. Thus, numerous studies of teachers’ views have been conducted for decades (e.g., Cook and Cook 2020; Hornby 1999). We focus here on the most influential systematic reviews and some recent studies on this topic.

Scruggs and Mastropieri (1996) reviewed 28 survey reports from 1958 to 1995, relating to general education teacher perceptions of inclusion. About two-thirds of the teachers (65%) supported the general concept of inclusion, but they indicated different levels of support for including students with different disability conditions. A smaller percentage (53%) of general education teachers was willing to teach SWD in their own classrooms. About half of the general education teachers and about two-thirds of special education teachers considered that inclusion

could benefit students with and/or without disabilities. However, only 33 percent of teachers in 10 reviewed surveys agreed that the general education classroom was the best place for SWD or that full-time inclusion would produce social or academic benefits relative to resource room or special class placement (Scruggs and Mastropieri 1996, p. 65). A minority (28%) of teachers agreed that they had sufficient time for inclusion, and roughly one third (29%) considered that general education teachers had sufficient expertise or training for inclusion.

Avramidis and Norwich (2002) conducted a review of the literature (1984–2000) which showed that teachers are positive about integration/inclusion. However, no evidence of acceptance of “total inclusion” or a “zero reject” approach to special educational provision was found (p. 129). Teachers’ attitudes were more influenced by the nature of the disabling condition and environment-related variables (e.g., social and physical support) rather than teacher-related characteristics. Teachers held more positive attitudes toward the inclusion of students with mild disabilities, physical disabilities, and sensory impairments than students with more complex needs. Specifically, they held more negative attitudes toward the inclusion of students with severe learning needs and behavioral disabilities. Teacher-related variables were inconsistent and not found to be a strong predictor of educators’ attitudes (Avramidis and Norwich 2002).

About a decade later, De Boer et al. (2011) reviewed 26 international studies (including 10 studies from the USA) published between 1998 and 2008 relating to primary school teachers’ attitudes toward inclusive education. They found that most teachers held neutral or negative attitudes toward the inclusion of SWD in regular primary schools. No studies reported clear positive attitudes of teachers. Teachers with less teaching experience held more positive attitudes toward the inclusion of SWD than those with more years of teaching experience. Teachers who had previous experience with inclusive education held more positive attitudes than teachers who had no or less experience with inclusive

education. Finally, teachers held more positive attitudes toward the inclusion of students with physical or sensory impairments but more negative attitudes toward students with intellectual disabilities, attention deficit-hyperactivity disorder (ADHD), and moderate or severe emotional and behavioral disorders (EBD) (De Boer et al. 2011).

In a recent meta-analysis, van Steen and Wilson (2020) reviewed 50 international studies published between 1994 and 2019 that included 64 effect sizes. Of the effect sizes, only five came from U.S. studies. They found that effect sizes for in-service and pre-service teachers were medium-sized, with teachers holding overall positive attitudes toward the inclusion of SWD,  $d = +0.51$ , 95% CI [0.31, 0.71]. When considering other moderators, student (pre-service) teachers showed more positive attitudes toward inclusion than primary school teachers. Higher levels of individualism, a cultural variable, was related to more positive attitudes toward inclusion. Demographic variables (pre-service or primary school teachers, teacher gender) did not significantly affect teachers' attitudes toward inclusion. However, one of the limitations of this meta-analysis was the relatively high level of missing data in moderator coding (van Steen and Wilson 2020, p. 11).

In a review of highly cited research studies on inclusion, Cook and Cook (2020) included five surveys of teachers and one survey of principals toward inclusion. Teachers' attitudes were generally favorable toward the inclusion of students with physical disabilities, speech, and language impairments. However, teachers and principals were relatively unsupportive of including students with EBD. In general, teachers held more negative attitudes toward students with hidden or not immediately observable disabilities than more obvious disabilities (Cook and Cook 2020). Less experienced teachers were more optimistic about inclusion, whereas more experienced teachers were less optimistic. Two surveys in this review had found that teachers' positive attitudes toward inclusion correlated positively with high self-efficacy (Cook and Cook 2020).

A positive relationship between self-efficacy beliefs and attitudes toward inclusion was found in recent studies in Germany (Ahrbeck and Giese 2020) and Finland (Saloviita 2020b). However, in another Finnish study ( $N = 4567$ ) by Saloviita (2020a)—including classroom teachers, teachers of particular subjects (e.g., math, science), resource room, and special education class teachers—there was very low support for the concept of inclusion. Teachers worried that inclusive placements would cause extra work for them. Positive attitudes toward inclusion were associated with confidence in the existence of support networks and sufficient access to educational resources, such as an in-classroom teaching assistant (Saloviita's 2020a). Saloviita (2020a, b) argued that a vicious cycle exists between resources and teacher attitudes. An adverse climate toward inclusion prevents legislation guaranteeing adequate resources for mainstream teachers in inclusive classrooms, and, in turn, the lack of legal guarantees maintains negative teacher attitudes toward inclusive education (Saloviita 2020a). A survey in Germany found that although 54% of teachers supported inclusive education, 42% of teachers thought that even with adequate resources, SWD should be taught in special education settings (FORSA 2017). Teachers who had experience with inclusion were more favorable toward inclusion. However, even in this group, 38% of teachers with direct inclusion experience rejected it (FORSA 2017). FORSA has been conducting regular surveys in Germany for the *Verband Bildung und Erziehung* (VBE), a teacher's union since 2015. The most recent survey from 2020 came to the conclusion that conditions in schools are still very poor when it comes to inclusion, even after more than 11.5 years of the ratification of the CRPD. Conditions that support inclusive education, such as team-teaching of regular and special educators, smaller classrooms, multi-professional teams, accessible school buildings, and professional development for teachers in the area of special and inclusive education continue to be poorly implemented. This led to the result that in the latest 2020 survey, 83% of the 2127

general education teachers surveyed support the continuation of special schools (VBE 2020). Savoliita (2020a) found that special education teachers had a more positive attitude toward inclusive education than general classroom teachers and teachers of a particular subject (Saloviita 2020b). Attitudinal barriers in Finland seem particularly high in teachers who teach secondary school, possibly because the focus is more on subject matter than student development (Saloviita 2020a). This is consistent with the fact that in some countries (e.g., Germany), inclusion at the pre-school and elementary school level is practiced more often than in middle or high school (Mensch 2020). Thus, attitudes toward the most appropriate setting for education depend a great deal on the student's age and stage of development.

Recently, Heyder et al.'s (2020) study involving 757 teachers found that teachers' positive attitudes toward inclusion were correlated with more social inclusion of SWD. However, teachers' skills and knowledge about educating SWD in an inclusive classroom may moderate the effects of attitudes. Thus, besides attitudes, teachers' knowledge and skills seem to play an important role in inclusive education (Heyder et al. 2020). Knowledge and skills may make teachers more confident and increase their self-efficacy in teaching SWD.

Overall findings from the numerous studies reviewed indicate that teachers have a more nuanced view of inclusion than that envisioned under a *full inclusion* policy. Empirical research highlights the necessity of special education expertise as well as the need for general teacher training in teaching SWD in inclusive classrooms. Of critical importance for a positive change in attitudes toward inclusion is the administrative support and the availability of resources. Without a reliable and legally binding support system, it appears that attitudes toward inclusion tend to be negative. For example, Heyder et al. (2020) found that SWD felt less socially integrated than their classmates without special educational needs and emphasized that *physical inclusion* does not automatically mean *social integration* (Heyder et al. 2020).

### 16.3.3 Issues for All Educators

Disabilities present distinct problems for teachers because they are often (but not always) related to learning and often (but not always) demand instruction that is different from that of most other students. In providing appropriate education for SWD, discrimination or prejudice may be involved as well as a need for special instruction. However, in a full-inclusion model, such discrimination may involve failure in delivering appropriate instruction in environments other than the general education classroom as well as denying access to teaching in the general education classroom for SWD who can thrive there. Therefore, failure to see how disability differs from other diversities in its demands for varied treatment can have tragic consequences for SWD in schools (Wiley et al. 2019).

We understand that disability per se does not demand special education, that only the special educational needs of SWD require special education. We also know that students who do not have disabilities sometimes have exceptional educational needs, and we do not object to the assumption that general education teachers meet these educational needs. However, the assumption that general education teachers should be expected to meet all of the special educational needs of all SWD all of the time has no solid empirical evidence.

One special problem of placing all SWD in general education classes is making the judgment that no public-school student is most appropriately taught somewhere other than the general education classroom. Undergirding the idea that such a placement should not be allowed because such students do not exist has become increasingly popular. Part of the idea of full inclusion, explicit or implicit in recent school reform proposals, is that instructional failures are not usually because of the extent of children's needs, but instead are ordinarily caused by teachers' unwillingness or inability to meet these instructional needs. This leads to the judgment that a student's needs cannot be met in a particular environment or placement should never be



accepted because it is always possible for a teacher to find a way to teach that child regardless of where he or she is placed.

In our estimation, such conjecture—the proposition that the general education classroom can be made appropriate for all students—is ill-advised in planning the education of SWD. That is, claims of the advisability of full inclusion for all SWD in general education and claims of the past or potential future appropriate education of all SWD in general education—and the frequent mantra “all means all”—are best met with incredulity. Suppose that all SWD—all of them, each and every one of them—can best be taught in general education along with their age peers suggests unbending ideological commitment to inclusion at the cost of high-quality education (Anastasiou et al. 2018).

We see worldwide optimism about inclusion in general public education of SWD. Much enthusiasm seems to have been created by documents from the United Nations (see Anastasiou et al. 2018, 2020) and leaders in the study of disabilities (see Kauffman and Hornby 2020). Enthusiasm is also derived from the idea that differences called disabilities, like those defining color, gender, heritage or culture, and so on, are socially constructed and/or should be treated as similarly inconsequential for the place in which any student is taught. Just why this is the case is not always clear, but a highly esteemed colleague (who shall remain anonymous) emailed observations about contributing factors involving the aims of people in the education community, their attitudes toward scientific evidence to support their suggestions, and their concern for the lives of the students involved:

Over the years I developed a sense that there are people in the education community (in all areas, and at all levels) who are guided by nothing more than self-interest and dogma. I used to think they had an ideology, but it became clear to me that some elements within the inclusion “movement” have neither the appetite for, interest in, nor capacity for constructive argument; they seek only to push their threadbare, evidence-lite drivel down everyone else’s throats, and without a single thought for the young people’s lives that are blighted by their poorly formulated ideas.

### 16.3.4 Students with Severe Disabilities

Many students with severe disabilities need instruction in life skills that those with less severe disabilities (or none) do not. Such SWD may not be included in general education for reasons related to their individual education programs (IEPs in U. S. law) (Bateman 2017; Kauffman et al. 2019). The pretense that students who need instruction in basic self-care skills will receive appropriate instruction in the context of a general education classroom is not tenable (Kauffman et al. 2020d).

We note that the severity of disability is multifaceted. That is, any disability in and of itself can be severe. However, single disabilities are relatively rare. In most cases, students have multiple disabilities, and severity can be a function of the multiplicity of disabilities. In many cases, multiple disabilities create uniquely challenging difficulties for teachers.

### 16.3.5 SWD Whose Disabilities Are Sensory

Also questionable is the claim that the general education setting is always the best environment for deaf students learning to communicate with others or blind students learning orientation and mobility skills. In fact, the National Association of the Deaf has adhered to a long-standing position statement supporting a full continuum of alternative placements and denouncing full inclusion: “Placement of all deaf and hard of hearing children in regular education classrooms, in accordance with an inclusion doctrine rooted in ideology, is a blatant violation of the IDEA with serious consequences for many deaf and hard of hearing children” (National Association for the Deaf 2002). Zebehazy and Lawson (2017) point out the necessity of understanding the unique educational needs of students who are blind or have low vision, which cannot always be met in general education.

### 16.3.6 SWD Whose Disabilities Are not Severe

Appropriate instruction of SWD whose disabilities are less severe and the challenge of meeting these students' special educational needs is another matter. For these students, special—i.e., different—education is required. Sometimes, such different, special education is possible in the context of general education, but suggesting that nothing different is required is not consistent with what special education means. Zigmond and Kloo (2017) argued that special and general education must be different and that this is a matter of logic as well as U. S. law.

Parents, legislators, and teachers themselves complain that general education teachers are not equipped to meet the educational needs of students with disabilities. The disgrace is not that general education teachers are not adequately prepared to deliver a special education to the students with disabilities in their large and diverse classrooms. The disgrace is that we have come to believe that special education is so not-special that it can be delivered by a generalist, busy teaching 25 other students a curriculum that was generated by the school board, or state, or federal level. (p. 259)

The nature of special education and how it differs from general education have been delineated by others as well (e.g., Kauffman et al. 2018; Pullen and Hallahan 2015). Pullen and Hallahan (2015) concluded that special education in the context of general education is not always feasible because it is clear that special education is both qualitatively and quantitatively different from general education. First and foremost, they note, special education instruction is individualized and leads to mastery of specified skills, which is not always possible in the general education setting. Therefore, instruction and environment cannot be considered entirely separate qualifiers of special education.

Teaching is far more complicated than many people think, and teaching groups that are more diverse in what students know and need to learn are more difficult to teach, especially if all the students are to be taught well. Furthermore, the idea that good special education is simply good teaching, that one need not specialize in teaching

specific subject matter or type of student, reflects gross ignorance of the task. Certainly, there are core competencies required for any skilled craft or profession, but in all areas of highly skilled work, specialization is necessary. Kauffman et al. (2020c) denounced the notion that teaching requires no specialization with comparisons of teaching to driving, flying, building, practicing medicine or dentistry or law, and so on.

Yet, in 2014, the Iowa Professional Teaching Practices Commission proposed a single special education endorsement for all levels of instruction (K-12) and all levels of severity for all types of disability. This unfounded assumption of the adequacy of some sort of generic teaching skills led Kauffman et al. (2020c) to conclude:

Teachers who take their task seriously understand the ignorance of someone who asks, “Who knew teaching could be so complicated?” Experienced, competent teachers also understand how adding to the learning diversity of a group of students (not the group’s racial, ethnic, gender, or other diversities that do not determine learning) adds to the difficulty of effective instruction. As with virtually any task, some will claim that whatever activity (teaching, building, playing a musical instrument or sport, etc.) is easy—claim to have a simple solution to the challenge of its mastery. For more than 45 years, some special education leaders have supported the fiction that general educators should be able, at least with help from special educators at their elbows, to teach all children without exception, including those with disabilities (e.g., Reynolds 1974).

In education, differentiation is often presented as an easy, or at least eminently doable, solution to teaching diverse groups. Inclusion of the most difficult students in general education is sometimes presented as something all teachers worth their salt can accomplish with a little extra effort, a little help, and/or reasonable determination. Aspersion are then cast on good general education teachers who say they can’t do it or can’t do it well. We hope that one legacy of the inclusion movement in education will be better understanding of the complexities and demandingness of teaching. (Kauffman et al. 2020c, pp. 261-262)

Beyond the rational consideration of the task of teaching is coherent thinking about the nature of substantive social justice. The words “social justice” are often used, and rightly so, in defense of individuals who have been discriminated against for reasons unrelated to their disability

(e.g., skin hue, heritage, or religion). That is, people are treated differently (unequally) when there is no good reason to do so. But, what of cases in which there *is* good reason to do so? Then, identical treatment (or failure to provide appropriate treatment) is unfair and discriminatory. Anastasiou et al. (2018) included an analysis of how this is ignored in article 24 (on education) of the United Nations Convention on the Rights of Persons with Disabilities (the CRPD), which calls for full inclusion but does not define it.

The common denominator, under article 24, is over-emphasis of the principle of equality of treatment and under-emphasis of the principle of differential treatment based on special educational needs. ... High quality education for all requires that we not disregard the atypical needs of any human being. To paraphrase Aristotle, there is nothing more unequal than the same and invariant educational treatment of people with unequal learning capabilities. [see also Greenhouse 2020] Beyond equality of opportunity as antidiscrimination and/or inclusion as physical presence in general classrooms, we need a pluralistic and contextualized approach to social justice operationalized by a needs-based analysis. For this reason, we need to add two other important principles, relevance and proportion, to achieve social justice. Relevance to learning and behavioural special needs demands that people be treated more or less the same, unless there are relevant educational reasons for treating them differently. ... A society dedicated to fulfill the needs of all PWD [persons with disabilities] does not depart from ideals of equality if, at some stage in their educational course, students follow different curricula in different settings. Quite the contrary, it extends equality in the direction of fairness and justice, and in our view this is the best way of maximizing learning. (pp. 688-689)

Greenhouse (2020) describes how imprecision of language, and therefore, distorted thinking about justice, is terrifying, not just depressing. Precision of language is sorely lacking in special education (Kauffman and Badar 2014). We who advocate for special education as *proprium instructio*, not *habeas corpus* (e.g., Hornby 2014; Kauffman and Badar, 2020, Warnock 2005), find the prospect of losing special education because of such imprecision both terrifying and depressing (Kauffman et al. *in press*). An example of

imprecise language in speaking of the inclusion of SWD—perhaps, as Orwell (1954) suggested, a reflection of sloppy thinking—is the refrain “all means all.” If that phrase is taken literally to mean that all means each and everyone, then how many cases are needed to refute it? Precisely one, of course. If it is not taken literally, then “all” means only those for whom inclusion is found appropriate. And that is precisely why special education law in the USA addresses individuals, not groups with disabilities, requires individual education programs (IEPs) for SWD, and requires that appropriate placement be selected from a full continuum of alternative placements (not a continuum of services, but a continuum of placements).

The gross imprecision of our language about disabilities was described in an essay by Kauffman (1999), who called for the kind of hope without denial exhibited by Hungerford (1950). Kauffman quoted Bible scripture to illustrate a point about inclusion: “... what man is there of you whom if his son ask bread, will he give him a stone? Or if he ask a fish, will he give him a serpent?” (Matthew 7:9–10, KJV). He went on to say:

But there are those who confuse these things, who would not discriminate serpent from fish, who suggest that we let others eat stones and pretend they are eating bread. In this confused state, some would as soon celebrate the gift of disability as give the gift of teaching, would fail to see the difference between the stone of “being there” and the bread of learning critical skills, or would accept social deviance in place of prosocial behavior. When it guides practice, this confusion is a moral catastrophe.... (Kauffman 1999, p. xi)

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## 16.4 Summary and Conclusion

We discuss problems in achieving inclusive and quality education for SWD as envisioned by UN’s SDG 4, acknowledging that tensions depend on what is meant by *inclusive* education. This tension is also evident in the CRPD (Anastasiou et al. 2018). Inclusive education may mean participation in the worldwide quest for the

right to education of SWD in the same place as all other students *or* to appropriate instruction, even if that means teaching SWD and students without disabilities in different places (environments or settings). Teachers' and parents' perspectives consistently, throughout long-past and recent decades, support a view of inclusive education that puts appropriate education ahead of the place of education. Common learning experiences of SWD and students without disabilities are generally viewed as positive, but not necessarily at all times and also not for all students, depending on their abilities and needs, the abilities of their teachers, and on the resources provided by states and governments. Quality education can only be reached if an individual child's potential can be accessed. It appears that accessing this potential may occur in the general education setting for many—but not *all* SWD. Voices of teachers and parents need to be heard in the quest for inclusive education, as they and their children are the ones who must live with the consequences for the rest of their lives.

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