

INCLUSION

What Does it Even Mean?

Did you know the word "inclusion" does not actually appear in the laws that seek to ensure it for children with disabilities? It's true. You may however, recognize the phrase "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" (34 C.F.R. §300.114(a)).

A Google search for the word 'inclusion' results in over 63 million hits. The foundation of the inclusion movement originated in a New Jersey Federal Appeals case known as *Oberti vs. Board of Education*.^{*} Congress later used the *Oberti* case to enhance special education law with IDEA, establishing that inclusion in education "is a right of all, not just a few." In other words, parents no longer "had to prove that their child was worthy of being included." The *Oberti* case instructs schools to "move beyond those systems, structures and practices which tend to result in unnecessary segregation of children with disabilities."

Discussing inclusion can be confusing, as there are many phrases used to refer to

educating students who receive special education services in the general

education classroom. Here is a list of some terms you may have heard:

Inclusion implies membership rather than guest status in a classroom, as well as active participation rather than proximity to activities; it also implies

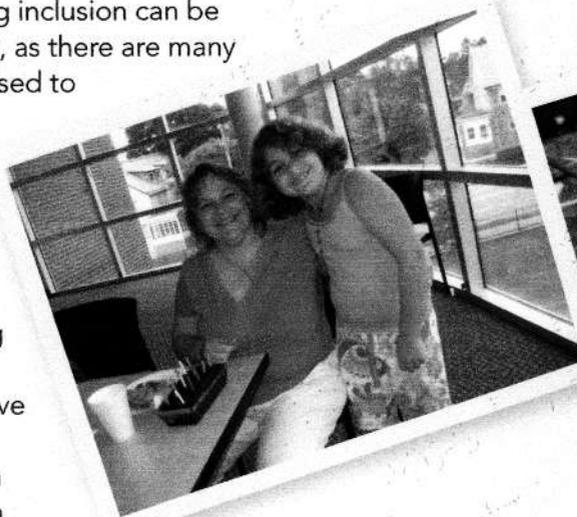


access to the general education curriculum. The Pennsylvania Department of Education (PDE) states that "the term inclusion implies more than physical proximity to non-disabled peers; it encompasses full participation and equality within a group, leading to a sense of belonging within the community at large."^{**}

Integration is a term used to refer to the opposite of segregation. It implies physical proximity of students with disabilities to their typical peers, but not necessarily social belonging or academic rigor. This word was used in special education decisions as early as 1983 to discuss inclusion disputes.

Mainstreaming is another phrase used to describe an earlier concept of inclusion, but the term is somewhat outdated and does not refer to the best inclusive practices. Historically, this phrase refers to the placement of a child with a disability in a general education academic class (such as social studies) as long as she could keep up with existing instructional demands and disruptive. In other

was not words, a



'mainstreamed' student had to prove

daily that he deserved to be in the general education classroom with no supportive services to compensate for any skill deficits. The *Oberti* court also used this term to describe what is now considered "inclusion."

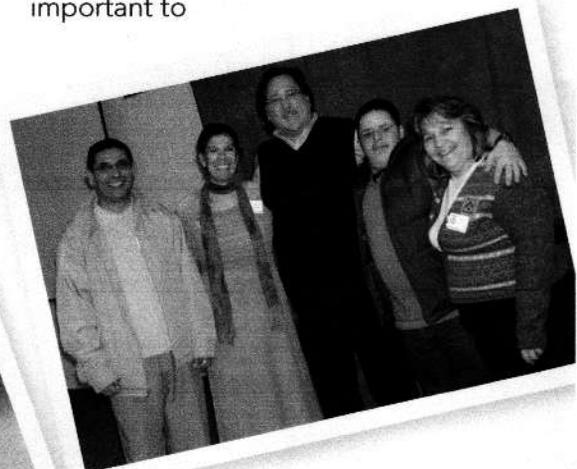
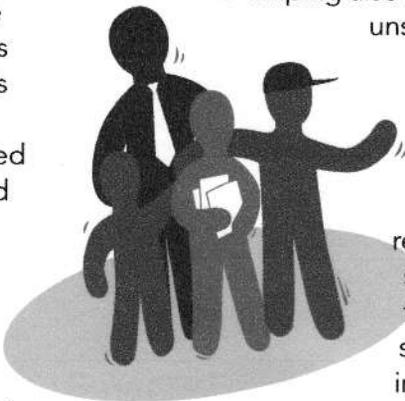
True inclusion, as defined above, assumes that the child will benefit from being a part of the general

education classroom with the appropriate supports and services. One of the most important benefits of this inclusion is non-academic: the opportunity to socially learn from valuable language and social skills from "typical" peers. Inclusion also works best when services are portable, meaning that speech therapy and other services can happen in various places outside the resource room. More recently, Pennsylvania has required that students with disabilities have a "highly qualified teacher" in core subjects, access to research-based curriculums, and benefit from planned progress monitoring services. These requirements were enacted to reach compliance with the No Child Left Behind Act (NCLB).

In a full inclusion model, all services are brought to the child in the general education classroom. The child is not pulled out of his classroom for any part of the day; rather, services "push in." Full inclusion does not require the general education teacher to devote all of her time to one child, single-handedly provide every supplementary aid the child requires, or modify the existing curriculum into oblivion. Full inclusion is meant to be achieved by a team of general

education teachers, special education teachers, parents, and other providers working together.

Unfortunately, there is also a term for so-called "inclusion:" **dumping**. "Dumping" occurs when a child is placed in a general education setting without needed supplemental aids and services. Dumping also happens when classroom teachers are unsupported and do not have adequate resources. The Pennsylvania Department of Education specifically warns that dumping is not true inclusion: "Inclusion is not a dumping of students in a regular class without special supportive services. Special services, referred to in law as 'supplementary aids and services,' are at least as important to



students with disabilities in regular classes, if not more important, than such services are to students with disabilities in segregated settings" (PDE Basic Education Circular, 1997).

There are many words used by parents, advocates, and educators to describe inclusion, some with historical significance and others used incorrectly. We welcome your thoughts on what inclusion means to you and your family and/or students in your classroom. Please drop us a note, we would love to include your perspective in our next newsletter!



* *Oberti vs. Board of Education of the Borough of Clementon School District* (3rd Circuit Court, 1993, 995 F.2d 1204 (3rd Cir. 1993)) Editors Note: This 1993 federal case was litigated in part by Attorney Judith Gran, a current member of PEAC's Advisory Council.

** *Least Restrictive Environment (LRE) and Educational Placement for Students with Individualized Education Programs (IEPs), Basic Education Circular (BEC), Pennsylvania Department of Education, Issued 1977, Revised 2002, Reviewed 2009.*