

Building International Capacity for an Inclusive Special Education:  
Views from Germany, Tanzania and the United States

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### Abstract

Internationally, the United Nations Convention on the Rights of Persons with Disabilities (CRPD) is playing a pivotal role in shaping school reform initiatives for students with disabilities and inclusive school reform. This paper explores the impact and views of the CRPD across three countries—Germany, Tanzania, and the United States—each representing different educational systems and frameworks. Varied approaches to inclusionary school reforms and special education are reviewed within these nations, highlighting the unique issues and challenges encountered. The paper delves into the critical issues surrounding inclusive reform, emphasizing the debate over full inclusion and its implications for inclusive special education practices. By examining these diverse settings, the paper underscores the complexities of implementing inclusive special education policies that effectively accommodate students with disabilities while considering national contexts.

## Introduction

Internationally, the United Nations Convention on the Rights of Persons with Disabilities (CRPD) is influencing school reform for students with disabilities worldwide (United Nations, 2006). Adopted on December 13, 2006, and entering into force on May 3, 2008, the CRPD is a landmark effort to foster a fully inclusive, accessible, and non-discriminatory world for people with disabilities (United Nations, 2006). The influence of the CRPD in disability policy is evident both in countries that have ratified the agreement, such as Germany and Tanzania, and indirectly for those that have not, such as the United States. The laudatory aims of the CRPD are to promote, protect, and ensure the equality of human rights and fundamental freedoms for all persons with disabilities.

The CRPD has become the driver for full inclusion movements internationally and impacting reform discussions of disability law and special education policy and practice. These full inclusion movements are aimed at restructuring education systems in many countries to align with the human and disability rights policy goals of the CRPD. Often however, these reforms with the goal of full inclusion in mind, have led to the dismantlement of special education and supports for children with disabilities, leaving families and students in difficult positions (Anastasiou et al., 2020; Felder et al., in print; Hornby et al., in print).

Regarding equity and social justice aims of inclusion for students with disabilities, the divide is not on inclusion as a disability right or a socially important goal, or that there is not value in fostering social interaction, belonging, and friendships that might be built upon in inclusionary settings. Building the capacity of schools to support students with disabilities within regular education settings is essential. However, the debate primarily revolves around whether there should be a continuum of services that includes both inclusive and special education. This

concept is opposed to anti-realist and ideological mandates for full inclusion that require all students with disabilities to be in regular education settings full-time, without exception (Hornby & Kauffman, 2023). As Zigmond and Baker (1996) noted, "Inclusion is good; full inclusion may be too much of a good thing" (p. 33).

In the international debate regarding disability and special education reform, it is important to separate out two issues regarding school inclusion reform. First, in many countries, restructuring special and regular education to meet inclusive goals is necessary and essential in relation to disability rights. However, there is a balance between a right to inclusion and a right to an effective and appropriate special and inclusive education (Hornby, 2015). Some prevailing views on disability and inclusion advocate for disability anti-realism, call for the dismantlement of special education, and/or focus on a full inclusion mandate (Slee, 2018, Connor, 2020; Taylor, & Sailor, 2023) are rigid and ideologically based, and are neither tenable nor reasonable (Hornby & Kauffman, 2023). Some of these perspectives refer to disability as a socially constructed myth (Slee, 2018), critique science as a form of oppression (Connor, 2020), or call for the cessation of special education (Taylor, & Sailor, 2023). These views are not grounded in a realistic and objective understanding of the nature of disability, specialized instruction, and supports (Hornby & Kauffman, 2023). These misguided views should be contested worldwide, and separated from a valid focus on inclusion and special education that is grounded in objective realities and evidence-based approaches.

In response, some are calling for a more measured and balanced approach to meeting the CRPD provisions on inclusion (e.g., Kauffman, Felder, Ahrbeck, Badar, & Schneiders, 2018). The "Golden Mean" is a concept that originates from ancient Greek philosophy (Aristotle, 2004). It refers to the desirable middle ground between two extremes, one of excess and the other of

deficiency. Aristotle used this concept as a moral guideline, proposing that virtue is a balance between two vices — one involving excess and the other scarcity. For example, courage is considered a virtue that lies between the extremes of recklessness (excess) and cowardice (deficiency). The idea is that by finding the golden mean, one can achieve a balanced and ethical life, avoiding the pitfalls of going too far in any one direction. Moreover, The Golden Mean is not fixed but varies from person to person, recognizing the individual differences in people's circumstances and capabilities. Therefore, what constitutes a mean for one individual might be an excess or deficiency for another. Integrating the concept of the Golden Mean with the debate on disability and special education reform, we can see a need for a balanced approach that avoids extremes.

In many countries, restructuring both special and regular education to meet inclusive goals is seen as essential in relation to upholding disability rights. However, Aristotle's concept of the Golden Mean suggests that virtue and practical wisdom lie in finding a strategic balance. As indicated by Hornby (2015) "There is a balance between a right to inclusion and a right to an effective and appropriate special and inclusive education" (p. 28). This strategic balance is critical between the right to inclusion and the right to receive an effective and tailored education that meets special needs. While some prevailing views, such as those promoting disability anti-realism or the dismantlement of special education, advocate for radical inclusivity without exceptions, they often lack a nuanced understanding of the diverse learning needs within the disability community. For instance, some perspectives treat disability as a mere social construct and criticize traditional scientific approaches as oppressive or demand the complete cessation of specialized educational frameworks. These positions, while ideologically motivated, do not

always consider the practical and varied needs of individuals with disabilities who may require specific supports that generalized full inclusion cannot provide.

By applying the principle of the Golden Mean, we can argue for a moderate path that incorporates the strengths of both inclusionary and specialized educational systems. This balanced approach would recognize the value of inclusion in fostering social integration and equality, while also maintaining specialized resources and settings for those whose needs are best met in more tailored environments. Such a balanced approach is not only practical but also essential to ensuring that all students receive an inclusive and special education that truly accommodates their individual circumstances and maximizes their potential, thereby embodying the virtues of equity and justice in school inclusion reform.

### **Inclusive Special Education**

Disability inclusion as an important socially valid goal but an inclusion realist approach is needed the conceptualization of the nature of disability and impairment, inclusive special education implementation, and school inclusionary reform (Felder & Burke, 2024, Kauffman et al., 2023). In this paper, Inclusive Special Education (as described by Hornby 2014, 2015) is used as an alternative reframing to describe a valid framework representing a middle path for achieving inclusive school reform while preserving alternative settings within the context of a continuum of services and placements that meet the full range of needs of all learners with disabilities. Hornby (2015) Inclusive Special Education "as educating children with special educational needs and disabilities (SEND) in the most inclusive settings in which their special educational needs can be met effectively, using the most effective instructional strategies, with the overarching goal of facilitating the highest level of inclusion in society post-school for all young people with SEND" (p. 236).

Inclusive special education (Hornby, 2015) offers a disability framework for organizing evidence-based interventions and inclusionary reforms while maintaining the core elements of special education. In this framework, it is feasible to align regular, inclusive, and special education. There are significant, socially valid objectives connected to prevention science and the application of special education practices that aid students with disabilities in inclusive settings. However, as noted by Anastasiou, Burke, Wiley, and Kauffman (2024), special education and specialized instruction must maintain distinct roles in research, policy, and practice, specifically tailored to students with disabilities. Inclusive special education promotes the integration of the strengths of both inclusionary and special education practices, safeguarding evidence-based methods, and alternative settings for those students whose complex needs require specialized support in a separate setting—support that regular educational environments may not be able to provide.

Inclusive special education (Hornby, 2015) offers a balanced approach for integrating inclusionary and special education practices within existing frameworks to meet the diverse learning needs of students with disabilities. It fosters capacity building and facilitates the integration of students with special needs into inclusive educational settings, thereby enhancing accessibility and participation for all based on the unique needs of the student with disabilities. Simultaneously, it upholds the necessity for specialized environments and supports for students with needs that exceed what a regular classroom or school can provide. Inclusive special education provides a versatile educational framework that adapts to a wide range of disability needs, ensuring every student receives an education that is both inclusive and adequately supportive.

The CRPD is influencing international educational reforms, setting the stage for analysis of an inclusive special education across three distinct national contexts. Moreover, this paper explores the practical considerations of implementing an inclusive and special education in Germany, Tanzania, and the United States. The authors will first review selected aspects of inclusionary school reform related to inclusive special education underway. The three countries have differing economies and different views on the education, disability, and governmental institutions, public welfare systems, and educational and special education structures. Of the three countries, the United States and Germany belong to the economically most wealthy countries in the world, whereas Tanzania is considered a developing country with many of the population living in poverty (World Bank, 2024). Second, they will provide their view of issues associated with inclusive special education reform along with background, opportunities, and challenges. Third, the authors articulate how a middle road might be taken in the inclusive education movement (Hornby 2014, 2015).

### **Inclusive School Reform in Germany**

The impact of the CRPD on German educational policies highlights both the advancements and challenges in striving towards more inclusive educational settings. It is significantly impacting policy discussions on school reform efforts in Germany (Ahrbeck, 2021; Ahrbeck, Fickler-Stang, Lehmann, & Weiland, 2021). In October 2023, the CRPD Committee published its evaluation report that included Germany's implementation of the Convention on the Rights of Persons with Disabilities (CRPD Committee, 2023, Iii). The committee favorably viewed the passage of the German Federal Participation Act (Bundesteilhabegesetz, BTHG) of 2016. The Act was seen as a substantial advancement for Germany in promoting disability rights, enhancing the self-determination of people with disabilities, and fostering their inclusion by



aligning national policies with the CRPD's international standards. Moreover, the committee highlighted that the Act supports the inclusion of individuals with disabilities in mainstream educational settings, thereby bolstering their right to education alongside non-disabled peers. However, other concerns were expressed regarding progress toward full inclusion under Article 24, which emphasizes the right to inclusive education, ensuring that persons with disabilities are not excluded from the general education system and receive necessary support to facilitate their effective education (CRPD Committee, 2023, III.B, Art. 24).

### **Special and Inclusive Education in Germany**

The current state of special education in Germany reveals the tensions in inclusive school reform, especially between special schools and the movement towards greater disability inclusivity within the general education system. Special Education in Germany is referred to as Sonderpädagogik. This term roughly translates to "special pedagogy" "special education" or "special instruction" and refers to the area of education in Germany on teaching students with special needs. Policy reforms to promote inclusive education and reform are occurring in many places in Germany, but the wide-scale reform efforts remain elusive. Organizationally, The Federal Republic of Germany is a sovereign nation-state within the European Union. Within Germany, there are 16 federated states, known as "Bundesländer," each with its own tradition, culture, history, constitution, and governmental structures. Moreover, each state has the autonomy and freedom to design its educational system within the common framework provided by the German constitution.

In the German educational system, most students with disabilities are provided education at disability-specific special schools. Not surprisingly, the CRPD Committee expressed concerns regarding the progress toward implementing inclusive education. In particular, the CRPD

Committee stated concerns regarding “the lack of full implementation of inclusive education throughout the education system, the prevalence of special schools and classes, and the various barriers encountered by children with disabilities and their families in enrolling in and completing studies at mainstream schools” (CRPD- Committee, 2023, III., Art. 24, 53).

Currently, there are 530,000 students with special needs, comprising 7.7% of all students. Forty-four percent of all students with special needs are educated in regular education classrooms, with variations ranging from 31% to 90% between the German states (Autor:innengruppe Bildungsberichterstattung, 2022, p. 171). This variation clearly shows that there is no consensus in the German states to what extent students with special needs should be included in the regular education classroom. Even though the number of students with special needs in inclusive classrooms has increased in recent years, the number of special needs schools has not significantly decreased. The inclusion rate is measured by how many children with special needs attend either special or regular education schools. However, there is no data on how often students attend regular classroom environments or are absent from them in regular schools. Moreover, special education schools with various special needs categories also exist in each of the sixteen German states. Most children who attend special schools do not earn a regular school diploma, except for the special education diploma, which leaves them vulnerable for regular employment following graduation. However, Germany has a highly developed special education system, with specially trained teachers and other professionals. Moreover, there has been much discussion about the interpretation of the CRPD when it comes to implementation of inclusionary reform (Ahrbeck, Felder, & Schneiders, 2018).

### **Inclusion Realism**

'Inclusion realism' (Felder & Burke, 2024) is needed in integrating the best aspects of both special and inclusive education to meet the diverse needs of students with disabilities without compromising on quality and effectiveness. Instead of dismantling the existing special education system to achieve complete inclusion, this pragmatic approach is advocated (Felder & Burke, 2024; Kauffman et al., 2018; Kauffman, 2022). This concept of inclusion realism emphasizes a strategic, empirical, and socially valid integration of special and inclusive education practices (Hornby, 2014, 2015). Such an approach acknowledges the commendable objectives of inclusion while also remaining pragmatic, objective, and evidence-based in its implementation. To facilitate the necessary capacity building for inclusive special education, it is recommended to adopt this framework when conceptualizing educational reforms.

Unfortunately, many are interpreting article 24 of the CRPD as a full inclusion mandate. However, Hornby and Kauffman (2023) point out that, to date, there is no fully inclusive school system worldwide where all children are educated in the regular education classroom regardless of need or disability. Different types of students have and will continue to have different needs and require different supports. Some of those supports can indeed be provided in an inclusive setting. Moreover, even in the best of circumstances, with access to resources and excellent, well-trained teachers, there will be those who require more intensive supports that can only be provided in alternative settings.

The CRPD committee (2023) and the German Institute for human rights (which reports to the CRPD-Committee in Germany) criticized the progress of Germany on inclusive education. There is much to endorse about the CRPD. From this perspective, the assessment by the CRPD Committee is evaluating inclusion against an unrealistic and unachievable benchmark that doesn't best meet the needs of all students with disabilities. When full inclusion is viewed as the

end goal, one must admit that Germany is far from achieving it, especially if full inclusion means that all students with special needs are always taught in the regular education classroom with supports (Kauffman et al., 2018). Interestingly, the CRPD neither prohibits nor endorses special education schools. There was considerable debate and differing opinions about special schools and separate settings during the drafting process of the CRPD (Anastasiou et al., 2019).

There is much work to be conducted in regular education schools and classrooms to build capacity to support students with disabilities in inclusionary settings in Germany. Some view the influence of evidence-based practices and special education in regular education critically, particularly when it comes to implementation of evidence-based methods (Schumann, 2024). Evidence-based approaches and special education is characterized as deficit-oriented, grounded in a medical model of disability. They see this as another encroachment of special education into regular education.

Conversely, the CRPD Committee attributes the lack of progress toward meeting the CRPD article 24 to the presence of special schools and reject the idea that development of an infrastructure to support students with disabilities can also encompass special education schools. An important issue continues to be whether a particular school is equipped to provide the kind of programming and supports a particular student with disabilities may need for a quality education (Casale, 2024; Ahrbeck et al., 2021). Additionally, there are continued needs of special education teachers to be prepared for inclusive settings. Similarly, regular education teachers often lack competence in inclusive education. Surveys frequently reveal that regular education teachers are often unsure on how to teach and include children with cognitive or multiple impairments (Deutsches Institut für Menschenrechte, 2023).

The CRPD (2006) did not clearly define inclusive education. It is unlikely that inclusive education can be overly prescribed by a policy across the varied contexts in which it will be implemented. To some degree, each country will have to interpret inclusionary goals in a nation specific way. However, there is an ideological focus in inclusive education that has opened the door to a radical version of an ideology that calls for the capricious dismantlement of current systems designed to support students with disabilities (CRPD-Committee, 2016). For example, The Salamanca Declaration (1994) which is considered a milestone for the push for inclusive education and is now prompting the dismantlement of supports for students with disabilities largely along ideological grounds (UNESCO, 2024, Section 9; Hornby & Kauffman, 2023).

With careful and gradual planning, it is feasible to create an inclusive and special education infrastructure that incorporates the range of specialized supports required for students with disabilities that acknowledges the full continuum required. This continuum requires specialized supports from full inclusion to the full range of specialized settings that will be required for some students with disabilities with severe special needs. However, if the goal is full inclusion where there are no exceptions, where all students are grouped together in one classroom regardless of disability and need, then it is a problematic approach. It is this second conceptualization that is of concern.

In Comment No. 4 on Article 24, the CRPD Committee emphasized that inclusive education requires all children to be included in the same classroom, and that any special setting should be temporary (CRPD Committee, 2016, p. 12). The Committee provides authoritative guidance on the provisions of the Convention on the Rights of Persons with Disabilities through general comments. These comments aim to assist State Parties in fulfilling their obligations (CRPD Committee, 2024). Comment No. 4 on Article 24 was published 10 years after the

inception of the CRPD and 7 years following Germany's ratification of the CRPD. While these comments are crucial additions, they are interpretations of the original text of the CRPD, and interpretations can vary, especially among stakeholders such as activists, policymakers, teachers, parents, and researchers. Anastasiou et al. (2019) note that during the drafting of Comment No. 4, countries like Australia and Germany opposed a narrow interpretation of Article 24 and advocated for maintaining a diverse and flexible education system that includes specialized units and effectively addresses special educational needs (p. 31).

Interpretations like Comment No. 4 focused on full inclusion are misguided. To be successful, some students with special needs need an intensive support system, often requiring small groups, pull out programs in alternative classrooms, and intensive networking and wraparound coordination with different service providers, social work, and a therapeutic environment. Not all, but some students with special needs need an intensive support system. These services are currently difficult to provide in regular schools but are usually available in special schools (Casale, 2024).

In Germany, the support systems for students with special needs within regular education are in urgent need of reform. The challenges of inclusion have been notably underscored by the AiBe Study (Ahrbeck et al., 2021), which was commissioned by the Senate Office of the State of Berlin to explore "Initial experiences with the development of inclusive schools in Berlin." This longitudinal study, conducted from 2011 to 2017, surveyed nearly 1,300 students from 23 primary school classes (grades 1 to 6) and five secondary school classes (grades 7 to 10) in Berlin. The study focused on collecting quantitative data regarding cognitive performance development and school-related attitudes and experiences. Additionally, over two thousand

guideline-based interviews were conducted with students, teachers, school administrators, and parents as part of a qualitative research component to monitor the process.

Results from the AiBe study indicated significant issues in the allocation of resources for students with special needs. Particularly, teaching students with social-emotional and behavioral challenges has proven difficult. Temporary placement in special facilities is often seen as crucial, almost a prerequisite to prevent the failure of inclusive schooling. Moreover, in terms of cognitive development, students with special needs did not achieve the expected progress through inclusive schooling compared to other educational settings. Many schools lack a clear conceptual framework, and children with more severe special needs often struggle to form social connections, despite significant efforts from teachers and parents. The study also highlighted the necessity for intensive, personalized assessments to develop and target educational goals, especially in the areas of learning, language, and emotional-social development. The need for intensive, personalized assessments to develop and target educational goals for students with disabilities was a pressing concern at the study's outset; and this view has only intensified with growing experiences with inclusive reform in schools (Ahrbeck, 2021; Ahrbeck et al., 2021).

### **Institutional Systems Change**

There are systemic changes needed within German educational and social policy to better integrate children with disabilities into mainstream educational settings, but institutional systems change should emphasize structural coherence that aligns with the German educational system. The Federal Participation Act (BTHG) is heralded as a landmark in German social policy. It was enacted to improve the situation of children with special needs in regular schools. A significant advancement of the BTHG was the extension of the right to self-determination and choice for those entitled to benefits, along with the decoupling of participation benefits from the welfare

system of social assistance (Holtkamp & Stubican, 2021, p. 27). Despite these advances, the Act has not resolved the issue of "pillarization" in the administrative structures that manage the education and participation of children with disabilities. Specifically, while the educational ministries of the federal states or local school departments are responsible for the institutional aspects of schooling (curricula, staffing, funding, etc.), measures to integrate children with disabilities into mainstream schools are managed by local or regional authorities under the social ministries. This division complicates the process for parents, who cannot assume that their children will be admitted to their chosen mainstream schools or that necessary adjustments will be made for their education based on individual needs.

This structural division runs through German social policy and often complicates the participation of children with disabilities in educational institutions. Unlike their peers, parents of children with disabilities must navigate additional bureaucratic processes to secure necessary accommodations through integration assistance providers (Brettschneider & Klammer, 2020, p. 48). The "Great Solution" proposed in Book Eight of the Social Code aims to address these challenges by including the interests of children with disabilities and providing procedural guides to assist parents in navigating the system.

### **Specialized Teacher Preparation**

Specialized training in inclusive special education is essential for both special and general educators to equip them with the necessary skills and knowledge for effective teaching in inclusive and special education settings. As Germany progresses toward its inclusionary objectives, the preparation of general and special education teachers emerges as a critical area requiring enhanced focus and discussion to facilitate systemic changes in both inclusion and special education.



Achieving realistic inclusion in regular education schools for students with disabilities will require special and regular education teachers with the specialized pedagogical and didactic skills. These programs do devote significant time to understanding types of disabilities, compensation strategies, and legal rights, which are crucial for supporting the successful inclusion of students with disabilities into regular education. However, teacher preparation programs at most German universities, including special education, often emphasize subject-matter expertise over pedagogical competencies. Both are needed, but there is a disparity (Rackles, 2024). The federal government currently seeks to address this disparity with a "quality offensive for teacher training" (Gräf, 2022). Germany claims a comprehensive system of vocational preparation and support for students who are not directly transitioning into vocational training or higher education. This system ensures that students who may not find opportunities in the primary labor market still have viable career paths, facilitated by collaborations between special schools and various vocational entities (Lachwitz, 2018).

Despite criticism, there is much that is laudatory about the German educational system that arguably should be retained. Supporting students with disabilities is a complex issue, and often there is no "one size fits all" solution (Ahrbeck, Felder, Schneiders, 2018). There are voices calling for the dismantlement of special education in Germany (see Ahrbeck & Felder, 2020). However, instead of dismantlement, a more objective, reasoned, and incremental systems change approach is necessary. An inclusion and special education systems change approach should be adopted that builds institutional capacity and fosters inclusive special education. This approach should leverage the strengths of the current German educational system, enhance the quality of alternative settings where necessary, and involve both regular and special education teacher preparation to support students with disabilities in inclusive and special education settings.

Furthermore, systems change should focus on implementing supportive measures to overcome institutional and educational barriers to inclusion. These efforts should aim to facilitate the inclusion of students with disabilities in regular educational settings from an evidence-based perspective (Hornby, 2014).

### **Inclusive School Reform in Tanzania**

Efforts and challenges in implementing inclusive education in Tanzania focus on infrastructural and societal barriers that hinder the implementation of an inclusive special education. There are emerging efforts aimed at creating inclusive educational environments and enhancing special education programs in Tanzania. These inclusive and special education initiatives are focused on integrating students with disabilities and ensuring that special educational systems are in place that supports all students with disabilities. Moreover, there are social-cultural issues and a need to promote awareness and acceptance of individuals with disabilities within the broader school community. Such efforts are crucial in fostering an inclusive society and providing quality educational opportunities to every child with a disability.

Tanzania, as a member of the international community, has committed to various international declarations aimed at promoting an accessible, inclusive, and special education for all children. These include the Convention on the Rights of the Child (1989), the Convention on the Rights of Persons with Disabilities (CRPD) of 2006, and the Education for All (EFA) policy document. Following these commitments, Tanzania officially documented the first phase of the National Strategy on Inclusive Education in 2009, shifting its educational approach to adopt inclusive education starting in 2010. However, despite these efforts, Tanzania still faces significant challenges in realizing the right to education for children with disabilities. The lack of educational opportunities for most young people with disabilities persists (Fangwi, 2020; Sun &

Xin, 2020). This educational gap reinforces societal beliefs that children with disabilities cannot learn or should not be subjected to the stress of learning.

There are many challenges to providing an inclusive and special education in Tanzania. Some are physical barriers such as inaccessible school buildings. However, there are shortages of trained teachers for those with disabilities. Moreover, there is a lack of appropriate teaching materials. These areas severely limit educational access for millions of children with disabilities. Gender inequities also persist, compounded by cultural biases against women that lead families and schools to allocate fewer resources and opportunities to female students with disabilities (Fangwi, 2020; Geleta, 2019; Sun & Xin, 2020; University of Dar es Salaam, 2022).

Most special education services in Tanzania are provided at the primary school level through residential (boarding) and non-residential special schools—both government and those supported by humanitarian organizations and churches (Possi & Millinga, 2017; Fajarwati, 2017). These are also available in special units integrated into regular schools. Despite these provisions, inclusive education, which integrates all children into the same classroom environment, has not yielded the expected educational outcomes in Tanzania. Factors such as large class sizes, low school enrollment rates, and a high dropout rate among children with disabilities (50%), combined with high disability prevalence and challenging geographical areas, have led to significant educational underachievement among young people with disabilities. Moreover, stigmatization and discrimination against students with disabilities further hinder school attendance (Mkama, 2024, p. 129).

### **Deaf Students in Tanzania**

The unique challenges faced by students with albinism in Tanzania call for specialized support and inclusive practices to ensure their right to an inclusive special education. Specific

educational needs and challenges faced by Deaf students in Tanzania highlight the inadequacy of special and inclusionary support services. Since 2010, special and inclusive education for Deaf learners in Tanzania has been formally recognized, with the establishment of units, special schools, and integration or inclusive classes (Mkama, 2021; Mapunda et al., 2017). Despite various initiatives to provide a special and inclusive education to all learners regardless of their backgrounds, significant challenges persist. These challenges include how Deaf learners are provided services and supports in inclusive settings and their transition into community life. One major challenge is language and communication, exacerbated by the lack of adequate sign language interpreters (Tanure et al., 2024; Xie, Potmėšil & Peters, 2014). Additional structural issues include a shortage of specialist teachers, poor classroom conditions, and overcrowded classrooms, which hinder the educational progression of many Deaf learners to higher levels (Dela Fuente, 2021; Mapunda et al., 2017; Mkama & Storbeck, 2023; Kimaro & Kileo, 2023; Rishaelly, 2017).

Research has consistently shown poor preparation for the transition of Deaf learners from school to community life (Bonds, 2019; Curle et al., 2016; Hlatywayo & Ncube, 2014). In Tanzania, inadequate employment opportunities for Deaf individuals often stem from their inability to access higher education, an insufficient transition system from school to community life, and limited access to information on career pathways (Mkama, 2021; Mkongo, 2019). Consequently, many Deaf learners who do not proceed with further studies become dependent on their families for support. This dependency is problematic, especially as nearly 26 million people lived in extreme poverty in Tanzania in 2022 (Cowling, 2024), out of a population nearing 70 million (Worldometer, 2024). Some Deaf learners find employment only in low-paying, challenging work environments (Ntamanwa, 2015; Charles, A., & Mkulu, 2020). Deaf and

deafblind students require additional specialized support, including access to life coaching and specialist deaf career advisors, to help determine appropriate career paths and facilitate a smoother transition into the workforce (Kyzar et al., 2020; Kyzar et al., 2016; Zatta & McGinnity, 2016; Wilson-Clark & Saha, 2019).

### **Students with Albinism**

There are unique challenges faced by students with albinism in Tanzania that call for specialized support and inclusive practices. Albinism is an inherited condition characterized by a lack of melanin production, affecting vision and often skin pigmentation. Children with albinism may experience a variety of vision problems such as astigmatism, photophobia, nystagmus, low vision, and refractive errors. They are also at increased risk for sunburn and skin cancer due to reduced melanin in the skin (NHS, 2023). In Tanzania, the prevalence of albinism is significantly higher than in other African countries, with 1 out of every 1,400 Tanzanians affected, compared to 1 in 15,000 across the continent. This makes Tanzania the country with the highest incidence of albinism worldwide (ENACT, 2022).

Persons with Albinism (PWA) in Tanzania face widespread discrimination and stigmatization. There is a dangerous myth propagated by some witch doctors that body parts of PWAs possess magical properties, leading to mutilation or murder of individuals with albinism, including children. The government has responded by placing some children in shelters, special schools, or boarding schools to ensure their safety. However, this approach is controversial as it may compromise the children's rights to family and community life and often limits their educational opportunities (ENACT, 2022).

In the educational setting, children with albinism require specific accommodations, such as assistive technology, large print materials, extended time for tasks, and flexible seating

arrangements. Despite these needs, some students are placed in classrooms with only one teacher and as many as 80 other children, making personalized learning and adequate support challenging. Often, teachers lack training in special education or in addressing visual impairments, which can lead to poor academic performance and the misplacement of students in special schools despite their potential to succeed in regular classrooms with appropriate support (Ndomondo, 2015). Moreover, even when eye care is provided, it is not always satisfactory, as glasses do not completely resolve their vision issues (Franklin et al., 2018).

Many children with albinism do not have their healthcare needs, including skin care and vision care, adequately met. A significant number never receive an eye exam, which is crucial for determining the best learning arrangements and accommodations for them. Currently, there is limited information about the overall educational outcomes for children with albinism in Tanzanian schools and the specific special and inclusionary supports they receive. Further research is necessary to address educational, health, and quality of life outcomes for this unique and vulnerable population (Ndomondo, 2015).

### **Inclusive School Reform in the United States**

The landscape of inclusive school reform and special education is reviewed in the United States along with policies, and practices that shape the educational experiences of students with disabilities. Schools in the United States are legally required to provide students with disabilities who have educational needs related to their disability in the United States a special education. The legal framework governing special education was originally passed by the United States Congress and signed into law by President Gerald Ford in 1975 as the Education for All Handicapped Children Act (EHA), also known as Public Law 94-142, later renamed The Individuals with Disabilities Education Act (IDEA).

This landmark legislation ensured that all children with disabilities are provided a free appropriate public education (FAPE) in the least restrictive environment (LRE). The goal of this legislation was intended to "ensure that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living" (U.S. Department of Education, 2004, Section 300.1).

More specifically, special education is legally defined in the United States at the federal level as: "Special education means specially designed instruction, at no cost to parents, to meet the unique needs of a child with a disability, including: (A) instruction conducted in the classroom, in the home, in hospitals and institutions, and in other settings; and (B) instruction in physical education" (U.S. Department of Education, 2004, Section 602[29]). Moreover, there are many policies reflected in IDEA that promote integration and inclusion within the context of special education in the United States. However, IDEA does not mandate full inclusion (Yell & Prince, 2022). Rather, special education is pragmatically focused on the principles of appropriateness, individualization, specialized instruction, LRE, and high expectations associated with "access to the general education curriculum in the regular classroom, to the maximum extent possible" (U.S. Department of Education, 2004, Section 682[c][5][A]).

Full inclusion has been an ongoing discussion in the United States since at least the 1980s and the onset of the Regular Education Initiative (REI), the first main policy attempt to merge special education under the umbrella of regular education to promote full inclusion. Many in the field responded with deep concerns regarding full inclusion and the unification of general and special education, especially regarding the evidence for a full inclusion mandate (Zigmond, Kloo, & Volonino, 2009).

There is growing evidence for inclusion and special education practices to support the integration of students with disabilities in inclusionary settings. However, this evidence-base for inclusionary practices is quite different from evidence to support a full inclusion mandate. There continues to be a concern about evidence for full inclusion mandates (Kauffman et al., 2018), especially considering there are thirteen different areas of disability served under IDEA, each with their own conceptualizations, issues, needs, and history.

Despite concerns, the goal of including students with disabilities has emerged as an important macro-social validation goal in special education (Walker et al., 1998). Macro-social validation refers to the process of gaining recognition, approval, and valuing of a field's professional activities by larger constituencies such as the public and policymakers. Walker et al. emphasized the need for the field of special education to broaden its agenda beyond field-specific interests to address larger societal issues of importance. Currently, the inclusion of students with disabilities is one of the issues of significant importance, both in the US and internationally.

The 45th Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act (IDEA) provides a detailed analysis of the educational environments for students ages 5 through 21 served under IDEA, Part B, by disability category.

Table 1. Percent of time spent in regular education settings by disability area.

Disability Category	80% or more of the day	40% through 79% of the day	Less than 40% of the day	Other environments
Speech or language impairment	88.3%	3.7%	3.7%	4.3%
Specific learning disability	75.3%	19.1%	3.8%	1.9%
Other health impairment	70.2%	18.1%	7.7%	4.0%
Developmental delay	69.8%	14.6%	13.8%	1.7%
Visual impairment	69.7%	11.3%	8.7%	10.2%



Hearing impairment	64.5%	13.3%	10.2%	12.0%
Orthopedic impairment	57.6%	14.5%	20.1%	7.8%
Emotional disturbance	54.7%	17.0%	14.6%	13.7%
Traumatic brain injury	51.5%	20.8%	19.6%	8.2%
Autism	40.8%	17.1%	34.2%	7.8%
Deaf-blindness	30.1%	11.0%	32.2%	26.7%
Intellectual disability	18.7%	27.7%	47.2%	6.4%
Multiple disabilities	15.3%	17.9%	43.5%	23.2%
All disabilities	66.6%	16.0%	12.6%	4.8%

As illustrated in Table 1, inclusion rates vary significantly by disability type for bodily inclusion. For instance, 75.3% of students with specific learning disabilities were in regular classrooms for 80% or more of the day, compared to only 18.7% of students with intellectual disabilities. Students with speech or language impairments had the highest inclusion rate, with 88.3% spending 80% or more of their day in regular classrooms. Conversely, students with intellectual disabilities, multiple disabilities, and deaf-blindness had lower inclusion rates, with substantial percentages spending time in separate environments.

The variability resulting from LRE is often critiqued negatively by those focused on inclusive school reform. However, variability is to be expected especially when risk factors for disability is taken into consideration (Kauffman, Burke, & Anastasiou, 2022). LRE and alternative placements are individualized decisions based on IDEA and if implemented in a procedurally correct way, should result in a FAPE that responds to the unique needs of the learner with disabilities. moreover, the primary purpose of special education is to provide specially designed instruction to students with disabilities.

EHA has been updated and reauthorized several times. In 1990, it was renamed IDEA. The 1990 reauthorization also added autism and traumatic brain injury (TBI) as distinct disability categories, acknowledging the specific educational needs associated with these conditions.

Previously, autism was often included under the category of "Other Health Impairments" (OHI) and/or "Emotional Disturbance" (ED), while traumatic brain injury was generally served under "Orthopedic Impairments" and/or OHI. Additionally, the 1990 amendments emphasized transition services to assist students with disabilities in moving from school to post-school activities, including employment and post-secondary education. These changes also strengthened the focus on ensuring that students with disabilities have access to the general education curriculum. Language was included to clarify the importance of appropriate placement, ensuring students were educated in settings that would best meet their needs.

IDEA has undergone several amendments. The 1997 amendments to IDEA brought significant enhancements to the law, promoting inclusive practices. These changes required students with disabilities be included in state and district-wide assessments to ensure their educational progress was monitored alongside their peers. General education teachers were required to be part of the IEP team. The amendments also introduced stronger disciplinary provisions to ensure that students with disabilities continue to receive FAPE even when facing suspension or expulsion. Additionally, the 1997 reauthorization encouraged the use of positive behavioral interventions and supports (PBIS) to address behavioral challenges. Further emphasis was placed on ensuring that students with disabilities were provided access to the general education curriculum and were placed in the least restrictive environment (LRE) that met their educational needs.

The 2004 reauthorization, known as the Individuals with Disabilities Education Improvement Act, aligned IDEA with the No Child Left Behind Act (NCLB) to ensure that students with disabilities were included in accountability systems. This reauthorization required that special education teachers be highly qualified, emphasizing the need for skilled educators. It

also introduced the response to intervention (RTI) approach to identify students more effectively with learning disabilities. The 2004 amendments aimed to streamline the IEP process to reduce paperwork and administrative burdens, allowing educators to focus more on educational outcomes. Enhanced early intervening services were also included to support students who had not yet been identified as needing special education but required additional academic and behavioral assistance. This reauthorization continued to emphasize the importance of access to the general education curriculum, LRE and placement.

### **Who, What, How, and Where?**

Despite advances in the field, the "Who, What, How, and Where" of special education continues to be contested in the United States (e.g., Zigmond, et al., 2009). There are sharply contested and different views regarding on the nature of a disability construct, what are relevant goals, how should instruction be provided, and where those practices should occur. The issue of bodily inclusion has been a controversial topic, causing division in the field. The discussion of inclusion also included discussions of the academic and social-behavioral benefits, which can differ according to the type and nature of disabilities and impairments.

A broad consensus has emerged that inclusion reform is needed and is a socially valid goal. However, there are many diverging views on the "Who, What, When, and Where in the United States. Some are promoting an anti-realist disability position, arguing for the dismantlement of special education and a full inclusion mandate. Others agree there is merit to inclusion, but the fundamentals of the current disability framework is conceptually valid. In contrast, this view adopts a disability realist perspective. Disabilities are real but multi-faceted and to dismantle special education infrastructures for supporting students with disabilities is irrational. Instead, and the field of special education should focus on revitalizing special

education (Kauffman, 2022) and take the best from inclusion and special education (Hornby, 2015). The field especially diverges on the role of special education to support students with disabilities in regular education settings, with some promoting its dismantlement and replacement (Taylor & Sailor, 2023).

## **Conclusion**

In this paper, views on inclusionary reform were provided from three countries, each with a slightly different emphasis and focus. The CRPD and associated inclusionary reforms are impacting special education throughout the world, sometimes in positive ways, but also in negative ways as well. There are important international disability and human rights arguments and needs to build capacity and infrastructure in regular education settings for supporting inclusion and special education. Building this educational capacity to support all students with disabilities internationally is of critical importance. However, the complexity of the endeavor quickly becomes clear. Moreover, there are significant structural and cultural barriers that remain in all three countries that will continue to challenge the field.

Achieving realistic inclusionary goals internationally will require a sustained, well-funded, multifaceted approaches that addresses research to inclusionary special education practice. This includes reexamining teacher preparation programs, reallocating resources, and fostering an inclusive culture within both educational institutions and broader society that recognizes the special needs of individuals with disabilities. Only through such comprehensive efforts a vision of inclusion be realized that balances socially valid inclusionary goals with a special program that meets the needs of the individual student with disabilities. In this regard, it is recommended that a realistic, incremental, evidence-based, and balanced approach be adopted (Kaufman et al., 2018).

Rather than dismantlement of the current special education system to promote full inclusion, disability and inclusion realism is needed (Felder & Burke, 2024; Kauffman et al., 2018; Kauffman, 2022). A disability and inclusion realism that focuses on a strategic, empirical, and socially valid blending of special and inclusive education (Hornby, 2014, 2015). Such an approach is needed that honors the laudable goals related to inclusion but is also realistic, objective, and empirical in carrying those goals out. To promote the capacity building needed for an inclusive special education, the following is suggested in conceptualizing school reform. Research should be conducted at an international level focused on questions regarding what inclusionary practices work, for whom, and under what conditions.

### **1. Evaluate Inclusive Special Education Practices**

- Investigate the effectiveness of existing inclusive special education programs and policies.
- Identify inclusionary evidence-based special education practices.

### **2. General and Special Education Teacher Training and Professional Development:**

- Assess the current state of teacher training programs regarding inclusive special education for both pre-service and in-service in regular and special education.
- Develop and implement enhanced training that equip teachers with the skills and knowledge to support learning needs in inclusive classrooms.

### **3. Resource Allocation and Accessibility:**

- Study the allocation of resources across different schools and regions to identify disparities.
- Propose strategies for equitable distribution of funding, technology, and support services to ensure all students have access to the necessary tools for learning.

**4. Societal Attitudes and Cultural Change:**

- Examine societal attitudes towards inclusion and disability diversity within the broader community and educational institutions.
- Develop and test initiatives aimed at fostering a culture of acceptance, belonging, and support for inclusion among students, parents, teachers, and the general public.

**5. Longitudinal Outcomes on Inclusive Special Education:**

- Conduct longitudinal studies to track the academic, social, and emotional outcomes of students in inclusive settings.
- Compare these outcomes with those of students in non-inclusive settings to provide evidence-based recommendations for policy and practice.

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