The Elusive Meaning of Inclusive Education in Five Countries—and the United States

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Abstract

In this commentary, I reflect on the papers in this special issue that describe inclusion in five countries. More specifically, I highlight several themes among the authors' descriptions of both progress and challenges as their respective countries try to provide students with disabilities a stronger, more inclusive educational experience. I compare and contrast this effort to efforts in the United States to properly understand and implement an inclusive education that benefits all children and youth with disabilities.

I've been asked to respond to the five papers in this special issue on the inclusion of students with disabilities in India, Japan, Norway, Saudi Arabia, and South Korea. I'm delighted to do so. However, I want to make two points clear from the start. First, my response is necessarily brief and selective. Second, its truthfulness depends both on how accurately I read the authors' papers and on the accuracy with which they have represented inclusive education in their countries—no mean feat when attempting to characterize a movement built on a construct with multiple meanings in nations with many millions of people, representing a very broad range of religions, cultures, races, and educational expectations and needs. Readers should keep these caveats in mind as I share my understanding of similar and dissimilar features of inclusion across the five countries and how they reflect and are different from education practice in the United States.

Toward Greater Inclusion

India

In the 1970s, according to Balasubramanian and Banerjee, Indian students with disabilities (SWDs) were educated in a separate system. After India signed the 1994 Salamanca Statement and Framework for Action on Special Needs Education (UNESCO and Spain's Ministry of Education and Science), "inclusive education" became an important phrase in the country's official messaging and policymaking. Such increased attention eventually led to a new National Educational Policy in 2020. Its aspirational goals included the development of an education system that emphasized pre-primary education and basic literacy and numeracy for all students by Grade 3; a system in which students with and without disabilities learn together; and a system that recruited more special educators with cross-disability training and that provided preservice training to general educators to teach SWDs. By 2021, 61% of Indian SWDs were attending mainstream schools.

Despite the creation of a National Educational Policy and the increased enrollment of SWDs in mainstream schools, India's special-needs children and youth continue to face serious challenges accessing education beyond primary school. Only 9% complete secondary school. Those in rural areas with autism or cerebral palsy and girls with disabilities are least likely to be enrolled. Moreover, Balasubramanian and Banerjee report that, although the Indian government promotes inclusion initiatives, it also supports a seemingly contradictory "dual-track" system of (a) government-funded *inclusive* schools for children with so-called mild and physical disabilities and (b) government-funded or nongovernment-agency *special* schools for students with moderate/severe disabilities.

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Japan

Akiko Kaizu writes that before 2006 special schools and classrooms were only available for students with relatively severe disabilities (e.g., sensory, intellectual, and physical disabilities and health impairments). By the 2000s, there was widespread recognition that general education was failing to adequately instruct many students with high-incidence disabilities (e.g., learning disabilities). This contributed to a 2007 revision of Japan's School Education Law, which required individualized educational plans and special needs coordinators to facilitate services among schools, parents, and medical providers. The law also mandated the reorganization of special needs schools to accommodate students with high-incidence disabilities.

While this reorganization was meant to strengthen the quality of SWDs' education, critics noted that many SWDs were moving from general to special classrooms. According to Kaizu, enrollment data support the assertion. Although the number of Japanese students in the general population decreased by about 10% in the past 10 years (due to declining birthrates), SWDs' numbers have doubled. More to the point, enrollment in special schools, special classrooms, and resource rooms has become about 1.2, 2.1, and 2.5 times greater, respectively. This trend, says Kaizu, rather obviously contradicts the nation's goal of increasing the number of students with and without disabilities who learn together.

Norway

Kari-Anne Naess reports that Norwegian students who demonstrate inadequate academic achievement despite participating in "adapted education" in general classrooms have a right to special education and to an individual education plan (Special education services do not depend on a formal diagnosis). In primary and secondary education, Naess says, 8.1% of Norwegian students receive special education. The national policy calls for special education to occur in mainstream classes in a local school. However, parents may apply for alternative placements and students 15 years of age and older may make such decisions for themselves. Despite that fewer and fewer special needs students are in separate school settings, 52% are still placed there.

As for the Norwegian SWDs in mainstream classrooms, Naess highlights an observational study conducted by Blackman and colleagues of 159 SWDs. The SWDs' classroom behavior, according to the researchers, was notable for its "limited academic engagement, operationalized as [participating] in academic discussions, listening to the teacher, and completing assignments individually or with peers." Blackman et al. conclude that "the potential for learning among [SWDs] was limited in mainstream

education." And they write, "only to be present. . .is not satisfactory. [Learning] also requires inclusive practices." Factors limiting the likelihood of such practices were infrequent collaborations among staff, heavy teacher workloads, teacher assistants lacking instructional competence, and the absence of educational resources.

Saudi Arabia

Abdulaziz Alsolami explains that historically SWDs were placed in specialized institutions. In 1958, the Saudi Ministry of Education began providing financial, medical, and educational services for blind adult students in "scientific institutes." In 1962, the Department of Special Learning was created to oversee rehabilitation and education for children with intellectual disabilities and visual and hearing impairments in special schools and other separate settings. In the 1970s and 1980s, there was a shift toward integrating SWDs into mainstream schools, but, Alsolami says, progress was slow.

In the 1990s, the United Nations highlighted the inadequacies of Saudi Arabia's special education services, two examples of which were that many SWDs were excluded from mainstream schools and there were too few trained teachers. In response to the United Nations report, Alsolami writes, that Saudi Arabia established the General Secretariat for Special Education in the Ministry of Education. Shortly thereafter, this new office produced the Regulations [for] Special Education Programs and Institutes. Modeled after U.S. legislation, the document outlined the rights of students with learning disabilities, including the right to individualized education programs. In 2004, the Ministry of Education published guidelines to integrate SWDs in mainstream classrooms.

Despite such official encouragement, and ongoing policy directives to strengthen the 2004 guidelines, Alsolami states that "special education in Saudi Arabia is still a work in progress." He reports that the "most recent information [from] the Saudi Ministry of Education in September 2023 [indicates that about] 10% of Saudi Arabia's total population of [SWDs were] involved in inclusive settings."

South Korea

The first special class for SWDs in South Korea was created in a single mainstream elementary school in 1971. By 1995, Ae-Hwa Kim writes, there were 3,440 special classes in mainstream schools; by 2008, 6,352 such classes; by 2022, 27,979 classes. Kim refers to this arrangement as inclusive education and explains that its legal mandate is the Act on Special Education for Persons with Disabilities of 2007. The Act promotes social and curricular inclusion in addition to physical inclusion. More specifically, it describes provisions for improving teachers' capacity to make instructional adaptations; it requires barrier-free

educational environments; and it calls for more itinerant educators to support SWDs' learning. According to a 2022 Special Education Annual Report, 72.8% of South Korea's SWDs were placed part-time or full-time in mainstream schools, a notable increase from 52.6% in 1997. The percentage of SWDs in *full-time* mainstream schools was 16.9% in 2022 as compared to 0.0% in 1997.

Kim writes that 16.9% of SWDs in full-time mainstream placements are either in general schools with special classes or in general schools *without* special classes. Those in schools without special classes have been instructed by itinerant teachers about whom Kim expresses concern: They lack training and instructional expertise and there is inadequate collaboration between them and general educators.

Summary

In the last several decades, in each of the five countries highlighted above, there has been an indisputable increase in attention and concern directed toward SWDs' education. Some countries have made concerted effort to place SWDs in the educational mainstream. Other countries, it seems, have worked just as hard in the spirit of inclusiveness to develop special schools and classrooms. Yet, despite the notable increase in attention and concern—and the creation of government agencies, rules and regulations, and new systems of service delivery—the education of SWDs in the five countries has proceeded in fits and starts. Progress has been incremental, not revolutionary. Moreover, there is little evidence in any of the highlighted countries that efforts in mainstream and separate settings have strengthened SWDs' academic performance, school behavior, or social development. Alsolami's description of the present status of inclusive education in Saudi Arabia would appear to apply to all five countries: "Still a work in progress."

Implementation Challenges

I would require more space than I've been permitted (and more knowledge than I have) to adequately explain why these five showcased nations appear to have made only modest progress in developing education systems that demonstrably benefit SWDs. The authors seem to have been forthright in describing their nations' ongoing challenges. I've briefly mentioned several. Some are shared among the countries; others are connected to a particular nation's character or circumstance. Following is an elaboration of three challenges common to all.

Definitional Confusion

India. Balasubramanian and Banerjee say that "inclusion" is poorly understood in India. Following the publication of the influential 1994 Salamanca Declaration, inclusion became a "buzz word" that did little to clarify how best to serve SWDs. Balasubramanian and Banerjee partly attribute the confusion to the fact that "inclusion" is not a term native to India. "It was embraced," they say, "due to Western influences," and its origin should raise "concerns about the concept's cultural appropriateness and relevance [to an] Indian context." I infer from the authors' telling, that Indian policymakers and educators have made a greater effort to understand and define the term than to systematically apply it in practice. Balasubramanian and Banerjee do not present exemplars of how it has been operationalized.

Norway. Naess writes that "inclusive education" appears as a principle in Norway's important education documents, but it lacks "a single unified description or . . . common operationalization." Rather, she writes, "[i]t is described in different ways within and across documents." Moreover, it is often described in theoretical terms. She reports that in a content analysis of Norway's most recent curriculum for primary education, a colleague of hers identified "diversity," "participation," and "democracy" as the most frequently used concepts related to inclusion.

Notwithstanding these abstractions, Naess says that an official means of realizing inclusive education is *adapted education*. In principle, schools implementing adaptive education, "accommodate all students while considering individual and social differences." It is conducted by general educators in mainstream classes and involves the modification of curricula and instruction to accommodate students' diverse backgrounds. Adaptive education is *not* individualized instruction. Thus, "inclusive education" in Norway seems defined at a general level and applies to students with and without disabilities. According to Naess, evidence suggests that it does *not* benefit many SWDs (see below).

Japan. In contrast to India, Japan has seemed less concerned about conceptualizing inclusive education; more interested in operationalizing it—as a means of both formalizing it as a process and giving it currency. Japanese policymakers also seem to have designed a system with greater specificity than policymakers in Norway and India. Japan's operationalization was unveiled in 2012 and became known as Special Needs Education. It promoted four "learning environments": special-needs schools and classrooms, resource rooms, and mainstream classrooms. Together, they constitute a "multitrack system," or continuum of placements and services. "Japan," writes Kaizu, "[was not] trying to establish a form of full inclusion in general education classrooms."

Cultural Influence

In 2006, the United Nations produced its influential Convention on the Rights of Persons with Disabilities, which stated that children with and without disabilities

should learn in the same place. Support for Japan's multi-track system notwithstanding, scholars have criticized the Special Needs Education policy on the grounds that it is not likely to align Japanese education with the United Nations' document; that is, unlikely to transform it into a more inclusive system.

Others responded that providing the Special Needs Education policy in Japan's general classrooms is problematic. Kaizu says, "Students with high-incidence disabilities [such as learning disabilities, attention deficit-hyperactivity disorder and autism spectrum disorder] often fear prejudice and labeling and are resistant to being considered different or receiving special treatment." She continues, "Consequently, there may be many cases where necessary [individualized] support. . .is not provided"; and she writes, "breaking away from the traditional culture of conformity and establishing a school culture that recognizes diversity is essential for promoting inclusive education in Japan."

With this as background, Kaizu describes increased enthusiasm in her country for alternate forms of what she says is inclusive education such as multi-tiered systems of support (MTSS). In Japan, MTSS is known as the Multilayer Instructional Model. It is operationalized differently than how MTSS is typically discussed in the U.S. Most importantly, in accordance with the Multilayer Instructional Model, all levels of instructional supports are conducted in general classrooms with teachers implementing Tiers 1 and 2, an arrangement meant to convey the impression that all students are treated similarly when (in principle) differentiated attention and instruction are offered to some. Kaizu makes some mention of this model's effectiveness but does not provide specifics.

Inadequate Resources

Too Few Teachers With Instructional Expertise. Most authors describe inadequate licensure and training programs for special educators and general educators. Alsolami writes that prior to 2015 there was no effective teacher preparation in Saudi Arabia. He says his country still "lacks sufficient numbers of trained teachers to engage with SWDs [,]" a deficit he characterizes as a serious barrier to inclusive education.

Balasubramanian and Banerjee report that India's National Education Policy made teacher training a national priority, but it failed to recognize systemic barriers to such training. The authors state that

> Given the vast shortage of teachers trained and qualified to work with [SWDs], the [National Education Policy's] proposed solution of short-term specialized training for all teachers is inadequate to meet the challenges of creating an inclusive educational space for [SWDs], especially [those with] significant disabilities.

"In Norway," Kari-Anne Naess writes,

> there are no clear special education competency requirements for special education teachers. Approximately 50 percent of the students entitled to special education receive their educational support from teacher assistants who usually lack formal competency in education . . . and thus do not fulfill the competency requirement for teaching.

Absence of data and accountability. The five countries face another result of inadequate resources: an absence of information to understand the nature of so-called inclusive activities and to determine their effects on SWDs' academic performance, school behavior, and social development. Kim, for example, expresses concern about South Korean schools' "curriculum rigidity" and how it may undermine inclusive education. She writes that whereas her nation publishes annual reports on assessment accommodations and instructional adaptations, it rarely publishes data on the effects of these accommodations and adaptations on SWDs' performance and behavior.

Naess writes, "Today [in Norway], the national registry system [does not collect] data on the quality of education given to [SWDs]." She says that a registry system could collect information on the nature of IEPs and instructional practices; on SWDs' learning outcomes; and on experiences of well-being that, in turn, would inform all stakeholders of the benefits of SWDs' education. The lack of such information, she says, "creates a significant gap in our understanding of the current situation for these students."

Inclusive Education in America

As in India, Norway, and other discussed nations, there is confusion and disagreement in the United States about what constitutes "inclusive education." An important way that this confusion and disagreement play out in America is in terms of "inclusion versus full inclusion." Before explaining the distinction and some of its consequences, I'd like to mention a connection between an aspect of American culture and its influence on the country's education of SWDs.

Individualism

Individualization is a core element of SWDs' education in the United States. It is enshrined in federal legislation, in case law, and in important government policies. It is closely tied to *Individualism*, a hallmark of American culture and philosophy that influenced America's founding principles of personal freedom, self-reliance, and the liberty to develop one's destiny. It distinguishes the United States from countries that place greater emphasis on the collective.

Individualism is reflected in the Individual Educational Plan (IEP), created because SWDs differ from non-labeled students and among themselves in terms of the instructional and behavioral supports that they require. A continuum of placements and services was also created to facilitate the implementation of IEPs. It was first codified in the Education for All Handicapped Children's Act of 1975 and later in IDEA (IDEA Regulations, 34 C.F.R. §300.115). It represents an array of special education placements and services more and less proximal to the general classroom (if not the general classroom) and more and less intensive in the instructional and behavioral supports provided. In choosing a placement on the continuum, educators are guided by the "least restrictive environment" (LRE) principle, which requires them to adhere to two sometimes competing requirements: (a) placing students as close as possible to typically developing peers and (b) ensuring that the selected placement provides a level of intensity and expertise from which meaningful benefit can be derived (see IDEA 20 U.S.C. §14112[a][5]).

Inclusion Versus Full Inclusion

Most advocates of students with learning disabilities, speech/language disorders, and other disabilities support the continuum of placements, and efforts to find the right placement for every child. Support of the continuum reflects a belief in the importance of high-quality instruction and skepticism about general education's capacity to provide it. For these stakeholders, the continuum and the LRE embody inclusive education (e.g., Crockett & Martin, 2024).

Many supporters of students with intellectual disabilities reject a continuum of placements for several reasons. I'll explain two. First, they want all their children and youth in mainstream classrooms full-time because they view such placements as singular opportunities to strengthen social skills, make friends, influence the attitudes of typically developing people toward SWDs, and experience a general sense of belonging (e.g., Stainback & Stainback, 1984). Second, they believe general educators have the know-how to implement such putative inclusionary strategies as MTSS, Universal Design for Learning, accommodating the curriculum, and more, which the advocates describe as scientifically validated.

Moreover, these advocates believe general educators are more likely to hold higher expectations of SWDs than other educators. Such confidence in general educators' expectations and their instructional knowledge, and a belief in the inherent normalcy of mainstream classrooms, inspired a recent Assistant Secretary of the Office of Special Education and Rehabilitation Services in the U.S. Department of Education to proclaim at many public gatherings, with enthusiasm and without qualification, that "the more time students with disabilities spend in general classrooms, the better they do academically" (see Fuchs et al., 2023). For the Assistant Secretary and many advocates of students with intellectual disabilities, nothing short of full-time placement in the general class qualifies as inclusive education.

Research and Evaluation

In contrast to the nations I've discussed, the United States has an infrastructure that supports the monitoring of SWDs' academic growth, evaluation of the efficacy of "inclusive programs," research and development of new programs, teacher education, and more. I'll briefly discuss what many in the United States have learned from evaluations of SWDs' school achievement and so-called inclusive programs and research on intensive instruction.

Evaluating SWDs' academic performance. For decades, a majority of SWDs in the U.S. has spent 80% or more of the school day in general classrooms, a partial reflection of a desire among stakeholders for greater inclusive education. And for just as long, educators, researchers, policymakers, and advocates have inquired about whether special needs children and youth are indeed benefiting from general education instruction. In response, the federal government has funded many nationwide and statewide evaluations of SWDs' academic achievement. Overall, the findings have been disappointing. The National Longitudinal Transition Study–2 (Wagner et al., 2003), for example, produced a representative snapshot of SWDs' academic achievement in high school. Those with learning disabilities were on average 3.4 years behind grade level in reading; 3.2 years behind in math. The Special Education Elementary Longitudinal Study (Schiller et al., 2008) showed that 64 percent of the nation's elementary–age children with learning disabilities scored below the 21st percentile in reading comprehension.

Hilary Mirowitz, Jenny Gilbert, and I recently published an analysis of a different kind. We explored a belief held by many full inclusion adherents that the more time SWD are in general classrooms the better they do academically. We assembled a nationwide database spanning 1998-2015. For 9 of these years, we found placement data (from the Office of Special Education Programs) and National Assessment of Education Progress reading data (from the National Center for Education Statistics). We ran multilevel growth models to describe trends across time for both the placement data and reading data and found a steadily increasing trend for general class placement and a positive but decelerating trend for reading performance, which together produced a widening placement-performance gap after 2007. In short, we found little corroboration of the popular belief that the more time SWDs spend in mainstream classes, the stronger their school achievement becomes (Fuchs et al., 2023).

Evaluating effects of "inclusion" programs. Many in the U.S. claim that general educators have the necessary "arsenal"—instructional programs, curricula, and materials, and access to professional development—to successfully accommodate all SWDs in mainstream classrooms. . .if they make use of the available resources. MTSS is often mentioned as an effective means toward that end (e.g., Taylor & Sailor, 2024). In 2010, the National Center for Education Evaluation (U.S. Department of Education) awarded MDRC a multi-million-dollar contract to conduct the first and only nationwide evaluation of MTSS (see Balu et al., 2015). MDRC's team identified 146 "impact schools" in 13 states that, they claimed, were exemplary because the schools had conducted relatively complete versions of MTSS for at least 3 years.

MDRC's Balu and her colleagues (2015) conducted a regression-discontinuity analysis of first-, second-, and third-grade at-risk students in these schools and reported that MTSS had a *negative* effect on first graders' reading achievement, no effect on the at-risk children's reading at second and third grade. Lynn Fuchs and I (Fuchs & Fuchs, 2017) explained why we believe this evaluation was poorly designed, and how the faulty design undermined many of its findings and conclusions. Nevertheless, the evaluation also provided a detailed description of MTSS implementation in the 146 schools, a rich account of practitioners' struggles to implement this complex approach to service delivery.

Development of intensive interventions. In the past 20 years, the amount and variety of research involving SWDs greatly exceeds what can be discussed here. However, there is a particularly relevant line of research worth mentioning. The Institute of Education Sciences (IES) in the U.S. Department of Education and the National Institute of Child Health and Human Development in the National Institutes of Health invested millions of dollars in the development of academic programs to accelerate the very low achievement of K-12 students with severe learning problems. These federal agencies required grant recipients to develop and evaluate their programs using randomized controlled trials. A result of this rigorous work has been the creation of scores of intensive efficacious instructional programs and curricula (e.g., Wanzek et al., 2018), many of which have been disseminated by the What Works Clearinghouse (funded by IES) and the National Center on Intensive Intervention (funded by the Office of Special Education Programs). Some proponents of full inclusion regard these programs as violating principles of inclusive education, despite their demonstrated effectiveness, because many of them involve one-to-one tutorials or small-group instruction outside the general classroom. One might be excused for considering this ironic because agency funding has been partly motivated by recognition of general education's failure to provide an appropriate education to children and youth with serious learning problems.

Summary. So, what does such research and evaluation say about inclusive education in America? A truthful answer begins by acknowledging that the Constitution grants states a primary role in the education of its students. Because states differ from each other on many dimensions, including their respective views on the proper role and reach of government, generalizations can be misleading. That said, America's research and evaluation during the past several decades, sponsored by the federal government and many state governments, should be seen as part of a strong and sustained effort to include SWDs in the mainstream and to improve the quality of their education. Such effort reflects a broader commitment to equity and justice—not only admirable objectives but practically important ones because they have produced programs and strategies that have strengthened the capacity of classrooms to accommodate a greater range of academic diversity. One such practice is peer-mediated instruction, operationalized by different research groups as cooperative learning (e.g., Slavin et al., 1988), Class-Wide Peer Tutoring (e.g., Delquadri et al., 1986), and Peer-Assisted Learning Strategies (e.g., Fuchs & Fuchs, 2005; Saenz et al., 2005).

At the same time, millions of SWDs across America are failing in general classrooms and "inclusive" programs like MTSS have not helped. These are not opinions; they are facts. And the two facts together indicate that educators need more placement options than full-time enrollment in a regular classroom to improve the quality of all SWDs' education. Underscoring this view are the randomized controlled studies of intensive interventions conducted outside general classrooms that have been shown to accelerate many SWDs' school achievement.

None of this should be interpreted as an indictment of general education or general educators. I have great respect for the work of many teachers I've known, both as an elementary school teacher myself and as a school-based researcher who has worked in hundreds of Tennessee schools for 40 years. For more than half a century, research by others has documented that classroom teachers have a generally positive view of including SWDs in their classes—in principle. In practice, many have expressed concern that they lack the necessary training, resources, and supports to successfully teach them (e.g., DeMatthews et al., 2024; Scruggs & Mastropieri, 1996).

Proof of the Pudding

There is a 14th century proverb that goes, "the proof of the pudding is in the eating." It means you can claim something a success only after it has been tried or used. Full inclusion adherents might heed the admonition. Their support of full inclusion as the only acceptable definition of inclusive education reflects a *deductive* approach to service delivery: Start with the conclusion that all students belong in general classrooms full-time. Then work backwards to prove it

works. By now, numerous stakeholders understand that full inclusion has failed many SWDs. The proof-of-the-pudding approach is *inductive*: Start with an operational definition of inclusion and test its effects. If it falls short of objectives, modify it, test it again, and continue this process until a version produces the desired outcome. An inductive approach is less constrained by *a priori* dictates; more open to or accommodating of other means to a desired end.

It is past time for all stakeholders in America (and elsewhere in the world?) to get past the belief that there is only one permissible, righteous, constructive approach to inclusive education.

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