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CRITICAL ISSUES IN SPECIAL EDUCATION

Access, Diversity, and Accountability

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TRENDS IN PLACEMENT ISSUES

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Debates over the appropriate placement of students with disabilities, from placing them in the general education classroom to placing them in institutionalized settings, are informed by arguments about justice and individual education, and about special education in schooling more generally. Those further interested in this topic can read the many analyses written by special educators over the past fifteen years (e.g., Baker & Zigmond, 1990; Braten, Kauffman, Braten, Polsgrove, & Nelson, 1988; Carnine & Kameenui, 1990; Ferguson, 1995; Fuchs & Fuchs, 1991, 1994, 1995, 1998; Gartner & Lipsky, 1987; Gerber, 1988; Hallahan, Kauffman, Lloyd, & McKinney, 1988; Kauffman, 1989, 1992; Kavale & Forness, 2000; Kozleski & Jackson, 1993; Lipsky & Gartner, 1989, 1991; Reynolds, Wang, & Walberg, 1987; Roach, 1995; Roberts & Mather, 1995; Snell & Drake, 1994; Stainback & Stainback, 1992; Taylor, 1988, 1995; Wang & Walberg, 1988; Zigmond & Baker, 1994; Zigmond, Jenkins, Fuchs, Deno, Fuchs, Baker, Jenkins, & Coutinho, 1995). This chapter, rather than focusing on policy arguments or analyzing the debate itself, gives a broad overview of issues. This overview includes three separate topics: legal issues, psychological research, and social science perspectives on placement in special education for students with disabilities.

LEGAL ISSUES IN PLACEMENT

Judicial Restraint and Placement

Public school systems have enormous power in determining the placement of students with disabilities, as long as they can document that they have provided appropriate educational opportunities. In a court of law, if a public school system can document that it has done everything that is professionally appropriate to include students with disabilities in an appropriate environment as close to peers as possible, the court will generally *not* side with parents in a

dispute. This perspective does not reflect anything having to do with justice, but rather it is a statement of realistic court expectations for public school systems. By contrast, public school systems are far more likely to lose court cases where they are unable to document that they have taken appropriate steps to attempt to include students with disabilities in an environment close to peers. In other words, as long as public school systems can document that they have been professional and have taken all appropriate steps that research suggests, they are usually protected from arguments about appropriate placement for students with disabilities, as well as from arguments about the appropriate education of individuals with disabilities (Yell, 1995; Yell & Drasgow, 1999, 2000).

This judicial restraint has its origins in the often ambiguous language in federal law and regulations that implement the Individuals with Disabilities Education Act (Education for All Handicapped Children Act, 1975; IDEA, 1997). Federal law recognizes neither the term *mainstreaming* nor the term *inclusion*. The term *least restrictive environment*, which education inherited from earlier legal language on residential institutions, is rather confusing because it refers not to absolute placement criteria but to a nebulous statement that "to the maximum extent appropriate, children with disabilities . . . are educated with children who are nondisabled" (34 CFR §300.550 (b)(1)). As occurs elsewhere in IDEA, this is a recursive definition because it assumes that one can easily identify what an appropriate education is and what the "maximum extent" of contact with nondisabled children is that is appropriate (Yell & Drasgow, 2000). The IDEA regulations, moreover, require a variety of steps in the individualized education program (IEP; see other chapters in this volume for more information). If a public school system follows these steps in a way that meets both the procedural and substantive standards of appropriate education, the public school system is relatively immune from legal challenges where placement is concerned. While federal law and regulations include substantive mandates, these rely on the procedural steps for resolution, for they describe steps for decision making rather than hard-and-fast criteria for those decisions. The one additional placement criteria that is relevant legally is whether or not a public school system has taken reasonable steps to attempt to include a student in the least restrictive environment—that is, as close to peers as is the "maximum extent appropriate."

Arguments about this interpretation are usually vivid, as is elsewhere true in special education. Those who would like to see the vast majority of students with disabilities in general education classrooms emphasize the general guidelines that children with disabilities belong in a general education environment, requiring positive justification of (and thus an implicit burden of proof for) any deviation from a general standard of full inclusion. Here, the IDEA regulations (based on 20 U.S.C. §1412(a)(5)) suggest that the burden of proof is on those who see separation as necessary, requiring "that special classes, separate schooling or other removal of children with disabilities from the regular educational environment occurs only if the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily" (34 CFR §300.550(b)(2)). Yet those who prefer to conserve what has been called the full continuum of services, from placement in general education classrooms to institutionalized settings, point to adjacent regulations requiring that "each public agency shall ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services" (34 CFR 300.551(a)). Such "conservationists" (see Fuchs & Fuchs, 1991) generally see no need for school systems to put students with disabilities in environments in which the school systems and parents may see impending failure or in which the

child has experienced failure in the past. Neither of these views, however, has been considered explicitly by courts, and what happens in a courtroom is very different from arguments about what is just or right. In practice, decisions at the main appellate level of the federal court system (circuit courts) have been quite consistent (*Daniel R. R. v. State Board of Education*, 1989; *Hartmann v. Loudoun County*, 1997; *Roncker v. Walter*, 1983; *Sacramento City Unified School District v. Rachel H.*, 1994) and demonstrate a single approach as described by Yell and Draggow (1999).

In order to understand how courts make decisions, one must realize that the federal courts are becoming generally reluctant to interfere in the traditional operating sphere of local school systems (e.g., Orfield, Eaton, & the Harvard Project on School Desegregation, 1996). IDEA is a very powerful tool for advocates for children with disabilities, but courts place relatively high barriers that plaintiffs (those bringing suit) must meet in order to demonstrate that the school system is incompetent in dealing with students with disabilities. Where school systems violate procedural rights of children with disabilities in their families, courts and hearing officers are usually willing to intervene. However, where the issue concerns appropriate education or other substantive educational decisions, and where the procedural guidelines are moot, courts are usually reluctant to intervene. This is true in a wide variety of areas in educational law, not just in special education. Where a school system violates the normative assumption that it is both fair and professionally competent, administering hearing officers and courts are willing to question substantive decisions. Where that condition does not hold—where there are not obvious snafus or legal evasions by a school system—school systems are much more likely to prevail in court. Courts thus maintain a great deal of judicial restraint in dealing with special education. That is, courts are reluctant to replace professional educational judgment with judicial judgment. Courts intervene in a variety of matters primarily where they conclude that the school system is demonstrably incompetent. This is true in placement issues as well as in other areas of special education law.

The “Stay-Put” Provision, Amended

When Congress wrote the Education of All Handicapped Children Act in 1975, it created a provision to encourage collaborative decision making among school officials and the families of children with disabilities. Congress decided that in a case where there was no clear agreement about what should happen with a student’s IEP, the child should stay put in the existing arrangement. This “stay-put” provision was intended to encourage collaborative decision making and, in cases of disagreement, protect the due process rights of children who otherwise might be stampeded by school systems into inappropriate placements. The history of schools’ arbitrarily placing a large number of children in separate classrooms before the enactment of the federal law was probably the key reason for the provision. This stay-put provision restricted one option for the discipline of children with disabilities when the Supreme Court decided that suspension of more than ten days constitutes a change of placement under the law (Hartwig & Ruesch, 2000; *Honig v. Doe*, 1988; Yell, 1989; Yell & Shriner, 1998). Suspending the child for more than two weeks without the agreement of parents or guardians constituted a decision that required an IEP conference and, therefore, fell under the stay-put provision. In other words, any action of the child related to the child’s disability could not provoke more than ten days of suspension during a year without either parent/guardian agreement or a due process hearing the school system called. The enforcement of the stay-put

provision provoked a bureaucratic response from school systems. Schools created, with the consent and advice of the Federal Department of Education, an administrative process to determine whether or not the disciplinary incident was a manifestation of the child's disability. These manifestation hearings were a way to manage the discipline of a student and separate out, at least theoretically, that discipline that was connected to the child's disability and those discipline decisions that were not connected to the child's disability (e.g., *Letter to Bogrus*, 1993).

The problem with such manifestation hearings, in practice, has been that making such distinctions is spitting legal hairs. Is a child with learning disabilities acting out because the child is undisciplined or because she or he is highly frustrated with the problems of learning a difficult skill? Parents and guardians have an incentive, with such hearings and with the recent move to "zero tolerance" school policies, to insist that virtually everything a child does is tied to the disability (or disabilities), while school officials are motivated to explain that virtually nothing is a manifestation of a disability. In this particular adversarial setting, the common obligation to solve problems is often lost. In part because of school responses that focus on manifestation hearings, what has been largely absent has been a discussion of what positive steps schools and families can take together to teach children to behave more appropriately. The suspension of a child (and the taking of other disciplinary actions that remove a child from instruction) is noneducational because the child is not receiving instruction at all. Certainly, researchers and ethical educators who work with children whose behaviors are problematic (especially those children labeled with emotional and behavior disorders) have consistently argued that the best practices for children with disabilities involve teaching better behavior. Functional behavioral assessments have long been a recommended practice, despite the legalistic focus on manifestation hearings (e.g., Hartwig & Ruesch, 2000).

Regardless of professionally recommended practices, the debate during the mid-1990s focused on what changes, if any, would an amended IDEA include that might change the stay-put provision and the disciplining of children with disabilities. Administrators wanted the freedom to remove children from existing settings based on relatively minimal evidentiary standards (the suspicion of future misconduct), a proposal that many advocates for children with disabilities fought (Alpert, 1996). The compromise provision that Congress finally enacted allows school systems, when students bring weapons to school or are engaged in drug selling in school or on school grounds, to remove those children from the existing placement approved in the students' IEPs into a more restrictive setting (as an interim placement) for forty-five days. A school may also petition a hearing officer for a forty-five-day interim placement if it can demonstrate with significant evidence (more than a preponderance) that the student is likely to injure self or others. Balancing this provision, as least theoretically, is the requirement that IEPs include behavioral components where appropriate (including positive behavior interventions) and for problem solving to include functional behavioral assessment. Codified in law is the requirement for manifestation hearings at various points. In practice, the 1997 IDEA amendments regarding discipline have been in place for too short a time to gauge their impact. What is notable, from a political perspective, is that Congress did not respond to a debate over the prior ten years regarding full inclusion or inclusion more generally, but only in the area of students who were discipline problems. Most of the battles about full inclusion were rhetorical and concerned the courts. Congress left intact legal language from the prior versions of the law. Where the education of students with disabilities appears to affect schools

in general (such as in school safety or funding), legislators were more likely to focus on calls for change.

PSYCHOLOGICAL ISSUES IN THE PLACEMENT OF CHILDREN WITH DISABILITIES

In addition to understanding the legal guidelines regarding placement, educators should understand the psychological debates over appropriate placement. Much of the debate regarding the best setting for children with disabilities revolves around the priorities that one sets for schools (are they primarily for learning specific skills and knowledge or for socialization, for example). These debates also concern very concrete issues regarding the settings in which children can engage in various activities and the settings in which education can best happen. Much of the debate centers on the following four questions:

1. Where can the learning of specific or general skills (academic, behavioral, or otherwise) best happen?
2. In which settings do children feel the best about themselves?
3. In which settings can children with and without disabilities best learn how to interact, as children and as citizens of a democratic republic?
4. In which settings do the current skills of teachers best fit the needs of children with disabilities for the goals as stated in various questions above, and how are teachers' skills developed for different settings?

Those questions, of course, interact. For example, if children who need to learn behavioral skills can only be with teachers who can teach the skills effectively in a certain setting, then the placement issues for that child should concern the behavioral issues. On the other hand, if children can perform reasonably well in a general education setting with minimal interventions, or if the general education teacher has skills at least equal to the skills of special education teachers in that school, then a child is as likely to succeed in the general education environment as elsewhere—and then other concerns such as socialization trump concerns over skills. The following sections describe some of the issues central to these questions.

Where to Learn Skills

Curricular Expectations. The choice of settings in which to learn various skills involves several factors, whether one is discussing core academic skills in the general curriculum, specific social or behavioral skills, or what Brown, Branston, Hamre-Nietupski, Pumpian, Certo, and Gruenewald (1979) have described as skills that are immediate and immediately useful. The first important consideration is the set of curricular expectations in a given environment—that is, what is possible for a child to learn in the environment, and what do teachers and fellow students expect the child to learn. (This discussion of explicit expectations is separate from issues of hidden curricula—e.g., Jackson, 1968—and what children may learn on their own.) One can rarely expect students to learn, in the general education environment, what the teacher does not explicitly set forth in academics, such as the format of

writing, reading comprehension skills, math, science, or history as part of a curriculum. Behavioral expectations, as well, are important, and such expectations can (and, one would hope, should) include explicit skills for children to learn. So, too, with social skills and other skills, depending on what an IEP contains. These considerations depend on individual goals and also the capacity of an environment and school. There are many resource teachers who have not had sufficiently high expectations for their students' academic goals, many general education teachers who have had low expectations for their students or have inadequately analyzed students' performance, and also teachers (both general education teachers and special education teachers) who have not understood their students' needs for specific social skills and goals (e.g., Farlow & Snell, 1989; Fuchs & Fuchs, 1985). All of these issues of expectations should connect to an IEP, and expectations must be expressed, through concrete goals and analysis of student performance, in order for the education to be appropriate.

Support Expectations. A second issue regarding expectations addresses the expected support available to children. Put simply, for a setting to be appropriate teachers must acknowledge the needs of children for scaffolding, modeling, reteaching, and other interventions. Work in transenvironmental programming and reintegration of children into less restrictive environments strongly suggests that explicit comparisons of expectations for students, including the expectations of support teachers, can be crucial in helping students move smoothly between environments (Anderson-Inman, 1981, 1986; Fuchs, Fuchs, & Fernstrom, 1992, 1993; Fuchs, Fuchs, Fernstrom, & Hohn, 1991; Shinn, Habedank, Rodden-Nord, & Kautsen, 1993; Shinn, Powell-Smith, & Good, 1996; Shinn, Powell-Smith, Good, & Baker, 1997). In many cases, general education teachers can provide support that they would not for most students, if explicitly expected and when assisted. In other cases, teachers may have neither the inclination nor the technical assistance to provide the best support for students, even with concerted efforts to boost general educators' capacity to accommodate students with disabilities (Baker & Zigmond, 1990; Zigmond & Baker, 1994; Zigmond, Jenkins, Fuchs, Deno, Fuchs, Baker, Jenkins, & Coutinho, 1995). In yet other cases, teachers in a variety of settings rely on a limited repertoire of accommodations instead of individualizing interventions for that child. Needless to say, this aspect of what students learn is closely tied to professional development for teachers, discussed later in this chapter.

Requirements of Specific Techniques. Some specific techniques and instructional goals may require that settings be in certain locales. For example, Brown, Schwarz, Udvari-Solter, and Kampschroer (1991; also see Brown, Nisbet, Ford, Sweet, Shiraga, York, & Loomis, 1983) pointed out that for children with developmental disabilities, where one sometimes cannot expect generalization, the school itself is an insufficient environment and an inappropriate place to learn skills such as crossing a street or interacting in a store, where proximal location is crucial to mastery. One cannot learn how to cross a street safely within a school building. Teaching in the standard academic curriculum also may require unusual levels of intervention for students with disabilities. Mastropieri, Scruggs, and Butcher (1997) presented evidence that many students with disabilities may be unable to deduce scientific principles from observation without coaching. Such coaching can often occur in general education classrooms, but some specific techniques (especially those that benefit from individualization, such as coaching individual students on their *individually best* cognitive strategies) may need teachers in one-on-one instructional settings to maximize learning. More generally, a quiet environment is a requirement for many techniques that require one-on-one instruction.

The considerations above do not either rule in or rule out any specific setting for an individual child. Many of these issues are flexible insofar as the specifics are concerned. In some schools, general education teachers have appropriate expectations, effectively use interventions with individual children, and have the approval of other staff as they devote resources and time to serving the needs of individuals with disabilities in the general education environment. We certainly wish there were more such teachers and schools! However, we and many parents know that those situations depend on local circumstances that can change with teacher and administrative turnover. The general education environment is appropriate for teaching skills where teachers have the necessary skills, resources, and assistance, and where principals support the endeavors. Such teachers do not exist everywhere.

Where to Feel Better

One set of arguments over the appropriate placement of children with disabilities centers on what children perceive about their environment and specifically what children with disabilities understand about where they are during the school day. Certainly, much writing in educational psychology has focused on children's perceptions of general policies. Shepard and Smith (1989) make the vivid point that kindergarten students who are retained understand that they are "flunking," and euphemisms (such as "retention") do not hide that fact. The work of Coles (e.g., 1967) makes clear that children have a sense of morals and ethics and understand their environment in those terms. Those working with special education and what children with disabilities perceive have used Goffman's (1963) description of social stigma or similar concepts to argue, in some cases, that the placement of children in more restrictive environments has a stigmatizing effect (e.g., Snell & Drake, 1994; Stainback & Stainback, 1992). Certainly, the feelings that children have about themselves will affect their development and can either interfere or facilitate the learning of skills and maturation. However, the exact effect of setting on children's feelings about themselves and their environment is an empirical question, and the answers are not settled. In many cases, children may certainly perceive their being separated from the general education environment as a stigma. On the other hand, children may themselves be very aware of their problems and their history of failure in school. In those cases, children may well prefer a setting in which they can succeed to one in which they perceive as having inappropriate risks for themselves (e.g., Gresham, Evans, & Elliott, 1988; Jenkins & Heinen, 1989; Vaughn, Schumm, Klingner, & Saumall, 1995). The mix of resilience and risk avoidance is an individual matter, and the effect of setting on individual perceptions will vary.

Where to Socialize

Schooling has historically included a role for the socialization of children becoming adults in a broad sense. By *socialization* we mean not only the common meaning of learning social skills but also the learning of various roles in a society, such as being a voter in a republic. Many argue that this socialization in any formal organization has had evil consequences for children—for example, Goodman (1964) and Illich (1971) argue that children should not be in formal schools to socialize them for conformity. Bowles and Gintis (1976) make a similar point about schools' being a place to socialize children into the larger economic social structure. On the other hand, some have argued that schools can serve a positive role in socializing children, in antiracist education (e.g., May, 1999), in developing human capital (Becker,

1993), and for citizenship more generally (*Brown v. Board of Education*, 1954; Gutmann, 1987; Meier, 1995). Contact with children of diverse backgrounds, including with and without disabilities, serves to promote the broader social goals, according to advocates of full inclusion (Gartner & Lipsky, 1987; Lipsky & Gartner, 1989). In addition, most special educators, we would argue, see that as a useful goal in general (e.g., Fuchs & Fuchs, 1998). We agree with this general goal of contact among children with and without disabilities.

However, proponents of full inclusion have made a provocative comparison between the separation of children with disabilities from the general environment and the historical segregation based on race (e.g., Gartner & Lipsky, 1987; Stainback & Stainback, 1987; Wang & Waiberg, 1988). This argument places a greater burden on schools than they have been able to carry. The Supreme Court, in *Brown v. Board of Education*, concluded that legal segregation placed a stigma on African American schoolchildren that was an intangible inequality rooted in segregation itself rather than just the tangible inequalities that were obvious (such as unequal access to books). Many have interpreted the *Brown v. Board of Education* decision as a broad ethical mandate for a diverse student population. The argument of many proponents of full inclusion, for example, focuses on the philosophical and democratic principles that, they claim, exert an automatic and unimpeachable demand for the inclusion of all children in the general education setting. There are two ways, however, in which that argument places an inappropriate burden on schools. First, there are political limits to the use of schools for reforming society. The nation has witnessed now a fifteen-year trend away from court-supervised desegregation, for reasons that include a limited taste for schools as instruments of social policy (Orfield et al., 1996). In some ways we wish this timidity did not exist, but it does, and it affects the willingness to serve children with disabilities in various settings as well as the political will to desegregate schools.

In addition to the political limits of schools as reform instruments, the complex nature of schools as organizations constrains their capacity for implementing dramatic reform. Teachers and principals are buffeted by a variety of demands on their time and energies, from high-stakes testing to concerns about school safety and the mandated curriculum. The needs of children with disabilities, even with the best of intentions, are too often lost in the shuffle (e.g., Zigmond et al., 1995). The unintended consequence can be a message to children that is the exact opposite of democratic access and the dignity of all people. We have observed several situations in schools where the inclusion of children with developmental disabilities in the general education environment has served neither to promote the socialization of skills nor, particularly, to encourage children without disabilities to see their peers with disabilities as dignified. These examples are unfortunate object lessons of the potential for unintended consequences. Specifically, we have seen general education classrooms where children with more involved disabilities were not participating fully in activities and were the targets of teachers' efforts to provide very *different* tasks in the same classroom (such as providing a set of plastic objects to manipulate and calling this "vocational therapy"), where teachers were not given assistance to deal with difficult behavioral problems, and thus where the children with disabilities became object lessons in how those with disabilities are distinctly different from everyone else and *incapable* of having common needs, feelings, and aspirations. These children served primarily as classroom mascots and problems, not peers.

We hope that readers, regardless of their disposition toward inclusion, will share our horror at these particular situations, which serve no one's interests well. The question, of course, is whether the existence of such circumstances should undermine faith in the use of

schools to inculcate democratic values in children. To what extent should we trust children to make the appropriate moral judgment when they are observing unusual behavior and teachers with insufficient skills or poor guidance? The full inclusion argument implies that we should not worry about the right balance between protecting children and providing the dignity of risk, either for individuals with disabilities or for the goal of socializing citizens of a country. Those who stand on the side of excluding children with severe disabilities from general education classrooms would also not focus on developing criteria for the right balance. As a result, we have no criteria for such a balance except the vague legal guidelines that currently exist.

We suggest a different standard for the level of contact among children necessary to promote democratic socialization, one focusing on a reasonable minimum threshold rather than the maximum desirable under the best circumstances. If we agree that complete isolation of different groups of students from each other is unwise in a democratic society, we should model the standard for contact on the *minimum* interaction adults must have to agree on common interests, to communicate, and to work together. This is consistent with Gutmann's (1987) standard for education—that it provide at least *minimally sufficient* education for citizenship. What is necessary for appropriate maintenance of neighborhood social networks is the ordinary discourse that would happen when people mingle on a frequent enough basis to recognize each other as members of a community. In some older communities (and those planned as part of the New Urbanism movement—e.g., Duane, Plater-Zyberk, & Speck, 2000; Kunstler, 1996), adults sit on their porches and converse with those walking down the street or invite others onto their porches. No one expects to live constantly with all of her or his neighbors, nor is that level of contact necessary for working together. This “acknowledged neighbor” or “welcoming porch” standard encompasses a variety of situations, from joint projects planned by teachers to reverse mainstreaming and full inclusion. We propose it here as an alternative standard rather than to illustrate every situation that might meet it. This standard is, we suspect, both more feasible and defensible in the long term than either relying on rigid standards such as full inclusion or ignoring the role that schools play as institutions in a democratic culture.

How to Improve Teachers' Skills in All Settings

Federal law (IDEA, 1997) requires that states and local school systems create systems of comprehensive professional development in order to build the skills of the school system in general and to provide appropriate education for individuals with disabilities. This legal and ethical obligation extends to general classroom teachers as well as to specialists. Building that capacity is important for several reasons, not only because three-quarters of students with disabilities spend time in general education classrooms (U.S. Department of Education, 2000) but also because special education historically has had to rely on regular classroom teachers (Dorn, 1999). For all of these reasons, we think that paying attention to the skills of general classroom teachers, in addition to the skills of specialists, is crucial to the successful education of students with disabilities. At the same time, we recognize that competing demands on school systems as organizations may impede the development of skills by general classroom teachers or, more crucially, their use under intense pressures. Weatherley (1979) described competing demands that led educators, as “street-level bureaucrats,” to make decisions based on limited resources. We see time and skills as two examples of such limited resources in today's relatively high-pressured environment for classroom teachers. When all but one state

has high-stakes testing every year, and when the president of the United States stated his desire to have annual testing in grades 3 through 8, we understand that one of the consequences may be a "triage effect" with many children, including children with disabilities (Dorn, 1998). Such an explicit triage is unethical and, we believe, illegal. However, there are more subtle effects of these competing demands for teacher time and skills. In many places, school systems devote extraordinary professional development resources to existing general education teachers who are concerned about high-stakes testing. Whether explicit test preparation or preparing teachers with skills in helping a classroom in general meets the needs, such efforts may often compete with developing the skills necessary to accommodate individuals with disabilities in general education classrooms. In some cases, state-level policies for professional development should encourage the focus on individual skills. For example, both New York and Florida now have rules that require professional development to focus on the needs of individual children. Florida's Department of Education, for example, will now require individual professional development plans to "be related to specific performance data for the students to whom the teacher is assigned" (School Community Professional Development Act, §231.600(4)(b)5.a; see also New York Commissioner of Education, 1999). Such a mandate should encourage professional development that focuses on the needs of students with disabilities. Whether this requirement filters down into practice at the district and school levels, however, is a matter of empirical speculation at the moment.

In addition to these concerns about the skills of general classroom teachers, one must acknowledge that teachers' skills, experience, and willingness to educate children with disabilities vary widely. We wish it were not so, but it is. The needs of individual children must be met in real schools, with the teachers already there, with all their skills and flaws as human beings. To make decisions in the placement of an individual child by ignoring those concrete specific situations, in the general hope that a placement is appropriate by fiat, may be unfair to the children involved. One must ask whether the blanket placement of children with disabilities based on general philosophical principles is different from placement based on the category of eligibility for special education services. Individualization of education includes, for practical purposes, individualization of placement.

SOCIAL SCIENCE PERSPECTIVES ON PLACEMENT ISSUES

In the last thirty years, many critics of special education practices have used social science perspectives to shed light on school practices. Since Mercer's (1973) work on the identification and placement of Southern California children with disabilities in so-called mentally retarded rooms, many have similarly focused on identifying the ways school systems work in placing students with disabilities. One can use social science perspectives to analyze all special education practices, but these perspectives are perhaps most interesting and useful for providing different questions about placement. We suggest two broad categories of social science perspectives, those focusing on internal organizational attributes and those looking at the external pressures on schools. One potential conclusion of an internal perspective is that the placement of children in various classrooms is a safety-valve function of special education. Placement thus serves as a way to lower expectations for children with disabilities (e.g., Johnson, 1969). A second "internal" perspective focuses on the organizational characteristics and public schools as a whole and sees placement decisions less as a scapegoat mechanism

for avoiding correcting the failures of public schools than as *part* of the repertoire by which public schools deal with problems. Placement decisions are thus pragmatic problem-solving decisions, whose broader consequences are largely unintended (e.g., Gerber & Semmel, 1984). Both conclusions, notably, assume that what happens *inside* schools determines how we interpret placement. In contrast, we think it is important to understand the placement of children with disabilities in the broader institutional behavior that places *all* children in schools. Children outside schools do not exhibit the type of age segregation, for example, that one sees in public schools. More generally, the placement of children in any particular situation is socially constructed. This latter perspective is the one we find most persuasive. In contrast with the arbitrary placement of children in schools, arguments over where children belong within that organizational structure seem awkward and incomplete.

Internal Perspectives

The debate over appropriate placement of students with disabilities *within* schools often focuses on questions of public schools as a set of systems and organizations. For example, Taylor (1988) examined the continuum of services schools provide to students; he claims they are an organizational attribute that traps individuals with disabilities inside a pernicious logic emphasizing more restrictive placement. This type of perspective, internal to schools and school systems, has had a number of consequences for the debate over mainstreaming and inclusion. The first consequence is a focus on comparison groups within schools. The "normalization" principle, popularized in the United States by Wolfensberger (1972), focused on the provocative concept (at the time) that individuals with disabilities should have experiences similar to their peers and have contact with peers in the environment of nondisabled peers. The internal perspective on placement of individuals with disabilities within school systems applies that concept to schools in a parallel manner suggesting that individuals with disabilities need to be with age mates in the general education classroom (e.g., Stainback & Stainback, 1992).

A second consequence of the internal perspectives is the advocacy tactic of maximizing outcomes within the organizational structure of schools. One certainly would hope that those interested in welfare and students with disabilities would try to maximize outcomes, but occasionally this leads to inconsistencies. For example, many advocates, including lawyers, who have argued for full inclusion of students with disabilities within the general education classroom have also represented or supported parents seeking public payment for private special education schools. This practice has become a broader public policy in one state. As of spring 2001 Florida has a statewide voucher program not only for children zoned for schools labeled failing but also for children with disabilities, and the more than one thousand children in the disability voucher program dwarfed the approximately fifty in the failing-schools voucher program during the 2000–2001 school year (Hegarty, 2001). Ironically, both public-school choice programs (such as the charter school movement) and the disabilities voucher program in Florida can promote school choice as a way of separating individuals with disabilities from the general classroom environment.

External Perspectives

In contrast to internal perspectives on placement issues, one can focus instead on the role of schools in society at large and see the placement issues in that context, looking at schools from the outside. A few consequences follow. First, the common system of age grading that exists in

the schools today, a system that has been the basis for comparison between students with disabilities and their same-age peers, is an institutional quirk (if often mirrored elsewhere in society, as Chudacoff, 1989, writes). Should this quirk be the basis for all comparisons among children? Instead, perhaps we should look at age-peer comparisons as something that requires a concrete justification. A *purpose-specific comparison* may certainly be based on grading age. For example, intervention in poor reading is appropriate when comparing one eight-year-old to other eight-year-olds because learning the general curriculum in school requires relatively high literacy skills (as measured by common texts used in middle and high schools—e.g., Kinder, Bursuck, & Epstein, 1992). Thus, intervention to promote literacy also promotes the general curriculum. At other times, however, the appropriate target need not be same-age peers. Students whom we may not expect to generalize skills need those skills taught in the location and with people where students need to perform adequately. Thus, the purpose-specific comparison may be the general adult population, or the hypothetical (target) same individual with skills, in the environment where using those skills is necessary and appropriate. The acculturation of children who are deaf illustrates a third way of applying the notion of a purpose-specific comparison. Those who defend deaf culture (e.g., Cohen, 1994; Lane, 1994) argue that acculturating children into that culture requires their having consistent contact with people of all ages who are deaf; thus, the purpose-specific peers is the realization that outside factors, including the ability and willingness of general educators to accommodate the needs of students with disabilities, influence schools greatly. For example, the nationalization of education debate, which has promoted the use of high-stakes tests, has created an environment that as discussed earlier, may be in the interests of students with disabilities (which we hope) could encourage the development of professional skills that focus on individual children (which we think would be logical). We understand, however, that little of the recent discussion about standardized tests or the latest reading statistics from the National Assessment of Educational Progress (Donahue, Finnegan, Lukus, Allen, & Campbell, 2001) has focused on students with disabilities, and we know that focusing on special education as a policy goal is a tricky political maneuver. Reforming schools in the interests of children with disabilities will require a broad coalition capable of influencing national debates. That fact is well recognized by those with different perspectives on placement of students with disabilities in schools, but we have rarely seen such a coalition with a broad impact on public policy, though individual politicians can occasionally raise concerns about issues (such as Senator Jim Jeffords's insistence in the spring of 2001 that the federal government fulfill its promise from 1975 of providing 40 percent of special education funding) (Miller, 2001; Reagan, 1995).

Finally, an external perspective requires us to recognize that schools are now in the midst of the greatest organizational shakeup in the last 150 years, and these changes—including the promotion of privatization, the charter school movement, the shrinking of businesses—may affect the debate over placement far more than the converse. The priority of those who would emphasize the inclusion of children in the general education environment, widely differentiated goals for children that are, ideally, achieved in the same place, may be at odds with the current movement that emphasizes universal goals in different places. During the fall 2000 term, the parent of one of our students chose to use one of these "different places" to benefit her child with a disability, even though she felt uncomfortable with privatization as public policy. During the semester, this mother withdrew her son from the public schools of west central

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Florida and started negotiating a place for him in a private school that focuses on children with learning disabilities and attention-deficit disorder. She explained that she was and had always been a supporter of public schools and was uncomfortable with the use of vouchers for her own child. However, she explained, she could not sacrifice her own child's interests for her own principles. For her, the goals that she had for her individual child were primary, and placement was a tool to serve these ends.

QUESTIONS FOR FURTHER DISCUSSION

1. What is the primary argument within special education over what the term *least restrictive agreement* means? How is the professional debate over the meaning of the term different from the judicial decision-making process?
2. Do you agree with the authors' concerns about the manifestation hearing process? Why or why not?
3. How do you think the new requirements for accountability in all of K-12 education (the federal No Child Left Behind Act or your own state's accountability policies) will interact with decisions on placement of students with disabilities?
4. Do you agree with the authors' suggestion of "purpose-specific comparisons" in deciding who the nondisabled peer population is for an individual student with a disability? Why or why not?

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