

Running Head: ACHIEVING INCLUSION

Achieving Inclusion: What Every Parent Should Know When Advocating for their Child

Julie Causton-Theoharis

Syracuse University

Christi Kasa-Hendrickson

University of Colorado

Key Words: Inclusion, Parent Involvement, and Advocacy

Abstract

All students can be educated within the context of the general education setting with appropriate supports. This article provides essential practices for parents who wish to have their children educated in the general education classroom. The goal of this article is to share specific strategies for working collaboratively with a school team to make inclusive education a reality.

Achieving Inclusion: What Every Parent Should Know When Advocating for their Child

The family's vision was clear, Nate would go to school in his neighborhood with the same friends with whom he ran through the sprinklers. Nate's family wanted him to learn to read, make friends, and love school. The IEP team supported this vision until Nate entered high school.

During Nate's transition meeting from middle to high school, the principal informed Nate's parents that he would now be attending the *life skills program*. This information shocked the family; why should Nate's placement be changed when he had done so well in the general education classroom? The principal responded by claiming that, "This is where students with Down syndrome are most successful, we focus on navigating the community, and learning functional skills...". Dissatisfied with these reasons, Nate's parents began to learn about how they could work with the IEP team to continue to support Nate's successful participation in the inclusive classroom.

Over a series of IEP meetings, the family carefully laid out their vision for Nate's high school education; his desire to attend college, and the successful modifications from his middle school years. The team was reluctant, but after several hours of discussion about the importance of Nate receiving his education in the general education classroom, they agreed to support Nate to be included. Nate is now a junior taking biology, creative writing, home economics, and world history alongside his peers.

It is significant to think about the alternate course Nate's education could have taken had his parents not been persistent in their efforts to advocate for Nate. Had Nate's family accepted the initial recommendation of the school Nate would not have had access to the general education curriculum. He would not have read *The Scarlet Letter* and been able to share his

thoughts on this with his friends. He would not have dissected a shark or learned to make a taco salad to serve to his classmates. He might not have learned to open his locker that is located in the junior hall. Nate would not have been able to enter the school through the same door as students without disabilities.

Within different states, school districts, and schools, parents success in achieving inclusion varies greatly, and some situations are more challenging than others. Some school districts, as well as individual schools, are far more committed to supporting inclusion. During IEP meetings, discussion of placement options among the team does not occur on an equal playing field. In this situation the school personnel hold the position of authority and claim expertise when discussing placement. Comments such as, “we know what is best”, “this is how we do it here” and “he is too disabled” are common. Many families, understandably, place trust in the school’s experience and agree to segregated placements only to become dissatisfied later when limited opportunities and low expectations become evident. This article will provide families with the key steps necessary to work collaboratively with their school district when advocating for inclusive placements.

As authors of this article, we have spent the majority of our professional careers working with students in inclusive settings and researching best practices in inclusive education (Causton-Theoharis, in press; Causton-Theoharis & Theoharis, 2008; Kasa-Hendrickson, 2005; Kasa-Hendrickson & Kluth, 2005). Both of us are licensed teachers and now professors who train teachers at separate universities. We are both parents of school-aged children, and work with parent information centers. We have each partnered with families who have successfully worked with their school systems and in opposition to their school district to achieve inclusion.

From our professional experience we believe that ALL students, with the appropriate supports, can and should have access to the general education curriculum and instruction for the majority of the school day. As it affords the opportunity for students to access a high quality education, alongside same age peers with access to all the social benefits that the general education classroom allows.

In this article, we will first define inclusion and the research behind it, then describe parental involvement. For the remainder of this article, our goal is to share specific strategies for working with your school team to make inclusive education a reality for your child. We finish this article with a discussion for parents who continue to face resistance from their school teams.

What is Inclusion?

In the past, when the term *special education* was used, a special place (a room, or school) came to mind. This notion is rapidly changing. Special education is no longer limited to a specific location. It has been established that all children—even children with autism, severe disabilities, and emotional or behavioral disabilities—learn best in classroom settings with their general education peers (Causton-Theoharis & Theoharis, 2008; Peterson & Hittie, 2002). The law has deemed that special education services are portable services that can be brought directly to individual children (cite Roncker here). When students with disabilities are educated primarily in general education settings, this is called *inclusive education*.

Many definitions of inclusion exist. We borrow from the work of Norman Kunc (1992) who defined inclusion as:

...the valuing of diversity within the human community. When inclusive education is fully embraced, we abandon the idea that children have to become “normal” in order to

contribute to the world...and in doing so, begin to realize the achievable goal of providing all children with an authentic sense of belonging (pp. 38-39).

Kunc (1992) goes on to describe that inclusion is not only a philosophy, but it is also a schedule where no student engages in “pull out” or alternative activities to the extent that disruptions in peer relationships do not occur. Inclusion is also a rich and engaging curriculum. It is a teaming process in which all staff work in coordination. Finally, it is a classroom climate that embraces diversity, fosters a sense of social responsibility, and supports positive relationships.

Does my child have to keep up with the class in order to be included? No. A common misperception about inclusion is that students must “keep up” or perform at grade level in their academic work. Students with disabilities are not required to perform at grade level to be included in the general education classroom. Through the use of modifications students can engage with the content in different ways, with different materials and supports than other students receive. For example, for a student who is reading at the 2nd grade level in High School English the teacher can simply change the format for how he receives written information. He can read material with a partner, or access it digitally, and can still engage with the discussion of the content alongside his peers. Reading at a different grade level is simply an issue of access to printed material, but engaging with the content is where meaningful learning occurs.

What does inclusion look like in the classroom? In Mrs. Procopio’s first grade class, instead of memorizing a printed list of spelling words each week, the students come to the rug and brainstorm a list of words based on a particular chunk. One week the spelling chunk was “ide”. The student-generated list of words included: hide, pride, slide, tide and ride, ideology, abide and confide. The students then selected words that would challenge them for the week. The students select the number of words they would be studying between 4 and 8. This allows for

easy differentiation both for students who might struggle with the content and those who need more challenge. To be truly inclusive, “[students] do not need to engage in the curriculum in the same way that students without disabilities do; and they do not need to practice the same skills that students without disabilities practice. Learners need not fulfill any prerequisites to participate in inclusive education.” (Kluth, Villa & Thousand, 2008 p. 4)

What Does Research Say about Inclusion?

Research in the field of special education has consistently shown the benefit of educating students with and without disabilities together (Baker, Wang and Wahlberg 1994; Fisher, Pumpian, & Sax, 2000; McDonnell, Thorson, Disher, Mathot-Buckner, 2001; Waldron and McLeskey, 1998). Both the IEP goals and academic learning in the general education curriculum are achieved at a greater rate than when students are educated in an inclusive classroom (Causton-Theoharis & Theoharis, 2008). Additionally, students with disabilities learn to negotiate social situations in inclusive classrooms.

Further, the inclusion of students with disabilities into the general education classroom strengthens the classroom as a whole. Research has shown that when students with disabilities are included teachers work to create strength based classrooms, increase students access to resources and technology, implement differentiation, and teach skills of collaboration and interdependence (Kasa-Hendrickson & Ashby, 2009). When students with disabilities are included not only does achievement rise, but learning opportunities are strengthened for all (Causton-Theoharis, Theoharis, Bull, Cosier, Demph-Aldrich, in press).

Despite evidence of positive outcomes for inclusive practices many students continue to receive their special education services in segregated special education classrooms where there is little evidence of success (Ainscow, 2005; Losen & Orfield, 2002). Rather than focusing on the

individual needs of the child and the family's vision, some schools and districts continue to follow an outdated model where disability labels, perceived intellectual levels, and physical needs drive educational placements. This leaves families in the position of "fighting to get their children into general education classrooms and inclusive environments." (Kluth, Villa & Thousand, 2008 p. 3)

Parental Involvement

We believe that parents should be meaningfully involved in the educational decisions made about their children. IDEA (2004) specifically discusses parent involvement in determining placement decisions. The most important provisions of this law are outlined below. (1) Each public agency must ensure that a parent of each child with a disability is a member of any group that makes decisions on the educational placement of the parent's child. (3) If neither parent can participate in a meeting in which a decision is to be made relating to the educational placement of their child, the public agency must use other methods to ensure their participation, including individual or conference telephone calls, or video conferencing. (20 U.S.C. 1414(e), 1415(b)(1))

In other words, parents are a legally necessary part of the team that makes decisions about where children are to be educated. Parents should not simply be informed of placement decisions. Furthermore, school teams cannot hold these meetings without parents being present, or participating.

Additionally, as part of the Individuals with Disabilities Education Act of 2004 (IDEA '04), the Office of Special Education Programs (OSEP) of the U.S. Department of Education has established a monitoring process to ensure that States and local districts meet the requirements of the law. There are indicators identified by OSEP under Part B of the IDEA. The states must then collect data from local school districts on their progress and report to OSEP indicating how the

local and statewide data collected on each of the indicators aligns with the strategies and goals outlined in their State Performance Plan (PEAK Parent Center, 2008).

Six Things Parents Can do to Help Achieve Inclusion

What follows is a list of strategies to try when advocating for inclusion. Within each school district school contexts differ and political climates vary, therefore some of these ideas will work and others will not--given the members of your child's educational team. However, this list can be a starting point for helping your child's educational team to include your child in the context of the general education classroom.

1) Articulate Your Vision

Initially, you should be very clear about what you want for your own child and carefully articulate that vision in writing. One family believes strongly that their daughter should be included. So together, they crafted the following vision statement.

Our ultimate vision for Andrea is that she is educated alongside her general education peers for the entire school day. We want her to be included in every aspect of schooling. This means she is with her peers for lunch, recess and special area classes, but more importantly, all academic subjects with the appropriate supports. We want her support services to be brought directly to her and delivered seamlessly in the general education class. We view Andrea as an important member of her school. Therefore, we want her to be engaged as an integral part of the classroom and school community at every turn.

After writing a family vision statement, your next step is to share it with your child's school team. You could email it to the team at the beginning of the year, read it aloud at an IEP meeting, send it to the school in a letter format or ask that it be included in the present level of performance section in your child's IEP.

2) Learn what is Happening

Look at the current IEP and learn just how much time your child is in the general education classroom. Legally, the IEP needs to state how much time each student is educated outside of the general education classroom, with a rationale. Some questions to ask your educational team are: (a) “How much time is my child spending with peers without disabilities?” (b) “How many hours/minutes a day is my student included in the classroom?” (c) “Is my child ever removed from the general education classroom because of his/her behavior, or sensory needs?” (d) “Can you show me the data taken on the amount of time my child is removed from the classroom.” Obtaining this information can help you identify potential improvements to the schedule.

3) Work With the Team

Start with strengths. You know your child the best. Making sure the IEP team learns about your child and remains focused on the strengths instead of areas of weakness can help ensure the type of educational placement you will want. Ask yourself, “What skills and strengths does my child have that will help her learn and develop social relationships?” “How can those strengths and skills be utilized to help my child learn in the classroom?” Some parents have put together a *strength and strategies* profile (Kluth & Diamon-Borowski, 2005) to help their team members see what is possible. See figure 1 for a sample strengths and strategies profile.

Focus on the whole child. Educators only see your child when s/he is at school, which often limits their perspective. It can be helpful to share other instances of inclusion- outside of school. One parent brought a five -minute video clip focused on how Sam is successful in everyday aspects of his life, despite being legally blind. Seeing this student play baseball and cook with the family helped the team recognize more possibilities. Another avenue for doing this

is to let the school know how your child is included in a summer camp, a religious group or an after school art club—this may help the team see this student in a different light.

Support the Team to Learn Best Practice

Share resources. Sometimes the school is willing but not prepared to support students in inclusive classrooms. Encouraging the team to gain experience by observing successful inclusive classrooms can help. Additionally, sharing articles, websites or films with the staff can help build the capacity of the team. See table 2 for a bulleted list of such resources. Requesting that the team receive professional development on the topic of inclusion can also be useful (See Individuals with Disabilities Education Act of 2004, § 300.704(b)(4)(i), (b)(4)(xi)). In the IEP, training for staff can be listed under support for school personnel. Lastly, as a parent, you can learn about the local experts on inclusion that may be able to provide your team with the necessary training to make this effort more successful.

Think about all services. It is common to see a student who is included for the majority of the day, but receives her/ his related services in a pull out model. Pulling students from the classroom can be quite detrimental to learning and social relationships. Instead of removing the student from general education classroom to work on speech and language goals, consider having the particular goal met during reading language arts time with the support of the speech teacher. Or, instead of having a student work on a goal like learning to tell time in a resource room, have the student be responsible for the class agenda or schedule.

4) Know the Law

The most important language in the law that you should know to support inclusive practices comes from the federal law governing special education (IDEA). The provisions for

inclusion are found under the section entitled Least Restrictive Environment or LRE, which we will now review for you.

Least Restrictive Environment (LRE). The term that is used in the IDEA to support inclusion is Least Restrictive Environment or LRE. This law stipulates that all students with disabilities have the legal right to be placed in LRE.

LRE means that, to the maximum extent appropriate, school districts must educate students with disabilities in the regular classroom with appropriate aids and supports, referred to as "supplementary aids and services," along with their nondisabled peers in the school they would attend if not disabled (IDEA, 2004).

Under LRE, the general education classroom is the first place to be considered for placing a student with a disability before more restrictive options are considered. And a child with a disability cannot be removed from a general education classroom merely to meet the needs of the school. 34C.F.R. 300.116 (b)(3)(e).

Supplementary aids and services. Supplementary aids and services that educators have successfully used include modifications to the regular class curriculum. Such as preferential seating, large print materials, peer tutors, graphic organizers, use of computers, taped lectures, reduced seat time, assistance of a teacher with special education training, training for the general education teacher, use of computer-assisted devices, a note-taker, communication device, or changes to materials. All these can be used to modify or adapt the general education curriculum or instruction.

By law, educators must utilize all of the possible supplementary aids and services before determining that a student needs to leave the general education classroom. What follows in table 3 is a guide of the legal cases in placement decision that favor inclusion. This table is designed to

provide some information about legal precedent in terms of inclusion, so you can learn more information as necessary.

5) Plan an Inclusive IEP

Parents are members of the IEP team and in this role are an integral part of the process to develop goals and share strategies that will support their child to reach those goals. Careful planning of your child's IEP meeting is essential when designing the services needed to support your child successfully. Take your time when planning for the IEP to outline goals you seek to achieve in the meeting and then take the steps necessary in achieving those goals.

Sharing and gathering resources. As required by the IDEA the school team must include the families' suggestions regarding the goals and the associated supports to achieve at the IEP meeting (see www.wrightslaw.com/idea/law/section1414.pdf). As Nate's family continued to plan for the IEP meeting they let Nate's teacher know that they would submit as their suggested goals to include in the IEP. They also brought a list of strategies that were most successful for Nate in previous years. In addition, they requested that the teacher provide them a draft of the IEP one week prior to the meeting.

Bring an ally. Parents often describe IEP meetings, including the discussion of placement, as very difficult and painful. Nate's father informed us that when he initially asked that his child be included in the general education classroom that it was "the most difficult thing I had ever asked for in my life." Families have found it to be very useful to have a friend or advocate sit next to them, take notes, share ideas, and help them process information. Be sure to choose someone to accompany you who is comfortable being there and can communicate effectively and who serves as a calm supportive presence for you during the meeting.

Stay focused on placement. When you are discussing your child's placement, you should keep the discussion focused on how the school can help your child to be successfully included. Some handy phrases to have on the tip of your tongue might include: "Our number one priority is that she remains with her same age peers." "Let's strategize about how that can happen in the general education classroom." "That service seems portable... let's plan for how it can be brought to my child." Or, "My child needs to be surrounded by other children who can model those skills." The underlying strategy above is to ask the team to work with you to figure out *how* to make inclusion work for your child. Inclusive placements have been successful for students with disabilities all over the country. Certainly more school districts can implement inclusive practices if they engage in the questions, "how can we make this work?" You may want to prepare responses to questions or comments that you anticipate may arise. In that way you may consult your notes and keep your comments productive and focused on the issue.

Help Write Inclusion Oriented Goals. A student's individual goals should be driven by the student's strengths and what the student and her/his family would like to accomplish over the course of the year. Goals should be individual and directed by the student's needs and should also assist in connecting the student to the general education curriculum and to their peers (IDEA, 20 U.S.C. 1414(d) 2004).

Key ideas to consider when writing IEP goals. When drafting your child's IEP goals be sure to consider how the goals can guide the team in working on academic and social skills in natural inclusive environments. Make sure the goals: 1) Use supports and curriculum that are age-appropriate; 2) Lead to meaningful outcomes for your child; 3) Support learning the general education curriculum with peers; 4) Occur in natural settings and times throughout the day. (For example, zipping practice can be done by taking a coat on and off before and after recess and

social skills can be practiced in cooperative groups while learning science.) The following IEP goals may help you think about your child's IEP goals.

- While participating in 12th grade biology, Sophie will be able to name and describe four big ideas from each unit of study, with 80% accuracy for each unit.
- While working in cooperative groups with 2-4 peers without disabilities, Noah will successfully take turns 4 out of 5 times.

Be Prepared to Problem Solve. When challenges arise, some educational teams ask misguided questions like, “Is inclusion working” or “The child is not succeeding, so isn't it time to remove the child?” The team should ask instead questions that lead to problem solving. These are questions such as, “How can we make this inclusive setting successful for this child at this time?” Addressing and resolving these kinds of challenges is central to the long-term success of an inclusive placement.

6) Celebrate Successes with the Team

A strong school family partnership is critical to the success of children, and celebrating that success together can only strengthen the partnership. Be sure to recognize the instances of progress no matter how small. One parent comes to her meetings with a bulleted list of school “successes” and she reads them off to begin each meeting. If a meeting turns negative, ask the team to refocus on keeping things child-centered, positive and productive. Be sure to thank people for their efforts and to let them know they are appreciated.

When Your School Team Remains Resistant

Disagreements about LRE placement can be a very difficult situation. As we stated above, the first goal is to work collaboratively with the school. If you feel you have tried all you can, and the district is still not willing to include, you may want to move ahead using different

strategies. As parents, you can try many informal methods to solve the disagreement (i.e., writing a letter, requesting a conference with the teacher, principal, special education director or superintendent). You may want to work together with other parents, or start a parent organization to bring a collective parent voice to the matter. However, at some point a more formal option may become necessary. Your next step might be to consider the dispute resolution options under IDEA. These steps are requesting mediation, filing a due process complaint, having a resolution meeting or state complaint. For more information about going further in the process, we would like to direct you to your local parent center <http://www.taalliance.org/>. Additionally, you may wish to request the presence of legal representation at some point in the process.

Conclusion

Inclusion isn't a practice that schools can choose to adopt or reject (Kluth, Villa, & Thousand, 2001). It is a legally supported, evidence based practice that continues to show positive outcomes for students with and without disabilities in schools. Where a child is educated is one of the most important educational decisions a team can make. Parents are an essential component of that team. We are hopeful that parents can utilize these ideas to articulate a clear vision, and work in collaboration with your school team to advocate for your child to successfully achieve meaningful inclusion.

References

- Ainscow, M. (2005). Developing inclusive education systems: What are the levers for change. *Journal of Educational Change*, 6(2) 109-124.
- Baker, E.T., Wang, M.C., & Walberg, H.J. (1994). The effects of inclusion on learning. *Educational Leadership*, 52(4), 33-35.
- Causton-Theoharis, J. (in press). The Golden Rule of Fading: Support Others as You Would Wish to Be Supported. *Teaching Exceptional Children*.
- Causton-Theoharis, J. & Theoharis, G. (2008). Creating Inclusive Schools for ALL Students. *The School Administrator*. September, 24-30.
- Causton-Theoharis, Theoharis, Bull, Cosier, Dempf – Aldrich (in press) Schools of Promise: A School District- University Partnership Centered on Inclusive School Reform *Remedial and Special Education*
- Fisher, D, Pumpian, I, & Sax, C. (1998). High School Students' attitudes about and recommendations for their peers with significant disabilities. *Journal of the Association of Persons with Severe Handicaps*, 23, 272-280.
- Giangreco, M.F. (2004). "The stairs didn't go anywhere!": A self-advocate's reflections on specialized services and their impact on people with disabilities. In M. Nind, J. Rix, K. Sheehy, & K. Simmons, K. (Eds.) (pp. 32-42).
- Hawthorne, N. (2008). *The Scarlet Letter*. New York: Brandywine Studio Press.
- Individuals with Disabilities Education Improvement Act of 2004, 20 U. S. C. § 1401 *et seq.* (2004). (reauthorization of the Individuals with Disabilities Education Act of 1990)
- Individuals with Disabilities Education Improvement Act of 2004, 20 U.S.C. § 1414(d) *et.*

- seq.* (2004). (reauthorization of the Individuals with Disabilities Education Act of 1990)
- Kasa-Hendrickson, C. & Kluth, P. (2005). "We have to start with inclusion and work it out as we go": Purposeful inclusion of non-verbal students with autism. *International Journal of Whole Schooling*, 2(1), 2-14.
- Kasa-Hendrickson, C. (2005). "There's no way this kid's retarded": Teachers' optimistic constructions of students' ability. *International Journal of Inclusive Education*, 9(1), 55-69.
- Kasa-Hendrickson, C., Ashby, C (2009). *Strength based classroom: How the presence of students with disabilities enhances the general education classroom*. Paper presented at the Ninth Annual Second City Conference on Disability Studies in Education, Syracuse, NY.
- Kasa-Hendrickson, Buswell, B. Harmon, J. (2009) *The IEP: A Tool for Realizing Possibilities. A Toolkit Developed for PEAK Parent Center*. Colorado Springs: PEAK Parent Center.
- Kluth, P., Villa, R., & Thousand, J. (2001, December/January). "Our school doesn't offer inclusion" and other legal blunders. *Educational Leadership*, 59, 24-27
- Kluth, P. & Diamon-Borowski, M. (2005). *Strengths and strategies: Assessing and sharing what matters*. Retrieved June 10, 2009, <http://www.paulakluth.com/articles/strengthstrateg.html>
- Losen, D. & Orfielf, G. (2002). *Racial inequity in special education*. Boston: Harvard Educational Publishing Group
- Kunc, Norman. (1992). *The Need to Belong: Rediscovering Maslow's Hierarchy of Needs*.

Published in: Villa, R., Thousand, J., Stainback, W. & Stainback, S. *Restructuring for Caring & Effective Education*. Baltimore: Paul Brookes.

McDonnell, J., Mathot-Bucker, C., Thorson, N. & Fister, S. (2001). Supporting the Inclusion of Students with Moderate and Severe Disabilities in Junior High School General Education Classes: The Effects of Classwide Peer Tutoring, Multi-Element Curriculum and Accommodations. *Education and Treatment of Children*, 24 (2), 141-160.

PEAK Parent Center (2008, Fall). Determination letter shows Colorado in need of intervention for special education in part B. *Speak Out*. 1, 6&7.

Peterson, M. & Hittie, M.M. (2003). *Inclusive teaching: Creating effective schools for all learners*. San Francisco: Allyn & Bacon.

Waldron, N. & McLeskey, J. (1998). The effects of an inclusive school program on Students with mild and severe learning disabilities. *Exceptional Children*, 64(2), 395-405.

Yell, M. Rogers, Lodge (1998) The legal history of special education: What a long, strange trip it has been! *Remedial and Special Education*, 19 (4) 219-228.

Table 1: Sample Strengths and Strategies Profile

Strengths, Gifts, Interests, and Talents for Jordon	Effective Strategies for Jordon
<ul style="list-style-type: none"> • Loves to read and is a good reader 	<ul style="list-style-type: none"> • Use text reading software or make sure that material is at reading level
<ul style="list-style-type: none"> • Great memory; remembers information about others after meeting them 	<ul style="list-style-type: none"> • Highlight key points on text using highlighter tape
<ul style="list-style-type: none"> • Knows a lot of information about cars 	
<ul style="list-style-type: none"> • Is very interested in all areas of science 	<ul style="list-style-type: none"> • Focus on Jordon learning big ideas in science and social studies
<ul style="list-style-type: none"> • Loves to travel & has traveled all over the U.S. 	<ul style="list-style-type: none"> • Use buddy notes in all classes
<ul style="list-style-type: none"> • Is skilled at basic internet searches 	<ul style="list-style-type: none"> • Color code notebook by subjects
<ul style="list-style-type: none"> • Enjoys working to help others 	<ul style="list-style-type: none"> • Dictate a story map prior to writing
<ul style="list-style-type: none"> • Loves school 	<ul style="list-style-type: none"> • Color code what will go 1st, 2nd, 3rd,
<ul style="list-style-type: none"> • Likes PE and other physical games 	<ul style="list-style-type: none"> • Use laptop and co-writer for all writing
<ul style="list-style-type: none"> • Enjoys swimming 	<ul style="list-style-type: none"> • Practice math skills while working in the school store
<ul style="list-style-type: none"> • Works well with a schedule 	<ul style="list-style-type: none"> • Use peer supports
<ul style="list-style-type: none"> • Interested in school clubs and sports 	<ul style="list-style-type: none"> • Teach in naturally occurring general education environments
<ul style="list-style-type: none"> • Is a good public speaker and presents at conferences 	<ul style="list-style-type: none"> • Have high expectations
<ul style="list-style-type: none"> • Has many creative ideas for writing 	
<ul style="list-style-type: none"> • Is interested in going to college 	

Adapted from “Strengths and Strategies: Assessing and Sharing what Matters” by Paula Kluth & Michelle Diamon-Borowski (see www.paulakluth.com).

Table 2

List of Useful Resources for Encouraging Inclusion

Type of Resource	Name of Resource
Films	Including Samuel Autism is A World Educating Peter
Books	Kluth, P. (2003). "You're going to love this kid": Teaching students with autism in the inclusive classroom. Baltimore: Brookes Udvari-Solner, A., & Kluth, P. (2008). Joyful learning: Active and collaborative learning in the inclusive classroom. Thousand Oaks, CA: Corwin Press Sapon-Shevin, M. <i>Widening the Circle: The Power of Inclusive Classrooms</i> . Boston, MA: Beacon Causton-Theoharis, J. (2009). <i>The Paraprofessional's Handbook for Effective Support in the Inclusive Classroom</i> . Baltimore, MD: Brookes.
Websites	www.paulakluth.com www.wrightslaw.com www.k8accesscenter.org http://inclusiveschools.org http://idea.ed.gov www.taalliance.org

www.nichcy.org

Articles

Kluth, P., Villa, R., & Thousand, J. (2001, December/January).

“Our school doesn’t offer inclusion” and other legal blunders.

Educational Leadership, 59, 24-27

Causton-Theoharis, J. & Theoharis, G. (2008). Creating Inclusive Schools for ALL Students. *The School Administrator*. September, 24-30.

Giangreco, M.F. (2004). "The stairs didn't go anywhere!": A self-advocate's reflections on specialized services and their impact on people with disabilities. In M. Nind, J. Rix, K. Sheehy, & K. Simmons, K. (Eds.) (pp. 32-42).

Table 3

Inclusion Related Court Cases

Name of Case	Description of Case
Brown v Board of Education (1954)	Established that education must be made available to all on equal terms. Separate but equal is inherently unequal. Advocates for people with disabilities transferred this concept of equal opportunity to students with disabilities
PARC v Pennsylvania (1972)	The <i>PARC</i> plaintiffs argued that children with mental retardation could benefit from educational programs, and that these experiences did not have to be academic and could involve other training. Furthermore, the <i>PARC</i> plaintiffs argued that since the state provided students without disabilities a free education, the state could not deny students with mental retardation this same right.
Roncker v Walter (1983)	This case challenged the assignment of students to disability specific programs and schools. The ruling favored inclusive, not segregated, placement and established a principle of portability. It is not enough for a district to simply claim that a segregated program is superior. In a case where the segregated facility is considered superior, the court should determine whether the services, which make the placement superior, could be feasibly provided in a nonsegregated setting (i.e., regular class). If they can, the placement in the segregated

	school would be inappropriate under the act (IDEA).
Daniel R.R. v State Board of Education (1989)	In the case of Daniel R. R. v. State Board of Education (1989) the court decided not to follow the Roncker test and developed its own test. First, the court must examine whether, with the use of supplementary aides and services the child could be included in the classroom. Next, if the child could not be included, the court asks whether the child was mainstreamed to maximum extent possible.
Sacramento Unified School District v. Rachel H (1992)	Sacramento Unified School District v. Rachel H. In this case, the courts developed a four-part test: 1) the educational benefits from the regular classroom; 2) the non-academic benefits of interaction between students with and without disabilities, 3) the impact of the student with disabilities on the teacher and other children in the classroom; and 4) the cost of supplementary aids and services required for mainstreaming the student”
Rafael Oberti v. Clementon School District (1992)	Judge ruled that the school had failed to provide a student with supports, resources, and appropriate training to be placed in the inclusive setting. Placed the burden of proof for compliance with the law’s inclusion requirements on the school district and state not the family. “Inclusion is a right, not a special privilege for a select few.” (Federal Judge)
