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**INCLUSION OF STUDENTS WITH DISABILITIES:
AN INTERNATIONAL PERSPECTIVE**

By

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A dissertation submitted in partial fulfillment of the requirements
for the degree of Doctor of Education
in the Department of Educational Research, Technology, and Leadership
in the College of Education
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ABSTRACT

The purpose of this study was to examine the inclusion of students worldwide. Because the language barrier would impede the gathering of the necessary research, this study was delimited to only those English-speaking countries such as the United Kingdom, Canada, Australia, New Zealand, and the United States.

The researcher examined many aspects of the education of students with disabilities in each country and how that attributed to the extent in which students with disabilities were being educated in the regular classroom. First, the researcher analyzed the legislation regarding students with disabilities, especially those directives that called for the Inclusion of them. Second, the researcher investigated the educational models used in each country to ascertain the placements available for the disabled, making special note of those that were more inclusive. Next, the researcher gathered data that examined the categorical system used to label, group, and educate the Special Education population. Finally, the researcher compared the extent to which the students with disabilities were educated in the regular classroom in each country by looking at the total proportion included as well as the

percentage included in each disability category. To make a comparison of the educational attainments of each country, the researcher utilized a study by the Organization for Economic Co-operation and Development that incorporated the students with disabilities in their international assessments.

Results revealed that the United States has a much more extensive legislation dedicated to the education of individuals with disabilities than does the United Kingdom, Canada, Australia, and New Zealand. As a result, the United States' placement models and categorical systems are just as complex. Data also confirmed that other countries are including their disabled population in a regular education classroom at a much higher rate than that of the United States. Finally, the international study found that the United States performed worse than all the other countries in the subject areas assessed: Reading, Math, and Science.

Recommendations for further research included the examination of teacher education programs world wide, comparison of provincial and territorial regions in Canada and Australia, and a comparison of graduation rates for those students with disabilities in inclusive settings and those in segregated settings.

This dissertation is dedicated to my most precious commodities: my children Andrew and Arielle. May you both one day reach the goals that you set out for yourselves.

That is my wish for you.

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in my heart, is the success of those that you have reared.
Mom and Dad, you can consider yourselves truly successful
in life because the achievements I have made are absolutely
due to the nurturing, encouragement, and love that you have
given me. Thank you!

"I DID IT!"

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No Child Left Behind Act of 2001. (2001). Retrieved September 13, 2004 from <http://www.ed.gov/policy/elsec/leg/esea02/index.html>

LIST OF ABBREVIATIONS

ACD	Association of Children with Disabilities
CEC	Council for Exceptional Children
CME	Council of Ministers of Education
DAC	Disabilities Association of Canada
DEST	Department of Education, Science, and Technology
DOE	Department of Education
EAHCA	Education of All Handicapped Children Act
FAPE	Free and Appropriate Education
FLDOE	Florida Department of Education
GCE	General Certificate of Education
GNVQ	General National Vocational Qualification
IDEA	Individuals with Disabilities Education Act
IEP	Individual Education Plan
IRPC	Identification, Placement, and Review Committee
LD	Learning Disability
LEA	Local Education Authority
NASEN	National Association for Special Educational Needs
NCES	National Coalition of Educational Statistics
NZQA	New Zealand Qualifications Authority
OECD	Organization for Economic Co-operation and Development
PISA	Program For International Assessment

SAFE Schools Are For Everyone
SEN Special Education Needs
TASH The Association for Persons with Severe Handicaps
USDOE United States Department of Education

CHAPTER I: INTRODUCTION

Background

In 1975, PL 94-142 (Education for All Handicapped Children Act, 88 Stat. 773) changed the manner in which students with disabilities are educated in the United States. It became legalized that children with disabilities should receive a free and appropriate education. This law sanctioned the education of close to a million children with special needs who otherwise would not have been educated. Prior to the law, it was common for many students with disabilities to be institutionalized where the educational needs of the students were not taken into consideration (CEC, 1993). One aspect of the law requires that students are to be educated in the least restrictive environment. This means that all effort must be made to place students in the regular classroom to the greatest extent possible. More recently, including students with disabilities in the regular classroom for all curriculum areas has become a widespread model. This placement, though sometimes varied in definition, is referred to as *Inclusion* (Unger, 1996).

School systems make a distinction between Inclusion and Full Inclusion (Pearl, 2004). Inclusion is where the Special Education services are rendered in the regular education classroom for the students with disabilities, but it also maintains that the continuum of placements are still necessary, most often for the severely and profoundly disabled population. Full Inclusion, on the other hand, is where all students, regardless of the severity of their condition, are educated in the regular classroom along with their non-disabled peers. In addition, they receive all of the necessary supports in that environment.

Supporters of the Inclusion Model theorize that because the school failed to provide their students with an appropriate education in the first place, it was considered necessary to pull them out and provide them with an education in a segregated classroom environment with only other students with disabilities (Lipsky & Gartner, 1998). By not accommodating the current environment to meet the needs of the student, the school was, in essence, more disabled than the student. Proponents of Inclusion also believe that certain disabilities would even become non-existent if, initially, the students had been skillfully taught in a regular classroom environment. As it stands, Inclusion is becoming increasingly popular in schools

worldwide and is even often driven by the legislative mandates established in each country.

Countries differ greatly in the specificity of their laws in establishing an appropriate education for students with disabilities and, especially, in detailing the inclusion of them in a regular classroom environment. The United States, for one, has very extensive and detailed laws regarding the education of students with disabilities as well as regulations that call for the education of them in the regular classroom to the greatest extent possible (IDEA Amendments of 1997, 111 Stat. 37). On the other hand, Australia only has a National Anti-Discrimination Civil Law. Although this law is used as a guideline to help establish the fair and equitable treatment of students with disabilities, its actual purpose was to make the workplace accessible to its disabled employees (Heubeck & Latimer, 2002).

Although there has been widespread movement to include students with disabilities in the regular classroom, other educational models are still in existence. Some other placements include special schools and resource rooms within a conventional school (Lipton, 1999). Most often, the severity of the disability directly affects the educational placement of that child. There is one exception

though: countries and their respective provinces or states that practice Inclusion in their schools. The Inclusion Model, by definition, does not use a student's disability to help determine where that child should be served, but instead looks at how that child will meet with success in the regular classroom environment.

The United Kingdom, Canada, Australia, New Zealand, and the United States will be researched to determine how their laws mandate the manner in which students with disabilities are educated and what, if any, decree has been established that sanctions Inclusion for them. Furthermore, the actual inclusion of students with disabilities in the regular education classroom will be analyzed and disaggregated by each disability category.

Theoretic Framework

This study is guided by Social Learning Theory, Situated Learning Theory, and the Social Identity Theory. Based on Vgotsky's Social Learning Theory (2005), social interaction plays a fundamental role in the development of cognition. The interpersonal experiences that the child gets are influential toward his/her cognitive functioning. Certainly, the social interaction that a child receives

when educated along with their non-disabled peers in the regular classroom is quite different than the interaction that they would get in a homogenous classroom of only students with other disabilities. According to Lave's Situated Learning Theory (2005), learning is a function of the activity, context and culture in which it occurs. The research will point out that the placement of students with disabilities (i.e. special school, resource room, regular classroom) has a direct effect on their academic achievement. Lastly, Reicher's Social Identity Theory (2005) maintains that people in a crowd assume the identity of the group that they are in. Therefore, disabled students educated in a regular classroom setting would succeed academically to meet the group standards. In addition, they would exhibit behavior that is the norm of the group. Research from the Review of Literature will show that the typical behavior displayed in a regular classroom is more conducive to learning than the behavior demonstrated in a special education setting. In summary, this study will be based on these three theories and will help determine the education model that is more beneficial for students with disabilities. Each placement is distinct in that the social peers differ significantly and the circumstances under which the child is taught vary enormously.

Statement of the Problem

Educating students with disabilities is not merely an issue with which the United States must deal, but an international challenge. The educational laws of each country stipulate the manner in which education will be provided to students with disabilities. The United Kingdom, Canada, Australia, New Zealand, and the United States all have laws sanctioning the education of students with disabilities; however, those laws differ greatly in its specificity toward the Inclusion of students with disabilities in the regular education classroom. Further investigation will be done to determine the legislation mandating the education of students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States and how that legislation dictates the Inclusion of students with disabilities.

Countries also differ greatly in the manner in which students with disabilities are categorized. Some countries, like the United States, have a very extensive categorization system whereas students are grouped and served in accordance with the characteristics that they display. It is further evident that within each disability

category, like mental retardation, many school districts in the United States also use sub categories that further group students by the level of their intellectual capacity. On the other hand, other countries have a much more straightforward system of classifying students with a disability in that they do not use disability categories, but instead just have a dual system whereas the only decision made is on whether the student has a disabling condition that needs further resources than the regular classroom can provide. Many countries are actually somewhere in-between those two extremes. The researcher will analyze the system of categorizing students with disabilities in the United Kingdom, Canada, Australia, and New Zealand.

In the United States, Inclusion has become a widespread model for serving students with disabilities. That model has been designed to follow the true intent of the law mandating the education of students with disabilities in the least restrictive environment (Andrews, 2002). Other countries also implement the Inclusion Model for students with disabilities; although, there are differences in the extent to which that model is being instituted across each disability category. This study will analyze how the United States and other countries educate

their disabled population and further examine how extensive their Inclusion Model is.

Research Questions

Five specific research questions were addressed in this study.

1. What are the legislative mandates concerning Inclusion of students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States?
2. What are the educational models of teaching students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States?
3. What is the difference in the reading, math, and science knowledge base for 15-year-old students in the United Kingdom, Canada, Australia, New Zealand, and the United States?
4. What is the system of categorizing students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States?

5. To what extent are students with disabilities educated in the regular classroom in the United Kingdom, Canada, Australia, New Zealand, and the United States?

Definitions

The following terms will be used in this study:

Inclusion-Educating students with disabilities in the regular classroom environment for all curriculum areas without any exceptional education support services (Unger, 1996).

Individualized Education Program (IEP)-A written statement for each child with a disability that is developed, reviewed, and revised in accordance with Section 614(d) of IDEA Amendments of 1997 (IDEA Amendments of 1997, 111 Stat. 37).

Least Restrictive Environment-The requirement that children with disabilities must be educated with children who are not disabled to the maximum extent appropriate, and that special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occur only when the nature of severity of the

disability of a child is such that education in the regular classes with the use of supplementary aids and services cannot be achieved satisfactorily (IDEA Amendments of 1997, 111 Stat. 37).

Local Education Authority (LEA)-Local government body responsible for providing education and for making statutory assessments and maintaining statements (Harris, 2004).

Mainstreaming-Students with disabilities in the regular classroom environment for some or even all curriculum areas. Students taught in this model receive exceptional education support services in the regular classroom setting (Kirk et. al., 1993).

Resource room-Educating students with disabilities in a classroom designed only for students with disabilities and educated by a special education teacher. Students are often only educated in this environment for less than 50% of the school day. This term is synonymous with pull-out services (Evan & Heeks, 1997).

Self-contained classroom-Educating students with disabilities on a full-time basis in a separate classroom designed only for students with exceptionalities. This term is used to describe students who attend the public school

but, because of their disability, spend no time in a regular classroom setting (Evan & Heeks, 1997).

Special Education-The education of students with disabilities in the public school system. This term is synonymous with exceptional education and exceptional student education (Kirk et. al., 1993).

Special school-Educating students with disabilities in a separate school designed only for students with disabilities. Students remain there for the entire school day (Kirk et. al., 1993).

Student with a disability-A school-age child with mental retardation, hearing impairments (including deafness), speech or language impairments, visual impairments (including blindness), emotional disturbance, orthopedic impairments, autism, traumatic brain injury, other health impairments, or specific learning disabilities, and who, by reason thereof, needs special education and related services (IDEA Amendments of 1997, 111 Stat. 37).

Students with a mild disability-Student whose needs can be met through minimal special education services. Most often, this is referring to students who have mild mental disabilities, learning disabilities, or have mild emotional disabilities (Kirk et. al., 1993).

The following disabilities were utilized in this study to make international comparisons. Definitions are in the order that they appear in the data comparison table and charts in Chapter 4. The definitions were derived directly from the National Coalition of Educational Statistics Website (<https://nces.ed.gov/programs/coe/2005/notes/n07.asp>)

Partially Sighted- impairment in vision that, even with correction, adversely affects a child's educational performance. Sometimes the classification is otherwise known as a visual impairment.

Blind-student has a visual acuity ranging from 6/60 (20/200) in the better eye after correction, to having no usable vision or field of vision reduced to an angle of 20 degrees

Partially Hearing-impairment in hearing, whether permanent or fluctuation, that adversely affects a child's educational performance. Sometimes the classification is otherwise known as a hearing impairment.

Deaf-student has a hearing loss of 71 decibels or more unaided in the better ear over the normal speech range that interferes with the use of oral language as the primary form of communication or has a cochlear implant preceded by a 71 decibel hearing loss unaided in the better ear.

Emotional/Behavioral Difficulties-A condition exhibiting one or more of the following characteristics over a long period of time to a marked degree that adversely affects a child's educational performance:

- 1) An inability to learn that cannot be explained by intellectual, sensory, or health factors.
- 2) An inability to build or maintain satisfactory interpersonal relationships with peers and teachers.
- 3) In appropriate types of behavior or feelings under normal circumstances.
- 4) A general pervasive mood of unhappiness or depression.
- 5) A tendency to develop physical symptoms or fears associated with personal or school problems.

Severe Mental Disability-has a standardized assessment that indicated functioning in the severe to profound range, has scores equivalent to the severe to profound levels on an adaptive behavior scale, and has severe delays in all or most areas of development

Moderate Mental Disability-has an IQ in the range of 30-50 as measured on an individual intelligence test and has an adaptive behavior score equivalent to the moderately delayed level on an adaptive behavior scale

Mild Mental Disability-has an IQ in the range of 50-75 as measured on an individual intelligence test and has an adaptive behavior score equivalent to the mildly delayed level on an adaptive behavior scale

Physical Disability-impairment that adversely affects a child's educational performance; impairments caused by congenital anomaly (e.g. clubfoot, absence or some member, etc.), impairments caused by disease (e.g. poliomyelitis, bone tuberculosis, etc.), and impairments from other causes (e.g. cerebral palsy, amputations, and fractures, or burns that cause contractures).

Multiple Disability-Concomitant impairments (such as mental retardation-blindness, mental retardation-orthopedic impairment, etc.), the combination of which causes such severe educational needs that they cannot be accommodated in special education programs solely for one of the impairments.

Learning Disability-A disorder in one or more of the basic psychological processes involved in understanding or in using language, spoke or written, which disorder may manifest itself in imperfect ability to listen, think, speak, read, write, spell, or do mathematical calculations. Such term includes conditions such as perceptual disabilities, brain injury, minimal brain dysfunction,

dyslexia, and developmental aphasia. Such term does not include a learning problem that is the result of visual, hearing, or motor disabilities, of mental retardation, of emotional disturbance, or of environmental, cultural, or economic disadvantage.

Speech and Language Disabilities-A communication disorder, such as stuttering, impaired articulation, a language impairment, or a voice impairment, that adversely affects a child's educational performance.

Other Health Impairments-Having limited strength, vitality, or alertness, including a heightened alertness to environmental stimuli, that results in limited alertness with respect to the educational environment, that

- Is due to chronic or acute health problems such as asthma, attention deficit disorder or attention deficit hyperactivity disorder, diabetes, epilepsy, a heart condition, hemophilia, lead poisoning, leukemia, nephritis, rheumatic fever, and sickle cell anemia; and
- Adversely affects a child's educational performance.

Autism-A developmental disability significantly affecting verbal and nonverbal communication and social interaction, generally evident before age 3, that adversely affects a child's educational performance. Other characteristics

often associated with autism are engagement in repetitive activities and stereotyped movements, resistance to environmental change or change in daily routines, and unusual responses to sensory experiences.

Since the United Kingdom has a non-categorical system of classifying the students, the following definitions are relevant for that country alone. They were derived directly from Special Educational Needs: a Guide for Parents (DfE, 2002).

Children with statements of special education needs-The statement of special educational needs is a legal document that sets out the child's needs and all the special help he or she should have, which may include money, staff time and special equipment. It also sets out the responsibility for these resources between the school, local authority and others agencies such as health and social services. The statement will also specify the educational placement of the child-whether in mainstream school, special school or other form of specialist provision.

Children with special educational needs without statements- Those students with special educational needs whose needs can be met through the resources of the regular school.

Delimitations of the Study

This study considered those countries that had formal education systems and recognized students with disabilities in their schools (i.e. Australia, China, Japan, Denmark, Sweden, Netherlands, the United Kingdom, New Zealand, and the United States). Because the language barrier would impede the gathering of the necessary research, this study is delimited to only those English-speaking countries such as the United States, Canada, the United Kingdom, Australia, and New Zealand.

Limitations

Although efforts were made to ensure that the term *disability* equates with the U.S. definition, this study is limited by the fact that the criteria for handicapped in other countries might not equate to that established throughout the U.S. In addition, this study is limited by the fact that there exists some divergence between the countries in the categorical definitions for each disability. Lastly, this study is limited by the prospect

that staffing students into the program for students with disabilities might differ throughout the selected countries.

This study is limited to the fact that countries differ in coursework required in secondary school education. This would therefore have an effect on the students' knowledge base of reading, math, and science in each country.

Significance of the Study

Most democratic countries have education systems that provide additional resources to students with disabilities. The question is whether or not those students are getting an equitable education in a learning environment that is as beneficial as the one provided for non-disabled students. Since the Inclusion Model provides the exact same learning environment for disabled and non-disabled students, there can be no disputing the fact that both populations have equal access to an education. The school systems of the United Kingdom, Canada, Australia, New Zealand, and the United States will be analyzed to ascertain the extent that they are educating their disabled population in the regular classroom along with their non-disabled peers.

Another important aspect of a public education system is that there exists an equitable achievement potential. All students educated in the system should have the same possibility of mastering the skills and qualifying for the degree to exit the system (i.e. diploma). According to the National Center for Educational Statistics (2005), students with disabilities who are educated in the regular classroom have a significantly higher chance of graduating with a regular diploma than those students that received their education secluded from their non-disabled peers. The Inclusion Model would therefore provide students with disabilities with a more equitable opportunity for future success.

In regards to students with disabilities, equitable does not always relate to an equal education as often times students with disabilities are provided with additional resources in the education system. It is significant to ascertain those countries that are including students with disabilities at a higher degree and actually discovering that in order to provide an equitable education to students with disabilities, the learning environment provided must remain equal.

CHAPTER II: REVIEW OF LITERATURE

Introduction

The review of literature closely examines the historical precedence set for students with disabilities as well as the means in which they are presently served in the educational system. Legislation is examined that deals with precedent-setting case law that impact students with disabilities. Furthermore, the current placement of students with disabilities is discussed as well as the research that explores different aspects of that educational placement. Finally, the review of literature discusses the legislation and placement of students with disabilities in the United Kingdom, Canada, Australia, and New Zealand.

United States Historical Overview of Legislation

The Individuals with Disabilities Education Act was launched as the Education for All Handicapped Children Act (PL 94-142) in 1975 (88 Stat. 773). This law required that a free appropriate education be provided to all qualifying

children with disabilities. Federal dollars were given to the states for this specific purpose. Prior to the passage of the initial law PL 94-142, more than one million children with disabilities were not being served by the public school system. Public Law 94-142 has been amended multiple times, but the foundation of the law has remained the same. It is simply that students with disabilities have an opportunity that they never had prior to 1975. This opportunity allows them to reach higher levels of achievement and learn the skills necessary to make them productive members of society.

Since the enactment of PL 94-142 in 1975, the Individuals with Disabilities Act has undergone several amendments. In 1983, it was amended as Public Law 98-199 (97 Stat. 1103). This amendment was significant because it changed the law to include programs for preschool children with special needs. Public Law 94-142 was further amended in 1986 (100 Stat. 1145). This amendment provided for the award of reasonable attorneys' fees and costs to parents who prevailed in legal actions against their school district for failing to provide a free, appropriate public education to their children. It also called for special education services to be provided to children with disabilities from birth to age 2. In 1990, the amendment

changed the language used to refer to children with disabilities (EHA Amendments of 1990, 104 Stat. 1103). A 'handicapped student' would now be referred to as a 'student with a disability.' Furthermore, it added traumatic brain injury and autism as separate and distinct classes that would be addressed based on the law. In 1991, there was yet another amendment to the law (IDEA Amendments of 1991, 105 Stat. 587). The biggest change in 1991 affected those students not currently identified as having special needs. It actually included services for students at risk of substantial developmental delays if intervention services were not provided. This included low-income, minority, rural, and other under served populations. Finally, in 1997 the Individuals with Disabilities Education Act was amended as Public Law 105-17 (111 Stat. 587). The importance of this law was that it placed an emphasis on the least restrictive environment which made it mandatory to include the disabled students in the regular classroom to the maximum extent possible. This was a necessary addition to the law because many students with special needs were being excluded from having contact with their regular education peers. Although services for them were being implemented, they were often in a separate area

of the school building without access to the mainstream population.

The expectation under the new law is that the child will participate in the regular classroom unless sufficient reason is demonstrated that such participation is not appropriate (Lipton, 1999). The law further requires that placement in the regular classroom may include supplementary aids and services (Yell & Drasgow, 1999). It is clear that Congress' preference is that all effort should be made to mainstream the students in the regular classroom. From the findings of PL 105-17, it was determined that this is the most effective placement for students with disabilities. The law not only stipulates that students with disabilities are required to participate in the regular classroom to the maximum extent possible, but they are also expected to take the standardized assessments unless a specific explanation, as stated in Section 614 of Part B of PL 105-17, has been given.

Least Restrictive Environment

There is an abundance of case law on the subject of the least restrictive environment. In the case of *Daniel R. R. v. State Board of Education* (1989), Daniel was a 6-year

old boy with Down's syndrome who needed constant individual attention from the teacher and failed to master any of the skills taught. His parents brought a case against the local school district because they alleged that their school district failed to comply with the Education of the Handicapped Act. They specifically indicated that the local district refused to place their child in a class with non-handicapped students. The Court ruled that the special education class was the appropriate placement for Daniel. They further declared that:

Even when school officials can mainstream the child, they need not provide for an exclusively mainstreamed environment; the Act requires school officials to mainstream each child only to the maximum extent appropriate. In short, the Act's mandate for a free appropriate public education qualifies and limits its mandate for education in the regular classroom. Schools must provide a free appropriate public education and must do so, to the maximum extent appropriate, in regular education classrooms. But, when education in a regular classroom cannot meet the handicapped child's unique needs, the presumption in favor of mainstreaming is overcome and the school need

not place the child in regular education. (Daniel R. R. v. State Board of Education, 1989)

Another case that establishes precedent with regard to the least restrictive environment is *Sacramento City Unified School District v. Rachel H.* (1994). The United States Court of Appeals for the 9th Circuit declared that four factors must be considered in determining least restrictive environment. They include:

- (1) the educational benefits of the regular classroom with supplementary aids and services balanced with the educational benefits of the special education classroom,
- (2) the nonacademic benefits of integration with students who are not disabled,
- (3) the effect of the student's presence on the educational environment and on other children in the classroom, and
- (4) the cost of including the student in the regular classroom.

(*Sacramento City Unified School District v. Rachel H.*, 1994)

Finally, the Court in *Hartman v. Loudoun County Board of Education* (1997) further made a ruling on the aspect of the least restrictive environment for students with disabilities. The Hartmann three-part test resulted from this case law. It established that mainstreaming is not required where:

- (1) the disabled child would not receive educational benefit from mainstreaming into a regular class
- (2) any marginal benefit from mainstreaming would be significantly outweighed by benefits which could feasibly be obtained only in a separate instructional setting
- (3) the disabled child is a disruptive force in the regular classroom setting.

(Hartmann v. Loudoun County Board of Education, 1997).

IDEA of 1997 Amendment Changes

The 1997 Amendments not only dealt with the least restrictive environment for children with disabilities, but they also changed the requirements for the suspension or

expulsion of them (Brown, 1998). Upon the 11th school day that the child has been removed, it will be required by the local school district to provide the student with the free and appropriate education (FAPE) that is specified on their Individual Education Plan (IEP). In other words, it will no longer be permissible to suspend or expel these students beyond 10 days without regard to their education. This law even stipulates that these same designations apply to children who are incarcerated in adult prisons who were known to be disabled prior to their incarceration. Furthermore, it is now mandated that strategies and interventions relating to that child's behavior must be included in the IEP (Schrag, 1997). Congress recognized the fact that students still need an education regardless of their maladaptive actions that might have occurred in school. It is hopeful that their education might help rehabilitate the students by providing them with the resources to gain successful employment after school. As prior law called for the removal of the child for up to 45 days for only bringing a gun to school, this current amendment determined that a child can be placed in an alternate setting for up to 45 days if the child is found possessing any weapon or illegal drugs (USDOE, 2003). This bill also allows a hearing officer instead of a court to

determine whether disabled students may be moved to another classroom or another school to prevent them from endangering themselves or others. Lastly, this amendment further enhances the manifestation determination by stating that if a behavior is not related to their disability, the child must be disciplined in the same manner as children without disabilities. On the other hand, if the behavior is found to be a manifestation of the child's disability, the child may not be punished for it. Instead, the behavior plan established in the IEP must serve to meet those behavior objectives (Lipton, 1999). Congress clearly saw the need to individualize how behavior is handled for students with disabilities. They found no reason to punish children if the behavior that they are exhibiting is due to their disability.

Inclusion of Students with Disabilities

There are a considerable number of placement alternatives for students in Special Education. Since the passing of PL 94-142, it was mandated to place each individual student in the least restrictive environment that would meet their needs. The Federal law (IDEA Amendments of 1997, 111 Stat. 37) mandated that the child

with the disability may be served in a separate environment only if the individualized instruction required by the child to make adequate academic progress cannot be provided in the regular classroom with appropriate special education services and supports. Despite the legal effort to ensure that students become more educated with their regular education peers, students today remain in settings that range from fully separated (i.e. special schools) to fully integrated (i.e. full inclusion) (Elbaum, 2002). Those students in the most restrictive placements spend the least amount of time with regular education peers, whereas those in the least restrictive environment spend most, if not all, of their time being educated with their regular education peers.

Inclusion is the most critical issue that we currently face in the education of students with disabilities. There is a discrepancy made in the terms Inclusion and Full Inclusion. Inclusion entails that disabled students, for the most part, are educated in the regular classroom along with their non-disabled peers, but it still considers that a continuum of placement services are necessary, especially for more severe disabling conditions (Pearl, 2004). The Council for Exceptional Children (CEC, 1993) advocates Inclusion in that it concurs that those students with

disabilities "should be served whenever possible in general education classrooms in inclusive neighborhood schools and community settings" (p. 1). The phrase 'whenever possible' leaves the door open for the option of serving students with disabilities in placements beside the regular education classroom. Full Inclusion, on the other hand, calls for the full-time placement of students with all disabilities in the regular classroom (Pearl, 2004). It rejects the notion that there is a continuum of placements rendered to those with disabilities and instead maintains that the most appropriate placement for all students is the regular education classroom (Pearl, 2004). Advocates for Full Inclusion include the Association for Persons with Severe Handicaps (TASH) and Schools are for Everyone (SAFE) (CEC, 1993).

Despite the debate between those who advocate for Inclusion and those that advocate for Full Inclusion, there is no disputing the fact that more and more students are being educated in the regular education classroom along with their non-disabled peers. The USDOE reported that there has been an 87.1% increase from 1990 to 1999 in students that were served in the regular classroom for the majority of their school day. Also, they reported that students with mild disabilities are more likely to be

served in the regular classroom. Andrews et. al. (2000) found out that a learning disability is the most common type of disability regularly served in the regular classroom.

There is an ongoing debate on whether inclusion is the most effective way to educate students with disabilities. Lipsky and Gartner (1998) not only felt like it was the most appropriate way to educate exceptional education students, but they felt that inclusion is the intent of the law: "IDEA consistently reinforces the expectation that a student with a disability will be educated in the general education environment" (p. 18). Of course, they felt that inclusion is only possible with certain action plans in place like a visionary leader, collaboration, support for staff and students, and parental involvement. A visionary leader is the one that makes believers out of teachers. In doing so, the teachers will have full confidence that they have the ability to teach these students and can do so with complete competency. King and Youngs (2003) found that teachers who voiced that they were committed to inclusion also tended to make accommodations to meet the students' needs. In addition, King & Youngs (2003) found that teachers were more likely to hold high expectations for exceptional education students in an inclusive setting.

Hallahan (2001) felt quite differently. He noted that if we placed the exceptional education students back in the regular classroom, we would be, in essence, going back in time. Those students would not be receiving the attention nor modified curriculum that they needed. He also felt that since they were staffed out in the first place because they weren't successful, it wouldn't be effective to place them back in.

The Challenges of Inclusion

Studies have been done on those students with special needs that examine the best possible placement according to social, academic, and character development. One of the highest regarded character traits studied has been on the self-concept of the students with special needs. This is probably because, according to Vaughn & Hogan (1990), self-concept is a necessary component of social and academic competence. Elbaum (2002) conducted a meta-analysis on the self-concept of students with learning disabilities across different placements. This meta-analysis contained 38 studies that compared the self-concept of students who received instruction in a less restrictive versus a more restrictive environment. In most of the placement

comparisons (3 out of 5) there was a significant association between self-esteem and educational placement as those students served in the regular classroom placement had a higher self-esteem than those students with disabilities served in other capacities. There was no significant difference in self-esteem for those students served in a resource room versus a self-contained class. Overall, the researcher asserted that there is a strong association between the self-concept of students and their placement in the regular classroom. Coleman (1983) also researched the self-concept of mildly handicapped pre-adolescents and found that higher self-esteem scores were found for those students being served in regular classroom settings as opposed to those being served in the resource or self-contained classroom.

A major aspect of self-esteem is one's confidence in their academic ability. According to Renick (1985), learning disabled students in both resource rooms and self-contained classrooms perceived themselves to be more academically competent in their special education classes than in regular classes. To break it down even more into grade specificity, Renick found that elementary students being served in resource rooms perceived themselves to be more academically competent than those middle school

students being served in the resource rooms. Then again, the research also suggests that middle school students being served in those resource rooms did have a better self-concept than those being served in the self-contained classrooms.

It is widely believed that acceptance from the peers of a disabled student will increase simply by placing that disabled student in an inclusion setting (Szivos, 1992). The Social Identity Theory, on the other hand, presumes that when someone is perceived to be a member of a particular group, they will be perceived in stereotypical terms (Hastings & Graham, 1995). Although integrated in the regular classroom, students with learning disabilities may still be negatively typecast by their peers. It was found that the type of school attended (integrated vs. non integrated) did not significantly change the attitude towards students with learning disabilities (Sandberg, 1982; Hastings & Graham, 1995). Hastings & Graham (1995) further looked into whether the frequency of contact had any effect on the emotional reactions of the non-disabled children. It was found that those children that had the most contact with students with learning disabilities also showed an increase in positive feelings about them. It was suggested that mere inclusion in the regular classroom would not be

the cure-all, but instead the opportunity for structured interactions would be the most successful way to improve the attitudes towards students with disabilities.

Another major focus that lends to the success of student achievement is proper teacher instruction. Algozzine and Morsink (1989) compared the instruction in self-contained special education classes with that in regular classrooms using 6 dimensions: questioning style, classroom climate, academic learning style, individualization, teaching style, and classroom management. It was found that the regular teachers excelled in their questioning style, classroom climate, and academic learning style while the special education teachers were favored in the area of individualization. There was no significant difference in teaching style and classroom management, but it was noted that special educators assisted students more often with error correction.

The academic needs of the students with disabilities are of utmost importance when making the decision about their educational placement. It is therefore necessary to ascertain the placement that will provide the student with the best possible opportunity for advancement. Segregated programs including those pull-out placements have the stigma of lower expectations, uninspiring and restricted

curriculum, disjointedness from the general education lessons, and negative student attitudes (Andrews et al., 2000). Carlson (1997) has also advocated that segregated students from a regular education classroom can lead to poor social, academic, and employment outcomes for students with disabilities. Rea et al. (2002) conducted an investigation in a small, suburban school district that compared the performance of middle school learning disabled students who were served in inclusive classrooms with similar students served in pull-out special education programs. The performance criteria included academic achievement, daily school attendance, and disciplinary infractions. It was found that students with learning disabilities who were served in inclusive classrooms earned significantly higher grades in all four areas of academic instruction: language arts, mathematics, science, and social studies. It was further found that on the Iowa Test of Basic Skills, students in inclusive education received higher scores on reading comprehension, language, and mathematics subtests, but there was no significant difference from inclusive education to pull-out services on the subtests for science and social studies. Furthermore, it was concluded that there was no significant difference between the two groups comparing in-school or out-of-school

suspensions. As for attendance, it was found that students in inclusive settings attended significantly more days of school than did students in pull-out special education programs. According to the study by Rea et al. (2002), the inclusive setting was definitely a more beneficial placement for students with disabilities as attendance was significantly higher and more importantly, the students displayed a higher academic achievement on the statewide assessment.

One aspect that is a necessary component to consider when placing students with disabilities in an inclusive education setting is the attitude of the parents, teachers, and administrators involved. Obviously, parent support and acceptance would be a critical component to the success of Inclusion. Leyser and Kirk (2004) used the Opinions Related to Mainstreaming Scale to survey parents of students with disabilities on their attitude towards Inclusion. Based on the legal definition of Inclusion, parents gave strong support of it and felt that inclusion would benefit the child with disabilities both socially and emotionally. On the other hand, the parents also had significant concerns with inclusion including negative attitudes, the quality of instruction, teacher training and skills, and support from teachers and other parents. If the student is fully

included in the regular class for academic instruction, it would be essential that the regular teacher be agreeable with this format and willing to help make it successful. Adams (2000) surveyed future elementary education teachers to reveal the attitudes that they have toward three special education placement possibilities (resource room, self-contained class, or regular education class) for a student with a mild disability. After reading case histories of hypothetical students, the education majors at the University of Nebraska responded to the placements that they felt would be most appropriate for each student. It was apparent that the future regular classroom educators did not feel that a self-contained class would be the best option for these students whereas the regular teacher would have no direct contact with them. On the other hand, over 75% of the education majors selected the regular education classroom room placement for a majority of the case studies involving mildly handicapped students. This overwhelming majority resulted following a grant that was initiated in the university to integrate mainstreaming concepts into the regular teaching education curriculum.

The attitudes of administrators are also an important aspect when considering Inclusion of the special education population. Praisner (2003) surveyed 408 elementary school

principals and found that only one in five of them had positive attitudes toward Inclusion. Most of the positive attitudes were directly related to the fact that those administrators had positive experiences with students with disabilities and also had specific training relating to special education concepts. It would seem obvious then that if a school or district is implementing Inclusion, they should prepare their administrators with training so that a positive climate is established.

Inclusion and the Mildly Disabled

The deficiency in reading is what preempted the learning disability label. Samuel Kirk (1962) coined the phrase 'learning disability' as he studied and reviewed published reports of children who failed miserably in reading, but displayed an average or above average intelligence. The question remains on what would be the best placement for these struggling readers. Bentum and Aaron (2003) conducted a longitudinal study that analyzed whether the reading instruction in learning disability resource rooms is really effective. The study looked at those students who had been served in the resource pull-out room for 3 and 6 years. No improvement in reading

performance was significant for the 3 year or 6 year group and a significant loss in spelling was apparent for both groups. In addition, there was no significant decline in the verbal and performance IQ of those being served for 3 years in the resource room, but there was a decline in the verbal IQ of those that had served for 6 years. Groups of students were then separated out depending on the number of hours per week spent in resource room (5, 10, or 15). There was no significant difference in reading achievement between the 3 groups. Finally, it was found that there was not a significant difference in reading achievement for those that had been taught by phonics instruction in the pull-out program and by those that had been taught by an eclectic mix of strategies in the regular classroom. Overall, it was concluded that the students being taught in resource rooms failed to make significant gains in achievement. Based on the study by Bentum and Aaron (2003), it can therefore be concluded that the regular classroom is superior to the pull-out program for students with a learning disability.

Rankhorn et al. (1998) analyzed the affect of a specific reading program on the reading progress of those with severe reading disabilities. It was found that the failure-free Reading Program produced significant

improvements in reading for those that had failed to progress from a regular classroom reading instruction. In fact, the numbers of students with severe discrepancies between intellectual ability and reading performance decreased by more than 50% after they participated in that remedial reading program. The failure-free Reading Program is intended for an intensive reading instruction taught to a small group of students, which was the manner in which the study was conducted. Pull-out programs are known to have that specific design. Students going to those sessions with a special education teacher would progress in reading at a higher rate than if they would have remained in the regular classroom for reading instruction.

Brown (1998) went one step further by comparing the academic gains in reading among mildly learning disabled students in three different program structures. They found that mildly learning disabled elementary school students did obtain significantly higher reading achievement in a self-contained special learning disabled classroom than did students in a regular classroom with outside support from a learning specialist and students in a special school for learning disabled students.

The real question with programs for students with disabilities is whether or not they are producing students

that can be productive members of society when they graduate. This is the real testament to how successful the programs are. Edgar (1987) estimated that approximately 30% of special education high school students drop out of school. Haring et al. (2001) specifically explored the success of mildly disabled students shortly after they left high school. They researched the students' current employment status, job obtainment, postsecondary training and agency access, social/recreational domains, and residential situations shortly after graduation. They also further looked into the relationship between the type and duration of special education services that the child received in high school and their post high school success. It was found in the study that the unemployment rate of disabled individuals was more than twice that of the nation youth. The biggest idea that stemmed from this research is that the amount of services provided to those youths became obsolete once they graduated from high school. For the most part, they went from receiving a myriad of different academic services in high school where accommodations were provided to them for most every major task to trying to make it out on their own in the job market. It was concluded in the research that the programs for the mildly disabled students might not be the causal factor for the

lack of post secondary success for those students, but instead the fact that those same services were no longer provided to them.

One of the programs provided to students with disabilities is inclusion in a class that contains a collaborative teaching model whereas the special education teacher teaches the regular curriculum alongside the regular teacher. Hallahan (2001) noted that it can be a successful undertaking when there is a special bond between the two teachers; although, this relationship is often difficult to forge. Researching the collaborative teaching model, Evans (2003) found that the special education teacher and regular teacher spent over half their time engaged in non-instructional behaviors. Moreover, it was clear that the disabled students in those classrooms performed very low on outcome measures. Hallahan (2001) further noted that even in the best of situations, this collaborative teaching model might not be the most effective instruction for all students. Since the instruction is taught over large numbers of students, those needing lessons taught more intensely might not receive it.

United Kingdom

The educational system in the United Kingdom consists of primary and secondary education. (NCES, 2005). Although many of the United Kingdom's students attend nursery schools, the compulsory primary education begins at age five and lasts five years. Secondary schools consist of lower and upper secondary education. The lower schools normally last three years and the upper secondary schools last one to two years, depending upon the program of study. Students receive a General National Vocational Qualification (GNVQ) certificate for entry into a vocational or technical program or earn a General Certificate of Education (GCE) that allows entrance into a university program.

The United Kingdom's use of identifying students with special needs has evolved through time. In 1944, the Education Act labeled students with special needs as being 'educationally subnormal' (Evans & Heeks, 1997). Soon after that, they became designated as 'backward readers and 'slow learners.' 1988 marked the biggest change in their educational legislation with the passage of the 1988 Education Reform Act. This act introduced a National

Curriculum that would be established throughout the United Kingdom.

The National Curriculum Online reported that the intent of the National Curriculum was to raise the standards for all students educated in the United Kingdom (About the National Curriculum, 2005). It established standards for all subject areas and determined how performance in each area will be assessed. The National Curriculum consisted of the subject areas including math, English, science, and history as well as established guidelines for religious education and sex education. In September 2002, the curriculum was amended to include citizenship as part of the curriculum taught and provided guidelines for the teaching of personal, social, and health education.

The National Curriculum of the United Kingdom is unique in that it paved the way for a more consistent means of dealing with students with disabilities (National Curriculum Online-About the National Curriculum, 2005). It contained a statement about inclusion that schools must adhere to across all curriculum subjects. This statement was intended to ensure that all students, no matter the barriers to their learning, had the opportunity to succeed. As it was highly discouraged to sway from the mandated

national standards for any student, the manner in which teachers were able to modify each curriculum area was clearly outlined in the curriculum (National Curriculum Online-Inclusion, 2005). Furthermore, the National Curriculum stated that diverse needs should be met by:

- a. creating effective learning environments
- b. securing their motivation and concentration
- c. providing equality of opportunity through teaching approaches
- d. using appropriate assessment approaches
- e. setting targets for learning

(National Curriculum Online- Inclusion, 2005, p. 3)

The curriculum also took into the account those students that were unable to meet the standards even when given appropriate modifications. It stated that teachers would then have to plan suitably challenging work that would be appropriate to the learning ability of each child. The National Curriculum was received quite well by most educators and administrators. For those involved in educating students with disabilities; however, it was marked with great debate. Evan & Heeks (1997) said, "The National Curriculum is a double-edged sword. The strength

is that it gives an entitlement to all children, but it's removing flexibility. It wasn't dreamt up with the needs of individuals in mind---either pupils or teachers."

In 1992, the National Association for Special Educational Needs (NASEN) in the United Kingdom defined a child with a learning difficulty as, "The needs of students which constrain them from the maximum access to the curriculum and the extra curricular activities of a school or institution together with other resources and facilities which are available to their contemporaries" (p.4).

It is apparent that the definition gives a vague characterization of a child with a learning difficulty, but it does not offer guidelines to help schools establish programs for them (Dyson & Gains, 1995). Currently, the 1993 Education Act is the most important law dealing with special education (DfE, 2002). It states that a child has a special educational need if he or she has learning difficulties and therefore, finds it much harder to learn than most children of the same age. In addition, it specifies the manner in which students with special needs are identified and assessed. As reported in the Special Education Needs: a Guide for Parents, learning difficulties are caused by: a physical disability; a problem with sight, hearing or speech; a mental disability; emotional or

behavioral problems; a medical or health problem; or difficulty with reading, writing, speaking or mathematics work (DfE, 2002, p. 6). Even though the United Kingdom's schools are very diverse in the special needs population it serves, the law states that all schools must publish information about their policies for children with special needs and must follow the Code of Practice set forth by the law. This code is a guidebook on meeting the needs of students with disabilities. It states that the needs of students should be met in stages. Stage 1 is the data collection stage whereas information is gathered about the child from different sources, including the teacher, parents, and school performance records. In Stage 2, the teacher of special education needs sets up an Individual Education Plan (IEP) that sets goals for the child to achieve. Finally, Stage 3 includes the arrangement of outside specialists to further help meet the needs of the child. The local education agency checks on the progress of each student and reviews the IEP at least once a year.

Currently, the United Kingdom serves students with special needs through distinct schools (Beecham et al, 2002). Students with severe disabilities, including those with autism, Down's syndrome, and complex medical issues, attend a severe learning disability school. Students with

more mild and moderate disabilities, including those with a specific learning disability and mild handicaps, attend a moderate learning disability school. Since the advent of the National Curriculum, there has been a legislative push to educate students with their regular education peers. As a result, schools were established to integrate students with special needs with their regular education peers. These schools are called mainstream schools.

In order to fully recognize the needs for disabled children, Evan and Heeks (1997) conducted case studies on 10 schools to ascertain the most effective resource for children with learning difficulties. These schools were geographically spread across the United Kingdom and included a varied student population including rural, inner-city, suburban, and a settled village. It was found that the schools participating in the study were very diverse in the means in which they used to educate students with disabilities. There were schools using individualistic means to educate those students. This involved educating them in self-contained rooms completely disconnected from the regular classroom. Some schools had also implemented the Inclusion Model of integrating the students completely in a regular classroom setting. According to Evan & Heeks (1997), the most undesirable means of educating the

students was by completely withdrawing them from the regular classroom setting. Parents were unsatisfied with the self-contained setting as they felt that it made the children feel isolated and stigmatized. Evan & Heeks (1997) further noted that there was a minority of supporters for the self-contained placement for students with disabilities. An interviewee summed up those proponents of withdrawal in this sentiment, "We need withdrawal to be seen as legitimate. Support in the classroom is like giving a child a crutch instead of operating on the knee. Schools have become afraid of withdrawal, quite wrongly. It offers some children the individual attention needed to address their problems" (Evans & Heeks, 1997, p.7)

The United Kingdom's legislation has confirmed the need for educating students with special educational needs in mainstream schools along with their school-age peers, but they have continued to establish the fact that special schools are appropriate for some children (DfEE 1998). It was reported that the school level environments were a significant factor to the success of a school, both cognitively and affectively (Adams & Adams, 2000; Creemers et al., 1989). Climates of schools vary greatly from each distinct educational setting. To help establish the distinct differences between the schools and affirm those

that were most affective, research in the United Kingdom was carried out to examine if the school climates differed and to what extent that difference had on the success of the schools. They specifically made a comparison of the special schools that delivered services to those with special education needs to the mainstream schools that had students with disabilities integrated into the regular classroom. Adams (1998) did, in fact, find that the school level climate had a significant affect on the pedagogic practices that were evident in schools for children with moderate disabilities and with severe disabilities. As a result of this finding, Adams and Adams (2000) developed a 50-item questionnaire to help evaluate aspects of the learning environment in different types of special settings. It was found that significant differences existed in the areas of special purpose, individualization, and empowerment between special and mainstream settings. Special purpose, in which a school is organized in ways to meet the needs of children with special educational needs, was found to be higher in schools serving students with severe disabilities. In addition, teachers in special schools responded that they felt more empowered than those teachers in mainstream schools through their opportunity to participate in decisions about the students. Lastly, the

highest level of individualization was found in severe disability schools and the lowest appeared to be in inclusive settings. Individualization is noted as being a positive aspect for a child's success since the teacher individualizes their lessons to meet the needs of their diverse student population. Holism was the area of school climate that proved to be significantly higher in mainstream schools than special schools. Holism is where the school makes provisions for the students' development beyond their curriculum needs. Overall, special schools appeared to be more advantageous than the mainstream schools; although, the research was focused on meeting the specific needs of students with disabilities, and not necessary on the academic success of them.

Canada

Canada is very distinct in that it has two official languages, English and French. This vast country is separated into ten provinces where the population of each province is diverse in their size, culture, political power, and economic influence. Public education is provided free to all citizens and permanent residents of Canada until the end of secondary school (CME, 1999). As the policy and

legislation regarding education as well as the manner in which they deliver services varies from province to province (Wiener & Siegel, 1992), the ages for compulsory schooling also varies. Generally, children in Canada are mandated to go to school from age 6 until age 16, but most actually complete their secondary education by age 18 (CME, 1999). Students in Ontario attend eleven years of study prior to graduation whereas other northern and rural areas sanction twelve or thirteen. Diplomas are granted to those students that pass the compulsory and optional courses for their particular programs, but this certificate is not necessarily required for enrollment in a trade-vocational program geared towards employment. On the other hand, a diploma is definitely required for admission to a university.

Since September 2001, students in Ontario must pass a literacy test in grade 10 to graduate. This test consists of standardized assessments in reading and writing. Those students with disabilities who are working towards a diploma have the same requirements set upon them. They must pass the literacy test, but are allowed accommodations. Some of those accommodations include the material being presented through an audiotape, using a computer for responses, and having answers written in by a proctor. The

literacy test results of 2002 found that 34% of students with special needs passed the test as opposed to 69% of the general population and 10% of those exceptional education students deferred taking it as opposed to 4% of the general population (Winzer, 1996).

All but three provinces have legislation regarding educating students with disabilities (Poirier et al., 1988). The three provinces without special education legislation (Prince Edward Island, Alberta, and British Columbia) do contain permissive legislation that allows the school boards to provide some services; although, they are certainly not required to do so. Weiner and Siegel (2001) studied the provincial differences regarding educating students with disabilities. They found that only five of the ten provinces require special education teachers to receive certification designating them as teachers of students with special needs. Furthermore, it is only stipulated in Quebec and Saskatchewan that children must be educated in their least restrictive environment. Moreover, special education legislation in most provinces in Canada just covers school-age children omitting any children before age five from receiving special education services. As far as parent input goes, only four of the ten provinces (Nova Scotia, Quebec, Ontario, and Saskatchewan) require

the involvement of parents in the decision-making of their child. One commonality between the provinces is the existence of provincial demonstration schools. Most provinces in Canada have these schools in order to educate those students with severe disabilities (Nichols, 2004).

Although there are separate schools to educate students with disabilities, many provinces in Canada are moving more towards an inclusive setting for their disabled population. The Ontario Ministry of Education regulated in the Education Act that, before an Identification, Placement, and Review Committee can consider placing a student in a special education class, it must, as a first option, consider whether placement in a regular class with appropriate special education services will meet the student's needs and be consistent with parental preferences (Ontario Ministry of Education, 2003). This is their legislative effort to include students with disabilities in the regular classroom to the greatest extent possible. Although the Constitution Act of 1982 was not directly related to education, its provisions impacted the legality of special education in each province: "Every individual is equal before and under the law and has the right to the equal protection and equal benefit of the law without discrimination and, in particular, without discrimination

based on ... mental or physical disability" (CME, 1999, p.43). This Canadian Charter overruled any provincial legislation regarding education and was instrumental in providing special educational services to those children with disabilities living in provinces where this was not a mandatory occurrence.

An Association of Children with Disabilities (ACD) was established in Canada in 1963. This group later changed its name to the Disabilities Association of Canada (DAC) and became one of the dominant advocacy groups for people with handicaps in Canada (Wiener & Siegel, 2001). They fully support and promote the inclusion for students with disabilities and have been instrumental in changing legislation to reflect that new paradigm.

In addition to the special provincial schools, Canadians educate students with disabilities in the regular schools as well. They have mainstream and pull-out programs in their schools, similar to the placements available for students with disabilities in the United States. In Canada, the resource classroom has been the dominant form of educational service delivered to students with special needs (Saint-Laurent, 1996). This delivery maintains that the students leave their regular classroom for specialized instruction in specific curriculum areas. Often times, the

child is out of the regular classroom less than 30% of the school day. Because of the recent inclusion effort, the pull-out model has undergone great criticism including those that believe it has a stigmatizing effect on the children and those that think that the instruction in the resource room is below par. Interestingly enough, Winzer (1996) reported that 71% of the secondary and 87% of the elementary schools did have pull-out programs for the mildly disabled students, but 70% of those secondary schools and 55% of the elementary schools did not provide any inservice programs to their staff to familiarize them with the needs of their those students. Mainstreaming disabled students in the regular classroom would therefore not be appropriate if the teachers educating them did not have the appropriate training.

Peer attitudes are also a major factor to consider when including students with disabilities in the regular classroom. McDougall et al. (2004) examined the attitudes of ninth grade students in Ontario, Canada towards their peers with disabilities. It was found that 61% of the students examined held positive and above neutral feelings towards their peers with disabilities. A considerable number of 21% held negative or below neutral attitudes towards their peers with disabilities. Furthermore, it was

discovered that those schools that fostered learning and understanding for all students, instead of social and academic competition, held the most positive reactions from their student body.

Research from Canada also focused on self-esteem and the effect that class placement has on LD children. Beltempo and Achille (1990) looked specifically at the extent of services that the child received outside the regular classroom. They found that those children who were receiving educational services outside the regular classroom for more than 70% of the school day had significantly lower self-concepts. Those children were taught in a self-contained classroom for the majority of the day and rarely came into contact with any of their regular education peers. On the other hand, those disabled children who received no special services and remained in the regular classroom for the entire day also possessed a low self-concept. It was found that the highest self-concept was apparent in the disabled children who received integrated services. Those services included regular class placement with pull-out instruction for no more than 30% of the school day.

Australia

Australians and its permanent residents are provided a free public education (Australian Government, 2005). Their school year operates from late January or early February until early December. English is the primary language of instruction in Australia, although some regions also educate the students in their indigenous tongues. For second language education, most Australian schools offer a variety of Asian and European languages with Japanese and French being the most widely taught. Similar to education in Canada, the States and Territories legislate and establish the provisions for their educational system. The education in most States and Territories is normally thirteen years in length and is divided into preparatory year, primary schooling and secondary schooling. The preparatory year is not compulsory, but most Australian children do take advantage of it. Although the school attendance requirement is from age six to fifteen, children are eligible to start school even earlier than six. Although similarities in the educational system do exist between the States and Territories, there are, in fact, many differences as well. Children in some States begin their formal education at age five, while other areas of

Australia have some four year-olds starting their preparatory school year. Other differences include the number of years spent in school prior to graduation, the break-up of each elementary and secondary school in yearly components, and the assessment and reporting of achievements made by the student body.

Australia is a country where school choice is the norm. It was adopted by a liberal labor government in 1973 (Andrews, 2002). The government subsidizes private education on a sliding scale. Students with a high socio-economic background receive far less than those living in poorer areas. Underprivileged children can, in fact, receive up to 97% of the cost of attending the private school. A large percentage of the non-government schools are actually religiously affiliated and a study has been initiated to determine the extent to which faith improves the academic achievement for those with learning impairments.

All Australian States and Territories offer programs for students with disabilities (Australian Government, 2005). The services include programs for students with intellectual and physical disabilities, behavior disorders, and special learning needs. Furthermore, specialized programs are also established for gifted and migrant

students. Periodically, the student may have a disability that the local schools cannot provide for. This therefore requires the student to live away from their home to attend and live at a special education institution that can meet their needs. The Australian Government website describes the special education institution as one that is "conducted specifically and primarily for students with disabilities, health-related conditions and/or learning difficulties; and a government school, or a non-government school that is recognized as a school under the law of the State or Territory in which that school is located" (Australian Government, 2005, p.14). The financing of these services and for the services provided to all children with disabilities are shared between the Federal Government and the States and Territories.

Instead of learning disabilities, Australia designates those students with having learning difficulties. This term refers to the large group of children who need extra assistance in schooling (Elkins, 2004). Gale (2001) reported that a low IQ or a social and/or economic disadvantage is used to explain such learning difficulties. Unlike that of the United States, Australia relies on the professional judgment of its educational staff, instead of legislation, to decide what is best for these children

(Elkins, 2004). Identification is often based on the child's current behaviors, although formal and informal techniques are also sometimes utilized. Even though there is no legislative requirement established to identify and service these children, special attention is given towards identifying them at an early age. The initial designation is mostly done through the regular classroom teacher. The teacher establishes specific difficulties in children by making observations of students as they work on tasks, questioning students individually or in small groups, analyzing samples of students' written work, using teacher-made or published tests, using an inventory or checklist of core knowledge and skills, and diagnostic testing (Westwood, 2000).

There are three types of programs available for children with learning difficulties in Australia:

Type 1: Minor modifications to the strategies, resources, and classroom learning environment

Type 2: Major modifications to the strategies, resources, and classroom learning environment

Type 3: Extensive modifications to the strategies, resources, and classroom learning environment.

(DEST, 2005, p. 39)

Most often, children with learning difficulties are either receiving educational services directly in the regular classroom or are pulled out in a resource room for about 40 minutes a day (Elkins, 2004). The resource room provides intensive one-on-one or small group instruction usually in the curriculum areas of reading or mathematics.

Inclusion has also been at the forefront of education in Australia. Being a school choice country, the Australian government provides supplemental funding for children with disabilities to both private and public schools (Andrews, 2002). As it turns out, those regions that provide the most flexibility in school choice also have the best record of mainstreaming students with learning disabilities in the regular classroom. Although it has been more common for students with learning difficulties to be integrated in the regular classroom for instruction, there has been some disagreement about its affect on the students. Gale (2001) said, "It is not enough to include students within the same physical spaces. Inclusion is more concerned with the arrangement of social spaces and the opportunities for students to explore and develop within these. The interests of all students also need to be represented within schools, not just the dominant of society."

New Zealand

In the late 1980's, the education system in New Zealand underwent substantial changes (Andrews, 2002). Their Department of Education with 4,000 employees turned into a Ministry of Education staffed by only 400 employees. Each local school was then controlled by a community board of trustees. Children, at that time, also had their choice of schools to attend as school zoning was abolished. The states were even willing to pay for attendance at private schools. Initially, creaming was evident. This is where schools actively pursued the best and brightest students and turned down the more costly ones, the ones that needed additional services to be educated. Since the passage of two legislations, this action has discontinued. In 1999, a supplemental voucher program was aimed at benefiting the country's indigenous population, the Maori. It also established a non-discriminatory policy that the schools accepting state funds must abide by. In 2000, New Zealand approved a Special Education policy where schools would receive supplemental funding for each learning-disabled child that they accepted. The supplemental funding would also follow the child to their new school if they transferred.

The educational system in New Zealand is primarily taught in English (New Zealand Educated, 2005). Children begin their primary school education at age five. They then attend an intermediate school at age 11 and a secondary school at age 13. It is common for students to graduate at age 17 or 18. Students work towards their NCEA from Year 11 to Year 13 of their education. Whether the student attends a public or private secondary school, they still must meet the national qualifications for attaining their final certificate. According to the Pure New Zealand Education Services (2004), education in New Zealand can be described as, "Innovative teachers, small classes and a world recognized and accredited education system-this is what it means to be educated in New Zealand" (p. 1).

Currently, students in New Zealand graduate with a National Certificate of Educational Achievement (NCEA) (NZQA, 2005). There are three types of certificates granted. Level 1 certificate is for those students interested in vocational training or in getting employment immediately following secondary school. Level 2 and 3 are for those most interested in continuing their education at a university. Achievement at the Level 3 level actually qualifies the student to apply for a New Zealand Scholarship.

Summary

In summary, the review of literature has provided an historical overview of major legislation regarding students with disabilities as well as precedent-setting case law that ruled on the least restrictive environment. These noteworthy statutes and related case law are the front runners to establishing the current placement of students with disabilities in an appropriate educational setting. Although the research examined has had mixed results regarding the inclusion of students with disabilities here in the United States and abroad, it definitely favored Inclusion, especially when the study involved academic achievement. It is evident though that many factors must be considered prior to the complete integration of students with disabilities with their regular education peers. As indicated in the research findings, some unintended negative consequences could definitely result from an Inclusion placement when it is not properly thought out and planned.

CHAPTER III: METHODOLOGY

Introduction

The introduction of this paper presents a general case for the need of continued research in the field of students with disabilities; especially those studies that seek to determine the most beneficial learning environment for them. This study was designed to investigate the programs for students with disabilities worldwide as well as the legislation mandating those initiatives. The researcher also sought to determine the extent to which students with disabilities are being taught in a regular classroom environment in a sample of countries across the globe. Because the language barrier would impede the ability to gather the necessary research, this study utilized the educational data from only English-speaking countries such as the United States, Canada, the United Kingdom, Australia, and New Zealand. In this chapter, methods and procedures will be discussed, including a review of the statement of the problem, population and sample, and the data collection and analysis utilized. Because the research questions were qualitative, the researcher utilized a descriptive approach

to make valid conclusions. The research questions addressed by this study were:

1. What are the legislative mandates concerning Inclusion of students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States?
2. What are the educational models of teaching students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States?
3. What is the difference in the reading, math, and science knowledge base for 15-year-old students in the United Kingdom, Canada, Australia, New Zealand, and the United States?
4. What is the system of categorizing students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States?
5. To what extent are students with disabilities educated in the regular classroom in the United Kingdom, Canada, Australia, New Zealand, and the United States?

Statement of the Problem

Educating students with disabilities is not merely an issue with which the United States must deal, but an international challenge. The educational laws of each country stipulate the manner in which education will be provided to students with disabilities. The United Kingdom, Canada, Australia, New Zealand, and the United States all have laws sanctioning the education of students with disabilities; however, those laws differ greatly in the specificity toward the Inclusion of students with disabilities in the regular education classroom. Further investigation will be done to determine the legislation mandating the education of students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States and how that legislation dictates the Inclusion of students with disabilities.

Countries also differ greatly in the manner in which students with disabilities are categorized. Some countries, like the United States, have a very extensive categorization system whereas students are grouped and served in accordance with the characteristics that they display. It is further evident that within each disability category, like mental retardation, many school districts in

the United States also use sub categories that further group students by the severity of their intellectual capacity. On the other hand, other countries have a much more straightforward system of classifying students with a disability in that they do not use disability categories, but instead just have a dual system whereas the only decision made is on whether or not the student has a disabling condition that needs further resources than the regular classroom can provide. Many countries are actually somewhere in-between those two extremes. The researcher will analyze the system of categorizing students with disabilities in the United Kingdom, Canada, Australia, and New Zealand.

In the United States, Inclusion has become a widespread model for serving students with disabilities. That model was designed to follow the true intent of the law mandating the education of students with disabilities in the least restrictive environment (Andrews, 2002). Other countries also implement the Inclusion Model for students with disabilities; although, there are differences in the extent to which that model is being instituted across each disability category. This study will analyze how the United States and other countries educate their disabled

population and further examine how extensive their Inclusion Model is.

Population and Sample

The population for this study is those English-speaking countries with formal education systems that recognize and serve handicapped students in their schools: the United States, United Kingdom, Canada, Australia, and New Zealand.

Data Collection and Analysis

For the previously mentioned sample of countries, the researcher utilized a descriptive study to compare the legislative mandates regarding students with disabilities and the educational models serving them. Legislation regarding students with disabilities was gathered by examining primary and secondary legal sources. The primary sources consisted of the Education for All Handicapped Children Act (PL 94-142) and all of the subsequent amendments to that act. The secondary sources consisted of legal periodicals, journals, and websites containing information about the legislation in the United Kingdom, Canada, Australia, New Zealand, and the United States.

The researcher also completed a review of related literature to describe the educational models serving students with disabilities in the sample countries and to explain the categorization system used to classify and educate them. Furthermore, a qualitative approach was used to analyze the difference in the reading, math, and science knowledge base of the sample countries. Data was gathered from the Program for International Student Assessment (PISA) that tested a sample of 15-year-olds in 22 different countries. Finally, a qualitative approach was used to explain the variation of disabled students in an Inclusion Model for all the different disability categories in the United Kingdom, Canada, Australia, New Zealand, and the United States.

CHAPTER IV: ANALYSIS OF THE DATA

Introduction

The focus in this study is the international comparison of students with disabilities and the extent to which they are educated in the regular classroom. Results of this study show variation in which the laws of each country comprise special education provision and how that disparity also leads to the difference in how students with disabilities are educated in the public school system.

Research Question One

What are the legislative mandates concerning Inclusion of students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States?

All countries examined had legislation that dealt with the education of students with disabilities. Some were definitely more specific than others. This chapter will seek to explain the legal structure that drives the education of students with disabilities in the schools across the globe and how the laws specifically dealt with the inclusion of student with disabilities in the regular classroom.

The United Kingdom

The 1944 Education Act was the first piece of educational legislation in the United Kingdom (Evans & Heeks, 1997). It labeled students with special needs as being "educationally subnormal." The power to manage the complexities of the educational system, including the education of those with disabilities, was given to the Local Education Authorities (LEAs) (Harris, 2004). Educators had control over much of the curriculum taught in their classroom. This educational legislation lasted for four decades until Margaret Thatcher's Conservative party weakened local control over schools and colleges (Harris, 2002). In 1988, the Education Reform Act was passed which transferred financial management of schools and curricular power over to the government (Evans & Heeks, 1997). It established a National Curriculum that all students were taught, regardless of whether they attended a public or private institution. This curriculum paved the way for a more consistent means of dealing with students with disabilities (National Curriculum online-About the curriculum, 2005). It addressed the needs of students with disabilities by containing an inclusion statement that clearly outlined how teachers could modify the curriculum

to provide all students with relevant and appropriately challenging work (National Curriculum Online-Inclusion, 2005). That inclusion statement stated that the diverse needs in the classroom had to be met by:

- a. creating effective learning environments
- b. securing their motivation and concentration
- c. providing equality of opportunity through teaching approaches
- d. using appropriate assessment approaches
- e. setting targets for learning

(National Curriculum Online-Inclusion, 2005, p. 3)

The National Curriculum even further specified how to alter the curriculum to meet the needs of students whose attainments fell significantly below the expected levels.

The Education Reform Act of 1988 has since been amended in 1993, 1996, and finally in 2002. The Education Reform Act Amendment of 1993 is the most important law that dealt with special education (Evans & Heeks, 1997). It provided a definition for students with disabilities that is still in existence today. It defined special needs as "A child has special education needs if he or she has a learning difficulty which calls for special educational

provisions to be made for him or her" (Harris, 2004, p. 3). The Act also defined a child with a learning difficulty as someone having "a significantly greater difficulty in reading than the majority of children of the same age" (Harris, 2004, p.4). Furthermore, the Education Reform Act Amendment of 1993 required that the needs of all students with disabilities must be met through three stages:

1. Data collection stage-information is gathered about the child from different sources
2. Development of IEP-teacher of special education needs sets goals for the child to achieve
3. Specialist support-arrange outside specialists to help meet the needs of the child

(Harris, 2004, p. 5)

The inclusion of students with disabilities was a major component of the Amendment of 1993 (Evans & Heeks, 1997). Specific statements were included that showed support for it. It stated that "most children with special educational needs must be educated in mainstream settings as opposed to 'special' schools and classes" and that "All teachers are teachers of children with special education needs" (Harris, 2002, p. 3). As a result of the law and its

inclusive mandates, schools were established to integrate students with special needs with their regular education peers (Beecham et al., 2002). Those schools were called mainstream schools.

The 1996 Amendment gave further power to the LEAs for the education of the disabled (Harris, 2002). It required them to check on the progress of each student and review the IEP at least once a year. Furthermore, the LEAs had to make provisions for a full-time or part-time education for those students with disabilities who were excluded from school for fifteen or more days.

The Education Act Amendment of 2002 had a significant affect on students with disabilities both in public and private schools. It directed LEAs to monitor the provisions made for students with special education needs in independent schools (Harris, 2004). If it was found that the disabled students were not given the necessary accommodations, the school would be required to write up an action plan that would include a detailed description of how that school would meet the needs of their special education population. If the school continued to be out of compliance, they could lose their national register and be forced to close. This was a noteworthy modification to the United Kingdom's educational law as students with special

education needs were only previously monitored if they attended a public school.

In addition to detailed statements regarding students with disabilities in the National Curriculum and in the Amendments to the Education Act, other specific legislation in the United Kingdom has been enacted that clearly puts the education of students with disabilities to the forefront. In 1995, the Disability Discrimination Act was enacted (Harris, 2002). Although this Act mainly dealt with the discrimination of disabled employees in the workplace, it set the course for establishing further equality and justice for students with disabilities in the school system. It was later amended as the Special Educational Needs and Disability Act of 2001 (Harris, 2004). This Act mandated the LEA to arrange for the increased participation of disabled students in the school curriculum as well as improve the physical environment of the schools to make it more accessible students with handicaps. This Act further made it unlawful to discriminate against a disabled student in relation to admittance to a prospective school or in the exclusion of them from any school curriculum, club, trip, or extra-curricula activity. Furthermore, the Special Educational Needs and Disability Act of 2001 established a Special Needs Tribunal that would respond to complaints of

discrimination and, consequently, make judgments and orders remedying the situation. The inclusion of students with disabilities in the mainstream classroom was also strengthened in this legislation as it made it a "duty to educate a child with a statement of special educational needs in a mainstream school and normally alongside children who do not have such needs, unless that would be incompatible with the wishes of his or her parent or with the provision of efficient education for other children" (Harris, 2004, p. 5).

The definition of students with special education needs (SEN) underwent drastic changes in the United Kingdom. The first piece of educational legislation, the 1944 Education Act, defined SEN children as 'educationally subnormal' (DfE, 1994). This definition remained in place until the passage of the 1993 Education Act. This Act defined a student with special needs as someone who "has a learning difficulty which calls for special educational provision to be made for him or her" (DfE, 1994, p. 62). Students with learning difficulties were further defined as having "a significantly greater difficulty in reading than the majority of children of the same age" (Dessent, 1987, p. 9). The definition of SEN students continued to be

transformed as the National Association for Special Educational Needs (NASEN) defined them by:

The needs of students which constrain them from the maximum access to the curriculum and the extra curriculum activities of a school or institution, together with other resources and facilities which are available to their contemporaries (NASEN, 1992, p. 4).

Canada

Canada is divided into ten provinces and three territories. There is no Federal Department of Education as each jurisdiction has complete control over its own educational policies (MacCuspie, 2004). The Minister of Education in each jurisdiction is an elected position and is comparable to a Superintendent of Schools within the United States (Dworet & Bennett, 2002). Each province also has an elected school board, though the Minister of Education dictates the power that each board possesses in establishing educational policy.

Canada, possessing great geographic and ethnic diversity, is faced with many challenges regarding serving students with special education needs (Dworet & Bennett,

2002). For one, students being served in the remote areas of the country often have to wait for up to six months to be assessed as there are extreme shortages of special education staff members in those areas. Often times those children are not even provided the appropriate special education services that they qualify for as those programs are not available in the areas they live in. Because of Canada's ethnic diversity, there are challenges with assessing the students in their native tongues and correctly staffing them in the program that would best meet their needs (Andrews, 2002). Lastly, many provinces in Canada are facing a severe teacher shortage, especially in the area of special education (Dworet & Bennett, 2002). This is due to the low teacher wages, increased accountability on the part of the school systems, and the ever-increasing diversity of the population.

The Charter of Rights and Freedoms of 1982 was the first and only national legislation mandating the fair treatment for students with disabilities as it noted that "discrimination based on a handicapping condition is not permitted" (Weiner & Siegel, 2001, p. 347). Even though the educational policy and procedures mandating the education of students with disabilities are established in each jurisdiction, the Supreme Court's rulings have

supremacy over all provinces and territories (Winzer, 1996; Dworet & Bennet, 2002). In the case of *Eaton v. Brant County Board of Education*, a ruling was made on the best interest of the child (EduLaw, 1997). Originally, the Ontario Identification, Placement and Review Committee (IRPC) decided that Emily, a 12-year-old girl with severe disabilities, should be placed in a special education classroom. Since the parents wanted a more inclusive setting for their child, the case was further brought to the Divisional Court, which agreed with the original ruling. The case then went to the Ontario Court of Appeals which overturned the original ruling and stated "integration should be the first choice of classroom placement and that any segregated placement must be in accordance with the parent's wishes" (EduLaw, 1997, p. 49). The school board of Ontario brought the case to the Canada Supreme Court. The Supreme Court decided that a segregated special education setting was in the best interest of the child as all placements should take into account "the child's best interest and special needs" (EduLaw, 1997, p. 50). It further ruled that "there is no inherent basis for the belief that a regular education class is a more appropriate placement than special class placement" (EduLaw, 1997, p. 50)

One commonality between provinces is that all students must receive a free and appropriate education (Weiner & Siegel, 2001). Although its name may vary, another significant similarity that exists between provinces is the use of an Individual Education Plan (IEP) to prescribe the education that those students with disabilities will experience (Dworet & Bennet, 2002). The information contained on each IEP is very similar: demographical data, statement of educational concerns, educational assessment data, description of the present program, recommendations, and review procedures.

From jurisdiction to jurisdiction, there are significant differences on how special education programs are run. These differences are due to the diverse policies regarding students with disabilities in each province/territory. Table 1 summarizes the different educational mandates for students with disabilities in each jurisdiction with regards to placement, funding, teacher education, identification, and assessment.

Table 1: Legally Mandated Provincial and Territorial Practices for Educating Students with Disabilities

	Placement	Funding	Teacher Education	Identification	IEP or Equivalent
Alberta	Least restrictive environment	IEP designated need basis	Certification in Special Education with additional courses taken beyond Education Degree	Decision by multi-disciplinary team	Individual Program Plan
British Columbia	Least restrictive environment	Based on category and severity of exceptionality	Certification in Special Education with additional courses taken beyond Education Degree	Decision by multi-disciplinary team	Individual Education Plan
Manitoba	Inclusion	IEP designated need basis	Certification in Special Education with additional courses taken beyond Education Degree	Decision by multidisciplinary team	Individual Education Plan
New Brunswick	Inclusion	IEP designated need basis	Special Education courses part of Education Degree	Decision by multi-disciplinary team	Individual Education Plan
* Newfoundland & Labrador	Least restrictive environment	IEP designated need basis	Special Education Degree needed	Decision by multi-disciplinary team	Individual Support Services Plan
Nova Scotia	Inclusion	IEP designated need basis	Special Education courses part of Education Degree	Decision by multi-disciplinary	Individual Program Plan

				team	
Ontario	Least Restrictive Environment	IEP designated need basis	Certification in Special Education with additional courses taken beyond Education Degree	Requires confirmation of disability by a doctor or psychologist	Individual Education Plan
Prince Edward Island	Inclusion	IEP designated need basis	Special Education courses part of Education Degree	Decision by multi-disciplinary team	Individual Education Plan
Quebec	Least restrictive environment	Based on category and severity of exceptionality	Certification in Special Education with additional courses taken beyond Education Degree	Decision by multi-disciplinary team	Individual Education Plan
Saskatchewan	Least restrictive environment	IEP designated need basis	Certification in Special Education with additional courses taken beyond Education Degree	Decision by multi-disciplinary team	Personal Program Plan

Red Boxes-Special Education mandates that differed from other Canadian provincial procedures

*Newfoundland and Labrador have no Special Education legislation

Data taken from (Dworet & Bennet, 2002)

To summarize Table 1, Newfoundland and Labrador provinces have no legislation that deals specifically with the education of students with disabilities, but instead have developed an inclusion model based on national anti-discrimination documents. All other provinces do have their own legislation that regulates how students with special education needs will be educated and Table 1 provides the distinctions between each. Inclusion is the only placement option in the smaller provinces of Canada: Prince Edward Island, New Brunswick, and Nova Scotia. All other provinces have different legislative terminology regarding special education placement, but all fall under the definition of the least restrictive environment. The Ontario Ministry of Education (1998) reported that Regulation 181/98 (part 4, section 17) of Ontario states that the IRPC shall decide to place an exceptional pupil in a regular classroom when such a placement meets the pupil's needs and is in accordance with parental preferences. In most provinces, the Individual Education Plan (IEP) determines the funding required as services are specifically documented on it. In British Columbia and Quebec, funding is determined by the category of exceptionality that the student falls under. As for Special Education certification, every teacher in Canada must be certified under their provincial governing

body. Most provinces require additional courses to be taken beyond an Education Degree for certification of Special Education. In the provinces that mandate Full Inclusion, New Brunswick, Nova Scotia, and Prince Edward Island, there is no specialized Special Education Degree since all teachers are educators of students with disabilities in an Inclusion Model. Special Education courses are therefore taken as part of the requirements for a Degree in Education. Although the process can vary to some extent, all jurisdictions utilize a committee to identify students with exceptionalities and staff them into appropriate programs. In Ontario, the teacher first identifies struggling students to an In School Team that recommends strategies that the regular teacher can use in the classroom to improve the student's academic success (Ontario Ministry of Education, 2000). If the student continues to struggle, they are then brought up to the IRPC that staffs the student into an exceptional education program. In Saskatchewan, Canada, it is mandated that four criteria must be met in order to deliver special education needs services.

1. The student must meet the classification criteria identified in the definitions

2. The student must be provided with an appropriate program that meets his/her needs.
3. The program must be delivered by, or the delivery must be supervised by, a teacher with special education teacher qualifications acceptable to the minister
4. The costs of the program are equal to or greater than the recognized costs in the grants structure
(OECD, 2004, p. 34)

Ontario is the only province that has legislative mandates regarding an appeal process for parents. If a parent is dissatisfied with the educational decisions made about their special needs child, they can opt to appeal the process through the school board. The case, as it did in *Eaton v. Brant County Board of Education*, can even eventually be appealed to the Canada Supreme Court if previous rulings were not accepted by either the school board or the parents of the child with special education needs.

Australia

In 1901, the Commonwealth of Australia was created and school education became a State and Territory

responsibility (National Office of Overseas Skills Recognition, 2000). Therefore, the Federal Government had no Constitutional sanctions over the educational policies. In 1993, the Commonwealth of Australia enacted the Disability Discrimination Act (Heubeck & Latimer, 2002). Although this law was not specifically designed to mandate the establishment of programs and services for students with learning difficulties in the schools, it did guarantee the fair and equitable treatment of them, along with the entire disabled population in Australia.

Even though there is no national legislation specifically designed for its establishment, all Australian States and Territories offer programs for students with disabilities, (Australian Government, 2005; DEST, 2004). Instead of national legislation, Australia relies on the professional judgment of its educational staff to decide what is best for these children (Elkins, 2004). Identification is often based on the child's current behaviors, although formal and informal techniques are also sometimes utilized. The financing of these services and for the services provided to all children with disabilities are shared between the Federal Government and the States and Territories.

Current legislation in Australia mandates basic skills testing for students in grades three, five, and seven. These standardized assessments are used to make decisions about funding for particular groups or programs (Elkins, 2004). Comparisons are also made between states and schools. Unfortunately, results of the tests do not disaggregate the population of students with learning difficulties and therefore no comparisons can be made with their performance and the type of instructional support that they received. These standardized tests are used though to help identify those with specific learning difficulties. Those children identified through teacher assessments and national standardized tests are then referred to a support team that can further assess them. (Rivalland & House, 2000). The support team then decides the level of support that each child would need. As is often the case in large countries serving vast number of children, the level and nature of support varies from state to state, from school sector to school sector, and even from school to school (Elkins, 2004).

New Zealand

Prior to 1989, the education system of New Zealand was operated by the New Zealand Department of Education

(Rishworth, 1999). This Department developed the teaching curriculum and teacher certification requirements, employed teachers, and owned and operated the schools. In 1988, a government-sanctioned task force was established to review the current educational administration. In a government document, *Tomorrow's Schools*, it was determined that reforms for education should include the dissolution of government-run schools and a reformation of schools managed by local community members (Mitchell, 1996). As a result of the published document, the Education Act of 1989 was enacted. This act gave more educational authority to the community as it required each state school to have an elected Board of Trustees that would hold office for three years (Rishworth, 2002). The Board of Trustees, made up of parents, students, and other interested community members, would be responsible for drawing up their own charter. This charter would have a detailed description of the school objectives, within the context of the National Curriculum. As for the education of students with disabilities, the charter would also ensure that the school's policies and procedures allowed for equitable outcomes for all students, regardless of disability (Mitchell, 1996). Section 8 of the Education Act of 1989 specified that "people who have special education needs (whether because of disability or

otherwise) have the same right to enroll and receive education at state schools as people who do not" (Mitchell, 1996, p. 62). The Board of Trustees was required to include the following statement in their charter:

To enhance learning by ensuring that the school's policies and practices seek to achieve equitable outcomes for students for both sexes; for rural and urban students; for students from all religions, ethnic, cultural, social, family and class backgrounds and for all students, irrespective of their disability (Department of Education, 1989, p. 10).

The Education Act of 1989 further permitted an extended formal education for those students with disabilities (OECD, 2004). It made it possible for students with disabilities to begin their formal education at 3 and remain in school until age 21. Finally, the Education Act of 1989 called for the establishment of a Special Education Service (SES) (Mitchell, 1996). The SES's main focus was to provide guidance and support to schools in carrying out their charter obligations for students with disabilities. It was originally set up as a free service to school

facilities and parents for the equitable treatment of students with disabilities.

In 1991, the New Zealand government published an article, the *Statement of Intent*, which was designed to evaluate the present trend of Special Education in New Zealand (Ministry of Education, 1991). As a result of the assessment, the government introduced the following proposals to improve the course of Special Education and bring power back to the individual learning facilities and their communities:

1. families will be able to make informed choices about their children's education
2. the learning institution will have the responsibility for providing an appropriate education for all students
3. clear accountability
4. mechanisms for monitoring performance
5. independent, objective method of determining eligibility for services
6. decentralized service to enable maximum delivery of services

(Mitchell, 1996, p. 56)

In addition to the Education Act, students with disabilities were benefiting from the national civil rights act. In 1993, New Zealand enacted the Human Rights Act (Rishworth, 1999). This law prohibited discrimination on the basis of sex, marital status, racial origin, ethnic or national origin, religious or ethical belief, age, political opinion, disability, family status, and sexual orientation. This law helped give access to an appropriate education for students with disabilities as it became unlawful to discriminate in educational facilities. Rishworth (1999) reported that Section 57 of the Human Rights Act of 1993 "prohibits educational establishments from refusing or failing to admit a student with a disability; or admitting such a student on less favorable terms and conditions than would otherwise be made available, except where that person requires special services or facilities that in the circumstances cannot reasonable be made available" (p. 461) The Human Rights Commission was established to help mediate any discrimination claims and prosecute those companies, educational facilities, and individuals that were not obeying the law.

New Zealand's education system is governed by a National Curriculum that encompasses guidelines and goals.

According to the Ministry of Education (2004) the guidelines are "intended to direct schools in effective policy and practice" (p.1) and the goals "incorporate a focus on students with special education needs in their emphasis on a broad and balanced curriculum, equal opportunities for all, and consideration of those with special needs" (p.2).

The concern of those with special needs was even more evident with the passage of a Special Education policy in the year 2000. This national policy consisted of seven principals.

1. Learners with special education needs have the same rights, freedoms and responsibilities as people of the same age who do not have special education needs
2. The primary focus of special education is to meet the individual learning and developmental needs of the learner.
3. All learners with identified special education needs have access to a fair share of the available special education resources.
4. Partnership between parents and education providers is essential in overcoming barriers to learning.
5. All special education resources are used in the most effective and efficient way possible, taking into account parent choice and the needs of the learner.
6. A learner's language and culture comprise a vital context for learning and development and must be taken into consideration in planning programs.
7. Learners with special education needs will have access to a seamless education from the time that their needs are identified through to post-school options.

(Ministry of Education, 2004, p.3)

United States

The Individuals with Disabilities Education Act (IDEA) was launched as the Education for All Handicapped Children Act (EAHCA) in 1975 (88 Stat. 773). This law required that a free appropriate education be provided to all qualifying children with disabilities. Federal dollars were given to the states for this specific purpose. Prior to the passage of the initial law PL 94-142, more than one million children with disabilities were not being served by the public school system. There were a few with less severe disabilities who were actually being schooled by the public school system, but unfortunately, their needs were not being met as the disabilities often went undiagnosed. Public Law 94-142 has been amended multiple times, but the foundation of the law has remained the same. It is simply that students with disabilities have an opportunity that they never had prior to 1975. This opportunity allows them to reach higher levels of achievement and learn the skills necessary to make them productive members of society.

Since the enactment of PL 94-142 in 1975, the IDEA has undergone several amendments. In 1983, it was amended as Public Law 98-199 (97 Stat. 1103). This amendment was significant because it changed the law to include programs

for preschool children with special needs. Public Law 94-142 was further amended in 1986 (100 Stat. 1145). This amendment provided for the award of reasonable attorneys' fees and costs to parents who prevailed in legal actions against their school district for failing to provide a free, appropriate public education to their children. It also called for special education services to be provided to children with disabilities from birth to age 2. In 1990, the amendment changed the language used to refer to children with disabilities (Education of the Handicapped Act Amendments of 1990, 104 Stat. 1103). A 'handicapped student' would now be referred to as a 'student with a disability.' Furthermore, it added traumatic brain injury and autism as separate and distinct classes that would be addressed based on the law. In 1991, there was yet another amendment to the law (IDEA Amendments of 1991, 105 Stat. 587). The biggest change in 1991 affected those students not currently identified as having special needs. It actually included services for students at risk of substantial developmental delays if intervention services were not provided. This included low-income, minority, rural, and other under-served populations. Finally, in 1997 the IDEA was amended as Public Law 105-17 (IDEA Amendments of 1997, 111 Stat. 587). The importance of this law was

that it placed an emphasis on the least restrictive environment which made it mandatory to include the disabled students in the regular classroom to the maximum extent possible. This was a necessary addition to the law because many students with special needs were being excluded from having contact with their regular education peers. Although services for them were being implemented, they were often in a separate area of the school building without access to the mainstream population. PL 94-142 mandated that:

...to the maximum extent appropriate, children with disabilities...are educated with children who are not disabled, and that special classes, separate schooling, other removal of children with disabilities from the regular environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be attained satisfactorily. (EAHCA of 1975, 88 Stat. 773)

The IDEA Amendments of 1997 added:

...emphasize the importance of educating children and youth with disabilities with their nondisabled peers to the maximum extent appropriate. (111 Stat. 37)

The expectation under the new law is that the child will participate in the regular classroom unless sufficient reason is demonstrated that such participation is not appropriate (Lipton, 1999). The law further required that placement in the regular classroom may include supplementary aids and services (Yell & Drasgow, 1999).

Research Question Two

What are the educational models of teaching students with disabilities in the United Kingdom, Canada, Australia, New Zealand, and the United States?

United Kingdom

United Kingdom's main methods of educating students with special needs are through two venues--Special schools and mainstream schools (Adams, 1998). Special schools are segregated educational facilities designed to educate only those students with special education needs. There are two categories of special schools, those for moderate learning disabilities and those for severe learning disabilities.

Moderate learning disability schools would encompass those students whose needs can be met through minimal special education services. Students who have vision and hearing impairments that impede on their ability to work in a regular classroom may also attend moderate learning disability schools. On the other hand, severe learning disability schools serve those students who need maximum special education services and equipment.

Special schools in the United Kingdom are staffed differently than mainstream schools (Adams, 1998). First of all, there is a lower teacher-student ratio as an abundance of support staff is available to assist the teachers in meeting the students' individual needs. The staff also consists of specially trained teachers who have elected to take extra courses to get certified in the area of Special Education. Lastly, special schools have a variety of specialized equipment designed to accommodate the students in their classroom.

Mainstream schools are the other venue used to educate students with disabilities. Most often, students with a mild disability attend these schools and are educated alongside their regular education peers (Adams & Adams, 2000). The students with special education needs are completely integrated into the regular classrooms often

without the support staff or specialized equipment that special schools would provide. The students with special needs are educated with the regular curriculum and provided only a minimum of accommodations.

Canada

As Canada's education system is controlled by each province and territory, the educational placement of students with disabilities differs from jurisdiction to jurisdiction. Table 2 lists each province and specifies the educational model mostly utilized for students with special education needs.

Manitoba, New Brunswick, and Prince Edward Island are the smaller provinces of Canada and provide no outside resources for students with disabilities. They, in effect, operate a Full Inclusion program where all students, regardless of their disability, are educated and provided resources in the regular education classroom; although, there are instances where parents of children with severe disabilities in those provinces opt to have their child go to boarding schools in other provinces where they can receive a more intensive special education program (Dworet & Bennet, 2002). All other provinces in Canada practice a

model of 'least restrictive environment' where the placement of each child depends on the severity of their disability. Those with mild disabilities spend a majority of their school day with their nondisabled peers and those with more profound disabilities are taught in a self-contained placement with other children with disabilities. Figure 2, the U.S. Placement Model for Students with Disabilities, gives a clear picture of the placements also available in the least restrictive formats of many of the provinces in Canada.

Table 2: Canadian Provincial Special Education Placement Policy

Canadian Province	Special Education Policy
Alberta	Least restrictive environment
British Columbia	Least restrictive environment
Manitoba	Inclusion
New Brunswick	Inclusion
Newfoundland & Labrador	Least restrictive environment
Nova Scotia	Inclusion
Ontario	Least Restrictive Environment
Prince Edward Island	Inclusion
Quebec	Least restrictive environment
Saskatchewan	Least restrictive environment

Least restrictive environment-student is provided a continuum of services from least restrictive to highly restrictive
 Inclusion-students with disabilities are educated in the regular classroom with services being rendered there.

Data taken from (Hutchinson, 2001)

Australia

As Australia's education system is controlled by each province and territory, the educational policy regarding students with disabilities differs from jurisdiction to jurisdiction. The States and Territories offer a variety of programs to meet the needs of students with varying exceptionalities (Australia Government, 2005). Programs are offered for students with intellectual and physical disabilities, behavior disorders, special learning needs, gifted students, and for migrant students. The most restrictive environment that Australia offers is a special education boarding institution. According to the Australian Government Website (2005), these institutions are for students with disabilities, health-related conditions and/or learning difficulties. In order to attend these boarding institutions, students must apply for an Away from Home entitlement. If approved, students may board at these institutions at a state or territory that they don't otherwise live in. Other less restrictive placements include special schools within the students' jurisdictions, resource room placements for less than 40% of the school day, and Inclusion in the regular classroom. As will be noted in Question Five, the majority of the students with

learning difficulties in Australia are taught in the regular classroom environment.

New Zealand

New Zealand provides an array of support for students with disabilities (Pure New Zealand Education Services, 2004). Some of the resources provided include specialist support, therapy, staffing, equipment and other materials, as well as property modifications and transportation. Transportation assistance includes a subsidy or allowance for taxi or bus for travel between home and school. Property modifications refer to the capital payment disbursed for alterations or additions to school property that enable the students with special needs to participate in regular activities. The assistive equipment provided is a range of tools for students that make it easier for them to access the learning curriculum. Table 3 describes the programs and assistance available.

Table 3: New Zealand Programs and Assistance for Students with Disabilities

<p>Support for Young Children with Moderate High, or very High Needs</p>	<p>Support for Students with Moderate Special Education Needs</p>	<p>Support for Students with Combined Moderate, High and Very High Special Education Needs</p>
<p>Early Intervention Support for young children from birth until transition to school</p>	<p>Special Education Grant Funding for all schools as part of their operational funding to be used for special education programs</p> <p>Enhanced Program Fund Funding for schools with a disproportionate number of students with moderate special education needs</p> <p>Resource Teachers: Learning and Behavior Specially trained teachers who support and work within school settings</p> <p>Resource Teachers: Literacy Specially trained teachers who support and work in schools, assisting staff to meet the needs of students with reading and writing difficulties</p>	<p>Ongoing and Reviewable Resourcing Schemes Funding for extra teaching, specialist programs, therapy, consumables and education support</p> <p>Speech-Language Initiative Speech-language therapy usually provided at schools for students with high communication needs</p> <p>Severe Behavior Initiative Advice and specialist support for students with severe behavior difficulties, their schools, families, the community and government agencies</p> <p>High Health Needs Special education support through two initiatives, Regional Hospital Health Schools and the School High Health Needs Fund</p> <p>Regional Hospital Health Schools Schools that have the responsibility for managing a teaching service or students with high health needs</p> <p>School High Health Needs Fund Paraprofessional support for students with care and safety issues arising from high health</p> <p>Supplementary Learning Support Support students with special education needs including students with significant and ongoing learning needs</p>

Data taken from (Pure New Zealand Education Services, 2004)

United States

Although the Individuals with Disabilities Education Act emphasizes the importance of educating children and youth with disabilities with their nondisabled peers to the maximum extent appropriate, most states in the United States offer a continuum of services for students with disabilities. Depending on the severity of the child's disability, the child will receive services ranging from most restrictive to least restrictive. Figure 1 depicts the placement options available along a continuum from least amount of time with nondisabled peers to full integration with them.

MOST RESTRICTIVE

Homebound/hospital: Includes children who are served in either a home or hospital setting, including those receiving special education and related services in the home and provided by a professional or paraprofessional who visits the home on a regular basis or schedule.

Residential facility: Includes children who reside in a publicly or privately operated program and receive special education or related services for greater than 50 percent of the school day.

Separate facility: Includes children and youth who receive special education services for greater than 50 percent of the school day in a school facility that only houses programs for students with disabilities

Self-contained classroom-Educating students with disabilities on a full-time basis in a separate classroom designed only for students with exceptionalities. This term is used to describe students who attend the public school but, because of their disability, spend no time in a regular classroom setting.

Resource room-Educating students with disabilities in a classroom designed only for students with disabilities and educated by a special education teacher. Students are often only educated in this environment for less than 50% of the school day. This term is synonymous with pull-out services.

Regular Classroom (Inclusion): Includes children with special needs who are educated with the general curriculum in the regular classroom along with their nondisabled peers

LEAST RESTRICTIVE

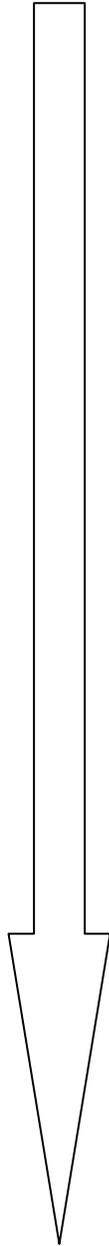


Figure 1: U.S. Placement Options for Students with Disabilities

Data taken from (NCES, 2005, p. 1)

Research Question three

What is the difference in the reading, math, and science knowledge base for 15-year-old students in the United States, the United Kingdom, Canada, Australia, and New Zealand?

The Program for International Assessment (PISA) conducted an international survey to compare the knowledge and skills of 15-year-olds in reading, math, and science (OECD, 2003). The population sample included non-disabled students as well as, to the maximum extent possible, those disabled students enrolled in special education institutions, provided resource instruction in regular schools, and those totally integrated in regular classroom instruction. The study noted that excluded students were excluded based on three categories.

1. Students with an intellectual disability-student has a mental or emotional disability and is cognitively delayed such that he/she cannot perform in the PISA testing situation.
2. Students with a functional disability-student has a moderate to severe permanent physical disability such that he/she cannot perform in the PISA testing situation.

3. Students with a limited assessment language proficiency—student is unable to read or speak any of the languages of the assessment in the country and would be unable to overcome the language barrier in the testing situation.

(OECD, 2003, p. 320)

In summary, students were only excluded from the PISA study if their disability and language acquisition were so severe that it prevented them from being able to perform in a testing situation. As population coverage goes, the study noted that “PISA 2003 reached standard of population coverage that are unprecedented in international surveys of this kind” (OECD, 2003, p. 320). It is therefore noted that those students with mild to moderate disabilities are represented in the scores as those students would have been included in the sample population. Table 4 describes the exclusion rate from each country by breaking down the number of students that were excluded according to disability and also giving an overall exclusion rate expressed as a percentage of the sample population. Figure 2 compares the reading, math, and science acquisition of 15-year-olds in the United Kingdom, Canada, Australia, New Zealand, and the United States (OECD, 2003, p. 91-93). The

table also contains the average results from OECD, which is an organization of 30 democratic countries focusing on economic and social issues (see Appendix 1).

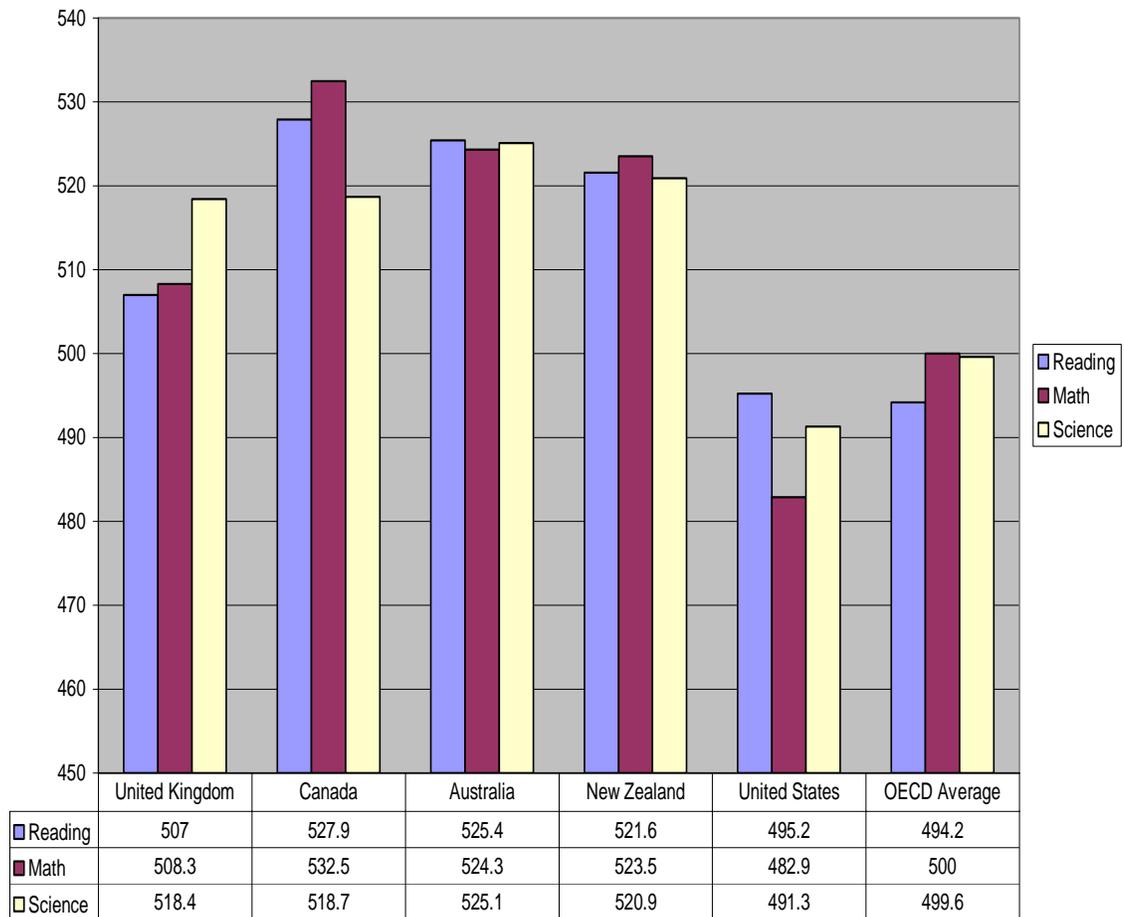


Figure 2: Average Scores of 15-year-old Students in Reading, Math, and Science: 2003

Note: Scores are reported on a scale with a mean of 500 and standard deviation of 100. Statistical comparisons between the U.S. average and the OECD average take into account the contribution of the U.S. average toward the OECD average

Data taken from (OECD, 2003)

Table 4: Exclusion Rates of Students Participating in the PISA Study

Country	Total Population of 15-year-olds	Number and Percentage of Participating Students	Number of excluded students with disabilities (Code 1)	Number of excluded students with disabilities (Code 2)	Number of excluded students because of language (code 3)	Overall Exclusion Rate (%)
United Kingdom	768,180	9,535 1.2% of total population	23	208	39	5.4
Canada	398,865	27,953 7% of total population	100	1,590	303	6.8
Australia	268,164	12,551 4.7% of total population	33	133	62	2.2
New Zealand	55,440	4,511 8.1% of total population	29	94	140	5.1
United States	3,979,116	5,456 .1% of total population	32	431	71	7.3

Exclusion codes:

Code 1: Functional Disability-student has a moderate to severe permanent physical disability

Code 2: Intellectual disability-student has a mental or emotional disability and has been tested as cognitively delayed

Code 3: Limited assessment language proficiency-student is not a native speaker of any of the languages of the assessment in the country

Data taken from (OECD, 2003, p. 322)

Summary

In examination of the reading scores of 15-year-old students, all the countries investigated performed better than the United States (495.2). In addition, all countries scored higher than the OECD average (494.2); although the United States was only slightly higher. Canada with a score of 527.9 outperformed all the countries examined as well as the OECD average.

In examination of the math scores of 15-year-old students, all the countries investigated performed better than the United States (482.9). All countries, with the exception of the United States, scored higher than the OECD average (500). Canada (532.5) outperformed all the countries examined as well as the OECD average.

In examination of the science scores of 15-year-old students in science, all the countries investigated performed better than the United States (491.3). All countries, with the exception of the United States, scored higher than the OECD average (499.6). Australia (525.1) outperformed all the countries as well as the OECD average.

In examination of Table 4 concerning the exclusion rates, the United States had the smallest percentage of their total 15-year-old population participating in the

study (.1%). New Zealand, although having a smaller population than the United States, had the highest percentage of their total 15-year-old population participating in the study (8.1%). Canada, at 7% of their total population, had the highest number of 15-year-old students participating (27,953).

Students were only excluded from the study if their disability was so severe that it prevented them from taking it. Three disabling conditions excluded were a functional disability, intellectual disability, and limited language proficiency. The United States had the highest percentage of 15-year-old students excluded (7.3%) and Australia had the lowest (2.2%).

In all subject matters assessed, the United States performed lower than the United Kingdom, Canada, Australia, and New Zealand. The United States also performed lower than the OECD in all subjects with the exception of reading, but the score for reading was only slightly higher with a scale score difference of 1. As for those excluded from taking the test, the United States had the lowest percentage of their population participating in the study and also the highest percentage of them excluded. Australia, on the other hand, had the lowest percentage of their population participating, but had the lowest percentage of

them excluded (2.2%). In comparing the subject area scores with the exclusion rates, Australia had superb scores in all areas (2nd highest in reading and math and highest in science) and had the lowest percentage of their students excluded from taking the test. Canada also excelled on the PISA with the highest scores in reading and math, but also had a high exclusion rate, second only to that of the United States.

Research Question Four

What is the system of categorizing students with disabilities in the United Kingdom, Canada, Australia and New Zealand?

Countries employ different categories for classifying students with disabilities. Some countries use labels that cover a multitude of disabilities while other countries forgo any labels at all. Table 5 depicts the categorical labels that are supported by special education in each country. Each country utilizes their own naming system to identify the disabilities, but the definitions categorized them into the thirteen disabilities listed. For example, New Zealand categorizes students with sub-average intelligence as having a learning difficulty whereas most other countries refer to those students as having mental

retardation. The definitions of each disability are given in the Definition Section of Chapter 1. New Brunswick, Canada and the United States further divide the term mental retardation into more distinct labels by classifying their students as having a light, moderate, or profound mental retardation. Emotional and Behavioral Difficulties is another category in which some countries, like the United States and the provinces of Canada, classify their students into mild and severe subcategories. Since the education system in Canada is legislated, managed, and administered through each province, the researcher used a sample of four diverse provinces in Canada: Alberta, British Columbia, New Brunswick, and Saskatchewan.

Table 5: Disability Categories by Country

	Canada (Alberta)	Canada (British Columbia)	Canada (New Brunswick)	Canada (Saskatchewan)	Australia	New Zealand	United States
Blind and Partially Sighted	√	√	√	√	√	√	√
Deaf and Partially Hearing	√	√	√	√	√	√	√
Emotional and Behavioral Difficulties	√	√	√	√		√	√
Profound Mental Retardation	√	√	√	√	√	√	√
Moderate Mental Retardation	√	√	√	√	√	√	√
Mild Mental Retardation			√				√
Physical Disabilities	√	√	√	√	√	√	√
Combinatorial Disabilities	√	√	√	√			√
Learning Disabilities	√	√	√	√	√		√
Speech and Language Disabilities	√		√			√	√
Hospital				√		√	
Other							√
Autism		√		√			√

Note: The United Kingdom was not included in this table due to the fact that it has a non-categorical system for serving students with disabilities. Australia's disability categories shown are representative of the national norm as the data was missing on individual territories

√-Disability category is recognized in the education of students with disabilities in each region.

Data taken from (OECD, 2003; DfE, 2002; DEST, 2005).

Summary

In accordance with Table 5, the provinces of Canada, Australia, New Zealand, and the United States all provide special education services for a number of the thirteen disabilities listed. In that grouping of countries, there were several inconsistencies with the special education categories that are used to educate the students with disabilities. For instance, only New Brunswick, Canada and the United States recognized and served those students with mild mental retardation along with the other more extreme mental conditions. All other countries listed only staffed and served students with moderate and profound mental conditions. The public education systems in the Canadian provinces of British Columbia and Saskatchewan as well as in Australia do not authorize special educational services for those with speech and language difficulties. Instead, those services, if rendered, are provided through private therapy. Furthermore, the Canadian province of Saskatchewan and the country of New Zealand provides special education services to those in hospitals for extended stays due to illnesses and other debilitating conditions. The federal law in the United States declares the categories used for special programs. According to the IDEA, the term "children

with disabilities” refers to a student who falls into one or more of the following categories of disabilities:

Autism, deaf-blindness, hearing impairments (including deafness), mental retardation, multiple disabilities, orthopedic impairments, other health impairments, serious emotional disturbance, specific learning disabilities, speech or language impairments, traumatic brain injury, and visual impairments (including blindness).

(NICHCY, 1994, p. 1)

This federal law mandating the education of students with disabilities in the United States does not specify Hospital as a Special Education category, but many states and school districts include special education services for those students (FLDOE, 2000). For the category of Other Health Impaired, the United States is the only region that recognizes and groups together those individuals that have chronic or acute health problems that adversely affect their performance. Examples of Other Health Impairments include asthma, attention deficit disorder, diabetes, and epilepsy. Lastly, the category of Autism displayed great variance between the regions. Less than half of the regions

(British Columbia, Saskatchewan, and the United States) have a classification for this disability and serve their students accordingly.

The country of Australia is the only region that provides no special education services to those students who have emotional and behavioral difficulties. Therefore, those students are integrated completely, without any special education support, into the regular classroom.

New Zealand was the only country that did not recognize Learning Disabilities and Combinatorial Disabilities as a special education category. Overall, Australia and New Zealand had the least amount of categories for students with disabilities and the United States had the most, recognizing all disabilities with the exception of Hospital.

Categorical System of the United Kingdom

The United Kingdom was not listed in Table 5 because it has a non-categorical system for defining and tracking the students with special education needs (SEN) (OECD, 2004). Instead of defining the students in a disability category, the United Kingdom categorizes children with SEN in two ways: those with statements and those without

statements (see Table 6). The Local Education Authority (LEA) makes a statement for a student when the needs of the child cannot be met through the normal resources of the school. According to *Special Education Needs: a Guide For Parents*, a statement is "a legal document that sets out the child's needs and all the special help he or she should have, which may include money, staff time and special equipment...will also specify the educational placement of the child-whether in mainstream (regular) school, special school or other form of specialist provision" (DfE, 2002).

The statement consists of six parts:

1. demographic information
2. describes the child's learning difficulties and disabilities as established from the assessment
3. special help needed, short and long term objectives, established timeline to regularly review progress
4. school site
5. non-educational needs such as transportation
6. describes how student will get non-educational needs established in Part 5

(DfE, 2002, p. 26)

The LEA does not bestow a statement to those students with SEN whose needs can be met through the normal resources of a school. As is pointed out in the response to Question 5, most of those students with SEN without statements are educated in the regular classroom environment. Table 6 lists the two categories of disabilities served in the United Kingdom.

Table 6: Disability Categories: United Kingdom

	United Kingdom
Children with statements of special educational needs	√
Children with special educational needs without statements	√

Research Question Five

To what extent are students with disabilities educated in the regular classroom in the United Kingdom, Canada, Australia, New Zealand, and the United States?

The percentage of students who are recognized as having disabling conditions and needing extra resources to be educated in the school system varies from country to country. Figure 3 displays the number of students with disabilities that are educated in the public school systems

of each region as a percentage of the entire student population. Percentages were derived from the total population of each disability in the compulsory school years of each region (see Appendix B).

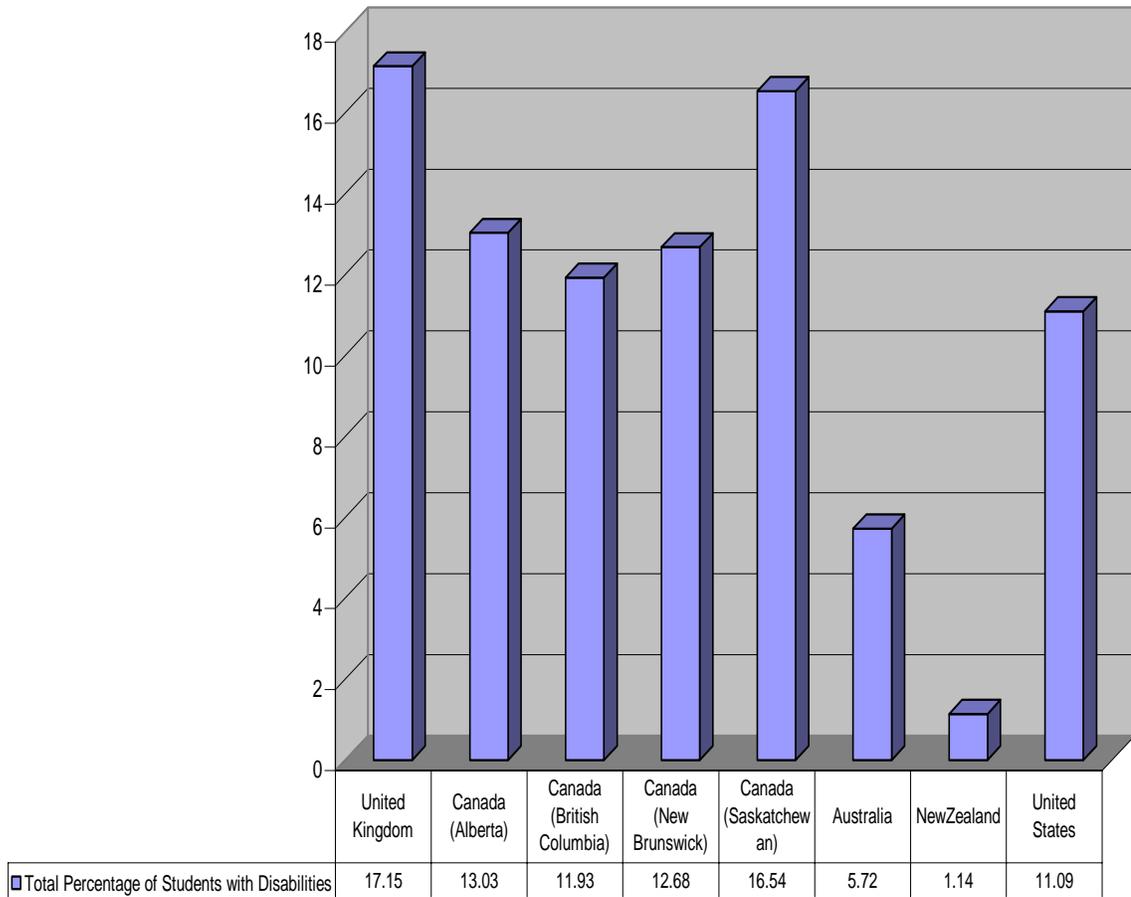


Figure 3: By Region, Number of Students with Disabilities as a Percentage of the School Population
Data taken from (OECD, 2004)

Based on Figure 3, New Zealand (1.14%) has the lowest population of students recognized as having disabling conditions and the United Kingdom (17.15%) has the highest. It is important to ascertain how many of those students with disabilities are being educated in the regular classroom alongside their non disabled peers.

Disabilities and Inclusion

Internationally, students with disabilities are educated in a variety of settings ranging from most restrictive to least restrictive. Education in the regular classroom is the least restrictive environment for a student with a disability. It is there that they are fully educated alongside their nondisabled peers. Figure 5 and 6 demonstrate the extent that each region implements Inclusion. As a percentage of the total student body, Figure 4 displays the number of students with disabilities as well as the number of them educated in the regular classroom. Figure 5 compares the number of students with disabilities educated in the regular classroom as a percentage of all students with disabilities.

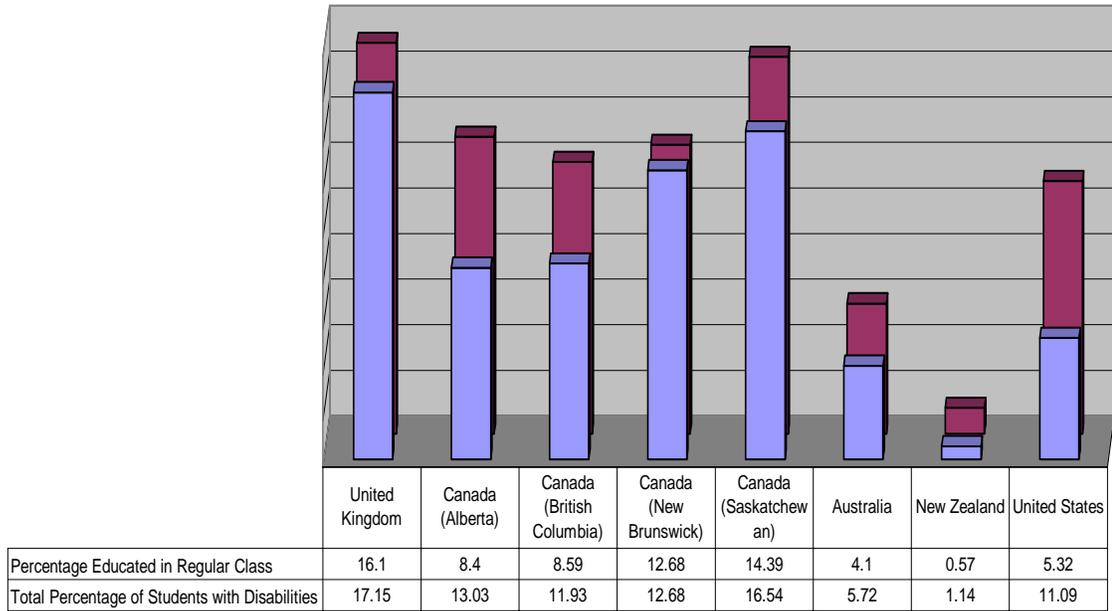


Figure 4: As a Proportion of the Student Population, the Percentage of Students with Disabilities and the Percentage of Them Educated in the Regular Classroom
Data taken from (OECD, 2003)

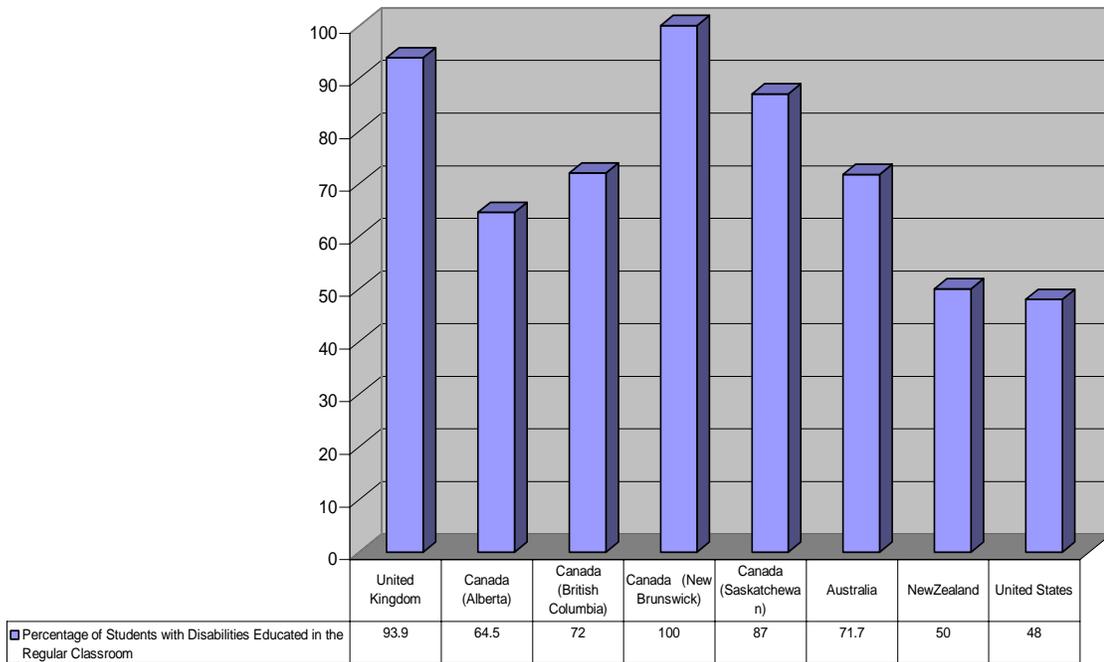


Figure 5: By Region, the Percentage of Students Educated in the Regular Classroom as a Proportion of All Students with Disabilities
Data taken from (OECD, 2003)

Summary

Figure 4 and 5 give a clear picture of the manner in which the students with disabilities are served in the least restrictive environment and educated for the maximum amount of time with non disabled students. As per Figure 4, the United Kingdom (17.15%) and the Canadian province of Saskatchewan (16.54%) exceed all the other regions in their percentage of students with disabilities. It is important to note though that out of all of those students with disabilities, almost 94% of them are served in the regular classroom in the United Kingdom and 87% are served in that capacity in Saskatchewan. In New Zealand, only 1.14% of the population is provided with special education services, the lowest percentile out of all regions analyzed. Out of those students categorized with having a disability in New Zealand, 50% are educated in the regular classroom. In addition, 11.09% of the United States student population is served under the regulations of IDEA and 48% of them are educated in the regular classroom. As discussed earlier, the Canadian province of New Brunswick practices a Full Inclusion Model for the students with disabilities and therefore, it is shown that 100% of students with disabilities are taught in the regular classroom.

Inclusion and Disability Categories

Figure 4 and 5 gave a clear depiction of the extent that each region carried out the Inclusion Model by focusing on the total population of students with disabilities. There is great discrepancy though in the types of disabilities that countries opt to include in their regular classes. Most often, those students with mild disabilities are included at a greater rate than those with profound disabilities. Full Inclusion declares that all students will receive their education, along with resources and accommodations, in the regular classroom. By region, Table 7 will examine the extent that each disability category is included in the regular classroom.

Table 7: Percentage of Students Served in the Regular Classroom by Disability Category as a Proportion of All Students in Each Category

	Canada (Alberta)	Canada (British Columbia)	Canada (New Brunswick)	Canada (Saskatchewan)	Australia	New Zealand	United States
Blind and Partially Sighted	83.0	m	100	100	81.5	88.6	70.3
Deaf and Partially Hearing	78.1	98	100	100	72.7	59.6	58.7
Emotional and Behavioral Difficulties	63.4	72.0	100	88.4	x	85.2	48.5
Mild Mental Retardation	x	73.9	100	x	x	x	70
Moderate Mental Retardation	19.1	21.1	100	21.2	16.2	12.8	18
Severe Mental Retardation		2	100		4		0
Physical Disabilities	71.6	82.6	100	100	80.2	25.2	69.2
Combinatorial Disabilities	62.7	m	100	100	78.6	x	29.1
Learning Disabilities	78.1	88.4	100	93.1	88.7	x	81.7
Speech and Language Disabilities	m	x	100	x	x	0	95.2
Hospital	x	x	x	m	x	0	x
Other	x	x	x	x	x	x	72.2
Autism	x	96	x	82	x	x	43.3

x-Special Education Category not recognized in region

m-missing data

Data taken from (OECD, 2003;DEST, 2005)

Summary

Table 7 represents the number of students with disabilities receiving their education and services in the regular classroom as a percentage of the total population of each disability category served in compulsory school education. New Brunswick, Canada has 100% of students with disabilities served in the regular classroom in each category as that province is one that practices Full Inclusion. Students, in that region, are provided all their necessary resources in that regular classroom environment. The Canadian province of Saskatchewan also has a large percentage of each disability served in the regular classroom. The only exceptionality that was exceedingly low in that region was the moderate and severe mental retardation category. As is commonly the case, these students are often excluded because they do not have the same capacity to learn as those in the regular classroom. All other exceptionalities though are above an 80% inclusion rate, including those with autism.

As Table 7 suggests, the inclusion rates of most of the disability categories in the United States are lower than those of the other regions. Those exceptionalities that the United States includes the least in the regular

classroom are emotional and behavioral difficulties (48.5%), moderate (18%) and severe mental retardation (0%), combinatorial disabilities (29.1%), and autism (43.3%). In the United States, students with autism are served almost half as much in the regular classroom as they are in other regions. Those exceptionalities that the United States educates the most in the regular classroom are Blind and Partially Sighted (70.3%), Mild Mental Retardation (70%), Learning Disabilities (81.7%), Speech and Language Disabilities (95.2%), and Other Health Impaired (72.2%). As it appears in Table 7, those same exceptionalities are included in the regular classroom at an even higher percentage in most of the other regions examined.

The United Kingdom and Inclusion

The United Kingdom was not included in Table 7 because of the fact that it has a non-categorical system for educating students with SEN. Those students with more severe disabilities are not branded with a disability label, but instead are issued a statement from the LEA that describes the services that will be provided to them. Table 8 lists the number of SEN students with and without statements that are educated in the regular classroom as a

percentage of all the students in that category.

Percentages were derived from the total population of each category in the compulsory school years (see Appendix B).

Table 8: Number of Students with SEN served in the Regular Classroom as a Percentage of All Students in Each Category

	United Kingdom
Students with Statements of SEN	65
Students with SEN without Statements	99

Data taken from (OECD, 2003)

In the United Kingdom, almost all of the students with SEN without statements are included in the regular classroom (99%). This is understandable as the definition for those SEN students without statements is that their needs can be met through the resources of the regular school. Those students therefore have more mild disabilities than the SEN students with statements. Then again, Table 8 illustrates that even a majority of those

SEN students with statements in the United Kingdom are educated and provided resources in the regular classroom (65%).

Summary

Overall, the provinces of Canada have made a valid effort to include a higher percentage of students with disabilities in the regular classroom than the other regions investigated. The Canadian province of New Brunswick is actually the only region that has made an educational leap to provide all students with an education, regardless of the severity of their disability, in the regular education classroom. In the United Kingdom, most students with disabilities, especially those with mild disabilities, are provided resources in the regular education classroom and therefore taught in the same environment as their nondisabled peers. The United States, in most disability categories, serves the lowest percentage of students with disabilities in the regular classroom.

CHAPTER V: DISCUSSION AND RECOMMENDATIONS

Introduction

This research was conducted to study the inclusion efforts of students with disabilities worldwide. In this chapter, the researcher will discuss and review the findings discussed in Chapter IV in relation to the research questions.

Question Three in the study made a comparison of the countries by examining the results of 15-year-olds on an international assessment. Questions One, Two, and Four focused primarily on the legislation regarding students with disabilities and how those national laws translate into the education of them in the public school system. Finally, Question Five examined data on the inclusion of students with disabilities in the regular classroom. The researcher is hopeful that the questions will shed light on the countries that are making a valid effort at providing students with disabilities an equitable education. Whether that equates with the inclusion of them in the regular classroom, this study will help ascertain.

Differences in the Educational Laws

The education systems of the United Kingdom and New Zealand are mandated, funded, established, and managed by the Federal laws, guidelines, and curriculums of the country. On the other hand, the education systems of Canada and Australia are operated by the individual provinces and territories that make their own laws and guidelines for the education of all their students, including those with disabilities. The United States differs in that there are Federal laws and guidelines regarding the education of students with disabilities, but each state applies those laws to make policies and procedures that are relevant for their specific needs.

Students with disabilities are also covered under laws pertaining to the civil rights of the disabled population. All countries in this study currently have legislation pertaining to the discrimination of students with disabilities. Most often, those laws mainly dealt with the fair treatment of them in the workplace, but they also established equality and justice for students with disabilities in the school system.

As for the inclusion of students with disabilities, there were distinctive differences between how detailed the laws in each country were. In the United Kingdom, the Education Reform Act Amendment of 1993 has statements that fully support Inclusion, "most children with special educational needs must be educated in mainstream settings as opposed to 'special' schools and classes" and "All teachers are teachers of children with special education needs" (Harris, 2002, p. 3). Similarly, the IDEA of the United States declares that, "to the maximum extent appropriate, children with disabilities are educated with children who are not disabled" (EAHCA, 88 Stat. 773). Then again, the Federal law of the United States does not advocate for Full Inclusion as it states, "that special classes, separate schooling, other removal of children with disabilities from the regular environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be attained satisfactorily." The laws of New Zealand, on the other hand, do include statements regarding the equitable treatment of students with disabilities, but they do not, in fact, make an assertion that equitable refers to the education of them in the regular classroom alongside their nondisabled peers.

The laws actually focus more on the access to an education that students with disabilities must get and meeting individual needs once that access is obtained: "learners with special education needs will have access to a seamless education from the time that their needs are identified" and "the primary focus of special education is to meet the individual learning and developmental needs of the learner" (Ministry of Education, 2004, p. 3). Since there is no Federal regulation that mandates the education of students with disabilities in Canada and Australia, the treatment of them varies from territory to territory. Most provinces in Canada and territories in Australia support Inclusion by placing the students in the least restrictive environment. For those students with mild disabilities, this translates to the regular education classroom. Some provinces in Canada even practice Full Inclusion and serve all their students with disabilities, regardless of the severity, in the regular classroom.

The regular classroom is the placement provided to the majority of students in schools worldwide. This placement is obviously one that is expected to teach the students the skills so that they can be productive members of society when they graduate. The legislative statements of the countries or lack of them, regarding the Inclusion of

students with disabilities give a clear indication of each country's position on whether they believe that the disabled population also deserves that same privilege and advantage. According to the laws, the United Kingdom is far more explicit that an equitable treatment of students with disabilities refers to the education of them in a classroom with their nondisabled peers. The laws of the United States make that same claim too, but they certainly don't declare that it is the only placement alternative. All other placements suggested are ones where the disabled student population is completely segregated from the regular population receiving a different education than the masses. Because there is no indication of an Inclusion statement in the laws of New Zealand, it can be inferred that that placement is not the favored one when making educational decisions for each child with disabilities. Because of the fact that there are no national laws regarding the education of students with disabilities in the countries of Canada and Australia, it can be concluded that an equitable education for that population is not one of prime importance. Both countries allow each province and territory to decide the fate of the disabled students, giving those regions the complete flexibility of the Inclusion of them or extreme segregation.

Differences in the Educational Placement Models

Both the United States and most of the Canadian provinces offer an array of placement alternatives for students with disabilities on a continuum from the most restrictive to the least restrictive. Although New Zealand also offers a range of placement alternatives, many are highly restrictive and completely segregated. Many students there with moderate and severe disabilities live and are educated in boarding institutions that homogeneously serve only those with disabilities. An alternative placement for the more severe disabled includes education in a special school that is established to only serve students with disabilities. New Zealand also offers other less restrictive environments including resource rooms and Inclusion placements. There are only two placement options available for the disabled population in the United Kingdom: special schools and mainstream schools. Special schools are a segregated placement alternative that educates only those students with disabilities, but mainstream schools are completely inclusive as all services and resources are given to the student in the regular education classroom.

The disabilities that students have range from mild to moderate to severe. The disabled students at each level of

severity would need different resources to accommodate them in the educational system. Those students with more severe handicaps would obviously need more intensive services than those students with more mild disabilities. Most countries have adapted their educational system to provide a placement alternative that would meet the needs of every kind of disability. The United Kingdom, on the other hand, provides only two different placement alternatives; one completely segregated from the general population and one completely inclusive. It is doubtful whether the wide variance of disabilities can adequately be served in only two placement alternatives.

Differences in the International Assessments

All students with disabilities having the capacity to take the test were included in the PISA study. It was clear from the study that the United States scored the lowest in all the subject areas: reading, math, and science. In addition, they also excluded a higher percentage of students from taking the test than any other country. Australia had one of the highest scores in all areas and also excluded the lowest percentage of students.

Based on the PISA study, one can not make the argument that the United States had lower scores due to the fact that they had more students with varied intelligence take the test. The opposite is actually true. Their exclusion rate was higher than the other countries analyzed. As it turns out, the country that did exclude the lowest percentage of students, Australia, actually performed better on the subject area tests.

Differences in the Categorization System

Most countries have distinct categories for their disabled student population that encompass all the different exceptionalities. Clearly, the United States has the most disability categories that they use to label, educate, and provide resources for the students with disabilities. The education system of the United Kingdom, on the other hand, does not use disability categories at all, but instead makes the distinction on whether the child can be educated with the normal resources of the regular school or not. Some provinces of Canada and New Zealand do not have a category for the mildly mentally retarded and

therefore would not provide additional services to this population under special education guidelines.

Although disability labels often have a negative connotation, they do provide schools with information regarding the amount of resources that each child would need to be provided with an equitable education. There is a big difference in the manner in which a student with severe mental retardation should be educated and how a student with a learning disability should be. The United States has the most classification labels for students with disabilities and also provides an abundance of placement options to meet their needs. The United Kingdom has an education system that does not classify their students with disabilities into any specific exceptionality, but they also only provide two options with which to educate them. Without a significant classification system, it would be very challenging to provide an equitable education to all students, even those with varying exceptionalities.

Differences in the Inclusion Effort

In comparison to the countries studied, the United Kingdom has the highest percentage of students with disabilities that receive their education in the regular

classroom and the United States has the lowest. The United States even has a lower percentage included in most every disability category.

Countries offer the general education classroom for a majority of its students and expect that that will provide them with the necessary skills to be successful later in life. In the United States and New Zealand, about half of the students with disabilities are not given that same advantage. They instead are educated in placements where they are less likely to graduate, attend college, and even find decent paying jobs. The United Kingdom and most provinces in Canada do place most of their disabled student population in the regular education class to receive the education that the students without disabilities are privy to.

Implications OF the Inclusion Effort of Students with Disabilities Worldwide

Many factors are involved in determining the manner in which countries educate their students with disabilities. For one, the legislative efforts provide the school districts with a foundation to base their Special Education program on. In addition, the placement models provide the

location options for educating the students with disabilities. Lastly, the categorization systems of each country determine the way in which the students will be grouped which, in turn, establish the extent to which the students will be educated with their nondisabled peers.

The educational legislation regarding students with disabilities in the United Kingdom is very specific about the manner in which students with disabilities will be included in the regular classroom and leaves very little room for alternative placement. In addition, their system of categorizing students with disabilities is a much more simplified version than all other countries analyzed. The student is never identified with any disability label; instead a judgment is simply made on whether those students can be successful with the resources provided in a regular classroom. The LEAs, determining whether or not to bestow a statement on the student, makes that decision. Although a large majority of their students with SEN are determined to not require a statement and therefore become educated in the regular classroom with additional resources, the United Kingdom has the most number of students earmarked as having a disability. This means that the educational models initially employed to educate them were not successful as the students required further accommodations. As it stands,

the United Kingdom has the highest percentage labeled as having a disability, but also has the highest percentage of those educated in the regular classroom with additional resources. As a result, a considerable majority of the disabled population in the United Kingdom is provided an education in the regular classroom alongside their nondisabled peers.

If the United Kingdom falls on one extreme side of the Special Education spectrum, then the United States falls on the other. It is one out of only two countries that has national laws that are solely focused on the manner in which students with disabilities will be educated. Most other countries have statements regarding students with disabilities included in their national education laws or even have no national Special Education decrees at all. In addition, the United States has the most complex categorization system utilizing more disability labels than any other country. Many states and corresponding school districts have even subdivided the major national labels determined by IDEA into more specific ones (FLDOE, 2000). For instance, those students with emotional handicaps can either be grouped in the mild category, Emotionally Handicapped, or the more profound category, Severely Emotionally Disabled. In addition, the United States

provides their students with the most placement alternatives, those included on the continuum from least restrictive to highly restrictive. Even though IDEA states that "to the maximum extent appropriate, children with disabilities are educated with children who are not disabled," only about half of the disabled student population in the United States is provided that privilege on a full-time basis, the lowest percentile of all other countries analyzed (EAHCA, 88 Stat. 773).

In addition to the United States, New Zealand has national regulation directing the manner in which students with disabilities will be educated in the schools across the country. Special Education 2000 declares that "Learners with special education needs have the same rights, freedoms and responsibilities as people of the same age who do not have special education needs." Although this national legislative attention is given to students with disabilities, New Zealand has the lowest percentage of their student population categorized as having a disability. It is clear that the educational models taught to students in New Zealand are so effective that only a very small percentage of their population requires extra resources to be successful.

As the provinces in Canada are self-regulated in regards to the education of students with disabilities, there are distinct differences in the extent to which students with disabilities are educated in the regular classroom. Some provinces have incorporated the Full Inclusion Model that serves all children, regardless of the severity of their disability, in the regular classroom. The categorization system of each province also differs. Therefore, it is quite plausible that a student moving from one province to another could lose their disability label and subsequent services simply because they relocated to a less extensive Special Education model. Even though there is great disparity between the provinces, all four regions analyzed included a higher percentage of the disabled population than the United States.

In relation to the countries investigated, Australia has the most minimal legislative directives for the education of the disabled population. In addition, they have the least amount of disability categories that they use to group their students and the smallest number of placement alternatives. Finally, a low percentage of their student population is actually considered disabled, half that of the United States. The researcher surmises that their low disability count is due to multiple factors:

1. The Education Model provided to them has been so effective that only a small percentage of that student population require extra resources.
2. There is such little national attention given to students with disabilities that staffing them into a program for students with disabilities is not at the forefront of their minds.
3. Lack of legislation regarding students with disabilities would also suggest that teacher education courses do not focus on Special Education and therefore would graduate a population of teachers that is unable to identify certain disabilities in their students.

The sample of students assessed in the PISA study included those with disabilities. Therefore, the results encompass the entire student body, with the exception of the small percentage of severely disabled students that do not have the capacity to take the test. Although the United States has the most extensive program for students with disabilities, including the most detailed legislation, most disability categories, and largest number of placement alternatives, their scores on the PISA study were much lower in all the subject areas than all the other countries

analyzed. An important factor that differentiates the United States from all the other countries is their inclusion of students with disabilities. In comparison to all other countries investigated, a smaller percentage of students with disabilities are educated in the regular classroom. New Zealand has the same proportion of their students with disabilities educated in the regular classroom, but they only have 1% of their student body actually labeled as having a disability in comparison to the United States' 11%. Therefore, those countries that have a much more prevalent Inclusion Model in their education system performed far better on international comparison assessments.

In comparison to the United Kingdom, Canada, Australia, and New Zealand, the United States has made the smallest effort in providing the students with disabilities an education in the regular classroom environment. As the review of literature and data analysis demonstrate that this is the most effective placement for them, students with disabilities in the United States are at an extreme disadvantage. Although legislative effort is intended to educate them into the regular classroom "to the maximum extent appropriate," it is actually being accomplished much less than the other sample countries (EAHCA, 88 Stat. 773).

Perhaps, if the United States emulated the other countries by focusing a little less on meeting the needs of each individual disability category and decreasing the extent of placement options currently available to them, we would have an educational model that provides those students with the resources and accommodations necessary to be successful in the regular classroom.

Recommendations for Future Study

The results of this study show that a lower percentage of students with disabilities are educated in the regular classroom in the United States than in the United Kingdom, Canada, Australia, and New Zealand. Based on the results, here are the recommendations for future research:

1. There is a definite need for further research in teacher education programs worldwide. The capabilities to identify, teach, accommodate, and feel at ease with students with disabilities are due, at great length, to the existing teacher education programs. It would be informative to make a comparison of the extent to which teachers are trained to work with students with disabilities and the certification needed to do so. It

would also be interesting to ascertain the extent to which general education teachers are exposed to those courses in college. Finally, it would be educationally relevant to ascertain the specific amounts of time in teacher education programs that are dedicated to content relating to the education of students with disabilities.

2. The educational system of countries like Canada and Australia are mandated and regulated in each province and territory. It is recommended that future research examine the provincial legislations of each country and compare how the Inclusion models are put into effect.
3. There was great distinction in the countries studied as to whether their educational system was controlled by the government or by local authority. It would be interesting to analyze the difference in how students with disabilities are educated under both scenarios.
4. Graduating with a diploma is a critical component of future success. It would be important to compare the graduation rates of those students with disabilities educated in the regular classroom with those taught in alternative placements as all effort needs to be made to determine the most effective placements for them.

Closing Remarks

The United States has come a long way in educating students with disabilities, as before 1975 many of them never even stepped foot into an educational institution. Many other countries have, more recently, provided students with disabilities that same right. Although an education is a key aspect to their success, complete segregation is not. Now, it is imperative to see how children with disabilities can be provided with an education that gives them the same access to opportunities that nondisabled people would get. This entails educating them in a more inclusive environment alongside their nondisabled peers. Displaying concern over the less advantaged through legislative efforts is one thing, but putting that concern into action by ensuring their success is another thing altogether.

APPENDIX A: OECD MEMBER COUNTRIES

AUSTRALIA
AUSTRIA
BELGIUM
CANADA
CZECH REPUBLIC
DENMARK
FINLAND
FRANCE
GERMANY
GREECE
HUNGARY
ICELAND
IRELAND
ITALY
JAPAN
KOREA
LUXEMBOURG
MEXICO
NETHERLANDS
NEW ZEALAND
NORWAY
POLAND
PORTUGAL
SLOVAK REPUBLIC
SPAIN
SWEDEN
SWITZERLAND
TURKEY
UNITED KINGDOM
UNITED STATES

APPENDIX B: COMPULSORY SCHOOL EDUCATION

Table 9: Compulsory School Education

	Starting Age	Ending Age
United Kingdom	5	15
Canada (Alberta)	6	16
Canada (British Columbia)	5	16
Canada (New Brunswick)	5	18
Canada (Saskatchewan)	7	16
Australia	6	15
New Zealand	6	15
United States	6	17

Data taken from (OECD, 2003; DfE, 2002; DEST, 2005)

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