Commentary

Access, Participation, and Progress in the General Education Curriculum in the Least Restrictive Environment for Students with Significant Cognitive Disabilities

Anne Smith
U.S. Department of Education*

DESCRIPTORS: general education curriculum, inclusive education

This series of articles illustrates the complexity of policy implementation research in school contexts to inform both the evidence-base and experience-base about access, participation, and progress in the general education in the least restrictive environment for students with significant cognitive disabilities. As I read these articles, my mind raced. I thought about how we conceptualize approaches for school improvement to support teaching and learning and how various people and organizations establish collaborative working relationships. I thought about the large number of people involved in these efforts—students, families, teachers, teaching assistants, principals, school personnel, university personnel, state and local education agency personnel—and how their interests influence support or hinder implementation efforts. How do standards-based curriculum alignment, instructional coherence, systems, and program accountability become a shared vision and a shared responsibility when university researchers forge partnerships with state and local education agencies and school personnel to implement grant-funded activities?

How we configure and deliver educational services to create increased access, participation, and progress in the general education curriculum for students with significant cognitive disabilities and how these efforts become a part of a larger movement toward achieving educational excellence and equity for students who are not considered part of the mainstream student population are important to me. I found these articles provocative and they forced me to examine values and beliefs. This commentary begins with a situated perspective to inform the reader and serves as caveat emptor, then traces 50 years of litigation and legislation regarding

equitable educational opportunities for marginalized students, and finally concludes with observations and parting thoughts.

Situated Perspective–Caveat Emptor

My perspective has been shaped by educational, personal, and professional experiences and social interactions with a diverse array of people across a range of education, residential living, employment, and community environments. Growing up in close physical and social proximity to people who were deaf and people with intellectual disabilities, I learned about parent advocacy and peer interactions as a secondary student volunteer in Arc summer programs. As an undergraduate student in a class with Burton Blatt, we analyzed and discussed Lloyd Dunn's (1968) article, *Special Education for the Mildly Retarded, Is much of it Justifiable?* This was my introduction to assessment, accountability, and program evaluation. Despite the best of intentions, separate special education classes did not demonstrate any greater efficacy than the mainstream classroom. Normalization and social role valorization ideology (Wolfensberger, 1983, 2000) and handicapism (Bogdan & Biklen, 1976) further influenced my thinking about the origin, nature, and design of separate service delivery systems for individuals with disabilities. Disability labels are not benign, some disability labels carry greater stigma than other labels, and the degree or level of involvement of disability is a cofactor in stigmatization and segregation (Smith, 2001). Students who are served under the disability categories of mental retardation, multiple disabilities, autism, and deaf-blindness are less likely than their peers who fall into high incidence categories to spend their school day in inclusive classrooms. This series of articles grapples with how to provide access, participation, and progress in the general education curriculum in the least restrictive environment (LRE) for students who have traditionally been marginalized and segregated, students with significant cognitive disabilities. As a third generation teacher, I

---

*For identification purposes only. The opinions expressed in this article do not necessarily reflect the policy of the U.S. Department of Education and no official endorsement should be inferred.

read these articles and remembered the attitudes and beliefs about teaching and learning and disability of the various parents, teachers, and administrators that I have encountered. I wonder whether and how this research will influence classroom practice.

Fifty Years of Litigation and Legislation Regarding Equitable Educational Opportunities

The unanimous Brown v. Board of Education Supreme Court (1954) decision invalidated state laws requiring or permitting racial segregation in public primary and secondary schools. A decade later, the Elementary and Secondary Education Act of 1965 (ESEA) was enacted to meet the needs of "educationally deprived children" from low-income families through compensatory programs by providing financial assistance to local education agencies. ESEA left a lasting legislative impact by (a) shifting general federal aid to education towards categorical funding connected to national policy initiatives regarding poverty and economic growth; and (b) relying on state departments of education to administer federal funds (and to avoid criticisms of federal interference) and expanding state education bureaucracies by increasing the involvement of state governments in educational decision making (Spring, 1993).

Families whose children were not allowed in public schools filed right to education lawsuits, such as Pennsylvania Association for Retarded Children (PARC) class action suit. The 1971 PARC v Commonwealth of Pennsylvania decree extended Brown by successfully arguing that provisions of Pennsylvania state law allowing schools to exclude children with mental retardation from schooling with their peers violated the equal rights protections of Brown (PILCOP, 2004). PARC litigation shaped P.L 94-142, the Education for All Handicapped Children Act of 1975 (EHA) authorizing the right to a free appropriate public education in the least restrictive environment (LRE) for students with disabilities. To many of us, this LRE provision has served as an "integration imperative" (Gilhool, 1989) because physical presence in age-appropriate schools, classes, and extra-curricular activities is necessary, but not sufficient, to create authentic access, participation, and progress in the general education curriculum for students with significant cognitive disabilities. Experience has taught us that the answers will not be found in the segregation of students of disabilities because (a) all children learn from modeling the behavior of other children, (b) children must attend school together if students with disabilities are to lead a decent life in the community as an adult, and (c) parental and community supervision of schools would ensure equitable resource distribution and greater protection for all students if children with disabilities were educated with their typical peers (Gilhool, 1989). EHA authorized Federal support for a range of activities (e.g., state grants, research and demonstration projects, model development, personnel preparation, parent training, and information centers) across federal, state, and local education agencies and governance structures.

Thirty years ago, the AAESPH Review (1977) published an article about the realization of the LRE principle for students with severe disabilities (Brown et al., 1977). The logic was that students with severe disabilities would be better educated in desegregated environments and segregated service delivery models have at least the following disadvantages:

1. Exposure to nonhandicapped student models is absent or minimal,
2. Severely handicapped students tend to learn "handicapped" skills, attitudes, and values.
3. Teachers tend to strive for the resolution of handicapping problems at the expense of developing functional community-referenced skills
4. Most comparisons between students are made in relation to degrees of handicap rather than to the criteria of nonhandicapped performance
5. Lack of exposure to severely handicapped students limits the probability that the skills attitudes and values of nonhandicapped students will become more constructive, tolerant, and appropriate (p. 198).

The LRE parameters that need to be addressed are as follows: (a) interactions with nonhandicapped age peers, (b) the ratio between handicapped and nonhandicapped students, (c) chronological age-appropriate educational environments, (d) architectural barriers and prosthetized environments, (e) a functional and naturalized curriculum, (f) "normal" organization of the school day, (g) equal access to school facilities and resources, (h) transportation, and (i) ancillary services (Brown et al., 1977).

A persistent theme used to justify placement in segregated educational settings is a litany of diagnostic labels accompanied by a listing of "maladaptive behavioral characteristics" of students may present dangers to themselves and/or others and whose very presence might detract from the learning of other students (Brantlinger, 2001). I was reminded of this familiar refrain when a teacher remarks, "With the high stakes as test scores and student performance is, I think you need to be very careful in that you do not jeopardize the learning of regular education students" (Dymond et al., 2006, p. 30). The great concern of school personnel had about the time consuming nature of the redesign process following one semester of intensive job embedded professional development (Dymond et al., 2006) illustrates the enormous need for schools and universities to forge partnerships to build capacity. It also made me think of all the students and families who have waited for such redesign since 1975.

Technical assistance efforts since 1987 have supported systems change and school inclusion efforts and many

elements described in the two articles implementing interventions in school contexts regarding curriculum development, instructional delivery/organization of learning environments, student participation, and materials and assessment to ensure effective service delivery can be found in the Systemic Change Framework (Ferguson, Kozleski, & Smith, 2001, see Figure 1 and Table 1).

A Nation at Risk (1983) warned about a rising tide of mediocrity eroding the educational foundations of American society as it announced that student achievement in American schools was lagging behind that of student from other nations. Schools did not prepare students with the technical problem solving skills required to compete in this rapidly changing world economy. The report called for education reform and recommended increased support for teaching and learning in English, history, geography, economics, and foreign languages and a commitment to the principle of life-long learning. It also stated that public commitment to excellence and educational reform must be accompanied by a strong public commitment to the equitable treatment of our diverse population because,

> The twin goals of equity and high-quality schooling have profound and practical meaning for our economy and society, and we cannot permit one to yield to the other either in principle or in practice. To do so would deny young people their chance to learn and live according to their aspirations and abilities. It also would lead to a generalized accommodation to mediocrity in our society on the one hand or the creation of an undemocratic elitism on the other (A Nation at Risk, 1983, http://www.ed.gov/pubs/NatAtRisk/risk).

ESEA and EHA have become increasingly aligned during subsequent reauthorizations of ESEA [i.e., Goals 2000, the Improving America's Schools Act of 1994, and the No Child Left Behind Act of 2002 (NCLB)] and EHA (i.e., IDEA 97; IDEA 2004). Browder, Spooner,

Figure 1. The systemic change framework.

minority students will be further disadvantaged (Artiles, 2000). Special education reforms have focused on access and equity but have not adequately addressed the complex issues of exclusion and discrimination at individual or institutional levels nor have they addressed the disability rights movement (Rivzi & Lingard, 1996). Alignment and coherence of education policy, practice, and research will not be complete until the social and educational inequities that currently exist for students of differing abilities and backgrounds are addressed. Segregation, exclusion, integration, and inclusion are highly complex phenomena involving volatile issues of hierarchy, ethics, power, privilege, hegemony, and construction of "the other." In my experience, students who have "significant cognitive disabilities" are part of this "other."

Browder et al. (2006) observe, "The question of the past decade has been whether the omission of academic content for students with significant cognitive disabilities is defensible and if not, to what extend current state standards are relevant" (p. 4). Carter and Kennedy (2006) argue, "This evolution in service delivery is challenging educators to think differently about both where students with disabilities spend their school day and the focus of their educational programming" (p. 3).

Observations

The thick description of a participatory action research (PAR) approach in the article by Dymond et al. (2006) to create a universally designed inclusive high school science course captures the complexity of their task–to change course curriculum, instructional delivery, organization of learning environments, student participation, materials, and assessment by providing working in classes with teachers and teaching assistants. The baseline descriptions of the racially mixed 1500 student school context (e.g., 20% of the students identified as having a disability, 16% of students identified as low income), the three teachers (e.g., 1 general education, 2 special education), and the Unified Science class context (e.g., students with labels of mild disabilities, two students with severe disabilities in a class in which the majority of general education students are "at risk for failure," the class was considered the least challenging in the curriculum, grouping the two students with significant cognitive disabilities together in the back of the room) seem eerily familiar. The authors use PAR to engage school stakeholders in continuous learning to address "real school problems and methods for evaluating the effectiveness of interventions with students" (p. 294) based on the rationale that stakeholder involvement "increases social validity, useful outcomes and determining solutions using both quantitative and qualitative methods" (p. 294). PAR is a very useful tool in supporting educators to explore and refine teaching and learning in their school and classroom contexts.

Carter and Kennedy (2006) acknowledge the importance to peer culture during adolescence—"the general curriculum provides a natural context for peer interaction as students work together on shared learning tasks, providing a meaningful context for acquiring social-related skills, accessing social supports, meeting additional classmates, and developing new friendships" (p. 12). They make a case that "absent well-crafted support strategies, students with severe disabilities may be physically present in general education classrooms, but remain academically disengaged and socially isolated from peers" (p. 4) and present a rationale that use of peer supports (a) increases the number of people monitoring curricular adaptations and (b) ensures the relevance of activities and materials to ongoing classroom instruction. Peer supports readily recognize when a student's instructional activities are not aligned with their own and are adept at identifying appropriate adaptations. I applaud their attention to social validity and contextual fit with the rationale that use of peer supports increases the number of people monitoring curricular adaptations and ensures the relevance of activities and materials to ongoing classroom instruction because "Peer supports readily recognize when a students instructional activities are not aligned with their own and are adept at identifying appropriate adaptations" (Carter & Kennedy, 2006, p. 11).

Peer-mediated approaches have been used to increase learning outcomes and social interactions of students with and without disabilities. This line or research is a structured approach to involving classmates directly in the delivery of educational and social supports using explicit strategies to identify potential peer supports (i.e., with respect to the preferences, educational goals, and individual support needs of students with severe disabilities; the activities in which students will engage; peer interest; and the educational needs of potential peer supports), to establish guidelines (i.e., peers are provided with a rationale for their involvement in delivering support to their classmates, an overview of their teachers' expectations related to this role, and information about how their classmates communicate, interact with their environment, and learn more effectively), and to support classmates with disabilities (i.e., by adapting class activities to facilitate their participation, contributing to IEP goal attainment, supporting behavior intervention plans when appropriate; providing frequent positive feedback; modeling age-appropriate and contextually relevant communication skills; and facilitating interactions with other students in the class). The authors are careful to caution that "like any other form of support, peer-delivered support can be extended in ways that either enhance peers' perceptions of competence or set students apart" (p. 16). To me, the improved academic performance of these peer supports is an example of the reciprocal benefits of how the inclusion of students with significant cognitive disabilities into

general education classes can transform practice and is "value added."

Peer support interventions can also help define roles for paraprofessional support in general education (Cater & Kennedy, 2006). The role of teaching assistants or paraprofessionals is complicated and often overlooked. It is interesting to note that Dymond et al. (2006) did not include the teaching assistants in the pre-intervention professional development and program planning with the teachers and university project personnel. The mantra, "Nothing about me, without me" should guide our efforts and all stakeholders must be involved in creating inclusive and transformed schools.

Parting Thoughts

The importance of school context cannot be overstated. Two articles describe projects implemented in general education classrooms, while the third was implemented in self-contained classrooms. In my experience, the opportunities for students with significant cognitive disabilities to access, participate, and make progress in the general education curriculum are superior in inclusive classes. While there may be qualified teachers using best practice with the best of intentions in segregated classes, there are no opportunities to interact with peers around standards-based instructional content and the age-appropriate expectations and instructional activities in class, school, and extracurricular environments. While the language is dated, the observations of Brown et al. (1977) regarding the problems of segregated schooling are still important.

The impact of randomized clinical trials as "the gold standard" in determining scientifically based research and evidence-based practices is evident in this narrative—"it is important to know the research-based evidence on whether this population can learn academics and if so, the characteristics for effective instruction" (Browder et al., 2006, p. 310). I am reminded of the "educability" and "zero reject" discourse circa 1975–1984. Does this signal that the research and demonstration to date is now relegated to the level of "professional wisdom" because the extant knowledge was not generated using randomized clinical trials? Wolfensberger (1980) questions,

How much "research" or additional research, should be conducted to support normalization implications for attractive environmental reasonably convenient access to services; age-appropriate and culturally valued forms of appearance, labeling, activities, and environmental décor; individualization and intensiveness of programming; avoidance of crowding; competent and image-enhancing staff; warmth of interaction among people; attachment of positive social imagery to devalued people; allowing people to take as much risk as they are capable of coping with; and on and on. These are all prominent nor-

malization implications, and people who want those "proven" or validated will no likely be convinced by evidence anyway (p. 126).

All students have needs–including health and hygiene, nutrition, housing, safety, social emotional needs, stable adult relationships–so they can fully access, participate, and progress the general education curriculum. These students come to schools from a wide range of back grounds, beliefs, and experiences with respect to language, culture, religion, economic status, opportunities, expectations, experiences, abilities, and prospects for post-school life. There is a great need to create individualized learning opportunities and create instructional supports for all students. This has tremendous implications for how we view and describe our efforts to support students with significant cognitive disabilities in the professional literature and public discourse: consider how inadvertent use of terms such as "this population" can set apart and marginalize these students, their families, teachers, classrooms, and schools. We need to transform schools so that they have the capacity to address the needs of all students as we move further into the 21st century. A transformation approach changes the fundamental goals, structures, and curriculum to reveal both the unity and diversity among human beings and acknowledges the benefits of interactions for groups and individuals (Banks, 2001). Butler's (2001) transformation framework establishes nonhierarchical terms and contexts for human interactions; respects the interaction and existence of both diversity and sameness; balances interaction between the individual and the group; and advocates a concept of humanity that is (a) based upon a sense of self that is individually and communally defined and (b) embraces the interdependence of human beings and the world environment as well.

At the 69th Annual Conference of the National Association of State Directors of Special Education, OSEP Director, Alexa Posny, noted that too many students who do not have disabilities wind up in special education and remarked, "This is going to sound like blasphemy, but I almost wish special education would go away. It is not going to go away–we know that–but there are parts that need to fall under general education" (Walton, 2006). Her observation resonates with me. Categorical labels often serve to overshadow individual characteristics and can serve to reinforce negative attitudes and stereotypes (Smith, 2001). This series has done an excellent job of describing three projects funded to investigate access participation and progress in the general education curriculum in the LRE for students with significant cognitive disabilities. This series provides a strong foundation for further discourse about school improvement efforts directed towards students with severe disabilities. It also can serve as a catalyst for renewed discourse as we try to answer the question—

Special education for students with significant cognitive disabilities, is much of it justifiable?

References

A Nation at Risk. (1983, April). Washington, DC: U.S. Department of Education. Retrieved January 2, 2007, from http://www.ed.gov/pubs/NatAtRisk/risk.html.

Artiles, A. J. (2000). *The inclusive education movement & minority representation in special education: Trends, paradoxes and dilemmas.* Keynote paper presented at International Special Education Conference 2000. Manchester, England. Retrieved from http://www.isec2000.org.uk/.

Banks, J. A. (2001). Multicultural education: Characteristics and goals. In J. A. Banks & C. A. M. Banks (Eds.), *Multicultural education: Issues and perspectives* (4th ed., pp. 3–30). New York: John Wiley & Sons, Inc.

Biklen, D., Lehr, S., Searl, S. J., & Taylor, S. J. (1987). *Purposeful integration... inherently equal.* Syracuse, NY: Syracuse University, Center on Human Policy.

Bogdan, R., & Biklen, D. (Producers). (1976). *Handicapism* [A slide tape presentation]. Syracuse, NY: Syracuse University, Center on Human Policy.

Brantlinger, E. A. (2001). Poverty, class, and disability: A historical, social, and political perspective. *Focus on Exceptional Children, 33,* 1.–24.

Browder, D. M., Spooner, F., Wakeman, S., Trela, K., & Baker, J. N. (2006). Aligning instruction with academic content standards: Finding the link. *Research and Practice for Persons with Severe Disabilities, 31,* 309–321.

Brown, L., Wilcox, B., Sontag, E., Vincent, B., Dodd, N., & Gruenewald, L. (1977). Toward the realization of the least restrictive educational environments for severely handicapped students. *AAESPH Review, 2,* 195–201.

Brown v. Board of Education, 347 U. S. 483 (1954).

Butler, J. E. (2001). Transforming the curriculum: Teaching about women of color. In J. A. Banks & C. A. M. Banks (Eds.), *Multicultural education: Issues and perspectives* (4th ed., pp. 174–193). New York: John Wiley & Sons, Inc.

Carter, E. W., & Kennedy, C. H. (2006). Promoting access to the general curriculum using peer support strategies. *Research and Practice for Persons with Severe Disabilities, 31,* 284–292.

Dunn, L. (1968). Special education for the mildly retarded, is much of it justifiable? *Exceptional Children, 35,* 5–22.

Dymond, S. K., Renzaglia, A., Rosenstein, A., Chun, E. J., Banks, R. A., Niswander, V., et al. (2006). Using a participatory action research approach to create a universally designed inclusive high school science course: A case study. *Research and Practice for Persons with Severe Disabilities, 31,* 293–308.

Education of All Handicapped Children Act. Public Law 94-142. (1975).

Elementary and Secondary School Act. Public Law 89-10. (1965, April 11).

Ferguson, D. L., Kozleski, E., & Smith, A. (2001). *On... transformed, inclusive schools: A framework to guide fundamental change in urban schools.* Newton, MA: National Institute for Urban Improvement.

Gilhool, T. (1989). The right to an effective education: From Brown to P.L. 94-142 and beyond. In D. K. Lipsky & A. Gartner (Eds.), *Beyond separate education: Quality education for all* (pp. 243–253). Baltimore, MD: Paul H. Brookes.

Goals 2000: Educate America Act. Public Law 103-227. (1994, March 31).

Hilliard, A. (2004, May 3). Beyond black, white, and Brown: A Forum. *The Nation.* Retrieved January 4, 2007, from http://www.thenation.com/doc/20040503/forum/5.

Individuals with Disabilities Education Act Amendments of 1997, PL 105-17, 20 U.S.C. §1400 *et seq.*

Individuals with Disabilities Education Improvement Act of 2004, PL 108-466, 20 U. S. C. §1400, H. R. 1350.

No Child Left Behind Act of 2001, Pub. L. No. 107-110, 115 Stat. 1425 (2002).

P.A.R.C v. Commonwealth of Pennsylvania, 334 F. Supp. 1257 (E.D. Pa. 1971).

PILCOP Newsletter. (2004, Spring). Philadelphia: Public Interest Law Center of Philadelphia.

Rizvi, F., & Lingard, B. (1996). Disability, education and the discourses of justice. In C. Christensen & F. Rizvi (Eds.), *Disability, human rights, and education: Cross cultural perspectives* (pp. 119–131). Philadelphia: Open University Press.

Smith, A. (2001). A faceless bureaucrat ponders special education, disability, and white privilege. *The Journal of the Association for Persons with Severe Handicaps, 26,* 180–188.

Spring, J. (1993). *Conflicts of interests: The politics of American education.* New York: Longman.

Walton, R. (2006, November 15). *Posny: RTI, a general education initiative has potential for all students.* Paper presented at National Association of State Directors of Special Education 69th Annual Conference and Business Meeting, Williamsburg, VA, LRP Publications.

Will, M. (1986). *Educating students with learning problems–A shared responsibility.* Washington, DC: U.S. Department of Education, Office of Special Education and Rehabilitative Services.

Wolfensberger, W. (1980). Research, empiricism, and the principle of normalization. In R. J. Flynn & K. E. Nitsch (Eds.), *Normalization, social integration, and community services.* Baltimore, MD: University Park Press.

Wolfensberger, W. (1983). Social role valorization: A proposed new term for the principle of normalization. *Mental Retardation, 21,* 234–239.

Wolfensberger, W. (2000). A brief overview of social role valorization. *Mental Retardation, 38,* 105–123.

Editor in Charge: Fred Spooner