

# Inclusion of *All* Students in General Education? International Appeal for A More Temperate Approach to Inclusion

James M. Kauffman, Ed.D.

Professor Emeritus, University of Virginia, Charlottesville, USA

Marion Felder, Ph.D.

Professor, University of Applied Sciences, Koblenz, Germany

Bernd Ahrbeck, Ph.D.

Professor, International Psychoanalytic University, Berlin, Germany

Jeanmarie Badar, Ph.D.

Instructional Assistant, Charlottesville City Schools, Charlottesville, USA

Katrin Schneiders, Ph.D.

Professor, University of Applied Sciences, Koblenz, Germany

## Abstract

Including students with disabilities in general education when appropriate is an important goal of special education. However, inclusion is not as important as effective instruction, which must be the first concern of education, general or special. *Full* inclusion, the claim that *all* students with disabilities are best placed in general education with needed supports, is a world-wide issue. Full inclusion does not serve the best interests of all students with disabilities. Including all students in the common enterprise of learning is more important than where students are taught.

Key Words: Inclusion, Teaching, Placement, Instruction, Judgment, General Education

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### **INCLUSION OF *ALL* STUDENTS IN GENERAL EDUCATION? INTERNATIONAL APPEAL FOR A MORE TEMPERATE APPROACH TO INCLUSION**

Including students with disabilities in general education is an important thing but not, as a football coach once said of winning, “the only thing.” Nor is such inclusion everything or even the most important thing in special education in many nations of the world (e.g., Imray & Colley, 2017—*England*; Ahrbeck, Badar, Felder, Kauffman, & Schneiders,

in press—*Germany*; Anastasiou, Gregory, & Kauffman, in press—*international*; Hornby, 2014—*New Zealand, Australia*; Simpson & Kauffman, 2007—*Portugal*; Warnock, 2005—*United Kingdom*; Yell, Katysiyannis, & Bradley, 2017—*United States*). “The only thing,” if there is such a consideration in special education, is including all students with disabilities in the common project of learning, not including them “under the same roof” (Warnock, 2005, e.g., p. 36).

Illustrating the prominence of inclusion in special education, a professional journal devoted exclusively to the topic was launched in 1997, the *International Journal of Inclusive Education*. In another journal devoted to issues in remedial and special education, Kavale and Forness (2000) provided a history of what has become the inclusion movement, offered a warning that inclusion has become an ideological struggle, and concluded that “a rational solution requires the consideration of all forms of evidence if the best possible education for all students with disabilities is to be achieved” (p. 279). Zigmond, Kloo, and Volonino (2009) described how special education must be seen now in a climate of full inclusion.

*Inclusion* is a word with multiple meanings. English scholars Imray and Colley perhaps best captured the problem of varied definitions and the frequent assumption that it refers to the placement of *all* students with disabilities in general education alongside normal peers:

... educational inclusion despite a constantly changing and liquid definition, has not been achieved in any country under any educational system despite some 30 years of trying. It was no doubt a valiant and laudable attempt to ensure justice and equity but its failure must now be addressed. Inclusion has become a recurring trope of academic writing on education; it is trotted out as an eternal and unarguable truth, but it is neither. It doesn't work, and it never has worked. (Imray & Colley, 2017, p. 1)

Imray and Colley specify the reasons *inclusion* is a dead idea when it is interpreted to mean placing *all* students in general education. They also describe why assuming that the educational needs of literally all students with disabilities can be met in general education is folly. Nevertheless, they end with this statement:

We have suggested that inclusion is dead, but we hope also that this book has pointed towards a new beginning: we want inclusion to redefine itself as a living, breathing thing with real value and real purpose. Not just educational inclusion, but real and meaningful social inclusion, not only for those with SLD [severe learning difficulties] and PMLD [profound and multiple learning difficulties] but maybe also for many, many more for whom the current education system is no longer fit for purpose. Long live inclusion! (Imray & Colley, 2017, p. 102)

In the USA, students with SLD and PMLD would likely be among those with marked intellectual disabilities or multiple and severe disabilities, particularly the students who need intensive supports due to significant problems in communication, self-care, literacy, and numeracy. What Imray and Colley declare dead is the idea of *full* inclusion of *all* students with disabilities in general education. What they would like to preserve is the notion of reasonable, workable inclusion in society outside of school as well as in education.

Inclusion in general education is of secondary importance both conceptually and legally to appropriate, effective instruction—at least in the USA under the *Individuals with Disabilities Education Act*, IDEA (Kauffman & Badar, 2014, 2016; Martin, 2013). The United States law now known as IDEA was originally passed as the *Education of All Handicapped Children Act* (EAHCA) in 1975 (see Martin, 2013, and Yell, Katysiyannis, & Bradley, 2017, for its legislative history). It became best known in the USA as Public Law 94-142, and in 1990 it was renamed the IDEA. The basic requirements of the law have not changed since 1975 (Bateman, 2007, 2017; Yell, Crockett, Shriner, & Rozalski, 2017). IDEA calls for free and appropriate education (FAPE) for all students with disabilities, a written individual education program (IEP) to address the special educational needs of each individual with disabilities, and *subsequent* decision on *placement* of the student in the least restrictive environment (LRE) in which the IEP can be implemented. We emphasize *subsequent* because LRE cannot be determined before the IEP is written (Bateman, 2007, 2017; Bateman & Linden, 2012). We emphasize *placement* because substitution of the word *services* fulfills neither the intent nor the letter of the law (Bateman & Linden, 2012; Martin, personal communication, 2017, July 5).

*Full* inclusion in education (“all means all” or the implication of no exceptions) undermines the meaning of disability in the context of schooling and carries with it the seeds of its own destruction because of its violation of U.S. law and because of its irrationality. Unfortunately, it also threatens appropriate inclusion because its demands are, according to some, unrealistic, unreachable, and phantasmagoric (Ahrbeck et al., in press; Anastasiou, Kauffman, & Di Nuovo, 2015; Hornby, 2014; Imray & Colley, 2017; Kauffman, Anastasiou, Badar, & Hallenbeck, in press; Warnock, 2005).

The inclusion of students with disabilities in general (regular) education (schools and classes) is one of special education's perpetual issues. We have seen the extreme, mindless institutionalization and separation of individuals with disabilities in times past, a history that is both common knowledge among and morally-ethically revolting to all serious students of special education. The extreme ideological commitment to *full* inclusion now being promoted (e.g., SWIFT, 2017, 2018) may reflect an opposite cruelty with inadequate moral-ethical underpinnings.

Inclusion has been an issue in special education in the USA at least since the early 20<sup>th</sup> century (Kauffman, 1981) and seems likely always to be a matter of controversy (Anastasiou et al., in press; Bateman, 1994; Kauffman, 2014). However, inclusion has been a particularly contentious issue in the USA since the late 1970s (see Kauffman, Hallahan, Pullen, & Badar, 2018; Lloyd, Repp, & Singh,

1991) and has become the central special education controversy of the early 21<sup>st</sup> century in many nations of the world (Anastasiou et al., in press; Ahrbeck, 2016; Anastasiou et al., 2015; Ellger-Rüttgardt, 2016; Felder & Schneiders, 2016; Hornby, 2014; Kauffman, Anastasiou, Badar, Travers, & Wiley, 2016; Kauffman & Badar, 2014).

Full inclusion is perhaps the most controversial idea in special education policy and practice today (Kauffman, Ward, & Badar, 2016; Silvestri & Heward, 2016). Full inclusion means, at least in the USA, that *all* students are placed in general education in the regular neighborhood school and *all* supports are provided in that place rather than in special classes or schools. It puts place ahead of instruction, making place of instruction the central issue. Insistence on replacing a continuum of alternative placements with the total inclusion of students with disabilities makes place the first issue. Ironically, the assumption that special education is legitimate only if practiced in a particular place—that place is the most important thing—is one that proponents of full inclusion claim is a great mistake. More than a quarter of a century ago, a proponent of full inclusion wrote the following:

“Place” is the issue. . . *There is nothing pervasively wrong with special education.* What is being questioned is not the interventions and knowledge that has (sic) been acquired through special education training and research. Rather, what is being challenged is the location where these supports are being provided to students with disabilities.

Special education needs to be reconceptualized as a support to the regular education classroom, rather than as “another place to go.” Recent research suggests that what is so wrong about special education is the stigma and isolation that result from being removed from the regular education class for so long. We now have the effective strategies to bring help to the student rather than removing the student from the enriching setting of the regular education class. (Blackman, 1992, p. 29, italics in original)

We agree that what Blackman wrote is true for some students. We believe it is not true for every student with a disability. Furthermore, although we agree with Blackman that there is nothing pervasively wrong with special education (at least as an idea and social project) special and general education are actually different. Zigmond and Kloo (2017) explain why they *should* be different in many ways. Whether they can be practiced in the same place and at the same time with the same students is a question that must be addressed by both data and logic. The research data do not suggest that place is the key issue in making special education what it should be. Neither available research data nor experience nor logical thinking about the education of all children support(s) the conclusion that, as Blackman stated “place is the issue” (Imray & Colley, 2017; Zigmond, 2003). In fact, Zigmond’s analysis (2003) suggests that

much of the research related to inclusion is not only methodologically flawed but asks the wrong question.

### BRIEF HISTORICAL CONTEXT OF FULL INCLUSION

In the early 20<sup>th</sup> century, when special education in the USA was still a relatively new aspect of universal public education, observers noted that special education was necessary to accommodate the variability or diversity in what learners know and need to learn (see Gerber, 2017; Horn, 1924). Diversity or variability among students in *learning* still requires special education and an array of alternative placements to address such variability (Kauffman, 2015b; Kauffman et al., 2018). Since enactment of the federal law in 1975, controversy about what constitutes the LRE requirement and various interpretations related to inclusion have been controversial. The result in the USA has been what Fuchs and Fuchs (1994) have called the full inclusion movement (FIM) (see also Fuchs, Fuchs, Compton, Wehby, Schumacher, Gersten, & Jordan, 2015; Kavale & Forness, 2000).

One reason inclusion has come to overshadow instruction is that educators—teachers and school administrators, like most people—want to feel successful and set tasks for themselves at which they can clearly succeed. Moving bodies can be accomplished with comparative ease and evaluated with considerable objectivity and precision. Many teachers and administrators therefore see inclusion as something they can do and show they have done. Providing good instruction is considerably more difficult than inclusion, and instruction can be evaluated only with far greater subjectivity and far less precision than placement.

All people who work with students who have disabilities, like students themselves, enjoy success and evidence of it that cannot be easily denied. Compared to the appropriate instruction of students with disabilities—with which educators have struggled for decades and for which they have sometimes been criticized virulently—inclusion is much easier, quicker, and provides an argument that social justice has been achieved. The focus on inclusion at the expense of concern for instruction for these reasons is, perhaps, understandable.

Another reason inclusion is seen as important has to do with moral and ethical reasoning and the desire for social justice (Anastasiou et al., in press; Kauffman et al., in press). Social justice is important, but its actual achievement is often difficult, requiring careful consideration of a variety of factors. Perhaps Berg (2003-2004) has provided the most succinct and clearest explanation of the moral and ethical issues in inclusion. The desire for equity is strong, and some have argued that disability should be treated educationally like other forms of diversity, such as parentage or skin color—that separation of students with disabilities from those without disabilities for any reason, is, like slavery and racial segregation, immoral (e.g., Stainback & Stainback,

1991). But, then, there is the matter of fairness, the ethical treatment of differences directly related to education.

Two general philosophical positions regarding inclusive education have moved to the forefront of special education discourse since the promulgation of the right to non-discrimination based upon disability. One is a moral doctrinal position advocating full inclusion and contending that integration is necessary to maintain universal norms of nondiscrimination. The other is an ethical position advocating partial inclusion. This latter position argues that exceptional students should receive accommodations specific to their individual needs through a combination of general classroom instruction and specialized instruction within segregated settings. Taken to their individually reasoned ends, these two philosophical approaches represent opposing ideological views and suggest a largely irresolvable debate regarding how exceptional students are best served. (Berg, 2003-2004, p. 1)

In our opinion, true social justice for all individuals with disabilities and their families is not achievable when only a single placement or educational environment is available, whether that be an institution, separate school or class, or general education. Restructuring public education such that only a single kind of placement is available, regardless of what that placement is, may provide the *image* of social justice. However, the actual *achievement* of social justice is an entirely different matter. Czech-born French writer Milan Kundera (1990) coined the term *imagology* to refer to the assumption that image is more important than reality, that the image one projects or calls to mind is more important than any objective truth. Our belief is that although social justice in education is extremely important, the promotion of *full* inclusion rests on imagology, not the ethical, fair treatment of all students in schools, not on realities.

### THE WORLD-WIDE PROBLEM OF INCLUSION

Full inclusion in the 21<sup>st</sup> century continues to be a problem world-wide, partly because of uncertainty about the exact meanings of “inclusion” and “full inclusion” (see Ahrbeck, 2016; Ahrbeck et al. in press; Anastasiou et al., in press; Anastasiou et al., 2015; Felder & Schneiders, 2016; Hornby, 2014; Imray & Colley, 2017). Also, it is a problem in part because of disagreement about how students are best grouped for effective instruction (see Kauffman, 2011; Kauffman, Landrum, Mock, Sayeski, & Sayeski, 2005; Kauffman, Mock, Tankersley, & Landrum, 2008). Those calling for inclusion obviously favor heterogeneous grouping based on the student variables directly related to instruction (i.e., present level of functioning in whatever is being taught). Greater heterogeneity of students in learning of whatever is being taught makes teaching more difficult, such that at some point an increase in heterogeneity of learning exceeds a teacher’s ability to offer effective instruction for all students in the class. This is not

something that has been or is likely to be based on abundant, scientific experimentation with grouping but a logical conclusion based on what we know about effective instruction (see Engelmann & Carnine, 2011; Grossen, 1993; Kauffman, 2011, 2015a; Pullen & Hallahan, 2015).

*Full* inclusion can be seen as being particularly unaware of the diversity of teachers as well as students, as it implies the expectation that *all* teachers provide effective instruction for *all* their students when they simply cannot, creating conditions under which teachers’ failure to provide effective instruction for all their students is inevitable. Ironically, full inclusion advocates, who espouse recognition of diversity and deliberately increase heterogeneity in the learning of students in a class, seem oblivious to the diversity among teachers in their ability to deal with heterogeneity in learning. They seem unwilling to face the reality that very few teachers, if any, are capable of teaching extremely heterogeneous groups of students well or as effectively as full inclusion advocates expect (Imray & Colley, 2017; Kauffman & Badar, 2016).

Aside from the instructional issues involved in full inclusion, there is the matter of some nations’ laws. In the USA, regulations governing IDEA demand a continuum of alternative placements (U. S. Department of Education, 2018). Furthermore, a federal court of appeals has found full inclusion to violate IDEA (Bea, 2016). Nevertheless, the U. S. Department of Education (USDOE) has funded at least one full-inclusion project, SWIFT— School-Wide Integrated Framework for Transformation (SWIFT, 2017, 2018). Thus, the USDOE seems to be ignoring its own legal requirements (see Kauffman & Badar, 2016). Italian law may call for full inclusion, but regardless of the law such inclusion seems not to have occurred in practice in Italy (Anastasiou et al., 2015). Warnock (2005), an early and outspoken advocate of inclusion in the United Kingdom, has noted the unreasonableness of advocating the inclusion of *all* students in general education or, as she puts it, placing all students “under one roof” (p. 36). In Germany, the abolishment of special schools and any special setting within general education is demanded by many full inclusion proponents, even though this demand is incompatible with the constitution (*Grundgesetz*), as it impedes parental choice and the educational sovereignty of the German states (*Bundesländer*) (see Ahrbeck et al., in press).

Legal problems do not end with the nations mentioned as examples. The United Nations’ *Convention on the Rights of Persons with Disabilities* (CRPD), Article 24, suggests that education should have the goal of full inclusion (Anastasiou et al., in press; Kauffman, Anastasiou, Badar et al., 2016). Thus, federal law in the USA clearly proscribes full inclusion, and the CRPD, (if “full inclusion” retains its meaning in the USA) is in conflict with extant law in the USA and other nations.

Full inclusion may have meanings or implications for education in some nations that the term does not have in the USA. Nevertheless, it is worth noting that special educators and various disability groups did not participate in the choice of wording for Article 24 of the CRPD. This lack of consultation with individuals and groups includes those that do not subscribe to the notion of full inclusion in education (Anastasiou et al, in press; Kauffman, Anastasiou, Badar et al., 2016). Moreover, education in some nations is backing away from the notion of full inclusion as that term has been interpreted in the USA (e.g., the United Kingdom; see Imray & Colley, 2017; Warnock, 2005), and some have discovered that *full* inclusion is difficult or impossible to implement in reality (see Anastasiou et al., 2015; Ahrbeck, 2016; Ahrbeck et al., in press; Felder & Schneiders, 2016). Furthermore, the CRPD does not focus on the most important element of special education for students with disabilities—*special, individualized instruction that meets the needs of individuals regardless of where they are placed*. Very regrettably, the CRPD casts human rights involving education as place-related, not instruction-related (Anastasiou et al., in press; Kauffman & Badar, 2014).

At this point we may conclude that there is no commonly accepted definition of inclusion, much less *full* inclusion (Imray & Colley, 2017; Terfloth 2013), that special educators and others in all nations understand and accept. An ideological extreme existing in some nations, including the USA, is commitment to *full inclusion*, meaning that *all* students must be taught together in one class and that *all* special placements and categories of disabilities (labels) must be abolished (see Hinz, Korner, & Niehoff, 2010; Jennessen & Wagner 2012; Kauffman et al., 2016; Sailor, 2009; Sailor & McCart, 2014; Sander 2003; Wocken 2012). However, there is a more moderate understanding of inclusion as best practice, meaning placement in general education with supports *when that is most appropriate*. This more moderate interpretation of inclusion is committed to education and habilitation meeting the needs of learners with disabilities—inclusion when general education is the best placement and alternative placements when it is not (Hillenbrand 2016; Hornby, 2014; Imray & Colley, 2017; Kauffman et al., 2016; Simpson & Kauffman, 2007). The thinking is less concerned with institutions and places and focused more on the educational needs and strengths of individuals. Specialized, dedicated placements are not always rejected. Instead, the goal is that each child, regardless of ability or disability, should be included in education in a place appropriate for and dedicated to her or his needs (Gliona et al., 2005). From this perspective, we must have further investigation of what is most beneficial for whom. Empirical evidence in answering these question is of fundamental importance in making special education a scientific endeavor (Kauffman, 2011; Kauffman & Anastasiou, 2016; Kauffman, Anastasiou, Badar et al.; Kauffman, Anastasiou, & Maag, 2017).

## SUPPORTS PROVIDED FOR INCLUSION— EDUCATIONAL TIERS AND CO-TEACHING

In the USA and some other nations, advocates of full inclusion often say their vision of inclusion is possible *when all special services are made part of an appropriate framework* or basic plan for dealing with the education of all students in general education. That is, the appropriate framework provides differing levels or tiers of intensity of intervention or instruction provided as an integrated part of general education rather than as a separate special education structure or program. These alternatives to education's traditional general/special division have been known by a variety of names, including response to instruction (or intervention; RtI), positive behavioral interventions and supports (PBIS), and multi-tiered systems of supports (MTSS). That the tiers, whether known as RtI, MTSS, PBIS or other description or acronym are essentially the same idea, plan, or framework expressed in slightly different ways was clarified in a letter of the USA's Office of Special Education and Rehabilitative Services (OSERS):

For those students who may need additional academic and behavioral supports to succeed in a general education environment, schools may choose to implement a multi-tiered system of supports (MTSS), such as response to intervention (RTI) or positive behavioral interventions and supports (PBIS). MTSS is a school-wide approach that addresses the needs of all students, including struggling learners and students with disabilities, and integrates assessment and intervention within a multi-level instructional and behavioral system to maximize student achievement and reduce problem behaviors. (Yudin, 2015)

Such frameworks or structures of support in general education seem at first thought to have great merit, and tiers have often been recommended as a way of restructuring general and special education (see Gage et al., 2010). In fact, tiers are in many ways a fine idea. However, they all seem to lack convincing research evidence that they are, in fact, the best option for *all* students (for comments on RTI in general, see Johns, Kauffman, & Martin, 2016; Kauffman, Badar, & Wiley, in press; specific to emotional and behavioral disorders see Kauffman, Bruce, & Lloyd, 2012). Such frameworks may violate the structures necessary for vibrant special education (cf. Kauffman & Hallahan, 1993). Furthermore, advocacy of such plans or frameworks may be premature alternatives to the one codified in the USA in 1975 as the IDEA, which has been called a solution hiding in plain sight (Cannon, Gregory, & Waterstone, 2013). Furthermore, they seem logically to multiply the problems inherent in having special education, requiring more of the very things for which special education has been criticized and found wanting (Kauffman, Anastasiou, & Maag, 2017).

Special education is criticized because it involves *sorting, labeling, stigma, arbitrary criteria for identification,*

*disproportionality, false identification, waiting to see students fail before intervening, high cost, failure to cure disabilities, different curriculum, instruction in a special place, homogeneous grouping, etc.* But, every single one of those criticisms applies just as much to every tier in any alternative (to IDEA) framework. That is, the more tiers, the more all of these problems will occur; to determine what tier is most appropriate for a given student, students must be sorted, and all the other problems follow. (Kauffman, 2016, pp. 359-360)

Finally, we note that research to date does not support all of the claims for them (e.g., O'Connor, Sanchez, & Kim, 2017) and that some iterations of such plans (e.g., MTSS in the state of Iowa) may have run afoul of the U.S. law known as IDEA when they have been adopted as a standard operating procedure for all students (e.g., Ryan, 2017). In fact, the matter of placement is a matter in which empirical evidence is lacking or suspect on methodological grounds (Zigmond, 2003).

Besides the tiered plans known as RtI, MTSS, PBIS, et cetera, the extra resources brought to students in general education often involve the idea of co-teaching, having general and special education teachers work together in the same classroom. Co-teaching, like tiered systems of education, is a fine idea that sometimes can be made to work. The idea is that by pooling their knowledge and talents, the two teachers are able to see that all students in the class are well instructed. Undoubtedly, this is sometimes the case, but Cook, McDuffy-Landrum, Oshita and Cook (2017) concluded that the empirical research supporting co-teaching is both sparse and inconclusive. Furthermore, as Imray and Colley (2017) argue on the grounds of experience and logic, no such co-teaching can meet the educational needs of some students.

We insert an important and easily misunderstood caveat here: *Some proponents of RtI, MTSS, PBIS, other tiered approaches to education and co-teaching do not also support the notion of full inclusion.* That is, some proponents and researchers recognize that these configurations do not serve literally *all* students best. They recognize that tiers are promising ways of improving both general and special education but have limits that require judgment in individual cases. In fact, they recognize the reality that some students with disabilities are better served in special classes or schools dedicated to special educational needs that are unlikely to be met by any tier of general education.

Nevertheless, tiered education (e.g., MTSS, PBS, RtI) is also invoked by proponents of full inclusion to buttress their claim that *all* is to be taken literally, meaning there are no exceptions or, at the least, that exceptions are not mentioned (cf., Sailor, 2009; Sailor & McCart, 2014; SWIFT, 2017, 2018). Proponents of full inclusion are apparently fearful that using words like *many* or *most* allow mistakes of judgment. These proponents avoid the reality that a literal interpretation of *all*, disallowing judgment, is

highly problematic. The problems created by disallowing judgment occur with every extremist ideology, regardless of its content (e.g., alcoholic beverages, abortion, guns, religion, politics, legal sentences, policing, disability).

The basic problem involving judgment versus application of an invariant rule or consequence is this: allow judgment, and some judgments will be outrageously bad; disallow judgment, and some applications of the invariant rule will have outrageously unjust consequences. We have seen this play out in the legal system with the notion of mandatory or uniform sentences. True, judges sometimes use bad judgment. However, when judges are not allowed to use discretion and take mitigating factors into account, defendants sometimes receive grotesquely unfair sentences. We have seen it play out in schools with the notion of zero tolerance. True, administrators sometimes have used very bad judgment in disciplining students. However, when administrators are not allowed to use discretion and take mitigating factors into account, students sometimes have suffered outrageously inappropriate punishment. Perhaps equally important in all such cases of disallowing judgment is the difficulty or even impossibility of correcting the errors and suffering that accompany prohibition of judgment.

Our concern is that in the matter of inclusion, allowing educators to use judgment in deciding whether to include or not include a student allows errors of judgment. However, not allowing judgment guarantees that some students will be included when that is not the best option. Moreover, with the elimination of alternatives comes the impossibility of correcting errors because alternative placements do not exist. Logically, allowing judgment allows error, whereas not allowing judgment precludes actual social justice in some cases. At least allowing judgment—exceptions to the inclusion rule—maintains the *possibility* of making no mistakes and the *possibility* of correcting mistakes when they do occur—so long as alternative placements exist.

## CONCLUDING COMMENTS

We might ask whether the idea of full inclusion is merely a different orientation toward special education or whether it represents the end of special education as we have known it (Hinz, 2009; Kauffman, Anastasiou, & Maag, 2017). Full inclusion seems to be intent on abolishing special schools and classes, with very few exceptions, if any at all, and to substitute an entirely new concept. Sailor (2009) wrote, “I recommend operating schoolwide RTI models without having any separate special education classrooms” (p. 123).

*Full* inclusion seems to be based on a reconceptualization of the nature of disability, to promote the idea that disability is far less unwelcome than it first appears, perhaps even desirable (see Kauffman & Badar, 2017). Many or most of those with disabilities are not well served by mere social acceptance or small, easily accomplished variations in

instruction. They need, in most cases, special support and education that others do not need—special education that increases their options in life. Disability typically means a special restriction in life, even though this is not often admitted (see Anastasiou & Kauffman, 2011, 2012, 2013).

Perhaps tellingly, even tiered programs of education that are not considered *fully* inclusive by full inclusion advocates have come under suspicion. Schumann (2013) claims that RtI works as a stigmatizing labeling process in the disguise of preventative intervention. She called RtI a “Trojan Horse” that undermines inclusion and, therefore, prevents it. Similar sentiments can be found in the USA as well: “RTI is not so much a reform but a tactic, aimed at returning to the status quo of segregated special education and reinvigorating many of the foundational assumptions of traditional special education practice” (Ferri, 2012, p. 864). *Segregated* is a pejorative frequently used by proponents of inclusion to describe special education outside the general education classroom, but *dedicated* may more accurately describe it (Gliona, Gonzales, & Jacobson, 2005).

In Germany, efforts to de-categorize and merge education disciplines and to reduce or eliminate special education in favor of *inclusive education* are very great concerns. They lead eventually to trivializing disability and reducing the quality of special education (Ahrbeck 2012, 2016; Felder & Schneiders, 2016). Even though full inclusion is currently popular with many politicians, administrations, educators, scientists, and even some people who themselves have disabilities (see Anastasiou & Kauffman, 2011, 2013), it is quite important to maintain a critical attitude toward the limits of what is both possible and desirable. At the center of concerns should be the wellbeing of the individual, and it is doubtful that in every case he/she is best served by inclusion in general education. Giving up the lofty ideals embodied in full inclusion ideology may be painful, but inevitably the idea of inclusion must comport with life’s realities. Eventually, the success of inclusion will depend on what can be achieved in the daily practice of teachers working with children, not on a call for human rights untethered from realities (Kauffman et al, in press; Tenorth, 2011).

Insistence on *full* inclusion in education—requiring placement in general education in *all* cases or for *all* students rather than considering individual needs and putting effective instruction first—carries the seeds of failure found in any other form of extremism (Kauffman et al., in press). Our greatest fear is that *full* inclusion will be such a disastrous failure that we will return to the needless exclusion of children because the movement toward inclusion went too far, becoming so radical that it created a predictable, unfortunate abandonment of a more tempered approach.

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## CORRESPONDENCE

Direct correspondence to James M. Kauffman, [jmk9t@virginia.edu](mailto:jmk9t@virginia.edu).