

Comparison of Special Education in the United States, Korea, and China

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Abstract

Given the contextual conditions in each country, the United States, Korea, and China all have their own unique history of special education, which leads to different special education and service systems for students with special needs. The purpose of this paper is to compare the development and current status of special education in all three countries. The researchers did a comprehensive literature review primarily using the database of Academic Search Complete, in addition to national journals, published governmental reports, and official documents from Korea and China. The results of this review provide a better understanding of special education and trends in special education across all three countries.

Keywords: special education, history, the United States, Korea, China

Introduction

Historically, American special education is considered to have been initiated when Howe and Gallaudet started to educate those who were blind and deaf in the early 1800s. Since then, special education has seen tremendous development (Friend, 2013). In particular, the civil rights movement in the 1960s had a critical influence on federal legislative establishment to ensure education services for children with special needs. The most recent inclusive education movement in the United States has emphasized access to equal educational opportunity and a commitment to meet individual needs (Meyer & Patton, 2001).

While supported via numerous litigations and several legislative amendments, American special education also has significantly influenced the development of special education in other countries as well. This comparative study addresses the influence on two countries, Korea and China. Also, this study discusses how these influences have yielded different outcomes due to the different cultural, social, political, economic, and religious backgrounds in both countries.

In Korea, American missionaries first initiated special education in the late 1800s. However, due to the heavy influence of Buddhism and Confucianism in Korean society, only private residential special schools influenced by the Christian missionaries supported the students with special needs until the Special Education Promotion Act (SEPA) was enacted in 1978 (Taegu University Special Education Center, 1993). This national special education law was influenced by American special education law, P.L. 94-142, from 1975. Major influences of P.L. 94-142 on the SEPA were individualized education plan (IEP), mandated evaluation process for special education and delivering IEP in public schools (Taegu University Special Education Center, 1993).

Even though China is geographically adjacent to Korea, it also has a unique historical development of special education due to its own social and political standpoint. Historically, children with special needs did not receive any form of special education nor even general education in China. While China also had Western missionary activities during the same time period as Korea, their influence in special education was not significant in comparison. China formally started special education in 1986 when the National People's Congress adopted the 1986 Compulsory Education Law of the People's Republic of China (Worrell & Taber, 2009). However, most children with special needs had not been served in public schools due to economic and social issues until the early 1990s. Due to the influence of inclusion in the United States, originating from the Least Restrictive Environment (LRE) in American special education law, Individuals with Disabilities Education Act (IDEA) in 1990, the Learning in the Regular Classroom (LRC) movement grew in popularity and saw rapid increase of the population of students with special needs in China from the early 1990s onwards (Ellsworth & Zhang, 2007).

One of the significances of this study is that no previous studies have reviewed the influence of American special education on both Korea and China. Most studies for special education history in both countries have reported only on the history of special education in both countries, not American influence on the same. However, no studies have looked at how the second half of the 20th century had significant changes in their special education history and how these changes were aligned with or transferred from American special education history by reviewing the timeline of changes. This study also highlights how American special education saw a different

influence because of the contextual conditions in both countries historically, such as spreading out the concept of inclusion, equality, and dignity for those with special needs. Furthermore, this study provides the current status of special education in both countries compared with the US, such as different levels of protection for parental rights.

Since this is a literature review-based study, the authors researched traditional formal narrative literatures, and synthesized the search. As a comparative examination of trends in special education across three countries, out of necessity, the historical sources used in this study are primarily the works of secondary scholarly literature from ERIC, in addition to national journals, published governmental reports, and official documents in both countries of Korea and China. The official documents include, but not limited to, the Korean National Institute for Special Education, the National library for Individuals with Disabilities, Taegu University Special Education Research Center, and Beijing Federation for People with Disabilities, National People's Congress, and National Education Committee of the People's Republic of China.

This paper addresses the comparisons of special education in three countries into two major timelines, by the mid-20th century and after the mid-20th century. Prior to the mid-20th century, special education systems in three countries had been developed as mainly religious, philanthropic, or private sector activities instead of government-led legislative activities (Kim & Yeo, 1976; Osgood, 2008). Then, from the 1960s, special education laws have established and influenced the development of systematic public special educations in three countries. After the historical comparison, this paper briefly compares the current special education status in these three countries.

Special Education Development by the Mid-20th Century in Three Countries

As mentioned above, until the mid-20th century, the educational environments for children with special needs were not systematically structured, particularly in public education systems, in three countries. However, the efforts to make educational supports for them had been implemented by religious or private philanthropic activities. Also, importantly, the influence of American missionary groups on special education in China and Korea has been identified from early 1800s (Kim & Teo, 1976; Mou, 2006) as Table 1 presents. This paper also discusses the influences while describing special education history in each country.

Table 1

Historical Milestones of Special Education by the Mid-20th Century in the United States, Korea, and China

Year	The United States	Korea	China
1817	Connecticut Asylum for Deaf & Dumb Persons: the first school for the deaf	--	--
1832	Perkins Institution for the Blind: the first school for the blind	--	--
1864	National College (Gallaudet University)	Deaf Mute (Gallaudet University)	--

1874	--	--	Moore, a Scottish missionary, established the first special school for the blind
1875	First special class in Cleveland, Ohio	--	--
1877	--	--	The Mills, American missionaries, established the first school for the blind and deaf
1894	--	Hall, an American missionary, educated a girl with blindness	--
1909	--	Hall established a school for the deaf	--
1912	--	--	Zhang, the first Chinese, established a training school for teachers of the blind and deaf
1927	--	--	The government established Nanjing Municipal school for the blind and deaf
1935	--	Kwang-Myoung Blind School, the first private special school	--
1940s	--	Multiple Special Schools for Different Special Needs	Laws and regulations for people with disabilities were made in 1950s; 266 special schools by 1965
1960s	--	--	--

The United States of America

Special education in the United States has been influenced by social and economic factors, but the most important factor has been the legislation and major court cases which directed its development. In the 19th century, the idea of supporting children with disabilities came to the United States from Europe; France to be specific. Children with deafness and/or blindness were the first group who received special education services, followed by children with intellectual disabilities (Friend, 2013). In the timeline of the development of special education services described by Friend (2013, p. 8), for children with deafness and/or blindness, Connecticut Asylum for the Education and Instruction of Deaf and Dumb Persons opened in 1817. Samuel Gridley Howe opened Perkins Institution for the Blind in 1832, and then established an experimental school for 'feebleminded' youth in 1848. The National Deaf Mute College was established in 1864, which was renamed later as Gallaudet University.

The first special class in public school was established in Cleveland, Ohio, in 1875, but was disbanded shortly afterwards (Scheerenberger, 1983; Friend, 2013, p. 7). During the late 19th and early 20th centuries, changes in the society and economy such as urbanization, immigration, and industrialization led to the growth of compulsory public education (i.e., mandatory school attendance) and assembly line of standardized education (i.e., moving from grade to grade) (Friend, 2013, p. 8). In the first half of the 20th century, however, when people found that not everyone could make appropriate progress within the system of standardized education, it became more common for students, especially those with intellectual, behavioral, physical, and sensory disabilities, to be educated in the special classes separating from their typically developing peers (Friend, 2013, p. 9). Until the 1950s, it was a common practice for students with disabilities to be excluded from attending public schools, or for those who did attend the public school, many of them ended up dropping out. For students with more severe disabilities, they were either institutionalized or remained at home (Pardini, 2002; Hill & Sukbunpant, 2013).

Korea

Before mentioning about the history of special education in Korea, education in general in this country needs to be discussed first. Korea is one country in Asia that is well known for strict and high emphasis on education. Several historical backgrounds have influenced the heavy emphasis on education. During the Choson Dynasty period (1392 – 1910), the last dynasty before the democratic governmental system came into effect, education was the best way for Koreans to become higher-ranking government officers and, to a certain degree was the only way to overcome hierarchical social status; one which was predetermined from birth (Seth, 2005). During the period, Confucianism from China also had a strong influence on the perceived value of education as well. ‘Koon-Sa-Boo-Il-Che’ is a very famous Korean proverb which means a king (Koon), a teacher (Sa) and a father (Boo) are the same people (Il-Che) to be respected. This shows how much Korean people have respected educators and considered education as one of the most important aspect of life (Chung, 1985). Another well-known Korean saying is “Mangja's mom moved three times for her son's education” (Anonymous, n.d.). This means parents are willing to move anywhere for better educational environments for their children.

In terms of special education, even though people have strongly valued education for more than two centuries, people with disabilities were not considered a priority for education in Korea. They were only considered from a motive of sympathy, charity, or protection. On the other hand, people with disabilities were also neglected, ridiculed, or disregarded because disability itself was considered to be karma for sins committed in previous lives, as believed in the Buddhist world view (Kang, 2002). Due to these perspectives toward people with disabilities, only certain job trainings or humanistic social supports were given to them in history until the end of the Choson Dynasty, and even then, only occasionally (Kim, 2010).

Meanwhile, Korean society - including the education system - underwent a major change when the country opened its doors to western culture in the late 18th century. From this period onwards, special education history can be divided into four stages according to Kim (2010): (1) emerging special education; (2) establishing special schools; (3) establishing special education laws; and (4) full inclusion practice.

The first stage was the period of emerging special education which lasted until the 1930s. During this stage, as a part of western influence, foreign missionaries brought in a new education system including educational approaches for people with disabilities. Particularly, Rosetta Sherwood Hall, an American missionary and a doctor, was known as the first person to initiate special education in Korea by educating a girl with blindness in the Braille language in 1894 (Kim, 2003). The education setting for the girl was a special classroom in a private school. She also established a school for children with deafness in 1909 (Kim & Yeo, 1976). Also, the Kwang-Myoung Blind School was established by Pastor Chang-Ho Lee in 1935 as the first special school by a Korean which was almost a century after the first special school was established in the U.S. Since then, students with special needs were educated mainly in segregated private residential special schools under Christian philanthropy activities (Kim, 1983).

The second stage was the period of establishing special schools, mainly private residential schools and several special classrooms in public schools from the 1940s to 1960s. The majority of special schools in special education history were found in this stage such as Bo-Gun School for the physical disabled, Bo-Myoung School for the cognitively disabled, and Young-Hwa School for the deaf in Daegu, Korea (Kim, Yeo, 1976). During these three decades, two federal education laws had addressed the integration of students with special needs into public schools, but it was hardly practiced in the field due to lack of legal regulations (Ku, et al., 1994).

The People's Republic of China

Special education in China has been heavily influenced by traditional philosophies, as well as social and economic factors. Not until the past 30 years since the late 1980s has China seen more legislation, policies, and regulations established to guide the development of special education. More than two thousand years ago, there existed a sympathetic attitude toward people with disabilities in Chinese society, influenced by traditional philosophies and religions such as Confucianism, Buddhism, and Taoism and so on. People were encouraged to be kind and help individuals with disabilities. However, without an established support, it usually became the individual families' responsibility to support family members with disabilities (Deng, Poon-McBrayer, & Farnsworth, 2001).

Emergence of Special Education in China Prior to 1949. Special education in China first emerged in the mid-19th century. In 1859, during the period of "Tai Ping Tian Guo" (Taiping Heavenly Kingdom), in his masterpiece of "Zi Zheng Xin Pian" (New Treaties on Political Counsel), Hong Rengan systematically introduced how to develop special education schools and how to legislate special education in China. Unfortunately, his idea on special education was never implemented because of the failure of the Taiping Heavenly Kingdom movement (Huang, 1994). In the 19th century, similar to, but much earlier than Korea, the U.S. and European missionaries supported the establishment of special schools in China. In 1874, a Scottish minister, Mu Weilian (William Moore), established the first special school for people with blindness in Beiping (now Beijing city) (Mou, 2006, p. 38). This was about six decades after the first American special school. Also, in 1877, the American missionaries Charlie and Annetta Mills established the first school for students with deafness and blindness in Dengzhou, Shandong province (now Penglai county) (Mou, 2006, p. 38). Zhang Jian was the first Chinese individual to establish a training school for teachers of the blind and deaf in 1912, and then a

special school for blind and deaf students in 1916 (Deng, Poon-McBrayer, & Farnsworth, 2001). In 1927, the government established the Nanjing Municipal School for the Blind and Deaf. Due to continuous wars that lasted for years, before the foundation of the People's Republic of China, there were only 42 special schools serving about two thousand students with blindness and deafness nationwide, mostly run by religious and charitable organizations (Deng, Poon-McBrayer, & Farnsworth, 2001, p. 290; China Disabled Persons Federation, 1996).

Progress in the 1950s and Regression Prior to the 1980s. After the founding of the People's Republic of China in 1949, the Chinese government initiated systematic reforms in special education, based on the socialist humanitarian ideology and perspectives from the Soviet Union. The previously existing schools for the blind and deaf were now owned and run by the state (Jiang, 1986; Deng, Poon-McBrayer, & Farnsworth, 2001, p. 290). In the 1950s, laws and regulations were made to safeguard the rights of education for people with disabilities. The Resolutions on the Reform of the School System (1951) clearly regulated that governments at all levels should establish special schools for the deaf and blind, and educate children, youth and adults with disabilities (Yang & Wang, 1994; Deng, Poon-McBrayer, & Farnsworth, 2001, p. 290). In 1953, the Ministry of Education established the Department of Education on the Blind and Deaf-Mute, which was responsible for making plans, training teachers, and guiding the education for the blind and deaf nationwide. At the same time, the new blind word program and the Chinese finger alphabet program became supplementary means of special education, which promoted the development of Chinese special education (Deng, Poon-McBrayer, & Farnsworth, 2001, p. 290). In 1965, there were 266 special schools serving about 22,850 students with hearing and visual impairments (China Disabled Persons Federation, 1996, p. 56). However, political turmoil in the following 10 years led to neglecting education, including special education.

Special Education from Late 20th Century in Three Countries

From the late 20th century, three countries started to establish federal special education laws as Table 2 presents. Due to legal systems, these special education systems have been more structured and centralized, particularly in public school sectors. Also, the authors identified unique patterns of legal developments in Korea and China which are influenced by American legal systems at different levels. In this section, the paper compares the legislative changes in three countries in terms of similarities and uniqueness.

Table 2
Major Legislation in the United States, Korea, and China

Year	The United States	Korea	China
1973	Section 504 of Rehabilitation Act	--	--
1974	Education for All Handicapped Children Act (EAHCA)	--	--
1975	Education of the Handicapped Act (EHA)	--	--
1977	--	Special Education Promotion Act (SEPA): Public Education, IEP	--

1982	--	--	Article 45 of the Constitution of the PRC: First fundamental law mentioned special ed.
1986	--	--	Article 9 of the Compulsory Education Law of the PRC: Mandated 9-year compulsory education for all students
1988	--	2 nd SEPA: FAPE	--
1990	Individuals with Disabilities Education Act (IDEA)	--	Guidelines for the Development of Special Education & Law on the Basic Protection of Individuals with Disabilities: Expanded the scope of disabilities
1992	--	--	The Detailed Regulations on the Implementation of the Compulsory Education: Standards and procedures for special school establishment
1994	--	3rd SEPA: Inclusion, Transition Plan	--
1997	--	4 th SEPA: LRE	--
2004	Individuals with Disabilities Education Improvement Act	--	--
2006	--	--	The Compulsory Education Law: Rules and regulations on special ed.
2007	--	Special Education Law for Children with Special Needs: Inclusion in Gen ed. Schools	--
2014	--	--	The Special Education Promotion Plan: Increased funding to support special ed.
2015	--	--	The Special Education Teacher Professional Standards (Trial 2015): National professional requirements for qualified special ed. teachers

The United States

During the Civil Rights movement of the 1950s and 1960s, the landmark case *Brown v. Board of Education* (Brown) (1954) ruled that it was illegal to separate children by race in separate schools without access to similar resources (Hill & Sukbunpant, 2013). Also, the Elementary and Secondary Education Act of 1965 (ESEA 1965) was the first federal legislation to address the education of children with disabilities, and it provided federal funding for the states to create and

improve educational programs and related services for children with disabilities (Turnbull, Stowe, Wilcox, & Turnbull, 2000; Friend, 2013, p. 11). Section 504 of the Rehabilitation Act (1973) protects all individuals with disabilities from discrimination in federally funded programs, yet it does not provide any federal funding for the implementation of that protection (Friend, 2013, p. 16). The impacts of Section 504 to today's public schools are that students who are not eligible for Individuals with Disabilities Education Improvement Act (IDEIA, 2004) may receive special education and related services in public schools through Section 504, and the schools need to provide funding for its implementation (Friend, 2013).

The Education for All Handicapped Children Act (EAHCA) (1974) was the first federal legislation to mention providing students with disabilities with a free appropriate public education (FAPE) (Friend, 2013; Witte, Bogan, & Woodin, 2015). The Education of the Handicapped Act (EHA) (1975) was the first amendment of EAHCA (1974), and it was also the first federal legislation mandating compulsory education for all students with disabilities (Witte, Bogan, & Woodin, 2015). Its principles are still essential to today's special education in the U.S., which include providing funds to find children with disabilities outside of the public school system, mandating states to follow the law to receive federal funding, and requiring individualized education plans for each child with special needs (Yell, Katsiyannis, & Hazelkorn, 2007; Friend, 2013, p. 11).

The year of 1990 was another monumental year for American special education. EHA was renamed and refined to the Individuals with Disabilities Education Act (IDEA). Importantly, this law ensured free appropriate public education (FAPE) and least restrictive environment (LRE) with two major additions: (1) two categories of disabilities: autism and traumatic brain injury; and (2) the needs of transition-related services (Friend, 2013, p. 11). These major changes were influenced by several court cases on inclusion in the 1980s such as Board of Education of the Hendrick Hudson Central School District v. Rowley (1982) supported FAPE, and Roncker v. Walter (1983) and Daniel R. R. v. State Board of Education (1989) ruled in favor of LRE (Hill & Sukbunpant, 2013, p. 125).

IDEA (1990) then was reauthorized in the year of 1997 (IDEA, 1997) with more additions: (1) discipline procedures; (2) parental involvement; (3) classroom teachers' role; and (4) assessment of academic progress of all students with disabilities. The latest reauthorization of IDEA (1997) was the Individuals with Disabilities Education Improvement Act (IDEIA, 2004) with further additions: (1) being consistent with other federal education laws, (2) specific strategies to resolve disputes with parents/families, (3) evidence-based practices when educating students (Yell, Shriener, & Katsiyannis, 2006; Friend, 2013, p. 11).

The core principles in IDEIA (2004) are: (1) zero rate of rejection, which entitles all students with disabilities to a free public education; (2) free appropriate public education (FAPE), which is incorporated in the student's individualized education program (IEP); (3) least restrictive environment (LRE), which varies from instruction in a general education setting to separate school setting; (4) nondiscriminatory evaluation, with the use of multiple assessments in an unbiased decision-making process; (5) parent and family rights to confidentiality; and (6) procedural safeguards (Friend, 2013, pp. 14-15).

Korea

The 1970s marked a turning point in Korean special education because of the first-ever introduction of special education law, Special Education Promotion Act (SEPA) in 1977, which was a significant regulation to implement special education. One noteworthy legislative action in the U.S during this period was that The Education for All Handicapped Children Act (EAHCA) was enacted in 1974. From this period, American public special education and Korean public special education have shown a relatively parallel development albeit with some cultural differences in attitudes toward disabilities. As EAHCA, and later IDEA, have led special education system in the United States, SEPA has been a leading law for special education since then (Kim, 2010).

Similar to EAHCA and EHA, in 1977 SEPA ensured public educational support system and mandated individualized education programs for students with special needs. Also, the law enforced public schools to provide special education services although segregated self-contained classrooms were mainly special education models in public schools (Ku et al., 1994). Also, SEPA was reauthorized in 1988 and the second SEPA mandated free special education services in both public and private special education settings (Ku et al., 1994). While SEPA guaranteed free special education services in public schools, it did not immediately increase mainstreaming for students with special needs. Major placements for these students remained in private or public special schools over the next decade.

Several obstacles resulted in this delay of mainstreaming. First, a huge shortage of special education personnel resources in public schools made parents choose to send their children to specialized schools instead of public schools. Also, the Buddhist notion of Karma toward disabilities discouraged parents from actively pursuing the educational rights for their children with special needs in public schools. Having a child with a disability was a stigma in a family (Kwon, 2005). Another aspect was the societal attitude toward education. 1970s and 1980s was the industrial period when Korea had the most dramatic economic growth after recovering from the Korean War in 1960. During this industrial period, education was the most important tool to succeed in society. Thus, education fields became extremely competitive and public schools mainly focused on higher educational achievements. Thus, schools and teachers had less tolerance for substandard performers who were often students with special needs. These attitudes kept the children with special needs and their parents away from being mainstreamed in public schools (Kwon, 2005).

Four years after IDEA 1990 in the U.S., the third SEPA (1994) was reauthorized with major revisions in Korea. This law started to use the term 'inclusion' and included a mandatory transition service plan. Also, in 1997, SEPA was reauthorized again for the fourth time, and the 4th SEPA emphasized 'inclusive education' in public schools which would ensure the least restrictive environment. From this period, there was a significant upward change in the percentage of students with mild and moderate special needs attending public schools (Ku et al., 1994). Yet, support for these students who were in inclusive settings was considerably lacking and the attitude toward these students and their parents was still negative. The students were considered as lazy, and that laziness blamed on poor parenting. After several revisions of SEPA, the law was finally renamed as Special Education Law for Children with Special Needs in 2007

which is considered the latest stage of Korean special education. This was also a couple of years after IDEA was reauthorized as IDEIA in 2004 in the United States. This new special education law ensured free and mandatory special education services from kindergarten to high school while elementary schools and middle schools are the only mandatory education period for typical students. This law particularly aimed to enforce and extend much more inclusive settings in general education settings for students with special needs (Ku et al., 1994).

Even though the movements in Korean special education are closely paralleled with American special education movement since 1977 SEPA, some aspects were not the same due to cultural differences. The legislative changes of American special education were driven by the civil-rights movement and many court rulings driven by parent advocates (Friend, 2013). Due to this, inclusion progressed quite rapidly since legislation was established in public schools. However, in Korea, having a child with special needs was a social stigma, as mentioned above, and Korean parents were very passive in terms of pursuing legal rights for their children (Kwon, 2005). In addition, the highly respected social status of Korean educators from the notion of ‘Koon-Sa-Boo-IL-Che’ also discouraged parents from expressing their dissatisfaction about the lack of sufficient support (Son & Wang, 2006). Finally, Korean society - which is extremely competitive and impatient toward slow achievement - has little tolerance to work with these people, even in schools together (Kwon, 2005). All of these resulted in a huge gap of inclusion between legislation on paper and practice in reality.

The People’s Republic of China

Development of Special Education in the 1980s. The economic reforms in the 1980s led to a mixed influence of western ideologies and the Soviet Union’s socialistic perspectives. The Article 45 of the Constitution of the People’s Republic of China (1982) was the first fundamental law of the nation to mention special education. The law stated that the nation and society should help make arrangements for work, living, and education for the blind, deaf, and Chinese citizens with other disabilities (the National People’s Congress of the People’s Republic of China, 1982). Also, The Decisions on Reforming the Education System (1985) stated, for the first time, that special education should include education for children with mental disabilities, and it claimed the government’s obligation to develop early childhood education and special education for the blind, deaf, children with other disabilities and mental disabilities (Ding, Yang, Xiao, & Van Dyke, 2008). The Article 9 of the Compulsory Education Law of the People’s Republic of China (1986) mandated the compulsory education for students with disabilities, and the responsibility of local governments to establish special schools or classes for students with disabilities (Ding, Yang, Xiao, & Van Dyke, 2008). In 1986, the Gold-Key Education Project made the first trial of integrating one thousand students with visual impairments into general education classrooms, which led to the policy of Learning in Regular Classrooms (LRC) later (Ding, Yang, Xiao, & Van Dyke, 2008). In 1988, the National Conference on Special Education called for special classes attached to regular schools. In that same year, the Five-Year Work Program for People with Disabilities (1988-1992) proposed the concept of LRC formally, integrating children with disabilities into general education classes. The implementation of LRC is a necessity for children with disabilities who do not live in areas where special schools are present or whose families cannot afford special schools to receive education (Ding, Yang, Xiao, & Van Dyke, 2008). However, LRC does not consider whether the educational program is

appropriate or an individualized education program is available for the student with disabilities (Deng & Manset, 2000).

Significant Improvement in the 1990s to Present. In 1990, the publication of the Guidelines for the Development of Special Education (People's Education Publishing, 1990) and the Law on the Basic Protection of Individuals with Disabilities guaranteed the right of education for individuals with disabilities, pushed forward the development of special education, and expanded the scope of disabilities in China (Chen, 1996; Ding, Yang, Xiao, & Van Dyke, 2008). In 1992, the Detailed Regulations on the Implementation of the Compulsory Education stipulated the school age limits for the children with blindness, deafness, intellectual and mental disabilities. It provided standards and procedures for the establishment of special schools, as well as detailed regulations concerning allowance for the economically disadvantaged families who had children with disabilities and training for special education teachers (china.org.cn, 2016). In 1993, the implementation of the Curriculum Plan for Full Time Schools for the Visually Impaired was a success due to the integration of scientific approaches specifically tailored to the needs of students with visual impairments into the general education curriculum (Deng, Poon-McBayer, & Farnsworth, 2001). The Pilot Project on Implementing Learning in Regular Classrooms for Children and Adolescents with Disabilities (1994) mandated the integration of LRC into development plans of the nine-year compulsory education, and ensured the prompt start of schooling for children and adolescents with disabilities (Ministry of Education of China, 1994; Ding, Yang, Xiao, & Van Dyke, 2008).

In 2006, the Compulsory Education Law formulated special rules and regulations on special education to protect the best interests of children with disabilities. In January 2014, seven Departments, including the Ministry of Education, compiled the Special Education Promotion Plan (2014-2016), which called for refining special education at the universal level, increasing funding to support special education, and improving its quality. This plan also set targets for increasing the enrollment rate of the Compulsory Special Education from 72% to over 90%, and increasing the public funds for the special school budget per student from RMB 2,000 (\$287) to RMB 6,000 (\$863) in three years (The Central People's Government of the People's Republic of China, 2014). The Special Education Teacher Professional Standards (Trial 2015) became the national professional requirements for qualified teachers of special education and norms of teaching students with disabilities. According to Standards (Trial 2015), a teacher is required to show concerns for every student, to prioritize students' safety, and to promote students' physical and mental health. In addition, teachers should treat every student equally, respect the dignity of the students, and defend the students' lawful rights and interests (Ministry of Education of China, 2015).

Current Special Education System in Three Countries

With long historical developments of special education, this section of the paper briefly describes the current status of special education system in all three countries. First, Table 3 presents the disability categories served in public education system in the United States, Korea, and China. As the table indicates, the United States has 13 categories of disabilities that qualify for special education services, Korea has 10, and China has seven. The disability categories of Korea are very similar to those of the United States, while in China, autism; other health impairment (such

as Attention-deficit/hyperactivity disorder or ADHD), specific learning disabilities, and emotional disturbance are not included.

Table 3

Categories of Disabilities that Qualify for Receiving Special Education Services in the United States, Korea, and China

The United States		Korea	China
IDEA (2000)	PL 94-142 (1975)		
Autism	--	Autism (added 2007)	--
Deaf-Blindness	Deaf-Blindness	--	
Deafness	Deafness		
Emotional Disturbance	Severe Emotional Disturbance	Emotional or Behavior Disorders	--
Hearing Impairment	Hearing Impairment	Hearing Impairment including Deafness	Hearing Impairment including Deafness
Intellectual Disabilities/ Mental Retardation	Mental Retardation	Intellectual Disabilities	Intellectual Disabilities
Multiple Disabilities	Multiple Disabilities	--	Multiple Disabilities
Orthopedic Impairment	Orthopedic Impairment	Physical Impairments	Physical Disabilities
Other Health Impairment	Other Health Impairment	Other Health-Related Disabilities	--
Specific Learning Disability	Specific Learning Disability	Specific Learning Disabilities	--
Speech or Language Impairment	Speech or Language Impairment	Communication Impairment	Speech or Language Impairment
Traumatic Brain Injury	--	--	--
Visual Impairment including Blindness	Visual Impairment including Blindness	Visual Impairment including Blindness	Visual Impairment including Blindness
--	--	Developmental Delays	Mental Disabilities

Table 4 also reports the frequency and percentage of students with disabilities across three countries. One interesting aspect of this data is the different prevalence of disability groups across countries. The three largest groups in the US were specific learning disabilities ($n=2,333,960$, 38.64%), speech or language impairment ($n=1,014,817$, 16.78%), and other health impairment ($n=934,020$, 15.44%). Yet, the three largest groups in Korea were intellectual disabilities ($n=48,084$, 53.80%), autism ($n=11,422$, 12.78%), and orthopedic impairment, identified as physical impairment, ($n=10,777$, 12.06%). China's top three disabilities were intellectual disabilities ($n=260,500$, 52.98%), deaf and hearing impairment ($n=90,000$, 18.30%) and blindness and visual impairment ($n=36,100$, 7.34%). The Chinese data may need to be interpreted differently because the country has the fewest disability categories, and the number of students diagnosed with Multiple Disabilities, Physical Disabilities, Speech or Language Impairment, and Mental Disabilities were combined and reported as "other" ($n=105,100$, 21.37%) (Ministry of Education of the People's Republic of China, 2017).

Table 4

Students with Disabilities who Qualify for Receiving Special Education Services in the United States, Korea, and China (Frequency and Percentage)

Disability	The United States (2016-2017) Frequency (%)	Korea (2017) Frequency (%)	China (2016) Frequency (%)
Autism	578,765 (9.56%)	11,422 (12.78%)	--
Deaf-Blindness	1,278 (0.02%)	NA	NA
Deafness	65,465 (1.08%)	3,358 (3.78%) (Deaf & HI Combined)	90,000 (18.30%) (Deaf & HI Combined)
Hearing Impairment			
Visual Impairment including Blindness	24,706 (0.41%)	2,026 (2.26%)	36,100 (7.34%)
Intellectual Disability/ Mental Retardation	416,205 (6.88%)	48,084 (53.80%)*	260,500 (52.98%)*
Emotional Disturbance	335,301 (5.54%)	2,269 (2.54%)	--
Multiple Disabilities	125,868 (2.08%)	NA	NA
Orthopedic Impairment	36,253 (0.60%)	10,777 (12.06%) (Physical Disability)	NA
Other Health Impairment	934,020 (15.44%)	1,626 (1.82%)	--
Specific Learning Disability	2,336,960 (38.64%)*	2,040 (2.28%)	--
Speech or Language Impairment	1,014,817 (16.78%)	2,038 (2.28%)	NA
Traumatic Brain Injury	25,210 (0.42%)	NA	--
Other	154,034 (2.55%) (Develop. Delays)	5,713 (6.40%) (Develop. Delays)	105,100 (21.37%) (Multiple Disabilities, Physical Disabilities, Speech or Language Impairment, & Mental Disabilities combined)
Total	6,048,882	89,353	491,700

Note: * The largest group in special education population in each country

Even though three countries have different numbers of disabilities categories, the different pattern of prevalence across all three countries deserves attention. For example, the specific learning disability is the highest prevalence group (38.64%) in the US, but it was identified as being only 2.28% in Korea. It is also important that China does not even have (or recognize) a disability category. Speech and language impairment category was the second largest group (16.78%) in the US, yet it was identified as being very small (2.28%) in Korea while the data of this category was not reported separately in China. On the other hand, intellectual disability was the largest group, almost a full half of the overall special education population, in both Korea (53.80%) and China (52.98%) while the US identified the disability as being only 6.88%. Another noteworthy category is autism. The disability category was the fourth largest group (9.56%) in the US. This popular disability was identified as the second-largest group (12.78%) in Korea. However, China does not identify or recognize this disability category.

Table 5

Placement for Students with Disabilities Receiving Special Education Services in the United States, Korea, and China (Frequency and Percentage): From Least to most Restrictive

Placement	The United States (2016-2017) Frequency (%)	Korea (2017) Frequency (%)	China (2017) Frequency (%) (1st-9th Grade)
General Education Classroom with few or no Support Services	80% or more time inside general class: 3,819,290 (63.14%)	Reported as General Education Inclusive Classroom including full and partial inclusion:	Reported as General Education Classroom & Special Education Classroom:
General Education Classroom with Collaboration Teacher Assistance		47,564 (53.23%)	30,400 (52.52%)
General Education Classroom with Itinerant Specialist Assistance	40-79% of time in general class: 1,109,547 (18.34%)	No separate data for different types of general education inclusive classrooms	No separate data for different types of general education classroom or special education status
General Education Classroom with Resource Room Assistance		NA	
Special Education Classroom with Part Time in General Education Classroom	less than 40 of time in general class: 811,335 (13.41%)	15,590 (17.45%)	
Full-time Special Education Classroom			
Special School	173,573 (2.87%)	25,798 (28.87%)	27,480 (47.48%)
Residential School	15,467 (0.26%)		NA
Homebound Instruction	23,334 (0.39%)	Reported as Special Education Supporting Centers:	NA
Hospital Instruction	85,008 (1.40%)		NA
Private School			
Correctional facility	11,328 (0.19%)	401 (0.45%)	NA
Total	6,048,882	89,353	57,880

Finally, Table 5 compares the placements for students with disabilities across three countries. According to 2016-2017 national data, appropriately four-fifth of students with special needs in the US were served in inclusive general classrooms. The percentage of students who spent 80% or more time inside the general classroom was 63.14% ($n=3,819,290$) while those who spent 40-79% of their time in general class made up 18.34% ($n=1,109,547$). Somewhat differently, about one half of Korean students with special needs were in inclusive general classrooms ($n=47,564$, 53.23%). Korea does not report inclusion settings per the percentage of times in general classroom. It was only reported as general classroom inclusion, including full and partial inclusion. The percentage of students who were placed in full-time special classrooms in both countries are slightly similar. It was 13.41% ($n=811,335$) in the US and 17.45% ($n=15,590$) in Korea. China's data are more unique, which should be interpreted with caution. First, the Ministry of Education of the People's Republic of China (2018) does not report separate data based on different types of inclusion in general schools. It was reported that there were 30,400

(52.52%) students in general schools, including those in general education classrooms and those in special education classrooms. In addition, the data only include students from 1st through 9th grade, that is, elementary to junior high school. The reason is probably because that China has the 9-year compulsory education starting from 1st grade and ending at the 9th grade. The high-school system is more complicated in China, which is composed of the general high school, high school for adults' continued education, and vocational schools (Ministry of Education of the People's Republic of China, 2018).

The placement settings other than general schools show great differences among three countries. Almost a half of Chinese students with special needs are placed in either special schools or residential schools ($n=27,480$, 47.48%). The students placed in special schools in Korea ($n=25,798$, 28.87%) is also significantly higher than the US ($n=173,573$, 2.87%). As previous sections addressed, all three countries have seen progress in moving away from segregation to inclusion and inclusive education, yet the pace of this movement is different for each, being shaped by their unique history, culture, socio-economic status, major legislation, and advocacy of parents (McLeskey, Rosenberg, & Westling, 2009). Future studies need to investigate disability identification processes and placement status in each of the countries in greater depth. Also, more specific cultural and historical factors which caused current disability categories and placement options must be investigated as well.

Discussion and Conclusion

In the present era influenced by increased globalization, influence across countries is inevitable. No single country can stand alone. China and Korea, two adjacent countries, have had a very long history of influencing each other philosophically, economically, and politically. Both also opened their doors to western countries and were exposed to the western special education system, particularly the United States' system in the same time period. However, as this study presented, both countries developed their special education system significantly differently due to different social, economic, and political statuses from the late 19th century and onwards. Furthermore, Korea, which has a much more similar legislative special education movement to American laws than China, also saw unique development due to its own cultural attitudes toward disabilities and education. The researchers believe this study has shown a clear historic comparison of special education development across all three countries.

To summarize, the United States had its first legislation related to special education, the Elementary and Secondary Education Act (ESEA), in 1965. One decade later, Korea had its first legislation related to special education, Special Education Promotion Act (SEPA), in 1977. Seventeen years after ESEA and five years after SEPA, China introduced its first legislation related to special education, Article 45 of the Constitution of the People's Republic of China, in 1982. Even though the legislation in Korea and China started later than in the United States, legislators in these two countries have been working hard on introducing more laws and regulations to improve the quality of life for people with disabilities. Table 1 presents the legislative changes across these three countries.

While this study explicitly described the differences, some limitations in terms of the comparison exist. First, this study did not specially identify how legislative changes were influenced. For

example, this study indicated that Korean special education laws were amended or reauthorized just a couple of years after American legislative changes. However, this study did not address who examined, modified and reflected American laws into Korean special education laws, nor how or why. Also, this study only focused on legislative influences which presented only one of the multiple aspects of historical interconnectivity across all three countries. Any other types of academic, cultural, social, or economic influence which caused those legislative changes were not fully explored. So, further studies in other aspects will provide a complete explanation of how all three countries have developed special education compared with one another. For example, it is necessary to address the question of why certain popular disabilities like specific learning disabilities and autism in the US have not been much identified in Korea and China and what is the implication of the lack of identification.

Finally, this study can be beneficial to the preparation of teacher training programs in terms of working with new immigrant families in special education. Understanding the historic similarities and differences across these countries can provide useful information to teachers how they assist parents of children with special needs from both China and Korea more effectively. For example, Korean families who recently immigrated from Korea to the United States may not be familiar with the now-normal placement of children with special needs in a general education classroom for the majority of school hours. Chinese families will be more unfamiliar with inclusion in general schools in the United States. In terms of disability categories, Chinese families may have more difficulty understanding the concept of specific learning disabilities or autism since those are not categories defined separately in China (Ministry of Education of the People's Republic of China, 2018). Thus, providing more detailed explanation to newly immigrated Chinese parents about these relatively uncommon concepts can help promote a better understanding of the American special education system.

References

- Anonymous. (n.d.). *Mangja's mom moved three times for her son's education*. Korean saying.
- Chen, Y. (1996). Making special education compulsory and inclusive in China. *Cambridge Journal of Education*, 26(1), 47-58. doi: 10.1080/0305764960260104
- China Disabled Persons Federation. (1996). *The annual record for the development of issues of people with disabilities from 1949 to 1993*. Huaxia Publishing House.
- China.org.cn. (2016). *The detailed regulations on the implementation of the compulsory education*. Retrieved from <http://www.china.org.cn/english/education/184879.htm>.
- Chung, Y. (1985). *A comparative study of educational decentralization in China and Korea, 1985-1995: Motives, actions, and results*. UMI Microform 3315537.
- Deng, M., & Manset, G. (2000). Analysis of the 'learning in regular classrooms' movement in China. *Mental Retardation*, 38, 124-130. doi: 10.1352/00476765(2000)038<0124:AOTLIR>2.0.CO;2
- Deng, M., Poon-McBrayer, K. F., & Farnsworth, E. B. (2001). The development of special education in China: A sociocultural review. *Remedial and Special Education*, 22(5), 288-298. doi: 10.1177/074193250102200504
- Ding, Y., Yang, L., Xiao, F., & Van Dyke, D. C. (2008). Post-Mao China: Educational services for exceptional individuals. *The Journal of the International Association of Special Education*, 9(1), 38-50. Retrieved from

- <http://web.a.ebscohost.com/proxynw.uits.iu.edu/ehost/pdfviewer/pdfviewer?vid=4&sid=9768dfb9-f2cc-49e7-9e82-932b2ad60080%40sessionmgr4007>
- Ellsworth, N. J., & Zhang, C. (2007). Progress and challenges in China's special education development: Observations, reflections, and recommendations. *Remedial and Special Education, 28*(1), 58-64. doi: 10.1177/07419325070280010601
- Friend, M. (2013). *Special education: Contemporary perspectives for school professionals* (4th ed.). Upper Saddle River, New Jersey: Pearson Education, Inc.
- Hill, D. A., & Sukbunpant, S. (2013). The comparison of special education between Thailand and the United States: Inclusion and support for children with autism spectrum disorder. *International Journal of Special Education, 28*(1), 120-134. Retrieved from <https://files.eric.ed.gov/fulltext/EJ1013682.pdf>
- Huang, Y. (1994). Introduction of Hong Rengan's legislation view point. *Monthly Periodic of Historical Study, 6*, 59.
- Jiang, H. (1986). *The handbook of modern revolutionary history in China*. Beijing: Guangmin Daily Press.
- Kang, I. J. (2002). A view of the Won-Buddhist toward the handicapped shown to the Won-Buddhist scriptures. *Won-Buddhist Study, 8*, 31.
- Kim, B. H. (1983). *Historical understanding of special education*. Seoul: HyoungSeol Press.
- Kim, E., & Zhang, J. (2015). The historical influence of American special education to special education in Korea and China. Chicago, IL, September 25-26, 2015. *Organization of Educational Historians*.
- Kim, M. (2010). A study on the further direction through reflective thinking about the past and present of special education in Korea. *The Journal of Eurasian Studies, 7*(2), 193-209. doi: 10.31203/aepa.2010.7.2.011
- Ku, B., Kim, D., Kim, Y., Kim W., Park, H., Seok, D., et al. (1994). *Special education theory*. Seoul: KyoYuk KwaHak Press.
- Kwon, H. (2005). Inclusion in South Korea: The current situation and future directions. *International Journal of Disabilities, Development and Education, 52*(1), 59-68. doi: 10.1080/10349120500071910
- McLeskey, J., Rosenberg, M. S., & Westling, D. L. (2009). *Inclusion: Effective practices for all students*. Upper Saddle River, New Jersey: Pearson.
- Meyer, G., & Patton, J. (2001). On the nexus of race, disability, and overrepresentation: What do we know? Where do we go? On point...Brief discussions of critical issues in urban education. *Newton, National Institute for Urban School Improvement*.
- Ministry of Education of the People's Republic of China. (1994). *Trial measures of implementing Learning in Regular Classrooms for children and adolescents with disabilities*. Ministry of Education in China, Beijing.
- Ministry of Education of the People's Republic of China. (2015). *The special education teacher professional standards (trial)*. Retrieved from http://www.moe.edu.cn/srcsite/A10/s6991/201509/t20150901_204894.html.
- Ministry of Education of the People's Republic of China. (2017). *National educational statistics in 2016*. Retrieved from http://www.moe.gov.cn/jyb_sjzl/sjzl_fztjgb/201707/20170710_309042.html.
- Ministry of Education of the People's Republic of China. (2018). *National educational statistics in 2017*. Retrieved from http://www.moe.gov.cn/jyb_sjzl/sjzl_fztjgb/201807/t20180719_343508.html.

- Mou, Y. (2006). The development of Chinese special education and its revelation. *Chinese Special Education*, 5, 38.
- National People's Congress of the People's Republic of China. (1982). *Constitution of the People's Republic of China*. Retrieved from http://www.npc.gov.cn/englishnpc/Constitution/node_2825.htm.
- Pardini, P. (2002). The history of special education. *Rethinking Schools Online*, 16(3), 1. Retrieved from <https://www.rethinkingschools.org/articles/the-history-of-special-education>
- People's Education Publishing. (1990). Guideline for the development of special education. In *Selective Documents and Readings on Special Education* (pp.4-12). People's Education Publishing House.
- Scheerenberger, R. C. (1983). *A history of mental retardation*. Baltimore: Paul H. Brookes.
- Seth, M. J. (2005). Korean education: A philosophical and historical perspective. In G. L. Kim-Renaud (Ed), *The Sigur Center Paper: Korean Education*.
- Son, S., & Wang, X. C. (2006). Immigrant parents' involvement in American schools: Perspectives from Korean mothers. *Early Childhood Education Journal*, 34(2), 125-132. doi: 10.1007/s10643-006-0070-6
- Taegu University Special Education Center. (1993). *Principles of Korean special education*. Taegu: Taegu University Press.
- The Central People's Government of the People's Republic of China. (2014). *The special education promotion plan (2014-2016)*. Retrieved from http://www.gov.cn/zwggk/2014-01/20/content_2570527.htm.
- Turnbull, A., P., Stowe, M., Wilcox, B. L., & Turnbull, R. H. (2000). *Free appropriate public education: The law and children with disabilities (5th ed.)*, pp.11-30. Denver: Love.
- U.S. Department of Education, National Center for Education Statistics. (2018). *Digest of education statistics, 2016* (NCES 2017-094), Chapter 2. Retrieved from https://nces.ed.gov/programs/digest/d16/ch_2.asp.
- U.S. Department of Education. (2015). *Every Student Succeeds Act (ESSA)*. Retrieved from <http://www.ed.gov/essa?src=rn>.
- Worrell, J. L., & Taber, M. (2009). Special education practices in China and the United States: What is to come next? *International Journal of Special Education*, 24(3), 132-142. Retrieved from <https://files.eric.ed.gov/fulltext/EJ877945.pdf>
- Witte, R. H., Bogan, J. E., & Woodin, M. F. (2015). *Assessment in special education*. Upper Saddle River, New Jersey: Pearson.
- Yang, H., & Wang, H. (1994). Special education in China. *The Journal of Special Education*, 28, 93-105. doi: 10.1177/002246699402800107
- Yell, M. L., Katsiyannis, A., & Hazelkorn, M. (2007). Reflections on the 25th anniversary of the U.S. Supreme Court's decision in Board of Education v. Rowley. *Focus on Exceptional Children*, 39(9), 1-12. doi: 10.17161/fec.v39i9.6876
- Yell, M. L., Shriener, J. G., & Katsiyannis, A. (2006). Individuals with Disabilities Education Improvement Act of 2004 and IDEA regulations of 2006: Implications for educators, administrators, and teacher trainers. *Focus on Exceptional Children*, 39(1), 1-12. Retrieved from: <http://web.a.ebscohost.com.proxynw.uits.iu.edu/ehost/pdfviewer/pdfviewer?vid=16&sid=9768dfb9-f2cc-49e7-9e82-932b2ad60080%40sessionmgr4007>