Comparative Study: Educating a Student with Autism in Tanzania and the United States

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Senior Project

Fall 2007

Inclusion around the World:

A Review of Inclusive Practices in Special Education in Seven Countries
Including people with disabilities has become a major issue around the world in recent decades; over the past 30 years, numerous countries have been progressively working to eliminate exclusionary social practices that disregard the rights of people with disabilities, and they have been attempting to promote their inclusion and acceptance in ordinary daily activities (Eleweke & Rodda, 2002). This progress is especially evident in the context of public education. Public schools in many parts of the world were not even required to educate students with disabilities until the middle of the 20th century (Picus, 2005), and while some countries are still working to achieve this task, others are beginning to focus on inclusion, or the education of students with disabilities in neighborhood schools and general education classrooms (Katsiyannis & Conderman, 1995). In the past, students with disabilities were typically placed in classrooms and schools completely separate from the mainstream setting (Katsiyannis & Conderman, 1995), so inclusion reform is a complex process that requires schools and school systems “not simply to restructure special education so that it fits into an existing system, but to restructure education as a whole so that all students may fully participate” (Stough, 2003, p. 14).

Legislation in some countries has required the inclusion of students with disabilities for a number of decades. In the United States, for example, Congress passed an act in 1975 that required schools to place students with disabilities in the least restrictive environment appropriate to meet their needs (Cook, Gerber, & Semmel, 1997). However, few countries began to make a genuine effort to advance inclusion until the World Conference on Special Education in Salamanca in 1992. At this conference,
representatives of 92 world governments met to discuss the goals of UNESCO's Education for All policy, and they developed The Salamanca Statement and Framework for Action on Special Needs Education (UNESCO, 1994). This statement maintains that "children with disabilities should have access to regular schools which can accommodate them" (Lundy & Kilpatrick, 2006, p. 58), and it set the stage for a worldwide shift toward inclusionary practices. Since the conference, countries around the world have begun to take steps to integrate and accommodate students with disabilities in inclusionary settings (Stough, 2003). Due to imbalanced resources, government priorities, and differing societal views about people with disabilities, the development of inclusion is very different around the world. In order to attain a clear picture of this worldwide progress and of current inclusionary practices, this study will highlight various aspects of special education and inclusion in the following 7 countries: Brazil, China, Costa Rica, Ireland, New Zealand, Tanzania, and The United States. In making note of the history of special education, structure of regular education, and progress toward inclusive education in each of these very different countries, this study should provide a comprehensive picture of the present state of inclusion around the world.

*Brazil*

In 1500, the Portuguese founded the South American country currently known as The Federal Republic of Brazil. The Portuguese colonized Brazil until it won its independence in 1822 (Galloway, 2005). In its early years as a Republic, Brazil was primarily a farming society that exported coffee among other natural products. In this agrarian setting, many citizens began to desire education, and the demand for it remains high today (Gomes, 1999). Despite its economic strengths, a variety of social issues, such
as high poverty rates, widespread crime, and incompetent public services, continue to plague Brazilian society (Galloway, 2005). The effects of these issues are widespread, and people with disabilities make up one group that continues to face discrimination and marginalization. Of the approximately 15 million people with disabilities who live in Brazil, only 6 million receive any type of governmental or public assistance (Mantoan & Valente, 1998).

Until 1920, the Brazilian government was not required to provide universal public education for all, and the system was especially discriminatory toward children affected by poverty or disability (Lin, 1987). In the 1920s, a group of progressive educators initiated a movement to promote the universal right to education, and the effects of this movement can still be seen today (Gomes, 1999). All children ages 7 to 15 are currently required to attend the primary grades one through eight. Secondary school is optional, and it typically involves three additional years of schooling. Before the early 1970s, only the wealthy were typically able to attend school (Mantoan & Valente, 1998), but in recent years it has become competitive on the basis of achievement rather than wealth (Gomes, 1999). Public education in Brazil has also progressively become more centralized as the federal government now controls almost every aspect of primary schooling, and primary schools are fairly identical across the entire country (Mantoan & Valente, 1998).

Although Brazil seems to have made some progress in the realm of education, "the dropout rate in regular and special education is very high" (Mantoan & Valente, 1998, p. 12), and the national rate of illiteracy in 1991 was still quite high at 22.2% (Mantoan & Valente, 1998).
Along with general education, special education in Brazil has slowly progressed over the past 150 years. In 1600, the first institution for individuals with cognitive disabilities was established, but no further development occurred until 1822. The first school for the deaf was established in 1854, and the first school for the blind was opened two years later (Lin, 1987). In recent decades, the government has created numerous programs for people with disabilities that are similar to those put in place in the United States, though, as a general rule, the programs in Brazil have been established about 20 years after they were established in the U.S (Lin, 1987). In 1961, the Brazilian government developed the National Education Plan, a policy that emphasized education for all individuals, including those with disabilities, and mandated that 5% of educational funds be used for special education (Mantoan & Valente, 1998). In the early 1990’s, the governmental policy toward special education tended to stress rehabilitation rather than academics, but in 1993 this policy began to change, and “today special education is considered part of regular education” (Mantoan & Valente, 1998, p. 19). A centralized governmental organization currently controls special education throughout Brazil (Lin, 1987).

As in many countries throughout the world, inclusion is an issue central to the current changes in special education in Brazil. Although Brazilian governmental policy in recent years has tended to support inclusive practices, “It is important to note that this shift did not occur as a result of any single piece of legislation” (Mantoan & Valente, 1998, pp. 19-20). Following World War II, American influence began to overshadow that of Europe in Brazilian culture, so Brazil adopted policies involving the mainstreaming of students with disabilities at almost the same time as the U.S. In the 1950s and 1960s,
Brazil began to create special education classes in general education schools (Lin, 1987), and “The current tendency is to include students with disabilities in regular school classrooms” (Mantoan & Valente, 1998, p. 19). Although students with disabilities have increasingly begun to be included in regular classes in Brazil (Mantoan & Valente, 1998), the Brazilian system of inclusion is far from perfect. Some critics maintain that the Brazilian government adopted policies of inclusion simply to ease the financial strain of the educational system (Lin, 1987). Studies note that students with disabilities often have trouble when they begin receiving services in the general education classroom (Mantoan & Valente, 1998), and “there is a noticeable lack of systematic supervision, monitoring, and evaluation” (Lin, 1987, p. 270) of these students as they are reintegrated into general classes. Though inclusion in Brazil has come a long way in recent years, the remaining social constructs and educational policies leave it with a long way to go.

China

China has the largest population in the world (Deng, Poon-McBrayer, & Farnsworth, 2001), and more than 51 million of its citizens have disabilities (Chen, 1996). Because it is a developing country, China’s foundation for both special education and disability services is very delicate, but its treatment of people with disabilities has historically been very humane in comparison to that of Western countries (Deng, Poon-McBrayer, & Farnsworth, 2001). Though the famous philosopher Confucius did not recommend education for all individuals (Ellsworth & Zhang, 2007), other innovative Chinese thinkers advocated helping people with disabilities as far back as 2000 years ago (Yang & Wang, 1994). Because China has such an enormous population of people with disabilities, the success of special education is largely restricted by a lack of financial
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resources and collective attitudes toward them, and many citizens believe that China should not offer special education to students with disabilities until general education is guaranteed to students without disabilities. Although obstacles like a lack of resources, a shortage of qualified personnel, and disapproving public attitudes remain in the way of the effectiveness of special education (Yang & Wang, 1994), China has made advancements in the past decades in the realms of both special and general education.

Public education in China faced difficulty from the beginning due to the sheer enormity of the Chinese student population. China became a republic just 40 years ago, yet the country is currently faced with the challenge of educating over 210 million children each year (McLoughlin, Zhou, & Clark, 2005). In the 1980’s, the Chinese government initiated a movement to persuade parents to send their children to school for at least 9 years, and the educational system now includes six years of elementary school, three years of junior middle school, and two years of senior middle school (Edmonds & Smith, 2005). In keeping with the norms of the culture, the educational system in China is extremely competitive and historically elitist, and the curriculum is based upon demanding examinations that determine the progress and destiny of every student (McLoughlin, Zhou, & Clark, 2005). Schools feel pressure to attract students who will perform well on examinations, and teachers feel pressure to advance the performance levels of students in their classes (Poon-McBrayer, 2004). As a result, “many classroom teachers dislike teaching children with special needs and experience high levels of stress when faced with such children” (Poon-McBrayer, 2004, p. 253).

Since ancient times, Chinese society has viewed caring for individuals with disabilities as everyone’s responsibility (McCabe, 2007). However, due to a lack of
resources, the first schools for students with disabilities were not developed until the 1800s, and even then they were developed not by the Chinese, but by Western missionaries (Deng, Poon-McBrayer, & Farnsworth, 2001). After World War II, mandates were put into place to protect the rights of people with disabilities (McLoughlin, Zhou, & Clark, 2005), and in the 1950s the government opened the first residential schools for students with disabilities (Deng, Poon-McBrayer, & Farnsworth, 2001). Like many aspects of Chinese culture, the development of special education in China was slowed during the Cultural Revolution (Yang & Wang, 1994), but in 1986 a pivotal law was passed by the Chinese government. This law, the China Compulsory Education Law of the People’s Republic of China, guaranteed that all children, including those with disabilities, were entitled to a free public education (McLoughlin, Zhou, & Clark, 2005). As a result of this legislation, “Between 1987 and 1996, the school entrance rate of students with disabilities rose from 6% to 60%” (Deng, Poon-McBrayer, & Farnsworth, 2001, p. 291). Though the education rate of students with disabilities in China is still on the rise, special education continues to face challenges. For example, the government has not yet implemented requirements for special education teachers (Poon-McBrayer, 2004), and students with disabilities other than vision impairments do not receive accommodations on the examinations that are such high determinants of every student’s educational future (McLoughlin, Zhou, & Clark, 2005). In addition, multiple disability categories that are recognized in other parts of the world are not yet recognized in China. The only disability categories that the Chinese government currently recognizes are vision, hearing, intellectual, physical, mental, and multiple impairments (McLoughlin, Zhou, & Clark, 2005). Autism, which has received a great deal of attention
in the United States in recent years, is not a recognized disability in China (Deng, Poon-McBrayer, & Farnsworth, 2001), and adaptive behavior does not play a part in the diagnosis of developmental delay (McLoughlin, Zhou, & Clark, 2005). In addition, medical professionals are currently the only individuals involved in the process of disability classification (McLoughlin, Zhou, & Clark, 2005).

Although China is still making progress in special education in general, the issue of inclusion is quickly becoming quite prevalent among special and general educators. The United States’ focus on inclusion over the past few decades has greatly affected the beliefs and priorities of the Chinese government and has led it to promote including students with disabilities in neighborhood schools and regular classrooms (Deng, Poon-McBrayer, & Farnsworth, 2001). Some students with disabilities have attended their neighborhood general education schools since the 1980s (Yang & Wang, 1994), and government policy is making schools increasingly accountable about educating these students (McLoughlin, Zhou, & Clark, 2005). Though many Chinese students with disabilities still receive services in separate classrooms (Poon-McBrayer, 2004), by 1987 54% of students were already included in regular classes (Chen, 1996), and this figure continues to rise especially among students with learning disabilities (Poon-McBrayer, 2004). Although China has begun to make progress toward inclusion in recent years, it remains the hope of disability advocates that the government will continue to look to the United States as an example and eventually pass legislation of its own that requires appropriate levels of inclusion for all students with disabilities (Poon-McBrayer, 2004).
Costa Rica

Though Costa Rica is still a developing country in terms of its economy (Stough, 2003), it offers “one of the most accessible and progressive public education systems in Latin America” (Stough, 2002, p. 34). In 1869, Costa Rica became one of the first countries in the world to offer free, compulsory, and government-sponsored public education to all of its school-age citizens (Stough, 2003), and the results of this historic legislation can still be seen today. Because it does not have an army, Costa Rica is able to spend an astonishing 1/3 of its national budget on education (Stough & Aguirre-Roy, 1997). Primary education consists of 6 years of elementary school, and it is compulsory for all children. Secondary education, conversely, is not required and only 56% of children attend (Stough, 2002). As a result of its mandatory primary education program, the Costa Rican literacy rate is over 92%, a figure that is quite remarkable in comparison to the rest of Latin America (Stough & Aguirre-Roy, 1997).

Like its general education programming, special education in Costa Rica has historically been very progressive. Although the majority of children with disabilities remained at home with their families until the mid-1900s, Costa Rica was still one of the first countries to pass legislation regarding their education (Stough, 2003). In 1957, the Fundamental Law of Education “clearly established the constitutional right of children with disabilities to a special education within the public school system” (Stough, 2003, p. 8). In 1970, 20 special education schools were available to students with disabilities, and in 1973 the government began to create special education classes within regular schools (Stough & Aguirre-Roy, 1997). Today, 7000 Costa Rican students are served by special
education services, and this figure is 7% of the national school-age population (Stough, 2002).

Because the idea of inclusion fits well with basic Costa Rican beliefs, Costa Rica has been a worldwide leader in including students with disabilities in regular schools and general education settings. Special education classrooms began to form within regular schools as early as 1973, and the philosophy of the national Department of Special Education began to shift toward inclusion especially after the World Conference on Special Education in 1992 in Salamanca (Stough, 2003). Since then, and especially over the past decade, the focus of special education has moved from creating separate services for students with disabilities to developing new ways to include them in the already existing general education system. In 1996, a law was passed that required schools to place students with disabilities in the least restrictive environment appropriate (Stough, 2002), and the majority of students with disabilities now receive special education services in general education or resource classrooms (Stough & Aguirre-Roy, 1997). Teachers seem to have generally more positive attitudes toward inclusion as procedures are improved and they begin to see its effects on students with disabilities (Stough, 2002). In recent years, the focus seems to have moved from inclusion to the description of students with disabilities; advocates contend that using levels of modification rather than types of disability would be more helpful in determining which services a student needs (Stough, 2002). Perhaps this will be the next major issue with which special educators in Costa Rica will contend.
Ireland

Ireland, an independent island nation in Northern Europe, is home to almost 4 million people (Gilmor & O’Leary, 2005) and is still in the process of developing its approach to special education. As in many countries around the world, people with disabilities in Ireland are considered inferior to those without disabilities (McDonnell, 2003). Although the Department of Education reported that 14% of Irish school-age children were recognized as eligible for special education in 2004 (Hunter & O’Connor, 2006), “considerable levels of inequality” (McDonnell, 2003, p. 261) remain in the special education system, and the nation still has a long way to go in regards to providing an appropriate education to its students with disabilities.

Ireland offers free, compulsory education to all citizens ages 6 to 15. Students attend grades one through seven in primary school, and they then take a test that determines which secondary school they will attend. Students attend years 8 through 12 of secondary school, and they can then decide whether or not to further their education by completing years 13 and 14 and university. Though the government financially supports the education of students in grades one through eight, most schools in Ireland are managed by the Catholic Church (Gilmor & O’Leary, 2005), and many remain in the developmental stages in regards to special education programming.

The first schools for students with disabilities in Ireland were created over 200 years ago for students who were blind or deaf (McDonnell, 2003). Special education has slowly progressed since that time though its history remains full of obstacles and inequalities. One recent governmental report “identified education and training as one of a number of areas where exclusion was particularly evident” (McDonnell, 2003, p. 259).
In the years since the Salamanca Statement and Framework for Action on Special Needs Education was released, special education has entered the national spotlight in Ireland (Lundy & Kilpatrick, 2006). Although the current disability categories of intellectual disability, visual impairment, physical disability, multiple disabilities, hearing impairment, speech/language impairment, learning disability, and emotional impairment still exist (LeRoy, Evans, & Delucca, 2000), legislation such as the 1993 Education Act has attempted to replace disability categories with the broader term “special educational needs,” which would establish special education eligibility for more Irish students (Mmbaga, 2002). Observers note that “special education in all its forms is entering a critical transition period in which new policies are being developed” (McDonnell, 2003, p. 261), and it seems as if the Irish government is finally beginning to focus on providing its students with disabilities with the most appropriate education possible (McDonnell, 2003).

As governmental policies regarding special education continue to develop in Ireland, inclusion has become an important focal point for many lawmakers and disability activists (McDonnell, 2003). This concept of including students with disabilities in neighborhood schools began with the passage of the Education Act in 1981, and it has broadened ever since (Moran & Abbott, 2002). Students who would have attended special schools in the past are increasingly enrolling in special classes in their neighborhood schools, and “Inclusion is the ‘keystone’ of today’s Government education policy” (Moran & Abbott, 2002, p. 162). Although the theoretical and practical concepts of including students in neighborhood schools continue to spread throughout school districts in Ireland, lawmakers have yet to require that schools place students with
disabilities their least restrictive environments (McDonnell, 2003). This type of legislation would require schools to place some students with disabilities in the general education setting and could be a part of an upcoming policy change in which comprehensive planning will be required for every school in Ireland (Hunter & O'Connor, 2006).

New Zealand

New Zealand, an island nation located off the coast of Australia, "is a multicultural society with a variety of educational perceptions for its children" (Dunn, 2000, p. 73). New Zealand has long been considered a progressive leader in education (Mitchell, 2001), and, as expected, special education legislation has provided that students with disabilities should be educated on an individual basis and included in general education classes if possible (Varnham, 2002). New Zealand has made a remarkable amount of progress in special education especially in recent years; in essence, its special education system "is moving from being relatively...unpredictable, uncoordinated and nationally inconsistent to being relatively coherent, predictable, integrated, and consistent across the country" (Mitchell, 2001, p. 333).

Although New Zealand has been recognized as an educational leader in the world, free education was not made compulsory by the government until the late 1980's. The Education Act of 1989 provided free, public education for all students beginning on their 5th birthday and ending on January 1st after their 19th birthday (Varnham, 2002). Students attend years one through six of primary school and forms one through seven of secondary school (Philips, 2000). In more recent years, general education legislation has focused on creating curricular objectives and requirements that are consistent in schools throughout
the nation and developing assessment techniques that accurately monitor student progress (Philips, 2000).

Special education was first recognized by the government in 1964 when it passed an act that allowed for the continuation of special schools and services for students with disabilities; however, if the Director of General Education determined that a student had to attend a special school, it became the responsibility of the student’s parent to pay the special school tuition fees (Varnham, 2002). These special schools were completely separate from general education schools, and they remained open and separate until the government passed the Education Act of 1989. This act focused on inclusion and was the direct result of a shift toward inclusive attitudes and practices around the world during that period (Varnham, 2002). This Education Act of 1989 required schools to accept all students with disabilities (Mitchell, 2001), and the Human Rights Act of 1993 forbid schools from “refusing or failing to admit a student with a disability or admitting such a student on less favourable [sic] terms and conditions than would otherwise be made available” (Mitchell, 2001, p. 321). Since the early 1990s, “New Zealand has had legislation protecting the rights of students who are disabled to enrol [sic] in a school of their choice” (Kearney & Kane, 2006, p. 206), and schools are now required to meet with parents and teachers to create Individual Education Plans for every student with disabilities (Dunn, 2000). At the beginning of the millennium, New Zealand’s government passed Special Education 2000, an act that advocated the development of “a world class inclusive education system that provides learning opportunities of equal quality to all students” (Mitchell, 2001, p. 323). Over the past few years, New Zealand has begun to replace traditional disability categories with the term "special educational
needs” in an effort to shift the emphasis from a student’s disability to the educational support that he or she requires (Varnham, 2002). Although this general shift has been taking place throughout schools in New Zealand, several government proposals based on customary disability categories, such as behavior, speech, and health impairments, were presented in 1998 (Mitchell, 2001), so it remains unclear how committed the New Zealand government is to the disestablishment of these categories.

As previously stated, inclusion has become an integral part of the special education system in New Zealand; in fact, “New Zealand has had a long-standing commitment to integrating students with special needs into regular education as far as possible” (Mitchell, 2001, p. 329). The movement to include students with disabilities in New Zealand developed as a result of mainstreaming and special education (Kearney & Kane, 2006), and the trend for students with disabilities today is that “as many children as possible are to be mainstreamed into regular schools” (Varnham, 2002, p. 284). Students with disabilities in governmental preschool programs in New Zealand are usually included in regular classrooms (Dunn, 2000), and the Department of Education has offered free professional development services to every school in New Zealand in order to equip teachers with the skills they need to successfully include students with disabilities (Kearney & Kane, 2006). As New Zealand policy continues to promote inclusion, critics claim that these policies have gone too far, noting that “Even when an IEP shows that the educational needs of that student would most effectively be met within a special facility and that, in the case of that child, mainstreaming would be inappropriate, there is generally no chance of an alternative setting” (Varnham, 2002, p. 291).
Tanzania

Tanzania, a large country located in East Africa, is one of the poorest countries in the world (Commins, 2005); “forty-one years after independence, the majority of Tanzanians still live on less than a dollar a day” (Mmbaga, 2002, p. 63). Researchers have estimated that the majority of people with disabilities around the world come from developing countries in which they receive few to no services (Eleweke & Rodda, 2002), and Tanzania is no exception. Providing education to students with disabilities is not a top governmental priority in any part of the world, and it is even less so in developing countries like Tanzania in which public education is not yet guaranteed even for students without disabilities (Dawson, Hollins, Mukongolwa, & Witchalls, 2003). The additional cost of educating students with disabilities would require funding that the Tanzanian government simply does not have (Eleweke & Rodda, 2002); therefore, attempting to educate students with disabilities in the general education classroom, though it is a deeply flawed and imperfect option, seems to be the only choice currently feasible in Tanzania (Mmbaga, 2002).

Although Tanzania theoretically offers free primary education to all of its school-age citizens, in reality most Tanzanian children do not attend school (Cooksey & Riedmiller, 1997). Only 56% of school-age children enter primary school, and, of those, only 38% finish it (Mmbaga, 2002). The average child who enters primary school begins at age nine, which means he or she would not complete the seven grades of primary school until age 16 and the six forms of secondary school until at least age 22 (Cooksey & Riedmiller, 1997). In addition to these enrollment issues, over the past few years in Tanzania “the quality of schooling has steadily fallen, [and] the achievement level
expected of students...has steadily risen” (Cooksey & Riedmiller, 1997, p. 125). An emerging policy of high-stakes testing in the Tanzanian educational system has led students and teachers to focus on passing tests instead of learning, and “There is no doubt that cramming to pass examinations takes precedence over any more general goals of intellectual or personality formation” (Cooksey & Riedmiller, 1997, p. 126). Educational failure rates in Tanzania are unbelievably high (Cooksey & Riedmiller, 1997), and the Ministry of Education recommends that students simply repeat grades when they fail (Mmbaga, 2002). Teacher training in Tanzania focuses on subject matter rather than teaching techniques (Cooksey & Riedmiller, 1997), and teachers are often hindered by classroom management issues due to the fact that “Classrooms designed for 45 children [end] up having 80 children” (Mmbaga, 2002, p. 61.) General education policy-makers in Tanzania are currently exploring a policy that would decrease the number of required student subjects from thirteen to six (Mmbaga, 2002), and this change would hopefully enhance the current system by allowing students to focus on gaining a deep understanding of the most critical subjects. Though the Tanzanian government is trying to improve public education by implementing these types of new policies, more extensive changes will have to take place both structurally and economically throughout Tanzania before its education system will truly be capable of serving every school-age student in the country (Mmbaga, 2002).

Separate schools for students with disabilities were created during Tanzania’s colonial period in the early 1900s, but because of a lack of educational and financial resources, special education programming has been slow to develop (Mmbaga, 2002). Efforts to create a special education system are hindered by the inability of both the
government and parents of students with disabilities to pay for them to attend special schools and “the incapacity of special schools to absorb school age children in need of special education services” (Mmbaga, 2002, p. 34). The average cost of educating a student with disabilities is 2.3 times more than the cost of educating a student without disabilities (Eleweke & Rodda, 2002), so the attitudes of the government and the general public tend to favor spending the already limited funds on general education. Legislation to promote Universal Public Education began to take effect in 1977 (Mmbaga, 2002), yet “The greatest challenge facing Tanzania today is whether the country can make substantial, qualitative progress towards the goal of EFA [Education For All], given the current state of affairs” (Mmbaga, 2002, p. 54).

The inclusion of students with disabilities in general education schools and classrooms has become an increasingly prevalent policy around the world in recent decades, and, despite its economic circumstances, Tanzania is no exception (Eleweke & Rodda, 2002). The idea of inclusion “has its foundation in the values and norms of the society, where every person regardless of the differences has dignity, equal opportunity, and respect” (Mmbaga, 2002, pp. 77-78), so inclusive practices are more readily accepted by the general public in Tanzania than in other parts of the world. Although the Universal Primary Education Act in 1977 and the Education Act of 1978 were authorized in an attempt to promote education for all students regardless of their abilities, the lack of resources and support from the government have made the implementation of these acts extremely challenging (Mmbaga, 2002). The majority of special schools and programs for students with special needs in Tanzania are supported by external non-governmental organizations, so “achieving Western models of inclusion...[remains] unrealistic”
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(Eleweke & Rodda, 2002, p. 119). As a result, although “inclusive education is embraced
in Tanzania, large class sizes, sheer numbers of children with disabilities and other
sources of difficulty in learning, non-participatory teaching methods and shortage of
teaching materials” (Mmbaga, 2002, p. 82) make it virtually impossible to effectively put
into practice.

United States

With the third largest and one of the most diverse populations in the world, the
United States faces many challenges in regards to providing reliable public services to
each of its citizens. However, the United States is also one of the most developed and
progressive countries in the world, and it boasts the world’s strongest economy (Sullivan,
2005). These national aspects of population, diversity, and economic resources have
played major roles in the development of the educational system in the United States.

In comparison to other countries, the educational system in the United States is
largely decentralized, and this decentralization is largely due to the way education in the
U.S. first developed. The first schools opened in the United States during the colonial
period. In 1642, school became compulsory in the Massachusetts Bay Colony, but the
educational system remained fairly unorganized until the 1840s. By this time, educational
leaders began to advocate compulsory education, and, by 1918, all states had passed
legislation requiring elementary education for every child. Eventually state laws requiring
secondary education developed, and most states currently require students to attend
school until age 16 (Picus, 2005). Although historically managed by local and state
authorities, the passage of the No Child Left Behind Act in 2001 strengthened the federal
government's educational influence by making schools more accountable to a nationally uniform set of educational standards (Hardman, 2006).

Though the special education program in the United States often serves as a model for other countries, it developed much later than general education. Schools for the deaf and dumb were established as early as 1817, but special education for students with other types of disabilities developed decades later (Garguilo, 2003). Edoard Seguin was one of the first leaders in special education in the United States. Seguin, a native of France, moved to the United States in 1848 and helped found the group that is now known as the American Association on Mental Retardation (Gargiulo, 2003). Though the Supreme Court's famous decision in Brown v. Board of Education in 1954 verified that every American student had the right to an equal education, most states did not officially require special education. During his presidency in the 1960's, John F. Kennedy appealed for increased funding for special education (Hardman, 2006), and “By the mid-1970s, the right to education had become a major national policy issue” (Hardman, 2006, p. 2). In 1973, school systems denied education to 1 million school-age children as a result of their disabilities (Horn & Tynan, 2001), and “more than half were not receiving an appropriate education” (Hardman, 2006, p. 2). In 1975, Congress passed Public Law 94-142, or the Education for All Handicapped Children Act that later became known as the Individuals with Disabilities Education Act (IDEA), a piece of legislation that transformed special education (Hardman, 2006). IDEA required that all students, including those with disabilities, receive a free education, and it mandated that the education appropriately fit the students’ needs (Katsiyannis & Conderman, 1995). Schools were thus required to educate students with disabilities in their least restrictive
environment, and they were expected to create an individualized education plan to fit each student’s specific educational needs (Hardman, 2006). In 1997, IDEA was amended to make schools and educators more accountable (Hardman, 2006), and the government began to officially recognize 13 disability categories (Gargiulo, 2003). These categories are “autism, deaf-blindness, developmental delay, emotional disturbance, hearing impairments including deafness, mental retardation, multiple disabilities, orthopedic impairments, other health impairments, specific learning disabilities, speech or language impairments, traumatic brain injury, and visual impairments including blindness” (Gargiulo, 2003, p. 10). Although states vary in their specific implementation of these disability categories (Gargiulo, 2003), “In 1999-2000, 6.1 million children ages 3 to 21 were found eligible for special education services” (Horn & Tynan, 2001, p. 37).

As the Individuals with Disabilities Education Act called for the education of students with disabilities in the environment most appropriate to fit their needs, it has come to regard “children with disabilities as general education first” (Hardman, 2006, p. 4), and inclusion has become an extremely prevalent issue in special education. School systems nationwide have been increasingly including students with disabilities in general education classrooms (Burnstein, Sears, Wilcoxen, Cabello, & Spagna, 2004), and “The percentage of students with disabilities served in general education classrooms has risen steadily” (Burnstein, Sears, Wilcoxen, Cabello, & Spagna, 2004, p. 104). In the 1998-99 school year, “47% of students with disabilities were educated for 79% or more of the school day in general settings...[and]...More than 95% of these students were educated in general education buildings” (Burnstein, Sears, Wilcoxen, Cabello, & Spagna, 2004, p. 104), and research has shown that students with disabilities in these inclusive classrooms
acquire “more academic and functional skills in a shorter period of time than when they were in separate classrooms” (Katsiyannis & Conderman, 1995, p. 280). Especially since the reauthorization of IDEA in 2004, the courts have tended to support the inclusion of students with disabilities in general education classrooms, and “inclusion appears to be increasingly embraced by state and local educational agencies” (Katsiyannis & Conderman, 1995, p. 281). Although adopted almost everywhere, schools may implement different types of inclusion. Some schools “are restructured so that students with disabilities are served only in general education classrooms” (Burnstein, Sears, Wilcoxen, Cabello, & Spagna, 2004, p. 108), while other schools adapt their programs in such a way that they are “continuing to educate students in separate special education settings but also increasing opportunities for inclusion” (Burnstein, Sears, Wilcoxen, Cabello, & Spagna, 2004, p. 109). Though inclusion has been adopted among school systems and seems to have many benefits, “the emphasis on educating individuals with disabilities in less restrictive environments, preferably in the general education classroom, has been a challenge” (Katsiyannis & Conderman, 1995, p. 284). General educators often feel unprepared to teach students with disabilities (Cook, Gerber, & Semmel, 1997), and states feel under-funded in regards to special education (Katsiyannis & Conderman, 1995). While some studies suggest that inclusion does not promote the learning of students with disabilities (McLeskey, Hoppey, Williamson & Rentz, 2004), it seems as if the positive effects of inclusion “depend…on changing the perceptions of educators” (Burnstein, Sears, Wilcoxen, Cabello, & Spagna, 2004, p. 114). Even though many countries now look to the United States as a model of inclusionary practices, effective inclusion in the U.S. remains a work in progress.
Conclusions

Though the countries included in this review differ historically, economically, governmentally, and educationally, many similarities can be found in their overall development of inclusive education. For example, the inclusive programs in these countries seem to have followed a similar pattern of development in which government policy initially placed students with disabilities in separate special education schools, later moved them to separate special education classrooms within general education schools, and eventually placed them in general education classrooms. While countries differ in their current position in this progression, the progression itself seems to remain relatively constant from place to place. Another similarity regarding inclusion among the included countries is the significant influence that societal attitudes have on its implementation and success. In countries like Costa Rica, China, and Tanzania, the concept of inclusion naturally reflects the collective attitudes of society. In Costa Rica, this relationship between societal attitudes and inclusion seems to have advanced inclusion’s development. In China and Tanzania, however, other factors such as a lack of resources, a competitive educational system, and a huge number of children seem to have overshadowed the positive societal attitudes toward inclusion and have hindered inclusion’s success. These challenges present another similarity found among the countries included in this review, as almost all of these countries noted a shortage of resources and a lack of qualified personnel as the most prevalent barriers to effective inclusion. In addition to societal attitudes, teacher attitudes also play a role in the development of inclusion in many of these countries. General education teachers in multiple countries reported feeling stressed and unprepared when attempting to include
students with disabilities in their classes, though their attitudes seem to improve if they begin to see the students’ progress. Multiple countries are also beginning to identify students with disabilities by their educational needs rather than disability categories, and it seems like this might be the next major issue facing educators and policy makers. Although the actual structure of inclusion differs around the world, it is interesting to note the numerous similarities regarding its development among countries that may initially seem extraordinarily different.
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