Addressing the Inclusion Imperative: An Urban School District's Responses

David Edward DeMatthews
University of Texas at El Paso
&
Hanne Mawhinney
University of Maryland, College Park
USA

Abstract: Over the past forty years, schools across the United States have become more inclusive for students with disabilities. However, in many high-poverty urban school districts, a disproportionate number of minority children with disabilities are segregated from their non-disabled peers. This article presents findings from a qualitative case study of one urban school district implementing special education-related inclusion reform over the course of four years. The district had a history of segregating students and numerous compliance issues with special education mandates; however, the arrival of a new superintendent brought new hopes for change. The authors argue that existing research regarding inclusion has typically ignored the policy implementation processes employed by school districts in establishing more inclusive schools and improved special education programs. This article provides a case description of a district's special education inclusion policy implementation process, the challenges district administrators were confronted with, and the positive and negative outcomes of the district's policies. The findings inform next-generation policy initiatives and future lines of inquiry.
Keywords: special education; inclusion, urban education, policy, school districts

Abordando el imperativo de la inclusión: respuestas de un distrito escolar urbano.
Resumen: Durante los últimos cuarenta años, las escuelas de los Estados Unidos se han vuelto más inclusivas para estudiantes con discapacidades. Sin embargo, en muchos distritos escolares urbanos de alta pobreza, un número desproporcionado de niños de minorías con discapacidades son separados de sus compañeros no discapacitados. Este artículo presenta los resultados de un estudio de caso cualitativo de un distrito escolar urbano que esta implementando una reforma de inclusión relacionada con la educación especial durante cuatro años. El distrito tiene una historia de segregación de estudiantes y numerosos problemas de cumplimiento con los mandatos sobre educación especial, sin embargo, la llegada de un nuevo superintendente trajo nuevas esperanzas de cambio. Los autores argumentan que la investigación existente sobre la inclusión ha ignorado generalmente los procesos de aplicación de las políticas empleados por los distritos escolares en el establecimiento de escuelas más integradoras y programas de mejora de la educación especial. Este artículo proporciona una descripción del proceso de implementación de políticas de inclusión de educación especial, los retos que enfrentan los administradores del distrito, y los resultados positivos y negativos de las políticas del distrito. Los resultados sugieren elementos para pensar futuras iniciativas políticas para la próxima generación y líneas de investigación**.**
Palabras clave: educación especial; inclusión; educación urbana,; política; distritos escolares

Atendendo ao imperativo da inclusão: respostas de um distrito escolar urbano.
Resumo: Durante os últimos 40 anos, as escolas americanas tornaram-se mais inclusivas para alunos com necessidades especiais. No entanto, em muitos distritos escolares urbanos com altos índices de pobreza, um número desproporcional de crianças de minorias com deficiência são separados de seus colegas sem deficiências. Este artigo apresenta os resultados de um estudo de caso qualitativo de um distrito escolar urbano que está implementando uma reforma de inclusão relacionada a educação especial durante quatro anos. O distrito tem uma história de segregação de alunos e inúmeros problemas de conformidade com mandatos de educação especial, no entanto, a chegada de um novo superintendente trouxe novas esperanças de mudança. Os autores argumentam que pesquisas existentes sobre a inclusão tem geralmente ignorados os processos de implementação de políticas dos distritos escolares na criação de escolas e programas mais abrangentes para melhorar a educação especial. Este artigo fornece uma descrição do processo de implementação de políticas, incluindo a educação especial, os desafios enfrentados pelos administradores distritais, e os resultados positivos e negativos das políticas distritais. Os resultados sugerem razões para pensar futuras iniciativas políticas para a próxima geração e linhas de pesquisa.
Palavras-chave: educação especial; inclusão; educação urbana; distritos políticos

Introduction

For almost forty years, federal special education policy mandates have directed U.S. school districts to create policies and structures that increase access to the general education classroom for students with disabilities. The Least Restrictive Environment (LRE) component of the *Individuals with Disabilities Education Improvement Act of 2004* (IDEA, 2004) is the primary legal impetus for establishing inclusive schools that meet the needs of students with disabilities. More recently, an additional federal mandate that focused on student achievement increased expectations on districts and their schools. The 2001 reauthorization of the *Elementary and Secondary Education Act* (ESEA) (also known as the *No Child Left Behind Act)* holds schools and school districts accountable for student achievement. ESEA also established a subgroup for students with disabilities to assess whether schools achieve adequate yearly progress (AYP). Both mandates are monitored by the U.S.

Department of Education and individual state departments of education. Schools and districts that fail to meet policy expectations face the possibility of serious sanctions and interventions. In sum, these policies have established a context that prompts districts to improve their special education programming.

The positive impact of IDEA is undeniable. Students with disabilities are now more likely to be included in the general education setting than their peers thirty years ago, but disparities still exist. Although judging the positive impact of ESEA has been more controversial, ESEA's 2001 reauthorization has made data more transparent, providing advocates of students with disabilities with additional information to address inequities. Moreover, researchers have consistently identified racial and class disparities in special education identification, placement decisions, and student outcomes (Artiles & Trent, 1994; Blanchett, 2009; Donovan & Cross, 2002; Harry & Klinger, 2006; Hosp & Reschly, 2004; Losen & Orfield, 2002; O'Connor & Deluca Fernandez, 2006; USDOE, 2008). For example, African-American students and poor students identified as having a disability are more likely to be placed outside of the general education classroom than their counterparts (USDOE, 2008). Many of these students attend urban public schools in cities that have a record of long-standing failures in the area of special education. Special education class action lawsuits highlight the persistent and systemic failure of many urban school districts across the United States. (See: Baltimore City Public Schools: *Vaughn G. v. Mayor and City Council of Baltimore;* Chicago Public Schools: *Corey H. v. Board of Education of Chicago;* District of Columbia Public Schools: *Blackman/Jones v. District of Columbia;* Newark Public Schools: *M.A. v. Newark Public Schools;* San Francisco Unified School District: *Chambers v. SFUSD*).

Despite long-standing special education failure in urban public school districts, researchers have rarely examined district-level policies regarding special education and inclusion (MacKenzie, Skrla, Dickinson, & Joseph, 2011; Morse, 2010; Nilsen, 2010; Watnick & Sacks, 2006). Instead, researchers have focused on other important aspects of inclusion, such as school leadership (Billingsley, Gersten, Gillman, & Morvant, 1995; Guzman, 1997; Hasazi, Johnston, Liggett, & Schattman, 1994; Mantle 2005; Walther-Thomas & DiPaola, 2003; Will, 1986), teacher perceptions and preparation (Hersman & Hodge, 2010; Tankersley, Niesz, Cook & Woods, 2007; Watnick & Sacks, 2006), and small learning communities (Duke & Lamar-Dukes, 2007). These studies provide critical information that can inform practitioners at a school-level; however, examining a district's response to important special education mandates is beyond the scope of these studies. Whether urban school districts are effectively responding to inclusion mandates remains unclear and requires investigation. Unpacking the policies and structures that exist within urban districts may allow researchers to better understand and explain the inequitable outcomes for students with disabilities.

The purpose of this article is to unpack and analyze the process of special education policy implementation within one large urban school district suffering from historic failures in special education programming and implementation. Specifically, this article focuses on a number of inclusive reforms formulated by this district between 2007 and 2011 under the leadership of a single superintendent to demonstrate how school districts are responding to federal policy mandates that require districts to provide students with disabilities appropriate access to the general education classroom or the least restrictive environment (LRE). The authors will highlight the realities, constraints, and challenges that burdened the district in creating more inclusive schools for students with disabilities. By breaking down the process through which the district's inclusion reform was implemented, a clearer picture emerged regarding the types of policies that contribute to or limit the development of inclusive schools in historically inequitable districts. This study focuses specifically on the actions, policies, and practices of the school district and central office administrators and not the experiences of schools, principals, teachers, or students.

Literature Review

The literature on inclusion reform demonstrates that programs vary in terms of overarching goals, degree of inclusivity, and degree of implementation at the school level. While we know about the features of effective inclusion programs at the school level, we know little about how school districts develop and implement such programs in part because the literature base on policy implementation is limited in scope. Despite a paucity of empirical research, a review of literature related to inclusion implementation identified four relevant areas of focus: (a) defining inclusion according to IDEA and US courts; (b) providing an overview of competing inclusion definitions throughout the field; (c) progress and inconsistencies of special education and inclusion implementation; and (d) a review of research focused on district policy implementation of inclusion.

Inclusion According to IDEA and US Courts

Part of what makes inclusion a challenge for districts is the lack of a universally accepted definition or narrowly defined policy at the federal level. The word 'inclusion' does not exist in IDEA and is rarely used in case law. The legal impetus associated with inclusion is described in the LRE component of IDEA and subsequently clarified through the process of judicial review. The text of IDEA describes the LRE as follows:

> to the maximum extent appropriate, children with disabilities . . . are educated with children who are not disabled; and special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disability of a child is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily. (IDEA, 2004, Sec. 300.114)

The LRE is described in a student's Individualized Education Program (IEP), which defines a student's individualized learning goals, the appropriate services required for the student to meet the goals, and the placement where the student will receive services. The LRE component of IDEA does not assume that placement will always be in a general education classroom. The excerpt above provides a preference for inclusion in the general education classroom, but phrases such as "to the maximum extent appropriate" and "achieved satisfactorily" allow IEP teams (comprised of parents, teachers, service providers, and the student, if appropriate) to determine the extent of inclusion appropriate for a student. Moreover, IDEA (2004) also states that "Each public agency must ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services" (Sec. 300.114). For many districts, this excerpt equates to a mandate that a policy of full inclusion (having all students attend class in the general education classroom) would be illegal under the IDEA. Figure 1 is an example of a continuum of placement options for students with disabilities.

Courts have provided further clarification of the law and created additional leeway for districts in the area of inclusion rather than pushing districts to establish more inclusive schools. In *Hartmann v. Loudon County* (1998), a US District Court held that:

> [t]he mainstreaming provision (in IDEA) represents recognition of the value of having disabled children interact with non-handicapped students. The fact that the provision only creates a presumption, however, reflects a congressional judgment that receipt of such social benefits is ultimately a goal subordinate to the requirement that disabled children receive educational benefit.

The court also held that schools had the right to regulate the degree of inclusion on a case-by-case basis and specifically when "the [student with a disability] is a disruptive force in the non-segregated setting" (*Hartmann v. Loudon* decision quoting *Roncker v. Walter*, 1983). Likewise, two federal court

decisions favored the districts' preference to educate students with disabilities in more restrictive placements despite parents' demands for a placement in the general education classroom (see *Poolaw v. Parker Unified School District*, 1995; *School District of Wisconsin Dells v. Z. S.*, 2002). To date, no federal appellate court has ever held that inclusion in the general education classroom was required or a right of any or all students with disabilities.

	Placement Options
More Restrictive ⇒⇒⇒	Residential or Hospital Program: Students receive specialized instruction and other supports twenty-four hour per day. These students have special needs that include social, emotional, physical, health related, and/or emotional needs.
	Special Day Schools: Students attend a school that does not include any students without IEPs. Special Day Schools often offer a therapeutic learning environment and provide instruction and support to student with moderate to severe behavioral, physical, or emotional disabilities.
	Self-Contained Classrooms: Students attend a regular public school with general education students but receive specialized instruction separate from students without IEPs. Students do not receive instruction in the general education classroom.
Less Restrictive	Resource Rooms/Pull-Out: Students are pulled out of the general education classroom for a portion of the school day to receive specialized instruction in a separate room with fewer students. Students still spend part of their day in the general education classroom.
⇓⇓	General Education Classroom: Students are educated in the general education classroom with support of a special education teacher and/or collaborative planning between special education teacher and general education teacher.
Note: Each placement option can look different and be more or less restrictive based on the program and options created or available to the school. For example, students in a self-contained classroom could take physical education or eat lunch with their non-disabled peers but receive all academic instruction in a self-contained classroom.	

Figure 1. Model of the Continuum of Placements

Overview of Competing Inclusion Definitions

The broad language in IDEA along with court decisions have created room for districts, schools, and IEP teams to place students in more restrictive placements, particularly when they are disruptive to the general education classroom. Yet, many scholars maintain divergent but principled opinions of how inclusion should be defined and implemented. More progressive definitions of inclusion frequently draw upon case law as well. The overturning of the "separate but equal" doctrine in the 1954 landmark decision of *Brown v. Board of Education* has led many to argue that students with disabilities have the right to equitably access all aspects of public education, including the general education classroom for the specific reason that separate is not equal.

A continuum of inclusion definitions has been presented in the field of special education and social justice work, but no clear consensus has emerged. Katzman (2007) defined inclusion as "an educational philosophy that calls for schools to educate all learners – including students with disabilities and other special needs – together in high quality, age-appropriate general education

classrooms in their neighborhood schools" (p. 129 in Bursztyn). Stainback and Stainback (1990) defined an inclusive school as

> one that educates students in the mainstream... providing appropriate educational programs that are challenging yet geared to their capabilities and needs as well as any support and assistance they and/or their teachers may need to be successful in the mainstream. (p. 3)

Inclusive schooling, according to Slee (2005), "is not the adaptation or refinement of special education. It is a fundamental rejection of special education's and regular education's claims to be inclusive. Inclusion demands that we address the politics of exclusion and representation" (p. 164). Uldarvi-Solvner and Kluth (1997) further addressed the politics of exclusion:

> Inclusive schooling propels a critique of contemporary school culture and thus, encourages practitioners to reinvent what can be and should be to realize more humane, just and democratic learning communities. Inequities in treatment and educational opportunity are brought to the forefront, thereby fostering attention to human rights, respect for difference and value of diversity. (p. 142)

Other definitions of inclusion are more pragmatic in nature, recognizing the current context of public education. For example, Osgood (2005) described inclusion in the real world as "more of an ideal than an idea, one to which schools should continually aspire but also one that remains unobtainable in the foreseeable future" (p. 200). Regardless of stance, a variety of inclusion definitions exist, which are often linked to values of equity, social justice, politics, and pragmatism. To add to the variability, other terms such as mainstreaming, integration, and full inclusion create additional conflict and ambiguity. The concept of inclusion is also nuanced with other aspects of special education. For example, does special education include "gifted and talented" students, and should these students be educated in segregated programs? Many programs that serve students who are hearing impaired promote a Deaf culture. If students with hearing impairments are educated in general education settings will they be able to foster a Deaf culture? Thus, concepts of inclusion are complex, multidimensional, and challenging to characterize (Riehl, 2000; Salisbury, 2006; Sands, Adams & Stout, 1995).

Ainscow et al. (2006) categorized two types of inclusion definitions: descriptive and prescriptive. A descriptive definition is narrow and focused on how inclusion should be used in practice. A prescriptive definition may focus on a particular aspect of inclusion such as including a specific group of students. A prescriptive definition is broad, often idealistic, and can be rooted in moral arguments that take on feel-good rhetoric. Armstrong, Armstrong, and Spandagou (2011) identified a third definition category of inclusion, fragmented, which includes elements of descriptive and prescriptive definitions. To date, researchers have not sought to analyze district inclusion policies.

The inclusion debate has been raging for decades among scholars, but school districts have clearly been provided with a great deal of flexibility in drafting inclusion policies and programs. What has emerged is a hodge-podge of practice and policy across states, districts, and schools that have contributed to disproportionality, misidentification, and inequitable outcomes for students with disabilities, particularly if the student is living below the poverty line or is a member of a marginalized racial or ethnic group.

Inclusion Implementation and Inconsistencies

Scholars have long debated the benefits of including students with disabilities in the general education classroom. Some research has indicated that inclusion of students with disabilities is socially and academically beneficial to all students, whereas others have argued that full inclusion

regardless of circumstances is harmful to students with disabilities and their non-disabled peers (Kauffman, 2002; Kauffman & Hallahan, 1995; Sailor & Rodger, 2005). Without a consensus in the field, inclusion remains a hot topic but one that lacks specific guidance for districts. However, advocates of inclusion have stronger claims for integration given the inequities that have arisen along racial and class-based lines.

Educational research focused on inclusion implementation has revealed the variability of inclusion in practice. At the national level, schools have made tremendous progress with inclusion over the past forty years. The Office of Special Education Program's (OSEP) annual report to the U.S. Congress (2008) indicated that the national percentage of students with disabilities educated in general education classes for most of the day (outside of the general education classroom for less than 21% of the day) had increased from 46.5% in 1997 to 53.7% in 2006, whereas the percentage of students with disabilities educated outside the regular class from 21% to 60% of the day decreased from 20.4% in 1997 to 17.6% 2008 (p. xxi). IDEA continues to have a powerful influence on school reform, but findings at the district and school levels are more complicated and inconsistent.

The degree to or intensity in which schools implement inclusion has been found to vary tremendously from school to school even if schools are in the same district (Carter & Hughes, 2006; Salisbury, 2006). Moreover, racial and socioeconomic backgrounds of students are indicators of inequality in special education (Blanchett, 2009; Harry & Klinger, 2006; Losen & Orfield, 2002; USDOE, 2008). The OSEP (2008) noted that African-American students and poor students identified as having a disability were more likely than their counterparts to be placed outside of the general education classroom and more likely to be labeled in categories for emotional disturbance and intellectual disabilities (formerly classified under IDEA as mental retardation). Numerous scholars have argued that district-level policies and structures have created structural biases and inequalities that contribute to disproportionality, misidentification, and inequitable outcomes (Darling-Hammond, 1995; Harry & Klinger, 2006; Oakes, Franke, Quartz, & Rodgers, 2002). As noted earlier, numerous urban school districts serving high proportions of minority and poor children are under federal court supervision for failing to appropriately enact the mandates prescribed in IDEA.

District-Level Implementation Research

School districts are often viewed as "midlevel policy actors in the implementation chain" (Datnow, 2006, p. 120) located between local schools and the state and federal department of education. From this organizational position, districts play an important role because they are responsible for learning about external policy expectations and communicating these expectations to schools (Miller, 2010). In reference to special education, local school districts make sense of policy mandates from their state departments of education and from the U.S. Department of Education to communicate expectations to schools. Districts are monitored and tracked with regard to numerous indicators, many focused on outcomes of special education programs and the equitable placement and identification of marginalized students. Those districts under court supervision are also required by law to follow consent decrees and other legally binding contracts with courts and plaintiffs to make progress in improving their special education programs and to address inequities. Furthermore, school districts play a critical role in successfully implementing state and federal policy (Berman & McLaughlin, 1977) along with court-mandated reforms because they provide professional development, funding, curriculum, school supervision, teacher recruitment, and internal policies and programs that influence the implementation of a policy.

Although it is widely recognized that districts play an important role in school reform, district administrators and their central office bureaucracies in educational research are often described as implementation curbs that fail to provide adequate resources or revise policies to support improved policy implementation (Honig & Venkateswaran, 2012). For example, researchers have noted that districts often fail to move away from top-down management with local schools and in doing so, fail to provide schools with the ability to establish meaningful change (Walker, 2002). However, not all research has described district-level work as ineffective or disruptive to schools. District administrators have been found to help establish important opportunities to increase teachers' and principals' knowledge of school improvement programs and ideas (Corcoran, 2003). Districts can also provide a selection of pre-identified or pre-screened research-based programs for schools to consider and adapt (Datnow, 2000) although the argument could be made that pre-screening at the district level is problematic. Research has also indicated that district administrators can support schools in their ability to use data. For example, district staff have been found developing data reports associated with student achievement data for teachers and principals; these reports often included a preliminary analysis of findings to point school staff in the right direction (Halverson, Grigg, Pritchett, & Thomas, 2007; Kerr et al., 2006).

District-level data collection and analysis can also be used internally to drive district-level policy decisions. Wohlstetter, Datnow, and Park (2008) concluded that districts create data systems to examine issues related to school performance. The district may then share the information or the district may use data to craft policies or select programs or supports to be implemented at the school level. In other instances, central office administrators worked between the district and schools to collect evidence related to school progress implementing particular initiatives and then used that information to inform central office policies and reforms (Honig, 2003, 2006).

In the past decade, educational research focused on policy implementation at the district level has primarily focused on issues related to high-stakes accountability and data-driven decision making (Coburn & Talbert, 2006; Datnow, Park, & Wholstetter, 2007; Honig & Coburn, 2008; Miller, 2010). Few empirical studies have focused on issues related to special education and inclusion (Harry & Klinger, 2006; Huberman, Navo, & Parris, 2012; McKenzie, Skrla, Dickinson, & Joseph, 2011; Watnick & Sacks, 2006), leaving numerous questions unanswered. For example, are inclusion policy mandates being handed down from district administrators to schools that lead to immediate inclusion or are policies more gradual in nature? How do school districts define inclusion? Do districts choose to focus on particular disability groups for purposes of inclusion? What types of data systems are used, and how are data shared with schools? How are districts promoting inclusion, if at all? A review of this research is helpful in broadly sketching how districts have responded to special education and inclusion mandates despite the emerging field's limited ability to provide consensus or depth of knowledge.

Districts can develop priorities and policies that promote inclusion at the school level. In a study of California school districts serving high poverty student populations, Huberman, Navo, and Parish (2012) found that each district that significantly closed the achievement gap between students with IEPs and their peers promoted inclusion at a district level by advocating for increased access to the general education classroom and providing professional development support to schools. At a general level, this study revealed that district priorities and instructional support can promote inclusion and academic success for all students, but since the study focused primarily on identifying broad policy priorities for special education, the study was unable to describe in detail the policies and structures developed and implemented by the district.

Some of the details of how districts promote policies of inclusion are described in the literature. For example, districts with vocal and engaging district administrators promote inclusion

through advocacy work. MacKenzie et al. (2011) found that the superintendent and the school district can help establish organizational expectations and structures that allow school leaders and teachers to establish inclusive programs focused on high academic outcomes for all students. The superintendent played a vital role in stimulating special education and inclusion reform by building relationships with key stakeholders, publicly displaying personal values, and shielding schools from political pressure. Other district leaders played an important role in setting high expectations for all students to be successful, holding principals accountable for all students' achievement results, and redefining central office instructional roles to better support local schools. Schools were also given increased autonomy to craft their own plans rather than a one size fits all district-wide approach. Finally, districts provided professional development and instructional support for teachers to improve because they recognized that inclusion required effective teaching.

District policies can also use incentive programs to increase schools' inclusivity. Watnick and Sacks' (2006) investigation of teacher perceptions of inclusion provided a snapshot of Miami-Dade County Public Schools' (MDCPS) inclusion policy "*All Students, All Schools.*" The program encouraged school innovation and collaboration for students with disabilities. MDCPS schools were encouraged to develop grants with measurable outcomes that focused on the following areas: (a) increasing the percentage of students with disabilities who spend 80% or more of their school day in the general education classroom; (b) utilizing research-based effective practices; (c) demonstrating collaborative activities; and (d) creating curricular, instructional, and assessment adaptations that promote achievement. Professional development and training were provided over two days for schools that participated in the grant.

What is interesting about MDCPS' inclusion program is the emphasis placed on increasing the percentage of students who spend 80% or more of their school day in the general education classroom. Although some schools in MDCPS were successful in providing more students with disabilities access to the general education classroom, the district's emphasis on the 80% indicator may not have directed schools to examine inclusive practices for all students but rather only for particular students who already had access to the general education classroom for some portion of the school day. What remains unclear is whether schools, principals, and teachers ignored particular groups of students with disabilities who may have been in full-time self-contained settings or separate schools or may have receive very little access to the general education classroom prior to the new policy initiative. One could easily foresee stakeholders consciously or subconsciously ignoring particular groups of students with specific disabilities types, such as students with severe cognitive disabilities, to focus on students who could be easily transitioned to a placement in the general education classroom for 80% of the school day. The questions that arise from this research highlight the importance of district-level policy language and how success is measured.

Central City Public Schools

Central City Public Schools (CCPS) is a large urban school district located in the United States with approximately 125 schools including separate special education schools that enroll only students with more severe disabilities. The students served by the district are African American (69%), White (16%), Hispanic or Latino (13%), and Asian (2%). Sixteen percent of CCPS students are classified as students with a disability. CCPS distinguishes itself from other districts because of its historic failure to appropriately implement IDEA requirements and more recently meet accountability expectations for the subgroup defined as students with disabilities.

Regarding the district's failure to implement IDEA, the district had been involved in three long-standing special education class action lawsuits pending in federal court. After a judge ruled

that CCPS had not fully or appropriately implemented aspects of IDEA, a consent decree, i.e., an agreed upon settlement between the judge, district, and plaintiffs, was developed. The consent decree included numerous steps to improve special education programs and other aspects of IDEA implementation. Table 1 below provides a general description of each class action lawsuit. It is important to note that only general descriptions are provided of each case for purposes of anonymity and brevity, but that the courts identified numerous problems in IDEA implementation that were consistently addressed in status hearing, many pertaining to inclusion. A report filed by a court-appointed researcher documented the pervasive non-implementation of IDEA within CCPS:

> Due process complaints in [CCPS] typically raise basic legal compliance issues under IDEA with respect to evaluations and the development of appropriate IEPs, claims of [CCPS's] failure to implement earlier HOD/SAs, and claims of the denial of a Free and Appropriate Public Education ("FAPE") associated with the above legal breaches or schools' failure to implement required IEP services.

In sum, the district had problems providing transportation for students with disabilities, completing IEPs and evaluations in a timely fashion, providing related services and specialized instruction listed in IEPs, allowing students and their parents due process, providing services for students with IEPs while in the juvenile justice system, and various other aspects of IDEA.

Table 1
Class Action Lawsuits against CCPS

Case	Judgment of the Court	Settlement Provisions	Status
Suit 1	Failure to respond to students' and parents' requests for administrative due process hearings pursuant to IDEA and failing to implement hearing officer decisions; failure to provide transportation when documented in IEP.	Issue and implement HODs and SAs in a timely manner; maintain an accurate data system; maintain a parent service center; revise principal and teacher evaluations; provide compensatory education for class members; pay attorney fees.	Some aspects of the settlement provisions have been met; others have not.
Suit 2	Failure to provide a free and appropriate education (FAPE) for children in the juvenile justice system.	Required CCPS and the state's department of corrections to provide general education and special education services to inmates.	Resolved as of 2009.
Suit 3	Failure to consistently to pay the costs of special education placements or related services to private providers, either fully or on a current or timely basis, as required under IDEA.	Implement transportation plan agreed upon by court, plaintiffs, and district; payment of attorney fees.	Resolved as of 2012.

CCPS' progress in providing high quality special education to students was not only questioned by the court and plaintiffs but also by the state department of education, the US Department of Education and the general public. Publically reported assessment results from 2009 revealed that only 16% of elementary students with disabilities met proficiency on state-mandated reading assessments, whereas the proficiency rate for all students was 44%; highlighting a 28% achievement gap between students with disabilities and their non-disabled peers. CCPS was failing to meet state expectations for performance in the subgroup of students with disabilities. In

addition, both the state department and US Department of Education were monitoring the district for issues related to disproportionality and misidentification issues related to race. The district was highly segregated, which was evident in the six special education schools the district maintained: three schools were designated solely for students with emotional disturbances and other behavioral problems, two schools were designated for students with severe intellectual disabilities and traumatic brain injuries, and one school was designated for students with specific learning disabilities.

The district operated a variety of self-contained programs for students in the following disability categories: autism, emotional disturbance, intellectual disturbance, and deaf/deaf-blind. IEP teams at local schools frequently determined that they could not serve a student and sent the student to non-public schools or residential facilities. Some placements cost the district more than one hundred thousand dollars per year per student, not including transportation costs. An enormous portion of the overall district budget was used to pay for non-public placements, residential placements, and transportation costs. Finally, most schools had a resource room available for students with the possibility of inclusion for some students depending on the school's budget allocation and the principal's determination of how teachers would be assigned and scheduled to classrooms and grades. In 2007, of the district's estimated 8,500 students with disabilities, approximately 2,400 attended non-public schools or lived in residential facilities primarily because the district did not have appropriate programs located in neighborhood schools. Thus, more than a quarter of all students with disabilities in the district were in the most restrictive placements (non-public and residential facilities) described by IDEA; this number did not include students enrolled in full-time self-contained programs located inside neighborhood schools or district-operated special education schools[1].

Methodology

This article draws on evidence from a qualitative multi-case study of five K-5 and K-8 elementary school principals working in one urban school district (Author, 2012). In the larger study, the researcher sought to examine how school leaders made sense of and enacted district-level inclusion policies. The purpose of this study was to map out and examine how CCPS implemented district-wide initiatives to create more inclusive schools and highlight the challenges that arose during policy implementation. The research study described above is a politically important case (Creswell, 2007; Miles & Huberman, 1994) because this was a high-profile urban school district under federal court supervision. Across the US, other large urban school districts are confronted with similar contexts and issues. However, given the political and legal nature of this research, it is important to point out that anonymity of the district and leaders is of vital importance; all names were changed or removed and data were scrubbed to eliminate traces of evidence that could reveal the district's identity. Furthermore, the study is limited in terms of data collection and reporting due to the highly political and legal nature of this case.

Data collection included school observations of principals, teachers, and staff working in collaboration to implement inclusive reforms, district-level observations at principal professional development sessions, and in-depth interviews with principals and district staff about district

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[1] Parents did not always want their child to attend non-public schools but once the IEP team agreed on particular services, if the district could not provide those services in the neighborhood school, the student would be enrolled in a non-public school. It is worth noting that many parents were happy with non-public placements for their child. One district administrator explained the phenomena: "Some of our schools, I mean the high schools and middle schools especially, have such bad reputations; they [parents] think that any other option is better. Anything to get the kid out of the neighborhood, for some of these parents, is a win." Thus, a lot of parents that were in high-poverty, high-crime communities were happy about having their child in a non-public placement.

policies. Documents were collected from the schools participating in the study and from the school district including the Office of Special Education. Additional documents including policy documents, district memos, press releases, and training presentations from 2007-2011 were collected and analyzed.

The data were continuously analyzed throughout the course of the study. The data analysis process began by reading observation notes, district and school documents, interview notes, and interview transcripts and by writing analytic memos and summary notes on the information acquired from these sources. Two critical friends, both school administrators in the district, were used to identify gaps in data, construct alternative interpretations, and assess the validity of the conclusions. Additional analytical memos were maintained over the course of the study to track researcher biases, developing thoughts, and important themes that emerged from the data. Then, data sources were coded by specific district-level policies and events were coded by time to develop a detailed case narrative. A secondary coding structure was then employed to draw comparisons and identify emerging themes across data sources (Creswell, 2007). Triangulation between data sources, member checks, and critical friends were employed to enhance the trustworthiness of the findings in this study.

Findings

Phase 1: July 2007-December 2008

In the summer of 2007, when the new superintendent of CCPS took office, special education became a top priority. In part, special education was a priority because the city's mayor, who had control over the school district, framed inclusion as a legal mandate. A policy document generated by the Office of the Mayor captured the mayor's framing of inclusion:

> Inclusion of special education students in regular classrooms in their neighborhood schools must be the guiding principle of all special education related policies and procedures. It is the law and it has been proven effective in improving student achievement. All levels of CCPS from high-level managers to frontline employees must be focused on the goal of inclusion for special education students. We must create an environment where inclusion is the rule instead of the exception.

One important caveat that came with the mayor's support for inclusion was a focus on cutting costs specifically in the area of non-public enrollment and transportation. Although neither the mayor nor other district leaders ever publically connected budget cuts and a reduction in the use of non-public facilities to inclusion, city budget documents provided evidence of such a connection. The city had significant budget shortfalls, and in multiple "*Annual Budget Gap Closing Plan"* documents, the mayor identified significant cuts to special education funds with a specific focus on the amount of tuition paid to non-public schools and special education transportation.

Both the superintendent and director of special education became leading voices in advocating for inclusion and improvements in IDEA implementation. Local media reported press releases and testimony before the City Council and federal courts. The superintendent shared her focus on inclusion during a hearing early in 2008:

> As we continue to strive for significant improvements in student achievement we cannot lose sight of the perpetual neglect special education students have endured for decades… Providing quality special education services means more than settling court cases; welcoming every student back into the classroom with an inclusive learning environment is still our number one priority.

The director of special education testified to the City Council with the following statement:

Inclusion and integration are no panaceas. However, they are necessary prerequisites to ending the cycle of poor special education practices and replacing them with better ones. The consequences of these statistics test not only our educational system, but also our juvenile justice, human services and business sectors…The tenets of inclusion even for the most open-minded people are sometimes difficult. At times, they challenge my beliefs. What does inclusion mean for Alex and his family to trust that Alex will be a valued member of his class where he is the only student with a cognitive disability? Likewise, what does it mean when Erica, Alex's nondisabled classmate, complains to her mother that Alex is slowing her class down? Can we have students with emotional disturbances learn alongside their peers without sacrificing precious class time? Do our facilities provide medically fragile students with the opportunities to be in their neighborhood schools? Won't my child, whether disabled or not, turn away from school and learning? The one thing I know for sure is that we cannot confuse the complexity of the job that these questions raise, with our ability to do it.

District staff, school leaders, and teachers heard these messages throughout professional development sessions, via district-wide emails, and through local media outlets. One principal praised their advocacy:

When you see [the director of special education and superintendent] making these speeches or sharing these ideas you are moved. You want to do this work. It's exciting. I'm excited about working for people who want this to happen. It's been a long time coming for me.

Although these statements were important in shaping the mission and vision of the district for school leaders and staff, the policies and standard operating procedures in schools, which drove practice in schools, still required clarification for implementation at the school level. The first year and a half of the superintendent's tenure was focused on reorganizing the Office of Special Education to support the reforms described later in this article. Figure 2 provides an organizational chart of the Office of Special Education and those involved in the special education process.

The director of special education reported directly to the superintendent (many large districts have a director of special education that reports to the Chief Academic Officer). The Office of Special Education was comprised of multiple teams including the following: (a) a compliance team that supported schools with overdue due process complaints or unresolved settlement agreements; (b) an early childhood team dedicated to identifying students with disabilities; (c) a Medicaid team focused on recovering funds through Medicaid reimbursement; (d) a policy development team focused on developing special education policy and providing monthly special education training; (e) a non-public team that managed caseloads of students in non-public and residential schools; and (f) an operations team focused on running the office and ensuring programs such as extended school year (ESY) programs were successfully implemented. The office also partnered with the Office of Data and Accountability to analyze data for progress monitoring and the Office of General Counsel to support the district's efforts in class action suits, hearing officer decisions, and policy development. A senior level leader in the Office of Special Education described the environment:

It's so crazy around here. There is so much silo-ing with everybody working on their own projects. People don't share resources and often find out that more than one team is working on the same thing. People aren't talking enough. There is just so much going on and everyone is in a big rush to clean up all the compliance issues that we aren't working smart.
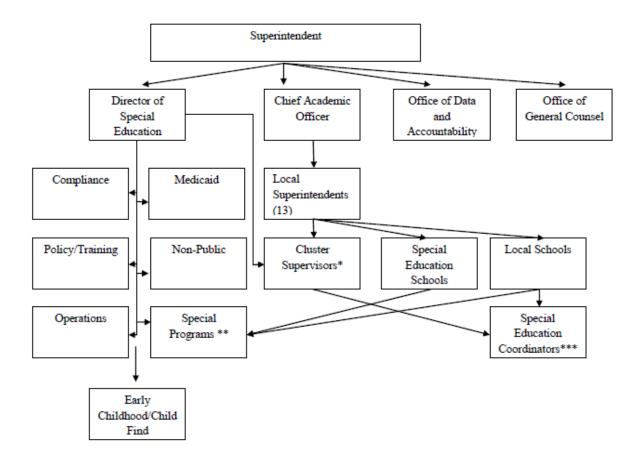
Superintendent

Director of Special Education — Chief Academic Officer — Office of Data and Accountability — Office of General Counsel

Compliance — Medicaid — Local Superintendents (13)

Policy/Training — Non-Public — Cluster Supervisors* — Special Education Schools — Local Schools

Operations — Special Programs ** — Special Education Coordinators***

Early Childhood/Child Find

Figure 2. CCPS Special Education Organizational Chart
* Cluster supervisors are managed by the Director of Special Education and by Local Superintendents
** Special programs include full-time self-contained programs for students with Autism, Emotional Disturbances, Intellectual Disabilities, and other programs. These programs are managed by both the special programs team and school principals.
***Special Education Coordinators are responsible for the implementation of IDEA at the local school level. Principals manage and evaluate Special Education Coordinators, but Special Education Specialists provide the coordinators with training and oversight.

The Office of Special Education also employed a quasi school-based/central office team that supported the district's local superintendents in managing principals in areas related to special education. Each of the district's twelve local superintendents was assigned to work with one cluster supervisor. The cluster supervisor was a seasoned special education and compliance officer who supported special education implementation at the school level and managed one or two special education specialists who were assigned to support special education implementation within a smaller group of schools. One cluster supervisor described her position:

> I am caught between the director [of special education] and my instructional
> superintendent. My instructional superintendent evaluates me but my position is
> paid for by the director. I have thirty years of special education experience in the
> classroom and as an administrator but often times both sides direct me to fix
> compliance problems rather than supporting teachers and principals. It's hard to be

> proactive with so many complaints and issues. I do my best and try to work with at least two or three teachers a week.

The director of special education had no oversight over principals. The district's local superintendents were the designated managers and evaluators of principals. The local superintendents reported to the Chief Academic Officer, who reported directly to the superintendent. Therefore, the director of special education had to work with both the Chief Academic Officer and local superintendents to implement any special education reforms in schools. Additionally, the director of special education was forced to compete with other offices and programs in the district because the Office of Special Education was not managed by the Chief Academic Officer. A considerable amount of bureaucracy made implementing special education reforms a challenge.

The reorganization of the office allowed a variety of teams to work on establishing a comprehensive data system. The data system was being developed to track a number of compliance related issues in the areas related to special education. Meanwhile, other offices within CCPS were developing data systems to track issues such as student behavior, standardized test scores, and attendance. Eventually, these data systems would work together to track and monitor schools. The Office of Special Education had an overwhelming focus on compliance and monitoring that was not only evident in the focus of projects but also in the staff dedicated to professional development. Throughout the course of the study, the office maintained approximately one person working half time on professional development for the entire school district, which is comprised of over 8,400 students with disabilities across more than 120 schools. At the same time, the district employed forty caseworkers, most without any education experience, directed to eliminate a backlog in compliance issues related to the class action lawsuits.

Phase 2: January 2009-December 2009

With a new organizational structure in the Office of Special Education and a system to track compliance, the superintendent and director of special education began to develop and roll out policies for school leaders. CCPS did not have an inclusion policy prior to the new superintendent's tenure. Early in 2009, the first inclusion statement was drafted and released publicly via the CCPS website and through principal training and special education coordinator training sessions:

> The concept of inclusion is to ensure that children with disabilities are educated alongside their non-disabled peers to the greatest extent possible… Segregation of a student with special needs should only occur rarely and only when the nature or severity of a student's disability is such that educating the student in the general education environment, with the use of supplementary aids and services, cannot be satisfactorily achieved. The law does not allow a student to be removed from the general education environment solely because the general curriculum needs to be modified for the student.

By August 2009, just before the start of the new school year, CCPS developed an initiative called the Neighborhood School Preference Policy (NSPP). NSPP was the first district-level policy implemented by CCPS to establish more inclusive schools. CCPS defined neighborhood schools as local schools where students in a particular area of the city would be assigned based on their address. Prior to the 2009-2010 school year, principals were able to deny students access to their school based on their own personal determination of whether their school could meet the needs of a student with a disability. NSPP required all schools to accept all students regardless of disability and attempt to implement their IEP for at least thirty days. Central office staff was assigned by the director of special education to oversee the implementation of the policy.

The superintendent made statements to the local media on the policy and promised parents at public forums that families now had the right to enroll at their neighborhood school. However, after thirty days, the school could reconvene an IEP team meeting and determine if the current school was the most appropriate placement for the student. Many principals were upset with the new mandate because they were not promised any additional resources or staff for students with disabilities who might be enrolling in their school. One principal noted the following:

> The [Neighborhood Schools Preference] policy is ridiculous. I get that the district is trying to save money and I get that kids should be in neighborhood schools but I don't get why we can't see some of that money the district will be saving when they move a kid from a non-public [school] to a neighborhood school.

Another principal argued that this policy was not aligned with the intent of IDEA:

> How can someone in central office tell an IEP team, with teachers who knows the child and their needs, where or how that child should be educated? We teach the child every day. They're our students, we know them. It's ridiculous.

In practice, the policy was often avoided by principals working together to move a student between their own schools without asking permission of the director of special education or the school's local superintendent. Some principals did not cooperate with the mandate and attempted to maneuver around the policy by persuading parents that their school was not an appropriate setting for their child. Principals and school staff were further enraged when they discovered that special education schools were being closed. In June 2009, one of the district's six special education schools was closed. The school served students with emotional disturbances in grades 1-8. The majority of the students were placed in their neighborhood schools with some or no additional supports to the school.

CCPS also used technology to monitor the inclusiveness of schools and compliance with IDEA. Prior to 2009, principals or schools in CCPS were not evaluated on special education data and outcomes in part because a data management system to track and manage special education data did not exist. From the summer of 2007 until August 2009, CCPS had been working to develop such a system. In August 2009, the school report card initiative, which would be part of the principal's performance evaluation each year, was rolled out by the district. The report card drew data from the special education data system and other data systems to present information on suspensions, attendance, state assessment performance by subgroup, special education compliance (timeliness for IEPs, assessments, eligibility determinations, and the implementation of Hearing Officer Decisions, Resolution Sessions, and Settlement Agreements) and inclusivity of the school (percentage of students with IEPs in the general education classroom for more than 61% of the school day). Principals were informed that they would need to use their school report cards to set goals for the year. The goals would be finalized in a one-on-one meeting between the superintendent and the principal that would take place each fall (between September 15th and November 1st). Principals were expected to meet their goals or face a possible termination from their position.

The special education measurements were displayed to principals in the form of a star rating. Schools could score between 0.25 stars to 4.0 stars in increments of 0.25. Table 2 below indicates how the star ratings were distributed by category. The inclusivity star was not a mandated policy but instead an incentive to increase the inclusiveness of the school. Schools were awarded from 0-1 star for inclusiveness. The star for inclusiveness was extra credit and was added to the Compliance Star Rating. The extra credit star rating could help a school struggling with compliance. For example, a school struggling to complete assessments on time with an overall star rating of 3.0 could increase their star rating by placing more students with disabilities in the general education classroom for a

larger portion of the day. The inclusivity star was measured by the district's Office of Data and Accountability. The office audited all IEPs in the district's electronic IEP system to calculate the school's inclusivity star rating. Schools could juke this statistic by drafting IEPs that documented specialized instruction and related services being implemented in the general education setting but not following the IEP in practice.

Table 2
Compliance Star Rating Distribution

Measurement	Star Weight
Timely Completion of IEP	1.0
Timely Completion of Eligibility Determination	1.0
Timely Ordering of Assessments	0.5
Timely Completion of Assessment	0.5
Timely Compliance of Hearing Officer Decision or Settlement Agreement	1.0
Total	4.0 Stars

The new data system gave district administrators the ability to track progress on a weekly basis, but the system had limitations that caused an extreme level of frustration for school staff. Principals found their schools losing points for issues they felt were out of their control. For example, a student with an outdated IEP that transferred in from another school within the district or from a charter school impacted the receiving school's star rating. Principals reported that they did not know or care about their compliance scores in special education, which was partially related to the inconsistencies and inaccuracies in the compliance scores. An elementary school principal shared her frustrations with the system: "To be honest, I don't even check the thing anymore. It's not accurate, nobody updates it so the way I figure, we do the best job we can here and we don't worry about what that thing says." Another principal noted that "I was getting in trouble with my supervisor for having low scores, I told him a lot of this isn't our fault. When I actually showed him why it wasn't our fault; that it was all these errors, he backed off. We both paid it very little attention after that."

Phase 3: 2010-2011

In January 2010, the Office of Special Education developed a central office-based, proactive placement review team called the LRE Review Team. In part, the team was developed because the NSSP was not working well. Students with disabilities were still being sent to non-public schools via local IEP teams. One district-level staff member described the problem:

> They [principals] know how to get kids out of their school. They know if they just up their [IEP] hours and change some things on the IEP they can say they can't serve the child in their school. Then that kid is out and if we don't meet that IEP, we get sued. It's ridiculous and has to change.

The LRE Review Team's objective was to increase the integration of students with disabilities in schools and to stop the outflow of students within neighborhood schools to more restrictive school settings. Any school that believed a student needed to move into a more segregated placement outside of their school had to submit a referral to the LRE Review Team. A central office staff member would be assigned to the case within thirty days, observe the student in the current school, interview teachers and staff, collect and analyzed student data, and make a recommendation for

placement. Principals reported that the LRE team often searched for an inconsistency, such as having an outdated Behavior Improvement Plan (BIP), to reject a change in placement. In many instances, the LRE Review Team member would attend the IEP meeting and serve as the LEA representative on the IEP team to ensure the IEP team did not override the LRE review team member's decision.

The LRE Review Team did not have any sanctions or accountability measurements. If a school did not follow the LRE Review Team's recommendation, a member from the LRE Review Team would have to communicate this failure to the director of special education. The director of special education or a designee would follow up with the building principal but typically not speak with the local superintendent. Principals could avoid using the LRE Review Team if they could bargain a deal with another principal to enroll the student they were trying to remove. Some principals directed staff to diligently document all issues to present a strong case for removal of the student.

The LRE Review Team did start to make progress in slowing the number of students being transitioned into non-public schools and other segregated settings. However, families and attorneys often had issues with the team and began to complain publicly. In 2010, CCPS released a policy statement on inclusion to schools and the general public. The statement conflicted with the 2008 inclusion policy statement:

> [CCPS] has no intention of arbitrarily placing students in environments that can't properly support them. We will not be moving students into classrooms that do not provide the necessary supports for their success. As the name suggests, special education is not a one size fits all approach; each student's plan will be individualized to his/her needs.

This statement appeared to ease tensions with families and their attorneys regarding inappropriately moving students into the general education setting. The statement was posted on the district's website and referenced in federal court supervision hearings. Schools and teachers now had to wrestle with two different descriptions of inclusion. One policy broadly promoted inclusion, whereas the other signaled caution regarding inclusion. A principal summarized their feelings on both district leadership and inclusion policy:

> I hear them [director of special education and superintendent] saying that we need to move toward inclusion but nobody is telling me how. I ask a few people for answers and get a few different responses back in return. I guess it's just up to me to figure out. That's what I do but that's not the best way to do things. What if I'm wrong?

Principals were then further challenged by more closings of special education schools. In June 2010, the district closed two more special education schools serving students with emotional disturbances. The majority of these students were returned to their neighborhood public schools, although some were sent to non-public placements. The local newspaper ran stories about the proposed school closures and how schools would be impacted. In late July and early August 2011, students from the closed schools began to enroll at neighborhood schools. The schools had no option but to enroll the students. If they felt they could not implement the student's IEP, the IEP team had to work with the LRE Review Team to change the student's placement.

Outcomes

The success and implications of the inclusion policies and reforms were difficult to measure, but some benchmarks existed to make a general determination of progress. Access to the general education classroom for students with disabilities did increase over the course of the superintendent's tenure. During school year 2008-2009, 14% of students with disabilities were

inside the general education classroom for 80% or more of the school day, whereas 28% of students with disabilities were inside the general education classroom for less than 40% of the day. By school year 2010-2011, 38% of students with disabilities were inside the general education classroom for more than 80% of the school day, whereas only 11% of students with disabilities were inside the general education classroom for less than 40% of the school day. A large number of students with emotional and behavioral were transitioned from non-public schools or special education schools to neighborhood schools where they had access to peers without disabilities. However, some principals developed segregated programs for these students that limited their access to the general education classroom.

Quantitative data related to standardized test scores indicated decreases and stagnation in academic outcomes for the subgroup of students with disabilities. The state's mathematics and reading assessments indicated significant decreases in test scores. In 2008-2009, 22% and 20% were proficient in the reading and mathematics assessments, respectively, but in 2011-2012, only 14% and 13% of students with disabilities were proficient in these respective examinations. Students with disabilities in secondary schools appeared to have similar decreases in their assessment scores. Scores from the National Assessment of Educational Progress (NAEP) indicated little to no growth for students with disabilities across the different grades.

Data from the superintendent's tenure did indicate a significant improvement in the district's compliance with IDEA. Findings from the court appointed researchers highlighted significant progress:

> CCPS [is] in a very different state than in 2006-2007… through the concerted efforts of leadership in CCPS, the [local education agency] and the many talented staff they recruited and assigned to key responsibilities, substantial progress has been made in remedying the overall structural challenges of identifying, tracking, and managing cases described in earlier reports of the Evaluation Team. Due process complaints being filed are served on the LEA to enable prompt efforts to investigate and attempt to resolve the complaint or prepare for a due process hearing. Data on HOD/SAs issued are now captured on a timely basis in the database for the purpose of tracking implementation and producing management reports for accountability. The accuracy and reliability of the information in these data systems has improved dramatically and is generally dependable relative to identifying the overall nature and progress of the case. The assignment of clear responsibility to central office compliance case managers for managing the implementation of HOD/SAs has created a more accountable system.

By 2012, the school district was able to successfully meet the terms of two consent decrees. In the only remaining lawsuit, a federal district judge highlighted significant progress in another class action lawsuit focused on providing appropriate services to students. In 2012, the district took new steps to develop special education programs and began to reduce the district staff positions focused on compliance. The district hired teams of specialists to develop, implement, and monitor special education programs across the district. The first two teams focused on supporting students with Autism and students with emotional and behavioral disabilities. These teams provided professional development for teachers and administrators and worked with the district and teachers' union to revise evaluations for special education teachers.

Conclusions

Motivated by the recognition that frequent challenges impeded special education reform, district administrators are employing a multiplicity of reforms to improve compliance with special education indicators, reevaluating placement types available to students with disabilities, and refining policies to influence the way placement decisions are made. Although the evidence regarding how districts reform special education programs and develop more inclusive programs is limited, research can steer district administrators and policy makers as they plan and implement reforms that enhance equity and improve outcomes for students with disabilities. Based on the literature reviewed in this article, this research identifies key issues of policy implementation that impact meaningful reform. This study of inclusion policy reform in CCPS suggests that the challenges of reform are more complex than current literature proposes. IDEA compliance related problems and budget shortfalls that may already exist challenge the future efforts of district-wide inclusion reforms. Accordingly, district administrators put forth numerous interventions, but in some instances, problems endured and at times, new problems emerged. In some ways, the policies and interventions were time sensitive and related to the current situation of the district. These findings have implications for district administrators and policy makers focused on developing policies to address issues of inclusion for students with disabilities.

District Actions

The literature review suggests the following possible actions for school districts: (a) use data to support schools and monitor schools progress; (b) incentivize inclusion programs for local schools; (c) provide professional development and support to teachers to support inclusion; and (d) champion inclusion initiatives across the district and community. The CCPS case reveals additional actions that have been overlooked in the literature but have important consequences for increasing the inclusiveness of school districts. For example, the research on district actions emphasizes the role district leaders take in advocating for inclusion and how policy incentives can be derived to promote inclusion but gives little attention to addressing structural inequities that may be present in school and district placement procedures.

In addressing structural inequities, the CCPS case demonstrates the importance of closing special educations schools, developing data systems to track special education issues, establishing systems of accountability related to special education for school leaders, and developing policies to oversee and monitor placement decisions. While the literature recognizes multiple types of policies or actions district administrators can employ to foster ambitious change, the literature does little to inform district administrators of the legal and budgetary dilemmas they may confront. In the case of CCPS, the district primarily focused on moving students from non-public schools and district-operated special education schools into neighborhood schools rather than working with schools to increase the staff's ability to educate all students or develop new or improved special education programs. They gave less attention to the legal implications of how placement decisions were made and how resources were distributed to schools. They gave virtually no support to schools or teachers and used a central office team to monitor and influence IEP team decisions on placement. In doing so, they ran the risk of simply replacing one system of segregation with another by moving from a separate non-public school or district-operated special education school to a full-time self-contained program located in the neighborhood school but isolated from the rest of the school.

District Challenges

A review of the literature suggests that challenges associated with inclusion can be related in part to the broad description of the least restrictive environment component of IDEA. The CCPS

case illustrates that the manner in which inclusion definitions and policies are designed can influence the way schools develop inclusion programs. In addition, the case revealed that districts struggling to meet IDEA requirements struggle with a multiplicity of challenges that compete for time, resources, and energy. This study revealed district efforts to place students in alternative placements back into neighborhood schools and efforts to keep students in neighborhood schools from being placed into alternative placements. These efforts precipitated problems in other areas. CCPS's Neighborhood School Placement Policy and the closing of district-operated special education schools forced neighborhood schools to take responsibility for educating more students with disabilities including some with more challenging needs. In doing so, some school leaders began to look for ways to cheat the system and limit students with disabilities from enrolling in their schools. The district underestimated the preparation required to ensure neighborhood schools were ready to receive students from alternative placements. In addition, the district failed to provide appropriate leadership to promote inclusion as a district-wide policy and to ensure that principals were onboard with the new policy. Clearly, some principals did not embrace inclusion or where unhappy with the lack of financial support and training provided by the district. CCPS may have failed to address such issues because they were stretched too thin given their decision to focus heavily on compliance issues related to their class action lawsuits.

These capacity demands, in turn, created other challenges for CCPS. For example, as schools began receiving more students with disabilities, they began to cheat the system and attempt to limit their enrollment. Consequently, the district developed the LRE Review Team to monitor IEP team decision making. The LRE Review Team created additional challenges for CCPS because parents and the legal community felt the district was forcing inclusion on families. In response, CCPS crafted a revised inclusion policy that responded to the community's concerns, but in doing so, sent mixed messages to schools and principals.

One additional challenge not described by the literature was related to the district's budget. Transportation costs, operating separate special education schools, and non-public tuition equated to a large portion of the district and city budget. Although no district administrator linked budget shortfalls to the district's inclusion program, and findings were limited in this area, it is highly plausible that the way inclusion reform was shaped in CCPS was linked to budgetary concerns. It is not surprising that district administrators would be unwilling to speak on how budget impacts the implementation of IDEA given the highly political context of urban education.

The Factor of Timing on Policy

The literature review did not highlight how the changing context of a district can influence the way district administrators make decisions or develop policies. For example, does a district with major compliance problems develop inclusion policies in the same way or with the same intensity as a district that is more compliant and under less legal scrutiny? The CCPS case suggests that challenges related to the district's context and condition may have played an important role in shaping the way the district developed policies. Given the historic lack of compliance by CCPS, the district appeared to have decided to focus resources on becoming more IDEA compliant. In doing so, CCPS was able to exit two long-standing class action lawsuits and save money in legal fees. In the later years of this study and moving into the present, the district began shifting staff positions from the compliance team to new special education programming teams. The shift in personnel highlights a shift in priorities based on progress associated with IDEA compliance. Another example of how time and context may have influenced leadership decisions and policies is related to budget shortfalls. This study took place over the course of a large economic recession, which heavily impacted CCPS. As a result, millions of dollars were cut from the district's budget and

specifically from special education and transportation costs. As noted, district administrators did not discuss this issue; however, it is not a far stretch to see that this time-related contextual factor could have shaped policy focus. Budget and special education have been raised as concerns in the past; the US Congress has heard testimony from numerous states claiming that IDEA was severely underfunded. In addition, the Congressional Budget Office has identified IDEA as an underfunded mandate. These revelations suggest that special education reform at the district level, particularly in high-poverty districts, can be influenced by the economic circumstances of a given period of time.

Recommendations

The findings from the CCPS case hold implications for district administrators designing and implementing district-wide inclusion initiatives and for researchers who seek to understand those processes. First, findings from this study suggest that the way districts define inclusion and where they focus their energy and attention are critical components of the district's ability to address many of the issues identified in the literature. The district's focus on moving students from non-public placements and district-operated special education schools to neighborhood schools created the opportunity for schools to provide a more inclusive learning experience if schools accepted these students and provided them with increased access to their non-disabled peers. The shift from non-public schools to neighborhood schools created opportunities for inclusion that were evident in the outcomes of the policy (e.g., a shift from 14% to 38% of students spending more than 80% of the school day in the general education classroom between 2008 and 2011). However, even with the shift from alterative placements to the neighborhood school, challenges persisted. This case suggests that district-wide inclusion programs cannot focus solely on eliminating alternative placements but must also increase neighborhood schools' ability to support more diverse student populations. Districts such as CCPS should concern themselves with issues related to school capacity, professional development, district-wide culture, and the pace at which they transition students from the most restrictive placements to less restrictive placements. If districts focus on these issues, they may avoid the pitfalls CCPS was confronted with as test scores dropped and school leaders looked to cheat the system.

A second implication relates to the pace of change and district capacity. CCPS's efforts were ambitious and required tremendous resources not only to transition students from non-public schools or close district special education schools but also to develop data systems, accountability systems, and legal compliance teams. With such enormous tasks at hand, CCPS spread itself extremely thin and did not have the capacity to support schools with instructional issues that research highlights as important to district-wide inclusion reform. Additional district-level capacity was needed to address all the issues they sought to fix. If CCPS was unable to expand capacity, they might have considered further prioritizing actions, such as finding a better balance between compliance work and instructional support at the school level or even focusing solely on compliance until they were prepared to support neighborhood schools with inclusion. If CCPS continues to fail to support neighborhood schools with instructional support, ultimately, a rise of additional challenges could compromise the reform and lead to more legal complications and a potential shift of students back into alternative placements. District administrators should be aware of such potential problems when determining the size and scope of reform.

A third implication concerns the legal problems that can arise when districts attempt to establish more inclusive schools. In this case, CCPS closed special education schools and identified students in non-public schools to be transitioned to their neighborhood schools. CCPS also used an LRE Review team to limit a school's IEP team from placing a student into an alternative placement.

From CCPS's position, a large portion of students were inappropriately placed in more restrictive settings (specifically alterative placements), but parents and attorneys did not always reach the same conclusions (as evidenced by the number of due process complaints). The legality of some reforms implemented by CCPS, particularly the LRE Review team, is somewhat inconclusive. Although CCPS followed IDEA guidelines and conducted individual IEP team meetings to change student placements, the widespread shift from alternative placements to neighborhood schools raised flags to attorneys and parents. One way to alleviate this concern is to provide better communication with parents and the legal community. For example, districts can offer open houses at neighborhood schools to share the benefits of a more inclusive schooling with parents.

Although this research presents important implications for district administrators and policy makers, the study has clear limitations that necessitate additional research. This study only looked at one reform, within one school district, over a four-year period. More research is required to further document the policies in other school districts because very little research is available at present. A continued study of CCPS as well as comparative case studies of similar districts implementing similar or different reforms could enlarge our understandings of how school districts are attempting to act in response to inclusion imperatives and the historic inequities in the field of special education. In-depth case study research could assist in identifying how inclusion models modify, for better or worse, the structures that determine placement decisions. Further research into district-wide placement policies can provide insights into how and why students with disabilities, particularly African-American students, are being disproportionately segregated from their peers. In addition, future research of this nature can supply insights into why special education programs are not meeting AYP goals and inform district administrators' efforts in crafting reforms that might promote more equitable and inclusive opportunities for all students.

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About the Authors

David DeMatthews
University of Texas at El Paso
Email: dedematthews@utep.edu

David DeMatthews is an Assistant Professor at the University of Texas at El Paso in the
Department of Educational Leadership and Foundations. David has worked in urban districts as a
high school teacher, middle school administrator, and district administrator. He studies issues
related to school leadership, urban education, special education, and social justice.

Hanne Mawhinney
University of Maryland, College Park
Email: hmawhinn@umd.edu

Hanne Mawhinney is an Associate Professor in the Policy and Leadership Division of the
Department of Teaching, Learning, Policy and Leadership. She studies the interaction between
leadership and policy change at federal, state, district and school levels.

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