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Building International Capacity for an Inclusive Special Education

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Abstract: The United Nations Convention on the Rights of Persons with Disabilities (CRPD) plays a pivotal role in guiding the capacity building, systems change, and shaping inclusionary school reform initiatives for students with disabilities. This paper explores the impact, perspectives, and implications of using the CRPD framework across three countries—Germany, Tanzania, and the United States—each representing distinct educational systems and frameworks. Varied approaches to responding to the CRPD, inclusionary school reforms, and special education are examined at the local level within these nations, highlighting the unique challenges and issues encountered. The paper investigates critical issues surrounding inclusive education reform, with a particular emphasis on the debate over full inclusion and its implications for special education practices. By reviewing disability and inclusion issues in these diverse settings, this paper underscores the complexities of implementing inclusive special education policies that effectively include students with disabilities while considering sociocultural and national contexts.

Keywords: Inclusion; Special education; Inclusive special education; CRPD; Education reform

1. Introduction

It has been proposed that there is a need to revitalize and strengthen special education (Kauffman, 2022) and to reimagine both special and inclusive education (Kauffman et al., 2023). Essential to this is building the capacity of special education to support students with disabilities in inclusive settings (Hornby, 2014, 2015). A key driver of these discussions internationally is the Convention on the Rights of Persons with Disabilities (United Nations, 2006).

This convention, adopted by the United Nations in 2006, strongly advocates for inclusive education and the full societal inclusion of persons with disabilities. The CRPD influences school reform for students with disabilities worldwide. Adopted on December 13, 2006, and entering into force on May 3, 2008, the CRPD represents a landmark effort to foster a fully inclusive, accessible, and non-discriminatory world for people with disabilities (United Nations, 2006). The influence of the CRPD on disability policy is evident in countries that have ratified the agreement, such as Germany and Tanzania. Moreover, its impact on inclusive reform discussions extends to countries that have not ratified it, such as the United States. The CRPD stated goal internationally is to promote, protect, and ensure the equality of human rights and fundamental freedoms for all persons with disabilities.

2. Purpose

The purposes of this article are to:

2.1. Review the practical considerations and perspectives of implementing inclusive and special education systems in Germany, Tanzania, and the United States. This includes examining how the CRPD influences educational reforms in these three countries, each with different economic backgrounds, educational histories, and disability policies.

2.2. Analyze the challenges and achievements of inclusive education reform in these countries, using selected examples, particularly in Tanzania. This section highlights difficulties in implementing inclusion, such as structural barriers, resource allocation, and teacher preparation, while also addressing how different national contexts impact the success of inclusive education.

2.3. Propose a balanced, evidence-based framework for Inclusive Special Education (ISE). This includes advocating for a "temperate" approach (Kauffman, Felder, Ahrbeck et al., 2018, p. 1) that incorporates research-based strategies encompassing both inclusionary and specialized educational practices to effectively support students with disabilities.

The CRPD has become a driver for special education and inclusive education reform internationally, impacting reform discussions on disability law and special education policy and practice. The CRPD is based on a human rights model of disability (Degener, 2018) and strongly advocates for inclusive education and full societal inclusion of persons with disabilities. However, each country who adopted the CRPD as a framework for disability education and incluson interprets the policy in different ways. Many approaches that interpret the incluson provisions of the CRPD are valid and reasonable. However, it could be argued that some interpretations should be rejected, especially those that focus on full inclusion. Full inclusion is often interpreted through a hardened anti-realist disability lens or attempts to promote an ideological view of incluson as meaning all students being in regular education settings with no exceptions or without regard to individual needs to promote inclusion equality.

3. Competing Disability and Inclusion Ideologies

There are competing ideological drivers of disability that are influencing the conception of disability and inclusion. The root of ideology comes from the Greek word "idea" (ἰδέα) meaning "form, pattern, or concept", combined with the suffix "-logy" (λογία), which means "the study of " or "discourse about" (Harper, n.d.). Ideology (Eagleton, 1991) as used here reflects the system of ideas, beliefs, values, and principles that shape an individual's or a group's worldview about disability, education, and inclusion.

For the CRPD, the primary ideological view driving it is the human rights model of disability, an extension of the social model of disability (Degener 2018). The social model focused on contesting the medical model by regarding disability as a social construct that is socially and linguistically constructed. Moreover, it has served politically as a means for disability advocacy for inclusion, accessibility and universal design, with the theme that society must be adapted to accommodate all people (Oliver, 1990). The human rights model of disability extends this view by reframing the social model as a human rights issue, so that the social construct of disability requires legal protections and non-discrimination protections.

Previous critiques of the social model are rooted in concerns about its anti-realist and deconstructionist views that seek to dismantle education systems to align with the assumed policy goals of the CRPD. Others point out the social model's limitations, arguing for

a more balanced approach that integrates both social and biological aspects of disability (Anastasiou & Kauffman, 2013). Some consider that full inclusion arguments are being used to the dismantle special education and supports for children with disabilities, leaving families and students in difficult positions (Anastasiou et al., 2020; Felder et al., 2024; Kauffman & Hornby, 2025). Others argue for the dismantlement of special education from an explicit ideological perspective. Brantlinger (1997) for example draws from critical and social justice ideologies, particularly those influenced by Marxist, critical theory, and deconstructionist perspectives to critique dominant special education discourses for reinforcing what are viewed as meritocratic and deficit-based ideologies. Her work and the views of many others aligns with critical disability studies, which rejects traditional disability notions as deficit based and instead view it as a socially and linguistic constructed category shaped by power structures.

Science and special education in this view is an oppressive and exclusionary force in disability discourse (Ware & Slee, 2019). Internationally, Slee has adopted similar viewpoints of disability and special education, also using a critical disability studies approach and deconstructionist ideologies to critique realist views of disability and dismantle special education (Graham & Slee, 2008). Slee and other writers characterize special education as a mechanism of systemic oppression exclusion, arguing that it reproduces exclusion and reinforces ableist structures under the guise of integration and support (Slee, 2011; Slee, 2018).

The issue of inclusionary reform in special and general education has long been debated in the United States, creating a fundamental divide in the field since the inception of the first special education laws. This debate intensified during the Reagan era with the introduction of the Regular Education Initiative, a policy effort aimed at deregulating special education and integrating it more closely with general education. Proponents of the Regular Education Initiative, such as Will (1986), argued that special education should fall under the broader umbrella of general education, promoting shared responsibility and equity by ensuring that all students could benefit from special education services.

Conversely, there is a strong anti-special education and anti-interventionist movement within the Neurodiversity movement, largely emerging from disability rights activist groups and promoted by writers about Disability Studies in Education. In this interpretation, full inclusion is promoted as a human right, requiring that barriers to participation be removed rather than having individuals make adaptations. While it is generally agreed that removing barriers for participation of students with disabilites is a good thing, there is a consensus that early intervention is of critical importance for health and wellbeing (e.g., National Research Council, 2001) which is a view at odds with the so called “Don’t Change Me” anti-intervention perspectives from the neuro-diversity movement (Walker & Raymaker, 2021). Generally, views are taken that reflect an anti-disability realist position to advocate for full inclusion, a perspective that, in its most extreme form, calls for the complete dismantling of traditional special education services (Connor, 2020; Sailor & Taylor, 2023).

There are several epistemological positions on the nature of disability that are influencing perspectives on special education and inclusion. Some scholars take an empirical and realist view of disability, asserting that disabilities are objectively real phenomena with measurable biological and cognitive characteristics that necessitate specialized educational approaches (Anastasiou, Burke, Wiley, & Kauffman, 2024; Burke & Felder, 2025). Conversely, other scholars adopt a sociocultural perspective on disability, arguing that disability is primarily a social construct rather than an inherent biological reality. From this standpoint, special education is often criticized as a segregated system that reinforces societal biases and perpetuates exclusion rather than dismantling discriminatory structures (Connor, Danforth, & Gallagher, 2024). Proponents of this view argue that special education settings create and sustain inequalities by separating students with disabilities from their non-disabled peers rather than addressing the broader systemic issues that contribute to educational disparities. In its most extreme form, this perspective views disability as a sociocultural myth, contending that diagnoses and classifications of disabilities are shaped by historical, political and economic factors rather than objective medical or psychological criteria.

Another emerging perspective from the United Kingdom that is beginning to influence discussions is critical realism in disability studies. This approach seeks to reconcile aspects of both the realist and social constructivist perspectives by arguing that disabilities are real but mediated by sociocultural factors (Shakespeare, 2013). The critical realism position acknowledges that biological and cognitive impairments exist independently of social interpretation, yet it also recognizes that the way society understands, accommodates, or marginalizes individuals with disabilities is deeply influenced by cultural, institutional and political contexts. This perspective attempts to bridge the gap between medical and social models of disability, advocating for an approach that is both scientifically grounded and socially responsive.

These varying ideological and epistemological positions continue to shape debates on inclusive education, disability rights, and special education policy, leading to significant tensions regarding the role of specialized instruction, the purpose of inclusive settings, and the broader implications of disability identity in educational and social systems.

4. Aims of Inclusion

The CRPD adopted by the United Nations in 2006, strongly advocates for inclusive education and full societal inclusion of persons with disabilities. The current divide in many countries is not on the "what?" but rather the "how?" and the divide between incluson and full incluson. Most acknowledge the importance of inclusion as a disability right and a socially important goal and also recognize the value of fostering social interaction, belonging, and friendships, as well as the academic benefits that might be built upon in inclusionary settings. Building the capacity of countries to support students with disabilities within regular education settings is essential. However, there remain long-standing divides on the particulars of disability and special education and inclusion regarding policy and practice, specifically, whether special services should incorporate an individualized focus, specialized instruction and supports, and a continuum of services and placements. Maintaining a continuum of services and placements is opposed by those who demand full inclusion of all students with disabilities in regular education settings, who often frame the issue as one of disability rights and exclusion (see Hornby & Kauffman, 2023). The other holds that students have different needs than those who do not have a disability, and thus, may need a different curriculum and type of instruction than generally provided in regular education settings. Moreover, there are some types of instruction and intervention that are needed to fulfill human right goals that can only occur in a separate setting. As Zigmond and Baker (1996) noted some time ago, "Inclusion is good; full inclusion may be too much of a good thing" (p. 33).

In the international debate regarding disability and special education reform, it is important to separate two key issues regarding school inclusion. In many countries, restructuring special and regular education to meet inclusive goals is essential in relation to disability rights. However, there must be recognition of the balance between the right to inclusion and the right to an effective and appropriate special and inclusive education (Hornby, 2015). Sometimes both competing rights are the same, but often they are different.

Certain perspectives driving inclusion reform and policy are arguably misguided and should be distinguished from a valid, evidence-based approach to inclusion and special education. These problematic views conflict with disability realism and should be critically examined worldwide. Notably, some advocate for dismantling special education to enforce full inclusion mandates (Connor, 2020; Slee, 2018; Taylor & Sailor, 2023). Such positions are considered rigid, untenable and unreasonable (Hornby & Kauffman, 2023; Kauffman & Hornby, 2025).

Additionally, some have used initiatives such as Positive Behavior Support and Tiered Systems of Support to erode special education, shifting interventions for students with disabilities under the jurisdiction of general education (Taylor & Sailor, 2023). These perspectives often adopt an anti-realist stance on disability, regarding it as a socially constructed myth (Slee, 2018). Furthermore, scholars within Disability Studies in Education critique scientific approaches as forms of oppression (Connor, 2020) or advocate for the complete dissolution of special education in favor of a full-inclusion tiered system (Taylor & Sailor, 2023). Such views reject a realistic and objective understanding of disability,

specialized instruction, and necessary supports (Hornby & Kauffman, 2023; Kauffman & Hornby, 2025).

Article 24 (Education) of the CRPD is interpreted by some key stakeholders as a mandate for full inclusion (CRPD Committee, 2016). For example, Theresia Degener, Chairperson of the CRPD, has promoted strong pro full incluson views and has advocated for the dismantling of special education in Germany under the umbrella of a human rights model of disability (Degener, 2018). However, the language of the CRPD (United Nations, 2006) does not explicitly define inclusive education, nor does it prohibit or endorse special education schools. It is reported that during the drafting process, there was considerable debate and differing opinions regarding the role of special schools and separate settings (Anastasiou et al., 2018).

The ideological focus of inclusive education has facilitated the emergence of a radical interpretation that calls for the dismantling of current systems designed to support students with disabilities. This position is most clearly articulated in Comment No. 4 of the CRPD Committee (CRPD Committee, 2016). While Comment No. 4 emphasizes the importance of reasonable accommodations and support services for children with disabilities—an essential aspect of inclusive education—it also asserts that inclusive education requires all children to be included in the same classroom, with any special setting being only temporary (CRPD Committee, 2016, p. 12).

The CRPD Committee provides authoritative guidance on the Convention on the Rights of Persons with Disabilities through general comments, which assist State Parties in fulfilling their obligations (CRPD Committee, 2024). However, these interpretations of the original CRPD text can vary, especially among stakeholders such as activists, policymakers, teachers, parents, and researchers. Anastasiou et al. (2018) noted that, during the drafting of Comment No. 4, countries such as Australia and Germany opposed a narrow interpretation of Article 24 and instead advocated for maintaining a flexible education system that includes specialized units and targeted support (p. 31).

Additionally, Article 5(4) of the CRPD states:

"Specific measures which are necessary to accelerate or achieve de facto equality of persons with disabilities shall not be considered discrimination under the terms of the present Convention" (United Nations, 2006).

One could argue that special education provisions and settings are justified under this clause, as they serve to promote de facto equality rather than exclusion. The Salamanca Declaration (1994) is often considered a milestone in the push for full inclusion. However, it also acknowledges the need for special units within regular education or special schools for a minority of students with significant needs (UNESCO, 1994, Section 9; Hornby & Kauffman, 2023). Thus, interpretations such as Comment No. 4, which emphasize full inclusion, remain subject to debate.

For inclusive education to be successful, some—but not all—students with special educational needs require intensive support systems. These may include small group instruction, pull-out programs, alternative classroom placements, and wraparound services, such as social work and therapeutic trauma-informed approaches. Such comprehensive services are often difficult to implement in regular schools but are typically available in special schools (Casale, 2024). One could argue that these specialized services align with the intentions of the CRPD (United Nations, 2006) and Comment No. 4 (CRPD Committee, 2016). However, in practice, significant tensions between general education classrooms and special education provisions persist in many countries (Murphy et al., 2022; Felder et al., 2024; Anastasiou et al., 2020).

Parents and teachers also play a crucial role in educational decision-making. Parents of children with special educational needs often value having options regarding their child's educational setting (Kauffman et al., 2023). However, for this choice to be meaningful, inclusive settings must be well-supported and research-based. The use of research-based practices is essential for children and youth with disabilities in school and community-based settings, as problem behavior often prevents school and community inclusion (Durand, 2021). Moreover, raising a child with behavioral difficulties can exact a psychological and emotional toll on parents that requires a balance of stressing the necessity of self-care, resilience, and an optimistic mindset and implementing pro-active evidentiary strategies as a core intervention framework to support families (Durand, 2011).

Outside of parents and caregivers, teachers are perhaps the most critical role in implementing inclusive education. However, they often hold

nuanced perspectives on the benefits and challenges of inclusion. Their views are shaped by practical experience and the realities of day-to-day classroom instruction (Felder et al., 2024). With careful and gradual planning, it is feasible to create an inclusive and special education infrastructure that incorporates a continuum of specialized supports to meet the diverse needs of students with disabilities. This continuum requires specialized supports ranging from full inclusion to the availability of specialized settings for students with severe special needs. Severe special needs can be understood as requiring a high level of ongoing assessment and intervention to address a student's complex learning needs.

However, if the goal is full inclusion with no exceptions—where all students are placed in the same classroom regardless of need—this approach is problematic. It is this rigid conceptualization of full inclusion that raises concerns. Many national education policies continue to pursue full inclusion, often at the expense of special education provisions. As a result, special education expertise and resources may be sacrificed, leaving students without the services they need (Anastasiou et al., 2020; Felder et al., 2024).

While disability inclusion is a critical and socially valid goal, disability and inclusion realist approaches are necessary for conceptualizing disability and impairment, guiding inclusive special education implementation, and shaping effective school reforms (Burke & Felder, 2025; Kauffman et al., 2023). Hornby and Kauffman (2023) highlight that no fully inclusive school system exists worldwide where all children are educated in regular classrooms regardless of disability or need. Empirical evidence supporting full inclusion as a universal policy is also lacking. Research indicates that many studies on inclusive education outcomes for students with disabilities are methodologically flawed and at risk of bias (Dalgaard et al., 2022). Different students require different levels of support—some can thrive in inclusive settings with proper support while others, even under ideal conditions with well-trained teachers and adequate resources, require more intensive supports that are available only in alternative settings (, 2017).

5. Three National Contexts for Special and Inclusive Education

The CRPD is shaping international educational reforms regarding disability and incluson, providing a foundation for reforming special education. Fuchs (2024) recently critiqued inclusive education internationally, examining India, Norway, Japan, Saudi Arabia, and South Korea. He indicated that while many countries have embraced inclusion as a policy goal, they struggle with inconsistent implementation. For instance, in India, inclusion became a "buzzword" after the Salamanca Statement, leading to policy adoption without clear strategies, while Norway's approach remains abstract and theoretical. Moreover, he noted that Japan's multi-track system, though operationalized, contradicts the goal of full inclusion. In addition, cultural factors play a role, as seen in Japan, where stigma discourages students from receiving needed support, and in Saudi Arabia, where historical segregation continues to influence current practices. Fuchs (2024) further identified that a major challenge across all nations is the lack of adequately trained teachers, with Saudi Arabia only recently developing special education training and Norway relying on unqualified teacher assistants. Moreover, he pointed out that the United States, despite having stronger teacher preparation systems, still faces concerns regarding general educators' ability to meet the diverse needs of students with disabilities, coupled with special education teacher shortages.

Like these countries, the nation's critiqued in this paper (Germany, Tanzania, and United States) differ in economic status, historical perspectives on education and disability, and governmental structures, including public welfare systems and special education frameworks. Among them, the United States and Germany rank among the world's wealthiest nations, with well-developed special education systems, whereas Tanzania is considered a developing country, where a significant portion of the population lives in poverty and infrastructure for supporting students with disabilities is still emerging (World Bank, 2024).

Despite these differences, all three countries are influenced by the UN-CRPD in ongoing discourses on special education and inclusion reform. This article examines inclusive education reforms in each country, highlighting both challenges and achievements. In the case of Tanzania, the discussion includes specific examples of student needs, particularly among deaf learners and individuals with albinism, to illustrate the

distinct challenges they face compared to students in the U.S. and Germany. In the conclusion, the authors provide a comparative analysis of their findings and discuss key issues associated with inclusive special education reform.

It is considered that, although the CRPD provides a policy framework for inclusion, it is unlikely that inclusive education can be universally prescribed across the diverse national contexts in which it is implemented. Each country must interpret inclusionary goals in a manner that aligns with its unique educational, cultural, and governmental structures.

6. CRPD Impact in Germany

The impact of the CRPD on German educational policies highlights both the advancements and challenges in striving toward more inclusive educational settings. It has significantly influenced policy discussions on school reform efforts in Germany (Ahrbeck, 2021; Ahrbeck et al., 2021). In October 2023, the CRPD Committee published its evaluation report on Germany's implementation of the Convention on the Rights of Persons with Disabilities (CRPD Committee, 2023, III). The committee viewed the passage of the German Federal Participation Act (Bundesteilhabegesetz, BTHG) of 2016 favorably, recognizing it as a significant advancement in promoting disability rights, enhancing self-determination for individuals with disabilities, and fostering their inclusion by aligning national policies with the CRPD's international standards. Furthermore, the committee emphasized that the Act supports the inclusion of individuals with disabilities in mainstream educational settings, strengthening their right to education alongside non-disabled peers. However, the committee also raised concerns about progress toward full inclusion under Article 24, which underscores the right to inclusive education. This provision ensures that persons with disabilities are not excluded from the general education system and receive the necessary support to facilitate their effective education (CRPD Committee, 2023, III.B, Art. 24).

6.1. Special and Inclusive Education in Germany

The current state of special education in Germany reveals ongoing tensions in inclusive school reform, particularly between maintaining special schools and advancing disability inclusivity within the general education system. This section describes and analyzes some of these tensions, particularly concerning interpretations of the CRPD. Special education in Germany is referred to as Sonderpädagogik, which roughly translates to "special pedagogy," "special education," or "special instruction." It encompasses the educational framework for teaching students with special needs. Special education teachers in Germany are highly trained professionals who must obtain a master's degree in special education, followed by a state-supervised internship at a school. Their training includes subject-matter knowledge equivalent to that of general education teachers, in addition to specialized instruction focused on specific disability categories (Ahrbeck et al., 2018; Felder et al., 2024).

6.2 Inclusive Policy Reform

While policy reforms to promote inclusive education are underway in many regions of Germany, large-scale implementation remains elusive. Germany is a sovereign nation-state within the European Union, comprising 16 federated states (Bundesländer), each with its own traditions, culture, history, constitution, and governmental structures. These states have autonomy in designing their educational systems within the overarching framework of the German constitution.

In practice, most students with disabilities in Germany attend disability-specific special schools. The CRPD Committee has expressed concerns regarding the slow progress in implementing inclusive education. Specifically, it cited, "the lack of full implementation of inclusive education throughout the education system, the prevalence of special schools and classes, and the various barriers encountered by children with disabilities and their families in enrolling in and completing studies at mainstream schools" (CRPD Committee, 2023, III, Art. 24, 53).

Currently, there are 530,000 students with special needs in Germany, accounting for 7.7% of all students. Forty-four percent of these students are educated in general education classrooms, though inclusion rates vary significantly across states, ranging from 31% to 90% (Autor:innengruppe Bildungsberichterstattung, 2022, p. 171). This disparity highlights the lack of a national consensus on the extent to which students with special needs should be included in regular classrooms. Although the number of students with special needs in inclusive settings has increased in recent years,

the number of special education schools has not significantly decreased.

The inclusion rate is typically measured by the proportion of students with special needs attending either special or general education schools. However, there is no data on the extent to which students in regular schools participate in general education classrooms versus being placed in separate settings. Additionally, each of Germany's sixteen states maintains special education schools serving students with various disabilities.

Moreover, there has been much discussion about the interpretation of the CRPD regarding the implementation of inclusionary reform (Ahrbeck et al., 2018). The CRPD Committee (2023) and the German Institute for Human Rights, which reports to the CRPD Committee in Germany, have criticized Germany's progress on inclusive education. When full inclusion is viewed as the ultimate goal, one must acknowledge that Germany is far from achieving it, particularly if full inclusion is defined as all students with special needs always being taught in regular education classrooms with appropriate supports (Kauffman et al., 2018). However, from another perspective, the CRPD Committee's assessment can be seen as evaluating inclusion against an unrealistic and unachievable benchmark that does not necessarily serve the best interests of all students with disabilities.

Significant work remains to be done in regular education schools and classrooms to build the capacity to support students with disabilities in inclusionary settings in Germany. Some full inclusion proponents critically view the influence of evidence-based practices and special education in regular education, particularly regarding the implementation of evidence-based methods (Schumann, 2024). Evidence-based approaches and special education are often characterized as deficit-oriented and grounded in a medical model of disability, which some critics argue represents an encroachment of special education into regular education.

Conversely, the CRPD Committee attributes the lack of progress toward fulfilling Article 24 of the CRPD to the continued existence of special schools. The committee rejects the notion that the development of an infrastructure to support students with disabilities can include special education schools or even special classes within regular schools. A key issue remains whether a particular school is adequately equipped to provide the programming and supports necessary for students with disabilities to receive a quality education (Ahrbeck et al., 2021; Casale, 2024). Additionally, there is a continuing need for special education teachers to be adequately prepared for inclusive settings. Similarly, many regular education teachers lack competence in inclusive education. Surveys frequently indicate that regular education teachers often feel uncertain about how to teach and include children with cognitive or multiple impairments (Deutsches Institut für Menschenrechte, 2023). Challenges include teamwork between special and regular education teachers, clearly defining the roles and responsibilities of both groups in inclusive settings, ensuring the availability of special education support in general education, and securing appropriate equipment and space (Felder et al., 2024).

In Germany, support systems for students with special needs within regular education require urgent reform. The challenges of inclusion have been notably highlighted by the AiBe Study (Ahrbeck et al., 2021), which was commissioned by the Senate Office of the State of Berlin to investigate, "Initial experiences with the development of inclusive schools in Berlin." This longitudinal study, conducted from 2011 to 2017, surveyed nearly 1,300 students from 23 primary school classes (grades 1–6) and five secondary school classes (grades 7–10) in Berlin. The study collected quantitative data on cognitive performance development and school-related attitudes and experiences. Additionally, over 2,000 guideline-based interviews were conducted with students, teachers, school administrators, and parents as part of a qualitative research component to monitor the reform process.

Findings from the AiBe Study indicated significant challenges in resource allocation for students with special needs. Teaching students with social-emotional and behavioral difficulties was particularly problematic. Temporary placement in special settings was often seen as a crucial—if not prerequisite—measure to prevent the failure of inclusive schooling. Furthermore, in terms of cognitive development, students with special needs did not achieve expected progress in inclusive schooling compared to those in specialized settings (i.e., special schools). Many schools lacked

a clear conceptual framework, and children with more severe disabilities often struggled to form social connections despite significant efforts from teachers and parents. The study also underscored the necessity of intensive, personalized assessments to develop and target educational goals, particularly in the areas of learning, language, and emotional-social development. The importance of such assessments was evident at the study's outset, and this need has only grown with increased experience in inclusive school reform (Ahrbeck, 2021; Ahrbeck et al., 2021).

6.3 Institutional Systems' Change

It is considered that systemic changes are needed within German educational and social policy to better integrate children with disabilities into mainstream educational settings. However, institutional reforms should emphasize structural coherence that aligns with the existing German educational system. The Federal Participation Act (*Bundesteilhabegesetz*, BTHG) is considered a landmark in German social policy, enacted to improve the educational experiences of children with special needs in regular schools. A significant advancement of the BTHG was the extension of the right to self-determination and choice for individuals entitled to benefits, along with the decoupling of participation benefits from the welfare system of social assistance (Holtkamp & Stubican, 2021, p. 27).

Despite these advances, the Act has not resolved the issue of "pillarization" within the administrative structures that govern the education and participation of children with disabilities. Specifically, while the educational ministries of the federal states or local school departments oversee institutional aspects of schooling—such as curricula, staffing, and funding—measures to integrate children with disabilities into mainstream schools are managed by local or regional authorities under the jurisdiction of social ministries. This division complicates the process for parents, who cannot assume that their children will be admitted to their preferred mainstream schools or that the necessary accommodations for their education will be provided based on individual needs. This structural division runs throughout German social policy and frequently complicates the participation of children with disabilities in educational institutions. Unlike their peers, parents of children with disabilities must navigate additional bureaucratic processes to secure necessary accommodations through integration assistance providers (Brettschneider & Klammer, 2020, p. 48). The "Great Solution" proposed in Book Eight of the Social Code aims to address these challenges by incorporating the interests of children with disabilities and providing procedural guidance to assist parents in navigating the system.

6.4 Specialized Teacher Preparation in Germany

Specialized training in inclusive special education is essential for both special and general educators to equip them with the necessary skills and knowledge for effective teaching in inclusive and special education settings. As Germany progresses toward its inclusionary objectives, the preparation of general and special education teachers emerges as a critical area requiring enhanced focus and discussion to facilitate systemic changes in both inclusion and special education.

Specialized teacher preparation in inclusive special education should focus on implementing supportive measures to overcome institutional and educational barriers to inclusion. These efforts should aim to facilitate the inclusion of students with disabilities in regular educational settings from an evidence-based perspective (Hornby, 2014). Achieving realistic inclusion in regular education schools for students with disabilities will require special and general education teachers with specialized pedagogical and didactic skills. Teacher preparation programs devote significant time to understanding different types of disabilities, compensation strategies, and legal rights, all of which are crucial for supporting the successful inclusion of students with disabilities in general education. However, teacher preparation programs at most German universities, including special education programs, often emphasize subject-matter expertise over pedagogical competencies. While both are essential, a disparity remains (Rackles, 2024). The federal government is currently seeking to address this issue through a, "quality offensive for teacher training" (Gräf, 2022). Germany claims to have a comprehensive system of vocational preparation and support for students who do not directly transition into vocational training or higher education. This system ensures that students who may not find opportunities in the primary labor market still have viable career paths, facilitated through collaborations between special schools and various vocational entities (Werner, 2023).

Despite criticism, there are many laudable aspects of the German educational system that arguably should be retained. Supporting students with disabilities is a complex issue, and often, there is no "one-size-fits-all" solution (Ahrbeck et al., 2018). Some voices have called for the dismantling of special education in Germany (see Ahrbeck & Felder, 2020). However, rather than dismantling, a more objective, reasoned, and incremental systems-change approach is recommended. A combined inclusion and special education systems-change approach should be adopted to build institutional capacity and foster inclusive special education. This approach would leverage the strengths of the existing German educational system, enhance the quality of alternative settings where necessary, and involve both general and special education teacher preparation to support students with disabilities in inclusive and specialized educational settings.

7. Inclusive School Reform in Tanzania

There are infrastructural and societal barriers in Tanzania that hinder the development of inclusive special education and building the capacity for inclusion. Tanzania is a developing country building the capacity for implementing inclusive and special education. Special education in Tanzania dates back to the 1950s, when it was introduced by the Church Missionary Society (Possi & Millinga, 2017; Pembe, 2008). Over the decades, Tanzania's special education system has evolved, with the government establishing various specialized schools and units to serve students with disabilities, including those with hearing, visual, physical, intellectual, deaf-blind, and autism spectrum disabilities (Pembe, 2008). Currently, students with special needs are educated in inclusive general education classrooms, special and residential day schools, and special units integrated within regular schools (The Citizen, 2021).

As a member of the international community, Tanzania has committed to various international declarations promoting accessible and inclusive special education for all children. These include the Convention on the Rights of the Child (United Nations, 1989), the CRPD (United Nations, 2006), and the Education for All (EFA) policy document (UNESCO, 1990). In response to these commitments, Tanzania officially launched the first phase of its National Strategy on Inclusive Education in 2009 (Ministry of Education and Vocational Training [MoEVT], 2009), shifting its educational approach to inclusive education beginning in 2010. However, despite these efforts, significant challenges remain in ensuring the right to education for children with disabilities. The lack of educational opportunities for most young people with disabilities persists (Mkama, 2024).

There are emerging efforts to create inclusive educational environments and enhance special education programs in Tanzania. These initiatives aim to integrate students with disabilities into the education system while ensuring that special education services remain available to support all students with disabilities. Additionally, sociocultural challenges must be addressed by promoting awareness and acceptance of individuals with disabilities within the broader school community (Michael, 2023). Such efforts are crucial in fostering an inclusive society and providing quality educational opportunities to every child with a disability.

Most special education services in Tanzania are provided at the primary school level through residential (boarding) and non-residential special schools, both government-run and those supported by humanitarian organizations and churches (Possi & Millinga, 2017). Special units within regular schools also exist. Despite these provisions, inclusive education, which aims to integrate all children into the same classroom environment, has not resulted in the expected educational outcomes. Factors such as large class sizes, low school enrollment rates, and a high dropout rate among children with disabilities (50%), combined with a high prevalence of disabilities and challenging geographical conditions, have led to significant educational underachievement among young people with disabilities. Additionally, stigmatization and discrimination against students with disabilities further hinder school attendance (Mkama, 2024).

A significant number of children with disabilities continue to be excluded from the educational system due to multiple factors, including:

- Limited availability of special schools and units
- Long distances from home to special schools and units
- Poor transportation infrastructure, particularly in rural areas

• Lack of trained teachers (both general and special education)

• Insufficient specialized equipment and teaching/learning materials suitable for children with disabilities

• Unreliable statistics on the number of children with disabilities

• Negative societal attitudes toward disability

• Lack of funds for community sensitization and teacher training

• Poor supply of teaching/learning materials and specialized equipment

• Inaccessible physical school environments

• Lack of awareness among government officials responsible for education at various levels

• Unclear policy statements

(Mkama, 2024; Michael, 2023; Tungaraza, 2012).

8. Disability Need Examples

8.1 Deaf learners

Deaf learners in Tanzania necessitate specialized support and inclusive practices to ensure their right to an inclusive special education. The specific educational needs and challenges of deaf students in Tanzania highlight the inadequacy of special and inclusionary support services. Since 2010, special and inclusive education for Deaf learners in Tanzania has been formally recognized through the establishment of specialized units, special schools, and integrated or inclusive classes (Mkama, 2021; Mapunda et al., 2017). Despite various initiatives to provide special and inclusive education to all learners, regardless of their backgrounds, significant challenges persist. These include how deaf learners receive services and support in inclusive settings and their transition into community life. One major challenge is language and communication barriers, exacerbated by the lack of adequate sign language interpreters (Tanure et al., 2024; Xie et al., 2014). Additional structural issues include a shortage of specialist teachers, poor classroom conditions, and overcrowded classrooms, all of which hinder the educational progression of many deaf learners to higher levels (Dela Fuente, 2021; Mapunda et al., 2017; Mkama & Storbeck, 2023; Kimaro & Kileo, 2023; Rishaelly, 2017).

Research has consistently shown inadequate preparation for the transition of deaf learners from school to community life (Bonds, 2019; Curle et al., 2016; Hlatywayo & Ncube, 2014). In Tanzania, limited employment opportunities for deaf individuals often stem from a lack of access to higher education, an insufficient transition system from school to community life, and restricted access to information on career pathways (Mkama, 2021). Consequently, many deaf learners who do not pursue further studies become dependent on their families for support. This dependency is particularly concerning, as nearly 26 million people in Tanzania lived in extreme poverty in 2022 (Cowling, 2024) out of a population nearing 70 million (Worldometer, 2024). Some deaf learners find employment only in low-paying and challenging work environments (Charles & Mkulu, 2020). Deaf and deaf-blind students require additional specialized support, including access to life coaching and career advisors specializing in deaf education, to help determine appropriate career paths and facilitate a smoother transition into the workforce (Kyzar et al., 2020; Kyzar et al., 2016; Zatta & McGinnity, 2016; Wilson-Clark & Saha, 2019).

8.2 Students with Albinism in Tanzania

Persons with albinism (PWAs) in Tanzania face widespread discrimination and stigmatization. A dangerous myth propagated by some witch doctors suggests that the body parts of PWAs possess magical properties, leading to the mutilation or murder of individuals with albinism, including children. In response, the government has placed some children in shelters, special schools, or boarding schools to ensure their safety. However, this approach is controversial, as it may compromise children's rights to family and community life and limit their educational opportunities (ENACT, 2022). This presents a dilemma: unless students' safety can be guaranteed within their home communities, they must be educated in protected settings where their security is assured.

Students with albinism in Tanzania also face unique challenges that necessitate specialized support and inclusive practices. Albinism is an inherited condition characterized by a lack of melanin production, affecting vision and often skin pigmentation. Children with albinism may experience various vision problems, such as astigmatism, photophobia, nystagmus, low vision, and refractive errors. Additionally, they are at an increased risk of sunburn and skin cancer due to reduced melanin in the skin (National Health Service

[NHS], 2023). Tanzania has a significantly higher prevalence of albinism than other African countries, with approximately 1 in every 1,400 Tanzanians affected, compared to 1 in 15,000 across the continent. This makes Tanzania the country with the highest incidence of albinism worldwide (ENACT, 2022).

In educational settings, children with albinism require specific accommodations, such as assistive technology, large-print materials, extended time for tasks, and flexible seating arrangements. However, despite these needs, many students are placed in overcrowded classrooms, often with only one teacher responsible for as many as 80 students, making personalized learning and adequate support difficult. Additionally, many teachers lack training in special education or in addressing visual impairments, leading to poor academic performance and the misplacement of students with albinism into special schools, despite their potential to succeed in general education classrooms with appropriate support (Ndomondo, 2015). Even when eye-care services are provided, they are often inadequate, as corrective glasses do not fully resolve the vision challenges experienced by these students (Franklin et al., 2018).

Moreover, many children with albinism also do not receive adequate healthcare, including skin care and vision care. A significant number never undergo an eye exam, which is essential for determining the best learning accommodations. Currently, there is limited research on the overall educational outcomes of students with albinism in Tanzanian schools and the specific special and inclusionary support they receive. Further research is necessary to address the educational, health, and quality-of-life outcomes for this vulnerable population (Ndomondo, 2015).

9. Inclusive School Reform in the United States

The landscape of inclusive school reform and special education is reviewed in the United States along with policies and practices that shape the educational experiences of students with disabilities. Schools in the United States are legally required to provide students with disabilities who have educational needs related to their disability in the United States a special education. There is a growing body of evidence supporting inclusion and special education practices that facilitate the integration of students with disabilities into inclusive settings. However, the evidence base for inclusionary practices is distinct from the evidence required to justify a full inclusion mandate. A substantive number of students with disabilities will spend much of their time in regular education settings even while spending some amount of time in settings dedicated to specialized instruction. Moreover, concerns persist regarding the lack of empirical support for full inclusion as a universal requirement (Kauffman et al., 2018), particularly given that IDEA serves students across thirteen different disability categories, each with its own conceptual framework, history, challenges, and educational needs.

9.1 Individuals with Disabilities Education Act (IDEA)

The primary purpose of special education is to provide specially designed instruction to students with disabilities. The legal framework governing special education was originally passed by the United States Congress and signed into law by President Gerald Ford in 1975 as the Education for All Handicapped Children Act (EHA), also known as Public Law 94-142, later renamed The Individuals with Disabilities Education Act (IDEA). This landmark legislation ensured that all children with disabilities are provided a free appropriate public education (FAPE) in the least restrictive environment (LRE). The goal of this legislation was intended to, “ensure that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living” (U.S. Department of Education, 2004, Section 300.1).

More specifically, special education is legally defined in the United States at the federal level as, “Special education means specially designed instruction, at no cost to parents, to meet the unique needs of a child with a disability, including: (A) instruction conducted in the classroom, in the home, in hospitals and institutions, and in other settings; and (B) instruction in physical education” (U.S. Department of Education, 2004, Section 602[29]). Moreover, there are many policies reflected in IDEA that promote integration and inclusion within the context of special education in the United States. However, IDEA does not mandate

full inclusion (Yell & Prince, 2022). Rather, special education is pragmatically focused on the principles of appropriateness, individualization, specialized instruction, LRE, and high expectations associated with, "access to the general education curriculum in the regular classroom, to the maximum extent possible" (U.S. Department of Education, 2004, Section 682[c][5][A]).

Moreover, it is important to note that there is a substantive conflict between the U.S. conception of special education and the framework endorsed by the CRPD. The U.S. model of special education is based on affirmative intervention tailored to a student's specific disability. This model recognizes that, due to differences, some students require different treatment and specialized support. In this regard, special education is an intervention-based policy and should be distinguished from the Americans with Disabilities Act (ADA), which is a discrimination-based law and more closely aligned with some interpretations of the CRPD, particularly regarding inclusion.

9.2 Regular Education Initiative

Inclusion, and particularly full inclusion, has been an ongoing topic of discussion in the United States since the introduction of the Reagan-era Regular Education Initiative (Will, 1986). REI represented the first major policy effort to merge special education under the umbrella of general education to promote full inclusion. Madeline Will, who served as the Assistant Secretary of the Office of Special Education and Rehabilitative Services (OSERS) in the U.S. Department of Education during the Reagan administration in the 1980s, emphasized the importance of collaboration between regular and special education to support students with learning challenges. The Regular Education Initiative advocated for an integrated system that adapts to the needs of the child, rather than requiring the child to fit into a predetermined program. Will (1986) stated, "We need to visualize a system that will bring the [special education] program to the child rather than one that brings the child to the program" (p.413).

Some of the policy and systems change critiques from the Regular Education Initiative are meritorious and are now incorporated into tiered systems of support, particularly in the promotion of implementing evidence-based practices in inclusionary settings. However, substantive concerns emerged regarding the moving of special education expertise to become under the auspices of general education. Will (1986) also critiqued long-standing concerns about separate programs, stating that they promote the, "stigmatization of students who have been placed in special programs which segregate them from their peers and from regular school activities" (p. 412). However, many in the field expressed significant concerns about the elimination of specialized settings (e.g., resource rooms). A key concern was the potential loss of a distinct special education identity with defined functions. This issue was particularly relevant in discussions about the integration of special education into general education to promote inclusion, especially given the lack of empirical evidence supporting an inclusion mandate (Zigmond et al., 2009).

IDEA does not contain the term inclusion and thus, it is largely a value laden term open to interpretation. The variability resulting from the LRE is often critiqued negatively by those focused on inclusive school reform. However, variability is to be expected especially when risk factors for disability is taken into consideration (Kauffman, Burke, & Anastasiou, 2022). Instead, the focus is on the least restrictive environment and making individualized decisions that should result in an appropriate special education that responds to the unique needs of the learner with disabilities.

The EHA has been updated and reauthorized several times. In 1990, it was renamed IDEA. The 1990 reauthorization also added autism and traumatic brain injury (TBI) as distinct disability categories, acknowledging the specific educational needs associated with these conditions. Previously, autism was often included under the category of "Other Health Impairments" (OHI) and/or "Emotional Disturbance" (ED), while traumatic brain injury was generally served under "Orthopedic Impairments" and/or OHI. Additionally, the 1990 amendments emphasized transition services to assist students with disabilities in moving from school to post-school activities, including employment and post-secondary education. These changes also strengthened the focus on ensuring that students with disabilities have access to the general education curriculum. Language was included to clarify the importance of appropriate placement, ensuring students were educated in settings that would best meet their needs.

9.3 IDEA Amendments

The IDEA has undergone several amendments in the provision of special education. The 1997 amendments to IDEA brought significant enhancements to the law, promoting inclusive practices. These changes required students with disabilities be included in state and district-wide assessments to ensure their educational progress was monitored alongside their peers. General education teachers were required to be part of the IEP team. The amendments also introduced stronger disciplinary provisions to ensure that students with disabilities continue to receive FAPE even when facing suspension or expulsion. Additionally, the 1997 reauthorization encouraged the use of positive behavioral interventions and supports (PBIS) to address behavioral challenges. Further emphasis was placed on ensuring that students with disabilities were provided access to the general education curriculum and were placed in the least restrictive environment (LRE) that met their educational needs.

The 2004 reauthorization, known as the Individuals with Disabilities Education Improvement Act, was aligned with the No Child Left Behind Act, a Bush era initiative to promote scientifically based practices, especially in reading, and ensure that students with disabilities were included in accountability systems. This reauthorization required that special education teachers be highly qualified, emphasizing the need for skilled educators. It also introduced the term "response to intervention" to identify students more effectively with learning disabilities. Enhanced early intervention services were also included to support students who had not yet been identified as needing special education but required additional academic and behavioral assistance. This reauthorization continued to emphasize the importance of access to the general education curriculum, and of providing services in the least restrictive environment while still providing a continuum of alternative placements.

9.4 State of Inclusion in the US

The 45th Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act (IDEA) provides a detailed analysis of the educational environments for students ages 5 through 21 served under IDEA, Part B, by disability category. It should be noted that this represents bodily inclusion- or inclusion of the body in a regular education setting and not necessarily associated with academic or social outcomes, whose connection to inclusion continues to be contested.

Table 1. Percent of time spent in regular education settings by disability area.

Disability Category	80% or more of the day	40% through 79% of the day	Less than 40% of the day	Other environments
Speech or language impairment	88.3%	3.7%	3.7%	4.3%
Specific learning disability	75.3%	19.1%	3.8%	1.9%
Other health impairment	70.2%	18.1%	7.7%	4.0%
Developmental delay	69.8%	14.6%	13.8%	1.7%
Visual impairment	69.7%	11.3%	8.7%	10.2%
Hearing impairment	64.5%	13.3%	10.2%	12.0%
Orthopedic impairment	57.6%	14.5%	20.1%	7.8%
Emotional disturbance	54.7%	17.0%	14.6%	13.7%
Traumatic brain injury	51.5%	20.8%	19.6%	8.2%
Autism	40.8%	17.1%	34.2%	7.8%
Deaf-blindness	30.1%	11.0%	32.2%	26.7%
Intellectual disability	18.7%	27.7%	47.2%	6.4%
Multiple disabilities	15.3%	17.9%	43.5%	23.2%
All disabilities	66.6%	16.0%	12.6%	4.8%

As illustrated in **Table 1**, inclusion rates vary significantly by disability type for bodily inclusion. For instance, 75.3% of students with specific learning disabilities were in regular classrooms for 80% or more of the day, compared to only 18.7% of students with intellectual disabilities. Students with speech

or language impairments had the highest inclusion rate, with 88.3% spending 80% or more of their day in regular classrooms. Conversely, students with intellectual disabilities, multiple disabilities, and deaf-blindness had lower inclusion rates, with substantial percentages spending time in separate environments.

9.5 Who, What, How, and Where?

Despite research advances in the field, the "Who, What, How, and Where" of special education continues to be contested and debated in the United States (e.g., Zigmond, et al., 2009). Kauffman (2022) indicated that special education should be revitalized; however, old questions must be revisited for such a renewal to occur broadly to determine where countries should invest time and resources. These include: Who should be considered for services? There are sharply contested and differing views on the nature of the disability construct within each of the 13 areas of disability. Moreover, what are the relevant goals, and should they be defined by the general curriculum or individualized? Likewise, how should instruction be provided? There are numerous approaches to teaching students with disabilities, some likely more effective than others. Finally, where should these practices occur? The issue of bodily inclusion has been a controversial topic, causing division in the field. Bodily inclusion is often the primary metric of concern. Yet academic and social-behavioral benefits should also be considered, as they may vary according to the type and nature of disabilities and impairments.

A broad consensus has emerged that inclusion reform is needed and is a socially valid goal. However, there are many diverging views on the "Who, What, When, and Where" in the United States. Some are promoting an anti-realist disability position, arguing for the dismantlement of special education and a full inclusion mandate. Others argue there is merit to inclusion, but the fundamentals of the current disability framework are conceptually valid. In contrast, this view adopts a disability realist perspective. Disabilites are real but multi-faceted and to dismantle special education infrastructures for supporting students with disabilities is irrational. Instead the field of special education should focus on revitalizing special education (Kauffman, 2022) and take the best from inclusion and special education (Hornby, 2015). The field especially diverges on the role of special education to support students with disabilites in regular education settings, with some promoting its dismantlement and replacement (Taylor & Sailor, 2023).

10. International Inclusion Reform Dilemmas

There are substantive dilemmas and challenges to meet the inclusionary goals of the CRPD. Three views on inclusionary reform were provided from three countries, each with a different emphasis and focus. The CRPD and associated inclusionary reforms are significantly impacting special education and inclusion reform in these countries. The three examples demonstrate that significant tensions and dilemmas persist between regular and special education. A common challenge is the inclusion of all students in regular education classrooms.

In Tanzania, participation in education remains a significant problem for children with special educational needs. A continuum of placements is available, but access to such placements remains difficult. In Germany and the United States, most, if not all, students participate in education. In Germany, inclusive reform is particularly challenging against the backdrop of a highly developed special education system, where most students with special needs are still educated in special schools, despite increasing numbers of students with special needs in regular education classrooms. Path dependency (Pierson, 2000) is reflected in the inertia of social and political systems. Well-developed, established structures, such as those in Germany, are difficult to change. On one hand, this ensures the stability of these systems, but on the other hand, it also creates a certain resistance to reform (Beyer, 2015).

Even in the United States, which perhaps has the longest tradition of inclusive school reform, dilemmas continue to exist—such as the fact that many children with cognitive disabilities spend much of their day outside the regular education classroom, even though they attend regular education schools. Although all three countries have laws in place to implement inclusion, the United States likely has the most advanced and legally binding laws governing special education. Here, tensions are evident in the ongoing debates about a continuum of placements (least restrictive environment) and full inclusion, which have persisted for decades. The question remains:

How can inclusionary reform progress effectively while maintaining a commitment to individualized and specialized instruction that will best meet the needs of those who have disabilities?

11. The Golden Mean in Special and Inclusive Education

In response, some are calling for a more measured and balanced approach to meeting the CRPD provisions on inclusion (e.g., Kauffman, Felder, Ahrbeck, Badar, & Schneiders, 2018). The "Golden Mean" is a concept that originates from ancient Greek philosophy (Aristotle, 2004). It refers to the desirable middle ground between two extremes, one of excess and the other of deficiency. Aristotle used this concept as a moral guideline, proposing that virtue is a balance between two vices — one involving excess and the other scarcity. For example, courage is considered a virtue that lies between the extremes of recklessness (excess) and cowardice (deficiency). The idea is that by finding the Golden Mean, one can achieve a balanced and ethical life, avoiding the pitfalls of going too far in any one direction. Moreover, The Golden Mean is not fixed but varies from person to person, recognizing the individual differences in people's circumstances and capabilities. Therefore, what constitutes a mean for one individual might be an excess or deficiency for another. Integrating the concept of the Golden Mean with the debate on disability and special education reform, we can see a need for a balanced approach that avoids extremes.

In many countries, restructuring both special and regular education to meet inclusive goals is seen as essential in relation to upholding disability rights. However, Aristotle's concept of the Golden Mean suggests that virtue and practical wisdom lie in finding a strategic balance. As indicated by Hornby (2015), "There is a balance between a right to inclusion and a right to an effective and appropriate special and inclusive education" (p. 28). Some students may need significant 1to1 specialized instruction in a quiet environment to learn; other children may need long-term intensive behavior assessment and intervention which may not reliably be applied in a regular education classroom. Other students may have intensive health und sensory needs which make it impossible for the child to spend most of the day in a general education classroom. Instructional methods and materials used may be very different from those used with children without such special educational needs.

By applying the principle of the Golden Mean, we can argue for a moderate path that incorporates the strengths of both inclusionary and specialized educational systems. This balanced approach would recognize the value of inclusion in fostering social integration and equality, while also maintaining specialized resources and settings for those whose needs are best met in more tailored environments. Such a balanced approach is not only practical but also essential to ensuring that all students receive an inclusive and special education that truly accommodates their individual circumstances and maximizes their potential, thereby embodying the virtues of equality, equity, and justice in school inclusion reform. 'Inclusion realism' (Burke & Felder, 2025) is needed in integrating the best aspects of both special and inclusive education to meet the diverse needs of students with disabilities without compromising on quality and effectiveness. Such an approach acknowledges the commendable objectives of inclusion while also remaining pragmatic, objective, and evidence-based in its implementation. To facilitate the necessary capacity building for inclusive special education, it is recommended to adopt this framework when conceptualizing educational reforms.

12. Human Rights and Science

As illustrated in the Human Rights Model of Disability, much of the discussion regarding inclusion is a normative one. Disability rights are important in determining many of the goals of inclusion. The CRPD does not include a mention of the need for research or science-based approaches for addressing disability needs. However, it is difficult to imagine meeting disability and inclusion human rights goals without considering empirical evidence in determining how best to support students with disabilities in inclusionary settings, or how to provide them with appropriate specialized instruction. To achieve many of the laudatory human rights goals, multiple perspectives will need to be employed, including scientific perspectives. In the U.S. scientific perspectives have long been used to understand disability, child development, and mental health. Notably, the establishment of the Eunice Kennedy Shriver National Institute of Child

Health and Human Development established in 1962, is a part of the U.S. National Institutes of Health (NIH, https://www.nichd.nih.gov/about/history). Additionally, the establishment of the Institute for Education Sciences (IES, https://ies.ed.gov/#) and the Division for Research for the Council for Exceptional Children (https://cecdr.org/) articulated the original research standards in special education. All have made a substantive impact on the fields understanding of disability and intervention.

In the United States, this deconstructionist perspective has been echoed by those in the disability studies and rights community, who have gone so far as to label special education as the "original sin"—suggesting that its foundational principles are inherently discriminatory (Cornett & Knackstedt, 2020, p. 507). Meanwhile, scholars from the Disability Studies in Education movement have advocated for full inclusion, with many taking an anti-realist view of disability and embracing it as a cultural and linguistic construct (Connor, 2020; Sailor & Taylor, 2023).

The differences between the special education perspective and the disability studies reimagination of special education as an inclusionary framework have been debated in the United States for many years (Kauffman, 2022). For example, Fuchs (2024) critiqued the assumption that simply placing students in inclusive settings improves outcomes, citing research in the U.S. demonstrating that many students with disabilities continue to lag academically despite increased inclusion efforts. He advocates for an inductive approach in which inclusion is continuously tested and refined based on evidence rather than ideology. While he acknowledges the moral and social justifications for inclusion, he emphasizes that effectiveness should be measured by actual student success rather than placement alone.

Despite ongoing concerns from the scientific community, the goal of including students with disabilities has emerged as an important macro-social validation goal (Walker et al., 1998) in special education in the US. Macro-social validation refers to the process of gaining recognition, approval, and valuing of a field's professional activities by larger constituencies such as the public and policymakers. Walker et al. emphasized the need for the field of special education to broaden its agenda beyond field-specific interests to address larger societal issues of importance. Currently, the inclusion of students with disabilities is one of the issues of significant importance, both in the US and internationally.

13. Inclusive Special Education

Inclusive Special Education (Hornby, 2014, 2015) offers a structured disability framework for interpreting the CRPD and integrating evidence-based interventions and inclusionary reforms while maintaining the core elements of special education. Hornby (2014) proposes an approach that incorporates arguably the best aspects of special education, drawing on the Inclusive Special Education framework and the principle of the Golden Mean as a balanced path forward. This inclusive special education framework allows for alignment between regular, inclusive, and special education, ensuring a balance between inclusion and specialized support. Furthermore, it maintains that special education research, policy, and practice retains a distinct role in effectively meeting the needs of students with disabilities (Anastasiou, Burke, Wiley, & Kauffman, 2024). Hornby (2015) defines Inclusive Special Education as:

"Educating children with special educational needs and disabilities (SEND) in the most inclusive settings in which their special educational needs can be met effectively, using the most effective instructional strategies, with the overarching goal of facilitating the highest level of inclusion in society post-school for all young people with SEND" (p. 236).

Inclusive Special Education (Hornby, 2015) presents a balanced and integrated model for integrating inclusive and special education practices within existing educational frameworks. The view promotes capacity building, enhancing accessibility and participation for all students based on their individual needs. At the same time, it upholds the necessity for specialized environments and supports for students whose needs cannot be met within general education settings. While the CRPD strongly emphasizes the welfare of the individual child, Article 24 also underscores the importance of reasonable accommodations. Article 2 defines reasonable accommodation as:

"Necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure

to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms" (United Nations, 2006, Article 2).

It is recommended that a realistic, incremental, evidence-based, and balanced approach be adopted (Kauffman et al., 2018) and it is considered that this approach, which Hornby (2015) refers to as Inclusive Special Education, aligns with the mission of the CRPD, particularly Article 24 (Education).

However, notably, the CRPD does not mention special education, a significant omission that could complicate the realization of inclusion. It is one thing to engage in disability and inclusion reform, and quite another to dismantle existing systems of support. The authors argue that including children with special educational needs in general education classrooms cannot be effectively implemented with validity and reliability without special education to provide equality and equity. Inclusion without special education may provide participation and bodily inclusion, but likely will not provide appropriate instruction for all students with disabilities (Kauffman et al., 2022). In an inclusive special education framework, collaboration with regular education is essential. However, even if there is an emphasis on inclusion as a human rights goal, special education must not lose its distinct functions, which are different from regular education.

Anastasiou et al. (2024) have explored the fundamental purpose (telos) of special education. They propose that special education serves three primary functions (a) *Research*: advancing knowledge and understanding of disabilities and effective educational practices. (b) *A Distinct System*: Establishing specialized structures and policies to support students with disabilities. (c) *Special Instruction*: Providing tailored or specialized teaching and instruction to meet the unique needs of these students.

14. Critical Areas in the Building Capacity for Inclusion

Rather than dismantling the current special education system in pursuit of full inclusion, a realistic and pragmatic approach—grounded in disability and inclusion realism—is needed in revitalizing the field (Burke & Felder, 2025; Kauffman et al., 2018; Kauffman, 2022). Such an approach respects the laudable goals of inclusion while ensuring that implementation is realistic, objective, and empirical. Each respective country that is building the capacity to serve students with disabilities in inclusionary settings will need to reflect on how to best pursue reform efforts. In our view, engaging in inclusionary reform should build capacity for an Inclusive Special Education and that builds on existing country specific support structures. The following recommendations should be considered by each nation in capacity building and inclusionary reform initiatives.

15. Recommendations for International Inclusionary School Reform

1. Evaluate Inclusive Special Education Practices

• Investigate the effectiveness of existing special education programs and policies.

• Identify evidence-based inclusionary special education practices.

• Develop data management programs to track how much time students with special needs spend in general education classrooms versus other environments, enabling better planning for inclusive special education practices (see Table 1 from the U.S. as an example).

2. General and Special Education Teacher Training and Professional Development

• Assess the current state of teacher training programs for special education, including pre-service and in-service training in both general and special education.

• Develop and implement enhanced teacher training to equip educators with specialized skills to support diverse learning needs in inclusive classrooms.

• Maintain and expand high-level training for special education teachers to ensure they are equipped to teach students with disabilities across all settings.

• Highly specialized and cross-categorical special education teachers are needed to meet the diverse needs of students with disabilities.

3. Resource Allocation and Accessibility

• Analyze resource distribution across different schools and regions to identify disparities.

• Develop strategies for equitable funding distribution, ensuring adequate access to technology, instructional support, and special education services for all students.

4. Societal Attitudes and Cultural Change

• Examine societal attitudes toward inclusion and disability diversity within both educational institutions

and the broader community.

• Develop and test initiatives that promote a culture of belonging and acceptance for students with disabilities.

• Foster inclusive mindsets among students, parents, educators, and policymakers.

5. Longitudinal Outcomes of Inclusive Special Education

• Conduct longitudinal studies tracking the academic, social, and emotional outcomes of students in inclusive and special education settings.

• Compare student outcomes across different models of inclusion to provide evidence-based recommendations for policy and practice.

16. Final Thoughts

To successfully implement international inclusionary reforms, it is essential to base decisions on empirical research, educational capacity building, and policy alignment with both special education and inclusionary principles. A pragmatic, realist, well-funded, and research-backed approach to Inclusive Special Education is necessary revitalize special education and to balance the goals of inclusion with the specialized needs of students with disabilities (Hornby, 2015; Kauffman, 2022; Kauffman et al. 2018; Kauffman et al., 2023). By following these evidence-based recommendations, policymakers, educators, and researchers can work towards a future where inclusive education is both achievable and meaningful—ensuring that all students, regardless of ability, receive equitable and high-quality education.

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