
MOVING TOWARD A MORE SOCIALLY JUST CLASSROOM THROUGH TEACHER PREPARATION FOR INCLUSION

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Abstract

The current literature in teacher education for social justice fails to adequately address issues of disability within the equity discourse. In this paper, the authors advocate for a model of social justice teacher education that includes disability as part of the definition of marginalized groups by proposing the use of Response to Intervention (RTI) as a method for promoting inclusion into the social justice-oriented teacher preparation context.

Moving Toward a More Socially Just Classroom through Teacher Preparation for Inclusion

In response to the ever-changing demographic of students in K-12 schools, teacher education programs throughout the United States are increasingly emphasizing issues of social justice and equity as central components to their teacher preparation agenda. While teaching for social justice has become increasingly prominent in preparing teachers for urban schools in particular, there still remains significant ambiguity as to how to define “social justice” in teacher education (McDonald & Zeichner, 2009). To help clarify it, Cochran-Smith, Ludlow, Ell, O’Leary and Enterline (2012) identify four common themes related to the redistribution and recognition present in the literature focused on teacher education for social justice that include:

1. Significant disparities in the distribution of resources and opportunities between minority and/or low-income students and their White, middle-class counterparts;
2. Long-standing policies, practices, and structures in addition to larger social policies that privilege dominant groups and disadvantage other groups;
3. Inequities in opportunities and outcomes as well as lack of recognition of the knowledge traditions of minority groups; and,
4. The role of teachers to build on cultural and linguistic resources students bring to school to broaden the curriculum and build new knowledge.

In general, the literature on social justice teacher education has referred to minority groups and marginalized groups only along the lines of race, language, and socio-economic status. Kumashiro (2000) extends the definition of marginalized groups to include gender and sexuality as considerations in his social justice oriented, anti-oppressive educational framework. Although Kumashiro (2000) argues that his presented could be extended to students with disabilities, he

does not explicitly include this group in his analysis. Significantly absent from the conceptualization of social justice teacher education is the inclusion of disability as a category of those groups that have been traditionally marginalized.

Furthermore, the Disability Rights Movement; Disability studies; Critical Race Theory; Queer Theory; and Lesbian, Gay, Bisexual, and Transgender (LGBT) activism all offer separate, yet similar, voices in challenging who is at the center (normal) and who has been placed at the margins (e.g. “abnormal,” “minority,” “queer,” and “other”) and how these “others” have been marginalized (Oyler, 2011). Disrupting the unquestioned assumptions that position students in the margins based on normative notions of performance and participation is critical to understanding the key roles teachers can play in socially just and inclusive classrooms (Ashby, 2012). Just as social justice teacher educators teach students about White Privilege and Class Privilege, Able-Bodied Privilege can be incorporated into the social justice curriculum. Considerations of subtle forms of discrimination and oppression in regards to barriers to access and meaningful engagement in the classroom ought to be addressed.

In our introduction, we problematize the exclusion of disability from the discourse on teaching for social justice and argue that the lack of explicit inclusion in social justice teacher education contributes to the continued exclusion of students with disabilities from general education settings. The purpose of this paper is to advocate for a model of social justice teacher education that includes disability as part of the definition of marginalized groups. We do so by proposing the use of Response to Intervention (RTI) as a way to promote inclusion in teacher preparation that includes disability as being central to the social justice teacher education agenda. We begin with a brief overview of the literature on inclusive education at the K-12 level before exploring the implications of translating the inclusion theory into practice, which advocates for the use of RTI at the K-12 level. We conclude with recommended applications of RTI principles in the teacher education context. By considering what we know works in inclusive education in K-12 settings, we hope to better understand how we can contextualize an approach to social justice teacher education inclusive of disability.

Defining Inclusive Education

The term “inclusive education” is defined as the practice of educating all students in general education classrooms with the appropriate provisions and supports they need (Lalvani, 2013; Landorf, Rocco, & Nevin, 2007). A major goal of inclusive special education is to foster an environment where every child feels welcomed, appreciated, and supported (Landorf et al., 2007). This conceptualization is often misconstrued with mainstreaming, which refers to providing students with disabilities different levels of opportunities to work and interact with their general education peers throughout the school day (Lalvani, 2013). While interpretations of inclusive education vary, in recent years a new body of literature has posited that “inclusive education is less about disability than it is about democracy and asserting that inclusive practices should be grounded in general education reform and framed in the context of social justice” (Lalvani, 2013, p. 16).

Teachers tend to view inclusive education as only being accessible to students with high incidence disabilities, but they tend to believe that students with severe, cognitive, or multiple disabilities do better in self-contained classrooms (Trent, Kea, & Oh, 2008). This notion is similar to the medical model, which views a child’s disability as a limitation and a biological impairment (Gartner & Lipsky, 1987; Oyler, 2011). The assumption is that the source of the disability resides in the child and becomes an attribute of the student as opposed to the responsibility of the school to provide the sufficient supports and services necessary (Gartner & Lipsky, 1987). Through the medical model perspective, students with disabilities are either placed in a general education setting or are pigeon-holed into a non-inclusive classroom based on their ability (Lalvani, 2013).

In contrast to the medical model, those individuals who view disability through a social model lens, interpret education of students with disabilities through issues of civil rights and equitable education. Instead of viewing inclusion from the perspective of impairments and limitations, it shifts the focus on “institutional practices and policies that oppress and marginalize some students” (Lalvani, 2013, p. 16). The social model of inclusion provides a way to view every student as an individual and challenge normalcy as part of teaching for social justice by reframing disability as the responsibility of educators to meet students where they are.

A study conducted by Lalvani (2013) explored teacher beliefs of students with disabilities to develop a better understanding of how teachers conceptualize inclusive education. Findings from the study revealed that teachers could be grouped into three themes: (1) inclusion as privilege, (2) inclusion as compromise, and (3) inclusion as social justice. Teachers with a disposition towards inclusion as a privilege believe that inclusive education is beneficial for some students with disabilities; whereas, other students’ educational needs cannot be met appropriately in a general education setting. Teachers who view inclusion as a compromise feel that while inclusive environments have social and emotional benefits for students with disabilities, they are at the expense of learning academic content and receiving individualized instruction. Teachers who viewed inclusion as social justice believe that the majority of students benefit from inclusive settings, and that children’s learning and development is “situated in sociocultural contexts and inextricably linked with issues of power and privilege” (Lalvani, 2013, p. 22). For these practitioners, the variance that exists among student’s educational experiences is largely attributed to inequities in societies and inequitable assessment practices. From their perspective, each student has the right to an equitable education, which is not just limited to students with disabilities.

Translation of inclusion discourse into practice

There is a long history of inclusion in name but not in practice and an even longer history of excluding students with disabilities altogether from public education (Goodheart, 2004; Osgood, 1997; Tropea, 1987). The pattern is to include previously excluded populations, but to exclude them from full participation. This has taken the form of first a segregated school, then a segregated classroom, and now a range from full inclusion in general education to full exclusion in a separate classroom or school. While the trend of including students with disabilities in general education is improving, over half of all students with disabilities continue to be served in special education settings for more than 80% of the their day (U.S. Department of Education, 2011). Currently, there is no longer a debate about the need to support students with disabilities. There is, however, a debate about how best to deliver such supports and services to a broad range of students.

If not done well, inclusion can lead to a similar historical pattern of increased inclusion in place, but continued exclusion in practice. For example, the inclusion of students functioning below-grade level or in need of behavior support in such classrooms can lead to physical place-based inclusion, but continued instructional exclusion. Under a social justice model of inclusion, an expansion of accessing the general education curriculum and tasks is necessary to include participation in more than just language and reasoning tasks (Tomlinson & Imbeau, 2012). Inclusion can be accomplished through differentiated instruction. Teachers can differentiate instruction by addressing content (what is being taught), process (how it is being taught), product (how students demonstrate learning), and environment (physical arrangement of the classroom) in order to meet diverse student needs (Santangelo & Tomlinson, 2012).

While Tomlinson and Imbeau (2012) argue that general education teachers should differentiate instruction so that all students are benefiting from instruction in the general education setting, they also acknowledge the difficulty teachers have in implementing differentiated instruction. If instruction is to be truly differentiated so all students are learning at

that same time, a model must be provided to reach that goal. In addition to differentiated instruction, students with disabilities require specially designed instruction. Thus, we need a model that provides both specially designed instruction for students with special needs and differentiated instruction for all students.

Legally, inclusion has been addressed through Least Restrictive Setting as part of the Individuals with Disabilities Education Act (IDEA) (2004). IDEA has been operationalized through a continuum of place-bound services (e.g. placement) ranging from full inclusion in the general education setting to splitting a percentage of a student's day between the general education setting and the special education setting to full exclusion in special education classrooms or separate schools. When students split their time between general education and special education settings, often referred to as a "pull-out" model, students are removed from the general education classroom to receive specially designed instruction in a special education classroom (Friend & Cook, 1996). In this model, special education teachers typically pull-out a small group of students with similar ability levels from different classrooms to deliver specially designed instruction in one academic area or behavior skill area at a time in a special education setting. The pull-out model does not allow for the full inclusion of students with disabilities in the general education setting.

More recently, a "push-in" model of service delivery has been advocated, in which students with special needs receive their specially designed instruction within the general education classroom. The push-in model requires co-teaching, which may be one approach for addressing the challenge of providing differentiated instruction and specially designed instruction within the general education classroom. Co-teaching is defined as two teachers delivering instruction in one physical space (Cook & Friend, 1995). In the case of including students with special needs in the general education setting, co-teaching includes one general education teacher and one special education teacher, or related service specialist, providing differentiated instruction and specially designed instruction in the general education classroom.

One benefit of a co-teaching model is that all students (not just those in special education) in the classroom benefit from this model (Cook & Friend, 1995). For example, students in general education may benefit from the expansion of instructional practices provided by the special education teacher and the reduction in student teacher ratio. Furthermore, students in special education may benefit from the expansion of instructional practices provided by the general education teacher and modeling of pro-social classroom behavior by their general education peers (Cook & Friend, 1995).

Both the pull-out and push-in models rely on the continuum of the services model where specially designed instruction is provided to students. Thus, inclusion becomes a percentage of time the student is "placed" in general education and special education settings. In addition, both the pull-out and push-in models are reactive in that students must first have an educational impact large enough to make them eligible for special designed instruction. This may inadvertently allow students who are not demonstrating success in the general education setting to continue to be "included" in general education until they are sufficiently unsuccessful enough to be eligible for specially designed instruction. Not providing services to students until they are significantly below grade level is by no means socially just.

Response to Intervention (RTI) offers a systematic way to both include students with disabilities by shifting the focus of inclusion from placement in either special education or general education settings to providing sufficient supports and services to all students. Thereby, RTI simultaneously addresses the prevention of school failure as well as increasing academic achievement and social skills for all students including, but not limited to, students with disabilities.

RTI: A Model For Inclusion

Federally supported, RTI is a preventative model that has been successful at preventing academic and behavioral failure at the school building level (Bradshaw, Mitchell, & Leaf, 2010; Gettinger & Stoiber, 2008). RTI changes the focus of school failure from remediating students to continually assessing students' response to interventions. RTI is a systematic method for identifying and delivering sufficient supports and services based on data so that all children can be successful in school. The core components of RTI are: multi-tiered model, universal screening, continual progress monitoring, and data-based decision making (National Center on Response to Intervention, 2010).

In the RTI model, assessments are used to identify students in need of additional support to be successful in school. Academic and behavior support are provided at tiered levels – Tier I, Tier II, and Tier III – in this model, which provides students with increasing support. In Tier I, for example, all students are provided universal supports in an attempt to ensure that most of the school population is successful with this level of support. Universal supports include research-based core curriculum, culturally responsive instruction, universal screening, differentiated instruction, accommodations, and behavioral support (National Center on Response to Intervention, 2010). Schools using RTI should first focus on providing primary prevention supports until a minimum of 80% of the student population is successful as measured by a universal screener and associated progress monitoring assessments.

Tier II is designed to provide up to 20% of the student population additional supports and services in order to help them succeed academically and behaviorally at school. Students continue to receive the universal supports provided in Tier I in addition to secondary preventative supports in Tier II. Although, RTI provides a model of support, it does not designate specific supplementary supports. They do, however, promote the fidelity of implementation evidence-based interventions that are typically delivered in a small group setting as part of Tier II supports. The effectiveness of the supplementary supports for students is evaluated by changes in student outcomes as measured by progress monitoring assessments. Additional supports and service designed to increase the intensity of Tier II supports should be provided until 95% of the entire student population (this figure includes the 80% of students in Tier I and 15% of the 20% of students in Tier II) are successful.

Tier III is designed to provide 1-5% of the school's student population intensive individualized support, which is in addition to all of the universal and secondary level supports provided in Tiers I and II. In Tier III, the intensity of the interventions increase by increasing the frequency of the small group sessions, the length of those small group sessions, and/or a decrease in the size of the small group (National Center on Response to Intervention, 2010). In addition, teachers may need to accommodate the evidence-based intervention to meet individual students needs and assess the student's response to those accommodations with more frequent progress monitoring because students who require Tier III support have a history of not responding to evidence-based interventions previously provided (National Center on Response to Intervention, 2010).

In some RTI models, students who need more support than provided in Tiers I-III will be referred to specialists for further evaluation, which is recognized as Tier IV (Fuchs & Fuchs, 2006). In schools implementing a four-tier model of RTI, students in Tier IV who qualify for special education would be provided specially designed instruction. Where and when specially designed instruction is delivered depends on which model of service delivery the school is currently providing, typically the aforementioned pull-out or push-in/co-teaching model. Murawski and Hughes (2009) argue for the collaboration between special and general educators by combining push-in/co-teaching and RTI in order to provide inclusive supports and services for all students in the least restrictive setting.

Practically, it cannot be denied that there will always be a percentage of the population that will require additional supports and services above and beyond what is typically provided by schools. RTI is a systematic way to identify all students who need additional supports and

services as well as evaluate the effectiveness of an intervention through screening and monitoring. The RTI model eliminates the need to label students before additional supports and services can be provided while ensuring that all students receive the level of supports and services they need. If RTI is to be successful, teachers must be prepared to implement and work within this model.

Teacher Preparation for Inclusion

Due to educational accountability policies requiring all student subgroups, including students with disabilities, to make learning gains and IDEA's (2004) mandates emphasizing the need for students with disabilities to engage the general curriculum, it is paramount inclusivity is a priority of teacher education programs. Historically, preparing teachers to work with students with disabilities has occurred in a dual system of general and special education. Blanton and Pugach (2007) offer a conceptual framework in examining the common structures of teacher education programs for inclusion. The models presented by Blanton and Pugach (2007) refer to: (a) the degree of collaboration among faculty whose primary responsibility is to prepare general education teachers and those whose primary responsibility is to prepare special education teachers, and (b) the extent to which curricular components from general and special education programs are integrated and coordinated through a process of collaborative program development/redesign. There are then three program structures that describe the spectrum of teacher education programs for inclusion:

1. *Discrete programs* refer to teacher education in which there is little, if any, relationship between programs or collaboration between faculty who prepare general and special education teachers.
2. *Integrated programs* are defined as programs in which general and special education faculty engage in intentional and coordinated program-level efforts to accomplish a significant degree of curricular overlap.
3. *Merged programs* prepare general and special educators in a single curriculum, with a complete integration of courses and field experiences designed to address the needs of all students, including those who have disabilities.

In light of the challenges and the various structures of teacher education programs in preparing teachers to work in inclusive classrooms, we propose considerations for creating inclusion into social justice teacher education program.

Challenging Normalcy

Challenging dominant notions of normalcy in education can be an act of resistance (Ashby, 2012). Questioning the normalcy of many school practices such as tracking, ability grouping, and an emphasis on verbal linguistic as ways of learning can provide students with opportunities to “unlearn” some of the assumptions of what is valued in school culture. Inclusive teacher preparation programs ought to instead of redefining “normal” provide a space for valuing a plurality of perspectives and ways of being (Ashby, 2012). A Disabilities Studies approach towards teacher education encourages teachers and students to challenge dominant cultural attitudes about ability and disability (Ashby, 2012).

In order to move towards an increasingly socially just model of teacher preparation, the inclusion of students with disabilities as part of the discourse must be prioritized. Whether this occurs through changing the social justice teacher preparation paradigm to explicitly include ableism as an elevated priority or if this approach widens the definition of inclusive education to include other traditionally marginalized groups (e.g. race and gender), the exclusion of the

“disabled other” will continue to hinder the dialogue of social justice teacher preparation from moving forward.

Faculty Collaboration

While collaboration in teacher education can be difficult work, it is also essential work considering the need for all teachers to be prepared to work effectively with students who have disabilities. Although many teacher education programs have taken steps to engage in some initial level of collaboration so that all teachers are better prepared to teach all students, often the practical outcome has been the requirement of a single course in areas such as special education (Blanton & Pugach, 2007). While requiring a single course can certainly be helpful, it fails to provide a robust, systematic integration of special and general education across all aspects of the teacher preparation curriculum. In addition, it fails to address the relationship between disability and other aspects of diversity (Blanton & Pugach, 2007). An additive approach, where special education content is appended to an existing curriculum also fails to situate content related to disability within other communities of diversity (Pugach & Blanton, 2012). Resulting from their national survey of pre-service general and special education teacher preparation programs, Harvey, Yssel, Bauserman, and Merbler (2010) recommend that pre-service teacher education programs should develop a shared vision of program practice and philosophy, establish an integrated program, and provide opportunities for special education and general education to work collaboratively on pre-service training activities and opportunities.

We suggest the RTI framework as a potential mediating space where both general and special educators can further collaborate in the context of teacher preparation. Although RTI is traditionally taught in special education coursework, in practice, general educators are critical to the implementation of RTI at the Tier I level and possibly Tier II and Tier III levels to prevent students from being labeled inaccurately with a disability. RTI should be central to a social justice teacher education program focused on inclusion of all students including, but not limited to, students with disabilities. RTI necessitates the collaboration between general education and special education teachers in order to meet all students needs and thus provides a common ground for all pre-service teachers with a shared language, processes, and a range of responsibilities and areas of expertise to reach the common goal of providing socially just inclusive education for all students.

Inclusive Teacher Education for Social Change

When disability is viewed through a lens of social construction, as opposed to the traditional medical model, context is considered, and teachers are empowered to alter the context and environment as they see fit (Ashby, 2012). Teachers can play key roles in either re-inscribing or destabilizing notions of ability and disability. Seeing themselves as agents of change in schools, teachers can continue to strive towards creating more just and inclusive school communities.

While the roots of the definition and philosophy of inclusion have traditionally been tied to students with disabilities, it is increasingly viewed as addressing the need for educational equity and access for all students who are marginalized- not only those with disabilities (Artiles, 2011). Oyler (2011) writes in her analysis of the merged inclusive teacher preparation program in the Teachers College at Columbia University that many of her colleagues – though sharing many common critiques about oppression and marginalization stemming from race, ethnicity, social class, gender, sexual identities and orientations, religions, and home language – are surprisingly less committed when it comes to the marginalization of students with disabilities. In moving forward, it is critical that more expansive notions of inclusive education through the RTI model be applied to social justice teacher preparation programs.

Conclusion

In this paper, we have argued that current models of social justice teacher education have failed to emphatically include students with disabilities as part of the discourse surrounding traditionally marginalized communities. RTI provides a model in which all students can receive the supports and services they need without requiring labels to access additional supports and services while simultaneously focusing preventing the need for those labels. Preparing teachers to work with students with disabilities has taken on increasing importance in light of current rights legislation and national educational policy. While preparing teachers to work with students with disabilities has traditionally taken place in exclusively special education teacher preparation courses, the changing collaborative frameworks (merged, combined) of higher education teacher preparation offer hope for more fluid, connected spaces of teacher learning through RTI for all educators preparing to work in both the general education and special education classrooms.

References

- Artiles, A. J. (2011). *Inclusive Education: Examining Equity on Five Continents*. In A. J. Artiles, E. B. Kozleski, & F. R. Waitoller (Eds.). Cambridge, MA: Harvard Education Press.
- Ashby, C. (2012). Disability Studies and Inclusive Teacher Preparation: A Socially Just Path for Teacher Education. *Research & Practice for Persons with Severe Disabilities*, 37(2), 89–99.
- Blanton, L. P., & Pugach, M. C. (2007). *Collaborative programs in general and special teacher education: An action guide for higher education and state policy makers*. Washington, DC: Council of Chief State School Officers.
- Bradshaw, C. P., Mitchell, M. M., & Leaf, P. J. (2010). Examining the effects of schoolwide positive behavioral interventions and supports on student outcomes: Results from a randomized controlled effectiveness trial in elementary schools. *Journal of Positive Behavior Interventions*, 12(3), 133-148.
- Cochran-Smith, M., Ludlow, L., Ell, F., O'Leary, M., & Enterline, S. (2012). Learning to teach for social justice as a cross cultural concept: Findings from three country study. *European Journal of Educational Research*, 1(2), 171-198.
- Cook, L., & Friend, M. (1995). Co-teaching: Guidelines for creating effective practices. *Focus on Exceptional Children*, 28(3), 1-16.
- Friend, M., & Cook, L. (1996). *Interactions: Collaboration skills for school professionals* (2nd ed.). White Plains, NY: Longman.
- Fuchs, D., & Fuchs, L. S. (2006). Introduction to response to intervention: What, why, and how valid is it? *Reading Research Quarterly*, 41(1), 93-99. doi: 10.2307/4151803
- Gartner, A., & Lipsky, D. K. (1987). Beyond special education: Toward a quality system for all students. *Harvard Educational Review*, 57, 367-395.
- Gettinger, M., & Stoiber, K. (2008). Applying a response-to-intervention model for early literacy development in low-income children. *Topics in Early Childhood Special Education*, 27(4), 198-213.
- Giroux, H. & McClaren, P. (1986). Teacher education and the politics of engagement: The case for democratic schooling. *Harvard Educational Review*, 56(3), 213–238.
- Goodheart, L. (2004). Rethinking mental retardation: Education and eugenics in Connecticut, 1818-1917. *Journal of the History of Medicine and Allied Sciences*, 59(1), 90-111.
- Harvey, M. W., Yssel, N., Bauserman, A. D., & Merbler, J. B. (2010). Pre-service teacher preparation for inclusion an exploration of higher education teacher-training institutions. *Remedial and Special Education*, 31(1), 24–33.
- Individuals With Disabilities Education Act, 20 U.S.C. § 1400 (2004)
- Kumashiro, K. K. (2000). Toward a theory of anti-oppressive education. *Review of Educational Research*, 70(1), 25–53.
- Lalvani, P. (2013). Privilege, compromise, or social justice: Teachers' conceptualizations of inclusive education. *Disability & Society*, 28(1), 14–27.
- Landorf, H., Rocco, T., & Nevin, A. (2007). Creating permeable boundaries: Teaching and learning for social justice in a global society. *Teacher Education Quarterly*, 34(1), 41-56.
- McDonald, M., & Zeichner, K. (2009). Social justice teacher education. *Handbook of Social Justice in Education*, 595-610.
- Murawski, W. W., & Hughes, C. E. (2009). Response to intervention, collaboration, and co-Teaching: A logical combination for successful systemic change. *Preventing School Failure*, 53(4), 267-277.
- National Center on Response to Intervention (March 2010). *Essential components of RTI – A closer look at response to intervention*. Washington, DC: U.S. Department of Education, Office of Special Education Programs, National Center on Response to Intervention.

- North, C. (2008). What is all this talk about “social justice”? Mapping the terrain of education’s latest catchphrase. *Teachers College Record*, 110(6), 1182 -1206.
- Osgood, R. (1997). Undermining the common school ideal: Intermediate schools and ungraded classes in Boston, 1838-1900. *History of Education Quarterly*, 37(4), 375-398.
- Oyler, C. (2011). Teacher preparation for inclusive and critical (special) education. *Teacher Education and Special Education*, 34(3), 201–218.
- Pugach, M. C., & Blanton, L. P. (2012). Enacting diversity in dual certification programs. *Journal of Teacher Education*, 63(4), 254–267.
- Santangelo, T., & Tomlinson, C. A. (2012). Teacher educators' perceptions and use of differentiated instruction practices: An exploratory investigation. *Action in Teacher Education*, 34(4), 309-327.
- Tomlinson, C. A., & Imbeau, M. B. (2012). Common sticking points about differentiation. *School Administrator*, 69(5), 18-22.
- Trent, S. C., Kea, C. D., & Oh, K. (2008). Preparing pre-service educators for cultural diversity: How far have we come? *Exceptional Children*, 74(3), 328–350.
- Tropea, J. (1987). Bureaucratic order and special children: Urban schools, 1890s-1940s. *History of Education Quarterly*, 27(1) 29-53.
- U.S. Department of Education. (2011). *30th annual report to Congress on the implementation of the Individuals with Disabilities Education Act, 2008*. Washington, D.C.