his or her non-disabled peers is not assured. With few exceptions, Canadian school boards have generally offered options that have become the standard both in this country (Csapo and Goguen, 1980) and in the United States under Public Law 94-142 (Gartner and Lipsky, 1987):

- "pull-out" resource room programs for students with mild disabilities;
- segregated schools or segregated classes in regular schools for students with moderate or severe disabilities;
- individual cases of integration for students with moderate disabilities.

However, while education is an area of provincial jurisdiction, the context in which provincial education legislation operates underwent a dramatic shift when the Canadian *Charter of Rights and Freedoms* was entrenched in the Canadian constitution in 1982. Several sections of the *Charter* have implications for policy and practice relevant to the education of students with mental and/or physical disabilities (MacKay, 1984; Vickers and Endicott, 1985). It has been suggested that the aspects of education legislation which are most subject to challenge under the *Charter* are procedures for: student assessment and categorization; placement; the discretion to exclude students from regular classrooms; and the very concept of segregated education (Robertson, 1987).

The *Charter* created a new environment in which the overriding principles of liberty, freedom from discrimination, and freedom of association set broad parameters within which education systems must operate. Since the equality rights in the *Charter* did not come into force until 1985, the assurance of equality rights in many areas is still in the process of being established. However, it is the opinion of some that segregated educational programs are a natural target for litigation based on the *Charter* (Donahue, 1988; MacKay, 1987a). In any event, there has been an increased awareness of and sensi-