Teachers College **Record**
The Voice of Scholarship in Education

Promoting Access Through Segregation: The Emergence of the "Prioritized Curriculum" Class

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The continuously evolving standards-based reform (SBR) movement is one of the most prominent features of today's educational policy landscape. As SBR has continued to drive educational policy, local schools and districts have adopted many approaches to comply with legal mandates. This paper critically examines one particular resultant phenomenon of the SBR movement—the emergence of a new track of self-contained classes called Prioritized Curriculum classes, designed to provide students with disabilities access to standards-based general education curriculum, but in a segregated class. In this article we document the emergence of such courses and critically analyze the rationales and policy loopholes that have led to their creation.

INTRODUCTION: STANDARDS-BASED REFORM

The continuously evolving standards-based reform (SBR) movement is one of the most prominent features of today's educational policy landscape. The current SBR movement in the United States is defined as a national set of standards linked to standardized tests, accountability systems, and teacher and leader evaluations. SBR is a part of a neoliberal agenda (Apple, 2004), emphasizing labeling and restructuring of underperforming schools, while offering school "choice" to students and families. Although its roots can be traced at least as far back as the 1970s (Amrein & Berliner, 2002), the No Child Left Behind Act (NCLB) of 2001 was the first federal legislation mandating that states adopt elements of SBR in the United States. Key tenets of NCLB require that: state standards are aligned with proficiency exams; individual schools meet accountability targets or face sanctions; and test scores be disaggregated by race, ethnicity, income level, and disability.

Race to the Top (RttT), a successor to NCLB, is a federally funded incentive grant program that required states to comply with certain educational priorities of the Obama administration. The RttT website lists four priorities, including: adopting rigorous standards and assessments (including national common core standards); recruiting, developing, retaining, and rewarding effective teachers and principals; building data systems to measure student success; and turning around the lowest-performing schools (U.S. Department of Education, 2013).[1] Since 2011, 19 states and the District of Columbia have received RttT grants securing SBR as a continued feature of federal education policy. As SBR has become an influential aspect of educational policy, school districts have adopted many approaches to comply with these legal mandates. In this article, we critically examine one particular resultant phenomenon of the SBR movement—the emergence of a new track of self-contained "prioritized curriculum"[2] (PC) classes designed to provide students with disabilities access to standards-based general education curriculum at a modified pace.

As scholars and researchers working in urban schools, we first encountered PC classes while conducting research in an urban district in central New York State as it responded to SBR. As we subsequently expanded research in the New York City and northern New Jersey areas, we confirmed similar classes there. We were curious as to the extent of this phenomenon, so we surveyed colleagues through an education-based listserv and at a national conference. We quickly received a flurry of responses documenting similar classes from scholars across the country. We also conducted an extensive web search using terms that colleagues mentioned: Prioritized Curriculum; Replacement or Focused Curriculum; and standards-based courses. Despite the lack of empirical research on the efficacy of these and similar classes, these courses have quickly become a fixture in many schools across the nation.

We were surprised by the swift and widespread creation and utilization of PC classes, which seemed to come out of nowhere. As critical special educators and disability studies scholars committed to inclusion, we were wary of the appropriation of PC classes by states and school districts in relation to the pressures of SBR, rather than in response to specific student learning needs. We were specifically concerned that the proliferation of PC classes marked a clear move away from commitments to inclusion and provisions within IDEA (Individuals with Disabilities Education Act), which assure that students with disabilities are to be educated in the Least Restrictive Environment (LRE). Indicating a strong and unwavering preference for educating students with disabilities in general education classrooms, the IDEA has included the LRE provision since 1975. The statute states that children should be removed from general education settings "only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily" (20 USC 1412(a)(5)).

Once students with disabilities were required to be counted toward participation within SBR and given the provision of LRE in the law, we assumed that more students with disabilities would be provided with access to grade-level curricula within general education classrooms. Yet, the emergence of the PC class as a mechanism for providing access to general education content has proven otherwise. In this paper we explore how the pressures and policies related to SBR have simultaneously promoted access to general education curricula while concomitantly inhibiting access to general education classrooms for students with disabilities.

RESEARCH ON SBR POLICIES AND STUDENTS WITH DISABILITIES

One significant shift related to SBR is that most students with disabilities are now required to participate in statewide assessments. Prior to NCLB, students with disabilities were inconsistently integrated in large-scale testing (McLaughlin & Thurlow, 2003) and advocates fought fiercely for their inclusion in order to put them on an equal playing field with their non-disabled peers (McLaughlin,

Miceli, & Hoffman, 2009). NCLB continued, however, to permit students with the most "significant" disabilities to take alternate assessments. Due to the impact on students with disabilities, the Individuals with Disabilities Education Improvement Act (IDEIA, 2004) was amended to better align with NCLB. Students' Individual Education Plans (IEPs), for instance, now had to document participation in state tests.

Research documenting the impact of SBR policies on students with disabilities and on special education practice has been mixed (Cole, 2006; Katsiyannis, Zhang, Ryan, & Jones, 2007; Ysseldyke et al., 2004). A beneficial impact of SBR for students with disabilities is increased access to the general education curriculum (Defur, 2002; Quenemoen, Lehr, Thurlow, & Massanari, 2001; Thompson & Thurlow, 2003; Ysseldyke et al., 2004). SBR has been credited for promoting higher expectations for the achievement of students with disabilities (Coutrade, Spooner, Browder, & Jimenez, 2012; Thurlow, 2002). In a longitudinal study from four states, for instance, Lazarus, Thompson, and Thurlow (2006) found that students with disabilities had increased access to the general education curriculum and greater achievement gains as a result. Similarly, Cole (2006) documented that 77% of the 282 Indiana superintendents, principals, and directors of special education surveyed agreed that NCLB raised expectations for students with disabilities. Once students with disabilities were finally held accountable for general education content, educators were surprised they could succeed and began to believe in the potential of the students.

Nonetheless, detrimental consequences have also been reported as a result of SBR. Increased teaching-to-the-test (Amrein & Berliner, 2002; Jennings & Bearak, 2014) and a narrowing of the curriculum (Berliner, 2011; Christenson, Decker, Triezenberg, Ysseldyke, & Reschly, 2007) are significant negative consequences of SBR for all students. Scholars have also documented increased dropout rates for students with disabilities (Cole, 2006; Lillard & DeCicca, 2001) and lower graduation rates, particularly in states that link successful passage of exit exams to diploma requirements (Gaumer-Erickson, Kleinhammer-Tramill, & Thurlow, 2007). Drawing on archival and survey data from a southern state, Moore (2012) reported a declining graduation rate for students with disabilities between 2001 and 2010, resulting in a graduation gap between students with and without disabilities as a result of NCLB. Trend data shows substantially limited postsecondary and employment opportunities for students with disabilities (Wagner & Blackorby, 1996). SBR has had a particularly negative impact on students who are labeled with more "significant" disabilities.

STUDENTS WITH DISABILITIES AND ALTERNATIVE ASSESSMENTS

NCLB mandated that "all students participate in all state- and districtwide assessments . . . with accommodations or alternative assessments, if necessary, as stipulated in the pupil's IEP" (Gargiulo, 2012, p. 59). States are allowed to exempt 1% of all students (generally resulting in about 9% of students eligible for special education) from high-stakes tests. These exempt students must take alternate assessment aligned to modified achievement standards. However, the only guidance about who should qualify for the alternate test is the statement that states must abide by the 1% cap and that only students with "significant" disabilities should qualify. Thus, there continues to be a lack of clear understanding about which students with disabilities should (or should not) participate in alternate and/or modified assessments.

Allbritten, Mainzer, and Zeigler (2004) expressed concerns about whether including students with disabilities in accountability measures would result in them becoming scapegoats for school accountability problems. They also questioned whether districts would be able to fairly identify which students should take alternate/modified tests, particularly as states have leeway in creating algorithms for making such decisions. The authors cautioned that

> allowing states to develop definitions and eligibility criteria for alternate assessments based on alternate achievement standards is not consistent with existing professional terminology and definitions, which will complicate data collection and analysis at a time when accurate research evidence is sorely needed . . . [and it] may undermine the long-established IDEA policy of individualization within the context of the IEP development process. (p. 156)

To complicate matters, in 2007, the federal government added guidelines that allowed for a set of "modified content standards" to be taught and assessed for 2% of the population of students with disabilities (McLaughlin, 2010). Moreover, because the percentage of students who are deemed eligible for special education services varies from state to state, district to district, and even school to school, and because schools continue to group students with low incidence disabilities in particular schools, having a uniform percentage for all schools can result in vastly different groups of students who are considered exempt.

SBR AND ACCESS TO THE GENERAL EDUCATION CURRICULUM

As federal, state, and district policies continue to shift regarding how many students should be accountable to general education requirements, local school districts are left to interpret mandates without sufficient guidance. Many local districts have created structures to help students pass state tests by adjusting curricular expectations and the pace of instruction. In a four-year case study in California, Sandholtz, Ogawa, and Scribner (2004) found that the district's response to implementing SBR took an unforeseen turn. The district set out to create a curriculum that enhanced achievement and equalized opportunity for all students. In its effort to equalize educational opportunities, however, the district unintentionally exacerbated them. For instance, in an effort to raise achievement, the district actually modified state standards by at least one grade level and adopted the lower set of standards. The district also intentionally grouped students by ability and placed them into three tracks. The tracks were not based on special education status (e.g., special education students were represented across all three tracks), but the tracking system shared a similar underlying logic to the creation of PC courses for students with disabilities, because students were tracked into homogeneous ability groups based on perceived ability to excel on standardized exams. Sandholtz, Ogawa, and Scribner (2004) concluded that the new academic tracks resulted in low expectations for students in the minimal track and widened the gap between those in the minimal track and those in the accelerated track.

SBR AND SPECIAL EDUCATION SERVICES

Although schools and districts are held accountable for providing access to the general education curriculum for the majority of students with disabilities, a full continuum[3] of placement options has remained. IDEIA (2004), formerly IDEA, acknowledges that

> almost 30 years of research and experience has demonstrated that the education of children with disabilities can be made more effective by having high expectations for such children and ensuring their access to the general education curriculum in the regular classroom, to the maximum extent possible. (sec.601.5(A))

Yet federal guidelines only require that Individualized Education Plans (IEP) indicate how the student will participate in the general education *curriculum,* not the general education *classroom* (Hardman & Dawson, 2008), paving the way for PC classes. Thus, these policies have not adequately required or incentivized inclusive settings, despite provisions like the least restrictive environment (LRE). Moreover, because the accountability sanctions around SBR are more significant than sanctions for failing to meet LRE, schools often prioritize test scores over LRE, leaving students with less access to inclusive settings.

Another issue that has come up in the literature relates to a debate about what kind of curriculum students with disabilities *should* be taught in schools. Special education has historically emphasized life and functional skills curricula for many students with disabilities. Ryndak et al. (2014) illustrated how many educators viewed the inclusion of students with disabilities in the regular curriculum as difficult because they saw functional and academic curricula as mutually exclusive. If a student has on his or her IEP a required functional or modified academic curriculum, it is often assumed that they must be segregated. Thus,

> standards-based general curriculum is used as a justification for segregation of students with significant disabilities, who are taught "the standards" via decontextualized instruction in segregated settings, rather than being *involved in* the full general curriculum, as required by the law. (Ryndak et al., p. 69)

Such misunderstandings occur in part because of IDEIA's lack of clarity about whether LRE has to do with access to curriculum or to general education classrooms.

PURPOSE

There are as many interpretations of the law as there are local responses to how to best implement SBR for students with disabilities. The data we found examining the issue indicates that the impact of SBR and students with disabilities does not contradict the aforementioned research about the benefits and pitfalls of the law, but rather extends it to look at the simultaneous phenomenon of increased access to the general education curriculum (Ysseldyke et al., 2004) and associated increased physical tracking and segregation of students with disabilities. In other words, we focus specifically on how the emergence of the "prioritized curriculum" (e.g., PC) class has, in many ways, traded one aspect of inclusion (the physical access to the general education classroom) for another (access to the general education curriculum). This analysis extends prior research that documented that although students with disabilities were experiencing increased access to general education curricula because of SBR, this was not necessarily occurring in inclusive settings (Bacon & Ferri, 2013). We argue that PC classes were created in direct response to the pressures of the SBR movement, but continue to reflect many of the suppositions of traditional special education, particularly the assumption that children who are behind grade level and in need of a modified or differentiated curriculum are more effectively educated separately. We also document how districts, in attempting to provide access to the general education curriculum and increase test scores, are paradoxically reducing students' access to general education classrooms through tracking and narrowing of curricula. As scholars that have thoroughly researched the benefits of inclusive education, we find this trend particularly troublesome.

DOCUMENTING THE EMERGENCE OF PC CLASSES

In this section we describe the development of PC classes, focusing specifically on New York and New Jersey. Next, we examine the various stated rationales for offering PC courses at the secondary level. We examine the ways that educators and administrators justify the existence of these courses as well as how gaps in federal and state policy have allowed for their existence. We conclude with several concerns we have regarding the proliferation of these courses.

WHAT ARE PC COURSES?

Although researchers have raised concerns about SBR narrowing the general education curriculum, resulting in schools either implicitly or explicitly teaching to the test (Nichols & Berliner, 2005), the development and implementation of the PC class is a very recent phenomenon (our first encounter with a PC class was in 2010). PC classes are defined by the amount of general education content made available to students and the rate at which the content is covered; they are for special education students only. Generally, the scope of general education curriculum provided in PC classes is reduced such that students in these classes are only exposed to the most essential or "prioritized" aspects of the curriculum. One district, for example, quantified this by defining PC as covering approximately 75%-80% of the most critical aspects of the curriculum (Syracuse City School District, 2010).

Unlike other self-contained classes for special education students, subject areas and "essential content" for PC classes is generally aligned to standardized assessments. Within middle and upper elementary schools, PC classes might be offered in math and English/language arts (Gloversville Enlarged School District, 2013; Rome City School District, n.d. (1)). Within secondary schools, PC

classes tend to be exclusively aligned to subject areas tied to state assessments or required for graduation (Rome City School District, n.d. (2); Syracuse City School District, 2010).

One district's website describes the rationale for prioritized curriculum as a service for students who "require a smaller, more structured learning environment than the regular education classroom can provide . . ." in which "instruction is provided to students for specific classes . . . as opposed to receiving instruction in the regular education classroom" (Gloversville Enlarged School District, 2013). Similarly, another district's newsletter describes the appropriate candidate for a PC class. They suggest that

> students may need PC classes if the impact of their disability prevents them from fully accessing the general education courses with lower levels of special education support and general education instruction support (resource, consultant teacher direct/indirect, AIS and other interventions). (Syracuse City School District, 2010, p. 7)

Both districts here suggest that only minimal supports are available in inclusive or general education classes. Thus, students who require more intensive or structured supports must receive them in segregated placements. Both statements violate LRE by restricting placement. Furthermore, both statements suggest that the impact of the student's disability is the determining factor in whether the child can have access to an inclusive setting, despite the fact that each district is rigidly defining general education as a placement in which only minimal supports are available.

Rather than questioning the necessity of self-contained classes for students who would otherwise be taught inclusively or considering a wider range of supports that could be offered in inclusive settings, district officials assume that if students need a modified standards-based general education curriculum, a segregated placement will be more effective and appropriate. In fact, some administrators we spoke to expressed that they wished there were options like PC classes for non-disabled students. As one district administrator explained:

> In the PC [class, it has to be] all [students with] IEPs. Can't have it any other [way]—let me tell you there's a lot of schools that would like to put gen. ed. kids in those rooms, [because] they would probably pass the course. But, we're like, "No, it has to be pure." It makes sense because there are definitely kids that are slow learners and they may have cognitive scores in the 70s [who] don't qualify [for special education services]. . . . So, it's like they don't qualify as a student with a disability, but they're definitely a slow learner. Put them in that kind of class and they probably would do well. But we only have a certain number of slots and obviously, I want them going to my [special education] kids because we're facing . . . graduation rate[s] in the 30s, you know for our kids [with disabilities]. (Bacon, 2012, p. 164)

The administrator then linked the PC class with increased test scores:

> What we're finding is in those classrooms—we had about a 23% pass rate in Algebra I. For example, in the past—last year . . . one of our high schools had a 57% pass rate for Algebra I for students with disabilities. That's the first year we're doing it and she's got this—you know, more than 100% increase in that [score] because it's no more than 15 kids, it's intensive, so the kids are experiencing that success. (Bacon, 2012, p. 165)

The administrator continued to explain the process he followed to determine what elements of the curriculum would be included in PC courses. He clarified that both general and special education teachers were involved in the decision-making process. He described how the team looked through the curriculum, for instance in Algebra I, and "literally black lined parts of that curriculum. They just said, 'You don't need to know this; this is not a priority'" (Bacon, 2012, p. 164). Thus, "black lining" portions of the general education curriculum and teaching students in a segregated setting is seen as the most viable solution for raising test scores.

"REPLACEMENT" CLASSES AND THE CODIFICATION OF POLICY IN NEW JERSEY

In 2015, the state of New Jersey codified Replacement Courses (another name for PC) as part of its continuum of service options for students with disabilities under state policy. These courses are defined in the regulations as "replacement pull-out resource programs" that offer "specialized instruction organized around a single subject and are provided to students with disabilities by an appropriately certified teacher of students with disabilities" (N.J.A.C. 6A:14, 2015, p. 101). Not surprisingly, numerous districts throughout the state describe these courses as part of their continuum of services. One educator that we spoke with in New Jersey described the current status of these courses for her students in English Language Arts and Math. She noted that

> The replacement classes that my kids are in, we are kind of going back and going over all of the basics. Because a lot of things that they do, they know it, but they haven't carried it over from previous years. Right now in math, my kids are getting ready for the PARCC, the state test in New Jersey. We are getting *really* ready for that. We are just going over the basics and getting them acquainted with the test so they are not super overwhelmed. Some of them just have trouble with adding, subtracting, multiplying, and dividing. So, that is what we have been working on, and every week we try to do a review of all of those things. And then in language arts, we are pretty much on the same track as the other language arts class; they [the students] are just getting things modified and learning how things will be on the tests.

When asked about the makeup of the students in the replacement class, she stated that

> There are eight students in the language arts class and it is taught by the special education teacher. Then the math class is five students taught by the special education teacher. I think the Replacement Courses have been in place for a long time and that is just how our school district works. I know they have talked about trying to get rid of it and trying to do all inclusive

classes, but I just think the district does not want that. From my perspective I feel as though the students that I work with, I think they would benefit [from more inclusive placements], but I think the pace that the regular class goes at is a little too fast for them and I think that they would fall behind.

She explained that the special education teacher is the teacher of record in these courses, and the law states that "the resource program teacher shall have primary instructional responsibility for the student in the replacement program and shall consult with the general education teacher as appropriate" (N.J.A.C. 6A:14, 2015, p. 102). She described her instructional goals as a "review of basic concepts" and helping students gain access to the content by "getting things modified." She thus pointed to another aspect of the law, which states that "in a pull-out replacement resource program, the general education curriculum and the instructional strategies may be modified based on the student's IEP" (N.J.A.C. 6A:14, 2015, p. 102). Although she did not explicate what "getting things modified" entails, she mentioned adjusting the pace of instruction, focusing on basic skills or concepts, and narrowing the content covered as the main strategies for meeting individual students' needs. In looking at how these courses are described by educators, it is clear that the rate and emphasis of instruction converge at standardized testing.

REDEFINING LRE

Although PC (or Replacement) classes are a more restrictive service delivery option than consultant[4] or co-teaching[5] models, schools and districts have generally perceived these classes as less restrictive than other self-contained classes. In the case of New Jersey, the distinction between a Replacement class and a self-contained class necessitated the state adding this new class configuration to the existing continuum of special education placements. Because students in these classes are accessing general education content as opposed to life skills or functional curriculum, and because they are taking state-level examinations, schools and districts view these placements as less restrictive than other self-contained classrooms.

Defining a PC class as less restrictive simply because the curriculum is more closely tied to the general education curriculum is a complete redefinition of inclusion and LRE—focusing on the *content* rather than the *context* of instruction. Still, this issue of place of instruction versus content of instruction is a question yet to be taken up by the field of inclusive special education in relation to these new courses.

Stated rationales provided for these courses often follow the same logic that has been utilized to justify placing students with disabilities in more restrictive and segregated settings. Researchers and educators supporting the efficacy of these settings often state that students will receive more individualized and intensive support with lower class sizes, and that they will experience fewer distractions if instructed in a more structured setting that better supports their overall understanding and acquisition of the content (Fuchs & Fuchs, 1995; Fuchs, Fuchs, & Stecker, 2010; Kauffman, Landrum, Mock, Sayeski, & Sayeski, 2005; McLeskey & Waldron, 2011). In essence, advocates of traditional special education argue that students who are perceived to be performing below grade level because of their identified disability must be segregated from their general education peers in order to effectively access the curriculum. Thus, it is assumed that some segregation is necessary to fully meet the individual needs of students with disabilities (Fuchs et al., 2010; McLeskey & Waldron, 2011).

The PC class is, by this logic, a viable solution for students who may need more support than has been typically provided within general education classrooms. Rather than argue that students should receive necessary supports in the general education classes where they would have full access to the curriculum taught by a content specialist, the impulse has been to create a new self-contained class to provide this access. As self-contained courses, however, PC classes reflect many of the same problematic attributes of other segregated settings.

In a multisite case study of six special education classrooms over a seven-year period, Causton-Theoharis, Theoharis, Orsati, and Cosier (2011) found that segregated settings provided neither appropriate nor meaningful instruction. In contrast to the teacher above, who described her curriculum as focused primarily on "the basics," the researchers in this study found that the instruction provided in these separate settings was neither substantially different nor superior to the instruction within the general education setting. A recent interview with a special education teacher from New York, who had experience teaching in both PC and inclusive settings, speaks to this issue of just what constitutes the curriculum in these segregated spaces. She maintained that the students in PC courses were not held to the same expectations as those in inclusive classes:

> Sometimes I feel like the work that we give our students in our PC classes is . . . I tend to compare my third period U.S. history class, which is with about 30 kids in there, and they're going through this content and it's like *boom, boom, boom*, to the [PC] . . . class that I have and it's like, OK well we just did this particular concept in third period. What makes us say that they're not capable of doing this exact same worksheet or having this exact same textbook and being able to read these things? Why is the expectation so different?

Another teacher similarly critiqued the content taught in a PC course:

> There isn't a lot of opportunity for critical thinking within the PC classroom. [In inclusive classes] it's much easier for students to understand, as well as see how their peers are thinking and developing thoughts, instead of simply relying on what the teacher wants them to do. I think the general exclusion of kids away from their peers gives them a stigma. . . . I don't think students are getting the type of education they would be having if they were placed within inclusion classrooms.

Within both of these excerpts there is a clear delineation between the instruction and expectations that take place within an inclusive general education classroom and a segregated PC placement. Both teachers described lowered expectations for students placed in PC

classes in comparison to those placed in general education classrooms. The first teacher primarily describes these expectations in relation to the pace of the curriculum ("*boom, boom, boom*"). She then continues by questioning why these students are not able to access the curriculum in the same way as their peers, asking: "Why is the expectation so different?" The second teacher describes the instruction in the PC class as providing less attention to critical thinking and more emphasis on teacher-centered instruction. Again, students with disabilities are positioned as needing a completely different type of instruction, one that is skill-focused and special education teacher directed.

In terms of the efficacy of PC classes in comparison to general education settings, stakeholders that we interviewed discussed the slower pace of instruction, rate of learning, and an increased and strict focus of these courses on curriculum that will be included on state tests. As researchers have demonstrated, a hallmark of instruction within these more restrictive and segregated settings is substantially lower expectations that result in considerably less access to general education content and curriculum, and relate to poorer academic outcomes (Biklen & Burke, 2006; Causton-Theoharis et al., 2011; Soukup, Wehmeyer, Bashinski, & Bovaird, 2007; Wehmeyer, Lattin, Lapp-Rincker, & Agran, 2003). Nonetheless, these courses continue to become normalized as a viable service option for students with disabilities in meeting the participation requirement in NCLB.

We have documented some of the reasons that states and districts have been drawn to creating PC courses for students with disabilities. Their rationales often reflect traditional special education beliefs about the efficacy of pullout instruction. As the pace at the secondary level becomes more aligned with standards, pre-written curriculum, and curriculum-matched texts, many educators feel increasing pressure to keep the pace of instruction rapid. Students who are unable to keep up, or who are viewed as needing a modified curriculum, are seen as impeding the success of the general education students, instead of a signal that the pace of instruction might be hindering many other learners. In addition to an adherence to traditional special education beliefs, we also found that some of the rationales for PC classes reflected misperceptions or misappropriations of more inclusive strategies, such as differentiated instruction.

MISUNDERSTANDING OF DIFFERENTIATED INSTRUCTION

Proponents of inclusion have long argued that students with disabilities must have access not only to the general education classroom, but also to the general education curriculum and high-quality instruction. Including students with disabilities in high-stakes testing and disaggregating their scores under NCLB provided further justification for ensuring that all students had access to the general education curriculum. To ensure curriculum access, teachers were encouraged to draw on promising inclusive practices, such as universal design for learning (Meyer, Rose, & Gordon, 2014), differentiated instruction, class-wide peer tutoring, and co-teaching (Cook & Friend, 1995; Feldman & Denti, 2004; Tomlinson, 2014; Udvari-Solner, 1995).

Many advocates of inclusion, like us, thought rather naively that including students with disabilities in high-stakes testing would remove any valid justification for excluding students with disabilities from general education classrooms. How could we hold students with disabilities accountable for the general education curriculum if they did not have access to the general education classroom? As critical special educators, however, we should have understood that power always recirculates and new forms of exclusion emerge as old forms fall out of favor (Ferri & Connor, 2006).

So, how did PC classes come to be seen as a valid approach to ensuring that students with disabilities had access to the general education curriculum, while excluding them from the general education classroom? Interestingly, in order to justify creating this special (and segregated) class, proponents often drew on discourses of differentiated instruction—a practice that was designed to help general education classroom teachers meet diverse learner strengths and needs in inclusive classrooms. Specifically, PC classes took an inclusive practice and instead of using it to differentiate instruction within an inclusive class, used it to justify the creation of an entirely new segregated special education class or track.

Sometimes referred to as pyramid planning, differentiated instruction involves layering the curriculum so that *all* students receive the most essential aspects of the curriculum, represented on the bottom tier. The next layer includes content and instructional goals that *most* students will be held accountable for, in addition to the bottom tier. This might reflect some additional goals or concepts that are appropriate for most of the students in the class. The very top of the pyramid represents material that is designed for just a *few* students. This layer could include an embedded IEP goal or perhaps a more advanced goal for students who require more challenge or who have mastered some of the content. Rather than differentiating instruction within the class, however, this model was borrowed and reconceptualized to justify separately tracked classes.

Instead of using flexible grouping to determine which students might need either more or less instruction and then differentiating and providing those modifications within a class, districts are misappropriating the language of differentiated instruction to justify providing a modified curriculum in a segregated class. As opposed to the original intent of differentiation, students who are perceived to require more modifications or differentiation in accessing general education content are placed within more restrictive tracks. Placement becomes driven by the perceived level of support, modification, and/or differentiation needs of the student, as opposed to flexibly providing supports within the general education classroom.

Figure 1 shows how PC classes take differentiated instruction, a strategy that is straight out of the inclusive practice playbook, but then use it to actually undermine inclusion and further track students by ability level. In so doing, PC classes also cement students into particular tracks, rather than considering that students, with and without disabilities, might have diverse strengths and needs that could be more flexibly accommodated in an inclusive classroom.

Figure 1. New Continuum of Services: Tracking Based on Perceived Ability to Pass State Tests
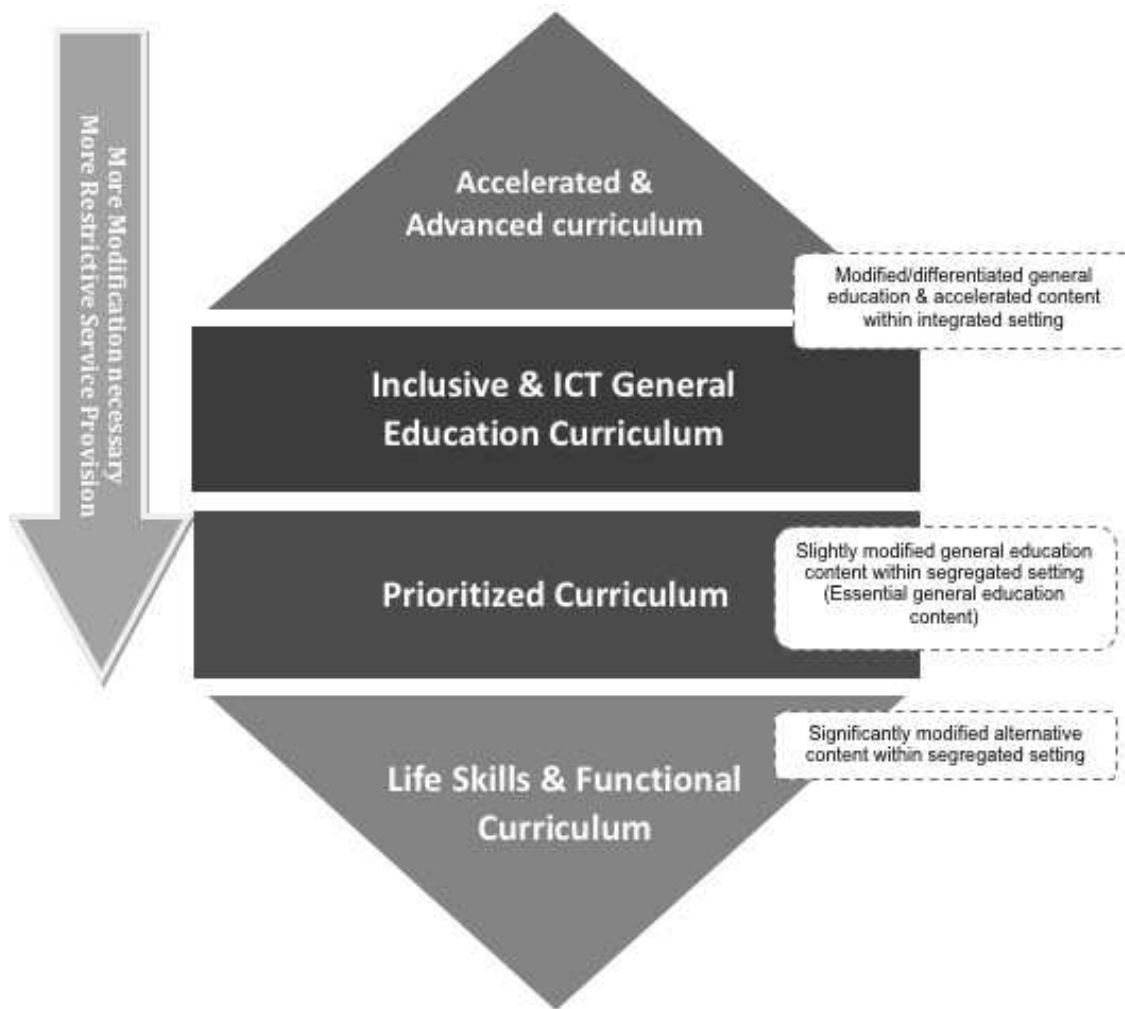
PRESSURES OF SBR AND GRADE-LEVEL EXPECTATIONS

At the secondary level, schools face increased pressure for students to receive regular high school credits and to pass exit exams that are aligned to the general education courses. As we spoke with various constituents who were involved with PC courses at the secondary level, we heard repeatedly that keeping up with grade-level standards was essential for entering and remaining in inclusive classes. One administrator explained that if students are too far behind grade level, it is not fair for them to be included because they would get lost in the shuffle of general education.

The increasingly rapid pace of the curriculum and the difficulty in adequately differentiating or meeting the needs of students who are too far behind grade-level is a central concern of teachers and administrators under SBR. Many teachers also experience pressure to quickly move through the standards-based curriculum by following commercially made texts and moving in a linear, step-by-step pace where minimal differentiation occurs. Many administrators and educators alike also fear that students with disabilities will bring down their scores—increasing the stakes of test scores, which are increasingly tied to both teacher and leader evaluations.

Trying to follow an ever-changing educational policy landscape also presented contradictions to administrators and educators that we spoke with. It was confusing to educators that as a part of NCLB, students with disabilities were allowed to receive accommodations on state exams, but not modifications. At the same time, a federal and a state-level policy stated that, "A child with a disability is not removed from education in age-appropriate regular classrooms solely because of needed modifications in the general education curriculum" (IDEIA, 2004, Sec. 300.116(e)). The conundrum of SBR is that students who are viewed as needing disability-related modifications are often understood as having conditional membership. Thus, their exclusion becomes justifiable under the pressures of SBR, despite assurances within IDEIA to the contrary.

IMPLICATIONS

The students who tend to populate PC courses are those with what are often considered mild or high-incidence disabilities, who must be included in state-level exams, but who are viewed as needing modification. Their membership is based on the rationale that they cannot keep pace with grade-level expectations and yet would not qualify for alternative assessments. Unfortunately, many of the most promising practices related to inclusion at the secondary level are removed along with the students who would likely benefit

from them. Moreover, because PC type courses are delivered in more restrictive and exclusionary settings, access to the general education classroom, high expectations, and socialization with same-age peers is blocked.

Overall, the proliferation of PC classes adds another placement on the LRE continuum that is more restrictive than settings that students would otherwise have the legal right to enter. The proliferation of such courses violates the lawful rights of students to a free appropriate public education (FAPE) in their LRE. Beyond the legal implications, we feel that inclusion is a moral right that is being denied to many students with disabilities who are funneled into PC classes.

CONCLUSION

As scholars of disability studies in education (DSE), we remain mindful of the ways that disability-related policies mitigate or intensify exclusion and oppression. A central tenant of DSE is "the idea that disability is a social phenomenon" (Taylor, 2006, xiii). In contrast to traditional medical- or deficit-model views of disability, we frame our understanding of disability around the fact that exclusion of disability often occurs because the problem of disability is seen as residing within the person, rather than a result of social, political, contextual, and environmental factors surrounding disability (Oliver, 1990). Because of our commitment to social justice, we promote inclusive educational opportunities for all students (Smith, 2010) and believe that educational policy should not overly rely on a medicalized or deficit-based perspective of disability. Educational policy should instead promote inclusive and equitable opportunities for all students.

The emergence and proliferation of the PC class, however, does not meet these goals of scholarship within DSE and, instead, adds another restrictive setting to the continuum of special education services. We feel that as the priorities and pressures of the SBR movement have mounted on local districts and schools, the decades of work and commitments toward more inclusive placements are becoming further jeopardized. The overemphasis on the high-stakes testing should be approached with skepticism, and contradictory policy mandates must be attended to. At the same time, we know of many schools that continue to maintain commitments to fully inclusive school settings. According to Hehir and Katzman (2012), administrators and educators view SBR policies either as obstacles hindering inclusion or as tools to promote full inclusion. The philosophy of educators and administrators regarding the efficacy of and justification for inclusive education tends to dictate how policy is enacted.

We therefore recommend that educators and administrators receive continual training on the benefits and methods of inclusive education instruction through a DSE perspective. When educators and administrators are fully committed to and knowledgeable about how to use inclusive strategies and practices, such as universal design for learning (Meyer, Rose, & Gordon, 2014) and differentiated instruction (Tomlinson, 2014) to meet the needs of diverse learners in one classroom, their default response to accountability pressures will not rely on creating new frameworks for exclusion.

As we explore ways to better teach all students and increase expectations for their success, we must be mindful of the means that we use to get to those ends. A lesson of PC classes is that we should be particularly mindful of neoliberal practices that reinvent segregation, while simultaneously espousing discourses of access. Requiring that students trade one type of access for another is a false choice and represents a move away from previous, incomplete efforts toward inclusion of students with disabilities as fully participating members of our school communities.

Notes

1. For the purpose of this paper SBR refers to reforms included in both NCLB legislation and subsequent Race to the Top grants, as well as ongoing discussions of the reauthorization of the Elementary and Secondary Education Act (ESEA). We use the term SBR to encompass the fluid, vast, and interconnected nature of the various elements of this reform movement.
2. We have documented PC-type courses in different states, although they are often referred to by other names. We are defining these classes as self-contained classrooms that use a modified general education curriculum, linked to subject areas most likely included in SBR assessments. Because the goals and functions of these various classes are all similar, for the purpose of this paper we will refer to them as PC classes.
3. The continuum of placements range from most restrictive (special school or segregated classroom) to least restrictive (general education classroom).
4. In a consultant model, the special educator provides direct or indirect support to students and teachers. In this model, students remain in the general education classroom and the teacher of record is the general education teacher.
5. In a co-teaching model, two teachers (one special education and one general education) teach collaboratively and both educators are teachers of record. These integrated classrooms tend to host anywhere from 10%–40% students with disabilities.

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