Disrupting the System: How Social Systems Perpetuate Educational Segregation of Students with Extensive Support Needs

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ABSTRACT:

Education teams continue to place students with extensive support needs (ESN) in segregated settings despite nearly 50 years of research culminating in the conclusion that students with ESN have better outcomes when educated in general education contexts. This article uses Bronfenbrenner's ecological systems theory to explain how social systems influence the beliefs, attitudes, and decisions made by education team members about the educational placement of students with ESN. This article describes: (a) Bronfenbrenner's ecological systems theory to explain how each social system influences decisions made about the educational placement of students with ESN; (b) the history of educational segregation of students with disabilities; (c) macrosystems of education team members and how they perpetuate segregated placement decisions of students with ESN; and (d) actions to disrupt the education system and segregated placement decisions.

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INTRODUCTION

The education system in the United States is structured so we believe that the decisions we make related to special education placement are based on core concepts such as the appropriateness of a student receiving instruction in general education classes, or the readiness of a student to be engaged with and make progress on the general curriculum or be engaged with classmates who do not have disabilities across general education environments. Such concepts imply that placement decisions are based on the learning needs of each individual student. This implication, however, is not supported when reviewing placement data for students with extensive support needs (ESN). Taub et al. (2017) describe students with ESN as those who need ongoing pervasive support, likely have a disability label of intellectual disability, multiple disabilities, deaf-blindness, or autism, and might take the alternate assessment. Students with ESN continue to be educated in segregated environments for the majority of their school day and have considerably less progress toward placements in general education contexts than students with all other disability labels (Morningstar et al., 2017; Williamson et al., 2020). The data suggest that placement decisions of students with ESN are based on factors other than the learning needs of each individual student. For example, according to federal data (U.S. Department of Education, 2021), tremendous differences exist between states in the percentage of students with intellectual disability who are included in general education classrooms for at least 80% of the school day. For example, Vermont includes the highest percentage (52.9%) of students with intellectual disability, followed by Kentucky (43.5%), and then Alabama (41%). Illinois includes the lowest percentage (3.8%) of students with intellectual disability, followed by Washington (6.2%), and then New Jersey and New Mexico (6.5 %).

Such inconsistencies in state data suggest that placement decisions are not based on students' individualized learning needs; rather, the data suggest placement decisions are based on other factors. Researchers have found that several variables are predictors of placement decisions for students with disabilities, including (a) disability label (Morningstar et al., 2017); (b) communicative competence (Kleinert et al., 2015; Kleinert 2020); (c) race and ethnicity (Connor et al., 2019); and (d) geographic location (White et al., 2019). That is, students with some particular disability label (i.e., intellectual disability, multiple disabilities), method of communication (i.e., augmentative or alternative communication), race and eth-

nicity (i.e., Black, Latinx), and geographic location (i.e., urban) are more likely to be placed in segregated educational environments. In comparison, students with other particular disability labels (i.e., specific learning disability), methods of communication (i.e., verbal speech), race and ethnicity (i.e., white), and geographic location (i.e., rural) are more likely to be placed in general education environments. In addition, researchers have argued that other variables such as greater state and district wealth, more financial resources, and higher average per-student expenditure are predictors of placement decisions. However, Westling (2019) found there was a slight negative relationship between higher median household income and placements in general education environments for all students with disabilities, students with intellectual disabilities, and students with emotional disturbance. In addition, Westling (2019) found there was a slight negative relationship between a state's percentage of adults with college degrees and placements in general education settings. He argues that it is not accurate to assume that better state resources for educational services are related to the placement of students with disabilities in general education environments. Jackson et al. (2022) recently explored the resources of a national sample of districts serving students with ESN. They found that as districts offered more segregated placements they had incremental increases in district annual budgets and per special education student expenditures, contradicting the assumption that educating students in general education contexts is more expensive than in segregated settings.

Literature from the past 50 years argues that students with ESN should be educated with their peers in inclusive environments (Brown et al., 1976; Brown et al., 1973), culminating in research that suggests that services in inclusive environments lead to more positive outcomes across all domains. For instance, when educated in general education classes, students with ESN have greater academic achievement (Gee et al., 2020), social outcomes (Jameson et al., 2022), post-school outcomes (McConnell et al., 2021), and growth in communication (Gee et al., 2020). In contrast, there are no experimental studies that document better outcomes for students with ESN when they receive services in segregated environments (e.g., self-contained classes; Gee et al., 2020). Yet students with ESN continue to be educated in segregated environments for the majority of their school day (Brock 2018; Morningstar et al., 2017).

A decades-old question persists: If research demonstrates that serving students with ESN in general education environments leads to better outcomes across all do-

mains, why do the vast majority continue to be placed in segregated environments for the majority of their school day? To address this question, we will use Bronfenbrenner's ecological systems theory as a framework to explain how social systems influence the beliefs and decisions made by each education team member about the educational placement of students with ESN. We will describe (a) Bronfenbrenner's ecological systems theory, (b) the history of educational segregation of students with disabilities, (c) macrosystems of education team members, and (d) actions to disrupt the education system and segregated placement decisions.

ECOLOGICAL SYSTEMS THEORY

Bronfenbrenner's ecological systems theory ties human development to the interactions an individual has with other humans and their physical surroundings, rather than biological or behavioral factors (1994). Using Bronfenbrenner's ecological systems theory to conceptualize school change, Ruppar and her colleagues posited that micro-, meso-, exo-, macro-, and chronosystems are a way to understand inclusive education. Ecological sys-

tems theory explains that an individual is situated within the first four social systems which are nested, with that individual's development being influenced by the interactions they have within these (Bronfenbrenner, 1994; 1977). The fifth system, the chronosystem, is described as the events that occur across a person's life course and historical time that influence their development (Bronfenbrenner, 1994). In the following section, we will describe the four nested social systems and the chronosystem, and explain how each system influences decisions made about the educational placement of students with ESN (see Figure 1 for a visual representation).

Nested Systems

The first of these is the microsystem, which Bronfenbrenner describes as the relationship between a person and the immediate environments where they have face-to-face interactions with others. Environments are places (e.g., classroom, home) with specific physical characteristics where a person engages in specific activities in specific roles (e.g., student, teacher, parent) for specific time periods (Bronfenbrenner, 1977). The microsystem for any student, therefore, is the interactions they have

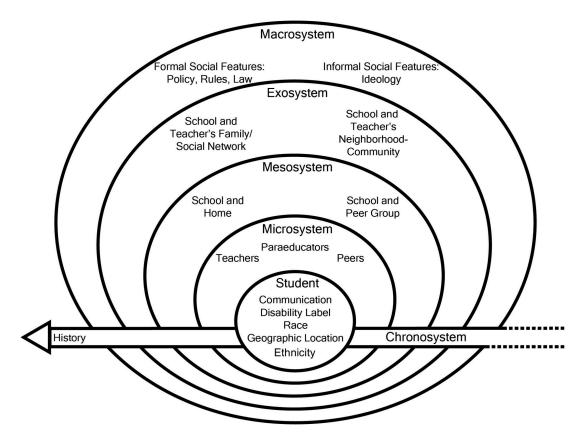


Fig. 1. Ecological Systems Model

Note. Visual representation of the relations and processes within nested social systems that influence the educational placement of each student with ESN across time.

www.internationalsped.com 60

with many individuals within their school environment, including peers with and without disabilities, special and general educators, related service providers, and paraeducators (Ruppar et al., 2017).

The second nested social system is the mesosystem, which includes the processes and relations occurring between two or more microsystems in which a person is involved. It consists of relations among multiple interacting microsystems, such as the relations between school and home, or home and work (Bronfenbrenner, 1994). The mesosystem for each student with ESN primarily includes the relations among the school, home, and peer microsystems. For example, each student's mesosystem consists of many microsystems from school (e.g., teachers, related service providers), home (e.g., parents, siblings), and peer groups (e.g., neighbors, cousins, schoolmates) in which the student is directly involved.

The third nested social system is the exosystem which also consists of the processes and relations between two or more microsystems, however at least one of those microsystems does not involve the individual. The processes of these microsystems indirectly impact the individual and the microsystems in which they are involved (Bronfenbrenner, 1994). For example, each education team member's education, workplaces, family social networks, and neighborhood-community contexts are microsystems that impact their perceptions, opinions, and ideals about disability, but these microsystems do not directly involve the student with ESN (Bronfenbrenner, 1994). Each team member cannot be separated from the influence of their own microsystems which influences their perceptions, opinions, and ideals when discussing and making decisions about the educational placement, curriculum content, and educational supports provided for a student with ESN (Ruppar et al., 2017). We contend that these decisions impact a student's development as they dictate the degree to which the student has opportunities to learn academic content and embedded essential skills.

Bronfenbrenner (1977) describes the fourth nested social system, a macrosystem, as the overarching institutional patterns of a culture or subculture. As such, the macrosystem provides the "blueprint" for both cultures and subcultures (Bronfenbrenner 1994, 1977). He describes culture as a group of people with common belief systems, bodies of knowledge, material resources, customs, lifestyles, opportunity structures, hazards, and life course options (Bronfenbrenner 1993, 1994). Likewise, he describes subculture as a group of people within a culture who share a common broader social structure, such

as social class, race, ethnicity, disability, religion, or geographic location (e.g., the same neighborhood, community, or region; Bronfenbrenner, 1994). The overarching institutional patterns of a culture or subculture would include the economic, social, educational, and political systems that influence each person's micro-, meso-, and exosystems nested within the macrosystem (Bronfenbrenner, 1977). What a student with ESN experiences within the disability subculture, therefore, is influenced by every aspect of their own macrosystem, including the perceptions of each education team member derived from their own macrosystems.

Each macrosystem exists in both explicit forms (e.g., formal social features such as rules and law) and implicit forms (e.g., informal social features such as ideologies) that are exposed through everyday decisions and actions (Bronfenbrenner, 1977). These social features bear information and ideology that give meaning and direction to agencies (e.g., government), social networks (e.g., families), roles (e.g., teacher, parent), and activities, and the relationship among them (Bronfenbrenner, 1977). We maintain that these social features blend together and impact the decisions made by education team members, which expose their personal ideology about ESN (e.g., student expectations), the role of education for students with ESN, and appropriate services for students with ESN. It is critical, therefore, to identify the social features of each macrosystem that affect conditions, processes, and interactions experienced by education team members within their own microsystems (Bronfenbrenner, 1994) that influence their ideology and beliefs about students with ESN and their educational services.

In 1993 Bronfenbrenner discussed how human development differs significantly between each person's macrosystems (p. 317), which clarifies his earlier work (1977) when he stated:

"What place or priority children and those responsible for their care have in such macrosystems is of special importance in determining how a child and his or her caretakers are treated and interact with each other in different types of settings" (p. 515).

While this is relevant for all students with disabilities, we believe it is particularly important to each student with ESN because decisions about their educational placement and services are made by their education team members, and these decisions have led to a high probability of a student with ESN being segregated from general education contexts, peers, content, and experiences (Brock 2018; Morningstar et al., 2017). The macrosystem of each member of a student's education team,

therefore, impacts team members' perceptions of effective services and placement decisions.

Chronosystem

The chronosystem is the final social system that extends beyond the environment to the passage of time (Bronfenbrenner, 1994). Bronfenbrenner (1994) describes the chronosystem as the changes and continuities that a person experiences and that occur in the environment in which they live, both during their lifetime and across historical time. Changes in schools or levels (e.g., elementary to middle school), for example, impact the educational placement of a student with ESN and provides opportunities for education teams to assess the student's access to the general education curriculum (Ruppar et al., 2017). We assert that even more influential are the significant historical changes and continuities that impact educational placement decisions of all students with ESN in the United States today.

When an education team makes a placement decision that segregates a student with ESN from general education contexts, they are making decisions that greatly limit that student's opportunities to learn (Taub et al., 2017). In turn, this considerably impacts the student's lifelong trajectory (Brock, 2018; Morningstar et al., 2017). If we want to improve a student's long-term outcomes, therefore, we must consider the chronosystem as we attempt to influence the macrosystems of their education team members and the decisions made about education placement. This would require disrupting the existing social systems.

HISTORY OF SEGREGATION OF STUDENTS WITH DISABILITIES

Historical events have shaped the education system in which we currently function, which includes students with ESN being segregated from students who do not have disabilities. They also have resulted in an educational system ideology that students with ESN should continue to receive services in segregated educational contexts. We argue that this ableist systemic ideology influences the beliefs of education team members and the decisions they make related to the educational placement of each student with ESN. Understanding historical changes and continuities in the chronosystem is critical to disrupting the systems that perpetuate the educational segregation of students with ESN today.

Richardson (1994) described three separate types of schools in the public education system that existed in the United States during the 19th and early 20th centuries. First, "common schools" were intended to serve all children in a geographic area. Second, "delinquent schools" were developed for students who were expelled or excluded from the common schools and operated as a means to segregate students of color. Third, "special schools" were intended for students with mental and physical disabilities because they were considered to be uneducable, but were required to attend a special school in a state asylum or institution for care, protection, and instruction. The government imposed compulsory education and educational standards to only the common schools. Professionals who worked in either the delinquent or special schools were not required to implement the government policies or curriculum from the common schools; rather, they operated with no mandated curriculum or legal consequences for their services. Richardson argued that the decisions to apply compulsory education and educational standards to only the common schools cultivated the controversy about educational policy and practice that remains today.

In 1975 federal policy changed and began to include students with ESN in compulsory education and, when appropriate, in common schools. Although the intent of the legislation might have been for students with disabilities to be integrated into common schools, Richardson (1994) argues that the policy's language allowed for the continuation of the three types of schools which were systematically designed to separate students. At that time, it was unknown how to provide educational services to students with ESN (Jackson et al., 2009). Special educators and families had to decide what comprised an appropriate education, without being required to use the common school's curriculum or instruction (Jackson et al., 2009). In the past 45 years, there have been numerous approaches used to provide services to students with ESN with variations in the curriculum content, the place of instruction, and the instructional practices (Jackson et al., 2009).

Today, federal policy remains open for individual and collective interpretation. Policy language requires districts to have a continuum of placements; however, it also states that students should be removed to separate settings only "when the *nature or severity of their disability* is such that they *cannot* receive a free and *appropriate* public education in the *regular classroom* with *supplementary aids and services*" (IDEA, 2004).

Despite numerous approaches used and policies enacted, there has been virtually no change in educational placements for students with ESN. Brock (2018) analyzed federal educational placement data for students

with intellectual disability from 1976 to 2014. He found minimal progress toward educating students in general education classrooms was made between 1990 and 2010, additionally, he found that progress declined between 2010 (17.9%) and 2014 (16.9%). These findings are consistent with other studies that analyzed educational placement trends. For example, Williamson et al. (2020) found that between 1990 and 2015 general education placements for students with intellectual disability increased by only 34% nationally, compared to an increase of 171% for students with learning disabilities and an increase of 101% for students with emotional disturbance. In an analysis of placement trends between 2000 and 2014, Morningstar et al. (2017) also found that students with ESN had considerably less progress toward placements in general education contexts than students with all other disability labels.

Federal policy suggests that education team members must determine whether each student can receive an appropriate education in general education contexts, based on their individualized learning needs (IDEA, 2004). Data suggest, however, that educational placement decisions of students with ESN are not based on individualized learning needs; rather, researchers have found several other variables that are predictors of placement decisions for students with disabilities, including those with ESN. Ruppar et al. (2017) argue that each education team member possesses underlying assumptions about a student's identities (e.g., disability label, communicative competence, race, ethnicity, geographic location) which collectively become predictors of placement decisions made by team members. We contend that these factors impact education team members' perceptions of the student and assumptions about their abilities to succeed in various education placements. Students' identities interact with the current ableist education systems and structures and that interaction perpetuates segregated placements. When considering this argument and Bronfenbrenner's ecological systems theory that has each education team member possessing biases and assumptions about a student's identities, as molded by their macrosystem, which ultimately become predictors of a student's placement.

MACROSYSTEMS OF EDUCATION TEAM MEMBERS

The biases and assumptions that team members hold about students with ESN are molded by each member's macrosystem, which exists in both explicit forms (e.g.,

formal social features such as law) and implicit forms (e.g., informal social features such as ideologies). We believe that the social features of each member's macrosystem blend together and influence the placement decisions they make and, in turn, expose their personal ideology about students with ESN and appropriate services for them.

While federal policy mandates that education team members assess each student's individual learning needs, we think this cannot be accomplished with members' biases and assumptions about a student's identities influencing that student's education. For instance, Mayton et al. (2014) found that many district personnel assume that students with ESN can only receive individualized instruction in segregated environments. During observations of 116 students with ESN across the United States, Zagona et al. (2022) did not find evidence of practices meant to address students' needs (e.g., greater access to individualized supports) that commonly are used as a rationale for maintaining a student with disabilities in segregated placements. For example, the authors found that in resource, self-contained, and separate school classrooms educators were significantly more likely to be focused on other adults, rather than being focused on students, when compared to educators in general education classrooms. Further, educators in self-contained and separate school classrooms were significantly more likely to be providing no instruction to students, compared to educators in general education classrooms (Zagona et al., 2022).

Gee et al. (2020) analyzed the instructional progress and outcomes of 15 pairs of students with ESN in one district who were matched on 12 characteristics (e.g., disability labels, eligibility for alternate assessment, communication, literacy, and numeracy levels) by comparing their first and most recent individualized education programs (IEPs). One student in each pair was educated in the general education classroom for at least 80% of their school day and the other student in the pair was educated in a segregated special education classroom. The authors found that 100% of students in general education classes made progress in communication and literacy, and 93% made progress in numeracy. In comparison, only 20% of the students in segregated classrooms with whom they were matched made progress in communication, 27% made progress in literacy, and 26% made progress in numeracy. Gee et al. (2020) also observed each student during a typical instructional day and found that students educated in general education classrooms were engaged for 96% of observations, whereas students in

segregated classrooms were engaged for 62% of observations. We think it is important to recognize that two different education teams, with each member influenced by their own macrosystem, chose to place students with 12 matching characteristics in very different educational settings even though the district had a strict protocol for making placement decisions; thus, it was neither the students' characteristics nor the district's policies that were different. Rather, only the biases and assumptions of the education team members varied.

To explore how education team members make placement decisions, Kurth et al. (2019) did a content analysis of least restrictive environment statements in the IEPs of 88 students with ESN in various types of LRE placement to determine what factors educational teams considered when making placement decisions. A justification for segregation was present in nearly all of the IEPs and most often was related to the education team members' perceptions of the inability of students with ESN to benefit from services in general education contexts and on general education content. For instance, justifications included the need for a different curriculum, instruction, and supports. In addition, the authors found that the section for a rationale for the least restrictive environment placement decision on 62 IEPs was either blank, not even present, not measurable, or not individualized (e.g., a template with yes/no questions).

Allowing teams to consider a variety of educational placements based on student identities perpetuates the pre-existing continuum of common, delinquent, and special schools (Ryndak et al., 2014). This continuum is problematic because education team members usually interpret it to mean that a student with disabilities must prove they are ready to be moved from special schools and special classes and be included in common (i.e., general education) classes (Burnette, 2022; Ryndak et al., 2014). When team members decide that a segregated placement is appropriate for a student with ESN, they ignite the trajectory of segregation that will likely continue throughout the student's entire school career (Morningstar et al., 2017; Williamson et al., 2020); that is, once a student is placed in a segregated placement they never return to common (i.e., general education) placements.

Placement decisions are complicated further by teacher preparation programs that lack the vision of a wide range of educational opportunities for students with ESN (Ruppar et al., 2022). Ruppar et al. (2022) argue that stereotypes continue to exist in the way we treat special educators as saints and proliferate deficit-minded expectations for students with ESN. We argue that these

mindsets reinforce the idea that not only is segregation necessary, but there must be a segregated setting already in existence in case a student with disabilities needs it. We believe that the subjective assessment of student readiness, appropriate education, and necessary segregation directs the attention of education team members toward a student's placement, rather than toward the supports and services that the student needs to be a member of a general education class. In turn, once a student is placed in a segregated environment districts, schools, and education teams focus their efforts on implementing alternative curriculum "designed" for students with ESN that "aligns with" grade-appropriate general education standards as required by law, instead of making the general education curriculum accessible to them. Unfortunately, we know that research on such specially-designed curricula does not support this premise (Taub et al., 2020).

To disrupt the ceaseless educational segregation of students with ESN, education team members must acknowledge the influence that their macrosystem has on their biases around disability, and its influence on their thought and decision-making processes. We insist intentional steps be taken at federal, state, district, and school levels, as well as with education team members and individuals, to combat ableism embedded within the social systems that maintain the segregation of students with ESN.

ACTIONS TO DISRUPT THE EDUCATION SYSTEM AND SEGREGATED PLACEMENT DECISIONS

Federal and state policies influence the biases and assumptions that team members hold regarding the education of students with ESN and, in turn, those biases and assumptions impact the educational placement decisions they make. We assert that policy must be reauthorized to remove team member subjectivity from placement decisions (e.g., language such as maximum extent appropriate) and instead mandate that all students be included in general education contexts with supplementary aids and services. Policy must be explicit in the intention to, and accountability for, moving students with disabilities into general education contexts. States should be required to have certain percentages of students with disabilities included in general education contexts by certain dates, increasing over a set period of time (i.e., 5 years) until all students are educated in general education contexts. There must be an expectation that this policy is indeed a requirement and states that do not abide will be held accountable. In turn, segregated settings would not be the de facto placement for students with certain disability labels or other identities (Ruppar et al., 2017). We maintain that policy instead should focus on structural elements of services such as the supports, instruction, and interventions that students with ESN need to be successful in general education environments (Sailor et al., 2018).

Multi-tiered system of support (MTSS) frameworks are schoolwide approaches that shift the focus of student support away from physical location to structural elements of services and, in turn, create an infrastructure with resources and services available for all students, including those with ESN (Sailor et al., 2018). The MTSS framework delineates the use of continuous performance measures to select student interventions; integrate social, behavioral, and academic interventions; foster collaboration among educators; and use universal design for learning principles to include all students (Sailor et al., 2018). We believe integrating an MTSS framework supports the decrease of subjective interpretations of policy language such as readiness and appropriateness from team members who maintain underlying biases and assumptions about students with ESN.

A shift in school-wide cultural beliefs must coincide with the implementation of educational frameworks that focus on structural elements of services. Lazarus et al. (2019) discussed that school reform projects and school-level professional development fail as a result of school culture. They argue that all students receiving meaningful instruction and support in general education classes must become a school norm. Professional development, therefore, should focus on shifting school norms toward instructional improvement and leadership development to promote a change in school culture. In turn, school conditions that influence the success of systems change, such as educators' beliefs in their effectiveness and the norms of leadership, also will shift. Professional development that is intensive and long-term, and includes coaching, can cultivate a district-wide culture of improvement that sustains systemic change.

Fostering sustainable, systemic change, including the implementation of MTSS, requires intentional action at the education team, school, district, and state levels (Lazarus et al., 2019; Ryndak et al., 2007). The research on educational systems change supports an implementation science approach that provides theoretical and practical guidance for change efforts. In this regard, implementation science is the study of features and conditions that result in sustainable system-wide changes that in-

corporate the effective implementation of evidence-based programs and practices in general education contexts (Lazarus et al., 2019). Implementation science facilitates the spread of new ideas and evidence-based practices (Nilsen, 2015), which can result in students with ESN receiving supports and services that meet their learning needs in general education classes (Ryndak et al., 2007). We believe that emerging knowledge about implementation science will give education team members and educational leaders hope for lasting school reform. The use of effective systemic change efforts results in modifications of the behavior of educators and administrators, creates conditions to facilitate these changes, creates processes to maintain and improve changes in conditions and behavior, and leads to better student outcomes (Fixsen et al., 2005). The result of such change efforts will be evident in three specific implementation outcomes: changes in behaviors, changes in structures, and changes in relationships (Fixsen et al., 2005). Transformation of personal beliefs will vary by education team members and take considerable time because of the continued influence of their macrosystems, which maintain social features that will continue to influence their beliefs and attitudes (e.g., policy). In an analysis of research on the practical application of Bronfenbrenner's ecological theory, Tudge et al. (2009) clarified that Bronfenbrenner (1989) reflected on his theory and concluded that people also play a role in their own development and decision-making. This leads to the conclusion that education team members can choose to ignore and make decisions that oppose the social features in their macrosystem that maintain the educational segregation of students with ESN.

In their review of the literature, Lazarus et al. (2019) found six components that have led to effective and sustainable systems change toward general education placements of students with ESN, and embedded the use of evidence-based practices. First, representatives from all stakeholder groups (i.e., parents, educators, administration, and related service providers) must develop a school-wide vision for desired services, and compare school policies, procedures, and frameworks to that vision. Professional development and technical assistance must align with that school-wide vision to increase school ownership and consistency in practices. Second, representatives must develop a common understanding of the amount of effort and time required for the change process, as well as a commitment to that change process. Third, there must be established structures of communication across and within the state, district, school, and education team levels. These structures allow all levels

to be informed about and support the change effort. Fourth, there must be coordinated efforts across multiple levels to ensure evidence-based practices are being implemented with fidelity. Fifth, programs must seek the input of trusted external observers who can provide objective feedback on the services being provided compared to the desired services. Sixth, data must be collected on variables to assess progress toward the desired practice and the impact of those practices on student outcomes. Data-driven decisions must be made to continuously improve students' services.

CONCLUSION

The inuring narrative of education in the United States is marked by habitual segregation based on student identity. Social features in the macrosystem have perpetuated this educational segregation for students with ESN since the inauguration of mandatory special education services. We maintain that large-scale educational change is needed as a beginning remedy to address ingrained inequities embedded within the current educational system. Thoughtful reflection and intentional action are needed at federal, state, district, school, and education team levels if individuals are to disrupt the social systems, the educational system, and the segregation of students with ESN.

We believe that shifting the framework of special education away from physical location to structural elements of services and instruction will decrease the subjectivity of individuals who make decisions about the educational placement of students with ESN, regardless of the social features embedded within their macrosystem. Furthermore, this shift could mitigate biases and assumptions made by decision-makers about student identities and, thus, increase the likelihood that students with ESN will be placed in general education contexts with their grade-level peers. We assert it is well past the time to write a new chapter in the narrative of education where all students receive inclusive and equitable learning opportunities.

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