

# *A Comparative Analysis of Inclusive Education Policies in China and the United States*

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**Abstract:** Inclusive education has become popular to ensure equal educational opportunities for students with specific educational requirements or disabilities (SEND). This research paper compares the inclusive education policies in China and the United States with a comprehensive review of relevant literature, examining the conceptual framework, legal framework, and practices. This paper found that China adopts a pragmatic model to practice its policies while the U.S. uses an idealistic model. Furthermore, both countries are working towards attaining UNESCO's definition of inclusive education, facing conflict with neo-liberal education policies. Building on these findings, policymakers and stakeholders in both countries can draw insights to emphasize their country's high priority and foster greater inclusion in education accordingly.

**Keywords:** Inclusive education, education policy, comparative analysis, China, the United States

## 1. Introduction

Inclusive education is a fundamental component of education policy implemented by governments globally. Presently, a broad international consensus exists regarding the desirability of inclusion as an objective [1]. Nations have journeyed through legislating, policing, and practising inclusive education guided by their unique history, cultures, and socio-economic development [2].

This study is founded upon prior theories and research on inclusive education in China and the U.S. and some comparative articles on advancing inclusive education in both countries. However, a comparison of inclusive education policies between China and the U.S., detailed in their conceptual framework, legal framework, specific practices, and challenges, is lacking.

Below are two research questions:

R.Q. 1: What are the practices of inclusive education policies in China and the U.S.?

R.Q. 2: What are the challenges of inclusive education policies in China and the U.S.?

The research methodology involved a comprehensive review of relevant literature and government documents about inclusive education policies in China and the U.S. The findings from this research can inform policymakers, educators, and stakeholders in both China and the U.S. about the future development trends of their respective inclusive education policies. Additionally, the study can offer some policy recommendations to enhance their inclusive education systems.

## **2. Research foundations and relevant research on inclusive education policies in China and the United States**

### **2.1. Conceptual framework**

The establishment of Western inclusive education has a profound cultural origin and conceptual foundation. It is based on the values of the pursuit of equality and freedom since the Western Renaissance and is strongly influenced by idealism. The concept of integration originated from the slogan “Separation is inequality” in the American civil rights movement since the 1950s. This movement encouraged the widespread diffusion of the concept of democratization of education and accelerated the advancement of Western special education towards inclusive education [3].

In China, the concept of inclusive education is influenced by Confucian educational philosophy and aligns with the principles of socialism. The concept was articulated as a *da tong* society, denoting a state of collective harmony and unity. This benevolent society that provides care and education for individuals with disabilities has exerted a significant influence throughout history. The Confucian perspective on handicap exerts a constructive impact by fostering public empathy and benevolence and prompting government support in terms of welfare and education [4].

### **2.2. Legislation and legal framework**

#### **2.2.1. Legislation development in China**

Since the 1950s, the state has asserted that children with disabilities are entitled to education and proposed the creation of various educational organization formats, establishing the foundation for inclusive education. The 1985 “Decision of the Central Committee of the Communist Party of China on Education System Reform” mentioned developing early childhood education for children with SEND while implementing nine-year compulsory education. This policy is designed to mobilize education reform and provide development space for inclusive education. In 1988, the Five-Year Work Program for the Disabled in China and the idea of *Sui ban jiu du* (Learning in Regular Classrooms) was released. LRC was formally presented for the first time. In 1994, the MOE produced Trial Measures on the Implication of LRC for Children and Youth with Disabilities to administer and distribute LRC programmes nationwide, drawing on past experiences [1].

In 2014, the Special Education Improvement Act (SEIA) was implemented to promote the advancement of mandatory education for youngsters with SEND. SEIA mentioned “promoting inclusive education in all areas so that every child with disabilities has access to an appropriate education.” The term “inclusive education” has been introduced at the national policy level for the first time [5]. In 2017, Regulations on Education for Individuals with Disabilities asserted the need to “actively promote inclusive education” [6]. In 2021, the State Council advanced the Action Plan for Promoting Special Education during the Fourteenth Five-Year Plan Period and endorsed the goal of the “comprehensive promotion of inclusive education”. Overall, these regulations mandated developing a comprehensive, inclusive education system and expanding the LRC to ensure greater inclusivity.

#### **2.2.2. Representative legislation in the U.S.**

The Education for All Handicapped Children Act (EAHCA) 1974 was the inaugural federal legislation explicitly addressing providing free appropriate public education (FAPE) to students with disabilities. This legislation significantly augmented the population of students with impairments who get an education in mainstream classrooms. The Education of the Handicapped Act (EHA) (1975)

was the initial modification of EAHCA, and it served as the inaugural federal law requiring mandatory education for all students with impairments [6].

In 1990, inclusive education saw significant advancements in renaming and refining the EHA into the Individuals with Disabilities Education Act (IDEA). This revised legislation ensured that every child with disabilities would receive a FAPE in the least restrictive environment (LRE). The most recent renewal of IDEA was the Individuals with Disabilities Education Improvement Act (IDEIA) in 2004. IDEIA is a crucial legislation that ensures the objective of inclusive education. It requires educational entities at the local, state, federal, and other levels to establish policies and procedures that uphold the mission of providing education in the LRE [7-9].

### **2.3. Practices and approaches**

#### **2.3.1. Sui ban jiu du in China**

Sui ban jiu du, also known as Learning in Regular Classrooms, is an educational approach that enables children with disabilities to participate in general education alongside their non-disabled counterparts [10]. The primary aim of LRC was to enhance the accessibility of compulsory education for a more significant number of students with disabilities. Nowadays, the state is expanding the scope of objects of LRC to improve the education quality and ensure all students can be adapted to general school.

There are two primary LRC models in mainland China: the itinerant teacher and resource classroom models. The first one is typically administered by special education commissioners employed by local education bureaus or prominent teachers in special schools. The main job is to guide the regular class work of each school. The second method is commonly utilized in highly developed regions such as Beijing. Students will receive different content and degrees of individual guidance in the resource classroom depending on their specific situation in regular classes, mainly cultural knowledge guidance [11].

#### **2.3.2. Inclusive education practices in the U.S.**

An individualized education program (IEP) is a yearly amended written statement created and reviewed for each child with a disability. It encompasses a student's present level of performance, yearly goal, special education, associated support services, and participation in the general education environment [12]. IEPs facilitate the inclusion and academic progress of children with disabilities within the general educational curriculum while addressing their specific educational requirements resulting from their impairment.

Universal Design for Learning (UDL) is a framework of concepts and strategies that may be applied in the classroom to create accessible educational material that can remove barriers in the curriculum [13]. Through planning, educators can address the variation in learners' ability to access and comprehend information, engage with content and instruction, and express what they know.

The collaborative team approach in the classroom is a model to address the educational requirements of every student [12]. In the Supportive Teaching Model, general education teachers are accountable for the substance of the material, whereas the special educator has responsibility for the modifications. The Co-teaching or Team-teaching Model involves collaborative planning, instruction, and assessment of performance and evaluations. The Complementary Model uses the special educator to integrate techniques and strategies into the regular education curriculum [13].

## **2.4. Challenges within the development**

### **2.4.1. Common challenges**

Although inclusive education aims to include all students, China and the U.S. have prioritized the integration of students with special education needs into regular education environments despite attempts to expand this initiative [14].

Neo-liberal educational policies have been implicated in the increasing transfer of students from regular schools to special schools. Schools are progressively prioritizing the attainment of exceptional standards, aiming to earn high scores in examinations, secure prestigious positions at renowned colleges, and foster the exceptional abilities of the most gifted students. Schools are pressured to depend on restricted facets of education, such as scholastic accomplishments in specific disciplines, because of an obsession with international educational rankings. Children with SEND are especially prone to being stigmatized, marginalized, and disadvantaged due to their perceived lack of promise and competitiveness in academic performance and economic contribution [15].

### **2.4.2. Challenges in China**

The most significant challenge is to complete particular policies and legal provisions. China has developed a set of legislation and regulations but no specific policies or regulations for inclusive education. The problem with the absence of specific policies is the limited availability of resources and funding. This can pose barriers to providing necessary support, facilities, and teaching resources to students SEND. On the other hand, the LRC's current practices have faced recurrent criticism for solely focusing on the physical inclusion of children in mainstream settings [15]. The quality of teaching and learning experience for students with SEND is hard to guarantee, especially in less-developed and rural areas. In order to tackle all these challenges, the top priority for China is to tackle them at the policy level.

### **2.4.3. Challenges in the U.S.**

Teacher attitudes towards inclusive education and its practices have been a subject of debate and complexity. Certain teachers may hold unfavourable attitudes towards children with emotional and behavioural challenges, perceiving them as 'bad, mad, and sad'. Pessimistic perspectives on disabilities can prompt students with SEND to misuse sanctions for uncompliant behaviour, which could further marginalize and stigmatize them in class [15]. Moreover, although attitudes can be readily "unlearned" or modified, changing fundamental value systems is far more complex [16]. The root of teachers' attitudes is the social stigma about disabilities that lasts, which needs to be eliminated by profound policies and values for a long time.

## **3. Discussion on the research findings**

### **3.1. Summary of key findings**

The policy model for promoting inclusive education in China and the U.S. is similar and provides national education legislation that aims to construct and finalize the legal system of education equality. However, due to the different contexts in these two countries, the specific practices differ in many aspects. This comparative analysis found that China adopts a pragmatic model while the U.S. uses an ideal model.

Sui ban jiu du is a pragmatic model of inclusive education. The initial purpose was mainly to provide children with equal education opportunities. However, it considers how to enable children with disabilities to enrol in ordinary schools in local vicinities to achieve compulsory education

rapidly for economic purposes at the practice level. Inclusive education in the U.S. is rooted in Western social concepts such as individual freedom and social equality, which gives it an idealistic pattern. The current state of education has evolved to prioritize equal access to education and social integration of pupils while partly overlooking their intellectual progress [17].

However, the vision of inclusive education defined by UNESCO is not yet completed in both countries, regardless of their practice model.

### **3.2. Limitations of the comparative analysis**

The differences between inclusive education policies in China and the U.S. are caused by the different interpretations of "inclusive" and different national conditions. In order to do a thorough comparison, there needs to be further analysis of the understanding and demonstration of inclusive education in these two countries. A policy text analysis can capture the detailed differences between policies regarding objectives, measures, and implementation. It also needs to fully consider the multi-dimension of political, economic, and sociocultural factors to understand the different contexts behind the policies better.

This analysis compares only salient policies and practices at the national level. Different policies and regulations in individual provinces or states, cities, and regions are not included, which can overlook some different regulations and practices. In China, the degree of Sui ban jiu du varies significantly between regions with different economic statuses. Additionally, the arrangement of inclusive education is highly influenced by the extent of individual state's and local districts' support in the U.S. Therefore, a systematic comparative analysis of policy documents and practices at different levels is in demand.

### **3.3. Recommendations**

The typical conflict with neo-liberal education policies emphasizes redefining and expanding the scope of ideal skills, knowledge, and qualities in education. This ensures that schools do not marginalize or exclude students with SEND due to their apprehension of becoming less competitive and appealing in the consumer market.

For China, the first thing is to complete systematic legislation. It is essential to provide specific laws and policies, identify the relevant agencies and their responsibilities for inclusive education, and involve the community in the legislative process. In order to guarantee that all learners receive an equal standard of education, it is imperative to not only allocate cash to create an inclusive learning environment but also to implement adaptable strategies and incentives to utilize human and material resources effectively.

For the U.S., it is necessary to be concerned more about the training of teachers. A study conducted in Ghana revealed that the sole background characteristic of instructors in inclusive education that had a noteworthy impact on attitudes was their training in special or inclusive education. Hence, teacher training institutions must prioritize the development of teaching skills that would augment the ability of teacher trainees to assist students with disabilities in inclusive classrooms effectively. Additionally, these institutions should provide practicum experiences that entail working with such students. Local government should provide adequate teaching resources to all schools implementing inclusive education to assist teachers in the classrooms and mitigate the significant concerns surrounding inclusive education due to resource scarcity [18].

## **4. Conclusion**

Inclusive education in China and the U.S. is in the long-term process of achieving the goal of UNESCO. Both models face crucial challenges in their journey toward inclusion, whether pragmatic

or idealistic. Despite the challenges of achieving equal education for all students and eliminating all forms of segregation, policy remains the most effective way to narrow the gap.

## References

- [1] Malinen, Olli-Pekka. (2013). *Inclusive education in China*. CEREC Working Paper Series. 1-25.
- [2] Poon-McBrayer, K. F. (2016). *Resource room model for inclusive education in China: practitioners' conceptualization and contextualization*. *International Journal of Learning and Change*, 8(3/4), 317.
- [3] Fu, W. (2022c). *Chinese culture and inclusive education*. In *Routledge eBooks* (pp. 26–44). <https://doi.org/10.4324/9781003221852-2>
- [4] Florian, L. (2013). *The SAGE handbook of special education*. *The SAGE Handbook of Special Education*, 1-1040.
- [5] Zhang, C., & Miao, X. (2022). *Systematic Review on Chinese Special Education and Inclusive Education: China's Solution in Globalization*. *ECNU Review of Education*, 20965311221147310.
- [6] Li, L. (2015). *The three-decade-long developments of China's policy of inclusive education: the process, dilemma and strategies*. *Chinese Journal of Special Education*, 10, 16–20.
- [7] Kim, E., Zhang, J., & Sun, X. (2019). *Comparison of Special Education in the United States, Korea, and China*. *International journal of special education*, 33(4), 796-814.
- [8] Hossain, M. (2012). *An overview of inclusive education in the United States*. *Communication technology for students in special education and gifted programs*, 1-25.
- [9] Waitoller, F. R., & Thorius, K. K. (2015). *Playing hopscotch in inclusive education reform: examining promises and limitations of policy and practice in the U.S*. *Support for Learning*, 30(1), 23–41. <https://doi.org/10.1111/1467-9604.12076>
- [10] Deng Meng & Zhu Zhiyong (2007) *The Chinese "Learning in a Regular Classroom" and Western Inclusive Education: Comparison and Exploration*, *Chinese Education & Society*, 40:4, 21-32 [12] Blackwell, W. H., & Rossetti, Z. S. (2014). *The development of individualized education programs: Where have we been and where should we go now?*. *Sage Open*, 4(2), 2158244014530411.
- [11] Courey, S. J., Tappe, P., Siker, J., & LePage, P. (2013). *Improved lesson planning with universal design for learning (UDL)*. *Teacher education and special education*, 36(1), 7-27.
- [12] Nevin, A., Thousand, J., Paolucci-Whitcomb, P., & Villa, R. (1990). *Collaborative Consultation: Empowering Public School Personnel to Provide Heterogeneous Schooling for All-or, Who Rang That Bell?*. *Journal of Educational and Psychological Consultation*, 1(1), 41-67.
- [13] Bauwens, J., Hourcade, J. J., & Friend, M. (1989). *Cooperative teaching: A model for general and special education integration*. *Remedial and Special education*, 10(2), 17-22.
- [14] Waitoller, F. R., & Thorius, K. K. (2015). *Playing hopscotch in inclusive education reform: examining promises and limitations of policy and practice in the U.S*. *Support for Learning*, 30(1), 23-41.
- [15] Qu, X. (2022). *Structural barriers to inclusive education for children with special educational needs and disabilities in China*. *Journal of Educational Change*, 23(2), 253-276.
- [16] Boyle, C., Anderson, J., & Allen, K. A. (2020). *The importance of teacher attitudes to inclusive education*. In *Inclusive education: Global issues and controversies* (pp. 127-146). Brill.
- [17] Deng, M., & Zhu, Z. (2007). *The Chinese "learning in a regular classroom" and Western inclusive education: Comparison and exploration*. *Chinese Education and Society*, 40(4), 21-32.
- [18] Kuyini, A. B., & Mangope, B. (2011). *Student Teachers' Attitudes and Concerns about Inclusive Education in Ghana and Botswana*. *International Journal of Whole Schooling*, 7(1), 20-37.