ABSTRACT
            The Consortium on Inclusive Schooling Practices (1996)
developed a framework to analyze state and local policies and their
relationship to the development of inclusive schooling practices. The
framework focuses on standards-based systemic reform across six major policy
areas: curriculum, student assessment, accountability, personnel development
and professional training, finance, and governance. This brief discusses
accountability by defining the concept and illustrating six approaches to its
implementation, including: (1) accountability through performance reporting;
(2) accountability through monitoring and compliance with standards or
regulations; (3) accountability through incentive systems; (4) accountability
through reliance on the market, including vouchers and open enrollment
strategies; (5) accountability through changing the locus of authority or
control of the schools; and (6) accountability through changing professional
roles. System and student accountability are discussed, as well as the
different consequences states have mandated for district and school
performance. Specific perspectives on accountability as it relates to the
inclusion of students with disabilities are reviewed, including indicators of
accountability; federal, state, and local perspectives; and suggested family
assurances. The brief concludes that students with disabilities are
underrepresented in assessment systems and that there are few if any
incentives for their inclusion. (CR)

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Including Students With Disabilities in Accountability Systems

The Consortium on Inclusive Schooling Practices (1996) developed a framework to analyze state and local policies and their relationship to the development of inclusive schooling practices. The framework corresponds with the prevailing reform paradigm in most states by focusing on **standards-based systemic reform** across six major policy areas: curriculum, student assessment, accountability, personnel development and professional training, finance, and governance. This Issue Brief extends the discussion of one of these policy areas—accountability—by defining the concept and illustrating six approaches to its implementation. Specific perspectives on accountability as it relates to the inclusion of students with disabilities are then reviewed, including the indicators of accountability; federal, state, and local perspectives; and suggested family assurances.

Perspectives on Accountability

Accountability Defined

"Accountability" has become one of the most commonly used terms in the dialogue on educational reform. Broadly defined, the concept denotes the use of systematic methods to inform those inside and outside the educational system that schools are moving in desired directions (Erickson, 1997). Accountability systems at various levels of governance are being built around policies and practices that assign expectations to certain individuals or groups.

The central question is: Who must answer to whom, for what, and with what consequences?

Policymakers, practitioners, and the public have joined in the dialogue because they all want to know: Is education in this country producing the results that it should? At each level of governance—state and local—educators are striving to *define* and *document* educational effectiveness. The heightened interest in accountability is partly in response to public perceptions that educators are not being held responsible enough for student academic performance and that students themselves are not taking

enough responsibility for their efforts. Hence, states are adopting a wide range of policies under the name of accountability by expanding their initiatives to include such actions as publicizing student test scores district-by-district, establishing more stringent teacher relicensing requirements, imposing sanctions on low-performing schools, and—most drastically—declaring "academic bankruptcy" of under performing schools before taking them over or completely reconstituting their staffs.

Accountability systems, however, are not static. They are changing in at least two ways. First, the substance of accountability—the nature of what schools and districts are being held accountable for —is changing. Accountability systems are evolving toward a focus on student performance and program improvement that includes all student populations and programs within general education accountability. Second, accountability measures are changing. Accountability systems are shifting reliance upon using checklists of inputs to the qualitative review of district and school plans and student outcome data (Roach, Dailey, & Goertz, 1997).

Six Accountability Approaches

Given the growing emphasis on accountability, it is instructive to consider the various implementation approaches that have emerged. Kirst (1990) identified the following categories to describe different strategies that are being used.

(1) Accountability through *performance reporting*, including such techniques as statewide assessments; the National Assessment of Educational Progress (NAEP), the only on-going nationally representative measure of what students in the United States know and are able to do; school report cards; and such performance indicators as student dropout and graduation rates.

Such reports assume that information *per se* will stimulate actions to improve education.

(2) Accountability through *monitoring and compliance with standards or regulations*, including legal issues such as due process, rights of students with disabilities, as well as auditing approaches such as budget reviews. The key accountability criterion concerns procedural compliance.

(3) Accountability through *incentive systems*, including rewards for results and incentives to provide inducements for specific actions. By using processes that relate to and stimulate changes among input, processes, and outcomes, these approaches link performance information with specific policy outcomes that educators presumably can manipulate.

(4) Accountability through *reliance on the market*, including a range of approaches from such comparatively extreme versions as vouchers to the more limited strategy of open enrollment within a public school district. Accountability occurs when consumers choose among schools, with the poorer schools presumably closing if enough students leave.

(5) Accountability through *changing the locus of authority or control of schools*, including such devices as creating parent advisory councils, implementing school-site decentralization or community-controlled schools, and initiating state takeovers of districts. This approach posits that the key to making schools more accountable lies in changing those who control educational policy.

(6) Accountability through *changing professional roles*, including teachers reviewing each other for tenure and dismissal as well as school accreditation and teacher-controlled boards for initial licensing of gradu-

ates of teacher education programs. In addition, various plans to develop policy decisions to the school site call for teacher majorities on school-site councils, thus providing teachers with a new role beyond collective bargaining in site-based policymaking.

The six approaches identified by Kirst are not mutually exclusive. It often is difficult for policymakers to think systematically about the interrelationships and balances among the approaches. For example, enhanced political control at the school site requires a sophisticated school-based reporting system that focuses on broadly defined educational attainment goals.

Although Kirst does not explicitly discuss the inclusion of students with disabilities in accountability systems, the second approach is highly relevant in that special education primarily has relied on monitoring and compliance for accountability. This focus, however, is changing with the recent re-authorization of the Individuals with Disabilities Education Act (IDEA). The IDEA now requires that students with disabilities must be included in state or district assessments or be given an alternative examination. States must set performance goals for such students, and the goals must address the students' performance on assessments and dropout and graduation rates. Also, public reports must be provided on the progress toward those goals (IDEA Amendments, 1997).

System and Student Accountability

As the six approaches imply, accountability can be viewed at two levels—the system level or the student level. *System accountability* includes measures designed to hold districts and schools accountable. Although this type of accountability can employ student performance data, the focus mainly is on resource inputs, processes, and the operation of specific programs.

Student accountability focuses on measures that are designed to hold individual students accountable for their performance, including grading, promotion, and graduation requirements. The latter may be based on passing a state graduation examination, obtaining a particular grade-point average (GPA), earning a particular number of Carnegie units, or some combination of the three. Grade promotion requirements may include obtaining a particular GPA or score on a state- or district-generated assessment. Student-level accountability components often are included in the larger state accountability system (Roach et. al., 1997).

An important unresolved question remains: *In either type of accountability— system or student —are students with disabilities included? In other words, are they "in" or "out" of the system?*

The Matter of Consequences

Performance- or outcome-based accountability systems cannot be sustained without well-defined consequences for results (Erickson, 1997). The idea of enforcing consequences based on performance has led many states to build sanctions and rewards into their accountability systems. These consequences often are described as either "high stakes" or "low stakes" in order to reflect the level of risk being placed on those accountable for the expected results. Examples of "high stakes" include the threat of school reconstitution or, conversely, the opportunity to receive financial rewards. "Low stake" accountability systems might only enforce the public reporting of results with no further consequences mandated.

The Matter of Consequences

States are increasingly mandating both positive and negative consequences for district and school performance.

•   **Probations or watch lists (15 states).** Districts or schools that are not making progress at a predetermined rate are given cautionary notice that improvements must be made within a certain time frame to avoid harsher consequences.

•   **Warnings (12 states).** Districts or schools are issued official warnings from state educational agencies (SEAs) informing local officials of inadequate performance or progress.

•   **Accreditation loss (11 states).** A lack of adequate performance or progress in meeting goals leads to losing status granted through state accreditation agencies.

•   **Takeover by state agencies (9 states).** This high stakes consequence often involves removal of the local school board and top district administrators, with intermediate governance provided by SEA officials.

•   **Funding gains (8 states).** This "positive stakes" condition exists when monies are distributed to districts, principals, or school staff as a result of meeting or exceeding expected student performance goals.

•   **Regulatory waivers (8 states).** This is a "positive stakes" condition where SEAs relieve districts or schools from certain regulatory requirements in response to positive gains in student performance.

•   **Funding loss (6 states).** This negative "high stakes" consequence for low-performing districts and schools involves the loss of state financial aid.

•   **Dissolution (4 states).** This highly negative consequence leads to the entire dissolution of the district or school under the supervision of the SEA.

In addition, 19 states currently award diplomas to individual students based on their successful performance on high school graduation examinations.[1] Such policies create "high stakes" particularly for students with disabilities, and indirectly place considerable pressure on the districts or schools responsible for their educational success.

[1]*Source*: Erickson (1997).

Note. The reference to the 19 states that use high school graduation examinations also should emphasize that it is, indeed, high stakes for students with disabilities. In many cases, those states evidence a significant increase in drop-out rates among students with and without disabilities. Thus, while the completion rates for an individual school may look satisfactory, in fact the students with disabilities have dropped out and their scores may not be reflected in the final count (Thurlow, Ysseldyke, & Anderson, 1995).

Perspectives on Accountability and the Inclusion of Students with Disabilities

There are compelling reasons to include students with disabilities in special education reform efforts in general accountability systems (U.S. Department of Education, 1994; McDonnell & McLaughlin, 1997) beyond the need to meet new federal requirements. Including students with disabilities can enhance the sense of responsibility general education teachers feel for the educational results or performance of students with disabilities as well as focus the entire school community on the performance of students with disabilities. Including students with disabilities also can lead to higher student expectations for students with disabilities and contribute to unifying the dual systems of general and special education (Roach et. al., 1997).

The Assessment of Students with Disabilities

In the past, the primary way in which national, state, and local administrators made accountability decisions for students with disabilities has been through child count and compliance monitoring. Districts received funds based on the number of students identified with disabilities. However, funding could be removed as a consequence of noncompliance with special education laws. Compliance with state or national policy on the delivery of services to students with disabilities is both the source of funding and monitoring of procedures for special education. According to the PEER Project (1997), it is clear that the traditional compliance-based procedure does not look closely at the question, "Is the student learning?", but instead addresses the question, "Is the student getting the services on the IEP [Individualized Education Plan]? Therein lies the real issue of accountability and assessment."

A system is accountable for all students when it assures that all students count or participate in the evaluation program. Although every student does not take the same test, progress of all students is accounted for and included when

reports about the educational system are made. If students are not tested, however, they often become both "out of sight" and "out of mind." When states and districts do not include these students in testing, they tend not to include them in instruction.

The idea of mandating states and districts to include all students on assessments also raises "the matter of consequences." As the stakes increase, decisions about who participates and the ways in which they participate often change. When assessment is for "high stakes," students who are expected to do less well often are excluded from the assessment and/or the reporting of the results.

Inputs, Processes, and Outcomes

As noted, one of the primary characteristics most apparent in the educational reforms that are taking place throughout the country is the shift from traditional approaches of documenting the "inputs" and "processes" of educating students to focusing on "outcomes." However, accountability systems are not abandoning "input" and "process" indicators as much as they are extending their views to include "outcomes" as well. The new models of accountability are, therefore, becoming more sophisticated. Nonetheless, whatever approaches are used, policy-makers, legislators, school administrators, and the public simply want to know the extent to which education in the United States is working.

Input indicators. Schools collect data on a variety of factors to better target program resources (e.g., staff, instruction, and resources allocated to each child) and monitor violations of equity in education. For example, Maryland's accountability database includes data on resources, including money spent per pupil, student to staff ratios, and instructional time. Data also are collected on student characteristics such

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as change of residence; the number of students with limited English proficiency; the number of students receiving special education services; the number enrolled in special education, Chapter I, and free/ reduced meal programs; and, of course, the number of students with disabilities.

Process indicators. Many educators indicate that one type of information needed is the extent to which students with disabilities have "an opportunity to learn." Typically, they are referring to exposure to curriculum, time spent in school and in special education settings, and dollars spent on education. Many assert that states should collect data on the extent to which students with disabilities are integrated into special education. Along with this, they suggest that we ought to know the extent to which IEPs translate into instruction, and that one source of information on how well education is working for these students would be the number of students who meet IEP objectives.

Outcome indicators. There clearly is a new way of thinking about accountability. Many educators are moving toward including what they consider to be the most critical type of data needed in making decisions about educational effectiveness, namely, outcome data. They maintain that they would believe education was working well for all students if those with disabilities were becoming proficient in academic and functional skills, achieving social and emotional outcomes, and generalizing what they learn in school to life outside the classroom. They also indicate that data on the transition out of school should be collected from follow-up studies of student and parent satisfaction; access to post-secondary education; impact studies on student employment, independent living, and community participation; and an analysis from the private sector of the extent students with disabilities meet the needs of

the labor market.

The Federal Perspective

Recent federal legislation has emphasized an inclusive approach toward *holding schools accountable* for the results of *all* children and youth. Section 3(1) of *Goals 2000: Educate America Act* states that "The terms 'all students' and 'all children' mean students or children from a broad range of backgrounds and circumstances, including . . . students or children with disabilities."

In addition, under the 1997 amendments to the IDEA, all students with disabilities must be included in state or district assessments or be given an alternative examination (IDEA Amendments, 1997). Approximately half of all students with disabilities are currently excluded from state- and district-wide assessments. The new amendments specifically require: (1) the development of state performance goals for children with disabilities that must address certain key indicators of the success of educational efforts for these children—including, at a minimum, performance on assessments, dropout rates, and graduation rates, and regular reports to the public on progress toward meeting the goals; (2) that children with disabilities be included in general state and district-wide assessments, with appropriate accommodations, if necessary; and (3) that schools report to parents on the progress of the disabled child whenever such reports are provided to parents of non-disabled children (Federal Register, 10/22/ 97, p. 55029). From a federal perspective, therefore, the message is unmistakable: educational reforms—including accountability reforms—should include *all* students, including those with disabilities.

The reauthorization of the IDEA requires that students with disabilities be included in statewide assessment and reporting systems (IDEA Amendments, 1997). However, it does not include inclusion of students with disabilities in states' formal accountability systems. Thus, states, districts, and schools may assess and report on students with disabilities without being held accountable for them under their general standards-based accountability systems. While states are revising assessment policies to include all students, most standards-based accountability systems do not include students with disabilities in either design or practice (Goertz & Chun, 1997). For example, Texas explicitly excludes special education students from its accountability system until 1999, although districts may include students with disabilities who take the state test (TAAS) without any stakes.

Moreover, Goertz and Chun (1997) report that in practice, incentives in states' assessment and accountability policies exclude or overlook students with disabilities. In Maryland, for example, over-exemption of students with disabilities means that their scores are not included in school assessment scores, a key component of a school accountability rating. Texas plans to include special education students in its accountability program beginning in 1999. Unlike race/ethnicity, gender, or economic status, special education will not be a sub-group for which districts and schools are held accountable. Performance of students with disabilities will be included in the scores of the general population. Accountability for students with disabilities in states like Texas will be absent in practice.

The following examples illustrate some of the diverse approaches to *state-level* accountability.

North Carolina. North Carolina has enacted the "ABC" plan for education. The focus is on "Accountability, the Basics, and Control at the local level." Dimensions of the plan include: setting school-level standards for student growth and performance; measuring student performance and achievement school-by-school; monitoring student achievement school-by-school; identifying and recognizing high levels of student growth and performance at the district and school level; identifying districts and schools with "unacceptable performance and growth," and providing assistance and/or interventions when necessary. If students— including those with disabilities—meet the general testing guidelines, they participate in the "ABC" plan. To recognize and reward local educators and schools that exceed their goals, the General Assembly has provided funding for School Incentive Awards. All schools achieving exemplary growth standards will have the opportunity to receive awards averaging between $500 and $1,000 per staff member. Other well-performing schools also will receive a variety of recognition awards, e.g., in the form of certificates.

Delaware. Delaware recently has instituted new legislation, the Comprehensive Accountability Plan, that—among other provisions—must address the role of state tests in decisions about student matriculation, extra help, or special recognition. In addition, the procedures and methods are used to establish levels of proficiency to be required for graduation and for entrance into high school. The approach also includes: individual and/or collective accountability for teachers and administrators that is linked to the standards to be adopted for these groups; opportunities for pre-service program approval; induction and initial monitoring, certification and re-certification, and performance appraisal; recommend-ations

on district- and building- level incentives; recommendations on the proper use of data; the role of other assessments; an analysis of the impediments to accountability; and a timetable for implementation of the comprehensive system. It is anticipated that children with disabilities will be included in the accountability system. Efforts already are underway to develop an Alternate Assessment for students in functional/life skill curricula. The approach will be a standards-based assessment that is linked to the state content standards. Students in academic curriculum will participate in the Delaware State Testing Program (DSTP) with accommodations as required by their IEPs. Efforts also are underway to make the test as accessible to as many students as possible.

New York. In the summer of 1997, the Board of Regents reviewed general directions for revising graduation requirements that emerged from public forums. Feedback from these forums reflect a considered response to some of the major themes that were generated rather than a consensus of public sentiment. The themes dealt with course requirements, flexible programming, timing of the new requirements, diplomas, provisions for students with limited English proficiency, and provisions for special education students. The course requirements included increasing the minimum number of credits required for graduation from current requirements of 20.5 to 22; setting a common core of requirements for all students; and requiring a concentration (beyond the core requirements) of all students with opportunities for in-depth, applied learning in an area of choice. The following were among the major provisions for special education students: (1) eliminate the "minimum competency" local diploma option and replace it with the "higher standard" Regents Diploma, thereby

requiring that school districts ensure that students with disabilities have access to these courses; (2) require students to pass five Regents exams for the basic Regents Diploma and eight for the advanced Regents Diploma; and continues to require districts to use, when appropriate, test modifications; and (3) ensure that, during the phase-in period for new exams, students with disabilities have an opportunity to get a high school diploma without the danger of "falling through the cracks." The purpose of these changes is to phase out the lower competency expectations and replace them with the expectation that students with disabilities will perform at a higher standard.

The following examples illustrate several approaches to *local-level* accountability.

San Diego. The following are the primary points in San Diego's accountability system: (1) the school is the "unit of accountability"; and (2) all stakeholders—the board of education, superintendent, assistant superintendents, central office staff, principals, teachers, parents, community, and students—are mutually accountable for the improvement of student achievement. Major activities of the process across a two-year cycle include: (1) school performance will be determined using school-wide and disaggregated data from multiple indicators of student achievement, including norm-referenced tests, portfolios and exhibitions, report cards, performance tasks, and advanced course completion; (2) district goals will be identified for each performance indicator; (3) school improvement targets will be set from each school's baseline data for school-wide performance and for subgroups identified with an achievement gap; (4) a "first cut" at the end of each cycle will determine the degree to which each school attained its targets. Schools will be identified as: Exemplary in Meeting Targets, Successful in

Meeting Targets, Satisfactory in Meeting Targets, or Needs Review—Not Meeting Targets. Students with disabilities receive grades, prepare portfolios, and take the tests as everyone else. Their scores are counted in the accountability system.

Rochester. The following is a brief summary of goals which apply to all students from pre-school through high school in Rochester, New York. (1) By 1999, 90 percent of students will meet or exceed the state performance standards in reading, writing, and mathematics; (2) By 1999, 5,000 students will pass state Regents' or higher-level courses; (3) By September 1998, the district will eliminate lower-level general mathematics courses and will reduce the number of students enrolled in all lower-level high school courses; (4) By 1999, at least 85 percent of students will graduate; (5) By September 1998, the district will establish an alternative learning site for disruptive and violent students and will have family wellness centers in all middle schools and one health clinic in each high school. (6) Beginning with the 1995-96 graduating class, partnerships are to provide 100 full-time jobs each year for graduates who meet academic and workplace standards, and the number of area colleges and university scholarships will increase by 15 percent annually.

Students with disabilities presently receiving services at an Option 1 (15:1) or lesser level (related services only, consultant teacher, or resource services) are included in the academic benchmarks. The district is reviewing the current academic benchmarks to determine the extent to which they are applicable for students receiving higher levels of service with the goal of ensuring that students with disabilities meet applicable academic benchmarks to at least the same degree as students without disabilities.

Key Issues to be Addressed at the State Level

Shared content standards for students with disabilities appear to be one of the most significant issues for states to consider as they develop assessment and accountability systems. In personal correspondence, Jacqui Farmer Kearns of the Kentucky Systems Change Project, notes there is a danger if a different set of content standards is determined for students with disabilities, Kearns suggests further segregation and a lack of opportunity to learn will result. In that light, simply adding students with disabilities to an existing system may or may not have the intended results.

Kearns further indicates that in some high stakes systems (where schools receive rewards and/or sanctions based on assessment results), such as Kentucky, schools that fail to meet their achievement goals are identified and receive technical assistance and additional professional development funds to address their needs. In some cases, this additional assistance may exceed what the school would receive had they been identified as a reward school. In effect, they do not lose funds but actually may gain funds. While the stigma of being identified as a school in "crisis" has some significant implications in and of itself, there is a safety net; in fact, no school in Kentucky as yet has been dissolved.

In addition to these issues, state education agencies concerned with including students with disabilities in their accountability systems need to consider a number of issues, such as whether or not the system:

•   focuses mainly on the teaching/learning process for all students or on such environmental factors as the number of books in the library or space availability in the classroom;

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o	focuses on student performance as the basis for compiling data on student learning, as well as on assessment data for students with disabilities, which is disaggregated, but still is part of a district's report;

o	collects data on the number of students excluded from state assessments in a district and includes follow-up provisions when the percentage of excluded students is too high;

o	provides programmatic and regulatory flexibility that considers student outcomes for students with disabilities;

o	includes indicators articulated for students with disabilities and other special populations in their statewide accountability plans;

o	provides for monitoring that is linked to district accountability/accreditation procedures;

o	provides rewards and sanctions so that the accountability system "matters" to the districts; and

o	includes special education in consolidated plans submitted to the federal government (Consortium on Inclusive Schooling Practices, 1996).

Key Issues to be Addressed at the Local Level

Districts that are concerned with including students with disabilities in their accountability systems need to consider a number of related issues, such as whether or not they:

o	maintain a results-oriented data collection, analysis, and reporting system that is aligned with the state accountability system and that focuses on the types of services students need rather than on labels or placement;

o	include reporting mechanisms to local school boards and student advocacy groups;

o	produce a "report card" on schools that includes data and information on students with disabilities while schools themselves develop a similar report that is shared with the community;

o	include members of the community— parents, teachers, administrators, civic leaders, and students themselves—as part of the review groups for student performance (e.g., demonstrations and exhibitions);

o	maintain documentation of accommodations/adaptations made for students with disabilities to ensure that maximum participation in the accountability system is supported;

o	develop data systems that track the progress of students in inclusive programs as well as those served in segregated, pull-out programs;

o	develop suitable alternative assessment formats, e.g., portfolios; and

o	include special education in consolidated plans or strategic plans for the state (Consortium on Inclusive Schooling Practices, 1996).

Family Assurances and Caveats

Mandating the inclusion of students with disabilities in accountability systems is not enough. Families want assurances that if a student is part of the accountability system, accommodations and modifications from the student's IEP are implemented in a viable way, individualized, and done by people

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who know the supports that enable the student to be successful. Furthermore, those administering the test must be experienced in communicating with the student. If the goal is to measure what a student knows and is able to do, the supports that ensure the student's success must be in place. If not, the test results can be invalid and potentially damaging to the student by limiting future opportunities. Another concern expressed by families is that students might be tested for content for which they have had limited access. If students have been educated primarily in self-contained classrooms without depth or breadth of curriculum, the likelihood of success on measures of their mastery of the core curriculum will be seriously compromised (Buswell, 1997).

Conclusions

Students with disabilities are under-represented in nearly all states' assessment systems. There are few if any incentives for increasing inclusion of students with disabilities in assessments. This practice may lead to sorting students and ranking some students as more valuable than others. . . . As states move to implement new ways of making accountability decisions, students with disabilities present a significant obstacle. It is tough to implement new forms of accountability practice. It is much tougher when all students must be included (Ysseldyke, Thurlow, & Geenen, 1994).

As noted at the outset, a number of compelling reasons exist for including students with disabilities and special education in reform efforts and account-ability systems. While several promising approaches are evident, there are also tensions related to (1) point of emphasis (e.g., the degree to which the focus should be on system or individual student accountability) and (2) indicators of change (e.g., the degree to which the focus should

be on inputs, processes, or outcomes). Many educators are striving to overcome these tensions by seeking a balance between emphases and indicators; that is, they do not necessarily view these as "either-or" issues but rather see them as challenges— incorporating the best of what various points of view have to offer. Nonetheless, the primary, and still unresolved, issue is how students with disabilities fit into the "scheme of things," whether they are "in" or "out" of the loop. In short, will we have accountability for some or all students?

The concept of inclusive schooling, after all, means that all students attend their home school along with their age and grade peers. To the maximum extent possible, all students, including those with disabilities, receive their in-school educational services in general education classrooms with appropriate in-class supports. Inclusive practices, therefore, imply more than just being in a classroom or a single instructional method. Inclusive practices provide a means of supporting children and youth in their learning in ways that affect the entire educational system. We contend that the concept of the "entire system" extends to and encompasses the "accountability system."

In summary, a well-designed accountability system must have a balanced focus that combines school context, processes, and student performance to guide school improvement efforts. It must be based on a wide array of authentic data, including an examination of the resources needed as well as those allocated. A well designed accountability system must include *all* students, including those with disabilities. An inclusive system must be applied fairly and equitably to all its learners.

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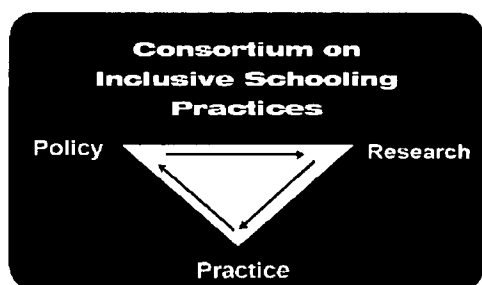
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