Beyond *Corey H.* to a Full Continuum: The Role of Comprehensive Teacher Certification Schemes in the Progress of LRE

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The idea of the “least restrictive environment” (LRE) has been a part of special education since 1975, when the Education for All Handicapped Children Act\(^1\) (EAHCA) was enacted to remedy the shocking realities for students with disabilities: more than 4 million of them were not receiving appropriate educational services, and one million were excluded from public schools entirely.\(^2\) The Individuals with Disabilities Education Act (IDEA) replaced the EAHCA in 1990\(^3\), but retained its core requirement that “[t]o the maximum extent appropriate, children with disabilities . . . are [to be] educated with children who are not disabled, and special classes, separate schooling, or other removal of children with disabilities from the regular\(^4\) school environment [should occur] only when the nature or severity of the disability of a child is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.”\(^5\) However, as the Third Circuit noted in *Oberti v. Board of Education*,\(^6\) there is a "tension within the [IDEA] between the strong preference for mainstreaming\(^7\) and the requirement that schools provide individualized programs tailored to the specific needs of each disabled child [citations omitted].” Perhaps no other state has felt this tension more acutely than Illinois, whose federal courts faced more than a decade of litigation that attempted to resolve the hotly contested issues of what the phrase “least restrictive environment” really means, and how state educational agencies can best ensure that its schools provide that kind of environment.

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2. *Id.* at § 3(b)(1)-(5) “Statement of Findings and Purpose”
4. Please note that most research sources seemed to prefer the term “general” over “regular” to describe classrooms in which students without disabilities were the majority. For the sake of consistency with the IDEA, I have used “regular” to describe such settings. The two terms should be considered interchangeable for the purposes of this paper.
7. *Id.* at 1207 n.1. The court explained it would use “mainstreaming” rather than “inclusion” to refer to LRE requirements because it was more commonly used. I will use “inclusion” to refer to the placement of students with disabilities in regular education classrooms with any modifications necessary for them to benefit academically and socially. I agree with plaintiffs in *Oberti* that mainstreaming “suggests . . . the shuttling of a child in and out of a regular class without altering the classroom to accommodate the child.” *Id.*
The instigator of this battle was *Corey H. v. Board of Education*, where a class of students with disabilities in the Chicago Public Schools (CPS) successfully challenged, among many other things, the system by which the Illinois State Board of Education (ISBE) trained and certified special education teachers. To help end CPS’s segregated placement of students according to their disability category, which the court found to be a violation of the LRE provision and within ISBE’s responsibility to correct, ISBE dramatically altered its teacher certification system “to ensure that [it] complies with rather than contradicts the LRE mandate.” The new standards combined five of the former system’s eight single-disability certificates into a cross-categorical “Learning Behavior Specialist” certificate. To better prepare regular education teachers for the students with disabilities that would be joining their classrooms, ISBE added the Assessment of Professional Teaching test, which includes special education as one of its content areas, to the battery of tests required for their certificates. Recently, ISBE went even further and enacted a rule requiring all new teachers seeking certification to have completed special education coursework.

While some in the disability and special education community celebrated *Corey H.* as a landmark reform, another class of students with disabilities and special educators from outside CPS, the *Reid L.* class, tried to prevent enforcement of the new rules in districts other than CPS. They asserted that teachers with the generalist special education certificate would not be as

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9 *Id.* at 909. A February 1996 report from the Office of Special Education Programs found that 90% of CPS students identified as “trainable mentally handicapped,” 96% of students identified as severe/profound mentally handicapped, and 92% of students with autism were placed full-time in a segregated class, wing, annex, or school.
10 *Id.* at 918.
11 *Id.* at 905-06.
12 *Id.* at 911
13 *Reid L. v. Ill. State Bd. of Educ. (Reid I)*, 289 F.3d 1009, 1014-15 (7th Cir. 2002). The three remaining single-disability certificates, for those teaching students with vision impairments, hearing impairments, and speech/language disorders, were retained.
qualified to teach students with disabilities and would have such “superficial knowledge of so many disability areas” that they would not provide an appropriate education to students with more severe disabilities. Their claim was dismissed for lack of standing and the new certification system ultimately took effect, but the debate about how to best educate students with disabilities, and how to prepare those who will educate them, rages on in Illinois and across the country.

In 2006, Professor Ruth Colker reviewed the origins and impact of the LRE provision. In the process, she both identified how the tension between inclusion and individualization arose and proposed a way to move past it. She argued that courts have interpreted the LRE provision in far too absolutist of terms; and that while this hard line stance is useful for breaking down prejudices, policies, and institutions that lead to undue segregation of students with disabilities; it also ignores the educational needs of some students who do not benefit from inclusion. To better promote the rights of students with disabilities, Colker asserts that courts and educational policymakers should focus more on providing a spectrum of placement options to meet the widely varying social and educational needs of students with disabilities.

Corey H. and Reid L. are a remarkable set of cases because they provide both a rich demonstration of Colker’s theory and a creative, systemic approach to creating the variety of placement options she believes is so critical: teacher certification reform. This paper seeks to expand upon the important but somewhat flawed special education reform efforts of Corey H.

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16 Appellants’ Brief at 42, Reid I, 289 F.3d 1009 (7th Cir. 2002) (No. 01-3432), 2001 WL 34135430.
17 Reid L. v. Ill. State Bd. of Educ. (Reid II), 358 F.3d 511, 516 (7th Cir. 2004).
19 See id. at 814-17, 855.
20 See also 34 C.F.R. § 300.115 (2004) (requiring a “continuum of alternative placements.”)
21 Colker, supra note 18, at 857.
22 See J. Matt Jameson & Dixie S. Huefner, Article, “Highly Qualified” Special Educators and the Provision of a Free Appropriate Public Education to Students with Disabilities, 35 J.L. & EDUC. 29, 45 (2006) (describing Corey H. as an “outlier” because most cases involving teacher qualifications in the LRE context challenge only whether the teacher meets state and federal standards, not the validity of the state standards themselves).
and explain why a comprehensive teacher certification scheme is a central part of faithful implementation of the LRE provision. Part I will further explain Colker’s LRE framework and apply it to Corey H. and Reid L. to elucidate how the cases serve as both inspiration for reform and a cautionary tale against tailoring that reform too narrowly. Part II will present empirical evidence that exposing both regular and special education teachers to the fundamentals of each other’s fields (“cross-training”), cross-categorical certificates like those developed in the Corey H. remedy, and the single-disability certificates that Corey H. fought so hard to strike down, are all valid parts of a teacher certification scheme that will uphold the IDEA’s dual goals of integrating and educating students with disabilities.

PART I

The essence of Professor Colker’s evaluation of the law surrounding the LRE provision is that in using civil rights ideals rather than sound educational research as the basis for special education reform, the disability rights movement and most federal courts have promoted equal treatment at the expense of equal opportunity.23 In her review of the history of the LRE provision, Colker finds that the disability rights movement modeled much of its activity after the racial civil rights movement, and thus that the LRE provision came to be included in the EAHCA for many of the same reasons that “separate but equal” public schools were outlawed in Brown v. Board of Education.24 25 Integrating students with disabilities into regular education classrooms was advocated as a moralistic and constitutional obligation; there was little to no analysis of the extent to which these settings would actually teach them anything.26 Despite the fact that the LRE provision seems to put plenty of qualifiers around its call for inclusion, only requiring it to

23 See Colker, supra note 18, at 790.
25 See Colker, supra note 18, at 805-809.
26 Id.
“the maximum extent appropriate” when an educational benefit can be “achieved satisfactorily,” Colker’s review of case law shows that courts have latched on to the LRE provision’s civil rights origins and made it an inflexible, basically irrebuttable presumption that requires the inclusion of students at nearly any cost, what she calls the “integration presumption.” For example, in Daniel R.R. v. State Board of Education, the school district was required to prove that a student with mental retardation would receive no educational benefit in a regular classroom setting to prevail on its argument that the student should be placed in a segregated special education classroom within the regular school. Colker also reviews studies which found that some students with disabilities are likely to perform worse in regular education settings. In response to the notion that placement in a regular education room is less stigmatizing and better for social development, Colker presents evidence that some students found the opposite to be true and preferred a pull-out program or resource room model.

Considering all of the above, Colker comes to the conclusion that the integration presumption has been beneficial only to the extent that it brought about the end of widespread institutionalization and segregation of students with disabilities. 

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27 Supra note 5.
28 For example, in the quote from Corey H. on p. 2, the court used the phrase “LRE mandate.” Supra note 12. I have chosen to use the phrase “LRE provision” to reflect its more nuanced construction.
29 See Colker, supra note 18, at 816.
31 See also Roncker v. Walter, 700 F.2d 1058, 1061, 1064 (6th Cir. 1983) (lower court’s decision to place a boy with severe mental retardation in a segregated county school overturned despite the fact that he had made no significant progress during his past 18 months in a special education class within a regular school).
32 See Colker, supra note 18, at 825-835, citing Naomi Zigmond et al., Special Education in Restructured Schools: Findings from Three Multi-Year Studies, 76 PHI DELTA KAPPAN 531, 533-40 (1995) (study of students with learning disabilities in three “strong inclusion” programs found that only thirty-seven percent of students made average or better educational gains, and forty percent made gains of less than half the grade level averages).
33 Id. at 833, citing Joseph R. Jenkins & Amy Heinen, Students’ Preferences for Service Delivery: Pull-Out, In-Class, or Integrated Models, 55 EXCEPTIONAL CHILD 516 (1989).
34 Id. at 855.
most part been accomplished, she believes it should be implemented only in districts that do not have a variety of special education options in place and still need the more basic structural reform it encourages. Conversely, in districts that have already made these improvements, courts should not have almost absolute right to force students into the most inclusive placement when there is evidence indicating that inclusion is “not necessarily the best educational option” for a student. Colker argues that courts should instead focus on determining the proportion of inclusion and combination of services that will create the most educational benefit. On the whole, her message is that in today’s post-institutional world, successful implementation of the LRE provision depends on making truly individualized determinations of students’ needs and creating a variety of settings with different levels of integration.

This framework is helpful for understanding both why the remedies ordered in Corey H. were so important for CPS and why the parties in Reid L. were so displeased with them. CPS, with its heavily segregated, “archaic” special education program, was the epitome of the stagnant school district for whom Colker asserts the integration presumption is still necessary. By forcing the district to include more special education students in its regular classrooms and changing teacher certification to put a stop to single-disability placements, Corey H. gave CPS the wake-up call it desperately needed and made it treat its students with disabilities as full and equal participants in the educational process.

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35 Id. at 795, citing Spencer J. Salend & Laurel M. Garrick Duhaney, The Impact of Inclusion on Students with and without Disabilities and Their Educators, 20 REMEDIAL & SPECIAL EDUC. 114 (1999) (less than five percent of children with disabilities were being educated in disability-only schools at the time of publication).
36 Id. at 857.
37 Id. at 856.
38 Id. at 861. Encouragingly, a response to Colker’s article asserts that courts have indeed begun to shift to this “more nuanced approach.” See Mark C. Weber, A Nuanced Approach to the Disability Integration Presumption, 156 U. PA. L. REV. PENNUMBRA 174, 182-83 (2007), citing, e.g., Sacramento City Unified Sch. Dist. v. Rachel H., 14 F.3d 1398 (9th Cir. 1994) (court built upon the test from Daniel R.R. to include four factors that schools must consider when advocating a more segregated placement: academic benefit, nonacademic benefit, the teacher’s ability to manage the classroom along with the disabled student’s needs, and the cost of each placement.)
39 Reid I, 289 F.3d at 1013. See also Mary T. Brownell et al., Special Education Teacher Quality and Preparation: Exposing Foundations, Constructing a New Model, 76 EXCEPTIONAL CHILDREN 357, 361 (2010) (most school districts began moving away from strictly categorical placements in the 1970s).
equal members of its student body, which no one can argue are negative outcomes. However, while a new, multi-disability teacher certification system may have been necessary to prevent CPS from maintaining its old bad habits, it threatened to destroy any specialized (and thus by necessity more segregated) placements that other Illinois districts with more comprehensive, up-to-date special education programs had developed for students who simply could not learn in a regular education environment. No briefs or opinions specify the districts in which the Reid L. parties attended school and worked, so it is impossible to say that they actually represented districts with a “continuum of alternative placements,” but their arguments are if nothing else representative of districts that have already moved far beyond the basic issue of “to include or not to include” and thus would be harmed by the integration presumption.

The Reid L. parties were right to remind the court that the “substantial, long-term” harm that comes from poorly designed educational policies “far outweighs” any harm that could have come from delaying the implementation of the Corey H. remedies. Corey H. and Reid L. exemplify both the contrast and the conflict between Colker’s two categories of school districts. While Corey H.’s recognition that teacher certification laws play a huge role in implementing the LRE provision is laudable, it was wrong of the court to over- and misapply to the rest of the state a certification system so individualized to the needs of only one non-representative, severely troubled district. In doing so, it undercut its ultimate goal of ensuring students with disabilities receive a placement suited to their individual needs.

PART II

If legal and educational scholars take only one idea away from Colker’s framework, it should be her plea that “we need to be careful to fashion a set of remedies that can assist the

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40 Supra note 20.
41 Reid I Appellants’ Br., supra note 16, at 40.
range of children with disabilities."\textsuperscript{42} The Northern District of Illinois tried to create such a set of remedies, and made the groundbreaking decision to alter teacher certifications as one of them, but it still ultimately fell victim to the integration presumption and failed to create a comprehensive certification system suitable for the entire state. By drawing from both the lessons of \textit{Corey H.} and educational research, I have developed a proposal of what a carefully fashioned teacher certification remedy might include. The Supreme Court has warned that lawyers are no substitute for educators in matters of determining special education policy or placement.\textsuperscript{43} Thus, I do not presume to assert that this is a flawless plan; it is simply a set of three general goals for teacher certification standards that, with educational experts defining the specifics of achieving them and states tweaking them according to their own demographics and circumstances, would do much to ensure an appropriate educational setting for all students.

First, all teachers should be “cross-trained” to an appropriate degree to promote coordination between all members of the team involved in the education of a student with disabilities. Regular education teachers need at least a basic understanding of special education techniques so that they can adapt their curriculum.\textsuperscript{44} Conversely, because the IDEA now requires special education to be much more rigorous than “remedial instruction in basic skills,”\textsuperscript{45} special education teachers need more content knowledge, which is emphasized more in regular education preparation. Second, there should be at least one\textsuperscript{46} cross-categorical certificate to

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\textsuperscript{42} Colker, \textit{supra} note 18, at 799-800. \\
\textsuperscript{44} Corey H., 995 F. Supp. At 909. \\
\textsuperscript{45} Mary T. Brownell, \textit{Reconsidering the Preparation of Special Education Teachers: Why a Background in General and Special Education is Necessary}, COUNCIL FOR EXCEPTIONAL CHILDREN, http://www.ccc.sped.org/AM/Template.cfm?Section=Home&TEMPLATE=/CM/ContentDisplay.cfm&CONTENTID=13469 (last visited May 19, 2010) \\
\textsuperscript{46} Reid I, 289 F.3d at 1015 (The Blue Ribbon Task Force recommended combining the same five categorical certificates that were combined under the LBSI, but creating \textit{two cross-categorical licenses} in their place: an “adapted curriculum focus” for students who required minimal adjustments to regular education, and a “modified curriculum focus” for those who required more substantial services in a regular education room) 
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support students with mild to moderate disabilities who benefit from receiving at least part of their instruction in regular classrooms, as well as students with more than one disability. Finally, for students with the most severe disabilities, or disabilities whose effects prohibit them from receiving any meaningful benefits from a regular classroom, single-disability certificates should be available so that these students can be educated by a teacher with in-depth knowledge of their abilities and needs.

**Cross-training**

Ensuring that regular education teachers understand fundamental special education concepts, and vice versa, is probably the most important part of any teacher certification reform. As Corey H. found, based on the statements of one of the joint panel experts, “the most important factor in ensuring that children with disabilities are educated in the least restrictive environment is ‘[t]hat they have teachers who are knowledgeable and have the appropriate attitude and skills.’” 47 Regular education teachers must be able to adapt their methods and coordinate effectively with their disabled students’ aids or resource teachers because otherwise the very idea of inclusion is “baffling.” 48 Children are generally identified for special education services because they are having academic or social problems in the regular classroom; labeling them as requiring special education but then putting them back in more or less the same setting does no one any good.

Changing regular educators’ perception of and attitudes toward students with disabilities may be even more important than updating their pedagogical skills. Despite the dramatically increased presence of disabled students in regular education settings since the LRE provision

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47 Corey H., 995 F. Supp. at 910.
48 Colker, *supra* note 18, at 796.
took effect, “special education remains a place to send the child, rather than a bundle of services to help the child” in the eyes of too many regular education teachers. Among the many problems identified in Corey H. was the regular educators’ limited understanding of their role. They rarely collaborated with special education teachers, having decided instead that “it was the obligation of students with disabilities who participated in their classes to master the regular education curriculum with few modifications, and that is was up to special educators to enable students with disabilities to keep up in the regular classroom.”

On the contrary, collaboration is essential for effective inclusion. It has been shown to improve student performance more or less universally, along with teacher morale, dedication, and efficacy. Cross-training teaches regular and special educators to “speak each other’s language” so that they can effectively combine their knowledge to meet the needs of their student. Some teacher preparation programs place so much importance on good collaboration skills that they offer “integrated teacher preparation” in which regular and special educators complete a substantial proportion of their coursework together.

It is indisputable that for the LRE provision to produce the change it was meant to, “[s]pecial education [teachers] should no longer be solely responsible for the progress or lack thereof of special education students in regular education classrooms increased nearly 20%.”

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49 Id. at 795, citing John H. Holloway, Inclusion and Students with Learning Disabilities, EDUC. LEADERSHIP, Mar. 2001, at 86 (between 1986 and 1996, the number of students with learning disabilities educated entirely in regular classrooms increased nearly 20%).


52 See Christopher Murray, Clarifying Collaborative Roles in Urban High Schools: General Educators’ Perspectives, 36 Teaching Exceptional Children 44, 45 (2004).

Cross-training allows and encourages regular education teachers to assume their share of that responsibility.

More recently, increasing attention has also been focused on bringing aspects of regular education into special education preparation. The 2004 amendments to the IDEA, based on the No Child Left Behind Act (NCLB), increased emphasis on producing measurable gains in disabled students’ academic progress by requiring states to establish performance goals that match their definition of “adequate yearly progress” under NCLB. These amendments also intended to raise standards for special educators by defining what makes them “highly qualified,” but the resulting policies produced mixed results and did little to curb the “quick, alternative routes to the classroom [that] have proliferated over time.” Such reforms are incongruous; if students with disabilities are expected to come closer to meeting traditional academic standards, they must have special educators that know both “what students need to know about the content to learn it, and . . . how to represent content so that students CAN learn it.” Regular education coursework provides more thorough preparation in content knowledge (the former of the two concepts quoted in the previous sentence) that special educators can then pair with the unique pedagogical techniques students with disabilities require that they learn in special education courses.

To put it bluntly, the days when a regular education teacher could expect to teach only “normal” children are over. So too are the days when a special education teacher could satisfy her job requirements by simply keeping a disabled student quiet and occupied. Corey H. made

54 Jameson & Huefner, supra note 22, at 47.
55 Id. at 46.
56 See id. at 34-36.
57 Id. Under current law, one can become both “highly qualified” and licensed to teach special education by taking only a standardized test of special education concepts. Also, special education teachers whose students are held to alternate state achievement standards (generally indicating that their disabilities are severe) are only required to have subject matter knowledge appropriate to the level of instruction being provided.
58 Brownell, supra note 45.
an important first step in teacher certification reform by requiring Illinois regular education teachers to have a basic understanding of special education concepts. Other states should take this same step but then take one further to add regular education requirements to special education certificates. Such thorough, dual-discipline preparation could truly optimize curriculum instruction and collaboration between teachers.

*Cross-categorical certification*

After the enactment of EAHCA in 1975 sparked a flurry of scholarly activity and proposed reforms, educational researchers began to sing the praises of cross-categorical certification in the early 1980s, and the concept became so popular that it is now a part of most states’ teacher certification systems. ISBE implemented it primarily to end CPS’s segregatory practices, but it has other purposes and benefits. Teachers with this versatile background can provide varying types and levels of accommodations to students with disabilities who benefit from placement in a regular education room. However, other students with mild to moderate disabilities tend to have better outcomes in separate, cross-categorical classrooms, where teachers with this certification would also be appropriate. Hallahan and Kauffman argue that cross-categorical education makes sense for many mildly disabled students because they are likely to have highly similar academic and social performance deficits even if their disabilities fall into different categories. Also, given that disability definitions can be imprecise, particularly when the disability is mild or emotional/behavioral in nature, it is illogical to attempt to categorize students or their teachers according to such vague guidelines. Finally, students

62 *Id.* at 140.
with multiple disabilities need teachers who understand how different disabilities affect learning and interact with each other; cross-categorical teachers are the most likely to have this kind of knowledge. Because this type of certification is so adaptable to so many settings, states should absolutely create a cross-categorical certificate if they have not already.

Categorical Certificates

Categorical certificates were the norm in the beginning of the modern special education movement, from the 1950s through the early 1970s. However, with the advent of the LRE provision, they came under attack as stigmatizing, and proponents of the integration presumption made eliminating them in favor of cross-categorical certificates a top priority. As the previous section describes, cross-categorical certificates certainly have their place, but their popularity is as much a result of human resources crises as it is of validating research. Due to ever-increasing demand and a high attrition rate, schools have always struggled to fill special education positions, and states were thus eager to comply with demands for cross-categorical certificates because they allowed much greater hiring flexibility. Just as courts interpreted the LRE provision according to civil rights rhetoric instead of empirical evidence, state legislatures jumped on the cross-categorical bandwagon without considering the many instances when separate, single-disability education is the only educationally beneficial option.

Today, demands for categorical certification are driven not by antiquated, fear-based attitudes about disability, but by a better understanding of how significantly some disabilities can affect learning. As Colker asserted, some disabilities make receiving any educational benefit

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64 Brownell et al., supra note 53, at 359-60.
65 Hocutt and Alberg, supra note 60, at 200.
66 Brownell et al., supra note 53, at 361.
67 Brownell et al., supra note 53, at 368.
from even a modified regular education room largely impossible. Students with these disabilities often require intensive, one-on-one instruction from teachers highly trained in that particular disability in separate classrooms. Autism is the best example of such a disability.\(^{68}\) Most autism experts recommend Applied Behavior Analysis (ABA) as by far the most effective instructional method for students with moderate to severe autism because its one-on-one discrete trials teach students in simple, direct steps and reinforce positive behavior by immediately rewarding appropriate responses.\(^{69}\) However, ABA cannot be administered effectively in any kind of group setting; most students under this method are instructed at home or in a private facility. Thus, a placement with any sort of inclusion may not be appropriate for a student with autism. Even the social benefits of a more inclusive setting that could make a slightly lower educational benefit worthwhile in other situations may be less present for students with severe autism. In \textit{T.H. v. Board of Education}, the court held that a more restrictive placement was appropriate for a student with autism because he needed ABA to master basic language and behavior skills.\(^{70}\) Until these important skills were developed, the court felt that “group activities and interactions with other children [would be] of little . . . benefit.”\(^{71}\) Because some students require such rigorous, specialized instruction, categorical certificates must be available so that there are some teachers with focused training to meet their needs. States must not allow staffing concerns to completely govern their certification system to the exclusion of this necessary, and not necessarily discriminatory, option.

\(^{68}\) \textit{Id.} (similarly, students with dyslexia may require “intensive, explicit intervention in understanding how letter patterns and sounds are connected” to change brain functioning and alleviate learning deficits).


\(^{71}\) \textit{Id.}
A comprehensive teacher certification system can be the foundation of a special education program committed to educating students with disabilities as both individuals and part of the wider school community. Cross-training promotes the collaborative teaching and positive attitudes necessary for strong inclusive placements. Cross-categorical certification produces teachers that can meet the widely varied needs of students with mild, moderate, or multiple disabilities. Categorical certificates allow some special education teachers to become highly skilled in techniques geared solely toward the kinds of disabilities that make students unable to receive any meaningful academic or social benefit from more inclusive settings. Perhaps the biggest critique that can be made of Corey H. and Reid L. is that they both framed the issue incorrectly. By vetting the legality of single-disability certificates against cross-categorical certificates, they failed to see that both have a valid role to play in special education. States should strive to create a broader teacher certification system that focuses on facilitating cooperation between teachers and responding to the full spectrum of disability.

CONCLUSION

*Corey H.* is a landmark case in special education law because it called attention to the interaction between teacher certification and the LRE provision. To that end, it should be used to spur reform in other states and create a new generation of teachers equipped to staff the continuum of alternative placements Colker envisions. Its espousal of the integration presumption may have been the best solution for CPS, but the generalist, cross-categorical special education certificate it created threatened to deprive students in other Illinois districts of the more restrictive yet more effective education they needed. The lesson of *Corey H., Reid L.*, and Colker’s article is that the decision to put a child with disabilities in the most inclusive setting should be based on research supporting its benefits, not a moralistic argument that such
placement is important for the disability rights movement. To fight for the advancement of a
group at the cost of an individual child getting an education violates the IDEA’s demand for
individual consideration of students just as much as CPS did.

Teacher certification is an important part of ensuring compliance with the LRE provision,
but it is not a panacea for all LRE problems. Corey H. correctly characterized certification
reform as “one slice of a much bigger pie” of LRE remedies that should include other measures
like guidelines for monitoring local districts, and most of all proper funding of schools and
training initiatives. But by changing the way all teachers look at special education, teacher
certification reform has the potential to increase their dedication to special education reform in
general and build the momentum necessary to force lawmakers to consider other related
improvements.