



OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE

Marc Elrich  
County Executive

Tiffany Ward  
Director and Chief Equity Officer

MEMORANDUM

November 4, 2021

To: Jennifer Bryant, Director  
Office of Management and Budget

From: Tiffany Ward, Director  
Office of Racial Equity and Social Justice

Re: Supplemental Appropriation: High Quality Early Childhood Inclusion #22-24

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that Supplemental Appropriation #22-24 is likely to advance equity for prekindergarten students with disabilities and their families, but limitations in the data make it difficult to determine to what extent this supplemental will also advance racial equity. The creation of two inclusion coach positions brings Montgomery County Public Schools (MCPS) into further alignment with the vision laid out in the Individuals with Disabilities Education Act (IDEA), Part B, and will expand early childhood educational opportunities for children with disabilities. High-quality early childhood inclusion, as with other efforts to advance equity, will also create benefits for non-disabled early learners.
- II. **BACKGROUND:** Supplemental Appropriation #22-24 will provide \$251,233 to the MCPS FY22 Operating Budget to enhance services offered to prekindergarten students with disabilities in MCPS by expanding opportunities for inclusion in general education environments. The funds will support two positions, known as inclusion coaches, that will coordinate with prekindergarten teachers at ten schools with high enrollment of prekindergarten students with disabilities. The goal of this funding is aligned with the goals of the IDEA, Part B, “providing a free appropriate public education in the least restrictive environment for children with disabilities, ages 3 through 21.”<sup>1</sup>

---

<sup>1</sup> Individuals with Disabilities Education Act. State Formulas. Available at: <https://sites.ed.gov/idea/state-formula-grants/>

There is a well-documented and growing body of evidence supporting the inclusion of children with disabilities in general education early-learning/prekindergarten environments. A 2015 (rereleased in 2017) joint policy statement from the U.S. Department of Health and Human Services and U.S. Department of Education explains the legal, scientific, and social justice basis for expanding high-quality disability inclusion policies and practices in early childhood programs<sup>2</sup>. From “degrees of belongingness”<sup>3</sup> to accessing early childhood curriculum<sup>4</sup>, research points to a number of benefits of inclusion for early learners with disabilities. Specifically, spending more time in general education classes is linked to fewer days absent from school, higher reading and math test scores, higher probability of employment and higher earnings<sup>5</sup>.

Principles underlying inclusive high-quality early childhood opportunities are “access”, “participation”, and “support”<sup>6</sup>. As with other policy areas, advancing equity accrues benefits to all. Strategies that embody these principles create significant benefits for the academic, social, emotional, and physical well-being of students with disabilities as well as their non-disabled peers<sup>7</sup>.

Within the larger context of education equity, there are also concerns about the ways in which racial bias in education systems can lead to students of color being misidentified as needing special education, then being placed in more restrictive settings and experiencing harsher discipline—all linked to the intersectionality of race and special education<sup>8</sup>. A National Center for Learning Disabilities report cites research from the Century Foundation explaining that, “placement decisions that segregate students only work to exacerbate achievement gaps, as researchers have found that students in general education classrooms have better academic and employment outcomes than students placed in separate spaces”<sup>9</sup>.

---

<sup>2</sup> US Department of Health and Human Services and US Department of Education. Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs. Originally released September 14, 2015 (rereleased on January 5, 2017). Available at:

[https://www.acf.hhs.gov/sites/default/files/documents/ecd/policy\\_statement\\_on\\_inclusion\\_of\\_children\\_with\\_disabilities\\_in\\_early.pdf](https://www.acf.hhs.gov/sites/default/files/documents/ecd/policy_statement_on_inclusion_of_children_with_disabilities_in_early.pdf).

<sup>3</sup> Mary Beth Bruder, Ph.D. and Michael J. Guralnick, Ph.D. Administration for Community Living Blog. Why Early Childhood Inclusion Improves Outcomes for Children with Disabilities. September 17, 2015. Available at: <https://acl.gov/news-and-events/acl-blog/why-early-childhood-inclusion-improves-outcomes-children-disabilities>

<sup>4</sup> Readiness Matters: 2019-2020 Kindergarten Readiness Report. The Maryland State Department of Education and Ready at Five. March 2020. Available at:

[https://earlychildhood.marylandpublicschools.org/system/files/filedepot/4/200178\\_ready5\\_book\\_web.pdf](https://earlychildhood.marylandpublicschools.org/system/files/filedepot/4/200178_ready5_book_web.pdf)

<sup>5</sup> Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs.

<sup>6</sup> Wisconsin Department of Children and Families. What is Early Childhood Inclusion?. Available at: <https://dcf.wisconsin.gov/youngstar/eci/about>

<sup>7</sup> Readiness Matters: 2019-2020 Kindergarten Readiness Report.

<sup>8</sup> National Center for Learning Disabilities. Significant Disproportionality in Special Education: Current Trends and Actions for Impact. October 2020. Available at: [https://www.nclld.org/wp-content/uploads/2020/10/2020-NCLD-Disproportionality\\_Trends-and-Actions-for-Impact\\_FINAL-1.pdf](https://www.nclld.org/wp-content/uploads/2020/10/2020-NCLD-Disproportionality_Trends-and-Actions-for-Impact_FINAL-1.pdf)

<sup>9</sup> Significant Disproportionality in Special Education: Current Trends and Actions for Impact.

Despite the guarantees of IDEA, Part B there are still many students with disabilities and families in the US that experience barriers to accessing inclusive high-quality early childhood programs and “too many preschool children with disabilities are only offered the option of receiving special education services in settings separate from their peers without disabilities.”<sup>10</sup> Further, some Critical Disability Studies scholars suggest that existing definitions of ‘inclusion’ used to encourage disability-inclusive classrooms are limited, and that the real aim should not stop at enhancing inclusion strategies but should aim to “detect, understand and dismantle exclusion as it presents itself in education”<sup>11</sup>. While full exploration of this critique is beyond the scope of this racial equity impact assessment, it is useful to view early childhood disability inclusion as an important, but intermediary step towards creating truly equitable and socially just educational opportunities for children with disabilities.

In Maryland, a lack of inclusion has contributed to disparities in kindergarten readiness<sup>12</sup> among students with disabilities. The 2019-2020 Readiness Matters Report for Maryland shows disparities across all domains of readiness between children with and without disabilities, reporting that 19% of kindergarteners with a disability demonstrated readiness, compared to 50% of their non-disabled peers<sup>13</sup>. The disparities are similar to those experienced by Black and Hispanic children—42% and 26% respectively demonstrated readiness, while 60% of White kindergartners demonstrated readiness<sup>14</sup>. Montgomery County 2019 data show that 12% of children with identified disabilities demonstrated kindergarten readiness compared to 58% of children without disabilities<sup>15</sup>, this gap is wider than it is at the state level<sup>16</sup>.

Expansion of high-quality inclusive educational opportunities is the responsibility of federal, state and local early learning policies and systems. At the local level, special attention is given to building the capacity of staff and ensuring they have “competencies in culturally and linguistically responsive practice, and positive attitudes and beliefs about inclusion and disability” along with “a strong understanding of universal design and universal design for learning”<sup>17</sup>. There are a variety of staff development approaches; inclusion coaches are

---

<sup>10</sup> Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs.

<sup>11</sup> Nicole Eilers. Critical Disability Studies and ‘Inclusive’ Early Childhood Education: The Ongoing Divide. *Journal of Disability Studies in Education*. July 2020. Available at: [https://brill.com/view/journals/jdse/1/1-2/article-p64\\_64.xml?language=en#d22851984e813](https://brill.com/view/journals/jdse/1/1-2/article-p64_64.xml?language=en#d22851984e813). Original quote referenced is from Slee, R. (2013). How do we make inclusive education happen when exclusion is a political predisposition? *International Journal of Inclusive Education*, 17(8), 895–907.

<sup>12</sup> The Kindergarten Readiness Assessment (KRA) is a developmentally appropriate assessment tool administered to incoming kindergarteners that measures school readiness across four learning domains. Administered by kindergarten teachers at the beginning of the school year, the KRA looks at the knowledge, skills, and behaviors necessary to be successful in kindergarten. For more information, see about the KRA: <https://dataexplorer.readyatfive.org/#/main>

<sup>13</sup> Readiness Matters: 2019-2020 Kindergarten Readiness Report.

<sup>14</sup> Readiness Matters: 2019-2020 Kindergarten Readiness Report.

<sup>15</sup> 2019 Maryland Kindergarten Readiness Data. Subgroup Demographics & Readiness. Available at: <https://dataexplorer.readyatfive.org/#/main/county/Montgomery>

<sup>16</sup> 2019 Maryland Kindergarten Readiness Data. Compare Readiness by Subgroup. Available at: <https://dataexplorer.readyatfive.org/#/main/compare-subgroup>

<sup>17</sup> Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs.

referenced in state level strategies for California and Minnesota<sup>18</sup>. In Montgomery County, the proposed inclusion coaches will consult with staff members and provide job-embedded coaching to both special and general education teachers and paraeducators on strategies and accommodations that will enable students to access the curriculum and school environment.

III. **DATA ANALYSIS:** The 42<sup>nd</sup> annual Report to Congress on the Individuals with Disabilities Education Act<sup>19</sup> contains data about who is served under IDEA at the state level, including the education settings of 3–5-year-old children served in Maryland under Part B. Based on available data, 6.6% of 3–5-year-old children in Maryland were served by IDEA, Part B in 2018, this is up from 5.6% in 2009.

The racial/ethnic makeup of 3–5-year-old students served under IDEA, Part B, in Maryland, 2018 is as follows:

American Indian or Alaska Native	Asian	Black or African American	Hispanic /Latino	Native Hawaiian or Other Pacific Islander	White	Two or more Races
9.3%	6.9%	7.1%	6.7%	13.7%	6.4%	5.3%

**Source:** U.S. Department of Education. 42nd Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act. 2020. Available at: <https://sites.ed.gov/idea/files/42nd-arc-for-idea.pdf> Exhibit 59.

The distribution of educational settings for the 3-5-year-old students served under IDEA, Part B in Maryland, 2018 is as follows:

Educational environment	Percentage of children ages 3 through 5 served under IDEA, Part B	Percentage of children ages 3 through 5 served under IDEA, Part B who are English Language Learners
At least 10 hours per week and majority	52.9%	57.3%
At least 10 hours per week, majority elsewhere	6.6%	4.1%
Less than 10 hours per week and majority	6.7%	3.1%

<sup>18</sup> Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs.

<sup>19</sup> U.S. Department of Education. 42nd Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act. 2020. Available at: <https://sites.ed.gov/idea/files/42nd-arc-for-idea.pdf>

Educational environment	Percentage of children ages 3 through 5 served under IDEA, Part B	Percentage of children ages 3 through 5 served under IDEA, Part B who are English Language Learners
Less than 10 hours per week, majority elsewhere	4.1%	1.1%
Separate class	18.1%	24.1%
Separate school	2.0%	0.6%
Residential Facility	Percentage was non-zero but less than 0.05	0.0%
Home	.4%	0.6%
Service provider location	9.1%	9.0%

**Source:** U.S. Department of Education. 42nd Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act. 2020. Available at: <https://sites.ed.gov/idea/files/42nd-arc-for-idea.pdf> Exhibit 60 and 61.

This data is useful in understanding the current scope of early childhood disability inclusion at the state level—more than half of students ages 3-5 served by IDEA, Part B are engaged in a regular early childhood program; the same is true for English Language Learners. The data at the County-level reveals a different picture. According to information provided at the time of this analysis, the percentage of students with disabilities aged 3-kindergarten served in regular early childhood settings the majority of the day was 36.92%. The target for Montgomery County was 65.10%. Using comparable state-level data (highlighted above), the percentage of children 3-5 served under IDEA, Part B in regular education environments was 52.9%. The gap between the state and county on this metric demonstrates how existing activities in Montgomery County cannot be considered totally inclusive or having achieved free appropriate public education in the least restrictive environment for prekindergartners with disabilities. Monitoring and shrinking this gap, paying particular attention to potential racial and ethnic disparities, will help determine whether strategies in addition to inclusion coaches are necessary. Data provided at the time of this analysis include the demographic composition of prekindergarten students with disabilities who will be served in the 14 schools and centers included in the grant. Data about the entire population of prekindergarten students with disabilities, disaggregated by race (across each of the 14 schools and centers) was not available at the time of this analysis.

**Racial or ethnic composition of students with disabilities in Head Start/pre-K classrooms (general education classrooms)**

Demographic group	Number of prekindergarten students with disabilities in general education classrooms	% of prekindergarten students with disabilities in general education classrooms
Asian	151	13.8%
Black/African American	376	34.3%
Hispanic/Latino	379	34.6%
Two or more races	51	4.7%
White	139	12.7%
Total	1096	100.0%

**Source:** Data provided in MCPS response to REIA inquiry.

This data show that more than two-thirds of students with disabilities who will now be integrated into general education classrooms are Black or Latino. However, because there isn't data about the total population of prekindergartners with disabilities disaggregated by race/ethnicity, ORESJ cannot determine whether the above distribution by race/ethnicity is proportional or comparable to the racial/ethnic composition of the overall population of prekindergarten students with disabilities (particularly in the 14 schools and centers related to this grant). We, therefore, cannot determine whether expanded inclusion of prekindergarten students with disabilities in general education classes is also racially equitable. If these data were available, and indicated a racial or ethnic disproportionality, further inquiry would be needed to determine whether the disproportionality reflects the complexity of inequities facing students of color with disabilities and their families and is therefore an example of increased access, or whether the disproportionality is a result of potential misplacement (as discussed in the background section).

It is important to note that available data do not speak to the experiences of prekindergarten students with disabilities, and therefore no conclusions can be drawn about baseline or existing levels of inclusion for prekindergarten students with disabilities. Collecting and tracking this type of qualitative data can strengthen practitioners' understanding of whether general education placement and inclusion coach interventions are resulting in experiences of greater inclusion for prekindergarten students with disabilities, particularly those of color who because of racial inequities experience additional barriers to educational opportunity.

cc: Ken Hartman, Director, Strategic Partnerships, Office of the County Executive  
Dr. Monifa McKnight, Interim Superintendent, Montgomery County Public Schools