

A Comparative Study of Inclusive Education for Learners with Intellectual Disabilities in Kenya and New York State: Implications for Kenya

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ABSTRACT

Inclusive education for learners with intellectual disabilities remains one of the most demanding areas of education reform because it requires more than policy commitment. It requires early identification, reasonable accommodation, individualized support, appropriate placement, sustained financing, and clear transition pathways. This paper compares Kenya's inclusive education framework with New York State's accountability-based special education system to draw context-sensitive implications for Kenya. The study used a comparative documentary policy analysis supported by a structured review of official policy documents, administrative reports, and scholarly sources published mainly between 2018 and 2024. It examined how legal frameworks, placement systems, financing arrangements, assessment mechanisms, and monitoring practices influence access, progression, and transition outcomes for learners with intellectual disabilities. The findings show that Kenya has made important formal commitments to inclusive education, but implementation remains weakened by fragmented assessment systems, limited support capacity, inadequate placement data, and severe transition bottlenecks. Official Kenyan statistics recorded 71,851 primary-level learners under the historical administrative category "Mentally Handicap" in public special-needs institutions in 2019, but no corresponding enrolment under the same category at secondary level (Ministry of Education, 2019). New York State, by contrast, provides more routine placement and outcome indicators through the least restrictive environment accountability framework, including a 2020 baseline in which 58.28% of students with individualized education programs were educated in regular classes for at least 80% of the school day (New York State Education Department, 2022a). The paper argues that Kenya can strengthen inclusive education for learners with intellectual disabilities by developing a national placement-and-outcomes dashboard, improving assessment and support systems, clarifying financing mechanisms, and treating transition from primary to secondary education as a monitored system priority.

Keywords: inclusive education; intellectual disability; Kenya; New York State; least restrictive environment; special needs education; transition.

INTRODUCTION

Inclusive education has become a central global commitment in education reform, particularly in relation to learners with disabilities. The Convention on the Rights of Persons with Disabilities affirms the right of persons with disabilities to inclusive education, while General Comment No. 4 clarifies that inclusion is not achieved merely by placing learners with disabilities in regular classrooms. Rather, education systems must be adapted through reasonable accommodation, individualized support, accessible learning environments, and structural reforms that allow learners with disabilities to participate meaningfully and progress through school (United Nations, 2006; United Nations Committee on the Rights of Persons with Disabilities, 2016). This rights-based understanding is important for learners with intellectual disabilities because they often require sustained instructional adaptation, specialized support, flexible assessment, and carefully planned transitions across levels of education.

Kenya has made significant policy commitments to inclusive education. The Sector Policy for Learners and Trainees with Disabilities recognizes inclusive education as a guiding principle and identifies intellectual disability as one of the disability categories requiring specific attention within the education system (Ministry of Education, 2018). However, the main challenge in Kenya is no longer simply the absence of inclusive education policy. The deeper problem lies in the gap between policy commitment and implementation. Learners with intellectual disabilities continue to face serious barriers in identification, placement, learning support, progression, and transition from primary to secondary education.

The urgency of this problem is reflected in official Kenyan statistics. The Sector Policy for Learners and Trainees with Disabilities cites a national survey estimating disability prevalence among persons aged 3–21 years at 11.4%. The same policy notes that learners with intellectual disabilities constituted 44% of learners with special needs at primary level but only 13% at secondary level, raising concern about what happens to these learners after primary education (Ministry of Education, 2018). The 2019 Basic Education Statistical Booklet presents an even sharper transition concern. In public special-needs primary institutions, 71,851 learners were recorded under the historical administrative category “Mentally Handicap,” which is treated in this study as the closest available official proxy for intellectual disability. However, the same category recorded no corresponding enrolment at the secondary level, while learners with some other disability categories remained visible in secondary-level statistics (Ministry of Education, 2019). This pattern suggests a severe transition bottleneck rather than a simple enrolment fluctuation.

This paper therefore examines Kenya as a case where inclusive education is strongly expressed in policy but remains weakly supported by implementation systems. The available evidence suggests that many learners with intellectual disabilities are at risk of being excluded, retained in segregated structures, or lost during transition from primary to secondary education. These challenges are linked to under-resourced Educational Assessment and Resource Centres, uneven teacher preparedness, limited individualized support, weak monitoring systems, stigma, and continued reliance on special schools and units even as policy language increasingly promotes inclusion (Ministry of Education, 2018). Recent fiscal reporting also shows that Kenya continues to invest in special-needs education, but the sector still faces pressure related to resource adequacy, capitation, staffing, equity of access, and broader system reform needs (Kenya National Treasury, 2024).

Against this background, the most important question is not whether Kenya has adopted inclusive education in principle, but whether the education system provides learners with intellectual disabilities with a realistic and supported pathway from access to progression and completion. This study addresses that question through a comparative analysis of Kenya and New York State. New York State is not used as a socioeconomic equivalent to Kenya, but as a data-rich policy-learning case. Its special education system operates within the federal Individuals with Disabilities Education Act and uses the least restrictive environment framework to monitor placement patterns and outcomes for learners with disabilities (U.S. Department of Education, n.d.; New York State Education Department, 2022a). The comparison is therefore intended to draw practical lessons on how Kenya can strengthen placement reporting, transition monitoring, support systems, and accountability for learners with intellectual disabilities.

1.1 Why New York State?

New York State was selected as a comparator not because it is socially, economically, or institutionally similar to Kenya, but because it provides a useful policy-learning case for examining how inclusive education can be translated into measurable accountability indicators. Its special education system operates within the United States federal Individuals with Disabilities Education Act, particularly the least restrictive environment requirement, which expects learners with disabilities to be educated with their non-disabled peers to the maximum extent appropriate (U.S. Department of Education, n.d.). This makes New York State relevant to the present study because it demonstrates how inclusion can be monitored through placement, progression, graduation, dropout, and transition indicators rather than through policy commitment alone.

The value of New York State as a comparator lies in its reporting culture. Unlike Kenya, where national public reporting does not yet provide a stable least restrictive environment-style placement distribution for learners with intellectual disabilities, New York reports standardized statewide indicators through the State Performance Plan

and Annual Performance Report framework. For example, in its 2020 baseline for the 2020–2025 reporting cycle, New York reported that 58.28% of students with individualized education programs were educated in regular classes for at least 80% of the school day, while 18.16% were in regular classes for less than 40% of the school day and 5.14% were in separate schools, residential facilities, homebound, or hospital placements (New York State Education Department, 2022a). These indicators make placement patterns visible and allow policymakers to monitor whether learners with disabilities are being educated in more or less restrictive environments.

This does not mean that New York State has fully resolved the inclusion of learners with intellectual disabilities. Evidence from the broader United States context shows that learners with intellectual disabilities remain among the groups less likely to spend most of the school day in general education classrooms compared with learners in some other disability categories (National Center for Education Statistics, 2024). Nevertheless, New York State remains useful for this study because it shows how inclusive education can be supported by public reporting, measurable targets, compliance monitoring, and transition accountability. The comparison therefore does not propose direct imitation of New York’s legal or funding model. Instead, it examines what Kenya can learn from a system where inclusion is made administratively visible through routine placement and outcome indicators.

1.2 Purpose, Research Questions, and Contribution

The purpose of this study was to compare how inclusive education for learners with intellectual disabilities is framed, implemented, and monitored in Kenya and New York State, and to draw practical implications for strengthening Kenya’s inclusive education system. The study focused on intellectual disability because official Kenyan statistics suggest that this group experiences one of the most severe progression and transition bottlenecks within special-needs education. While Kenya has adopted inclusive education as a policy principle, available administrative data show that many learners with intellectual disabilities remain weakly supported beyond primary education (Ministry of Education, 2018, 2019).

The study was guided by three research questions. First, how do Kenya and New York State conceptualize and operationalize inclusive education for learners with intellectual disabilities? Second, what do the best available official indicators reveal about enrolment, placement, progression, and transition in the two systems? Third, what implementation lessons can Kenya draw from New York State’s data-rich accountability approach without assuming that the two systems are directly equivalent?

The contribution of the study lies in connecting comparative policy analysis with the practical problem of transition for learners with intellectual disabilities in Kenya. Rather than treating inclusive education only as a legal or philosophical commitment, the paper examines whether the education system produces visible pathways for identification, placement, support, progression, and transition. It argues that Kenya’s next stage of inclusive education reform should move beyond broad policy statements toward measurable implementation tools, including a placement-and-outcomes dashboard, stronger assessment and support systems, clearer financing logic, and monitored transition pathways.

1.3 Significance

This study is significant because it addresses a critical but under-examined issue in Kenya’s inclusive education reform: the progression of learners with intellectual disabilities from primary to secondary education. Existing policy documents recognize inclusive education as a national priority, but official statistics continue to show a sharp decline in the visibility of learners with intellectual disabilities at higher levels of schooling (Ministry of Education, 2018, 2019). By focusing on this transition concern, the study highlights a practical implementation gap that may remain hidden when inclusion is discussed only in terms of access or policy commitment.

The study is also significant for policy practice. It shows that Kenya’s inclusive education agenda requires stronger systems for tracking where learners with disabilities are placed, what support they receive, whether they progress across school levels, and what outcomes they achieve. The comparison with New York State demonstrates that inclusive education becomes easier to improve when it is supported by routine data, public

reporting, and accountability indicators. For Kenya, this lesson is especially important because the current evidence base is still stronger on institutional enrolment than on placement, classroom participation, transition, and completion outcomes.

Finally, the study contributes to comparative education scholarship by using New York State as a bounded policy-learning case rather than as a model to be copied. This distinction is important because Kenya and New York State differ substantially in resources, governance arrangements, legal traditions, and data infrastructure. The value of the comparison therefore lies not in transferring an entire system, but in identifying adaptable implementation principles. These include transparent placement reporting, monitored transition planning, learner-centered support, and phased reforms that are realistic within Kenya's fiscal and administrative context.

METHODOLOGY

2.1 Study Design

This study adopted a comparative documentary policy analysis supported by a structured review of official and scholarly sources. This design was appropriate because the study examined inclusive education as a policy and implementation issue rather than as an intervention whose effects could be tested experimentally. The focus was on how Kenya and New York State define, organize, finance, monitor, and report inclusive education for learners with intellectual disabilities. The design therefore allowed the study to compare policy frameworks, administrative data, placement indicators, transition signals, and accountability mechanisms across two education systems.

A structured documentary review was used because the evidence base included different types of sources, including policy documents, government reports, statistical booklets, legal frameworks, accountability reports, and peer-reviewed literature. This approach was suitable for synthesizing diverse evidence while maintaining transparency in source selection, extraction, and interpretation. Integrative and structured evidence synthesis approaches are useful where the evidence is heterogeneous and where the research aim is to interpret policy, practice, and implementation patterns rather than estimate a single intervention effect (Whittemore & Knafl, 2005; Munn et al., 2018). The study therefore did not treat Kenya and New York State as directly equivalent systems. Instead, it used New York State as a bounded policy-learning comparator for identifying implementation principles that may be adapted to Kenya's context.

2.2 Search Strategy and Source Hierarchy

The review prioritized official and primary sources published between 2018 and 2024, although older methodological and normative sources were included where necessary. For Kenya, the main sources were the *Sector Policy for Learners and Trainees with Disabilities*, the *Implementation Guidelines for Sector Policy for Learners and Trainees with Disabilities*, the *Basic Education Statistical Booklet 2019*, and the *Education Sector Report 2024* (Ministry of Education, 2018, 2019; Kenya National Treasury, 2024). These sources were selected because they provide the clearest available official information on disability education policy, enrolment, institutional provision, financing, and implementation priorities in Kenya.

For New York State, the study relied mainly on official special education accountability materials, including the State Performance Plan and Annual Performance Report documents, least restrictive environment indicator materials, and Part B results-driven accountability reports (New York State Education Department, 2022a, 2022b). Federal sources from the United States Department of Education and the National Center for Education Statistics were used to clarify the legal and statistical context of special education under the Individuals with Disabilities Education Act (U.S. Department of Education, n.d.; National Center for Education Statistics, 2024). International normative sources, particularly the Convention on the Rights of Persons with Disabilities and General Comment No. 4 on inclusive education, were used to frame inclusive education as a rights-based obligation rather than a discretionary policy preference (United Nations, 2006; United Nations Committee on the Rights of Persons with Disabilities, 2016).

The search was conducted through Google Scholar, official government websites, institutional repositories, and intergovernmental databases. Search terms included “inclusive education,” “intellectual disability,” “special needs education Kenya,” “learners with disabilities Kenya,” “least restrictive environment,” “New York State special education,” “State Performance Plan Annual Performance Report,” “secondary transition,” and “disability education policy.” Official policy and administrative sources were given priority because the study aimed to compare implementation architecture and accountability systems. Peer-reviewed literature was used to support conceptual framing, methodological justification, and interpretation, but it did not replace official statistics.

2.3 Inclusion and Exclusion Criteria

Sources were included if they met at least one of four criteria. First, they had to provide official policy guidance on inclusive education, disability education, or special-needs education. Second, they had to provide administrative data on enrolment, placement, disability categorization, transition, financing, or outcome indicators. Third, they had to present legal or accountability requirements relevant to inclusive education and least restrictive environment implementation. Fourth, they had to be peer-reviewed or methodologically relevant sources that helped explain structured evidence synthesis or the conceptual interpretation of inclusive education for learners with intellectual disabilities.

Sources were excluded if they were undated, not clearly linked to Kenya, New York State, the United States federal special education framework, or international disability-rights standards. Opinion-based materials were also excluded where they lacked policy, empirical, legal, or administrative relevance. Broad disability sources were used only where they directly informed the narrower focus on learners with intellectual disabilities or inclusive education implementation. This selection process helped maintain focus and reduced the risk of drawing conclusions from sources that were not comparable or sufficiently relevant to the study’s purpose.

2.4 Data Extraction, Harmonisation, and Comparative Logic

Data were extracted from each source using five guiding dimensions: definition of inclusion, disability categorization, placement or enrolment indicators, transition or outcome signals, and implementation constraints. These dimensions were selected because they directly reflected the study’s purpose of comparing how inclusive education is framed, operationalized, monitored, and translated into outcomes for learners with intellectual disabilities.

Because Kenya and New York State do not report disability education data in identical formats, the study used a cautious harmonisation approach. In Kenya, the 2019 *Basic Education Statistical Booklet* used the historical administrative category “Mentally Handicap.” This term is outdated and is not used as preferred scholarly language in the present study. However, it was retained in quotation marks where necessary because it appears in the official statistical source and served as the closest available administrative proxy for intellectual disability in that dataset (Ministry of Education, 2019). In New York State, the most visible official indicators were not organized around the same category-specific format. Instead, they were mainly reported through least restrictive environment placement indicators, graduation, dropout, transition compliance, and broader special education accountability measures (New York State Education Department, 2022a, 2022b).

The comparison was therefore not treated as a direct statistical equivalence between two identical systems. Rather, it was treated as a limited policy-learning comparison. Kenya was examined as a national system with strong inclusive education commitments but incomplete public visibility of placement and transition outcomes for learners with intellectual disabilities. New York State was examined as a subnational system operating within a federal special education accountability framework that makes placement and outcome indicators more publicly measurable. The purpose of the comparison was not to suggest that Kenya should copy New York State’s legal, fiscal, or institutional model. Instead, it was to identify adaptable implementation principles, especially public placement reporting, transition monitoring, learner support accountability, and the use of measurable indicators to track inclusive education progress.

2.5 Limitations

The study had three main limitations. First, the comparison was affected by differences in how Kenya and New York State report disability education data. Kenya's publicly available statistics emphasize special-needs institutions, enrolment categories, and disability classifications, while New York State reports more detailed placement and outcome indicators through the least restrictive environment and special education accountability framework. This means that some aspects of the comparison were based on direct policy comparison, while others relied on proxy indicators.

Second, Kenya's publicly available data on learners with intellectual disabilities in regular classrooms remain limited. As a result, the study could not fully trace how many learners with intellectual disabilities are placed in regular schools, integrated units, special schools, or home-based education across all counties. The analysis therefore relied on the best available official sources, particularly special-needs enrolment and transition signals, while recognizing that these sources do not provide a complete national picture of inclusive placement.

Third, the study was documentary and did not include field-based empirical validation. It did not collect interviews from learners, parents, teachers, Educational Assessment and Resource Centre officers, school administrators, or Ministry of Education officials. It also did not include classroom observations or county-level field verification. This limitation does not invalidate the policy analysis, but it means that the findings should be interpreted as a documentary and administrative evidence synthesis rather than as a study of lived experiences or causal effects. Future research should therefore include field-based evidence from learners with intellectual disabilities, families, teachers, assessment officers, and policymakers to validate how inclusive education policies are experienced and implemented in practice.

KENYA CASE

3.1 Disability Prevalence and Exclusion Pressure

Official policy and administrative records in Kenya indicate that learners with intellectual disabilities experience significant exclusion pressure across the education continuum. The *Sector Policy for Learners and Trainees with Disabilities* cites a national survey that estimated disability prevalence among persons aged 3–21 years at 11.4%. The same policy further reports that learners with intellectual disabilities constituted 44% of learners with special needs at primary level but only 13% at secondary level (Ministry of Education, 2018). This sharp reduction suggests that the main challenge is not only access to schooling, but also retention, progression, and transition beyond primary education.

The available evidence therefore points to a weak progression pathway for learners with intellectual disabilities. Although Kenya has formally adopted inclusive education as a policy principle, the data suggest that learners with intellectual disabilities are more likely to be lost within the system before reaching secondary education. This makes intellectual disability a particularly important category for examining the relationship between policy commitment and actual implementation. In this respect, Kenya's challenge is not simply whether learners are initially identified or enrolled, but whether the education system can support them consistently from entry to completion.

3.2 Policy and Institutional Architecture

Kenya's inclusive education policy framework is progressive in principle. The *Sector Policy for Learners and Trainees with Disabilities* identifies inclusive education as a guiding principle and recognizes that learners with disabilities should receive reasonable accommodation, relevant support services, and opportunities for progression across education levels (Ministry of Education, 2018). The policy also acknowledges different placement arrangements, including regular schools, integrated units, special schools, special units, and home-based education programmes. This shows that Kenya's policy framework recognizes the diversity of learner needs and does not treat disability education as a single uniform pathway.

However, the implementation architecture remains uneven. Kenya continues to rely on a mixed system involving regular institutions, integrated units, special schools, and Educational Assessment and Resource Centres. The implementation guidelines emphasize access, retention, progression, transition, qualified personnel, relevant resources, and support services as core requirements for learners with disabilities (Ministry of Education, 2018). These provisions show that the state has identified the major components needed for inclusion, but the persistence of transition gaps suggests that these components are not yet sufficiently coordinated or resourced. The main policy challenge is therefore not the absence of an inclusive education framework, but the limited capacity to translate that framework into consistent support for learners with intellectual disabilities.

3.3 Enrolment and Placement Patterns

The *Basic Education Statistical Booklet 2019* provides one of the clearest official pictures of Kenya's special-needs education enrolment patterns. It shows that public special-needs primary enrolment increased from 108,221 learners in 2017 to 136,081 learners in 2019, while public special-needs secondary enrolment increased only slightly from 4,019 to 4,794 learners during the same period (Ministry of Education, 2019). This difference indicates that special-needs provision is much more visible at primary level than at secondary level.

The most significant concern relates to learners recorded under the historical administrative category "Mentally Handicap." This term is outdated and is used here only because it appears in the official 2019 statistical source. In 2019, the booklet recorded 71,851 learners in this category at primary level, but no corresponding enrolment under the same category at secondary level (Ministry of Education, 2019). The same source noted that learners with mental and multiple disabilities rarely transitioned to secondary schools. This is one of the strongest official indicators that learners with intellectual disabilities face a serious progression bottleneck in Kenya's education system.

These enrolment patterns also reveal a wider data problem. Kenya's public statistics provide useful information on special-needs institutions and disability categories, but they do not yet provide a comprehensive national picture of where learners with intellectual disabilities are placed across regular classrooms, integrated units, special schools, or home-based education. As a result, the system can identify a transition problem, but it cannot yet fully trace the learner pathway that produces that problem. This weakens planning, financing, and accountability for inclusive education.

3.4 Transition Bottlenecks from Primary to Secondary

The transition gap for learners with intellectual disabilities should be understood as a system-level concern rather than a simple statistical irregularity. When the largest disability-related category at primary level almost disappears at secondary level in official special-needs statistics, the implication is that many learners are not being supported into viable post-primary pathways. This suggests weaknesses in assessment continuity, curriculum adaptation, placement planning, family support, school readiness, and the availability of appropriate secondary-level options.

The *Sector Policy for Learners and Trainees with Disabilities* supports this interpretation by identifying several constraints affecting quality and relevant learning for learners with disabilities. These include inadequate guidelines, unreliable information on learners with disabilities, inappropriate infrastructure, limited facilities and equipment, and insufficient support within both regular and special institutions (Ministry of Education, 2018). For learners with intellectual disabilities, such constraints are especially serious because successful transition often requires individualized planning, functional learning pathways, adapted assessment, and sustained support from both schools and families.

The evidence therefore suggests that transition should be treated as a core inclusive education indicator in Kenya. If learners with intellectual disabilities are visible at primary level but largely absent from secondary-level statistics, then inclusive education cannot be evaluated only by enrolment or policy presence. It must also be assessed by whether learners are progressing from one level to the next with appropriate support.

3.5 Financing, Staffing, and Implementation Capacity

Recent fiscal reporting shows that Kenya has continued to allocate resources to special-needs education, but the structure of support remains under pressure. The *Education Sector Report 2024* indicates continued investment in special-needs education, including enrolment support for learners in special-needs primary schools, special schools, special secondary schools, and integrated secondary schools (Kenya National Treasury, 2024). These allocations confirm that the state has not ignored disability education. However, they also show that much of the visible financing remains organized around special-needs and special-school structures rather than a fully developed national inclusion-support system.

The financing challenge is closely linked to staffing and support capacity. Inclusive education for learners with intellectual disabilities requires trained teachers, functional assessment services, learner support assistants, adapted instructional materials, assistive resources, and effective follow-up mechanisms. Kenya's policy framework already recognizes many of these requirements, but the persistence of weak transition outcomes suggests that implementation capacity remains inadequate (Ministry of Education, 2018; Kenya National Treasury, 2024). In practice, learners with intellectual disabilities may be identified at primary level, but without sufficient secondary-level support, funding, teacher preparation, and transition planning, their progression remains fragile.

Overall, the Kenya case shows a clear tension between policy commitment and implementation capacity. Kenya has developed an inclusive education policy framework and continues to invest in special-needs education, but learners with intellectual disabilities still face weak visibility, limited support continuity, and severe transition barriers. The strongest lesson from the Kenya evidence is that inclusive education cannot be measured only by the presence of policies or special-needs enrolment. It must be measured by whether learners with intellectual disabilities are supported to progress, transition, and complete meaningful education pathways.

NEW YORK STATE CASE

4.1 Legal and Operational Framework

New York State implements inclusive education within the United States federal special education framework, particularly the Individuals with Disabilities Education Act. A central requirement under this framework is the least restrictive environment principle, which requires learners with disabilities to be educated with their non-disabled peers to the maximum extent appropriate. Removal from regular classes, separate schooling, or other restrictive placements should occur only when education in regular classes cannot be achieved satisfactorily even with supplementary aids and services (U.S. Department of Education, n.d.).

This legal framework is important because it turns inclusion into an operational and measurable responsibility. New York State does not rely only on broad policy statements about inclusion. Instead, it reports placement patterns through accountability indicators that show the extent to which learners with disabilities are educated in regular classrooms or more restrictive settings. This makes New York State useful as a policy-learning comparator for Kenya because it demonstrates how an inclusive education commitment can be linked to routine reporting, measurable targets, and system monitoring (New York State Education Department, 2022a).

The relevance of New York State to this study is therefore not that it represents a perfect or directly transferable model. Rather, it provides an example of how inclusion can be made administratively visible. While Kenya's reporting is still largely organized around special-needs institutional enrolment and disability categories, New York's framework gives greater attention to where learners are placed, how restrictive those placements are, and whether learners progress toward graduation and transition outcomes.

4.2 Placement Patterns and LRE Indicators

New York State uses least restrictive environment indicators to monitor the placement of school-age students with individualized education programs. In the 2020 baseline for the 2020–2025 reporting cycle, New York reported that 58.28% of students with individualized education programs were educated in regular classes for at

least 80% of the school day. Another 18.16% were educated in regular classes for less than 40% of the school day, while 5.14% were placed in separate schools, residential facilities, homebound instruction, or hospital settings (New York State Education Department, 2022a). These figures provide a clear public measure of how inclusive or restrictive special education placements are across the state.

The importance of these indicators is not only in the percentages themselves, but in the accountability logic behind them. By reporting the proportion of learners in different educational environments, New York makes it possible to assess whether the system is moving learners toward less restrictive settings where appropriate. This kind of reporting also allows policymakers to identify whether inclusion is improving over time or whether learners remain concentrated in more restrictive placements.

Federal statistics further show the scale of New York's special education system. In the 2022–23 school year, New York served 524,993 children aged 3–21 under the Individuals with Disabilities Education Act, representing about 21% of public school enrolment in the state (National Center for Education Statistics, 2024). This level of administrative visibility is important because it allows placement and outcome trends to be monitored across a large special education population. For Kenya, the lesson is not the size of the system, but the value of having a stable public reporting framework that can show where learners with disabilities are educated and whether the system is becoming more inclusive.

4.3 Outcome and Transition Accountability

New York State's accountability structure extends beyond placement. It also monitors outcomes such as graduation, dropout, evaluation timelines, and secondary transition planning. According to the 2022 Part B Results-Driven Accountability Matrix for New York, 76% of children with disabilities left high school with a regular diploma, while 12% dropped out. The same accountability framework reported 91.01% performance on the secondary transition indicator, which measures whether transition planning requirements are reflected in students' individualized education programs (New York State Education Department, 2022b).

This outcome orientation is one of the strongest points of contrast with Kenya. In Kenya, the transition challenge for learners with intellectual disabilities is mainly inferred from the sharp drop between primary and secondary special-needs statistics. In New York State, transition is treated as a formal accountability area that must be monitored and reported. This distinction matters because problems that are directly measured are more likely to become visible to policymakers, schools, and the public.

New York State still faces inclusion challenges, particularly because learners with intellectual disabilities are often more likely than some other disability groups to experience restrictive placements. However, the system has stronger tools for identifying, reporting, and responding to such challenges. The central lesson for Kenya is therefore not that New York has solved inclusive education, but that it has made placement and transition measurable. Kenya's inclusive education system would be strengthened if progression and transition outcomes for learners with intellectual disabilities were similarly tracked through routine public indicators.

4.4 New York City as an Illustrative Subcase

New York City is useful only as an illustrative subcase because it shows how annual reporting can support monitoring at a local level. It should not be treated as a separate comparator to Kenya. In the 2022–2023 school year, New York City Public Schools reported 28,202 initial preschool special education referrals, with 87% of students having individualized education program meetings within compliance timelines. The report also indicated that recommendations to special classes had decreased to 39%, while 42% of students with disabilities were enrolled in 3-K and Pre-K programmes (New York City Public Schools, 2023).

The value of this example lies in the reporting practice rather than in the specific preschool percentages. It shows how education systems can track referrals, compliance timelines, placement recommendations, and participation in less restrictive programmes over time. For Kenya, this reinforces the wider lesson from New York State: inclusive education becomes easier to plan and improve when administrative systems routinely report learner placement, support, progression, and transition indicators.

Overall, the New York State case demonstrates that inclusive education requires measurable implementation. Its value for Kenya does not lie in direct replication of the American legal or funding framework, but in the principle of accountability. When placement, transition, and outcomes are publicly monitored, it becomes easier to identify exclusion, set reform priorities, and evaluate whether learners with disabilities are being supported to participate and progress meaningfully.

COMPARATIVE ANALYSIS

5.1 Structural Differences Between the Two Systems

The comparison between Kenya and New York State shows that the two systems differ not only in resources, but also in how they make inclusive education visible, measurable, and accountable. Kenya has adopted inclusive education as a policy principle and recognizes the need to support learners with disabilities through regular schools, integrated units, special schools, Educational Assessment and Resource Centres, and other support structures (Ministry of Education, 2018). However, the publicly available data still mainly show special-needs enrolment, institutional categories, and broad disability classifications. This means that Kenya can identify some exclusion patterns, but it does not yet have a stable national system for tracking where learners with intellectual disabilities are placed, what support they receive, whether they progress across school levels, and what outcomes they achieve.

New York State operates within a different accountability environment. Its special education system is shaped by the Individuals with Disabilities Education Act, especially the least restrictive environment requirement, which links inclusion to placement decisions and reporting obligations (U.S. Department of Education, n.d.). Through the State Performance Plan and Annual Performance Report framework, New York State reports indicators on placement, graduation, dropout, and transition outcomes (New York State Education Department, 2022a, 2022b). This does not mean that New York State has achieved full inclusion, particularly for learners with intellectual disabilities. Rather, it means that the system has stronger tools for identifying how inclusive or restrictive its placements are and whether learners with disabilities are progressing toward meaningful outcomes.

The main structural difference, therefore, lies in the visibility of implementation. Kenya's system is policy-committed but still weak in placement and outcome observability. New York State's system is policy-regulated and accountability-oriented, with clearer mechanisms for reporting learner placement and transition indicators. This distinction is important because inclusive education cannot be improved effectively where learners' pathways remain only partly visible.

5.2 Operational Differences in Placement, Support, and Monitoring

Operationally, Kenya and New York State differ in how they connect assessment, placement, support, and monitoring. Kenya's policy framework recognizes the importance of reasonable accommodation, learner support, assessment services, specialized personnel, and transition across levels of education (Ministry of Education, 2018). However, the available evidence suggests that these components are not yet sufficiently integrated into a strong implementation chain. The sharp decline between primary and secondary statistics for learners recorded under the historical administrative category "Mentally Handicap" suggests that identification at primary level does not consistently translate into supported progression beyond primary education (Ministry of Education, 2019).

In New York State, placement and support are embedded within a more formal accountability structure. Learners with disabilities are placed along a continuum of educational environments, and the system reports the proportion of students educated in regular classrooms for different portions of the school day (New York State Education Department, 2022a). Outcome monitoring also includes graduation, dropout, and secondary transition indicators (New York State Education Department, 2022b). This makes it easier to detect whether learners are concentrated in restrictive settings, whether transition planning is being implemented, and whether learners with disabilities are moving toward completion.

The operational contrast is therefore clear. Kenya's policy language identifies what should happen, while New York State's accountability system makes it easier to track whether it is happening. For Kenya, the implication is not that New York's model should be copied wholesale, but that inclusive education requires a stronger connection between assessment, placement, support, transition, and public reporting.

5.3 Comparable Indicator Dashboard

Table 1 summarizes the best available comparable indicators from Kenya and New York State. The comparison is deliberately cautious because the two systems do not report identical data. Kenya's publicly available data are stronger on special-needs enrolment and disability categories, while New York State's data are stronger on placement, transition, and accountability indicators. The table therefore distinguishes between direct comparison and proxy comparison.

Table 1: Comparable Indicators for Inclusive Education and System Pressure Points in Kenya and New York State

Indicator	Kenya	New York State	Comparative interpretation
Disability prevalence / service population	The Sector Policy cites an 11.4% disability prevalence estimate among persons aged 3–21 years (Ministry of Education, 2018).	In 2022–23, New York served 524,993 children aged 3–21 under IDEA Part B, representing about 21% of public school enrolment (National Center for Education Statistics, 2024).	The figures are not directly equivalent. Kenya reports a prevalence estimate, while New York reports a service eligibility population.
Policy and legal framework	Kenya has an inclusive education policy framework that recognizes learners with disabilities and provides for support through regular, integrated, special, and home-based arrangements (Ministry of Education, 2018).	New York State operates under IDEA and the least restrictive environment requirement, which links placement to legal accountability (U.S. Department of Education, n.d.).	Both systems recognize inclusion, but New York has a more legally operationalized accountability structure.
Primary–secondary special-needs enrolment	Public special-needs primary enrolment increased from 108,221 in 2017 to 136,081 in 2019, while secondary enrolment increased from 4,019 to 4,794 during the same period (Ministry of Education, 2019).	New York does not report inclusion mainly through special-school enrolment. It reports placement through LRE indicators.	Kenya's public data remain institution-focused, while New York's public data are placement-focused.
Intellectual disability transition signal	In 2019, 71,851 learners were recorded under the historical category "Mentally Handicap" at primary level, but no corresponding enrolment was recorded under the same category at secondary level (Ministry of Education, 2019).	A directly equivalent statewide public intellectual-disability transition table was not available in the same format.	Kenya's strongest warning signal is the apparent transition collapse between primary and secondary levels.
Least restrictive	Kenya does not yet provide a nationally harmonized LRE-	In the 2020 baseline, 58.28% of students with IEPs were	New York has a clearer public mechanism for

environment placement	style placement distribution for learners with intellectual disabilities.	educated in regular classes for at least 80% of the school day, 18.16% for less than 40%, and 5.14% in separate, residential, homebound, or hospital placements (New York State Education Department, 2022a).	tracking the restrictiveness of learner placement.
Exiting and transition outcomes	The cited Kenyan sources do not provide a directly comparable disability-disaggregated national dashboard for graduation, dropout, or transition outcomes.	New York reported 76% regular diploma graduation, 12% dropout, and 91.01% performance on the secondary transition indicator (New York State Education Department, 2022b).	New York links special education placement to monitored completion and transition outcomes more visibly than Kenya.

Note. The table compares best available official indicators. Some indicators are proxy-based because Kenya and New York State do not report disability education data using identical categories or accountability frameworks.

The comparison in Table 1 shows that Kenya's challenge is not only limited resources. It is also limited visibility of learners' placement, progression, transition, and outcomes. Kenya has enough official data to identify a serious transition problem among learners with intellectual disabilities, but not enough harmonized public data to fully track how that problem develops across counties, school types, support arrangements, and levels of education. This weakens policy response because the system can see the outcome of exclusion, but not all the pathways that produce it.

New York State, by contrast, demonstrates the value of a reporting system that links inclusive education to measurable indicators. Its data do not prove that all learners with disabilities are fully included, and they do not remove concerns about restrictive placement for learners with intellectual disabilities. However, they make the problem more visible and therefore more open to monitoring, policy debate, and corrective action. The central lesson for Kenya is that inclusive education reform needs a public evidence system that tracks not only whether learners are enrolled, but where they are placed, what support they receive, whether they progress, and whether they transition successfully.

5.4 Transferability and Limits

The most transferable lesson from New York State is not its legal structure, funding model, or institutional design. These cannot be imported directly into Kenya because the two systems differ in fiscal capacity, governance arrangements, legal traditions, school infrastructure, staffing levels, and data systems. The useful lesson is narrower and more practical: inclusive education becomes more governable when it is supported by a small, stable set of public indicators that track placement, support, progression, and transition.

For Kenya, this means that reform should focus on adapting the accountability logic rather than copying the American model. A Kenya-appropriate system would not need to reproduce New York's entire LRE framework. Instead, it could begin with a national placement-and-outcomes dashboard that reports learners with disabilities by disability category, school level, county, placement type, support received, progression status, and transition outcome. Such a tool would allow policymakers to identify where learners with intellectual disabilities are being lost and what forms of support are associated with better progression.

The limits of transferability must therefore be clearly recognized. New York State provides a useful example of measurable implementation, but it does not provide a ready-made solution to Kenya's inclusive education challenges. Kenya's reforms must be phased, locally grounded, fiscally realistic, and sensitive to existing school structures. The comparison supports a practical conclusion: Kenya does not need to become New York State to

strengthen inclusive education. It needs to make learners with intellectual disabilities more visible within its own education data, financing, support, and transition systems.

IMPLICATIONS FOR KENYA

6.1 Build a Kenya-Appropriate Placement and Outcomes Dashboard

The first implication for Kenya is the need to develop a national placement-and-outcomes dashboard for learners with disabilities, with specific visibility for learners with intellectual disabilities. Current official statistics provide important information on special-needs enrolment, but they do not sufficiently show where learners with intellectual disabilities are placed, what support they receive, whether they progress across school levels, or whether they complete meaningful education pathways (Ministry of Education, 2019). This limits the ability of policymakers to identify where exclusion occurs and which interventions are effective.

A Kenya-appropriate dashboard should therefore report more than enrolment numbers. It should capture disability category, county, school level, placement type, support received, progression status, transition outcome, and completion status. Placement type should distinguish between regular classroom placement with support, integrated units, special schools, special units, home-based education, and alternative or vocational pathways. Such a dashboard would make it easier to identify whether learners with intellectual disabilities are concentrated in particular settings, whether they are progressing beyond primary education, and whether support systems are reaching them.

The dashboard should not be designed as a complex high-cost data system at the beginning. Kenya could start with a small number of core indicators that are feasible for schools, Educational Assessment and Resource Centres, sub-county education offices, and county education offices to report annually. The purpose would be to make learner pathways visible. Once learners with intellectual disabilities can be tracked across placement, support, progression, and transition points, inclusive education planning would become more evidence-based and less dependent on broad policy statements.

6.2 Treat Transition of Learners with Intellectual Disabilities as a System Priority

The second implication is that Kenya should treat the transition of learners with intellectual disabilities from primary to secondary education as a core system priority. The available official evidence shows a serious concern: learners recorded under the historical administrative category “Mentally Handicap” were highly visible at primary level but not correspondingly visible at secondary level in the 2019 special-needs statistics (Ministry of Education, 2019). This pattern suggests that many learners with intellectual disabilities may not be receiving adequate support to move beyond primary education.

Transition planning should therefore begin before learners complete primary education. In upper primary, learners with intellectual disabilities should receive individualized transition planning that identifies suitable secondary, functional, vocational, or TVET-linked pathways. This planning should involve teachers, parents, Educational Assessment and Resource Centres, school administrators, and relevant education officers. The goal should not be to force every learner into the same academic pathway, but to ensure that every learner has a realistic, supported, and documented post-primary pathway.

Kenya should also introduce transition indicators into national and county-level monitoring. These indicators could include the number of learners with intellectual disabilities completing primary education, the number transitioning to secondary education, the number joining integrated or special secondary programmes, the number entering functional or vocational pathways, and the number who drop out before transition. Making transition a monitored indicator would help shift the system from simply recording enrolment to actively protecting progression.

6.3 Strengthen Financing Transparency and Adequacy

The third implication concerns financing. Kenya continues to allocate resources to special-needs education, but the current structure of support remains more visible around special-needs institutions than around learner-

specific support needs (Kenya National Treasury, 2024). Inclusive education for learners with intellectual disabilities requires more than general school funding. It requires financing that follows the learner's level of need, placement arrangement, assistive requirements, assessment needs, and transition pathway.

Kenya should therefore move gradually toward a support-based financing model. Under such a model, funding would not be determined only by the type of institution a learner attends. Instead, it would also consider the intensity of support required by the learner. For example, learners with intellectual disabilities may require individualized learning materials, support assistants, adapted assessment, teacher consultation time, transport support, therapy referrals, or transition planning. These supports should be costed and reflected more clearly in education financing.

Greater transparency is also needed. Public reporting should show how much funding is allocated to special-needs education, how much reaches schools, what share supports regular schools and integrated settings, and how much is linked to assessment, assistive devices, teacher capacity, and transition support. This would make inclusive education financing easier to monitor and would help reduce the risk that policy commitments remain underfunded in practice.

6.4 Expand Assessment and Support Capacity

The fourth implication is the need to strengthen assessment and support capacity. Kenya's policy framework already recognizes the importance of Educational Assessment and Resource Centres, specialized personnel, learner support assistants, resource teachers, intervention programmes, and adapted learning resources (Ministry of Education, 2018). However, the transition challenges facing learners with intellectual disabilities suggest that assessment and support services are not yet strong enough to ensure continuity from identification to placement, learning support, progression, and transition.

Educational Assessment and Resource Centres should therefore be strengthened as ongoing support institutions rather than only as initial assessment points. Their role should include assessment, placement guidance, follow-up, parent support, teacher consultation, transition planning, and referral coordination. This would help ensure that learners with intellectual disabilities are not only identified but also supported throughout their schooling pathway.

Teacher capacity should also be expanded. Regular classroom teachers, special-needs teachers, resource teachers, and school leaders need practical training on intellectual disability, curriculum adaptation, behaviour support, functional learning, communication support, inclusive assessment, and transition planning. Without this professional capacity, policy commitments to inclusion may not translate into classroom-level support. Strengthening assessment and support capacity would therefore improve the link between policy, school practice, and learner progression.

6.5 Use Phased and Bounded Implementation

The fifth implication is that Kenya should implement reforms in phases rather than through broad national declarations that are difficult to monitor. Inclusive education reform for learners with intellectual disabilities requires data systems, financing, personnel, school readiness, parental involvement, and transition pathways. These reforms are unlikely to become effective if they are introduced everywhere at once without adequate testing, costing, and adjustment.

A more realistic approach would be to pilot a placement-and-outcomes dashboard, transition tracking tools, and strengthened support routines in selected counties or sub-counties. These pilot sites should include regular schools, integrated units, special schools, Educational Assessment and Resource Centres, and county education offices. The pilot should test whether schools can collect usable data, whether learners can be tracked across transition points, whether assessment follow-up improves, and whether support-based financing can be implemented in practice.

After piloting, the Ministry of Education could evaluate what worked, refine the tools, and scale gradually to more counties. This phased approach would reduce the risk of policy overreach and allow Kenya to build an

inclusive education system that is administratively realistic. The central lesson from the New York State comparison is therefore not direct imitation, but measurable implementation. Kenya can strengthen inclusive education for learners with intellectual disabilities by making learner placement, support, progression, and transition visible, funded, monitored, and gradually improved.

CONCLUSION

This study compared inclusive education for learners with intellectual disabilities in Kenya and New York State to identify practical implications for strengthening Kenya's inclusive education system. The comparison showed that Kenya has already made important policy commitments to inclusive education, but the major challenge lies in implementation. Learners with intellectual disabilities remain vulnerable to weak assessment continuity, limited placement visibility, inadequate support systems, and serious transition barriers between primary and secondary education.

The central finding is that inclusive education cannot be judged only by the existence of policy or by enrolment in special-needs institutions. It must also be judged by whether learners are identified early, placed appropriately, supported consistently, financed adequately, monitored publicly, and enabled to progress across levels of education. Kenya's official statistics already provide enough evidence to show that learners with intellectual disabilities face a severe transition bottleneck. However, the current data system does not yet make their full educational pathway sufficiently visible.

New York State does not offer a model for direct replication because it operates within a different legal, fiscal, and institutional environment. Its value lies in showing how inclusive education can be linked to measurable placement, progression, graduation, dropout, and transition indicators. For Kenya, the most useful lesson is therefore not imitation, but adaptation. Kenya can strengthen inclusive education by developing a national placement-and-outcomes dashboard, improving assessment and support services, introducing monitored transition planning, clarifying support-based financing, and implementing reforms gradually through county-level pilots before national scale-up.

Future research should build on this documentary analysis by collecting field-based evidence from learners with intellectual disabilities, parents, teachers, Educational Assessment and Resource Centre officers, school administrators, and Ministry of Education officials. Such empirical validation would help explain how inclusive education policies are experienced in practice and why learners with intellectual disabilities continue to face weak progression beyond primary education. Until such field evidence is available, the existing official data already point to an urgent policy message: Kenya's inclusive education agenda must move from policy commitment to a measurable, financed, and supported pathway from access to transition and completion.

DECLARATIONS

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