Inclusive Education Post-NEP 2020: A Cross-National Comparative Analysis of India, United States, and Finland

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Abstract

This comparative study critically examines the implementation and evolution of inclusive education policies and practices in India, the United States, and Finland during the period 2019-2024. The analysis is anchored in five core parameters: budget allocation, infrastructure support, teacher training, enrolment of children with disabilities (CwSN), and policy enforcement. The findings reveal that while India has demonstrated significant policy-level commitment through the National Education Policy (NEP) 2020 and initiatives like Samagra Shiksha, practical implementation remains inconsistent, particularly in rural and government schools. In contrast, the USA presents a legally structured inclusive framework reinforced by IDEA and ADA, ensuring accountability and standardized support across most states. Finland's model emerges as the most integrated, where inclusion is embedded as a systemic norm rather than a targeted intervention. Drawing insights from international best practices, the study recommends targeted reforms in India, including mandatory inclusive education training for teachers, improved infrastructure standards, individualized support mechanisms, and increased budget allocations. The study emphasizes the need for data-driven monitoring and legal implementation to bridge policy-practice gaps and advance India's journey toward a truly inclusive education system.

***Keywords*:** inclusive education, NEP 2020, CwSN, samagra shiksha, teacher training, accessibility, educational equity, comparative policy, budget allocation, policy analysis, IDEA, ADA, UNESCO, UNICEF.

Introduction

Inclusive education has emerged as a key of global educational reform, seeking to ensure equitable learning opportunities for all learners, particularly children with disabilities. The United Nations' Sustainable Development Goal 4 (SDG 4) explicitly emphasizes the need to "ensure inclusive and equitable quality education and promote lifelong learning opportunities for all" by 2030 (UNESCO, 2015). Countries worldwide have adopted diverse strategies adapted to their socio-economic conditions, institutional capacities, and educational policy environments.

India, the United States, and Finland represent three distinct yet instructive paradigms in the pursuit of inclusive education. India's commitment is articulated through the National Education Policy (NEP) 2020, which visualizes an equitable and inclusive education system. To operationalize this vision, India has established extensive data monitoring and digital governance mechanisms such as the Unified District Information System for Education Plus (UDISE+), the All India Survey on Higher Education (AISHE), Vidya Samiksha Kendra (VSK), and performance platforms like UTSAH and SAMARTH. Initiatives like the Academic Bank of Credits (ABC) and the National Academic Depository (NAD) have further aimed to enhance flexibility and accessibility in higher education (Ministry of Education, 2020, 2022). Challenges remain in translating policy into practice particularly concerning budgetary allocations, infrastructural adequacy, and teacher preparedness for inclusive classrooms, especially in rural and under-resourced places (Desai & Dubey, 2020; Bhattacharya, 2021).
The United States instead operates under a legally mandated framework for inclusive education, primarily governed by the Individuals with Disabilities Education Act (IDEA) and the Americans with Disabilities Act (ADA). These federal laws ensure constitutional rights, inclusive infrastructure, and dedicated funding streams to support students with disabilities. Consistent national monitoring, state-wise compliance mechanisms, and targeted teacher certification programs have contributed to widespread implementation and accountability (U.S. Department of Education, 2023; Office of Special Education Programs, 2023).

Finland offers a universally integrated model of inclusive education, supported by a deeply embedded culture of equity in its national curriculum. Rather than treating inclusion as a separate stream, the Finnish system incorporates it into mainstream pedagogical practice through organized support mechanisms, powerful teacher education, and decentralized school autonomy. Public investment in infrastructure and teacher preparation plays a crucial role in maintaining near-universal access for all learners, regardless of ability (Finnish National Agency for Education, 2022; OECD, 2022).

This study aims to comparatively examine the evolution of inclusive education systems between 2019 and 2024 in India, the USA, and Finland. Focusing on key dimensions budget allocation, infrastructure accessibility, teacher training, and enrolment of children with special needs this paper draws on government reports, academic literature, and international databases (UNESCO, UNICEF, UDISE+, NCES) to identify best practices and systemic gaps. The

findings offer policy insights to strengthen inclusive education implementation in developing contexts like India, while aligning with global standards of equity and access.

Objectives of the Study

1. To compare the inclusive education policies implemented in India, the United States, and Finland during the period 2019–2024.
2. To analyze key differences and similarities in budget allocations, infrastructure support, teacher training, and enrolment of children with disabilities across the three countries.
3. To critically assess the implementation and impact of India's National Education Policy (NEP) 2020 in the context of global inclusive education standards and practices.

Research Questions

1. How have India, the USA, and Finland allocated budgets for inclusive education between 2019 and 2024?
2. What trends in budget allocation for inclusive education can be observed across the three countries during this period?
3. What infrastructure support systems for inclusive education were developed or strengthened in these countries from 2019 to 2024?
4. How do the three countries differ in terms of accessibility and availability of inclusive education infrastructure?
5. To what extent are teachers in India, the USA, and Finland trained and equipped to implement inclusive education from 2019 to 2024?
6. What are the enrolment trends of children with disabilities in mainstream schools across India, the USA, and Finland during this timeframe?
7. How does India's NEP 2020 approach to inclusive education compare with the more established models in the USA and Finland during the 2019-2024 period?

Allocated Budgets for inclusive education from 2019 to 2024

Table 1 Major Comparative Insights Inclusive Education (IE)

Country	Dedicated IE Budget	Per-Student Spending (2023-24)	Trend Summary
India	₹1,470.4 crore (~$177M)	($180-240) (≈ ₹15,000-20,000)	Gradual increase; more targeted spending post-NEP 2020
USA	$14.2 billion	US$12,000–15,000 (≈ ₹9.9–12.4 lakh)	Stable, with sustained federal support via IDEA
Finland	Part of €6.9B general budget	€8,000–10,000 ≈ US$8,800–11,000 (≈ ₹8–10 lakh)	Inclusion is systemic; no separate budget required

Table 2 Inclusive Education Budget Allocation (2019-2024) *

Parameter	India	USA	Finland
Dedicated IE Budget (2023–24)	**US$177M** (₹1,470.4 crore) under *Samagra Shiksha*	**US$14.2B** under *IDEA Part B*	Embedded in general budget (~**US$7.6B** / €6.9B)
Total Education Budget Context	~**US$4.6B** (₹38,000 crore); ~40% for school education	~10–12% of national ed. budget for inclusion	Ed. budget ~**US$7.5–8.8B** (€6.8–8.1B); ~9–10% of govt. spending
Per-Student Spending (CwSN)	**US$180–240** (₹15,000–20,000)	**US$12,000–15,000**	**US$8,800–11,000** (€8,000–10,000)
Funding Trend (2019–2024)	↑ **43%** increase in CwSN funding	↑ From **US$12B to US$14.2B**	Stable; fully integrated model, no separate budget lines
Approach	Targeted schemes (CwSN-focused) under Samagra Shiksha	Federally mandated funding under *IDEA*	Inclusive model within general education; no segmentation

Conversion estimates: ₹1 = US$0.0121; €1 = US$1.10 (as of 2023–24 averages). USA data sourced from U.S. Department of Education; India data from MoE & PIB; Finland from OECD and Finnish Ministry of Education.

India

India's inclusive education initiatives are primarily funded under the Samagra Shiksha scheme, which integrates support for Children with Special Needs (CwSN). The total budget for Samagra Shiksha increased from ₹36,322 crore in 2019-20 to approximately ₹38,000 crore in 2023-24. Within this, the allocation specifically for inclusive education rose from ₹1,023.5 crore in 2018-19 to ₹1,470.4 crore in 2023-24, marking a 43% increase. The 2023-24 allocation included: ₹743.4 crore for 32,196 special educators, ₹109 crore for assistive devices, and ₹20.7 crore for home-based education for severely disabled students. Per-student spending for children with disabilities in India ranges between ₹15,000 to ₹20,000 per year, depending on the state and support services provided.

United State of America

The United States provides significant federal funding for inclusive education through the Individuals with Disabilities Education Act (IDEA). The funding increased from approximately $12 billion in 2019 to $14.2 billion by 2023, with a request for $14.4 billion in 2024. This represents 10-12% of the total federal education budget. The IDEA funding supports various components of inclusive education, including special education services, teacher training, infrastructure, and instructional resources. Per-student spending on children with disabilities in USA is among the highest globally, estimated at $12,000 to $15,000 per year.

Finland

Finland follows a fully integrated model of inclusive education, where funding is embedded in the general education budget. The Ministry of Education and Culture's budget ranged from €6.8 billion in 2020 to €8.1 billion in 2022, representing approximately 9-10% of total government spending. While Finland does not separately report inclusive education funding, it is estimated that 10-15% of the general education budget supports inclusive practices.
Per-student expenditure for children with disabilities is approximately €8,000 to €10,000 per year. Finland's model emphasizes equity and universal access, and therefore does not isolate inclusive education as a separate budget line.

Trends observed in the budget allocation for inclusive education (2019-2024)

1. **Steady Growth in India's Inclusive Education Budget**
   India's direct funding for Children with Special Needs (CwSN) under Samagra Shiksha increased by 43%, from ₹1,023.5 crore in 2018-19 to ₹1,470.4 crore in 2023-24. The increased allocation post-NEP 2020 reflects India's policy-backed, outcome-oriented approach to achieving equity and access for all learners, especially those with disabilities. India's comprehensive approach towards inclusive education includes infrastructure, teaching resources, and professional development. Teacher training for inclusive classrooms is prioritized to enhance the preparedness of educators to address diverse learning needs.
2. **Consistent Federal Support in USA**
   USA maintained stable and high levels of funding through the IDEA Act, rising from $12 billion in 2019 to $14.2 billion by 2023, with a further $14.4 billion requested for 2024. The funding trend reflects a long-term, legislative commitment to inclusive education. USA also invests heavily in teacher training, infrastructure, and assistive technologies, showing a multi-dimensional use of funds.
3. **Systemic Integration in Finland**
   Finland does not have a separate inclusive education budget; instead, inclusive education is embedded within the general education framework. The national education budget remained relatively stable ranging €6.8 to €8.1 billion, with an estimated 10-15% supporting inclusive education indirectly. This reflects a stable inclusion model, where inclusion is seen not as a separate component but a core principle of education.
4. **Variation in Per-Student Spending**
   USA leads in per-student spending for children with disabilities ($12,000-15,000/year), followed by Finland (€8,000-10,000/year), and then India (₹15,000-20,000/year or ~$180-240) indicating significant differences in resource availability and per student spending across countries.
5. **Increasing Policy Emphasis across All Countries**
   A trend of growing policy focus on inclusion was observed with various policy initiatives and increased budget allocations like NEP 2020 in India, continued IDEA enforcement and funding in USA, ongoing curriculum integration and teacher training expansion in Finland. The observed trends indicate a global move towards

strengthening inclusive education either through direct funding increases (India, USA) or through structural integration (Finland). While the approaches vary, the common direction is toward greater inclusivity, equity, and accessibility in education systems.

Infrastructure support systems for inclusive education

Infrastructure plays a critical role in enabling inclusive education by ensuring that children with disabilities have equal access to school facilities, assistive technologies, and specialized support services. The infrastructure support systems for inclusive education vary significantly across India, USA, and Finland, reflecting differences in policy maturity, resource availability, and implementation strategies.

Table 3 Infrastructure Support for Inclusive Education (2019-2024)

Parameter	India	USA	Finland
% of Schools with Ramps	71.8% (2021-22), 52.3% with handrails (2023-24)	~95% ADA-compliant (2022 data)	~100% accessible as per national standards
% of Schools with CWSN Toilets	33.2% have toilets; 30.6% functional (2023-24)	Majority, ADA-compliant (data varies by district)	100%, accessible facilities per national standards
Assistive Technology Availability	~25% of CWSN-supported schools	>70% of schools	Standardized across classrooms & educational settings
No. of Resource Centers	~10,000 district level centers	~20,000 across districts	Integrated in municipal schools
Digital Accessibility Focus	Limited, in progress via Samagra Shiksha	Strong federal push (DOJ & ADA updates)	Fully integrated, includes digital pedagogy tools
Policy Mandate	Samagra Shiksha + NEP 2020	IDEA + ADA	National Education Policy + Equality inclusion mandates
Urban–Rural Gap	Significant gap in rural access	Moderate, improving via audits & interventions	Minimal; equity ensured through municipal oversight
Specialized Infrastructure	Rare, mostly project-based	Available in many inclusive schools	Common in inclusive settings

India

India has significantly expanded its support infrastructure under Samagra Shiksha, establishing over 10,000 district-level resource centers between 2019 and 2024. These centers coordinate screening, therapy (speech, occupational), counselling, and teaching-learning materials

specifically for Children with Special Needs (CwSN) (PIB, 2023). The scheme also mandates trained special educators and IEP-based planning, alongside accessible physical infrastructure upgrades like resource rooms and ramps (MoE, 2024).

United States

Under IDEA, the U.S. operates approximately 20,000 resource support centers bundled into public school districts. These centers facilitate IEP development and implementation, service delivery (therapy, aides), and coordination of assistive technology applications (USDOE, 2023). Federal grants through IDEA Parts B and C ensure sustained funding for such infrastructure and specialized staffing.

Finland

Finland's inclusive infrastructure is organized through Valteri Centres, six regional national consulting hubs. These support schools across 70% of municipalities and advise on inclusive pedagogies, curriculum adaptation, and assistive technology implementation, serving around 2,500 students directly while supporting broader mainstream capacity building (Yada, 2024; European Agency, 2022).

Accessibility and availability of infrastructure for inclusive education

Table 4 Accessibility & Availability of Inclusive Education Infrastructure

Aspect	India	USA	Finland
Physical Accessibility	Partial: 71.8% of schools have ramps; 52.3% have handrails (MoE, 2024; CAG, 2024)	High: ~95% of schools ADA-compliant; older buildings may lack updates (Accessibility Checker, 2024)	Universal: Nearly 100% of schools meet national accessibility standards (European Agency, 2022)
Toilets for CWSN	33.2% have CWSN-friendly toilets; only 30.6% are functional (MoE, 2024)	Most schools have ADA-compliant restrooms (NCES, 2023)	All schools have accessible facilities as per universal design (European Commission, 2023)
Assistive Technology	Low: Present in ~25% of CWSN-supported schools (NIEPA, 2023)	Moderate–High: Available in >70% of schools (USDOE, 2023)	High: Standardized in all classrooms (EDUFI, 2023)
Resource Centers	~10,000 centers; uneven distribution across regions (MoE, 2024)	~20,000 centers nationwide (IDEA Data Center, 2023)	Integrated in local schools via municipal systems (EDUFI, 2023)
Digital Accessibility	Limited: Samagra Shiksha initiatives	Strong: DOJ mandates digital accessibility;	Fully embedded in inclusive pedagogy with

Aspect	India	USA	Finland
	ongoing; rural divide persists (MoE, 2023)	inclusive ed-tech used widely (DOJ, 2023)	adaptive platforms (Finnish National Agency for Education, 2023)
Urban–Rural Equity	Large gaps persist in rural schools (CAG, 2024)	Moderate: Gaps narrowing through federal programs (NCES, 2023)	Minimal: Strong municipal oversight ensures consistency (European Agency, 2022)
Inclusion as a Norm	Emerging: NEP 2020 promotes inclusion, implementation in progress (MoE, 2020)	Mandated: IDEA and ADA enforce inclusive practices (USDOE, 2023)	Fully realized as part of national education philosophy (EDUFI, 2023)

India

As of 2023–24, 71.8% of schools had ramps, while only 52.3% had handrails. About 33.2% of schools reported CwSN-friendly toilets, but only 30.6% were functional. Assistive technology is available in just 25% of schools supporting CwSN, and digital accessibility remains limited, especially in rural regions (CAG, 2024; NIEPA, 2023).

United States

Approximately 95% of schools are ADA-compliant, featuring accessible restrooms, ramps, wide doorways, and elevators. Over 70% of schools have assistive technology available. Digital accessibility is reinforced via DOJ mandates and regular audits, narrowing compliance gaps across districts (Accessibility Checker, 2024; DOJ, 2023).

Finland

Nearly 100% of schools are physically accessible as per national standards. Assistive technology is standardized across classrooms, and all schools include accessible sanitation facilities and digital learning tools aligned with inclusive pedagogy. Finland's holistic system ensures minimal urban–rural disparity in accessibility (EDUFI, 2023; European Commission, 2023).

Proficiency of teachers to deliver inclusive education

Table 5 Teacher Training and Preparedness for Inclusive Education

Aspect	India	USA	Finland
% of Teachers Trained	~9.5% of teachers trained in inclusive education (UDISE+	~60% of special-ed teachers certified;	100% receive inclusive education training as part of mandatory teacher

Aspect	India	USA	Finland
	2023–24 data—Goa example indicates low overall rates)	mandatory in-service PD	education (Gagnon et al., 2023)
Pre-Service Training	Partial: Inclusion introduced in B.Ed., but not universal (UDISE+ data)	Required for all special educators under IDEA	Inclusive coursework mandated in Master's-level programs (Gagnon et al., 2023)
In-Service Training	Limited & uneven; state variation is significant	Strong, federally & state-supported PD with annual updates	Mandatory CPD aligned with equality and inclusion plans (OECD RtL Programme)
Special Education Certification	~2.9% of deployed special educators in schools (UDISE+ 2023–24 highlights acute shortage)	Certification mandatory under IDEA; all districts employ certified staff	All teachers trained to support tiered inclusive interventions
Access to Teaching Resources	Moderate: uneven distribution of inclusive resources	High: IEP-guided access to UDL tools & assistive tech	Universal: digital tools & inclusive pedagogy available in all schools
Government Support Schemes	NCTE-led initiatives; inclusion embedded in NEP 2020 goals	Funded via IDEA and Teacher Quality Partnerships	€40M allocated for inclusive teacher education and professional development (RtL)
Challenges	Fragmented implementation; lack of uniform training model	Legal compliance uneven across districts	Strong policy alignment; minimal training gaps

India: Foundational but Fragmented Efforts toward Inclusive Teacher Training

India has initiated policy-led efforts to build an inclusive teaching workforce, especially after the National Education Policy (NEP) 2020 emphasized inclusive pedagogy. Progress remains uneven across regions. According to UDISE+ data, only 9% of teachers nationwide had received formal training in inclusive education by 2023-24, with significantly lower implementation in rural and government schools (Ministry of Education, 2024). While inclusion has been introduced in the B.Ed. curriculum, its rollout is partial and lacks standardization across teacher education institutions. In-service training under Samagra Shiksha exists but is largely voluntary and varies in intensity and duration across states. Approximately 32,000 special educators are deployed nationally, but their presence is insufficient for the scale of inclusive needs (UDISE+, 2024). Teacher training programs often lack hands-on exposure and are limited to theoretical modules. Despite a supportive policy framework, India’s challenge lies in scaling quality training with uniform standards and improving access in underserved areas.

United States: Structured and Legally Mandated Teacher Preparation

The United States offers a robust, legally grounded system of inclusive teacher education through the Individuals with Disabilities Education Act (IDEA) and related federal mandates. Around 60% of special education teachers hold full certification, and inclusive pedagogy is embedded in both pre-service and in-service training (U.S. Department of Education, 2023). General educators also receive training in Universal Design for Learning (UDL) principles. Federal initiatives such as the Teacher Quality Partnership (TQP) and Supporting Effective Educator Development (SEED) fund continuous professional development. Schools are required to implement Individualized Education Programs (IEPs), necessitating personalized instructional planning. In 2023, over $343 million was allocated for Diversity, Equity, and Inclusion (DEI) training programs, and updated ADA regulations in 2024 introduced new requirements for instructional accessibility (NCES, 2024). Implementation varies across districts, the U.S. maintains a nationally aligned and adequately resourced teacher training infrastructure for inclusive education.

Finland: Inclusive Pedagogy as a Universal Standard

Finland exemplifies an education system where inclusive education is foundational, not supplementary, to teacher preparation. Every teacher completes a Master's-level degree where inclusive pedagogy is a compulsory component, with 100% coverage in both pre-service and in-service training (Finnish Ministry of Education, 2023). Pre-service educators undertake dedicated coursework ranging from 1 to 6 credits in inclusive or special education with opportunities for specialization. Ongoing professional learning is mandated, with municipal authorities ensuring that Continuous Professional Development (CPD) aligns with equality legislation and practical classroom demands. Finnish educators operate within a three-tiered support model that allows early intervention and targeted support without needing categorical disability labels. In 2023, the government allocated €2 million specifically for special education teacher training, followed by a €40 million expansion in 2024 to increase inclusive teacher education slots (OECD, 2024). Finland's inclusive teacher training framework is systemic, cohesive, and equity-driven making inclusive education the norm across all schools.

Enrolment trends of children with disabilities in mainstream schools

India: Modest and Uneven Progress in CwSN Enrolment

India has witnessed gradual but inconsistent improvements in enrolling Children with Special Needs (CwSN) in mainstream education between 2019 and 2024. The total enrolment stood at 21.91 lakh in 2019-20, dipped during the COVID-19 period (2020-21), and rebounded to 22.67 lakh in 2021-22, only to decline again slightly in 2022-23 (UDISE+, 2024). The net gain of just 0.77 lakh over five years reflects a stagnating trend, with current enrolment covering approximately 42% of all children with disabilities of school-going age. Challenges such as limited accessible infrastructure, regional disparities, and shortage of trained inclusive educators persist. While initiatives under Samagra Shiksha and NEP 2020 aim to enhance

inclusion, the realization of full participation remains inhibited by logistical and social barriers, particularly in rural regions.

USA: Stable and High Rates of Inclusion Backed by Legal Mandates

The United States maintains consistently high enrolment of students with disabilities in public education, primarily under the Individuals with Disabilities Education Act (IDEA). Between 2019 and 2024, enrolment rose from 7.3 million to 7.9 million, with a temporary dip in 2020-21 attributed to the pandemic (U.S. Department of Education, 2024). Approximately 65% of these students spend 80% or more of their school day in general education classrooms, highlighting a strong commitment to inclusive placement. The IEP (Individualized Education Program) framework ensures that students receive specialized support within mainstream settings. The federal government's ongoing investment in data monitoring, professional development, and DEI initiatives has further reinforced sustained inclusion across states, although local variations in implementation continue.

Finland: World-Leading Integration through a Tiered Support Model

Finland represents a global exemplar in inclusive education, with a steadily increasing proportion of students receiving support rising from 20.1% in 2019 to 25.5% in 2023 (Finnish Ministry of Education, 2024). This model integrates intensified and special support within mainstream settings rather than segregated institutions. Till 2023, only about 10% of students receiving support were in full-time special schools; the vast majority remained in general classrooms. The country's three-tier support system, combined with a strong emphasis on early intervention and continuous teacher collaboration, ensures that nearly 90% of children with disabilities are educated alongside their peers. The inclusive philosophy is not only a policy directive but a deeply embedded practice supported by national curriculum standards, teacher education, and ongoing resource allocation.

Table 6 Enrolment Data (in lakhs)

Country	Academic Year	CwSN Enrolment (in millions)	% of Total Students / CwSN Population	Mainstream Inclusion Rate	Source / Notes
India	2019–20	2.191	~42% of total CwD population	Estimated ~50–60%	UDISE+ (2024)
	2020–21	2.169 ↓			Drop due to COVID-19
	2021–22	2.267 ↑			Partial recovery
	2022–23	2.107 ↓			State-wise disparities
	2023–24	2.114 ↑			Enrolment stagnant (UDISE+)
USA	2019–20	7.3	~14% of total public school students	~65% in gen. classrooms	IDEA Section 618 Data

Country	Academic Year	CwSN Enrolment (in millions)	% of Total Students / CwSN Population	Mainstream Inclusion Rate	Source / Notes
	2020–21	7.2 ↓	~14%		Minor COVID impact
	2021–22	7.3 ↑	~15%		Strong IEP implementation
	2022–23	7.5 ↑	~15%		Federal monitoring effective
	2023–24	7.9 ↑	~15%		IDEA compliance steady
Finland	2019-20	0.113	20.1% of total students	~90% in mainstream	EDUFI (2024)
	2020-21	0.120 ↑	21.3%		Tiered support model
	2021-22	0.128 ↑	22.7%		Special schools <10%
	2022-23	0.135 ↑	23.7%		Integration deepening
	2023-24	0.143 ↑	25.5%		Among highest globally

**** All figures in millions; sources: UDISE+ (India), U.S. Department of Education IDEA Data (USA), Finnish National Agency for Education (Finland)***

India's figures represent children with special needs enrolled in formal schooling but not necessarily all in inclusive settings. (~42% of the estimated disabled child population are enrolled; UDISE+, 2024).

USA's IDEA defines inclusion through LRE (Least Restrictive Environment), with 65%+ of students spending 80% or more of their day in general education classrooms (U.S. DOE, 2024).

Finland's inclusive strategy ensures nearly 9 in 10 students receiving support are within general education, supported by tiered intervention systems (EDUFI, 2024).

Inclusive education approach Post NEP 2020 in India's & established models of USA and Finland

Table 9 Comparative Overview: NEP 2020 vs. USA & Finland

Aspect	India (NEP 2020)	USA (IDEA & ADA)	Finland
Legal Backing	Policy-based (NEP 2020, RTE Act); not constitutional in courts (MoE, 2020)	Strong legal mandates: IDEA, ADA; rights-based and constitutional (U.S. DoE, 2024)	Fully embedded in national education system and law (EDUFI, 2023)
Teacher Training	~9% trained in inclusive ed; gaps in pre-service and in-	~60% special ed teachers certified; mandatory PD	100% receive formal inclusive ed training in

Aspect	India (NEP 2020)	USA (IDEA & ADA)	Finland
	service (UDISE+, 2024)	via SEED & TQP (U.S. DoE, 2024)	Master's programs (EDUFI, 2023)
Individualized Planning	IEPs proposed but not standardised; under Samagra Shiksha (MoE, 2024)	IEPs legally required for all students with disabilities (IDEA, 2024)	Needs-based support without formal diagnosis or IEP (EDUFI, 2023)
Inclusion Rate	~42% of CwSN in mainstream schools (UDISE+, 2024)	~65% of students with disabilities in general classrooms (U.S. DoE, 2024)	~90% of students with support needs are in regular classrooms (EDUFI, 2023)
Support System	~32,000 special educators across India; improving under Samagra Shiksha (MoE, 2024)	Strong multidisciplinary teams, IEP committees, legal support (IDEA & ADA, 2024)	Tiered support model integrated into all schools; no separate special schools needed (EDUFI, 2023)
Infrastructure	Expanding; gaps in rural areas; ramps, CwSN-friendly toilets, assistive tech (MoE, 2024)	ADA mandates full physical and digital accessibility (ADA, 2024)	Fully accessible, inclusive design embedded in all new constructions (EDUFI, 2023)

India's transformative vision for inclusive education

India's National Education Policy (NEP) 2020 presents a transformative vision for inclusive education by aiming to ensure equitable access and learning opportunities for all, including Children with Special Needs (CwSN). The policy demands for reforms such as the integration of Individualized Education Plans (IEPs), recruitment of special educators, inclusive curriculum design, and infrastructure upgrades through the Samagra Shiksha scheme. As of 2023-24, only around 9% of teachers had received formal training in inclusive education (UDISE+, 2024), and implementation remains uneven across regions, particularly in rural areas. While NEP 2020 outlines strong policy intent, it lacks the proper legal mandates and systemic depth seen in more established models like those of the USA and Finland (Ministry of Education, 2020).

USA's legally grounded inclusive education framework

In contrast, the USA's inclusive education framework is legally grounded in the Individuals with Disabilities Education Act (IDEA) and Americans with Disabilities Act (ADA), which guarantee Free Appropriate Public Education (FAPE) and full accessibility for students with disabilities. The USA mandates Individualized Education Programs (IEPs) for each student with disabilities and ensures that over 60% of special educators are formally certified, with regular in-service professional development (U.S. Department of Education, 2024). The

infrastructure is largely ADA-compliant, and roughly 65% of students with disabilities are educated within general classrooms. Despite some disparities in implementation across states, the USA maintains robust funding, legal accountability, and technological support systems, which collectively ensure more consistent delivery of inclusive education (IDEA, 2024).

Finland's highly Integrated Model

Finland represents a highly integrated model where inclusion is embedded into the broader education system rather than treated as a separate domain. All teachers receive mandatory training in inclusive pedagogy during their pre-service education (EDUFI, 2023), and the three-tiered support system comprising general, intensified, and special support is universally available within mainstream schools. Finland does not require formal disability diagnosis for support services, emphasizing a needs-based approach rooted in equity. As a result, nearly 90% of students with disabilities attend general education schools, making Finland a global exemplar of inclusive practice. The Finnish model is further supported by national Equality Plans and a well-resourced municipal school system (Finnish National Agency for Education, 2024).

Analysis of Objectives

Objective 1: Comparison of Inclusive Education Policies (2019–2024)

From 2019 to 2024, India, the USA, and Finland have taken distinct approaches to inclusive education. India's NEP 2020 signals a paradigm shift toward equity and inclusion, but remains policy-driven rather than legally fair. The USA operates under strong legal mandates like IDEA and ADA, ensuring constitutional rights and individualized support (U.S. Department of Education, 2024). Finland follows a systemic inclusion model with support integrated into its national education strategy (EDUFI, 2023).
India has initiated reforms such as curriculum flexibility, inclusive pedagogy, and the introduction of IEPs. These remain unequally implemented. Opposite to that, USA mandates IEPs and legal recourse for non-compliance, while Finland emphasizes needs-based support within mainstream classrooms without requiring diagnoses (Ainscow & Messiou, 2022).

Objective 2: Differences in Budget, Infrastructure, Teacher Training & Enrolment

India's allocation for CwSN rose from ₹1,023.5 crore to ₹1,470.4 crore between 2018-19 and 2023-24, indicating stronger fiscal attention (Ministry of Education, 2024). In comparison, the USA consistently invested $12–14.2 billion annually via IDEA, reflecting long-term systemic support (U.S. DOE, 2024). Finland does not separate funding but embeds inclusive education into its general education budget estimated at 10-15% of total expenditure (European Agency, 2023).

Infrastructure-wise, only 52.3% of Indian schools have ramps and 33.2% accessible toilets (UDISE+, 2024). The USA has ~95% ADA-compliant schools and widespread assistive technology. Finland leads with near-universal accessibility and built-in inclusive design.

In terms of teacher training, India lags with only 9% trained in inclusive education by 2023-24. The USA mandates certification for ~60% of special educators, and Finland ensures 100% of teachers are trained in inclusive practices during pre-service and CPD (OECD, 2023).

Enrolment of CwSN in India stood at ~21 lakh (~42%) in 2023-24. The USA served 7.9 million students under IDEA, with 65% in inclusive classrooms. Finland includes ~90% of students with disabilities in mainstream settings using arranged supports (EDUFI, 2023).

Objective 3: Assessment of NEP 2020 Implementation in Global Context

NEP 2020 introduces inclusive values such as flexible curricula, IEPs, and CwSN resource centres. Implementation gaps remain stark, particularly in rural areas and teacher readiness. India's decentralized model results in uneven execution, unlike the USA's federally mandated inclusive education or Finland's cohesive municipal-led system.

Infrastructure upgrades under NEP show progress (e.g., assistive technology and building accessibility), but lack uniformity. While teacher education reforms have begun, only a minority of educators are currently trained to manage diverse learning needs.

NEP 2020 presents a progressive framework but falls short of the legal force and operational maturity seen in the USA and Finland. India's inclusive education ecosystem is developing, and long-term progress depends on enforcing policy mandates, increasing investments, and institutionalizing teacher preparedness.

Findings: Comparative Analysis of Inclusive Education Implementation (2019-2024)

This study analyzed five critical dimensions of inclusive education budget allocation, infrastructure support, teacher training, enrolment trends, and policy implementation in India, USA, and Finland. Key findings are as follows:

1. **Budget Allocation for Inclusive Education**
   India: Budget allocation for CwSN increased by 43% (2018-2024), yet per-student spending remains low (~₹15,000-₹20,000/year), reflecting limited fiscal depth.
   USA: Maintains robust and legally protected funding through IDEA, averaging $12-$14.2 billion annually, ensuring systemic consistency.
   Finland: Does not earmark a separate inclusion budget; instead, integrates inclusive services within the core education system, utilizing ~10-15% of the general education budget.
2. **Infrastructure Support Systems**

India: Infrastructure is fragmented only 52.3% of schools have ramps and 33.2% accessible toilets (UDISE+, 2024), especially inadequate in rural regions.
USA: ~95% of public schools meet ADA accessibility standards; assistive technologies and Universal Design for Learning (UDL) are widely implemented.
Finland: Achieves near-total accessibility with inclusive architecture, flexible learning spaces, and embedded assistive tools as national standards.

3. **Teacher Training and Preparedness**
India: Teacher capacity remains underdeveloped only ~9% of teachers trained in inclusive education (2023-24), with inconsistent pre-service and in-service models.
USA: 60% of special educators are certified; inclusion-focused PD is governmentally supported and regularly updated under IDEA mandates.
Finland: 100% of teachers receive structured training in inclusive pedagogy through mandatory Master's-level pre-service programs and continuous professional development.

4. **Enrolment of Children with Disabilities (CwSN)**
India: CwSN enrolment reached 21.14 lakh (~2.1 million) in 2023-24; only ~42% attend mainstream schools, showing limited inclusion in practice.
USA: Serves 7.9 million students under IDEA, with ~65% participating in general classrooms for over 80% of the school day.
Finland: Approximately 90% of students with special needs are educated in mainstream settings, supported by a robust three-tier intervention system.

5. **Policy Execution and Legal Enforceability**
India: NEP 2020 outlines a visionary framework; implementation is decentralized, uneven, and inhibited by infrastructural and training deficits.
USA: Operates within a legally enforceable inclusion framework (IDEA, ADA), ensuring accountability, resource allocation, and individualized planning.
Finland: Embeds inclusion as a fundamental right and pedagogical norm, realized through coherent policy, curriculum alignment, and strong municipal governance.

Recommendations for Strengthening Inclusive Education in India

Drawing from the comparative analysis of inclusive education practices in India, USA, and Finland (2019-2024), the following strategic recommendations are proposed to enhance India's policy implementation and bring it in line with global standards:

1. **Enhance Teacher Competency in Inclusive Pedagogy**
Mandate inclusive education modules in all pre-service and in-service teacher training programs across states.
Expand access to continuous professional development (CPD) through scalable online and blended models, especially targeting underserved regions.
Institutionalize mandatory certification and motivate career progression for special educators.

2. **Upgrade Infrastructure and Ensure Accessibility**

Prioritize dedicated investment in barrier-free infrastructure (e.g., ramps, CWSN-friendly toilets, assistive technologies) with rural-first implementation.

Formulate and enforce national standards for inclusive infrastructure, linked with UDISE+ and third-party audits for agreement tracking.

3. **Increase and Streamline Budget Allocation**

   Assign a fixed percentage of the education budget exclusively for inclusive education interventions.

   Ensure timely release, efficient utilization, and transparency of funds under schemes like Samagra Shiksha to avoid restrictions.

4. **Institutionalize Data-Driven Decision Making**

   Strengthen EMIS (Educational Management Information Systems) to capture separated, real-time data on enrolment, retention, and learning outcomes of CwSN.

   Support analytics to target underperforming districts and design context-specific interventions.

5. Implement Individualized and Tiered Support Systems

   Operationalize Individualized Education Plans (IEPs) across schools, with support from trained teams of general and special educators.

   Integrate a classified system of academic and behavioural interventions (adapted from Finland) to ensure proactive support for diverse learners.

6. Establish Legal and Accountability Mechanisms

   Introduce statutory provisions under NEP 2020 for constitutional inclusive education rights, presented after the USA's IDEA framework.

   Integrate inclusion metrics within national school performance evaluations (e.g., PGI, NAS) to ensure institutional accountability.

7. Scale Best Practices and Model Schools

   Establish inclusive demonstration schools in every district as hubs for innovation, research, and teacher capacity building.

Considering international models (e.g., Finland's multi-tiered support system) for adaptation within Indian education settings.

Conclusion

This comparative analysis examined the progress of inclusive education in India, the United States, and Finland (2019-2024) across key dimensions budget allocation, infrastructure, teacher preparedness, enrolment patterns, and policy execution.

India, guided by the National Education Policy (NEP) 2020, has articulated a forward-looking vision for inclusive education. Distinguished progress includes increased funding through Samagra Shiksha, gradual infrastructure development, and policy attention to inclusive teacher training. Implementation remains uneven. Gaps remains in terms of teacher readiness (~9% trained), limited assistive resources, and disparities in access, particularly across rural and underfunded regions.

The United States operates under a legally binding framework, grounded in the Individuals with Disabilities Education Act (IDEA) and the Americans with Disabilities Act (ADA). These enforce inclusive education as a right, backed by annual funding exceeding $13 billion. Most schools are ADA-compliant, and over 60% of educators are formally trained in special education. Despite variation in infrastructure and service quality exists across districts.

Finland demonstrates a fully embedded and equitable model. Inclusion is integrated systemically, not as a special initiative. All educators receive mandatory training in inclusive pedagogy as part of their Master's programs, and accessibility is universal. The absence of segregated budgeting underscores the philosophy that inclusion is a core function of general education, supported by a tiered support system tailored to learner needs.

India is in a transitional phase with strong policy intent but operational gaps. Aligning with global best practices, India must strengthen implementation mechanisms, institutionalize inclusive teacher training, ensure universal infrastructure accessibility, and adopt data-driven monitoring frameworks. Lessons from the U.S.'s legal accountability and Finland's systemic integration can guide India in crafting a adaptable, equitable, and sustainable model of inclusive education, ensuring that “education for all” becomes a tangible reality for every learner, regardless of ability.

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