

Contesting music education policies through the concept of reasonable accommodation: Teacher autonomy and equity enactment in Finnish music education

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journals.sagepub.com/home/rsm**Sanna Kivijärvi** 

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Abstract

This theoretical article focuses on reasonable accommodation in education by offering conceptual tools that could prove beneficial in resolving policy concerns for equity in music education. Providing reasonable accommodation entails making necessary and appropriate modifications that may include depending on the circumstances, physical or interaction-related changes. From the perspective of teacher autonomy, this article focuses on two aspects of reasonable accommodation: (a) its definition and (b) its implications for music education practice. Responsibility for reasonable accommodation is considered in the context of Finnish music education through three illustrations that address matters such as music notation and instrument selection. We conclude that the concept of reasonable accommodation offers students and teachers tools to prevent disadvantageous musical and pedagogical conventions from being enforced at the level of the local curriculum and through teachers' actions, potentially resulting in inequities and discrimination.

Keywords

educational equity, education policy, music education, reasonable accommodation, social model of disability

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Introduction

This theoretical article addresses the matters of disability and equity in relation to the concept of reasonable accommodation within the context of music education. Reasonable accommodation is formulated in the United Nations' (UN) Convention on the Rights of Persons with Disabilities (CRPD), which approaches the social construction of disability from a politicised perspective and declares that failure to make accommodations constitutes a form of discrimination (UN, 2006, Articles 2 and 24).

In this article, conceptual perspectives on reasonable accommodation in music education are presented in the context of Finnish music education system. Each perspective carries implications for adjustments in music education practice. The article aims to contest music education policy thinking that reflects the dichotomous discourse of normal versus abnormal in education, categorising and labelling people's needs as ordinary or special (Adamek & Darrow, 2010; Kauffman et al., 2017; Laes, 2017; Ockelford, 2012; Vehmas, 2010). This theoretical article moves the conversation beyond special and inclusive music education, and aims for music educators to become better-skilled at how they gear their teaching towards equity.

To foster and move beyond inclusive education (as defined in the UNESCO Salamanca Statement in 1994), education policy actors should acknowledge how the social model of disability can advance achievement of substantive equity. Following the social model of disability, we argue in this article that music educators should conceptualise disability as a politically structured injustice. Underpinning the social model of disability is a distinction between impairment and disablement (e.g., Walker, 1993), and the model argues that failure to make such a distinction may generate physical barriers and discriminatory attitudes that pose obstacles for a disabled person from participating in the community. The social model demands a rethinking of how the human body is perceived and how society is organised. In the same way as Rawls (1971) considers that the key issue in political justice is a contractual one, social modelists deem the key question in disability to be a social one (Beadry, 2016).

Equity, as an educational starting point, denotes a shift in perspective entailing educational policies to one in which accommodations are made based on individuality instead of individual needs. It implies that factors specific to one's personal condition should not interfere with one's access to education and that 'fairness' must be promoted to contribute to students' educational achievements (Ainscow, 2016).

This article offers reasonable accommodation as a conceptual tool that could prove beneficial in resolving education-policy concerns for equity in music education. Reasonable accommodation is a concept elaborated as a legally binding international human rights obligation in the CRPD, which, in Article 2, defines *reasonable accommodation* as

necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms.

The duty laid out in the CRPD to provide reasonable accommodation extends to a broad array of social actors, including all education providers, and requires the actors to reasonably adjust policies, practices and premises that impede the inclusion and participation of those with disabilities (Lord & Brown, 2011). Within the context of disability law and policies, the concept of reasonable accommodation is a tool to fine-tune non-discrimination obligations (Waddington, 2014). If the CRPD's promise of equal education is to be realised, teachers have to be educated as to what the application of reasonable accommodation requires of them in practice, and in terms of teacher autonomy.

This article analyses how reasonable accommodation can be defined in music education by posing the question: 'In what ways can reasonable accommodations enact equity in music education?' In this article, we contribute to theoretical and conceptual underpinnings of music educators' work and professionalism. There is no empirical enquiry as part of this examination. Our perspective is theoretical, meaning that we focus on literature, aiming to clarify relationships between concepts relevant to our research question. The materials in this study are literature of disability studies, non-discrimination law, education policy and music education. However, we use some practical illustrations, constructed from actual examples,¹ to concretise the theoretical analysis. These examples used in this article are based on the authors' real-life experiences regarding reasonable accommodation. Each example includes a detailed context description.

We start by considering pertinent research on music education and disability, then clarify the concept of reasonable accommodation and its connections to accessibility and teacher autonomy. To position the study, Finnish music education context is presented from the perspective of equity and teacher autonomy. Finally, the ways in which reasonable accommodation may be utilised to advance music education policies in Finland are examined, followed by a discussion and conclusions.

Conceptualisations of disability in music education

Extant research on music education seems to follow the broader changes to educational terminology in the 1980s, when the objective was to eliminate exclusionary policies that relied on categories based on specific impairments. In the interest of creating policies that support integration, the focus of this trend was to arrange education based on a detailed assessment of students' needs, instead of specific impairments (Vehmas, 2010). In the field of music education, this shift in thinking is demonstrated in a number of articles in which a dichotomy is presented between 'abled' people and students, characterised by terms such as 'special needs', 'special educational needs' or 'students/people with disabilities' (e.g., Adamek, 2001; Adamek & Darrow, 2010; Darrow, 2003; Kivijärvi & Poutiainen, 2019; Lapka, 2006; McCord & Fitzgerald, 2006; McCord, 2017; Melago, 2014; Ockelford, 2012; Rathgeber, 2016; Vanweelden, 2001).

The idea of 'special music education' also follows this line of conceptualisation, even though very little attention has been paid to defining it. It seems that special music education focuses more on the curricular or organisational level of educational policies, that is, addressing a specialised curriculum or school for those with special needs (on the definition of *special education*, see Vehmas, 2010, and Kauffman et al., 2017). Some scholars even have argued that music education still aligns with the medical model of disability (Bell, 2017; Lubet, 2010), implying that music education emphasises interventions of various kinds through which the educator can make the student fit the educational structures.

According to the social model, the standards for disability are context-dependent, and the focus is on the individual's experience (Barnes, 2012). This broader vision leads to policies—concerned mainly with removing disabling structures and practices, and strongly emphasising human rights—that differ profoundly from those stemming from the medical model of disability (Shakespeare, 2014). This, in turn, carries important implications for the social order in that, when disabling barriers are removed, people can exercise choice and control in their lives and society. A captivating example is the success of the internationally renowned punk band *Pertti Kurikan Nimipäivät* (based in Helsinki, Finland), which rose to public prominence while participating in the Eurovision song contest in 2015. Notably, these musicians have performed independently on national and international stages, and they have expressed their opinions on

social issues and disability rights without help or continuous assistance. Their success has sparked a public debate about the social participation and citizenship of people who have disabilities. In particular, ratification of the CRPD (which took place in Finland on 11 May 2016) was discussed widely in Finnish media after the band participated in the Eurovision contest (Helsingin Sanomat [HS], 2015). These phenomena represent, or even go beyond, the social model of disability.

In the renewal of music education theory and practice, Laes (2017) has focussed on the issue of disability by creating a theoretical framework for examining the potential opportunities for activism in music education. She considers democracy to be an experiment through which it is possible to radically reconstruct the envisioning and implementation of inclusive music education (Laes, 2017). Along similar lines, Darrow (2015) and Bell (2017) have taken further steps by applying key concepts in disability studies—such as the medical and social models of disability, and disability identity to the field of music education. Similarly, Pickard (2019) has mediated the medical and social interpretations of disability, and proposed an informed, strength-based approach to instrumental tuition of students with Down Syndrome while criticising the concept of differentiation preserving the dominant, ableist discourses in music education. Relying on Foucault's theorization of power, Churchill (2015) has crafted a poststructuralist narrative approach and applied it in the context of hard-of-hearing musicians from an inclusion standpoint.

All in all, the construction of disability has been defined from varying and often opposing perspectives within music education research. This article distinguishes itself from the discussions presented above by focusing on the concept of reasonable accommodation. The objective here is not to contribute to extant research on special and inclusive music education *per se*. Instead, this article looks beyond these discussions through a conceptual focus aligned with the educational ideal of equity. In addition, we suggest that the social-model perspective is no less dichotomous as the starting point than the distinction between disability (social exclusion) and impairment (physical limitation) (Shakespeare, 2014). It may be that the medical model oversimplifies disability as an individual characteristic, while the social construction of disability remains at an analytical level without contributing to practical, everyday solutions for enhanced functioning (Anderberg, 2005; Vehmas & Watson, 2014).

Based on previous research in general education, some presuppositions can be made regarding the implementation of more inclusive music education or even going beyond it. Teachers' competence and ability to function within the realities of different situations are crucial for success (Haug, 2017). As Allan (2008) has concluded, 'There appears – to be deep uncertainty about how to create inclusive environments within schools and about how to teach inclusively' (p. 10). We suggest that the concept of reasonable accommodation may be an applicable construct in incorporating different paradigms to understand disability and promote equity at the practical levels of music education.

Accordingly, accommodation is central to the diverse ways in which disability is encountered in education (Michalko, 2008). The field of special education is grounded on the idea that specialised, adapted education is required to respond to students' educational needs. This applies even if one does not agree with Kauffman et al. (2017), who have stated that 'special education necessarily works with students who have failed or can be predicted very reliably to fail in general education' (p. 145). Accommodation addresses concerns about visibility, concealment, domination and neglect, which are essential factors when considering educational policy priorities and choices about disability.

The concept of reasonable accommodation in international human rights law and under Finland's Non-Discrimination Act

Reasonable accommodation refers to modifications or adjustments to an environment, educational or otherwise, that give individuals with disabilities an equal opportunity to participate. The UN Committee on Economic, Social and Cultural Rights stated back in 1994 (General Comment No. 5 on Persons with Disabilities) that

the obligation—to take positive action to reduce structural disadvantages and to give appropriate preferential treatment to people with disabilities—almost invariably means that additional resources will need to be made available for this purpose and that a wide range of specially tailored measures will be required.

The duty to accommodate was also applied in relation to the design of educational environments and curricula for disabled students in the case *Autism Europe v. France* (The European Committee of Social Rights, The Council of Europe, No. 13/2002) under the European Social Charter. The denial of an accommodation also violates the European Convention on Human Rights (Article 14) and the EU Charter of Fundamental Rights (Article 26). Therefore, although the CRPD represents a milestone in the development of the concept of reasonable accommodation, it has been evolving in various forums for many years (Lord & Brown, 2011, p. 282).

The obligation to provide reasonable accommodation as an individualised response to a disabled person's particular needs to ensure equal opportunities is defined in Article 5 of the CRPD. Article 24 also requires ensuring that people with disabilities have access to an inclusive education system, specifically insisting that 'reasonable accommodation of impairment and disability-related needs is provided at all levels of the education system' (Lord & Brown, 2011, p. 292). Due to the general obligation of non-discrimination and equality in the CRPD's Article 5 and as part of Article 24, reasonable accommodation concerns education. Disability-law scholars have argued that the specific articulation of the right to education in the CRPD (inclusive in the requirement for reasonable accommodation), provides an understanding of the right that is contextualised and disability-specific. For example, Lord and Brown (2011, pp. 293–297) believe that Article 24 of the CRPD will serve as a prominent guide for educational activities when its legal meaning is fully understood at both the international and national levels because the CRPD's substantive equality framework, including its reasonable accommodation concept, offers greater protection for those with disabilities than that which existed before CRPD in equality law.

The duty to provide reasonable accommodation fits into the general structure of the equality law and is an effective instrument to promote mutually adaptive, equality-oriented coexistence of the people with and without disabilities according to the principles of reasonability and proportionality. In many countries, the obligation to provide reasonable accommodation is directed through legislation that gives it a concrete national meaning. Therefore, to understand the practical potential of the concept, it must be studied on national and local levels. Article 8 of Finland's Non-Discrimination Act (1325/2014) states that 'denial of reasonable accommodation constitutes discrimination'. Article 15 of the same act describes the obligation to provide reasonable accommodation in the following way:

- (1) An authority, education provider, employer or provider of goods and services has to make due and appropriate adjustments necessary in each situation for a person with disabilities to be able, equally

with others, to deal with the authorities and gain access to education, work and generally available goods and services, as well as to manage their work tasks and to advance their career.

(2) In assessing the reasonableness of the adjustments, attention shall also be devoted, in addition to the needs of the person with disabilities, to the size, financial position, nature and extent of the operations of an actor, referred to in subsection 1, as well as the estimated costs of the adjustments and the support available for the adjustments.

When, under the Non-Discrimination Act, an accommodation's reasonableness is evaluated against the totality of the education provider's available resources, the government and municipalities hardly can claim that they do not have enough resources, as they have the right to levy taxes. Teachers in Finland are civil servants, so the Non-Discrimination Act must be interpreted in connection with general principles of administrative law. In other words, reasonable accommodations should be decided in collaboration with all involved parties, including parents. The decision must be elicited through a fair procedure (guided by the Administrative Procedure Act 434/2003) that must meet certain formal guarantees, including transparency. It is possible for a certain accommodation to be deemed unreasonable as long as everyone has been given the chance to present arguments and that these arguments were taken into consideration when making any accommodation decisions.

The concept of reasonable accommodation aims to shift the CRPD away from the dichotomies for which inclusion/exclusion often has been criticised (Lawson, 2008). The duty to provide reasonable accommodation is a context-dependent requirement that obliges authorities in the public and private sectors to recognise and remove barriers to equity (De Beco, 2019; Lawson, 2008). Accommodations refer to necessary and appropriate modifications that can make existing facilities and information accessible to the individual with a disability, such as modifying equipment, reorganising activities, adjusting curricula and teaching strategies, providing different forms of in-class communication, enlarging print, or enabling access to support personnel without disproportionate or undue burden. The emphasis on reasonable accommodation concerns the barriers involved in a particular case and, thus, the requirement to remedy specific circumstances with solutions appropriate to the situation. In practice, reasonable accommodations may require that cost-free changes be made to standard practices, but it also may require cost-intensive actions in terms of purchasing additional equipment or support, or creating improved physical access (Arnardóttir, 2011; De Beco, 2019; Lawson, 2008).

As the UN Committee on the Rights of Persons with Disabilities has stated (General Comment No. 6 on Equality and Non-Discrimination, adopted in 2018), the duty to provide reasonable accommodations, in accordance with the CRPD, can be divided into two parts. The first part imposes a positive legal obligation to provide reasonable accommodations to ensure that a person with a disability can enjoy or exercise her rights. The second part ensures that these required accommodations do not impose a disproportionate or undue burden on the duty bearer. According to the General Comment (pp. 7–8), the implementation of reasonable accommodation is guided by the following key elements:

- (a) Identifying and removing barriers that have an impact on the enjoyment of human rights for persons with disabilities, in dialogue with the person with a disability concerned;
- (b) Assessing whether an accommodation is feasible [. . .] – an accommodation that is legally or materially impossible is unfeasible;

- (c) Assessing whether the accommodation is [. . .] necessary and appropriate, or effective in ensuring the realisation of the right in question;
- (d) Assessing whether the modification imposes a disproportionate or undue burden on the duty bearer; the determination of whether a reasonable accommodation is disproportionate or unduly burdensome requires an assessment of the proportional relationship between the means employed and its aim, which is the enjoyment of the right concerned;
- (e) Ensuring that the reasonable accommodation is suitable to achieve the essential objective of the promotion of equality and the elimination of discrimination against persons with disabilities [. . .];
- (f) Ensuring that the persons with a disability more broadly do not bear the costs;
- (g) Ensuring that the burden of proof rests with the duty bearer who claims that his or her burden would be disproportionate or undue.

The duty for reasonable accommodation is enforceable from the moment an individual needs it in a given situation to enjoy her or his rights on an equal basis with others in a particular context. Legal scholars have debated whether the duty for reasonable accommodation legally arises upon request or once a duty bearer, such as a schoolteacher, becomes aware of the necessity (e.g., Ferri & Lawson, 2016). From the perspective of music education practice, it may be difficult or impossible to distinguish between the student's need for reasonable accommodations and the teacher's evaluation of such requirements. On one hand, it is the teacher's responsibility to ensure that modifications regarding physical or social environment, or academic requirements, are implemented and viewed as necessary to ensure equity in practice. On the other hand, reasonable accommodation does not discharge the student from developing competencies expected of all students. The duty to accommodate applies to both individuals and groups of students.

Reasonable accommodation differs from accessibility. The duty to provide accessibility is a proactive, systemic *ex ante* (predictive) duty. Accessibility must be built into systems and processes without regard to the needs of a particular person with a disability to acquire access on an equal basis with others. Conversely, as an *ex nunc* (from now on) duty, providing reasonable accommodation is an individualised, reactive duty that requires dialogue with the individual with a disability (De Beco, 2019; Kontinen, 2017). A reasonable accommodation also may exceed the boundaries of typical arrangements and common norms, but it does not denote that the circumstances in question should be exactly the same for everyone (Jansen et al., 2017; Lawson, 2008).

Since the CRPD specifically addresses education, if a disability affects a student's education, the educational institution must act to provide reasonable accommodations, beginning with interactive engagement to determine what kinds of accommodations would be suitable. This assessment of possible adjustments should be made in line with the objective of expanding the student's participation in all areas of school life (Quinlivan, 2015). Educators are required to recognise that individuals who have certain characteristics might confront disadvantage by the pedagogical and political conventions in educational systems. Reasonable accommodation can be anticipatory by focusing on potential barriers or reactive by focusing on barriers in a specific circumstance (Lawson, 2008).

Relying on the concept of reasonable accommodation is innovative in the context of music education because it obliges music education providers to take steps that enable disabled

students to fully participate in all music education by providing accommodations that do not place undue burdens on the education provider. The concept underlines teachers' duty to accommodate a disabled person in a particular case in the context of that person's individual circumstances, rather than anticipating the barriers that the school environment might pose to people with disabilities.

Equity issues and teacher autonomy in the Finnish context

In Finland, music education is provided in two principal contexts. First, music education is offered as part of general education in comprehensive schools (ages 7 to 15). This education is for the entire age group of students to support self-expression, personal growth and creative thinking (Korpela et al., 2010; Väkevää, 2015). Second, music education is provided by music schools that are part of the educational system of Basic Education in the Arts (BEA) (usually ages 5–20; in addition, early childhood music education is offered for younger children). Within BEA, music education is offered with the intention of teaching young people skills in self-expression and preparing them for vocational or higher-education programmes (Väkevää, 2015). At the level of legislation and curriculum design, both of these contexts are part of the basic educational system, which is publicly funded and aligned with the educational goals that Finnish National Board of Education (FNBE) sets.

In line with the principle of providing equal opportunities to all students, schools generally do not carry out a selection procedure for their students, and each student is assigned a place at a nearby school (although exceptions exist, for example, classes that provide special instruction in music or other arts). In Finnish comprehensive schools, students with learning disabilities usually participate with other students in art lessons taught in accordance with the national core curriculum through individualised study plans (cf. Kokko et al., 2014 on the education of students with significant developmental and cognitive disabilities in Finland). However, no research evidence exists on equity in practice, which entails, for example, the level of actual participation in classes among these students.

Even though weaknesses continue to exist regarding equity within comprehensive and upper-secondary-school music education, BEA music education is considered to be a special case in terms of equity within Finnish educational system (Väkevää et al., 2017). According to Väkevää et al. (2017), the historical development of the music education system has created 'a structure that shapes the students' access to BEA music studies and affects the relationship between supply and demand through public regulation' (p. 134). A central concern in terms of equity is the national core curriculum's structure, which is divided into basic and advanced sections.² Accordingly, and because of several implicit arrangements (including entrance examinations and teachers' insecurities about working with students who have disabilities), relatively few disabled students participate in BEA music education. The national core curriculum for BEA does offer avenues for equity through individualisation of studies and student-selection procedures, but these options seldom are employed in BEA music schools.³

All contexts in Finnish education system emphasise teacher autonomy, which means that teachers are neither guided by strict curricular definitions, nor evaluated through external or standardised measures (Sahlberg, 2015; Varjo & Kalalahti, 2019). After completing 4–5-year (master-level) teaching degrees, music educators in Finland are given wide latitude and opportunity to make their own decisions about teaching approaches, materials and student assessment. Officially, each municipality in Finland is responsible for crafting its own local curriculum for comprehensive and upper-secondary schools to guarantee that national laws and the

national core curriculum that National Board of Education sets are executed adequately. However, in practice, municipalities have delegated the responsibility to schools after ensuring that the most critical aspects of the curriculum are in harmony locally.

Each school's principal is responsible for the quality of teaching and serves as the pedagogical leader of that school, but teachers maintain considerable freedom in relation both to them and to the curriculum when organising their lesson plans. The absence of standardised tests allows teachers to teach what they think is important, and the curriculum does not specify that any learning standards be employed—only core content in each subject area to guide teachers in their autonomous pedagogical work.

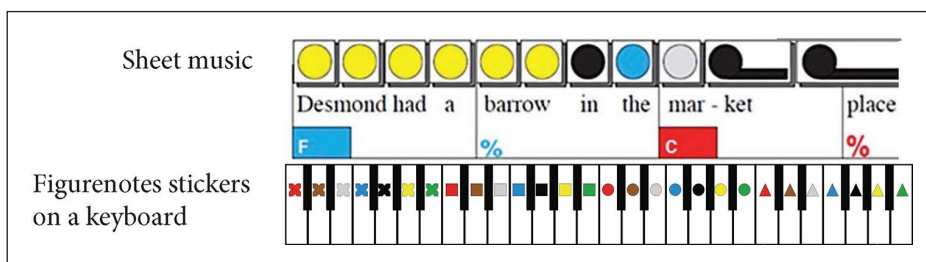
Three examples of reasonable accommodations in Finnish music education practice

To deepen previous theoretical analysis, we examine what reasonable accommodations look like in music education practice. The following three examples are drawn from the Finnish music education contexts of comprehensive school education and BEA education. They all are based on actual events, but do not rely on systematic empirical data collection. Before plunging into the empirical evaluations and assessments, music education researchers should—at least in Finnish context—deepen their theoretical understanding of reasonable accommodation. Reflecting the idea of ‘narrative as simultaneously storied presentation, representation, and meaning-making process’ (Barrett & Stauffer, 2009, p. 5), the following practical illustrations aim to provide perspectives on reasonable accommodation in both research and practice (cf. Odena, 2018 on the use of descriptive vignettes).

Figurenotes provides opportunities for students with cognitive and/or developmental disabilities

Figurenotes is a simplified notation system that music therapist Kaarlo Uusitalo and music educator Markku Kaikkonen invented in Finland during the 1990s (e.g., Kivijärvi, 2019). This system of notation uses colours, shapes and stickers to indicate pitch and was developed for use of music therapy and music education (see Figure 1). The system is being applied in approximately 15 countries outside Finland; for example, Drake Music Scotland brought Figurenotes to the United Kingdom in 2010 and developed it further, creating software and printed resources (Drake Music Scotland, 2019).

Figure 1. An example with ‘Ob-La-Di-Ob-La-Da’ by John Lennon and Paul McCartney, Kaikkonen and Uusitalo (2014).



In Finland, the development and application of Figurenotes was directly linked to the establishment of Resonaari Music Centre (Helsinki), founded in 1995, and authorities approved its use in BEA music education in 2004. Since then, Resonaari has broadened perspectives within BEA by providing opportunities especially for students with cognitive and/or developmental disabilities to receive music education following the BEA's advanced section. The Figurenotes system is also being applied in some comprehensive and BEA schools. However, Figurenotes' wider applicability remains unrecognised within Finnish music education.

The application of Figurenotes sheds light on the hegemony of Western standard music notation in music education, a system that is reinforced by the notation argument, which holds that decoding this system is in many cases a requirement for further musical learning (Fautley, 2017; Kivijärvi & Väkevä, 2020). In Finnish music education, this hegemony seems to stem from musical and pedagogical conventions, rather than from direct regulation of curricula. Neither the national core curriculum for comprehensive schools, nor the curriculum on BEA education specifically defines music notation's role in the music education offered in these contexts. The national core curriculum for comprehensive schools states that the goal 'is to help the student to understand the basic principles of how to notate music as part of music-making' (p. 142) and adds that 'as the [student's] capabilities develop, the concepts are named and either established or [the student's] own symbols are utilised to describe music' (p. 264) (FNBE, 2014). The BEA national core curriculum's advanced part states that 'the student should be guided to play by heart and to read and interpret the approaches of notation that are typical for the musical genre in question' and that the objective is 'to guide the student to develop his or her ability to read music notation and notate music' (p. 48) (FNBE, 2017).

These statements demonstrate that accommodation using Figurenotes is feasible in Finnish context, as no legal or administrative barriers to its use exist. Neither comprehensive schools nor BEA music schools have curricular restrictions on the application of notational systems other than Western standard music notation. Regarding reasonable accommodation, it can be suggested that the application of Figurenotes serves to accommodate notation concepts in the context of teacher autonomy.

In practice, this means that every teacher has autonomy to provide accommodation in music education using Figurenotes. Providing reasonable accommodation is an individualised and reactive duty, so the decision to use Figurenotes requires dialogue with individuals with disabilities. The objective of such dialogue should be to assess whether accommodations are necessary, appropriate and effective to ensure realisation of the equal right to music education. This negotiation could potentially include a discussion of the possibilities and challenges when studying music with Figurenotes. For instance, regarding repertoire selection, Figurenotes is typically applied with popular-music repertoire, and although it is very applicable in this context, it is not possible to play the most complex pieces of Western classical music with this system (Kivijärvi, 2019). Accordingly, negotiations on using Figurenotes should consider students' learning goals, which could include shifting to playing by ear or with Western standard music notation. If students want to proceed to a professional level of music education, it should be discussed with the student how certain boundaries when playing with Figurenotes may pose challenges at higher levels of music studies.

In reasonable accommodation, modifications impose a burden on the duty bearer. With Figurenotes, one burden can be teachers' capabilities in adopting a system of notation that they have not used. Figurenotes requires modifying instruments by putting stickers on them. Regarding the repertoire, teachers must use the sheet music provided in Figurenotes books, find

suitable sheet music to translate into Figurenotes or directly notate music using the system. Compulsory schools and music institutes generally are required to provide in-service education for teachers, who can be expected to enhance their capabilities and engagement in providing reasonable accommodations. Regarding the educational aspect, it might be beneficial for teacher education to cover the basics for different types of reasonable accommodations with Figurenotes and other notation systems.

Aligning with the concept of reasonable accommodation, using Figurenotes likely will not incur additional costs for students or institutions. Comprehensive schools provide the materials, and in BEA education, students already are required to buy sheet music for their studies. The Figurenotes notation books, on average, cost the same as any basic material for instrument studies. To support teachers' use of Figurenotes, they must programme their computers to support the Figurenotes notation system. However, institutions often provide such notation programmes for teachers to write their own sheet music.

A tablet computer as an instrument choice in a BEA music school for a person living with SMA

Spinal muscular atrophy (SMA) is a genetic condition. It causes issues with motor neurons that connect the brain and spinal cord. Basic movements, such as walking, sitting up and even breathing can be difficult for people with SMA. Accordingly, playing a musical instrument requires a level of dexterity and power that can be increasingly difficult to maintain with SMA. Through accommodation of instrument concepts, students who would not otherwise be able to participate, can do so. For example, it is possible to play nearly any instrument on a tablet computer (Chau et al., 2006). There has been interest in music and band activities among young people living with SMA in Finland. They have studied within BEA in Resonaari music school; in addition, patient associations have organised music education for their members (Uudenmaan lihastautiyhdistys, 2015).

The point of departure here is the conceptions of musical instruments that move beyond musical and pedagogical conventions in Finnish music education. Although music-technology studies have their own department in Sibelius Academy of the University of the Arts Helsinki, the country's most prestigious higher education institution for music, music education in comprehensive schools and BEA schools emphasises studying traditional musical instruments, which may lead to inequities for people incapable of playing such instruments.

The national core curriculum for comprehensive schools states that the students should be guided 'to develop their abilities in playing melody and rhythm instruments individually and as part of groups' (p. 265) and should 'further develop these skills' (p. 422). The advanced section of BEA national core curriculum holds that students should be guided 'to learn instrumental and joint playing skills so that [they are] able to play the instrument independently and that [their] expression is based on self-motivation' (p. 47).

Based on these statements, it can be concluded that the national core curricula do not restrict instrumental choices in music education in comprehensive and BEA schools. Regarding the use of tablet computers, *reasonable accommodation* refers to the accommodation of conceptions of musical instruments within the framework of teacher autonomy. Negotiation of reasonable accommodation may include practical issues, such as the possibilities and challenges of playing in groups with particular instruments. However, similar negotiations are part of studying any musical instrument. At the core is the negotiation of whether accommodation promotes equity and students' level of participation, which in this case seems to be fulfilling.

The institution might not incur any financial burden, as tablet computers are very affordable compared with many other instruments. In BEA education, students are responsible for equipping themselves with suitable instruments. The most burdensome aspect of accommodation may be providing in-service education for teachers, as digital instruments only recently have become part of music teachers' basic education (e.g., Juntunen, 2015). The lack of basic education in this field also can serve as a reason for refusing to provide such accommodations, particularly in BEA music education context, as teachers traditionally are expected to master only their own instruments.

A gifted student using a wheelchair in a comprehensive school class with a music emphasis

In Finland, as part of comprehensive school education, classes are offered with special emphases, such as music and other arts, languages and sports. In these classes, more teaching hours are spent on the emphasised subject than normally would be the case in a comprehensive school class. Typically, students must apply for classes with a special emphasis, which makes such classes dubious from the perspective of educational equity.

In summer 2017, Finnish media reported on twin sisters who reached the same school class with special emphasis on music class (HS, 2017). One of the sisters, who was a wheelchair user, was first denied access to class because the city of Espoo was unwilling to make the accommodations necessary for a wheelchair user. After intervention from the Non-Discrimination Ombudsman, the city of Espoo finally did the necessary, reasonable accommodations and both sisters joined the music class.

This example describes how a gifted student (in this context, this refers to the ability to pass the musical aptitude tests of the music-emphasis class) confronted discrimination when she could not gain access to the music classroom and its equipment. No legislative restrictions exist that would prevent the student from participating. In this case, *reasonable accommodation* refers to the financial investment needed to make the required physical adjustments that would guarantee equity in participation. As comprehensive schools are government-funded and thereby required to advance educational equity, no material conditions exist that would make reasonable accommodation unfeasible or impose any disproportionate or undue burden on the school.

Another issue in terms of reasonable accommodation is whether it is suitable to achieve participation in the music-emphasis class or whether other measures should be applied. In the first place, the school environment and its equipment should be accessible to everyone, but if it is not, then reasonable accommodations should be made as a reactive duty. Reasonable accommodations depend on the circumstances of a case. In this case, architectural barriers may need to be removed or altered to provide classroom accessibility. However, schools are not required to provide unreasonable structural changes that would impose an undue hardship. Instead, reasonable accommodations could include moving the music classroom to the ground floor of the school building or setting up a slope or elevator to provide access. Accommodations, in this case, could be no-cost accommodations, such as arranging instruments and other music classroom equipment to give those students using wheelchairs the ability to reach for and use them. Such accommodations could be cost-effective, such as attaching handrails near the ramps to enable students using wheelchairs to pull themselves up, as well as providing height adjustments for instruments or modified equipment controls for hand and foot operation. All accommodations should be negotiated with the person who needs reasonable accommodations, which, in this case, could entail joint evaluation, for example, whether providing access ramps or motorised lifts at entrances would be a preferred and reasonable accommodation.

Discussion and conclusion

The CRPD proclaims the right to equity in education, but the convention remains largely underexplored despite its importance in the education of people with disabilities (De Beco, 2019). While clarifying the CRPD's concept of reasonable accommodations in the present article, we have answered some questions concerning equity in music education. We have argued that the concept of reasonable accommodations can be applied to advance equity in music education policy processes.

Individuals' experiences of disabilities in music education contexts demand collective questioning of music education policies at various levels. Bell (2017) argues that the music educator should focus on developing musical ability; however, this responsibility should not fall solely on the individual music educator. Instead, the entire education system should contribute to promoting students' abilities. In education policies, accommodations can be linked to an understanding of the relationship between the educational means and ends.

An education system that meets the needs and objectives of students with disabilities has two important components: teachers and the institutional support they and their students receive. Teachers accommodate students with disabilities, and the school supports these accommodations. Teachers and the school system itself may pose barriers to realising equity in education or may be vehicles for cultural change. Whether equity in the education of students with disabilities is viewed as a problem or a goal depends on the tools available for teachers to accommodate students with disabilities.

The mind-set of the overall education system is also an important factor when advancing educational equity. Educational and institutional traditions might predetermine the efficacy of music education through strict curricular definitions, whereas another perspective might advocate for education practices to address the dynamism of students' experiences within their cultural contexts (Väkevä & Westerlund, 2007). Of course, education cannot be guided only by students' interests and desires; society's interests must also be considered (Vehmas, 2010).

Positioned within the music education field, reasonable accommodation aligns with theoretical frameworks in which the starting point of education is dynamism, reflexivity and criticality instead of so-called methodolatry (Regelski, 2002). Regarding moral reflexivity (Westerlund, 2019) and 'policymaking from below' (Shieh, 2020; see also Schmidt, 2020), reasonable accommodation may serve as a conceptual tool to address moments that require pedagogical experimentation and innovation. Moreover, reasonable accommodation offers a framework for discussing what is just and fair in specific educational situations.

We argue that in current music education policies, the concept of reasonable accommodation is required to prevent discrimination since the issues of equity and justice remain unrecognised in many ways. We suggest that over time, having equity as a starting point makes accommodations a natural part of ethical music education and renders the notion of reasonable accommodation redundant (cf. Allsup & Westerlund, 2012, on situational ethics).

In the discussion on how to implement reasonable accommodation in music education practices, we have attended to the issues of teacher autonomy and education equity. In the context of this article, the core from the students' perspective is not protection from curricular regulation because the curricula in Finnish comprehensive schools and BEA music education grant music teachers significant flexibility and autonomy. The practical illustrations presented in this article exemplify situations in which students would be able to develop their musical abilities in ways that current education structures and music education conventions do not intend or predict. Based on the analysis, the illustrations of music notation and instrument choice seem to be neutral towards all legislative, curriculum-related and other structural features in Finnish music education system, thereby allowing for reasonable accommodations.

And yet, teacher autonomy seems to be a double-edged sword in Finnish music education context. Autonomy allows teachers to be key agents in applying reasonable accommodation and developing equity in music education policy processes, but autonomy can also contribute to discrimination. The concept of reasonable accommodation offers not only students but also teachers and the school community conceptual tools to prevent implementation of disadvantageous musical and pedagogical conventions in local curricula and teachers' actions, which could otherwise lead to inequities.

Beyond Finnish context, the applicability of reasonable accommodation is especially connected to the value basis of education, strictness of curricula and understandings of educators' professionalism. In contexts that do not give teachers wide freedom to develop their practices and make pedagogical adaptations, reasonable accommodation can be used to justify such actions that depart from curricular instructions or pedagogical traditions, for example. Similarly, in such environments, students can have limited opportunities to influence pedagogical situations, and reasonable accommodation can build students' agency. From students' (and parents') perspectives, a potential drawback is the complexity of the concept, which emphasises teachers' responsibility to actualise reasonable accommodations.

In summary, music education policy-makers at various levels are currently expected to implement reasonable accommodations and evaluate their impacts. We believe that for research and assessment, policy-makers should not rush to make evaluations using research methods that presume a direct causal relationship between a primary problem (e.g., discrimination against persons with disabilities), a secondary problem (e.g., low levels of participation by students with disabilities in advanced music education) and a given solution (e.g., the use of reasonable accommodations) (cf. Gould, 2004). Future studies should evaluate and assess the effects on accommodations in music education for individuals with disabilities based on sound theoretical understandings of the reasonable accommodation concept. As Gould (2004) stated, a 'chain of influence' might be sought, instead of neat, linear, cause-and-effect relationships.

Consistent with perspectives in cultural disability studies, we have generally understood disability as a cultural and social phenomenon in this article. In context of music education, the understanding that education is primarily about interactions—in other words, it is a social phenomenon—implies that problems in education can be understood in terms of social arrangements rather than individual characteristics (Vehmas, 2010). Music educators, therefore, should assume the social responsibility to consider the sociocultural practices and norms of music education and music (performance) cultures and to examine how they contribute to pedagogical interactions and the experiences of individuals with disabilities in music-making and education. By simultaneously viewing disability as a very personal issue, an ordinary part of life and a result of social arrangements and discrimination, the social model of disability has encouraged efforts to extract disability from the special education field and to address concerns about disability in broad education policies and practices (Hakala et al., 2018; Shakespeare, 2014).

The disadvantages faced by many people with disabilities arise from the denial of social services and the failure of institutions to take responsibility for addressing disability-related concerns in education. Music education is not exempt from the need to provide reasonable accommodations to disabled students. Issues related to disabilities expose obligations related to equity in music education, so educators should have extensive understandings of pedagogy and policy to provide suitable accommodations in a variety of contexts according to situational needs.

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Notes

1. The authors have extensive working experience in the field of Finnish education. They have worked as, for example, music teacher educators at universities and thus followed the professional and public discourse regarding educational equity and inclusion. The second author is a member of Finland's National Non-Discrimination and Equality Tribunal, which monitors compliance with both the Non-Discrimination Act and the Equality Act. He is also a member of Finland's Human Rights Delegation, which is part of the monitoring process of Convention on Rights of People with Disabilities (CRPD) compliance in Finland.
2. As outlined by Finnish National Board of Education (2017), the advanced section aims to provide students with the competencies they need for vocational and higher education, whereas the basic section is more flexible and focused on promoting students' achievement of personal goals.
3. Recent reports on the development of BEA system indicate that the field should progress in regard to addressing the diversity of students through individualised learning, developing teachers' knowledge and skills and restructuring the curriculum (Aluehallintovirasto, 2014; Juntunen & Kivijärvi, 2019; Tiainen et al., 2012; Vismanen et al., 2016).

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