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THE DEVELOPMENT AND EVALUATION OF A PLANNING GUIDE AND INSERVICE TO ASSIST MIDDLE SCHOOL PERSONNEL IN SERVING STUDENTS WITH DISABILITIES VIA 504 PLANS

by

Aimee Miller

A Creative Project submitted in partial fulfillment of the requirements for the degree of
MASTER OF EDUCATION in
Special Education

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Abstract

Section 504 of the Rehabilitation Act of 1973 specifically prohibits the discrimination of individuals with disabilities who participate in federally funded programs, including public education. Public education is a major recipient of federal funds and has struggled to apply the law to their practice. As the Office of Civil Rights (the administrator of Section 504) became more rigorous in enforcing this legislation, schools became more frustrated with the vagueness of the requirements and the eligibility standards. To date, schools still lack explicit direction and instruction on how to help students that may qualify for added accommodations, but do not qualify for special education services under the Individuals with Disabilities Education Improvement Act. The purpose of this project was to (1) assess the knowledge and skills of personnel in a large urban junior high school regarding the identification of, and implementation of accommodations for, students with disabilities under Section 504, and (2) develop and evaluate a planning guide and inservice that will assist junior high school personnel in serving students with disabilities through 504 plans. The evaluation results suggest that the training was associated with improvements in teachers’ knowledge of the 504 identification and service delivery process as well as improvements in teachers’ ratings of their confidence in being able to identify and serve students with disabilities via a 504 plan.

Keywords: Section 504, teacher responsibilities
INTRODUCTION

In 1973, the Vocational Rehabilitation Act was signed into law by President Nixon and prohibited the discrimination of people with disabilities in the United States. Section 504 of this legislation specifically prohibits the discrimination of individuals with disabilities who participate in federally funded programs, including students with disabilities who attend public schools. Since the passage of this legislation, the effects on students with disabilities have been somewhat inconsistent due to confusion over the eligibility criteria and the fact that the mandates regarding serving school age children are not funded. School districts are required to serve students under Section 504 but often lack the direction to identify students and carry out a specified plan. Some districts have created specific positions to oversee the management of 504 Plans. Others gave the responsibility to administrators or counselors within each school. Ultimately, individual schools have the authority and directive to carry out Section 504 Plans, but school personnel often lack sufficient training or an understanding of the consequences of not following the mandate.

History of Section 504

The United States has always placed great importance on education as the medium in which an ordinary individual can achieve the American Dream. The equality of education has been somewhat inconsistent for minority groups, including individuals with disabilities, over the course of our country’s history. During the late 1800s, the United States experienced a large influx of immigration from Europe. These immigrants were typically non-English speaking, non-Protestant and uneducated. Citizens were afraid of the influences of these groups of new immigrants and embraced the philosophy
of Horace Mann which used common schools as the way to re-culture these immigrants and teach common values (Wright & Wright, 2012).

Schooling only worked if students attended classes which led to compulsory attendance laws and punishment for parents for not educating their children. Unfortunately, not all children were guaranteed an education. Special schools for “at-risk” students (delinquent students from urban slums) were created in the 1890s and focused on vocational skills. Other special schools focused on educating the deaf, blind and/or mute were often expensive and privately paid. Providing an appropriate education for students with learning disabilities, mental disabilities or behavioral difficulties was not addressed until after the Brown vs. board of education Supreme Court decision in 1954. With that monumental decision, segregation of race in education was ruled illegal.

Soon after, parents of disabled students began to see the similarities between discrimination in race and discrimination according to ability. These parents started to bring suit against school districts for segregating their children in ill-equipped schools and classrooms.

After a myriad of legal battles, Congress passed the Elementary and Secondary Education Act of 1965 (ESEA). This legislation aimed to help disadvantaged children obtain higher levels of proficiency and provided resources to ensure that underprivileged children had access to quality education. In 1966 ESEA was expanded to include “handicapped children” (Wright & Wright, 2012). This act started the federal government’s active role in helping students with disabilities (Hales, n.d.).

In addition to the ESEA, two Supreme Court cases continued the fight for equality for students with disabilities in public education. PARC (Pennsylvania Association for
Retarded Children v. Commonwealth of Pennsylvania) dealt with the exclusion of mentally retarded students in public schools. The courts decided that parents must have a role in determining student placement and there must be a means to resolve disputes. The other case that was influential in increasing the government’s role in the education of disabled students was Mills v. Board of Education of District of Columbia. While the case centered on the high cost of educating disabled students, the decision dealt more with providing disabled student due process when being suspended, expelled, or transferred.

These cases led Congress to conduct a series of investigations in 1972 regarding the quality of education for students with disabilities. This investigation found that from the 8 million children with “handicapping conditions requiring special education and related services, only 3.9 million such children are receiving an appropriate education” (Wright & Wright, 2012). Public Law 94-142, the Education for All Handicapped Children Act was enacted in 1975 and ensured that students with disabilities received an appropriate education, due process of law and procedural safeguards (Wright & Wright, 2012). This legislation, which is currently referred to as the Individuals with Disabilities Education Improvement Act (IDEIA), provides intensive individualized special education services to any school age student with a disability who, without such services, would not be able to benefit from his or her public education experience. This legislation provides some funding to schools for provision of these services.

Concurrently, the courts dealt with court cases centering on discrimination of persons with disabilities. These cases led to the passage of the Vocational Rehabilitation Act of 1973. This act reauthorized many of the grants states could apply for regarding
vocational rehabilitation programs and other federal programs. It also prohibited the discrimination of individuals with disabilities from any program that received federal aid through Section 504 of the act, including school-age children with disabilities in public education. The law was left broad and without few specifics which made it difficult for states to comply uniformly. “In 1976, the U.S. Department of Health, Education and Welfare began in earnest to push for enforcement of the Vocational Rehabilitation Act of 1973 and its Section 504” (Hales, n.d.). By late 1977, regulations requiring compliance with both Section 504 and IDEA were set in place.

The main focus of the act was in the employment sector, and few schools felt the need to provide more specialized services than they were currently providing. “As such, the law was largely ignored in the public schools until the 1990s, as many administrators worked under the assumption that compliance with the Individuals with Disabilities Act (IDEA) would satisfactorily meet the needs of all students with disabilities” (Madaus & Shaw, 2008). However, many students with disabilities who do not qualify for the more intensive special education services provided through the IDEA are eligible for accommodations under Section 504. In 1991, the Office for Civil Rights issued a memo reminding educators of their responsibilities regarding Section 504 and became more proactive about enforcing accommodations for disabled students (Madaus & Shaw, 2008).

More recently, in November 2008, Congress passed the Americans with Disabilities Act (ADA) Amendments (ADAA) which expanded the eligibility for students who qualify for Section 504 Plans (Zirkel, 2009). To this day, there continues to exist difficulties in disseminating this new information to the professionals who are charged with implementing this mandate.
Section 504 Eligibility and Requirements

To qualify for services under Section 504, an individual must meet a three prong definition. To be considered an individual with a disability, the individual must have (1) a physical or mental impairment that (2) substantially limits (3) one or more major life activities. Most schools and education officials agree with what a “physical or mental impairment” may look like. But “substantially limits” and “major life activities” have varying definitions that were often left to broad interpretation. “The second and third prongs are respectively for individuals who, although not currently meeting these three criteria, have either “a record of” or are “regarded as” meeting them” (Zirkel, 2011).

Under the ADAA, there were no changes to the interpretive standards to the first prong of the definition.

...Section 504 allows for a wide range of mental and physical impairments defined in the Diagnostic and Statistical Manual of Mental Disorders, Fourth Edition, (DSM IV; American Psychiatric Association, 200) or other recognized medical, psychological, or educational sources. Examples continue to extend from a wide variety of learning-related impairments, such as attention deficit hyperactivity disorder (ADHD) and dyslexia, to a similarly broad range of health-related impairments, such as diabetes and food allergies (Zirkel, 2009).

The ADAA did expand the interpretations of the second and third prongs of Section 504. In the past, the Supreme Court severely limited the interpretation of the second prong. Most decisions had to be made considering mitigating circumstances, such as medication or corrective devices. Under the more recent legislation, those mitigating circumstances have been removed and students need to be evaluated when their conditions are the most active. “The interpretation should give the benefit of doubt to eligibility rather than the reverse” (Zirkel, 2009).
The “major life activities” prong was also expanded to include more than just walking, seeing, hearing and learning. The new amendment added concentrating, reading, and thinking to learning-centered impairments. Physical-related impairments were also expanded to include bowel, bladder, and digestive functions. “The overall effect is obviously to expand the number and range of students eligible under Section 504” (Zirkel, 2009).

**Teacher Responsibilities Regarding Section 504**

Due to the unclear communication of Section 504 regulations, teacher responsibilities regarding Section 504 are often vague and can vary from district to district. One of the characteristics that is often most misunderstood is the difference between Section 504 and IDEA. “Section 504 is not special education legislation. Instead, it is civil rights legislation, and although special educators may be involved in providing Section 504 services, the law is the purview of the general education community” (Madaus & Shaw, 2009). Despite being a general education directive, Madaus and Shaw found in a 2006 study that nearly two-thirds (66%) of Section 504 coordinator duties fell to the special education director. Rather than taking a controlling role in the process, special education teachers can provide coordination and consultation to general education teachers in creating successful 504 Plans for students (Zirkel, 2009).

One of the major teacher responsibilities regarding Section 504 is that of identification. “The expanding effect of the ADAA reinforces the lesson that determining eligibility and providing the resulting reasonable accommodations in terms of a free and appropriate public education (FAPE) under Section 504 is primarily the responsibility of teachers and administrators in general education” (Zirkel, 2009).
Identification is more than just pointing out students with visible impairments. Students can also qualify for services via 504 Plans if there is even the suspicion of a disability. If the suspicion was noted and not addressed, the school can be held liable for discriminating against the student.

In addition to identification, regular education teachers are responsible for providing meaningful accommodations to students served under 504 Plans. These accommodations may look similar to those provided by an IEP. Many educators feel that 504 Plans are “consolation prizes” for those students who fail to qualify under IDEA, but have legitimate impairments that affect their ability to succeed in school without accommodations (Zirkel, 2009).

The problem with the lack of knowledge among educators often lies within teacher preparation programs regarding their responsibilities for Section 504 as well as professional development opportunities within their respective districts. Madaus and Shaw (2008) found that “many districts did not provide training to personnel on Section 504 procedures to staff.” In addition, the study found that while most states require a special education or inclusion course for educators to be certified to work in schools, the texts that are used in these courses have limited information on how to implement 504 Plans in the classroom (Shaw & Madaus, 2008). Shaw and Madaus raised the question about whether school personnel have the necessary skills and knowledge base to effectively implement 504 Plans and accommodations.

**Purpose Statement and Evaluation Questions**

Since its creation and implementation, Section 504 has been difficult to monitor and enforce in individual settings. Because the impetus for the law focused more on the
employment arena rather than education, many districts felt that their students with disabilities were being appropriately served under the IDEA. Since the 1990s, an increased awareness among districts and teacher preparation programs has brought Section 504 to center stage, due in part to the fact that the Office of Civil Rights has enforced Section 504 regulations more consistently. Despite the increased importance placed on serving students with disabilities in public education, teachers continue to remain confused about their role in identifying students and providing accommodations.

In an attempt to provide guidance on these issues, Granite School District, a large school district located on the Wasatch Front in Utah, provided training on Section 504 for designated 504 coordinators and school-based administrators at the beginning of the 2012-2013 school year. This training discussed recent legal proceedings against the district by the Office of Civil Rights (OCR), specific district policies regarding the identification of students under Section 504, and the development and implementation of 504 Plans. The training also emphasized the importance of training student support teams (SST), counselors, administrators, and teachers in knowing how to identify and serve students who may qualify under Section 504 but left the details to each school.

Teachers at Valley Junior High School, where I completed my administrative internship, expressed confusion about the process and their role in identifying and serving students with disabilities via 504 plans even though they had participated in the district training.

Another area of concern at this middle school was that the number of students with disabilities who are served via 504 plans (.03%) was well below the national average of
1% cited by Zirkel (2011). This would suggest that students who are in need of accommodations might not be receiving them.

Therefore, the purpose of this project was to develop and evaluate an inservice training and planning guide to assist the faculty at this junior high school in Granite School District in identifying students who are eligible for services under Section 504 of the Vocational Rehabilitation Act, and developing and implementing accommodation plans for those students. The specific evaluation question that was addressed through this project is:

To what extent was the inservice training on the 504 Planning Guide associated with improvements in the school personnel reported knowledge about identifying and serving students with disabilities via the 504 process.

Method

Participants and Setting

All of the general education and special education faculty (N=64) at Valley Junior High School in Granite School District were invited to participate in the project. The middle school serves grades 7 through 9 and has 976 students. Of those students there are 86 students with identified disabilities (8%) that are served under the IDEIA with IEPs and 3 students with identified disabilities (0.3%) are being served via Section 504 Plans. The pre- and post-training questionnaire, and training on the 504 Planning Guide was administered during regularly scheduled faculty meetings at the middle school.

There were 46 teachers who responded to the invitation to participate and complete the pre-training questionnaire, inservice training, and post-training questionnaire. Participants were asked to identify themselves according to school role and
years of service. General education teachers (N=40) made up 87% of respondents and special education teachers (N=6) made up 13% of the total.

With respect to years of service, groups were more evenly distributed. No respondent was in their first year of teaching. There were 9 participants with 1-5 years of service, 16 individuals with 5-10 years, 19 respondents were between 10-20 years of service, and 12 individuals had more than 20 years of service.

With respect to 504 training in their preservice training program, only two special education teachers indicated that they had received 504 training in their preservice preparation program, and ten out of forty general education teachers indicated that they had any preservice instruction on the 504 process.

**Dependent Variables and Response Measurement**

The dependent variables in this project was teachers’ ratings of their knowledge about identifying and serving students with disabilities under Section 504. To measure this, a questionnaire was developed to determine the extent to which faculty reported knowledge about identifying and serving students with disabilities via 504 plans. The questionnaire was also administered after the inservice training to determine the extent to which the training improved teachers’ ratings of their knowledge about the 504 process.

**Evaluation Design**

A pre-experimental pre-test, post-test single case design (Yin, 2009) was used to evaluate the effects of the inservice training on school personnel knowledge of the Section 504 eligibility and service delivery process and ratings of confidence in identifying and serving students with disabilities via a 504 plan.
Procedures

Step 1: Questionnaire Development and Validation. A questionnaire was developed based on the instruments used in the Madaus and Shaw (2008) and Shaw and Madaus (2008) studies. Information provided to school district administrators and 504 coordinators during a Utah State Office of Education (USOE) training in September of 2012 (http://www.schools.utah.gov/equity/Section-504-Training.aspx) was also used. After the questionnaire was developed, an expert review of the questionnaire was conducted by Jennifer Slade, Education Specialist/Section 504 Monitoring Officer for the USOE. Based on expert reviewer feedback, the questionnaire was revised and placed on SurveyMonkey™.

The revised questionnaire includes two questions about the type of teaching, administrative, or related service position held and the number of years experience, and that information is included in the Participants and Setting section of this paper. The third question, or statement, asked respondents to indicate the extent to which their preservice preparation program included Section 504 training. The next seven statements in the questionnaire related to the teachers' ratings of whether they had adequate knowledge about the Section 504 process. For the first four of these, respondents could respond to the statement with Strongly Disagree, Disagree, Neither Agree nor Disagree, Agree and Strongly Agree. The second set of three statements required a “Yes,” “No,” or “Kind Of” response. The last two statements relate to when participants had previously received inservice training or information about 504 procedures and whether they would like to receive future inservice training. The revised questionnaire is included in Appendix A.
Step 2: Pre-Training Questionnaire Administration. All teachers from the participating school were sent the SurveyMonkey invitation via email to complete the revised questionnaire, and teachers were asked to respond within one week. Fifty seven teachers responded to the questionnaire. Results were then tabulated within SurveyMonkey.

Step 3: Planning Guide/Inservice Training Development. A 504 Planning Guide (Appendix B) was developed to (1) provide teachers with specific steps for identifying students that might be eligible for Section 504 Plans, (2) provide teachers with step by step training in their role during the 504 qualification and accommodation process. To provide the teachers with instructions on how to use the guide, a power point presentation (Appendix C) was developed for use during a regularly scheduled faculty meeting. Particular attention was given to the focus areas that were identified as a result of questionnaire results as well as the 2012 USOE guidelines for provision of 504 services.

Step 4: Inservice Training on the Use of the Planning Guide. A 45 minute inservice training was conducted on a Granite School District early-out day in May of 2013. Only general education and special education teachers were present. The training began with a review of the questionnaire results and the distribution of the planning guide. Next, I reviewed each step included in the planning guide and provided examples for how each step is conducted. At the end of the training had been delivered to school personnel, the post-training questionnaire was administered.

Results

The purpose of this project was to develop and evaluate an inservice training and planning guide to assist the faculty at this junior high school in Granite School District in
identifying students who are eligible for services under Section 504 of the Vocational Rehabilitation Act, and developing and implementing accommodation plans for those students. The specific evaluation question that was addressed through this project was:

To what extent was the inservice training on the 504 Planning Guide associated with improvements in teachers’ knowledge about identifying and serving students with disabilities via the 504 process. The following sections include the pre- and post-training results for questions 4 through 10 on the questionnaire.

Statement #4 asked teachers to rate their familiarity with 504 procedures. Prior to the inservice training, 48% of general education teachers and 29% of special education teachers responded to this statement with an “Agree” or “Strongly Agree” ratings. After the inservice training, 86% of the general education teachers and 100% of the special education teachers rating their familiarity with these procedures as “Agree” or “Strongly Agree.” These data are presented in Figure 1.

Statement #5 asked teachers to indicate whether they knew who the 504 monitor in their building was. Prior to the inservice training, 83% of general education teachers and 38% of special education teachers responded to this statement with an “Agree” or “Strongly Agree” ratings. After the inservice training, 100% of the general education teachers and 43% of the special education teachers rating their familiarity with these procedures as “Agree” or “Strongly Agree.” These data are presented in Figure 2.

Statement #6 asked teachers to indicate the extent to which they understood the difference between the type of student who would be covered by a 504 plan and students who would be covered under the Individuals with Disabilities Education Act (IDEA). Prior to the inservice training, 72% of general education teachers and 43% of special
education teachers responded to this statement with an “Agree” or “Strongly Agree” ratings. After the inservice training, 75% of the general education teachers and 43% of the special education teachers rating their familiarity with these procedures as “Agree” or “Strongly Agree.” These data are presented in Figure 3.

Statement #7 asked teachers to indicate the extent to which they felt they were responsible for identifying eligible 504 students, providing accommodations for students, creating and writing 504 plans, participating in 504 meetings, and conducting the meeting. Prior to the inservice training, general education teachers responded with “Agree” or “Disagree” as follows: identifying eligible 504 students (18%), providing accommodations for students (93%), creating and writing 504 plans (0%), participating in 504 meetings (55%), and conducting the meeting (0%). After the inservice, general education teachers responded as follows: identifying eligible 504 students (100%), providing accommodations for students (97%), creating and writing 504 plans (76%), participating in 504 meetings (100%), and conducting the meeting (21%). Prior to the inservice training, special education teachers responded with “Agree” or “Disagree” as follows: identifying eligible 504 students (14%), providing accommodations for students (43%), creating and writing 504 plans (0%), participating in 504 meetings (57%), and conducting the meeting (0%). After the inservice, general education teachers responded as follows: identifying eligible 504 students (25%), providing accommodations for students (25%), creating and writing 504 plans (0%), participating in 504 meetings (25%), and conducting the meeting (0%). These data are presented in Figures 4 and 5.

Statement #8 asked teachers to indicate whether they knew who would qualify for a 504 plan. Prior to the inservice training, 15% of general education teachers and 43% of
special education teachers indicated that they did know who would qualify. After the inservice training, 28% of the general education teachers and 75% of the special education teachers indicated that they knew who would qualify. These data are presented in Figures 6 and 7.

Statement #9 asked teachers to indicate whether they knew how to refer a child for a 504 plan. Prior to the inservice training, 23% of general education teachers and 29% of special education teachers indicated that they did know who would qualify. After the inservice training, 66% of the general education teachers and 75% of the special education teachers indicated that they knew who would qualify. These data are presented in Figures 8 and 9.

Statement #10 asked teachers to indicate whether they knew who to ask to get information on a 504 plan, i.e., who would be able to provide clarification on specific accommodations and how to implement them. Prior to the inservice training, 55% of general education teachers and 29% of special education teachers indicated that they did know who would qualify. After the inservice training, 83% of the general education teachers and 100% of the special education teachers indicated that they knew who would qualify. These data are presented in Figures 10 and 11.

The final two questions centered on when respondents had participated in the last in-service training regarding Section 504 and whether they would be interested in receiving more information about the topic. The majority of all respondents indicated that they had never received in-service training on Section 504 (60%) and that they would be interested in receiving additional information or training on those matters (58%).
Discussion

The purpose of this project was to evaluate special education and general education teachers' reported knowledge about the 504 eligibility and service delivery process at one junior high school. Overall, teachers reported that they received very little training in their preservice teacher preparation programs, and 60% of the teachers who participated in this project reported that they had not received any inservice training on the 504 process. There was very little difference between general education and special education teachers, which would suggest that all preservice teacher preparation programs need to include more information in their curricula on 504 eligibility and service delivery.

In terms of what teachers did know, general education teachers rated their understanding of the eligibility process and knowledge of the 504 monitor in the building as very low. They also did not indicate that they were responsible for participating in the writing of the 504 plan, although they did indicate that they were the teachers who needed to implement the accommodations. This is disturbing because general education teachers are the school personnel who have direct contact with students who are not receiving services but may need them, and general education teachers may be more invested in implementing accommodations if they are actively involved in writing the 504 plans. Special education teachers reported a higher degree of understanding about the 504 process and who might qualify, and this may be because some students who do not meet the eligibility criteria for IDEIA services are referred for a 504 plan. However, they were not as confident in their understanding about what exactly distinguishes an IDEIA eligible student from a 504 eligible, and may be an important distinction to include in preservice programs.
Overall, the inservice training appeared to be effective in both educating the teachers about identifying students who might qualify for 504 services and their role in providing those services. In all areas both general education teachers and special education teachers' post-training ratings improved in being able to identify students, refer those students, and gain information about 504 Plans. One of the greatest increases was in the general education teachers' rating related to referring students for 504 Plans (43%). In addition, the familiarity of general education teachers with 504 procedures also increased.

One of the areas that also showed a significant amount of growth was the awareness of the responsibilities of general education and special education teachers regarding 504 procedures. The mean pre-training survey rating regarding the general education teacher's responsibility for identifying students who might be eligible for a 504 plan was 18% "Agree" or "Strongly Agree", and the post-training mean rating was 100%. General education teachers' ratings relative to their responsibility for participating in the development of the 504 plan increased from 0% "Agree" or "Strongly Agree" to 76%, and their ratings relative to participating in 504 meetings increased from 55% to 100%. It is interesting to note that many general education and special education teachers thought that 504 plans were the responsibility of the special education teacher, and in fact, several special education teachers mentioned during the inservice that they had been given that responsibility. Although this is anecdotal information, it may suggest that administrators need more training in this area.

There were a few areas, while showing some growth, did not show as much growth as anticipated. For example, when general education teachers were asked after
the in-service if they knew who qualified for 504 services; the “yes” category only grew by 13%. The other two categories, “maybe” and “no”, decreased slightly (“maybe” decreased from 70% to 66% and “no” decreased from 15% to 7%). This was the area in the in-service that received the most questions and the most comments. Several teachers had questions about the nuances of the qualifications. Unfortunately, due to the nature of the law, the definitions, and the circumstances in which a student may find him/herself, a cut-and-dry answer was not readily available. This only increased the teachers’ frustration with the topic and was reflected in their post-assessment survey as well as comments made to the trainer.

Another category that received little growth was the respondent’s knowledge in being able to find information on a 504 Plan. General education teachers only increased from 55% to 83%, an increase of 28%. “No” decreased from 20% to 14% and “maybe” decreased from 25% to 3%. This area was briefly covered during the training, but was specifically outlined in the planning guide given to each participant at the beginning of the in-service.

There are several things that could have been changed to make this in-service more effective. First, many participants commented that this profession development opportunity would have been more effective if it had been given at the beginning of the school year. Because it occurred two weeks before school ended for the year, many teachers were physically and mentally tired of dealing with school-related topics.

Another factor that influenced the results of this survey was that participants were required to attend by the principal of the school. Due to the interest in the subject by both the school administration and district personnel, faculty at the school were required to
attend as part of their weekly Friday professional development opportunities. Attitudes could have been influenced by the mandatory nature of the in-service rather than being something that was completely voluntary.

A final factor that influenced respondents' confidence was the length of the training. While originally planned to be a two-hour training, the time provided by school administration (and mandated by district policy) only allowed for 45 minutes. There was quite a lot of information that had to be condensed into a shortened time slot which affected both the quality and scope of the training. With more time, respondents would be able to better familiarize themselves with how students qualify for 504 services and their roles within those services.

**Future Implications**

There are many future implications from this study. First of all, there is a definitive need for a dissemination of information regarding Section 504 procedures to all school staff. From the Needs Assessment survey, all teachers (both general education teachers and special education teachers) indicated that it had been some time since their last 504 Training, if ever. The majority of those teachers were also interested in receiving more training. From fielding comments during the in-service teachers felt that this information would be more helpful at the beginning of the school year, preferably during the before-school in-service meetings that are typically scheduled a few days before school starts.

It would also be interesting to determine the effectiveness of 504 plans. After the training, one very vocal teacher expressed concern about the extra work the entire process added to her already full plate. She wanted to be honest and said that while she agreed
with the purpose of the legislation, she didn't see how she would have time to fulfill her responsibilities. Perhaps if teachers were able to see how 504 plans assist students with disabilities and could be provided data that shows those effects, they might be more willing to participate in the process.

In addition to the need for a timely training, the in-service itself needs to be explicit and include step-by-step instructions on how students qualify, how to start the referral process, and other specifics central to the different roles in the 504 Plan process. There also needs to be an emphasis that the 504 process can be a collaboration between general education faculty and special education faculty. While it is a general education mandate, special education teachers have a vast wealth of knowledge concerning data collection, accommodation ideas, and strategies to modify the environment and curriculum. If the 504 process can be thought of a team effort, it can be that much more powerful.

Individual monitors need to be introduced to staff and given attention throughout the school year in order for staff to become familiar with their job and how they can help. They need to take a more active role throughout the school. For example, the monitor could participate in PLC meetings or specific team meetings that are called to identify at-risk students. Monitors need to foster more awareness in their faculties concerning the identification and referral process in their schools.

Finally, throughout this process it was found that it would be helpful if schools had a specific referral process that is explained explicitly so that all faculty know how to refer a student for additional services. Schools need to identify how the referral process will work for them and communicate that to staff.
References


APPENDIX A:

Section 504 Needs Assessment
## Section 504 Needs Assessment

1. I am a...
   - Counselor
   - School Support Staff
   - General Education teacher
   - Special Education teacher
   - Administrator

2. I have been working in education for:
   - less than a year
   - 1-5 years
   - 5-10 years
   - 10-20 years
   - more than 20 years

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<th></th>
<th>Strongly Disagree</th>
<th>Disagree</th>
<th>Neither agree nor disagree</th>
<th>Agree</th>
<th>Strongly Agree</th>
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<td>3</td>
<td>I received Section 504 training in my teacher preparation program.</td>
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<td>4</td>
<td>I am familiar with Section 504 procedures.</td>
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<td>5</td>
<td>I know who the Section 504 monitor is in our building.</td>
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<td>6</td>
<td>I can explain the difference between students covered by Section 504 and students protected under IDEA (Special Education).</td>
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7. My responsibilities regarding Section 504 are: (choose all that apply)
   - Identifying eligible students
   - Providing accommodations for students
   - Writing 504 Plans
   - Participating in 504 Plan meetings
   - Conducting 504 meetings

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<td></td>
<td>Yes</td>
<td>Kind of</td>
<td>No</td>
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<td>8</td>
<td>I know who qualifies for a 504 Plan</td>
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<td>9</td>
<td>I know how to refer a child for a 504 Plan</td>
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</tr>
<tr>
<td>10</td>
<td>I know who to ask to get information on a 504 Plan</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11. When was the last time you received an in-service training on Section 504?
   - This current academic year
   - Last year
   - 2 to 5 years ago
   - More than 5 years ago
   - I have never attended a training on Section 504

<table>
<thead>
<tr>
<th></th>
<th>2</th>
<th>1</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>Maybe</td>
<td>No</td>
</tr>
<tr>
<td>12</td>
<td>I would like to receive additional training/information on Section 504.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX B:

Inservice Power Point Presentation
Section 504
Teacher Responsibilities

Objectives

Language Objective:
Participants will be able to show a significant improvement in their understanding of Section 504 responsibilities by taking a training pre-test and showing growth on the post-test.

Content Objective:
Participants will be able to describe their individual responsibilities regarding Section 504.

Where did Section 504 come from?
Based in the Rehabilitation Act of 1976, Section 504 deals specifically with discrimination in programs that accept federal funding.

Why is it important?
Administered out of the Office of Civil Rights (OCR), districts, schools and individuals can be found in violation of federal law by not identifying students who would benefit from 504 Plans as well as not complying with written 504 Plans.

What do I need to know about 504?
504 Plans are a GENERAL EDUCATION responsibility, not a Special Education responsibility. This means that identification, interventions, meetings, and accommodations are all done by General Education Teachers/Staff.

School Responsibilities
**General Responsibilities:**
- Identifying Students
- Providing Interventions/Accommodations
- Participating in 504 Meetings
- 504 Monitor/Administrator Responsibilities:
  - Write 504 Plans
  - Conduct 504 Meetings

**Child Find**—identifying those students who are eligible under Section 504.
- Students are eligible if they are "qualified" (meet 4 requirements) and "handicapped".
- To be considered handicapped, a student must have a physical or mental impairment that significantly limits one or more major life activities.
- The student must have a record of the disability.
- The disability is supported by evidence.

**Physical or Mental Impairment**
- A physical or mental impairment must either have an accompanying doctor's diagnosis or be found in the DSM IV.
- Students still qualify if in remission.
- Students still qualify if it is only seasonal.
- Students still qualify if they are on medication to treat the issue.
- While it excludes illegal drug users (unless they are in rehab and no longer using), it includes alcohol users.

**Significantly Limits**
- Means that they can't perform an activity that a general member of the population could perform.
- Also applies if the "condition, manner, or duration" of performing a major life activity is affected.

**Major Life Activity**
- Means that a student is capable of being substantially limited in a major life activity.

**How do I Identify a Student?**
- If you suspect a student is eligible for a 504 Plan, follow these steps:
  1. Collect information from your class (e.g., teacher, social worker, student, parents).
  2. Bring the information to your school counselor or the 504 coordinator.
  3. The school will gather additional information and submit a 504 application.
  4. Students or their parents must sign the consent for services.

**Major Life Activities:**
- The list of examples is not exhaustive.
- Other functions may be considered major life activities.
"When asked to provide interventions, it is IMPERATIVE that we ask to hear how it's working. If part of the actual 504 Plan, teachers are accountable for providing what is listed in the plan."

"This is the teacher's opportunity to give input into the 504 Plan—especially regarding what accommodations will take place in the classroom."

"Content Objective:
Participants will be able to describe their individual responsibilities regarding Section 504."

"Language Objective:
Participants will be able to show their understanding of their 504 responsibility by taking a training pre-test and showing growth from the beginning of the training."

"Objectives"
APPENDIX C:

504 Planning Guide
Teacher Responsibilities Regarding Section 504 Planning Guide

What is it?

- Based in the Rehabilitation Act of 1976, Section 504 deals specifically with discrimination in programs that accept federal funding.
- Students with a known or suspected disability are eligible for accommodations to their schooling in order to “level the playing field”—known as a 504 plan.
- 504 Plans are a GENERAL EDUCATION responsibility, not a Special Education responsibility.

How does it affect me?

- As an educational professional, you are part of the “child find” mandate.
- Administered out of the Office of Civil Rights (OCR); districts, schools and individuals can be found in violation of federal law by not identifying students who would benefit from 504 Plans as well as not complying with written 504 Plans.

Who qualifies?

- Students are eligible if they are “qualified” (meet the requirements) and “handicapped”.
- To be considered handicapped, a student must have a physical or mental impairment that significantly limits one or more major life activities*.

If I suspect a student may qualify, what do I do?

- If you suspect a student is eligible for a 504 Plan, follow these steps:
  1. Collect information from your class. (Test scores, work samples, office referrals, etc.)
  2. Bring the information to the corresponding team (Literacy, Numeracy, UBI for behavior).
  3. The team will collect additional information and either refer to MTSS team for further review or return referral to classroom.
  4. Be ready (and willing) to participate in interventions with fidelity!

What do I do with a 504 Plan?

- A 504 Plan is an individualized plan tailor-made to give a student better access to his or her education.
- You are responsible for assuring that the accommodations detailed within are provided to the student.
If I have further questions, who do I talk to?

- There are several people you can speak with for further questions:
  - School 504 Coordinator: Shauna States, Assistant Principal
    states@graniteschools.org
  - District 504 Coordinator: Charlene Lui, Director of Educational Equity
    clui@graniteschools.org
  - State 504 Coordinator: Jennifer Slade, Education Specialist
    Jennifer.slade@schools.utah.gov

*Refer to Training Power Point for detailed explanation of disabilities, physical or mental impairments, and major life activities.*
Figures
I am familiar with 504 procedures.

Figure 1: Pre and post ratings of “Agree” or “Strongly Agree” ratings of familiarity with Section 504 procedures.
I know who the Section 504 monitor is in our building.

- Pre
- Post

<table>
<thead>
<tr>
<th></th>
<th>General Ed</th>
<th>SPED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre</td>
<td>38%</td>
<td>43%</td>
</tr>
<tr>
<td>Post</td>
<td>83%</td>
<td>100%</td>
</tr>
</tbody>
</table>

Figure 2: Pre and post ratings of “Agree” or “Strongly Agree” ratings of knowing who the 504 monitor is.
I can explain the difference between students covered by Section 504 and student protected under IDEA.

Figure 3: Pre and post ratings of “Agree” or “Strongly Agree” ratings of knowledge of the difference between 504 and IDEA students.
My responsibilities regarding Section 504 are: (choose all that apply)

General Education

<table>
<thead>
<tr>
<th>Task</th>
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<th>Post</th>
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</thead>
<tbody>
<tr>
<td>Identifying eligible students</td>
<td>18%</td>
<td></td>
</tr>
<tr>
<td>Providing accommodations for students</td>
<td>93%</td>
<td>97%</td>
</tr>
<tr>
<td>Creating/writing 504 Plans</td>
<td>0%</td>
<td>76%</td>
</tr>
<tr>
<td>Participating in 504 meetings</td>
<td>0%</td>
<td>55%</td>
</tr>
<tr>
<td>Conducting 504 Meetings</td>
<td>21%</td>
<td></td>
</tr>
</tbody>
</table>

Figure 4: Pre and post ratings of "Agree" or "Strongly Agree" ratings of general education teacher responsibilities.
My responsibilities regarding Section 504 are: (choose all that apply)

Special Education

- Pre
- Post

<table>
<thead>
<tr>
<th>Task</th>
<th>Pre</th>
<th>Post</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identifying eligible students</td>
<td>14%</td>
<td>25%</td>
</tr>
<tr>
<td>Providing accommodations</td>
<td>25%</td>
<td>43%</td>
</tr>
<tr>
<td>Creating/writing 504 Plans</td>
<td>0%</td>
<td>57%</td>
</tr>
<tr>
<td>Participating in 504 meetings</td>
<td>0%</td>
<td>25%</td>
</tr>
<tr>
<td>Conducting 504 Meetings</td>
<td>0%</td>
<td>25%</td>
</tr>
</tbody>
</table>

Figure 5: Pre and post ratings of “Agree” or “Strongly Agree” ratings of special education teachers’ 504 responsibilities.
Figure 6: Pre and post ratings of "Agree" or "Strongly Agree" ratings of general education teachers' knowledge of who qualifies for 504 services.
I know who qualifies for a 504 Plan.

Special Education

<table>
<thead>
<tr>
<th></th>
<th>SPED Pre</th>
<th>SPED Post</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>75%</td>
<td>43%</td>
</tr>
<tr>
<td>No</td>
<td>29%</td>
<td>25%</td>
</tr>
<tr>
<td>Maybe</td>
<td>29%</td>
<td>0%</td>
</tr>
</tbody>
</table>

Figure 7: Pre and post ratings of "Agree" or "Strongly Agree" ratings of special education teachers' knowledge of who qualifies for 504 services.
I know how to refer a child for a 504 plan.

*General Education*

- General Ed Pre
- General Ed Post

<table>
<thead>
<tr>
<th></th>
<th>General Ed Pre</th>
<th>General Ed Post</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>23%</td>
<td>66%</td>
</tr>
<tr>
<td>No</td>
<td>40%</td>
<td>3%</td>
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<tr>
<td>Maybe</td>
<td>38%</td>
<td>31%</td>
</tr>
</tbody>
</table>

Figure 8: Pre and post ratings of "Agree" or "Strongly Agree" ratings of general education teachers' familiarity with Section 504 referral procedures.
I know how to refer a child for a 504 plan.

Special Education

<table>
<thead>
<tr>
<th></th>
<th>SPED Pre</th>
<th>SPED Post</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>75%</td>
<td>29%</td>
</tr>
<tr>
<td>No</td>
<td>57%</td>
<td>25%</td>
</tr>
<tr>
<td>Maybe</td>
<td>14%</td>
<td>0%</td>
</tr>
</tbody>
</table>

Figure 9: Pre and post ratings of “Agree” or “Strongly Agree” ratings of special education teachers’ familiarity with Section 504 referral procedures.
I know who to ask to get information on a 504 Plan.

*General Education*

```
83%
25%
20%
3%
```

Yes | No | Maybe
---|----|-----
55%| 20%| 25%
83%| 14%| 3%

Figure 10: Pre and post ratings of "Agree" or "Strongly Agree" ratings of general education teachers' knowledge of who to ask for assistance with 504 Plans.
I know who to ask to get information on a 504 Plan.

Special Education

<table>
<thead>
<tr>
<th></th>
<th>SPED Pre</th>
<th>SPED Post</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>100%</td>
<td>29%</td>
</tr>
<tr>
<td>No</td>
<td>29%</td>
<td>0%</td>
</tr>
<tr>
<td>Maybe</td>
<td>43%</td>
<td>0%</td>
</tr>
</tbody>
</table>

Figure 11: Pre and post ratings of “Agree” or “Strongly Agree” ratings of general special education teachers’ knowledge of who to ask for assistance with 504 Plans.