

The logo for ECHO IDAHO is a large, stylized letter 'E' composed of three overlapping chevron shapes. The top-left chevron is yellow and contains the word 'ECHO' in white, bold, sans-serif capital letters. The middle chevron is light gray and contains the word 'IDAHO' in black, bold, sans-serif capital letters. The bottom-right chevron is yellow and contains the text 'K12 Section 504' in black, sans-serif capital letters.

ECHO IDAHO

K12 Section 504

Foundations of Eligibility: Deciding Who Needs a 504 Plan and Why

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Kelsey Williams, Ed.D., Superintendent, former Special
Education Director, COSSA School District

Ashley Walker, RN, MSN, School Nurse, Lewiston
School District

None of the planners or presenters for this educational activity have relevant financial relationship(s) to disclose with ineligible companies whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

Course Objectives

By the end of this presentation, participants will be able to:

1. Explain Section 504 by defining its purpose and summarizing its legal history.
2. Identify eligibility requirements and understand what constitutes a substantial limitation for a 504 Plan.
3. Compare and contrast 504 Plans, IEPs, and medical plans to determine when each is most appropriate.

504 Overview

- Section 504 of the Rehabilitation Act of 1973
- Free Appropriate Public Education (FAPE)
- Office for Civil Rights (OCR)
- 504 Plan

How to Qualify



Substantial Limitation

a physical or mental impairment which substantially limits one or more major life activities

Two Definitions

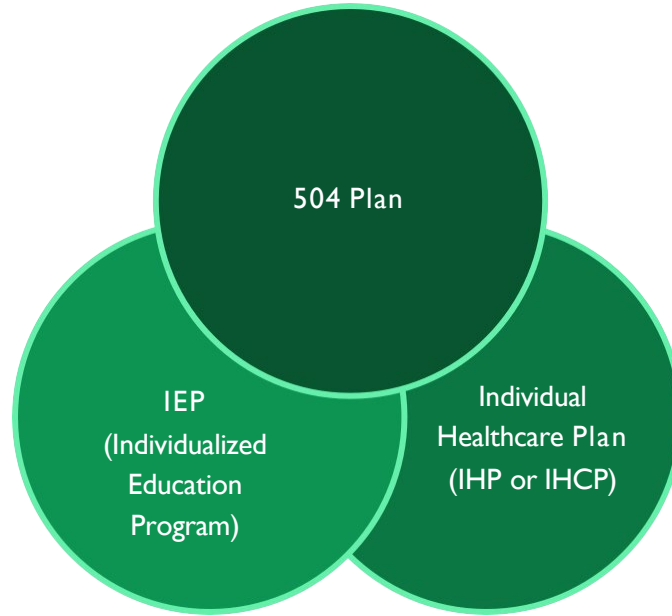
- EEOC (Equal Employment Opportunity Commission)
- ADA Amendments Act (ADAAA)

When is it necessary

- ★ Student has a disability that substantially limits a major life activity
- ★ Student needs classroom accommodations to access learning
- ★ The disability impacts educational performance or participation, even if the student earns passing grades
- ★ Supports are needed for equal access, not for specialized instruction (which would fall under an IEP)

A medical diagnosis alone is not enough — there must be evidence of impact on school access

IEP v. 504 v. Healthcare Plan



Scenario #1

Student Profile:

A 13-year-old male student, new to the school this year, is transitioning from homeschooling to a public middle school setting for the first time. He has a medical diagnosis of Hemophilia A (Factor VIII deficiency), which was identified at age 3. The student has a port-a-cath in place to receive weekly infusions at home. His parents have provided the school with appropriate medical documentation confirming the diagnosis and outlining his care needs.

Scenario #2 - Marcus 3rd Grade Student

Marcus is an energetic and creative 3rd grader who has been diagnosed with ADHD. He is not eligible for special education services under IDEA because his academic testing shows he is at grade level in reading and math.

What's happening in school:

- Marcus has difficulty sustaining attention during independent work, often leaving assignments unfinished.
- He blurts out answers and struggles to wait his turn, which impacts classroom routines.
- During lengthy assessments, he becomes restless and makes careless mistakes that don't reflect his true knowledge.
- Despite strong effort, his grades are beginning to slip because he cannot consistently demonstrate his understanding without support.

Scenario #2 - Continued

Possible accommodations in a 504 Plan:

- Preferential seating away from high-traffic distractions.
- Breaking long assignments into smaller, manageable chunks with frequent check-ins.
- Extended time or movement breaks during tests and classwork.
- Positive behavior supports and clear, consistent routines.
- Use of fidgets or other self-regulation tools as appropriate.

References

Richards, D. M. (2017). AN OVERVIEW OF SECTION 504. Austin, TX; National.

U.S. Department of Education. (2025, June 30). *Frequently asked questions: Section 504 free appropriate public education (FAPE)*. U.S. Department of Education.

<https://www.ed.gov/laws-and-policy/civil-rights-laws/disability-discrimination/frequently-asked-questions-section-504-free-appropriate-public-education-fape>

U.S. Department of Education. (2025, August 21). *Section 504*. U.S. Department of Education.

<https://www.ed.gov/laws-and-policy/individuals-disabilities/section-504>