

Analyzing 504 Data Across Three CT School Districts

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Background

"Students who do not qualify for special education under the IDEA but are determined disabled under Section 504 of the Rehabilitation Act of 1973 are eligible for accommodations that may include AT devices and/or services. Note that Section 504 uses the term “handicapped” while the IDEA uses the term “disability.” The definition of disability under Section 504 is different from the definition of disability under IDEA. Under Section 504, an “individual with handicaps” is defined as a person who “(i) **has a physical or mental impairment which substantially limits one or more major life activities**, (ii) has a record of such an impairment, or (iii) is regarded as having such an impairment.” Major life activities include walking, sleeping, seeing, hearing, **learning**, caring for oneself, performing manual tasks, speaking, breathing, and working (29 U.S.C. §706[8][B]). This means that the definition of individuals with handicaps under Section 504 is broader than the definition of children with disabilities under the IDEA."

Background

- Initially, 504 accommodations aimed to provide equal access to education for students with disabilities by removing barriers to learning
 - Over time, the focus has shifted to include more specific academic accommodations tailored to individual student's needs
- Evolved to address the unique challenges faced by students with ADHD
 - e.g. Difficulty with sustained attention, organization, time management
- Increased awareness of mental health issues led to increased need for accommodations to support students with anxiety
 - E.g. Extended time on tests, permission to take breaks, access to quiet spaces, deadline flexibility
- This evolution reflects a broader understanding of diversity in learning needs and a commitment to providing inclusive education for all students

Background

- IEP Classifications and 504 Classifications:

The 13 categories of disabilities covered under IDEA are: Autism, Specific learning disability, Speech or language impairments, Emotional disturbance, Traumatic brain injury, Visual impairment, Hearing impairment, Deafness, Mental retardation, Deaf-blindness, Multiple Disabilities, Orthopedic impairment, and Other health impairment (deBettencourt, 2002). Specific criteria exists for classification under each of the 13 categories. Eligibility for education and academic services under Section 504 of the Rehabilitation Act (1973) is generally broader and is often explained as having the existence of an identified physical or mental condition that substantially limits a major life activity (deBettencourt, 2002).

Evaluation of 504 Case Management

- The role of a school counselor in the 504 process may vary from state to state, district to district and even building to building. The school counselor's primary role is to be an advocate for students in this process.
- The school counselor's job is to start the 504-evaluation process once a referral is received. Accommodations may help this student access their education and prevent exclusion or discrimination based on an impairment.

Research Questions

- Goal: Disseminate CT's 504 data from CTSEDS
- Adjust: Limited to our internship site districts
- 3-Part Question:
 - How do ethnicity and racial backgrounds vary among students on 504 plans in CT high schools?
 - What patterns emerge in the disability classifications of students on 504 plans within CT high schools?
 - What are demographic characteristics, including age, gender, of students enrolled in 504 plans within CT high schools?

Methodology

- 504 student sample collected from 3 Connecticut High Schools
- Individual school data gathered from Ed-Sight
- Data was collected in different ways for each school
- Descriptive analytics used to examine the data district by district, then as a combination of three districts

First Finding

- Finding from the data collection process:
 - There are no specific procedures for collecting and storing 504 information in or across school districts
 - It is very specific who has access to 504 data
 - 504 data is not accessible to the public
 - Special Education data (IEPs) is reported on Ed-Sight because it's required under Special Education Law
 - But 504 is under Civil Rights Law
 - 504 data has not historically been reported or tracked

Part 1: Ethnicity & SES Level

Kimberly Richmond

Part 1: Research Question

How do ethnicity and racial backgrounds vary among students on 504 plans in CT high schools?

Methodology

- 504 student sample collected from 3 Connecticut High Schools
- Individual school data gathered from Ed-Sight
- Descriptive analytics used to examine the data district by district, then as a combination of three districts
- Data was collected in different ways for each school:
 - **East Hartford:** Secondary Supervisor of School Counseling has access to 504 data for all students (grades 6-12) but needed to pull different reports to merge the information

East Hartford School District

- Ed Sight: 15 schools/programs totaling 6,410 students
 - Student Counts by Race/Ethnicity and Year:

Race/Ethnicity	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
American Indian or Alaska Native	*	14	14	16	18	18
Asian	320	301	278	256	254	251
Black or African American	2,083	2,039	1,983	1,907	1,913	1,899
Hispanic/Latino of any race	3,303	3,362	3,294	3,194	3,305	3,403
Native Hawaiian or Other Pacific Islander	*	6	11	14	13	15
Two or More Races	288	287	257	227	222	206
White	825	784	744	712	667	618
Total	6,836	6,793	6,581	6,326	6,392	6,410

** The data are suppressed to ensure confidentiality.
As a result, the graph is not shown.*

EHHS: Results

- Received data for 198 students across grades 6 – 12
 - EHMS, Sunset, EHHS, CIBA, Synergy, Woodland
 - Ages 11 – 19; Male & Female
- Types of disabilities:
 - ADD/ADHD, Depressive Disorder, General Anxiety Disorder, Emotional, OTH, Autism, Diabetes, Hearing Impaired, Vision
 - Discovered "504G" type
- HS 504's Race: 64% White, 54% Hispanic, 24% Black or African American, 1% Asian, & .5% American Indian
 - 10% identify with two or more races

Griswold School District

- Ed Sight: 4 schools/programs totaling 1,775 students
 - Student Counts by Race/Ethnicity and Year:

Race/Ethnicity	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
American Indian or Alaska Native	18	*	*	*	*	*
Asian	32	27	28	31	28	31
Black or African American	49	46	35	42	48	43
Hispanic/Latino of any race	152	166	165	200	234	245
Native Hawaiian or Other Pacific Islander	6	*	*	*	*	*
Two or More Races	115	133	122	125	126	115
White	1,404	1,378	1,302	1,305	1,277	1,326
Total	1,776	1,772	1,671	1,719	1,725	1,775

* The data are suppressed to ensure confidentiality.

As a result, the graph is not shown.

Griswold High School: Results

- Received data for 178 students across grades PK – 12, 72 in HS
 - GES, GMS, GHS
 - Ages 6 – 18; Male & Female
- HS 504's Race: 79% White, 9% Hispanic, 11% Black or African American, & 1% American Indian
- Types of disabilities:
 - ADD/ADHD, Depressive Disorder, General Anxiety Disorder, Emotional, OTH, Mood Disorder, ODD, Autism, Diabetes, Hearing Impaired, Vision, Nephrotic Syndrome, Dysplasia, Scoliosis, Midline Thoracic Back Pain, Pierre Robin Sequence, Allergy, Blood Bone and Kidney Disease, Seizure Disorder, Digestive Function, Executive Functioning, Attachment Disorder, Breathing, Multiple Disabilities, Development Delay, Anorexia Nervosa/Bulimia Disorder, IBS, Psychogenic Seizures, PTSD, End Stage Renal Disease with Hemodialysis

Guilford School District

- Ed Sight: 8 schools/programs totaling 3,130 students
 - Student Counts by Race/Ethnicity and Year:

Race/Ethnicity	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
American Indian or Alaska Native	*	0	0	0	0	*
Asian	136	139	148	148	147	147
Black or African American	37	*	*	*	*	35
Hispanic/Latino of any race	239	247	251	268	292	298
Native Hawaiian or Other Pacific Islander	*	*	*	*	*	*
Two or More Races	132	133	145	170	179	185
White	2,761	2,700	2,519	2,507	2,495	2,460
Total	3,311	3,259	3,105	3,136	3,155	3,130

* The data are suppressed to ensure confidentiality.

As a result, the graph is not shown.

Guilford High School: Results

- Received data for 140 students across grades 9 – 12
 - Ages 14– 18; Male, Female and Non-binary
- HS 504's Race: 85% White, 11% Hispanic, .7% Black or African American, & 5% More than two races.
- Types of disabilities:
 - **ADD/ADHD**, Depressive Disorder, General Anxiety Disorder, Emotional, OTH, Autism, Diabetes, Hearing Impaired, Vision, Decoding/Encoding weakness, Adjustment, Learning Disabilities, OCD, Ehlers-Danlos syndrome, IHP, PANDAS immune disease, Misophonia, Celiac disease, Crohn's disease

Overall Findings

- East Hartford had lower variety of diagnoses v. Griswold contain a higher diversity of diagnoses
- Popular diagnoses across the Hispanic population: **ADD/ADHD**, Anxiety, Depressive Disorder
- Popular diagnoses across the Black population: **ADD/ADHD**, Anxiety, Depressive Disorder, OTH
- Popular diagnoses across the White population: **ADD/ADHD**, **Anxiety**, Depressive Disorder, Learning Disabilities
- "504G" classification impacted data collection

Part 2: Disability Classification

Laura Markle

Part 2: Research Question

What patterns emerge in the disability classifications of students on 504 plans within CT high schools?

Methodology

- 504 student sample collected from 3 Connecticut High Schools
- Individual school data gathered from EdSight
- Descriptive analytics used to examine the data district by district, then as a combination of three districts
- Data was collected in different ways for each school:
 - **Guilford:** Director of School Counseling keeps 504 data for all students (grades 9-12) on a spreadsheet based on CTSeds data and 504 meetings

Special Education Student Enrollments

Public School Enrollment Trend

Student Counts by Special Education Status and Year

Guilford School District, Guilford High School

[Export .csv file](#)

Special Education Status	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
No	970	989	986	954	916	891
Yes	125	125	118	140	132	135
Total	1,095	1,114	1,104	1,094	1,048	1,026

Public School Enrollment Trend

Student Counts by Special Education Status and Year

East Hartford School District, East Hartford High School

[Export .csv file](#)

Special Education Status	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
No	1,466	1,388	1,348	1,285	1,334	1,369
Yes	311	294	327	347	364	354
Total	1,777	1,682	1,675	1,632	1,698	1,723

Public School Enrollment Trend

Student Counts by Special Education Status and Year

Griswold School District, Griswold High School

[Export .csv file](#)

Special Education Status	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
No	424	420	398	406	420	450
Yes	96	101	105	102	113	128
Total	520	521	503	508	533	578

Number of 504 Students Per District

- Guilford: 140
- Griswold: 72
- East Hartford: 136

Results

- 504 data from 3 CT high schools
 - 2.3% ASD
 - 39% ADHD diagnosis
 - 29% Anxiety diagnosis
 - 2.5% Learning Disability
 - 7.8% Health
 - 2% Hearing Impairment
 - 0.86% Vision Impairment
 - 15% 504G
 - 1.8% Other

Findings

- An ASD diagnosis does not commonly fall under 504
 - Guilford is the only school out of the 3 CT schools that does not have any students with ASD on a 504 plan
- Does ADHD belong under 504?
 - ADHD + LD typically falls under IEP
 - If an individual's ADHD is severe, would their needs be better met through an IEP
- ADHD diagnosis has the highest prevalence in 504 Disabilities, followed closely by Anxiety diagnosis
 - Significant proportion of students receiving 504 accommodations have neurodevelopmental or mental health conditions
 - 504 accommodations are not limited to a specific type of disability, but are provided based on individual needs across a range of conditions

Part 3: Age, Gender, & Grade Level

Caitlin Pichette

Part 3: Research Question

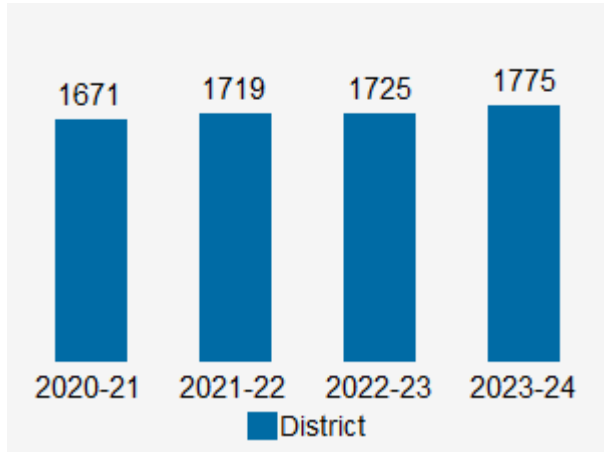
What are demographic characteristics, including age, gender, of students enrolled in 504 plans within CT high schools?

Methodology

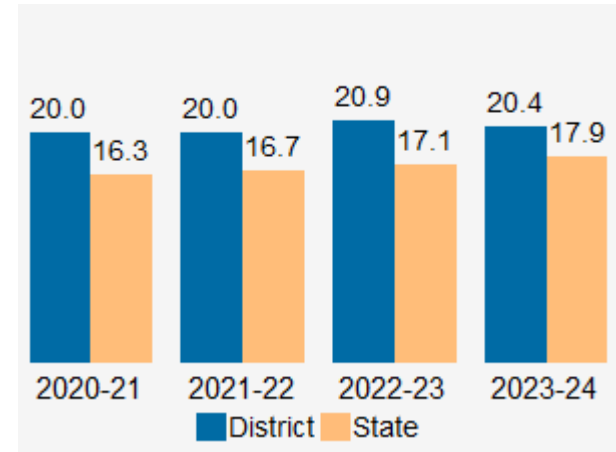
- 504 student sample collected from 3 Connecticut High Schools
- 171 student sample collected from 2 Connecticut Elementary and Middle Schools
- Individual school data gathered from Ed-Sight
- Descriptive analytics used to examine the data district by district, then as a combination of three districts
- Data was collected in different ways for each school:
 - **Griswold:** Director of School Counseling keeps 504 data for all students (grades 9-12) on a spreadsheet based on CTSeds Data

Griswold School District

Total District Enrollment 2023-2024



Percentage of Students with a Disability



Gender	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Female	872	886	827	842	*	*
Male	904	886	844	877	871	912
Total	1,776	1,772	1,671	1,719	1,725	1,775

Age:

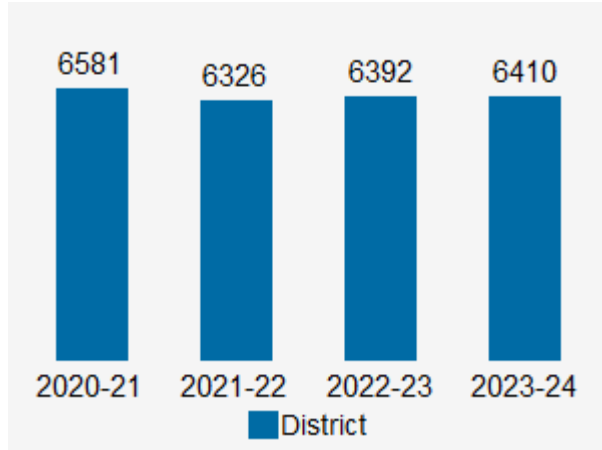
Grade	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Pre-Kindergarten	87	71	49	73	66	64
Kindergarten	136	124	105	126	115	106
Grade 1	116	137	113	106	131	118
Grade 2	109	114	132	130	119	133
Grade 3	119	108	113	134	126	122
Grade 4	129	116	107	127	136	124
Grade 5	152	133	114	111	122	143
Grade 6	127	148	125	117	115	133
Grade 7	140	140	144	126	118	112
Grade 8	117	139	143	138	120	121
Grade 9	150	145	135	159	158	187
Grade 10	128	133	127	112	155	141
Grade 11	130	132	131	119	110	145
Grade 12	136	132	133	141	134	126
Total	1,776	1,772	1,671	1,719	1,725	1,775

Griswold School District

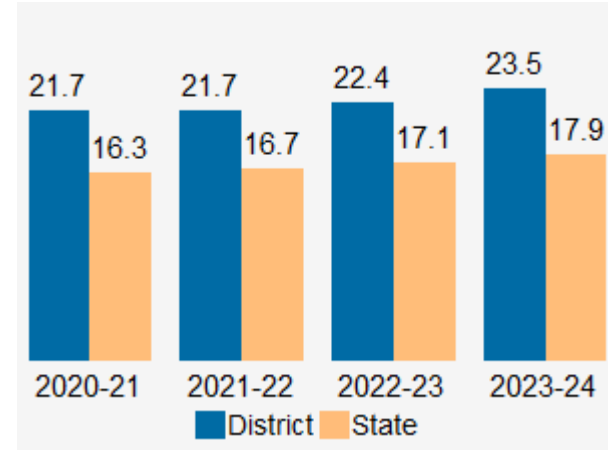
- Total Students under Section 504
 - 178 Students
 - 76 Female Students
 - 102 Male Students
- Total District Enrollment
 - 1,775

East Hartford Public Schools

Total District Enrollment 2023-2024



Percentage of Students with a Disability



Gender	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Female	3,224	3,210	3,125	3,017	3,070	3,069
Male	3,612	3,583	3,456	3,309	3,322	3,341
Total	6,836	6,793	6,581	6,326	6,392	6,410

East Hartford Public Schools

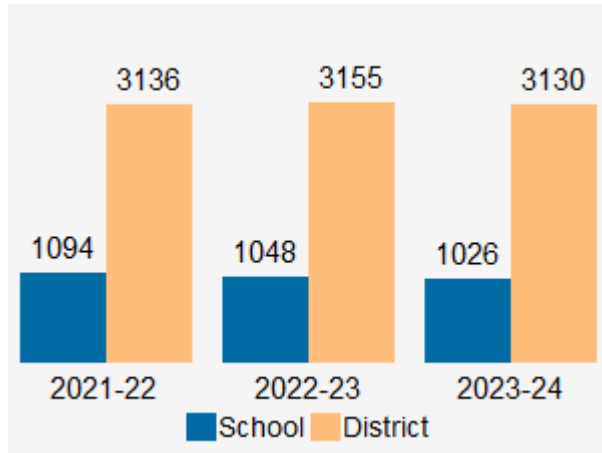
Grade	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Pre-Kindergarten	318	323	261	285	320	315
Kindergarten	454	478	429	481	438	441
Grade 1	508	456	457	475	484	452
Grade 2	466	496	468	426	468	466
Grade 3	437	473	482	442	433	457
Grade 4	502	449	460	464	459	432
Grade 5	555	504	458	446	466	441
Grade 6	495	517	429	389	426	444
Grade 7	470	518	535	421	407	426
Grade 8	450	496	530	525	433	415
Grade 9	502	446	462	526	530	468
Grade 10	562	507	451	454	566	540
Grade 11	517	562	513	432	473	564
Grade 12	600	568	646	560	489	549
Total	6,836	6,793	6,581	6,326	6,392	6,410

East Hartford Public Schools

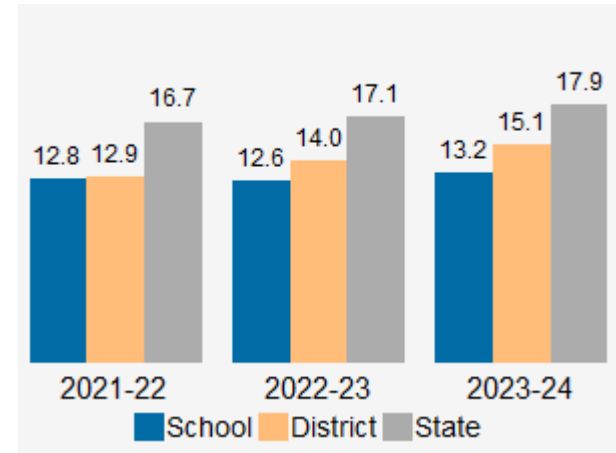
- Total Students under Section 504
 - 199 Students
 - 100 Female Students
 - 99 Male Students
 - Total District Enrollment
 - 6,410 Students

Guilford High School

Total District Enrollment 2023-2024



Percentage of Students with a Disability



Gender	Year					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Female	553	566	*	*	496	*
Male	542	548	569	563	542	530
Total	1,095	1,114	1,104	1,094	1,048	1,026

Guilford High School

Age

Grade	Year					2023-24
	2018-19	2019-20	2020-21	2021-22	2022-23	
Grade 8	0	*	0	0	0	0
Grade 9	279	297	268	264	230	264
Grade 10	265	270	303	267	264	226
Grade 11	287	*	263	297	264	268
Grade 12	264	284	270	266	290	268
Total	1,095	1,114	1,104	1,094	1,048	1,026

Guilford High School

- Total Students under Section 504
 - 139 Students
 - 67 Female Students
 - 72 Male Students
- Total School Enrollment
 - 1,026

Results

- A higher number of male students have 504 plans except for East Hartford Public Schools.
- Majority of students plans created after the pandemic.
- 121 students between the ages of 16-18 continuing plans transitioning out of high school.
- 34 eleven year old students continuing plans to middle school.

Implications

- Implications for Special Education / Neurodiverse community
 - Are student's needs being met under this law?
- Implications for schools / school counselors
 - Need for standardization and clarity in how schools handle this data
 - Without clear guidelines, there may be inconsistencies, potentially leading to inequities in access to services for eligible students
- Implications for students
 - Students who qualify for accommodations may not be receiving the support they need, or their needs may not be recognized or addressed

Strengths

- This is the first time this data has been analyzed from these school districts
- The data collected from the 3 schools is up-to-date (2023-2024 school year)
- The school data used comes from schools in three different counties of Connecticut, leading to a more generalizable sample
- Analyzed data from 348 students on 504 plans in CT

Limitations

- Schools do not track/store 504 data in the same way, making it difficult to compare across districts
- Only had access to data from 3 out of 169 districts in CT
 - 504 data is not on Ed-Sight
- There is a lack of tracking and documentation surrounding 504 cases
- No data was collected from other states
 - We do not know how other states track this data

Overall Findings

- Data is not accessible via public records or access
- 504 data was recently moved to CTSeds
 - It is unknown how much data was lost or incorrectly transferred over in the process (e.g. 504G)
- Districts have not looked at this data set
 - This data had not been downloaded or examined prior to this study

Next Steps for LEND Trainees

- Be aware of 504 processes in the schools you work in
- Actively evaluate whether your student's needs are being met in your school based on their 504 plan
- Collaborate with all stakeholders, the student, and the family when implementing a 504 plan
- Ensure all appropriate documentation is updated in CTSeds
- Always check for updated findings and Section 504 requirements

References

deBetterncourt, L.U. (2002). Understanding the differences between IDEA and section 504. *Teaching Exceptional Children*, 34(3), 16-23.

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