

Interview Study with School Counselors about 504 Case Management

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Background

- 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.”
- 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).

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

Background

- 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



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

- How do these schools assess and factor in the level of impairment to determine eligibility?
- How does the initial eligibility process for a 504 plan compare between two large public high schools in CT?

Methodology

- Semi-Structured Interview (questions to follow)
- Participants were invited by email to participate. The interviews were not recorded, Dr. Renzulli attended and took notes. Verbal consent was obtained at the start of the interview. At the conclusion of the interview the notes were emailed back to the school counselors to verify for accuracy.
- To analyze the interview data, Emily, Jameson and Dr. Renzulli met to look for themes and patterns in the data.

Interview Questions

- Part I: Background on the school counselor:
- How long have you been involved in 504 case management at school?
- When you started as a 504-case manager did you feel prepared for this task?
 - How were you trained in the legal and school procedures around section 504?
- Since you have been a 504-case manager have you received any professional development on initial eligibility or best practices for 504?

Interview Questions

- Part II: 504 Process:
- What factors do school staff consider when determining if a 504 plan is the appropriate action for the student?
- As you are aware, section 504 is focused heavily on the level of impairment which a disability impacts an individual's ability to access in this case school and academics. How is the level of impairment considered when thinking about initial eligibility?
- How does the support services team determine if a diagnosis or documentation presented qualifies as 'severe' impairment, and thus, that student should be placed on a 504?
- As a 504-case manager do you feel like you have the ability to deny a 504 plan?

Interview Questions

- Part III: Opinions & Practices:
- What do you feel about the 504 initial eligibility process at your school currently works well?
- What are your thoughts and ideas on how to change the eligibility process?
- Do you feel that the challenge of initial eligibility is beyond individual districts, requires support or guidance from the state?

Farmington High School and Newtown High School Comparison Analysis

Methodology at FHS

- Who was interviewed: School Counselor
- Date of interview: 3/10/25
- Modality- Hybrid
- People present- School Counselor, Jameson Corey, Dr. Renzulli
- Analysis: inductive thematic analysis.

Methodology at NHS

- Who was interviewed: School Counselor
- Date of interview: 3/10/25
- Modality: Hybrid
- People present: School counselor, Dr. Renzulli, and I
- Analysis: inductive thematic analysis.

Comparison, Part I: Background of School Counselor

Question	Farmington (themes)	Newtown (themes)
Years of experience	19	12
Years as 504 case manager	19	12
Professional development on 504	Some in the past, hasn't happened in year, attorney was brought in	1 PD in 12 years, pupil service director brought in lawyer about 6-7 years ago
Graduate school training	Had training around what section 504 was and ADA, no schooling around case management.	Not addressed in responses.

Comparison, Part 2: 504 Process

Question	Farmington (themes)	Newtown (themes)
Pre-Meeting Contact	Not among staff Supervisor though it might be helpful Parents provide relevant documentation	Diagnosis is sent to school as referral. Pre-meeting with 504 team Contact with family if needed about 504 process.
Teacher Feedback Process	Questionnaire sent out to all teachers that asks teachers to write in about strengths, weaknesses, and provide feedback on if the teachers feel accommodations would help student access curriculum.	Teacher reports using a google form that ask about students' current grade in class, what accommodations are used, challenges the student is having, and concerns the teachers may have.
Administrative Support / Oversight	None unless requested by school counselor, department head	Assistant Principal present for every 504
Level of Impairment	Does not recall it being discussed	Not considered, too subjective
Ability to Deny a 504 plan	Does not feel like they have the ability to deny	Does not feel they have ability to deny

Comparison, Part 3: Opinions and Practices

Question	Farmington (themes)	Newtown (themes)
What currently works well (initial eligibility)	Consistency among counselors in terms of what is being asked for.	Pre-meeting, 504 team
Suggested Changes to initial eligibility.	More information	More training, threshold to measure level of impairment
Is this problem broader than individual districts?	Yes, but unsure if a state mandate would be helpful	No, should be handled at individual district level

Overall Findings RQ1

RQ 1: How do these schools assess and factor in the level of impairment to determine eligibility?

- Level of impairment is not considered in initial eligibility
- Counselors lack education, training, and professional development to adequately understand how to assess level of impairment
- External / Outside Diagnosis (such as anxiety) is usually automatically put on a 504 plan without consideration of level of impairment

Overall Findings, RQ2

- How does the initial eligibility process for a 504 plan compare between two large public high schools in CT?
- (1) SC in both districts lacked graduate training, and professional development to be effective in implementing an initial eligibility process.
- (2) SC inability to deny 504s and engage in that conversation across both schools is significant and needs to be explored further.

Strengths of this Study

- This is the first time an interview study has taken place about 504 initial eligibility content with school counselors in CT.
- 504 plans are a big topic in the school counseling community, in the state of CT, and nationally.
- In many studies on section 504, a special education administrator is interviewed, yet that individual typically has little to no involvement with 504.
- Both schools are similar in size, demographics and number of counselors.
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Limitations of the Study

- Only two schools / school counselors were interviewed, thus this content is not generalizable.
- Both schools are similar in size, demographics and number of counselors.

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.
[http:// doi.org/10.1177/004005990203400302](http://doi.org/10.1177/004005990203400302)