

THE RELATIONSHIP BETWEEN PROFESSIONAL DEVELOPMENT AND JOB
EFFICACY OF MISSOURI SECTION 504 COORDINATORS

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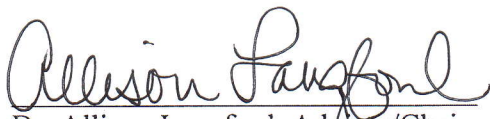
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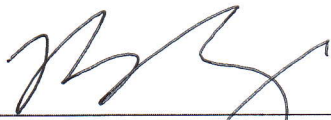
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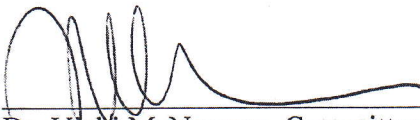
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LIST OF ABBREVIATIONS

ADA - Americans with Disabilities Act

ADD - Attention Deficit Disorder

ADHD - Attention Deficit Hyperactivity Disorder

ADAAA - Americans with Disabilities Act Amendment Act

AMSC - American School Counselor Association

CEC - Council for Exceptional Children

EAHCA - Education of All Handicapped Children Act

FAPE - Free Appropriate Public Education

IDEA - Individuals with Disabilities Act

IDEIA - Individuals with Disabilities Improvement Act

IEP - Individual Education Plan

LRE - Least Restrictive Environment

MSCA - Missouri School Counselor Association

OCR - Office of Civil Rights

OSEP - Office of Special Education Programs

PARC - Pennsylvania Association of Retarded Citizens

T1D - Type 1 Diabetes

ABSTRACT

This study examines the professional development and job efficacy of Section 504 coordinators in Missouri. Section 504 of the Rehabilitation Act of 1973 requires that public schools make reasonable accommodations for students with disabilities in order to prevent intentional or unintentional discrimination. School districts that receive federal funding must appoint a Section 504 coordinator for their district. This study examines if the amount of professional development hours of Section 504 coordinators relates to job efficacy through the framework of social equity theory. Section 504 coordinators from Missouri were asked about their professional development experience regarding implementation of Section 504 procedures in Missouri's public schools. The 104 participants answered questions about specific 504 processes as identified in the Review of Literature. A Pearson correlation was conducted, thus generating a correlation coefficient. This was the basis for concluding that no statistically significant relationship was found between Section 504 efficacy and the hours of professional development coordinators received. This study also examined Section 504 coordinator demographics in Missouri. A review of the demographics revealed that over 50% of the coordinators that completed the survey did not have any training in Section 504 policies or procedures before assuming the role of Section 504 coordinator. These findings correlate to similar studies as identified in reviewing the literature. The availability of the data in this study will provide additional research that can be used to improve training for future Section 504 coordinators.

CHAPTER ONE

INTRODUCTION

Section 504 of the Rehabilitation Act (Section 504), the Individuals with Disabilities Education Act (IDEA), and the Americans with Disabilities Act (ADA) have significantly impacted the education of disabled students in the twentieth century. Section 504 is a section of Public Law 93-112 of the Rehabilitation Act of 1973. Originally developed to assist veteran soldiers returning from war, Section 504 also ensures nondiscrimination of individuals with disabilities in all public schools who receive federal funding. Section 504 states, “No otherwise qualified handicapped individual shall, solely by reason of his/her handicap, be excluded from the participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance” (Section 504 of the Rehabilitation Act of 1973).

This law prohibits discrimination against students who meet the specific definition of disability as described by law. Any schools receiving federal funding of any kind are included in this mandate. Because this encompasses all educational institutions, educational administrators are tasked with the chore of assigning a coordinator to ensure compliance within each institution (Shaw & Madaus, 2008). These coordinators often referred to as Section 504 coordinators or simply 504 coordinators are responsible for developing, implementing, and tracking all aspects of Section 504 of the Rehabilitation Act. However, unlike the ADA which supports special education services, Section 504 is an unfunded mandate. This means district administrators must ensure compliance with this mandate without any funding from the federal government.

According to Yell, Rogers, and Rogers (1998), a Section 504 coordinator must provide training for school district employees with regard to understanding and complying with Section 504

regulations. All school districts that have 15 or more employees must monitor the Section 504 process through a system-wide coordinator (Section 504 of the Rehabilitation Act of 1973).

Overview

Because it receives no federal funding, has few regulations, and minimal litigation, Section 504 of the Rehabilitation Act of 1973 sometimes is not properly implemented or may be even overlooked in the public schools. That reality is unfortunate as Section 504 programs can do a great deal to remove the pressure to place students in special education who clearly are not eligible. Section 504 can also provide a support net for some students dismissed from special education and for some who are not disabled enough to qualify for special education (Richards, 2010).

In 2002, Tom E. Smith, a Section 504 expert, indicated that school personnel often do not know which students should be referred under Section 504 or IDEA. In addition, many educators are often unfamiliar with the referral process or when to refer a child to either a special education program or to consider a 504 plan. Both IDEA teams and Section 504 teams look to district administration to lead them through the referral process. Smith also noted that during the Section 504 referral process, eligibility may be subjective. Therefore, the Section 504 coordinator is often called upon to make legal decisions regarding the identification and services for students who are eligible for Section 504. Due to this responsibility, it is imperative that the 504 coordinator know and understand the legal context of Section 504 in order to properly implement the mandate in public schools. Although Section 504 is not a special education law, the referral process largely mirrors that of the IDEA process. Due to legal similarities, the responsibility for the implementation of the law most often falls with special educators as they would have the most comprehensive knowledge of the law (Seese, Maduas, Bray, & Kehl, 2003). However, due

to limited Section 504 professional development, many 504 coordinators are unable to correctly execute the responsibility associated with this mandate.

Theoretical Framework of the Study

The theoretical framework for this study is based on the fundamental belief that all people deserve the right to an appropriate education. Education in the United States is based upon a democratic notion that all people, regardless of nationality, religion, or creed, are created equal and should be treated equally. The United States Constitution was built on this fundamental idea. This democratic notion is important because the United States is a melting pot of citizens from every nation in the world. One of the major goals of the American public education system is to foster the intellectual, social, and personal development of virtually all students to their highest potential (Bennett, 1999). The goal of public special education programs in the United States is to secure and provide equitable resources so that all students can benefit, regardless of disability. The framework of social equity in education provides the foundation for this study. This same ideology was found in sweeping educational reform of PL 94-142 and the Individuals with Disabilities Education Act.

In *A Theory of Justice* (1971), John Rawls supported the idea of citizens living in a democracy. In his theory on social equity, Rawls argued that in a democratic nation, all citizens should have basic rights as well as equal opportunities. A properly structured society and government will provide equal opportunities for all citizens (i.e., freedom of speech, freedom of religion). His theory suggested that any redistribution of resources within a nation should not occur unless it benefits the least of the poorest citizens. Even though inequalities exist in all societies, theorist believed inequalities are acceptable if they actually help out the least fortunate persons in society.

Utilizing this theory, opportunities for a commodity like education should be distributed so the least fortunate in society will be afforded the least unfortunate situation. Like Rawls, Jedicke (1997) argued that a social service like education should be geared toward the least fortunate because anyone could end up in an intolerable position themselves. Therefore, a just society ensures that all citizens receive a decent education, despite their position in life. Jedicke's society is ultimately a fair society in which education is necessary so that individuals can successfully plan and achieve satisfactory lives (Jedicke, 1997).

Educational opportunities must be provided in a way that all citizens can embrace, regardless of their different cultural, political, or socioeconomic perspectives. Therefore, American educational practices must be multicultural, because the cultures and circumstances of all students must be understood and addressed in order for individual students to be treated equally and be educationally successful (Arnold & Dodge, 1994). This multicultural educational framework also includes the culture of the disabled.

Multicultural educators must address individual and curricular needs in order to combat all forms of prejudice and discrimination toward the disabled. Educators must truly understand the difficulties associated with specific disabilities, making every effort to accommodate the disabled so they can receive equal educational opportunities compared to their nondisabled peers. Multicultural educators are also obligated to understand and combat social policies and practices that impede education of the disabled. The biggest benefit will come when disabled students feel they belong in the non-handicapped educational setting (Arnold & Dodge, 1994).

Embracing multiculturalism results in equal opportunities and treatment for all citizens. The economic, political, social, and educational opportunities for Americans should be based on social equity as a social practice rather than a set of seemingly innocent and benevolent

procedures (Harris, 1999). Social equity should not be arbitrarily administered, but be the foundation for all American ideals. Thus, the theoretical framework of this study is the ideal of equity and its application to disabled students in the American educational system.

Statement of the Problem

Because Section 504 is a mandated law, public schools must appoint an employee to coordinate and oversee the implementation of Section 504 within their districts. District administration must determine who must coordinate Section 504 and establish a process to determine which students are eligible under Section 504. It is important to note that administrators are faced with implementing numerous mandates every day. It is possible that some administrators view Section 504 as another chore (Praisner, 2003). Responsibility for managing Section 504 plans falls to a wide range of school professionals. Many school leaders only have basic knowledge of education law, and given the intentional lack of guidance from the office of Civil Rights (OCR), this leaves some districts out of compliance with Section 504 policies.

In 2009(a), Dr. Perry Zirkel, reported that although most school district personnel involved in educating children with disabilities are very familiar with the IDEA, they are not as knowledgeable about the differences in requirements of Section 504. This is understandable as there is limited research on how districts should implement this mandate (Katsiyannis & Conderman, 1994). In a 2012 study by Cornwell-Garza, parents of students with Type 1 Diabetes (T1D) gave suggestions and identified areas of concern for improved care for their children during the school day. Among the suggestions and concerns were the school district's ability to educate staff and train staff on implementing Section 504 policies and procedures. Although this study focused on the parents' interpretation of staff needs, there is little research addressing

district leadership professional development when coordinating Section 504 compliance efforts. In addition, Breault-Cannon (2014) stated, overall, Section 504 researchers have yet to conduct a study to find out how 504 coordinators are receiving training in order to create uniformity across their districts. Due to limited Section 504 professional development, many 504 coordinators are unable to correctly execute the responsibilities associated with this mandate.

Purpose of the Study

The primary purpose of this study was to examine the relationship between Section 504 professional development and the efficacy of Section 504 coordinators in carrying out the responsibilities associated within the position. The second purpose of this study was to determine whether demographic variables such as age, gender, and teacher experience showed any significant correlations in Section 504 efficacy and professional development. By quantifying the amount of job efficacy perceived by Section 504 coordinators in conjunction with the amount of Section 504 professional development received, future professional development can be designed for Missouri Section 504 coordinators to ensure that the all children in Missouri receive a free and appropriate public education.

Research Questions

This study was guided with the following questions:

1. What are the common demographics of 504 coordinators in Missouri?
2. Is there a statistically significant relationship between hours of professional development and Section 504 coordinator efficacy?

Null Hypothesis

H₀: There is no statistically significant relationship between hours of training and Section 504 coordinator efficacy score.

Significance of the Study

Due to Section 504 being a mandated federal law, every school in Missouri must have a coordinator at the district level overseeing Section 504 practices. The American public school system strives to provide an opportunity for an appropriate education for all students. However, many schools appear to lack a clear understanding of the Section 504 mandate or the implementation process (Shaw & Madaus, 2008). This lack of understanding often leads to many students being unidentified for Section 504 services and protections.

Definition of Terms

The following terms are defined in order to increase understanding of this study.

Accommodations (for students with disabilities). A change in the format or educational environment. An accommodation does not change the learning standard; the disabled student is responsible for learning the same material as nondisabled peers (Sepiol, 2015).

Disability (per Section 504). Section 504 defines a person with a disability as an individual who has a physical or mental impairment that substantially limits one or more major life functions, has a record of such impairment, or is regarded as having such an impairment (Section 504 of the Rehabilitation Act of 1973).

Free Appropriate Public Education (FAPE). A free and appropriate public education designed to be given in the least restrictive environment, especially the environment that affords the disabled student the maximum exposure to non-disabled peers (Sepiol, 2015).

Individualized Education Program (IEP). A written statement for a child with a disability that is developed, reviewed, and revised (Individuals with Disabilities Education Act , 20 U.S.C. § 1400-1419, 1990).

Individuals with Disabilities Education Act (IDEA). A law that guarantees all children with disabilities have available to them a free, appropriate, public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living (Individuals with Disabilities Education Act, 20 U.S.C. § 1400-1419, 1990).

Modifications. A change in curricular content that changes the expectation for learning and skill level is different for a disabled student when implemented (Sepiol, 2015).

Office of Civil Rights (OCR). The enforcement office of Section 504 whose enforcement scope extends to any program or activity that receives federal financial assistance from the U.S. Department of Education (Sepiol, 2015).

Section 504 of the Rehabilitation Act of 1973. A federal law that prohibits discrimination against persons with disabilities in any program or activity receiving federal financial assistance from the United States Department of Education. School districts are required to meet all specified areas of this mandate to be considered in compliance (Goldman, 2012).

In addition to understanding the key terms, it is also essential to define limitations and delimitations of the study.

Limitations, Delimitations and Assumptions of Study

Limitations occur in all types of research and may threaten the study's internal or external validity. Limitations in this study included the following:

1. Participant drop out due to time constraints, funding, or low interest level may limit the study's validity.
2. Participant and researcher bias.

3. Accessing the correct population for this study is key to ensure the proper population is being studied.
4. The sample size may not represent the desired population.
5. The responses to the study survey may be inaccurate or incomplete.
6. The limits of self-reporting may have an overall effect on the outcome of the study.
7. The participants of the study may interpret the survey questions differently than what is intended from the researcher.
8. The absence of reliability and validity data is possible for some survey measures.
9. Limitations in the research design (experimental vs. non-experimental) may lower external validity (i.e., while an experimental study allows researchers to draw causal conclusions, it may require a level of experimental control that looks very different once generalized in practice).
10. Participant bias may occur depending on how participants view their appointment to the position of Section 504 coordinator (appointed to the position rather than requesting the position).

These limitations might have restricted the participants from accurately answering the questions as proposed.

This study was based on the following assumptions:

1. Public schools in all states are required to implement Section 504 and have formulated policies and procedures to follow federal mandates.
2. All public schools have appointed a Section 504 coordinator at the district and/or building level.

3. There is currently no state funding or data reporting source for Section 504 in the state of Missouri.
4. Within the study, it was assumed that district 504 coordinators would forward the survey to building 504 coordinators when possible.
5. All public schools in Missouri had available access to the internet.
6. Section 504 is a very broad law, open to different interpretations across the state.

Delimitations are also factors that can restrict the questions researchers can answer from their findings. However, they are based on intentional choices when designing the parameters of the study. In other words, they define the project's scope.

The delimitations of this study included:

1. This study only focused on the responses of Section 504 coordinators in the state of Missouri.
2. This study only focused on the responses of Section 504 coordinators in K-12 public school districts.
3. The study did not represent other 504 team members such as nurses, regular educators, special educators, or administrators.
4. Research questions of the study focused on the professional development process and efficacy of Section 504 coordinator and not the district's process or implementation of the Section 504 process itself.
5. The limitations of the theoretical framework of Rawl's 1971 *A Theory of Justice* (i.e., social equity) adds to the delimitations of the study.

Summary

Section 504 of the Rehabilitation Act of 1973 is an important mandate for public schools receiving federal funding. School administrators are faced with the task of implementing an unfunded mandate, determining who must implement the plan, and establishing a process to determine which students are eligible under Section 504. This study included a correlational research design to determine whether and to what degree a relationship existed between hours of professional development and job efficacy. This approach examined factors associated with Section 504 coordinators' perceptions of knowledge and ability level to carry out the key tasks associated with Section 504 coordinator responsibilities.

In an effort to provide an adequate explanation of the 504 coordinator position and process, a literature review is included in Chapter Two to provide a basic understanding of the mandate and its implication on the Section 504 process. It is important to be mindful that there is only a sparse collection of research on Section 504 coordinators.

Chapter Three focuses on the research design and methodology used to acquire empirical evidence for the purposes of answering the research questions. The results of this quantitative research are reported in Chapter Four and then interpreted in Chapter Five.

CHAPTER TWO

REVIEW OF LITERATURE

Introduction

Students with disabilities have a civil right to receive necessary individualized special education and/or related aids and services, and such services are invaluable to their educational development (Lhamon, 2016). Section 504 has become pivotal in providing classroom support to students who are not otherwise eligible for special education services under the Individuals with Disabilities Education Act (IDEA) (Romano, 2006). The purpose of this chapter is to examine the research and literature related to the history and procedures in providing Section 504 services to students with disabilities, with emphasis on the role of the Section 504 coordinator. This chapter is organized into three parts that build a conceptual framework for examining the history, laws, and implementation of Section 504 policies and procedures within the public school setting.

In Chapter One, the theoretical framework of social equity was identified as the lens through which this research will be viewed. When applied to education, this theory requires educators to evaluate the delivery of educational services so that equal educational opportunities are provided to all students. This is the fundamental framework for all Section 504 evaluations and identification processes. This type of evaluation forces educators to admit that “children with and without disabilities experience very different educational experiences as a result of their financial status, ethnic heritage, native language, and neighborhood location” (Ormsbee, 2001, p. 314). As a result, it is reasonable to conclude that unequal educational opportunities have serious negative implications for children’s futures.

Social equity theory also suggests that educators eliminate inequities in the delivery of educational services (i.e., Section 504 accommodations and protections) and recognize their own prejudices for others who are different from themselves. Section 504 teams must reframe their ideals of serving all students so that education can provide “academic excellence, developmental responsiveness, and social equity” (Lewis & Norton, 2000). Social equity theory serves as the foundation for all special education programs in American public schools. From this framework flow many implications, including how equity can be achieved in education and who should be responsible for identifying the resources that individual students may need in order to receive a free, appropriate, public education.

The first sections of this chapter define the history and legal victories associated with laws for individuals with disabilities. The Americans with Disabilities Act (ADA), Individuals with Disabilities Act (IDEA), the Americans with Disability Act Amendment Act (ADAAA), and Section 504 of The Rehabilitation Act are all mandated laws intended to assist disabled Americans in their pursuit of social equity and access to basic rights. The section will also provide a brief history of how Section 504 morphed from a veteran of war program to an educational service provided to students with disabilities.

The second section introduces readers to the specific provisions of Section 504. This section describes the unique processes by which eligibility determinations are made. Additional information on how teams perform reviews of existing data will be discussed. In conclusion, specific provisions of the Section 504 accommodation plan development will be explored.

The third section of this chapter discusses the roles and responsibilities of school district employees who are designated as Section 504 coordinators in public school systems. This section will identify the responsibilities of various Section 504 team members (i.e., nurses, regular

educators, special educators, guidance counselors, and administrators). These team members and the important roles they play in the development and implementation of Section 504 plans for students with disabilities will be discussed.

The final section of this chapter outlines the importance of professional development training for both Section 504 coordinators and Section 504 team members. The level of training that regular education staff, principals, and Section 504 coordinators require in order to adequately provide Section 504 services will be explored. The chapter will conclude with examining current needs for Section 504 professional development policies and practices and the need for further research.

History of Law for Individuals with Disabilities

Section 504 is a federal law that prohibits discrimination by recipients of federal financial assistance. All public schools and school districts, as well as all public charter schools and magnet schools, that receive federal financial assistance from the department must comply with the law of Section 504 of the Rehabilitation Act of 1973 (Section 504 of the Rehabilitation Act, (1973) 29 U.S.C. 104).

Before this law was mandated, 1.75 million children with disabilities were completely excluded from public schools. Of the three million children with disabilities who went to school, many did not receive an education that was appropriate to their needs. Most often they were taught in special classes or state-supported schools (Office of Special Education Programs Special Project on Interagency Information Dissemination, 1992).

In 1975, less than half of all children with disabilities received an appropriate education. Many states had statutory regulations that enabled them to specifically exclude students with disabilities. Frustrated families, seeking the best for their children, often sought an appropriate

education and related services elsewhere. Hence, education for students with disabilities was seen as a privilege, rather than a right (Huefner, 2000).

In 2009, Zirkel suggests the overall history of Section 504 can be divided into three eras. These eras serve as a three part analysis of legislation and policy changes in regard to educating students with disabilities in public schools. Table 1 summarizes the events of disability legislation.

Table 1

The Eras of Section 504

First Era: Awareness 1970 - 1989	Second Era: Constriction 1990 - 2007	Third Era: Expansion 2008 - Present
1971 - (PARC) vs. Commonwealth of Pennsylvania	1990 - Americans with Disabilities Act (ADA)	2008 - Americans with Disabilities Act Amendment Act
1971 - Mills vs. Board of Washington DC	1990 - Education of All Handicapped Children Act Amended to Individuals with Disabilities Education Act	
1972 - Title IX of the Education Amendments	1997 - Reauthorization of IDEA	
1973 - Rehabilitation Act of 1973	1999 - Sutton v. United Airlines	
1975 - P.L. 94-142 Education for All Handicapped Children Act (EAHCA)	2002 - Toyota Motor Manufacturing v. Williams	
	2004 - Reauthorization of IDEA - Individuals with Disabilities Education Improvement Act (IDEIA)	

The First Era: Disability Awareness. This first phase of specialized education application to K-12 students spanned the late 1970s through the 1990s. This period was largely

characterized by raising awareness for educating students with disabilities in the least restrictive environment (LRE). Through this era, court cases began to emerge challenging schools and their policies when educating students with disabilities. Schools slowly began to realize they needed to adjust their policies and procedures to conform to this new era (Zirkel, 2009c). In regard to Section 504 during this first era, many school districts were missing a Section 504 coordinator, a disability-based grievance procedure, and an institutional self-evaluation. Furthermore, Katsiyannis and Conderman's 1994 survey revealed that only fourteen states had developed policies for Section 504. The 1990 passage of the ADA, which included the same definition of disability as Section 504, codified much of the Section 504 litigation to date and extended its disability discrimination prohibition to organizations that did not receive federal financial assistance (Zirkel, 2009c). Throughout this era of awareness, many court cases began to emerge that set the stage for further litigation for the rights of students with disabilities. The first landmark court case of this era was the *Pennsylvania Association for Retarded Citizens (PARC) v. Pennsylvania* (1972). This case was the first right-to-education suit in the country, that secured a quality education for all children (Smith, 2001).

PARC v. Pennsylvania of 1971. In January 1971, the Pennsylvania Association for Retarded Children brought a class action suit against the Commonwealth of Pennsylvania in Federal District Court (*PARC v. Pennsylvania*, 1972). Specifically, the suit named as defendants the state's secretaries of education and public welfare, board of education, and 13 school districts. The plaintiffs argued that students with mental retardation were not receiving publicly supported education because the state was delaying or ignoring its constitutional obligations. This violated state statutes and the students' rights under the Equal Protection of the Laws clause of the Fourteenth Amendment to the United States Constitution. Witnesses for the plaintiffs

established four critical points. The first was that all children with mental retardation are capable of benefiting from a program of education and training. Second, education cannot be defined as only the provision of academic experiences for children, thereby legitimizing experiences such as learning to clothe and feed themselves as an outcome for public school programming. A third point was to provide all children in the Commonwealth of Pennsylvania with a free, public education which meant that the state could no longer deny access to free, public education to students with mental retardation. Finally, it was stipulated that early intervention and services were key for maximum educational benefit. Therefore, allowing preschoolers with retardation access to preschool programs was a vital requirement (Zettel & Ballard, 1982). In addition to the PARC case, another landmark case that pioneered rights for students with disabilities was *Mills v. Board of Education of Washington DC*.

Mills v. Board of Education of Washington DC of 1971. *Mills v. Board of Education* was filed against the District of Columbia's board of education on behalf of all out-of-school students with disabilities. The action was brought by the parents and guardians of seven children who presented a variety of disabilities including behavior problems, hyperactivity, epilepsy, mental retardation, and physical impairments. The suit, which was based on the Fourteenth Amendment, charged that the students were improperly excluded from school without due process of law (Zettel & Ballard, 1982).

Mills resulted in a judgment against the defendant school board that mandated that the board provide a publicly supported education to children with disabilities. In addition, the court ordered the District to provide due process safeguards. Moreover, the court clearly outlined due process procedures for labeling, placement, and exclusion of students with disabilities (Zettel & Ballard, 1982). The procedural safeguards included the following: the right to a hearing with

representation, a record, and an impartial hearing officer; the right to appeal; the right to have access to records; and the requirement of written notice at all stages of the process. These safeguards became the framework for the due process component of the Education of All Handicapped Children's Act (EAHCA) and led the way for Title IX of the Education Amendments of 1972 (Yell & Rogers, Rogers, 1998).

Education of All Handicapped Children Act (PL 94-142) of 1975. On November 29, 1975, President Gerald Ford signed Public Law 94-142 (PL 94-142), the Education for All Handicapped Children Act of 1975 (EAHCA). This law was built heavily on the policy victories that were won in the nation's courts and state legislatures. Additionally, the act is based upon principles of sound educational practice that, although applicable to all children including the handicapped, were often pioneered and articulated by special educators (Weintraub, Abeson, & Braddock, 1977).

As landmark legislation, PL 94-142 assured access to public education for all children, without regard for disabling conditions. In prior times, children who did not "fit" into the context of a typical student were often excluded. This new law mandated that schools "fit" the needs and abilities of the child. This new act also contained specific language guaranteeing many things we now take for granted: a free and public education, due process, nondiscriminatory assessment, and an Individual Educational Plan (IEP) for every qualifying child with a need for special education. It also stipulated that educational services should be provided in the least restrictive environment (LRE) as often as possible (Zirkel, 2003).

For its time, PL 94-142 and the Rehabilitation Act of 1973 were landmark achievements for the inclusion of individuals with disabilities. Although many of the sections of the Rehabilitation Act pertain to adults in the workforce, the groundwork was laid for continuing

legislation for students with disabilities. The second era of disability legislation set distinct standards in providing all students with a free, appropriate public education (Zirkel, 2009c).

The Second Era: Constriction. Reflecting the swing of the political pendulum to the right in the late 1990s, the second phase of disability rights was marked by a series of court decisions that constricted interpretation of disability criteria. The two most significant decisions were *Sutton v. United Airlines, Inc.* (1999) and in 2002, the *Toyota Motor Manufacturing v. Williams* (Zirkel, 2009a).

Sutton v. United Airlines, Inc. (1999). One of the most significant court cases of the Restriction Era of Section 504 was *Sutton v. United Airlines, Inc.* (1999). In *Sutton*, the Supreme Court ruled that the “substantially limits” criterion is not met if mitigating measures, such as medication, are being used. Thus, a student with attention-deficit hyperactivity disorder (ADHD) or asthma whose major life activity of learning or breathing is substantially limited would not be eligible for a 504 plan if the use of medication reduced his or her impairment to the point of a negligible or moderate, rather than substantial limitation.

Toyota Motor Manufacturing v. Williams (2002). In the *Toyota* case, the employee had carpal tunnel syndrome and argued that this physical impairment substantially limited the major life activity of performing particular manual tasks on the vehicle assembly line. The lower courts had already decreased her chances of disability coverage by interpreting work as a broad range of jobs she could perform and not just her particular position. The Supreme Court concluded that because she could perform manual tasks of central importance to daily living, such as brushing her teeth and cooking her food, she did not qualify for federal disability discrimination coverage. In this case, the Supreme Court interpreted congressional intent as limiting Section 504 and the

ADA to a “demanding” eligibility standard by defining a major life activity as only an activity of central importance to daily living (Zirkel, 2008).

In regard to Section 504, the lower courts followed the Supreme Court’s lead by narrowing their interpretation of the definition of disability based on the general applicability of the *Sutton* and *Toyota* decisions (Zirkel, 2003). In 2008, Holler and Zirkel reported that district attorneys, knowing that the courts had narrowly interpreted eligibility under Section 504, suggested that districts not over-identify students under Section 504. Many districts seemed to follow this suggestion due to lack of funding and professional development. Unlike the IDEA, districts do receive additional funds for students who qualify for Section 504 services and protections. In response to a lack of funding, many districts restricted individualized eligibility criteria under Section 504, rather than offering 504 plans as a “consolation prize” for not qualifying for services under IDEA (Weiss, 2000). Therefore, school districts across the nation began to tighten the reins on qualifying students for protections under Section 504. These court cases where the driving force in removing discrimination against persons with disabilities through the 1990 law, the Americans with Disabilities Act (Smith, 2002).

The Americans with Disabilities Act (1990). Like Section 504, the Americans with Disabilities Act (ADA) was passed as a civil rights legislation for individuals with disabilities. Unlike Section 504, the ADA applied to almost every entity in the United States, regardless of whether they receive federal funds. Churches and private clubs were the only two entities exempt from the ADA. Therefore, private schools not associated with a religious organization had to comply with the provisions of the ADA. These schools were exempt from Section 504 because they did not receive federal funds (Smith, 2002).

With considerable fanfare, President George H. W. Bush signed into law the Americans with Disabilities Act of 1990. Designed to ameliorate systemic discrimination against persons with mental and physical disabilities, the ADA addressed critical areas such as employment, housing, public accommodation, recreation, institutionalization, health services, voting, and access to public services. The ADA initially provided favorable results for ADA complainants. However, several U.S. Supreme Court decisions subsequently weakened the impetus of Title I of the ADA, which covers the provisions relating to employment (Mitchell, 2017).

Individuals with Disabilities Education Act (IDEA). In 1975, this federal law was originally known as the Education of Handicapped Children Act (EAHCA). In 1990, amendments to the law were passed, effectively changing the name to the Individuals with Disabilities Act (IDEA). In 1997, and again in 2004, additional amendments were passed to ensure equal access to education. ADA outlines a range of special education settings and placements for students with disabilities that exist on a continuum. Under IDEA, eligible students with disabilities in public schools must be educated, to the maximum extent appropriate, with children who do not have disabilities (Section 504 of the Rehabilitation Act, (1973) 29 U.S.C. 104). Students with disabilities can only be educated in a more restrictive setting when the severity of the student's disability sufficiently impairs the student's ability to be in a general education classroom (Strassfeld, 2017).

There are six principles of IDEA: (a) individualized education program (IEP), (b) the guarantee of a free appropriate public education (FAPE), (c) education in the least restrictive environment (LRE), (d) appropriate evaluation, (e) parent and student active participation in the child's education, and (f) procedural safeguards for all participants. When questioning these principles of IDEA, districts look to the courts to set precedents and guidance. The U.S.

Department of Education's Office of Special Education Programs (OSEP) issues written guidance to support the implementation of the Individuals with Disabilities Education Act (IDEA, 1990). OSEP's policy letters provide written guidance and clarification regarding implementation of the IDEA. OSEP typically issues these letters in response to specific questions raised by parents, educators, representatives of advocacy organizations, state educational agencies, early intervention programs and their providers, and other interested parties. OSEP issues broader written guidance in the form of memos, Dear Colleague Letters, or frequently asked questions (FAQ) documents. These are based on information gathered through OSEP. Further guidance is taken from significant court cases such as *Sutton* and *Toyota* (Zirkel, 2009b).

The Individuals with Disabilities Education Improvement Act of 2004

(Reauthorization). The 2004 reauthorization of the IDEA, titled the Individuals with Disabilities Education Improvement Act (IDEIA), governed service provisions for students with disabilities since its promulgation in 1975 as the Education for All Handicapped Children Act (EAHCA). Personnel preparation programs appropriately developed curricula and courses based on its mandates (e.g., least restrictive environment, diagnosis, transition planning, early intervention) as a prescriptive national special education law. Therefore, it is not surprising that Section 504 of the Rehabilitation Act of 1973, a civil rights law that prohibits discrimination against individuals with disabilities by entities that receive federal funding, was virtually ignored by public schools for more than 20 years (Shaw & Madaus, 2008).

In 2008, Holler and Zirkel conducted the only national study of Section 504 eligibility in K–12 education. Holler and Zirkel found that approximately 1.2 percent of public school students had 504 plans in 2008. Many of these students who requested eligibility for Section 504 did not fit into the constrictive interpretive standards that the courts had established. The study

also found that 504 plans were more common, to a statistically significant degree, in the secondary grades than the elementary grades. These types of restrictions on accessing Section 504 accommodations and protections would ultimately be overturned in the Third Era through the Americans with Disabilities Act Amendment Act (ADAAA) of 2008.

The Third Era: Expansion. Zirkel (2009b) described the 2008 overhaul of Section 504 as the Expansion Era. Under amended federal guidelines, the qualifying categories for protection under Section 504 were expanded. Under these new standards, educators saw a notable increase in the number of students claiming disability coverage for limitations not before recognized by the federal government. This new amendment to the ADA significantly altered Section 504's qualification standards.

In November 2008, Congress amended the narrow judicial interpretations of Section 504, expressly rejecting the Supreme Court's interpretation of disability in previous court cases (*Sutton* and *Toyota*). This modified act was called the Americans with Disabilities Act Amendment Act of 2008 (ADAAA). Although the amendments primarily focused on employment—with special emphasis on returning Iraq veterans—the ADAAA dramatically expanded K–12 students' eligibility under Section 504. Each of the three elements of the disability definition was affected by this legislation (Sepiol, 2015).

First, the ADAAA retained the open-ended interpretation of physical or mental impairment. Confirmed by the omission of a limited list of impairments, Section 504 now included a vast and ever-expanding array of conditions. Previous legal cases have dealt with impairments now included as possible 504 disabling conditions (ADHD, allergies, asthma, chronic fatigue syndrome, diabetes, dysgraphia, dyslexia, dysthymia, encopresis, juvenile

rheumatoid arthritis, oppositional defiant disorder, and undifferentiated somatoform disorder) (Zirkel, 2009b).

Second, the ADAAA expanded the list of major life activities to include reading, concentrating, thinking, sleeping, eating, and major bodily functions. This change significantly impacts districts and the number of students who now may qualify for Section 504 accommodation and protection. The amendments further codified all of these items into legislation, rather than only specifying them in regulations, which was less effective in courts and easier to eliminate. This was an important change as most Section 504 court cases rely on past judgment in order to make consistent rulings.

Third, the ADAAA significantly expanded the criteria for substantial limitation by (a) requiring impairments that are episodic or in remission to be measured when they are active; (b) directing that the use of mitigating measures not be considered; (c) providing an expansive list of mitigating measures, including low-vision devices (except eyeglasses or contact lenses), hearing aids, cochlear implants, assistive technology, learned behavioral or adaptive neurological modifications, and reasonable accommodations; and (d) clarifying that eligibility determinations need not entail “extensive analysis” and should be expansive, rather than narrow. Under these new standards, we can expect a notable increase in the number of students claiming disability coverage for limitations for major life activities that are related to learning, such as concentrating, and those beyond learning, such as eating (diabetes, food allergies) (Smith, 2001).

During this third era of expansion, there were many questions about the extent of the schools’ obligations to an expanded pool of eligible students. Because Section 504 is an “unfunded mandate,” additional qualifying students would further constrict resources of the public schools. Public schools still grapple with the school’s obligation to provided services

under the new mandate. It is still not clear whether eligible students are automatically entitled to 504 plans. Section 504 does not explicitly require a formal document for each student, but the Office of Civil Rights tends to focus on procedures, such as documentation, rather than their substance, such as the appropriateness of the accommodations or services that the school has provided (Zirkel, 2009b).

Summary of the History of Law for Individuals with Disabilities

For decades, Section 504 has taken a backseat to the IDEA in the public schools. During the first era of its existence, schools became aware that Section 504, unlike the IDEA, addressed regular, not special, education. During the second era, the courts narrowed their interpretation of eligibility for 504 plans. During the third era, effective at the beginning of 2009, the ADA expanded eligibility for both employees and students. It was now more important than ever for school administrators to be legally literate and professionally compliant with the new meaning of the Section 504 and ADA definitions of disability (Zirkel, 2009c). In the following section, the application of Section 504 in the K-12 environment will be analyzed.

Understanding Section 504 of the Rehabilitation Act in Public K-12 Schools

Section 504 of the Rehabilitation Act provides a broad spectrum of protections against discrimination on the basis of disability. In the school setting, all qualified elementary and secondary public school students who meet the definition of an individual with a disability under Section 504 are entitled to receive regular or special education. Related aids and services must also be designed to meet the individual's educational needs as adequately as the needs of students without disabilities (Individuals with Disabilities Education Act, 20 U.S.C. § 1400-1419, 1990). This section will review the specific requirements which must be met in order for students to receive the protections that Section 504 provides. The intricacies of the Section 504 referral

process and a detailed explanation of eligibility determinations will lay the groundwork in understanding how accommodation plans are developed and implemented. Finally, current implementation practices and educational professional development will be highlighted in order to spotlight current needs in the educational field of Section 504.

Section 504 and IDEA definitions. Section 504 of the Rehabilitation Act provides a different and generally broader definition of disability than the Individuals with Disabilities Education Act (IDEA). The three criteria, which are all essential under this definition, are (a) physical or mental impairment, (b) major life activity, and, directly connecting the first two criteria, (c) substantial. Unlike IDEA eligibility, the impairments are not limited to a relatively small set of specified classifications; the affected activities are not limited to academic areas, and the ultimate essential is not the need for special education. Moreover, the Americans with Disabilities Act (ADA) amendments of 2008 and the resulting ADA regulations of 2016 broadened the standards for eligibility under Section 504 in significant ways, such as (a) expanding the identified examples of major life activities—such as reading, concentration, manual tasks, eating, and bowel functions—and (b) requiring the determination of the “substantial” criterion without mitigating measures, such as medication.

Section 504 referral process. School districts are responsible for the identification, evaluation, and determination of a student suspected or thought to have a disability under Section 504 (Zirkel, 2009c). Anyone can refer children for Section 504 and ADA services. Although it is impossible to specify all situations in which children should be referred for Section 504 and ADA services, there are several situations that should result in automatic consideration of a student for Section 504 and ADA services. Table 2 explains the various persons who may refer a student and the characteristics of that referral.

Table 2

Causes and Associated Characteristics for Section 504 Referrals

Cause	Referral Characteristic
Student based	When a student: -is referred for IDEA services but the decision is not to evaluate -is evaluated for IDEA services but is determined not eligible -is suspected of having a disability -continues to display behavior problems -has major health problems -is expelled or suspended -seems to be having problems that cannot be explained
Teacher Driven	When a teacher requests consideration for ADA or 504 services
Parent Driven	When a parent requests consideration for ADA or 504 services

Teachers and parents make most of the referrals for 504 interventions (Fossey, *et al.*, 1995). However, anyone can refer a child for evaluation under Section 504. Therefore, a school district does not have to refer or evaluate a child under Section 504 solely upon parental demand. The key to a referral is whether the school district staff suspects that the child is suffering from a mental or physical impairment that substantially limits a major life activity and is in need of either regular education with supplementary services or special education and related services (Letter to Mentink, 1993). If a parent requests a referral for evaluation, and the school district refuses, the school district must provide the parent with notice of their procedural rights under Section 504 (Zirkel, 2003).

As with the IDEA, general education teachers in primary grades are in an excellent position to make referrals for Section 504 and ADA services and protections. Unfortunately, these teachers are often not aware of the provisions of Section 504 and the ADA, nor do they know which students should be referred for Section 504 and ADA services. These are reasons schools need to have policies for providing Section 504 and ADA services, as well as training programs for general education teachers (Smith, 2002). The Section 504 team develops and implements the Section 504 process.

Just because a child is referred for Section 504 accommodations does not mean the child will be determined eligible. A 504 referral is simply a first step of consideration in the process of eligibility. Often, parents think that if they provide the team with a diagnosis from a physician stating that a child has a particular disability, such as ADD/ADHD, the school will have to serve the child under Section 504 and the ADA. This is simply not the case. A diagnosis by anyone is only part of the referral consideration (Zirkel, 2008).

Review of Existing Data. After a child has been referred, either by school personnel or parents, the school is obligated to consider the referral. A group of knowledgeable people should come together to decide whether they think the child is eligible. Schools do not have to evaluate a student who has been referred if school personnel do not believe that the child is eligible under Section 504 and the ADA (Smith, 2001). Observations, anecdotal information, and judgments are considered legitimate sources of assessment data. Norm referenced, standardized tests are not required as part of the evaluation. If data from these sources are considered necessary to make eligibility decisions and decisions regarding accommodations and modifications, then they should be used, but only if the team needs such information. If school personnel believe that a medical evaluation or another evaluation from a specialist is needed in order to make an

eligibility decision or to determine accommodations, then the school is obligated to obtain the evaluation and pay for the evaluation (Smith, 2001).

Evaluation for Section 504. Under Section 504, no formalized testing is required when evaluating a student for eligibility. The 504 team should review grades over the past several years, teachers' reports, information from parents or other agencies, state assessment scores, or other school administered tests, observations, discipline reports, attendance records, health records, and adaptive behavior information. Schools must consider a variety of sources. A single source of information (such as a doctor's report) cannot be the only information considered. Schools must be able to assure that all information submitted is documented and considered (Durheim, 2017). Once all of the information is reviewed, the team will make a determination of eligibility for Section 504 accommodations and protections.

Eligibility Determination. When determining whether there is a substantial limitation to a major life activity, school personnel should consider the duration and severity of the impairment. In 2007, Smith, Polloway, and Patton developed a process for assisting school personnel in making this decision. This procedure uses a Likert scale to determine the degree of severity and duration for various functional limitations. The use of such a process can greatly facilitate the arrival at a defensible decision regarding eligibility for Section 504 and ADA services. School personnel must remember that the decision is based on their professional judgment about the child's functioning. Test scores, numerical indices, and discrepancy formulas should not be used as the primary determining factors. Although physicians and other health professionals may make various diagnoses, school personnel make the eligibility determination. Parents can always contest the decision through due process hearings, but the determination regarding eligibility rests with the school (Smith, 2001). Once eligibility is established, the team

must decide what accommodations, if any, are needed for the student to receive a free appropriate public education.

Section 504 Accommodation Plan. After a child has been determined to be eligible for Section 504 services and protections, an individual plan must be developed. Unlike IDEA, schools do not have to develop Individualized Education Programs (IEPs) for students served under Section 504. However, they do have to develop individual services and accommodation plans for students under Section 504. Section 504 does not specify the contents of the plan, but the plan must be designed to meet the needs of individual students, including specific accommodations and modifications that are necessary to meet the requirements of FAPE (Smith, 2002).

Section 504 accommodation plans should be given to the instructional team to use. These plans should be simple and easily understood, yet they should be able to include the important information that will enable school personnel to implement the necessary accommodations to meet individual needs (Smith, 2002). For the most part, accommodations for this group of students are inexpensive. Common sense modifications help give students equal access to learning and extracurricular activities. Good teachers have used these types of accommodations and modifications for years (Smith, 2002).

Like placement options with IDEA, instructional teams must always strive to provide student's education in the least restrictive environment. However, there are exceptions to this rule. A Section 504 eligible child will always be in the regular classroom unless the student with a disability is so disruptive in a regular classroom that the education of other students is significantly impaired, then the needs of the student with a disability cannot be met in that

environment. Therefore, regular placement would not be appropriate to his or her needs (Section 504 of the Rehabilitation Act, (1973) 29 U.S.C. 104).

The specific actions that schools must take in order to comply with the FAPE requirement of Section 504 and the ADA vary with each child. In most situations, simple, inexpensive accommodations and, modifications are sufficient. Students with disabilities classified under Section 504 usually do not receive special education services. They tend to get modified services that meet their individual needs (Zirkel, 2009a).

Determination of what services, accommodations, and modifications are appropriate for each child is based on the nature of the disabling condition and what that child needs in order to have an equal opportunity to compete when compared to the non-disabled. Each child's needs are determined individually. There is no guarantee of A's or B's or even that the student will not fail. Students are still expected to produce. The ultimate goal of education for all students, with or without disabilities, is to give students the knowledge and compensating skills they will need to be able to function in life after graduation (Durheim, 2017). Regardless of the specific action needed, schools are required to ensure that students with disabilities under Section 504 and the ADA are provided with a FAPE (Smith, 2002).

Current Section 504 Practices

For schools to provide an appropriate education for students who are protected under Section 504 and the ADA, accommodations and modifications are generally necessary. The vast majority of accommodations and modifications for students served under Section 504 and the ADA occur in general education classrooms. Examples include accommodations in seating arrangements, testing modifications, homework modifications, the use of readers or taped materials, and accommodations in attendance policies (Smith, 2002). Many educators struggle

with the legal requirements for students with disabilities, in part, due to insufficient preservice preparation and lack of differentiation between “lore” and law when “learning on the job.” The majority of in-service legal professional development is one of the requirements of the IDEA, which leaves Section 504 as a misunderstood and often misapplied “consolation prize.” As a result, short-term concerns with high-stakes tests and other academic hurdles extend limited local resources under this “unfunded mandate” for band-aid forms and accommodations that, in the long term, compound rather than resolve the interest in educational success. Because of frequent confusions between Section 504 and IDEA requirements and legal issues, high quality professional development is needed to teach educators the latest corresponding IDEA and Section 504 developments (Zirkel, 2019).

Section 504 Team. Any adult that comes in contact with the student during the school day is considered as part of the instructional team. This can often go beyond the student’s regular grade level teacher to include outside service providers that may have valuable data to share about the student’s needs and concerns. This instructional team will typically act as the student’s Section 504 team as well. According to the federal regulations: “...placement decisions are to be made by a group of persons who are knowledgeable about the child, the meaning of the evaluation data, placement options, least restrictive environment requirements, and comparable facilities” (Section 504 of the Rehabilitation Act, (1973) 29 U.S.C. 104). A student’s instructional team makes educational decisions about the student’s current and future placements and services so the student can continue to progress in the general education curriculum. Beyond Section 504 coordinators, teachers, nurses, counselors, principals, and parents are all an important part of the Section 504 team.

Section 504 coordinators. Under Section 504 of the Rehabilitation Act of 1973, each school district that receives federal financial assistance must designate an employee to coordinate the Section 504 requirements (Section 504 of the Rehabilitation Act, (1973) 29 U.S.C. 104). The Section 504 coordinator, employed by the school district, can have additional job requirements and responsibilities such as an elementary principal or assistant principal at the high school. Typically, guidance counselors and special education directors have been saddled with Section 504 responsibilities. All too often, these individuals have a full plate and have little time to meet the demands of Section 504 responsibilities.

The ADA also has a requirement for an individual to be identified for purposes of coordinating efforts to comply with the ADA (Americans with Disabilities Act of 1990, 42 U.S.C. § 12101 et seq.). No prohibition is made against the same person serving as both Section 504 and ADA coordinator. However, the law does not assume that identifying one person as a coordinator automatically requires that person to coordinate both laws (Sepiol, 2015). School districts must be very clear when assigning administrative duties that each coordinator, or a single coordinator, understands the laws they are to coordinate.

According to Richards (1994), the Section 504 coordinator should be responsible to develop and maintain a Section 504 program, distribute the necessary documentation and information to all campuses, and oversee the progress of all Section 504 committees. Additionally, Section 504 coordinators should provide training to school personnel who are involved in the process of designing and implementing individual accommodation plans for students. They should also keep current on the legality issues regarding Section 504 and handle parent complaints, coordinate responses to the Office of Civil Rights and make necessary arrangements for due process hearings (Richards, 1994).

In 2007, a study by Chiasson and Olsen revealed that parents and teachers did not have a clear understanding of the roles and responsibilities of the Section 504 coordinator in the development and implementation of individual accommodation plans. Therefore, the qualifications of the section 504 process coordinator must be comprehensive enough to deal with both legal and educational issues.

Defining qualifications of Section 504 coordinators. The identification, assessment, and planning for students who qualify under Section 504 requires the time and expertise of district personnel. Section 504 (and the ADA) requires each district to have a designated coordinator. For all but the largest school districts, designating the coordinator as responsible for both Section 504 and the ADA makes sense because of their largely concurrent coverage (Zirkel, 2012). Large districts may find it efficient to divide responsibilities for student, employee, and facility issues under both these statutes. Regardless of district size, designating not only an overall coordinator at the central office, but also building-level coordinators, is practically effective, although not strictly required (Zirkel, 2012).

“At the central office level, the superintendent should think twice before appointing the district’s special education director as the Section 504/ADA coordinator; it is the opposite of a reward for effectively addressing the challenging responsibilities under the IDEA, and it gives the wrong symbolic message to regular education personnel of the primary child-find and implementation issues for 504-only students,” stated Zirkel 2012 (p.100). Similarly, at the school level, appointing the new counselor or a staff member without the requisite knowledge of the applicable legal requirements and school standing for effective implementation is legally permissible, but practically imprudent (Zirkel, 2012). There are many responsibilities that come

with appointing a Section 504 coordinator that may be overwhelming once coupled with that person's current obligations.

Roles and responsibilities. Under Section 504 of the Rehabilitation Act of 1973, each school district that receives federal financial assistance must designate an employee to coordinate the Section 504 requirements (Section 504 of the Rehabilitation Act, (1973) 29 U.S.C. 104). The Section 504 coordinator, employed by the school district, can have additional job requirements and responsibilities such as an elementary principal or assistant principal at the high school. For districts that have 15 or more employees, Section 504 requires that at least one person be designated to coordinate its compliance efforts (Section 504 of the Rehabilitation Act, (1973) 29 U.S.C. 104). Contained within the nondiscrimination notice should be the identity of the coordinator. Failure to identify the coordinator may be an actionable violation of Section 504 (Garfield (NJ) School District, 18 IDELR 545, 1991).

Section 504 does not specify the credentials that the coordinator must have relative to performing the duties (Sepiol, 2015). In most cases, a public school district's Section 504 coordinator reports to its superintendent. Section 504 requires that school districts employing 15 or more persons designate someone to coordinate compliance with 504 regulations. This local 504 contact person, or coordinator, may be someone from general education, such as a school administrator or superintendent, who is knowledgeable about Section 504 (Shaw & Madaus, 2008). This position may not require an additional staff member, as each district could utilize existing personnel resources for fulfilling this role. In 2003, Lashley and Boscardin reinforced the important role special education administrators play in implementing IDEA. However, because section 504 is a civil rights law, responsibility for its implementation involves a range of school based professionals, including administrators, general education teachers, school

counselors, school psychologists, and special-education teachers. Further, implementing Section 504 mandates may best be viewed as a general education effort because services are primarily provided in the general education classroom (Shaw & Madaus, 2008).

Fortunately, most of the procedural requirements of Section 504 mirror the procedural requirements of the IDEA. Because school districts already have IDEA procedures in place, administrators should not be daunted by the mandates of Section 504. Some districts may choose to follow IDEA procedures for complying with Section 504, whereas others may find it more feasible to develop a parallel, customized set of procedures for meeting their Section 504 obligations.

In 2006b, Madaus and Shaw surveyed educators on the implementation of Section 504 in their districts. The respondents reported being actively involved in a variety of Section 504 roles. When asked who served as the person responsible for overall school compliance with the regulations of Section 504, the most frequently identified titles were school counselors (16%), school psychologists (9%), principals (8%), and assistant/vice principals (8%). The data presented by Madaus (2005) and Madaus, Shaw, and Zhao (2005) indicated that at the school level, leadership of Section 504 activities was mostly the responsibility of related service personnel (e.g. school psychologists, counselors, social worker) or school administrators (e.g. principal, assistant principal).

Special educators. Although it is appropriate for a broad range of professionals to have responsibility for implementing Section 504, special education personnel are the chief advocates for students with special needs (Madaus & Shaw, 2006a). Their limited involvement with Section 504 should not be from lack of knowledge. The Council for Exceptional Children Common Core of Knowledge and Skills for All Beginning Special Educators requires

professional activities to be “consistent with the requirements of law, rules and regulations” (Council for Exceptional Children Website, 2004). Personnel preparation programs have, with good reason, focused on the very prescriptive requirements of IDEA. Unfortunately, Section 504 and the related Americans with Disabilities Act (1990) have received very little attention (Madaus & Shaw, 2006b). It is necessary for programs preparing special education personnel to include specific instruction on the implementation of Section 504 as part of the required program of study (Shaw & Madaus, 2008).

Counselors. School counselors have a meaningful role in helping to address student needs and are an integral member of a student’s 504 team when that student falls under their caseload. School counselors may be the first line of contact from a parent to report a mental health or other disorder. School counselors may also be the initiator of an intervention for a struggling student (Gysbers & Henderson, 2012).

School counselors are an important part of student staffings or evaluations. They are regarded as knowledgeable, educated professionals able to share insight on particular students, as well as resources and interventions. School counselors have a responsibility to develop and provide a comprehensive school counseling program for all students, including students with disabilities. The initiating, writing, and management of the 504 process falls under the non-guidance category of special programs and services according to the Missouri Comprehensive School Counseling Program (American School Counselor Association (AMSC) Position Paper, 2015). In their position statement on disabilities, the writing, coordinating, and supervision roles related to implementing Section 504s are not appropriate duties of a professional school counselor (ASCA Position Paper, 2015). Placing the school counselor in the role of the Section 504 coordinator or case manager has a detrimental effect on the counselor’s ability to provide a

comprehensive school counseling program to all students. However, the newest ASCA's Position Statement (as of spring, 2018) also states the school counselor is an advocate for the student and may be an essential member of the 504 team. The strengths the school counselor brings as an effective communicator, collaborator, problem solver, interventionist, liaison, and mental health specialist creates a unique role for them on the 504 team.

The conflict the 504 coordinator/case manager duties create for school counselors include but is not limited to: lack of professional training in 504 and OCR (Office of Civil Rights) legalities and paperwork; dual relationship conflicts; extensive clerical time demand; counselors are mental health professionals as opposed to special education professionals; superior or administrative position with teachers; possibly a perceived adversarial role with parents instead of advocacy; creation of a barrier of availability to provide responsive services. When time is taken away from a school counselor, their ability to make a positive impact on student outcomes suffers (Gysbers et al., 2011).

The Missouri School Counselors' Association (MSCA) agrees that school counselors should not be responsible for the development, implementation, and monitoring of any 504 plans. MSCA, in agreement with ASCA and the Missouri Comprehensive School Counseling Program, as designed by DESE, supports the position of excluding 504 case management responsibilities from the assigned duties of school counselors (Gysbers et al., 2011).

Nurses. On January 1, 2009, amendments to the Americans with Disabilities Act (ADA) went into effect, and the school nurse's role became integral to a significant number of students under Section 504. The amendments added health related functions nurses are familiar with in identifying major life activities. This new amendment has expanded the role of the school nurse within the decision-making process and the IEP and 504 plans. Furthermore, it created an ever

expanding role for schools when providing FAPE in the least restrictive environment (LRE) (Zirkel, 2009a). The school nurse has a key role in interpreting the student's health status and explaining the impairment, such as asthma, diabetes, severe food allergy, or complex fracture of the femur in terms of: (a) the major life activity affected; (b) whether the limitation for this student at the current time is considered mild, moderate, or severe, and why; and (c) the known or anticipated duration of limitation.

Regular Educators. Smith (2002) stated that Section 504 is not the responsibility of special education; rather, it is the responsibility of general education to comply with Section 504. Therefore, it is especially critical for general education teachers to understand the educational implications of Section 504 as it relates to students in their classrooms. Within school settings, where the institutions of education and law intersect, teachers exhibit a generalized lack of legal knowledge pertaining to their roles and responsibilities as educators (Young, Kraglund-Gauthier, & Foran, 2015). Many states require a special education or inclusion course(s) or specified content for all personnel to be certified to work in schools (i.e., general education teachers and administrators, related services personnel). The data reported by Madaus and Shaw (2006a) indicated that general education teachers are actively involved in implementing Section 504, particularly in managing Section 504 plans (38%), for which they were reported to be the second most frequently responsible professional group. Although Section 504 is not a special education law, introduction to special education or inclusion courses at the preservice level may be the one opportunity to get Section 504 information to many general educators. Thus, it would seem critical that information on inclusive schools include objectives and activities related to Section 504.

Principals. School principals or assistant principals often serve as the school-based Section 504 coordinator and are often involved in coordinating Section 504 meetings and managing developed Section 504 plans (Madaus & Shaw, 2006a). Crockett (2002) noted, however, that building administrators have limited professional training in the area of special education and limited knowledge of the needs of students with disabilities. Crockett also indicated that accreditation guidelines for building administrators do not include expectations of knowledge or skills to fulfill these responsibilities. Bays' (2004) call for leadership preparation programs for future administrators to integrate "special education knowledge, skills, and dispositions across their curricula" (p. 258) would go a long way toward preparing principals for their critical role as leaders for Section 504 implementation in the schools.

Parents. Unlike special education, the federal regulations for Section 504 do not require or even mention that parents are to be a part of the decision-making committee (Durheim, 2017). The decision to include parents in the decision-making committee (504 Team) is a determination that is made by each school district and should be spelled out in the district's procedures for implementing Section 504. In 2017, Durheim explains that parents should at least be asked and encouraged to contribute any information that they may have (e.g., doctor's reports, outside testing reports, etc.) that would be helpful to the Section 504 committee in making their determination of what the child may need. Schools are expected to make sound educational decisions as to what the child needs in order to receive an appropriate education. Parents also play a valuable role in identifying and ruling out student concerns (Durheim, 2017).

Section 504 Coordinator Demographics and Professional Development Needs

In 1999, Katsiyannis and Reid conveyed that because educators were relying on IDEA to meet the needs of students who required differentiated instruction, Section 504 had been

largely unused for much of the 1980's and 1990's. However, because Section 504 has seen a re-emergence in the new millennium, this has posed problems for educators. Because most educators lack knowledge of the provisions of Section 504, they are often uninformed of their responsibilities and the rights of qualified students (Katsiyannis & Reid, 1999). In order to correctly implement Section 504, many school district personnel will need more than a set of procedures to implement this federal mandate successfully (Fossey, *et al.*, 1995).

Section 504 Coordinator Demographics. Madaus and Shaw (2006b) and Madaus, Shaw, and Zhao (2005) presented data from a survey of all of the special education directors in one state about district-wide 504 policies and procedures. Given that special education/pupil services directors coordinated Section 504 compliance in two thirds of the districts, it is clear that district management of Section 504 has become a *de facto* special education responsibility even though it is clearly not intended to be. This study presents data from a survey that was distributed to a range of school-based professionals (general education teachers, school administrators, school counselors, school psychologists, social workers, and special education teachers) in one northeastern state. Even though this data is over 10 years old, it continues to be relative because it is one of the only surveys given to staff designated as Section 504 coordinators in the United States.

Based on a response rate of 46% (n = 259), results indicate that 84% had served on a Section 504 team. Table 3 indicates responses found within that study.

Table 3

2006 Survey Data of Section 504 Team Demographics

Respondent Information	Responses	Percentage
Type of district:		
Rural	37	44
Suburban	39	46
Urban	8	10
Formal Section 504 policy:		
Yes	66	79
No	17	20
Don't know/Unsure	1	1
If yes, year the policy was adapted:		
Before 1990	1	1
1990 - 1994	3	7
1995 - 2000	20	44
2001	3	7
2002	10	22
2003	5	11
2004	2	4
No Response	4	1
Designated School District 504 Coordinator		
Yes	79	96
No	2	2
Don't know/Unsure	1	1
Title of School Based Coordinator		
Principal/Asst Principal	34	40
Guidance/Counselor	18	21
School Psychologist	13	15
Social Worker	7	8
Classroom Teacher	3	4
Special Education Director	3	4
Special Education Teacher	2	2
504 Coordinator	1	1
No Response	31	36
Section 504 meeting are coordinated by:		
General Education Teacher	12	14

Table 3 (continued)

Respondent Information	Responses	Percentage
School Administrator	25	29
School Counselor	49	8
School Psychologist	7	72
School Social Worker	61	13
Special Education Director	11	44
Other	37	33
Section 504 plans are coordinated by:		
General Education Teacher	28	39
School Administrators	33	35
School Counselors	30	71
School Psychologists	60	17
School Social Workers	14	53
Special Education Teacher	45	25
Special Education Director	21	55
Other	47	55
Centralized database of Section 504 students?		
Yes, for all schools in district		68
Yes, at the local school level	56	13
Yes, at some, but not all schools	11	0
No	0	18
Don't know/unsure	15	1

Given the increase in the number of students on Section 504 plans and the number of court cases and OCR investigations related to Section 504, it is surprising that 20% of the reporting districts do not have a formal Section 504 policy in place. Interestingly, of the districts that have a policy in place, 91% reported that these policies were put into place within the past ten years, and nearly 50% of these were established in the past three years (Madaus & Shaw, 2006b). Such findings support the suggestion of authors such as Rosenfeld (2013) and Smith (2002) that although Section 504 is more than 25 years old, it was mostly ignored by school districts until recently.

Another important finding was the variation in terms of responsibility for both coordination of overall Section 504 district compliance, and for the actual planning of meetings and coordination of Section 504 plans. In 2006, Madaus and Shaw found that an overwhelming majority of districts (96%) reported having a designated Section 504 coordinator. This seemed to represent an improvement over Seese's (2003) observation that it is not unusual for district personnel to be unaware of which staff member serves in this role, and often, there is no one. Madaus and Shaw (2006a) also reported that the responsibility for being the district 504 coordinator fell to the special education director in two-thirds (66%) of the reporting districts. This finding is in line with Zirkel and Kincaid's (1995) observation that while the ultimate responsibility for Section 504 compliance lies with the superintendent of a district, special education directors are most often responsible for carrying out the law.

In 2006, the Madaus and Shaw study uncovered many other important topics related to Section 504 that had never been studied. In this study, special education directors reported having a "high" knowledge of Section 504 regulations ($M = 4.1$ on a 5-point scale), with 77% describing their knowledge level as "high" or "very high". However, at the individual school level, there appears to be a network of professionals responsible for ensuring Section 504 compliance. In those districts that reported having Section 504 coordinators in individual schools, the duties most often fell to the principal or assistant principal (40%), followed by school counselors (21%) and school psychologists (15%) (Madaus & Shaw, 2006b). The coordination of individual Section 504 meetings fell to a wide range of professionals, most often social workers (72%) and school counselors (57%). School counselors (71%) and social workers (53%) were also frequently reported as being responsible for coordinating Section 504 plans. It is interesting to note that general education teachers were more often responsible for coordination

of Section 504 plans than special education teachers (39% versus 25%). In addition, related services personnel have major responsibility for implementation of Section 504 in the schools (Madaus & Shaw, 2006b).

Section 504 Professional Development Needs.

In a secondary study from 2006(c), Madaus and Shaw presented data from a survey of all of the special education directors in one state about district-wide 504 policies and procedures (state identification was not given). Madaus and Shaw discovered that the special education/pupil services director also coordinated Section 504 compliance in two-thirds of the districts surveyed. In reviewing these findings, it is clear that district management of Section 504 had become a de facto special education responsibility in this state, even though current research suggested that Section 504 was a regular education initiative. Table 4 is a summary of the results from the 2006(b) Madaus and Shaw survey data of Section 504 practices in one northeastern state.

Table 4

Madaus and Shaw's Analysis of Section 504 Practices in One State

Practice Description	Result
Training and staff development related to Section 504	
Never/Rarely	8%
Sometimes	33%
Often	29%
Always	20%
Section 504 procedures are distributed to professional staff throughout the district	
Rarely	6%
Sometimes	17%
Often	22%
Always	51%
Don't know/Unsure	5%
School personnel always had sufficient knowledge about the law to effectively implement Section 504 plans	
Never/Rarely/Sometimes	21%
Sometimes/Always	23%
Always	66%

After reviewing the data obtained from a survey of all of the special education directors in one state about districtwide 504 training, Shaw and Madaus (2008) concluded that school personnel do not have the necessary information to ensure equal access for students with disabilities under Section 504. In fact, many respondents reported that many districts did not provide training to personnel on Section 504 or even distribute Section 504 procedures to staff. One-third of respondents reported not always having sufficient knowledge about the law to effectively implement Section 504 plans.

All of these studies seem to suggest that Section 504 training is often limited in many schools (Brady, 2004; Shaw & Madaus, 2008). Brady (2004) explained that, all too often, educators are ill-trained in both understanding and implementing Section 504 legal regulations in

their respective schools. He further argued that this need should be addressed through staff development and in preservice teacher preparation programs.

Stressing the need for professional development in the area of Section 504, deBettencourt reported earlier in 2002 that public schools are serving more and more children with attention-deficit disorders and children with learning disabilities. With the increase in numbers of students with these disabilities, the understanding of Section 504 and its distinguishing provisions is critical. However, a review of professional literature indicates that professional development regarding Section 504 is not common. In 2010, Schraven and Jolly concurred, noting that Section 504 is often left to the wayside by teachers and administrators due to a lack of understanding and professional training.

There is an array of content, including knowledge of the law, differences between Section 504 and IDEA, and specific information about Section 504 eligibility, policies, procedures, and student plans, that need to be understood when participating as a 504 team member (Madaus & Shaw, 2006c). The Council for Exceptional Children has developed knowledge and skills standards for special education administrators (Council for Exceptional Children, 2004) that can be used as training tools for new special education administrators. These standards specify knowledge of “laws and policies for general and special education” and the skill to “interpret laws and policies.” It would be appropriate for districts to utilize these professional standards when creating professional development for 504 teams and administrators (Madaus & Shaw, 2006a). In recent years, Section 504 has received increased attention as school districts attempting to meet the demands of the expanded Section 504 definition (Council for Administrators of Special Education, 1999). To their detriment, many districts look to hand off this responsibility to current employees. Section 504’s broad definition of disability has

amplified its importance as students with hidden disabilities (e.g., attention-deficit/hyperactivity disorder, learning disabilities, and processing disabilities) seek protections under this law (Katsiyannis & Conderman, 1994).

It is also important to note that at both secondary and postsecondary levels, eligibility for Section 504 services is only designed for individuals with a physical or mental impairment that substantially limits one or more major life functions. Although some students who do not meet eligibility criteria under IDEA may be covered under Section 504, the regulations do not extend to those students who do not have a disability but who struggle in some aspect of their education, such as taking exams (Madaus & Shaw, 2006b). Increasingly, students without disabilities are submitting secondary level Section 504 plans to postsecondary institutions to receive similar accommodations. In these plans, the rationale for accommodations is that although no disability is documented, the student needs extended time to take exams. These students may have become accustomed to, and perhaps dependent on, exam accommodations, but they may not be eligible for such services at the postsecondary level. If providing accommodations for these students is an attempt to assist in meeting the demands of the high school curriculum and to make the student appear qualified for a postsecondary program, it could be detrimental to the student in the long term when the accommodations are no longer available (Madaus & Shaw, 2006b).

In seeking Section 504 protections, parents of students may reach out to the Office of Civil Rights (OCR) for assistance through a formal complaint process. OCR, a component of the U.S. Department of Education, enforces Section 504 discrimination against individuals with disabilities (Office of Civil Rights, 2019). Each complaint filed with the Office of Civil Rights is investigated for possible discrimination. If OCR determines that a recipient failed to comply with the civil rights law(s) that OCR enforces, OCR will contact the recipient and will attempt to

secure the recipient's willingness to negotiate a voluntary resolution agreement. If the recipient agrees to resolve the complaint, the recipient will negotiate and sign a written resolution agreement that describes the specific remedial actions that the recipient will undertake to address the area(s) of noncompliance identified by OCR.

The terms and obligations of the resolution agreement, if fully performed, will remedy the identified violation(s) in compliance with applicable civil rights law(s). OCR will monitor the recipient's implementation of the terms and obligations of the resolution agreement. This verifies that the remedial actions agreed to by the recipient are being properly implemented (Office of Civil Rights, 2019).

From 2014-2016, the Office of Civil Rights has assisted Missouri parents in resolving alleged disability discrimination in 16 OCR complaints across the state. Of those 16 complaints, four were filed against post-secondary institutions. The remaining 12 complaints were filed against Missouri school districts (Office of Civil Rights, 2019). To ensure compliance with Section 504 and to resolve the allegations of the complaints, the districts submitted agreements to settle the complaints. Because the districts submitted, and OCR accepted, the agreements prior to the conclusion of OCR's investigations, OCR made no findings of fact or law and did not issue final determination with respect to the allegations. The districts voluntarily agreed to take action in different forms to absolve the complaint.

These actions (non-monetary restitutions) from districts can be achieved through a variety of means (compensatory services, conducting re-evaluations, conducting manifestation determinations, assuring non-discrimination notices are posted, etc.). However, one area of restitution was utilized more than any other form. "Additional training for district staff on Section 504 policies and procedures" was used in 75% of the Section 504 resolutions cases filed

in Missouri from 2014-2016 (Office of Civil Rights, 2019). With this information in hand, it is obvious that Missouri school districts have a significant, immediate need for thorough Section 504 professional development opportunities. Although Section 504 is not a special education law, introduction to special education or inclusion courses at the pre-service teacher level may be the only opportunity general education teachers get to learn about Section 504 responsibilities (Shaw & Madaus, 2008). Special education courses have, with good reason, focused on the very prescriptive requirements of IDEA. However, it is now necessary for programs preparing all education personnel to include specific instruction on the implementation of Section 504 as part of the required program of study. School administrators should be leading the charge for students to receive FAPE (Shaw & Madaus, 2008).

In a similar study identifying the legal literacy among teachers, Schimmel and Militello (2007) found that teachers were often uninformed or misinformed about student and teacher rights; had taken no courses in school law; and were more likely to have acquired whatever they knew about school law from the other teachers they worked with. Building administrators were noted as having limited professional training in the area of special education and limited knowledge of the needs of students with disabilities. This and the previous studies conclude that knowledge of Section 504 policies and procedures are inconsistent across the country.

Chapter Summary

Unlike the IDEA, which largely affects "special education" professionals, Section 504 requires "front line" educators (i.e., classroom teachers and principals) to provide special education services to children with disabilities. The law affects not only children with injuries, communicable diseases, and various illnesses, but also children with attention deficit disorders. For many educators, the most challenging aspect of Section 504 is not its procedural

requirements, but the substantive aspects of educating children with disabilities (Smith, 2001). Some classroom teachers will want to improve their skills in identifying the children who may have disabilities, especially those with "hidden" disabilities like ADD. Other classroom teachers may feel the need to obtain additional training to help them develop classroom teaching strategies for children with disabilities (Smith, 2001). Most important, educators should not let the procedural requirements of Section 504 divert them from their overall mission to provide the best education possible for all children, whether or not they have a disability defined by federal law. Section 504 is merely a means for ensuring that special populations of students receive what all educators desire—an education that allows every child to grow, prosper, and become a productive citizen (Fossey, Hosie, Soniat, & Zirkel, 1995).

When looking through the lens of social equity and equality in a democratic nation, all citizens should have basic rights, as well as equal opportunities. A properly structured society and government will provide equal opportunities for all citizens (i.e., freedom of speech, freedom of religion). In *A Theory of Justice* (1971), John Rawls suggests that any redistribution of resources within a nation should benefit the least of the poorest citizens. Even though inequality exists in all societies, theorist believes inequalities are acceptable if they actually help out the least fortunate persons in society (Jedicke, 1997).

The literature and social equity theory support an imperative construct that Section 504 accommodations and services can effectively provide the disabled a free appropriate public education in the least restrictive environment. In order to keep up with new litigation and definition changes, Section 504 coordinators must continue to attend and provide ongoing professional development that will assist all other district staff to understand the laws of Section 504.

When designing a review of literature, researchers typically focus on recent, peer reviewed sources for the majority of the literature review. However, as the rights for individuals with disabilities developed, Section 504 only received a moderate amount of attention with its development in 1973 and during its resurgence in 2008 when the bill was reauthorized with expanded parameters. Research from the last 20 years primarily addresses the legalities of the Section 504 process, comparisons of the Individuals with Disabilities Education Act and the Americans with Disabilities Act, and specific accommodations and modifications that may be incorporated into a student's individual accommodation plan. There is a limited amount of current research available that addresses the unique knowledge base required by Section 504 coordinators and the 504 process (Smith, 2002). Additional research is needed to address professional development needs of school employees who are designated to carry out 504 coordinator responsibilities, as past research in this area is non-existent. Continued research in this area is critical to ensure the needs of all students with disabilities are met. It is the hope of this researcher that this study will expand the interest base on Section 504 coordinator needs and add to the sparse amount of recent Section 504 coordinator data and research. As the review of literature unfolds, the limited amount of recent research in this area of education becomes evident. Additional ramifications of this lack of recent research will be explored further in additional chapters.

In Chapter Three, the research methodology used to identify key demographics of Missouri Section 504 coordinators will be discussed. Additional methodology to describe the efficacy of Section 504 coordinators as related to professional development opportunities will also be described. This will lay the ground work for the data analysis in Chapter Four and the conclusions and recommendations in Chapter Five.

CHAPTER THREE

METHODOLOGY

Introduction

Chapters One and Two established that confusion surrounds the requirements and implementation of Section 504 of the Rehabilitation Act of 1973 in United States schools. Because Section 504 receives no federal funding, has few regulations, and relatively minimal litigation as compared to IDEA, Section 504 of the Rehabilitation Act of 1973 is often not properly implemented or may even be overlooked in public schools (Richards, 2010). The primary purpose of this study was to determine if there is a significant relationship between the amount of professional development given to Section 504 coordinators and the efficacy level of those coordinators with primary components of the Section 504 process.

This chapter is composed of nine sections: (a) the design of the study, (b) population, (c) sampling procedure, (d) instrumentation, (e) validity of the instrument, (f) data-collection procedures, (g) variables, (h) statistical analysis, and (i) summary. In Chapter Four, the data results from this study have been analyzed. A summary of the entire study is given in Chapter Five. Implications and recommendations for future study in this area conclude Chapter Five.

Research Questions

This study was guided with the following questions:

1. What are the common demographics of 504 coordinators in Missouri?
2. Is there a statistically significant relationship between hours of professional development and Section 504 coordinator efficacy?

Null Hypothesis

H₀: There is no statistically significant relationship between hours of training and Section 504 coordinator efficacy score.

Design of Study

This study utilized a correlational research design. This type of correlational design functions by collecting data to determine whether and to what degree a relationship exists between two or more variables. A Pearson correlation was conducted, thus generating a correlation coefficient. The degree of the potential relationship is expressed in the form of a correlation coefficient.

Instrumentation

A survey instrument was designed to measure previous professional development experiences and comfort levels of Section 504 coordinators in Missouri school districts. In survey research, the investigator selected a sample of respondents from a larger population and administered a questionnaire to collect information on variables of interests (McMillian & Schumacher, 2006). Surveys are used to learn about people's beliefs, attitudes, demographics, behavior, opinions, habits, desires, ideas, and other types of information. They are often used frequently in business, politics, government, sociology, public health, psychology, and education because accurate information can be obtained from large numbers of people with a small sample (McMillian & Schumacher, 2006). Most surveys describe the incidence, frequency, and distribution of the characteristics of an identified population. In addition to being descriptive, surveys can also be used to explore relationships between variables, or in an explanatory way (McMillian & Schumacher, 2006).

Survey research is very popular in education, primarily for three reasons: versatility, efficiency, and generalizability (Schutt, 1996). Surveys are versatile because they can be used to investigate almost any problem or question. They are also popular because credible information from a large population can be collected at a relatively low cost. If the survey is distributed through the internet, it can cut back on time and money as long as response rate is good (McMillian & Schumacher, 2006).

Surveys are also efficient because data on many variables can be gathered without substantial increase in time or cost. Surveys are also popular because small samples can be selected from larger populations in ways that permit generalization to the population. In fact, surveys are often the only means of being able to obtain a representative description of traits, beliefs, attitudes, and other characteristics of the population. Surveys also allow for generalizability across the population in which subgroups or different contexts can be compared (McMillian & Schumacher, 2006). A cross-sectional survey is the preferred type of data collection procedure for this study because of its rapid turnaround in data collection of a wide-spread sample (Creswell, 2014).

The survey instrument used was divided into three parts: Section 504 professional development, Section 504 professional development needs, and Section 504 Coordinator demographics. The first part of the survey proposed questions related to previous Section 504 coordinator professional development. The second section asked respondents to identify their perceived level of efficacy from professional development specifically built around common themes related to Section 504. The final portion of the survey instrument addressed basic demographics of the participant. The survey had 26 items for coordinators to answer. Reliability and validity statistics were calculated for Part II of the survey.

Validity of Instrument

Reliability refers to the consistency of measurement – the extent to which the results are similar over different forms of the same instrument or occasions of data (McMillian & Schmacher, 2006). Validity is one of the strengths of research and is based on determining whether the findings are accurate from the standpoint of the researcher, the participant, or the readers of an account (Creswell & Miller, 2000). The goal of good research is to have measures or observations that are both reliable and valid. Rudner (1994) described several factors that can result in unreliable data. These factors are when:

- questions on instruments are ambiguous and unclear
- procedures of test administration vary and are not standardized
- participants are fatigued are nervous, misinterpret questions, or guess on tests

According to Mertens (2010), the researcher must acknowledge that the intended sample may differ from the obtained sample. Response rate is defined as the percentage of people who answer and return a given survey (Neuman, 2012). Several factors may influence the response rate of the survey. Nonresponse to surveys may affect the validity of the findings (Kano, Franke, Afifi, & Bourque, 2008).

In order to assure validity and reliability of the study instrument, a pilot test was performed. A pilot test helped determine that the individuals in the sample were capable of completing the survey and that they understood the questions (Creswell, 2005). Using a pilot process assisted in making sure the survey questions were clear and not ambiguous. The pilot process also assessed if the instrument's data recording procedures fit the research questions.

In order to pilot this instrument, 25 counselors from a mid-Missouri school district were asked to participate. The counselors in this school district were typically the Section 504

coordinator for their individual building or may share the responsibility of implementing the Section 504 coordination responsibilities with other counselors in their building. It is unknown how these participants acquired the position of Section 504 coordinator. Whether counselors volunteered for the position or were mandated as part of their job requirement is unclear. This may add to the validity of how the counselors answered questions in the study pilot.

To begin the pilot process, each counselor was sent an email with the same instructions and the same instrument that would be used in the real study. All 25 counselors accessed and completed the survey. This type of program pilot helps establish reliability and validity of the instrument (Creswell, 2014). Once the test pilot was completed, questions 7-19 had validity and reliability statistics performed. A reliability analysis was completed for internal consistency and reliability. After completing a Principal Component Analysis (PCA), Section Two of the survey instrument was found valid. The results showed that the questions in Section Two were measuring a single construct. The reliability statistics of Cronbach's alpha based on 13 standardized items was .933.

Sampling and Data Collection Procedures

This study was developed to include only current Section 504 coordinators in the state of Missouri. The Missouri Department of Elementary and Secondary Education website provided district contact information. With this information, the researcher contacted each Missouri school district to request email information for their 2018-2019 Section 504 coordinator. The target population for this study was 551 Missouri Section 504 coordinators. The sample frame for this study was the responses received from each district's Section 504 coordinator. To maximize response rate, the study was sent out in two waves of emails. Following the principles established by Dillman, Smyth, and Christian (2014) to reduce coverage, sampling,

measurement, and nonresponse errors in survey research, there were at least two contacts made. The first wave was sent out on March 4, 2019, and it was due by March 15, 2019. If no response was reported, the district was sent a second attempt email notice and survey. The second wave of emails was sent out March 18, 2019, and was due March 29, 2019.

Participants were assured of the confidentiality of their answers and the voluntary nature of their participation through a letter of consent. All items on the survey were based upon a review of existing literature related to Section 504 and the research questions. The instrument was developed as a web based, e-mail survey using Question Pro software. Each school district was coded within the system to secure respondent ambiguity. An email describing the nature and purpose of the study survey was sent concurrently with the survey for each wave. Of the 551 Missouri Section 504 coordinators contacted, 104 coordinators participated in this study, giving a response rate of 19%.

Statistical Analysis

Once collected, the data information obtained was analyzed using descriptive statistics and bivariate correlation known as the Pearson's r . The researcher examined the demographic information (age, gender, geography) among Missouri's Section 504 coordinators. Because the variables of this research were either nominal or ordinal, frequencies were used in the data analysis (Creswell, 2005). Table 5 describes those variables measured by frequency analysis.

Table 5

Variables Measure by Frequency Analysis

Variable A	Variable B
Years in Education	Comfort Level of the 504 process
Geographical Location	Comfort Level of the 504 process
Years in Education	Comfort Level of the 504 process
Certification	Comfort Level of the 504 process
Current Titles/Positions	Comfort Level of the 504 process
Hours of Training	Comfort Level of the 504 process

In order to answer the research questions, a correlation coefficient was produced.

According to Gay and Airasian (2003), a correlation coefficient is a decimal number ranging from positive 1.00 to 0.00 to -1.00. They further state that a coefficient near positive 1.00 has a high size and a positive direction. In essence, this is a strong relationship in which both variables increased or decreased together. As for negative relationships, Gay and Airasian (2003) found that when one variable increases, the other decreases. The closer the correlation coefficient is to 0.00, the weaker the perceived relationship. The basic statistical analysis procedure used to produce the correlation coefficient will be the Pearson's Product-Moment Correlation Coefficient (Pearson's r). This was used to obtain an observed significance level, or p -value (Alpha = .05), between the time spent in professional development and the efficacy of fulfilling Section 504 responsibilities. By using Pearson's r to establish correlation these assumptions have been met for the scores on the variables:

- Are quantitative
- Linearly related
- Have a bivariate normal distribution
- Have no extreme outliers

- Scores on A have the same variances across levels of B (and vice versa)

Once a p -value was calculated based on survey results, the null hypothesis could be accepted or rejected.

Chapter Summary

Chapter Three focused on the methodology of the study. This includes a review of the research questions and null hypothesis, research design, population, sampling procedures, instrumentation, data collection procedures, and statistical analysis. For this study, survey research was used to focus on exploring relationships between the amount of professional development and job efficacy for Section 504 coordinators to improve this process. Additional knowledge uncovered by survey research, such as demographics, behavior, opinions, habits, desires, ideas, and other types of information will help shape educational policy and initiatives to improve existing Section 504 policies and professional development (Gall, Gall, & Borg, 2003).

In Chapter Four, the data results from this study were analyzed. A summary of the entire study will be given in Chapter Five. Implications and recommendations for future study in this area will also be discussed and will conclude Chapter Five.

CHAPTER FOUR

RESULTS

Introduction

The purpose of this study was to examine the relationship between Section 504 professional development and the efficacy of Section 504 coordinators in carrying out the responsibilities associated within the position. The second purpose of this study was to determine whether demographic variables such as age, gender, and teacher experience showed any significant correlations in Section 504 efficacy and professional development. This chapter will provide an overall analysis of the research findings.

Research Questions

The following questions guided the overall direction of this study:

1. What are the common demographics of 504 coordinators in Missouri?
2. Is there a statistically significant relationship between hours of professional development and Section 504 coordinator efficacy?

The null hypothesis for this study:

H₀: There is no statistically significant relationship between hours of training and Section 504 coordinator efficacy score.

The data were obtained and analyzed using descriptive statistics. A bivariate correlation known as the Pearson's r was used to analyze the data. An analysis of the demographic information (age, gender, and years in education) among Missouri's Section 504 coordinators was also completed to find any overarching themes or relationships. Frequencies among the data such as geographic location and amount of educational certifications of Section 504 coordinators

were also considered. Frequencies and proportions were used as a secondary analysis for this study. The demographics, data analysis, and findings are discussed in the sections that follow.

Demographics

The data collection phase of this study involved gathering the following information from each Section 504 coordinator in Missouri: (a) gender, (b) district by location (urban, rural, suburban), (c) current role, (d) type of coordinator, (e) educational certification, (f) previous Section 504 training, (g) current 504 training, (h) type of previous 504 training, (i) efficacy in each Section 504 process areas. The data were collected through disseminating a 26 question survey. All data were received electronically using Question Pro, a data collection/survey web site. The Missouri Department of Elementary and Secondary Education reported Missouri has 551 public school districts. Invitations to participants were electronically sent to all 551 districts. From the 551 invitations sent, 104 responses were received for a total approximate response rate of 19%. The study produced a sample of 104 Section 504 coordinators ($n=104$), comprised of 95 females (91.65%) and nine males (8.65%). When surveyed about their district, coordinators stated 83.65% of their districts were rural, 11.54% were described as suburban, and 4.81% described their districts as urban. Table 6 describes how current Section 504 coordinators identified their role or position within their district.

Table 6

Current Roles of Missouri Section 504 Coordinators

Current Roles	Count	Percent
Section 504 Coordinator	61	28.77%
Special Education Director	51	24.06%
Other	29	13.68%
Process Coordinator	22	10.38%
Guidance/Counselor	14	6.60%
Principal	11	5.19%
Special Education Teacher	9	4.25%
Superintendent	6	2.83%
Assistant Principal	5	2.36%
Assistant Superintendent	2	0.94%
Instructional Coach	2	0.94%
Nurse	0	0.00%
Regular Education Teacher	0	0.00%

Table 6 indicates how study participants identified their current position. While 28.77% of participants indicated “Section 504 Coordinator” as a current position, 24.06% of participants identified the “Special Education Director” as a current position. Of the positions identified, 38.69% were in the field of special education (Special Education Teacher, Process Coordinator, and Special Education Director).

Participants were also asked in what capacity they served their district as a Section 504 coordinator. In Missouri public schools, Section 504 coordinators can serve at the building or district level. If the district is small, the coordinator may be both the building and district coordinator. Table 7 indicates the percentages of coordinators who were only district Section 504 coordinators, only building Section 504 coordinators, or who served as both the building and district Section 504 coordinator. Of the coordinators surveyed, 57.69% responded they only serve as district coordinators, 7.69% indicated that they serve as a building coordinator and 34.62% indicated they serve as both the district and building Section 504 coordinator.

Table 7

Section 504 Coordinator Positions and Number of Participants

Position	Number of Participants	Percentage
Building Coordinator	8	7.69
District Coordinator	60	57.69
Building/District Coordinator	36	34.62

In public schools, all certified personnel must have at least one educational certification in education or education administration in order to practice as an educator in Missouri. Of the coordinators surveyed, 17.46% of coordinators have special education K-12 certifications. This certification area was identified with the largest percentage. Coordinators with elementary teaching certifications were identified at 15.34%. This certification was the second largest percentage identified. Survey participants with elementary teaching certification were identified at 12.17%, the third largest percentage identified. School guidance certification and other unidentified areas of certification were the least identified in this study. Table 8 identifies the areas of certification held by the Section 504 coordinators surveyed.

Table 8

Education Certifications of Missouri Section 504 Coordinators

Area of Certification	Count	Percentage
Special Education K-12	66	17.46%
Elementary	58	15.34%
Elementary Principal	46	12.17%
Special Education Admin	43	11.38%
Middle School	35	9.26%
Middle School Principal	31	8.20%
High School Principal	30	7.94%
Superintendent	22	5.82%
High School	20	5.29%
School Guidance/Counseling	14	3.70%
Other	13	3.44%

Although these demographic questions were not the primary reason for the study, the answers to these questions gave meaningful insight for further discussion. Chapter Five will discuss these findings and implications further. To further understand the relationship between Section 504 job efficacy and hours of professional development, an analysis of the data from this study must occur.

Data Analysis and Findings

The following null hypothesis was tested:

H₀: There is no statistically significant relationship between hours of training and Section 504 coordinator efficacy score.

A Pearson's product-moment correlation was run to assess the relationship between Section 504 professional development hours and job efficacy (as related to the 13 key topics as related to the Section 504 process) in Missouri public school systems. Typically, a Pearson's *r* Correlation is used to determine if a correlation exists if there are two continuous level variables. The variables, as assessed by Shapiro-Wilk's test ($p > .05$), were not normally distributed because their values are less than .05. Even though the data were normally distributed, Pearson's *r* is robust enough to handle non-normal distributions. Since the other assumptions were met, data analysis continued forward. The assumption that each variable is continuous was met. The assumption that each set of variables is paired was met, as well as having a linear relationship between each set of variables. There were no significant outliers. Overall, there was no statistically significant correlation between Section 504 professional development hours and job efficacy in the 13 key topics related to the Section 504.

Although there was not a statistically significant correlation, the sections of "Understanding Disciplinary Practices" and "Understanding the Definition of Section 504" are

more likely than any section of job efficacy tested to be correlated to “Number of Professional Development Hours”. Table 9 indicates the following Pearson’s correlation coefficient for each of the 13 areas equating to job efficacy.

Table 9

Pearson’s Correlation Coefficient for Areas Equating to Section 504 Training Hours

Sections of Job Efficacy	Pearson’s Correlation Coefficient		Percentage of Variation
	<i>r</i>	<i>p</i>	
Q7: Definition of 504	.137	.166	1.90
Q8: IDEA vs. 504	.010	.918	0.01
Q9: Child Find Obligations	-.027	.788	0.07
Q10: Referral Process	.120	.226	1.40
Q11: Evaluation Process	-.002	.983	0.0004
Q12: 504 Eligibility Process	-.039	.692	0.15
Q13: Creating 504 Plans	.095	.335	0.90
Q14: Implementing Plans	-.019	.852	0.04
Q15: 504 Data Collection	.023	.817	0.05
Q16: Procedural Safeguards	-.016	.872	0.02
Q17: Disciplinary Practices	-.184	.062	3.30
Q18: Grievance Process	-.053	.595	0.28
Q19: Court Case Implication	-.092	.354	0.84

Additional relationships can also be found by analyzing the Correlation Matrix. The Correlation Matrix (Appendix C) displays if any correlation exists between the variables to themselves. This data identifies a strong correlation (70%) that the participants who answered Question 7 (Understanding the Definition of Section 504) also answered Question 8 (Understanding the Difference between Section 504 and ADA) in the same manner. A slightly lower correlation also exists between Question 10 (Understanding the Referral Process) and Question 11 (Understanding the Evaluation Process) of 68% and Question 11 (Understanding the Evaluation Process) to Question 12 (Understanding the Eligibility Process) of 64%. Note that

these correlations do not involve the variable of “Hours of Professional Development”; they only show that a moderate correlation exists between the variables to themselves. Even though no statistically significant correlations existed between the amount of professional development hours and job efficacy of Section 504 coordinators, other vital information was generated as to how much and to what extent Section 504 coordinators attended professional development.

Table 10 represents the number of coordinators who received training prior to assuming the role of Section 504 coordinator for their building/district. In over half of all cases, Section 504 coordinators assumed the role of coordinator with no prior training.

Table 10

Participant Answers to Question 1: Did you receive Section 504 training/professional development before you assumed the role of Section 504 coordinator for you building/district?

Answer	Count	Percent
Yes	41	39.42
No	63	60.58
Total	104	100.00

In the area of ongoing professional development, participants were asked if they received ongoing Section 504 professional development for their building or district. This question was answered by both Section 504 building coordinators and Section 504 district coordinators.

Participants’ answers to this question are identified in Table 11.

Table 11

Participant Answers to Question 2: Do you currently receive ongoing professional development for coordinating Section 504 responsibilities for your building or district?

Answer	Count	Percent
Yes	46	44.23
No	58	55.77

As the table shows, only 44.23% of all participants responded that they receive ongoing professional development for their district. This question was also answered by Section 504 building coordinators. Over half of the participants (55.77%) responded they do not receive ongoing professional development.

Participants had the opportunity to expand on previous or ongoing Section 504 training. This question was developed to address both previous and future Section 504 training for the 2018-2019 school year. Table 12 represents the number of hours of training Section 504 coordinators have or would attend for the 2018-2019 school year.

Table 12

Participant Answers to Question 3: How many hours of Section 504 training have/will you attend for the 2018-2019 school year?

Hours	Count	Percent
0	37	35.58
1-5	49	47.12
6-10	11	10.58
11-15	2	01.92
16+	1	00.96
Unsure	4	03.85

In addition to reporting the number of professional development hours, participants were also asked if the amount of time spent in professional development was sufficient to fulfill their job responsibilities as a Section 504 coordinator. Question 4 asked participants if they could effectively fulfill their obligations as a coordinator with their current amount of professional development. Table 13 shows participants' responses.

Table 13

Participant Answers to Question 4: The amount of time spent in Section 504 professional development is sufficient for me to effectively fulfill my responsibilities.

Answer	Count	Percent
Strongly Agree	6	05.77
Agree	27	25.96
Undecided	20	19.23
Disagree	38	36.54
Strongly Disagree	13	12.50

When the responses of “strongly agree” and “agree” are combined, 31.73% of participants agreed that the amount of time spent in Section 504 coordinator professional development was adequate to effectively fulfill their responsibilities as a 504 coordinator. When the responses of “disagreed” and “strongly disagreed” were combined, 49.04% responded that they did not feel they received enough professional development to fulfill their Section 504 responsibilities. However, over 10% were undecided if they received enough professional development to fulfill their responsibilities as a Section 504 coordinator.

Statistical Conclusion

The analyses of data in this study failed to reject the null hypothesis that the relationship between hours of training and Section 504 coordinator efficacy scores was not statistically significant. However, a strong correlation between several variables was discovered. The top two variables that showed the most statistical significance “Understanding Disciplinary Practices” and “Understanding the Referral Process” were identified. Additionally, vital information was generated as to how much and to what extent Section 504 coordinators attended professional development.

Although the null hypothesis was not rejected supporting no statistically significant relationship between job efficacy and amount of professional development, the examination of additional raw data provided by this study proved to identify several key factors for future Section 504 professional development implications. Further interpretation of this data and additional suggestions for practice will be examined in Chapter Five.

CHAPTER FIVE

CONCLUSIONS AND RECOMMENDATIONS

Introduction

Section 504 of the Rehabilitation Act of 1973 is of paramount importance to the disabled in educational settings. The protections guaranteed by Section 504 prohibit discrimination on the basis of disability (Madaus, Shaw and Zhao, 2005). These great equalizers are predicated on the social equity theory that all American citizens are equal and should receive a decent education, despite their position in life (Jedicke, 1997). Although Section 504 does not guarantee progress in the educational environment, it does mandate educators to provide equal educational opportunities to those students identified as disabled under Section 504 standards.

The problem addressed in this study revolves around the challenges of developing and implementing proper Section 504 coordinator professional development and responding appropriately to the challenges 504 coordinators will face in providing a free, appropriate public education. The theoretical framework of this study is the ideals associated with social equity practices. These practices are gleaned from the comprehensive review of the literature pertaining to the historical battle persons with disabilities faced in securing equal opportunities for all in education. The following questions guided the overall direction of this study:

1. What are the common demographics of 504 coordinators in Missouri?
2. Is there a statistically significant relationship between hours of professional development and Section 504 coordinator efficacy?

The following null hypothesis was tested:

H₀: There is no statistically significant relationship between hours of training and Section 504 coordinator efficacy score.

The two research questions guiding this study were fully addressed through the collection and analysis of the descriptive data. In the first question concerning demographics of Section 504, the data revealed that each district is unique in its policies and procedures when employing Section 504 coordinators as identified by the researcher from the literature. The results from the second guiding question revealed that the amount of professional development is not statistically significant in the efficacy of Section 504 coordinators in delivering special education to students in need. Therefore, this study failed to reject the null hypothesis ($H_0: p \geq 0.5$) in all of the 13 areas reported by Section 504 coordinators. The results and analysis from this section are discussed immediately following the results of demographics. In this concluding chapter, a summary of the findings from this study will be analyzed to ascertain if the results confirm or disagree with current Section 504 literature and practices. Limitations of the study will also be discussed, as well as professional implications. Finally, recommendations for future research in the area of Section 504 and professional development will be discussed.

Summary of Findings

The problem addressed in this study stems from the challenges of developing and implementing proper Section 504 coordinator professional development and responding appropriately to the challenges 504 coordinators will face if they do not receive appropriate training. Previous research concludes that Section 504 plans are coordinated by a broad array of school personnel. According to Richards (1994) the Section 504 coordinator should be responsible to develop and maintain a Section 504 program, distribute the necessary documentation and information to all campuses, and oversee the progress of all Section 504 committees. Additionally, Section 504 coordinators should provide training to school personnel who are involved in the process of designing and implementing individual accommodation plans

for students (Richards, 1994). Without this type of leadership, district personnel may be lacking in their understanding of Section 504.

A comprehensive review of the literature identified key processes Section 504 coordinators must manage in order to understand and correctly coordinate special services for children with disabilities. The themes that emerged from this study all pertain to effectively fulfilling a universal intention related to the theoretical framework of social equity in delivering services to the least fortunate citizens: children with disabilities. A Pearson correlation was conducted, thus generating a correlation coefficient. Data analysis and conclusions were reached by comparing the relevant literature and data gained from the coordinator surveys. The conclusions pertaining to each theme are presented in this section and are reported according to the key processes identified in the literature.

RQ1 and demographics. The demographic findings from this study support the notion that school districts continue to appoint a variety of school personnel to fulfill the role of Section 504 coordinator (Katysiyannis & Conderman, 1994; Madaus & Shaw, 2008). Typically, the studies and research related to Section 504 demographics are older in nature. However, the findings of this study are consistent with the findings of these other studies addressing demographics of Section 504 coordinators. The data also identified common frequencies related to the amount, type, and consistency of professional development received by Section 504 coordinators.

Previous research (Russo & Osbourne, 2009; Letter to McKethan, 2012; Shaw & Madaus, 2008) and research findings from this study indicate that Section 504 coordinators have unique and diverse backgrounds leading up to their present position of carrying out 504 responsibilities for their district. Previous data from Maduas and Shaw (2006b) and Madaus,

Shaw, and Zhao (2005) and this study report that two thirds of Section 504 coordinators have some sort of special education background and training.

When functioning as an effective Section 504 coordinator, previous and ongoing professional development will assist in effectively identifying and providing services to students with disabilities (Madaus & Shaw, 2006a). Previous research from Shaw and Maduas (2008) evoked a similar question about sufficient training in this study. When asked if coordinators of Section 504 services had sufficient knowledge to carry out their responsibilities, 23% of the coordinators surveyed in the Shaw and Madaus study stated they had sufficient knowledge (Madaus & Shaw, 2008). In this study, when Missouri participants were asked if the amount of time spent in professional development was sufficient enough to effectively fulfill their responsibilities, 49% of coordinators stated that the amount of time spent in professional development was sufficient to effectively fulfill their responsibilities.

A review of the literature (Madaus & Shaw, 2006a) shows similar results when examining pre-service Section 504 training. In the study by Madaus and Shaw, 574 school based professionals were surveyed about their preservice training for Section 504. Over two thirds (69%) of the participants reported having no training related to Section 504. Similarly in this study, 61% of the coordinators surveyed indicated they had no training before assuming the role of Section 504 coordinator.

The results from this study and a comprehensive review of the literature indicate Section 504 can be difficult to navigate under the best circumstances. The scope of Section 504's coverage poses significant challenges to educators. "Not only do you need to know about the range of services available to eligible students, but you must be aware of requirements governing facility accessibility, child find, discipline and much, much more" (Norlin & Slater, 2012, p. 6).

RQ2 and themes of job efficacy. The following section will discuss in detail the conclusions found in this study as they relate to the 13 themes identified in the review of literature. Frequencies found in the 13 themes will first be discussed, followed by the statistical data interpretation from the Pearson product-moment correlation coefficient. The Pearson product-moment correlation coefficient is a measure of the strength of a linear association between two variables. In this study, the variables are identified as professional development hours and job efficacy. A Pearson product-moment correlation attempts to draw a line of best fit through the data of two variables, and the Pearson correlation coefficient, r , indicates how far away all these data points are to this line of best fit (i.e., how well the data points fit this new model/line of best fit). The Pearson correlation coefficient, r , can take a range of values from +1 to -1. A value of 0 indicates that there is no association between the two variables. A value greater than 0 indicates a positive association; that is, as the value of one variable increases, so does the value of the other variable. A value less than 0 indicates a negative association; that is, as the value of one variable increases, the value of the other variable decreases. The stronger the association of the two variables, the closer the Pearson correlation coefficient, r , will be to either +1 or -1 depending on whether the relationship is positive or negative, respectively. Achieving a value of +1 or -1 means that the data points are included on the line of best fit – there are no data points that show any variation away from this line. Values for r between +1 and -1 (for example, $r = 0.8$ or -0.4) indicate that there is variation around the line of best fit. The closer the value of r to 0 the greater the variation around the line of best fit. The following results will independently look at each theme as correlated to previous results of this survey and the Pearson product correlation coefficient.

Definition and differences of IDEA and Section 504. Previous research (McCarthy, 1988; Guernsey, 1989; Katsiyannis & Conderman, 1994; Zirkel, 2019) and research findings from this study state that several important distinctions exist between Section 504 and the Individuals with Disabilities Education Act (IDEA) that may be hard to navigate to the novice educator. In this study, 62% of all coordinators surveyed stated that they understood the definition of Section 504. In understanding the difference between IDEA and Section 504, 81% of the participants agreed or strongly agreed that understanding this part of the 504 process was a strength for them. Once educational leaders understand these definitions, the sooner they can begin to share that information with their staffing teams who may be struggling with which process to utilize and when. Successful Section 504 coordinators establish policies and practices that articulate a district's vision that focuses on student learning and achievement. These findings confirm current Section 504 literature and practice.

Pearson's r results for Q7: Definition of 504. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding definitions of Section 504 (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, positive correlation between the two variables, $r = .137$, $n = 104$, $p = 0.166$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding definitions of Section 504. Therefore, this facet of this study failed to reject the null hypothesis ($H_0: 0.166 \geq 0.05$) in the area of "Definition of 504" as reported by Section 504 coordinators. Because the p value is greater than .05, the

correlation between hours of professional development and the understanding of the definition of 504 are not statistically significant.

The definition of Section 504 and ADA continue to be two very important factors when determining eligibility under either category. A Section 504 coordinator must be well versed in these definitions to lead compliant Section 504 teams (Shaw & Madaus, 2008). The three criteria used to determine eligibility for Section 504 services and preventions are (a) physical or mental impairment, (b) major life activity, and, directly connecting the first two criteria, (c) substantial. Unlike IDEA eligibility, the impairments are not limited to a relatively small set of specified classifications; the affected activities are not limited to academic areas, and the ultimate essential is not the need for special education (Zirkel, 2019). The definition of disability under IDEA is very different and will be discussed in the next theme comparing IDEA and Section 504.

Pearson's r results for Q8: IDEA and 504. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the difference between IDEA and Section 504 (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, positive correlation between the two variables, $r = .010$, $n = 104$, $p = 0.918$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the difference between IDEA and Section 504. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.918 \geq 0.05$) in the area of "IDEA and 504" as reported by Section 504 coordinators. Because the p value is greater than .05, the correlation between hours of professional development and understanding the difference between IDEA and Section 504 are not statistically significant.

In order to be found eligible for special education services and protections under IDEA, a student must meet the requirements of having a disability and have a need for special education services. Section 504's definition is very different in that it offers a broader category for which students can qualify. Eligibility for protections and services under Section 504 is based on the definition of disability and is not the same as eligibility under IDEA. Key points to remember when determining eligibility under 504 include the following: (a) Eligibility is based on the definition of disability; (b) Eligibility is not age restricted (as with IDEA) as it covers individuals from birth to death; (c) Eligibility is not related to specific categories of disabilities (as with IDEA); (d) Eligibility is based on the functional impact of a physical or mental impairment, not just the need for special education (Smith, 2002).

Child find. Child find obligations are one such mandate that must be carried through in order for districts to identify all children with disabilities in their attendance areas. Previous research (Ennis, Blanton, & Katsiyannis, 2017) indicates Section 504 coordinators must remain vigilant in identifying students who may require special services within their communities. In this study, 58% of all coordinators surveyed stated that understanding the definition of Section 504 was a strength for them in the 504 process. Proper child find processes are in place to ensure that all children have access to the services and programs offered by school districts. School districts are likely to be found in violation of child find activities when school officials overlook signs of a disability, fail to evaluate, or have no justification for deciding not to evaluate. When disabled students go unrecognized and unserved, the entire vision of the district is compromised. When school districts are actively engaged in child find processes, the end results will be a free and appropriate public education for all students.

Pearson's r results for Q9: Child Find obligations. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding Child Find obligations (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, negative correlation between the two variables, $r = -.027$, $n = 104$, $p = 0.788$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding Child Find obligations. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.788 \geq 0.05$) in the area of "child find" as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours of professional development and the understanding child find obligations are not statistically significant.

The requirement of Child Find obligations is one of the few commonalities that occur between Section 504 and IDEA. As with IDEA, Section 504 requires that public schools conduct thorough child find activities (i.e., newspaper announcements, website announcements, local radio announcements) in order to provide a free, appropriate public education (FAPE; Turnbull & Turnbull, 2001). Failure to understand and follow through with this important responsibility of Section 504 can cause districts to be out of compliance with the Office of Civil Rights.

Referral process. A review of the literature affirms that schools are required to refer students who they think would be eligible for Section 504 services (Smith, 2002; Wenkart, 2000). Section 504 coordinators must respond to referrals in a timely manner or risk being out of compliance with their 504 procedures. In this study, 70% of all coordinators surveyed stated that understanding the referral process was a strength for them. Previous research (Ennis et al., 2017)

indicates that referrals handled in a timely manner can provide students with the level of support they so desperately need to be successful. It is the Section 504 coordinator's responsibility to know when an analysis of student data triggers a referral. This key content information on the referral process needs to be taught and reviewed to all student instructional teams.

Pearson's r results for Q10: Referral Process. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the referral process (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, positive correlation between the two variables, $r = .120$, $n = 104$, $p = 0.226$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the referral process. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.226 \geq 0.05$) in the area of "IDEA and 504" as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours of professional development and the understanding the referral process are not statistically significant.

Coordinating referrals for Section 504 can be one of the more difficult skills Section 504 coordinators encounter. Teachers and parents make most of the referrals for 504 interventions (Fossey, R., Hosie, T., Soniat, K., & Zirkel, P., 1995). However, anyone can refer a child for evaluation under Section 504. Therefore, a school district does not have to refer or evaluate a child under Section 504 solely upon parental demand. The key to a referral is whether the school district staff suspects that the child is suffering from a mental or physical impairment that substantially limits a major life activity and is in need of either regular education with

supplementary services or special education and related services (Letter to Mentink, 1993). If a parent requests a referral for evaluation, and the school district refuses, the school district must provide the parent with notice of their procedural rights under Section 504 (Zirkel, 2003). Again, the fulfillment of these duties should be coordinated by someone who understands Section 504 processes. Denying referrals can also be a difficult aspect of Section 504. Section 504 coordinators must be able to overcome adversity and bridge relationships between parents while still being responsible for preserving district resources (Smith, 2002).

Evaluation and eligibility process. In 2002, Smith states evaluation and eligibility for protections and services under Section 504 is not the same as the Individuals with Disabilities Education Act (IDEA). Although the evaluation process for Section 504 may mirror IDEA, there are key differences that Section 504 coordinators must discern. In this study, 58% of all coordinators surveyed stated that understanding the evaluation process of Section 504 was a strength for them. Similarly, 59% of all coordinators surveyed stated that understanding the eligibility process of Section 504 was a strength for them. Once evaluation and eligibility procedures are followed, a student can begin to receive services and accommodations immediately should all parties agree. Prompt evaluations and eligibility meetings can ensure that all students with disabilities have their specific needs met. These findings confirm current Section 504 literature and practice.

Pearson's r results for Q11: Evaluation process. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the evaluation process (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, negative

correlation between the two variables, $r = -.002$, $n = 104$, $p = 0.983$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the evaluation process. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.983 \geq 0.05$) in the area of “Evaluation process” as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours of professional development and the understanding of the evaluation process are not statistically significant.

Pearson’s r results for Q12: 504 eligibility process. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the 504 eligibility process (as measured by the Pearson’s r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, negative correlation between the two variables, $r = -.039$, $n = 104$, $p = 0.692$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the 504 eligibility process. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.692 \geq 0.05$) in the area of “Understanding Eligibility” as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours of professional development and the understanding the eligibility process are not statistically significant.

The process of determining a child’s eligibility for services is one of the most difficult aspects of leading a 504 team. School personnel must remember that the decision is based on their professional judgment about the child's functioning. Test scores, numerical indices, and discrepancy formulas should not be used as the primary determining factors. Although

physicians and other health professionals may make various diagnoses, school personnel make the eligibility determination. Parents can always contest the decision through due process hearings, but the determination regarding eligibility rests with the school (Smith, 2001).

Development, implementation, and data analysis of 504 plans. In 1994, Katsiyannis and Conderman anticipated that states would provide leadership in developing Section 504 guidelines that focus on Section 504 planning. Previous research (Madaus & Shaw, 2006a) and this study show that this is not the case. In the previous study, many respondents reported that their districts did not provide training on Section 504 planning or even distribute Section 504 procedures to staff. In this study, 50% of the respondents agreed that writing a 504 plan was a strength. When asked about implementing a 504 plan, 69% agreed that process was a strength for them. In understanding how to effectively collect and analyze Section 504 data, only 30% of the Missouri respondents reported this to be a strength. The development and implementation of Section 504 plans are the heart of the 504 process. Successful student instructional teams develop and implement the Section 504 plans, as well as record and analyze data on the progress of those plans. Systematic reviews of Section 504 plans and data tracking activities can assist student instructional teams in providing and modifying Section 504 plans as the student progresses throughout the year.

Pearson's r results for Q13: Creating 504 plans. The relationship between hours of professional development among Section 504 coordinators and the efficacy with creating Section 504 plans (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, positive correlation between the two variables, $r = .095$, $n = 104$, $p = 0.335$, which indicates no

significant relationship between hours of professional development among Section 504 coordinators and the efficacy with creating Section 504 plans. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.335 \geq 0.05$) in the area of “Creating 504 plans” as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours of professional development and the understanding how to create 504 plans are not statistically significant.

After a child has been determined to be eligible for Section 504 services and protections, an individual plan must be developed. Unlike IDEA, schools do not have to develop Individualized Education Programs (IEPs) for students served under Section 504. However, they do have to develop individual services and accommodation plans for students under Section 504. (Smith, 2002).

Pearson's r results for Q14: Implementing Section 504 plans. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding how to implement a Section 504 plans (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, negative correlation between the two variables, $r = -.019$, $n = 104$, $p = 0.852$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding how to implement a Section 504 plan. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.852 \geq 0.05$) in the area of “Implementing Section 504 plans” as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours

of professional development and the understanding how to implement Section 504 plans are not statistically significant.

Section 504 does not specify the contents of the plan, but the plan must be designed to meet the needs of individual students, including specific accommodations and modifications that are necessary to meet the requirements of FAPE (Smith, 2002). This part of the process is usually done by the process coordinator or administrator, as it deals with assigning personnel responsibilities to effectively implement the 504 plan (Zirkel, 2019).

Pearson's r results for Q15: 504 data collection. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding how to collect data for 504 plans (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were preformed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, positive correlation between the two variables, $r = .023$, $n = 104$, $p = 0.817$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding how to collect data for 504 plans. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.817 \geq 0.05$) in the area of "504 data collection" as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours of professional development and the understanding of 504 data collection are not statistically significant. Again, this part of the process is difficult to navigate even for the most seasoned Section 504 coordinator because it can involve assigning responsibilities to district personnel to collect data and keep 504 plans current.

Procedural Safeguards. Previous research (Smith, 2002; Norlin, 2011; Allen & Galli, 2001) states schools must provide procedural safeguards for children and their families, such as

the right to notice and the right to a due process hearing. In this study, 63% of all coordinators surveyed stated that understanding procedural safeguards of Section 504 was a strength for them. Of the Missouri coordinators surveyed, 19% were undecided if they understood the intricacies of procedural safeguards.

Pearson's r results for Q16: Procedural safeguards. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding 504 procedural safeguards (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, negative correlation between the two variables, $r = -.016$, $n = 104$, $p = 0.872$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding 504 procedural safeguards. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.872 \geq 0.05$) in the area of "Procedural safeguards" as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours of professional development and the understanding procedural safeguards are not statistically significant. A novice Section 504 coordinator who has not been provided professional development in this area may not be aware of this legal right, thus placing the district at risk of noncompliance. Students and their families are also at risk of not knowing their procedural rights if Section 504 coordinators do not present them with this information.

Disciplinary Practices. A review of the literature and this statement from the Office of Civil Rights explains that a school district cannot discipline a student with a disability for behavior that is a manifestation of his disability if the disciplinary action is a significant change in placement. According to the Office of Civil Rights (OCR), whenever a suspension constitutes

a "significant change of placement," a student with disabilities under Section 504 must be evaluated by the multidisciplinary team to determine whether the misconduct is related to the child's disability. In this study, 43% of all coordinators surveyed stated that understanding how to develop and implement disciplinary practices for students who receive Section 504 services was a strength for them. In addition, 25% of participants were undecided if Section 504 disciplinary procedures were a strength for them. Zirkel (2008) best describes this scenario as a "high stakes" administrative activity only to be taken on by the most seasoned Section 504 coordinator or administrator immersed in Section 504 policy. When Section 504 coordinators are unfamiliar about disciplinary practices for students with disabilities, they place their students at risk of being denied their procedural rights to due process. The denial of this right could result in the student being denied services that he/she is entitled to under the law.

Pearson's r results for Q17: Disciplinary Practices. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding effective disciplinary practices (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, negative correlation between the two variables, $r = -.184$, $n = 104$, $p = 0.062$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding effective disciplinary practices. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.062 \geq 0.05$) in the area of "Disciplinary Practices" as reported by Section 504 coordinators. However, this p value would fall into the "marginally significant" range because $.062 \leq .10$ according to p value guidelines. Because the r value results in a negative number, this coefficient, a negative correlation exists.

Negative correlation implies that a relationship between two variables move in opposite directions. If variables X (hours of professional development) and Y (job efficacy) are negatively correlated, as X (hours of professional development) increases in value, Y (job efficacy) will decrease; similarly, if X decreases in value, Y will increase. The degree to which one variable moves in relation to the other is measured by the correlation coefficient, which quantifies the strength of the correlation between two variables. If variables X and Y have a correlation coefficient of -0.1, they have a weak negative correlation, but if they have a correlation coefficient of -0.9, they would be regarded as having a strong negative correlation. The higher the negative correlation between two variables, the closer the correlation coefficient will be to the value -1. Therefore, this study concludes that when the hours of professional development increase, the level of job efficacy decreases and vice versa (McMillan & Schumacher, 2006).

The area of “disciplinary practices” is the most statistically significant theme found in this study. This would seem to validate the information found in the literature review (Crockett, 2002; Madaus & Shaw, 2006a; Shaw & Madaus, 2008) that many administrators struggle with the legalities of Section 504 and IDEA due to a lack of training. The school principal or assistant principal often serves as the school-based Section 504 coordinator and is also often involved in coordinating Section 504 discipline (Madaus & Shaw, 2006a). Crockett (2002) noted, however, that building administrators have limited professional training in the area of special education and limited knowledge in disciplinary practices of students with disabilities. Crockett also indicated that accreditation guidelines for building administrators do not include expectations of knowledge or skills to fulfill these responsibilities. Bays’s (2004) call for leadership preparation programs for future administrators to integrate “special education knowledge, skills, and

discipline across their curricula” (p. 52) would go a long way toward preparing principals for their critical role as leaders for Section 504 implementation in the schools.

Grievance Process. In the review of literature Zirkel (2012) states that individuals served under Section 504 (along with their parents) have a high rate of legal success due to inadequate or missing grievance procedures in school districts. In this study, only 33% of all 504 coordinators surveyed stated that understanding the grievance process for Section 504 was a strength for them. As part of a student’s procedural rights, districts must have grievance procedures in place to assist students who believe their rights are being wrongly implemented or denied. The required grievance procedures do not need to be complicated or impartial. The procedure just needs to incorporate ‘appropriate due process standards and be prompt and equitable (Zirkel, 2012). Section 504 coordinators need to stay vigilant and request a copy of Section 504 grievance procedures when assuming the position. Previous research (Zirkel, 2011, 2012) and the research findings from this study conclude the need for ongoing training opportunities of grievance procedures as it relates to the Section 504 process. These findings confirm current Section 504 literature and practice.

Pearson’s r results for Q18: Grievance Process. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the 504 grievance process (as measured by the Pearson’s *r*) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were preformed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, negative correlation between the two variables, $r = -.053$, $n = 104$, $p = 0 .595$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding the 504 grievance process. Therefore, this facet

of the study failed to reject the null hypothesis ($H_0: 0.595 \geq 0.05$) in the area of “Grievance Procedures” as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours of professional development and the understanding grievance procedures are not statistically significant.

The grievance process as it pertains to Section 504 is seldom taught in professional development in-services for one simple reason: it is last on the list. Typically, many of the participants in Section 504 professional development sessions have specific questions to scenarios they are experiencing in their district. The presenter innocently runs out of time answering these questions (usually associated with discipline, the second to last topic covered) and the topic of grievance procedures is never discussed. However, it could be one of the most important pieces of the 504 process (Zirkel, 2011).

Court cases, outcomes, and implications. Given that Section 504 is not a special education law, it would be appropriate if personnel were knowledgeable about major court cases and how they have shaped policy. Previous study of the literature (Katsiyannis & Conderman, 1994) suggests that a comprehensive and pervasive body of law and policy is increasingly affecting general and special education leaders and service providers. As these court cases continue to drive policy, Section 504 coordinators must find a way to review and ask questions surrounding educational litigation. In this study, 39% of coordinators surveyed stated court cases, outcomes and implications as one of their strengths. Previous research (Miller & Newbill, 2006; Blazer, 1999) and the research findings from this study conclude the need for ongoing training opportunities on the Section 504 process. Reid, Maag, Vasa, and Wright (1994) concurred that ongoing training opportunities are essential for Section 504 coordinators, particularly in the areas of law and student eligibility.

Pearson's r results for Q19: Court case implications. The relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding court case implications (as measured by the Pearson's r) was investigated using Pearson product moment correlation coefficient. Preliminary analyses were performed to ensure no violation of the assumptions of normality, linearity, and homoscedasticity. There was a small, negative correlation between the two variables, $r = -.092$, $n = 104$, $p = 0.354$, which indicates no significant relationship between hours of professional development among Section 504 coordinators and the efficacy with understanding court case implications. Therefore, this facet of the study failed to reject the null hypothesis ($H_0: 0.354 \geq 0.05$) in the area of "Court case implications" as reported by Section 504 coordinators. Because the p value is greater than .05, the correlations between hours of professional development and the understanding court case implications are not statistically significant.

Interpretation and understanding of mandates set forth by Section 504 continue to evolve in the field of education (Chiasson & Olson, 2007). As these mandates are challenged in courts of law, new interpretations of Section 504 are generated. These interpretations are generated as direct results of how Section 504 policy is handled by individual districts when dealing with students with disabilities.

Limitations of the Study

Limitations of this study include participant and researcher bias and the general scope of the study. In this study, participant bias was a limitation, because the resulting data relies on the truthfulness of the participants' responses. Each participant answered the survey questions based upon previous experience as a Section 504 coordinator. How the participant feels (either positive or negative) about the appointment of Section 504 coordinator is unknown, but may be a

limitation in this study. The researcher attempted to structure the survey in a manner that allowed participants to provide objective answers, particularly on the questions that identified efficacy where five scaled choices were given. This format of the survey may also be a limitation. In order to follow typical Likert scales, two agreeing answers were options (strongly agree/agree) as well as two disagreeing factors (disagree/strongly disagree). There was also an “Undecided” option within each question. The ability to answer “Undecided” is a strong limitation as it is neither for nor against a specific choice. It is a neutral choice that could have swayed the results of the study. This factor may also be a limitation. Some argue that such options like “Don’t know,” “Undecided,” or “No opinion” provides those who cannot put themselves into one of the offered categories a way to register an honest response (Converse & Presser, 1986). Without a non-substantive option, these respondents would rather select an untrue answer or skip the question, neither of which is a desirable outcome. Others argue that providing these response options makes it easier on the respondents to satisfice; that is, that the respondents will select the “Undecided” option rather than doing the mental work necessary to report their true responses (Krosnick, 2002).

Of the coordinators who participated, the uneven percentage in the type of districts who responded (83.65% of rural districts participated versus 11.54% of suburban districts and 4.81% of urban districts) is also a limitation. Researcher bias was a limitation of this study due to the fact that the researcher analyzed the data under the assumption that the participants would offer valuable insight concerning their strengths in the 13 Section 504 themes. The researcher is not a practicing Section 504 coordinator, and therefore analyzed and interpreted the data through personal experiences and knowledge.

Although the survey was limited to only thirteen Section 504 processes, a thorough review of the literature was conducted to identify research based processes and procedures. A gap in recent literature exists in this area due to Section 504 resources focusing on the central theme of policies and procedures of Section 504 and not necessarily on the individuals who are fulfilling the role of coordinator. It is this researcher's hope that this study will be able to fill the gap of describing in detail how Section 504 coordinators are trained and how they feel about their efficacy in the position of Section 504 coordinator.

Additional Section 504 themes or processes may have been studied; however, the thirteen practices were a result of the synthesis of the literature review and the study's framework of social equity. The social equity framework remains the backbone of this study. This framework continues to reflect the comprehensive review of the literature that states schools must provide equal opportunity for all citizens as a basic, fundamental right. With this guiding framework of equity for all students with disabilities, further professional implications can be made from the results of this study.

Implications for Practice

The implications of this survey are representative of the social equity framework which supports education as a fundamental democratic right of all people, regardless of nationality, religion, or creed. Social equity theory states that all citizens should be treated equally, even the less fortunate. Just as Rawls argued in 1971, education is a basic right of all citizens in a democratic nation. This includes the disabled population. In order to ensure that all citizens receive a decent education, education must have knowledgeable teachers. Teachers who attend high quality, ongoing professional development will be better equipped to identify, diagnose, and treat students with disabilities (Zirkel, 2012). Social equity theory states that the fair, just, and

equitable distribution of public resources should be provided to the less fortunate of society. In *A Theory of Justice* (1971), John Rawls supported the idea of citizens living in a democracy. In his theory on social equity, Rawls argues that in a democratic nation, all citizens should have basic rights as well as equal opportunities. A properly structured society and government will provide equal opportunities for all citizens (i.e., freedom of speech, freedom of religion). Rawl's argues that any redistribution of resources within a nation should not occur unless it benefits the least of the poorest citizens. Even though inequalities exist in all societies, theorist believed inequalities are acceptable if "they actually help out the least fortunate persons in society" (Jedicke, 1997). Social equity theory also emphasizes responsiveness to the needs of citizens rather than the needs of public organizations (Frederickson, 1990). The position of Section 504 coordinator serves some of the least fortunate children with disabilities. The position itself is unique within public school districts. They have numerous responsibilities, face increasing demands as litigation changes procedures, and they must share their knowledge with teams of varying personality traits and interests in order to serve the least fortunate of our children, the disabled. This study supported previous research pertaining to effective Section 504 coordinators and is consistent with the social equity theory.

This study also revealed that effective Section 504 coordinators are not measured by one defining value (i.e., the amount of professional development hours) but by a plethora of strengths and weaknesses that create job efficacy. The findings from this study revealed 13 themes or practices that participants utilized to quantify their efficacy. In order to make a practical application of the findings of this study, it is advised that these 13 practices be utilized as possible talking points for future Section 504 professional development.

Results of this study provide some additional insight for current 504 coordinators, public school administrators and district leaders. Annual professional development of Section 504 coordinators is crucial to remaining updated on current legal proceedings and implications. Section 504 coordinators must also understand the importance of updating their Section 504 training due to changes in education law and court outcomes. Because Section 504 coordinator responsibilities are so unique and predicated on the ever-changing outcomes of court cases, 504 coordinators need to be afforded training opportunities to learn about the development, implementation, and periodic review of individual accommodation plans for students who qualify under Section 504. In addition, the district administration should clearly communicate the responsibilities and expectations of the Section 504 coordinator position and not unilaterally appoint a coordinator at will. Instructional specialists and assistant superintendents of professional development can use the 13 themes that emerged from this study and the review of literature to create their own Section 504 professional development opportunities within their districts. Building and district administration should use the information from this study to provide their own Section 504 coordinator with the time and resources needed to effectively perform these duties before assuming the role of a Section 504 coordinator. Teachers and instructional teams who are unsure of how to set policies and practices for their own building can utilize this study as a beginning point to creating systematic changes in their own schools.

Results of this study provide some additional insight for educational leadership at the organizational level as well as the state level. It is this researcher's experience that the majority of Section 504 coordinator professional development opportunities are run (for a profit) by education attorneys. Professional development at the organizational level is limited to one annual conference a year in the United States, but with a price out of range for a public school's budget.

These types of professional development opportunities need to become available (in location and price) to public school administrators and educators who are providing services to disabled students on a daily basis.

Recommendations for Future Studies

When considering future areas of research, one might consider building upon this study by conducting a qualitative study regarding successful Section 504 coordinator qualities, by conducting a qualitative study surrounding the challenges of Section 504 coordinators, or by conducting a quantitative study pertaining to OCR compliant resolutions. Each of these possible studies would benefit creators of Section 504 professional development as well as add much needed current research to the sparse amount of literature to date.

This study focused on Section 504 job efficacy as related to hours of professional development. The study incorporated a survey to measure job efficacy. Another worthwhile topic of study would be conducting qualitative interviews with district leadership about how they define best practices among Section 504 coordinators. The interviews could be conducted with one or several groups of administrators at different levels of leadership within the district or among several districts. The resulting descriptive data could be compared with the findings from this study for similarities and differences. Additional research in the area of parent perspectives of the Section 504 process as a whole, or in part, could be extremely beneficial for additional studies. Interviews could be conducted with several parents across districts or across states for similarities and differences in 504 procedures and inclusionary practices of parents in the 504 process.

The review of the literature for this study revealed the importance of professional development for preservice teachers. However, the scope of this study did not include this topic.

Interviews could be conducted with first-year teachers to gather descriptive data, and the resulting data could be analyzed to determine emerging themes. Additional research on any parts of the Section 504 process would be beneficial to better understand how to properly identify and serve students with disabilities. Multiple future studies can deepen the knowledge base of Section 504 and add to the sparse collection of current research available.

Conclusion

Successful Section 504 coordinators have the ability to positively impact students, instructional teams, 504 teams, administration policies, and their districts. As schools face an alarming rate of medical diagnoses and disabilities, Section 504 coordinators must ensure they are employing effective and compliant Section 504 practices. With the recent explosion of academic dishonesty cases in higher education facilities, the practices and procedures of Section 504 used by secondary and post-secondary institutions is gaining attention (Wichard-Edds, 2019). Allegations of using Section 504 special testing accommodation environments as a loop hole to gain access to elite universities are only beginning to surface. The number of universities experiencing “acceptance based on fraud” continues to escalate. These students were qualified as a student requiring Section 504 accommodations by a team led by a Section 504 process coordinator. Now, more than ever, it is important that Section 504 coordinators understand their role and implement the Section 504 process with integrity and fidelity. The only way to narrow “acceptance based on fraud” is to closely examine and monitor Section 504 professional development standards at lower level institutions.

The main objectives of this study were to identify the common demographics of 504 coordinators in Missouri and to determine if there was a statistically significant relationship between hours of professional development and Section 504 coordinator efficacy. A 23-question

survey was developed utilizing the themes that emerged during a comprehensive review of literature. The demographic data were analyzed using frequencies. The thematic data were analyzed using descriptive statistics and bivariate correlation known as the Pearson's r . Conclusions were reached by comparing the relevant literature with the descriptive data gained from the survey. Findings from this study revealed no statistically significant correlation between Section 504 efficacy and hours of professional development. Therefore, this study failed to reject the null hypothesis ($H_0: p \geq 0.5$). Additional data from the 13 process areas were analyzed to determine how participants rated their understanding of each of the 13 processes.

The results of this study were interpreted while considering the overall set of results, the relevant literature, the theoretical framework, and the limitations of the study. When comparing overall correlations of efficacy areas to professional development, the area with the regression analysis closest to a significant level ($>.05$) in the area of understanding effective disciplinary practices ($p = .062$). This theme shows the closest chance of being statistically significant over all the other areas as measured by the Pearson's r . The theme of "Understanding Section 504 Disciplinary Practices" shows the greatest amount of statistical significance when correlated to the hours of professional development in this study. It is important to note that these findings are only relevant to this study and are not representative of all Section 504 coordinators in Missouri or in the United States. This correlational study does not imply causation.

When analyzed, the Correlation Matrix identified a strong correlation that the participants who answered the question pertaining to understanding the definition of Section 504 also answered the question that pertained to the differences in Section 504 and ADA in the same manner. A slightly lower correlation also exists between participants who answered the question pertaining to understanding the referral process and the question inquiring about understanding

the evaluation process. Note that these correlations do not involve the variable of professional development hours; they only show that a moderate correlation exists between the variables to themselves. Even though the data showed no connection between the amount of professional development hours and job efficacy of Section 504 coordinators, other vital information was generated as to how much and to what extent Section 504 coordinators attended professional development. Further review of limitations may account for any inconsistencies in the data generated by this study.

This study of the efficacy of Section 504 coordinators and the hours of professional development led to data and findings that can now add to the meager collection of Section 504 themed studies. More specifically, there is a specific gap in research relating to Section 504 coordinators. Most current data addresses Section 504 policy and procedure and does not give any advisement on the coordinator. *Section 504: What Teachers Need to Know* (Smith, 2002) and *Preparing School Personnel to Implement Section 504* (Shaw & Madaus, 2008) are a few of the first educator related publications in the area of Section 504, both of which break away from Section 504 policies and procedures (the how to) format and begin to discuss the Section 504 team (the who). This study can assist in addressing gaps in literature concerning current Section 504 coordinators, the Section 504 team, and the lack of research devoted to Section 504 professional development. At this time, there is no research related to job efficacy and professional development hours for Section 504 coordinators. As stated earlier in the comprehensive review of literature there are no mandated pre-requirements to this position (Zirkel, 2008; Ennis, Blanton, & Katsiyannis, 2017). It is the hope of this researcher that this study provokes additional questions about how knowledge of Section 504 is being gained. Further studies and data can be used to strengthen current disability related programs. These

programs are available in our public schools today because as a democratic nation, we believe that all people are created equal. In *A Theory of Justice* (1971), John Rawls supported the idea of citizens living in a democracy. Like Rawls, Jedicke (1997) argued that a social service like education should be geared toward the least fortunate because anyone could end up in an intolerable position themselves. Therefore, a just society ensures that all citizens receive a decent education, despite their position in life. A properly structured public school education can meet the needs of all of its citizens, especially the disabled, if it has properly trained educators at the helm, guarding its resources and guiding its implementation.

Chapter One included the problem statement, research questions, rationale for the study and the theoretical framework for the study; Chapter Two presented the review of related literature; Chapter Three included the methodology of the study; Chapter Four presented the results of the study; and Chapter Five included the conclusions and recommendations of the study. The researcher hopes the data and recommendations stimulate a desire to further explore the topics of professional development for Section 504 coordinators. If practices and training do not keep up with current data, many students with unidentified disabilities will be denied an appropriate education. The denial of an education, especially to those who are highly impacted by a disability, would be a disservice and injustice to those who fought so hard to build and protect that basic right.

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APPENDIX A

FIRST PARTICIPANT EMAIL

March 4, 2019

Dear Colleague:

With the ever changing rules and regulations surrounding Section 504 of the Rehabilitation Act of 1973, you undoubtedly have concerns on how to best support students who qualify for Section 504 protections. In order to provided much needed research regarding the professional development being provided to Section 504 coordinators, your response to this survey is greatly needed to enhance the understanding of Missouri's professional development needs with regard to Section 504.

I am conducting research to explore how to enhance professional development opportunities for Missouri's district and building Section 504 coordinators. I want to measure the type and amount of professional development you have already received as a Section 504 coordinator, as well as, what current information you need in order to fulfill your role as a Section 504 coordinator. I am hoping to gather input from both district and building Section 504 coordinators. **This is where I need your assistance.** Once completed, please pass this survey on to the building coordinators, if appropriate. Because Missouri is so diverse in its populations of districts, I understand that you may be the only individual serving as the Section 504 coordinator for your district. However, if your district is large enough to share 504 responsibilities among buildings, **please forward this email to building 504 coordinators as well.**

Your participation in this research is, of course, voluntary. Your confidentiality and anonymity are assured. The completion of this survey is consent for your responses to be compiled with others. Although the survey is coded to allow for follow up with non-respondents, you will not be individually identified with your questionnaire or responses. Please understand that use of this data will be limited to this research, as authorized by Southwest Baptist University, although the results may ultimately (and hopefully) be presented in formats other than the dissertation, such as journal articles or conference presentations. You also have the right to express concerns to me or my doctoral advisor, Dr. Allison Langford, at the SBU Graduate Studies address shown below, or the SBU Research Review Board.

I greatly appreciate your participation in this research. The survey will take approximately 10 minutes to complete. **Please submit this survey within two weeks (by March 15, 2019).** This will save a follow up email to you.

If your district has more than one 504 district coordinator, or has several BUILDING Section 504 coordinators, *please forward this email to them as well.*

Thank you for your interest and participation in this study. I genuinely appreciate your time.

Sincerely,
Cathy A. Robinson
Southwest Baptist University Doctoral Candidate
[314-397-0669](tel:314-397-0669)/crobinson@sbuniv.edu

APPENDIX B

FOLLOW PARTICIPANT EMAIL

March 18, 2019

Dear Colleague:

A few weeks ago I contacted you with an invitation to participate in this study of Missouri's section 504 coordinators. In I am hopeful that you will take advantage of this second opportunity to complete this 8-10 minute survey to voice your needs as a Section 504 coordinator.

I am conducting research to explore how to enhance professional development opportunities for Missouri's district and building Section 504 coordinators. I am hoping to gather input from both district and building Section 504 coordinators. **This is where I need your assistance.** Once completed, please pass this survey on to the building coordinators, if appropriate. Because Missouri is so diverse in its populations of districts, I understand that you may be the only individual serving as the Section 504 coordinator for your district. However, if your district is large enough to share 504 responsibilities among buildings, **please forward this email to building 504 coordinators as well.**

Your participation in this research is, of course, voluntary. Your confidentiality and anonymity are assured. The completion of this survey is consent for your responses to be compiled with others. Although the survey is coded to allow for follow up with non-respondents, you will not be individually identified with your questionnaire or responses. Please understand that use of this data will be limited to this research, as authorized by Southwest Baptist University, although the results may ultimately (and hopefully) be presented in formats other than the dissertation, such as journal articles or conference presentations. You also have the right to express concerns to me or my doctoral advisor, Dr. Allison Langford, at the SBU Graduate Studies address shown below, or the SBU Research Review Board.

I greatly appreciate your participation in this research. **Please submit this survey within two weeks (by March 29, 2019).**

If your district has more than one 504 district coordinator, or has several BUILDING Section 504 coordinators, *please forward this email link to them as well.*

Thank you for your interest and participation in this study. I genuinely appreciate your time.

Sincerely,
Cathy A. Robinson

Southwest Baptist University Doctoral Candidate
314-397-0669/crobinson@sbuniv.edu

APPENDIX C

SECTION 504 PROFESSIONAL DEVELOPMENT SURVEY

Section I: Section 504 Professional Development: The first six questions of this survey is related to your professional development experiences as a section 504 coordinator.

1. Did you receive Section 504 training/professional development before assuming the role of Section 504 Coordinator for your building/district?

Yes

No

2. Do you currently receive ongoing professional development for coordinating Section 504 responsibilities for your building or district?

Yes

No

3. How many hours of Section 504 training have/will you attend for the 2018-2019 School year?

0

1-5

6-10

11-15

16+

Unsure

4. The amount of time spent in Section 504 professional development is sufficient for me to effectively fulfill my responsibilities.

Strongly agree

Agree

- Undecided
- Disagree
- Strongly disagree

5. Where do you receive your Section 504 professional development?

- I have only attended Section 504 professional development inside my district.
- I have only attended Section 504 professional development outside my district.
- I have attended Section 504 professional development both inside and outside of my district.
- I have not attended any Section 504 professional development.

6. Who receives Section 504 professional development/training in your district?

- Regular educators
- Special Educators
- Nurse
- Noncertified staff (bus drivers, cafeteria staff, custodians)
- Special Education Process Coordinators
- Counselors
- Interventionist/Instructional Coaches
- Principals
- Assistant Principals
- Special Education Directors
- Section 504 Coordinator
- Superintendents

Part II: Section 504 Professional Development Needs: The next 13 questions of this survey is related to your specific needs as a Section 504 coordinator.

7. Understanding the **definition of Section 504** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

8. Understanding the **differences between IDEA and Section 504** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

9. Understanding **child find obligations under Section 504** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

10. Understanding the **Section 504 referral process** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

11. Understanding the **Section 504 evaluation process** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

12. Understanding the **Section 504 eligibility process** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

13. Understanding **how to write a Section 504 accommodation plan** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

14. Understanding **how to effectively implement a Section 504 accommodation plan** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

15. Understanding **how to effectively collect data for a Section 504 plan** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

16. Understanding **Section 504 procedural safeguards** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree

- Undecided
- Disagree
- Strongly disagree

17. Understanding **Section 504 disciplinary practices** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

18. Understanding the **Section 504 grievance process** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

19. Understanding **Section 504 court cases, outcomes and implications** is one of my strengths as a Section 504 coordinator.

- Strongly agree
- Agree
- Undecided
- Disagree

Strongly disagree

Part III: Demographics of Section 504 Coordinators: The last five questions of this survey is related to your personal and district demographics as a section 504 coordinator.

20. Gender:

Male

Female

21. How would you describe your district?

Rural

Suburban

Urban

22. What is your current role/position in your school district?

Regular education teacher

Special education teacher

Special education process coordinator

Guidance/counselor

Interventionist/Instructional Coach

Nurse

Assistant Principal

Principal

Special education director

504 Coordinator

Assistant Superintendent

Superintendent

Other:

23. Are you a district or building Section 504 Coordinator?

District Section 504 Coordinator

Building Section 504 Coordinator

24. What educational certificates do you have?

Elementary

Middle School

High School

School Guidance/Counseling

Special Education K-12

Special Education Administration

Elementary Principal

Middle School Principal

High School Principal

Superintendent

Other:

Thank you for completing this survey!