



IPSWICH PUBLIC SCHOOLS

**DEPARTMENT OF
STUDENT SERVICES
504 PROCEDURE MANUAL**

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Section 1: Introduction

Purpose of the Manual

The *Ipswich Public Schools Section 504 Procedure Manual* establishes districtwide procedures to ensure compliance with **Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794)** and its implementing regulations at **34 C.F.R. Part 104**.

This manual provides Ipswich Public Schools staff and administrators with a framework for identifying, evaluating, and accommodating students with disabilities, ensuring that all students have equitable access to the educational opportunities and benefits offered by the District.

- Promote consistent, transparent practices across all schools.
- Ensure alignment with federal and state requirements, including those of the Department of Elementary and Secondary Education (DESE) and relevant guidance.
- Provide clear, step-by-step procedures and reference tools to support daily implementation; and
- Serve as a living document that is reviewed and revised as needed to reflect updated legal standards and case law.

Civil Rights Foundation

Section 504 is a federal civil rights law that prohibits discrimination against individuals with disabilities in programs and activities that receive federal financial assistance. In the context of public schools, this means that no qualified student with a disability may be excluded from participation in, denied the benefits of, or subjected to discrimination in academic, extracurricular, or nonacademic activities due to disability.

The District's responsibility under Section 504 includes:

- Ensuring equal access to educational opportunities;
- Providing reasonable accommodations and related aids or services necessary to afford such access; and
- Preventing and responding promptly to any form of discrimination, exclusion, or harassment on the basis of disability.

Relationship to IDEA

Section 504 is a civil rights law that is distinct from, but related to, the Individuals with Disabilities Education Act (IDEA). All students eligible for Special Education and

related services under the IDEA are also protected by Section 504. However, not all students who qualify for Section 504 protections meet the IDEA eligibility criteria. Section 504 applies more broadly to students who have a physical or mental impairment that substantially limits one or more life activities, even when they do not require specialized instruction.

Commitment of Ipswich Public Schools

Ipswich Public Schools affirms its commitment to nondiscrimination, equity, and inclusion. Through the Section 504 process, the District ensures that each qualified student with a disability receives a Free Appropriate Public Education (FAPE), defined as the provision of General or Special Education and related aids and services designed to meet the student's individual educational needs as adequately as the needs of nondisabled students are met.

Section 2: Key Definitions

To ensure consistent understanding across Ipswich Public Schools, the following definitions apply throughout this manual. These terms are derived from Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794; 34 C.F.R. Part 104), the Americans with Disabilities Act (ADA), and the Americans with Disabilities Act Amendments Act (ADAAA, 2008), as well as relevant federal and state guidance.

Individual with a Disability

A person who:

1. Has a physical or mental impairment which substantially limits one or more major life activities;
2. Has a record of such impairment; or
3. Is regarded as having such an impairment.

Physical or Mental Impairment

A physical or mental impairment includes any physiological, psychological, or neurological condition that affects one or more major body systems or mental processes. This may include, but is not limited to, medical, emotional, or cognitive disorders such as chronic health conditions (e.g., seizure disorders, migraines, ADHD, anxiety, diabetes, PANDAS, etc.), learning disabilities, ADHD, anxiety, depression, or other mental health diagnoses that substantially limit one or more major life activities.

Major Life Activities

Broadly defined and include, but are not limited to:

- Caring for oneself
- Performing manual tasks
- Seeing, hearing, speaking
- Walking, standing, lifting, bending
- Eating, sleeping, breathing
- Learning, reading, concentrating, thinking, communicating, working
- Major bodily functions (e.g., immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions).

Substantial Limitation

Whether an impairment substantially limits a major life activity is determined on a **case-by-case basis** by comparing the student's functioning to that of the typical/average peer in the general education population. The term "substantially limits" is interpreted broadly and does not require that an impairment prevent or

severely restrict a major life activity. An impairment that is episodic or in remission qualifies as a disability if it would substantially limit a major life activity when active. Mitigating measures, such as medications, assistive devices, or learned strategies, must not be considered in determining disability status, except for ordinary eyeglasses or contact lenses.

Free Appropriate Public Education (FAPE) under Section 504

The provision of regular or special education and related aids and services that are designed to meet the individual educational needs of students with disabilities as adequately as the needs of nondisabled students are met, and provided in accordance with Section 504's evaluation, placement, and procedural safeguards requirements.

504 Plan

A written document that describes the accommodations, services, or supports necessary for a student with a disability to access and benefit from education on an equal basis with their peers.

Section 504 Team

A group of persons knowledgeable about the student, the meaning of the evaluation data, and the placement options. Membership varies depending on the student's needs, but generally includes:

- Building 504 Coordinator or Principal/Assistant Principal
- Student's general education teachers
- Related service providers or specialists
- Parent(s)/guardian(s)
- Student (when appropriate)

District 504 Coordinator

The Ipswich Interim Director of Student Services (Meg Finnegan) serves as the District Section 504 Coordinator and is responsible for:

- Overseeing districtwide compliance with Section 504,
- Supporting building-based coordinators,
- Handling grievances and appeals,
- Ensuring procedural safeguards are implemented.

Section 3: Roles & Responsibilities

Successful implementation of Section 504 requires clear roles and accountability at both the District and building levels. Ipswich Public Schools affirms its commitment to ensuring that all staff understand their responsibilities in identifying, evaluating, accommodating, and monitoring students with disabilities.

District 504 Coordinator

Meg Finnegan, NCSP, Interim Director of Student Services

The District 504 Coordinator is responsible for overseeing district-wide compliance with Section 504 of the Rehabilitation Act of 1973. Responsibilities include:

- Ensuring compliance with federal and state regulations.
- Coordinating annual training for staff and administrators on Section 504 procedures.
- Reviewing and updating the 504 Procedures Manual as needed.
- Guiding building-based 504 Coordinators and teams.
- Serving as the grievance officer for Section 504 complaints and appeals.
- Liaising with the Massachusetts Department of Elementary and Secondary Education (DESE) and the U.S. Department of Education's Office for Civil Rights (OCR) as necessary.

Building-Based 504 Coordinators

Each Ipswich Public School Building designates 504 Coordinators who ensure that Section 504 procedures are implemented. Responsibilities include:

- Receiving and processing referrals for 504 evaluations.
- Coordinating the scheduling and facilitation of 504 Team meetings.
- Ensuring parental notice and consent are secured at appropriate stages.
- Maintaining documentation, forms, and records in accordance with district policy.
- Distributing finalized 504 Plans to staff responsible for implementation.
- Monitoring student progress and ensuring consistent delivery of accommodations.
- Serving as the primary contact for parents regarding 504 matters at the building level.

Current Building-Based 504 Coordinators:

- Ipswich High School – LeeAnne Collura, Assistant Principal
 - Beth Downing - Chair
 - Justine May - Chair
 - Claire Powers - Chair

- Christine Ryan - Chair
- Kelly Scott - Chair
- Jennifer Starrett -Chair
- Ipswich Middle School – Sean Fitzgerald, Assistant Principal
 - Laura Ananian - Chair
 - Gena Bevilacqua - Chair
 - Allison Tivnan - Chair
- Winthrop Elementary – Aaron Clark, Assistant Principal
- Doyon Elementary – Lori Benincasa, Assistant Principal

Section 504 Team Members

A Section 504 Team must include individuals who are knowledgeable about:

1. The student and their needs,
2. The evaluation data being considered, and
3. The placement and accommodation options available.

Typical Team members include:

- Building-based 504 Coordinator/Chair
- General education teacher(s)
- Related Service Providers/Specialists as appropriate (e.g., nurse, counselor, school psychologist)
- Parent(s)/guardian(s)
- Student (when appropriate, especially at secondary level)

Staff Responsibilities

All staff members play an active role in ensuring the success of students with 504 Plans. Responsibilities include:

- Implementing all accommodations as outlined in a student's 504 Plan.
- Protecting the confidentiality of student information.
- Monitoring and documenting student progress and concerns.
- Participating in 504 meetings and reevaluations when requested.
- Promptly reporting any barriers to accommodation implementation to the building 504 Coordinator/Chair.

Training and Accountability

- The District will provide annual training to administrators, teachers, and staff on Section 504 requirements and procedures.
- Building-based Coordinators/Chairs will ensure that all relevant staff members are provided with updated copies of student 504 Plans and understand their responsibilities.

- Compliance is considered a core professional responsibility of all Ipswich staff members.

Section 4: Identification, Referral, and Child Find

Ipswich Public Schools has a responsibility under Section 504 to identify, locate, and evaluate students who are suspected of having a disability and who may require accommodations in order to access a Free Appropriate Public Education (FAPE). This obligation, known as [Child Find](#), applies to all students residing within the District, whether they are enrolled in public schools, placed in private schools by their parents, experiencing homelessness or foster care placement, or otherwise known to the District.

Child Find Obligations

- Conduct annual outreach to parents, community agencies, private/parochial schools, and organizations serving children who may have disabilities.
- Include information about Section 504 rights and referral processes in district publications (e.g., student handbooks, website, annual notices).
- Collaborate with community partners (e.g., early intervention, shelters, pediatricians, local mental health agencies) to identify children who may require services.
- Provide periodic reminders to staff of their responsibility to refer any student suspected of having a disability for a 504 evaluation.

Referral for Evaluation

Any person who has knowledge of, or a concern that, a student may have a disability may initiate a referral. This includes:

- Parents/guardians
- Teachers or other school staff
- School administrators
- Related service providers
- Outside professionals (e.g., physician, therapist)
- The student themselves (particularly at the secondary level)

Referral Process:

Referrals for Section 504 consideration must be submitted in writing by a parent/guardian, a school staff member, or another knowledgeable individual. Written referrals are submitted to a Building-Based 504 Coordinator/Chair. Upon receipt, the Coordinator must review the referral and, when appropriate, initiate the evaluation process by providing written notice of rights and obtaining informed written parental consent prior to any evaluation activities.

Timeline for Processing Referrals

- The Building-based 504 Coordinator will notify the parent/guardian in writing, explain procedural safeguards, and request consent for evaluation.
 - Alternatively, a 504 plan can be developed without a formal district evaluation, as outlined in the “Evaluation Procedures” section below;
- Evaluations will be conducted in a timely manner, generally within 30–45 school days of receiving parental consent, unless otherwise agreed upon.

Child Find for Special Populations

- **Private School Students:** Ipswich will make Child Find activities available to students with disabilities who reside in Ipswich and attend private schools.
- **Homeless and Foster Youth:** Consistent with the McKinney-Vento Act and state education stability laws, Child Find extends to students who are homeless or in foster care placement.
- **Students in Transition:** For students transferring from other districts with an existing 504 Plan, Ipswich will review the plan and either adopt it or reconvene a team meeting to determine eligibility and services.

Parent Notification

Parents/guardians will be informed in writing of:

- The reason for the referral,
- The nature of the proposed evaluation,
- Their rights under Section 504 (procedural safeguards),
- The expected timeline for eligibility determination.

Documentation

All referrals, parental notices, consent forms, evaluation reports, and eligibility determinations must be maintained in the student’s cumulative file in accordance with district policy and student record regulations.

Section 5: Evaluation Procedures

Ipswich Public Schools is committed to conducting fair, comprehensive, and legally compliant evaluations for students referred under Section 504 of the Rehabilitation Act of 1973. Evaluations ensure that eligibility determinations are made on an individualized basis and that decisions are based on reliable, relevant data.

Parental Consent

- Written parental/guardian consent is required prior to any initial Section 504 evaluation.
- Parents must be provided with a copy of Procedural Safeguards (see Section 10 below) at the time of consent.
- Consent forms must specify the areas to be evaluated and types of data to be collected.

Scope of Evaluation

- Evaluations must consider information from a variety of sources, such as:
 - Standardized assessments
 - Classroom observations
 - Teacher reports and grades
 - Parent/guardian input
 - Medical or clinical documentation
 - Attendance and behavior data
 - Work samples and portfolios
- The Section 504 Team must ensure that the evaluation process is tailored to assess the suspected area(s) of disability and educational impact.

Evaluation Standards

- Evaluations must:
 - Be conducted by trained personnel.
 - Be valid for the specific purpose for which they are used.
 - Measure the student's abilities rather than the student's sensory, manual, or speaking skills (unless those skills are being measured).
 - Do not rely solely on a single general intelligence score.
- The Team must avoid cultural, linguistic, or socioeconomic bias in the evaluation process.

Mitigating Measures

In accordance with the Americans with Disabilities Act Amendments Act (ADAAA, 2008):

- A student may **not** be denied eligibility solely because the use of mitigating measures (e.g., medication, assistive technology, learned strategies, prosthetics) reduces or compensates for the impact of the impairment.
- Ordinary eyeglasses or contact lenses are the only mitigating measures that may be considered in determining disability status.

Timeline

- Evaluations will be completed within 45 school days of receiving signed parental consent, unless a mutually agreed-upon timeline is established.
- Parents will be informed promptly if additional time is needed due to exceptional circumstances (e.g., delays in receiving medical records, hospitalizations, etc.).

Reevaluations

- Students with Section 504 Plans should be reevaluated periodically, at least every three years, or sooner if:
 - A parent/guardian requests reevaluation.
 - A significant change in placement is being considered (e.g., disciplinary removal, change in setting, or exiting from 504 services).
 - New information becomes available that suggests a reevaluation is appropriate.
- Reevaluations follow the same procedural safeguards and consent requirements as initial evaluations.

Use of Privately Obtained Evaluations

Parents/Guardians may provide privately obtained evaluations for the District's consideration. The Section 504 Team will review and consider all relevant private evaluation data in conjunction with school-based information. However, the Team is not required to adopt private recommendations in full. Eligibility and accommodation decisions are made collaboratively by the Team, based on the totality and credibility of all available evidence.

Documentation

The Building-based 504 Coordinator must ensure that all evaluation data, consent forms, reports, and meeting notes are stored in the student's confidential file and accessible only to staff with legitimate educational interest.

Section 6. Procedural Safeguards & Parent/Student Rights

Procedural safeguards protect the rights of students with disabilities and their parents/guardians under Section 504. Ipswich Public Schools is committed to ensuring that all families are fully informed of these rights at every stage of the 504 process.

Parents/guardians must receive a written copy of these safeguards:

- When their child is referred for a 504 evaluation,
- When the District seeks consent for an initial evaluation,
- When a student is determined eligible or ineligible,
- When a 504 Plan is developed or revised,
- Upon reevaluation, and
- Upon request at any time.

Rights of Parents/Guardians and Students

Parents/guardians and students (when appropriate) have the right to:

- **Receive notice** of any district decision regarding identification, evaluation, eligibility, accommodations, or placement.
- **Obtain consent** before conducting initial evaluations or implementing a 504 Plan.
- **Review educational records** related to Section 504 decisions.
- **Participate in meetings** where eligibility, placement, or accommodations are determined.
- **Request an evaluation** if you believe your child may have a disability that requires accommodations or services.
- **Request a reevaluation** if they believe needs have changed.
- **File a grievance** with the District 504 Coordinator if they disagree with decisions or believe discrimination has occurred.
- **File a complaint with external agencies**, including the Massachusetts Department of Elementary and Secondary Education (DESE) Problem Resolution System (PRS) or the U.S. Department of Education Office for Civil Rights (OCR).

- **Appeal a decision to the Bureau of Special Education Appeals (BSEA).**
- **Receive a copy of this Procedural Safeguards notice** whenever required.

Internal Grievance Procedure

Ipswich Public Schools encourages resolution of disputes at the local level whenever possible.

1. Parents/guardians should first raise concerns with the Building-based 504 Coordinator.
2. If not resolved, concerns may be submitted in writing to the District 504 Coordinator ([Director of Student Services](#)).
3. The District 504 Coordinator will investigate and provide a written response within a reasonable timeframe, typically 10–15 school days.
4. If disagreement persists, parents/guardians may pursue external remedies.

External Complaint Procedures

Parents/guardians have the right to file complaints with:

Massachusetts Department of Elementary and Secondary Education (DESE)

Problem Resolution System (PRS)
135 Santilli Hwy, Everett, MA 02149
Phone: (781) 338-3700
Website: DESE PRS Information

U.S. Department of Education, Office for Civil Rights (OCR)

400 Maryland Avenue, SW
Washington, D.C. 20202-1475

Due Process Hearing

In addition to grievances and complaints, parents/guardians may request an impartial due process hearing if they disagree with identification, evaluation, eligibility, or placement decisions under Section 504.

- Requests may be submitted in writing to the District 504 Coordinator, who will provide details on filing for a hearing through DESE.
- Parents may file directly with the Bureau of Special Education Appeals at bseapleadings@mass.gov
- Hearings are conducted by an impartial hearing officer, and parents have the right to representation.

Section 7: Eligibility Determination

After a referral and evaluation are completed, the Section 504 Team convenes to review the data and determine whether the student is eligible for protections and services under Section 504. Eligibility decisions must be made on an individualized basis, using multiple data sources, and with full consideration of parent input.

Eligibility Criteria

A student will be found eligible under Section 504 if;

1. The student has a physical or mental impairment;
2. The impairment substantially limits;
3. One or more major life activities (e.g., learning, concentrating, breathing, walking, thinking, attending school regularly).

Team Membership

- The eligibility determination is made by a 504 Team, consisting of persons knowledgeable about:
 - The student and their needs;
 - The evaluation data.
 - The placement and accommodation options.
- Membership typically includes the building-based 504 Coordinator/Chair, general education teacher(s), specialists (e.g., counselor, nurse, psychologist), parent(s)/guardian(s), and, where appropriate, the student.

Parent/Guardian Participation

Parents/guardians must be invited to all Section 504 eligibility meetings. They must receive prior written notice of the meeting (meeting invitation), a copy of the procedural safeguards, and, when possible, evaluation reports in advance. The Section 504 Team must actively consider parental input as part of the eligibility determination and ensure that parents/guardians have the opportunity to participate meaningfully in all decisions regarding their student's identification, evaluation, and placement.

Determination Process

- The Team will discuss and document whether the student meets the criteria.
- If eligible, the Team will develop a written Section 504 Accommodation Plan (see [Section 8](#)).
- If not eligible, the Team will:
 - Provide written notice to parents/guardians explaining the decision;
 - Provide a copy of procedural safeguards;
 - Consider whether the student may benefit from other district supports (e.g., general education interventions, MTSS).

Documentation

At the conclusion of the eligibility meeting, the Building-based 504 Coordinator/Chair will ensure:

- Completion of the Eligibility Determination Meeting Summary
- Signatures of all participating Team members.
- Copies are provided to the parent/guardian and filed in the student's cumulative file.

Section 8. The 504 Plan

Once a student is determined to be eligible, the Section 504 Team develops a written plan that outlines the accommodations, services, and supports necessary to ensure the student has access to a Free and Appropriate Public Education (FAPE).

Purpose of the 504 Plan

The 504 Plan is intended to:

- Remove barriers to access and participation caused by disability,
- Ensure equal access in academic and nonacademic settings,
- Provide clarity for staff on their responsibilities to provide required accommodations per the 504 Plan
- Document the District's compliance with federal civil rights law.

504 Plan Content

Each 504 Plan must be individualized and may include:

- A description of the student's disability and major life activity(ies) affected,
- The impact of the disability on educational access,
- Specific accommodations, supports, or services required, such as:
 - Classroom-based accommodations (e.g., preferential seating, extended time, access to notes),
 - Health and medical accommodations (e.g., access to a nurse, snacks, rest breaks),
 - Attendance or tardiness accommodations (e.g., flexibility in arrival time, excused absences with medical documentation),
 - Testing accommodations,
 - Behavioral or social-emotional supports,
 - Access to extracurricular and nonacademic programs.
- Persons responsible for the implementation of each accommodation.
- A timeline for Annual Review..

Distribution

- The Building-based 504 Coordinator is responsible for distributing the plan to all staff members responsible for implementation (teachers, specialists, support staff).
- Plans should be digitally uploaded to ASPEN promptly to staff.
- Plans must be treated as confidential records under FERPA.

Staff Responsibilities

- All staff are legally obligated to implement the accommodations as written.
- Teachers and staff must promptly report any barriers to implementation to the Building-based 504 Coordinator.
- Failure to implement a 504 Plan may constitute discrimination under federal law.

Monitoring

- 504 Coordinators/Chairs monitor implementation of accommodations through staff communication, student check-ins, and classroom visits as needed.
- Progress monitoring data should be reviewed during reevaluations or as soon as concerns arise.

Transfer Students

- If a student transfers to Ipswich with a 504 Plan:
 - The Building-based 504 Coordinator will review the incoming plan.
 - A meeting will be convened within 30 school days to determine whether to adopt, revise, or develop a new plan.
- If an Ipswich student transfers out, the 504 Plan will be forwarded promptly to the receiving District upon request.

Revisions

- Plans may be revised at any time if new data, medical documentation, or student needs warrant changes.
- Parents may request a meeting at any time to review or revise the plan.
- The Team will meet annually to review the plan and develop a new plan.

Documentation

At the conclusion of the review meeting, the Building-based 504 Coordinator/Chair will ensure:

- Completion of meeting summary
- Signatures of all participating Team members.
- Copies are provided to the parent/guardian and filed in the student's cumulative file.

Section 9. Discipline and Behavioral Considerations

Equal Standards with Protections

- Students with disabilities are subject to the same code of conduct as their nondisabled peers.
- However, additional procedural protections apply when disciplinary actions involve a significant change in placement, such as suspension or expulsion lasting more than 10 consecutive school days, or a pattern of removals totaling more than 10 days in a school year.

Manifestation Determination Review (MDR)

When a disciplinary removal constitutes a significant change in placement, the Section 504 Team must convene within ten (10) school days to determine:

1. Whether the conduct in question was caused by, or had a direct and substantial relationship to, the student's disability; and/or
2. Whether the conduct was the direct result of the District's failure to implement the 504 Plan.

If YES to either:

- The behavior is considered a manifestation of the student's disability.
- The student must be returned to their prior placement (unless parent and District agree otherwise)
- The Team must conduct a review of the 504 Plan and make adjustments as needed to address the behavior.

If NO to both:

- The student may be disciplined in the same manner as nondisabled peers.
- The 504 Team should still review the plan to ensure support remains appropriate.

Protections for Students Not Yet Identified

A student who has not yet been found eligible under Section 504 is entitled to protections if the District had knowledge that the student may have a disability before the conduct occurred. This includes:

- A parent/guardian expressing concern in writing,

- A request for evaluation submitted prior to the incident,
- Staff expressing concerns about a student's pattern of behavior or need for support.

Staff Responsibilities

- Staff must consistently implement behavioral accommodations and interventions outlined in 504 Plans.
- Building-based 504 Coordinators must monitor disciplinary actions involving 504 students and ensure that procedural protections are followed.
- Principals/administrators must notify the District 504 Coordinator (Director of Student Services) immediately when a disciplinary action could constitute a significant change in placement.

Documentation

- All disciplinary removals and MDR decisions must be documented in the student's record.
- Parents/guardians must be provided written notice of disciplinary decisions, manifestation determinations, and procedural safeguards.

Section 10. Confidentiality and Record-Keeping

Purpose

Ipswich Public Schools is committed to protecting the confidentiality of all student records, including records related to Section 504 referrals, evaluations, eligibility decisions, and accommodation plans. The district follows the Family Educational Rights and Privacy Act (FERPA), Massachusetts student record regulations (603 CMR 23.00), and all applicable federal and state laws in maintaining student information.

Confidentiality of Records

- All 504 records are considered part of the student's educational record.
- Records may only be accessed by school personnel who have a legitimate educational interest in the information.
- Information from 504 records may not be shared with outside agencies or individuals without written parent/guardian consent, unless disclosure is otherwise permitted by law.

Record Storage

- Section 504 documents, including referrals, consents, evaluations, eligibility determinations, plans, and procedural safeguard notices, must be stored in a confidential student services file separate from the general cumulative record.
- Access to these files is restricted to the Building-based 504 Coordinator, District 504 Coordinator, and authorized staff with legitimate educational interest.
- Electronic records must be secured in password-protected systems with controlled access.

Distribution of 504 Plans

- The Building-based 504 Coordinator/Chair ensures that all staff responsible for implementing accommodations receive a copy of the student's current 504 Plan.

- Staff members must treat plans as confidential and refrain from disclosing details to unauthorized individuals.
- Each staff member is responsible for maintaining the confidentiality of the plan while ensuring consistent implementation.

Parent/Guardian Rights

Parents/guardians have the right to:

- Inspect and review all educational records pertaining to their child's Section 504 status.
- Request copies of records.
- Request corrections to records if they believe information is inaccurate, misleading, or violates their child's privacy rights.
- Request a hearing if disagreements over records cannot be resolved at the school or district level.

Record Retention

- Section 504 records will be retained in accordance with state and federal requirements.
- Upon graduation, transfer, or withdrawal, parents/guardians will be notified of the District's policy regarding record retention and destruction.
- A permanent record of the student's enrollment, courses, grades, and degree status is maintained, but detailed 504 Plan documents may be destroyed after the legally required retention period.

Section 11. Staff Training and Annual Review

Purpose

Effective implementation of Section 504 requires that all staff understand their roles, responsibilities, and legal obligations. Ipswich Public Schools is committed to providing annual training and ongoing professional development to ensure consistent compliance and support for students with disabilities.

Annual Training Requirements

- The District 504 Coordinator will organize annual training for administrators, teachers, counselors, nurses, and other staff who may be involved in the identification, evaluation, or implementation of Section 504.
- Training will address:
 - The legal requirements of Section 504 and the ADA.
 - Child Find responsibilities.
 - Referral, evaluation, and eligibility determination procedures.
 - Development and implementation of 504 Plans.
 - Confidentiality and record-keeping expectations.
 - Discipline and manifestation determination procedures.
 - Attendance/tardy accommodations
- Building-based 504 Coordinators will reinforce training with building-level staff throughout the year.

Ongoing Professional Development

- New staff will receive training on Section 504 procedures as part of their onboarding process.
- Specialized training may be offered as needed (e.g., medical accommodations, attendance-related supports, discipline protections).
- Coordinators will share updates with staff whenever changes in law, DESE guidance, or OCR case law occur.

Annual Review of Procedures

- The District 504 Coordinator will conduct an annual review of this manual and related forms to ensure compliance with:
 - Federal Section 504 regulations (34 C.F.R. Part 104),
 - Americans with Disabilities Act (ADA/ADAAA), and
 - Massachusetts DESE guidance, including any corrective actions.

- Feedback from building coordinators, staff, and families will be taken into consideration when making revisions.
- Updates will be communicated to all staff, and revised documents will be posted on the District website.

Accountability

- Compliance with Section 504 responsibilities is a core professional expectation for all Ipswich staff members.
- Failure to implement accommodations or follow procedures may be considered a violation of district policy and federal law.
- Building and District 504 Coordinators will monitor implementation to ensure fidelity across the District.