



504 Coordinator Virtual Interactive Training Series: **Role of the Section 504 Coordinator**

School Year 2026-27

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This training is not intended as legal advice and should not be taken as such; we advise you to consult with your legal counsel before making policy or process changes.

This training was provided on August 20, 2026. Subsequent changes to law and policy may impact the accuracy of information in this slide deck. Links to external websites are subject to change.

ODE is available to support with individual technical assistance following this training.

Who We Serve

“My vision is to make sure every child in Oregon is successful and has a safe place to receive a high-quality public education. I’ve seen firsthand how a positive student-teacher relationship can set a child on a successful path for the rest of their life. When we collaborate and build partnerships with students, educators and families we can advance equity and lead all students toward success.”

- *Dr. Charlene Williams*

545,088 Students*

More than 370 languages spoken

90,037 Educators

Staff of Color

- 14% of Teachers
- 15% of Administrators
- 19% of Counselors
- 26% of Educational Assistants

197 Districts

1,267 Schools

127 Charter Schools

19 Education Service Districts

*Numbers represent 2024-25

Session Agenda

Part 2 of 4 Part Series

1. Section 504 Foundations for the 504 Coordinators
2. **Role of the Section 504 Coordinator**
3. Conducting Investigations Part 1
4. Conducting Investigations Part 2

- Distinguishing the 504 Coordinator Role
 - Coordinators vs Case Managers
 - CRCs & ADA Coordinators
- Compliant Notices & Procedures
 - Notice of Nondiscrimination
 - Procedural Handbooks
- Monitoring Compliance with Section 504
 - Auditing Policies & Procedures
 - Disaggregating Data
 - Coordinating with Other Offices
 - Training & Support
 - Record Keeping
- Identifying Section 504 Complaints & Violations

Norms and Expectations

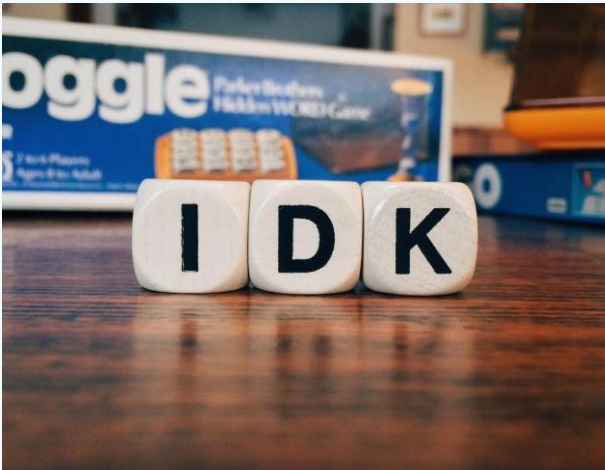
Participants

- Ask relevant questions as they arise
- Remain engaged
- Be open to learning
- Understand the limited scope and time for this training
- Break as needed

Presenter

- Start and end on time
- Answer questions as they arise
- Keep to the content at a peppy-pace
- Provide a copy of the slides
- Schedule technical assistance for individualized questions

Terms & Acronyms



OCR - The US Department of Education Office for Civil Rights

CRU – Civil Rights Unit (ODE)

Child Find - Locating and identifying students with disabilities

FAPE - Free Appropriate Public Education

Placement - The 504 Plan that provides a FAPE in the location that it is provided

MDR - Manifestation Determination Review

FBA - Functional Behavior Assessment

BIP - Behavior Intervention Plan

ASDP - Abbreviated School Day Program



Distinguishing the 504 Coordinator Role

Designation of a Responsible Employee [34 CFR 104.7](#)

The Section 504 Coordinator is responsible for:

- Monitoring and implementing the district's compliance with state and federal laws prohibiting disability discrimination,
- Prevent discrimination against students, employees, and others on the basis of disability,
- Ensuring compliance with all procedures and procedural safeguards required under Section 504,
- Overseeing the district's Section 504 complaint process/grievance policy and ensuring prompt and impartial investigations occur, and
- Assessing and addressing systemic barriers that disproportionately affect individuals with disabilities.

[**ODE Section 504 Coordinator Position Description**](#)

In Practice: 504 Designees

District 504 Coordinators often do not facilitate 504 processes for individual students

Most districts have designees or 504 case managers

The case manager role is not defined in regulation

The case manager:

- Acts as a facilitator of 504 processes
- Relies on the 504 team to avoid unilateral decision making
- Uses processes and procedures under the direction of the 504 Coordinator
- Consults with the 504 Coordinator, as appropriate
- Reports disability-based discrimination, harassment, and FAPE violations to the 504 Coordinator for investigation

Designation of a Responsible Employee [28 CFR 35.107](#)

A public entity shall designate at least one employee to coordinate its efforts to comply with Title II of the ADA, including any investigation of any complaint.

A public entity shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited under Title II of the ADA

This person is often referred to as the ADA or Title II Coordinator

Note: This may be the same person as the 504 Coordinator or other federally required coordinator, or it could be a different designee(s)

Take a Moment: Are you the ADA/Title II Coordinator?
If not, who is your district's ADA/Title II Coordinator?

[ODE ADA/Title II Coordinator Position Description](#)

Duties of the Civil Rights Coordinator [OAR 581-021-0660](#)

- Monitor, coordinate, and oversee district compliance with state and federal nondiscrimination laws, including Section 504
- Oversee and ensure the resolution of discrimination complaints, including remedying any substantiated discrimination
- Provide guidance to school employees on civil rights law and respond to questions
- Coordinate efforts to prevent discrimination
- Receive training on civil rights laws and their specific duties

Take a Moment: Are you the Civil Rights Coordinator (CRC)?
If, not who is your district's CRC?

Coordinator Requirements in Oregon

Title IX

Federal requirement

Section 504

Federal requirement

Title II

Federal Requirement

Civil Rights

State requirement - requires school districts and public charter schools to designate one or more Civil Rights Coordinators to oversee the implementation of civil rights law (ORS 332.505).

In Practice: Coordinating Roles

ADA/Title II Coordinator & 504 Coordinator

- Some responsibilities may overlap, such as program accessibility requirements.
- The ADA Coordinator may have more training in Title II-specific regulations, but the 504 Coordinator should stay apprised of those regulations.
- Coordinators must determine who responds to the accessibility needs of parents/community members and staff and who responds to complaints.

CRC & 504 Coordinator

- Discrimination complaints could be handled by one or the other or divvied up. Both Coordinators should be apprised of the complaints and investigations. This is where a lot of collaboration must occur.
- Procedural requirements will likely be handled by the 504 Coordinator.
- Both should be reviewing data as it relates to accessibility, denial of benefit, disability discrimination & harassment.
- 504 Coordinator may need to help assure the CRC has enough training in disability civil rights to fulfill their designated duties.

In Practice: Other Coordinating Roles & Teams

Includes, but is not limited to:

- Facility Directors: program and facility accessibility
- Information Technology: web and mobile app accessibility
- Nutrition Services: food program accessibility and requirements of the USDA

Also consider:

- The District Equity Committee



Compliant Notices & Procedures



Required Notices

Notice 34 CFR 104.8

The district must provide continuous notice that it does not discriminate on the basis of disability in its education programs and activities and identify the designated 504 Coordinator

This is in alignment with [OAR 581-021-0045](#). **A Notice of nondiscrimination must:**

- Be continuously available on the district website
- Be posted in multiple locations, including but not limited to public-facing documents
- Be made available in the languages of the communities served by the district
- Be disseminated annually

Contain:

- A statement of nondiscrimination that specifies the basis for nondiscrimination being age, disability, national origin, race, color, marital status, religion, sex, sexual orientation, and gender identity;
- The contact information of each civil rights coordinator designated, and each Title IX, Section 504, and ADA Coordinator, including their name or title, work address, email address, and telephone number; a
- A link to or the web address for the district's discrimination complaint process and procedures.

Navigating Nondiscrimination Requirements

02:00

Now go to your school district website:

- **Find** the Notice of Nondiscrimination
- **Find** the Discrimination Complaint Procedure
- **Find** the contact information of the **Section 504 Coordinator**, **ADA/Title II Coordinator**, and **Civil Rights Coordinator**

Think:

How hard or easy was it to find?

How difficult would it be if you spoke a language other than English or needed accessibility tools to navigate the webpages/app due to a disability?

How are you involved in the discrimination complaint procedure?

Location and Notification 34 CFR 104.32

A recipient that operates a **public elementary or secondary education** program or activity **shall annually:**

- (a) Undertake to identify and locate every qualified person with a disability residing in the recipient's jurisdiction who is not receiving a public education; and
- (b) Take appropriate steps to notify persons with disabilities and their parents or guardians of the recipient's duty

Discussion: How do you send your child find notices? How do you send notice to students in private schools, home schooled, and not attending school?



Establishing Procedural Handbooks

Reminder:

Evaluation and Placement [34 CFR 104.35](#)

Preplacement Evaluation: Before taking any action with respect to the initial placement and any subsequent significant change in placement, an evaluation must be completed.

Evaluation: The district must establish standards and procedures for the evaluation and placement of students with a disability.

Placement procedures: In interpreting evaluation data and in making placement decisions:

- (1) draw upon information from a variety of sources
- (2) establish procedures to ensure that information obtained from all such sources is documented and carefully considered,
- (3) ensure that the placement decision is made by a group of persons, including persons knowledgeable about the child, the meaning of the evaluation data, and the placement options

The 504 Procedural Handbook: Who?

District 504 Coordinators

- Oversee the development and maintenance of the handbook
- Update the handbook as new statutes, rules, or guidance is issued
- Train 504 case managers on how to use the handbook

Building 504 case managers

- Follow the handbook
- Lean on the handbook should questions or conflicts arise

The 504 Procedural Handbook: Why?

The Purpose of a 504 Procedural Handbook Includes:

- Fulfilling requirements established by regulation “establish standards and procedures”
- Fulfilling expectations by OCR and DOJ
- Outlining state-specific requirements
- Establishing conformity and standardization across district
- Reducing decision-making load for any one individual
- Reducing conflict should a stakeholder question processes or decisions

The 504 Procedural Handbook: What?

A 504 Procedural Handbook May Include:

- Child find processes
 - How to respond to requests for 504 evaluations
- 504 evaluation process
- Eligibility process
 - Technical eligibility
- Placement processes (the 504 Plan)
 - How to request related services
- Reevaluation processes including the MDR
- 504 Team configurations
 - Role of the parent
- Required notices
- Forms and documentation requirements
 - Cumulative records & SIS
- Meeting guides or checklists
- Communication to stakeholders
- Grievance procedures
- Oregon specific requirements
 - ASDP, FBA, BIP, etc.

Resources for Establishing a Handbook

-----Legal Counsel-----

Other District Models

ODE Resources: [ODE Resources for 504 Coordinators](#)

OCR Interpretation & Guidance: [OCR Disability Discrimination](#)

The Legal Framework: [34 CFR Part 104](#) & [28 CFR Part 35](#)

Community of Practice

In breakout rooms, discuss the following:

1. How has your district developed its Section 504 Procedural Handbook or similar adopted procedures?
2. What processes do you use to update and vet those procedures?
3. How do you assess or audit the use of the established procedures?
4. How are 504 case managers and other educators trained on those procedures?
5. What areas of growth does your district have in this process?



Monitoring Compliance with Section 504

Self-Audit

Districts under the guidance of the 504 Coordinator should regularly audit 504 processes & procedures to assure:

- Compliance with current law and guidance
- Consistency in implementation across the district

Examples of what may be audited:

- 504 procedural handbook for compliance with current law and guidance
- Notices, assuring they are in languages commonly spoken by the community and accessible to individuals with disabilities
- Sample of 504 Plans and records to assure consistency in process and procedure
- Processes and procedures for complaints of discrimination on the basis of disability
- Student and educator experience and perspective

The audit should result in goals for self-improvement. The 504 Coordinator and colleagues should be able to create and implement a plan of action. Document all efforts toward improvement.

Using Data

Districts under the guidance of the 504 Coordinator should regularly disaggregate data based on disability to assure:

- Unreasonable different treatment is not occurring
- Equal access to programs and activities

Examples of data to review:

- Program enrollment: CTE, advanced courses, electives, programs of study, magnet programs, etc.
- Cocurricular and extracurricular enrollment
- Exclusionary discipline
- Disaggregated rates of 504 eligibility by student focal group, including EL students

The data review should result in goals for self-improvement. The 504 Coordinator and colleagues should be able to create and implement a plan of action. Document all efforts toward improvement.

Training & Support

Districts under the guidance of the 504 Coordinator should regularly train and support staff in implementing the requirements of Section 504 to assure:

- Understanding of the law as it relates to discrimination and denial of access
- Compliance with the implementing regulations

Training should be tailored for:

- 504 case managers
- General educators
- Administrators
- Support staff

Staff members who consistently violate the provisions of Section 504 may need a plan of assistance. The 504 Coordinator, supervising administrators, and HR should monitor the plan. Document training, who attended, and all efforts toward improvement.

Options for Training

Internal

This is most effective for training all staff on district adopted 504 processes, how to report disability discrimination, and the basic foundations of Section 504.

District-wide training should be included in the annual PD for all staff.

Districts may choose to use their district's legal counsel in designing training.

External

This is most effective for comprehensive training for staff with significant 504 responsibilities.

It may also be effective when staff are struggling to comply with Section 504 requirements, and it may be part of a remedy when disability discrimination has occurred.

Districts may choose to select free trainings from ODE, as appropriate.

Documentation & Record Keeping

As a general rule, if it isn't documented, it didn't happen.

For example, keep records of:

- Adopted 504 processes and revisions
- Individual student 504 notices, evaluations, eligibility, placement, and meeting notes
- Complaints or grievances as well as the resulting investigation and findings
- Remedies or resolutions resulting from an investigation
- Plans of action to remedy or prevent discrimination from occurring
- All discipline and removals
- Trainings attended or provided

Recordkeeping Requirements

OCR has required recordkeeping of civil rights issues since the 1980s:

Each recipient shall keep such records and submit to the responsible Department official or his designee timely, complete and accurate compliance reports at such times, and in such form and containing such information, as the responsible Department official or his designee may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this part.

34 CFR 100.6(b)

Oregon record retention rules state that records of educational grievance procedures may include, but are not limited to:

...notices of grievance; written description of the complaint; informal discussion notes; formal hearing notes (including audio tapes); summary of interviews with witnesses; final summary statements; resolution of grievance; appeals documentation; and related documentation and correspondence.

OAR 166-400-0060(15)

Recordkeeping & OCR Case Resolutions

OCR has a history of citing inadequate recordkeeping and enforcing recordkeeping systems:

[Alpine School District, 2023](#)

OCR cited the district for inadequate and inconsistent recordkeeping practices. Inadequacies included: only records for some complaints were discipline records, data storage was inconsistent and insecure (kept in emails), no records of safety plans.

[Red Clay Consolidated School District, 2024](#)

“OCR is concerned that the District’s inadequate record-keeping may have impeded the District from identifying whether a hostile environment existed for other students and from taking timely, reasonable, and effective steps to eliminate any hostile environment.”

OCR also has indicated that inadequate recordkeeping impedes a district’s ability to review records and identify patterns of discrimination.



Identifying Section 504 Complaints & Violations

Scenario:

Alia



Photo by Tim Mossholder on unsplash.com

Mr. Kidwell is a school counselor at Meadowlark Middle School. He is also assigned the responsibility of being the 504 case manager for the school. Mr. Kidwell has 425 students on his caseload, 28 of which are on 504 Plans. His regular job duties include scheduling students into classes, developing the advisory curriculum, running counseling groups, completing suicide risk assessments and support plans, collecting data for and facilitating the Care Team, PBIS Team and Attendance Team, supporting the Student Advisory Council, and doing daily lunch duty.

The mother of one of his students, Alia, contacted him at the beginning of the school year. She said that Alia was recently diagnosed with ADHD, and she believed the struggles that Alia historically had at school were related to her inattention. Alia's mom said her doctor told her that Alia might be eligible for a 504 Plan so that she could better access her education. Mr. Kidwell said the school would try 6 weeks of intervention first and then they would reach back out.

It has now been 3 months, and Alia's mom has not gotten communication from the school regarding her request for a 504 Plan. She emailed Mr. Kidwell and copied the principal. In the email she stated:

3 months ago I requested that my daughter Alia receive support through a 504 Plan. As a child with ADHD, she needs specific accommodations so that her inattention is not a barrier to her success in class. At this point, I believe Alia is being denied equal access to her education. She is a bright student and yet she is failing math, science, and health!!! It is ASTOUNDING to me that a parent must continually advocate just for their child to get an appropriate education!!!

Mr. Kidwell approached the principal apologetically and admitted that the request for a 504 evaluation had fallen off his plate. The principal let Mr. Kidwell know that she would contact the district 504 Coordinator before drafting a response to the parent.

Scenario: Alia



Photo by Tim Mossholder on unsplash.com

Respond to one of the following prompts:

1. A procedural violation that stands out to me is _____
2. This may constitute discrimination because _____
3. The 504 Coordinator should _____
4. Something that could have prevented this from occurring is _____

Disability Discrimination*

1. Free Appropriate Public Education
2. Different Treatment/Exclusion/Denial of Benefit
3. Retaliation
4. Disability Harassment
5. Discipline
6. Accessibility: Programs & Facilities
7. Communications (Title II)
8. Accessibility: Technology

Note: Excludes postsecondary complaints. Includes students on IEPs.

*Based on [OCR Data for FY 2024](#)

Common Procedural Violations*

1. Grievance Procedures
2. Designation of a Responsible Employee

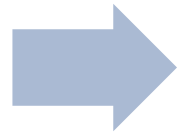
Note: Many investigations note a lack of record-keeping, documentation, and adopted procedures. These violations, while not discriminatory, may lead to discrimination.

**Based on CRDC FY 2024*

How Procedural Errors Lead to Discrimination

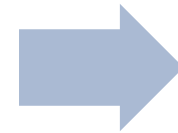
Lack of Procedural Handbook

Mid-Valley School District does not have a 504 Procedural Handbook. Instead, each 504 case manager piecemeals 504 processes together to the best of their ability, based on the knowledge they have.



Errors in Child Find

Because each case manager works from a different framework, the counselor at Meadowlark Middle School believes RTI must be utilized prior to a 504 referral & evaluation.



Denial of FAPE

Some students at Meadowlark are being denied a FAPE due to the RTI process which at times lasts 6 weeks – 6 months even when the students have known or suspected disabilities.

Section 504 Violation & Discrimination Reports

Reports of discrimination may not come through a formal complaint procedure:

- They may be orally reported
- They may be sent via email
- They may be observed by others

Reports of discrimination may be disguised as:

- Repeated requests for a 504 Plan or IEP
- Reports that a 504 Plan or IEP is not being followed
- Reports of bullying
- Reports of exclusion

Tip: *If disability as a protected class may be involved, consider the possibility that it may be discrimination.*



Image by [Nick Youngson](#) CC BY-SA 3.0 Alpha Stock Images

When to Respond

Respond to all discrimination or violations you become aware of, whether or not a “formal complaint” has been filed.

- All discrimination and violations must be addressed; that may or may not include a formal complaint process.
- If you have a discrimination complaint form, you can direct individuals to file through that form; provide filing assistance and support as needed.
- If a complaint comes in through another process (public complaints, bias incidents, etc) but is clearly Section 504 violation or discrimination, respond to it as such.

Examples of When to Respond

A student tells the school counselor that they are being harassed by other students because they have Tourette's syndrome.

A teacher overhears students repeatedly referring to educational assistants assigned to students with developmental disabilities as their “handlers”.

A parent files a public complaint alleging that the science teacher refuses to implement her child's 504 Plan and her child is now failing science.

A student with unlimited bathroom access on their 504 Plan is stopped daily by the hallway supervisor and told to go back to class. The parent calls the teacher to report that her child has had toileting accidents.

A student with a 504 Plan is enrolled under the district's open enrollment policy. Because they have not met the attendance requirements, the registrar is preparing to send notice that their open enrollment is being revoked.

In analyzing behavior data, the PBIS team notices that students with disabilities are sent to the focus room 4x more often than students without disabilities.

What Constitutes a Response?

- Providing notice that a concern has been brought forward or otherwise revealed
 - Instigating an informal process to determine whether a formal process is warranted; and
 - Documenting the rationale, process, and outcome
- Offering a formal complaint process
 - Instigating a formal investigation (this will be covered in the next trainings); or
 - Instigating an informal process with the consent of the parent/guardian and
 - Documenting the rationale, process, and outcome

Community of Practice

In breakout rooms, discuss the following:

1. What is something that stands out to you from today's training?
2. What goals do you have for your district in refining practices?
3. How can you collaborate internally or externally to get this work done and not work within a silo?

Takeaways

Section 504 Coordinators have a specific role that must be defined. The role intersects with the roles of case managers, ADA Coordinators, and CRCs, among others.

Compliant processes and procedures can reduce the likelihood of disability discrimination from occurring.

Establishing processes is not enough, however. Evaluating them for effectiveness through audits and data analysis can help refine and point out areas for continued improvement.

It is important to recognize when Section 504 violation and disability discrimination may be occurring so it may be remedied as expeditiously as possible.

Resources

[OCR Section 504 Parent Educator
Resource Guide](#)

[OCR 504 FAQ](#)

[ODE Section 504 Webpage](#)

[ODE Resources for 504 Coordinators
Webpage](#)

Reach Out & Stay Informed



Marinda Peters:

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- Section 504 virtual or in-person trainings available upon request
- Monthly webinars
- Technical assistance

[504 Coordinator & Case Manager](#)
[GovDelivery Listserv](#)