



NORTH KANSAS CITY SCHOOL DISTRICT

District #74 • Kansas City, Missouri

SECTION 504 COMPLIANCE MANUAL

A Practical, Step-by-Step Guide for Case Managers, Staff & Teams

Revised & Restructured Edition — Updated August 2026
Companion 504 Accommodation Bank available separately

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How to Use This Manual

This manual is organized so you can find what you need quickly, whether you are handling your first referral or looking up a single form. Three features make it easier to navigate:

- ☐ **Clickable** Table of Contents — jump straight to any section.
- ☐ **Navigation** Pane — open View > Navigation Pane in Word to see and click through every heading.
- ☐ **Quick** Jump links below — shortcuts to the sections used most often.

Quick Jump

- ▶ [Section 3: 504 Process at a Glance \(checklist & timelines\)](#)
- ▶ [Section 4: The 504 Process, Step by Step](#)
- ▶ [Section 5: Accommodation Bank \(see companion document\)](#)
- ▶ [Section 6: Disciplining a 504 Student](#)
- ▶ [Section 7: Due Process & Grievance Procedures](#)
- ▶ [Section 8: Frequently Asked Questions](#)
- ▶ [Appendices: Forms, Notices & Flowcharts](#)

Key Legal Reminder

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination against students with disabilities and requires the district to provide a free appropriate public education (FAPE) through accommodations, related services, and/or specially designed instruction.

1. Introduction & Legal Foundation

The Rehabilitation Act of 1973 prohibits entities that receive federal funds from discriminating against individuals with disabilities. Subpart C of Section 504 requires school districts to make programs and activities accessible to and usable by all individuals with disabilities:

“No otherwise qualified individual with a disability... shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

It is the district's responsibility to identify and evaluate students who need specially designed instruction and/or services under Section 504 so they may receive a free appropriate public education (FAPE).

Who Enforces Section 504?

The Missouri Department of Elementary and Secondary Education does not administer or monitor Section 504 compliance (with limited exceptions for vocational programs). Compliance questions should be directed to the Office for Civil Rights (OCR):

- Office for Civil Rights, Kansas City Office — (816) 268-0550
- RELAY MISSOURI (TDD) — (800) 735-2966

District Compliance Contact

At each school, the building Principal or Principal's Designee is responsible for Section 504 compliance. The Executive Director of Student Services coordinates district-wide compliance:

- 2000 NE 46th St, Kansas City, MO 64116-2042
- Phone: 816-321-5000

Equal Access

Section 504 requires the district to provide a free appropriate public education — regular or special education and related services designed to meet the needs of students with disabilities as adequately as the needs of nondisabled students are met. This may require specific accommodations (modifications to district policies/procedures), related services, and/or specially designed instruction.

2. Roles & Responsibilities

A successful 504 process depends on clear ownership at every stage. Use this table to quickly identify who does what.

Role	Primary Responsibilities
Principal / Designee	Owens building-level Section 504 compliance; monitors 504 Team composition to ensure qualified staff and parents/guardians participate.
Case Manager (Counselor or RN)	Coordinates referrals, communicates with parents, selects team members, completes required notices, schedules meetings, and monitors implementation.
504 Team	Reviews data, determines eligibility, and develops the 504 Plan. May include parents/guardians, teachers, counselors, related service providers, administrators, and community agency staff.
Teachers / Implementing Staff	Implement accommodations with fidelity; complete semester Progress Monitoring; sign Documentation of 504 Plan Distribution.
School Nurse	Leads referrals tied to Individual Healthcare Plans (IHPs); often serves as case manager for health-related accommodations.
504 Coordinator (Executive Dir. of Student Services)	District-wide compliance oversight; receives due process hearing requests and grievance forms.
Parent/Guardian	Participates in the 504 Team; provides consent for evaluation and the 504 Plan; may request due process or file a grievance.

3. 504 Process at a Glance

Use this checklist as a running record for each referral. Full detail on every step is in Section 4.

- ☐ **1.** Referral received by Principal/Designee — Case Manager notifies Jennifer Devine to add student to SpedTrack.
- ☐ **2.** Case Manager completes the referral in SpedTrack and makes a determination on whether the student should be evaluated under Section 504.
- ☐ **3.** Case Manager selects 504 Team members and sends meeting notice, Prior Written Notice, Notice of Parent and Student Rights, and Receipt form. Respond within 15 school days of referral.
- ☐ **4.** If evaluation is warranted, complete it within 60 school days of parent consent (30 school days if expedited from an IDEA referral).
- ☐ **5.** If evaluation is denied, send a denial letter with Notice of Rights and Receipt form.
- ☐ **6.** Complete the 504 Evaluation Report and hold a meeting to determine eligibility and need for accommodations.
- ☐ **7.** If eligible, draft the 504 Plan; team members and parent sign in SpedTrack; provide parent a copy of the plan and evaluation.
- ☐ **8.** Distribute the 504 Plan to all implementing staff; each signs the Documentation of 504 Plan Distribution form.
- ☐ **9.** Monitor accommodations each semester using the Progress Monitoring form.
- ☐ **10.** Review the plan annually (Notice to Conduct 504 Meeting sent to parents); reevaluate at least every 3 years or before a significant placement change.
- ☐ **11.** Finalize all documentation in SpedTrack.

Key Timelines

Milestone	Timeline
Respond to a referral	As soon as practicable, within 15 school days
Complete a standard evaluation	Within 60 school days of parent consent
Complete an expedited evaluation (post-IDEA ineligibility)	Within 30 school days of ineligibility determination or referral, whichever is later
Send meeting notice to parents	At least 10 calendar days before the meeting, whenever possible
Review/rewrite the 504 Plan	At least annually
Reevaluate for continued eligibility	At least every 3 years, and before any significant change in placement
Progress-monitor accommodations	Each semester
Request a due process hearing after grievance decision	N/A — grievance decisions are final; due process is a separate right
District response after due process request received	Hearing held within 20 instructional days

Milestone	Timeline
File a grievance	Within 5 school days of the decision being appealed
Petition to appeal a hearing officer's decision	Within 20 school days of receiving the decision
File an OCR complaint	Generally within 180 calendar days of the alleged discriminatory act

 Discipline Reminder

A student with a 504 Plan cannot be suspended more than 10 cumulative school days without a manifestation determination meeting. See Section 6 for details.

4. The 504 Process, Step by Step

4.1 Initial 504: Referring Students for Evaluation

Anyone can request a 504 evaluation — most often a parent, teacher, or school nurse. When a nurse and parents develop or substantially change an Individual Healthcare Plan (IHP), the nurse notifies the counselor and they collaboratively decide whether a 504 evaluation is warranted and who should serve as case manager.

For all other requests:

- The referral goes to the building Principal or Designee, who notifies the Case Manager. The Case Manager emails Jennifer Devine to add the student to SpedTrack.
- The Case Manager then completes the referral in SpedTrack and makes a determination on whether the student should be evaluated under Section 504.
- The Case Manager (Counselor or RN) assembles a 504 Team knowledgeable about the student, the data, and accommodation/placement options — which should include parents/guardians unless they are unwilling or unable to participate.
- The case manager should be positioned to address the concern (e.g., the School Nurse for health-related needs, or a Counselor for classroom-specific accommodations).
- The Principal monitors team composition to ensure qualified staff and parents participate.

A determination to proceed with evaluation is made within 15 school days of referral. The Case Manager sends a SpedTrack meeting invitation, the Notice to Conduct a 504 Evaluation, the Notice of Parent and Student Rights, and the Receipt form — and must obtain a signed Receipt. If the team concludes an evaluation is not warranted, a denial letter is sent with the same Notice and Receipt documents.

4.2 Initial 504: Conducting the Evaluation

- Standard evaluations: completed within 60 school days of consent (written notice with reason required if more time is needed).
- Expedited evaluations (following an IDEA ineligibility determination): completed within 30 school days of that determination or the 504 referral, whichever is later.
- Parents/students may review education records at any time before, during, or after the evaluation.

Section 504 evaluations are not as comprehensive as an IDEA evaluation, but the specific concern that triggered the referral must always be investigated. Case managers gather relevant data — grades, attendance, behavior plans, cumulative file information, psychological evaluations, medical information, observations, standardized testing, teacher recommendations, and parent input. Additional assessments may be added if existing data is insufficient.

Evaluation procedures must be: necessary and appropriate to the suspected disability; tailored to the specific area(s) of need; validated and administered by trained personnel; free of racial, cultural, language, or sex bias; age- and developmentally appropriate; selected/administered to reflect aptitude or achievement rather than the disability (except where the disability is what's being measured); and administered in the student's most familiar language or mode of communication.

If a student is suspected of needing special education under IDEA, a comprehensive special education referral must be initiated in lieu of a Section 504 evaluation.

4.3 Initial 504: Determining Eligibility

A 504 Evaluation Report documents the data considered. At the 504 meeting, the team determines whether the student (a) has a qualifying disability, and (b) needs accommodations, services, or specially designed instruction for equal access. A copy of the final report is provided to the parent(s).

Three-Part Disability Test (all three must be met)

- Physical or Mental Impairment — any physiological disorder/condition or mental/psychological disorder; not limited to a specific list of diagnoses.
- Substantially Limits — the impairment must impose a considerable limitation on a major life activity, construed broadly in favor of coverage. Mitigating measures (other than ordinary eyeglasses/contacts) cannot be considered at this stage — e.g., medication, assistive technology, hearing aids, prosthetics, or learned adaptive behaviors.
- Major Life Activity — includes eating, sleeping, standing, lifting, bending, reading, concentrating, thinking, communicating, self-care, manual tasks, walking, seeing, hearing, speaking, breathing, learning, working, and major bodily functions (immune, reproductive, digestive, neurological, respiratory, circulatory, endocrine, etc.).

Note: current illegal drug users are, with few exceptions, excluded from Section 504 protection.

Determining Need for Accommodations

If the student has a disability, the team determines whether accommodations, services, or specially designed instruction are needed for equal access — and here, mitigating measures may be considered. Ask: does the student need a change to the school's "general rule" to have equal access? If a student does not need any accommodations, a 504 Plan is not required, though the student retains rights under the Notice of Parent and Student Rights.

4.4 Initial 504: Notice to Conduct a 504 Meeting

The Case Manager schedules the meeting at a mutually convenient time and sends the Notice to Conduct a 504 Meeting form at least 10 calendar days before the meeting, whenever possible. If parents cannot attend, every effort should be made to reschedule; after repeated unsuccessful attempts, the meeting may proceed without them. A draft Evaluation Report and draft 504 Plan should be sent ahead when possible, though they may also be presented for the first time at the meeting.

4.5 Initial 504: Developing & Finalizing the 504 Plan

If the team determines the student needs accommodations, services, or specially designed instruction, a proposed 504 Plan is drafted — including accommodations for academics, physical education, field trips, extracurricular activities, and other nonacademic programs as needed.

Once finalized, team members and the parent sign the 504 Plan in SpedTrack. The parent may consent or decline to implement the plan. If consent is given, the signed plan is distributed to every staff member who works with the student or implements the plan; each signs the Documentation of 504 Plan Distribution form.

4.6 Initial 504: Progress Monitoring

Every individual implementing the 504 Plan must evaluate the effectiveness of accommodations each semester using the Progress Monitoring form. Any new staff member added mid-year signs the Documentation of 504 Plan Distribution form upon receiving the plan.

4.7 Annual Review

The 504 Plan must be reviewed — and rewritten if necessary — at least annually. The case manager schedules a meeting and sends the Notice to Conduct 504 Meeting form. Reviews can happen more often if the student's

needs or the school's "general rules" change. Use the Periodic Review form to document continued eligibility and any plan changes.

File Storage

All 504 documents are maintained in SpedTrack. Access is restricted to personnel with a legitimate educational interest, consistent with FERPA and applicable law.

4.8 Reevaluation

Reevaluation consent is requested at least once every three years, and before any significant change in placement — defined as an exclusion from the educational program of more than 10 school days, a change from one program type to another, or terminating/significantly reducing a related service. If consent is given, a new Evaluation Report updates the previous one and is maintained with the 504 Plan in a lockable file separate from the cumulative folder. If consent is not given, staff should review existing records for needed plan changes; the district may (but is not required to) request a due process hearing.

4.9 Transition Guidelines

Clear communication between sending and receiving grade levels/schools is essential. Poor transitions can lead to inappropriate accommodations, dissatisfaction, and legal risk.

Moving from grade to grade within the same building

- Consider whether the next learning environment or extracurricular participation will change.
- Hold a planning meeting with current and next teacher(s) — including parents/student as appropriate.
- Rewrite/revise the plan for the next grade, review at a 504 meeting, and obtain parent consent.

Moving between levels or transferring buildings

- Each level's "general rules" differ, so plans often need adjustment (some elementary supports become formal accommodations at middle school, for example).
- The current school provides the 504 Plan to the receiving level; case managers at both levels determine who should attend a meeting to discuss reevaluation or plan changes.
- Once the student begins at the new level, a follow-up meeting can be held at parent or staff request after the new team has had time to observe the plan's effectiveness.

4.10 Terminating a 504 Plan

If school staff believe a 504 Plan is no longer needed, a meeting is held with the full 504 Team (including parents) using the Notice to Conduct 504 Meeting form. The team completes the Progress Monitoring/Annual Review form and determines continued eligibility.

If a parent wishes to withdraw consent, they must provide written notice. The case manager acknowledges the withdrawal in writing, notifies the parent of the date accommodations will cease, attaches the written request to the plan in SpedTrack, and emails Jennifer Devine to deactivate the student in SpedTrack.

5. Accommodation Bank

Now a Companion Document

The full Accommodation Bank has been moved to its own document — 504 Accommodation Bank — so it can be updated, printed, and shared independently of this manual. This section lists what it contains; open the companion document for the full bank.

The companion 504 Accommodation Bank organizes sample accommodations, written in “the student will...” language, into seven categories:

- Instructional & Academic
- Testing & Assessment
- Organization & Executive Functioning
- Behavioral & Social-Emotional
- Environmental & Classroom Setup
- Health, Medical & Attendance
- Technology & Assistive Aids

This bank is an internal document meant to help 504 teams begin the conversation around appropriate accommodations. Language may be reworded to best meet the needs of the individual student, and the bank is not all-encompassing — it does not include every possible accommodation, and teams are not limited to what is listed there.

As a reminder: Section 504 permits accommodations only. It does not permit modifications to content, standards, or expectations — those are only appropriate under an IEP through IDEA. See Section 4.3 of this manual for the full eligibility and need standard.

6. Disciplining a 504 Student

As with IDEA students, a student with a 504 Plan may not be suspended more than 10 school days without a manifestation determination meeting to decide whether the misconduct is a manifestation of the student's disability and/or a direct result of a failure to implement the 504 Plan. A manifestation determination may also be required for a shorter suspension that, combined with prior suspensions, would create a "pattern of exclusion." All manifestation determination meetings are completed by the 504 Case Manager.

Factors considered when weighing a possible pattern of exclusion: the length of each suspension, how close together they occurred, the nature of the misconduct, and the total time excluded from school.

Manifestation determination teams should include those knowledgeable about the student and the data being reviewed — ideally those who designed the 504 Plan, or otherwise teachers, parents, health professionals, and counselors with relevant knowledge. Consider attendance/academic records, psychological evaluation data, behavior plans, discipline records, and staff observations, prioritizing recent information.

Key Rule

If misconduct is a manifestation of the disability, the student cannot be suspended more than 10 school days. Unlike IDEA, if misconduct is NOT a manifestation and the student is suspended beyond 10 days, the district is not obligated to provide educational services beyond what nondisabled students receive during suspension. In all cases, a 504 student must never be disciplined more severely than a nondisabled student would be under the same circumstances.

7. Due Process & Grievance Procedures

Impartial Due Process Hearing

Parents are entitled to an impartial due process hearing regarding the identification, evaluation, or placement of their student. Complete the Request for Due Process Hearing form (Appendix D) and send it to the Section 504 Coordinator / Executive Director of Student Services at 2000 NE 46th St, Kansas City, MO 64116-2042, phone 816-321-5000.

- A hearing is scheduled as soon as practicable, on a date set by the hearing officer.
- The student may have parents/guardians participate and be represented by counsel at their own expense.
- Either party may appeal an unsatisfactory decision to federal court.

Grievance Process

For issues not eligible for due process, or that cannot be resolved at the building level, complete the 504 Grievance Form (Appendix E) and send it to the Section 504 Coordinator within 5 school days of the decision being appealed. The Coordinator's review may include meetings with the student/parent(s) and staff, and a review of the file; a written determination follows promptly and is final. Parents may still elect a due process hearing on identification, evaluation, or placement issues even if the grievance process is used.

Office for Civil Rights

Parents may file a complaint with the Regional Office for Civil Rights regarding Section 504 matters. Contact information is provided in the Notice of Parent and Student Rights (Appendix B).

8. Frequently Asked Questions

Are there any impairments that automatically qualify as a disability?

No. The impairment must substantially limit one or more major life activities.

Can a medical diagnosis alone serve as the evaluation?

No. A diagnosis is one source among many — including district assessments, teacher input, adaptive behavior, and parent input.

Does a medical diagnosis guarantee a 504 Plan?

No. The team must also confirm a substantial limitation on a major life activity and a genuine need for accommodations, services, or specially designed instruction.

How should a temporary impairment be viewed?

It is not a disability under Section 504 unless it is severe enough to substantially limit a major life activity for an extended period — evaluated case by case.

Is an episodic condition or one in remission covered?

Yes, under certain circumstances. A plan can include accommodations that apply when the condition is active.

When is a 504 Plan inappropriate?

Common misuses include writing a plan from a diagnosis alone, solely for extended time on college entrance exams, or automatically after a student exits IDEA or is found ineligible for special education — all without completing the Section 504 evaluation process.

What if a transferring student already has a 504 Plan from another district?

The 504 Team reviews the plan and supporting documentation. If appropriate, it must be implemented; if not, the evaluation process should be initiated.

Are students found ineligible for a 504 Plan still protected?

Yes. Section 504 also protects students with a record of an impairment or who are regarded as having one, even without a current 504 Plan.

If a 504 Plan references an Individual Healthcare Plan (IHP) that needs small adjustments, must the full team meet each time?

It depends on how the plan is written. Teams may either fold the IHP into the 504 Plan (requiring full-team review for any change) or include language allowing small IHP adjustments between meetings based on a doctor's recommendation or parent request.

Appendices: Forms, Notices & Flowcharts

The forms and notices below are legally required documents used throughout the 504 process. Fillable versions are maintained in SpedTrack; printable copies follow for reference.

Appendix	Document	Used When
A	Procedural Safeguards	Sent with every evaluation notice, denial, and meeting notice.
B	Notice of Parent and Student Rights	Sent alongside Procedural Safeguards at every key decision point.
C	Receipt for 504 Notice of Parent and Student Rights	Signed by parent to confirm receipt of rights notice.
D	Request for Due Process Hearing	Completed by parent/district to request an impartial hearing.
E	504 Grievance Form	Completed to raise a grievance not eligible for due process.
F	IDEA/504 Flow Chart	Reference for determining the correct pathway (IDEA vs. 504).
G	504 Support Services Workflow	Reference for OT/PT/Speech/Hearing/Vision referrals.
H	Consent to Evaluate (Prior Written Notice) — SpedTrack Steps	Step-by-step SpedTrack instructions for the Notices tab.
I	504 Annual/Periodic Review Procedures (SpedTrack)	Case manager workflow for the required 12-month review.
J	504 Reevaluation Procedures (SpedTrack)	Case manager workflow for the required 3-year reevaluation.
K	Section 504 Timing Guidelines	Quick-reference table of every 504 deadline in one place.
L	NKC Initial 504 Referral Workflow (Chart)	Visual, role-by-role flowchart of the initial referral process, including the 504 Facilitator role.

Appendix A: Procedural Safeguards

In compliance with the procedural requirements of Section 504, the following Notice of Parent/Student Rights in Identification, Evaluation, and Placement is utilized in North Kansas City Schools. Questions may be directed to the Section 504 Coordinator, Executive Director of Student Services, 2000 NE 46th St., Kansas City, MO 64116, phone (816) 321-5000, fax (816) 321-5437. Parents/guardians may also meet with the superintendent or designee and/or the local school board to resolve objections to evaluation or placement.

Enforcement

Section 504 is enforced by the U.S. Department of Education, Office for Civil Rights: One Petticoat Lane, 1010 Walnut Street, 3rd Floor, Suite 320, Kansas City, MO 64106. Phone (816) 268-0550; Fax (816) 268-0599; TDD (800) 877-8339; Email OCR.KansasCity@ed.gov.

Summary of Rights (see 34 C.F.R. Part 104 for full regulations)

- Participate in and benefit from public education programs without discrimination (§104.21).
- Receive FAPE regardless of the nature or severity of disability (§104.33(a)).

- Receive education and related aids/services designed to meet individual needs as adequately as those of nondisabled students (§104.33(b)).
- Receive free educational services except for fees charged to all students (§104.33(c)).
- Be educated with nondisabled peers to the maximum extent appropriate (§104.34(a)).
- Be educated in comparable facilities with comparable services and activities (§104.34(b)(c)).
- Be evaluated prior to initial placement and any subsequent significant change in placement (§104.35(a)).
- Be evaluated and tested per regulations governing evaluation procedures (§104.35(b)).
- Have evaluation and placement decisions based on a variety of sources (§104.35(c)(1)).
- Have data interpreted and placement decided by knowledgeable, documented, and carefully considered sources (§104.35(b)(c)(2)).
- Have placement decisions made by persons knowledgeable about the student, the data, and placement options (§104.35(c)(3)).
- Receive periodic evaluations (§104.35(d)).
- Have equal opportunity to participate in nonacademic and extracurricular activities (§104.37).
- Receive notice prior to any district action on identification, evaluation, or placement (§104.36).
- Examine relevant records related to identification, evaluation, program, and placement decisions (§104.36).
- Request an impartial hearing and appeal district decisions, at district expense, with the right to counsel.

Due Process Hearing & Appeal Procedure

- Request a hearing from the superintendent or Section 504 Coordinator, stating the specific reason(s); the superintendent appoints the hearing officer.
- The district may also initiate a hearing and must notify the parent of its specific reason(s).
- Hearings are conducted within 20 instructional days of the request, unless extended, at a time/place reasonably convenient to the parent.
- Either party may petition to appeal within 20 school days of receiving the hearing officer's decision; an independent appeals officer reviews the record within 20 school days of the petition, unless extended.
- A transcript of the review is made available upon request; either party may further appeal to civil court.

This procedure does not deny the right to file a complaint in federal court or with the U.S. Department of Education. This document is not a substitute for legal advice; see 34 C.F.R. Part 104 for the complete regulations.

Appendix B: Notice of Parent and Student Rights

This is a plain-language notice of your and your child's rights under Section 504, and the rights you have if you disagree with the school district's decisions.

What Is Section 504?

Section 504 of the Rehabilitation Act of 1973 is a federal law that protects students from discrimination based on disability, assuring educational opportunities and benefits equal to those provided to students without disabilities. Eligibility requires a physical or mental impairment that substantially limits one or more major life activities.

Your Child's Education — Your Child Has the Right To:

- Receive a free and appropriate public education.
- Participate in and benefit from district educational programs without discrimination.
- Equal opportunity to participate in nonacademic and extracurricular activities.
- Be educated with nondisabled peers to the maximum extent appropriate.
- Be educated in comparable facilities with comparable services.

- Receive accommodations and/or related aids and services for equal participation.
- Receive educational and related aids/services without cost, except fees charged to all students.
- Receive special education services if needed.

Your Child's Educational Records — You Have the Right To:

- Review records and receive copies at reasonable cost (free if cost would prevent review).
- Request correction of records you believe are wrong, misleading, or privacy-violating, with the right to an impartial hearing if refused.
- A response to reasonable requests for explanation/interpretation of records.

The Section 504 Process — You Have the Right To:

- An evaluation before eligibility is determined.
- Notice before any district action on identification, evaluation, or placement.
- Evaluation/placement decisions made by a knowledgeable "504 team."
- Decisions based on varied sources (tests, teacher input, medical records, parent observations).
- Refuse consent for initial evaluation and initial placement.
- Periodic reevaluations, including before any significant placement change.

If You Disagree

You may request mediation or an impartial due process hearing, with the right to participate and be represented by an attorney. Contact the Section 504 Coordinator: Executive Director of Student Services, 2000 NE 46th St., Kansas City, MO 64116, phone (816) 321-5000, fax (816) 321-5437.

You may also file a complaint with the U.S. Department of Education's Office for Civil Rights (generally within 180 calendar days of the alleged act) or in federal court: Kansas City Office, One Petticoat Lane, 1010 Walnut Street, 3rd Floor, Suite 320, Kansas City, MO 64106. Phone 816-268-0550; TDD 800-877-8339; Email OCR.KansasCity@ed.gov.

Appendix C: Receipt for 504 Notice of Parent and Student Rights

The signature below verifies that a copy of the Notice of Parent and Student Rights under Section 504 has been received.

Student:	Date of Birth:
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School:	Grade:	Student ID #:
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Case Manager:

Parent/Guardian Signature:	Date:
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If additional information is needed, please contact:

504 Building Designee Issuing Rights Notice:	Telephone:
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Please sign and return to (Case Manager):
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Appendix D: Request for Due Process Hearing

Student:	Date of Birth:
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Parent/Guardian:	Phone:
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Address:	School:
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Teacher:	Grade:
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Reason for Request (describe the issue(s) concerning identification, evaluation, or placement you are requesting a hearing officer to consider, including relevant dates and district personnel involved):

:

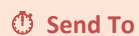
:

:

:

Signature:	Date:
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Signature of Person Receiving Request:	Date:
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Send To

Dr. Shelly Sanders, 2000 NE 46th St, Kansas City, MO 64116 — Fax 816-321-5437

Appendix E: 504 Grievance Form

Date:

Student:	Date of Birth:
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Parent/Guardian:	Phone:
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Address:	School:
-----------------	----------------

Teacher:	Grade:
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Nature of Grievance (describe the policy or action you believe may be in violation of Section 504 or other Civil Rights Statute):

:

:

If others are affected by the possible violation, please give their names and/or positions:

:

:

Please describe any corrective action you wish to see taken. You may also provide other relevant information:

:

:

Signature:	Date:
-------------------	--------------

Signature of Person Receiving Grievance:	Date:
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Dr. Janelle Porter, 2000 NE 46th St, Kansas City, MO 64116 — Fax 816-321-5437

Appendix F: IDEA/504 Flow Chart

Use this simplified decision path to determine whether a student's needs are best addressed under IDEA, Section 504, or both.

Path 1 — Consideration of IDEA

- Does the disability adversely affect educational performance? If no → Not eligible for IDEA (consider Section 504).
- If yes → IDEA eligibility → Is the education reasonably designed to confer benefit? → Specially designed instruction + related services → Individualized Education Program (IEP) → Free Appropriate Public Education (FAPE).

Path 2 — Consideration of Section 504

- Does the disability substantially limit one or more major life activities? If no → Not eligible for Section 504.
- If yes → 504 Protected → Is the education comparable to that provided to nondisabled students? → Reasonable accommodations (physical and/or instructional — specialized education and/or related aids and services) → Accommodation Plan → FAPE.

Both pathways converge on the same outcome: a Free Appropriate Public Education. A student found ineligible on one path should still be considered on the other where appropriate.

Appendix G: 504 Support Services Workflow (OT/PT/Speech/Hearing/Vision)

If a student potentially requires occupational therapy, physical therapy, speech, hearing, or vision services under Section 504, follow these steps:

- ☐ **Determine** the nature of the referral: parent request, a previous 504 accommodation involving OT/PT/Speech/Hearing/Vision, a student exited from an IEP that included these services, or doctor's orders.
- ☐ **Case** Manager contacts the 504 Coordinator with the request and ensures a referral is completed in SpedTrack.
- ☐ **Case** Manager works with parents to complete a Prior Written Notice in SpedTrack.
- ☐ **504** Coordinator contacts the Related Services Coordinator to share the request.
- ☐ **OT/PT/Speech/Hearing/Vision** staff are assigned by Special Services.
- ☐ **Assigned** staff consult with the student and recommend needed services, or inform the case manager that services are not needed.
- ☐ **An** evaluation and/or review meeting is held.

Appendix H: Consent to Evaluate (Prior Written Notice) — SpedTrack Steps

- ☐ **Open** the student's SpedTrack record and click the Notices tab.
- ☐ **Click** "Add Prior Written Notice."
- ☐ **Complete** the form, checking the appropriate Type of Action: Initial Evaluation, Initial Eligibility, Reevaluation, Change of Accommodations/Services, Change of Placement, Removal of Eligibility, or Other (e.g., OT/PT evaluation or consultation). More than one type may be indicated at once — for example, an OT/PT consultation and an initial evaluation together.
- ☐ **Check** the box to print the Parent/Guardian Consent section.

☐ **Complete** contact information, save changes at the top of the page, and print the document from the print section.

☐ **Obtain** the parent's signature; the signed document can be shared with OT/PT staff and uploaded into SpedTrack.

Appendix I: 504 Annual/Periodic Review Procedures (SpedTrack)

Reviews Must Occur Every 12 Months

This workflow documents the SpedTrack steps for the annual (periodic) review of an active 504 Plan.

Step 1 — Initiate the Review

- ☐ Explain the 504 Process to the parent/guardian and document all communication throughout the process in ST (this can be an email).
- ☐ Provide Procedural Safeguards and Parent Rights to the parent/guardian via ST.
- ☐ Solicit feedback from staff about the student's performance (optional tool: Staff Questionnaire); anecdotes and data may also be brought to the meeting.
- ☐ "Make a Copy" of the current 504 in ST and indicate it is a "Periodic Plan Review"; the due date should be the day before the plan expires.

Date of parent communication: _____

Date of staff communication: _____

Step 2 — Conduct the Review

- ☐ Facilitate communication with staff and parent/guardian regarding the student's performance, accommodations, and possible changes to the 504.
- ☐ Document team input and any changes to the student's 504 status.
- ☐ Only if requested: schedule a meeting with the 504 Team (parent/guardian, administrator(s), teacher(s), and other staff as needed). In ST, create "New Meeting," mark "Develop/Review a Section 504 Plan (if needed)," and send to the parent/guardian via ST.

Note: If the review occurs via phone or email and a formal meeting is not held, the last date of communication in which the team came to agreement is the Review Date.

Date of review: _____

Date scheduled (only if applicable): _____

Step 3 — Determine the Outcome (Pick One)

Eligible With Accommodations

- ☐ Update/complete the "Plan" tab in ST.
- ☐ Provide the parent/guardian with the 504 Plan draft and acquire signature via ST.
- ☐ Complete the "Checklist" tab in ST; finalize documentation. Select "Activate — 504 eval has been completed; Student qualified; 504 plan will go into effect."
- ☐ Provide the 504 Plan to teacher(s), administrator(s), and necessary staff.
- ☐ Process complete.

Date provided to parent/guardian: _____

Date provided to staff: _____

Eligible Without Accommodations

- ☐ Remove all info on the "Plan" tab in ST (if the student previously had accommodations).
- ☐ Create PWN — Change of Accommodations on the "Notices" tab and acquire parent/guardian signature in ST (if previously had accommodations).
- ☐ Complete the "Checklist" tab in ST; finalize forms. Select "Complete — 504 eval has been completed; Student did qualify but no 504 plan is needed at this time."

Date provided to parent/guardian: _____

Date staff informed: _____

- ☐ Inform necessary staff that the student is eligible but does not require accommodations.
- ☐ Process complete.

No Longer Eligible

- ☐ Delete all info on the “Plan” tab in ST (if the student previously had accommodations).
- ☐ Create PWN — Removal of Eligibility on the “Notices” tab and acquire parent/guardian signature in ST.
- ☐ Complete the “Checklist” tab in ST; finalize forms in ST; select “Complete — 504 eval has been completed; Student did not qualify.”
- ☐ Inform necessary staff that the student is no longer eligible.
- ☐ Email Jenn Devine with the student's name and ID# to request deactivation due to removal of eligibility.
- ☐ Process complete.

Date provided to parent/guardian:

Date staff informed:

Appendix J: 504 Reevaluation Procedures (SpedTrack)

Reevaluation Must Occur Every 3 Years

This workflow documents the SpedTrack steps for a triennial 504 reevaluation, or a reevaluation requested by the district or parent before the 3-year mark.

Step 1 — Initiate the Reevaluation

- ☐ Explain the 504 Process to the parent/guardian and document all communication throughout the process (this can be an email).
- ☐ Provide Parent Rights and Procedural Safeguards to the parent/guardian via ST.
- ☐ Provide PWN — Reevaluation to the parent/guardian and acquire signature via ST.
- ☐ “Make a Copy” of the current 504 in ST and indicate it is a “Reevaluation (Requested by District OR Parent).”

Date of parent communication: _____

Date of staff communication: _____

Step 2 — Gather Data

- ☐ Solicit feedback from staff about the student's performance and use of accommodations (optional tool: Staff Questionnaire); anecdotes and data may also be brought to the meeting.
- ☐ Compile all existing data and upload it to ST: medical/diagnostic info, grades, discipline, parent/guardian input, assessment data, other health concerns, staff questionnaire(s), Sped/504 evaluations/services, enrollment & attendance, interventions/programs accessed, and other relevant data.
- ☐ Schedule a meeting with the 504 Team (parent/guardian, administrator(s), teacher(s), and other staff as needed) once all existing data has been collected.
- ☐ Enter all existing data on the “Evaluation” tab in ST prior to the meeting.

Date of reeval: _____

Date scheduled (only if applicable): _____

Step 3 — Hold the Evaluation Meeting

- ☐ Bring/share the Draft Evaluation Report from ST.
- ☐ Facilitate the meeting.
- ☐ Document meeting participants and take notes.

Meeting date: _____

Step 4 — Following the Meeting

- ☐ Update the “Evaluation” tab in ST with team member input, determination, and participating team members.
- ☐ Complete the “Checklist” tab in ST.

Date completed: _____

Step 5 — Determine the Outcome (Pick One)

Eligible With Accommodations

- ☐ Update/complete the “Plan” tab in ST.

Date provided to parent/guardian: _____

- ☐ Provide the parent/guardian with the Evaluation Report and draft 504 Plan; acquire signatures via ST.
- ☐ Finalize forms in ST. Select “Activate — 504 eval has been completed; Student qualified; 504 plan will go into effect.”
- ☐ Provide the 504 Plan to teacher(s), administrator(s), and necessary staff.

Date provided to staff:

Eligible Without Accommodations

- ☐ Delete all info on the “Plan” tab in ST (if the student previously had accommodations).
- ☐ Create PWN — Change of Accommodations on the “Notices” tab and acquire parent/guardian signature (if previously had accommodations).
- ☐ Finalize forms in ST. Select “Complete — 504 eval has been completed; Student did qualify but no 504 plan is needed at this time.”
- ☐ Provide the parent/guardian with the Evaluation Report.
- ☐ Inform necessary staff that the student is eligible but does not require accommodations.

Date provided to parent/guardian:

Date staff informed:

No Longer Eligible

- ☐ Delete all info on the “Plan” tab in ST (if the student previously had accommodations).
- ☐ Create PWN — Removal of Eligibility on the “Notices” tab and acquire parent/guardian signature.
- ☐ Finalize forms in ST; select “Complete — 504 eval has been completed; Student did not qualify.”
- ☐ Provide the parent/guardian with the Evaluation Report.
- ☐ Inform necessary staff that the student is no longer eligible.

Date provided to parent/guardian:

Date staff informed:

Step 6 — Close Out

- ☐ If the student IS 504 eligible, the process is complete.
- ☐ If the student IS NOT 504 eligible, email Jenn Devine to update the status; the student will be unassigned from the Case Manager's SpedTrack, and the process is complete.

Appendix K: Section 504 Timing Guidelines

A quick-reference table of every 504 deadline, for fast lookup during a case.

Action	Deadline
Respond to referral	Within 15 days
Complete Evaluation/Reevaluation	Within 60 days of consent received
Complete Evaluation/Reevaluation if first evaluated for Special Education	Within 30 days of the Special Education decision of not eligible, or 30 days of the request for evaluation, whichever is later
Send Notice of Meeting to family	At least 10 days in advance of the meeting
Receipt of Grievance Form	Within 5 days of the decision being appealed
Grievance hearing held	Within 20 days, unless extended by the Hearing Officer or parent/guardian
Petition to review grievance hearing decision — request	Within 20 days of the Hearing Officer's decision
Petition to review — hearing held	Within 20 days of receipt of the Petition to Review request
Periodic Plan Review	Within 364 days of the start of the active plan or decision to qualify, whichever comes first; this process should generally begin at the start of the 11th month of the active plan or decision to qualify
Tri-Annual Reevaluation	Within 1,094 days (2 years, 364 days) of the start of the active plan or decision to qualify, from the initial evaluation or previous reevaluation

Appendix L: NKC Initial 504 Referral Workflow

This chart shows the initial referral process role by role, including hand-offs between the Case Manager (CM) and the 504 Facilitator, required team members, and the two key compliance windows (15 days to complete referral steps; 60 days to complete evaluation and data collection).

NKC Schools Initial 504 Referral Workflow

