

Cambridge Public Schools – Section 504

Kristin Reedy, Ed.D.
Vicki Hornus, M.S.

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Vermont Office
Learning Innovations at WestEd
426 Industrial Avenue, Suite 160
Williston, VT 05401
ph: (802) 951-8220

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Background, Purposes and Evaluation Questions

WestEd, an independent, not-for-profit educational research agency, was asked by the Cambridge Public Schools (CPS) to conduct a review of Cambridge Section 504 processes, policies and procedures. This review was conducted separately from the larger and more comprehensive review of the district's special education programs and services. This report addresses only the 504 portion of the overall review. A full report of the special education portion of the review is forthcoming.

Kristin Reedy, Ed.D., and Vicki Hornus, M.S. were the two primary WestEd evaluators for the review. Biographies and qualifications are included in Appendix A.

WestEd commends the Cambridge Public Schools for undertaking this external review of Section 504 processes, policies and procedures, which clearly demonstrates the district's commitment to improving services, systems and supports for student with disabilities. We especially appreciate the cooperation and support of Dr. Kahris McLaughlin, CPS Affirmative Action Officer, during the review process. We also thank Central Office administrators, building-based administrators and staff and parents for their participation in the review.

Section 504 of the Rehabilitation Act of 1973

Section 504 is a federal law designed to protect the rights of individuals with disabilities in programs and activities that receive federal financial assistance from the U.S. Department of Education. Section 504 provides: "No otherwise qualified individual with a disability in the United States . . . shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" Section 504 regulations may be found at 34 C.F.R. Part 104. Districts are required to provide a "free appropriate public education" (FAPE) to each qualified student with a disability who is in the school district's jurisdiction, regardless of the nature or severity of the disability. Under Section 504, FAPE consists of the provision of regular 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 (Office of Civil Rights, 2009).

Section 504 requires school districts to provide appropriate educational services designed to meet the individual needs of a qualified student with a disability to the same extent as the needs of students without disabilities are met. An appropriate education for a student with a disability under the Section 504 regulations could consist of education in regular classrooms, education in regular classes with supplementary services, and/or special education and related services (Office of Civil Rights, 2009).

To be protected under Section 504, a student must be determined to: (1) have a physical or mental impairment that substantially limits one or more major life activities; or (2) have a record of such an impairment; or (3) be regarded as having such an impairment. Section 504 requires that school districts provide a free appropriate public education (FAPE) to qualified students in their jurisdictions who have a physical or mental impairment that substantially limits one or more major life activities (Office of Civil Rights, 2009).

Evaluation Questions

WestEd was asked to address the following four evaluation questions:

- (1) How are 504 plans determined, written, monitored, and implemented?
- (2) Who is responsible for writing 504 plans at each school?
- (3) To what degree are 504 policies and procedures implemented consistently across schools in the district?
- (4) Recommendations for improving/strengthening the 504 process for students with disabilities served in the Cambridge Public Schools.



Methodology

The data gathering methodology for the Cambridge 504 Review consisted of a mixed methods approach that enabled WestEd to document a variety of perspectives from multiple sources of data including interviews with administrators and school staff, focus groups with parents, a parent survey and document review. Table 1, below, lists the various evaluation activities that were used in the review, including dates, participants and the WestEd team members.

District and School Staff Interviews

WestEd conducted interviews with administrators, both at the Central Office and building levels, teachers, guidance staff and other related services staff. A total of 28 CPS staff were interviewed either individually or in a small group. Example interview protocols are included in Appendix B.

Parent Focus Groups

Three focus groups were held for parents of students protected under Section 504. For the final focus group, held November 9, 2010, a notice and invitation were mailed from the Cambridge Public Schools Central Office to all parents of 504 students attending the Cambridge Rindge and Latin (CRLS) high school. Notice was also given to building

principals PK-8 and they, in turn, were asked to disseminate the information to parents at their schools. In the focus groups, parents were asked about their experience in terms of the 504 process. They were also asked for recommendations to improve the process both at the building and district levels. (Focus group protocols are included in Appendix B.)

Parent Survey

A four-page parent survey was mailed in hard copy in a postage paid, pre-addressed envelope from the CPS Central Office to all parents of students at CRLS grades 9-12 on 504 Accommodation Plans. The Central Office also sent parent surveys to each elementary school principal requesting them to send the invitation letter and survey home with each child who has a 504 Plan. Responses were returned by mail directly to the Learning Innovations at WestEd Vermont Office. A cover letter (Appendix C) was included with the survey to all parents. The letter explained the purpose of the evaluation and listed the specific evaluation questions that WestEd was asked to address. Respondents were assured of confidentiality of their responses.

The development of the parent survey was informed by two preliminary focus groups held by WestEd with parents of 504 protected students (the third focus group was held after the survey had been developed). The focus groups helped WestEd to understand the issues and concerns that were of importance to Cambridge parents and helped in choosing wording for the survey questions. Involvement of the focus groups was intended to strengthen the validity of the survey questions (Fowler, 1984).

Document Review

WestEd reviewed the following types of documents: CPS policies, guidelines, forms and a selection of redacted individual student 504 Plans. Documents were submitted for review by the district.

The Massachusetts Department of Elementary and Secondary (MADESE) report of the Cambridge Public Schools Coordinated Program Review (CPR) (2009) was also reviewed to identify any areas of previously identified noncompliance. (The Cambridge 2009 CPR report is available at <http://www.doe.mass.edu/pqa/review/cpr/reports/2009/0049.pdf>.)

Table 1 Evaluation Activities

Activity	Dates	Sources/Sample	WestEd Team
Interviews (individual and group)	September and October 2010	CPS Central Office Administrators Building principals CRLS Guidance, Deans, Administrators HESP Principal 504 Coordinator CRLS Teachers	Reedy, Hornus
Parent Focus Groups	September 2010 October 2010 November 2010	Parents of students protected under Section 504	Reedy, Hornus, with other WestEd team members
Parent Survey	October 2010	Mailed to all parents of children currently on 504 plans PK-12.	Reedy, Hornus
Document Review	Fall 2010	Coordinated Program Review Report (2009), CPS forms, guidelines, policies and redacted 504 Plans. See list of documents reviewed, Appendix D.	Reedy, Hornus



Results

The results of the evaluation activities are summarized below.

Student Data

At the present time, the number of 504 protected students reported at CRLS is 123 with another estimated 25-30 students at the elementary-middle school level for a total of an estimated 150 students. At CRLS as of September 29, 2010, there were 123 identified 504 students distributed for case management purposes across eight guidance counselors, each with a 504 case load of between 11-21 students.

As of October 27, 2010, the CRLS database report showed that there were 121 students at CRLS. Table 2 below shows the breakdown of identified 504 students by free/reduced lunch status, gender and ethnicity. The majority of 504 students are paying the full price for school lunch (i.e., not low income) and male. Forty-seven percent are White with 31% Black not Hispanic. Compared to the overall population of students at CRLS, White students are slightly over-represented in the 504 student group. CRLS as a whole is 36.3% White, 38.0% Black, and 14.7% Hispanic (MADESE, 2010).

Table 2 Number and Percent of 504 Protected Students at CRLS 10-27-2010

Total number of CRLS students with a current 504 Plan (10/27/2010)	121
Free & Reduced Lunch <ul style="list-style-type: none"> • Free • Reduced • Full Pay 	33/27% 4/3% 84/69%
Gender <ul style="list-style-type: none"> • Male • Female 	69/57% 52/43%
Ethnicity	
• Asian/Pacific Islander	10/8%
• Black not Hispanic	37/31%
• Hispanic	13/11%
• Other-More than one category-Nonhispanic	4/3%
• White not Hispanic	57/47%
Sheltered English	0

Document Review

Coordinated Program Review (CPR) 2009

There were two issues identified in the 2009 Coordinated Program Review that the district was required to address: (1) discipline procedures for students with Section 504 Accommodation Plans and (2) academic counseling for 504 protected students on the full range of general curricular and any occupational/vocational opportunities available to them at the middle school level. (See Appendix E.) Issues related to discipline procedures have been addressed in the *CRLS School Handbook 2010-11*. (See below.)

Policies

Policy documents included the *Cambridge Public Schools Employee Handbook*, which includes the Affirmative Action and Equal Opportunity policies (p.7), the *CPS Non-*

Discrimination Policy and Prohibition Against Sexual Harassment, which pertains to harassment and discrimination of students and employees including procedures for reporting noncompliance (p.3) and the *CPS Non-Discrimination on the Basis of Disability* policy, which pertains to students and staff and references requirements under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.

Guidelines

- The *CRLS Writing 504s: Cambridge Rindge and Latin School Process for Writing Chapter 504 Plans* includes three “scenarios” for writing a 504 Plan at CRLS: (1) student terminated from an Individualized Education Plan (IEP); (2) outside evaluation indicates need for 504; and (3) parent requests 504 Plan.
- The *CRLS Guidelines for Reviewing 504s* addresses annual review of 504 Plans and indicates that the guidance counselor is responsible.
- The *CRLS Process for Monitoring 504 Plans* indicates that the CRLS 504 Coordinator sends plans to teachers, verifies receipt by email, notifies parents, provides a monthly “mass email” to teachers, and specifies that parents should contact their student’s guidance counselor with concerns who, in turn, notifies the Dean of Curriculum in the relevant subject area(s).
- The *CRLS School Handbook 2010-11* includes several sections that pertain to students with disabilities protected under Section 504 or on an IEP. Page 7 in the Student Services section indicates that Guidance Counselors “recommend and assist in the TAT evaluation process” and that “parents/guardians should feel free to contact their child’s guidance counselor whenever they have concerns regarding student programs and progress.” Page 9 relating to assessments indicates that “the assessment program at CRLS involves diagnostic testing in the 9th grade...” and further describes “special testing conditions” for students with “documented disabilities.” Page 34 provides contact information for the Office of Special Education (OSE) and the section on 504 Accommodation Plans indicates that referrals should be made to the CRLS guidance counselor. The CPS Affirmative Action Officer’s contact information is also listed. Pages 62-66 address *Codes of Conduct—Behavior and Discipline—Students with IEPs/504s* and reference the *Rights and Responsibilities Handbook* which outlines discipline procedures for students with disabilities on an IEP or 504 Plan. Page 98 of the *Codes of Conduct* includes procedures pertaining to discipline of students with special needs.
- The *Cambridge Public Schools Guide to Policies for Students and Parents* includes a section on Reasonable Accommodations and Notice of Rights Under Section 504 of

the Rehabilitation Act of 1973 (p.12). The document indicates that “requests for Section 504 accommodations for students can be made directly to the 504 Coordinator at the student’s school.” The document also provides contact information for the Affirmative Action Officer at the district level.

- The *Cambridge Public Schools Guide to Policies, Staff Edition* provides the same information as in the guide for parents indicating that requests for accommodations should be made to the “504 Coordinator at the student’s school” (p.14).

504 Plan Forms

The CRLS 504 Plan form lists the student’s disability category, the impact of the disability on “a major life activity,” accommodations and/or services and calls for signatures of the parent, the Dean and Guidance Counselor.

The Cambridge School Department 504 Plan, intended to be used at the elementary-middle school level, calls for a description of the disability and its impact on a major life activity, addresses eligibility for special education services, and provides a description of necessary accommodations. The form lists team participants and calls for the principal’s signature. Note, based on a review of a selection of redacted individual student 504 plans described below, not all schools use the Cambridge School Department 504 Plan. Rather, individual schools have developed or modified the form to fit with current practice at the building level.

Individual Student 504 Plans

A review of a selection of redacted 504 Accommodation Plans was completed. Plans were selected by the district. Note that this was not a representative sample of the total 504 population served in Cambridge. A total of 16 redacted 504 Plans were reviewed, roughly 11% of the estimated 150 students currently on 504 Plans. Two plans were developed at CRLS and 14 were developed at the elementary-middle school level. Of the 16 plans reviewed, eight or 50% were signed by parents, 13 or 81% were signed by a principal or “school department representative.” Three or 19% had no signatures. Disabilities represented in the 16 plans included four articulation/communication, six specific learning disability, one health/allergy, two Attention Deficit Disorder (ADD), two emotional disability, and one hearing loss. Four plans indicated that the student had previously been on an IEP and three of the four were moved from an IEP to a 504 Plan in their transition from middle to high school.

District and School Staff Interviews

Roles and Responsibilities

Based on interviews, both individual and group, with Central Office Administrators and the Affirmative Action Officer, the role of the 504 Coordinator for Cambridge Public Schools (CPS) is assigned to the district's Affirmative Action Officer. The current Affirmative Action Officer has been in her position since March 1998. According to an interview with the Affirmative Action Officer, herself, job responsibilities cover a range of "equity issues" including Title IX and protections for employees under the Americans with Disabilities Act (ADA) as well as responsibility for overall coordination of Section 504 for the district. The Affirmative Action Officer reports to the district's Executive Director of Human Resources. As described in the interview, the Affirmative Action Officer's role is to serve as a mediator in differences of opinion between parents and schools and the person to whom complaints are brought. She is responsible for developing and ensuring the implementation of district Section 504 policies and procedures. 504 referrals from parents may come to the Affirmative Action Officer but are then referred back to the school the child attends (Pre-K through grade 8) or to the appropriate Learning Community at Cambridge Rindge and Latin (CRLS) for grades 9-12. Referrals may also come from the districts' Family Resource Center.

"[It works]...differently in each school. In most cases, the team would be the principal, affected teachers, or the whole team, guidance or adjustment, and parents. If special education has done testing, that staff come into play so that they all have the same information."

(Central Office Administrator)

The Affirmative Action Officer has an oversight role in terms of 504 Accommodation Plans but reports that she has "never rejected a 504 plan" that was proposed by one of the Cambridge schools. 504 Accommodation Plans are not routinely submitted for review nor is there a Central Office filing system for 504 Plans, however, plans may be submitted to the Affirmative Action Officer if there is a difference of opinion at the building level or if there is a parent concern or complaint. The Affirmative Action Officer reports that there has never been a formal Office of Civil Rights (OCR) complaint brought against Cambridge Public Schools on behalf of a 504 protected student. However, interviews with CRLS staff revealed that the College Board

"It's really about getting the right group of people together at the table."

(Central Office Administrator)

cited CRLS due to the number of students for whom extended time on the Scholastic Aptitude Test (SAT) was requested as an accommodation.

According to interviews with CRLS administrators, responsibility for coordination of Section 504 falls to the part time 504 Coordinator (currently a 5-10 hour per week position) and then to the student's assigned guidance counselor.

At the elementary-middle school level, responsibility for Section 504 rests primarily with the building principal.

Section 504 Process in Cambridge

Cambridge Rindge and Latin

According to interviews with building-level administrators, the CRLS 504 Coordinator is responsible for keeping track of 504 students and distributing 504 Plans, once developed, to all classroom teachers. She maintains a record of all 504 students in the Starbase and notifies guidance counselors when annual reviews are due. She is also the designated contact person for parent questions and concerns.

“The TAT process...it’s not just a hurdle to go through.”

(Building Level Administrator)

At CRLS, administrators and guidance counselors stated that responsibility for Section 504 is placed primarily with the student's guidance counselor who serves as a “case manager” for that student. Guidance counselors interviewed reported that they typically have an overall caseload of up to 200 students with up to an estimated 30 on 504 Accommodation Plans. 504 Plans are written by the student's guidance counselor with input from a school psychologist. Written 504 procedures at CRLS call for an annual review of 504 Plans. (See Appendix D for a list of documents reviewed.)

CRLS is organized around four Learning Communities (LCs). Each LC has a Teacher Assistance Team (TAT). TATs at CRLS function as the 504 Teams for students within each Learning Community. CRLS interview respondents reported variability across Learning

“The TAT process is an opportunity to talk with teachers about effective strategies that are good for all kids.”

(Building Level Administrator)

Communities with regard to how TATs function and how 504 issues are addressed. Common practice is that guidance counselors refer 504 students to TATs in order to obtain input from teachers. 504 Evaluations, if needed, are conducted by the LC School Psychologist.

Elementary and Middle Schools

There are 12 PK-8 elementary-middle schools in Cambridge. All of the schools have their own full time principal. Each school has its own unique characteristics and culture, differences that are celebrated across the community and which give parents a choice of schools, within the constraints of the CPS “controlled choice” system¹.

At the elementary-middle school level, principals and the Affirmative Action Officer report variability in the 504 process. In each school, the 504 Coordinator is perceived to be the building principal or assistant principal, in most cases, but some respondents reported that “this is unclear.” There is no designated “case manager” for 504 students at the elementary-middle school level, although the building principal seems to serve in this role, informally. Some schools reported dealing more systematically with 504 issues than others. For example, one school respondent reported that there is a meeting at the beginning of the school year for all students on 504 Plans or IEPs so that teachers may be informed about the special needs of children coming into their classes. It is unclear from interviews how regular classroom teachers or other relevant staff are informed about 504 Accommodation Plans for individual students.

Professional Development

Interviews with staff and administrators indicate that there is no regularly scheduled professional development for building-based staff including classroom teachers, special educators, paraeducators and other staff who may need to be informed regarding individual student accommodations. Respondents shared varied understandings of their responsibilities related to Section 504 and the differences between Section 504

“Consistency – no formal training for principals. For a school district that has so many policies and procedures and protocols – there is nothing for 504. [We need] everything from forms, to who report to, and training is different from school to school.”

(Building Level Administrator)

¹ See the Cambridge Public Schools Controlled Choice Policy at <http://www.cpsd.us/web/PubInfo/ControlledChoice.pdf>

and the Individuals with Disabilities Education Act (IDEA).

Factors Contributing to 504 Referrals

At the present time, the number of 504 protected students reported at CRLS is 123. According to interviews with CRLS administrators and staff, the numbers of 504 protected students, i.e., those who are formally identified and for whom a 504 Accommodation Plan has been developed, have increased considerably in recent years. This was described by one administrator as “an explosion” of 504 referrals.

CRLS has responded to this increase by establishing a part time building-based 504 Coordinator position. When questioned about what may be contributing to what is perceived as a dramatic increase in 504 referrals, school administrators hypothesized that the following factors are “driving” the rise in numbers of Section 504 protected students. Factors contributing to the increase in 504 protected students at CRLS fall into two main categories: parent requests and school practices; both influenced by respondents’ perceptions of the benefits of Section 504.

“This is catching us by surprise. We’ve never had so many [504s], now we do. How do we deal with the increase?”
(Building Level Administrator)

Parent Perceptions of the Benefits of Section 504 as described by CRLS Respondents

- Parents may not want the “stigma” of special education identification and would prefer protections and accommodations under 504.
- Parents may see a 504 Accommodation Plan as a “safety net” for their student, particularly if the child was formerly on an IEP. A 504 Plan provides protections, leverage and some level of assurance that the student’s needs will be met.
- Parents perceive 504 as a “benefit”; “the next best thing” to an IEP, when a child is determined to be ineligible for special education.
- Parents want the “benefits” that 504 may provide for their student such as extra time on tests and college entrance exams.
- Parents want support for their student in the form of a 504 Accommodation Plan when the student goes on to college.

School Personnel Perceptions That Influence Practice

- There is an “unwritten policy” that students transitioning from middle to high school should move from an IEP to a 504 plan.
- The perception that students moving into CRLS need the protection of a 504 Plan so that the parents have a vehicle to advocate for their child
- The perception that students transitioning into the high school should be “weaned” from an IEP and moved onto a 504 Plan
- 504 is a way to reduce the number of children in special education, i.e., on an IEP.
- 504 is perceived as way to avoid the expense of a formal special education evaluation.
- There may be the perception that it is cheaper to serve a child under 504 than in special education.

“Cambridge prides itself in providing lots of services to kids. When you have parents who really know how to use the system, they will get all of the services that they need. What I worry about are the parents who may not have the leisure of time, or may not feel that they can approach the system.”
(Central Office Administrator)

Parent Input

Focus Groups

Three focus groups were held for parents of students protected under Section 504. A total of 18 parents participated, district-wide, roughly 12% of the estimated 150 504 students currently being served in Cambridge. CRLS parents were more widely represented than elementary-middle school parents in the focus groups. The majority of participants were White. Parents were asked about their experience in terms of the 504 process. They were also asked for recommendations to improve the process both at the building and district levels.

“I would like to see [a change] from the superintendent on down...I would like to see an attitude that is eager; that they want to do a good job. When properly implemented it is a win-win for everyone.”

(Parent)

The overall theme(s) that emerged from focus groups with parents were that CPS has a system that is “broken” and one where parents have to “fight” for services, working hard to

ensure that their children's needs are addressed; one where the parents who are motivated, well-informed and who "push" the system get attention and support but those who are less motivated, poorly informed or unaware do not. Parent participants described a system that is reactive rather than proactive; one that is, as one parent put it, "tired, hidden, and institutionally ineffective." (See Appendix C for the Parent Focus Group protocols.)

Summary of Parent Concerns Identified in Focus Groups

- Poor communication between schools and parents
- Lack of responsiveness of the "system" to parent questions and concerns
- Unnecessary, undue delays in developing or reviewing 504 Accommodation Plans
- Poor, untimely or inadequate transition planning when children move from school to school or grade to grade within schools
- Lack of understanding on the part of teachers about the 504 Accommodation Plans for individual students
- Lack of parent involvement in the development of 504 Accommodation Plans
- Lack of resources "ear marked" for services to students under 504
- Lack of consistent processes and procedures across schools

Summary of Parent Focus Group Recommendations for Improvements in the Section 504 Policies, Procedures and Processes in Cambridge

District-Level

- Establish clear and consistently implemented processes and procedures across schools.
- Use a common 504 Accommodation Plan form across the district.
- Develop a master list/database of all 504 students.
- Establish a consistent transition planning process when students move from one school to another, particularly in the transition from middle to high school.
- Ensure that personnel responsible for 504 are knowledgeable about legal requirements, the nature of various disabilities and how they can be accommodated in an educational setting.
- Develop clear guidelines for parents and inform parents of their rights under Section 504.

- Increase school personnel’s cultural awareness and responsiveness to under-served parents/students and provide outreach to those populations.
- Work toward a “cultural shift” from a reactive to proactive, responsive and respectful system.

School Building Level

- Establish a full time 504 Coordinator position at CRLS and identify a 504 Coordinator in each elementary building.
- Require and initiate 504 Accommodation Plan review meetings with parents on at least an annual basis.
- Ensure that all teachers of the individual student receive a copy of the 504 Plan and understand their responsibilities for implementation.
- Use the Learning Communities at CRLS as a structure for organizing and managing 504.
- Establish a “learning center” to provide support to academically struggling students at CRLS, regardless of 504 or special education eligibility.
- Within schools, provide a range of supports and services that is responsive to the educational needs and accessible to *all* students, regardless of whether or not the student has an identified disability.

Parent Survey

Of an estimated 150 potential respondents PK-12, 20 surveys were returned, yielding a 13% response rate. The majority of responding parents selected the category White not Hispanic (80%) as their race/ethnicity category. Student disabilities represented in the survey responses were primarily specific learning disabilities (70%). Fifty-five percent of respondents indicated that their student had previously been on an IEP. With two exceptions, children from responding parents did not receive any free/reduced lunch support (90%). All 20 responding parents indicated that their students currently attended CRLS. Of those, three parents indicated that they also had a student at the elementary level. Table 3 below shows the demographic breakdown of responses.

The survey was intended to solicit information on parent experiences and understanding of Section 504. The survey was organized into two main sections: 504 Accommodation Plans (7 items) and Communication with District and School Teachers and Administrators (7 items). The use of a four-point Likert-type scale was developed to measure, in part, the perceptions of parents about the 504 services their child had received and their involvement in the

process. The use of a Likert scale brought a quantitative component to the review in that respondents were asked to select one of four possible responses to each of a total of 14 affirmative statements. Rating choices were as follows: 1= Strongly Disagree, 2 = Disagree, 3 = Agree, 4 = Strongly Agree. A sample survey is included in Appendix C.

In addition to demographic information, the survey also contained two open-ended questions: the first asked parents to list the accommodations in their child's 504 Accommodation Plan and the second asked parents for suggestions for strengthening/improving 504 processes, policies and procedures in Cambridge. These responses were analyzed using standard qualitative analysis procedures (Miles & Huberman, 1994).

Table 3 Breakdown of Parent Survey Responses by School, Disability, Ethnicity, Grade Level, IEP Status and Free/Reduced Lunch Support

		Number	Percent
School / Level	PK-8	3	15 ²
	9-12	20	100
Disability	SLD	14	70
	ED	3	15
	Other	3	15
Race	White not Hispanic	16	80
	Black not Hispanic	2	10
	Asian/Pacific Islander	2	10
Prior IEP	Yes	11	55
	No	7	35
	Don't Know	2	10
Free / Reduced Lunch	Free	1	5
	Reduced	1	5
	No assistance	18	90

² All 20 responding parents indicated that their students currently attended CRLS. Of those, three parents indicated that they also had a student at the elementary level.

Quantitative Data

Quantitative survey data were analyzed using descriptive statistics. For each survey item, the mean rating on the four-point scale and the percentage of total responses were computed for each item value. Ratings of a 3 or 4 were combined for an overall percent agreement. Table 4 below summarizes the quantitative survey results from the 504 parent survey.

Regarding 504 Accommodation Plans, parent survey results indicate that 90% of responding parents agreed or agreed strongly that their child's teacher had received a copy of their child's 504 Accommodation Plan and 75% agreed or agreed strongly that their child's teacher understands their child's needs for accommodations and that they were treated as an "equal partner" with school personnel in decision-making. Sixty-eight percent of respondents agreed or agreed strongly that their child's school is providing all of the accommodations on their child's 504 Plan and 63% agreed that they were confident that the 504 Plan was being implemented as written. Forty-seven percent of respondents agreed or agreed strongly that they were invited to a meeting at the school to review the 504 Accommodation Plan and 35% agreed that their child's principal was knowledgeable about their child's 504 Plan.

In terms of communication with school personnel, most responding parents agreed or strongly agreed that they regularly communicate with teachers, know who to contact with questions or concerns and understand the differences between Section 504 and the IDEA. While 61% of parents agreed that they had received information about their rights under Section 504, a slightly lower percentage of parents agreed that they understood those rights (58%).

Qualitative Data

Qualitative survey data were transcribed verbatim from the returned surveys; WestEd evaluators then coded responses into categories that emerged from the totality of the responses. Most responses to the two open-ended survey questions were two to three sentences in length. Open-ended responses were categorized, coded and counted by category and summarized into themes for each of the two questions.

Regarding the types of accommodations that parents reported were included in their child's 504 Accommodation Plan, responses fell into two main categories: (1) accommodations made for educational or instructional purposes and (2) accommodations made for health or medical reasons. The majority of responses fell into the educational/instructional category.

Table 4 Cambridge 504 Parent Survey – Mean Ratings of Items and Corresponding Percentage of Items rated Agree or Strongly Agree

Item	Mean Rating	% Agree
504 Accommodation Plans		
1. My child's teacher has a copy of the 504 Accommodation Plan.	3.4	90%
2. My child's teacher understands my child's needs for accommodations.	3.0	75%
3. My child's school provides all of the accommodations documented on my child's 504 Accommodation Plan.	2.74	68.42%
4. I feel confident that my child's 504 Plan is being implemented as written.	2.68	63.16%
5. I am included as an equal partner with school personnel in decision-making about my child's program.	2.85	75%
6. I was invited to a meeting at the school to review/revise my child's 504 Accommodation Plan	2.53	47.37%
7. The principal at my child's school is knowledgeable about my child's 504 Accommodation Plan.	2.29	35.29%

Note: Ratings are on a scale of 1-4. 1=Strongly Disagree, 2=Disagree, 3=Agree, 4=Strongly Agree

Item	Mean Rating	% Agree
Communication with District and School Teachers and Administrators		
1. I regularly communicate with my child's teachers.	3.32	78.95%
2. I know who the 504 Coordinator is at my school.	2.74	68.42%
3. If I have questions about my child's program or services, I know who to call.	3.00	73.68%
4. Administrators at the Cambridge Public Schools Central Office are accessible to me and responsive to my requests for information.	2.76	70.59%
5. I received information about my rights as a parent of a child protected under Section 504.	2.67	61.11%
6. I understand my rights as a parent of a child protected under Section 504.	2.53	57.89%
7. I understand the differences between Section 504 and the IDEA (Special Education).	2.74	73.68%

One parent indicated that (s)he didn't know what accommodations were listed because a written plan was never received.

Examples of the most commonly reported types of educational/instructional accommodations included:

- Extended time on tests or assignments
- Preferential seating
- Direct services, e.g., 1:1 tutoring
- "Check-ins" with a teacher or other adult regarding assignments
- Books on tape
- Dictation
- Assistive technology, e.g., a word processor or computer for written assignments
- Communication protocols between home and school

Examples of the most commonly reported types of accommodations made for health-related or medical reasons included:

- Breaks during the school day, as needed
- No penalty for frequent absences due to illness
- Assignments sent home by tutor(s) if student is absent
- Access to cell phone to contact parent during the school day

Regarding suggestions for strengthening/improving the 504 processes, policies and procedures in Cambridge, responses fell into two main categories: (1) suggestions for changes at the district level and (2) suggestions for changes at the school building level.

Summary of suggestions for changes at the District Level

- Create a centralized database
- Use a standardized 504 Accommodation Plan form
- Give the Office of Special Education (OSE) responsibility for 504
- Publish information, policies and procedures about Section 504
- Provide professional development for staff
- Provide information for parents
- Include direct instruction on "executive functioning," organization and time management as part of the district-wide curriculum beginning in elementary-middle school

Summary of Suggestions for Changes at the School Building Level

- Improve ongoing communication between the school and parents
- Include parents as part of the 504 team; work in partnership with parents
- Convene 504 team meetings with parents where all relevant staff are present
- Improve teacher/staff attitudes about 504: responsibility, responsiveness, understanding of particular disabilities and their impact on classroom performance
- Improve timely transition planning
- Use online homework listing: Edline
- Establish a “homework center” or resource/learning center at CRLS for support with assignment completion, organization and time management

Summary of Findings Related to Evaluation Questions

This 504 Review addressed the following four over-arching Evaluation Questions as requested by the district:

- (1) How are 504 plans determined, written, monitored, and implemented?
- (2) Who is responsible for writing 504 plans at each school?
- (3) To what degree are 504 policies and procedures implemented consistently across schools in the district?
- (4) Recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools.

A summary of WestEd findings related to each evaluation question are described below.

Evaluation Question #1: How are 504 Plans Determined, Written, Monitored, and Implemented?

Findings: What *is* the 504 System in Cambridge?

WestEd conducted interviews and focus groups with administrators both at the Central Office and building level, teachers, guidance staff and other related services staff and parents. A total of 28 CPS staff were interviewed either individually or in a small group. In addition, parent focus groups included a total of 18 participants. The following description reflects what WestEd learned from this collective response.

Variability

It was consistently reported that there is a great deal of variability across and sometimes within schools in terms of how 504 processes and procedures are carried out. While there are district-level policies and guidelines (see Appendix D for a review of district-submitted documents) apparently these are either not well-communicated to building level staff, are not well understood or simply ignored.

Central Office – Role of the 504 Coordinator

At the CPS Central Office, the Affirmative Action Officer has responsibility for 504 oversight. However, there is no centralized database of 504 protected students, nor is a centralized file maintained (paper or electronic) of current/active 504 Accommodation Plans. While there is a staff member assigned to input 504 student information at the high school, there is no one assigned to this task at the elementary-middle school level. Currently, the database maintained at CRLS enables the disaggregation of 504 student data, however, this is not possible for students at the elementary-middle school level since data is not entered into the Management Information System (MIS).

The Central Office's role is to receive and respond to parent concerns/questions, mediate disagreements between parents and schools with regard to 504 issues, and to promulgate district-wide policies and procedures. The ability of the Central Office to direct 504 processes at the building level appears questionable. For example, it was not possible for the Affirmative Action Officer to obtain an accurate mailing list of 504 parents from each elementary-middle school building. Depending upon each school to disseminate information about 504 to parents (e.g., the invitation to the parent focus groups) seems to be an unreliable and ineffective arrangement. Due to the lack of a centralized database and the variability in response across schools PK-8, parents who need to know and are entitled

to information may not be receiving it. This could explain, in part, the low levels of participation, particularly from the elementary-middle school level, in parent focus groups and the parent survey.

Recently, a part time 504 Coordinator position at the high school has improved coordination of 504 processes at CRLS. At the elementary-middle school level, principals are primarily responsible for ensuring that 504 Accommodation Plans are developed and implemented, however, the degree of oversight varies from building to building and appears to be dependent upon the degree to which the particular principal understands and accepts supervision and coordination of 504 as a responsibility.

Policies and Procedures

The document review indicated that there are written district-level and CRLS policies and guidelines for staff, students and parents related to Section 504. Guidelines clearly identify who is responsible for 504 at CRLS and at the Central Office level. CRLS has a consistently used 504 Accommodation Plan. There is a Cambridge School Department Student Accommodation Plan form to be used at the elementary-middle school level. (See Appendix D.) However, the degree to which these policies and procedures are clearly understood by staff, students and parents is questionable, based upon interviews with administrators and staff. Parent surveys indicated that a slight majority of parent respondents had received (61% agreed) and understood (58% agreed) their rights as parents under section 504.

Students Served

Information on numbers of students served in the district indicated that there are an estimated 150 students currently on 504 Plans. Many school and district-level respondents, however, indicated that they did not know or it was not known exactly how many 504 students are currently being served in Cambridge. There is no centralized database on 504 protected students maintained at the CPS Central Office, nor are Section 504 Plans routinely submitted to the Affirmative Action Officer for review and/or record keeping. There is no requirement that all 504 Plans be submitted to the Central Office or even that directory and demographic information is reported centrally. At CRLS the designated 504 Coordinator keeps a record of all 504 identified students served at the high school, grades 9-12. CRLS maintains a database on 504 protected students 9-12. This is not done at the elementary-middle school level.

CRLS student data reveal that of the 121 students reported in October, 2010, White students are somewhat over-represented by comparison to the overall school population. A slight

majority are male. Sixty-nine percent of 504 protected students are receiving no support via the Free and Reduced School Lunch Program compared to 53.6% at CRLS where 46.4% of CRLS students overall are classified as low income (MA Department of Elementary and Secondary Education, 2010). This is an indication that the group of 504 students served at CRLS is somewhat more affluent than the overall student population. A database on individual students is not maintained at the elementary-middle school levels.

A review of a selection of 16 redacted individual student 504 Accommodation Plans across six different schools showed that a larger percentage of students were identified as students with specific learning disabilities (38%) than in other categories. Other disabilities included Attention Deficit Disorder, emotional disabilities, communication disorders and health-related (e.g., allergies). Four out of 16 plans (25%) indicated that the student had previously been on an IEP prior to the transition to high school.

Professional Development

Interview respondents noted that they have received some professional development on the legal requirements of 504 but would like more specific training on the mechanics of writing a 504 Accommodation Plan, guidelines and protocols; in other words, the “how” of developing and implementing Section 504. Interviews revealed that there is confusion and/or misinformation on the part of school staff about the differences between Section 504 and the IDEA in terms of what is required under each statute and the differences in entitlement and protections afforded students and parents.

Evaluation Question #2: Who is Responsible for Writing 504 Plans at Each School?

Findings

Responsibilities for 504 are clearly defined in guidelines documents from CRLS. *CRLS Guidelines for Reviewing 504s* indicate that the guidance counselor for the student is responsible for the review and writing of 504 Plans. *The CRLS Process for Monitoring 504 Plans* places responsibility with the CRLS 504 Coordinator for sending plans to teachers. The *CRLS School Handbook* indicates that referrals for 504 Accommodation Plans should be made to the guidance counselor.

Responsibility for 504 at the elementary-middle school level is less clear. The *CPS Guide to Policies for Students and Parents* states that “requests for Section 504 accommodations...can be made directly to the 504 Coordinator at the student’s school” (p.12) but does not indicate who the 504 Coordinator is. (See Appendix D.)

When asked, “Who is responsible for 504 ?” interview responses at the building level varied from the building principal, to the 504 Coordinator, to the guidance counselor, to the Assistant Principal, or to the Learning Community at CRLS. Comments such as “It’s unclear who is responsible...” or “It’s a gray area...” were a theme. According to interviews with administrators and guidance staff, at CRLS responsibility for developing 504 plans rests primarily with the guidance counselor assigned to the individual student. This is consistent with CRLS guidelines, as described above. The part time CRLS 504 Coordinator keeps a file on all 504 Plans and ensures that the student’s teachers receive copies. For the most part, at the elementary level, respondents indicated that it is the principal’s duty to actually write the 504 Accommodation Plan.

Most interviewees were clear that 504 was not a special education responsibility, rather it was described as a “regular education initiative.” The exception to this distinction was at the High School Extension Program (HSEP) where there is a single special educator who also deals with 504 protected students, to the degree that the school is aware of or notified of them.

Interviewees at the elementary level indicated that there is no designated 504 case manager assigned to each student. Parents also reported that responsibility varies school to school. Interviews with Central Office administrators indicated that at the elementary level the principal is responsible for 504 plans.

Evaluation Question #3: To What Degree are 504 Policies and Procedures Implemented Consistently Across Schools in the District?

Findings

Interviews, focus groups, and survey responses with district and building level administrators, staff and parents indicate that variability is the rule rather than the exception across the district. See the description of 504 processes above under Evaluation Question #1.

Forms

CRLS uses a consistent 504 Accommodation Plan form. For the elementary-middle school level, there is a district-developed document entitled *The Cambridge School Department Student Accommodation Plan*, but it is not required to be used consistently at the elementary-middle school level. Rather, individual schools adapt the plan to reflect building-based differences. Two examples of elementary 504 forms were provided for the

WestEd review. Forms request information regarding the student's disability, the degree to which the disability impacts a "major life activity" and list accommodations and/or services. Plans require a parent signature and either the signature of the principal (elementary), the "school department" or the CRLS Dean and guidance counselor.

Record Keeping

Again, this responsibility varies. At the high school, the 504 Coordinator keeps a notebook on all 504 Accommodation Plans. At the elementary-middle school level, this is unclear. It is clear that there is no centralized record keeping for students PK-12 throughout the district. It is unclear whether 504 Accommodation Plans are considered to be part of the student's permanent educational record.

Evaluation Question #3: Recommendations for Improving/Strengthening the 504 Process for Students with Disabilities Served in Cambridge Public Schools.

WestEd recommendations for improving the system:

District Level

Central Office Administration

- Develop, maintain and keep up-to-date a centralized database for students protected under Section 504 that can be disaggregated by grade, school, disability, ethnicity, etc. Include full contact information on parents. Report on an annual basis. Track the degree to which there may be over or under representation of children from minority groups or lower SES levels.
- Identify the resource implications for addressing the needs of 504 protected students and plan for the development of the necessary infrastructure, e.g., a data entry clerk for keeping track of 504 protected students or specific services that 504 students may receive. It may be necessary to create a specific budget line item for 504 staff and/or student services.
- Develop and consistently use a standardized 504 Accommodation Plan form at both the elementary and high school levels.
- Clarify 504 policies and procedures at the elementary and high school levels; develop written guidelines for schools to operationalize 504 procedures including how 504 Plans are supervised/monitored.
- Develop clear procedures for transition planning for students who move from grade to grade as well as school to school. This is especially important for students transitioning from the middle to high school level.

Roles and Responsibilities

- Clarify the relationship, roles and responsibilities between the Central Office and individual schools for students protected under Section 504.
- Give accountability and authority to the Central Office 504 Coordinator to ensure that 504 procedures are consistently implemented at the building level.
- Given the current administrative structure at the CPS Central Office, review which Central Office position or department is most appropriate for 504 supervision and management.
- Begin to think less categorically about 504/special ed./Title I and other support services and programs. Explore the possibility of structuring positions in flexible ways so that there is a more integrated/coordinated approach to supporting students across general and special education across schools in the district.

Professional Development

- Provide district-wide annual training to all building administrators on 504 responsibilities, policies and procedures including the differences between Section 504 and the IDEA, how to make a 504 referral, etc.
- Provide professional development and support to teachers and building staff implementing 504 plans including exemplars of an appropriate 504 Team, what constitutes an appropriate 504 evaluation, problem solving and planning processes, exemplars of an appropriate 504 Accommodation Plan, etc.


Communication with Parents

- Conduct outreach activities for parents, particularly for under-served or hard to reach populations so that parents are aware of 504 policies, procedures, and practices.
- Develop parent-friendly brochures or guidebooks that explain 504 and special education policies, procedures and practices and parent rights. Disseminate this widely through web-based and direct mailing processes.
- Partner/collaborate with the Cambridge Parent Advisory Council (C-PAC) to inform and educate parents about roles, rights and responsibilities related to Section 504 and/or consider establishing a parent advisory committee for parents of 504 protected students.

Building Level

- Clarify roles and responsibilities for 504 at the building level, including the role of the building principal, guidance or other support staff.
- Establish procedures for 504 recording keeping within each building.

- Determine how data on 504 students will be maintained and transferred to the Central Office.
- Establish a process for assigning “case manager” responsibility for each 504 protected student at the building level. This may vary based on the nature of the child’s disability. For example, for a medical or health-related disability, the case manager might appropriately be the school nurse. For an educational/learning disability, the appropriate case manager might be a special educator or guidance counselor.
- Strengthen and utilize the Teacher Assistance Team (TAT) structure as a vehicle for collaborative problem solving between teachers to address concerns related to individual students including but not limited to students who may have a disability and require 504 accommodations.
- Involve regular classroom teachers in the development and review of 504 Plans for individual students.
- Ensure that all relevant personnel are aware of individual student 504 accommodations including substitute teachers, paraeducators, and other personnel who need to know, depending on the nature of the child’s disability.
- Provide training and/or consultation to teachers and other staff in implementation 504 Accommodation Plans for individual students; e.g. training on the nature of the child’s disability, its educational or behavioral impact, and how to implement the required accommodations, etc.
- At CRLS, consider establishing a resource room or study skills center to which students can be scheduled for “check-ins” and support on organizational and time management skills. This should be available to any student regardless of whether or not they have a documented disability and are on a 504 Plan or IEP.



Themes and Reflections – A Call for Consistency, Responsiveness, and Transparency

The WestEd review of 504 processes, policies and procedures in the Cambridge Public Schools has shown that while students with disabilities who are protected under Section 504 of the Rehabilitation Act are being identified and provided with accommodations according to an individually developed 504 Accommodation Plan, it is clear that there is no consistent process of implementation that covers all schools in the district. Cambridge Rindge and Latin (CRLS), the high school, has made recent progress by designating a 504 Coordinator, albeit part time, using a standard 504 Plan and keeping track of all identified 504 students.

CRLS has also experienced a recent increase in the numbers of referred 504 students which is perceived by some respondents as a trend to reduce child count in special education by finding children ineligible and then reverting to a 504 Plan for accommodations. The degree to which this trend is real and/or if it is appropriate cannot be determined from the data provided in this review. Further analysis of individual student data, disaggregated by sending elementary-middle school would need to be conducted. Suffice it to say that a Section 504 Accommodation Plan is perceived by many parents to be a benefit and added protection which might be used to leverage support for individual students whether or not the student had been previously served in special education. Decisions about student eligibility for either special education or 504 Accommodation Plans must be made on an

individual case basis.

Parent views of the 504 process are mixed. Focus groups with parents revealed a great deal of dissatisfaction with the level of support their students were receiving, the length of time that it took to get the 504 Plan developed and “in place” and the degree to which they needed to initiate communication with the school, often described as “fighting” the system to get what they perceive as an entitlement. The parent survey showed more positive results with the majority of parents reporting that they had received their child’s 504 Plan and felt that they were an “equal partner” with school personnel in planning their child’s program. However, less than half of responding parents reported that they had been invited to a meeting at the school to discuss or review the 504 Plan. Survey responses also indicated that approximately two-thirds of responding parents reported that they communicated regularly with their child’s teachers, know who to call if there is a problem, that the Central Office is responsive to their requests for information and that they understand the differences between Section 504 and the IDEA.

The Cambridge Public Schools could improve and strengthen the 504 process by increasing consistency across the district, improving responsiveness to parent input, questions and concerns, and by making the 504 process transparent to all stakeholders, from administrators, to teachers, to other school staff and, especially, to parents.

See Appendix F for a summary of themes and corresponding recommendations.

Limitations

The conclusions of this review should be considered in light of the following limitations:

- Low response rate for the parent survey (13%)
- Low participation in parent focus groups (12%)
- Limited nature of the parent focus groups, particularly in terms of the demographic composition of the parent participants
- Limited data available on numbers and types of students served
- Limited selection/sample of individual 504 Accommodation Plans (11%)

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Appendix A

WestEd Evaluation Team Biographies

Kristin Reedy was the WestEd Project Director for the Cambridge 504 Review. Kristin is the director of Learning Innovations' federally funded Northeast Regional Resource Center (NERRC) and has extensive experience in state and local special education policy and program implementation. Other areas of expertise and interest include special education reform, special education policy, program evaluation, finance, regular education reform, and early childhood special education. Kristin has over 25 years of experience in special education as a classroom teacher, consultant, and administrator. Prior to joining WestEd, she served as a consultant and manager at the Vermont Department of Education where she was interim Chief of the Special Education Unit, coordinator for 619 Preschool Special Education and established the foundation for the Vermont's Early Intervention/Birth to Three Program (then Part H). She has also served at the local level as the Director of Special Services for two Vermont school districts which included responsibility for special education, Section 504, and Title I. Kristin has led special education program evaluation projects in selected school districts across the region. She has also been the co-director for the annual MA Special Education Leadership Academy 2004-2010, funded by the Massachusetts Department of Elementary and Secondary Education (MADESE). Kristin holds a doctorate in educational leadership and policy studies from the University of Vermont.

Vicki Hornus was the second primary WestEd Evaluator for the 504 Review. A Senior Program Associate with the Northeast Regional Resource Center and Learning Innovations at WestEd, Vicki is a career special educator with particular expertise in the area of Focused Monitoring. Vicki has led NERRC's State-to-Local Monitoring Work Group for Parts B and C and, in collaboration with the National Center on Special Education Accountability Monitoring (NCSEAM), has consulted with the majority of states in the northeast region in establishing their focused monitoring systems. Vicki brings experience from an extensive career in special education as a local-level administrator (Springfield and Burlington, VT), an elementary school counselor and has worked at the national, regional, state, and local levels as state agency staff and as a local special education director, teacher, and consultant. She served at the Vermont Department of Education as the Special Projects Coordinator for the State's special education reform initiative. She has experience in higher education, teaching Educational Psychology and Child Development at Miami University and Hudson Valley Community College. For the past six years, she has co-directed the annual MA Special Education Leadership Academy 2004-2010, funded by MADESE. She has also co-directed special education program evaluations in sites across the region. Vicki's educational background includes a B.A. in Elementary and Special Education from Purdue University, an M.S. in School Psychology from Miami University, and numerous courses in administration from the University of Vermont.

Appendix B

Examples of Interview and Focus Group Protocols

CAMBRIDGE 504 INTERVIEW PROTOCOL -- Central Office

Please describe your role/job and responsibilities in Cambridge. How long have you been in the district?

Intro: As you know, the CPS School Committee has contracted with Learning Innovations at WestEd to conduct a review of Section 504 processes, policies, and procedures in Cambridge.

Here are the evaluation questions that we have been asked to address:

1. How are 504 plans determined, written, monitored, and implemented?
2. Who is responsible for writing 504 plans at each school?
3. To what degree are 504 policies and procedures implemented consistently across schools in the district?
4. Recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools.

Interview Questions:

1. Describe how the 504 process is managed in the district, overall. Probes:
 - a. Who is the district's 504 coordinator?
 - b. Who is responsible for writing 504 plans in the schools in the district?
 - c. If a parent wants to make a 504 referral what do they do?
 - d. To whom to 504 referrals go when they are received?
 - e. By what processes are parents informed of their rights and procedural safeguards under Section 504?
 - f. If a parent calls the Central Office and indicates that their child may have a disability, what are they told to do next?
 - g. Describe the process from referral through evaluation, eligibility determination and development and review of a 504 accommodation plan.
2. To what extent do you believe that 504 procedures and services for students with disabilities are equitable across all schools in the district?
3. What professional development have principals, teachers, or other school staff received re: Section 504?
4. What policies or practices need to change at the district level to better serve students with disabilities protected under Section 504?
5. What is your understanding of the differences between Section 504 and the IDEA?
6. What are your recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools?
7. Has the district ever had a 504 OCR complaint or investigation? If so what was the outcome?
8. Is there anything you'd like to add that I haven't asked you?

CAMBRIDGE 504 INTERVIEW PROTOCOL -- Central Office Affirmative Action 504 Coordinator

Please describe your role/job and responsibilities in Cambridge. How long have you been in the district?

Intro: As you know, the CPS School Committee has contracted with Learning Innovations at WestEd to conduct a review of Section 504 processes, policies, and procedures in Cambridge.

Here are the evaluation questions that we have been asked to address:

1. How are 504 plans determined, written, monitored, and implemented?
2. Who is responsible for writing 504 plans at each school?
3. To what degree are 504 policies and procedures implemented consistently across schools in the district?
4. Recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools.

Interview Questions:

1. Describe how the 504 process is managed in the district, overall. Probes:
 - a. Who is the district's 504 coordinator?
 - b. Who is responsible for writing 504 plans in the schools in the district?
 - c. If a parent wants to make a 504 referral what do they do?
 - d. To whom do 504 referrals go when they are received?
 - e. By what processes are parents informed of their rights and procedural safeguards under Section 504?
 - f. If a parent calls the Central Office and indicates that their child may have a disability, what are they told to do next?
 - g. Describe the process from referral through evaluation, eligibility determination and development and review of a 504 accommodation plan.
2. To what extent do you believe that 504 procedures and services for students with disabilities are equitable across all schools in the district?
3. What professional development have principals, teachers, or other school staff received re: Section 504?
4. What policies or practices need to change at the district level to better serve students with disabilities protected under Section 504?
5. What is your understanding of the differences between Section 504 and the IDEA?
6. What are your recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools?
7. Has the district ever had a 504 OCR complaint or investigation? If so what was the outcome?
8. Is there anything you'd like to add that I haven't asked you?

CAMBRIDGE 504 FOCUS GROUP and INTERVIEW PROTOCOL PRINCIPAL and Building Administrators

As you know, the CPS School Committee has contracted with Learning Innovations at WestEd to conduct a review of Section 504 processes, policies, and procedures in Cambridge.

Here are the evaluation questions that we have been asked to address:

1. How are 504 plans determined, written, monitored, and implemented?
2. Who is responsible for writing 504 plans at each school?
3. To what degree are 504 policies and procedures implemented consistently across schools in the district?
4. Recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools.

Focus Group/Interview Questions:

5. Describe how the 504 process is managed in your school. Probes:
 - h. Who is your school's 504 coordinator?
 - i. Who is responsible for writing 504 plans in your school?
 - j. If a parent wants to make a referral what do they do?
 - k. By what processes are parents informed of their rights and procedural safeguards under Section 504?
 - l. To whom do 504 referrals go?
 - m. Describe your process from referral through evaluation, eligibility determination, placement and development and review of a 504 accommodation plan. Give an example of a 504 case that you have managed.
6. To what extent do you believe that 504 procedures and services for students with disabilities are equitable across all schools in the district?
7. What policies or practices need to change at the district level to better serve students with disabilities protected under Section 504?
8. What professional development have you received or has been made available to you regarding Section 504 and your responsibilities related to implementation.
9. What is your understanding of the differences between Section 504 and the IDEA?
10. What are your recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools?
11. Is there anything you'd like to add that I haven't asked you?

CAMBRIDGE 504 FOCUS GROUP PROTOCOL – Parents

Intro: As you know, the CPS School Committee has contracted with Learning Innovations at WestEd to conduct a review of Section 504 processes, policies, and procedures in Cambridge. Talk about confidentiality of our notes as well as on behalf of the group.

Here are the evaluation questions that we have been asked to address:

1. How are 504 plans determined, written, monitored, and implemented?
2. Who is responsible for writing 504 plans at each school?
3. To what degree are 504 policies and procedures implemented consistently across schools in the district?
4. Recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools.

Please introduce yourself and why you decided to participate in this focus group today?

Focus Group Questions:

5. Describe your understanding how the 504 process is managed in your school. Probes:
 - n. Who is the school's 504 coordinator?
 - o. Who is responsible for writing 504 plans in your school?
 - p. If you heard of a parent of a child in your school indicated to you that their child may have a disability, what would you do or advise them to do?
 - q. To whom to 504 referrals go when they are received?
 - r. How are parents informed about their rights and procedural safeguards under Section 504?
6. Does your child have a 504 plan?
7. If so, please describe how the process from referral to evaluation to development of the 504 plan "worked" for you?
8. To what extent do you believe that 504 procedures and services for students with disabilities are equitable across all schools in the district?
9. What policies or practices need to change at the district level to better serve students with disabilities protected under Section 504?
10. What is your understanding of the differences between Section 504 and the IDEA?
11. What are your recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools?
12. Is there anything you'd like to add that I haven't asked you?

CAMBRIDGE 504 FOCUS GROUP PROTOCOL – Parents

Intro: As you know, the CPS School Committee has contracted with Learning Innovations at WestEd to conduct a review of Section 504 processes, policies, and procedures in Cambridge. As part of the review, WestEd would like to hear from the parents of children who are protected under Section 504 of the Rehabilitation Act and who are receiving accommodations as described in a 504 Accommodation Plan. We want to learn more about your perceptions of the accommodations that your child has received and about your communication and involvement with the school district in the implementation of your child's 504 Accommodation Plan. One of the ways we are getting input from parents is through the Parent Survey that was mailed to every parent of a 504 protected student on Oct. 19, 2010 from the CPS Central Office. If you haven't already done so, please respond to the survey and send it back in the self-addressed stamped envelope. The surveys will come to the WestEd office in Williston, Vt. Surveys are due November **12, 2010**.

This focus group will inform our overall review of Cambridge 504 processes and procedures. Your feedback tonight will be summarized with all the other information we have collected in our report to the district. No personally identifiable information will be shared with the district. Our notes from this meeting will be the property of WestEd and not shared with the district. Because some child-specific information may be shared here tonight, we ask you to protect the privacy and confidentiality of each other and not to share personally identifiable information with others outside this group.

Here are the evaluation questions that we have been asked to address in our review:

1. How are 504 plans determined, written, monitored, and implemented?
2. Who is responsible for writing 504 plans at each school?
3. To what degree are 504 policies and procedures implemented consistently across schools in the district?
4. Recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools.

Focus Group Questions:

5. **Please describe/share the experience you have had as a parent of a student protected under Section 504 of the Rehabilitation Act.**
6. **What are your recommendations for improving Section 504 process in Cambridge Public Schools, at the district-level? What advice would you give the district?**
7. **What recommendations do you have for improving the 504 process at the school building level?**

Thank you very much for your participation in this focus group. We very much value your input and appreciate the advice you have given regarding Section 504 process in Cambridge.

CAMBRIDGE 504 INTERVIEW PROTOCOL – Teachers

Please describe your role/job and responsibilities in Cambridge. How long have you been in the district?

Intro: As you know, the CPS School Committee has contracted with Learning Innovations at WestEd to conduct a review of Section 504 processes, policies, and procedures in Cambridge.

Here are the evaluation questions that we have been asked to address:

1. How are 504 plans determined, written, monitored, and implemented?
2. Who is responsible for writing 504 plans at each school?
3. To what degree are 504 policies and procedures implemented consistently across schools in the district?
4. Recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools.

Focus Group/Interview Questions:

5. Have you ever had or do you currently have one or more students with disabilities who are protected under Section 504 in your classroom/on your case load?
6. If yes, what do you perceive as your responsibilities related to implementation of the student's 504 plan? Accommodations?
7. Describe how the 504 process is managed in your school. Probes:
 - s. Who is the school's 504 coordinator?
 - t. Who is responsible for writing 504 plans in your school?
 - u. If a parent of a child in your class indicated to you that their child may have a disability, what would you do or advise them to do?
 - v. To whom do 504 referrals go when they are received?
 - w. By what processes are parents informed of their rights and procedural safeguards under Section 504?
 - x. Based on your experience, describe the 504 process from referral through evaluation, eligibility determination and development and review of a 504 accommodation plan.
8. Describe or give an example of a 504 accommodation plan that you have implemented.
9. To what extent do you believe that 504 procedures and services for students with disabilities are equitable across all schools in the district?
10. What professional development have you received re: Section 504?
11. What policies or practices need to change at the district level to better serve students with disabilities protected under Section 504?
12. What is your understanding of the differences between Section 504 and the IDEA?
13. What are your recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools?
14. Is there anything you'd like to add that I haven't asked you?

Appendix C

Parent Survey and Cover Letter

Cambridge Public Schools

Section 504 Review 2010

Parent Survey



October 28, 2010

Dear Parents and Caregivers:

As you may already be aware, the **Cambridge Public Schools** contracted with WestEd, an independent consulting group, to conduct a review of the Section 504 processes, policies and procedures in Cambridge. This review is expected to be completed by December 2010.

Here are the evaluation questions that we have been asked to address:

1. How are 504 plans determined, written, monitored, and implemented?
2. Who is responsible for writing 504 plans at each school?
3. To what degree are 504 policies and procedures implemented consistently across schools in the district?
4. Recommendations for improving/strengthening the 504 process for students with disabilities served in Cambridge Public Schools.

As part of the review, WestEd would like to hear from the parents of children who are protected under Section 504 of the Rehabilitation Act and who are receiving accommodations as described in a 504 Accommodation Plan. We want to learn more about your perceptions of the accommodations that your child has received and about your communication and involvement with the school district in the implementation of your child's 504 Accommodation Plan. As part of this project, we are conducting this short survey. If you have more than one child on a 504 Accommodation Plan you can base your responses on your overall experience with all of those children.

Please fill in your responses and, using the self-addressed stamped envelope provided, mail the survey back to our offices in Williston, Vermont by Friday November 12, 2010.

It should take you about 10 minutes to complete this survey.

It is important for you to know that your participation in this survey is completely voluntary and you may skip any items to which you do not want to respond. Please also note that your privacy is very important to us. No individual responses will be shared with the Cambridge Public Schools. Survey responses will be the property of WestEd. Your responses will be summarized with all other responses so we can provide results to the district. No personally identifiable information will be shared with the district. Your responses will remain completely confidential.

If you need the survey to be translated into another language, please contact me at Kreedy@wested.org or 802-951-8218.

Thanks very much!

Sincerely,
Kristin Reedy, Ed.D.
Learning Innovations WestEd

Cambridge Public Schools

Section 504 Review 2010

Parent Survey



Dear Parents and Caregivers:

As you may already be aware, the **Cambridge Public Schools** contracted with WestEd, an independent consulting group, to conduct a review of the Section 504 processes, policies and procedures in Cambridge. This review is expected to be completed by December 2010.

As part of the review, WestEd would like to hear from the parents of children who are protected under Section 504 of the Rehabilitation Act and who are receiving accommodations as described in a 504 Accommodation Plan. We want to learn more about your perceptions of the accommodations that your child has received and about your communication and involvement with the school district in the implementation of your child's 504 Accommodation Plan. As part of this project, we are conducting this short survey. If you have more than one child on a 504 Accommodation Plan you can base your responses on your overall experience with all of those children.

Please fill in your responses and, using the self-addressed stamped envelope provided, mail the survey back to our offices in Williston, Vermont by Friday November 12, 2010. It should take you about 10 minutes to complete this survey.

It is important for you to know that your participation in this survey is completely voluntary and you may skip any items to which you do not want to respond. Please also note that your privacy is very important to us. No individual responses will be shared with the Cambridge Public Schools. Survey responses will be the property of WestEd. Your responses will be summarized with all other responses so we can provide results to the district. No personally identifiable information will be shared with the district. Your responses will remain completely confidential. If you need the survey to be translated into another language, please contact me at kreedy@wested.org or 802-951-8218.

Thanks very much!

.....

What schools does your child attend?

- | | | | | |
|--------------------------------|---|-------------------------------------|---|--------------------------------------|
| <input type="radio"/> Amigos | <input type="radio"/> Baldwin | <input type="radio"/> Cambridgeport | <input type="radio"/> Fletcher-Maynard | <input type="radio"/> Graham & Parks |
| <input type="radio"/> Haggerty | <input type="radio"/> Kenney-Longfellow | <input type="radio"/> King Open | <input type="radio"/> Martin Luther King | <input type="radio"/> Morse |
| <input type="radio"/> Peabody | <input type="radio"/> Tobin | <input type="radio"/> CRLS | <input type="radio"/> High School Extension Program | |

Please indicate your child's grade level.

- ☐ Pre-Kindergarten ☐ K-8 ☐ 9-12

Was your child previously on an IEP for special education services?

- ☐ Yes ☐ No ☐ Don't Know

Does your child receive support for lunch?

- ☐ Free ☐ Reduced ☐ No Assistance

Cambridge Public Schools

Section 504 Review 2010

Parent Survey



What is your child's disability?

- ☐ Specific Learning Disability
 ☐ Sensory Impairment
 ☐ Emotional Disability
 ☐ Developmental Disability
 ☐ Intellectual Disability
☐ Autism
 ☐ Health Impairment
 ☐ Communication
 ☐ Physical
 ☐ Multiple Disabilities

Other (please describe):

What is your child's race/ethnicity?

- ☐ White Not Hispanic
 ☐ Hispanic
 ☐ Black Not Hispanic
 ☐ Asian / Pacific Islander
 ☐ American Indian or Native Alaskan

Other:

Please indicate the degree to which you agree or disagree with the following statements by filling in the circles completely (fill in only one circle for each statement):

504 Accommodation Plans

	1 - Strongly Disagree	2 - Disagree	3 - Agree	4 - Strongly Agree
My child's teacher has a copy of the 504 Accommodation Plan.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
My child's teacher understands my child's needs for accommodations.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
My child's school provides all of the accommodations documented on my child's 504 Accommodation Plan.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I feel confident that my child's 504 Plan is being implemented as it is written.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I am included as an equal partner with school personnel in decision-making about my child's program.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I was invited to a meeting at the school to review/revise my child's 504 Accommodation Plan.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The principal at my child's school is knowledgeable about my child's 504 Accommodation Plan.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Cambridge Public Schools

Section 504 Review 2010

Parent Survey

Communication with District and School Teachers and Administrators

	1 - Strongly Disagree	2 - Disagree	3 - Agree	4 - Strongly Agree
I regularly communicate with my child's teachers.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I know who the 504 Coordinator is at my school.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have questions about my child's program or services, I know who to call.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrators at the Cambridge Public Schools Central Office are accessible to me and responsive to my requests for information.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I received information about my rights as a parent of a child protected under Section 504.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I understand my rights as a parent of a child protected under Section 504.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I understand the differences between Section 504 and the IDEA (special education).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What accommodations are listed in your child's 504 Accommodation Plan? Please List.

**Cambridge Public Schools
Section 504 Review 2010
Parent Survey**



What suggestions do you have for strengthening/improving 504 processes, policies, and procedures in the Cambridge Public Schools?

Please return this survey in the enclosed postage-paid envelope by November 12, 2010.

Kristin Reedy, Ed.D,
Learning Innovations at WestEd
426 Industrial Avenue, Suite 160
Williston, VT 5495
Phone: 802-951-8218
Email: kreedy@wested.org

Thank you for your participation!

(802) 951-8220



Appendix D

List of Documents Reviewed

Type of Document	Document	Comments
MA DESE CPR Report	Cambridge Public Schools Coordinated Program Review (CPR) Report of Findings (2009) http://www.doe.mass.edu/pqa/review/cpr/reports/2009/0049.pdf	Two issues to be addressed re: S. 504: p.32 Student Handbooks and Codes of Conduct; p. 34 Availability of information and academic counseling.
Forms	Cambridge Rindge & Latin (CRLS) Section 504 Accommodation Plan	Plan lists disability category, impact on “major life activity,” accommodations/service and calls for signatures of parent, Dean and Guidance Counselor.
Forms	Cambridge School Department Student Accommodation Plan	Plan calls for description of disability and impact on major life activity, addresses eligibility for special education services, and a description of necessary accommodations. Lists team participants and calls for principal’s signature.
Guidelines	CRLS Writing 504s: Cambridge Rindge and Latin School Process for Writing Chapter 504 Plans	Includes 3 “scenarios” for writing a 504 Plan at CRLS: (1) student terminated from IEP; (2) outside evaluation indicates need for 504; (3) parent requests 504 Plan.
Guidelines	CRLS Guidelines for Reviewing 504s	Annual review. Guidance counselor responsible.
Guidelines	CRLS Process for Monitoring 504 Plans	504 Coordinator sends plans to teachers, verifies by mail, notifies parents, monthly “mass email” to teachers, parents contact Guidance Counselor with concerns who in turn notifies the Dean of Curriculum in relevant subject area(s).

Guidelines	<p>CRLS School Handbook 2010-11 http://www.cpsd.us/CRLS/publications/CRLS_HANDBOOK_2010-11.pdf</p>	<p>p.7 Student Services Indicates that Guidance Counselors “recommend and assist in the TAT evaluation process.”</p> <p>p.9 Assessments “The assessment program at CRLS involves diagnostic testing in the 9th grade...” Further describes “special testing conditions” for students with “documented disabilities.”</p> <p>p.34 Office of Special Education</p> <p>p.34 504 Accommodation Plans Indicates that referral should be made to the guidance counselor. CPS Affirmative Action Officer contact information is listed.</p> <p>p. 62-66 Codes of Conduct— Behavior and Discipline—Students with IEPs/504s</p> <p>References the “Rights and Responsibilities Handbook.” Outlines discipline procedures for students with disabilities on IEP or 504 Plan.</p> <p>p.98 Codes of Conduct—Procedures Pertaining to Discipline of Students with Special Needs</p>
Guidelines	<p>Cambridge Public Schools Guide to Policies for Students and Parents (August 2009)</p>	<p>References the “Rights and Responsibilities Handbook” to be requested from the student’s school.</p> <p>p.2 Notice of Rights under FERPA p.7 Discipline Proceedings (Due Process) p.12 Reasonable Accommodations Policy and Procedure Notice of Rights under Section 504 p.12 Special Education Affirmative Action Policy</p>

Guidelines	Cambridge Public School Guide to Policies-Staff Edition (June 2010)	<p>p.14 Reasonable Accommodations Policy and Procedure</p> <p>Notice of Rights under Section 504 of the Rehabilitation Act of 1973</p> <p>Special Education</p> <p>Affirmative Action Policy</p>
Policy	Cambridge Public Schools Employee Handbook	p. 7 Affirmative Action and Equal Opportunity
Policy	Cambridge Public Schools Non-Discrimination Policy and Prohibition Against Sexual Harassment	Pertains to harassment and discrimination of students and employees. Includes reporting of complaints, p.3.
Policy	Cambridge Public Schools Non-Discrimination on the Basis of Disability (June, 2009)	Pertains to students and staff. References requirements under ADA and Section 504. Indicates that CPS shall inform parents and students of their rights under Section 504.
504 Plans	Selection of 16 individual student 504 plans, personally identifiable information redacted.	<p>14 plans developed K-8</p> <p>2 plans developed at CRLS</p>

Appendix E

Cambridge 504 Compliance Coordinated Program Review 2009 – Issues Summary

<http://www.doe.mass.edu/pqa/review/cpr/reports/2009/0049.pdf>

What was monitored:

- Civil Rights Methods of Administration and Other General Education Requirements (CR)
- Selected federal civil rights requirements, including requirements under Title VI of the Civil Rights Act of 1964, the Equal Educational Opportunities Act of 1974, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, together with selected state requirements under M.G.L. c. 76, Section 5.
- Selected requirements from the Massachusetts Board of Education’s Physical Restraint regulations (603 CMR 46.00).
- Selected requirements from the Massachusetts Board of Education’s Student Learning Time regulations (603 CMR 27.00).
- Various requirements under other federal and state laws.

Issues to be addressed:

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION (CR) AND OTHER RELATED GENERAL EDUCATION REQUIREMENTS V. STUDENT SUPPORT SERVICES
Legal Standard	
CR 10A	<p>Student handbooks and codes of conduct</p> <p>a) The district has a code of conduct for students and one for teachers.</p> <p>b) The principal of every school containing grades 9-12 prepares, in consultation with the school council, a student handbook containing the student code of conduct and distributes it to each student annually, as well as to parents and school personnel; the school council reviews and revises the student code of conduct every year.</p> <p>c) The principal of every school containing other grades distributes the district’s student code of conduct to students, parents, and personnel annually.</p> <p>d) At the request of a parent or student whose primary language is not English, a student handbook or student code of conduct is translated into that language.</p> <p>Student codes of conduct contain:</p> <p>procedures assuring due process in disciplinary proceedings and appropriate procedures for the discipline of students with special needs and students with Section 504 Accommodation Plans.</p>

	Student handbooks and codes of conduct reference M.G.L. c. 76, s. 5 and contain: a nondiscrimination policy that is consistent with M.G.L. c. 76, s. 5, and affirms the school’s non-tolerance for harassment based on race, color, national origin, sex, religion, or sexual orientation, or discrimination on those same bases; the school’s procedure for accepting, investigating and resolving complaints alleging discrimination or harassment; and the disciplinary measures that the school may impose if it determines that harassment or discrimination has occurred. Section 504; G.L. c. 71, § 37H; 603 CMR 26.08	
Rating: Partially Implemented	District Response Required:	Yes
Department of Elementary and Secondary Education Findings:		
The high school’s handbook states that appropriate staff from the district’s Office of Special Education will be involved in disciplinary situations involving students with disabilities but does not include a description of appropriate procedures for the discipline of students with special needs and students with Section 504 Accommodation Plans.		
CRITERION NUMBER		
Legal Standard		
CR 13	Availability of information and academic counseling on general curricular and occupational/vocational opportunities Students from linguistic, racial, and ethnic minorities; males; females; homeless students; and students with disabilities all receive, in grades 7-12, the same information and academic counseling as other students on the full range of general curricular and any occupational/vocational opportunities available to them. Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a), (b); Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.36; Section 504: 29 U.S.C. 794; 34 CFR 104.4, 104.37(b); Title II: 42 U.S.C. 12132; 28 CFR 35.130; NCLB: Title III, Part A, Sec. 3121(c)(1)(C); Title X, Part C, Sec. 721; Mass. Const. amend. art. 114; G.L. c. 71A, § 7; c. 76, § 5; 603 CMR 26.03	
Rating: Partially Implemented	District Response Required:	Yes
Department of Elementary and Secondary Education Findings:		
The district did not submit documentation that specifically addressed this criterion; documentation from CR 14 included district handouts on occupational and vocational offerings and guidance procedures for high school students but not middle school students. Interviews and review of documentation reveal that, overall, the district is lacking a formal method for providing information on all programs to all students. See also CVTE 4.		

Appendix F

Themes and Recommendations Table

504 Processes, Policies and Procedures	
<i>Themes</i>	<i>Recommendations</i>
Inconsistency in implementation of processes, policies and procedures	<p>Clarify 504 policies and procedures at the elementary and high school levels; develop written guidelines for schools to operationalize 504 procedures including how 504 Plans are supervised/monitored.</p> <p>Develop clear procedures for transition planning for students who move from grade to grade as well as school to school.</p>
No district wide, required 504 Accommodation Plan form	Develop and consistently use a standardized 504 Accommodation Plan form at both the elementary and high school levels.
Roles and Responsibilities	
<i>Themes</i>	<i>Recommendations</i>
Inconsistency and/or lack of understanding of roles and responsibilities of CPS staff	Clarify the relationship, roles and responsibilities between the Central Office and individual schools for students protected under Section 504.
Central Office	
<i>Themes</i>	<i>Recommendations</i>
Lack of centralized database and record keeping	Develop, maintain and keep up-to-date a centralized database for students protected under Section 504 that can be disaggregated by grade, school, disability, ethnicity, etc.
Poor communication between Central Office and individual school buildings	Give accountability and authority to the Central Office 504 Coordinator to ensure that 504 procedures are consistently implemented at the building level.
Rigid categorical distinctions between special education and 504	<p>Begin to think less categorically about 504/special ed./Title I and other support services and programs. Explore the possibility of structuring positions in flexible ways so that there is a more integrated/coordinated approach to supporting students across general and special education.</p> <p>Review which Central Office position is most appropriate for 504 supervision and management.</p>

Poor communication of CPS policies and procedures to school staff	<p>Clarify the relationship, roles and responsibilities between the Central Office and individual schools for students protected under Section 504.</p> <p>Clarify 504 policies and procedures at the elementary and high school levels; develop written guidelines for schools to operationalize 504 procedures including how 504 Plans are supervised/monitored.</p>
Lack of professional development for staff	<p>Provide district-wide annual training to all building administrators on 504 responsibilities, policies and procedures including the differences between Section 504 and the IDEA, how to make a 504 referral, etc.</p> <p>Provide professional development and support to teachers and building staff implementing 504 plans including exemplars of an appropriate 504 Team, what constitutes an appropriate 504 evaluation, problem solving and planning processes, exemplars of an appropriate 504 Accommodation Plan, etc.</p>
No dedicated resources budgeted for 504 implementation	Identify the resource implications for addressing the needs of 504 protected students and the development of the necessary infrastructure.

Building Level

<i>Themes</i>	<i>Recommendations</i>
Lack of clarity on 504 Coordinator in each building PK-8.	<p>Clarify roles and responsibilities for 504 at the building level, including the role of the building principal, guidance or other support staff.</p> <p>Establish procedures for 504 recording keeping within each building.</p>
Lack of assignment “case manager” responsibility	Establish a process for assigning “case manager” responsibility for each 504 protected student at the building level.

<p>Need to strengthen involvement of TATs and general education teachers</p>	<p>Involve regular classroom teachers in the development and review of 504 Plans for individual students.</p> <p>Strengthen and utilize the Teacher Assistance Team (TAT) structure as a vehicle for collaborative problem solving between teachers to address concerns related to individual students including students who may have a disability and require 504 accommodations.</p>
<p>Lack of job-embedded professional development</p>	<p>Provide training and/or consultation to teachers and other staff in implementation 504 Accommodation Plans for individual students; e.g. the nature of the child's disability, how to implement the accommodations, etc.</p> <p>Ensure that all personnel are aware of individual student 504 accommodations including substitute teachers, paraeducators and other school personnel who need to know, depending on the nature of the child's disability.</p>
<p>Rigid categorical distinctions between special education and 504 and general education support for all students</p>	<p>At CRLS, consider establishing a resource room or study skills center to which students can be scheduled for "check-ins" and support on organizational and time management skills. This should be available to any student regardless of whether or not they have a documented disability and are on a 504 Plan or IEP.</p> <p>Strengthen and utilize the Teacher Assistance Team (TAT) structure as a vehicle for collaborative problem solving between teachers to address concerns related to individual students including but not limited to students who may have a disability and require 504 accommodations.</p> <p>At the PK-8 level, develop a continuum of supports for any struggling student regardless of whether or not they are on a 504 Plan or IEP.</p>
<p>Lack of up-to-date and accurate record keeping</p>	<p>Clarify responsibilities for record keeping in each school and at the Central Office including where 504 records are stored, access, relationship to the student's permanent educational record, etc.</p>

Communication with Parents	
<i>Themes</i>	<i>Recommendations</i>
Poor communication and/or involvement with under-served populations of parents	Conduct outreach activities for parents, particularly of under-served or hard to reach populations so that parents are aware of 504 policies, procedures, and practices.
Lack of or misunderstanding of information on parent rights, 504 procedures, etc.	<p>Develop parent-friendly brochures or guidebooks that explain 504 and special education policies, procedures and practices and parent rights. Disseminate this widely through web-based and direct mailing processes.</p> <p>Partner/collaborate with the Cambridge Parent Advisory Council (C-PAC) to inform and educate parents about roles, rights and responsibilities related to Section 504 and/or consider establishing a parent advisory committee for parents of 504 protected students.</p>
Delays or lack of responsiveness to parent concerns or requests	Encourage an affirmative, proactive approach to working with parents in support of the implementation of 504 Accommodation Plans.



Learning Innovations at WestEd
426 Industrial Ave, Suite 160
Williston, VT 05401
ph: (802) 951-8220