



CCPS

Collier County
Public Schools

PROCEDURES MANUAL

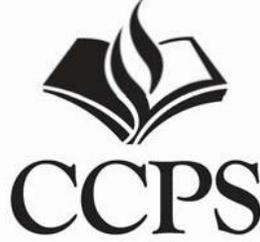
SECTION 504 OF THE REHABILITATION ACT OF 1973 AND THE AMERICANS WITH DISABILITIES ACT

Dr. Kamela Patton
Superintendent of Schools

2016-2017

VISION STATEMENT

All students will complete school prepared for ongoing learning as well as community and global responsibilities.



Collier County Public Schools

www.collierschools.com

Dr. Kamela Patton
Superintendent of Schools

THE DISTRICT SCHOOL BOARD OF COLLIER COUNTY

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This report has been prepared by The District School Board of Collier County.
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Report Number:

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The District School Board of Collier County does not discriminate on the basis of sex or disability in the education programs and activities that it operates, pursuant to the requirements of Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, respectively. The right not to be discriminated against extends to both employees and students of the District and shall include equal access to designated youth organizations in conformity with the Boy Scouts of America Equal Access Act. The following personnel should be contacted for inquiries about their rights or to learn how to file a complaint regarding discrimination.

Employees: Educational Equity Act, Title IX, Section 504 (Rehabilitation Act) or the Americans with Disabilities Act, contact Ian Dean, Executive Director, Human Resources and Deputy Title IX Coordinator for Employees, (239) 377-0386, The District School Board of Collier County, 5775 Osceola Trail, Naples, Florida 34109.

Students: Educational Equity Act, Title IX, or the Age Discrimination Act of 1975, contact Stephen McFadden, Coordinator, School Counseling K-8, and Deputy Title IX Coordinator for Students, (239) 377-0517, The District School Board of Collier County, 5775 Osceola Trail, Naples, Florida 34109

Section 504 (Rehabilitation Act) and the Americans with Disabilities Act, contact Dr. Dena Landry, Coordinator, Psychological Services, (239) 377-0521, The District School Board of Collier County, 5775 Osceola Trail, Naples, Florida 34109,

For questions or complaints (adults) regarding the Educational Equity Act, Title IX, Section 504 (Rehabilitation Act), or the Americans with Disabilities Act, contact Ian Dean, Executive Director of Human Resources, (239) 377-0386. For questions or complaints (individuals) regarding the Educational Equity Act, Title IX, or The Age Discrimination Act of 1975, contact Stephen McFadden, Coordinator of School Counseling K-8 (239) 377-0517. For questions or complaints (individuals) regarding Section 504 (Rehabilitation Act) and the Americans with Disabilities Act, contact Dr. Dena Landry, Coordinator of Psychological Services (239) 377-0521. The address for the above contacts is: The District School Board of Collier County, 5775 Osceola Trail, Naples, Florida 34109.

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Acknowledgements

Appreciation is extended to the following for providing information utilized in the development of this plan.

LRP's National Institute on Legal Issues of Educating Individuals with Disabilities,
May 2006

The Florida Department of Education
District Guide for Meeting the Needs of Individuals
Section 504 of the Rehabilitation Act of 1973
2005

The Council for Educating Individuals with Disabilities Essential
Training for Section 504 Compliance in the Public Schools
October 2001

The School Board of Broward County, Florida
Broward County Guidelines for Section 504 of
the Rehabilitation Act of 1973

The Dade County Public Schools Procedures for
Serving Individuals with Special Needs Section 504 of
the Rehabilitation Act of 1973

The Osceola County Public Schools
Section 504 Procedures
The Rehabilitation Act of 1973

Section 504, the ADA, and the Schools
Perry A. Zirkel, 1993

Compliance with the Americans with Disabilities Act:
A Self-Evaluation Guide for Public Elementary and
Secondary Schools
Office for Civil Rights (ISBN 0-16-048098-1)

The Orange County Public Schools
Section 504 Website

DISTRICT SCHOOL BOARD OF COLLIER COUNTY

The District School Board of Collier County has adopted the 2011 Florida Department of Education *District Implementation Guide for Section 504* as its procedural manual. The following section outlines procedures unique to Collier County Public Schools and serves to clarify the District's implementation of Section 504.

SECTION 504 POLICY STATEMENT

Section 504 of the Rehabilitation Act of 1973 is a federal civil rights statute whose intent is to prohibit discrimination against individuals with disabilities so they have full participation in programs and activities receiving federal financial assistance. It also guarantees that such individuals have access to a free appropriate public education (FAPE). Policy 2260.01 A.P. 2260.01A1 of the District School Board of Collier County provides for access to a free and appropriate public education to each individual with a disability within its jurisdiction, regardless of the severity of the impairment.

It is the intent of the District to insure that individuals who are disabled within the definition of Section 504 of the Rehabilitation Act of 1973 are identified, evaluated and provided with equal access to all educational programs and activities. Individuals may be eligible under Section 504 even though they may not be eligible to receive special education or related services pursuant to the requirements of the Individuals with Disabilities Education Improvement Act (IDEA 2004). Compliance and coordination of Section 504 within the District is the responsibility of the Compliance Officer. There is a Compliance Liaison assigned at each school. The Compliance Liaison oversees the entire Section 504 process at the school level. All decisions pertaining to Section 504 eligibility is determined by the individual schools' Problem Solving Team (PS Team).

DEFINITION OF SECTION 504 TERMS

Section 504: Section 504 prohibits discrimination against individuals with disabilities who meet qualifications as defined by Section 504 and who participate in federally funded programs and activities. Section 504 of the Rehabilitation Act of 1973 is a civil rights statute providing that:

No otherwise qualified individual with handicaps in the United States...shall, solely by reason of his/her handicap 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 or activity conducted by any Executive agency or by the United States Postal Service. (29 U.S.C., s. 794)

Change in Placement: Section 504 requires that the parents are notified prior to any significant change in placement. Examples of significant changes in placement are: expulsion, repeated suspensions which exceed ten days in a school year, progression from elementary to middle school, progression from middle school to high school, graduation from high school, placement in an alternative educational setting, or a significant change in the delivery of education.

Disability: (Section 504, CFR 104.3(2) (1). “*Physical or mental impairment-* An individual has a disability covered by Section 504 if he or she has a physical or mental impairment, which includes, but is not limited to: (1) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive digestive, genitourinary; hemic and lymphatic; skin; and endocrine; or (2) any mental or physical disorder such as mental retardation, organic brain syndrome, emotional or mental illness and specific learning disabilities.”

The student who has a physical or mental impairment that substantially limits one or more major life activities is entitled to a free and appropriate public education (FAPE) and may be entitled to Section 504 accommodations. The student who has a record of having an impairment, or is regarded as having an impairment is considered disabled under Section 504 for purposes of anti-discrimination protection. “Regarded as” does not apply to impairments that are transitory and minor, or expected to last six months or less.

Major Life Activity: Major life activities under Section 504 include, but are not limited to such activities as caring for one’s self, seeing, breathing, walking, hearing, speaking, learning, reading, concentrating, thinking, communicating, performing manual tasks, and working. These definitional criteria track those of the Americans with Disabilities Act Amendments Act of 2008 (ADAAA).

Mitigating Measures: Mitigating measures refer to any treatments or devices that serve to ameliorate or lessen the effects of a disability. PS Teams must assess the limitations resulting from the student’s impairment(s) without consideration of such measures in determining if the student is disabled. Specific examples of these measures are provided in the Florida Department of Education (FLDOE) District Implementation Guide for Section 504 (p. 108-109). The only exception to mitigating circumstances is the use of ordinary eye glasses or contact lenses.

Substantial Limitation: A person is substantially limited when he or she is restricted in terms of the condition, manner, or duration under which an individual can perform a particular major life activity, as compared to the condition, manner, or duration under which the average person in the general population can perform that same major life activity.

Discipline: School staff must reevaluate students with Section 504 services prior to suspending or expelling them for more than ten days. A team of people knowledgeable of the student must convene to complete a manifestation determination to assess if the behavior in question was related to the student’s disability. If not, the MTSS/PS Team then must consider if other strategies, interventions, or assessments are appropriate.

Evaluation: Section 504 evaluation includes a review of information from a variety of sources, such as teacher observations, attendance, behavioral information, standardized test scores, report cards, and information from parents and medical providers. Section

504 requires periodic reevaluations.

FAPE: FAPE refers to the provision of a free and appropriate public education as required by law. The provision of FAPE applies both to the IDEA 2004 and Section 504. Students ages three through 21 must be provided access to regular or special education and related aids and services that are designed to meet the individual educational needs of students with disabilities. The instruction must be individually designed to meet the needs of these students as adequately as the needs of non-disabled students. An appropriate education is based upon an adherence to procedures that satisfy the requirements for least restrictive environment, evaluation and placement, and procedural safeguards. Students with disabilities who qualify for Section 504 services must be provided with aids, benefits, or services that are as effective as those provided non-disabled persons.

Monitoring: Section 504 Plans are reviewed annually or sooner if requested by the parents/guardians or District personnel. Annual reviews are to be conducted at the end of the first quarter of each school year. Reevaluations are conducted every three years or at the time of a significant change in placement. Reevaluations are also conducted when the school has received new information on a student indicating a change in physical or mental status and the need for modification of the Accommodation Plan.

Referral: Referral refers to any verbal or written (letter or email) request for Section 504 evaluation, eligibility determination, and/or Accommodation Plan made by parents/guardians, District personnel, community service providers, or others who have knowledge of the student. Upon receipt of a referral, the PS Team has 60 calendar days of attendance to complete an evaluation.

OVERSIGHT OF SECTION 504 DISTRICT COMPLIANCE OFFICER

The Coordinator of Psychological Services/Section 504 is the District's Section 504 Compliance Officer. The Compliance Officer is responsible for coordinating the District's efforts to comply with and fulfill its responsibilities under Section 504 and Title II of the Americans with Disabilities Act as amended ("ADAAA"). A copy of the Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act, as amended, including copies of their implementing regulations, may be obtained from the Compliance Officer. The Compliance Officer can be reached at:

5775 Osceola Trail, Naples, FL, 34109
(239) 377-0521 phone
(239) 377-0526 fax

The Compliance Officer will oversee the investigation of any complaints of discrimination based on disability, which may be filed pursuant to the Board's adopted grievance procedure, and will attempt to resolve the grievances.

The Compliance Officer will also oversee the training of employees in the District so that employees understand their rights and responsibilities under Section 504 and the

ADAAA, and are informed of the Board's policies, administrative procedures and practices with respect to fully implementing and complying with the requirements of Section 504/ADAAA.

COMPLIANCE LIAISON

Building principals or their designees shall serve as the individual school's Compliance Liaison. Requirements for this role include participating in District mandated training and maintaining working knowledge of the Procedures Manual and updates on Section 504 as they become available. The Section 504 Compliance Liaison will disseminate and implement the procedures set forth by the District and the State Implementation Guide on Section 504. The Compliance Liaison will oversee the process for referral, evaluation, eligibility determination, Child Find, and record maintenance, as described below. Further, it is the responsibility of the Compliance Liaison to monitor the implementation of Section 504 Plans to insure that they are followed with fidelity. At the beginning of each school year, the Compliance Liaison will ensure that teachers are provided a list of students with disabilities and their individual Section 504 Accommodation Plans. The Compliance Liaison will ensure that the processes for annual reviews and reevaluations are followed as described above.

The Section 504 Compliance Liaison acts as a consultant with teachers, parents/guardians, physicians, service providers, the PS Team, and community agencies. The Compliance Liaison will conduct all Section 504 PS Team meetings pertaining to eligibility, review, reevaluation, and dismissal. The principal may designate an individual to assist with the clerical duties of Section 504 file maintenance, parent notification, and distribution of Plans as necessary.

Staff training is an essential component of the Compliance Liaison's role. At the beginning of each year, the Compliance Liaison will provide an overview of Section 504 to the school staff with specific information pertaining to Child Find, Section 504 eligibility, and the importance of providing accommodations as specified in individual Section 504 Plans.

PROBLEM SOLVING TEAM (PS TEAM)

All individuals suspected of Section 504 eligibility should be referred to the school's Problem Solving Team (PS Team). Sources of referral may include parents/guardians, teachers, school administrators, physicians, or others. Responsibilities of the PS Team include parent/guardian conferencing, acquisition of information regarding the nature and extent of the problem, determination of existence of a disabling condition, the extent to which the condition limits a major life activity, and determining if general education interventions are sufficient to provide equal access for the individual.

Individuals referred to the PS Team may be found to be ineligible for accommodations under Section 504. If the PS Team determines that a substantial limitation does not exist or if the individual's needs can be met with typical general education interventions, then parents/guardians should be informed of the recommendations. In some cases, individuals will be identified as eligible for special education under IDEA 2004. Provision of services under an Individual Education Plan (IEP) meets requirements for accommodations under Section 504, therefore, it is rare that a student would have both a 504 Plan and an IEP.

All considerations of the PS Team should be appropriately documented within the ENRICH Platform, described below, including any educational accommodations required to provide an appropriate education.

EVALUATION AND CONSENT

Consistent with the provisions of the IDEA 2004, Section 504 initial evaluations should be completed within sixty (60) calendar days from the point of receiving consent for evaluation. Further, in accordance with Rule 6A-6.0331(3)(a)(3), FAC-General Education Interventions, the district must request consent for a Section 504 evaluation within thirty (30) school days if:

1. The parent makes a request for an evaluation;
2. The student is age 3 to kindergarten entry age or kindergarten through grade 12;
3. There is documentation or evidence that the student may have a disability, and
4. The PS Team determines that a circumstance described in subparagraphs (3)(a)1., or (3)(a)2., of this rule exists.

The requirement for obtaining consent within 30 days would not apply in those cases where the parent and the school agree otherwise in writing.

RECORDS MAINTENANCE

It is the responsibility of the Compliance Liaison to oversee maintenance of all records on students with Section 504 Plans. Section 504 records will be maintained on the ENRICH online Platform. Additionally, a copy of the eligibility documents and the Accommodation Plan will be maintained in the student's electronic cumulative folder. Section 504 Plans have thus far been maintained in orange folders kept in the cumulative record. For students who had Section 504 Plans prior to the 2013-14 school year maintained in the ADN 504 drive, those Plans will be entered into ENRICH upon annual review or when a reevaluation occurs. The Compliance Liaison is responsible for ensuring that the school Data Entry Clerk enters initial Section 504 eligibility dates and any dismissal dates on the FOCUS Platform.

THE JOHN M. MCKAY SCHOLARSHIPS FOR STUDENTS WITH DISABILITIES PROGRAM

The John M. McKay Scholarships for Students with Disabilities Program (known as the McKay Scholarship Program) was established to provide parents of students with disabilities school choice options. The program includes students with disabilities who have an individual educational plan (IEP) or 504 Accommodation Plan. Pursuant to Section 1002.39(5), F.S., a student meeting the McKay eligibility requirements may choose to attend another public school within the school district where there is a program available, or in an adjacent district, or a participating private school in the state of Florida. When the parent chooses a public school outside of the student's residence zone, the parent is responsible for transportation as this is consistent with the school board's choice and out-of-zone plan.

Parents shall file intent to participate in the McKay Scholarship Program on the www.floridaschoolchoice.org website. If applying for a public school choice, the parent must also submit an application with Student Relations Zoning and School Choice. The McKay Scholarship Program has no deadlines for filing intent to participate. The parent of an individual with a disability may request and receive from the state a McKay Scholarship for their child to enroll in and attend a private school or to enroll in and attend a public school other than the one to which assigned, or a public school in an adjacent school District which has a program with the services agreed to in the Section 504 Accommodation Plan, if the individual has:

1. Been enrolled and reported for funding in a Florida Public school during the preceding October and February Florida Education Finance Program surveys (Grades K-12);
2. Received specialized instructional services under the Voluntary Prekindergarten Education Program pursuant to Section 1002.66 during the previous school year and the individual has a current Section 504 Accommodation Plan developed by the local school board in accordance with the rules of the State Board of Education for the John M. McKay Scholarships for Students with Disabilities Program;
3. Spent the prior school year in attendance at a Florida public school or the Florida School for the Deaf and the Blind; or
4. Has been a pre-kindergarten student who was enrolled and reported for funding in a Florida public school during the preceding October and February Florida Education Finance Program surveys and was at least 4 years old.
5. A dependent child of a member of the United States Armed Forces who transfers to a school in this state from out of state or from a foreign country due to a parent's permanent change of station orders is exempt from the above paragraph but must meet all other eligibility requirements to participate in the program; including:
6. The parent has obtained acceptance for admission of the individual to a private school that is eligible for the program and has requested from the FLDOE School Choice (www.floridaschoolchoice.org) a scholarship at least 60 days before the date of the first scholarship payment. The request must be communicated directly to Florida School Choice in a manner that creates a written

or electronic record of the request and the date of receipt of the request. Florida School Choice must notify this District of the parent's intent upon receipt of the parent's request. The District will complete a matrix of services as required for an individual requesting a current Section 504 Accommodation Plan.

- An individual is not eligible for a John M. McKay Scholarship while he or she is
- a. Enrolled in a school operating for the purpose of providing educational services to youth in Department of Juvenile Justice (DJJ) commitment programs;
 - b. Receiving a Florida tax credit scholarship;
 - c. Receiving an educational scholarship;
 - d. Participating in a home education program;
 - e. Participating in a private tutoring program;
 - f. Participating in a virtual school, correspondence school, or distance learning program that receives state funding pursuant to the individual's participation unless the participation is limited to no more than two courses per school year;
 - g. Enrolled in the Florida School for the Deaf and Blind; or
 - h. Not having regular and direct contact with his or her private school teachers at the school's physical location.

The District must notify the parent of an individual with a Section 504 Accommodation Plan about available school choice options by April 1 of each year and within ten days after a 504 Accommodation Plan is issued. The District will also inform the parent of the availability of the Florida School Choice Department's telephone hotline and Internet website for additional information on John M. McKay Scholarships, and offer parents the opportunity to enroll the individual in another public school with the District.

Parents are not required to accept the offer of enrolling in another public school in lieu of requesting a John M. McKay Scholarship to a private school. However, if the parent chooses the public school option, the individual may continue attending a public school chosen by the parent until the individual moves to the next level.

If the parent chooses the private school option and the individual is accepted by the private school, the parent of the individual must notify Florida School Choice 60-days prior to the first scholarship payment and before entering the private school in order to be eligible for the scholarship. The scholarship amount for the individual would be based on the current individual program cost factor generated by the individual under the Florida Education Finance Program (FEFP).

The parent of an individual may choose, as an alternative, to enroll the individual in and transport him/her to a public school in an adjacent school District, which has a program with the services agreed to in the individual's Section 504 Accommodation Plan. The parent is responsible for contacting the adjacent school District to inquire/obtain approval for enrollment in that District.

To apply for a McKay Scholarship and/or to obtain additional information, parents may do so at www.floridaschoolchoice.org.

SECTION 504 DISTRICT PROCEDURES FOR STUDENTS WITH INDIVIDUAL HEALTH CARE PLANS, STUDENTS WITH SPEECH IEPs ONLY, AND FOR THE PROVISION OF RELATED SERVICES

STUDENTS WITH SPEECH IEPs ONLY

Students who only receive speech therapy may present with new areas of disability requiring accommodations not afforded by the current IEP. The following procedures are provided:

- When there is information provided to PS Teams that a student with a speech IEP has presented with a physical or mental impairment separate from articulation difficulties, Section 504 eligibility should be considered.
- The PS Team should obtain parental consent for an evaluation under Section 504 (different from IDEA Consent for Evaluation).
- Once data have been collected, the PS Team should convene a meeting to 1) determine eligibility under Section 504, and 2) the need for an Accommodation Plan.
- If the student meets requirements for both, the Plan should be developed with the notation on the final page that "Accommodations will be provided within the student's IEP."
- The BEGIN date for the 504 Plan will be the date of Section 504 eligibility.
- The END date will be the date the IEP is amended or updated to reflect the new accommodations. The BEGIN and END date cannot be the same in the FOCUS Platform.
- For specific information on adding accommodations to the IEP, the Intervention Support Specialist may contact his/her Exceptional Education and Student Supports Coordinator.

PROCEDURES FOR SECTION 504 RELATED SERVICES

1. Procedure when the PS Team is aware that a related service (OT, PT, AT) has been or will be requested:
 - A. Convene a meeting to consider the request with the appropriate related service provider present;
 - B. Review any available intervention data aligned with the requested related service and determine the need for such service;
 - C. Obtain parental consent for related service evaluation, and
 - D. Determine eligibility, the need for accommodations, and the related service by following the Section 504 process.
2. Procedure when the PS Team discovers during the Section 504 eligibility meeting that there is a need for a related service or a parent makes a request:
 - A. Advise parents and PS Team that Section 504 requires the participation of individuals who are knowledgeable of evaluation data, the student, and programs. Related service providers are the most knowledgeable of their services and evaluations specific to their programs.

- B. Conclude meeting and reschedule during a time that the related service provider can attend.
- C. Do not obtain consent for a related service evaluation at this time.
- D. Reconvene meeting and follow steps beginning with B as described in section 1.

When it is determined that a student requires a related service, the PS Team will include a plan of care within the ENRICH online Platform.

PROCEDURES FOR STUDENTS WITH INDIVIDUAL HEALTH CARE PLANS (IHPs)

Students with medical diagnoses may often have unique issues that limit their access to services, school programs, and facilities that are available to all students. While a number of these students have individual health care plans (IHPs), other accommodations may address these limitations. The PS Team should actively consider the presenting issues and needs of all students who have IHPs. Of particular importance are those students targeted as high risk and have been identified among those who frequently have both an IHP and Section 504 Accommodation Plan.

The following procedures are provided to guide each Team through this process:

- Section 504 Liaisons and school nurses will receive a monthly listing of students with IHPs as generated by the District's Health Office.
- In consultation with the school nurse, the PS Team will determine which students would be considered as having accommodation needs beyond the IHP. (Note: Depending on the outcome of the preliminary analysis, this section may suggest particular attention to students with diabetes, seizures, etc.)
- The Section 504 Compliance Liaison will implement procedures for these students currently in place for determining Section 504 eligibility and the need for an accommodation plan.
- The meeting should have a school nurse present to advise the PS Team on the student's medical condition and implications for learning.
- If the student is determined eligible under Section 504, this should be reflected on the IHP.
- At any time the IHP is modified or determined no longer needed, the PS Team should also conduct a review of the Section 504 Plan and make the appropriate modifications or recommendations if indicated.
- Reviews, reevaluations, and dismissal of Section 504 for students having an IHP should include the school nurse as part of the PS Team.

GRIEVANCE PROCEDURES

Parents have the right to request mediation, file a complaint pursuant to Florida Administrative Procedure Act (F.S. Chapter 120) or request an impartial due process hearing related to decisions or actions regarding their child's identification, evaluation, educational program, or placement. A detailed description of these procedures can be found at the following link:

http://www.collierschools.com/student_services/docs/504/GRIEVANCE%20PROCEDURES%208.25.14.pdf

FORMS

Page 111 of the *District Implementation Guide for Section 504* (Florida Department of Education, 2011) provides examples of forms used to maintain compliance with the provisions of Section 504. By using the ENRICH online Platform, the district has been able to incorporate the content of the forms within the Platform. The intent is to use all forms in conjunction with each other, rather than separately, to avoid compromising compliance. As noted above, the State Implementation Guide forms may be viewed on page 111 in Appendix E: Sample Forms section. While these exact forms have not been duplicated for the Enrich online Platform, their purpose and content are intact. It is believed that the adaptations do adequately meet Section 504 requirements.