



Your guide to documenting accommodations in Section 504 plans

When documenting accommodations in students' Section 504 plans, the most important task for your teams is to ensure that there's no ambiguity, said Linda Yoder, a school attorney at [Shipman & Goodwin LLP](#) in Hartford, Conn.

Common accommodations on 504 plans include extended time, preferential seating, study guides, "anytime" passes, and alternative test sites when or as needed, Yoder said.

"All of those phrases are ambiguous in that they can be interpreted differently by different people, including school and family, and they don't have sufficient parameters to explain ... what is intended," Yoder said. "This is what leads to conflict between the student, teachers, and the family."

How can you avoid this conflict? Be as clear as possible when writing accommodations into 504 plans. Here are some suggestions.

- **Prepare for the particular school year.** Each year, look at the student's accommodations within the context of what will be coming up in the school year. Will there be any specific activities for which the student will need accommodations? For example, if the student's class will take a field trip to a Civil War reenactment, the team may need to think about accommodating a student who uses a wheelchair or one who has allergies.

Also ensure the plan is up-to-date. "I have seen 504 plans in high school that still say, 'Students should not do the water play or play in the sand,'" Yoder said. "There isn't recess or that kind of play station at a high school level, and the student is more mature and knows what he can and can't do. Accommodations seem to go in and never go out."

- **Talk with the student's teachers.** Before going into the 504 team meeting, talk with the teachers about what accommodations work best in their classrooms, Yoder said. Ask them questions like, "What accommodations work for you? What accommodations don't work for you? How do you interpret this language? Is there a better way to write this accommodation to fit your class?"

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- **Explain accommodations fully.** People fall into the trap of thinking accommodations should be described in just a few words, Yoder said. But there is no rule that says accommodation labels have to be, or even should be, short. If it needs to be explained, you need to write it out, she said.

A number of school districts use electronic forms that provide limited space to document each accommodation, Yoder said. Don't allow your form or program to dictate how much you write, she said. "An accommodation, when needed, can be [described in] several sentences; not two words that really do not identify sufficiently the accommodation for that student."

- **Avoid using the phrase, "as needed."** Who determines "as needed"? The teacher? The parent? The student? What does it mean?

"Unless someone can read it and say, 'I can tell you what that means in every circumstance that will come up in my class,' it should not be written that way as an accommodation," Yoder said.

- **Identify what classes the accommodations are for.** If a student only needs extended time for long written projects in her English and history classes, don't document the 504 accommodation as simply "extended time," Yoder said. The student doesn't get extended time in physical education or on a short quiz in her math class; she gets extended time on long written projects in English and history classes. Specify that.

- **Ensure accommodations are specific for circumstances unique to the student.** For example, if you have a student with a chronic illness who is out of class intermittently because of headaches, focus on what kinds of accommodations fit that circumstance and write them into the 504 plan.

- **Communicate with parents.** Ask parents, "What is your idea of what this accommodation means?" Yoder said. "We get parents who think that an accommodation is not to assist the student in having access to material missed because they were absent, but in helping them get a better grade," Yoder said. "That's really not a 504 accommodation."

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