

504 Plan vs. IEP – A Quick-Reference Guide for Educators

Both 504 Plans and Individualized Education Programs (IEPs) are legal tools that ensure students with disabilities can access and succeed in school. While they share the goal of providing equitable access, they stem from different laws, serve different purposes, and have distinct eligibility criteria, processes, and protections. This quick-reference guide is designed to help educators understand the differences at a glance.

Category	504 Plan	IEP
Governing Law	Section 504 of the Rehabilitation Act of 1973	Individuals with Disabilities Education Act (IDEA)
Purpose	Provides accommodations to ensure equal access to learning for students with disabilities	Provides specialized instruction and accommodations for students whose disability impacts their ability to make effective educational progress
Eligibility	Any disability that substantially limits one or more major life activities	Specific disability categories defined under IDEA
Plan Content	Accommodations, supports, services (no specialized instruction)	Specialized instruction, measurable annual goals, accommodations, related services
Enforcement	Office for Civil Rights (OCR)	State education agency & Office of Special Education Programs (OSEP)
Parent/Student Rights	Procedural safeguards under Section 504	Procedural safeguards under IDEA (more extensive)

Pro Tips for Educators:

- A 504 can sometimes be a stepping stone toward an IEP if the student's needs change. But, it is not an automatic "consolation prize" for the student (or parent) if a child does not qualify for an IEP and special education services. With that said, if there is evidence of a disability but it is determined that a child does not require specially designed instruction via an IEP and special education services, it is likely that a child will qualify for a 504 plan.
- Always document accommodations and services clearly. This protects both the student and the school.

Educator Quick-Action Toolkit

Quick Checklist: When to Suspect a 504 Plan vs. an IEP

Consider a 504 Plan when:

- The student has a physical or mental impairment that substantially limits one or more major life activities.
- The student does not require specialized instruction, but does require accommodations to access the general curriculum.
- There is a need to remove barriers related to physical, medical, or emotional access without altering the core instructional program.

Consider an IEP when:

- The student's disability fits one of the 13 categories recognized under IDEA.
 - The student requires specially designed instruction (i.e. direct services by a special educator, service provider or specialist) to make effective educational progress.
 - Goals and objectives need to be formally documented and progress monitored.
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Case Examples

- **Example 1:** A student with ADHD who needs extra time on tests, movement breaks, and preferential seating – but is meeting grade-level standards – may qualify for a 504 Plan.
- **Example 2:** A student with dyslexia who is reading two grade levels below peers and requires specialized reading instruction in addition to classroom accommodations would likely qualify for an IEP.
- **Example 3:** A student recovering from surgery who will miss several weeks of school and needs temporary homebound services may receive a short-term 504 Plan.

Documentation Tips

- Keep detailed records of interventions and accommodations tried in the general education setting.
- Collect work samples, progress monitoring data, and teacher observations to support eligibility discussions.
- Communicate with families early and often to gather input and share updates on student progress.

- Document any changes in student needs promptly. This can influence whether a 504 should transition to an IEP or vice versa.