

IDEA 2004, Section 504 and the New Americans with Disabilities Act Amendments of 2008

Key Pros and Cons for Kids with
Disabilities

ALLIANCE Webinar

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Disclaimer: The information presented is a general and limited overview of very complicated material and is neither complete nor intended as legal advice. It is for general informational purposes only. Individuals with questions or legal problems should consult with a person knowledgeable in special education law.

How Schools are Covered

- All states now accept funding through IDEA. As a result, all states and local school districts within each state are required to follow IDEA requirements.
- Section 504 applies to all entities which receive federal financial assistance, although Section 504 itself provides no funding. Because all public schools receive federal financial assistance, all public schools are covered under Section 504.

Who is covered?

- Both IDEA and Section 504 have three criteria that must be satisfied in order to be covered by the law, but the criteria for each law are different.

1. Eligibility - Who is Covered?

- IDEA creates 13 categories of disability, each of which has its own criteria. A student must be determined eligible under at least one of the categories in order to qualify for special education.
- Section 504 does not use categories for eligibility. Any student with an **identified physical or mental disability** may be eligible for special education if they meet all three criteria under Section 504

AD/HD and Tourette Syndrome

IDEA Regs Added ADHD & TS in '97 & 2006

- ADHD added to definition of OHI in 97 and Tourette Syndrome added in 2006. OHI covers a variety of health impairments that result in limited strength, vitality or alertness, including limited alertness to educational tasks due to heightened sensitivity to environmental stimuli.

Both Recognized by OCR under Section 504

- As Section 504 does not require eligibility under a particular category, ADHD and Tourette Syndrome were already recognized as potentially eligible conditions under Section 504

2. Differences in standards for how the impact of the disability is assessed

- Under IDEA, all categories other than speech and language impairment require that the child's disability adversely affect educational performance.
- Note that an adverse affect on educational performance could be in an area other than academics, e.g., behavior.
- Under Section 504, if the student's impairment substantially limits a major life activity, such as learning, working or caring for oneself, the student may be entitled to protection under §504

3. Different standards for what services must be needed by the student to qualify for eligibility

IDEA

- In order to qualify for special ed, the student must need some form of special ed instruction. However, this does not mean instruction must be in a self-contained or resource class, but can include specialized instruction within the regular education classroom.

Section 504

- A student with a disability may qualify for 504 protection if the student requires special education or related services. §504 does not require that the student need special education in order to qualify. For example, a student might qualify just due to need for preferential seating or a quiet room to take tests, or assistance from a nurse to take medication.

IDEA 2004 expands eligibility emphasis beyond academic performance....

- Provides that a child is entitled to a free appropriate public education (FAPE) even if the child is receiving passing grades, progressing from year to year, or has not been retained from progressing to the next grade level (Sec. 300.101(c))

THE ADA and Section 504

- Section 504 of the Rehabilitation Act was enacted in 1973 and applies to all programs and activities receiving federal financial assistance
- The Americans with Disabilities Act of 1990 (amended by the Americans with Disabilities Act Amendments Act of 2008) applies to:
 - all qualifying private employers (Title I),
 - all state and local government programs, including the public schools (Title II), and
 - all places of public accommodation, including non-religiously controlled colleges and universities and test agencies (Title III)

Section 504, the ADA and the Schools

- Under the original ADA of 1990 and the new ADAAA of 2008, the rules generally parallel the regulations and interpretations that were developed for Section 504, in relation to public schools and other public entities
- Because Section 504 preceded the enactment of the ADA by many years, Section 504 has generally been the basis for disabilities protections in the public schools
- Since the enactment of the ADA, interpretations of the ADA and Section 504 have generally been regarded as applying equally to both laws

The Impact of ADAAA of 2008

- Because ADA and 504 are interpreted in parallel, the ADAAA 2008 will be applied to the public schools in their interpretation of both the ADA and Section 504, as well as to test agencies and colleges and universities.
- In other words, even though the Section 504 regulations have not been amended, ADAAA 2008 effectively changes both sets of rules

ADA Definition of Disability

- The person has a physical or mental impairment that substantially limits one or more major life activities;
- The person has a record of such an impairment; or
- The person is regarded as having such an impairment.
- 28 CFR Sec. 36.104

Prior Court Interpretations Dramatically Limited the Definition of Disability

- Sutton vs. United Airlines (527 US 471)
1999 ruled that if the individual used mitigating measures, such as auxiliary aides or medication, which mitigated the effect of the disability sufficiently to allow them to function, they were no longer regarded as a person with a disability.

Toyota Motors vs. Williams

- Interpreted “major life activity” very narrowly to limit the ADA’s application only to those functions that were of central importance to most people’s daily life, such as “caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and walking.”
- Seemed to require that limit on a major life activity must impact the person’s overall functioning
- Rejected application of ADA to individuals whose disability or symptoms were episodic or in remission

Major Expansions in Eligibility Based on the ADAAA of 2008

Limitation in one major life activity need not impact other major life activities in order to trigger ADA protection

ADAAA 2008 Requires that limitation on “Major” life activity be broadly, rather than narrowly, interpreted!

Conditions that are episodic or in remission are covered when they are active –

This may be of use for people with disabilities whose symptoms vary at different times and under different conditions, such as children with AD/HD, depression, asthma or allergies, diabetes, anxiety

Definition of Major Life Activities Expanded

- Major life activities include, but are not limited to:
 - Caring for oneself, performing manual tasks , seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, **learning, reading, concentrating, thinking,** communicating, working, and non-volitional bodily functions. **(emphasis added)**
 - **Addition of learning, reading, concentrating, and thinking make it much easier for students with emotional, communication or neurobiological disabilities (such as LD or AD/HD) to qualify for protections of ADA & 504**

ADAAA Eliminates Mitigating Measures Limitation

- New amendments prohibit consideration of effect of mitigating measures in evaluating whether a person has a disability, except for the use of glasses or corrective lenses if they fully correct vision problem.
- Elimination of mitigating measures limitation relevant for people using stimulants or other psychotropic medications or various assistive technology
- Also relevant for people with disabilities requiring accommodations such as digital books, extra time, preferential seating,

Mitigating measures....

- Mitigating measures include, but are not limited to, medication, prosthetics, hearing aids, medical equipment, learned behavioral or adaptive neurological modifications, assistive technology or accommodations
- For people with disabilities, this could include medication, 1-1 assistance, digital books, extra time, preferential seating, quiet rooms for work, study or test taking, enlarged or modified texts, organizational aids, extra review or assistance

Effect of change....

- Requires determination of disability without consideration of the impact of the mitigating measure(s)
- May allow for clearer argument for accommodations for individuals taking tests, seeking college accommodations, or in employment, who performed well in part because of the ability to use the mitigating measures

Examples...

- A student with ADHD or an anxiety disorder that is able to perform at a superior level on tests with the use of medication, a quiet room and extra time, will still be regarded as having a disability if the condition substantially limits their ability to perform without those measures....
- A student with a learning disability may be entitled to extra time or modified testing if their reading disability interferes with their ability to take timed tests or to comprehend material if the test is to test something other than reading...
- A student might even more easily qualify for protection based on recognition that they have to spend 3-4 hours to complete the same amount of work that others complete in 1 hour, even though they ultimately complete it very well.

Expands protection for people “regarded as having a disability”

- “Regarded as...” category was intended to protect individuals were subject to discrimination that
 - Did not have a disability but were perceived as having one or
 - Had the disability but only with minor symptoms
 - Courts interpreted this to apply only if institution or employer regarded person as having a disability that substantially limited a major life activity

ADAAA 2008 clarifies meaning of “Regarded as...”

- Under ADAAA 2008, a person is protected from discrimination based on being regarded as having a disability, whether or not the impairment is perceived to limit a major life activity
- As a result, a person perceived to have a disability or whose symptoms do not substantially limit their functioning would still be protected from discrimination based on the perception of disability, regardless of the perceived limit on their major life activities.
- For example, a student who was HIV Positive, but asymptomatic, would be protected from discrimination by a teacher that believed the student had a contagious illness and didn't feel they should be in the class as a result.

The Bottom Line:

More People will Qualify as Persons with Disabilities Entitled to Protection from Discrimination Based on Their Disability and Eligible to Receive Reasonable Accommodations

Evaluation

IDEA

- IDEA describes in detail the multi-disciplinary evaluation procedures required to determine if a child is eligible for special education
- IDEA requires that the testing be non-discriminatory.
- It also requires schools to consider the findings of outside evaluators and, under some circumstances, requires the school to pay for the independent evaluation.

Sec. 504

- Section 504 requires the school district to establish evaluation procedures which are non-discriminatory, use tests which are validated for their stated purpose, accurately reflect the child's ability, and incorporate information from more than one test and from a variety of sources.
- Outside evaluations may be one of the sources that the school considers in determining eligibility

IDEA 2004 Expands Scope of Evaluations

- Evaluations and assessments must still be non-discriminatory
- Evaluations must be provided in the language **and form most likely to yield accurate information on what the child knows and can do academically, developmentally and functionally.** (20 USC Sec. 1414(b)(3)(A)(ii))

Frequency of testing

- IDEA requires that the child be reevaluated at least every three years. The school may use similar procedures or recommend a more limited evaluation. However, the parent has a right to request a full reevaluation at the three year point if they wish it.
- The parent or school staff may request an evaluation at any time if they feel it is needed, but the school decides whether it should be provided.
- Under Section 504, a child must be reevaluated "periodically."
- A child's Section 504 plan should not be significantly changed or terminated without a reevaluation

Child Find

- IDEA places the burden on the school district to identify, evaluate, and where appropriate, provide services to all children suspected of having disabilities who attend school in the school district, including students attending private schools.
- Section 504 protects all children with disabilities from discrimination, and requires that the school. The Office for Civil Rights has indicated that schools should evaluate all children who may be eligible for 504 services.

The Right to a Free Appropriate Public Education

- IDEA requires that all eligible students receive a free appropriate public education, including special education and related services which are necessary for a child to benefit from education.
- Section 504 also requires a free appropriate public education designed to meet the child's individual needs as adequately as the needs of students without disabilities are met.

FAPE Under IDEA

- Provides the child with special education and related services necessary to benefit from education
- Must be based on the child's unique needs and documented in the child's IEP
- IEP must be developed following IDEA procedures and must be "reasonably calculated to allow the child to receive **some educational benefit.**"

IEP vs. 504 plan

- IDEA (special education and related) services must be provided pursuant to an Individual Education Plan (IEP) developed with parent participation and based on the child's unique needs.
- The IDEA regulations lay out very detailed provisions for the process for developing IEPs and for the contents of IEPs, including that they contain annual goals, that the goals be measurable, and that the plan be reviewed at least annually.
- The IDEA requires that an IEP be developed within 30 days of when a child is determined eligible.
- Section 504 plans can include specialized instruction, related services, and/or accommodation within the regular education classroom. Contrary to popular belief, §504 is not limited to regular education based services, accommodations or modifications of regular education programs, although that is how it is typically used.
- Note that the §504 regulations allow school districts to use IDEA procedures as a means of implementing §504 requirements, but do not require them to do so. Check your school's §504 plan to determine this.

Building in IEP Accountability in the IDEA '04 IEPs

- IDEA '04 eliminates the requirement for Short Term Objectives, but no limitation on the number of goals, so additional goals can be added in lieu of more detailed STOs
- IDEA '04 requires progress reporting, so the progress reports can be defined to include meaningful measures of progress
- IDEA '04 still requires a measurable statement of expected annual progress, so a measurable baseline and end point are still required

Basis for Services

- IEP must include a statement of special education, related services and supplementary aides and services, **based on peer-reviewed research to the extent practicable (20 USC Sec. 1414 (d)(1)(A)(i)(IV))**
- This puts **methodology on the agenda**

Expanded IDEA Transition Planning Rules

- Transition Plan must be developed and in place when child is 16.
- Expands requirements for transition plans to include “appropriate measurable postsecondary goals based upon age appropriate transition assessments including training, education, employment and, where appropriate, independent living skills”
- Transition services (**including courses of study**) needed to assist the child to reach those goals.
- (1414(d)(1)(A)(i)(VIII))

The buck stops with the school

- If the Transition Plan involves other agencies, those agencies must be invited to the IEP transition planning meeting and if they fail to deliver, the school must reconvene the IEP to “identify alternative strategies to meet the transition objectives....20 USC Sec. 1414 (d)(6)

Least Restrictive Environment

- IDEA requires that the child, to the maximum extent appropriate, be educated with children who do not have disabilities and that the child be removed from regular education only if and to the extent that even with provision of supplementary aids and services, the child cannot be educated satisfactorily in regular education.
- It also requires that the child be educated in the class he or she would have been but for the disability, unless the IEP requires otherwise and that, in any event, the child be educated as close to home as possible.
- Under Section 504, children with disabilities shall be educated to the maximum extent appropriate with children who do not have disabilities unless it is demonstrated that the education of the person in the regular environment with the use of supplementary aids and services cannot be achieved satisfactorily.

Procedural Safeguards and Due Process

- Notice, Participation and Consent
- IDEA confers on parents a wide variety of detailed procedural rights, including:
 - 1) the right to participate in all staffings;
 - 2) the right to consent to evaluation and **ONGOING** initial and placement in special education;
 - 3) the right to notice whenever the school proposes to take or refuses to take action with respect to the child and to be informed of procedural safeguards;
 - 4) the right to request a due process hearing.
- Section 504 requires notice (to the parents) of actions regarding the identification, evaluation or educational placement of children with disabilities who need special instruction or related services.

Due Process Hearing Procedures

- Due Process Hearing
- Must have resolution session or mediation prior to hearing
- Right to an impartial hearing using an independent hearing officer;
- Right to present testimony and cross-examine witnesses;
- Right to exclude evidence not presented by the opposing side at least 5 days prior to the hearing;
- Right to counsel;
- The right to appeal in court and recover attorney's fees if successful
- Section 504 provides for an impartial hearing, but does not provide detail as to how it should operate. Further, although the hearing officer is supposed to be impartial, they are appointed by the school district.
- A party may appeal to court if they are unsuccessful in their Section 504 due process hearing.

Stay Put Placement

- IDEA provides that if either party requests a due process hearing immediately after a proposed change in placement, the child remains in the last agreed upon placement until all administrative and legal proceedings are resolved, unless student is being transferred to an interim alternative educational setting for disciplinary reasons
- Neither Section 504 nor its regulation contain a stay put placement provision, but some interpretations suggest the child's placement should be maintained while a hearing is pending. Section 504 requires an evaluation before a change in placement, which includes a suspension or expulsion in excess of 10 school days.

Long-term suspension or expulsion may only occur under both laws if the behavior is determined to not be related to the child's disability

- IDEA requires that a Manifestation Determination Conference be convened to determine if the child's behavior was caused by the child's disability. If so, regular education disciplinary exclusion may not be employed.
- Section 504 also requires that a Manifestation Review meeting be convened for this purpose.

Building Protections for Kids with Disciplinary Challenges

- Try to build into the IEP or Section 504 plan as much information about the circumstances where a child's disability may cause disciplinary problems as possible
- Build in positive behavioral intervention strategies to try to teach appropriate behavior
- Build in a hierarchy of responses to try to minimize the circumstances where disciplinary exclusion will occur
- Build in supports for the child, such as counseling, mentors, voluntary time-outs

Enforcement

- In addition to due process, IDEA can be enforced through complaints to the SEA and the U.S. Department of Education under EDGAR. When these complaints are received, the agency conducts its own investigation and makes an administrative determination of compliance or non-compliance and can order corrective action.
- In addition to requesting an impartial hearing under §504, parents can also file complaints with the U.S.D.O.E. Office for Civil Rights. Currently, however, OCR is prioritizing systemic, as opposed to individual, complaints. A person can also sue in federal court for violation of §504.

IDEA or 504 – Is one better?

- IDEA has a more developed service delivery system
- IDEA provides direct state and federal financial support for covered services
- IDEA has far more detailed rules and regulations, giving parents more clarity and ability to hold the school accountable
- 504 has more flexible eligibility criteria
- 504 has a less cumbersome process for decisionmaking
- 504 eligibility may be less stigmatizing
- 504 has legal remedies that are not available under IDEA

IDEA vs. 504 – The Pros and Cons of Each Vary With Each Situation

- There is no formula or right answer for when IDEA or 504 is preferable,
- Each has advantages and disadvantages that must be considered on a case by case basis

Two Special Considerations

- In situations where the child is having behavioral challenges, IDEA generally offers more detailed requirements for evaluation, behavioral intervention and procedural safeguards
- In situations where parents are requesting a due process hearing, IDEA's hearing procedures are generally more detailed and involve a more independent hearing process

Sources of information

- See the Pacer Website: www.pacer.org.
- On IDEA, get the regulations at www.edpubs.org
- www.ldonline.org
- Get information from the US DOE at:
- www.ed.gov/parents/needs/speced/resources.html
- Get wide information on all special ed issues at: www.nichcy.org (National Information Clearinghouse for Handicapped Children and Youth)

Sources of information on Section 504

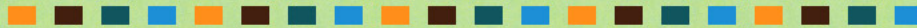
- For information on the Section 504 rules, check www.ed.gov/print/about/offices/list/ocr/504faq.html
- Also check www.nichcy.org
- Also see our website at www.monahan-cohen.com

For more detailed information-
See my new book:

- “A Guide to Special Education Advocacy-
What Parents, Advocates and Clinicians
Need to Know,” by Matt Cohen, Jessica
Kingsley Press, January, 2009
- Can be ordered through our website at
www.monhan-cohen.com
- by contacting Tami Kuipers at
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- Or at 312-419-0252.



Section 504 and The Americans with Disabilities Act Amendments Act:



ALLIANCE Webinar
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NCLD works to ensure that the nation's 15 million children, adolescents and adults with learning disabilities have every opportunity to succeed in school, work and life.

NCLD

- * Provides essential information to parents
- * Develops and delivers programs for early identification, intervention and support
- * Advocates for policies to strengthen and promote educational opportunities.



Chairman George Miller

“an individual with an impairment that substantially limits a major life activity should not be penalized when seeking protection under the ADA simply because he or she managed their own adaptive strategies or received informal or undocumented accommodations that have the effect of lessening the deleterious impacts of their disability.”
(House Report, 9-17-08)

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More Facts

- 1 in every 400-500 students has diabetes (ADA, 2008)
- 8.9 percent of children have asthma (NCHS, 2005)
- 5 percent of school-age children have LD (USED, 2007)
- 7 percent of children ages 6-11 have AD/HD (with or without an LD) (CDC, 2002)
- 54% of children with AD/HD and no LD, and 61% of children with AD/HD and LD had used prescription medication (not necessarily stimulants) on a regular basis. (CDC, 2002)

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What We Know About 504

- 1.2% of students on average nationwide have 504 plans (Zirkel et.al. 2008)
- In 1994:
 - only 14 states had established 504 policies and procedures
 - NO state collected student data (Zirkel et.al. 2008)
- In 2004: 407,923 students had 504 plans or use 504 accommodations.
(US DOE sampling of 6,000 school districts)

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What We Know (cont.)

- 80% of 504 students have ADHD
- 24% of 504 students have diabetes
- 19% of 504 students have asthma
- 19% of 504 students have dyslexia
(note: could select more than one impairment)
- 54% of determinations for 'substantial limitation' used mitigating measures as a factor
- 55% of respondents incorrectly use 'individual child's potential' rather than 'average child in the nation' to make a decision
- 3.3% of respondents used legally correct practices for determining substantial limitation

(Zirkel et.al. 2008) 6

Executive and Judicial Decisions

- Recipients of federal funds (e.g. IDEA stimulus) must be in full compliance with civil rights laws
- *Forest Grove* may have a direct impact on future IDEA eligibility decisions and/or Sec. 504 plans
- The new IDEA regulation on 'revocation of parental consent' may impact how/when 504 is offered to support the child
- The Equal Employment Opportunity Commission's (EEOC) regulation, which defines substantially limited in reference to an 'average person's performance of the same major life activity' will be revised under new ADAAA.

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No New Regulations

The ADAAA intends to expand eligibility and coverage; however, while new regulations are forthcoming from the EEOC, Congress has urged the Office for Civil Rights to maintain the current regulations and guidance related to Section 504.

Bottom Line: Parents will need to advocate for their children's rights and schools are obligated to ensure their current policies and practices are in full compliance with the new law

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Congressman Courtney (D-CT)

“This bill continues to reinforce...the determination of whether an impairment substantially limits a major life activity is to be made on an individualized basis.”

There should be no attempt to discriminate against a class of individuals based on any one disability.” (House Report, 9-17-08)

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Open Questions

Q: Will more students have access to 504 Plans?

A: It depends on the school district and whether they have been expansive or stingy.

Q: What about students currently receiving ‘informal’ accommodations?

A: Congress intends for them to have legal protection. This is stated in the Congressional Statement of the Managers.

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Question: My child is receiving informal accommodations that the teacher or other school personnel (e.g. counselor, nurse) are providing. Should I request to formalize these accommodations through a 504 plan?

Answer: Yes. By documenting that the child has a disability which substantially limits a major life activity (e.g. learning, concentrating, other), you are ensuring the legal protections provided by federal law. You are also providing documentation in the case of transition to a new school/setting, teacher changes or other life event.

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Question: My child was previously found ineligible for services under IDEA and a 504 plan was not discussed at that time. Since ADAAA has broadened eligibility requirements, should we request a reevaluation?

Answer: Yes, if you believe your child could benefit from a 504 plan. Because of the similarities between the IDEA and Section 504 'child find' requirement, schools should begin to pay particular attention to students found ineligible for services under IDEA and be willing to discuss whether a 504 plan is appropriate for the child.

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Question: My child was previously found ineligible for a 504 plan. Should we request another evaluation?

Answer: Yes, especially if you believe the denial was directly related to the 'old' interpretation of the law (e.g. finding that there was no substantial limitation of a major life activity or denial due to use of a mitigating measure such as medication).

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Question: My child has been eligible for services under IDEA and now the school proposes to end that eligibility. Should there be a discussion about a 504 plan?

Answer: Yes. There are a substantial number of children (3% or 66,000) that are declassified each year. It's very likely that many of these children need accommodations for both classroom and testing in order to be successful in general education.

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Question: My child has a 504 Plan and is applying to college. What are the most important steps in assuring she gets what she needs in the new setting?

Answer: Because each college establishes its own procedures based on its interpretation of the ADAAA and Section 504, it is important to check with the college about its policies. As part of the planning process, talk with your high school counselor on how to gather and understand the documentation your child will need.

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ADAAA and SLD

“ ...we also want to illuminate one area which may be easily misunderstood, with respect to individuals with specific learning disabilities. When considering the condition, manner, or duration in which an individual with a specific learning disability performs a major life activity, it is critical to reject the assumption that an individual who has performed well academically cannot be substantially limited in activities such as learning, reading, writing, thinking, or speaking.

(ADAAA Statement of the Managers, U.S. Congressional Record, 2008)

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Question: How does the new law affect adults that need testing accommodations on graduate level/other exams?

Answer: Congress intends for any qualified individual to have access to testing accommodations. Congress also stated: "...testing entities may establish appropriate and reasonable documentation requirements related to the determination of disability, as is true under current law."

(U.S. House Report, 2008)

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"The ADA's goal is not equal test scores,
but equal *opportunity*."

(JoAnne Simon, Esq., before the U.S. Senate HELP Committee, 2008)

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Opportunities for PTIs

- Develop a training toolkit to use with parents
- Offer to collaborate with your state department of education on updating guidance to LEAs
- Engage with coalitions and national organizations to:
 - Ask hard questions of schools, districts and states
 - Make recommendations to Congress and the Administration (e.g. more research and monitoring compliance on Sec. 504)

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Opportunities for Schools

- Give Sec. 504 careful attention
- Establish clear Sec. 504 policies and procedures -- separate and distinct from special education policies and procedures
- Train school staff
- Communicate more effectively with parents to help clarify potential confusion with pre-referral and/or school-wide early intervention programs (e.g. RTI, PBIS, other)

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Resources

- Section 504 and Public Schools: A National Survey... Rachel A Holler; Perry A Zirkel, *National Association of Secondary School Principals. NASSP Bulletin*; Mar 2008; 92, 1; Research Library, pg. 19
- ADAAA Webinar with Matt Cohen (sponsored by NCLD and CHADD)
Archive: <https://cc.readytalk.com/play?id=0ggjuljg>
Handout: <https://cc.readytalk.com/cc/download/schedule/vq38dqvr8px>
- Protecting Students with Disabilities
<http://www.ed.gov/about/offices/list/ocr/504faq.html>
- Advocating for the Child with Diabetes
<http://journal.diabetes.org/diabetesspectrum/99v12n4/pg230.htm>
- Parent Advocacy Brief: Transition to College
<http://www.nclد.org/publications-a-more/parent-aamp-advocacy-guides/transition-to-college-strategic-planning>

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Contact: Laura Kaloi – lkaloi@nclد.org

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