

School Counselors' Roles, Beliefs and Practices Related to Section 504: Results of a National Survey

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School counselors are responsible for providing services to all students, including those eligible under Section 504 of the Rehabilitation Act, through a comprehensive school counseling model. This study using survey methodology examines the roles, practices and beliefs of school counselors in relation to Section 504, focusing on differences based on Title I status and geographic setting. A national survey of school counselors ($N = 609$) revealed that 90% serve as case managers for Section 504 plans, with only 17.9% working solely in a consultation and collaboration role in eligibility determinations. Additionally, 31% reported involvement in Section 504 disputes (due process, Office of Civil Rights (OCR) investigations, district grievances). The majority of counselors (73.1%) agreed that managing 504 plans creates a dual role, while 59.8% reported that this responsibility limits their ability to implement a comprehensive counseling program. Inferential analysis showed significant differences in beliefs about equitable access to 504 eligibility, with counselors in Title I schools more likely to report equitable access. Implications of practice and future research directions are discussed within.

Keywords: school counselor, Section 504, role, scope of practice, equitable beliefs

School counselors (SCs) play an essential role in supporting the educational and developmental needs of all students, including those with disabilities (American School Counselor Association [ASCA], 2022a). SCs design and implement comprehensive school counseling programs (CSCPs) that address the holistic needs of every student (ASCA, 2023a). Within these programs, SCs serve as advocates for equity, ensuring that students with disabilities receive appropriate services and accommodations. Federal laws such as the Section 504 of the Rehabilitation Act of 1973, mandate that students with disabilities receive accommodations to access education equitably (Rehabilitation Act, 1973). However, unlike the Individuals with Disabilities Education Improvement Act (IDEA, 2004), which is federally funded and supports structured special education services, Section 504 is an unfunded civil rights statute implemented within general education settings. This distinction creates variability in how accommodations are managed within

schools, often placing SCs in roles that may conflict with their professional training and ASCA's position on working with students with disabilities. Given these challenges, this study utilizes a national survey to examine school counselors' roles, beliefs, and practices related to Section 504. By providing new quantitative insights, this study aims to identify systemic challenges and opportunities for reform, particularly in relation to school economic status (Title I vs. non-Title I schools).

Section 504 and SCs

Students with disabilities receive services under two legislative statutes: the Individuals with Disabilities and Education Improvement Act (IDEA, 2004), a federally funded statute, and the Section 504 of the Rehabilitation Act of 1973, a civil rights statute. According to the most recent data released by the U.S. Department of Education Office for Civil Rights (2024), of the 49.2 million students enrolled in public schools, 8.4 million students (17 %) were identified as having a disability. Of these students identified with a disability, 6.8 million (14%) qualified for services under IDEA and 1.6 million (3%) were served solely under Section 504. IDEA (2004) requires students to meet eligibility under one of 13 disability categories to receive special education services. As a result, these narrowed categories often overlooked students with disabilities who did not meet IDEA criteria but still required protections for equitable access (Zirkel & McGuire, 2010; Zirkel, 2023). In contrast, Section 504 provides a broader framework. Section 504 mandates that schools identify and evaluate students whose disabilities substantially limit one or more major life activities (Zirkel, 2023). Although Section 504 is intended to protect all eligible students, its broad eligibility criteria and non-funded nature disproportionately benefit families with greater social capital, leaving underrepresented students at a disadvantage (Lewis & Muñiz, 2023).

Prior to the passage of the Americans with Disabilities Act Amendments Act (ADAAA, 2008), Section 504 was also more narrowly defined in terms of limitations to major life activities (Zirkel & McGuire, 2010; Zirkel, 2023). The passage of the ADAAA expanded eligibility for disability protections. For example, it recognized thinking and concentrating as impairments which can limit a major life activity, and it introduced a non-exhaustive list of disabilities to ensure broader eligibility (Zirkel, 2023). The Office for Civil Rights (OCR) issued guidance to further define and interpret these changes, ensuring their consistent implementation in educational settings (U.S. Department of Education, OCR, 2016). According to OCR guidance, the eligibility process involves (1) identifying students who may have a disability, (2) conducting an evaluation that is not limited to academic performance alone, (3) making an eligibility determination based on whether the impairment substantially limits a major life activity, and (4) ensuring access to accommodations and services without considering mitigating measures such as medication (OCR, 2016). The ADAAA (2008) expanded the scope of Section 504, emphasizing a broader and more inclusive approach than IDEA. This expansion ensures that students who may not qualify for special education services under IDEA still receive the necessary support to equitably access their education (Zirkel & Weathers, 2016). While the passage of the ADAAA expanded access to Section 504 services, disparities exist in who benefits from these protections (Lewis & Muñiz, 2023; Zirkel & Gullo, 2024; Zirkel & Weathers, 2016). Although White students make up 46% of the total K-12 population, they account for 60% of Section 504 recipients (OCR, 2024). In contrast, Black and Hispanic students, who make up 15% and 28% of the population are underrepresented at 12% and 21% respectively (OCR, 2024). Similarly, English Learners account for 11% of student enrollment but only 5% of those served under Section 504 (OCR, 2024).

Furthermore, due to the non-funded nature of Section 504, implementation occurs in general education settings without support from special education programs (Zirkel, 2016). This lack of funding has created a gap in the personnel responsible for managing services, often resulting in SCs taking on the coordination and oversight of accommodations (Goodman-Scott & Boulden, 2019; Madaus & Shaw, 2008). According to the position statement *The School Counselor and Section 504 Plan and Process* (ASCA, 2024), ASCA states that SCs role within the 504 process is to serve as part of the school's multidisciplinary team, acting on behalf of students through advocacy, collaboration, and consultation. It further clarifies inappropriate roles and scope of practice. For example, SCs should not make singular decisions related to 504 plans, serve in any supervisory capacity, or write Section 504 plans (ASCA, 2024).

Despite ASCA's clear guidance that SCs should not act as case managers or assume administrative duties for Section 504 plans, studies suggest that SCs frequently fill these roles due to gaps in assigned personnel inconsistencies (Goodman-Scott & Boulden, 2019; Madaus & Shaw, 2008). This misalignment with professional expectations presents multiple challenges for SCs, particularly as the number of students qualifying for Section 504 accommodations continues to rise. SCs often feel inadequately prepared to support students on Section 504 plans, citing limited training both during their graduate programs and on the job (Goodman-Scott et al., 2018; Kolodinsky et al., 2009; Romano et al., 2009). Goodman-Scott and Boulden's (2019) qualitative research further highlights key challenges including the time-intensive nature of case management, strained relationships due to dual-role conflicts, and insufficient training for navigating legal and procedural complexities. Additionally, the lack of standardization in Section 504 procedures contributes to confusion and inequity in service delivery, disproportionately affecting historically marginalized students (Lewis & Muñiz, 2023). In their analysis, Lewis and Muñiz (2023) found that Section 504 plans are disproportionately concentrated in wealthier, often suburban school districts, and underrepresented in high-poverty (Title I) schools, particularly those in urban and rural areas. This suggests that implementation of 504 policies may vary significantly by district context, making geographic location and socioeconomic status important variables to explore. While Lewis & Muñiz (2023) identified patterns of disproportionality, their work did not explore the intersection of school counselors, including the impact of roles, practices and beliefs in relation to their findings. The ASCA code of ethics provides guidance that SCs should be advocates for students found in systems of inequalities, and this is further solidified in the ASCA position statement that provides guidance of SCs as advocates for students with disabilities (ASCA, 2022a; ASCA, 2022b). Building on these findings, it is essential to examine SCs roles, beliefs, and practices in relation to Section 504 inequities and implementation. Research has underscored the importance of aligning SCs' responsibilities with their professional training to ensure equitable service delivery (Goodman-Scott, 2015; Watkinson et al., 2018). However, the existing literature on SCs' work with students with disabilities is sparse, particularly regarding Section 504. A content analysis of the first ten years of *Professional School Counseling* found that less than 10% of published manuscripts focused on students with disabilities (Falco et al., 2011). A more recent follow-up study by the same lead author categorized disability-related research within a broader multicultural issues category, which also encompassed topics such as LGBTQ+ students, racial and cultural identity, students in complex circumstances (e.g., homelessness, incarcerated parents, undocumented status), and social justice themes. Collectively, these topics accounted for 13% of published manuscripts (Falco et al., 2025). While this categorization reflects the growing emphasis on diverse student needs, it also suggests that scholarship specifically addressing students with disabilities and school counselors may receive less focused attention, highlighting a gap in the

literature. A broader review of the literature at the time of this study revealed a significant gap in research examining school counselors' roles, beliefs, and responsibilities in supporting students under Section 504, with no quantitative studies conducted since the implementation of the ADA of 2008. Additionally, no studies were found exploring school counselors' beliefs about equity in Section 504 implementation. Prior to conducting this study, a comprehensive review of counselor education journals identified only one publication in the past decade that examined school counselors' and Section 504 (e.g., Goodman-Scott & Boulden, 2019). By the study's completion, a second article by the same authors had been published (e.g., Boulden & Goodman-Scott, 2024). To develop a more comprehensive understanding of Section 504, particularly in the context of the ADA, it was necessary to expand the literature review beyond counseling journals and incorporate older research. This broader approach contextualizes the increase in incidence of Section 504 eligibility, a critical factor that has not been adequately addressed in recent studies on school counselors and Section 504.

The Current Study

Following the conceptualization and launch of this project, Boulden and Goodman-Scott (2024) published the School Counselor Roles and Activities Instrument, a tool designed to categorize SC engagement in Section 504-related activities. Our study compliments this foundation by employing a national survey to examine the frequency, perceptions, and systemic factors influencing school counselors' roles, beliefs, practices and advocacy in the 504 process. This distinction is critical, as our findings contribute empirical data to the broader discussion on school counselors' responsibilities, policy compliance, and equity in Section 504 implementation. Given the limited empirical research on this topic, our study provides much-needed quantitative insights into SCs' engagement with Section 504. The authors conducted a national survey to examine SCs' experiences with Section 504 from a quantitative perspective. Specifically, the study aims to (a) explore the frequency and incidence of SCs' roles and scope of practice in working with students on 504 plans, (b) investigate their beliefs regarding Section 504 training, implementation, and equity, (c) assess their compliance with current Section 504 laws, and (d) identify differences in roles, beliefs based on geographic location, and economic status of schools as determined by Title I classification. The current study builds on prior qualitative findings and offers new quantitative insights into the systemic challenges and opportunities for reform. By assessing the intersection of training, equity, and practice, this study contributes to a deeper understanding of how SCs can better serve students with disabilities while adhering to their professional standards. The research questions for this study were as follows:

1. To what extent do school counselors engage in specific roles and practices related to Section 504 plans, and how frequently do they perform these responsibilities?
2. To what extent do school counselors endorse beliefs related to Section 504 training, implementation fidelity, and access?
3. To what extent do school counselors comply with current Section 504 requirements in their daily practice?
4. Do school counselors' roles and beliefs of Section 504 differ significantly based on geographic location (rural, urban, suburban) and school socioeconomic status (Title I vs. non-Title I)?

Method

Our survey design was based on the methods used in previous national surveys by Swank and colleagues (2019), who studied school counselors' perceptions of their roles in bullying prevention, and by Joe et al. (2023), who examined school counselors' beliefs, attitudes, and professional behaviors related to sexual health and HIV prevention. Similarly, Brown and Armstrong (2022) conducted a survey exploring school counselors' use of ethical decision-making models, underscoring the importance of structured frameworks in guiding professional responsibilities. Building on these frameworks, we adapted a similar methodology to investigate school counselors' roles, beliefs, and practices within Section 504.

Procedure

We recruited a nationwide sample of SCs to ensure diverse representation across geographic locations, school economic statuses (Title I vs. non-Title I), and school types (urban, suburban, rural). We administered the survey in early Fall 2024 and kept it open for 25 days to increase the caliber of rigor (Griffith & Villares, 2023). We used a non-probability convenience sampling method, combined with snowball sampling, to enhance response rates. After obtaining Institutional Review Board (IRB) approval, we distributed the study announcement via social media platforms, various state counseling associations, and professional contacts across several states. The announcement included a URL and QR code directing participants to the online Qualtrics survey. Before starting the survey, participants were required to provide informed consent and confirm that they were licensed or credentialed, practicing SCs. We redirected those who did not consent or meet the criteria to the end of the survey. Participants were given the option to enter a drawing to win one of two \$100 Visa gift cards as an incentive.

Participants

The study initially included 855 participants. We applied listwise deletion to remove cases with incomplete or missing data, resulting in a final sample of 609 participants. To ensure the study had sufficient power to detect meaningful effects, we conducted a power analysis using G*Power software (Creswell & Guetterman, 2025). For the ANOVA, the analysis was based on a priori criteria, with an alpha level of 0.05, a power of 0.95, and a medium effect size (Cohen's $f = 0.25$). GPower indicated that a minimum of 252 participants were needed for the ANOVA. With a final sample of 609 participants, the study exceeded the required sample size, ensuring sufficient power to detect significant differences in SCs' roles and beliefs regarding Section 504 for the analysis.

The majority of participants identified as female ($n = 570$, 93.6%), followed by male ($n = 35$, 5.7%), non-binary/third gender ($n = 2$, .2%), and two participants (0.3%) who preferred not to disclose their gender. Participants represented various school settings, including suburban schools ($n = 271$, 44.5%), rural schools ($n = 188$, 30.9%), and urban schools ($n = 132$, 21.7%). Eighteen participants (2.9%) selected two geographic settings. While their responses were retained for analyses related to Research Questions 1 through 3, they were excluded from the geographic region analyses in Research Question 4 to ensure mutually exclusive group comparisons. Regarding the socioeconomic status of the schools, we asked participants to indicate whether their school district was classified as Title 1, with those responding yes ($n = 360$, 59.1%), those responding no ($n = 223$, 36.6) and those not sure ($n=26$, 4.3%). Almost the entire sample worked in public schools ($n = 590$, 93.6%), with participants in charter schools (n

= 21, 3.4%) and private schools ($n = 15$, 2.5%). In terms of experience working as a SC, participants reported 8 years or more ($n = 338$, 55.5%), 3–4 years ($n = 106$, 17.4%), 5–7 years ($n = 93$, 15.3%), and 1–2 years ($n = 72$, 11.8%). A majority of participants reported graduating from a program accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) ($n = 498$, 81.8%). Of those who completed a course focused on special education as part of their graduate studies, participants reported yes ($n = 291$, 47.7%), no ($n = 284$, 46.6%), and unsure ($n = 34$, 5.5%). Additionally, participants reported engaging in professional development or post-graduate training related to Section 504 content or students with disabilities ($n = 386$, 63.4%) or not ($n = 223$, 36.5%). Regarding counselor-to-student caseload, participants reported a caseload consistent with the ASCA recommended ratio of 1:250 ($n = 211$, 34.6%), while many more surpassed this, 1:500 ($n = 337$, 55.3%), 1:750 ($n = 43$, 7.1%), and exceeding 750 students (17, 2.8%). Participants reported having 20 or more 504 plans within their caseloads ($n = 260$, 42.7%), 16–20 plans ($n = 119$, 19.5%), 11–15 plans ($n = 106$, 17.4%), 6–10 plans ($n = 72$, 11.8%), 1–5 plans ($n = 49$, 8%), and no plans ($n = 3$, .5%).

Survey Instrumentation

At the time of this study, a thorough review of school counseling journals revealed a lack of recent psychometrically validated instruments assessing school counselors' roles, competencies, and scope of practice related to Section 504. The most relevant research, conducted over 15 years ago, focused on survey instrument development before the ADA (Romano et al., 2009). Given the recent publication of the ASCA position statement on Section 504 and the four themes identified by Goodman-Scott and Boulden (2019), the first author recognized the need for a new survey instrument to examine the frequency and incidence of school counselors' roles, responsibilities, and beliefs regarding Section 504 of the Rehabilitation Act of 1973. As a result, the first author developed and piloted a new survey instrument for this study. It is important to note that Boulden and Goodman-Scott's (2024) instrument was published after the conclusion of our study. We believe our survey developed in this study complements the work of Boulden and Goodman-Scott (2024).

Utilizing survey development procedures outlined by Creswell and Guetterman (2024) and an extensive literature review, we developed stem questions to align with the four themes and ten sub themes identified in Goodman-Scott and Boulden's (2019) qualitative research and informed by Role Theory (Kahn et al., 1964). Additionally, the questions were informed by the ASCA position statement on school counselors and Section 504, as well as research by Lewis and Muñiz (2023) on inequitable access and the misuse of Section 504. Further, literature on Section 504 compliance, policy interpretations, and prior surveys contributed to the instrument's development (Holler & Zirkel, 2008; Madaus & Shaw, 2008; Romano et al., 2009; Zirkel, 2011; Zirkel, 2023). Following the literature review, the first author generated 41 initial questions based on the qualitative themes from Goodman-Scott and Boulden (2019). Each question was then systematically coded according to one of the four themes or ten subthemes to ensure alignment with the literature. For example, the item "I believe my role in relation to Section 504 creates a dual role" was coded under the theme of *Relational Strain with Teachers, Students, and Families*, as identified by Goodman-Scott and Boulden (2019).

Validity

To establish content validity, we followed a process consistent with Poynton's (2023) recommended steps for construct validity. The first author sought feedback from a designated panel of school counselor educators and practitioners affiliated with the School Counseling Interest Network Disabilities Group. Two panel members, both holding doctoral degrees, had extensive experience as currently practicing or former school counselors working with Section 504 and had taught counselor education courses specifically focused on disabilities. This expert panel reviewed and provided targeted feedback on question construction, content validity, and usability, leading to key revisions in the survey. Based on their recommendations, several questions, particularly those related to school counselors' beliefs about equity and advocacy, were refined, while items concerning diagnosis were removed to maintain alignment with school counseling roles. The recommendations of the panel resulted in a survey of 32 questions not including demographics. Following these revisions, the updated survey was sent to a practicing school counselor with extensive Section 504 experience who was completing her doctoral program. Her feedback on clarity and structure further informed final refinements to wording and question organization, resulting in the finalized survey instrument.

The revised survey was divided into four sections. The first section includes 14 questions related to participants' demographic information and areas of practice. The second section contains 18 questions about the roles of SCs in working with Section 504. To gather behavioral data regarding SC roles, frequency responses were used, anchored with the terms "Never," "Sometimes," "Often," and "Always." This scale enables the measurement of response frequency, facilitating the analysis of trends in SCs' roles concerning Section 504. The third section focuses on processes and compliance that SCs report in their work with Section 504, and includes 6 questions that measure the frequency with which SCs follow specific procedures related to Section 504. This section uses ordinal frequency responses to capture the extent of SCs' engagement in Section 504 compliance. The final section assesses SCs' beliefs regarding Section 504, and includes 8 questions that utilize a 5-point Likert scale ranging from "strongly disagree" to "strongly agree."

Reliability of Survey

Although this survey follows a methodology similar to prior research (e.g., Joe et al., 2023; Swank et al., 2019), which did not conduct reliability studies, we elected to assess internal consistency to demonstrate methodological rigor. Given that the survey measures discrete behaviors and task frequencies over three broad areas, rather than a single underlying construct, Cronbach's Alpha may not be the most appropriate metric as a singular reliability measure. Instead of calculating reliability for the entire survey, we conducted Cronbach's Alpha separately for each of the three sections. This approach ensures methodological rigor while acknowledging that variations in responses likely reflect professional role differences rather than measurement error. Internal consistency for Section II: Roles was assessed using Cronbach's alpha, yielding a reliability coefficient of $\alpha = .627$ (standardized $\alpha = .653$). For Section III: Compliance, Cronbach's alpha indicated $\alpha = .701$ (standardized $\alpha = .729$), suggesting acceptable reliability. Section IV: SC Beliefs yielded $\alpha = .473$ (standardized $\alpha = .460$), indicating lower internal consistency. While reliability varies across sections, a factor analysis could potentially realign item groupings. However, such an analysis extends beyond the scope of this study and will be addressed in the limitations and future research sections.

Data Analysis

Data analysis was conducted using IBM SPSS Statistics. We addressed the first three research questions using descriptive statistics to examine the roles and responsibilities of SCs in relation to Section 504, their beliefs about training, equity, and implementation, and the extent to which SCs comply with current Section 504 law and guidance in their daily practice. For the fourth research question, we explored differences in SCs' roles and beliefs related to Section 504 by analyzing responses to specific questions. Regarding roles, participants were asked whether they currently served as Section 504 case managers responsible for updating plans, distributing them to teachers and families, and communicating updates and changes. Responses to this item were categorical (Yes/No). Participants were also asked how frequently they participated on Section 504 eligibility determination teams in a consultative or collaborative role, rather than as managers or coordinators. This item was measured on a 5-point frequency scale: "Never," "Once in a while," "Fairly often," "Frequently," and "Always or almost always." For beliefs, participants indicated their level of agreement with two statements: (1) "My school implements 504 eligibility in a fair and equitable way," and (2) "Students without strong parent or guardian advocates have the same access to Section 504 eligibility as those with strong advocates." These items were measured using a 5-point Likert scale (1 = Strongly Disagree to 5 = Strongly Agree). Differences in participants' roles and beliefs were analyzed based on (a) the geographic location of the school (urban, suburban, rural), and (b) the economic status of the school population, using Title I designation as a proxy for socioeconomic status.

A chi-square was utilized to examine differences in roles and one-way ANOVAs were used to examine differences in beliefs for the analysis of research question four. According to Warner (2013), one-way ANOVAs require several assumptions to be met. In this study, assumptions for each one-way ANOVA were assessed through visual inspection of histograms, the Kolmogorov-Smirnov and Shapiro-Wilk tests of normality, and Levene's test for homogeneity of variance. Histogram review indicated that the distributions of belief scores were approximately normal across groups, with no substantial skewness, kurtosis, or outliers observed. Although the Kolmogorov-Smirnov and Shapiro-Wilk tests indicated statistically significant deviations from normality, research suggests that such violations have minimal impact on statistical analyses when sample sizes are large (Barri, 2019). With a sample of 609 participants, the study had sufficient statistical power to conduct robust inferential analyses. To further strengthen the validity of the findings, a bootstrapped one-way ANOVA with 1,000 resamples was conducted using the bias-corrected and accelerated (BCa) method. Results from the bootstrapped analysis were consistent with the standard ANOVA, reinforcing confidence in the conclusions despite minor deviations from normality. Additionally, Levene's test for homogeneity of variance was conducted, and results for significant findings are reported below.

Results

Research Question 1

The authors employed descriptive quantitative analysis to address the first research question: To what extent do school counselors engage in specific roles and practices related to Section 504 plans, and how frequently do they perform these responsibilities?

The complete results are presented in Tables 1 and 2. Key findings from these tables are highlighted below. The majority of respondents (90%) reported currently serving as Section 504 case managers, while 10% indicated they do not. The survey also examined SCs' roles in Section 504 eligibility determination, specifically in consultation and collaboration rather than in managerial or coordinative roles. Only 17.9% of respondents indicated they "always" serve in this capacity, whereas nearly half (47.8%) reported they "never" do so. (SCs) were asked about their roles in advocating for the implementation of Section 504 plans as written, as well as their involvement in ensuring enforcement of those plans. Regarding the implementation of 504 accommodations, 53% of counselors reported "always" advocating for accommodations to be

Table 1
Roles and Scope of Practice with Students and 504s

Scope of Practice	Always	Frequently	Fairly Often	Once in a While	Never
Write 504 accommodation plans	58.8	10.5	9.9	9.9	13.5
Advocate for students' 504 eligibility	37.4	25.5	19.7	15.9	0.8
Plan, coordinate and implement 504 eligibility meetings	61.4	8.4	5.4	8.5	15.9
Provide counseling services as part of a 504 plan	7.4	8.2	10.2	31.5	42.4
Participate in Manifestation Determination processes	23.0	6.9	5.4	30.9	23.2
Serve in consultation roles on 504 eligibility teams	17.9	12.2	8.0	14.0	47.8
Serve in consultation roles on 504 eligibility teams	17.9	12.2	8.0	14.0	47.8
Provide Tier II/III counseling services outside 504 plans	19.5	20.5	21.0	23.2	15.6
Advocate for accommodation fidelity in 504 plans	53.0	24.0	13.8	7.1	1.8
Enforce accommodation fidelity in 504 plans	41.0	18.1	13.1	11.8	15.1
Collaborate with teachers on interventions	40.1	23.8	18.4	14.6	3.0
Complete annual counselor/administrator meetings	22.0	8.2	5.6	16.1	48.1
Suggest 504 plans to parents	3.4	8.4	18.7	57.6	11.7

Note. This table presents school counselors' roles and scope of practice with Section 504 plans, shown as percentages of responses. All values are rounded to one decimal place; totals may not sum exactly due to rounding.

implemented as written. y contrast 41% reported "always" enforcing these accommodations. However, 15.1% indicated they "never" enforce them. In terms of involvement in disputes related to 504 plans, 19.2% of respondents had been involved in a dispute once, and 11.8% had been involved more than once. The majority of respondents (69%) reported never having been involved in any disputes.

Table 2
Case Manager of 504s as Reported in Scope and Practice

Role	Frequency	Percent
School Psychologist	18	3.0
Special Education Teacher	14	2.3
Administrator	74	12.2
School Counselor	436	71.6
Social Worker	4	0.7
Instructional Coach	4	0.7
Special Education Coordinator	27	4.4
Teacher	6	1.0
Other	26	4.3

Note. This table presents school counselors' roles and scope of practice with Section 504 plans, shown as percentages of responses. All values are rounded to one decimal place; totals may not sum exactly due to rounding.

Research Question 2

The authors used descriptive quantitative analysis to explore the second research question: To what extent do school counselors endorse beliefs related to Section 504 training, implementation fidelity, and access? The full results are found in Table 3. We will highlight key findings that will also be addressed in the discussion section. A slight majority of respondents felt adequately knowledgeable and trained for their role, with 23.8% "strongly agreeing" and 26.8% "agreeing" with the statement. However, 18.2% "disagreed" and 11.7% "strongly disagreed," indicating a notable proportion of counselors who feel unprepared. Additionally, 17.6% were "neutral" on the matter, and 2% were "not sure." A majority of respondents felt that their master's program did not adequately prepare them for working with 504 plans. Only 2.5% "strongly agreed" and 5.9% "agreed" that they received adequate training, while 30.4% "disagreed" and 51.4% "strongly disagreed" and 9.9% were "neutral." When asked if they had the necessary legal and ethical training for their role, only 16.9% "strongly agreed" and 26.3% "agreed." In contrast, 22.5% "disagreed" and 15.9% "strongly disagreed," suggesting that a significant number of counselors feel underprepared in this area. Another 17.7% were "neutral," and 0.7% were "not sure."

Questions related to beliefs around implementation highlighted that the majority of respondents felt that their role in relation to 504 plans creates a dual role, with 41.4% "strongly agreeing" and 31.7% "agreeing." However, 12.6% were "neutral" on this issue, and 13% either "disagreed" or "strongly disagreed" and 1.6 reported being "unsure." SCs reported that their role in managing 504 plans often inhibits their ability to implement a CSCP. Of the respondents, 34.2% "strongly agreed" and 25.6% "agreed" with this statement. A smaller proportion 15.4% "disagreed"

and 6.1% "strongly disagreed," while 17.1% remained "neutral" and 1.5% "were unsure."

Questions related to advocacy and access to Section 504 eligibility and implementation found that respondents expressed concern that students without strong parent advocates do not have the same access to 504 eligibility. Only 15.8% "strongly agreed" and 23.6% "agreed" that access is equal, while 31.2% "disagreed" and 16.6% "strongly disagreed." Another 11.5% were "neutral," and 1.3% were "not sure." Regarding the fairness and equity of 504 eligibility implementation, 28.2% of counselors "strongly agreed" and 39.9% "agreed" that their school implements 504 eligibility in an equitable manner. Fewer respondents expressed concerns, with 8.2% "disagreeing" and 4.4% "strongly disagreeing," while 18.4% remained "neutral."

Table 3
School Counselors' Beliefs Regarding Section 504

Belief	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not Sure
Adequate knowledge and training for role	23.8	26.8	17.6	18.2	11.7	2.0
School implements 504 eligibility fairly	28.2	39.9	18.4	8.2	4.4	0.8
Role creates a dual role	41.4	31.7	12.6	9.9	3.1	1.6
Role inhibits implementation of a comprehensive program	34.2	25.6	17.1	15.4	6.1	1.5
Legal and ethical training necessary for role	16.9	26.3	17.7	22.5	15.9	.7
Received adequate 504 training in master's program	2.5	5.9	9.0	30.4	51.4	0.0
Medical plans and 504s are different	26.3	43.5	15.4	8.7	2.3	3.6
Students without strong parent advocates have equal access	15.8	23.6	11.5	31.2	16.6	1.3

Note. Percentages reflect school counselors' responses regarding beliefs about Section 504 roles and responsibilities. All values are rounded to one decimal place; totals may not sum exactly due to rounding.

Research Question 3

The authors used descriptive quantitative analysis to explore the third research question: To what extent do SCs comply with current Section 504 requirements in their daily practice? The full results are found in Table 4. We will highlight a few key findings that will also be addressed in the discussion section. A majority of respondents (58%) reported that their schools "always" follow a standardized process for determining 504 eligibility, with an additional 18.6% reporting that this occurs "frequently." However, 5.1% indicated that their schools follow this process "once in a while," and 4.1% reported that they "never" adhere to a standardized process. Nearly half of the respondents (47.8%) stated that their schools "always" use multiple data sources when considering Section 504 eligibility, and 23.3% said this occurs "frequently." Still, a small proportion of schools rarely use multiple data sources, with 10% reporting that they do so "once in a while," and 3.8% "never" using multiple data sources for eligibility decisions. Training on Section 504 laws appears to be inconsistent across schools and districts. Only 19.7% of respondents reported that their schools "always" provide training related to 504 mandates, eligibility, compliance, and procedures. The majority of respondents (35.1%) reported that training is provided "once in a while," and

24.3% said that training is "never" offered in their schools.

Table 4
504 Compliance Practices in Schools

Scope of Practice	Always	Frequently	Fairly Often	Once in a While	Never
Standardized process for 504	58	26.8	17.6	18.2	11.7
Use of multiple data sources	28.2	39.9	18.4	8.2	4.4
Policy timeline for 504 reviews	41.4	31.7	12.6	9.9	3.1
Standardized 504 plan form for accommodations	34.2	25.6	17.1	15.4	6.1
Training on 504 mandates, compliance, and implementation	16.9	26.3	17.7	22.5	15.9
Standardized procedural safeguard notice	2.5	5.9	9.9	30.4	51.4

Note. This table shows percentages of school responses regarding 504 compliance practices. All values are rounded to one decimal place; totals may not sum exactly due to rounding.

Research Question 4

The authors conducted inferential analyses to address the fourth research question: Are there differences in roles, and beliefs based on the geographic location and economic status of schools, as determined by Title I classification? Significant results are summarized in Table 5. A Chi-Square Test of Independence was conducted to examine whether the distribution of school counselors' 504 roles (case manager vs. non-case manager) differed based on school Title I status (Title I vs. non-Title I) and the geographic region of the school (urban, suburban, or rural). Participants that were "Not sure" of their Title I status or that marked two geographic regions were removed from the analysis. No significant differences were found in roles between Title I and non-Title I schools or across geographic regions. Similarly, a one-way ANOVA revealed no significant differences in school counselors' beliefs about the fair and equitable implementation of 504 eligibility across geographic regions.

A one-way ANOVA was conducted to examine differences in SCs' beliefs about the fair and equitable implementation of 504 eligibility based on Title I status (Yes, No). Participants who were "Not sure" were removed from the analysis. Levene's test for homogeneity of variances was statistically significant, $F(1, 581) = 6.70, p = .010$, indicating a violation of the assumption. As recommended by Warner (2013), Welch's ANOVA was conducted to account for unequal variances. The Welch test indicated a statistically significant difference in beliefs based on Title I status, $F(1, 452.46) = 7.53, p = .006$. A standard ANOVA also revealed a significant effect, $F(1, 581) = 7.71, p = .006$ with a small effect size, $\eta^2 = .013$. Although the effect size was small, this finding highlights a meaningful difference in perceptions between counselors working in Title I and non-Title I schools, suggesting that counselors in Title I schools perceive their schools as implementing Section 504 eligibility more equitably.

A one-way ANOVA was conducted to examine the differences in SCs' beliefs about access to Section 504 eligibility for students with strong parent advocates compared to those without, based on their school's Title I status (Yes, No). Levene's test indicated that the assumption of homogeneity of variances was met, $F(1, 581) = 1.61, p = .204$. The analysis revealed a significant effect of Title I status on beliefs about access, $F(1, 581) = 4.490, p = .035$. The effect size, $\eta^2 = .008$, suggests a small effect. Although the effect size was small, this finding suggests that counselors in Title I schools perceive greater equity in access to 504 eligibility for students lacking strong parent advocates compared to their counterparts in non-Title I schools.

Table 5
ANOVA Summary Table

Measure	Title I		Non-Title I		F(1,581)	ƒd
	M	SD	M	SD		
Belief in Fair/equitable 504 implementation	3.92	1.07	3.66	1.13	7.71*** ^a	.013
Belief that students without strong parent advocates have equal access to 504 eligibility	3.06	1.37	2.81	1.45	4.49***	.008

Note. *** $p < .05$; ^a Welch's ANOVA was used due to violation of homogeneity of variances, $F(1, 452.46) = 7.53, p = .006$.

Discussion

Section 504 of the Rehabilitation Act of 1973 was designed to ensure equitable educational access for students with disabilities (Zirkel, 2023). However, the findings of this study highlight critical quantitative gaps in how professional SCs interpret, manage, and experience Section 504 processes, raising concerns about systemic inequities and role conflicts. These findings build on existing literature that critiques inconsistencies in the implementation of Section 504 and the misalignment of SCs' responsibilities with their professional training (Goodman-Scott & Boulden, 2019; Madaus & Shaw, 2007; Romano et al., 2009).

A central challenge revealed by this study is the inappropriate assignment of 504 case management duties to SCs. Despite ASCA's guidance against this practice, 90% of participants reported serving as 504 case managers. These responsibilities often lead to dual-role conflicts, with 41.4% strongly agreeing and 31.7% agreeing that 504 duties interfere with their counseling practice. Furthermore, over half of the participants reported always or frequently enforcing 504 accommodations, a task that may create tension with teachers and undermine collaborative relationships. These dual roles potentially expose SCs to legal risks and raise ethical questions. In our study, 19.2% of the participants reported that they were involved in a civil rights, due process, or grievance dispute related to Section 504 at least once, and 11.8% were involved more than once.

Additionally, this study highlights the significant gaps in the preparation and training of SCs. A substantial proportion (24.3%) of participants reported never receiving 504 training from their schools, and only 19.7% reported consistent training. Compounding this issue, 51.1% strongly disagreed and 30.4% disagreed that their graduate programs adequately prepared them for 504 responsibilities. These findings reflect broader trends in the literature, where SCs

consistently report feeling unprepared to address the needs of students with disabilities (Goodman-Scott et al., 2018; Kolodinsky et al., 2009; Milsom, 2002; Nichter & Edmonson, 2005). Such gaps exacerbate the discrepancy between preparation and practice, limiting counselors' ability to address systemic inequities effectively.

Another significant challenge pertains to equity in Section 504 implementation. Although 68.1% of participants perceived their school's 504 processes as fair, national data indicate that Section 504 disproportionately benefits white, affluent students (Lewis & Muniz, 2023). Zirkel (2023) attributes this to the unfunded nature of Section 504 and its broad eligibility criteria, which favor families with greater social capital. Nearly 47% of counselors reported that students without strong caretaker advocates face reduced access to 504 accommodations, underscoring barriers for marginalized families. Addressing these challenges requires a multifaceted approach. Standardized processes for determining 504 eligibility are crucial (Zirkel, 2023), yet this study found significant variability, with 58% of participants reported always using standardized procedures, and 18.6% reported doing so frequently. Similarly, while 47.8% of participants always used multiple data sources for eligibility decisions, an established policy requirement, 3.8% reported never doing so. Standardization and consistent practices can minimize legal risks and reduce inequities in implementation (Zirkel, 2023).

Furthermore, the findings underscore the need for systemic reform to better align Section 504 practices with equity and professional standards. Statistically significant differences in perceptions of equity based on Title I status suggest that socioeconomic context influences SCs' experiences. SCs in Title I schools reported more favorable perceptions of equitable implementation compared to those in non-Title I schools. This nuance highlights the potential for equitable practices in resource-constrained settings but also points to broader systemic inequities that disadvantage marginalized families. The findings of this study support the insights of Lewis and Muñoz (2023), who highlighted that families from wealthy suburban districts have greater access to resources and privileges that aid in eligibility.

Implications

Findings of this study lend preliminary support for the role of systemic inequities and role misalignment in undermining SCs' ability to deliver equitable, student-centered services within the Section 504 implementation process. This is one of the first nationwide quantitative studies to examine the roles, practices, and beliefs of SCs regarding Section 504, including their training, implementation, compliance with laws, and perceptions of equity, while exploring differences based on geographic location and school economic status. Specifically, the tension between SCs' professional responsibilities and the demands of 504 case management reflects broader systemic inequities and misalignment of roles.

SCs' contributions are most impactful when focused on advocacy, consultation, and collaboration within a CSCP which is essential for fostering equitable student outcomes (Carey et al., 2012; Lapan et al., 2012). Collaboration between SCs and administrators is necessary because administrators play a pivotal role in directing the scope of counselors' responsibilities. Positive relationships with principals significantly enhance counselors' ability to prioritize CSCP-related duties (Lowery et al., 2018). Further, when SCs are tasked with non-counselor duties, such as administrative case management, they face role conflicts and diminished capacity to meet the needs of all students (DeCino et al., 2023; Goodman-Scott & Boulden, 2019). The administrative burden of Section 504 case management, often placed on school counselors, may create ethical challenges

by limiting their ability to provide equitable academic, career, and social/emotional support and conflicting with their responsibility to prioritize direct student services over inappropriate administrative duties (ASCA, 2022b). SCs should advocate for role alignment that prioritizes their professional responsibilities as outlined by ASCA. One approach is to strategically utilize the annual administrative meeting to reinforce their appropriate role and advocate for expanded services for students protected under Section 504 within a Tier two MTSS framework (ASCA, 2019a). These services, tailored to student needs, may include individual counseling, small group interventions, transition planning, and academic support, ensuring meaningful assistance rather than solely managing case documentation and implementation. Furthermore, training gaps exacerbate these challenges. Over 81% of participants in this study indicated inadequate preparation for Section 504 during their master's programs. The lack of adequate training limits counselors' effectiveness and compels them to rely on trial-and-error methods when supporting the Section 504 process. SCs report a "lack of expertise" as a recurring issue in supporting students with disabilities (Goodman-Scott & Boulden, 2019). Previous research points to the inadequacies of counselor education programs in preparing SCs to support students with disabilities (Goodman-Scott et al., 2018; Kolodinsky et al., 2009; Milsom, 2002; Nichter & Edmonson, 2005). The lack of training may result in SCs being assigned inappropriate roles related to Section 504 case management. The Council for Accreditation of Counseling and Related Programs (CACREP) emphasizes training school counselors in a consultative and collaborative role to advocate for equity and access (CACREP, 2024). While CACREP addresses broad ethical and legal considerations, it does not provide specific, detailed guidance on K-12 disability laws such as IDEA and Section 504. It is essential for SCs to have a comprehensive understanding of Section 504, its implications within the school setting, and the appropriate roles they should assume to maximize positive outcomes for students. Counselor education programs can incorporate thorough training on Section 504, emphasizing legal, ethical, and collaborative practices that inform ASCA aligned roles. Additionally, SCs should advocate for participation in specialized training to support students with disabilities, stay informed about current laws impacting these students, and collaborate with staff who possess expertise in working with students with disabilities.

The study also highlights systemic inequities in 504 plan implementation, reflecting broader trends of privilege and access. Systemic factors such as the non-funded nature of Section 504, expanded eligibility criteria under the ADA, and limited district resources exacerbate inequities, with privileged families more effectively navigating the system to secure advantages for their children (Zirkel, 2023). Lovett (2020) highlights the variability in the efficacy and fairness of accommodations, particularly extended time, one of the most requested supports. Addressing these systemic inequities requires a critical examination of policy implementation, resource allocation, and the professional responsibilities assigned to SCs. SCs must act as advocates for systemic equity, addressing disparities in access to accommodations for marginalized populations (Lewis & Muñiz, 2023). Advocacy includes educating parents and communities, particularly those from underrepresented backgrounds, about their rights and the processes for securing 504 accommodations. While these findings have clear implications for counselor training and professional advocacy, they also point to needed changes at the systems and policy levels, particularly in how schools allocate responsibilities, define counselor roles, and structure support for equitable access to accommodations.

Implications for Policy

Building school counselors' social justice advocacy capacity in the varying levels of the school counseling ecosystem holds promise for intentional policy reform and resource allocation to improve students' equitable access to accommodations (Savitz-Romer & Nicola, 2022). School counseling policy, as it relates to equitable access to accommodations, is indirectly and directly influenced by an amalgamation of national, state, school district, and local school policies (Gay, 2021; Niles, 2022). School counseling policy reform ought to help school counselors engage in the business of building and implementing their CSCP in order to support student achievement and success in the areas of academic planning, social/personal growth, and college/career planning (ASCA, 2019a; Gay, 2021). ASCA (2022b) exhorts school counselors to "affirm the abilities of all students and advocate for their learning needs, supporting the provision of appropriate accommodations and accessibility" (B.2.k.). Relatedly, school counselors ought to "identify and advocate for resources needed to optimize and support academic, career, and social/emotional development opportunities" (A.10.c.) for historically marginalized populations of students who are eligible for services related to a section 504 Plan.

School counselor-driven policy reform that ensures equitable access to accommodations must be grounded in both professional standards and systemic awareness. This includes implementing the ASCA National Model to develop a locally responsive CSCP (ASCA, 2019a), applying the ASCA position statement on supporting students with section 504 plans (ASCA, 2024), and critically understanding how power dynamics and allocation of resources shape opportunities within schools (Young & Lewis, 2015). The school counseling ecosystem framework provides a valuable lens to contextualize and strengthen SCs' role in policy reform, particularly as it relates to equity in resource allocation and service delivery (Savitz-Romer & Nicola, 2022). One potential area for school counselor policy reform in the school counselor ecosystem lies in the microsystem, where SCs can collaborate with local school administration to advocate for more just allocation of resources and implementation (Savitz-Romer & Nicola, 2022), such as the implementation of Section 504 accommodations.

Extant literature (Gay, 2021) illuminates the need for school counselors to continuously assert their professional roles and duties and provide education on appropriate/inappropriate uses of time to their building principal and local school leadership/administration, as outlined by the ASCA National Model (2019a). The aim of school counselor advocacy for appropriate roles is to reduce school counselor to student ratios, provide a culturally sustaining CSCP, and close opportunity and access gaps for students (Grothhaus et al., 2020). Local school leadership oversees hiring decisions which inadvertently impacts school counseling roles/duties positively or negatively as related to supporting student access to accommodations. School counselors seek proximity to influence school leadership decision making through reporting results of the CSCP so as to "advocate for the proper role...to help reduce ratios, or to increase social capital" (Gay, 2021, p. 24). School counselors leverage their capacity to build professional relationships with school leadership to explore shared values for equity and meeting local school improvement goals, since building principals' perceptions and values influence local school interventions and allocation of resources related to students with disabilities' access and accommodations (O'Laughlin & Lindle, 2015; Printy & Williams, 2015). Moreover, such a collaborative dynamic between the school counselor and school leadership is beneficial for the school counselor to advocate to "remove barriers that may impede the effectiveness of the school and/or the school counseling program in promoting equitable student outcomes" (B.2.e) (ASCA, 2022b), such as inappropriate duties and high caseloads (Savitz-Romer & Nicola, 2022).

To improve resource allocation for school counselors to thereby improve students' access

to equitable accommodations requires a school leadership mindshift. An aspirational school leadership mindset toward school counselors privileges the latter's training, perspective, problem-solving skills, proactive stance, advocacy skills, and ability to affect change, particularly for students who deserve access to accommodations (ASCA, 2022a). School leadership demonstrates that they value their counselors' time by removing Section 504 case management from their duties, allowing counselors to focus on ensuring students are eligible for and equitably access accommodations from a CSCP advocacy lens. School leadership demonstrates its commitment to valuing counselors' time by removing Section 504 case management duties, enabling counselors to focus on eligibility and equitable access to accommodations through a CSCP advocacy lens. School leadership selects a trained, competent teacher leader or school administrator to oversee management of section 504 meetings and related communication/duties. School leadership decisions impact the response to intervention (RTI) and multi-tiered systems of support (MTSS) infrastructure at the local school (Printy & Williams, 2015). Therefore, a better use of school counselor time to maximize the goal of 80% of their time involved in direct services and 20% of their time focused on indirect services would be the placement of the school counselor on a RTI/MTSS local school committee as a committee member or consultant (ASCA, 2019a). Furthermore, as an RTI/MTSS committee member, the school counselor regularly analyzes school-wide data, collaborates with teachers and school leadership, and makes recommendations to promote equitable student access to accommodations (ASCA, 2019a). Supplementing beginning of the school year program planning of annual school data summary to include results from a data analysis exploring the reasons, context, and demographics for the initiation of 504 plans (i.e. student support team meeting, student transferred it from a previous school, upcoming Advanced Placement or similar tests) for the past year would provide information to the school counseling department on potential student opportunity gaps in access to accommodations. In effect, the school counseling department could incorporate interventions to close such gaps.

As a school counselor engages in social justice advocacy to improve resource allocation and equitable access to accommodations for students of marginalized backgrounds through collaboration with school leadership, their microsystem will propel student success (Lewis & Muñiz, 2023). Therefore, the school counselor's success with advocacy for equitable accommodations will be the impetus for more explorations to advance change in other areas of the school counseling ecosystem (Savitz-Romer & Nicola, 2022).

Limitations and Future Research

Although this study offers a quantitative survey perspective to complement prior qualitative research, its findings should be interpreted with consideration of its limitations. First, while the survey instrument was developed using a rigorous design process to ensure face validity, and reliability analyses were conducted to enhance methodological rigor, further research could focus on refining its psychometric properties. A follow-up study could include a more in-depth factor analysis to realign questions and further develop the survey into a more targeted and validated instrument with higher internal reliability. The results of this study should consider the moderate level of internal reliability in sections II and IV. Strengthening instrumentation in future research can enhance and extend the current survey and inferential design, allowing for a more comprehensive exploration of school counseling policy and practice implications.

Second, the study's non-experimental design and use of convenience sampling may limit the generalizability of the findings. Future research could address this limitation by employing

randomized sampling methods and intentionally targeting a more diverse population. Additionally, participants in this study may have been drawn to the topic due to personal interest, which, combined with the use of self-reported data, introduces the potential for participant bias. It is also important to delineate the nature of self-reported beliefs. While beliefs can be informed by a variety of factors, including observation, it is important to denote the distinction. In concert with this, the survey design did not investigate specific time allocations dedicated to Section 504 case management or the broader scope of SCs' responsibilities related to Section 504 time allocation. Future studies should examine these factors to gain a deeper understanding of how time allocated to Section 504 responsibilities affects the implementation of CSCP. Moreover, research could explore whether specific school counselor variables predict their ability to manage non-counseling tasks that are misaligned with their training and hinder the implementation of a CSCP. Although this survey employed a broad design, it did not capture all elements of the school environment. Future research could investigate grade-level and building-level differences to better understand SCs' experiences with Section 504.

Third, the significant findings between Title I and non-Title I schools regarding beliefs about equitable implementation of Section 504 should be interpreted with caution due to the small effect size. While the statistical significance indicates a measurable difference in perceptions, the magnitude of this difference is relatively modest. This suggests that while Title I status may be a contributing factor in shaping school counselors' beliefs about equity in Section 504 implementation, it is likely not the sole or primary influence. Though these findings provide context for understanding school counselors' beliefs about equitable access and complement the quantitative outcomes of research by Lewis and Muñiz (2023), the small effect size should be a consideration in the interpretation of these findings. The small effect size may reflect the complexity of factors that influence these perceptions, such as district policies, administrator expectations, professional development opportunities, or variations in the way Section 504 is implemented at the local level. These findings highlight the need for further research to examine these additional contextual variables and their potential impact. A mixed-methods approach may offer deeper insight into school counselors' lived experiences and help identify systemic barriers to equitable access under Section 504.

Additionally, while the survey included an item designed to collect participants' race and ethnicity, a programming limitation in Qualtrics resulted in partial data that could not be fully analyzed. The responses that were collected aligned with national ASCA demographic trends, with most respondents identifying as white (ASCA, 2023b). Although the lack of complete demographic data limits our ability to examine how counselor race may influence perceptions of Section 504 implementation, future research could explore this important factor in more depth, particularly given evidence that Section 504 disproportionately benefits white, affluent students.

Finally, it is important to recognize that survey data reflect participant beliefs and perceptions, which may not always align with actual observed practices. While self-reported data provide valuable insights into how school counselors view their roles and responsibilities, these responses do not necessarily confirm how Section 504 processes are implemented in practice. Future research could incorporate triangulated data sources, such as school policy reviews, administrator perspectives, or observational studies, to better understand how Section 504 implementation aligns with school counselors' reported experiences. Expanding data collection beyond self-reporting would offer a more comprehensive picture of Section 504 management and its impact on school counseling programs.

Conclusion

This study presents preliminary findings on school counselors' (SCs') beliefs, roles, and practices related to Section 504, highlighting systemic inequities in its implementation. Despite receiving limited training in their graduate programs, SCs are often assigned case management responsibilities, leading to role confusion and detracting from their ability to provide direct student services. Additionally, significant disparities in 504 eligibility implementation between Title I and non-Title I schools further underscore inequities in access and support. This misalignment is particularly concerning as protections for students with disabilities face increasing challenges on the geopolitical stage (*Texas v. Becerra*, No. 22-cv-185, N.D. Tex.). To best support students with disabilities served under Section 504, SCs should operate within a CSCP rather than assuming dual roles that include coordination duties. Ensuring SCs are positioned to advocate effectively and provide direct services is more critical than ever. Addressing these challenges requires a realignment of SC roles, enhanced training, stronger collaboration, and advocacy for systemic equity.

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