504 Plan vs. IEP: What's the Difference?

A practical guide for parents navigating school support plans

Start with the child, not the acronym

You have a testing report, a child who needs support, and a meeting invitation full of letters. The goal is not to become fluent in school acronyms overnight. It is to understand what your child needs and how those needs will be met.

Both Section 504 and the Individuals with Disabilities Education Act (IDEA) protect eligible students with disabilities. Both can require schools to provide a free appropriate public education, often shortened to FAPE. Their eligibility rules and procedures differ. [1, 2]

> **The useful question is: "What does my child need to access school, learn, and make appropriate progress?"**

What neuropsychological testing contributes

An evaluation can clarify strengths and difficulties in learning, attention, memory, language, and emotional or behavioral functioning. Depending on its scope, it can identify clinical conditions and recommend school supports.

The school team must consider relevant outside evaluation information, alongside school data. A clinical diagnosis does not automatically establish school eligibility or require the school to adopt every recommendation. [1, 3]

You do not have to purchase private testing before requesting a school evaluation. Schools have their own evaluation responsibilities when disability-related educational needs are suspected. [1, 4]

Scope: U.S. public K–12 schools, including public charter schools. Private schools, colleges, and preschool services have different rules. Federal framework with a Michigan timeline note. Verified October 2026.

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A 504 Plan: Removing Barriers

Law: Section 504 of the Rehabilitation Act, a federal civil rights law prohibiting disability discrimination in federally funded programs. [2]

Who may qualify?

For school services under Section 504, a student generally has a physical or mental impairment that substantially limits a major life activity, such as learning, reading, concentrating, thinking, or communicating. Eligibility is individualized. Good grades do not rule it out. [1, 4]

ADHD, anxiety, learning disabilities, autism, and medical conditions can all be relevant. The diagnosis is the starting information, not the eligibility decision. A medical diagnosis is not a prerequisite for the school to evaluate. [1, 4]

What can it provide?

A 504 plan often documents accommodations, but Section 504 can also require regular or special education and related aids and services. Calling it “just accommodations” can understate a student’s rights. [1]

• Examples might include extra time, written directions, accessible materials, movement breaks, or a low-distraction testing setting.

• Depending on evaluated needs, supports may include health services, counseling, assistive technology, or other aids and services. [1]

How are decisions made?

Evaluation and placement decisions are made by a group knowledgeable about the student, the evaluation data, and placement options. Request parent participation, share your observations, and obtain a clear written plan and procedural safeguards. [1]

> **Ask: “What barrier does this support address, who will provide it, and how will we know it is working?”**

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An IEP: Individualized Education

Law: The Individuals with Disabilities Education Act (IDEA). An IEP is the written program developed for an eligible student. [5, 6]

Who may qualify?

The student must meet an IDEA disability category and, because of that disability, need special education and related services. Categories include specific learning disability, autism, speech or language impairment, emotional disturbance, and other health impairment, which can include ADHD. State rules also matter. [5]

Special education means specially designed instruction addressing disability-related needs. A student does not have to fail classes before the school considers eligibility. Academic and functional needs both deserve attention. [6, 15]

What belongs in the IEP?

• Current academic and functional performance, measurable annual goals, and a description of how progress will be measured and reported.

• Special education, necessary related services, accommodations, program modifications, and supplementary aids and services.

• Service start dates, frequency, location, and duration, plus participation and assessment decisions. Parents are members of the IEP team. [6, 7]

An IEP is not a classroom assignment

Services may be delivered in the general education classroom, elsewhere, or in a combination of settings. Placement is individualized; IDEA requires education with nondisabled peers to the maximum extent appropriate. A paraprofessional’s support is not automatically specially designed instruction. [8]

> **Ask: “What instruction will change, who will deliver it, and what progress should we expect?”**

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The Side-by-Side Comparison

Feature	504 Plan	IEP
Legal framework	Section 504: disability civil rights protections	IDEA: special education law
Eligibility	Impairment substantially limiting a major life activity; evaluated service needs	IDEA category plus need for special education
Evaluation	Required before initial placement or services and significant placement changes	Required before initial special education services
Supports	Accommodations; may also include special education and related aids/services	Specially designed instruction, accommodations, and needed related services
Modifications	May be included when needed; not categorically prohibited	May be included when needed; not automatic
Measurable goals	No federal IEP-style annual-goal requirement	Measurable annual goals and progress reporting required
Parent role	Share information, seek participation; notice, records, and hearing rights	Required IEP team member with IDEA participation and procedural rights
Review / reevaluation	Periodic reevaluation; before significant placement changes. Annual review is common local practice	IEP review at least annually; reevaluation at least every 3 years unless parent and school agree it is unnecessary

Sources: Section 504 guidance and regulations [1, 9]; IDEA evaluation, IEP, parent participation, and reevaluation requirements [6, 7, 10, 11]. Neither plan guarantees a specific accommodation or service without considering individual needs.

Two distinctions worth remembering

Accommodation: changes how a student accesses or demonstrates learning, such as using text-to-speech when appropriate. **Modification:** changes what the student is expected to learn or demonstrate. Ask how any change affects instruction, grading, and assessment.

An IEP can address Section 504 obligations. An IDEA-eligible student generally does not need a separate 504 plan to receive accommodations. Both laws have enforceable protections; a 504 plan is not optional for staff to follow. [1]

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What This Looks Like in Real Life

Same diagnosis, different educational needs

ADHD: One student may need written directions, breaks, and testing accommodations. Another may also need explicit, individualized instruction in planning and task initiation. Evaluate the needs rather than assigning a plan by diagnosis.

Dyslexia: Audiobooks may improve access to content, but access tools alone do not teach decoding. Ask whether the student needs specially designed reading instruction, alongside accommodations.

Anxiety: A predictable check-in may help one student participate. Another may need individualized instruction and services to address disability-related educational needs. Consider attendance, participation, and functioning, not just grades.

> **“They have accommodations, but they are still not learning the skill. What instruction or services should we evaluate?”**

Make the plan specific enough to use

• Replace “breaks as needed” with a clear description of when, where, how the student requests a break, and how they return.

• Clarify “extra time”: how much, on which tasks, in what setting, and who arranges it.

• Ask what information will be collected and when the team will review effectiveness. Share the plan with staff responsible for implementation.

Think beyond this year

Under IDEA, transition goals and services must begin no later than the first IEP in effect when the student turns 16, or younger when appropriate; some states require earlier planning. These address life after high school, not just changing classrooms. [12]

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Ask Clearly.
Get It in Writing.

Request evaluation in writing, describe the concerns, and include relevant reports or examples. Ask the school to assess all suspected disability-related needs. A report, work sample, or attendance pattern can help explain the problem.

> **“I am requesting an evaluation because I am concerned about disability-related needs affecting my child’s education. Please consider eligibility under IDEA and Section 504, as appropriate, and provide the proposed evaluation plan and applicable timelines.”**

A request does not guarantee eligibility. If the school refuses, ask for the written decision, its reasons, and applicable procedural safeguards. For IDEA, prior written notice is required for a refusal to initiate evaluation. [13]

Michigan initial IDEA timeline: the district generally provides notice of its proposal or refusal within 10 school days of a written request. After receiving written parental consent, the initial evaluation and eligibility/IEP process generally must be completed within 30 school days, subject to applicable exceptions or a written agreed extension. This is not the Section 504 timeline. [14]

Ask who coordinates the plan, when services start, and what to do if they are missed. If concerns persist, request a review rather than waiting for the next routine meeting.

Sources & parent references

[1] ED/OCR: Section 504 FAPE FAQs. [2] ED: Section 504.
[3] IDEA: 34 CFR 300.305. [4] OCR: Parent and Educator Resource Guide.
[5–8] IDEA: 300.8, 300.320, 300.501, and 300.114.
[9] Section 504: 34 CFR 104.35–104.36. [10–11] IDEA: 300.324 and 300.303.
[12–13] IDEA: 300.320(b) and 300.503. [14] MDE: Initial Evaluation Procedure.
[15] IDEA: 300.39 and 300.101.
General parent education, not individualized legal advice. State and district procedures can vary.

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