

EDUCATION LAW INTO PRACTICE

PUBLIC SCHOOL RATES OF § 504-ONLY STUDENTS: THE LATEST UPDATE*

by

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In comparison to K-12 public school students eligible under the Individuals with Disabilities Education Act (IDEA),¹ students who only qualify under the broader eligibility standards of Section 504 of the Rehabilitation Act (§ 504)² receive insufficient attention. Helping to fill that gap, this article is the last in a triad of successive analyses providing updated rates of so-called “§ 504-only” students³ at the state,⁴ district,⁵ and—here—school levels based on the 2020–21 Civil Rights Data Collection (CRDC).⁶ Attributable in part to the expanded eligibility standards of the Americans with Disabilities Act (ADA) amendments that went into effect on January 1, 2009,⁷ the previous biennial analyses through 2017–18

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1. 20 U.S.C. §§ 1400–1419 (2014). For a systematic analysis of the similarities and differences between these two statutory frameworks, see Perry A. Zirkel, *The Latest Comparison of the IDEA and Section 504/ADA*, 416 EDUC. L. REP. 1 (2023). Among the key differences are that the IDEA requires (1) the need for special education as a criterion for eligibility and (2) an individualized education program (IEP) for eligible students. 20 U.S.C. §§ 1401(3)(A), 1414(d).

2. 29 U.S.C. §§ 705 and 794. In contrast with the IDEA, § 504 not only extends beyond the need for special education to various substantially impaired major life activities but also does not require an IEP or other such formal document. See, e.g., Perry A. Zirkel, *Does Section 504 Require a Section 504 Plan for Each Eligible Non-IDEA Student?*, 40 J.L. & EDUC. 407 (2011).

3. In light of the broad definition of disability under § 504 that encompasses but extends beyond the corresponding definition under the IDEA, “§ 504-only” refers to the students who qualify under the eligibility standards of § 504 but not the IDEA. More specifically, these students are typically identifiable because they have documentation commonly referred to as a 504 plan rather than the individualized education program (IEP) that the IDEA requires.

4. Perry A. Zirkel & Gina L. Gullo, *State Rates of § 504-Only Students in Public Schools: The Latest Update*, 417 EDUC. L. REP. 929 (2024).

5. Perry A. Zirkel & Gina L. Gullo, *School District Rates of § 504-Only Students in Public Schools: The Latest Update*, 418 EDUC. L. REP. 606 (2024).

6. Although having previously done so every two years, CRDC did not collect data in 2019–20 due to the COVID-19 pandemic, thus postponing its data collection until 2020–21.

7. 42 U.S.C. § 12102(1)(A). The expansion applied to the second and third essential eligibility elements: (1) physical or mental impairment that (2) substantially limits (3) one or more major life activities. See, e.g., Perry A. Zirkel, *The ADA and Its Effect on Section 504 Students*, 22 J. SPECIAL EDUC. LEADERSHIP 3 (2009). In tandem with the ADA Amendments, Congress incorporated these standards in § 504. 29 U.S.C. § 705(20)(B) (2018).

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found successively higher national § 504-only rates of 1.02%, 1.48%, 1.81%, 2.29%, and 2.71%.⁸

In the first article in this current triad, we found a national rate of 3.26% for 2020–21 and rather wide variance at the state level, ranging from Texas’s 6.88% down to New Mexico’s 1.12%.⁹ In the follow-up analysis at the school district level, we found a wider variance among districts with enrollments of over 1,250 students, with 50 districts having rates above 12.37% and approximately 169 others reporting zero § 504-only students.¹⁰

The purpose of this third article is to extend the analysis of the § 504-only rate for 2020–21 to the individual school level. The source is the release of the CRDC public-use data file,¹¹ which includes this information and a host of other variables for each public school in the nation.¹² The procedure followed the basic steps of the school-level analysis for the 2017–18 CRDC:¹³ (1) deleting the schools with enrollments of 250 or fewer students;¹⁴ (2) cleaning the data to remove schools with unavailable enrollment or § 504-only entries;¹⁵ (3) calculating the percentage of § 504-only students based on the CRDC enrollment and § 504-only figures for each school; (4) ranking the schools in descending order of their § 504-only percentages; and (5) focusing the examination on the top and bottom segments of the percentage range.

Top Group

The top group was limited to the fifty sizeable¹⁶ schools with the highest rates of § 504-only students.¹⁷ In the initial array of the qualifying schools, we e-mailed the administrative representatives for the nineteen schools that appeared to have clearly questionable high percentages in relation to their 2017–18 results or the 2020–21 state or district results. Prompt e-mail replies from these schools resulted in corrections for sixteen of them.¹⁸ The corrections, which appeared to be attributable to submission errors, eliminated

8. Perry A. Zirkel & Gina L. Gullo, *State Rates of 504-Only Students in Public Schools: The Next Update*, 385 EDUC. L. REP. 14, 17–18 (2021).

9. Zirkel & Gullo, *supra* note 4, at 934–35.

10. Zirkel & Gullo, *supra* note 5, at 608.

11. CRDC, Recent Data Files, <https://civilrightsdata.ed.gov/data> (“downloadable data files” for 2020–21).

12. For the downloadable 2020–21 “school survey form” and “data file user’s manual,” *see id.* For quick highlights of the scope and participation level of the latest CRDC, including its 100% response rate, *see* U.S. Dep’t of Educ. OCR, Data Snapshot: An Overview of the U.S. Department of Education’s 2020–21 Civil Rights Data Collection (Nov. 2023), <https://civilrightsdata.ed.gov/publications>.

13. Perry A. Zirkel & Gina L. Gullo, *Public School Rates of § 504 Only Students: The Next Update*, 387 EDUC. L. REP. 1, 2 (2021).

14. The reasons for excluding the smaller schools were that (1) they included a large concentration of atypical school entities, such as early childhood centers and

truancy or youthful-offender programs, and (2) routine decreases or increases in the number of § 504-only students in these smaller schools would result in relatively marked changes in their percentage rates. *Id.* at 2 n.13.

15. The CRDC provides negative values in the public use data file to indicate “reserve codes” or “system errors” as identified in the CRDC Data File User’s Manual (<https://civilrightsdata.ed.gov/assets/downloads/2020-21%20User's%20Manual.pdf>). A total of 788 schools are not part of our analysis as a result of either unavailable enrollment entries (592 schools) or unavailable § 504 entries (196 schools).

16. “Sizeable” here refers simply to those with enrollments of over 250 students. *See supra* note 14 and accompanying text.

17. Per the limitation *supra* note 15, three of the top fifty schools in our analysis of the 2017–18 CRDC data (Zirkel & Gullo, *supra* note 13, at 7–9) had unavailable data in the current analysis: Sharon Middle School (MA), Northside High School (LA), and Montegut Middle School (LA).

18. E-mail from Kayla Woods, Principal, LaSalle El-

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them from the top group, causing their sequential replacement with the next fourteen schools in percentage order.

Table 1 identifies these fifty schools in rank order, along with their state, local education agency, enrollment (abbreviated as “Enr.”), and 504-only student percentage. The two other features of this table, which follow the model of the school-level 2017–18 results, are (1) shading in the state column to show whether the school rate notably corresponds to its state’s broad categorical ranking,¹⁹ and (2) adding designations in the school column via asterisks for special status schools.²⁰

A review of Table 1 reveals that the school ranked first appears to be an outlier because it is a charter school for students with dyslexia that has not only a distinctively high rate of § 504-only students (49.26%) but also an IEP for each of its remaining enrollees.²¹ With that exception, the top fifty schools range from a high of 36.17%, which is more than eleven times the national rate, down to 20.16%, which is more than six times the national rate.²² The aforementioned²³ shading in the state column suggests a notable relationship between the school and state § 504 rates; forty-nine of the top fifty schools were in states that were in the top (n=41) or middle (n=8) groups of states.²⁴ Finally, the entries in the school column show

elementary School (Illinois), to Perry A. Zirkel (Feb. 13, 2024, 14:12 EST) (correcting rate for LaSalle Elementary School from 20.34% to 3.05%); e-mail from Lorelei Krum, Admin. Ass’t to the Superintendent, Paola Unified Sch. Dist. (Kansas), to Perry A. Zirkel (Feb. 7, 2024, 16:48 EST) (correcting rate for Cottonwood Elementary Sch., Sunflower Elementary Sch., Paola Middle Sch., and Paola High. Sch., respectively, from 28.95% to 0%, 26.43% to .27%, 23.21% to 0%, and 21.64% to .68%); e-mail from Joey Johnson, Exec. Dir., Falls Lake Acad. (North Carolina), to Perry A. Zirkel, Feb. 6, 2024, 13:25 EST) (correcting rate for his school from 52.00% to 3.34%); e-mail from Sarah Saluta, Exec. Dir., San Diego Coop. Charter Sch. (California), to Perry A. Zirkel (Feb. 1, 2024, 12:25 EST) (correcting rate her school from 25.78% to 4.17%); e-mail from LaToya Blackshear, Dir. of Planning & Evaluation, Jackson Pub. Sch. Dist. (Mississippi), to Perry A. Zirkel (Feb. 1, 2024, 11:21 EST) (correcting rate for Casey Elementary Sch. and Bailey Middle APAC Sch., respectively, from 20.65% to .88% and 20.27% to 1.60%); e-mail from Deb Gustafson, Assoc. Superintendent, Geary Cnty. Schs. USD 475 (Kansas), to Perry A. Zirkel (Jan. 19, 2024, 14:05 EST) (correcting rates of Eisenhower Elementary Sch., Fort Riley Elementary Sch., Seitz Elementary Sch., and Junction City High Sch., respectively, from 29.51% to 0%, 21.11% to 1.6%, 22.69% to 2.1%, and 23.12% to 4.5%); e-mail from Kim McCune, Principal, Seal Elementary Sch. (Kansas), to Perry A. Zirkel (Jan. 18, 2024, 14:57 EST) (correcting rate for her school from 25.00% to 2.11%); e-mail from Adrienne Eastwood, Dist. Data Coordinator, Neodesha Schs. USD 461 (Kansas), to Perry A. Zirkel (Jan. 17, 2024, 11:56 EST) (correcting rate for Heller Elementary Sch. from 33.73% to 6.75%); e-mail from Tommie Saylor, Principal, Gobles Middle/High Sch. (Michigan), to Perry A. Zirkel (Jan. 17, 2024, 11:46 EST) (correcting rate for his school from 36.42% to 5.30%) (on file with author). Conversely, the representatives for three schools confirmed their reported CRDC § 504-only percentage. E-mail from David Collins,

Principal, Douglas County Youth Center (Nebraska), to Perry A. Zirkel, Feb. 6, 2024, 14:11 EST) (confirming the rate of 36.17% for the education program in this juvenile justice center); e-mail from Kevin Vanino, Data Adm’r, Muhlenberg Sch. Dist. (Pennsylvania), to Perry A. Zirkel (Jan. 18, 2024, 15:11 EST) (confirming 22.77% for Muhlenberg High Sch.); e-mail from Andromeda Cartwright, Chief Acad. Officer, La. Key Acad. (Louisiana), to Perry A. Zirkel (Jan. 17, 2024, 13:58 EST) (confirming the rate of 49.26% for her charter school) (on file with first author).

19. The background of the cell in the state column is differentiated to show whether the district is in the top third (designated by dark gray), middle third (designated by light gray), or bottom third (designated by white) of the states according to their 2020–21 rates of § 504-only students. Zirkel & Gullo, *supra* note 4, at 934–35. Rather than a precise measure of correlation, “notable” in this context only means evident based on these three broad categories for the states.

20. Specifically, a single asterisk designates magnet, specially themed, or other such distinctive school; a double asterisk designates a charter school; and a triple-asterisk designated a juvenile justice correction center.

21. Cartwright, *supra* note 18. The 2020–21 504-only rate of 49.26% is a marked increase from its reported 2017–18 rate of 27.81%. Zirkel & Gullo, *supra* note 13, at 7.

22. *Supra* text accompanying note 9 (national average of 3.26%).

23. *Supra* note 18 and accompanying text.

24. However, the state groups were thirds, thus repre-

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that at least nine of the fifty schools in the top group have a charter (n=8) or other distinctive status (n=1).²⁵

Bottom Group

Conversely, the bottom group was limited to the fifty schools with the highest enrollments among the approximately 8,492 schools with an enrollment of over 250 students and with zero § 504-only students according to the 2020–21 CRDC data.²⁶ Table 2, which has the parallel format features to those of Table 1,²⁷ lists this limited sample of 0% schools.

Within its limited representation of the many schools in this zero § 504-only category, Table 2 shows that those with the highest enrollments range from 2,012 to 9,249 students, which raises serious questions about either under-identification or reporting accuracy. The shading in the state column appears to indicate a lesser relationship between the school and state § 504-only rates for the bottom group than for the top group; only slightly more than one-fifth of the schools were in the bottom third of the states, with the remainder in either the middle third (n=13) or top third (n=26) of states.²⁸ Finally, the entries in the school column show that at least four of the fifty schools have a distinctive status, such as a juvenile justice center (n=2) or charter school (n=1).²⁹

Interpretation and Conclusions

The primary conclusion of this follow-up to the state- and district-level analyses is that the school level is the major locus of under- and over-identification of § 504-only students. Although the state and district cultures appear to be contributing factors to the school's § 504-only identification practices,³⁰ the relatively extreme percentage rates in the top group³¹ and the strikingly large number of 0% § 504-only schools³² indicate that—beyond just inputting errors at the local or CRDC levels—the awareness and interpretation of the applicable legal standards for eligibility of § 504 accommodations are in need of more

senting a much wider segment than the top fifty districts. Thus, these results should not be confused with a correlation coefficient, which would much more precisely reflect the individual positions within the entire state and district lists.

25. The reason for the “at least” qualifier is that these identifications are only approximate, based on direct inferences from the names of the schools and the corresponding identification of the local education agency. Closer scrutiny or familiarity with these schools might reveal others in the top fifty with such distinctive status.

26. This number may be higher depending on what the missing data are for the 788 schools not included in the analysis due to “negative values.” *Supra* note 15.

27. *Supra* notes 19–20 and accompanying text.

28. However, the intervening effect of the corresponding zero group at the district level accounts for a significant part of the seemingly limited relationship. The major example is Broward County Public Schools in Florida, which is in the top group of states, accounting for twenty-two of these fifty zero-group

schools. Other similar but less prominent examples from the district level in the top and middle group of states, respectively, are Belleville Township High School District 201, accounting for two of these fifty schools, and New York City Public Schools, which is in the near-zero group of districts and which accounts for eight more of these schools.

29. For the reason for the parallel use of the “at least” qualifier, *see supra* note 25.

30. For the state relationship, *see text supra* notes 23–24 and accompanying text. For the district relationship, *see supra* note 28.

31. The percentage range in the top group (*supra* text accompanying note 22) exceeded the uppermost end of not only the top state group (6.88%) but also the top district group (17.96%).

32. The total of 8,492 schools in this zero group for 2020–21 is less than the 10,951 in the zero-group in 2017–18 but still is so extensive as to suggest not only reporting errors for some but also under-identification for others.

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systemic attention in terms of district supervision as well as OCR enforcement. Many of the same schools were in each of these polar groups in the 2017–18 school-level analysis,³³ suggesting that these practices increasingly become part of the local school’s culture if not subject to such concerted attention.

The problems of under- and over-identification are manifold, including social justice and resource allocation, particularly in light of § 504 being a civil rights law and, thus, an unfunded mandate in comparison to the IDEA.³⁴ The disparities include not only wealth, but also gender, race, and national origin.³⁵ Similarly, high-stakes timed testing is a contributing factor³⁶ but only part of a more complex set of variables that interact to yield such disparate school rates.

A related but secondary conclusion is that charter schools merit special attention in light of their appearance at both polar positions of this wide variance.³⁷ Although charter schools are not consistently on the side of under- or over-identification,³⁸ the previous emphasis on access to double-covered students, i.e., those with IEPs,³⁹ needs to be extended to their identification of § 504-only students.

Finally, this analysis should be examined in tandem with those of the state- and district-levels for 2020–21 in comparison to those analyzing the previous CRDC data for § 504-only student rates. The results consistently and cumulatively point to the need for closer adherence to the legal standards rather than extra-legal factors. Although the legal

33. Zirkel & Gullo *supra* note 13, at 7–11. More than one quarter of the top group were repeaters in the top group, although the intervening effect of Broward County Public Schools made the repeaters less evident in the bottom group for 2020–21. *Supra* note 28.

34. *See, e.g.*, MARIA M. LEWIS & RAQUEL MUÑIZ, SECTION 504 PLANS: EXAMINING INEQUITABLE ACCESS AND MISUSE (June 2023), <https://nepc.colorado.edu/publication/504-plan-ra-time-to-take-the-sat-11558450347>; Perry A. Zirkel, *Avoiding Under- and Over-Identification of 504-Only Students: Pitfalls and Handholds*, 359 EDUC. L. REP. 715 (2018).

35. *See, e.g.*, Perry A. Zirkel & John M. Weathers, *Section 504-Only Students: National Incidence Data*, 26 J. DISABILITY POL’Y STUD. 184, 188–89 (2015); Perry A. Zirkel & John M. Weathers, *K–12 Students Eligible Solely under Section 504: Updated National Incidence Data*, 27 J. DISABILITY POL’Y STUD. 67, 70–71 (2016) (hereinafter referred to as “K–12 Students”). For more recent findings of racial and ethnic disparities in identification of § 504-only students, *see* Daniel J. Losen, Paul Martinez, & Grace Hae Rim Shin, *Disabling Inequity: The Urgent Need for Race-Conscious Resource Remedies* (2021), <https://www.civilrightsproject.ucla.edu/research/k-12-education/special-education/disabling-inequity-the-urgent-need-for-race-conscious-resource-remedies>. For § 504-only underrepresentation of Latino, African American, English Learner, and female students in the 2020–21 CRDC, *see* U.S. Dep’t of Educ. OCR, *Data Snapshot: Profile of Students with Disabilities in U.S. Public Schools during the 2020–21 School Year* (Feb.

2024), <https://civilrightsdata.ed.gov/publications>.

36. *See, e.g.*, Douglas Belkin, Jennifer Levitz, & Melissa Korn, *Many More Students, Especially the Affluent, Get Extra Time to Take the SAT*, WALL ST. J., May 21, 2019, <https://www.wsj.com/articles/many-more-students-especially-the-affluent-get-extra-time-to-take-the-sat-11558450347>; Tiffany Rowe Chavez, *Habitat and Access: How the Elite Get Their Colleges of Choice* 96 (Oct. 31, 2019) (Ed.D. dissertation, Concordia University Chicago), <https://search.proquest.com/openview/2fe76b59ca5836dcbfe088741650fbaf/1.pdf?pq-origsite=gscholar&cbl=18750&diss=y> (finding cultural, ethical, and practical problems in a case study of a high § 504-rate district).

37. *See supra* text accompanying notes 25 and 29. Again, the intervening effect of the district level, led by Broward County Public Schools, played a masking role for the bottom sample. *Supra* notes 28 and 33.

38. *E.g.*, Zirkel & Weathers, *K–12 Students*, *supra* note 35, at 71.

39. *See, e.g.*, Allison F. Gilmour, Colin Shanks, & Marcus A. Winters, *Choice, Mobility, and Classification: Disaggregating the Charter School Special Education Gap*, 44 REMEDIAL & SPECIAL EDUC. 272 (2023); Brenda K. Smith & Keith Christensen, *Systematic Review of Enrollment of Students with Disabilities in Charters Compared to Traditional Public Schools*, J. DISABILITY POL’Y STUD. (2023), doi 10.1177/1044207321146567 <https://doi.org/10.1177/10442073221146567>.

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standards, as is often the case,⁴⁰ are not mathematically precise, the criteria are sufficiently clear for reasonable determinations that do not come close to the relatively frequent schools at the polar positions of the current § 504-only percentage range. Even in the many schools in between these limited extremes that have what would appear at first glance to be a relatively acceptable overall proportion of § 504-only students, it may be that false positives and false negatives are far from negligible due to intervening factors, such as the emphasis on educational impact⁴¹ and the intersection of power and privilege.⁴²

The results also point to the need for improved CRDC procedures to detect data-submission errors and, via prompt notification to districts and a reasonable period for revision, their much more complete correction.⁴³ Without more comprehensive and concerted accountability at all levels, the un-warranted and ultimately detrimental inflated disparities in the identification of § 504-only students will continue unabated.

40. The corresponding legal criteria for IDEA eligibility and for the appropriateness of 504 plans are among the several related examples. *See* Perry A. Zirkel, *Through a Glass Darkly: Eligibility under the IDEA—The Blurry Boundary of the Special Education Need Prong*, 49 J.L. & EDUC. 149 (2020); Perry A. Zirkel, *How Good Must a 504 Plan Be to Pass Legal Muster?*, 36 J. SPECIAL EDUC. LEADERSHIP 43 (2023).

41. Although in-depth research is needed to determine the current path and extent of such potential contributing factors, the pervasive extension of the IDEA emphasis on educational impact has traditionally fo-

cused § 504-only status on the overly diagnosed impairment of ADHD, it may be that various low incidence physical and mental impairments, such as diabetes, severe Asperger' syndrome, school phobia, life threatening allergies, Crohn's disease, and anorexia are under-identified for this status.

42. *See generally* LEWIS & MUNIZ, *supra* note 34.

43. For the already extensive accuracy measures, *see* U.S. Dep't of Educ. OCR, Data Snapshot, Civil Rights Data Quality from Start to Finish (Nov. 2023), <https://civilrightsdata.ed.gov/publications>.

PUBLIC SCHOOL RATES OF § 504-ONLY STUDENTS

Table 1. Top 50 Schools (with Enrollments Over 250) for Percentage of “§ 504-Only” Students

RANK	STATE	LOCAL EDUCATION AGENCY	SCHOOL	ENR.	RATE
1	Louisiana	Louisiana Key Academy*	Louisiana Key Academy**	404	49.26%
2	Nebraska	Douglas County Youth Center**	Douglas County Youth Center***	282	36.17%
3	New Hampshire	Shaker Regional School District	Belmont Elementary School	343	35.86%
4	New York	Neighborhood Charter School of Harlem*	Neighborhood Charter School of Harlem**	672	33.48%
5	Louisiana	Sophie B. Wright Inst. of Academic Excellence*	Sophie B. Wright Inst. of Academic Excellence**	488	32.58%
6	Louisiana	Claiborne Parish School District	Haynesville Junior/Senior High School	296	26.69%
7	Colorado	Boulder Valley School District RE-2	New Vista High School	308	26.62%
8	Idaho	Blaine County District	Wood River High School	939	25.88%
9	Florida	Alachua County Public Schools	Prof'l. Academics Magnet @ Lofton High School*	276	25.72%
10	Louisiana	Lafayette Parish School System	Carencro Middle School	666	25.08%
11	New York	Boys Preparatory Charter School of New York*	Boys Preparatory Charter School of New York**	783	25.03%
12	Texas	Boyd Independent School District	Boyd Intermediate/Middle School	267	24.72%
13	Louisiana	Lafayette Parish School System	Lafayette Middle School	395	24.56%
14	Texas	Pottsboro Independent School District	Pottsboro Middle School	425	24.47%
15	New York	Rondout Valley Central School District	Rondout Valley Junior High School	281	24.20%
16	Louisiana	Lafourche Parish School District	Virtual Academy of Lafourche**	494	24.09%
17	Illinois	Champaign Community Unit School District 4	Edison Middle School	762	23.49%
18	Louisiana	Lafayette Parish School System	Acadian Middle School	371	23.45%
19	Texas	Queen City Independent School District	Morris Upchurch Middle School	261	23.37%
20	Texas	Cotulla Independent School District	Frank Newman Middle School	291	23.02%

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RANK	STATE	LOCAL EDUCATION AGENCY	SCHOOL	ENR.	RATE
21	Texas	China Spring Independent School District	China Spring Intermediate School	656	22.87%
22	Pennsylvania	Muhlenberg School District	Muhlenberg High School	1,041	22.77%
23	Texas	Gatesville Independent School District	Gatesville Intermediate School	632	22.47%
24	Texas	Redwater Independent School District	Redwater Middle School	251	22.31%
25	Texas	Corpus Christi Independent School District	Hamlin Middle School	546	22.16%
26	Texas	Austin Independent School District	McCallum High School	1,854	21.90%
27	Texas	Killeen Independent School District	Pathways Academic Campus*	399	21.80%
28	Connecticut	Wolcott School District	Alcott Elementary School	312	21.79%
29	Arkansas	Flippin School District	Flippin Middle School	263	21.67%
30	New York	Briarcliff Manor Union Free School District	Briarcliff High School	545	21.65%
31	Texas	Sweetwater Independent School District	Sweetwater Middle School	478	21.55%
32	Texas	Round Rock Independent School District	Success High School*	336	21.43%
33	Texas	Rapport Academy Public School*	Quinn Middle School**	263	21.29%
34	Louisiana	Lafayette Parish School System	Broussard Middle School	582	21.13%
35	Illinois	North Palos School District 117	Dorn Elementary School	429	20.98%
36	Louisiana	Madison Parish School District	Madison High School	315	20.95%
37	Texas	Hughes Springs Independent School District	Hughes Springs Junior High School	268	20.90%
38	Arkansas	Harrisburg School District	Harrisburg Middle School	324	20.68%
39	Texas	Shallowater Independent School District	Shallowater Middle School	528	20.64%
40	Louisiana	Fannie C. Williams Charter School*	Fannie C. Williams Charter School**	481	20.58%
41	New York	Rondout Valley Central School District	Rondout Valley High School	613	20.55%
42	New York	New York City Montessori Charter School*	New York City Montessori Charter School*	304	20.39%
43	Texas	Buna Independent School District	Buna Junior High School	354	20.34%
44 (tie)	Texas	Hays Consolidated Independent School District		743	20.32%
44 (tie)	Louisiana	St. Martin Parish Public Schools	R.C. Barton Middle School Parks Middle School	310	20.32%

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RANK	STATE	LOCAL EDUCATION AGENCY	SCHOOL	ENR.	RATE
46	Louisiana	Terrebonne Parish School District	Lacache Middle School	390	20.26%
47	Texas	Iowa Park Consolidated Independent School District	W.F. George Middle School	476	20.17%
48	Texas	Newton Independent School District	Newton High School	258	20.16%
49 (tie)	Louisiana	Lafayette Parish School System	Scott Middle School	532	20.11%
49 (tie)	Texas	Highland Park Independent School District	Highland Park High School	2208	20.11%

* Charter school

** Juvenile justice correction center

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Table 2. Top 50 of the Approximately 8,492 Schools with Enrollments Over 250 That Reported Zero
“§ 504-Only” Students

RANK	STATE	LOCAL EDUCATION AGENCY	SCHOOL	ENR.
1	Alaska	Galena City School District	Interior Distance Education of Alaska (IDEA)***	9,249
2	Florida	Broward County Public Schools	Cypress Bay High School	4,659
3	Virginia	Alexandria City Public Schools	Alexandria City High School	4,180
4	New York	New York City Public Schools	Forest Hills High School	3,768
5	Pennsylvania	Hazleton Area School District	Hazleton Area High School	3,581
6	Florida	Broward County Public Schools	Western High School	3,564
7	Florida	Broward County Public Schools	Marjory Stoneman Douglas High School	3,332
8	New York	New York City Public Schools	Susan E. Wagner High School	3,286
9	New York	New York City Public Schools	Hillcrest High School	2,855
10	Florida	Broward County Public Schools	J. P. Taravella High School	2,800
11	Pennsylvania	SCI-Frackville**	SCI Frackville**	2,696
12	Florida	Broward County Public Schools	Coral Glades High School	2,684
13	Florida	Broward County Public Schools	West Broward High School	2,595
14	Florida	Broward County Public Schools	Coral Springs High School	2,535
15	Florida	Broward County Public Schools	Charles W. Flanagan High School	2,516
16	California	Modesto City High School District	Modesto High School	2,493
17	New Jersey	Passaic City School District	Passaic High School No. 12	2,490
18	Arizona	Peoria Unified School District	Liberty High School	2,475
19	Florida	Broward County Public Schools	Dillard High 6-12	2,448
20	Illinois	Belleville Township High School District 201	Belleville High School-East	2,430
21	New York	New York City Public Schools	John Adams High School	2,423
22	California	Montebello Unified School District	Bell Gardens High School	2,411
23	Florida	Broward County Public Schools	Monarch High School	2,406

PUBLIC SCHOOL RATES OF § 504-ONLY STUDENTS

RANK	STATE	LOCAL EDUCATION AGENCY	SCHOOL	ENR.
24	Florida	Broward County Public Schools	Deerfield Beach High School	2,368
25	New York	New York City Public Schools	Thomas A. Edison Career & Tech. Educ. High School***	2,333
26	Florida	Broward County Public Schools	Cooper City High School	2,327
27	Florida	Broward County Public Schools	South Broward High School	2,318
28	Florida	Broward County Public Schools	South Plantation High School	2,310
29	Florida	Broward County Public Schools	Fort Lauderdale High School	2,309
30	Florida	Broward County Public Schools	Nova High School	2,277
31	California	Modesto City High School District	James C. Enochs High School	2,272
32	New York	Uniondale Union Free School District	Uniondale High School	2,265
33	California	Modesto City High School District	Joseph A. Gregori High School	2,259
34	New York	New York City Public Schools	John Dewey High School	2,255
35	Florida	Broward County Public Schools	Falcon Cove Middle School	2,229
36	Florida	Broward County Public Schools	Piper High School	2,215
37	Virginia	Manassas City Public Schools	Osbourm High School	2,193
38	Illinois	Belleville Township High School District 201	Belleville High School-West	2,179
39	Florida	Broward County Public Schools	Everglades High School	2,135
40	New York	New York City Public Schools	Intermediate School 61 Leonardo Da Vinci	2,134
41	Florida	Broward County Public Schools	Miramar High School	2,122
42	Florida	Broward County Public Schools	City/Pembroke Pines Charter High School*	2,111
43	California	Modesto City High School District	Thomas Downey High School	2,071
44	Florida	Broward County Public Schools	McArthur High School	2,067
45	Indiana	Fort Wayne Community Schools	Northrop High School	2,046
46	Arizona	Peoria Unified School District	Centennial High School	2,034

EDUCATION LAW REPORTER

RANK	STATE	LOCAL EDUCATION AGENCY	SCHOOL	ENR.
47	Illinois	Mundelein Consolidated High School District 120	Mundelein Consolidated High School	2,032
48	Florida	Broward County Public Schools	Blanche Ely High School	2,027
49	California	Five Keys Indep. HS (San Francisco Sheriff's District)	Five Keys Independence High School**	2,016
50	Arizona	Peoria Unified School District	Ironwood High School	2,012

* Charter school

** Juvenile justice correction center

*** Other distinctive school