

“Whose Job is This?” Using the STEPS Model to Explore 504 Role Ambiguity

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Abstract

The American School Counselor Association’s position statement regarding school counselors’ roles in Section 504 encourages school counselors to avoid serving as Section 504 coordinators. Still, school counselors are frequently asked to serve in this role, despite ASCA’s position or their minimal training specific to Section 504. Yet, school counselors are also uniquely equipped to support student development, improved outcomes, and collaboration amongst school and family stakeholders. Through a synthesis of prior research along with current ethical codes and policies within the school counseling profession, this manuscript examines the ethical and practical tensions created by 504-role ambiguity. It offers examples and specific steps demonstrating how school counselors can navigate the dual assignment of Section 504 coordinator and school counselor using an ethical decision-making model. The authors provide recommendations for future practice and policy.

Keywords: Section 504; counselor responsibilities; counselor education; 504 coordinator; ethical decision making

Introduction

School counselors are often tasked with responsibilities as Section 504 coordinators (American School Counselor Association [ASCA], 2023). We examine the ethical and professional dilemmas counselors face when these roles overlap, emphasizing the conflict between their training and the legal requirements of Section 504. This article explores the evolving role of school counselors in managing comprehensive school counseling programs. While the American School Counselor Association (ASCA, 2024) advises against school counselors serving as 504 coordinators, if counselors are asked to take on this responsibility, they can ethically assess how best to fulfill the role and prepare to execute it effectively in support of students. We highlight the guidance provided by professional organizations, such as ASCA, and propose strategies, including ethical decision-making models (Cottone & Claus, 2000), and proposed policy, to navigate these complexities. By analyzing these challenges, the paper advocates for enhanced professional training, clear role delineations, and policy development and implementation to improve systems enabling school counselors to effectively fulfill their duties while supporting students with disabilities. For the complexities of contemporary classrooms (Stewart & Jansky, 2022), while veteran teachers must adapt to new standards, accountability systems, and technologies. Within this context, professional learning is expected to serve both as a mechanism for teacher support and as a lever for systemic improvement. Yet, the evidence base remains mixed: while case studies and qualitative reports highlight examples of transformative teacher growth, large-scale quantitative studies often reveal weak or inconsistent relationships between PD and student achievement (Hill et al., 2013; Yoon

et al., 2007; Kennedy, 2016; Ventista, 2023; Sims et al., 2025; Lynch et al., 2025).

School counselors are charged with implementing comprehensive school counseling programs for each and every student (ASCA, 2025, 2019). Several researchers have defined and advocated for comprehensive school counseling programs (Ault & Gibbons, 2024; Gysbers et al., 1999; Gysbers & Henderson, 2000; Gysbers & Lapan, 2001). While terms have shifted through the years, many key elements of comprehensive programs remain (Akos et al., 2022; ASCA, 2025). Such programs improve student outcomes through preventative interventions and developmental considerations (ASCA, 2025). Researchers consistently demonstrate the efficacy of comprehensive program implementation as linked to positive student outcomes (Borders & Drury, 1992; Wilkerson et al., 2013; Ziomek-Daigle et al., 2016) and improved job satisfaction (Pyne, 2011). School counselors can look to *The ASCA National Model®: A Framework for School Counseling Programs* (ASCA; 2025) as a framework for implementing a comprehensive school counseling program. The ASCA National Model® (2025) incorporates the *ASCA Ethical Standards* (2022a), *ASCA School Counselor Professional Standards and Competencies* (2019), and the *ASCA Mindsets and Behaviors for Student Success* (2021). By doing so, the model aligns with best practices by incorporating preventative and developmental applications while prioritizing improved student outcomes. The ASCA National Model® (2025) is further built upon four fundamental tenets. These tenets describe a school counselor's role: (a) define, (b) manage, (c) deliver, and (d) assess.

Given the emphasis on supporting each and every student, comprehensive school counseling programs are designed to meet the needs of students with disabilities (Deck et al., 1999; Mitcham et al., 2009; Owens et al., 2011), including students receiving 504 services (Goodman-Scott & Boulden, 2019; Romano et al., 2009; Townsend & Yount, 2019). The role school counselors assume as it relates to Section 504 varies widely from state-to-state, district-to-district, and even building-to-building (Townsend & Yount, 2019). While school counselors are prepared to assume Section 504 related responsibilities, they often find themselves assigned to serve as Section 504 coordinators (ASCA, 2023), extending their professional duties beyond their typical training (Goodman-Scott & Boulden, 2019). However, researchers continue to document the prevalence of school counselors serving in this capacity (e.g., Goodman-Scott & Boulden, 2019; Kolodinsky et al., 2009; Madaus & Shaw, 2008; Romano et al., 2009), including researchers with ASCA. A recent research report surveying building-level and district-level school administrators (ASCA, 2023) found 63% of all administrators reported they understood a school counselor's role "to a great extent" (ASCA, 2023, p. 6), and nearly 75% indicated familiarity with the ASCA National Model. Results also indicated 55.9% of building-level administrators and 52.1% of district-level administrators identified coordinating 504 plans as part of a school counselor's role and responsibility. While professional organizations within school counseling often describe coordinating 504 plans as an inappropriate school counseling duty (ASCA, 2022b), the results of this report demonstrate school and district administrators are often placing school counselors in the role of 504 coordinators, believing it to be an appropriate duty.

School counselors are uniquely equipped to serve as facilitators and coordinators in their school settings (Esparza & Milsom, 2023). The *ASCA Ethical Standards for School Counselors* (2022a) describe the vital role school counselors play in collaborating with relevant stakeholders (A.3.b, A.4.a, A.6.a, A.6.f, A.10.d, B.1.a, B.2.q), remaining knowledgeable of educational policies (A.1.i, A.6.c, B.2.q, B.3.d), and facilitating productive teams to support students' growth and development (A.1.k). Similarly, CACREP (2024) describes school counselor preparation as orienting future counselors to their roles as advocates and change agents. Despite school counselors' training and expertise, researchers continue to describe a tension between school counselors' roles in supporting students with disabilities and facilitating plans for students with 504 accommodations (Goodman-Scott & Boulden, 2019; Greiner & Hatton, 2023). Acknowledging the leadership role of school counselors marks a significant shift in mindset within education; school counselors require space to reflect on their role within their unique context to develop guiding visions aligned with their practice (Watkinson, 2015).

Section 504 and the 504 Coordinator's Role

Under Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 28 CFR 35.104), schools and other local education agencies receiving federal financial assistance ensure students with disabilities receive a free appropriate public education (FAPE). As a civil rights law, Section 504, Title 34, Subpart D protects disabled students from discrimination (29 U.S.C. 28 CFR 35.104). It requires schools and local education agencies (LEAs) receiving federal funding to provide

appropriate regular education and as needed, special education, including supplementary aids and services, to meet the individual educational needs of students with disabilities at the same level as students without disabilities (Office of Civil Rights, 2022). Section 504 requires schools and LEAs to utilize relevant and valid evaluation to identify and locate students with disabilities and to work with families in the development of individual programming that is appropriate, free of charge, and ensures the student is receiving support and services in, or as close to the general education environment as is appropriate (Martín, 2018). Schools and LEAs receiving federal funds who fail to adhere to Section 504 rules and regulations are in jeopardy of an investigation by the Office of Civil Rights (OCR). Findings of noncompliance may have financial, structural, systematic, and/or legal implications.

Section 504 Title 34, 104.7 requires appointing a Section 504 coordinator to oversee, guide, and support the law's implementation (29 U.S.C. 28 CFR 35.104). The *ASCA Ethical Standards for School Counselors* (2022) asserts school counselors “recognize the strengths of students with disabilities as well as their challenges and provide best practices and current research in supporting their academic, career and social/emotional needs” (p. 5). Given this ethical standard, school counselors are often assigned the role of 504 coordinators (Madaus & Shaw, 2006; Shaw & Madaus, 2008). However, this responsibility may be at odds with a school counselor’s scope of practice, as their preparation programs may not have offered training and experience in Section 504 or disability law (ASCA, 2016). This leaves school counselors with the novel challenge of coordinating and implementing the required components of Section 504, including evaluations, meetings, and plans, without needed preparation or knowledge.

ASCA advises school counselors to support students with disabilities in their academic and social/emotional well-being yet adds complication and confusion by advising against school counselors coordinating Section 504 efforts (ASCA, 2024; ASCA, 2022a). Consequently, while common practice, assuming the role of Section 504 coordinator often generates ethical dilemmas for school counselors, particularly involving competence issues and scope of practice. To mitigate potential ambiguity around Section 504, school counselors are called to employ an ethical decision-making model (ASCA, 2014; ASCA, 2016; Brown & Armstrong, 2022). These models address confusion derived from seemingly contradictory guidelines and expectations while supporting school counselors’ decision-making process in considering professional best practices.

Alignment Between Comprehensive School Counseling Programs and 504

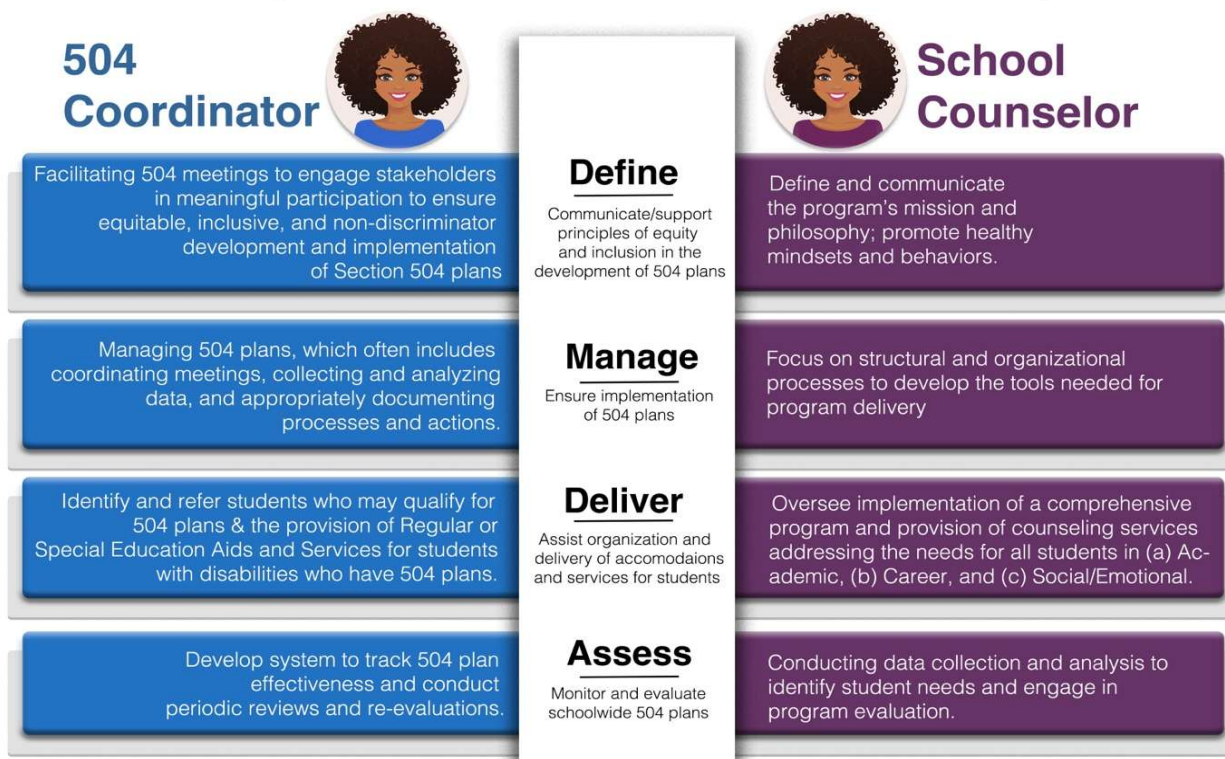
While the components of the ASCA National Model[®] (2025) (i.e., define, manage, deliver, and assess) and the role of 504 coordinators have differing areas of focus, the alignment between the two is evident in priorities to determine and deliver appropriate services, collect data, evaluate outcomes, and promote inclusive, ethical practice. The common goal of supporting students for success demonstrates the interrelatedness of the work of 504 coordinators and school counselors implementing comprehensive school counseling programs. Figure 1 illustrates the alignment between the roles of school counselors and Section 504 coordinators.

Viewed through the perspective of the ASCA National Model[®] (2025), similarities in the roles of the school counselor and the expectations of a 504 coordinator are evident.

Figure 1:

Alignment Between Professional Roles and Responsibilities for Section 504 Coordinators

Section 504: Alignment between Professional Roles and Responsibilities



A comparison chart showing the alignment of roles and responsibilities between 504

Coordinators and School Counselors in implementing Section 504 plans.

Define

The *define* component of the ASCA National Model® (2025), or foundation, involves school counselors defining and communicating the program's mission and philosophy in promoting specifically identified healthy mindsets and behaviors. In like fashion, 504 coordinators also work to communicate and support principles of equity, inclusion, and non-discrimination in the development and implementation of 504 plans (Washington OSPI, 2014).

Manage

Concerning management, school counselors focus on structural and organizational processes to develop the tools needed for program delivery. Likewise, 504 coordinators are tasked with managing 504 plans, which often include coordinating meetings, developing and overseeing appropriate processes, and documenting team decisions and actions (Washington OSPI, 2014).

Deliver

For the delivery system, school counselors address the overall implementation of the comprehensive school counseling program, including its organization and evaluation. Similarly, 504 coordinators are also called upon to assist in organizing and delivering services and accommodations for students (Washington OSPI, 2014).

Assess

The ASCA National Model® (2025) component, *assess*, involves accountability, which includes school counselors collecting data, analyzing student needs, and engaging in program evaluation. Similarly, 504 coordinators collect data to monitor student progress and evaluate 504 plan effectiveness (Washington OSPI, 2014).

Section 504 Coordination: Addressing the Ethical Dilemma

School counselors are often required to serve as Section 504 coordinators (ASCA, 2023), even as ASCA defines the role as inappropriate (ASCA, n.d.). Moreover, school leaders often perceive this coordination as positioned within a school counselor's explicit role (ASCA, 2023). Despite the overlap in role expectations between school counselors and Section 504 coordinators, school counselors may lack contextual knowledge of Section 504 regulations. Consequently, serving as Section 504 coordinator may move school counselors beyond their professional training to lead in identifying, evaluating, and programming students with disabilities and ensure compliance with the law. Upon reviewing the *ASCA Ethical Standards for School Counselors* (2022), many may find themselves grappling with the question of whether they should or should not be responsible for Section 504 coordination.

The use of ethical decision-making models can help to address such ethical ambiguity. Consequently, to support school counselors contending with the appropriateness of their role within the Section 504 process, below we outline an ethical decision-making process school counselors may employ to evaluate their unique circumstances as they relate to Section 504.

Ethical Decision-Making Using the STEPS Model

With the complexities of increasingly diverse student populations, school counselors regularly face ethical dilemmas; ethical decision-making models can guide their work resolving dilemmas when they arise (Brown & Armstrong, 2022; Luke et al., 2016). One specific model is the *Solutions to Ethical Problems in Schools* (STEPS; Stone, 2017). STEPS is a nine-step process integrating developmental issues and parental rights (Brown & Armstrong, 2022). ASCA also incorporates the STEPS model (Stone, 2017) into the *ASCA Ethical Standards for School Counselors* (ASCA, 2022). As such, ASCA recommends utilizing STEPS as a model for school counselors to consult when remedying ambiguous and complex ethical dilemmas. Professionals may turn to the STEPS model to clarify conflicting professional guidelines and contradictory practices specific to Section 504. As illustrated in Figure 2 and subsequently detailed, we explore how school counselors can rise to meet the needs of students with disabilities by thoughtfully navigating Section 504 responsibilities using the STEPS model.

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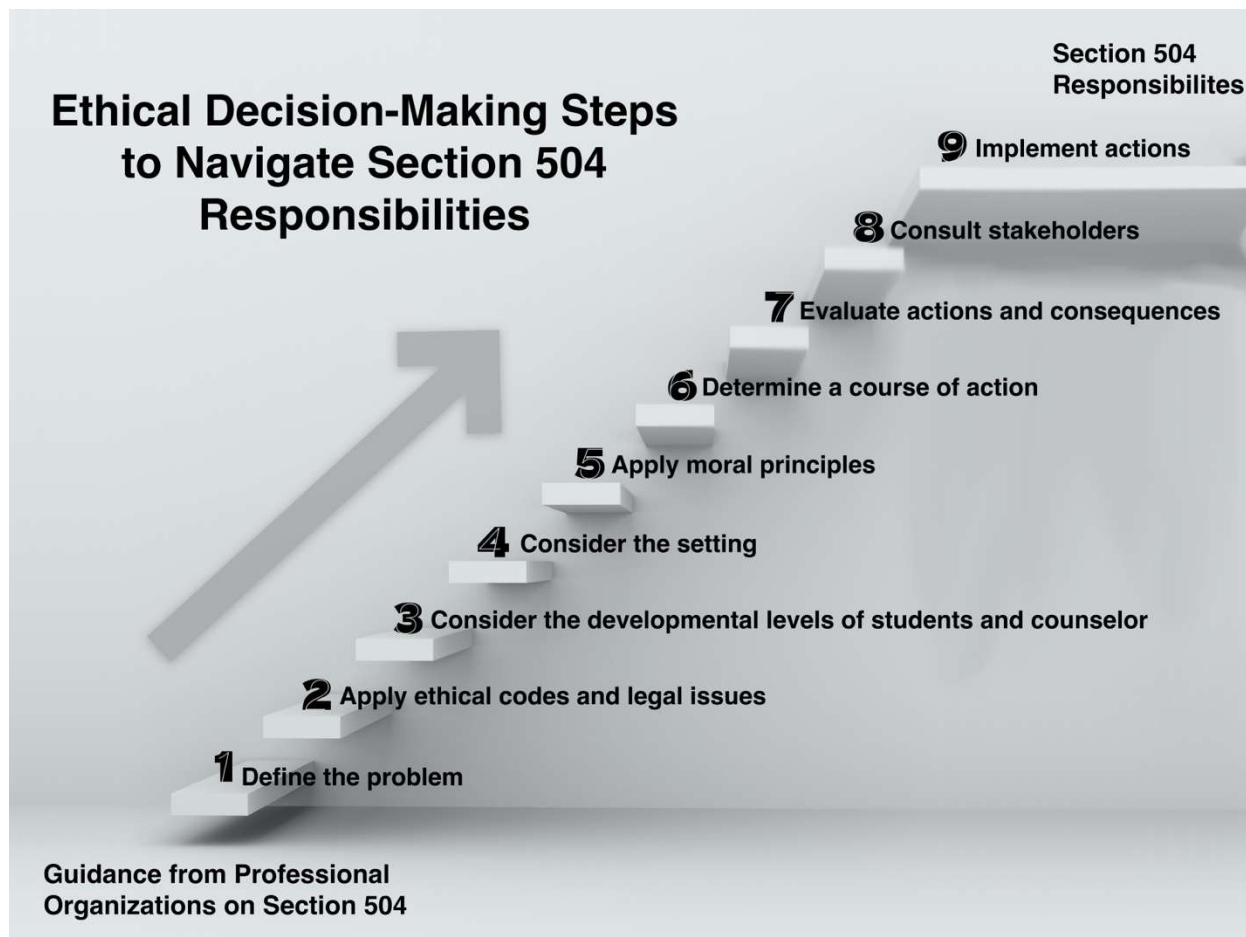
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Ethical Decision Making Steps to Navigate Section 504 Responsibilities



A staircase graphic illustrating nine ethical decision-making steps for navigating Section 504 responsibilities, from defining the problem to implementing action.

STEP 1: Defining the Problem

Emotionally and Intellectually. The first step in the model is defining the problem within the context of one's own emotional and intellectual perspective. When tasked with serving as a 504 coordinator, school counselors may feel apprehension, fear, and frustration (Goodman-Scott & Boulden, 2019; Romano et al.,

2009). These feelings may be related to internal conflict between the requirements being placed upon them by the administration, the position statements published by ASCA concerning the roles of school counselors, and their interpretation of relevant ethical codes and legal statutes.

STEP 2: Applying Ethical Codes and Legal Issues.

Seeking guidance from leading organizations may help define the problem and assist school counselors as they apply relevant ethical codes and legal issues. School counselors are called upon to serve and address the needs of each and every student (ASCA, 2022a). The role of school counselors in serving each and every student is inclusive, working to identify and meet the needs of every student regardless of ability. According to the ASCA (2022a) position statement concerning the school counselor and students with disabilities:

School counselors provide direct and indirect services to students with disabilities through the implementation of a school counseling program (Goodman-Scott & Boulden, 2019). School counselors recognize the strengths of students with disabilities as well as their challenges and provide best practices and current research in supporting their academic, career, and social/emotional needs (ASCA, 2022 [a]).... school counselors advocate for students with special needs and disabilities, encourage family involvement in their child's education and collaborate with other educational professionals to promote academic achievement, college/career readiness, and social/emotional wellness for all. (para. 5 & 10).

Similarly, the Council for the Accreditation of Counselling and Related Educational Programs (CACREP, 2024) emphasizes equipping future counselors with the knowledge and skills to effectively provide services to all populations, including those with disabilities (Standard 3.A.4).

The *ASCA Ethical Standards for School Counselors* (2022b) also provides guidance for collaborating with multiple stakeholders to address student needs. Being that school counselors hold many roles, in accordance with the *ASCA Ethical Standards for School Counselors* (2022b), school counselors work to ensure that school personnel are aware of the distinctions between which elements school counselors are prepared to perform and those that fall outside their legal responsibility and scope of practice. For instance, while school counselors are prepared to identify students who may qualify for a 504 plan, they may not have received pre-service preparation to write or supervise a 504 plan for students with disabilities. Further, school counselors are equipped to collaborate with families and other stakeholders to support the determination of services rendered. Providing training that includes Section 504-specific decision making information and skills better prepares counselors to coordinate 504 efforts.

When reflecting on ethical codes and legal issues, it is imperative to consider and evaluate the foundational intent guiding Section 504 and its implementation regulations (29 U.S.C. 28 CFR 35.104). As a civil rights law, Section 504 protects individuals with disabilities. Consequently, failing to abide by Section 504 regulations situates a district not only in noncompliance with the law but ultimately creates a space for discrimination based on disability and a denial of the civil rights of students with disability. As the regulating body of Section 504, OCR monitors the implementation of this law and investigates districts' implementation (or lack thereof) of the regulations when warranted. Investigation results are published for transparency and may guide other districts nationwide. In two unique cases in 2012, Memphis City School District (Pierre, 2012a) and Clarksville

Montgomery County School District (Pierre, 2012b) were each found out of compliance with Section 504 regulations. In both investigations, leadership appointed school counselors to serve as Section 504 coordinators for their assigned schools. In its findings related to Memphis City School District, OCR, Region IV (Pierre, 2012a) stated:

At the school level, the guidance counselor is responsible for coordinating Section 504 activities. In this regard, the guidance counselor is solely responsible for ensuring that students who may qualify as students with disabilities under Section 504 receive interventions, evaluations, and where appropriate, Section 504-related aids and services, (p. 5).

As demonstrated in the above quote, school counselors in this role bore the responsibility to ensure students suspected of having a disability under Section 504 were evaluated and, when appropriate, provided interventions, accommodations, and/or specialized instruction as necessary to the provision of FAPE. Given minimal training, school counselors reported feeling ill-prepared to meet these obligations. OCR ultimately determined both districts in question failed to evaluate a large number of students suspected of having a disability and consequently failed to provide support and services as required under Section 504 (Pierre, 2012a; Pierre 2012b).

Contributing to the potential lack of preparation to take on the 504 coordination role and responsibilities are the ASCA Position statements regarding school counselors' role specific to 504 plans and working with students with disabilities. In the *Appropriate and Inappropriate Activities for School Counselors* chart (ASCA, 2025), ASCA lists "504 coordination" as "inappropriate". This guidance may hinder school counselors' preparation as they may

avoid training specifically identified as relevant for the 504 coordination role (p. 10).

STEP 3: Consider the chronological and developmental levels. The third step in this ethical decision making model involves examining factors such as chronological age, developmental levels, and experiences of the individuals involved. For school counselors, some of these chronological and developmental factors to consider include years of professional service, past professional experiences, and level of training and preparation related to school counseling and Section 504. Seasoned school counselors who have worked regularly with 504 teams in supporting students with disabilities may feel more comfortable and better prepared to assume the role of 504 coordinator than early-career school counselors with minimal experience supporting students by serving on 504 teams. Conversely, new school counselors who have received targeted pre-service preparation and training concerning Section 504 may be better equipped to serve as 504 coordinator than school counselors with more years of professional service but little-to-no training specific to Section 504.

Similarly, school counselors determining their readiness to serve as 504 coordinators should also consider the chronological and developmental levels of the students whom they will serve in this role. The needs of students who qualify for a 504 plan are often diverse, varying greatly from one student to the next. Because of this, adopting a developmental perspective that considers both the chronological ages and developmental levels of students is vital, as the appropriate approach may differ based on educational level (i.e., elementary, secondary). School counselors considering the role of Section 504 coordinator may evaluate their understanding and knowledge

of child development and the unique individual needs of students with various disabilities within the educational setting they serve. As the school counselor's role includes serving the needs of each and every student within their school, including students with disabilities (ASCA, 2023), school counselors should strive to determine whether the interventions and supports provided are developmentally appropriate and aligned to the unique needs of students with disabilities. When serving as 504 coordinator, school counselors must be prepared to appropriately identify and ensure proper implementation of developmentally responsive services and interventions. Selecting appropriate services for students with disabilities necessitates tailoring accommodations, interventions, and related supports to the individual and their specific circumstances (Office of Civil Rights, 2023).

STEP 4: Consider the setting, parental rights, and minor's rights. School counselors need to be aware of students' rights and the rights of their parents regarding the development and implementation of 504 plans. Following the provisions outlined in Section 504 (29 U.S.C. 28 CFR 35.104, 1973), students and their parents have specific legal rights to protect their interests. These protections ensure students with disabilities are medically safe while at school, have the same educational access as students without disabilities, and are treated equitably. School counselors are responsible for understanding and supporting the rights guaranteed to students and families under Section 504. School counselors considering the role of Section 504 coordinator need to understand the intersection between relevant district policies, state laws/statutes/regulations, and federal laws/statutes/regulations concerning the

rights of parents and students, particularly those pertaining to students with disabilities. Additionally, school counselors advocate for appropriate and reasonable accommodations in the 504 plan. This role requires understanding appropriate accommodations and what is possible within the school setting. Consequently, school counselors serving as Section 504 coordinators need to be knowledgeable regarding Section 504 requirements as well as overall school structure, resources, and facilities that may be utilized for 504 implementation.

STEP 5: Applying the moral principle. When determining what steps to take and what role they need to play regarding 504 plans, school counselors also need to account for the basic moral principles of autonomy, beneficence, nonmaleficence, fidelity, veracity, and justice (ASCA, 2022b; Corey et al., 2024; Kitchener, 1984; Meara, et al., 1996; Stone, 2017). Considering and prioritizing these basic moral principles can help school counselors explore options for addressing ethical dilemmas when called upon to serve as 504 coordinators within their schools. For example, a school counselor who is placed in a 504 coordinator role needs to examine the manner in which coordinator duties may potentially impact or enhance their abilities to fulfill their other responsibilities as a school counselor. Some school counselors may view 504 coordination as conflicting with one or more of the basic moral principles, as the responsibilities inherent to this role could create barriers in their efforts to implement a comprehensive school counseling program. Alternatively, serving as a 504 coordinator may allow some school counselors to more effectively support autonomy and justice for students with disabilities. Additionally, through the development of systematic 504 procedures incorporated with fidelity in a broader comprehensive school counseling

program, school counselors may more effectively address the needs of each and every student promoting beneficence and nonmaleficence schoolwide.

STEP 6: Determining a potential course of action and its consequences.

After going through steps one through five, a school counselor should consider the potential and possible pathways for moving forward. As part of this consideration, it can be helpful for the school counselor to explore each option by writing it down. To examine potential courses of action, school counselors will also want to evaluate each option identifying potential positive and negative consequences. For example, a school counselor directed by their district to serve as the 504 coordinator, may consider refusing to serve in that capacity citing ASCA’s position calling for school counselors to actively advocate against coordinating 504 services. Potential consequences for such an option could include, allowing space for the school counselor to better implement a comprehensive school counseling program; however, another potential consequence for such an action could include not being viewed by colleagues as being a “team player”, facing disciplinary action such as being “written up” (aka “job target”), or even being dismissed from their position with the district for insubordination. Alternatively, school counselors in this position may consider serving in this capacity, however, make a commitment to evaluating their time using the School Counselor 504 Activities Scale (Boulden & Goodman-Scott, 2024) with the intention to drive further

conversation with their supervisor in the future. In this option, the school counselor may experience challenges as they navigate implementing a comprehensive school counseling program, while simultaneously maintaining and continuing to build positive relationships with their colleagues and administrators, setting the stage for advocacy of new role assignments in the future. A third potential course of action could include the school counselor accepting the role of 504 coordinator recognizing the ways in which coordination responsibilities may align and integrate with their implementation of a comprehensive school counseling program. Potential consequences of this third option could include centralized leadership in the integration of 504 procedures and comprehensive school counseling program components allowing for improved fidelity and clarity schoolwide, ensuring appropriate interventions to address the needs of each and every student (including those with disabilities).

STEP 7: Evaluating the selected action.

School counselors must evaluate each potential course of action using the information gathered and identified in step six. Through this evaluation, assessing potential consequences for all individuals and entities involved is important, including the counselor themselves. This evaluative process contextualizes the consequences of each potential action, comparing one to another. School counselors thoughtfully examine how the potential course(s) of action may affect various parties involved in both

the short-term and long-term. By assessing the various factors and components related to the potential actions, school counselors can effectively appraise each action and ultimately select one for implementation.

For example, when evaluating potential actions such as the options listed above in Step 6, school counselors would want to compare the potential outcomes of each option, being mindful to also consider the potential impacts and implications each action could have on other stakeholders such as colleagues, students, and their families. If a school counselor decides to take the action of refusing to serve as a 504 coordinator, they may consider if any colleagues within their building have the knowledge and skills needed to serve in this role, and how their service may impact students. In comparison, if a school counselor agrees to serve as a 504 coordinator while actively advocating against the role, they may explore how colleagues may perceive their advocacy and how their actions may impact the climate and culture within the school.

STEP 8: Consulting with peers. Before implementing the chosen course of action, school counselors are encouraged to seek consultation from other professionals, preferably their supervisors or other school counselors. Consultation can reveal various aspects of the course of action school counselors may not have previously considered and be beneficial for making decisions moving forward. School counselors should not work in isolation; consultation is vital when determining a final course of action.

In the examples above, school counselors may reach out to other school counselors within their district to gauge their role(s) in Section 504 coordination. They

may connect with their administrator to discuss the professional, legal, and ethical responsibilities of school counselors and the benefits versus challenges the school counselor may face in coordinating Section 504 within their building. Finally, the school counselor may reach out to other professionals within the field (e.g., higher education faculty, fellow school counselors, school-based clinicians/related service providers) for support and guidance.

STEP 9: Implementing the selected course of action. Once they have received consultation, school counselors move forward with the chosen course of action, remembering to document the steps they have gone through in making their decisions. Documentation may be particularly important in the event the school counselor's chosen action relating to Section 504 coordination is ever called into question. Using a case example, we explore the ethical dilemma of serving as a 504 coordinator as analyzed through the STEPS model.

Case Vignette

Ms. Villanueva, Rockwood Middle School's new school counselor, has been informed that serving as Section 504 coordinator for the school is a requirement of her position. While Ms. Villanueva has some familiarity with 504 plans, she has not received any formal training related to Section 504 from her preparation program. Feeling this situation presents an ethical dilemma, she turns to the STEPS ethical-decision-making model for support.

Ms. Villanueva begins by considering her emotional and intellectual response. Primarily, Ms. Villanueva feels conflicted. She wants to support her school, principal, and students appropriately. She is

also concerned, performing this role goes against the advice of organizations she trusts. Yet, Ms. Villanueva also feels she has unique training that enables her to think systemically, manage stakeholders, and support students' development. Next, she evaluates guidance from leading organizations. Ms. Villanueva is an active American School Counselor Association (ASCA) member and starts by reviewing ASCA position statements. Ms. Villanueva also graduated from a CACREP-accredited counseling program and reviewed CACREP guidance. After reviewing advice from leading organizations, Ms. Villanueva is torn: her duty to care for each and every student (including students with 504 needs) is clear; however, Ms. Villanueva is confused about the difference between identifying students and supervising students who qualify for 504 plans. As Ms. Villanueva continues exploring relevant laws and ethical guidelines, she considers students who have yet to be identified for 504 accommodations may not receive services if Ms. Villanueva does not facilitate the 504 team. Additionally, Ms. Villanueva considers the legal implications of her school not complying and not serving students with disabilities.

When considering the students' chronological and developmental levels, Ms. Villanueva is confident receiving 504 support is in the student's best interest so they can continue growing toward their greatest potential. Additionally, Ms. Villanueva considers her own development and past experiences as a school counselor. She recognizes her specialized training in counseling and human development equips her to uniquely understand and support students' learning and growth. Ms. Villanueva feels confident in her expertise and preparation regarding consulting with families and supporting students. From this lens, Ms. Villanueva knows she has

specialized skills that are well-suited to coordinating Section 504.

As Ms. Villanueva continues through the STEPS Model, she consults with trusted colleagues and is surprised to find that many of her peers and veteran school counselors currently serve as 504 coordinators in their respective settings. Given how often school counselors seem to coordinate 504 plans in their schools, Ms. Villanueva is curious what specific Section 504 training and support her colleagues have been provided. While Ms. Villanueva is confident in supporting students and collaborating with families, she believes she would benefit from more specific preparation regarding disability laws and Section 504 programming.

After applying moral principles and evaluating several different courses of action, it's time for Ms. Villanueva to decide and implement her next steps. Ms. Villanueva appreciates the potentially conflicting positionality between the needs and expectations of students, her district, and the school counseling profession regarding roles within Section 504. She finds herself weighing her confidence in her ability to implement systems to holistically support each and every student in her school alongside her knowledge and understanding of the responsibilities and obligations of a Section 504 Coordinator. Ms. Villanueva knows coordinating a comprehensive school counseling program includes collaborating with relevant stakeholders, such as classroom teachers and students' families. She also knows she has specialized knowledge in leading and facilitating groups and is responsible for advocating for each and every student in her setting, including those with disabilities. Finally, Ms. Villanueva considers the legal ramifications of not acting as the Section 504 coordinator. After careful deliberation, Ms. Villanueva determines she can ethically support

students in her role as school counselor and 504 coordinator, utilizing both roles in overseeing the implementation of Section 504 as an embedded part of the comprehensive school counseling program at her school. To ensure appropriate Section 504 coordination, she requests administrative support in pursuing supplemental training in Section 504 and resources for developing policies and systems to effectively incorporate Section 504 within the comprehensive school counseling program.

Discussion

School counselors are tasked with developing and implementing comprehensive school counseling programs designed to improve student achievement and support students' social/emotional development and well-being (ASCA, 2023). "Students" refers to *each and every* child and youth served within the school, including students with disabilities who may require additional academic and/or social-emotional support and services to access and benefit from their education. Therefore, similar to a general education teacher serving students regardless of ability in their classrooms, school counselors extend services, programming, and support to students of all abilities as well.

Regarding Section 504, the field has long debated the responsibilities of school counselors, most often taking the stance, school counselors should support, *not* coordinate, Section 504 programming (e.g., ASCA, 2025; Boulden & Goodman-Scott, 2024; Goodman-Scott & Boulden, 2019; Griener & Hatton, 2023; Lambie et al., 2019; Townsend & Yount, 2019). While this stance may help protect the school counselor's time, leaving space to design and implement comprehensive school

counseling programs, often there appears to be misalignment between this stance and actual practice in the field (ASCA, 2023). As job descriptions and/or supervisor authority require, many school counselors serve as Section 504 coordinators (ASCA, 2023). As previously established, OCR has made clear school counselors assigned as Section 504 coordinators are responsible for ensuring students with disabilities within their schools under Section 504 are evaluated, identified, and provided the services and support necessary to receive FAPE. Despite advocacy and tools designed to support school counselors in addressing the misalignment in recommended practices related to 504 coordination (Boulden & Goodman-Scott, 2024), the common practice of assigning 504 coordination to school counselors requires they receive adequate and comprehensive preparation to fulfill these expectations appropriately.

Influenced by ASCA's (2024) position indicating school counselors should not serve as Section 504 coordinators and the understanding that school administrators often require counselors to perform these duties, we turned to the STEPS model for guidance. Analyzing the nine steps helps to review this ethical dilemma systematically and may provide some clarity for professionals considering this issue.

We appreciate, however, that while the STEPS model may support professionals in clarifying this ethical dilemma, it does little to dampen the situational complexity. School counselors may feel an emotional obligation to actively serve students with disabilities under Section 504 but feel an intellectual pull toward restraint, guided by professional guidance and standards (Romano, et al., 2009). The emotional discomfort, hesitation, and fear may stem from an intellectual understanding that limited training and knowledge may negatively impact students, families,

colleagues, the school, and the district (Better-Bubon et al., 2021). These feelings may be further entangled when school counselors are assigned Section 504 coordinator responsibilities by a direct supervisor. In such cases, school counselors may feel an emotional obligation to serve as coordinators, fueled by an intellectual understanding that their livelihoods are directly tied to their ability to meet job requirements.

When placed in the role of Section 504 coordinator, school counselors must consider the requirements of the law and regulations, taking into account the potential legal consequences that may result from findings of noncompliance. This understanding must be weighed in coordination with ASCA and CACREP policies and standards, both directly linked to Section 504 and the ethical practices of school counselors. Some school counselors may perceive an ethical obligation to assume these responsibilities, even when they feel ill-prepared to coordinate Section 504 services. Factors contributing to this sense of obligation include their expertise in human development, advocacy, engaging families, and facilitating multidisciplinary stakeholders to support the development and success of each and every student, including those with disabilities. This may hold especially true when no other professional within the building is available and/or trained to serve as coordinator. Ultimately, the school counselor's unique skill set, though lacking formal training in Section 504 coordination, may often make them the most qualified school professionals in their building to oversee and lead the implementation of Section 504. Driven by ethical principles to intentionally support each and every student, and in consideration of the potential negative impact their refusal to serve might have on students' well-being, academic progress, and protection of civil

rights, some school counselors conclude they can ethically navigate both roles. These school counselors may find they can effectively integrate Section 504 procedures and oversight into their comprehensive school counseling program.

Recommendations/Implications

When professional organizations take a unilateral stance on practice issues, it gives little leeway for alternatives. Consequently, school counselors struggling to adhere to organizational position statements and policies may feel isolated and left to navigate uncharted waters without professional support. Despite stated positions from school counseling organizations against serving as Section 504 coordinators, many school districts require school counselors to serve in these roles. By taking a firm stance indicating it is inappropriate for school counselors to serve in this capacity (ASCA, 2025), professional organizations may fail to acknowledge the experiences of school counselors in the field and, in doing so, leave school counselors without the guidance and training necessary to enact the full spectrum of job responsibilities they encounter successfully. As such, school counselors may need to advocate for revisioning their role related to Section 504, challenging assumptions that may hinder their ability to transform practices and better meet the needs of students with disabilities within their schools (Watkinson, 2015).

Similar to colleagues before us (Hall, 2015), we further advocate for developing counselor preparation standards related to school district regulations, requirements, and responsibilities specific to disability law and the education of students with disabilities. Even when school counselors are not serving as Section 504 coordinators, they remain active in the Section 504 process.

They are responsible for working within the regulations of Section 504 and disability law. School counselors may inadvertently make recommendations or take actions misaligned with Section 504 rules and regulations without fully understanding this civil rights law. By adding standard(s) related to disability law, school counselors

in all programs would receive critical instruction in this area. Additional recommendations regarding policy and practice specific to state, district, school, and counselor education programs are provided in

Table 1:

Recommendations for District Policy and Preparation Programs

State, District, School Policy	School Counselor Preparation Programs
Identify best practice as being—school counselors will not serve as coordinators; but when needed, key support will be provided for school counselors in the role of Section 504 coordinator	Include disability and special education related content and materials, including IDEA and Section 504, into core school counseling curriculum
Policy clearly defining the role of the Section 504 coordinator and distinguishing between the role and other professionals' roles	Distinguish between Section 504 and IDEA rules and regulations and how they intersect with school counseling practices
Establish timeline and process for district/school wide evaluation of Section 504 procedures and implementation	Advocate for the development and inclusion of disability-related counseling competencies into counselor education accreditation standards, as recommended by Chapin et al. (2018)
Develop and require training for newly assigned Section 504 coordinators (including training on FAPE, documentation, roles/responsibilities, etc.) within a specified timeline (e.g. within 1 month, 3 months, etc.)	Advocate for professional organizations, such as ASCA, to provide guidance and actionable steps for school counselors serving as Section 504 coordinators
Outline avenues of support for Section 504 coordinators seeking guidance related to Section 504 and coordinator responsibilities	Collaborate with teacher preparation and educational leadership programs to build multidisciplinary awareness about the roles and responsibilities of school counselors in supporting school programs, teachers, administrators, and students, including students with disabilities
Indicate best practices related to evaluation, identification, selection of services and supports, placement, implementation, reevaluation, and the provision of FAPE for students receiving 504 services	Develop ongoing training and resources for school counselors serving as Section 504 coordinators
Establish a comprehensive system for communicating 504 plans to relevant faculty and staff	Within the school counselor preparation curriculum, review and examine the alignment between 504 coordination tasks and the primary

Develop ongoing training and resources such as virtual communities of practices (e.g., ECHO) for Section 504 coordinators throughout the district/state

components needed to implement a comprehensive school counseling program.

Explore ways in which 504 coordination duties may integrate with a comprehensive school counseling program, such as the ASCA National Model.

Conclusion

When asked to assume the role of Section 504 coordinator, school counselors may feel conflicted (Goodman-Scott & Boulden, 2019) due to guidance in the field indicating they should not be responsible for Section 504 implementation within their buildings (ASCA, 2025). School counselors may turn to the STEPS model to navigate this ethical dilemma. Given the complexity of this issue, and considering factors such as (a) professional guidance, (b) legal requirements, (c) the mission of a comprehensive school counseling program, and (d) the unique circumstances of the school population, setting, and workforce, using the STEPS model may lead school counselors to determine they can ethically serve as coordinators. In such circumstances, we advise school counselors to advocate for robust and ongoing training specific to disability law and Section 504. It is also recommended school counselors seek support and ask for clarification when needed. We suggest school counseling preparation standards reflect the experiences of school counselors within the field; therefore, including disability law and Section 504 within the standards is critical. School counselors play a vital role in creating a school environment where each and every student is supported, including students qualifying for Section 504 accommodations. By equipping school counselors with the knowledge and practices

necessary to better engage with Section 504, professional organizations and accrediting bodies can support an equitable and comprehensive school counseling program benefiting *each and every student*.

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