

504 Plan vs. IEP: Quick Comparison

Use this chart to organize questions for your school team. Eligibility and services must be decided individually through the appropriate evaluation process.

Compare	Section 504 plan	IEP under IDEA
Legal basis	Section 504 of the Rehabilitation Act - a federal civil-rights law.	Individuals with Disabilities Education Act - the federal special-education law.
Who may qualify	A student with a physical or mental impairment that substantially limits a major life activity. The student may qualify even without needing special education.	A student who meets an IDEA disability category and, because of that disability, needs special education and related services.
Primary focus	Equal access: removes disability-related barriers so the student can participate in school.	Educational progress: provides specially designed instruction plus needed related services and supports.
Instruction	May include regular or special education and related aids/services needed for FAPE, but IDEA-style specially designed instruction is not the eligibility test.	Includes specially designed instruction adapted to the student's unique needs.
Typical contents	Documents the student's needs and the aids, services, accommodations, or modifications the school will provide. Format varies by district.	Includes present levels, measurable annual goals, services, accommodations, progress reporting, and placement details.
Review and reevaluation	Schools must reevaluate periodically and before a significant placement change. Federal Section 504 rules do not set one universal annual review schedule.	The IEP is reviewed at least annually. Reevaluation is at least every 3 years unless the parent and school agree it is unnecessary.
Parent protections	Notice, access to records, an impartial hearing, representation by counsel, and a review procedure.	Detailed IDEA procedural safeguards, including prior written notice, participation, mediation, state complaints, and due process.
A useful starting question	Would accommodations, aids, or related services give my child meaningful access to school?	Does my child need specially designed instruction to make appropriate progress?

Bring to the meeting

1. Examples of how the concern affects school. 2. Recent work samples or progress data. 3. A written request asking the school to evaluate and explain which legal path it is considering.

Sources: [U.S. Department of Education Section 504 FAQs](#); [IDEA 34 CFR 300.324\(b\)](#); [IDEA 34 CFR 300.303](#). Educational information only, not legal advice. State and local procedures can add requirements. Updated September 2026.
specialneedsusa.com/guides/504-plan-vs-iep-guide