Mergener Credit-Hour Calculation

Course: Section 504 School Discipline: Legal & Ethical Responsibilities for Psychologists (6 CE credits, Legal/Ethics)
Provider: Child & School Psychology CE · Jaime Flowers, Ph.D., NCSP, LEP, BCBA
Revision: October 25, 2026. Replaces the worksheet dated October 2026. The primary reading changed from the 2022 OCR guidance (rescinded by the U.S. Department of Education) to the Section 504 regulations and related federal regulations listed below.

Formula

Minutes = 0.9 × [–22.3 + (0.00209 × words) + (2.78 × learner items) + (15.5 × difficulty)]

Required reading (counted once)

Required reading component	Assigned in	Words
34 CFR §§ 104.1–104.10 (Part 104, Subpart A, regulation text)	Lessons 1, 2, 6, 7, 8	3,186
34 CFR §§ 104.31–104.39 (Part 104, Subpart D, regulation text)	Lessons 1, 3, 4, 5, 8	2,134
34 CFR § 104.61 (Procedures)	Lesson 8	34
34 CFR Part 104, Appendix A (Analysis of Final Regulation), Subparts A, D and G	Lessons 1–8	7,330
28 CFR § 35.130 (ADA Title II general prohibitions, incl. (b)(7))	Lesson 6	1,119
34 CFR § 300.530 (IDEA, authority of school personnel; manifestation determination)	Lesson 4	1,268
34 CFR § 300.536 (IDEA, change of placement because of disciplinary removals)	Lesson 5	172
Total required reading		15,243

Counting method. Each component was counted directly, not estimated: the official text was retrieved from the eCFR versioner XML for the edition current as of October 19, 2026, and words were counted by splitting the text of each section (including its heading and source note) on white space. Appendix A was counted only for the Subpart A, D and G analysis paragraphs assigned in the lessons; the Subpart B, C, E and F analysis (employment, accessibility, postsecondary, and health and social services) is not assigned and is not counted. The prior worksheet's reading figure (16,351 words) was an estimate carried forward from an earlier worksheet; it is replaced by the counts above.

Not counted. The 2022 OCR guidance, *Supporting Students with Disabilities and Avoiding the Discriminatory Use of Student Discipline under Section 504 of the Rehabilitation Act of 1973*, is linked only as optional historical background (rescinded; historical purposes only). Short statutory and case-law notes in the lessons (42 U.S.C. § 12102; 29 U.S.C. § 705(20); *Alexander v. Choate*, 469 U.S. 287 (1985); Executive Order 14281) are not separately assigned and are not counted as reading.

Inputs by component

Component	Prior words	Change	Instructional words	Word term	Items	Item term
Lesson 1: Foundations and Disability-Based Discipline	1,051	+155	1,206	2.52	7	19.46
Lesson 2: Who Is Protected Under Section 504	887	+96	983	2.05	6	16.68
Lesson 3: FAPE, Behavioral Needs, Preventive Supports	1,012	+25	1,037	2.17	5	13.90
Lesson 4: Evaluation and Reevaluation	1,050	+203	1,253	2.62	11	30.58
Lesson 5: Removals and Significant Changes in Placement	1,080	+140	1,220	2.55	11	30.58
Lesson 6: Reasonable Modifications to Discipline Policies	1,286	+213	1,499	3.13	11	30.58

Lesson 7: Avoiding Disability Discrimination	1,023	+130	1,153	2.41	10	27.80
Lesson 8: Applied Legal and Ethical Decision-Making	1,260	+82	1,342	2.80	11	30.58
Required reading (above, counted once)	16,351 (est.)	—	15,243	31.86	—	—
Final assessment (41 multiple-choice items)	—	—	not counted	—	41	113.98
Total	25,000		24,936	52.12	113	314.14

Lesson word changes. The revision replaced each lesson's reading instructions and rewrote passages that had relied on the rescinded guidance. The change for each lesson was measured by counting the lesson's instructional text before and after the revision with the same method and adding the difference to the prior verified count. Learner items in the lessons did not change. In the final assessment, two items were replaced and several were revised; the total remains 41.

Calculation

Term	Value
Constant	–22.30
0.00209 × 24,936 words	52.12
2.78 × 113 items	314.14
15.5 × difficulty (4, unchanged)	62.00
Sum	405.96
× 0.9	365.36 minutes
÷ 60	6.09 hours

Result

Estimated learner time: **6.09 hours** (365.4 minutes). CE credits awarded: **6.0** (Legal/Ethics), which does not exceed the estimate. The credit award is unchanged by this revision.