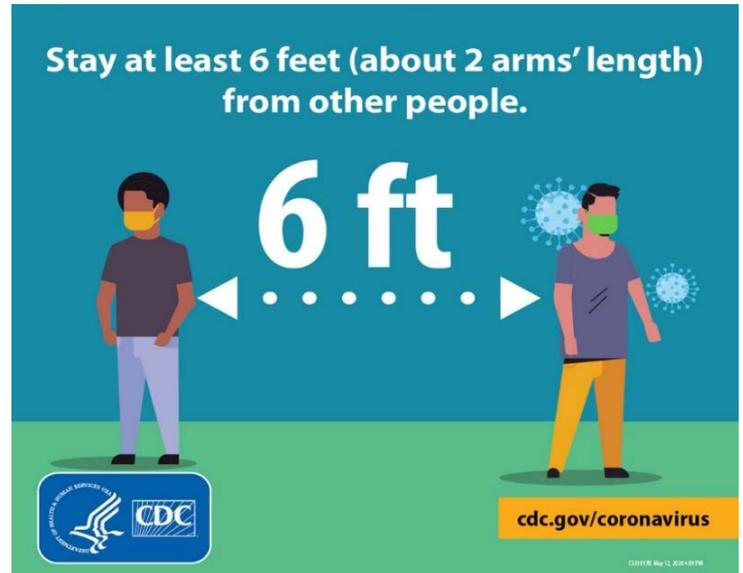


November 2020

# Accommodating Students with Disabilities

## During COVID-19 Pandemic



## Background and Reasonable Accommodation

Applicants/students with disabilities **may** need reasonable accommodations related to COVID-19. Centers will ensure that applicants/ students are aware of the process for requesting an accommodation, that the process is interactive, and that the centers' staff are trained to evaluate and provide accommodations related to COVID-19 health precautions (See ***PIN 20-08, Job Corps Center Resumption of Physical Center Operations Checklist for COVID-19***).

## Distance Learning Plans and Reasonable Accommodation

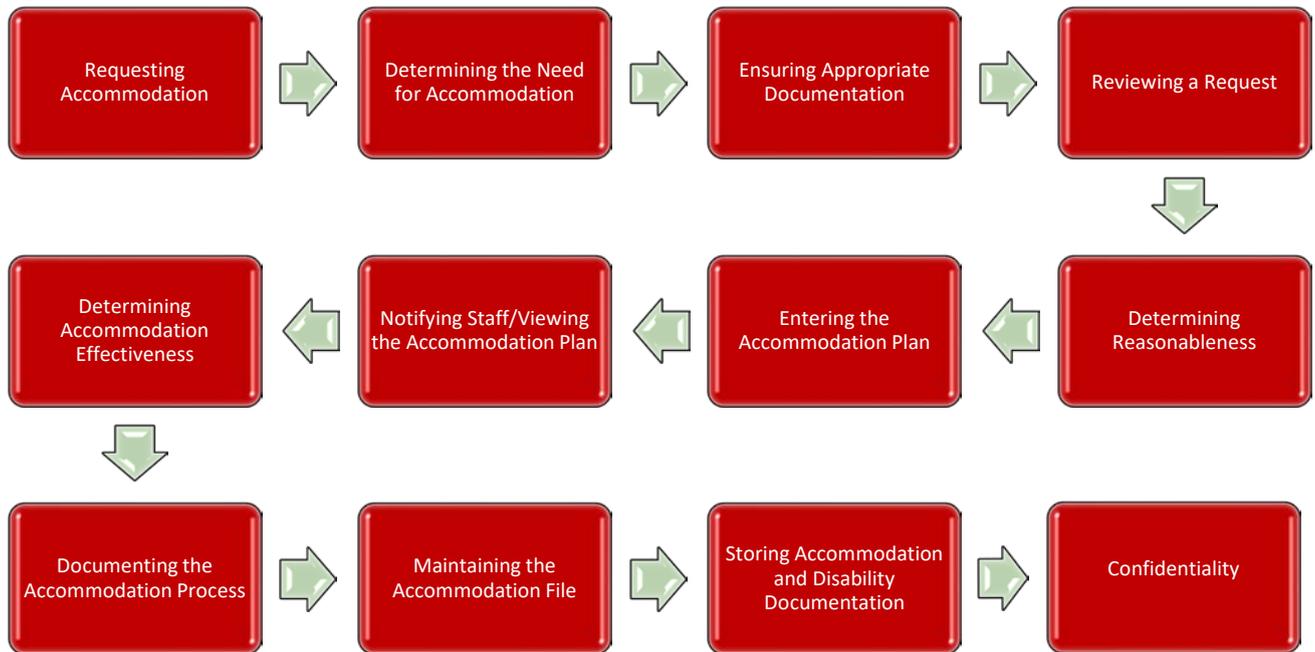
As per ***PIN 20-04, Providing Online and Correspondence Distance Learning***, center Distance Learning Plans must include

- How the center notifies students with disabilities of their right to request and receive reasonable accommodation to participate in distance learning training and related activities including the method this procedure is communicated to students.
- Center Disability Coordinators (DCs) should participate in the weekly distance learning scheduling meetings, be familiar with the courses and activities assigned to students with accommodation plans and assist in adjusting or modifying accommodation plans for the distance learning environment.
- DCs also should ensure that accommodation effectiveness reviews are being completed and documented as per ***PRH Form 2-03: Definitions and Documentation Requirements Related to Reasonable Accommodations for Applicants and Students with Disabilities***.

See ***Reasonable Accommodation Process*** below for guidance on ensuring that students with disabilities are engaged in an interactive reasonable accommodation process.

## Reasonable Accommodation Process

The Disability Coordinator (DC) must ensure that the interactive reasonable accommodation process is completed for each applicant/student who requests accommodation or provides documentation of disability. See [Form 2-03](#).



## Alternative Accommodations

If the center deems an accommodation request as potentially ***unreasonable***, the Reasonable Accommodation Committee (RAC) **must** first determine if there are **alternative, yet equally effective accommodations** that could address that same need and be offered to the applicant. For example: Instead of allowing a student with a sleep disorder to nap during the day, perhaps the RAC could offer 1-2 regular breaks a day, more frequent movement opportunities, access to gym at lunch, alter schedule so certain activities (if any in career technical) are scheduled when the individual is typically the most alert, etc.

- If yes, document the applicant's acceptance or rejection of each equally effective accommodation.
- If not, or if the applicant rejected all the alternative accommodations, the center DC should recommend denial of the requested accommodation.

Contact your Regional Disability Coordinator (RDIC) for assistance!

# Reasonable Accommodation Resources (Job Corps Disability Website)

<b>Documentation of Disability</b> <small>Reasonable Accommodation Process</small>	<b>1 Document the Process</b> Notes documenting the reasonable accommodation process should be entered into the CIS Accommodation Notes Tab and should include: a. Initial accommodation call and/or meeting with applicant or student. b. Any subsequent meetings with applicant or student regarding accommodations. c. Any updates to the accommodation plan. d. Accommodation effectiveness reviews which includes feedback from student and staff working with students about effectiveness of plan. e. Documentation of the referral process, if applicable. f. Request for accommodations for certification/HSE exams. g. Coordination with partnering agencies.	<b>Requesting a Reasonable ACCOMMODATION</b> 
<b>2 Contact Pre-Arrival Based on Disclosure/Documentation</b> a. Review supporting documentation provided and contact the applicant to explain the center Disability Program and to begin the interactive reasonable accommodation process. (See Form 2-03 for more details). b. Document the contact and the accommodations that will be agreed upon and those refused on the Reasonable Accommodation Request Form-Documentation of Disability (RARF-DOD) or Reasonable Accommodation Request Form-Program (RARF).	<b>2 Create the Accommodations File (AF)</b> The file should be stored in a secured area and contain the following: a. Documentation of Disability (Medical documentation is stored in Student Health Record) b. RARF DOD or RARF c. Signed AP d. Accommodation Effectiveness Review documentation e. Referral Documentation, as appropriate	<b>3 Create the Accommodations File (AF)</b> The effectiveness of a student's AP will be evaluated (student and staff feedback) and documented (student's AP and information CIS Accommodation Notes tab) as part of student performance panels at least every 60 days.
<b>3 Develop Accommodation Plan</b> a. Meet with the student when s/he arrives on center to discuss accommodations agreed upon during initial call/meeting and finalize an Accommodation Plan (AP). b. Ensure completion of the RARF-DOD or RARF, including student and DC signatures. c. Enter the agreed upon accommodations into the CIS Accommodation Plan entry screen. d. Print the student's AP. e. Both the student and the DC should sign the student's AP. f. Provide the student a copy of AP.	<b>3 Enter the Student's Disability(ies) into the CIS Disability Data Collection</b> E-mail notification should be sent to all staff, at least bi-weekly, with a list of students with APs. This list should indicate which plans are new APs and which plans are updated.	<b>4 Send AP to Record.</b> Once the student separates, the student's AP should be sealed in an envelope and sent to the Records Manager.

Documentation of Disability: Reasonable Accommodation Process

<b>Applicant Requests Accommodations</b> <small>Reasonable Accommodation Process Approved for Enrollment</small>	<b>1 Begin Interactive Reasonable Accommodation Process - Pre-arrival Contact</b> a. Review accommodation request/supporting documentation and contact the applicant to begin the interactive reasonable accommodation process. (See Form 2-03 for more details). b. Document the contact and each accommodation discussed, whether accepted or rejected, on the Reasonable Accommodation Request Form-Program.	<b>Requesting a Reasonable ACCOMMODATION</b> 
<b>2 Develop Accommodation Plan</b> a. Meet with the student when s/he arrives on center to discuss accommodations agreed upon during initial call/meeting and finalize an Accommodation Plan (AP). b. Ensure completion of the Reasonable Accommodation Request Form-Program, including student and DC signatures. c. Enter the agreed upon accommodations into the CIS Accommodation Plan entry screen. d. Print the student's AP, both the student and the DC should sign the student's AP. e. Provide the student a copy of AP.	<b>2 Create the Accommodations File (AF)</b> E-mail notification should be sent to all staff, at least bi-weekly, with a list of students with APs. This list should indicate which plans are new APs and which plans are updated.	<b>3 Create the Accommodations File (AF)</b> The file should be stored in a secured area and contain the following: a. Documentation of Disability (Medical documentation is stored in Student Health Record) b. Job Corps Reasonable Accommodation Request Form-Program c. Signed AP d. Accommodation Effectiveness Review documentation e. Initial contact call and/or meeting notes f. Referral documentation, as appropriate
<b>3 Enter the Student's Disability(ies) into the CIS Disability Data Collection</b>	<b>3 Notify Staff of AP</b> E-mail notification should be sent to all staff, at least bi-weekly, with a list of students with APs. This list should indicate which plans are new APs and which plans are updated.	<b>4 Send AP to Record.</b> Once the student separates, the student's AP should be sealed in an envelope and sent to the Records Manager.

Applicant Requests Accommodations: Reasonable Accommodation Process

## Reasonableness and Accommodation Recommendation of Denial Snapshot

**PRH Policy Form 2-03**

**Reasonableness and Accommodation Recommendations of Denial**

Centers may not deny accommodation requests from applicants but can recommend denial of an accommodation or accommodations if the center has completed a "reasonableness" review and believes that the accommodation or accommodations is/are unreasonable (i.e., undue hardship or fundamental alteration of the program).

**NOTE:** Ensure that the accommodation request is specific. If it is NOT, then the center Disability Coordinator should work with the applicant/student to define the specific needs. For example, if a student were to request a paraprofessional to help with academics: What are the specific tasks the paraprofessional is needed to perform?

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### Reasonableness Review

1. Ensure that the accommodation request is documented on a Reasonable Accommodation Request Form (RARF). If you do not have a blank form, the RARF may be found in PRH Form 2-03.
2. Is the request from an outside treating provider, parent, case worker, etc.? If so, verify with the applicant/student that they wish to have the specific accommodation.
  - a. If so, continue with the interactive reasonable accommodation process.
  - b. If not, document the applicant/student's refusal or rejection of the accommodation consideration and no further consideration is needed.
3. Determine the reason for the accommodation. Is there information or documentation that supports the accommodation request?
  - a. If so, continue with the interactive reasonable accommodation process.
  - b. If not, offer the applicant/student an opportunity to provide documentation to support the request.
4. Is the accommodation request reasonable?
  - a. If the center believes the request may not be a reasonable one, complete a reasonableness review to determine if the accommodation potentially is either an undue hardship (significant difficulty or expense incurred) unduly costly or fundamental alteration (alters essential nature or operation of the program or would result in an undue burden) to the program. Calculate costs and/or document how the accommodation is believed to be unreasonable. See Determining Reasonableness section in PRH Form 2-03.
  - b. If the center deems the accommodation request as potentially unreasonable, are there alternative, yet equally effective accommodations that could address that same need and be offered to the applicant? For example: Instead of allowing a student with a sleep disorder to nap during the day, perhaps the Reasonable Accommodation Committee (RAC) could offer 1-2 regular breaks a day, more frequent movement opportunities, access to gym at lunch, alter schedule so certain activities (if any in career technical) are scheduled when the individual is typically the most alert, etc.
    - If yes, document the applicant's acceptance or rejection of each equally effective accommodation.
    - If not, or if the applicant rejected all of the alternative accommodations, the center Disability Coordinator (DC) should recommend denial of the requested accommodation.

Reasonableness and Accommodation Recommendation of Denial Snapshot

# Accommodation IDEAS for Students with Disabilities During COVID-19

If a student with a disability requests accommodation(s) specific to COVID-19, convene the RAC and consider each of the student's requests. If the center believes that an accommodation is unreasonable, offer alternative accommodations that likely would be equally effective and reasonable. If the student and the center cannot agree on the accommodation, then the center may need to submit an *Accommodation Recommendation of Denial* to your RDIC. The RDIC will coordinate the review of the accommodation request with the Regional/National Office who will make the final decision as to whether the accommodation is to be provided. See the screenshot of the *Reasonableness and Accommodation Recommendation of Denial Snapshot* document on page 3 and the full document on the Job Corps Disability Website.

## Facemasks/Face Coverings

Consider accommodations for students who have conditions, histories or backgrounds that make wearing a mask difficult:

### Sensory concerns

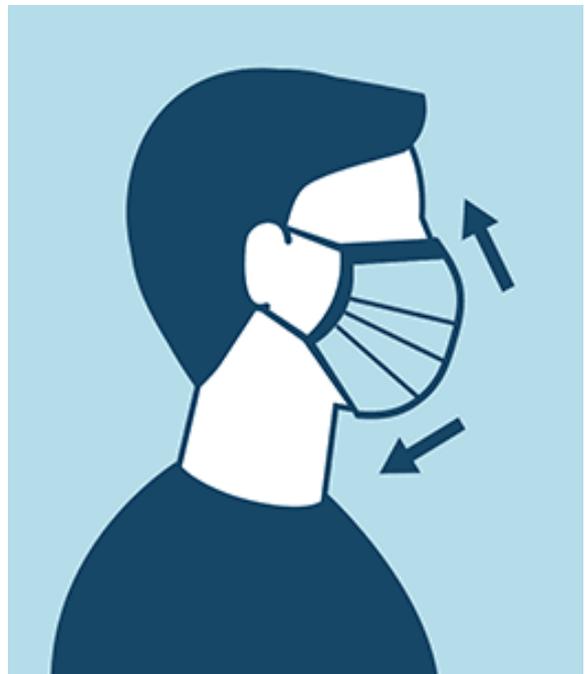
- Permission to wear a mask made of different fabric or of a different style
  - Mask with adjustable loops versus one without; mask that ties in the back versus one with loops over the ears, etc.
  - Mask made of soft cotton fabric with few or no seams

### Respiratory concerns

- Limit the physical distance the student needs to walk/move around campus or go up and down stairs
- Allow the student to complete some classes through distance learning in their dormitory room or other private area that they would not need to wear a mask
- Allow the student to attend meetings virtually or by phone
- Allow the student to remain in distance learning

### Mental health reasons

- Allow student to take breaks outside or in an area where they may take off their mask safely (i.e., with supervision or an area identified as safe to do so by staff)
- Provide access via scheduling adjustments, for virtual or in-person sessions with the Center Mental Health Consultant or counselor as needed, tele-mental health, or transportation to off-center appointments
- Provide access to phone or tablet apps that assist with stress and anxiety management



## Mental health reasons (cont'd)

- Provide stress balls and other fidgets or items\* that may soothe the student
- Allow the student to complete some classes through distance learning in their dormitory room or other private area where they would not need to wear a mask
- Allow the student to attend meetings virtually or by phone
- Allow the student to remain in distance learning

\*For COVID-19 safety, assign items to a student and do not allow sharing of items such as stress balls, fidget items, etc.

## Deaf or Hard of Hearing

- Allow use of a clear mask so that students who use lip reading to communicate or assist with communication
- Allow or provide use of portable text communication devices

## Communication Access

Remember that communication effectiveness is a separate legal requirement from providing general accommodations because communication is essentially “meaningless” if it is not effective.

Ensure information provided to students related to COVID-19, schedules changes, expectations (cleaning protocols, new/updated daily responsibilities, cafeteria protocols, new/updates rules) are provided in accessible formats for students with disabilities that impact communication.



## Special Considerations

### Visual Impairments or Blindness



Individuals who have significant visual impairments or who are blind are going to need to rely on auditory support (i.e., call the individual by name before speaking to them and provide clear and specific directions or information to the individual about the environment or the situation in which they need assistance) and/or some degree of touch. Also, when making general modifications like installing signs to remind students that they must be wearing masks, to social distance 6 feet or more apart, etc., consider purchasing signs that include Braille language as well.

See **Social Distancing, Visual Impairment or Blindness** below.

## ***Autism Spectrum, Anxiety Disorders, Language Disorders, and Hearing Impairments or Deafness***

These students may require accommodation considerations that provide more than the standard communication about how things will be on center with COVID-19 precautions etc. (e.g., multiple means of communicating, extra processing time, cues and notifications about impending changes forthcoming, etc.).

### **General Communication Considerations**

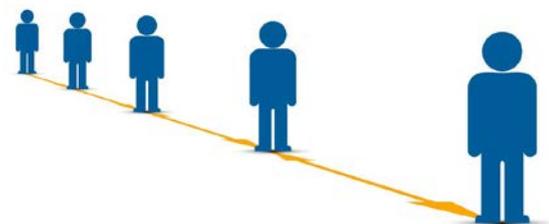
- Provide information in format needed to aid understanding
  - Digital Formats
    - Audio files or read aloud options
    - Videos (including demonstrations of how to complete tasks in residential, academic, career technical, etc.)
    - Large print
- Provide electronic materials (e.g., Microsoft Word, Adobe, etc.) so the student can use read aloud apps such as Immersive Reader or Adobe Read Out Loud, etc.
- Assist student (or offer peer support from the same cohort) in developing or provide checklists for new protocols related to COVID-19 safety (i.e., hygiene, area cleaning, laundry, and other COVID-19-related responsibilities)
- Provide electronic copies of new schedule and review multiple times if needed; have the student state their understanding in their own words
- Provide picture supported task lists and task activities to include the materials needed to complete each task
- Verify student's understanding of expectations, rules, and consequences by having them restate the information in their own words or via electronic means (i.e., type their understanding in a WORD document)

## **Social Distancing**

Consider accommodation for students who may require assistance with social distancing such as individuals who are visually impaired or blind, who have cognitive or behavioral challenges, etc. Remember to ask the student what works best for them!

### **Visual Impairment or Blindness**

- Provide a peer buddy to prompt and or assist the student in navigating areas where they may have to stand in line
  - Provide training or guidance to the peer buddy on proper etiquette and how they may appropriately assist.



For example, when prompting a peer who is blind, they would need to remember to state the student's name first so they would understand that they are being spoken to

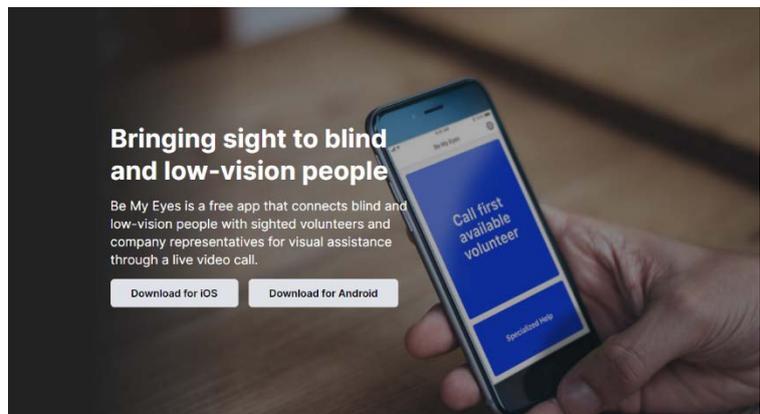
Guidance from Lighthouse Guild: *"Speak up. If you think someone may be coming near you, speak up! The other person may not be mindful that you are approaching. When in public spaces announce your presence. Use verbal cues, such as: "Please let me know when I can move up in the line." "My dog is not trained for social distancing, so please direct me, and I'll direct him," or "My apologies for coming so close, it's very difficult to tell how far apart to be, so if you can move farther away, that would be great."*<sup>1</sup>

- Provide personal guidance (i.e., offer and allow student to hold your elbow or arm for navigational guidance); this support should be provided by staff and not a student, and masks and gloves should be worn by the staff person

#### *General Note About Assisting Someone Who is Blind or Visually Impaired with Navigation*

When providing navigational guidance, provide specific details to the student. For example, "the door to the restroom is 2-3 feet in front of you and the doorknob is an accessible handle located on the right hand side", and then provide detailed information for navigating the actual restroom as well. Check with Division of Vocational Rehabilitation to determine if they might be able to provide a mobility coach to assist with center navigation in the first weeks of attendance on center.

- Provide hand over hand guidance if needed; this support should be provided by staff and not a student, and masks and gloves should be worn by both the staff and the student
- Provide and/or allow the use of phone apps such as **BE MY EYES**. The student who is blind can contact a volunteer via the app who will then use the individual's camera to assist them in navigation, reading instructions, or providing information about a specific environment.
- Allow the use of phone cameras for magnification



[www.bemyeyes.com](http://www.bemyeyes.com)

### **Hard of Hearing or Deaf**

Make available to classmates, roommates, and staff a mask option that has a clear section near the mouth for use in lip reading. Visit the Job Accommodation Network for more information on these masks as well as vendor options: <https://askjan.org/solutions/Masks-Clear.cfm>.

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<sup>1</sup> Retrieved 10/5/20: <https://www.lighthouseguild.org/newsroom/how-people-who-are-blind-or-have-low-vision-can-safely-practice-social-distancing-during-covid-19/>

## Residential Living

- Provide a private room, if possible, for an individual who is high risk for COVID-19 complications
- Offer alternative accommodations for a private room (if one is not available) that might reduce the risk such as putting up barriers between individual spaces or modifying schedules to reduce the amount of time roommates are in the room together
- Clearly delineate spaces in the dormitory that each student will store and access personal items



## Group Situations

### General

- Allow high risk individuals to participate in group meetings virtually (from private room) or eat meals in private room since no masks can be worn
- Assign classroom materials and/or supplies to each individual student or if a student is at high risk ensure those students are assigned materials that only they will use, touch, and clean. Ensure adequate supplies of materials used in classroom and group situations to minimize sharing of materials.

### Meals and Snack Access

Consider accommodations for students whose disabilities may cause barrier to access the new automated food services ordering system

- Provide picture-supported directions on how to use the automated system
- Develop and provide video directions of a walk-through of a staff member or fellow student utilizing the automated system

If there are physical, communication, or cognitive barriers that prevent a student from utilizing the automated food services ordering system

- Assign a staff member to assist the student/buddy with ordering food
- Provide the student with electronic lists of food options from which the student may choose and then a staff person inputs the requested meal items



*University of San Francisco Classroom Setup*

If a student has a medical condition that requires frequent snacks, food substitutions, etc. (e.g., diabetes, allergies, celiac disease, etc.)

- Provide and ensure access to needed food items that meets the student's needs at additional times during the day or evening in the areas that the student is located

### **Bathrooms**

- Provide access to a private bathroom for a student who is high risk or immune-compromised or allow student to go to Wellness Center to use facilities there during the training day
- Adjust schedule to allow student who is high risk to use the shower/bathroom facilities in dorm first after shower/bathroom facilities have been cleaned

### **Elevators**

- Restrict elevator use, if available, to a limited number of students, most specifically, those who are high risk or immune-compromised to avoid more crowded hallways or stairwells
- Allow students at a high risk to leave class early to use elevators, hallways, and stairwells to minimize contacts with others

## **Health-related Appointments**

Some students may need to attend appointments for medical care to include mental health, substance use and/or oral health care.

- Adjust the students schedule to allow attendance or participation to the scheduled appointment
- Provide a private room or private space such as in the Wellness Center where the student can attend tele-medicine appointments
- If off-center appointments can be accessed safely, provide transportation to and from local appointments



## **Distance or In-person Learning**

### **Returning students with disabilities to centers**

Consider accommodations for students that are high risk for COVID-19 complications.

- Allow the student to continue participating via distance learning if the student's program and course goals can be accomplished via that learning/training medium
- Provide students at high risk with plastic/glass partitions during classes or group situations
- Schedule high risk student in classes with small groups, if possible, if the individual must attend in-person classes to complete the program