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)

Applicant Requests Accommodations: Reasonable Accommodation Process

Documentation of Disability: Reasonable Accommodation Process

Reasonableness and Accommodation Recommendation of Denial

### Reasonableness Review

1. Ensure that the accommodation request is documented on a Reasonable Accommodation Request Form (RARF). If you do not have a hard copy, the RARF may be found in HHRM Forms 2 and 20.

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.

3. If so, continue with the interactive reasonable accommodation process.

4. If not, document the applicant/student’s refusal or rejection of the accommodation consideration and no further consideration is needed.

5. Determine the reason for the accommodation. Is there information or documentation that supports the accommodation request?

6. If so, continue with the interactive reasonable accommodation process.

7. If not, offer the applicant/student an opportunity to provide documentation to support the request.

8. Is the accommodation request reasonable?

9. If the request is reasonable, the accommodation should be implemented.

10. If the request is not reasonable, the accommodation should be denied.

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**Reasonableness and Accommodation Recommendation of Denial**

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- If you do not have a hard copy, the RARF may be found in HHRM Forms 2 and 20.
- 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.
- If so, continue with the interactive reasonable accommodation process.
- If not, document the applicant/student’s refusal or rejection of the accommodation consideration and no further consideration is needed.
- Determine the reason for the accommodation. Is there information or documentation that supports the accommodation request?
- If so, continue with the interactive reasonable accommodation process.
- If not, offer the applicant/student an opportunity to provide documentation to support the request.
- Is the accommodation request reasonable?
- If the request is reasonable, the accommodation should be implemented.
- If the request is not reasonable, the accommodation should be denied.
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.”

- 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

**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](https://askjan.org/solutions/Masks-Clear.cfm).

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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
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