

## **Alternative Educational Arrangements for Student who are at Higher Risk for Severe Illness**

*It is important to note that an institution's legal obligations to consider and process student accommodation requests under the ADA and Section 504 has not changed as a result of the onset of the COVID-19 pandemic. However, the nature of the interactive process and the determination of reasonable accommodations may be affected by the COVID-19 pandemic. USG institutions should continue to follow their normal procedures for any the ADA and Section 504 accommodations requests institutions receive from students.*

Students who fall into one of the following CDC categories for being at higher risk for severe illness due to COVID-19 may request an alternative educational arrangement. Students who believe that they fall into one of the risk categories must submit a request for an alternative educational arrangement. Institutions will then undertake efforts to provide a reasonable alternative arrangement for the requesting students. Students must submit documentation demonstrating that they have one of the underlying medical conditions as part of their requests. The nature of a reasonable accommodation or alternative educational arrangement may be affected by the unique circumstances of the COVID-19 pandemic and will be an interactive process. Decisions about what reasonable alternative arrangements are feasible will be made on a case-by-case basis, and the decision may vary by institution and by student depending on the particular circumstances involved.

Note: Because of potential legal issues, an institution should NOT proactively identify students who have conditions or are perceived to have conditions that place them at a higher risk for severe illness with COVID-19. Students must initiate requests for alternative educational arrangements.

### Qualifying CDC categories for higher risk for severe illness with COVID-19:

*Students who are 65 or older* (Students who are younger than 65 can provide documentation from a health care provider that their age is a determining factor for risk that should prevent them from attending and participating in regular on-campus instruction.)

### *Students with the following underlying medical conditions:*

- Chronic kidney disease
- COPD (chronic obstructive pulmonary disease)
- Immunocompromised state (weakened immune system) from solid organ transplant
- Obesity (body mass index [BMI] of 30 or higher)
- Serious heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies
- Sickle cell disease
- Type 2 diabetes mellitus
- Asthma (moderate-to-severe)
- Cerebrovascular disease (affects blood vessels and blood supply to the brain)

- Cystic fibrosis
- Hypertension or high blood pressure
- Immunocompromised state (weakened immune system) from blood or bone marrow transplant, immune deficiencies, HIV, use of corticosteroids, or use of other immune weakening medicines
- Neurologic conditions, such as dementia
- Liver disease
- Pregnancy
- Pulmonary fibrosis (having damaged or scarred lung tissues)
- Smoking
- Thalassemia (a type of blood disorder)
- Type 1 diabetes mellitus

If a student requests an alternative educational arrangement based on one of the qualifying risk categories and provides supporting documentation, then the institution should engage in an interactive process with the student to determine a reasonable alternative educational arrangement. This process will be similar to the way that institutions address ADA and Section 504 accommodation requests from individuals with disabilities and/or temporary impairments.

### **Process to Request Alternative Educational Arrangements**

Institutions should determine the most efficient process for students to request alternate educational arrangements. Processes should be well-publicized and documented. The processes can be the same as or reflective of the normal process for requesting accommodations under the ADA and Section 504. Medical documentation demonstrating that the student has one of the risk factors is required for underlying conditions.

Note: Institutions should keep statistics for reporting purposes as they would for the typical annual report to the University System of Georgia

### **Example Alternative Educational Arrangements**

Accommodations and alternative educational arrangements should be determined through the interactive process in the same manner as the process for determining accommodations for non-COVID-19 related disabilities. However, the nature of a reasonable accommodation or alternative educational arrangement may be affected by the unique circumstances of the COVID-19 pandemic. Below is a list of potential accommodations and alternative educational arrangements that could be considered by institutions as part of the interactive process. These are meant only as examples. This list is meant purely as an aid, and is not intended to indicate that the listed accommodations and arrangements must be granted, nor that other accommodations and arrangements are not available:

- Course substitutions (with permission of the appropriate academic department)
- Adaptation of modality (lecture capture, synchronous/asynchronous, online, etc.)
- Smaller groups for labs, etc...

- Alternatives to traditional masks (such as scarves, special masks for glasses wearers, or clear face shields\*)
- Clear masks (this may be necessary for all students in the class, group members, and/or the professor)
- Modified performances
- Assistance in demonstration of physical activities (for physical education courses, dance classes, etc...) if student experiences difficulty demonstrating and explaining because of their disability and wearing a mask
- Modified arrival/departure times for classes
- Instructions provided in written format
- Ability to use computer in class
- Ability to record class
- Rental of hearing amplification devices
- Rental of recorders
- Peer notetaker
- Preferential seating
- Priority registration (anticipating that COVID-19 is still around going into the Spring 2021 semester)
- Waiver of live-on requirement
- Housing Modifications, if available
- Modified Attendance Agreement
- Additional PPE

\*Note that the CDC warns against substituting a face shield for a face covering.

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover-guidance.html>

#### *Face Shields*

*It is not known if face shields provide any benefit as source control to protect others from the spray of respiratory particles. CDC does not recommend use of face shields for normal everyday activities or as a substitute for cloth face coverings. Some people may choose to use a face shield when sustained close contact with other people is expected. If face shields are used without a mask, they should wrap around the sides of the wearer's face and extend to below the chin. Disposable face shields should only be worn for a single use. Reusable face shields should be cleaned and disinfected after each use. **Plastic face shields for newborns and infants are NOT recommended.***