

Beyond High-Risk: Update for Fall 2021

Accessible Campus Action Alliance

Updated 25 August 2021.

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The Ongoing Crisis

In the Summer of 2020, colleges and universities announced plans for remote and hybrid operations for the Fall term in response to the COVID-19 pandemic, The Accessible Campus Action Alliance, a group of disabled and allied faculty, published “Beyond High-Risk: Statement on Disability and Campus Re-Openings” (full text below). As Fall 2021 terms begin in the U.S. and Canada, we face a new series of crises. The only effective responses will be those that foreground inclusion and justice for faculty, staff, students, and communities. We are against a “return to normal.” We need a new, more accessible normal.

In 2020, we wrote: “As a matter of justice, equity, and ethics, we call upon university administrators and communities to value the lives of marginalized, racialized and disabled people over the purported economic value of campus re-openings.” In 2021, this is more important than ever. The availability of COVID-19 accommodations such as remote work provided greater and

more equal access to disabled people, even compared to the pre-pandemic period. While the greater availability of vaccinations in the U.S. and Canada has altered the conditions for safe operations, there remain significant concerns for the populations within and connected to our campuses, including:

- Disabled and chronically ill people who are not able to be vaccinated or whose immune responses to vaccination are unknown, [poor](#), or time limited;
- Disabled and older people whose risk factors for “breakthrough” infection are higher;
- Households with children under 12 who are not eligible for vaccines or with disabled people or others who are at higher risk;
- Disabled faculty and students coping with the stresses of frequent pivoting between online and in-person learning as public health crises emerge;
- Disabled faculty and students for whom masked interactions are inaccessible, such as deaf or hard of hearing people (as addressed in [OSHA Guidelines](#));
- COVID-19 long-haulers, including faculty, staff, and students, whose health has already been compromised, and who may be seeking new disability accommodations;
- People who have lost loved ones and need comfort, support, and the knowledge that their workplaces and schools are working so that others don’t lose their loved ones too.

The ACAA strongly endorses requirements for vaccination and masking, with appropriate exceptions based on medical need. Failure to require vaccination and masking exacerbates existing inequalities, and creates new ones.

In 2020, campuses demonstrated that accommodations long treated as “possible” were perfectly workable. Even where vaccination and masking are required, campuses must still maintain a commitment to disability accommodation with as few barriers as possible. If they want to promote equity and safety, universities must not define remote teaching and learning as unreasonable accommodations.

How Institutions Should Respond to the Ongoing COVID-19 Pandemic

Commit to Supporting All Members of a Campus Community, Centering Marginalized Populations

The initial responses to the pandemic in 2020 were campus-wide, and in light of calls for racial justice in Summer 2020, often included a commitment to equity. Campus administrators can maintain these commitments by:

- Following or exceeding local public health recommendations for vaccination, masking, or other precautions;
- Incorporating accessibility practices such as remote access, captioning, and asynchronous formats into university-wide, year-round policies, with support for associated labor and costs incorporated into annual budgets;
- Providing financial and logistical support for contingent and part-time faculty, as well as university staff, recognizing that they may be the least able to request accommodation or other adjustments in work schedules.

Make Shifts in Faculty and Employee Accommodation Based on What We Have Learned

The 2020-2021 response to the initial pandemic redefined the essential functions of teaching and operations.

As campuses shift to greater in-person operations, we must not lose the benefits of practices such as:

- Streamlined HR processes for accommodation requests, such as accepting requests without the need for medical documentation;
- Recognizing the appropriateness of remote work as an accommodation for teaching and other academic work (i.e., resisting the idea that “teaching in person in a physical classroom” is an “essential function” in ADA parlance; acknowledging access barriers in masked communication);
- Recognizing the appropriateness of remote work for university staff;
- Designing accommodations policies that include household members’ health and caregiving responsibilities as the basis for adaptations such as remote work;
- Redefining “quality” in teaching interactions to include accessible, multi-modal means of teaching and sharing knowledge;
- Supporting faculty control over course formats;
- Providing additional mental health support for faculty and staff to help counter the stress and burnout from the past year;
- Adjusting expectations for scholarship and service based on the disproportionate impacts of the pandemic according to gender, race, disability, class, family status, and other differences.

Make Shifts in Student Accommodation Based on What We Have Learned

As with employees of universities, students have experienced changes in the definition of accommodation and the possibilities for learning. New formats can be embraced while also protecting the workload of faculty and staff by:

- Providing technical and pedagogical support for flexible and hybrid formats in every academic term to reduce the faculty workload involved in meeting student needs in cases of quarantine/isolation or illness;
- Allocating funds to purchase widely available and inexpensive tools to facilitate hybrid formats, rather than placing the costs on the shoulders of employees;
- Recognizing that new case waves and variants are likely to disrupt semester schedules by maintaining support for flexibility in attendance and assessment policies;
- Refusing pedagogy and assessment tools that replicate or create new forms of inaccessibility, such as intrusive proctoring or other surveillance software;
- Providing additional mental health support for students to help counter the stress and burnout from the past year.

Beyond “High-Risk”: Statement on Disability and Campus Re-openings

Accessible Campus Action Alliance

Published June 5, 2020

Updated July 10, 2020: [ACAA Statement on ICE Policy on International Students and Online Learning](#)

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The issues

As scholars of disability, health equity, institutional policy and inclusion; as disabled faculty who have spent careers negotiating legal and institutional processes of accommodation; and as allies committed to uplifting the safety of our disabled university community members, we call for universities to adopt explicit policies for safe, equitable, and inclusive online-centric teaching during the course of the COVID-19 pandemic.

In the spring 2020 semester, faculty across the world quickly adopted online teaching as an alternative to face-to-face teaching due to the COVID-19 pandemic. This shift to virtual modes of teaching and learning has enabled some forms of disability accommodation, such as remote participation in events and different timescales for activities, to become more mainstream practices. However, as universities consider re-opening to on-campus student participation in the fall, such options are once again becoming individually-oriented accommodations. This runs the risk of excluding disabled faculty, staff, and students from university activities, as well as placing all faculty, students, and staff in greater danger. Making online teaching the default, rather than the exception, would protect equity, health, and safety, while reducing the uncertainties regarding hybrid and in-person teaching in the fall. This more limited approach to campus re-opening would free space for students who do not have safe off-campus housing to maintain social distance, and would still allow for a limited number of classes or modules that require on-campus work.

Campus re-openings are an issue of civil rights, particularly disability, racial, and gender equity. Given the disproportionate representation of COVID-19 infection and death in Black and brown communities, university policies that emphasize in-person work and teaching run the risk of compounding the impact of racial inequity. These policies also risk endangering already-marginalized members of university communities, including staff and contingent faculty who are less likely to have the option to take time away from work. As a matter of justice, equity, and ethics, we call upon university administrators and communities to value the lives of marginalized racialized and disabled people over the purported economic value of campus re-openings.

An explicit and demonstrated commitment to care and accountability should shape all decisions regarding campus re-openings. Because there is no way to know how many faculty, students, staff (and the people they live with) are currently infected, are carriers, or are likely to become vulnerable, colleges and universities should approach the issue of accommodation with greater flexibility than has been typical in US institutions. Members of campus communities who are particularly vulnerable to the virus should not be treated as disposable or allowable collateral

damage in the course of the pandemic. A uniform policy of shifting courses online in the fall, with adequate time to prepare for online teaching and to make plans for exceptional activities that require face-to-face interaction, is necessary to proceed with care and equity. Furthermore, this approach is in line with directives from the [U.S. Department of Education](#), which is allowing for distance education through at least the end of 2020 in recognition of the pandemic crisis.

Beyond the “high-risk” framework for accommodations

We caution against approaches that provide exceptional and one-time accommodations only to those deemed “high-risk.”¹ Singling out “high risk” individuals ignores the larger public health issue that vulnerability is not exceptional to disabled people or those who fall into the CDC’s epidemiological categories.² All students, faculty, and staff are vulnerable to varying degrees and campus re-openings thus run significant risks to collective health.

Accommodation procedures for employees vary widely across different higher education institutions, but almost all of them rely on the ADA for determining accommodations, which presents several practical problems.

1. The CDC’s criteria for “high-risk” categories do not necessarily align with ADA-protected disabilities. Being at risk for COVID-19 complications may affect significant life activities, but even those at lower (supposed) risk (for example, faculty who are 64, not 65 years old) can face harmful health consequences from working on campus despite not being entitled to ADA protections. Additionally, it is impossible to prevent biases resulting from the disclosure of medical information, particularly when accessibility needs are disclosed to supervisors or administrators for the purpose of facilitating accommodations.³ This concern is especially acute for contingent faculty, who

¹ Some states and institutions are developing criteria to determine the highest-risk groups of people and their need for protection. For example, in New York State Matilda's Law states that people over 70 and with underlying conditions should not come out of quarantine.

² Although the CDC’s criteria for “high-risk” categories are based on emergent epidemiological data, they cannot predict the risk of debilitation or death from COVID-19 for every individual. Nor do these criteria consider the availability of ventilators, hospital beds, and medications in each locale.

³ A nationwide study of faculty with mental illnesses found that disclosure was a fraught issue for academic career advancement; most faculty are not served by an established ADA or Disability Services office, and thus cannot count on confidentiality. Margaret Price and Stephanie L. Kerschbaum, “Promoting Supportive Academic Environments for Faculty with Mental Illnesses: Resource Guide and Suggestions for Practice” (Temple University collaborative on

may fear that disclosing medical conditions will prevent their contracts from being renewed.

2. As [recognized by the Equal Employment Opportunity Commission's guidance on the ADA and COVID-19](#), existing procedures that require employees and students to submit medical documentation of underlying conditions may disadvantage those facing medical stigmas, barriers to accessing healthcare in a timely way, or potential discrimination if their conditions are reported to administrators. Many disabilities related to respiration, immune system, and allergies are not easily medically-documented. They may require years of diagnosis, and can be extremely expensive to document. [Research on healthcare disparities](#) shows that marginalized people (particularly people of color, disabled people, and poor people) are less likely to be believed or to have access to the types of healthcare necessary to provide such documentation. Furthermore, new conditions of risk may arise through institutional responses to the pandemic. The [CDC notes](#) that more frequent sanitation practices, such as the increased use of disinfectants, may trigger asthma, chemical sensitivities and allergies to cleaning agents. Even faculty with access to university-provided healthcare can face clinical biases. For example, doctors focusing on medical treatment may be [unwilling, overscheduled, or not equipped](#) to provide documentation that makes a case for accessibility. Thus, medical diagnosis is not an appropriate benchmark for providing accessibility.
3. The [ADA does not provide protection](#) for those concerned about putting immunocompromised or at-risk family members in danger.

To balance health outcomes with economics and practical considerations, we call for universities to commit to justice and care-driven concerns for health and to incentivize innovative and accessible approaches to learning. The uncertainty of the moment – when changes in infection rates may suddenly require changes in format, and when any student or employee may be required to self-isolate for 14+ days due to suspected exposure – also requires preventative planning. Principles of accessible and universal design recognize that measures taken in advance are preferable to last-minute measures that are often more expensive and less convenient to all parties. This approach avoids singling out disabled people as exceptions and instead recognizes the shared vulnerability and need for care in these unprecedented times.

Best Practices for Campus Re-Openings

Community Inclusion of Individuals with Psychiatric Disabilities, January 2017).
<http://tucollaborative.org/employment/>

1. University policies should prioritize the health of the campus community on the whole and take all steps to reduce virus transmission, even at economic cost. This means limiting assumptions about how many faculty are “healthy” or “safe” from contracting the virus and experiencing dire or life threatening complications.
 - a. Universities should recognize--and account for in policy and practice--the ways that systemic racism, sexism, ableism, and inequitable access to resources matter to employees’ risk categorization vis-a-vis COVID-19.
 - b. The most health and equity-centered approach is to allow online teaching with built-in accessibility for all faculty and students. Universities should announce plans as early as possible for adequate planning to occur. This approach, taken by the [California State University system and others](#), demonstrates the safest and most balanced solution to university education during the pandemic.
 - c. In the case of student needs that require on-campus presence, such as on-campus housing for vulnerable students and curricula that require facilities or in-person activities, a commitment to remote work should receive priority whenever possible. For example, hybrid classes can be taught in which all non-lab work is done online allowing for time and space for social distancing. Limiting other activities on campus will also reduce risk to those who must be present.
 - d. Universities should announce online-teaching policies as quickly as possible in order to allow adequate time for planning accessible online teaching content, such as captioning videos or requesting changes to classroom accommodations that are needed in an all-online environment.
2. Universities should consult affected faculty, staff and other stakeholders in crafting their COVID-19 responses. COVID is not an opportunity to change accommodation, accessibility, and other policies without the input of those who will be directly affected. Human Rights and other laws and protections are not suspended and cannot be ignored, nor can democratic governance procedures be subverted and inverted. During a pandemic, universities must consult with disabled faculty, staff, and students to take the most accountable and caring approaches to shared vulnerability.
3. Universities should not require disclosure of personal medical, financial, or familial information to the institution in order to receive access to remote participation in teaching and learning. There are many barriers to receiving medical disclosures, including physician bias, structural factors affecting access to health care, and the increased risks of visiting doctor’s offices for testing and verification during the pandemic.
 - a. Faculty and staff should be able to work remotely (or access paid sick leave) without penalty. This recommendation aligns with those of many organizations including the [National Association of Disabled Staff Networks](#). Universities that plan all-online semesters or years avoid singling out vulnerable individuals as exceptions. This can be a [justice-centered approach](#) when it explicitly commits to

allowing remote participation for all who request it, regardless of biomedical verification.

- b. Universities should provide clear protections to all faculty, staff, and students, regardless of medically-diagnosed condition. They should make clear that those who have conditions that are difficult to (or take years to) diagnose (such as many autoimmune diseases, chemical sensitivities and allergies, and chronic fatigue), those who are not able to access medical documentation due to barriers to health care, clinical bias and stigma, or a lack of available medical services will not be forced to work on campus.
 - c. Universities should make clear that faculty and staff with family members and domestic partners who are immunocompromised or otherwise at-risk will not be forced to work on campus.
 - d. Campuses should appoint qualified accessibility liaisons responsible for clear communication about accessibility procedures for students, faculty, and staff.
4. Digital and remote modes of instruction should be considered best practice in the context of the pandemic. They should be understood as a valuable and feasible mode of instruction given the current risks. To address any perceived gaps in the quality of education:
 - a. In the case of labs, studios, and courses that require face-to-face components, campuses should elect to either delay these offerings until a safer time, or to allow a limited number of faculty to petition to do this work on campus. In other words, on-campus teaching and research should be exceptional accommodations, not the norm. For classes and activities that are identified as necessary for in-person contact, universities should identify clear guidelines on safety (such as social distancing, mask wearing, etc), provision of personal protective equipment (PPE), and contingency plans for illness or quarantine among participants.
 - b. Universities should provide educational and financial resources toward innovative syllabus and course design to address any gaps between digital and classroom learning.
 - c. Teaching centers and technological support staff should explicitly support accessible teaching strategies such as those compiled in [this guide](#). Care should be taken to design effective online courses, for example by balancing synchronous and asynchronous participation opportunities, to provide access to students with learning and sensory disabilities.
 - d. Universities should adopt explicit and uniform policies for how to address participants in different time zones and places without reliable internet access.
5. Universities should provide a clear plan for faculty, students, and staff on what steps to take should they become ill and/or need to be in isolation.

- a. Plans should specify whether other faculty will be required to take over teaching. Any procedures for designating additional faculty teaching should be made transparent and take into account issues of equity and power within the university.
 - b. Plans should specify whom students should contact if they become ill, whether they will be penalized for a lack of contact, how policies regarding incompletes, pass/fail, and withdrawing without penalty will be enacted during the pandemic, and how student employment will be affected by periods of illness.
- 6. Universities should make an explicit commitment not to use financial crises to cut accessibility in pedagogy, counseling, digital supports, and other areas of work.
 - a. Disability support centers should make clear that student accommodations apply to remote teaching and provide revised letters as appropriate
 - b. All digital platforms must be accessible to screen readers and have quality captions. Universities should support accessibility in commonly-used platforms such as Zoom by providing live captioning and transcription services. Universities should be aware that Webex, a popular platform used by higher education institutions, remains inaccessible to blind and visually impaired users.
- 7. Universities should design effective marketing and communications campaigns to explain the value of online learning and a balanced approach to public health to students deciding whether to enroll in the fall.

Prioritizing Relations of Care

Treating vulnerability as a universal condition made worse by the pandemic, rather than an individual problem, offers clear directives for creating university policies informed by care, rather than fear of financial losses.

- 1. Determinations of access to campus should use care, rather than economic costs, as their primary mode of determination.
 - a. Priority should be given to students who need to live on campus because of vulnerabilities (and can do so with social distancing)
 - b. Only labs and activities that require on-campus presence and that can demonstrate a safety plan should receive priority.
- 2. Universities should foster cultures of collective care by encouraging faculty to re-think their approaches to the workload, absence policies, and participation policies, recognizing

that in-person and synchronous participation is not a safe or expectable norm during this crisis.

3. Universities should maintain and extend disability accessibility services to all students, faculty, and staff. They should make clear the procedures for accessing these services, including transcription and ASL, longer test times and grading periods, and flexible, asynchronous participation in meetings/courses.
4. Universities should adopt appropriate approaches to mental health on campus.
 - a. Universities should devote appropriate resources from licensed professionals toward the mental health care of students, faculty, and staff. The [American College Health Association](#) recommends expanded supports for mental health care as part of Student Health Services.
 - b. Universities should not call upon faculty to provide mental health resources for which they are not qualified or licensed. This includes suggestions to provide care during office hours.
5. Universities should adopt care in relation to faculty, staff, and student caretaking responsibilities:
 - a. For faculty, staff, and students whose caretaking responsibilities impact their teaching, research, and service, the university should establish clear guidelines for reduced work hours and service requirements.
 - b. Given the disproportionate impacts of the pandemic on faculty productivity for caregivers, particularly women, university policies must reflect enhanced funding direct to faculty for care work such as child care and home health aides.
 - c. Universities should respond to faculty concerns about their and their family's safety with generosity and sincerity, rather than disparage or discount their concerns.

Signed,

Accessible Campus Action Alliance

To sign this statement, email us at accesscampusalliance@gmail.com with your name and affiliation as you wish it to appear; or specify an anonymous listing.

Note: affiliation is for identification purposes only.

In support:

Executive Committee of the National Women's Studies Association

[American Anthropological Association](#) statement (directly using language from "Beyond High-Risk")

Society for Social Studies of Science

[University Film and Video Association](#)

Society for Medical Anthropology

Cal Poly Disability Faculty Staff Association, California Polytechnic State University

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