COVID-19 Best Practice Information: Considerations for People with Disabilities

Background

- This document provides guidance to state, local, tribal, and territorial (SLTT) governments on how best to ensure that people with disabilities have adequate access to goods and services during the coronavirus disease (COVID-19) pandemic.

- The Federal Emergency Management Agency (FEMA) continues to collaborate with federal agency partners and national disability stakeholder organizations to identify, monitor, and address concerns for people with disabilities as a result of the COVID-19 pandemic.

- FEMA has received extensive feedback regarding impacts on people with disabilities through a number of strategic engagements with SLTT partners, community disability stakeholders, other federal partners, and national-level organizations.

- The following is a list of key findings and considerations for jurisdictions and communities regarding ongoing COVID-19 pandemic operations across the country. These are best practices for consideration and do not constitute or should not be considered as guidance in any way.¹

Key Considerations

- For assistance accessing a FEMA program or service, please contact FEMA at 1-800-621-3362 (TTY:1-800-462-7585) or send an email to FEMA-CivilRightsOffice@fema.dhs.gov.

- The Centers for Disease Control and Prevention (CDC) reported that people with disabilities are not inherently at higher risk for becoming infected with or having severe illness from COVID-19 but may be at higher risk due to health disparities and limitations to access to critical public health programs and services.

  - The CDC has developed the following guidance specific to people with disabilities: Guidance for Direct Service Providers; Guidance for Group Homes for Individuals with Disabilities; Guidance for Direct Service Providers, Caregivers, Parents, and People with Developmental and Behavioral Disorders; People with Developmental and Behavioral Disorders

- The American Association of Health and Disability created a resource page on COVID-19 for people with disabilities. The page includes a video series, state policies, advocacy resources, and governmental resources.²

- People with disabilities have experienced disproportionate impacts as a result of COVID-19 due to limitations and/or disruptions to access critical programs and services such as healthcare (including COVID-19 testing and

¹ This document contains references and links to non-federal resources and organizations. This information is meant solely for informational purposes and is not intended to be an endorsement of any non-federal entity by FEMA, U.S. Department of Homeland Security, or the U.S. government.

treatment), transportation, employment, housing and sheltering, education, mental health and crisis counseling, technology, and communication.

- Nationwide, people with disabilities have experienced the following issues when accessing critical services:
  - Limited access to effective communication, facilities, transportation, and programs that allow for improved access to COVID-19 treatment, testing sites, and Alternate Care Sites (ACS).
  - Limited availability of personal protective equipment (PPE) for in-home care services to ensure patients can remain in their residence and to mitigate additional burdens on long-term care facilities.
  - Long-term, economic impacts for those who may have lost their jobs, are confronting new technology barriers, and have experienced service disruptions, to include issues regarding personal assistance services; food security; accessible transportation; access to medication, healthcare, durable medical equipment and support services; and access to technology.

- People with disabilities may experience challenges with social distancing measures given their reliance on community-based and in-home services.³

- People with disabilities must have equal access to information as those without disabilities, by providing effective communication access through the use of plain language and accessible videos that may include American Sign Language (ASL), captioning, voice over and audio description according the Rehab Act of 1973, Plain Language directive and 21st Century Communications and Video Accessibility Act (CVAA). Hiring of subject-matter experts who are able to work with staff to better understand the needs of aging populations and people with disabilities enhances accessibility and inclusion.⁴ ⁵ ⁶

**Lessons Learned Related to COVID-19 and People with Disabilities**

**FEMA Public Assistance**

- **Potential Best Practice:** FEMA’s Public Assistance (PA) grant can provide funding to eligible states and private non-profit entities to provide access and comply with disability rights laws if those costs are accrued during a Presidentially declared disaster. Additional information on FEMA’s PA program can be found here.

  - **Potential Best Practice:** SLTTs should consider providing auxiliary aids and services for people who are deaf or hard of hearing to access any COVID-19 related response activity. Those aids and services may be eligible for FEMA PA reimbursement.⁷

  - **Strength:** FEMA published a factsheet on the availability of FEMA PA funding to SLTTs to create and disseminate accessible health and safety information to the public.⁸


⁵ 2010 Plain Writing Act, [https://plainlanguage.gov/law/](https://plainlanguage.gov/law/)


Potential Best Practice: SLTTs can find additional guidance and best practices on FEMA’s website on how to provide services and access during the COVID-19 pandemic.9

Potential Best Practice: SLTT partners that experience disasters during this pandemic environment should consider ensuring access to personal assistance services for people with disabilities that require congregate and non-congregate sheltering. Personal assistance services may be eligible for reimbursement under FEMA PA program.10

Technology

Area for Improvement: In efforts to adhere to stay home orders, many individuals are shopping online to buy essential goods. People with disabilities may experience challenges navigating websites given that many eCommerce sites are not fully accessible.11

Mitigating Action: Businesses should refer to the Americans with Disabilities Act (ADA) Best Practices Toolkit to learn how existing website content aligns with accessibility regulations. Consider implementing website architecture that follows ADA guidelines.12

Mitigating Action: Websites and online resources should be accessible to people with disabilities. Section 508 Amendment to the Rehabilitation Act of 1973 requires federal agencies to make information technology access to people with disabilities. Non-federal agencies can also work to achieve 508 compliance.13

Potential Best Practice: In response to issues experienced by people with disabilities when accessing the internet, such as insufficient resources, Idaho disability stakeholder organizations created phone lines for people with disabilities in rural areas without internet access to call and request for food or assistance.14

Potential Best Practice: Colorado created an accessible Adobe Connect dashboard. Adobe Connect is a digital platform that allows for remote training, web conferencing, presenting and collaborating. People with accessibility needs may find information on optimizing the Adobe Connect experience here and here.15

Potential Best Practice: Although mobile applications may not be accessible to all people with disabilities, crowdsourced assistance mobile applications allow people who are blind or have low vision to shop without the help of store employees to identify products and read labels. Some smartphone apps can also read printed text aloud to identify products.16

9 2020 FEMA, Bringing Resources to State, Local, Tribal & Territorial Governments, https://www.fema.gov/coronavirus/governments
13 2020 FEMA, Office of Disability Integration interview
15 2020 FEMA, Office of Disability Integration interview
Potential Best Practice: SLTT governments should ensure websites with emergency-related information are accessible to people with disabilities, by using captioned videos and alternative tags for images to increase readability by those who use screen readers and other assistive technologies. See the Department of Justice’s guidance on technical assistance on accessible technology.¹⁷

COVID-19 Testing

Area for Improvement: People with disabilities may not be able to access COVID-19 testing sites which include, but are not limited to, community-based drive-through testing sites. Drive-through testing is especially inaccessible in urban areas, where fewer people have access to cars.

- **Mitigating Action:** The Union County, New Jersey Disability Core Advisory Group initiated a pilot “mobile” testing service which allows individuals with disabilities to be tested at home, when their disability prevents them from accessing fixed testing sites that are not universally accessible.

- **Mitigating Action:** The Northwest ADA Center developed a toolkit to help ensure accessibility at drive-through medical sites.¹⁸ The State of Colorado is considering people with disabilities before establishing a testing site by incorporating accessibility into their standard operating procedures.¹⁹

Potential Best Practice: Maryland Office of Deaf and Hard of Hearing (ODHH) provides anyone in the State of Maryland access to a sign language interpreter, captioning, and assistive listening devices. The ODHH created a video to inform Marylanders who are deaf or hard of hearing of testing site locations within the state. ODHH also has a resource page in ASL, which includes daily updates.²⁰

Potential Best Practice: National Association of the Deaf (NAD) provides video services with an interpreter sharing updates on COVID-19. NAD also worked with an interpreter agency in San Francisco to provide video remote interpreting services to anyone accessing a drive-through testing site.²¹

Potential Best Practice: A free testing site in Chicago reserves the first hour of testing for older adults and individuals with disabilities.²²

Potential Best Practice: In Colorado, a risk analysis was conducted to ensure testing sites are accessible and appropriately located.

Nursing Homes, Assisted Living, and Group Homes

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¹⁷ Department of Justice, Guidance to the State and Local Governments and Other Federally Assisted Recipients Engaged in Emergency Preparedness, Response, Mitigation, and Recovery Activities on Compliance with Title VI of the Civil Rights Act of 1964, [https://www.justice.gov/crt/tcs/EmergenciesGuidance](https://www.justice.gov/crt/tcs/EmergenciesGuidance)


¹⁹ 2020 FEMA, Office of Disability Integration interview


Area for Improvement: Instituting infectious disease prevention protocols is a challenge within nursing homes, assisted living centers, and group homes due to limited access to PPE and life-sustaining medical equipment, such as ventilators, which puts older adults, people with disabilities, and caregivers at risk.

Mitigating Action: The CDC has developed multiple guidance documents for nursing homes and other assisted living facilities that can be followed to ensure the safety of patients and staff.23

Area for Improvement: Residents of nursing homes and similar facilities are isolated from their families and support networks.24

Mitigating Action: While not accessible to all people with disabilities, technological solutions, such as video conference and phone calls, can be used to interact with loved ones while a in nursing home.

Area for Improvement: Individuals with disabilities scheduled to transition out of nursing homes or assisted care facilities may face barriers returning home due to limited staff and housing for in-home care.25 Group homes and day services for people with disabilities face similar challenges, but are not given the same support as programs that provide medical care.26

Mitigating Action: Find government and local disability programs and services, including healthcare resources, here.

Potential Best Practice: The State of Alaska developed and published guidance to support people with disabilities and their caregivers and family members that can be found here. Specifically, resources on the page address assisting people with disabilities and face coverings.27

Healthcare

Area for Improvement: With increasing medical demand and PPE supply shortages, people with disabilities reported inequities when being medically triaged for care.

Mitigating Action: As the PPE supply begins to increase nationwide, nursing homes should begin acquiring necessary PPE. Additionally, medical providers should ensure that people with disabilities are given care equal to those without a disability.28

Area for Improvement: Due to medical and safety concerns, some patients that received medical care in hospitals were not allowed to have family members or support providers accompany them.

Mitigating Action: While instituting necessary precautions and limiting visitation, medical facilities should consider allowing caregivers to accompany patients with disabilities to provide support and assist with communication.²⁹

Potential Best Practice: The Autism Services, Education, Resources, and Training Collaborative, a partnership of autism research and medical centers in Pennsylvania, released a short visual guide for individuals with autism about wearing masks to protect themselves and others from COVID-19. The guide is available in multiple languages.³⁰

Strength: Department of Health and Human Services (HHS) Office of Civil Rights issued a statement, Civil Rights, HIPAA, and the Coronavirus Disease 2019 (COVID-19), to ensure that entities covered by civil rights authorities understand their obligations under laws and regulations that prohibit discrimination on the basis of race, color, national origin, disability, age, sex, and exercise of conscience and religion in HHS-funded programs.

Strength: Similarly, FEMA’s Office of Equal Rights issued a civil rights bulletin, Ensuring Civil Rights During the COVID-19 Response, reminding FEMA, SLTT partners, and non-governmental relief and disaster organizations that civil rights laws and legal authorities, including those related to people with disabilities, remain in effect during emergencies and cannot be waived. The document also offers best practices and resources related to civil rights obligations, including disability.

Crisis Counseling Services

Area for Improvement: Reportedly one-third of Americans experienced high levels of psychological distress during the COVID-19 pandemic. For people with disabilities that limit communication, limited access to voice and text can hinder their ability to seek and get help.

Mitigating Action: Crisis counseling services can be delivered by phone, internet, social media, and other virtual means of communication, expanding accessibility for some with disabilities.³¹

Mitigating Action: Providers may be able to develop auxiliary aids and services for persons who are deaf or hard of hearing or who are blind or have low vision to ensure effective communication with persons who may have access and functional needs.³²

Potential Best Practice: SLTTs can leverage technical assistance provided by FEMA, in consultation with national disability stakeholder organizations and other federal partners, to find solutions to the current challenges faced by people with disabilities when accessing FEMA’s Crisis Counseling Assistance and Training Program (CCP) virtually.

²⁹ 2020 Baltimore Sun, Hospitals must allow Marylanders with disabilities to have caregivers accompany them, state officials say, http://www.baltimoresun.com/coronavirus/bs-md-coronavirus-marylanders-disabilities-hospital-20200515-vmqj7d6w8xoxax5k5xal.html
- **Potential Best Practice**: Crisis counseling providers should consider conducting training staff on disability topics related to accessible communication, disability etiquette and accommodations, and the disability support system.33

- **Strength**: FEMA announced its approval of 50 states and territories, including the District of Columbia, Guam, and Puerto Rico for its CCP program. CCP helps fund SLTT-provided crisis counseling services to residents struggling with stress and anxiety as a result of the COVID-19 pandemic.34

**Shelter Services**

- **Area for Improvement**: Concurrent emergency declarations for natural disasters, including tornadoes and flooding, during the COVID-19 pandemic created challenges for individuals with disabilities who required shelter services due to concerns of social distancing.
  - **Mitigating Action**: Shelter providers should consider coordinating with local disability service provider organizations to collaborate on how to ensure congregate and non-congregate sheltering are accessible to people with disabilities.35

- **Potential Best Practice**: HHS has developed an [ACS toolkit](https://asprtracie.hhs.gov/technical-resources/111/covid-19-alternate-care-site-resources/99) with accessibility considerations and guidance.36

**Information and Communications**

- **Area for Improvement**: Effective communication access, including ASL and Puerto Rican Sign Language (PRSL) interpreters and captioning live at press conferences, videos with ASL and/or PRSL interpretation, and live or remote visual services at community-based facilities, are not readily available to people with disabilities in all phases of the disaster lifecycle.
  - **Mitigating Action**: In Colorado, the Governor’s office, in collaboration with the Colorado Broadcaster’s Association worked to ensure that televised press conferences included qualified sign language interpreters, including Certified Deaf Interpreters (CDI).37
  - **Mitigating Action**: Numerous states including [Rhode Island](https://www.governor.ri.gov/), [Kentucky](https://www.ky.gov/), [Ohio](https://www.ohio.gov/), and [Illinois](https://www.governor.state.il.us/) are ensuring there is an ASL interpreter supporting the governors’ daily press briefings.38 Most state governors and some large urban area mayors are consistently providing a sign language interpreter and, if available, CDIs.39
• **Area for Improvement:** Some people with disabilities may not be able to use face masks due to health concerns, developmental disability, and/or accommodation. Additionally, face masks may limit access to communication for a person who is deaf or hard of hearing if the person’s primary mode of communication is lip reading.40

  □ **Mitigating Action:** The Deaf and Hard of Hearing (DHH) Mask Project has created an “accessible-deaf-friendly” mask project that provides a step-by-step guide on how to create a homemade cotton and clear plastic mask designed for the deaf and hard-of-hearing community. The plastic part of the mask that covers the face showcases the mouth, which allows deaf or hard-of-hearing individuals to read lips. Additional instructions can be found on [DHH Mask Project and Tutorial].41

  □ **Mitigating Action:** Similarly, The Missouri Commission on Deaf and Hard of Hearing, in partnership with the State Emergency Management Agency, Department and Health and Human Services and the Governor’s office are providing clear masks to Missourians for free. Residents of Missouri can go to [ASL Vlog] to find out how to get a clear mask.42

• **Potential Best Practice:** SLTT government agencies should consider conducting self-evaluations of emergency management programs to identify communication gaps that exist when providing emergency management information to individuals with disabilities. Based on these evaluations, they should develop a plan for providing inclusive and effective communication access.

  □ **Potential Best Practice:** FEMA’s Emergency Management Institute (EMI) offers a two-hour independent study course for SLTT emergency management programs to assist with including people with disabilities in disaster operations. The curriculum includes guidance on providing equal access for people with disabilities that are physical, programmatic, and may impact communication access.43

• **Potential Best Practice:** Partner with community-based organizations and social service providers to share messaging to the whole community, including individuals with disabilities, individuals with limited English proficiency, low-income populations, underserved communities, and diverse faith communities.44

• **Potential Best Practice:** Crisis counseling providers may utilize the Department of Homeland Security’s “I Speak” booklet to identify individuals with limited English proficiency.45

• **Potential Best Practice:** Medical students created a plain language illustrated guide on COVID-19 to help individuals with intellectual disabilities understand what COVID-19 is and what to do if a person is experiencing symptoms. Access a digital copy [here].46

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42 2020 Missouri Commission for the Deaf and Hard of Hearing, Clear Mask Announcement [https://www.youtube.com/watch?v=ukhPwBLrKzA&feature=youtu.be&fbclid=IwAR3hO699SQW77BeoHggODt1K2QsZ6pzVeEyRRE6dlaKZ1Nh4oJrtUQt5M](https://www.youtube.com/watch?v=ukhPwBLrKzA&feature=youtu.be&fbclid=IwAR3hO699SQW77BeoHggODt1K2QsZ6pzVeEyRRE6dlaKZ1Nh4oJrtUQt5M)


44 2020 FEMA, Office of Disability and Integration interview


Potential Best Practice: State agencies in partnership with Disability Advisory Groups provided information on COVID-19 for people with disabilities in 12 languages, including ASL. Examples and resources can be found here and here.47 48

Potential Best Practice: The New York State Department of Health developed a COVID-19 Symptom Check card for people who are deaf and hard of hearing.49

Potential Best Practice: SLTTs may commission a contract with organizations for qualified on-site and remote sign language interpreting services prior to a disaster to ensure access to effective communications during a disaster.50

Potential Best Practice: Provide step-by-step instructions about mobile or other testing sites through accessible public service announcements, noting the limitations of in-person auxiliary aids and services because of social distancing, and promote the use of video remote interpretation for individuals in need of sign language at testing sites.51

Strength: FEMA provided on-going support to SLTTs and other Federal Agencies to produce informational videos in ASL. These videos provide direct access to people who are deaf or hard of hearing who use sign language. These videos are also captioned.52

**Education and Employment**

Potential Best Practice: New York City has released resources on learning at home for students with disabilities, which include assistive technology support and specific occupational, physical, and speech therapy activities for students. 53

Potential Best Practice: Special education teachers have mailed lesson plan packets in braille to students’ homes and arranged the pick-up of braille writers from local schools at designated times to maintain social distancing.54

Potential Best Practice: Kent-Sussex Industries, Inc., a nonprofit organization, is providing vocational training, employment, supported employment, community integration, transportation, day habilitation, life enrichment, and nutritional services to individuals with disabilities via Zoom calls.55

Potential Best Practice: Disability: IN, a nonprofit for business disability inclusion, has compiled resources to support those working from home during COVID-19.56

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49 2020 FEMA, Office of Disability Integration interview
50 2020 FEMA, Office of Disability Integration interview
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Topics for the “Best Practices” series are generated from crowd sourced suggestions. Have an idea? Let us research it! Organizations and individuals can e-mail best practices or lessons learned to fema-cipsupport@fema.dhs.gov.