

Job Corps Updated COVID-19 Safety Protocols Frequently Asked Questions (FAQs) No. 3

In October 2021, Job Corps issued four new Program Information Notices (PINs) installing new COVID-19 safety protocols and allowing for the resumption of traditional enrollment under those protocols. Job Corps has received a number of questions about the implementation of these PINs in coordination with Job Corps' existing COVID-19 guidance and practices.

Most of these questions have concerned:

- **PIN 21-01:** Requiring centers to determine student COVID-19 vaccination status, and requiring students vaccinate or follow enhanced testing, masking, and quarantine requirements.
- **PIN 21-02:** Describing new testing, masking, and quarantine requirements for fully vaccinated students, partially vaccinated students, and unvaccinated students.

The below FAQs answer many—but not all—of the questions we have received from staff and students. As in previous stages of the pandemic, implementation of Job Corps' COVID-19 safety protocols is an ongoing process. COVID-19 has touched virtually every aspect of center operations, and our previous guidance was comprehensive. Job Corps is still gathering information about some of the activities described in earlier guidance to assess how to best ensure student and staff safety in light of current pandemic conditions. Job Corps welcomes additional questions and concerns from its students and staff as it considers additional FAQs and guidance to help centers implement these new protocols.

General questions about vaccination

Must centers collect vaccination status for distance-learning and virtually enrolled students?

Yes. While the COVID-19 safety protocols apply only to students on center, centers must determine the vaccination status of all students. Consistent with PIN 21-01, centers also should provide Job Corps or CDC information pertaining to vaccination.

Must new enrollees who have not yet arrived on center complete an Attachment C vaccination attestation form?

Yes, these students must complete this form after approval for enrollment but before arrival on center. The center cannot require vaccination before arrival, but the center must provide referrals for vaccination to students who are not fully vaccinated.

Must centers obtain Regional Office approval before bringing in an outside provider to administer vaccinations on center?

No, but centers should make the Regional Office aware of this activity. Centers must ensure these individuals comply with all COVID-19 safety protocols and all center rules. Additionally,

centers should limit the areas of center accessed by outside providers and provide clear instructions on which areas these providers may access and when.

Treatment of vaccinated students and unvaccinated students

Must all students continue to complete the daily symptom tracker?

Yes.

Must fully vaccinated students continue to socially distance?

Yes. However, we will continue to monitor the pandemic and advise on any changes to this policy.

What if unvaccinated in-person students decline to test according to PIN 21-02?

As noted in PIN 21-01, centers must discontinue these students from in-person learning and transition them to distance learning. If a residential student, this student must be returned to their home of record.

What duty status should centers record for students not participating in center activities because of vaccine side effects?

PIN 21-01 requires that centers not take punitive action against students missing center activities because of COVID-19 side effects. As noted in that PIN, student duty status for all absences due to vaccine side effects must be classified as “Administrative Leave with Pay.”

Do PIN 21-02’s quarantine requirements apply when a residential student moves from their original center to an Advanced Training center?

Yes. Residential fully vaccinated Advanced Training students do not need to quarantine upon arrival. Those who are not fully vaccinated must quarantine according to PIN 21-02.

Must students continue to mask in center or shared vehicles?

Yes.

Does the weekly surveillance testing of not fully vaccinated students and non-residential students have to occur on a particular day of the week?

No.

May center staff room students together based on shared vaccination status (i.e. all unvaccinated students room together)? What does a center do if a student requests a vaccinated or unvaccinated roommate?

No. Grouping unvaccinated students together increases the risk of outbreaks. The better practice is to mix vaccinated students with unvaccinated students. While a center is allowed to permit students to request room changes based on vaccination status, doing so may risk

disclosing confidential medical information. Students may voluntarily disclose their vaccination status to other students, but Job Corps center staff must not disclose individual students' vaccination status. Accordingly, a center may consider room change requests, but its decisions must not be based on a students' vaccination status.

May centers implement stricter COVID-19 safety protocols than outlined in the PINs (e.g. require quarantining for vaccinated students who had a close contact exposure)?

No. Centers must follow the COVID-19 safety protocols in PIN 21-02, which require vaccinated students to isolate only when they have COVID-19 symptoms.

May centers allow vaccinated students, but not unvaccinated students, to train through off-center Work-Based Learning (WBL)? Is the waiver process still in place?

Under existing policy, all students may train through WBL provided centers follow existing COVID-19 safety protocols. PINs 20-03 and 20-07 allow WBL with approval by a center's Regional Office. To arrange WBL, centers must complete a waiver request gathering information on the workplace.

PINS 21-01 and 21-02 did not repeal PINs 20-03 and 20-07, and centers still must submit waivers to Regional Offices prior to authorizing WBL. While created during an earlier point in the pandemic, the waiver process closely examines COVID-19 safety protocols of a WBL workplace, which allows Job Corps to assess the COVID-19 risk posed to students working at the site. Accordingly, the current WBL waiver approval process will remain in place at this time.

Must centers house residential WBL students separate from other students?

Job Corps has not required separate living arrangements for WBL students, but some centers chosen this approach in documenting how to minimize COVID-19 risks when requesting a WBL waiver. A driving reason for separate living arrangements was to avoid forcing WBL students into long quarantines.

Job Corps is not disallowing this option and centers may continue to propose it during the WBL waiver process. However, PIN 21-02 waives entrance and return quarantines for fully vaccinated students. Consistent with that policy, centers may propose allowing fully vaccinated students participating in WBL to live and move among the general student body, but housing not fully vaccinated students separate from the general student body. In proposing such an approach, centers must propose a valid COVID-19 safety reason for the different treatment of fully vaccinated students and not fully vaccinated students. All waiver requests will continue to be reviewed on a case-by-case basis.

Are centers allowed to issue personal time off to students?

Yes. After assessing potential safety risks, Job Corps has determined that centers may issue personal time off. For on-center students who are not vaccinated, partially vaccinated (according to current CDC guidance), or decline to answer on vaccination status, centers must

maintain students' quarantine for seven days following leave/PTO in accordance with PIN 21-02.

May centers plan recreational trips for residential students?

Yes. Job Corps has determined that centers may plan and allow these trips only for vaccinated students, since they have a lower risk of contracting on these trips and spreading COVID-19 on center. Previous limitations continue to apply for students who are not fully vaccinated. This is consistent with the elimination of return quarantines for asymptomatic fully vaccinated students in PIN 21-02.

May center staff ask students who are returning to the center if they have family members who have COVID-19 or any symptoms associated with COVID-19?

No. A center may ask students if they have been in close contact with anyone diagnosed with COVID-19 or who have symptoms of COVID-19. If the student says yes, center staff must follow PIN 21-02's protocols for the student's vaccination status. Centers must not ask questions about the health status or symptoms of family members or other individuals with whom the student has been in contact. The best practice is to only ask if the person has been in contact with a person who has COVID-19 symptoms or who has tested positive for COVID-19.

Under Job Corps' health protocols, students typically have not quarantined after a close-contact exposure if they tested positive for COVID-19 in the past 90 days, but are not symptomatic. Under the enhanced protocols in PIN 21-02, must students who are not fully vaccinated quarantine if they have a close-contact exposure with an individual who tested positive.

These students do not have to quarantine or test after close-contact exposure if they:

- Produce proof of a positive test within the past three months (or 90 days).
- This test is older than ten (10) days old.
- They do not show symptoms of COVID-19.

Must students with a confirmed and documented positive test for COVID in the past 90 days still quarantine at entry at a Job Corps center?

Entry quarantine and entry testing is waived for these students if they:

- Produce proof of a positive test within the past three months (or 90 days).
- This test is older than ten (10) days old.
- They do not show symptoms of COVID-19, to account for the CDC-recommended isolation period for infected individuals.

Must centers perform weekly surveillance testing on not fully vaccinated students who have a confirmed positive test for COVID-19 in the past 90 days but are not currently symptomatic?

No, the CDC does not recommend repeat testing within 90 days of a confirmed positive COVID-19 case in an asymptomatic person. These students may continue to test positive during this timeframe while not being infectious and have a reduced risk for repeat infection. Accordingly, if an asymptomatic student has proof of a positive (older than ten days) from the past three months, the student does not have to complete surveillance testing until 90 days after their positive test result. After 90 days, a student must begin surveillance testing.

Staff procedures

Did the new PINs change staff COVID-19 safety requirements?

No. Center staff must continue to adhere to all requirements in place prior to publication of the PINs, unless they conflict with federal staff requirements applicable to employees of Civilian Conservative Centers, which are operated by the U.S. Department of Agriculture. For contract staff, the Office of Special Procurement Executive (OSPE) will issue all future guidance on COVID-19. Until OSPE issues new guidance, centers must follow existing COVID-19 staff guidance.

Must vaccinated staff continue to quarantine away from the center if a close-contact exposure?

Yes. PINs 21-01 through 21-04 did not change Job Corps' rules for staff.

Reasonable accommodations

Can a student request a reasonable accommodation if a family member is particularly susceptible to COVID-19?

No. Centers, however, may provide job or classroom flexibilities in this instance, even if not required. If a center does provide a modification to its normal rules or policies, it should clearly document and explain to the student or faculty member that its action is entirely voluntary, the action is not taken under the authority of any disability law, and it is not a reasonable accommodation.

Forged vaccination cards and discipline

What if a student presents a fake vaccination card or signs a false attestation that they are vaccinated? Should that student be terminated?

At this time, these students should not be terminated consistent with PIN 20-12, which describes violations of COVID-19 safety protocols as a minor infraction not resulting in immediate termination. Job Corps is closely monitoring the incidence of forged vaccine cards

presented by students at our centers and other educational institutions and whether changes to Job Corps' discipline policy are needed to deter this behavior.

Should centers be looking for forged cards? What should they look for?

Yes. As stated in a previous FAQ, centers should examine vaccine cards for signs that they are false or invalid, including missing provider names, lot numbers, dosages administered off the recommended schedule for vaccine type, and incorrect or clearly manipulated government seals.

Why is offering a fraudulent/forged vaccination card not an offense resulting in termination from Job Corps? Isn't the use of forged vaccination cards illegal and unsafe?

Job Corps is very concerned about forged vaccination cards and their potential use by students. We will continue to monitor the situation and incidences of fraudulent vaccine records at our centers and other educational institutions to determine if changes are needed to Job Corps' discipline policy to deter this behavior.

However, at this time, the center should focus on reviewing vaccination records to minimize the risk of COVID-19 spread—not in determining a potential behavioral violation. Centers must take steps to ensure the authenticity of proof of vaccination, as properly determining vaccination status is critical to centers meeting Job Corps updated safety protocols.

PIN 21-01 advises that vaccination cards are only one method by which centers may verify vaccination status, and centers must exhaust all three methods prior to making a determination based on vaccination status, especially if it suspects or receives information that a card is a forgery. In such a situation, Job Corps recommends centers immediately seek to verify vaccination status through the Immunization Information System (IIS), a state-by-state system tracking immunizations. This [link](#) contains information on obtaining proper authorization from a student to access their records in the IIS. If a center cannot verify full vaccination through IIS or another method, the student must follow PIN 21-02's enhanced masking, testing, and quarantine requirements.

Before students provide proof of vaccination, centers should advise students, enrollees, and applicants that producing or using fake vaccination cards is illegal. Centers also should make a center-wide announcement to all students that producing or using fake vaccination cards is illegal. The FBI has warned about the illegal sale or forgery of COVID-19 vaccination cards. That includes buying and using fake vaccination cards, making one's own vaccination cards, or filling in blank vaccination cards with false information. The FBI notes that the creation, purchase or sale of vaccine cards by individuals is illegal and endangers public safety. Moreover, unauthorized use of the CDC seal is a crime that may be punishable under federal criminal law.