PIN 21-12 Frequently Asked Questions

1) Do the changes in PIN 21-12 apply to staff?

No, PIN 21-12 provides guidance for students. Job Corps center staff, contractors, visitors, and vendors are required to follow Guidance 2021-05 Revision #4 issued by Job Corps Acquisition Services (JCAS) on March 21, 2022. This guidance is consistent with CDC, Safer Federal Workforce Task Force, and DOL COVID-19 Workplace Safety Plan guidance for masking and testing. Job Corps center staff, contractors, visitors, and vendors should continue to follow JCAS Guidance 2021-05 Revision #3 regarding when these individuals will be asked to provide information about their vaccination status.

To ensure understanding, Job Corps center staff and sub-contractors <u>do not</u> need to complete a daily written health attestation. Pursuant to DOL's COVID-19 Workplace Safety Plan, contractor employees (i.e., Job Corps center staff and sub-contractors) are required to conduct a health screening at home each day prior to traveling to their worksite. Employees should take their temperature and <u>answer a series of questions</u> based on current CDC guidelines on COVID-19 and their vaccination status.

On the topic of screening testing, it is required for federal worksites located in areas with medium or high COVID-19 Community Levels. If an area moves from a low COVID-19 Community Level back up to a medium (or high) Community Level, testing begins or resumes the following week, and not fully vaccinated employees will need to take a test within the 3 days prior to coming into the workplace for that first week in the higher community level. The employee will then reestablish a weekly testing schedule as long as the area remains at a medium or high community level. Not fully vaccinated employees who have not yet started screening testing must follow this procedure in their first week of reporting to work in an area of medium or high Community Level.

2) Are centers still required to complete a CA-1 for every confirmed student COVID-19 case?

Yes. Job Corps enrollees are deemed to be civil employees of the United States for the purpose of the Federal Employees' Compensation Act (FECA). FECA provides coverage for work related injuries, including COVID-19. If a Job Corps students test positive for SARS-CoV-2 and requires medical treatment, then a CA-1 needs to be filed. Centers should assist students in filing CA-1 forms. For further information, see

https://www.dol.gov/agencies/owcp/dfec/coronavirusfaqs

Further, under OSHA's recordkeeping requirements, if an *employee* tests positive for SARS-CoV-2 infection, the case must be recorded on the OSHA Illness and Injury Log if each of the following conditions are met: (1) the case is a confirmed case of COVID-19; (2) the case is work-related (as defined by 29 CFR 1904.5); and (3) the case involves one or more relevant recording criteria (set forth in 29 CFR 1904.7) (e.g., medical treatment beyond first aid, days

away from work). Employers should also follow state and local reporting requirements and comply with state and local contact tracing efforts. (Testing | Safer Federal Workforce).

3) Are centers still required to send a letter notifying staff and students of COVID-19 cases on center?

Yes. PIN 21-12 does not rescind Information Notice 20-02. Per Information Notice 20-02, centers must send a COVID-19 Notification Letter to all staff and on-campus students (or parents/guardians for minor students) informing them of the positive test while ensuring all PII is kept confidential. Cases may be combined into one notification letter that is sent weekly.

4) Are daily health checks required for all enrolled students or only students who are present for duty on center?

Daily health checks are only required for students who are physically present at the center or another training provider's location. This includes all residential students and non-residential students.

5) Are centers required to record individual responses to the daily health check questions?

No. Centers must have a system in place to ensure that on a daily basis all students complete virtual or in-person health checks.

6) Is there still a 4-person maximum capacity to dormitory rooms?

There is no policy limiting the number of students that can be housed together. Centers should take into account vaccination status and student input, and consider that roommates will be considered close contacts if a student in the room contracts COVID-19.

7) How are centers to monitor and enforce required mask-wearing by students who have had a close contact exposure or a confirmed case of COVID-19?

Center must advise and document counseling a student regarding the individual requirement to mask when they are identified as a close contact exposure or confirmed COVID-19 case. If a student is unable to wear a mask, they must quarantine or isolate for 10 days. Center should develop a system to ensure compliance with individual mask wearing while protecting individual confidentiality.

As a reminder, centers must continue to follow existing program policies on providing reasonable accommodations for individuals unable to comply with COVID-19 policy requirements due to disability and/or religious belief, practice, or observance. They must also ensure that any individuals seeking exemptions from COVID-19 safety requirements due to pregnancy, childbirth, or related medical conditions, including childbearing capacity, are not discriminated against compared to others similar in their ability or inability to work or participate in Job Corps. Thus, to the extent that reasonable accommodations or modifications are provided for other similarly situated students or staff members, a pregnant student or staff member may also be entitled to accommodation or modification.

8) With the changes to physical/social distancing requirements, can students now do activities that place them within 6-feet of each other, such as playing contact sports and styling each other's hair?

Yes, 6-foot distancing is not mandatory and thus may opt to participate in elective activities that do not allow for 6-foot distancing.

9) Must centers obtain guardian permission for a minor <u>to not</u> maintain 6-foot distancing from students and staff on center?

No. Guardians of minors should be made aware in writing that Job Corps' COVID-19 physical/social distancing requirements align with the CDC guidance, that guardians should discuss concerns with the minor, and that the center is not required to enforce distancing for minors. Students who are up-to-date vaccinated have the option to distance and students who are not up-to-date are strongly recommended to distance. Job Corps centers provide the opportunity for students to follow this guidance but gives students the autonomy to decide.

10) Are results from antigen tests required to be entered into the student health record?

Yes. All positive and negative COVID-19 antigen tests are required to be entered into the Student Health Record, kept securely and confidentially, and reported as per Abbott ID Now test results. New MCI codes have been developed for the antigen test reporting.

11) Are centers still required to maintain one-way foot traffic and room capacity signage?

Yes, because centers are still required to create an environment that supports physical distancing for students who choose to distance.

12) Are temperature checks still required prior to entry?

No, however, centers are required to have a system in place that ensures students have a daily health check including being asked if they have symptoms of COVID-19, a recent close contact exposure, or pending COVID-19 test results.

13) Are visitors and community partners allowed on-center at this time?

Yes, centers should follow the Safer Federal Workforce guidance when managing visitors and community partners on center.

14) Do the PIN 21-12 changes allow single parents to return to center and allow for the opening of center daycares?

No, PIN 21-12 does not address the management or operation of Day Care or Child Development Centers on Job Corps campuses. The operation of Day Care or Child Development Centers will be addressed in a separate guidance document.

15) Does the student antigen testing need to be performed by a Health & Wellness staffer?

Students can be trained to self-administer antigen tests. However, a licensed Health and Wellness staff person must supervise testing and read results. All antigen test results must be recorded in

the student health record and the LIS portal. Supervision by Health & Wellness may be done virtually, as allowed by state regulations.