

#### Introduction

America's public schools, colleges, universities and Job Corps will face these same challenges. Job Corps plans to return students to its 121 contract and Forest Service operated centers and will begin to resume physical operations as centers become prepared to safely and adequately return, house, educate, train, and support students.

The Job Corps Center Resumption of Physical Center Operations Checklist for COVID-19 (Plan Checklist), incorporated into Program Instruction Notice (PIN) 20-08, sets the standards and expectations for resuming on-campus operations. The Plan Checklist, developed by Job Corps, reflects the advice and recommendations of the Centers for Disease Control and Prevention (CDC), Occupational Safety and Health Administration (OSHA), and Humanitas (Job Corps medical consultant). The Plan Checklist also reflects the input and feedback of Job Corps stakeholders over the course of several months.

Job Corps' *Plan Checklist* covers the key areas of center operations and creates specific requirements that must be executed within each area to reasonably ensure student and staff health on-campus before the center can be considered for resuming on-campus operations. The *Plan Checklist* requires centers to have Job Corps-approved *Resumption of Physical Center Operations Plans* (*Center Plans*) to be eligible to resume on-campus operations. Centers, when developing their *Center Plan*, must address how they meet and fully implement the tasks, requirements, and actions in the *Plan Checklist*. For example, the *Center Plans* must consider the needs of students with disabilities. A student need not have had an accommodation before COVID-19 to request an accommodation upon returning to campus. Students with disabilities returning to campus may require reasonable accommodation in areas such as the wearing of face coverings, the use of off-campus passes, testing, and scheduling when or if they can return to the campus based on health issues that may make them susceptible to the virus or to serious complications associated with the virus.

Job Corps centers should also anticipate some students may request alternative housing arrangements (*i.e.*, the ability to stay in a private room or a different housing arrangement) as an accommodation. Job Corps expects centers will ensure that students are aware of the process for requesting an accommodation, that the process is interactive, and that the centers' staff are trained to evaluate and provide accommodations related to COVID-19 health precautions.

In addition to the required *Center Plan*, centers must provide their target dates for resuming oncampus operations, the number of cohorts, and students in each cohort it expects to onboard for each center. The cohort number and size must reflect each center's actual onboard strength at

<sup>&</sup>lt;sup>1</sup> Considerations for Institutes of Higher Education (Updated May 30, 2020), <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#operations">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#operations</a>; CDC Activities and Initiatives Supporting the COVID-19 Response and the President's Plan for Opening America Up Again, INTERIM GUIDANCE FOR SCHOOLS AND DAY CAMPS (May 20, 2020), pp. 45-48, <a href="https://www.cdc.gov/coronavirus/2019-ncov/downloads/php/CDC-Activities-Initiatives-for-COVID-19-Response.pdf#page=45">https://www.cdc.gov/coronavirus/2019-ncov/downloads/php/CDC-Activities-Initiatives-for-COVID-19-Response.pdf#page=45</a> (last accessed September 23, 2020).

<sup>&</sup>lt;sup>2</sup> Guidance on Preparing Workplaces for COVID-19, <a href="https://www.osha.gov/Publications/OSHA3990.pdf">https://www.osha.gov/Publications/OSHA3990.pdf</a> (last accessed September 23, 2020).

the time the plan was developed. As a part of each center's plan, the Job Corps center must provide a proposed budget specific to the tasks, requirements and actions needed to resume operations. The budget must include any modifications to staffing levels and/or hours, the type and quantities of items needed to prepare the center, the estimated per unit cost of items, and the total estimated cost based on planned quantities of each item. In its center budget, the center must identify the specific requirements and/or actions it expects will increase the costs of center operation (less any savings) and for which they request additional funding.

Each center must also submit a written memorandum to the regional Contracting Officer's Representative (COR), signed by a corporate vice president or someone with an equivalent level of responsibility for center operations, certifying that the actions below have all been implemented before the center will be approved to begin returning students.

- The center fully implemented its approved *Center Plan*.
- The center's preparations followed current CDC guidance.
- The center consulted with Humanitas on the state of its medical and dental health readiness and no issues or concerns were identified.
- The center coordinated with state and local public health officials and no barriers exist to resuming operations as planned.
- The center coordinated with local medical facilities (*i.e.* hospitals, Urgent Care clinics) to ensure any potential COVID-19 medical needs of the students will be met.

The regional directors are central to ensuring that *Center Plans* are promptly reviewed by the CORs, that there is consistency in the review process, and that reviews involving similar facts will result in similar outcomes. Job Corps CORs will review submitted *Center Plans* and other information. As a part of reviewing *Center Plans* and budgets, CORs must consult with medical experts and may consult with other identified personnel, as appropriate, on the sufficiency of *Center Plans*, communicate the decision to reject or approve plans to centers, keep a tracking log on the disposition of plans submitted by centers, monitor compliance, and support modifications of contracts by the Contracting Officer (CO) that allow centers to spend funds and take other actions needed to resume on campus operations.

In some instances, CORs and/or the national office may schedule a site visit to a center prior to the center resuming on-campus operations. The selection of a center for such a visit may be based on information provided by the national office or factors known by the region that make it necessary to confirm that all required preparations described in the center's plan have been taken. The regional directors must provide written notice of regional site visits to the national office and provide the results of these site visits in writing within three workdays. While Job Corps does not currently anticipate conducting 121 site visits it may later determine that visiting all Job Corps centers is prudent based on emerging facts or circumstances.

Job Corps' national office will select the centers that are allowed to resume on-campus operations. This selection will be based on the existence of an approved *Center Plan* and budget, the written memorandum signed by a corporate vice president or equivalent responsible for center operations verifying center readiness and fully implementation of the *Center Plan*, center size, center location, transportation considerations, infection and death rates in the state or local

jurisdiction where the center is located, and, if applicable, the results of any site visits conducted by the Job Corps regional offices. Job Corps' national office will consider these and other risk factors relevant to assessing the risk associated with returning students to campus. These risk factors include, for example:

- the availability of COVID-19 testing supplies,
- the availability of cleaning and disinfecting supplies,
- the availability of personal protective equipment (PPE),
- the availability of hygiene supplies (e.g., tissue, liquid or foam soap, and hand sanitizer),
- the occupancy rate of rooms set aside for quarantine and isolation of students,
- the commuting radius of center staff,
- center staffing level and/or the numbers of on-campus employee COVID cases.
- the number of student and staff positive tests during the phased resumption of operations,
- the number of new confirmed symptomatic student and staff cases, and
- local hospital admission rates.

Job Corps' national office will establish a national resumption of operations schedule based on receiving the approved *Center Plans* from the regional offices, considering when each center believes it can resume operations, and the national office's determination of each individual center's risk level. The national schedule will be continuously monitored and revised based on any change in circumstances that creates an unacceptable level of risk. The regional offices, based on a communication from the national office, will notify centers when they are allowed to resume operations. As Job Corps monitors center operations, adjustments to on-campus operations may also be made. Regional Job Corps offices cannot authorize a center to begin returning students to campus. This authority lies with the national office; however, regional directors can provide input when the national office makes these decisions.

Many centers have already prepared plans and submitted them to the regional offices. Job Corps centers must submit center *Resumption of Physical Center Operations Plans* and other information no later than one week after the publication of PIN 20-08. Job Corps CORs will review these items. The CORs must approve or reject each center plan no later than 7 calendar days *following* the plan submission deadline. Approval of the center's plan by the regional office means Job Corps determined the plan is technically sound based on how it addresses and implements the tasks, actions and requirements in the *Plan Checklist* and meets the program's health safety needs. As described above, Job Corps' national office will establish a national resumption of operations schedule for centers with approved *Center Plans* and acceptable levels of risks for resuming on-campus operations.

The regional review of the budget is to ensure the proposed costs are generally in line with other cost estimates reviewed in the region and other information. The COs in the Office of the Assistant Secretary for Administration and Management (OASAM) will review the *Center Plan* and budget from the contracting perspective and are responsible for executing the final contract modification. Job Corps centers do not have approval to proceed with contract changes until the CO provides express approval and the modification is completed.

Following CDC guidelines on social (physical) distancing, proactively planning to protect student health upon their return to campus, and reviewing and revising existing pandemic/COVID-19 plans are essential components of center planning. The need for sound guidance to protect the health of Job Corps students is highlighted by CDC information classifying as "Highest Risk" full sized, in-person classes, activities, and events where students are not spaced apart, share classroom materials or supplies, and mix between classes and activities. <sup>3</sup> The tasks, requirements and actions in this *Plan Checklist* are the backbone of a sound *Center Plan* for resuming operations and a communications strategy that will go a long way toward addressing student and staff concerns. <sup>4</sup>

Questions about this *Plan Checklist* should be directed to the appropriate regional director or designated regional staff member.

#### **Area: Administrative**

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Task	Plan Requirements and Actions	
Contact with Local Jurisdictions	Establish and maintain communication with local and state authorities to determine current mitigation levels and COVID-19 risks in the center's area.	
Social Distancing Plan	<ul> <li>Establish written guidelines explaining the requirements below:</li> <li>Face coverings are required in offices and shared work areas.</li> <li>No handshakes, hugs, and/or touching is allowed.</li> <li>The use of shared items (e.g. pens for signing logs) should be limited. These items must be regularly sanitized according to an established schedule.</li> <li>Keep personal belongings separate from those of others.</li> <li>Follow CDC COVID-19 guidelines. See Social Distancing: Keep a Safe Distance to Slow the Spread, at <a href="https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html">https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html</a> (last accessed September 8, 2020).</li> </ul>	
Center Culture	Develop and provide staff training on center safety protocols, including physical distancing, consistent with CDC guidelines.  Develop and provide a structured student orientation program and/or class for returning students.  • Create a plan for how the student orientation will follow CDC guidelines for reducing the risk of transmission. Virtual orientation has the least risk. However, if virtual is not possible, the plan must ensure that students are 6 feet apart, wearing masks, and that the orientation takes place in a well-ventilated space, etc.)	

<sup>&</sup>lt;sup>3</sup>Considerations for K-12 Schools: Readiness and Planning Tool, <a href="https://www.cdc.gov/coronavirus/2019-ncov/downloads/community/School-Admin-K12-readiness-and-planning-tool.pdf">https://www.cdc.gov/coronavirus/2019-ncov/downloads/community/School-Admin-K12-readiness-and-planning-tool.pdf</a> (last accessed September 8, 2020).

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<sup>&</sup>lt;sup>4</sup> References in this document to "staff" should be read to include staff and instructors (both classroom and skilled trade instructors).

Task	Plan Requirements and Actions
	Develop and distribute information to reinforce the importance of proper hand washing, how to cover coughs and sneezes, and the proper use, removal and cleaning of face coverings. <i>See</i> Protect Yourself, at <a href="https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html">https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html</a> (last accessed September 8, 2020).
	Develop a student return plan that identifies how the center will gradually return all students using a phased in approach and prioritizes:
	<ul> <li>Students who are in high-risk environments and safety concerns exist.</li> <li>Students who reside closest to the center.</li> <li>Students closest to finishing the program (75% percent CTT complete with HSD/HSE or CTT complete and</li> </ul>
	<ul> <li>HSD/HSE pending).</li> <li>Students who have the most need for hands-on training (may have completed academic and HSE/HSD requirements).</li> <li>Students struggling with distance learning who may be at</li> </ul>
	risk of leaving the program.  • Students in leadership positions.
	Students that are non-residential.
	Return long-distance students in a later phase of resuming physical operations.
	Return students to campus in groups. The size of each group is based on physical distancing, transportation availability and vehicle occupancy guidelines, and other center specific conditions. The number and size of each returning group is center-specific. The number of groups and number of students in each returning group must be set out in the center's plan.
	Distance learning must continue for students who have not been returned to campus.  • Describe how the center will appropriately deliver academic learning and skills training to both groups of students.
Center Pandemic Plan	Review and revise, as needed, the center's pandemic plan to incorporate current CDC and DOL/OSHA guidance, and have an established response to a COVID-19 outbreak that requires ceasing center operations and existing and/or new student enrollee arrivals, and responding to an increase in individuals with reported COVID-19 symptoms and positive tests that may occur in the local and/or surrounding community.
Community Partners (e.g., MOUs, WBL, community service,	Inform community partners of the center's operational status.  Suspend partnership activity until the center can establish that
elected officials)	adequate health and safety protocols are in place to ensure student

Task	Plan Requirements and Actions
	Develop a process for submitting written partnership activity requests that include how student health and safety is protected to Job Corps' regional office for approval.
Leave/Weekend Passes	Suspend all weekend passes and off-campus leave until notified by Job Corps that the suspension is lifted.  • The expected maximum period for suspending passes is 90 days. The appropriate number of days is determined by each center in light of health and safety concerns, state and local health conditions and recommendations, and the impact of suspension on center culture.  • Create a process for receiving and processing special off-campus leave and weekend pass requests.  • Centers must ensure reasonable accommodation of students with disabilities that need medical treatment off-campus.
Student Pay	Minimize contact during the process for issuing student pay/allowances.  • Implement an electronic funds transfer (EFT) system for all student pay and allowances.  • Ensure students have debit cards for receiving student pay and student incentives, and for use at student stores and vending machines.

**Area: Facilities Management** 

Task	Plan Requirements and Actions
Facility Usage and Reconfiguration <sup>5</sup>	Ensure that changes in the use and/or configuration of the facility are consistent with physical accessibility requirements for students with disabilities.
	Ensure that the facility supports physical distancing of at least 6 feet, or as otherwise required or recommended by CDC.
	Determine the appropriate use, configuration and occupancy limitations (based on square footage) for all spaces on campus.
	Close locations within centers that are not needed or that cannot accommodate physical distancing guidelines.

<sup>&</sup>lt;sup>5</sup> While Job Corps owns the majority of its center locations, some centers are operated in leased facilities. In a leased facility, the lease must be reviewed to determine the obligations of the lessor and lessee. Centers operated in these facilities are required to implement the actions described in this document to ensure the health of the students in the Job Corps program. The center must notify the appropriate Job Corps regional director if alterations to a facility leased by DOL are needed. The regional director will coordinate with the Job Corps National Office and the Department of Labor's OASAM.

A number of centers are operated on federal property owned by the USDA Forest Service or the Department of the Interior. The requirements of the *Plan Checklist* apply to these centers.

Task	Plan Requirements and Actions
	<ul> <li>Install physical barriers, such as sneeze guards and partitions, particularly in areas where it is difficult for individuals to remain at least 6 feet apart.</li> <li>Remove excess furniture in all spaces on-campus to ensure social distancing guidelines.</li> <li>Post occupancy limits.</li> <li>Provide signage on floors, doors, etc. indicating social distancing guidelines.</li> </ul>
Cleaning and Disinfecting Plan	Require cleaning and disinfecting of the entire facility consistent with OSHA and CDC guidance.
	<ul> <li>Routine cleaning of areas unoccupied for seven or more days is needed. Maintain existing cleaning practices for outdoor areas. See Guidance for Cleaning and Disinfecting, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/cleaning-disinfecting-decision-tool.html">https://www.cdc.gov/coronavirus/2019-ncov/community/cleaning-disinfecting-decision-tool.html</a> (last accessed September 8, 2020).</li> <li>Develop and document schedules for daily and hourly cleaning and disinfecting.</li> <li>Adjust staffing levels and/or schedules to execute cleaning requirements and schedules.</li> <li>Ensure CDC guidance is followed for "high contact areas" by requiring that these surfaces be frequently cleaned and disinfected by regularly wiping down these surfaces. Door handles, sink handles, grab bars, hand railings, bathroom stalls, and dining hall tables should be cleaned and disinfected at least daily or between uses, as much as possible. Shared equipment, tools, computer equipment, desks should be limited when possible, or cleaned between use.</li> <li>Consult EPA's list of disinfectants for use against COVID-19, specifically for use on hard, non-porous surfaces and for your specific application need. More frequent cleaning and disinfection of these surfaces throughout the day is necessary to reduce exposure.</li> <li>Soft and porous materials like carpet, rugs, or material in seating areas should be cleaned or laundered, as appropriate. Disinfect these materials if appropriate products are available.</li> </ul>
Disinfecting Procedures	Disinfect using an EPA-approved disinfectant.  • If an EPA-approved disinfectant is unavailable, use 1/3 cup of bleach added to 1 gallon of water, or 70% alcohol solutions to disinfect. Bleach solutions will be effective for disinfection up to 24 hours. See Disinfecting Your Facility, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html">https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html</a> (last accessed September 8, 2020).  • Avoid mixing chemicals.  • Label diluted cleaning solutions.

Task	Plan Requirements and Actions
	Establish several cleaning and/or disinfecting stations in common areas in all buildings.
	Establish sanitation kits for all classrooms.
Disinfecting Spray Machines	Install automatic machine sprays in classrooms, residential common areas, high traffic areas, etc. (recommended but not required).
Bathrooms	Provide adequate supplies, including soap, hand sanitizer containing at least 60 percent alcohol (when supplies are available), paper towels, tissues, and disinfectant wipes.
	Replace trashcans with lids, when feasible, with no-touch/foot pedal trashcans.
	<ul> <li>Establish cleaning, disinfecting, and restocking schedules.</li> <li>Schedules must be written and maintained.</li> <li>Identify who completed the scheduled cleaning and/or restocking, and when the work was completed on a written log.</li> <li>Use personal pens to update the logs to minimize the risk of transmitting the virus through shared items.</li> </ul>
Water Fountains	Encourage staff and students to bring their own water to minimize using and touching of water fountains.
	Eliminate common or public water fountains.     Replace common water fountains with sensor water stations.     Provide students access to refillable water bottles and/or provide bottled water throughout campus.
	Regularly clean and disinfect water fountains according to a schedule, if public water fountains cannot be eliminated.  • Inspect fountains that have been shut down since March 2020, or a prolonged period, for safety before they are used.  • Flush and inspect water systems, if they have been completely offline, to ensure that they are safe to use.  See Reopening Buildings After Shutdown: Ensure the safety of your occupants and building water system and devices, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/php/building-water-system.html">https://www.cdc.gov/coronavirus/2019-ncov/php/building-water-system.html</a> (last accessed September 8, 2020).
High Traffic Buildings	<ul> <li>Regulate traffic patterns to support maintaining physical distance.</li> <li>Evaluate traffic patterns.</li> <li>Use signage to create "one way routes" and otherwise identify traffic directions and/or patterns.</li> <li>Create traffic flow (in/out) doors in high traffic areas (e.g., recreational areas, cafeterias, health and wellness</li> </ul>

Task	Plan Requirements and Actions
	<ul> <li>units), where possible.</li> <li>Provide physical guides, such as tape or decals on floors or sidewalks and signs on walls, to ensure that students and staff remain at least 6 feet apart.</li> </ul>
High Touch and/or High Risk Areas	Clean and disinfect high touch and high-risk areas at least daily or between uses, as much as possible.
	Use of shared equipment, tools, computer equipment, and desks should be limited when possible, or cleaned between uses.
Review Walkways and Access and Egress Plans	Use directional signage with arrow markings to indicate access and egress to walkways, and to specific entrances to enforce social distances.
	Use signage, where possible, to establish one-way in and one-way out for buildings and campus walkways.
Access Control	Control access to the campus to minimize the risk of introducing health hazards.  • Establish guidelines for visitor access that include screening for temperature and COVID-19 symptoms.  • Place signage at entry points describing the screening process and/or requirements (e.g., taking temperatures using a no-touch method, and using COVID related health screening questions)
	Require individuals to sanitize their hands immediately after entering a building.
	Require visitors to wear face coverings.
	Prohibit the general public from using center restrooms.
Laundry Rooms and Laundry Services	Develop a laundry schedule (automated, if possible) to ensure capacity in these facilities do not exceed what social distancing allows.
	Ensure that laundry equipment is functioning properly.
	Maintain access and adequate supplies to laundry facilities to help prevent spread of infection.
	Provide disposable gloves, soap for washing hands, and household cleaners and EPA-registered disinfectants to clean and disinfect buttons, knobs, and handles of laundry machines, laundry baskets, and shared laundry items.
	Post guidelines for doing laundry such as washing instructions and handling of dirty laundry.
	Use a laundry service to clean towels, mop heads, floor mats, etc.,

Task	Plan Requirements and Actions
	when possible.
HVAC Maintenance	Inspect HVAC filters, complete preventative maintenance, and create a schedule for frequent cleaning and filter changes.
	Increase circulation of outdoor air as much as possible, for example by opening windows and doors. Do not open windows and doors if doing so poses a safety or health risk (e.g., risk of falling, triggering asthma symptoms) to students, faculty, or staff using the facility. See Considerations for Institutes of Higher Education, Maintaining Healthy Environments, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#environments">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#environments</a> (last accessed September 8, 2020).
Use of Tents Where Lines Occur	Install tenting for inclement weather conditions to accommodate lines that form outside to ensure social distancing (recommended but not required).

### **Area: Health Services**

Task Area	Plan Requirements and Actions
Alternate Health and Wellness Area	Establish an alternate Health and Wellness triage area on campus to accommodate students who may be exhibiting COVID-19 symptoms (strongly recommended but not required).
COVID-19 Information-Center	Create a COVID-19 Information Center for students to utilize.
	Create a communications strategy for continually providing information regarding COVID-19, including when an employee or student tests positive for COVID-19 on campus, and the center's COVID-19 safety plan.
	<ul> <li>Use multiple communication channels to ensure students obtain the information in a way that they are most likely to review and/or comprehend the information. This may include automated messaging (text and/or email), print, oral presentations, posters, and other means.</li> <li>Communications on employee or student positive tests for COVID-19 on campus must comply with personally identifiable information (PII).</li> </ul>
COVID-19 Prevention Information	Provide ongoing information about COVID-19 ways of prevention.
	Inform staff and students that they should stay home if they are sick.
	Inform staff and students that they should notify center officials if they develop COVID-19 symptoms, test positive for COVID-19, or have been in close contact with someone with COVID-19 symptoms or a confirmed or suspected case.

Task Area	Plan Requirements and Actions
	<ul> <li>The center must, as appropriate, consult with its health and wellness staff, Humanitas, and local public health officials when a student or staff member tests positive for COVID-19, develops COVID-19 symptoms, or is in close contact with someone with COVID-19 while on campus.</li> <li>Medical isolation is used for suspected and confirmed cases of student COVID-19 infection.</li> <li>Quarantine is used to separate individuals who have had close contact with someone with COVID-19 to determine whether they develop symptoms or test positive for the disease.</li> </ul>
Minimize Traffic in Health and Wellness Centers	Create the ability for students to call ahead if they are exhibiting COVID-19 symptoms and wish to visit the Wellness Center.
	Provide alternatives to travelling to the Wellness Center that protect student privacy and confidentiality.
	<ul> <li>Conduct meetings in locations outside of the Wellness Center to reduce traffic. Ensure that physical distancing can be maintained.</li> <li>Use virtual meetings and/or consultations with applicants and students to reduce Wellness Center traffic. (This is not authorization to purchase telemed or telehealth platforms.)</li> <li>Platforms used for virtual meetings and/or consultations must comply with all HIPAA confidentiality requirements.</li> <li>Platforms used must be identified in the plan and a specific statement incorporated into the plan explaining how the platform complies with HIPAA.</li> </ul>
Automated Messaging	Implement an automated scheduling system for health appointments instead of using paper and pass slips.  • Describe whether the center has an existing system or whether a new system will be used. Program approval is required before a system can be purchased.
Coordination for Contact Tracing	Prepare appropriate staff to assist with contact tracing for future COVID-19 positive tests for staff and students.  • Identify the staff positions/titles used to assist in any future contact tracing.  • Explain how the center will ensure that access to and use of student medical information complies with applicable federal and state privacy and confidentiality laws.
Quarantine Zones	
Quarantine Zones	<ul> <li>Develop a plan for potential set-up of the area.</li> <li>Close off areas used by a person with a known or suspected COVID-19 infection and do not use these areas until after cleaning and disinfecting.</li> </ul>

Task Area	Plan Requirements and Actions
COVID-19 Support Groups/Services	<ul> <li>Provide a student support group.</li> <li>Work with the Student Government Association (SGA) and Health and Wellness to create a COVID-19 support group on campus.</li> <li>Accelerate smoking cessation programs and purchase smoking cessation aids.</li> <li>Transition from a Smoking to Non-Smoking center (recommended but not required).</li> <li>Evaluate campus smoking areas to ensure they encourage social distancing.</li> <li>Revitalize the HEALS program with added emphasis on eating heathy, encouraging individual exercise and promoting stable mental health.</li> <li>Post signs and use text messaging to provide resources for managing stress. These must include Job Corps specific stress management resources that are readily available but may also include the national distress hotline at 1-800-985-5990 or text TalkWithUs to 66746.</li> </ul>
Health Checks	Conduct daily health checks or ask staff, and students to conduct self-checks (e.g., temperature screening and/or symptom checking). <i>See</i> Considerations for Institutes of Higher Education, Recognize Signs and Symptoms, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html</a> (last accessed September 8, 2020).
COVID-19 Test Reporting	Report known test results using the database or system identified by the Job Corps. Reporting must protect PII but reporting will include the result of the COVID-19 test (positive or negative), race, sex, and state of residence (not the state where the center is located).

# **Area: Food Service**

Task Area	Plan Requirements and Actions
Dining Room and Dining Options	Expand meal times to maintain social distancing.
	Space seating/tables at least 6 feet apart when feasible to maintain physical distancing.
	Add additional seating options (e.g., exterior tables, and use other locations).
	Use automated food ordering systems for ordering food to maximize the use of "grab-and-go" bagged lunches and oncampus meal delivery.
	Use disposable food service items (e.g., utensils and dishes).
	If disposable items are not feasible or desirable, ensure that all non-disposable food service items are handled

Task Area	Plan Requirements and Actions
	with gloves and washed with dish soap and hot water or in a dishwasher. Individuals should wash their hands after removing their gloves or after directly handling used food service items. See Considerations for Institutes of Higher Education, Maintaining Healthy Environments, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#environments">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#environments</a> (last accessed September 8, 2020).
	Limit access to kitchen to non-kitchen personnel and strictly limit access to food preparation areas.
Cleaning Procedures	Establish cleaning protocols for seats, tables and high touch areas; frequently disinfect beverage machines.
	Clean between uses, when possible, or frequently clean these areas during the day.
Self-Serve Stations	Limit or eliminate the use of salad bars, self-serve stations, beverage stations and buffet-style options to minimize the possibility of contamination.
	<ul> <li>Serve individually plated meals instead of buffets and self-serve stations, if possible. See Considerations for Institutes of Higher Education, Maintaining Healthy Environments, available at <a href="https://www.cdc.gov/coronavirus/2019-">https://www.cdc.gov/coronavirus/2019-</a></li> </ul>
	ncov/community/colleges- universities/considerations.html#environments (last accessed September 8, 2020).
Handwashing Station	Install a handwashing station and/or hand sanitizer stations at the entry and exit doors in the dining facilities.
Feeding Quarantined and Isolated students	Establish food delivery plans for students in medical isolation and quarantine.
	Ensure the appropriate use of PPE.

**Area: Social Development** 

Task	Plan Requirements and Actions
Dormitory Thermometers	Place touchless (forehead) thermometers in each dormitory room and place multiple thermometers in each dormitory wing/area to promote health checks and ask students to conduct self-checks (e.g., temperature screening and/or symptom checking). <i>See</i> Considerations for Institutes of Higher Education, Maintaining Healthy Operations, Recognize Signs and Symptoms, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#operations">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#operations</a> (last accessed September 8, 2020).

Task	Plan Requirements and Actions
Daily Temperature Checks of Students	Conduct daily health checks during Morning Accountability Checks to monitor health or ask students to conduct self-checks (e.g., temperature screening and/or symptom screening questions).  See Considerations for Institutes of Higher Education, Maintaining Healthy Operations, Recognize Signs and Symptoms, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#operations">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#operations</a> (last accessed September 8, 2020).  Create and follow a schedule for cleaning and disinfecting
Dormitory Policies	thermometers.  Establish and implement "no room" dorm visitations for students.
	<ul> <li>Limit Dorm Room Occupancy         <ul> <li>Plan to initially reduce room occupancy to one or two students to promote physical distancing, depending on dorm size.</li> </ul> </li> <li>Install barriers between beds and bathroom sinks if maintaining 6 feet of physical distance is challenging. See Considerations for Institutes of Higher Education, Maintaining Healthy Environments, Communal Spaces, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#environments">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#environments</a> (last accessed September 8, 2020).</li> </ul>
	Shared bathrooms should be cleaned regularly using EPA-registered disinfectants, at least twice per day (e.g., in the morning and evening or after times of heavy use). <i>See</i> Guidance for Shared or Congregate Housing, Shared Bathrooms, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/shared-congregate-house/guidance-shared-congregate-housing.html">https://www.cdc.gov/coronavirus/2019-ncov/community/shared-congregate-house/guidance-shared-congregate-housing.html</a> (last accessed September 8, 2020).
Adjust Recreation Activities, Trips, and Schedules	Limit or eliminate activities and sports that require close physical contact. See Guidance for Shared or Congregate Housing, Recreational Areas such as Activity Rooms and Exercise Rooms, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/shared-congregate-house/guidance-shared-congregate-housing.html#specific-communal-rooms">https://www.cdc.gov/coronavirus/2019-ncov/community/shared-congregate-house/guidance-shared-congregate-housing.html#specific-communal-rooms</a> (last accessed September 8, 2020).  • Create more outdoor and spatial games. • Expand recreation locations and utilize virtual recreation opportunities (e.g., virtual workouts, multi-player video games, etc.) • Create at least 6 feet of distance between exercise equipment.  Establish automated activity signups with size limitations for
	recreational activities and areas, this includes weight and exercise

Task	Plan Requirements and Actions
	rooms.
	Eliminate off-campus recreational activities or trips for at least 30 days.
	Ensure at least daily routine cleaning of weight rooms and recreation equipment.
	<ul> <li>Make cleaning and disinfecting products available for student use.</li> </ul>
	Close all locker rooms, except the restroom facilities.
Independent Living Training	Ensure Independent Living Training emphasizes personal hygiene issues (e.g. showering, hand washing, clothes washing).
Student Swim Test	Suspend the water testing portion of the swim test until public pools reopen.
	Develop and make available a plan for determining if or when the center will resume water testing.
Counseling Groups	Limit group size in accordance with space-consider facilitating the counseling groups using technology (virtually) when appropriate.

Area: Transportation

Task	Plan Requirements and Actions
Instructions for Transportation Staff	Instruct vehicle drivers to practice regular hand hygiene, avoid touching their nose, mouth, or eyes, and avoid picking up multiple passengers who would not otherwise be riding together on the same route.  Instruct vehicle drivers to use face coverings.
Disinfecting Supply Kits	Provide disinfecting Supply Kits in all vehicles.
Vehicle Cleaning	All vehicles need to be disinfected and cleaned prior to and immediately after transporting students following CDC guidelines.
Vehicle Occupancy Limits and Social Distancing	Establish occupancy levels for each vehicle and remove seats where appropriate to ensure adequate physical distancing. When seats cannot be removed, mark seats that must remain empty. Use larger vehicles such as vans, when feasible, to allow greater physical distance between vehicle occupants.  Require the use of face coverings.
Protective Screening for Vehicle Drivers	Install Plexiglas shields or clear tarps in vans and vehicle, for protection of both student(s) and driver against spread of germs. Work with GSA as needed.

Task	Plan Requirements and Actions
Use of vehicles to transport symptomatic students	Alert the driver that they are being assigned to transport a symptomatic student. When transporting a confirmed or high probable COVID-19 positive passenger, it is recommended that drivers wear an N95 respirator or facemask (if a respirator is not available) and eye protection such as a face shield or goggles (as long as they do not create a driving hazard), and the affected passenger wears a facemask or cloth face covering. Restrict transport vehicles when they return to campus until they are cleaned and/or disinfected.

**Area: Supplies and Inventories** 

Air ca. Supplies and inventories	
Task Area	Plan Requirements and Actions
PPE Inventory for All Staff and Students	Ensure adequate inventory and resupply capability of PPE prior to resuming physical operations and ability to maintain stock.  See Job Corps PIN 19-18, Projected Annual Personal Protective Equipment (PPE) Needs for Job Corps Health Staff.
Medical Inventory	Ensure adequate stock of medications and that they are up to date and not expired.
Cleaning/ Sanitation Supplies	Have adequate supplies to support healthy hygiene behaviors.     Provide supplies, including soap, hand sanitizer with at least 60 percent alcohol (for staff and older children who can safely use hand sanitizer), paper towels, tissues, and no-touch trashcans where needed.  Order cleaning/disinfecting supplies that meet current CDC requirements.
	Ensure adequate inventory for on and off-campus locations in anticipation of more extensive cleaning/sanitation schedules.
Laundry Supplies in Dormitories	Ensure proper inventory of laundry supplies and cleaning kits to sanitize washers after every use.
Spill Kits	Ensure spill kits are replenished and well stocked.
Other Inventory Items	Ensure adequate inventory of the other health and safety related items such as HEPA filters systems, pulse oximeters, infrared forehead thermometers, O2 tanks and tubing with refill contracts, etc.

# **Area: Class Schedules**

	Plan Requirements and Actions
Task	
Expand School Day and add Evening and Weekend courses	Modify and/or add weekday, evening and weekend courses to accommodate physical distancing guidelines in classrooms/training areas, and ongoing distance learning.  Coordinate with the COR about potential financial impact, if any,

Task	Plan Requirements and Actions
	associated with requirement.
Staggered Class and Break Schedules	Stagger classes and breaks to maintain physical distancing.
	Stagger room use, when possible, to provide time to clean and disinfect between uses.
On-Campus WBL	Develop increased on-campus WBL opportunities for students.
Off-Campus Training and Testing Policy	Evaluate partners for off-campus training and testing to determine whether they meet the physical distancing and disinfecting guidelines.  • Make alternate arrangements if these facilities are non-compliant.
Sanitation Checklist in Trade Training Areas	Develop and utilize a sanitation checklist for instructors in all training/education areas to complete and sign.
Alternate Classroom/ Training Areas	Provide alternative training options (i.e., virtual in dorm room) for students with compromised immune systems or to accommodate class space limitations.
	Establish outdoor classrooms when possible to support physical distancing requirements.

**Area: Returning Staff** 

	Plan Requirements and Actions
Task	
Employee Handbook	Adopt addendums to the employee handbook and policies explaining expectations regarding safe practices and consequences for failure to comply (e.g., wearing of face coverings).
Communicate Expectations and Changes in Advance of Return	Develop advance written communications to notify all staff of changes that will be in place upon return, and document expectations and return process and schedule.
Staff Training Regarding Cleaning, Disinfecting and PPE	Develop policies for worker protection and provide training to all staff on cleaning and disinfecting expectations and guidelines on the proper use and disposal of PPE.
Staff Training on New Approaches	Train all staff on new community rules, guidelines and expectations related to physical distancing and intervention techniques and consequences for student non-compliance; provide staff training on social and counseling related issues (e.g. experiencing trauma, anxiety, stress, and domestic violence) to support students who are facing emotional challenges. This training can be provided virtually. If not delivered virtually, the center must take steps to ensure physical distancing and other

Task	Plan Requirements and Actions
Task	precautions are in place.
Communicate EAP Availability to Staff	Communicate EAP availability for staff that may need mental/emotional support. Re-inforce the telehealth line for staff to assist with emotional health support.
Staff COVID-19 Testing	Upon initially returning to campus as a part of resuming operation, center staff will be administered a COVID-19 test.
Plan for Daily Entry and Exits	Conduct daily temperature checks and COVID-19 exposure questionnaire.
	Document the process for staff daily entry and exit, including staggered schedules and possible remote work.
	Staff should stay home if they have tested positive for or are showing symptoms of COVID-19. See Considerations for Institutes of Higher Education, Promoting Behaviors that Reduce Spread, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#behaviors">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#behaviors</a> (last accessed September 8, 2020).  • CDC provides two options for returning to the campus include a symptom-based (i.e., time-since-illness-onset and time-since-recovery strategy) or time-based strategy or a test-based strategy.  • Centers should use the symptom-based approach that requires that at least 24 hours have passed since recovery. Recovery is defined as having no fever without the use of fever-reducing medications and improvement in symptoms (e.g., cough, shortness of breath), and at least 10 days have passed since symptoms first appeared. See Return-to-Work Criteria, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/hcp/return-to-work.html">https://www.cdc.gov/coronavirus/2019-ncov/hcp/return-to-work.html</a> (last accessed September 8, 2020).  • Discontinue using the symptom approach should local authorities or the CDC issue revised guidance.
Flexible Staff Assignments	Evaluate staffing needs to support new procedures such as maintenance/custodians, food service, recreation, instructors, classroom monitors and student isolation spaces.  Develop a plan for reassigning staff duties and responsibilities
	and/or securing additional staff to meet the new needs created by COVID-19 related procedures, including a possible outbreak of COVID-19 staff illnesses.
Access to Back up Nursing Resources	Identify additional resources to maintain nursing support in case of staff illness or surge in student illness.

	Plan Requirements and Actions
Task	
COVD-19 Screening of Job Applicants	Use job applicant screening questions consistent with current nondiscrimination guidance. EEOC guidance is that an employer may screen job applicants for symptoms of COVID-19 after making a conditional job offer, as long as it does so for all entering employees in the same type of job. <i>See</i> Question C.2 at <a href="https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws">https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws</a> (last accessed September 8, 2020).
	Centers must consult with their legal counsel to ensure the proper use of screening questions and the medical confidentiality of job applicants and center employees.

**Area: Returning Students** 

Area: Returning Students		
Task	Plan Requirements and Actions	
Student Handbook	Adopt addenda to the student handbook and policies explaining expectations regarding safe practices and consequences for failure to comply.  Educate students on the changes (e.g., the requirement to wear a face covering).	
Communicate Expectations and Changes in Advance of Return	Develop advance written communications to notify all students of changes that will be in place upon return.  Document expectations and return process and schedule.	
Prioritizing Student Returns	Develop a student return plan. See "Area: Administrative" above.  Implement flexible sick leave policies and practices that enable faculty, staff, and students to stay home or self-isolate when they are sick, have been exposed, or are caring for someone who is	
Unauthorized Goods and Supplies	sick.  Remind students of the list of unauthorized goods and supplies for students who are returning to campus.	
Keys and Room Assignments	Prepare room assignments and locker keys.  Minimize direct contact when distributing room and locker keys, if possible.  Consider housing students based on CTT selection to essist with	
	Consider housing students based on CTT selection to assist with possible contact tracing.  Limit room changes to the fullest extent possible upon student return.  • Prior to students occupying a dormitory room cleaning	

completed by the center.
Spaces not occupied for seven or more days need only a routine cleaning.
the student return intake checklist developed by Humanitas ssess the health and emotional wellbeing of students.
ge students first before bringing them on-site; implement ening and questionnaire at entry point; train additional staff pasic medical checks (temperature).
<ul> <li>point of arrival on campus, all students will receive a COVIDest. Students will then be quarantined for 14 days in gnated areas on-campus. Following the 14-day quarantine od, a second COVID-19 test will be administered.</li> <li>If at any time a student is symptomatic, the student will receive a COVID-19 test. Students testing positive must be isolated, consistent with CDC guidance, until they are cleared to discontinue isolation. See         Discontinuation of Isolation for Persons with COVID-19 Not in Healthcare Settings at <a href="https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html">https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html</a></li> <li>Centers will follow the developed protocol for medical isolation and contact tracing as per CDC guidelines.</li> <li>For public health reasons the center will not arrange for or use public transportation for any student known to be positive for COVID-19.</li> </ul>
on initially returning to campus as a part of resuming ration, center staff will be administered a COVID-19 test.
dents should stay home if they have tested positive for or are wing symptoms of COVID-19. See Promoting Behaviors that uce Spread at <a href="https://www.cdc.gov/coronavirus/2019-w/community/colleges-versities/considerations.html#environments">https://www.cdc.gov/coronavirus/2019-w/community/colleges-versities/considerations.html#environments</a>
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Task	Plan Requirements and Actions
	Students and staff who have recently had a close contact with a person with COVID-19 should also stay home and monitor their health. See Promoting Behaviors that Reduce Spread at https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#environments (last accessed September 8, 2020).  • Close contact is physical contact with an individual at 6 feet or less for 15 or more minutes. See Public Health Guidance for Community-Related Exposure: Current guidance based on community exposure, for people exposed to people with known or suspected COVID-19 or possible COVID-19, available at https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html (last accessed September 8, 2020).  • Students who have had close contact (within 6 feet of an infected person for at least 15 minutes) with someone with confirmed COVID-19 should be tested. See COVID-19 Testing Overview: Considerations for Who Should Get Tested, Aug. 24, 2020, https://www.cdc.gov/coronavirus/2019-ncov/symptomstesting/testing.html (last accessed September 8, 2020).
Plan for Managing Daily Entry of Students	Develop plan for managing co-enrolled and non-resident students that come and go from the campus daily.  Students should stay home if they have tested positive for or are showing symptoms of COVID-19. See Promoting Behaviors that Reduce Spread at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#environments">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html#environments</a> (last accessed September 8, 2020).
TEAP Intervention strategies	TEAP to meet with students immediately after return to reinforce intervention strategies and relapse prevention.
Washing of student clothing upon return	As part of the student intake process students must wash all of their clothing or centers must provide laundry service.

#### Conclusion

CDC guidance as of July 2020, is that schools should determine, in collaboration with federal, state, and local health officials whether to implement a testing strategy and how best to do so. Subsequent CDC guidance issued in August 2020 does not require testing for returning students. Job Corps, after consulting with its healthcare advisors, opted to create a testing protocol. The specific CDC recommendation used to develop the recommendation to test asymptomatic students and staff in Job Corps includes:

• "Certain settings can experience rapid spread of COVID-19. This is particularly true for settings with vulnerable populations in close quarters for extended periods of time (e.g., hospitals, nursing homes, and long-term care facilities)."8

Job Corps students present increased risk of infection and severe COVID-19 infection. According to the CDC, "[L]ong-standing systemic health and social inequities have put many people from racial and ethnic minority groups at increased risk of getting sick and dying from COVID-19. The term "racial and ethnic minority groups" includes people of color with a wide variety of backgrounds and experiences. But some experiences are common to many people within these groups, and social determinants of health have historically prevented them from having fair opportunities for economic, physical, and emotional health." The CDC also notes "increasing evidence that some racial and ethnic minority groups are being disproportionately affected by COVID-19." In Program Year 2018 the Job Corps student population was 76 percent non-white, including 47 percent black, 18 percent Hispanic and 12 percent other non-white. Nationally, COVID-19 cases among blacks are 2.6 times higher than whites. In Cases among Latinos are 2.8 times higher than whites. The CDC describes race and ethnicity as "risk markers for other underlying conditions that impact health — including socioeconomic status,

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<sup>&</sup>lt;sup>6</sup> Interim Considerations for K-12 School Administrators for SARS-CoV-2 Testing, https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/k-12-testing.html (last accessed September 8, 2020).

<sup>&</sup>lt;sup>7</sup> Testing for COVID-19: Considerations for Who Should Get Tested, August 24, 2020, <a href="https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/testing.html">https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/testing.html</a> (last accessed September 8, 2020). This guidance establishing that "people who have symptoms of COVID-19, people who have had close contact (within 6 feet of an infected person for at least 15 minutes) with someone with confirmed COVID-19, people who have been asked or referred to get testing by their healthcare provider, local external icon or state health department should be tested. Not everyone needs to be tested."

<sup>&</sup>lt;sup>8</sup> Coronavirus Disease 2019, Overview of Testing for SARS-CoV-2 (COVID-19), August 24, 2020, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/hcp/testing-overview.html">https://www.cdc.gov/coronavirus/2019-ncov/hcp/testing-overview.html</a> (last accessed September 8, 2020).

<sup>&</sup>lt;sup>9</sup> Health Equity Considerations and Racial and Ethnic Minority Groups, July 24, 2020, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/health-equity/race-ethnicity.html">https://www.cdc.gov/coronavirus/2019-ncov/community/health-equity/race-ethnicity.html</a> (last accessed September 15, 2020).

<sup>&</sup>lt;sup>10</sup> Id.

<sup>&</sup>lt;sup>11</sup> COVID-19 Hospitalization and Death by Race/Ethnicity, August 18, 2020, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html">https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html</a> (last accessed September 15, 2020); Boston University and the COVID Tracking Project, COVID Racial Data Tracker, available at <a href="https://covidtracking.com/race">https://covidtracking.com/race</a> (last accessed September 15, 2020).</a>
<sup>12</sup> Id.

access to health care, and increased exposure to the virus due to occupation (e.g., frontline, essential, and critical infrastructure workers). 13

People of any age with certain conditions are at increased risk of severe illness from COVID-19. These pre-existing conditions include, but are not limited to, obesity, diabetes, and sickle cell disease. When compared with young adults ages 18 to 24, Job Corps students have more than double the national rate of medical disability and chronic illness — 31 percent versus 14 percent in Program Year 2018. These conditions increase the severity and likelihood of death with COVID-19 infection. Widespread infection on campuses would also interrupt education and training due both to staff and student absences.

In addition to the higher risk described, to control transmission, testing may be appropriate when an individual is symptomatic consistent with signs or symptoms COVID-19, when an asymptomatic individual has had a recent known or suspected exposure to COVID-19, or asymptomatic individuals without known or suspected exposure to COVID-19.<sup>15</sup>

CDC guidance notes that in some facilities, COVID-19 cases have been initially identified among staff before any cases have been identified among the broader population in the same facilities. <sup>16</sup> Job Corps views contract center staff as a risk for introducing infection into Job Corps centers because they commute to centers from the communities in which they live. Therefore, initial staff testing upon the center resuming operations, the use of daily health screening questions, and temperature checks are required. Center operators are encouraged to take whatever additional measures they deem necessary to further protect the health of their staff and limit the risk of COVID-19 transmission.

The use of face coverings is strongly recommended by the CDC among students, faculty, and staff. Face coverings should be worn as feasible and are **most** essential in times when physical distancing is difficult.<sup>17</sup> According to the CDC, an individual can spread COVID-19 to others

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<sup>&</sup>lt;sup>13</sup> COVID-19 Hospitalization and Death by Race/Ethnicity, August 18, 2020, available at https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html (last accessed September 15, 2020).

<sup>&</sup>lt;sup>14</sup> People with Certain Medical Conditions, September 11, 2020, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html">https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html</a> (last accessed September 15, 2020); Evidence used to update the list of underlying medical conditions that increase a person's risk of severe illness from COVID-19, July 28, 2020, available at <a href="https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/evidence-table.html">https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/evidence-table.html</a> (last accessed September 15, 2020).

<sup>&</sup>lt;sup>15</sup> Interim Considerations for Institutions of Higher Education Administrators for SARS-CoV-2 Testing, When testing might be needed, <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/ihe-testing.html">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/ihe-testing.html</a> (last accessed September 8, 2020). *See also* the Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities that recommends using good hygiene, symptom screening, social distancing, and face coverings to prevent the spread of COVID-19. This same guidance provides that testing symptomatic and asymptomatic individuals and initiating medical isolation for suspected and confirmed cases and quarantine for close contacts, can help prevent spread of COVID-19 (updated Aug. 10, 2020).

<sup>16</sup> Interim Considerations for SARS-CoV-2 Testing in Correctional and Detention Facilities. Practical considerations

<sup>&</sup>lt;sup>16</sup> Interim Considerations for SARS-CoV-2 Testing in Correctional and Detention Facilities, Practical considerations for implementing broad-based testing for SARS-CoV-2 in Correctional and Detention Facilities, <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/correction-detention/testing.html#considerations">https://www.cdc.gov/coronavirus/2019-ncov/community/correction-detention/testing.html#considerations</a> (last accessed September 8, 2020).

<sup>&</sup>lt;sup>17</sup> Masks in Schools, <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/cloth-face-">https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/cloth-face-</a>

even if the individual is not feeling sick. A cloth face covering helps prevent a person who is sick from spreading the virus to others. The correct and consistent use of cloth face coverings is most important when students and center staff are indoors and when social distancing of at least 6 feet is difficult to implement or maintain. Specific considerations on the use of face coverings in public schools are provided in a recent CDC publication titled *Additional Considerations for the Use of Cloth Face Coverings Among K12 Students*. Similar guidance applies to colleges and universities. For these institutions, the CDC recommends "reinforcing use of cloth face coverings among students, faculty, and staff. Face coverings should be worn as feasible and are most essential in times when physical distancing is difficult. Individuals should be frequently reminded not to touch the face covering and to wash their hands frequently. Information should be provided to all students, faculty, and staff on proper use, removal, and washing of cloth face coverings."<sup>20</sup>

Job Corps' guidance for resuming physical operations is consistent with the CDC guidance on testing, cleaning and disinfecting, and physical distancing. The use of face coverings is required, with certain exceptions, on Job Corps campuses.

This guidance may be periodically updated to reflect new or emerging health concerns or precautions.

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<sup>&</sup>lt;u>cover.html</u> (last accessed September 8, 2020); Community, Work and School, Considerations for Institutions of Higher Education, https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html (last accessed September 8, 2020).

<sup>&</sup>lt;sup>18</sup> Masks in Schools, <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/cloth-face-cover.html">https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/cloth-face-cover.html</a> (last accessed September 8, 2020).

<sup>&</sup>lt;sup>19</sup> See Additional Considerations for the Use of Cloth Face Coverings Among K12 Students, https://www.cdc.gov/coronavirus/2019-ncov/downloads/community/CFC Guide for School Administrators.pdf (last accessed September 8, 2020).

<sup>&</sup>lt;sup>20</sup> Considerations for Institutions of Higher Education, <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html">https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html</a> (last accessed September 8, 2020).