



July 20, 2020

DIRECTIVES:	JOB CORPS PROGRAM INSTRUCTION NOTICE NO. 20-04
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TO: ALL JOB CORPS NATIONAL OFFICE STAFF
ALL JOB CORPS REGIONAL OFFICE STAFF
ALL USDA FOREST SERVICE CENTER DIRECTORS
ALL JOB CORPS CENTER DIRECTORS
ALL JOB CORPS CENTER OPERATORS
ALL JOB CORPS CENTER STAFF
ALL NATIONAL TRAINING AND SUPPORT CONTRACTORS
ALL OUTREACH AND ADMISSIONS CONTRACTORS
ALL CAREER TRANSITION SERVICES CONTRACTORS

FROM: DEBRA A. CARR DEBRA
Acting National Director CARR
Office of Job Corps

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Date: 2020.07.20
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SUBJECT: Providing Online and Correspondence Distance Learning

1. Purpose. To provide further direction on the required next steps in the development of distance learning for Job Corps students, which began on May 11, 2020.
2. Background. Program Instruction Notice (PIN) 19-17, “Transition from Spring Break to Virtual Operating Status for COVID-19” (April 24, 2020), announced Job Corps’ transition to distance learning at the end of Spring Break until Job Corps centers could resume on site training. PIN 19-17 specified all centers must implement distance learning with programs in place on May 11, 2020. It also noted the goals of distance learning are to allow students to remain connected to the program, to support gains in learning and career skills training, and to provide student enrichment activities. Job Corps recognizes distance learning may not be the learning method of choice for some students and some portion of the students in the program may find this approach to learning more challenging. Several options will be available to these students to support their continued attachment to the program, including new and expanded student leave options and the ability to be reinstated should a student need to leave program but wishes to return once centers resume physical operations.¹

It is the center operators’ responsibility to design and deploy distance learning plans that meet all contract requirements, including ensuring that appropriate internal controls are in place. Contract operators may have questions about their performance and performance

¹ Since students in Administrative Separation with Reinstatement have reinstatement rights, they are not officially separated from the program. Students remain in the center’s onboard strength count or enrollment numbers until they are officially separated from the program.

measures during distance learning. As with Frequently Asked Questions (FAQs) that will address concerns about student retention, Job Corps will provide FAQs and other guidance on assessing contractor performance, performance measures, and student retention during this period of distance learning.

Job Corps intends to begin resuming operations at centers as safety and health conditions permit. Guidance is being developed for operators on creating plans for safely resuming center-based operations. With approved plans in place, and when it is considered safe to do so, center-based operations will resume. To this end, Job Corps continues to communicate with contractors and other stakeholders; monitor the activities of the state and local jurisdictions regarding school closures, the status of shelter-in-place orders, and other COVID-19 related activities; and review White House Coronavirus Task Force and Centers for Disease Control and Prevention (CDC) guidance on responding to COVID-19. When considering resuming operations at Job Corps physical facilities, Job Corps must also examine the logistics and potential health risks associated with safely transporting thousands of students to 121 centers across the United States, the availability of medical supplies and other personal protective equipment, enforcing physical distances at centers with large student bodies, and implementing other precautionary measures in complex school settings.

3. Action. PIN 19-17 specified that center operators shall be responsible for designing and deploying distance learning plans that meet all contract requirements. The plans must be reviewed and approved by Job Corps. All center operators and National Training Contractors (NTCs) must submit their distance learning plans to the appropriate regional office no later than 14 days after the date of this notice. Plans will be reviewed and feedback provided no later than seven days after they are received. A survey of the regional offices found that most operators have already submitted their plans for review and regional concurrence.

Center operators and directors must ensure this PIN is distributed to all appropriate staff.

The NTCs have worked with their centers and center operators on the development of distance learning plans. These training contractors must continue collaboration with centers, including submitting their distance learning training plans to center operators for inclusion and/or reference in the centers' distance learning plans. Collaboration is essential to achieving the level of integration of NTC plans into center operations and center distance learning plans that Job Corps expects. Proprietary information of NTCs or other technical skills training providers should not be provided to center operators.

Job Corps' regional staff will review the plans to ensure that they reflect collaboration with NTCs and that they adequately describe their procedures and operations in at least these key categories.

- Course Content
- Scheduling
- Academic Support and Counseling

- Student Conduct
- Reasonable Accommodation
- Leave
- Recordkeeping and Reporting
- Learning Platform and Other Information Technology
- Budget and Costs

The regional review of plans will evaluate the quality of the procedures and operational descriptions with regard to several specific items within these key categories. Below are the required items, issues, and questions that must be specifically described in each plan. However, this is not an exhaustive list of items, issues, and questions that are appropriate for inclusion in a plan. Center operators must provide all additional information they believe is relevant to understanding and evaluating their plans and the operation of their distance learning programs.

- Course Content
 - Does the plan ensure that distance learning curriculum content and competencies are consistent with current program requirements?
 - Does the plan provide for a specific number of hours of individual instructional and/or counseling time for students?
- Scheduling
 - What measures are taken to ensure the length of the training day is consistent with Policy and Requirements Handbook (PRH), which requires that the average student to engage in learning activities for approximately 30 hours per week or six hours a day (unless later adjusted by Job Corps).² This may be online classroom instruction and other educational activities.
 - Does the plan assign students a weekly schedule that includes a combination of academic, career technical training, and other developmental and enrichment activities?
 - The National Board for Professional Teaching Standards recommends high school-age students receive no more than four total hours of online instruction per day. Does the plan require no more than four total hours of online classroom instruction per day?
 - Does the plan establish an expected time commitment for each assigned activity (*e.g.*, a weekly student schedule might include online math class for five hours, essay writing for three hours, independent reading assignments for five hours, CTT virtual classes for ten hours, independent living skills activities for two hours, and five hours of other specific instruction)?

² Enrolled students who may have found fulltime employment during the extended Spring Break period and the initiation of distance learning have the options of participating in distance learning or using one of the new and expanded leave categories or administrative separation with re-installment rights.

- Is the training day scheduling coordinated with technical skills training providers, including the NTCs, and is skills training provided for three to four hours during the training day (unless otherwise negotiated with the providers)? How is this demonstrated in the plan?
- Academic Support and Counseling
 - Does the plan include individualized student schedules based on student needs and ability levels?
 - Does the plan include creating instructor office hours to provide students access to one-on-one support? Does the plan describe how remedial educational needs are identified and addressed if a student is struggling in the distance learning environment?
 - Is the Evaluation of Student Progress (ESP) documentation consistent with current PRH requirements?
 - Is ESP conducted, either by conference call or virtually, every 60 days to assess student progress, as per current PRH guidelines?
 - Are academic and career technical training instructors required to submit evaluations for their assigned students? Do these evaluations reflect participation and progress in distance learning, and require the failure to make adequate progress be recorded on the ESP and that additional case management interventions be undertaken?
 - Does the plan incorporate a framework for the center engaging or interacting with students beyond providing academic and technical skills instruction? How does the plan propose to keep students engaged in the program?
- Student Conduct
 - How are students being oriented to the use and operation of the learning platform?
 - How are the expectations for student online attendance and participation communicated to students and staff?
 - Does the plan incorporate the use of the student code of conduct governing student infractions?
- Reasonable Accommodation
 - Does the plan include distributing a notice to students informing them that students with disabilities have the right to request and receive reasonable accommodations that allow them to participate in distance learning?
 - Are reasonable accommodation procedures included in the plan and how are the procedures communicated to students?
 - Does the plan require engaging in an interactive process with each student making a request to determine his or her individual accommodation needs?
 - Are disability coordinators participating in center weekly scheduling meetings and reviewing the courses assigned to students with

- accommodations?
 - Are reasonable accommodation effectiveness reviews incorporated into case management activities and discussed during each ESP review?
- Leave
 - Does the plan incorporate the use of the appropriate distance learning leave and status codes?
 - Are the leave verification and validation processes compliant with the PRH and each operator's Department of Labor (DOL)-approved standard operating procedures?
- Recordkeeping and Reporting
 - Does the plan incorporate the use of recordkeeping for student participation as a replacement for student attendance documentation?³
 - Do the processes and steps for case management during distance learning closely mirror those used when students are engaged in traditional learning on campus?
 - Are all student case management contacts during distance learning documented in each students' Center Information System (CIS) case notes?
- Learning Platform and Other Information Technology
 - Does the learning platform have adequate internal controls and are those controls described in the plan?
 - How is student personally identifiable information (PII) protected and/or maintained and described in the plan?
 - What learning platform and other IT resources are used to implement distance learning?
 - How are user platform and/or system issues addressed? Is there a process for troubleshooting or otherwise responding to or addressing operational failures experienced by the chosen distance learning platform?

Job Corps acknowledges not all of the Job Corps' PRH requirements are applicable in a distance learning environment and will provide additional guidance regarding the PRH in a forthcoming Change Notice. The Change Notice will make specific changes to existing provisions in the PRH to support center implementation of distance learning and will first focus on requirements in Chapter 3, Student Training Services. Center operators must still implement student accountability policies. However, operating in a distance learning environment will require that Job Corps and center operators adjust existing classroom accountability procedures for virtual classroom use. This will include, for example, how and when centers take attendance, how to track and measure student participation and timing of tasks, and the appropriate length of a training day online versus in a physical classroom. Provisions in the student code of conduct may require updating to address online student behaviors that may constitute conduct infractions.

³ Job Corps is providing this form as an attachment to this notice for centers to validate student participation in distance learning activities until JCDC implements updates to allow centers to document participation in CIS.

The current distance learning start-up period should be considered a soft launch of distance learning in Job Corps and issues developing during this period and anticipated thereafter should be discussed in each center's plan required to be submitted no later than 14 days after the date of this notice. During the soft launch, centers should note areas in the PRH that are not conducive to distance learning, or where there may be concerns about contract performance, and clearly identify such areas and possible remedies in their plans. Job Corps will address those areas through PRH Change Notices, Program Instruction Notices, and FAQs if needed and appropriate.

Additional information is provided below to assist centers in effectively and efficiently planning for, designing, deploying, and transitioning to a virtual learning environment. The information is intended to assist center operators in their design and deployment of centers' distance learning plans that transition education and training programs currently recognized in the CIS to distance learning programs.

I. Information Technology and Platforms

To assist in distance learning planning, centers completed a Student Technology Inventory survey to determine each student's access to the internet and internet-enabled devices such as phones, laptops, tablets, and desktop computers. Center operators should take into consideration the results of the completed inventory in developing and deploying their distance learning plans. The plans should account for and capitalize on the resources identified in the survey and take measures to fill any gaps and areas of need identified in the survey. The amount of wireless data available for student use may also be a significant factor in the design and delivery of a distance learning plan. Internet access, speed, and signal strength vary by geography. To ensure consistent internet access, online high school diploma (HSD) providers recommend three to five gigabytes of data, monthly.

As detailed in PIN 19-17, for the short-term, Job Corps will make some IT investments, as necessary, to support students who lack access to technology and cannot engage in distance learning. Once this IT equipment is purchased by Job Corps as government furnished property, the Job Corps Data Center (JCDC) will enter the items into Job Corps' Electronic Property Management System (EPMS). JCDC will provide the equipment to centers for delivery to students based on their needs as previously identified through the Student Technology Inventory survey or as otherwise determined by Job Corps. The provided equipment will be subject to the PRH, including Appendix 505, which deals with the administration and management of contractor-held government furnished property. Centers are responsible for ensuring they have accurate and current information on the location of each student scheduled to receive IT equipment. As a condition to the use of the equipment, each student will be required to execute an IT User Agreement and will be informed that theft or intentional damage to the device(s) will have specific consequences, including, for example, some level of cost reimbursement. Job Corps, through the JCDC, will provide student user IT support. Contact information for that support will be provided along with the devices.

At the time of property reconciliation, Job Corps will credit contractors for the loss or damage to IT equipment provided to students for distance learning that the contractors demonstrate is not attributable to the fault or negligence of the contractor.

Many operators use web-based platforms to deliver on-center and distance learning. Such platforms may include:

- Software that allows instructors to organize students into virtual classes and to post and provide feedback on assignments.
- Software that allows for messaging, chat, and videoconferencing with students.

Platforms Job Corps recommends for use by centers and operators to support distance learning are posted under the Distance Learning tab on the Job Corps Community Website at <http://jcweb.jobcorps.org>.

II. Academic Programs

A. *High School Diploma (HSD) Programs.* The following three fully online HSD providers currently meet Job Corps' HSD requirements:

- Penn Foster
- James Madison
- New Learning Resources Online (NLRO)

HSD students with internet-enabled devices and internet connectivity can immediately begin or continue their high school diploma coursework through an online HSD provider that meets PRH requirements as outlined in each center's distance education plan. Emailing instructional materials to these students is also an option. Students without access to the internet and/or internet-enabled devices should be provided printed copies of the HSD provider's online instructional materials by mail, including pre-paid return envelopes or packages. Operational details are available through the online providers listed above.

Some public and private high school partnerships, like SIATech, have migrated to distance learning during school closures. Local school district partners and state education agencies may also offer online HSD programs in response to the COVID-19 public health emergency. Brick-and-mortar high schools that meet PRH, Chapter 3.2.R5 *High School Diploma* requirements and use online learning only during the COVID-19 public health emergency are not required to meet the PRH, Appendix 302, 4.b Distance Education Accrediting Commission (DEAC) accreditation requirement.

Centers may need to meet with their HSD partner(s) to determine if additional students can be enrolled. However, if students are unable to continue remote or classroom-based HSD coursework with partnership high school(s), students

may be enrolled in an online program. The online program should readily accept transfer credits, allow students to demonstrate competency in coursework completed to date, and meet PRH requirements.

Students must take proctored tests such as mid-terms and finals so they can continue to make progress in program completion. In order to accommodate the distance learning environment for HSD coursework, including online examinations, the PRH requirements at 3.2, R8 (b), (c), (e), and (f) are waived for purposes of distance learning until further notice. Centers must work with their online test provider to ensure that all testing is conducted under appropriate conditions and with adequate internal controls to prevent or minimize disruptions and cheating. Unlike homework or “classwork,” tests must be administered and taken online as detailed in each center’s distance learning plans. As detailed in PIN 19-17, for the short-term, Job Corps may make some IT investments as necessary to support students who lack access to technology.

- B. *High School Equivalency (HSE) Programs.* HSE test publishers may not offer the opportunity for remote testing, and most HSE testing sites are not currently operating. Therefore, as specified in PIN 19-17, HSE coursework may only continue with an operational HSE partner or in an on-center program if the local testing site remains open. If the testing site is closed, HSD online learning programs must be used, and students will test when HSE testing sites reopen. Each center's distance learning plan should have contingency plans, like using online HSD programs, if a local testing center is not open.
- C. *Basic Skills Remediation Instruction.* PIN 19-17 states students must continue to receive remedial instruction in reading and/or mathematics until they can show Educational Functioning Level (EFL) gains on the Test of Adult Basic Education (TABE) follow-up assessments. As outlined in each center’s distance learning plan, student progress can be monitored through teacher-developed assessments and readily available tests like those found in the online [IXL](#) program. Students can access IXL by smartphone, tablet, laptop, and computer. IXL also provides an [At Home Learning site](#) to help teachers set up distance learning. IXL content is aligned with the knowledge and skills assessed on the TABE 11/12.

Many operators currently use online reading and math programs. Operators should seek to leverage online programs that have content aligned with the knowledge and skills assessed on the TABE 11/12 and have audio-video instructional and practice materials for all subjects. Additionally, operators should seek to leverage online programs that offer trainings for teachers on how to use the program to teach remotely. Programs recommended by centers and operators to support distance learning are posted under the Distance

Learning tab on the Job Corps Community Website at <http://jcweb.jobcorps.org>.

TABE workbooks and teacher-developed worksheets can be used to continue distance learning, including via mail and email if needed. Teacher instruction and feedback can be provided in writing and/or by phone, if available.

III. MyPACE

Students who enrolled in their Career Preparation Period (CPP) when Spring Break first started must complete the MyPACE career planning curriculum remotely as outlined in each center's distance learning plan. Instructors can continue to deliver the curriculum to students as a group via synchronous meeting software or existing teleconferencing systems. Instructors can use the Recap and Resources section of the [MyPACE platform](#) to provide summaries of the lesson content. The platform has full functionality on a smartphone. For students without internet access and supported devices, lesson materials can be sent to students via mail or email. When students return these materials, instructors can enter the students' responses into the platform to complete their career plans. Instructor feedback can be provided by messaging through the platform, in writing, or by phone, if available.

Students in the Career Development Period (CDP) must continue to enact their MyPACE Career Plans by completing the items on their Pathway Achievement Records (PARs). The center must assist students in completing these tasks remotely. PARs must be updated at every Evaluation of Student Progress (ESP). ESPs can take place by phone. Updated PARs can be scanned into E-Folder, if possible, or summarized in Case Notes.

IV. Career Technical Skills Instruction

- A. *Trade Offerings*. All trade offerings will remain available to students, as outlined in each center's distance learning plan. Job Corps centers must not discontinue certain programs merely because they are challenging to maintain through distance learning. The knowledge-based coursework content, such as vocabulary, trade math, etc., can be more readily delivered through distance learning. However, Job Corps recognizes that skill-based competencies, like welding and heavy operating equipment, may not be taught completely through distance learning. When students return to campus, they must be provided the opportunity to complete the performance or skill-based portion of their programs. Centers must contact the regional office if they have identified a training program that is believed to be too challenging to deliver through distance learning. The center and regional office must explore how to address perceived issues or barriers, and the regional office must then notify the national office to provide details on how the matter can be resolved.
- B. *E-TAR Completers*. Every effort should be made to retain students who are near completion. Centers need to identify students who are 90% complete and

develop an assessment protocol that supports the students' ability to demonstrate competency sufficient to have them become completers. In some instances, student completion may require the passage of a primary credential validated by a third-party industry certification. In these cases, the regional office must approve the testing protocol, and testing integrity must be ensured.

- C. *Instructional Delivery.* Platforms and programs recommended by centers and operators to support distance learning will be added to the Education tab on the Job Corps Community Website at <http://jcweb.jobcorps.org>. The website will be used for instructors to share resources and best practices. Centers and operators are encouraged to work with credential sponsors. Many sponsors provided links to their online curriculum, practice tests, and other resources that support both E-TAR progression and credential attainment.
 - D. *E-TAR Progression.* Centers and training providers should ensure student progress is tracked.
 - E. *Credentials.* All approved credentials are still available.
5. Contractual Matters. This Instruction Notice does not authorize a change in contract terms or requirements. Only Contracting Officers (COs) can authorize additional or changed work, through properly issued change orders. Center operators may not perform work not authorized under the contracts. DOL's Office of the Senior Procurement Executive will issue a change order to contractually implement this PIN and to provide for additional compensation, if appropriate. In issuing change orders and reviewing any requests for equitable adjustments, the CO will work in cooperation with the Contracting Officer's Representative. Requests for equitable adjustment must be directly linked to the contractor's approved distance learning plan and supported with adequate documentation of net increased costs.
 6. Effective Date. July 20, 2020. This notice remains in effect for the distance learning program until revised or rescinded.
 7. Inquiries. Questions about this Instruction Notice should be addressed to covid19@jobcorps.org.

Attachment: Job Corps Distance Learning Participation Form