



COUNTY OF LOS ANGELES  
WORKFORCE DEVELOPMENT, AGING  
AND COMMUNITY SERVICES



WORKFORCE DEVELOPMENT  
PROGRAMS DIRECTIVE

DATE: March 31, 2022

NUMBER: WDP D21-29

## Youth@Work COVID-19 Vaccine Verification At Juvenile Camps and Halls

### EXECUTIVE SUMMARY

This directive provides policy and guidance to County and Non-County Youth@Work providers regarding the procedure to verify the COVID-19 vaccination status of youth detained in Probation Camps and Halls during participation in Work-Based Learning (WBL). Additionally, this directive establishes procedures for weekly testing for participants with qualifying exemptions. These procedures shall be used to ensure all Probation Camp and Hall youth are in compliance with the [COVID-19 Vaccination of County Contractor Personnel](#) County Ordinance (Ordinance) at enrollment.

### REFERENCES

- [COVID-19 Vaccination of County Contractor Personnel](#)
- WDP D21-21 LA County Workforce Development Programs Storing COVID-19 Vaccination Records and Testing for Work-Based Activities
- WDP D21-12 WIOA Equal Opportunity and Grievance and Complaint Procedures

### BACKGROUND

On December 16, 2021, Los Angeles County provided information on its process to implement the recently approved Ordinance. As a condition of the Ordinance, all Youth@Work providers must comply with all applicable laws, regulations, ordinances, and requirements while:

- Interacting in-person with County Workforce members;
- Working on County-owned or controlled property, while performing services under a contract with the County; or
- Coming into contact with County Workforce Members or the public while performing In-Person Services under a Contract with the County

The Ordinance has been extended to included County contractors and their employees. As a result, Youth@Work participants must provide proof of COVID-19 vaccination or a qualifying exemption. The policy below provides procedures to obtain verification of compliance for youth housed in Probation Camps and Halls.

## **POLICY AND PROCEDURES**

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Youth@Work providers shall ensure that all youth enrolled to WBL provide proof of COVID-19 vaccination during enrollment to comply with the Ordinance. While youth are housed in Probation Camps and Halls, youth vaccination records, qualifying exemptions, and weekly testing results will be documented in Probation Department's medical record database system, Probation Electronic Medical Records System (PEMRS). Youth@Work providers shall ensure the use of the following policy and procedures to comply with the Ordinance when enrolling Probation Camp and Hall youth on and after January 1, 2022.

### **Verification of Vaccination Status**

Youth@Work providers assigned to Probation Camps and Halls will receive a completed **Certification of COVID-19 Vaccination** (Attachment I) for referred youth housed in Probation Camps and Halls, attesting to the vaccination status of the referred youth. Probation staff will provide a completed Certification of COVID-19 Vaccination as an attachment of the referral, via the Probation Automated Referral System (ARS). Each Certificate of COVID-19 Vaccination form will indicate one of two options to comply with the Ordinance:

- Full vaccination, as documented in PEMRS or
- A qualifying religious or medical exemption, as documented in PEMRS

Youth@Work providers shall retain the Certificate of COVID-19 Vaccination to document compliance with the Ordinance. Referrals with Certification of COVID-19 Vaccination indicating full vaccination do not require additional weekly verification.

### **Weekly Verification**

Referrals with Certification of COVID-19 Vaccination indicating a qualifying exemption must receive weekly verification of a negative COVID-19 test result. Probation staff will provide a **COVID-19 Weekly Certification** (Attachment II) each week of program participation. Youth@Work Providers shall collect the COVID-19 Weekly Certification through the referral's attachment via the ARS. Youth@Work providers shall retain the COVID-19 Weekly Certification to document compliance with the Ordinance.

Youth@Work providers must inform their Probation Camp or Hall staff leads of participants missing a COVID-19 Weekly Certification forms to immediately stop all WBL activities. Additionally, Youth@Work providers shall contact Lisandra Marquez via email ([Lisandra.Marquez@probation.lacounty.gov](mailto:Lisandra.Marquez@probation.lacounty.gov)) to request missing COVID-19 Weekly Certification forms not uploaded to the ARS. Participants may resume program activities only after a completed COVID-19 Weekly Certification form indicating a negative COVID-19 test result is collected for the workweek specified on the form.

### **Maintenance of Confidential COVID-19 Vaccination and Testing Records**

Youth@Work providers must maintain any medical or disability information, including COVID-19 vaccination and testing related information or documentation, in a separate medical file.

Records must be stored in a separate locked location or otherwise secured method (e.g., password protected) apart from other participant information kept in hard copy and/or electronic formats. Maintenance and storage of these records must follow the Health Insurance Portability and Accountability Act of 1996 (HIPAA) security standards and general requirements for protecting health information established via HIPAA's Privacy and Security Rules. This information shall be treated as confidential medical records, and access to the records must be limited, except to the extent of the following:

- Youth@Work service provider management that must be informed about work restrictions or reasonable accommodations.
- First-aid and safety personnel that need to be informed if a participant's medical condition or disability may require emergency treatment.
- Government officials investigating compliance with the law are required to be provided with relevant information upon request.

Please refer to County of Los Angeles [WDP D21-12 WIOA Equal Opportunity and Grievance and Complaint Procedures](#) for full guidance and procedures regarding nondiscrimination and equal opportunity procedures outlined in WIOA Section 188 and 29 CFR Part 38 and refer to County of Los Angeles [WIOA D17-03 Collection and Maintenance of Medical and Disability Related Information](#) for additional guidance on collection and maintenance of medical and disability related records.

## **ACTION**

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Youth@Work providers shall ensure that the policy and procedures described herein are communicated throughout the operations, management, and governance structures of its organization and that this directive is appropriately maintained until further notice.

## **INQUIRIES**

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Inquiries regarding this directive and the policies and procedures described herein should be directed [Youthatwork@wdacs.lacounty.gov](mailto:Youthatwork@wdacs.lacounty.gov).

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**Irene Pelayo, Program Manager**  
**Workforce Development**

### **Attachments:**

Attachment I- [Certification of COVID-19 Vaccination](#)

Attachment II- [COVID-19 Weekly Certification](#)