Oklahoma Office of Workforce Development
900 N. Portland Ave.
Oklahoma City, OK 73107

OKLAHOMA WORKFORCE DEVELOPMENT ISSUANCE #03-2019

TO: Workforce Development Board Chair
Workforce Development Board Staff
Workforce Development Fiscal Agents

FROM: Sarah Ashmore, Interim Executive Director

DATE: June 28, 2019

SUBJECT: Guidance for the Development of the Adult and Dislocated Worker Individual Employment Plan

PURPOSE: The Oklahoma Office of Workforce Development (OOWD), as the Governor's chosen Workforce Innovation and Opportunity Act (WIOA) administrative entity, provides this issuance to communicate Oklahoma's processes and procedures for the development of an Individualized Employment Plan (IEP) for each individual determined to be eligible for Title I Adult and Dislocated Worker programs. This policy establishes the minimum standards for procedures to be developed and adopted by each local workforce development area.

REFERENCES:

- WIOA sec. 134(c)(2)(A)(xii)(II)
- OWDI 19-2017, Change 1
- 20 CFR § 680.170
- OWDI 02-2016, Change 2

MESSAGE: The Individual Employment Plan (IEP) is an individualized career service that is jointly developed by the WIOA participant and the Title I case manager. The IEP is an ongoing strategy that is flexible when necessary to accommodate the participant's needs, and is designed to help ensure a positive employment outcome. Each Adult or Dislocated Worker (DLW) must have an IEP that targets their specific needs. The IEP must identify employment goals, achievement objectives, and the appropriate combination of services needed to achieve the employment goal(s).

RESCISSIONS	**EXPIRATION DATE**
None	Continuing

IEP goals are defined as the desired short and long term outcomes the participant wants to achieve. Achievement objectives are the steps established between the case manager and the client that, when reached, represent successful completion of a particular goal or portion of the IEP.

The Comprehensive Assessment.
The IEP starts with an objective and comprehensive assessment. The purpose of the assessment is to identify an employment goal or career pathway for the individual, and to determine the skill levels and service needs for the individual to obtain or retain employment. Additional specialized assessments may be required to identify academic levels, goals, interests, skill levels, abilities, aptitudes, and supportive service needs. The comprehensive assessment(s) given and a summary of assessment results must be documented in the Adult or DLW program participant's IEP.

Developing the Individual Employment Plan.
The initial development of an IEP will identify where the client currently is, where the client wants to be, and the appropriate mix and sequence of services and support to reach a realistic employment goal or career pathway. Updates to the IEP are required when there are changes to the employment goal(s), the training goal, and/or services necessary to remove barriers and achieve the goals listed in the IEP.

OKJobMatch is the tool used to record the IEP, as well as the Individual Service Strategy (ISS) required for each Title I Youth participant. Each adult or youth participant's plan is entered by choosing "Individual Employment Plan / Individual Service Strategy" in the Enrollment Details section of the appropriate WIOA program (Adult, DLW, or Youth). Please note that guidance pertaining to the development of the Individual Service Strategy (ISS), required for each Title I Youth participant, is found in current WIOA Title I Youth Program Guidance, OWDI #02-2016, Change 2.

The virtual IEP/ISS includes the fourteen (14) components below, and are further described in Attachment A to this issuance.

1. Comprehensive Assessment & Career Research.
2. Employment Goals & Achievement Objectives.
3. Training Goals.
4. Client Strengths and Attributes.
5. Combination of Services to Overcome Needs/Barriers.
6. Assistive Technology Needs for Achieving Goals
7. Client Responsibilities and Agency Responsibilities.
8. Economic Need Statement and Planning.
9. Supportive Service Needs.
10. Follow-up Services Planned.
11. Performance Goals & Accountability Indicators.
12. Client Progress Review.

13. Additional Notes.
14. Client Involvement Statement.

The initial development of the IEP requires entries in OKJobMatch for components 1 - 11 and component 13. However, the initial entry for Supportive Service Needs (component 9) may, for example, be a statement that the participant has indicated they currently have no supportive service needs and the topic will be reviewed during future contacts. Additionally, an entry of not applicable (N/A) may be entered in a section that does not pertain to the individual. For example, N/A may be entered when there are no Assistive Technology Needs (component 10), or when Additional Notes (component 13) are not vital to the initial IEP.

Client Progress Review
Progress reviews of the IEP goals must be documented in component 12 of the IEP, Client Progress Review. The IEP must be reviewed on a regular basis, no less than quarterly, and may be reviewed more frequently as determined necessary by the local workforce development board (LWDB). Local IEP policy must address the frequency and content of progress reviews. A brief summary of how the individual is progressing in the current phase of their employment plan should be addressed in the IEP. The IEP must be amended when necessary to reflect any deviations from the initial employment plan.

The Client Involvement Statement.
The final component of the IEP/ISS is a signed Client Involvement Statement. The participant must agree to the employment goal(s), achievement objectives, and combination of services listed in their IEP or ISS, and virtually sign the Client Involvement Statement upon development.

Changes to the IEP/ISS do not require a new virtual signature unless there is a change in the training or employment goals, achievement objectives, or the combination of services to be provided. Case Management updates do not require a new client involvement statement.

EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT: All Recipients, and Sub recipients/Sub grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

ACTION REQUIRED: This Oklahoma Workforce Development Issuance (OWDI) is to become a part of your permanent records and made available to appropriate staff and sub-recipients.

INQUIRIES: If you have any questions about this issuance, please contact Policy and Program Staff in the Oklahoma Office of Workforce Development. Contact information can be found at http://www.oklahomaworks.gov/about/.

ATTACHMENT A

OKJobMatch Virtual IEP/ISS

The following instructions are for the completion of the Individual Employment Plan/Individual Service Strategy found in the WIOA Program Enrollment section of OKJobMatch. A summary or narrative of each IEP/ISS component must be entered in the virtual IEP, as described in OWDI #03-2019.

	IEP / ISS Components	Instructions
1.	**Comprehensive/Objective Assessment & Career Research**.	• Identify all comprehensive/objective assessment tools used, including any known assessments given by partner entities. • List the date or dates assessments were completed. • Summarize assessment results. • Provide a brief overview of the participant's employment history. • Document any career research completed by/reviewed with the participant. • Indicate whether participant has a clear understanding of job requirements based on research completed, including labor market information (LMI), when appropriate. • Address the action taken when results of the career research are not in alignment with assessment results. • For information regarding the Objective Assessment required for each Youth participant refer to OWDI #02-2016, Change 1.
2.	**Employment Goals & Achievement Objectives**.	• Identify the employment goal(s) and address alignment with assessment results. • Identify a timeline for achieving the major employment goal, including achievement objectives leading to the goal. • If applicable, identify short term and long term employment goals (e.g., a participant's career pathway).

3.	**Training Goals and Achievement Objectives**.	• Document that training is necessary to achieve the identified employment goal and/or career pathway goals. • Identify whether the participant is currently enrolled in training and needs assistance for completion. • List the type of training, including occupational skills training (OST), on-the-job training (OJT), or other work-based training such as work experience, registered apprenticeship, or a transitional job. **Note:** The justification for work experience or a transitional job must be entered in section 5. • Ensure training is for a demand occupation or required for a career pathway that leads to a demand occupation. • Provide a detailed description of the participant's training plan, including the training provider, the dates of training, and identification of achievement objectives expected or resulting from the training program attendance. • Modifications to the training plan must be documented in the IEP as they occur, including: (1) Date of modification (2) Modification number (3) Identification of what is being modified (i.e., record the need and necessary actions to resolve the need). • **Note:** A modified training goal must remain aligned with the participant's career pathway/employment goal and any change to the training plan will require an updated Client Involvement Statement.
4.	**Client Strengths and Attributes**.	• Summarize skills and experiences from prior employment, training, hobbies, volunteer work, and home/family responsibilities as they relate to the employment goal. • Consider any personal characteristics, assets, and resources that can be related to the employment goal.

5.	**Combination of Services to Overcome Needs/Barriers.**	• Address the appropriate combination of services for the participant to achieve their employment goals. The following barriers must be addressed if identified, and necessary services to overcome all identified barriers must be entered. ▪ Basic skills deficient; ▪ School Drop Out; ▪ Lacks skills, training, or a credential; ▪ Criminal record; ▪ English as a Second Language (ESL); ▪ Lack of transportation; ▪ Substance Abuse; ▪ No Driver's License; ▪ Lack of Child Care; ▪ Difficulty finding employment; ▪ Poor work history, i.e., chronic unemployment or inconsistent work history; ▪ Homeless; and ▪ Other identified barriers, as observed, stated by the participant, or listed in the client's Demographics section of OKJobMatch. • Include a statement regarding the need for a Transitional Job or Work Experience. • List any short term prevocational skills to be provided, such as communications skills, development of learning skills, personal maintenance skills, professional conduct, etc. • List identified solutions to the needs/barriers listed, including ▪ Who will provide the service ▪ Date service is expected to be started and completed ▪ Document any referrals made to partner agencies and community partners.
6.	**Assistive Technology Needs for Achieving Goals.**	• Address any requested reasonable accommodations without the mention of a disability or details of a disability. • If applicable, enter a general statement regarding requested assistive technology needs, if any, for seamless customer service delivery.

		• Enter N/A if this section does not apply.
7.	**Client Responsibilities and Agency Responsibilities**.	Include responsibilities required by local policy and/or local procedures that are <u>not</u> addressed in the Client Involvement Statement. **Client Responsibility examples:** • Frequency for contacting the designated WIOA case manager; • Frequency for face-to-face meetings with the WIOA representative; • Requirement to actively seek and accept training related employment upon completion of services, which may include feedback regarding employment search, e.g., application and resume submission, interviews scheduled or completed, and follow-up with employers; • Attend training regularly and provide verification of satisfactory training progress, as requested; • Provision of specific information regarding attained employment before leaving the program, including the name of employer, job title, start date, rate of pay, benefits received or eligible to receive, etc.; • Respond to all surveys and other requests for information after leaving the program, including the follow-up interview; • Timely notification of changes in training status, including non-attendance and adding or dropping classes; • Reporting eligibility for Pell or other grants or financial assistance; • Reporting address or phone number changes; and • Other responsibilities, as determined by local policy and procedures. **Responsibilities of WIOA staff may include:** • Oversight/regular monitoring of training activities, • Submission of appropriate paperwork in a timely manner, • Providing regular support and assistance as necessary for program success, • Providing career and job search guidance,

		• Ensuring appropriate referrals to workshops and partner entities to enhance the client's success in the job market, and • Other responsibilities, as determined by local policy and procedures.
8.	**Economic Need Statement and Planning.**	• Summarize the financial needs articulated by the client through the interview, assessment, and enrollment process. • For the Adult program, enter the Priority of Service Category. • Document Pell eligibility/ineligibility, as well as exploration and documentation of other financial aid options such as Tribal funds, scholarships, TAA, education funding for Veterans, etc. • Note if the participant is in default on student loans and document any steps taken to help the individual get out of default, e.g., the provision of financial literacy information. • Other information as per local policy and procedures.
9.	**Supportive Service Needs**.	This section pertains specifically to supportive services provided with Title I funds, not partner provided services, which are addressed in section 5. • Enter the supportive services provided and a brief statement as to the necessity of the service. • Document the date of provision, amount, etc.; • Provide an explanation of why any requested supportive services were not provided.
10.	**Follow-up Services Planned.**	For individuals in the Adult and DLW programs: • Enter details about planned follow-up services after employment attainment. • Document the services as they occur.
11.	**Performance Goals & Accountability Indicators.**	• List measurable skills gains that are expected according to the training plan. • List the credentials that are expected outcomes of the training goals/training plan. • List planned credential attainment dates.

12.	**Client Progress Review.**	• Include a brief summary of how the individual is progressing in the current phase of their employment plan, based on feedback from the participant, an instructor or supervisor, or documents provided such as grades, certificates of completion, etc. • Indicate the progression made or difficulties encountered during the review period. <u>For example</u>: *Training was successfully completed four months ago but Joe has not yet attained employment. A mock interview was set up with ABC, Inc. and it was determined that he does not interview well and also needs resume assistance. A new entry has been entered in section 5, Combination of Services to Overcome Needs/Barriers.* • Any modifications to the IEP resulting from a progress review must be documented in the appropriate section. For example, employment goal, training goals, supportive services, etc.
13.	**Additional Notes**.	Enter any additional information necessary to the IEP/ISS and success of the client, such as why there is a gap in service. <u>For example</u>: *Joe's mother passed away and he will travel to New York to attend the services and settle her estate. He has made arrangements with the training provider to resume training in three weeks when he returns to Oklahoma.*
14.	**Client Involvement Statement.**	• Virtual attestation to the Client Involvement statement is made in OKJobMatch. • For modifications to the original IEP not conducted in person with the participant, the case manager must schedule an appointment with the participant as soon as possible to review the IEP and obtain the virtual signature to the Client Involvement Statement. • For case management only updates, check the box indicating a client agreement is not required.

Information found in the IEP, does not have to be duplicated in Program Notes, unless required by current Data Validation policy.