

MEMORANDUM

DATE: November 13, 2006

FROM: Richard Gilbertson, Director
Workforce Integrated Programs Division

TO: LWIB Staff

SUBJECT: Assessment/IEP Policy Changes

There has been some questions surface in regard to the Oklahoma Employment and Training Issuance (OETI) # 14-2005, which provides policy to the LWIBs for Assessment and Individual Employment Planning. These inquiries have been considered and policy change has been made where appropriate. Below each question has been posed with a response. If a policy change is required, the OETI page number, paragraph, and change will be stated below the response.

Question: With the “Customer and Service Integration” initiative, it appears that WIA eligibility may be determined for all those customers served. This would create a larger number enrolled and significantly increase the number of IEPs. Does the state policy apply to all of our WIA Adult and Dislocated Workers?

Response: On page 1 of the OETI, under the “purpose” section, the policy states “The state of Oklahoma is committed to a Workforce Investment Act (WIA) policy that provides effective comprehensive assessment and individual employment plans (IEP) for participants enrolled in Adult and Dislocated Worker training under Title I.” This current paragraph requires only participants enrolled in training to comply with the OETI.

Question: On page 5, F. Post Employment Needs, the policy states “These needs (follow-up services) will not be addressed until after the participant exits.” Shouldn’t the policy allow for follow-up services to be assessed before exit?

Response: After reviewing the regulations, we agree that follow-up services may be assessed before or after exit. The policy has been modified with the following action:

Replacement: p. 5, sec. F. - This section shall be replaced with the following.

F. Post Employment Needs

Participants must be made aware of follow-up services that are available to them and those needs may be assessed and services planned prior to or after placement in unsubsidized employment. Because the OSL Employment Plan closes and cannot be opened after participants exit, and in order to maintain a

single area for recording “Post Employment Needs,” all assessment and planned follow-up services will be recorded in the OSL Program Notes section.

Question: Why does the OETI call for the service providers to write the procedures instead of the LWIBs?

Response: LWIBs develop their policies within the parameters of the state policy described in OETI #14-2005. This policy may be an adapted form of the state policy, provided that it contains all requirements. The procedures are a part of the day-to-day operations of the provider as defined in the OETI on page 12 and must comply with the state and LWIB policy. The OETI states that the provider will “submit their Assessment/IEP procedures to the LWIB for approval.” The LWIB has complete approval authority allowing it to enact any provisions, provided the procedures comply with state & LWIB policy. In a case where the LWIB wishes to develop operational procedures for their providers, they have the authority to do so. To clarify policy the following action has been taken:

Replacement: page 1, Background section, 2nd paragraph. This paragraph shall be replaced with the following:

The Federal Register / Vol. 65, No. 156 / p. 49297/ Friday, August 11, 2000 / Rules and Regulations, describe the role of WIBs as one of “focusing on strategic planning, policy development and oversight of the local workforce investment system.” This state policy is based on the Workforce Investment Act and provides guidance for LWIBs in the development of their board policy and to direct their providers in the development of Assessment/IEP procedures.

Replacement: page 10, Action Required section, This paragraph will be replaced with the following:

Action Required: This state policy is based on the Workforce Investment Act and provides guidance for LWIBs in the development of their board policy and to direct their providers in the development of Assessment/IEP procedures. Providers should submit their Assessment/IEP procedures to the LWIB for approval and LWIB staff will conduct oversight by monitoring to assure that processes are being conducted in accordance with provider procedures. To complete its role, the State will provide oversight to assure the LWIBs and their providers are in compliance with state guidelines.

Question: After LWIBs approve the providers’ Assessment/IEP procedures, must all minor changes be resubmitted to the LWIB for approval?

Response: Each LWIB must decide their own process for approving procedures and modifications. After formal approval LWIBs may wish to designate a staff member to represent them in the approving of minor changes. Periodic changes should be necessary to continually improve the systems.