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OKLAHOMA EMPLOYMENT AND TRAINING ISSUANCE # 14-2005, Change 1

DATE: May 5, 2006

FROM: Richard Gilbertson, Director
Workforce Integrated Programs Division

TO: LWIB Staff

Subject: Policy for Assessment and Individual Employment Planning

Purpose: 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 policy establishes the minimum standards for procedures to be developed and adopted by each WIA Title I program. The State bases this policy on CFR 663.240 (a) and (b), and best practices.

Background: The regulations call for states to “establish policies, interpretations, guidelines, and definitions to implement provisions of Title I of WIA.” These Assessment/IEP policies include the State’s guidelines to Oklahoma Local Workforce Investment Boards (LWIBs) for the development of Assessment/IEP procedures.

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. The State will issue *Assessment/IEP Model Procedures* referenced throughout this policy.

Message: The results of the intensive services Comprehensive Assessment and Individual Employment Plan shall be conducted with WIA Adult and Dislocated participants and used in conjunction with one another. Although the core service Initial Assessment should be conducted before either of these two intensive services, with its information being used in the comprehensive assessment, these policies pertain only to Comprehensive Assessment and the IEP. While the order in which these functions are delivered

may be flexible, based on the participants' needs, the assessment and employment plan shall generally follow the logical order listed below:

- Determine the Employment Goal – Determine the occupational goal upon which the plan will be developed.
- Identifying Barriers and Needs – Determine the obstacles that participants need to address and overcome to attainment their employment goal(s).
- Develop an Employment Plan – Assign services and training to address identified needs and barriers.
- Conduct Progress Reviews – Conduct periodic reviews of the participant and their plan to determine progress and any related problems that may arise.

The tool used to guide the Assessment/ IEP process is the Oklahoma Service Link (OSL) Employment Plan. Supportive documentation for required fields will be organized in the same sequence as the fields in the OSL Employment Plan. Instructions for developing procedures for the required OSL fields are included below:

A. Determine Employment Goal(s) (CFR 663.245 & CFR 663, p. 49337, 3rd column; and OETI #09-2005)

The employment goal shall be established by using a self-directed career decision-making or job matching process to determine the best job match for training and services. This process will ensure participants are being trained in a demand occupation that leads to a self-sufficient salary and they have a probable chance for success. Procedures must provide a description of the process including supportive documentation maintained in the IEP section of the case file verifying how employment goals are determined. A best practice approach for determining employment goals is provided in Attachment 4 to the “Assessment/IEP Model Procedures.”

In some cases, an individual may select an occupation in which the provider does not conduct training, there is no labor market demand, or there is other rationale for not providing training in the chosen occupation. A review may be conducted of that occupation's cluster and a related occupation may be jointly agreed to if the provider conducts training in that occupation. If individuals are not satisfied with the occupation, they may be directed to the resource room, where other financial aid may be researched for their chosen occupation. Documentation of this action must be provided in the “Additional Notes” field of the OSL Employment Plan.

If participants are currently in training with money from another source paying the training costs, the participant is not required to go through the job matching process described above. However, the following steps must be taken to verify that their employment goals meet the criteria for demand occupations, they have a probable chance for success, and the occupation wages should lead to a self-sufficient salary, before service or training can be received:

- Confirm that participants have an employment goal(s) and it matches their training. If not, they must proceed to the job matching process described in the providers' job matching procedures for determining an employment goal.
- Review the demand occupations list to determine if the occupation, for which they are training, is a demand occupation. (Refer to demand occupation definition in section III)

- Conduct a review of their training/education progress to assure that they have a probable chance to successfully complete the training.
- Use an occupational information source, such as the OKCIS occupations section, to allow the participants to review information about their employment goals such as wages, outlook, and other related occupations.

When participants have completed a job matching process to determine their employment goal with another agency or institution, the provider is encouraged to use those results. However, to assure they have completed a quality process, the following steps must be taken:

- Review all career assessment results including codes or scores to assure probable chance for success and file a copy of codes or scores.
- Review the demand occupations list to determine if the occupation, for which they are training, is a demand occupation. (Refer to demand occupation definition on page 11 of this policy)
- Obtain the name of the LMI or occupational information used in the career research.

Results of these functions shall be entered in the OSL Employment Plan fields “Occupational Assessment and Career Research” and “Justification for Employment Goal” according to instructions for these two fields on page 7 of this policy.

B. Vocational Goal

The vocational goal is the occupational skills training goal that will enable participants to attain their employment goal(s). The goal is sanctioned by the Case Manager as one in which participants have a probable chance for success. Procedures must contain elements of the goal (e.g., training course title, expectation from training, etc.) If training is not being funded by WIA Title I, it should be noted in the OSL Employment Plan “Vocational Goal” field.

The goal shall be entered in the OSL Employment Plan field “Justification for Vocational Goal” according to instructions for this field on page 7.

C. Plan for Identifying and Overcoming Barriers/Needs (CFR 663, pg. 49320, middle Column)

The assessment of needs covers basic skills, job getting skills, occupational skills, and job keeping skills. Assessment/IEP procedures must include these 4 categories and ensure that participants are assessed for complete employability readiness. Once needs are identified, a plan of service/training must be developed to address them. These categories are listed below with explanations.

1. Plan for Identifying Barriers/Needs

- a. **Basic Skills** – Procedures must contain how basic educational skills will be assessed and what supportive documentation will be included in the IEP section of the case file. This process shall include the use of appropriate tests and any other relevant information. The method for determining need for assistance and how it is applied must be stated in the procedures (i.e., participants reading below an 8.9 grade level needs assistance).

- b. Job Keeping Skills – Procedures must contain how job keeping skills will be assessed and what supportive documentation will be included in the IEP section of the case file. The method for determining need for assistance and how it is applied should be stated in the procedures. An example includes the use of a criterion-based checklist that is completed along with an interview that reveals personal problems have interfered with past employment. This would indicate a need for assistance.
- c. Occupational Skills – Procedures must contain how basic occupational skills will be assessed and what supportive documentation will be included in the IEP section of the case file. A method for determining need for assistance and how it is applied must be stated in the procedures. One example includes the use of a criterion-based checklist completed in an interview and reveals participants have no job experience or training in their employment goal. This would indicate a need for assistance.
- d. Job Getting Skills – Procedures must contain how job getting skills will be assessed and what supportive documentation will be included in the IEP section of the case file. The method for determining need for assistance and how it is applied should be stated in the procedures. An example indicating a need for assistance includes the use of a criterion-based checklist completed along with an interview and reveals that the participant is unable to find suitable employment, regardless of having marketable occupational skills in their employment goal.

2. Plan for Overcoming Identified Barriers/Needs

Procedures must contain how the appropriate service/training is matched to the identified need for each of the four categories. Results of this Identifying and Overcoming Barriers/Needs section shall be entered in the OSL Employment Plan field “Plan for Overcoming Barriers” according to instructions for this field on page 8.

D. Economic Statement and Planning

Procedures must include a process for reviewing “other grant assistance” or any other income sources that will aid them in achieving their employment goal(s). Also, include resources such as food stamps, TANF, child support, housing subsidy, etc.

E. Supportive Service and Assistive Technology Needs

Procedures must contain how supportive service needs are identified, including any assistive technology needs. A best practice use would include administering a checklist with the most common needs (e.g., Disabled, Transportation, financial problems, etc.) followed with a discussion of those checked. Each Workforce area may develop the list of needs used in their checklist.

Results of the supportive service needs determination shall be entered in the OSL Employment Plan field, “Required Supportive Services During Active Participation” and “Assistive Technology Needs for Achieving Goals” according to instructions for this field on page 8.

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.

G. Client Involvement Statement

According to the regulations, the IEP is “an ongoing strategy jointly developed by the participant and the Case Manager that identifies the participant’s employment goals, the appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals.” Workforce investment areas shall design their IEP procedures to involve participants in the employment planning process and create a client involvement statement to be signed by participants and Case Managers verifying their participation. This statement may appear in the “Client Involvement” field of the OSL Plan and verified with signatures after printing, or a separate hard copy page including the client involvement statement and the verification statement, found at the bottom of the OSL Plan, may be signed and filed with the plan. Case Managers should use their discretion to override participant decisions contrary to program policy or law. On these occasions, Case Managers will provide appropriate rationale in the “Additional Notes” section of the OSL Employment Plan.

H. Progress Review and IEP Modification (CFR 663.245)

Progress Review - According to the CFR, the IEP is an ongoing process jointly developed by the participant and the Case Manager. Periodic progress reviews shall be conducted and documented in the OSL Program Notes section. Procedures must describe how this ongoing process will be conducted. Local areas may define the term “periodic” in their procedures. Progress reviews may not always occur on a scheduled review date, but initiated when a problem or change necessitates an IEP modification. An example of the modification process is provided on page 9 of this policy in the “Client Progress Review” field. Sample notes are provided in the Assessment/IEP Model Procedures, Attachment 3, Sample Case File Program Notes.

I. Additional Notes

This field includes notes used to document details directly related to the original planning process (e.g, supportive services, occupational assessment, etc.). After the original planning process has been completed, notes regarding the OSL Employment Plan will be maintained in the OSL Program Notes sections. Documentation in the “Additional Notes” field or Program Notes section will follow the guidelines listed below:

1. Date – Date the notes were written. If notes are related to an action in the plan, it should reflect the same date as the plan. Stating the date first will provide a method of tracking any notes from an OSL Employment plan field.
2. OSL Employment Plan Field – If the notes apply to an Employment Plan field such as “Justification for Employment Goal,” write the name of the field behind the date before adding the notes. Using the date and the field assists in tracking.

An example of how notes related to the original planning process should be recorded is provided on page 9, under the “Additional Notes” field. An example of notes recorded in the OSL Program Notes, after the original planning process, is provided in the Assessment/IEP Model Procedures, Attachment 3, Sample Case File.

Required Information for Oklahoma Service Link Employment Plan

The purpose of the OSL Employment Plan is to submit specific data to OESC to meet both state and federal reporting requirements and provide an assessment and planning tool with a record for participants, case managers, monitors, and supervisors. Instructions for completing the fields of the employment plan, with examples and references to the regulations, Act, and Oklahoma Employment and Training Issuances (OETI) are provided below. Any reference with an * preceding it is from the Preamble of the CFR and holds no authority, but should be used for guidance. Updated versions shall be printed and maintained in the IEP section of the case file. Even though procedures may vary from area to area, these instructions for completing the OSL Employment Plan are required and must become part of the provider’s procedures.

Oklahoma Service Link Employment Plan

INSTRUCTIONS	EXAMPLE	REFERENCE
<p>Occupational Assessment and Career Research (Refer to page 2, sec. A. of this policy)</p> <p>1. Occupational Assessment – Using the selected combined career assessment program or career assessment instruments, record the instrument name(s) and results. If participants are currently enrolled in training, record “currently enrolled.”</p> <p>2. Career Research – Record name of occupational information used.</p>	<p>1. <u>Assessment</u> - Self-Directed Search; Codes - SER</p> <p>2. <u>Career Research</u> – OKCIS (Occupations Sec.), Demand Occupations List</p>	<p>CFR 663.245</p> <p>OETI #09-2005</p>
<p>Justification for Employment Goal (Refer to page 2, sec. A. of this policy)</p> <p>Record the employment goal resulting from a decision-making process and record the title with rationale for selection. If the goal cannot be sanctioned by the Case Manager, provide an explanation under the field “Additional Notes.”</p>	<p><u>Goal:</u> CNA</p> <p><u>Rationale:</u> CNA was selected by the participant and occupational assessment and career research indicates that there is a demand and probable chance for success in the employment goal.</p>	<p>*CFR 663, Subpart E, pg. 49337, 3rd column and 663.310 (b)</p> <p>OETI #09-2005</p>
<p>Justification for Vocational Goal (Refer to page 3, sec. B. of this policy)</p> <p>Record the vocational training goal and how it will assist in achieving the employment goal. If training cost is not being provided by WIA, note it.</p>	<p>By successfully completing the Northeast Technology Center CNA program and passing the state CNA exam, the participant will have the skills necessary for attaining her employment goal.</p>	
<p>Client Strength Not in use</p>	<p>Optional</p>	

INSTRUCTIONS	EXAMPLE	REFERENCE
<p>Plan for Overcoming Identified Barriers or Needs (Refer to p. 3, sec. C. of this policy) Record the following information</p> <ul style="list-style-type: none"> • date of plan. • record the skills category • need in the skill category • achievement objective • projected start and end dates <p>If there are no needs in a category, record the category and note that there is no deficiency.</p>	<p><u>Date:</u> 9-15-04</p> <ol style="list-style-type: none"> 1. <u>Basic Education Skills</u> – Adult Basic Education – increase Reading and Math to 9th level – <u>Start:</u> 9-20-04 – <u>End:</u> 10-20-04 2. <u>Job Keeping</u> – no deficiency 3. <u>Occupational skills</u> – CNA training - successfully complete the Northeast Technology Center CNA program - <u>Start:</u> 9-23-04 – <u>End:</u> 3-10-05 4. <u>Job Getting</u> – Job Readiness (resume & interviewing) – successfully complete Job Readiness Trng - <u>Start:</u> 9-16-04 – <u>End:</u> Open ended 	<p>CFR 663.245</p> <p>*CFR 663, pg. 49320, middle column</p>
<p>Assistive Technology Need for Achieving Goals (Refer to page 4, sec. E. of this policy) Record the date of service. If the participant has a disability, identify it and describe any accommodations that will be made to assist participants in achieving their stated goal(s).</p>	<p><u>Date:</u> 9-15-04 - Participant has been diagnosed with a hearing problem and has been referred to Vocational Rehabilitation for assistance with the purchase of a hearing aid.</p>	
<p>Client Responsibilities and Agency Responsibilities</p>	<p>Optional</p>	
<p>Economic Need Statement and Planning (Refer to page 4, sec. D. of this policy) Record that the participant has exhausted other grant assistance to pay for training cost. List any other financial sources that will support and assist in the attainment of the employment goal.</p>	<p>WIA Title I Adult program funds will pay for the participant’s training cost. She is unable to obtain enough grant money for her training. Jane’s only other source of income is from SSA in the amount of \$632.00 per month.</p>	<p>CFR 663.310 (d)</p>
<p>Required Supportive Services During Active Participation (Refer to p. 4, sec. E of this policy) Record date need was identified, any supportive service needs and supportive service provided</p>	<p><u>Date:</u> 9-15-04 - Transportation problems – OCIA will provide Jane with travel assistance money</p>	<p>*CFR 663, pg. 49320, middle column</p>

INSTRUCTIONS	EXAMPLE	REFERENCE
<p>Post Employment Needs (Refer to page 5, sec. F. of this policy)</p> <ul style="list-style-type: none"> Record the required information in the OSL Program Notes section. 	<p>Record in OSL Program Notes section</p>	<p>*CFR 663, pg. 49320, first column</p> <p>CFR 663.150 (b)</p>
<p>Client Involvement Statement (Refer to page 5, sec. G. of this policy for alternatives)</p>	<p>In consulting with my Case Manager, I have determined that the employment goal and service strategy stated in the IEP is my choice and is consistent with my assessment results. I also understand that this is a general plan of services and training and it is neither an entitlement nor a contract between the program and the participant.</p>	
<p>Client Progress Review (IEP Modification) (Refer to page 5, sec. H. of this policy) If there is a need to modify the plan, a review is conducted and the following information is entered.</p> <ul style="list-style-type: none"> Date of modification Modification number Review number (when mod. occurred) Field modified Need Necessary actions to be taken If applicable, record achievement objective, projected start and end dates 	<p><u>Date:</u> 10-3-04 <u>Mod:</u> 1 <u>Review:</u> 1 <u>Field Modified:</u> Required Supportive Services During Active Participation <u>Needs:</u> Additional Financial Resources <u>Action:</u> Refer to DHS for food stamps</p>	<p>CFR 663.245</p>
<p>Additional Notes Record IEP case notes according to page 5, sec. I. of this policy</p>	<p>9-15-04 - OCCUPATIONAL ASSESSMENT AND CAREER RESEARCH - Jane has worked in lower level wage and skilled health occupations in the past, but just hasn't made enough to sustain her. She stated that the health occupations have always interested her. REQUIRED SUPPORTIVE SERVICES DURING ACTIVE PARTICIPATION - Jane indicated that she would have a difficult time paying for gas with her car, which is an older model and gets poor mileage. The problem was significant enough to create second thoughts about whether she could go to school and survive.</p>	

Support documentation for OSL Employment Plan

Support documentation, with a copy of the OSL Employment Plan, will be maintained in the IEP section of the case file. The file must follow the requirements listed below.

- A. IEP Case Checklist – For tracking purpose, an IEP case checklist will be used as a cover sheet for the IEP Case section. It should be organized as follows:
1. State the titles of each of the OSL Employment Plan fields in the same order as they are in the Employment Plan. If state policy or local procedures do not require support for a field, do not include it on the cover sheet.
 2. State the support document title (e.g., Supportive Service Checklist, SDS Score sheet, etc.) under the field title that it supports.
 3. When a document is filed it should be checked on the checklist allowing the Case Manager to know if the document is in the file and its location.

An example of an IEP case checklist may be reviewed in the Assessment/IEP Model Procedures, under Attachment 2.

- B. Required Documents – Documents must include, but not be limited to:
1. Copy of the OSL Employment Plan
 2. Copy of Program Notes (after initial IEP development)
 3. Occupational Assessment and Career Research – Any career assessment instrument results or score sheets used.
 4. Plan for Overcoming Identified Barriers – Documentation of how the needs were determined and the services and/or training was assigned to address those needs.
 5. Economic Need Statement – Documentation of financial need and available resources.
 6. Required Supportive Services During Active Participation – Documentation of how supportive service needs were identified (e.g., checklist)

Procedures must describe and provide copies of IEP support documentation. A model IEP section of a case file is available for programs to review.

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.

Contact Information: Refer inquiries to Robyn Coman at robyn.coman@oesc.state.ok.us or (405) 557-5318 or Tami Decker at tdecker@oesc.state.ok.us or (405) 962-7595.

Definitions

The following definitions describe the important elements within policy for Assessment/Individual Employment Planning (IEP).

Demand Occupation – The Oklahoma Employment and Training Issuance (OETI) #09-2005 requires that LWIBs develop a demand occupations list in accordance with its instructions. Any reference to demand occupations in this IEP policy pertains to occupations on LWIBs' lists.

Case Management – The Provision of a client-centered approach in the delivery of services, designed –

- To prepare and coordinate comprehensive employment plans, such as service strategies, for participants to ensure access to necessary workforce investment activities and supportive services, using, where feasible, computer-based technologies; and
- To provide job and career counseling during program participation and after job placement.

(Workforce Investment Act, 1998, 112 STAT. 939, sec. 101(5))

Initial Assessment – As a core service it is necessarily a brief preliminary information gathering process that, among other things, will provide sufficient information about an individual's basic literacy and occupational skill levels to enable the One Stop Operator to make appropriate referrals to services available through the One-Stop and partner programs. (CFR Part 663 Adult and Dislocated Worker Activities, p. 49320)

Comprehensive Assessment – As an intensive service, is a more detailed examination of these issues (identified by the initial assessment) and may explore any number of things relevant to the development of a person's IEP. (CFR Part 663, p. 49320)

Employment Goal(s) – The occupation or several related occupations selected by the participant and sanctioned by the Case Manager in which the participant wishes to receive WIA services and/or training. The employment goal(s) is established by using a self-directed career decision-making or job matching process to determine the best job match for training/services. The employment goal(s) is the basis for IEP development.

Assessment Purpose – The purpose of assessment is to help individuals and program staff make decisions about appropriate employment goals and develop effective service strategies for reaching those goals. (CFR Part 663 Adult and Dislocated Worker Activities, p. 49320)

Individual Employment Plan (IEP) – Is an ongoing strategy jointly developed by the participant and the case manager that identifies the participant's employment goals, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goals. (CFR 663.245)

Skills Assessment – Includes instruments or interview with criteria that measures acquired skills.

Career Planning - A system in which individuals evaluate their abilities and interests, consider alternative career opportunities, establish career goals, and plan practical development activities. (Thomson Nelson – Educational Publishing Co.)

Achievement Objective – Describes measurable planned action (services and training) necessary to accomplish the employment goal(s).

Informed Customer Choice – Choices made by customers using the best information available, including employment-related information (e.g., information about self such as abilities and interests), knowledge of support services, training providers, etc.

Operational Procedures – A written document that provides directions for step-by-step execution of actions necessary to perform identified processes. Procedures must be developed with sufficient detail to be used for the following:

- Executing functions
- Training personnel
- Conducting oversight

Job Match – A process that allows individuals to make informed choices in determining employment goal(s) used for the selection of needed services and/or training. Occupations selected should be demand occupations, lead to self-sufficient salaries, and be compatible with participants' abilities, allowing them a probable chance for success.

Self-Directed Decision Making Process – A step-by-step decision making process that allows the participant to understand the problem, consider, and explore alternatives, and make informed decisions.