DATE: April 1, 2013  
FJEP Policy Memo No. 13–03

TO: Farmworker Jobs and Education Program (FJEP) Projects

FROM: Mario Zuniga

SUBJECT: Individual Employment Plans for WIA Section 167 (National Farmworker Jobs Program) Participants

REFERENCE: FJEP Case Management System Manual, 2010-2011, pgs. 81-84, 179-185, 201-205

Purpose: To clarify the requirements for completing Individual Employment Plans (IEPs) for Florida National Farmworker Jobs Program (NFJP) participants.

Background: The preponderance of current IEPs filed in the master records of qualified NFJP participants in Florida are either incomplete or inaccurate, particularly as it relates to the employment goal/objective.

Policy: Effective April 1, 2013, FJEP offices will complete IEPs for all newly qualified NFJP participants in accordance with the guidance stipulated in this policy as part of the intake process and prior to the expenditure of any project funds on the participant. If any portion of the IEP for any currently active qualified NFJP participant needs to updated, revised, or reset for any reason, it must be revised and completed in accordance with this policy. This would include IEP revisions necessitated by pending exits or planned breaks in service. NFJP participants who are eligible for “Related Assistance Only” or “Emergency Assistance Only” services, are exempt from this policy and do not require the completion of an IEP.

A qualified participant’s stated IEP employment goal should not be changed prior to a participant being exited unless the participant has received extensive counseling by the case manager and received the approval of the local project coordinator. Employment goal changes should be annotated in the Customer Records Data (CRD) case notes, to include counseling and project coordinator approval dates. Should a change in the IEP employment goal be approved by the project coordinator, the existing IEP must be reviewed to ensure that the IEP education and support goals align with the new employment goal and revised with a new IEP entry date, if necessary.
More than one change in the employment goal of a qualified participant must be approved by the state office, and also annotated in the case notes. In all cases, all completed IEP forms should be signed by the participant and filed in the participant’s master record.

All IEPs must include at least one goal in each of the following IEP Categories: 1) Employment; 2) Education; and 3) Support. In addition, the employment goal must address a specific job title as identified in the Standard Occupation Classification (SOC) system by O*NET code, available at: http://www.bls.gov/soc/ (see example below).

When developing an IEP, every effort should be made to sharpen the focus of the NFJP participant towards realistic, achievable, and specific employment goals in high-demand, high-wage professions. In sum, the IEP should serve the role of being an “individualized strategic plan” for the participant and, as a result, be instrumental in moving them from the fields to obtaining meaningful employment.

Notwithstanding prior guidance to the contrary, it is the intent of this policy to move local projects towards an IEP development process which yields IEPs with a high probability of working as created the first time, i.e. that do not need to be continuously adjusted over time. To this end, participants who have not reached their IEP employment goal according to plan should not be exited unless every effort has been made to overcome the issues acting as barriers to accomplishing this goal. This includes the following:

- Resetting IEP entry dates and extending completion dates through the use of “planned breaks in service” when appropriate (see the FJEP Case Management System Manual, pg. 185, for specific details on how to reset IEPs to extend the 90-day exit timeline).

- Proactively monitoring pending exit reports to avoid default participant exits when no placement has been made or qualifying service has been provided in a consecutive 90 day period*.

  - In these cases, the fact that no placement has been made or qualifying service has been provided for a participant in 90 consecutive days may indicate a significant deviation from the original IEP goal accomplishment timeline has occurred.

- Ideally, these types of IEP deviations should be managed proactively and IEP entry dates for goals, activities, and timelines should be adjusted accordingly before the “no qualifying service in 90 days” period begins.

*90-Day Active Period – Fields tracked which define activities included in this timeline are outlined on pages 204-205 of the FJEP Case Management System Manual.
For unanticipated IEP deviations not recognized until the projected “no qualifying service” exit date is impending, project coordinators should immediately contact affected participants, making every effort to get them back on track before the exit occurs, and reset/revise the IEP accordingly. When more time is required to re-purpose participants due to significant IEP deviation coupled with the proximity of the exit date, the 90-day exit timeline should be reset by creating a new IEP with a new entry date for education, employment, and/or supportive services categories; and, end dates should be revised as appropriate. “IEP Update/Revision – see Case Notes” should be used as the language in the IEP Service Activity section for the appropriate IEP category.

In all cases, any revisions/updates made to IEPs should be fully documented in the CRD case notes, particularly as related to extension of IEP dates. The case notes of all participants should be reviewed periodically for similarities or patterns associated with IEP revisions/extensions to see if any potential correlations exist between external factors and the need to adjust or extend planning parameters. These patterns should be noted and used to improve strategies for IEP development and revision.

Please note that well-written IEPs which target the attainment of good jobs, rather than just solely addressing participant need, serve as the foundation for meaningful participant activity and should drive the way in which project funds are spent. In sum, a well-written, job-seeking IEP is truly value-added and serves to magnify the impact of effective and purpose-driven case management.

### IEP Example (timelines/dates not included)

<table>
<thead>
<tr>
<th>IEP Category</th>
<th>Goal/Objective</th>
<th>Service Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employment</td>
<td>To obtain employment as a: Job Title (O*NET Code).</td>
<td>Describe activity intended to develop skills related to the employment goal. For example, career exploration, employability skill development, job search strategies, resume writing, interviewing skill development.</td>
</tr>
<tr>
<td></td>
<td>For example: To obtain employment as a Nursing Assistant (31-1014.00).</td>
<td></td>
</tr>
<tr>
<td>Education</td>
<td>1) To take and pass needed ESOL courses. 2) To take and pass the GED. 3) To obtain a Certified Nursing Assistant Certificate</td>
<td>1) Attend and complete ESOL course. 2) Attend GED Prep courses and pass the GED test. 3) Attend and complete CNA course at ________ institution. 4) Take and pass CNA state certificate examination.</td>
</tr>
<tr>
<td>Support</td>
<td>Provide tuition fees and instructional materials to complete educational goals.</td>
<td>Process tuition fee and instructional material vouchers based on submitted enrollment paperwork and classroom attendance sheets.</td>
</tr>
</tbody>
</table>