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MEMORANDUM

TO: Farmworker Career Development Program (FCDP) Sub-Recipients

FROM: Ashley Meros, Ph.D.

DATE: December 31, 2025

SUBJECT: FCDP Policy Update Information on Writing the **Adult Individual Employment Plan (IEP)** for FCDP WIOA Section 167 National Farmworker Jobs Program (NFJP)

The purpose of this policy is to guide through and clarify the requirements for completing the **Adult Individual Employment Plans (IEPs)** for FCDP participants in the National Farmworker Jobs Program (NFJP) Grantee Performance Management System (GPMS).

Reference: [Section 167, Regulation §685.100, §685.370, 685.330 WIOA Section 129, TEGL No. 18-16 Change 2](#) and [National Farmworker Jobs Program Guide, June 2023](#), page 49-55.

Background: The NFJP Policy Memo No. 13-03 IEP is an individualized career service under WIOA that is jointly developed by the participant and case manager. An IEP is a document that identifies the participant's employment goals, the appropriate achievement objectives, and the applicable combination of services for the participant to achieve the employment goals. This includes providing information about eligible training service providers and career pathways that help the individual attain their career objectives. (NFJP Program Guide June 23, page 42).

Summary: The FCDP sub-recipients will utilize this guidance when preparing IEPs for all newly qualified FCDP participants. This process follows the guidance outlined in this policy and is an essential part of the intake procedure. It must be completed before any project funds can be allocated to the participant. Assessment tests should be administered before the IEP is created. Case managers must review and discuss the assessment results with the participant to advise, counsel, or guide the participant to post-education or training for employment. All completed IEP forms must be signed by the participant or their parent/guardian if the participant is a minor, as well as by the case manager. The case manager is required to review the IEP with the FCDP participant. Additionally, a copy of the IEP must be provided to the participant and uploaded into the GPMS.

Ashley Meros, Ph.D.
Chancellor of Career and Adult Education

FCDP 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.

If any portion of the IEP for currently active qualified FCDP participants needs to be updated or revised for any reason, it must be completed in accordance with this policy.

A qualified participant’s IEP employment goal **should not be changed**, unless the participant has received extensive counseling by the case manager and approval from the local program coordinator. Changes in employment goals should be annotated in the GPMS case notes under subject name: **Updated IEP** and must include program coordinator and case manager approval dates. Should a change in the IEP be approved by the program coordinator, the new IEP must be reviewed to ensure that the training and education goals align with the new employment goal. More than two changes in a participant’s employment goal must be approved by the **State Office** and annotated in the case notes.

All IEPs must include at least one goal in each of the following categories: ([TEGL No.35-14 change1](#))

1. Employment:

- 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 IEP example).
- Must be directly linked to an in-demand industry sector or occupation in the service area to which a participant receiving such services is willing to relocate [20 CFR §685.340\(b\)](#).

2. Training:

- Training Services: Training must be directly linked to an in-demand industry sector, occupation in the service area, or in another area to which a participant receiving such services is willing to relocate 20 CFR §685.340 (b). [WIOA sec.134 (C)(3)(D) and 167 D and 20 CFR §680.200] Examples include: occupational skills training, including training for non-traditional employment, on-the job training, apprenticeship (more information at NFJP Program Manual June 2023)
- OCP (Occupational Completion Point): If a participant does not complete a training program, the IEP should be updated with any completed OCPs to still have credential eligibility and measurable skill gain
- Schooling: Adult Basic Education (ABE), General Education Diploma (GED), English for Speakers of Other Languages (ESOL) **Note:** These services must be integrated with the training services

3. Support Services:

- Support Services must be directly linked to education and training. Support Services are necessary to enable an individual to participate in the activities under FCDP. These services may include, but are not limited to, the following: (WIOA sec. 3(59)), [TEGL No. 19-16](#)
- Assistance with Transportation
- Allowance payments: ([20 CFR §685.330](#))
- Needs-Related Payments (available only to individuals enrolled in training services, TEGL No. 19-16) See [FCDP Policy update for supportive Services](#)
- Assistance with books, fees, school supplies and other necessary items for students enrolled in post-secondary educational classes
- Payments and fees for employment and training-related applications, tests, and certifications
- Pre-employment training: Employability skills are general skills that are required to be successful in all sectors of the labor market. These skills are separate from the technical skills attained in career pathways or academic skills such as math and reading. Work readiness skills are a set of skills and behaviors that are necessary for any job. Work readiness skills are sometimes called soft skills, employability skills, or job readiness skills. These abilities help employees learn how to interact with supervisors and co-workers. These can include but are not limited to the following:
 - Basic Computer Skills
 - Interviewing Techniques
 - Resume Development
 - Dress for Success
 - Mock Interviews

When developing an IEP, every effort should be made to direct the focus of the FCDP participant toward 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/out school to obtaining meaningful employment. (See [Memorandum High Wage Full Time Job Placement for Adult and Youth WIOA 167 NFJP](#))

The intent of this policy is to move local projects toward an IEP development process, which yields IEPs with a high probability of working as they were created the first time, i.e., they 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 from the program unless every effort has been made to overcome the issues acting as barriers to accomplishing this goal.

This includes the following:

- Proactively monitoring projected end dates and 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 [TEGL No. 14-18 page 9](#)
- Exit dates should in all cases align with the anticipated IEP goal completion timeframe
- Extend a goal to provide the support services needed to help the participant reach his/her goals

Note: All participant activities related to the accomplishment of IEP goals should be monitored on a regular basis.

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 revise the IEP accordingly.

In all cases, any revisions or updates made to IEPs should be fully documented in the GPMS case notes, as well as related to extension of activity service dates. The case notes of all participants should be reviewed periodically for similarities or patterns associated with IEP revisions or 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 in the future.

Attachment: [IEP Adult Template](#)