

ILLINOIS DEPARTMENT OF COMMERCE AND ECONOMIC OPPORTUNITY  
OFFICE OF EMPLOYMENT AND TRAINING

CAREER PLANNING POLICY FREQUENTLY ASKED QUESTIONS FOR WIOA TITLE IB ADMINISTRATORS  
UPDATED 11-30-21

GENERAL

**Q1. *What type of training will be available for both staff and state monitors, so everyone has the same understanding of these changes and requirements?***

The Illinois Center for Specialized Professional Support and the Department of Commerce and Economic Opportunity's Office of Employment and Training's Technical Assistance Unit are preparing technical assistance and training around career planning that will be rolled out to implement this policy.

**Q2. *The draft policy does not include informational or virtual services. If customers can access self-service resources, why are informational services not included as a list of services? What about virtual services? Why does it have to be the definition of direct linkage by the Governor's Guidelines?***

The Workforce Innovation and Opportunity Act (WIOA) Final Rule at 20 CFR Part 678.305(d) identifies three methods through which partners can provide access to services at comprehensive one-stop centers - Having a program staff member physically present at the one-stop center; Having a staff member from a different partner program physically present at the one-stop center appropriately trained to provide information to customers about the programs, services, and activities available through partner programs; or making available a direct linkage through technology to program staff who can provide meaningful information or services.

That section of the WIOA Final Rule also defines direct linkage as providing direct connection at the one-stop center, within a reasonable time, by phone or through a real-time Web-based communication to a program staff member who can provide program information or services to the customer. A "direct linkage" cannot *exclusively* be providing a phone number or computer Web site or providing information, pamphlets, or materials.

Illinois elected to specify more detailed requirements in the *Governor's Guidelines to State and Local Program Partners Negotiating Costs and Services Under the Workforce Innovation and Opportunity Act (WIOA) of 2014* (Governor's Guidelines) for one of these methods—making services available through technology via a "direct linkage"—to assure a high-level of service quality for the customers of partners using this service delivery method.

Please note that Core Component one (1) of the Direct Linkage Components and Requirements in Illinois table in the Governor's Guidelines captures services delivered virtually and Core Component three (3) speaks to the provision of informational services.

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**Q3. *When will the final service matrix be complete?***

The Department of Commerce and Economic Opportunity's Office of Employment and Training (OET) is awaiting clarification from Region 5 Department of Labor to several questions. Once we receive a response and can finalize the chart, OET will be sending it directly to the Illinois Workforce Partnership Performance Task Force for their review and feedback. Please note that the services will match Training Employment and Guidance Letter (TEGL) 10-16, Change 1 and the service definitions are taken directly from TEGLs 19-16 and 21-16.

**REPORTABLE INDIVIDUALS**

**Q1. *The policy states that self-services must be captured in the Illinois Workforce Development System (IWDS). Whose responsibility is it to do this?***

To accurately reflect the number of people the Illinois workNet Centers (AJCs) serve it is necessary to collect some identifying information. Collecting basic information on these individuals is a way to demonstrate the breadth of services provided to customers beyond just employment and training services. This addresses a long-standing concern voiced by many that the system doesn't get credit for all the services provided within the one-stop by Title IB.

One-Stop Operators must ensure that staff, regardless of program, **request** identifying information to ensure tracking of WIOA self-service or informational services/activities. Local methods for tracking the number of reportable individuals and activities can include a swipe card, Resource Room Sign-In Form, or other local check-in procedure. Local policy should indicate the information necessary to conduct the tracking of services. **All Personally Identifiable Information (PII) must be protected following policy.**

The Workforce Innovation and Opportunity Act (WIOA) Title IB self-service basic career services, also known as Local Services, received by **Reportable Individuals** are to be recorded in the appropriate case management system and reported to the U.S. Department of Labor (USDOL). They are not included in the performance measure calculations. In the Illinois Workforce Development System (IWDS), these services must be captured under Local Services. Local Administrators are responsible for populating the list of services that display on the "Add Local Services" screen. It is imperative that local areas are accurately capturing in IWDS the local services being provided, so that all services provided through the local Illinois workNet Centers (AJCs) are being reported to USDOL. The numbers of Reportable Individuals reported by Illinois for self-service basic career services for WIOA Title IB programs are reported as entered into those Local Services screens in IWDS. These numbers are typically low and woefully misrepresent the number of citizens that receive those services in the Illinois workNet Centers.

Procedures related to entry into the Career Connect case management system can be found here - [Procedures – Chicago Cook Workforce Partnership \(zendesk.com\)](#).

**TWO-WAY COMMUNICATION**

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**Q1. *Currently, the two-way communication required every ninety (90) days; however, the draft policy states every thirty (30) days. Which is correct?***

The existing case management policy did not require a time frame for two-way communication for an active participant. The new policy will require two-way communication every thirty (30) days. This change aligns with the state's direction for strengthening service integration between programs (e.g. Trade Adjustment Assistance Act (TAA) co-enrollment).

**INDIVIDUAL EMPLOYMENT PLAN (IEP) / INDIVIDUAL SERVICE STRATEGY (ISS)**

**Q1. *I am confused regarding the Individual Service Strategy (ISS) timeline/customer and Career Planner date/service line entry. Can you explain this?***

The Individual Service Strategy (ISS) is required to be completed after the objective assessment prior to youth being enrolled into one of the fourteen (14) program elements under the Workforce Innovation and Opportunity Act (WIOA) Title IB Youth program.

WIOA Final Rule at 20 CFR Part 681.420 describes the design of the youth program under WIOA. To participate in WIOA Youth programs, a youth must be enrolled. Enrollment requires: 1) An eligibility determination 2) The provision of an objective assessment 3) Development of an Individual Service Strategy; and 4) Participation in any one of the fourteen (14) youth program elements.

Since the assessment process is used to develop the ISS and there currently is not a "service" for this activity in the case management systems, Illinois is requiring that the "Development of an ISS" be the first recorded "service" in the appropriate case management system for youth.

**Q2. *Will there be a new Individual Employment Plan (IEP) template statewide? The new addition of S.M.A.R.T.E.R. goals would make a new template helpful. Will this template be incorporated into the Illinois Workforce Development System (IWDS)?***

The Department of Commerce and Economic Opportunity's Office of Employment and Training (OET) is working towards creating an Individual Employment Plan (IEP) and Individual Service Strategy (ISS) template. Until that time, Local Workforce Innovation Areas (LWIAs) must ensure that the IEP and ISS used contains the required elements per the Act, Final Rules, and state policy. Changes to IWDS to incorporate the IEP template are not planned at this time; however, there are various mechanisms to capture the information in IWDS. Note that the activities/services provided to the participant must be recorded in the system and align with the goals in the IEP.

**Q3. *If a new Individual Employment Plan (IEP) template is created, this would be a significant change to our current local procedure. How will this affect our local area procedures?***

Noted. Some Local Workforce Innovation Areas (LWIAs) are requesting Individual Employment Plan (IEP) and Individual Service Strategy (ISS) templates to incorporate the requirements outlined in the Career Planning policy. The Department of Commerce and Economic

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Opportunity's Office of Employment and Training (OET) is working towards creating IEP and ISS templates. Until that time, LWIAs must ensure that the IEP and ISS used contains the required elements per the Act, Final Rules, and state policy. Having a consistent format for employment planning supports the goal of uniform service delivery across the state, improved monitoring, and more focused, data-driven technical assistance opportunities.

Standardized elements within an IEP and ISS will allow LWIAs and monitors to clearly outline and set expectations for career planners as well as defining each data element and information recorded in the IEP and ISS. Templates will help ensure the data/information in an IEP and ISS is reportable, comparable, and validated.

**Q4. *The policy states a review must occur on a regular basis - what is the definition of a review, and what is meant by direct linkage to performance goals in the Individual Employment Plan (IEP)?***

Part of the S.M.A.R.T.E.R approach is to *Evaluate* the goals, objectives, and activities/services to assess the success or failure in achieving a participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS). This review would necessitate the IEP/ISS to be altered if it is determined that the current goals and objectives are not being met, or if the activities and services needed or timelines have changed to achieve a successful completion.

Each activity and services provided to meet the goals and objectives of the participant should be tied back to one or more of the indicators of performance. For example if the goal for a participant is to complete a training program in a demand occupation and gain employment, then that goal is tied to all five performance measures – employment in Second (2<sup>nd</sup>) and Fourth (4<sup>th</sup>) quarters, median earnings, credential, and measurable skill gains.

**Q5. *Some of the one-time activities listed do not apply if a participant is just looking for employment. An example is suitability for the desired training program. What must a Career Planner do in these situations?***

The Department of Commerce and Economic Opportunity's Office of Employment and Training (OET) agrees that some elements may not be applicable. However, suitability is necessary for informed consumer choice whether it is looking for a training program or employment. It applies when developing the employment goals, appropriate achievement objectives, and the needed combination of services to address barriers that prevent successful participation of the customer.

The Individual Employment Plan (IEP) or Individual Service Strategy (ISS) must describe the conversations that are taking place between the career planner and participant to determine suitability for any services provided. Suitability includes working with the participant on aligning career goals to interests, skills, and abilities, reviewing occupational profiles, and employment outlooks for the selected occupation. This not only includes wage information and training needed, but also includes what employees actually do in the job, researching the career services, training services, and supportive services that are needed to achieve the participants' employment goals.

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While suitability is most important for putting the customer on a path to success and self-sufficiency, it also has the added benefit of increasing positive performance outcomes such as retention.

**Q6. *Do Individual Employment Plan (IEP) changes require the participant to sign the IEP, or can they be documented via two (2)-way communication and case notes?***

The draft policy states that a copy of the completed (or updated) and signed Individual Employment Plan (IEP) or Individual Service Strategy (ISS) shall be provided to the participant, recorded in case notes, and updated on the hard copy in the participant file.

During COVID, the Department of Commerce and Economic Opportunity's Office of Employment and Training (OET) Monitoring Unit has not issued findings on the lack of signature/date as long as the reason for the missing signature/date was documented in a case note explaining the reason why; however, career planners should make every attempt at obtaining a dated signature.

Please note that digital signatures are allowable and acceptable so long as the LWIA or grantee follows the requirements of the Uniform Administrative Guidance. Additionally, per DCEO's Legal Department digital signatures are allowed if it is the actual electronic signature and not something that was "auto generated" from an electronic system (for example – using the "script" font in Microsoft Word). Therefore, "signing pads" which would allow a participant to sign their name on a pad and it writes their signature on the application on the computer as a pdf document so that it cannot be altered would meet the requirements of the Uniform Administrative Guidance (see 2 C.F.R.§200.335 Methods for Collection, Transmission and Storage of Information.)

**Q7. *The policy states that all Workforce Innovation and Opportunity Act (WIOA) Title IB Adult or Dislocated Worker participants must have an Individual Employment Plan (IEP) as one of the first services provided since it describes the on-going strategy for the participants to achieve their goals. If a Career Planner is helping a person with job search assistance, and the person has no interest in training or work-based learning, would the Career Planner need to develop an IEP? Shouldn't the Career Planner be able to complete an initial assessment to provide individualized career services? If an IEP is required, wouldn't making a job seeker take multiple tests (interest inventory, TABE reading/math, digital literacy) when all they want is a job a waste of their time on testing them when we could be providing resume and job search assistance?***

Time taken to work with a customer to ensure they are suitable for a job of their interest is not wasted time. In the above comment the career planner should also provide resume and job search assistance as part of the services needed by the customer. When staff work with a customer directly to provide resume and job search assistance this becomes an individualized career service and the customer should be enrolled triggering the need for assessment and an Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

The IEP and ISS must be developed to show the career planner has done their due diligence to assist a participant in their employment goals. As a reminder, the Basic Skills Deficiency Tool is

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to be used for all participants prior to any assessment to assist in determining priority of service and for referral purposes.

For individuals whose employment goal is to immediately gain employment, the career planner must develop an IEP using the assessments listed in the policy to document such things as the participant's skills, any barriers to employment, or if any referrals are necessary. The Basic Skill Deficiency Assessment policy provides for situations in which the reading and math assessments (TABE and/or CASAS GOALS) are not required. One such situation is if the IEP shows there was a decision made jointly between the participant and the career planner that career services will accomplish the desired employment goal(s). However, if the participant is unable to meet their employment goals through Career Services or change their mind about receiving Training services, then the reading and math assessments are required to be enrolled in Training services before the participant can be certified for training.

**Q8. *Are the Individual Employment Plan (IEP), Individual Service Strategy (ISS), and assessments living documents?***

Yes. The Individual Employment Plan (IEP) and Individual Service Strategy (ISS) are living documents in that they need to be evaluated and altered to ensure the participant is getting the services they need to meet their goals. Assessments are used to create or modify the IEP/ISS and since assessment is not a one-time activity, some of these elements may require re-assessment. Such elements include those listed in the policy (i.e., employment goals, interest and skills inventory, essential employability skills, barriers to employment, suitability for the desired training program if applicable, referrals, etc.). As an example, a participant's employment goals may change based on further career exploration or the participant lost their childcare provider and now they need assistance.

**CAREER PLANNER ROLES**

**Q1. *Is the Career Planner and customer the only parties allowed to be part of Individual Employment Plan (IEP) development? The Illinois Workforce Development System (IWDS) provides a 3rd party option. How do sub-contractors fit in to this scenario? Can an intake/enrollment person conduct this portion?***

The state policy uses the term "Career Planner" as a general term for the individual that provides **career planning services** to the participant.

A career planner that is assigned to manage a participant's case is the only appropriate individual to make entry into the appropriate case management system on services related to that person.

However, as part of career planning services and to facilitate effective service integration, the state suggests where appropriate, integrated resource teams be utilized to provide a holistic approach to serving customers. This provides a seamless customer experience, increases coordination, and eliminates duplication.

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An intake/enrollment person's roles and duties typically do not consist of providing the key components of career planning which includes building rapport, effectively communicating, identifying appropriate services, convening key service providers, connecting participants with services, creating a strong employment plan, motivating and encouraging, following up after an appointment(s), monitoring services, and follow-up after exit. Therefore, those individuals would not qualify as an individual who provides career planning services and may not be a party to the development of an IEP or other duties of a career planner as specified in the Career Planning policy.

**ASSESSMENT**

**Q1. *Does the Basic Skills Screening Tool negate all testing that happens prior to testing; this should be done in the reverse order?***

The Basic Skills Screening Tool (Tool) must be given prior to conducting any assessment test. The Tool assists in determining priority of service and for referral purposes. The goal of the Tool is to determine basic skills deficiency (BSD) for purposes of eligibility and priority of service instead of relying on the approved math and reading assessment tests (TABE 11/12 and/or CASAS GOALS) to determine BSD.

It is important to note the Tool was developed to quantify the portion of the Workforce Innovation and Opportunity Act (WIOA) definition of Basic Skills Deficient in which a youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

This negates the only mechanism for determining BSD as someone who scored at or below 8th grade level on math or reading assessment tests for purposes of determining eligibility and priority of service.

Basic skills deficiency assessments as outlined in the Assessment Process for Basic Skills Deficiency section of the Basic Skills Deficiency Assessment policy such as reading and math assessments are then completed to meet the portion of the legislatively mandated Youth assessment which includes an assessment of basic skills and to support an Adult and Dislocated Worker participant's ability to do the level of work required for the training program they are attempting to enter.

Our assumption is that the commentor means that the parts of this section concerning the Basic Skills Screening Tool should be moved to its own section since it must be done prior to any assessment. OET agrees and has made changes to the policy.

**Q2. *How does basic skills screening tool fit in when sub-contractors (Adult Ed programs) are administering the TABE and/or CASAS for the local area applicants? If the customer is determined basic skills deficient (BSD), what process needs to be recorded in the Illinois Workforce Development System (IWDS) case notes?***

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Should an individual be referred to the Workforce Innovation and Opportunity Act (WIOA) Title IB services and a formal assessment has occurred within the last six (6) months and is provided by the partner agency or participant, it is acceptable to use that assessment if it addresses employment goals and basic skills testing, along with employability skills, abilities, and interests. If basic skills testing meets those requirements, then the Basic Skills Screening Tool (Tool) does not need to be completed. However, it is important to remember that in all other instances, the Tool must be given prior to conducting any assessment test. The Tool assists in determining priority of service and for referral purposes. Career planners are to have the individual complete the Tool prior to being referred to the Adult Education provider to administer the TABE 11/12 and/or CASAS GOALS math and reading assessment tests for those participants who are not English Language Learners. Note there are three different tests approved for use for English Language Learners.

Documentation of any assessment completed must be done in compliance with the Basic Skills Deficiency Assessment policy and the Service Documentation (Case Management) and Case Note sections of the Career Planning policy. Any assessment given must be recorded in the career planning system (Illinois Workforce Development System (IWDS) or Career Connect), documented on the Individual Employment Plan (IEP) or Individual Service Strategy (ISS) forms, and recorded in case notes. Case notes associated with assessments should incorporate what the assessment results mean, not just documentation of the test outcomes.

**Q3. *The assessment process requires a digital literacy assessment. Is this a new requirement? How will Career Planners document digital literacy? Is this another test that we will make the job seeker take?***

Yes, digital literacy is a new requirement. Digital Literacy is “the ability to use information and communication technologies to find, evaluate, create, and communicate information, requiring both cognitive and technical skills.”

The ability to use information and communication technologies is the foundation to occupation-specific skills and needed for reskilling workers. While, the concern over the lack of access to digital skills has been growing, addressing it became vital during the pandemic.

A digital literacy assessment may consist of an evaluation of the participant’s basic computer skills, internet knowledge, the use of email, any software (e.g., Microsoft Word, Google Docs, etc.) in which the participant feels proficient, and how they use technology such as social media in daily life. This doesn’t have to be done in a formalized “test” and may be done through interviews or intake questionnaires when looking at transferrable skills. The participant’s level of digital literacy may necessitate a basic computer course so that they can successfully complete their employment goals and/or training.

Assessments include an informal and formal component. The informal component includes one-on-one interaction between the participant and the Career Planner as well as observations made by the Career Planner. The formal component includes a basic skills screening to determine priority of service and then completion of the assessment process described in the Career Planning section of the policy manual.

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Both components must be recorded in the Illinois Workforce Development System (IWDS).

The Assessment Summary screen in IWDS has entries for Narratives, Tests, Employment Goals, and the Income & Expense Worksheet. All entries must be recorded following the Basic Skill Deficiency Assessments policy.

Procedures related to entry of assessments into the Career Connect case management system can be found in the Resources section of the Basic Skills Deficiency Assessment policy as well as here - [Procedures – Chicago Cook Workforce Partnership \(zendesk.com\)](#).

**Q4. *How do Career Planners interpret what the TABE 11/12 reading and math assessment results mean especially when almost everyone tests basic skills deficient (BSD)?***

A scale score is only a description of a participant's performance on a particular test at a particular point in time. Therefore, it makes sense that one should use caution in placing too much emphasis on one test score to reflect that person's true ability.

The TABE 11/12 has five separate levels of difficulty (Literacy, Easy, Medium, Difficult and Advanced). How well the participant has done will be determined by how close they are to the average score for their specific level.

If, for example, a participant tested in the Easy range and their score was way above the average, that is a very clear indication that they should move on to higher levels. If they go on to take the Medium level test and score just below the average, then that is the appropriate level.

More importantly the test is a way to identify the participant's strengths and weaknesses across a range of subjects which assists career planners in determining if additional assistance is needed at a level that is suitable for the participant.

For instance, if a youth scores poorly, it may be because they experience anxiety when taking tests. The career planner can then tailor services around the participant's learning needs and determine that tutoring is a suitable service for the participant prior to being enrolled into a training program.

These observations and insights must be entered into the assessment narrative and will contribute in developing the Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

**MONITORING**

**Q1. *Please provide further clarification on what appropriate/relevant documentation means so the correct information can be uploaded? Does this information need to be uploaded for all participants?***

In the era of the COVID pandemic we are finding ourselves having to do things differently. This includes remote fiscal and programmatic monitoring. Appropriate/relevant documentation can

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be various types of information tied to monitoring or data validation purposes. An example would be a participant's eligibility documentation. If in doubt, upload any documentation that would assist both federal and state monitors in telling the story of the individual and the services they are receiving. Additional instructions regarding the documents that are required to be uploaded will be provided by the monitoring team.

**Q2. *Are all participant files required to be uploaded, or is this only for monitoring and data validation?***

All participant files are not required to be uploaded. Monitoring and data validation are to be done by a selection of participants. Since the Illinois Workforce Development System (IWDS) has the capability to upload files, it should become standard practice to upload the relevant documents for monitoring and data validation.

**Q3. *Career planners are to upload all relevant documentation contained in the participant's physical case file into the appropriate case management system for remote monitoring and data validation purposes? Is there going to be a feature in the individual participant screens in Illinois Workforce Development System (IWDS) that allows for this, and are local areas going to be provided with the equipment/processes to upload documents? Can local staff other than Career Planners upload documents?***

Yes, this is referencing the Department of Commerce and Economic Opportunity's Office of Employment and Training (OET) monitoring upload process provided during monitoring. The Illinois Workforce Development System (IWDS) allows for the upload to be completed in the participant's Application Menu. At this time only those participants that have been selected as part of monitoring and data validation by the State and the U.S. Department of Labor (DOL), will need to have their files uploaded into IWDS. The policy text will be revised.

The state policy uses the term "Career Planner" as a general term. The Local Workforce Innovation Board (LWIB) / Local Workforce Innovation Area (LWIA) can assign a staff person other than the career planner to upload documents.

**ONE-STOP OPERATORS ROLE**

**Q1. *The draft policy states: "One Stop Operators (OSOs) create an operation manual that outlines career planning best practices". This is not the role of the OSO. The OSO is a higher-level strategic thinker for the One-Stop system, so this section is outside of their scope of work. Shouldn't this statement be altered?***

The Department of Commerce and Economic Opportunity's Office of Employment and Training (OET) agrees that the minimum requirement of a One-Stop Operator (OSO) does not include creating an operation manual that outlines career planning best practices; however, the OSO must ensure coordination of services through service integration. The creation of a manual would be a logical step in that endeavor, but it is not mandated. Therefore, we will revise the language in the final policy to reflect that.