

ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Program Name: Vocational Rehabilitation (VR)

Policy Number: VR-4.3-v4

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CHAPTER 4: Individualized Plan for Employment

Section 4.3: IPE Development

I. Policy Statement

This policy provides guidelines for Individualized Plan for Employment (IPE) as an integral part of the VR process. The IPE is continuously developed throughout the life of the VR case.

II. Authority

Authority for policies contained in this document includes the following:

- Workforce Innovation and Opportunity Act (WIOA), 29 U.S.C. § 3101 et seq.
- Title IV Amendments to the Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq.
- State Vocational Rehabilitation Services Program, 34 C.F.R. §§:
 - Development of the individualized plan for employment 34 CFR 361.45(a-f)
 - Content of the individualized plan for employment 34 CFR 361.46(a)
- A.R.S. §§ 23-502 and 503
- Arizona Administrative Code, Title 6, Chapter 4, Individualized written rehabilitation program R6-4-205
- Technical Assistance Circular, RSA-TAC-22-03, Prohibition Against Applying Financial Needs Tests or Requiring Cost Participation as a Condition for the Receipt of Vocational Rehabilitation Services for SSI and SSDI Recipients

III. Applicability

This applies to circumstances in which an IPE must be developed in order for clients to progress in the Vocational Rehabilitation program. The client must:

- A. Develop their IPE on their own or with assistance from a:
1. VR Counselor employed by VR,
 2. VR Counselor not employed by VR,
 3. Disability advocacy organization, or

4. Other resources helpful to the client's IPE development.
- B. Choose an IPE specific employment outcome using labor market information.
- C. Choose an IPE specific employment outcome in a competitive and integrated setting.
- D. Make consistent progress toward achievement of the intermediate objectives and employment outcome.
- E. Apply and secure comparable benefits and services when appropriate.
- F. Maintain active participation in VR services.

In instances when a client wants to develop an IPE on their own, the client must:

- A. Submit the following information to the VR Counselor using the format of their choice:
 1. The chosen employment goal.
 2. Services that address disability-related barriers and/or the skills gap and are necessary for the achievement of the employment goal.
 3. Intermediate objectives (steps) to be completed in order to achieve the employment goal.
 4. Estimated timeframe for completing the intermediate objectives.

IV. Standards

- A. VR Counselor must provide clients with:
 1. Accommodations and information necessary to exercise informed choice in accordance with VR policy section 1.5 throughout the IPE process.
 2. Information on disability benefits and/or community referral for clients with Supplemental Security Income/Social Security Disability Income (SSI/SSDI) benefits regarding the potential impact employment income may have on their benefits.
 3. The IPE FAQ and Appeal Rights information prior to IPE development.
- B. The agency IPE form must be utilized regardless of the chosen option for IPE development as per III. A(1-4) above to include all the components stated in IV. G and J-N of this section.
- C. The VR Counselor must utilize existing or new information to assess the client's work history, vocational interests, current skills, education, disability-related barriers to employment, financial outcomes, and vocational/educational potential to assist in developing and finalizing the IPE.

- D. VR services may be provided during the development of the IPE when it is determined necessary to gather information regarding the client's rehabilitation needs and to identify an appropriate employment outcome.
- E. The VR Counselor must inform the client that economic need is determined prior to the provision of any service that is contingent upon economic need.
- F. In circumstances when the client is a SSI or SSDI recipient, the VR Counselor must inform the client that they are not responsible for the cost of VR services listed in the IPE.
- G. The Economic Status Report and IPE WIOA Documentation must be completed in the ECF prior to opening the IPE.
- H. Economic Need must be determined prior to the provision of any service that is contingent upon economic need.
- I. The IPE must contain the following elements:
 - 1. Selection of IPE plan type: Vocational Rehabilitation, Supported Employment, Self-Employment, or Job Retention,
 - 2. Employment outcome to be achieved by the client,
 - 3. Intermediate objectives to be completed by the client to achieve the employment outcome,
 - 4. Estimated timelines for the initiation and completion of services,
 - 5. Criteria to be used to evaluate the progress towards the achievement of listed objectives,
 - 6. Responsibilities of either party,
 - 7. Services necessary to complete the intermediate objectives,
 - 8. Selection of service providers and method of procurement, and
 - 9. Any post-employment services as necessary.
- J. All services listed in the IPE must be directly related to achieving the intermediate objectives.
- K. The VR Counselor must assist the client in identifying an employment goal in a competitive, integrated employment setting that is achievable within specific timelines.
- L. The employment goal/outcome must demonstrate strong local growth as supported by labor market information (LMI) data.
- M. The specific employment outcome established in the IPE must be chosen by the client and agreed by a VR Counselor that is consistent with the client's strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

- N. Intermediate objectives must address the following:
1. The major steps that will be taken to address disability-related barriers to employment and current skill gaps to achieve the identified employment outcome,
 2. The order in which the objectives will be completed,
 3. Timeframes for completion of the objectives,
 4. How progress toward completion of the objective will be measured, and
 5. The who, what, when, and why of the objective.
- O. The following documents may be included to support the intermediate objectives and services listed in the IPE:
1. Client Purchase Agreement
 2. ICA Special Fund Plan
 3. Impairment Related Work Expenses (IRWE) Plan
 4. Labor Market Survey
 5. Plan for Achieving Self Support (PASS)
 6. Technology Profile/Assistive Technology Plan
 7. Vehicle Modification Packet (if applicable)
 8. Equipment Contract with Client
 9. Identifying a Job or Career Goal
 10. Informational Interviewing
 11. Self-Employment/Self-Assessment Inventory
 12. Plan of Study
 13. Transportation Worksheet
- P. Services on every IPE must include:
1. Vocational Rehabilitation Counseling and Guidance provided by Arizona State Agency personnel,
 2. Services determined to be necessary through informal or formal assessment of existing or new information to address disability-related barriers to the identified employment outcome.
 3. Services determined through research of the labor market/industry standards/employment outcome requirements to be necessary to address the skill gap between the client's current skills and the skills required to achieve the employment outcome, and

4. Support Services determined to be necessary to enable the client to participate in approved VR services.
- Q. IPEs for SSI/SSDI recipients must also include the service category of Information/Referral-Benefits Counseling provided by the Arizona State Agency.
- R. VR Counselor must refer the client to research available job options in the client's geographical area in order to identify and utilize employment resources such as ARIZONA@WORK Job Centers, self-employment resources (e.g., Small Business Administration (www.sba.gov); Small Business Development Centers (<http://www.azsbc.net/>), SCORE (<https://greaterphoenix.score.org/>).
- S. The specific employment outcome established in the IPE must not be:
1. Illegal by the state or federal government,
 2. A hobby venture,
 3. Related to nudity, sex or sexual appeal, or
 4. Inconsistent with DES and VR's mission, vision statements, and values.
- T. VR Counselor must use the Eligibility Decision Worksheet (EDW) and any informal or informal assessment(s) to address the client's disability related needs to provide justification for services related to the intermediate objectives.
- U. The IPE Justification template must be completed and include the following details to support the employment outcome:
1. Detailed Labor Market Survey,
 2. Explanation for how each service addresses the client's disability related needs as outlined on the EDW and expected outcome,
 3. Justification for not addressing any barriers identified on the EDW,
 4. Explanation of identified and utilized comparable benefits including if any are available but cannot be used,
 5. Explanation of why any planned services may exceed the general average level and length of time,
 6. Rationale for high agency cost in the excess of \$10,000,
 7. How the client exercised informed choice during IPE development, and
 8. Outcome of Economic Need decision.
 9. Research results or notes (if any) from the client utilizing informational interviewing, career exploration, job shadowing, volunteering, etc.
- V. In instances when the source of Extended Services is not yet identified for the Supported Employment IPE, the IPE Justification must include the basis for concluding a reasonable expectation that the source will later become available.

- W. The VR Counselor must provide the client with the RSA Decision letter with Appeal Rights when the client's chosen employment outcome, services or service providers are not supported.
- X. The VR Counselor is responsible for maintaining contact with the client and following through with the planning and authorization of approved services in a timely manner as not to delay client progress.

V. Procedure

- A. Refer to section IV, B through Q above.
- B. Refer to Standard Work (if available).
- C. Refer to RSA Allowable Services spreadsheet, contracts (if available), and provider requirements.
- D. For Supported Employment IPE development, refer to Section 4.4 of this manual.
- E. For Self-Employment IPE development, refer to Section 4.5 of this manual.
- F. For Job Retention IPE development, refer to Section 4.8 of this manual.

VI. Documentation Requirements

The client's electronic case file must include the following:

- A. Completed IPE and supporting documents referred in Section IV, M of this policy.
- B. Completed IPE Justification template.
- C. Completed and signed Economic Status Report.
- D. Financial documentation supporting the economic need determination, unless the client waived their right to have their need determined.
- E. All results from formal and informal assessments.
- F. Reports from service provider(s).