



**Subject: Case Note Policy**

**Policy No: 2015-14**

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**1. Purpose:**

The Workforce Innovation and Opportunity Act (WIOA) adheres to a case management approach to service delivery. The maintenance of comprehensive case notes for each program participant is essential to this approach. The purpose of this policy is to provide guidance for case note documentation when service providers are providing case management services to WIOA Title I program participants.

**2. Background:**

Case notes are critical functions that provide evidence of services and activities provided to participants while enrolled in WIOA activities as well as compliance with federal, state, and local laws and policies.

## **Policy & Procedure**

### **A. Purpose**

Case notes are intended to document the on-going delivery of case management services to program participants. They justify the decision to utilize WIOA funds and give a complete and accurate record of the case management services provided, the reasons behind decisions made and actions taken, the expected results and actual outcomes. Case notes should be written so the reader can follow the story of why the participant was enrolled, services planned, services provided and current status of the participant. Information should be relevant to the goals of each participant and must be factual and not contain opinions, judgmental statements or diagnoses.

Program staff must maintain a written record of communication with participants from the date of enrollment through the follow-up period (if applicable). Case management services are two-way exchanges between program staff and the participant. Each contact must be documented in case notes, identify the type of contact with the participant and recorded as soon as the information is obtained and/or services are provided. The method of communication should include a combination of desk-side appointments, phone calls, letters, e-mails, etc.

### **B. Frequency of Case Note Documentation**

The frequency of case note documentation is determined by the intensity of the service delivery plan. Case note documentation should occur at a minimum of once every 30 days, but the Benton-Franklin Workforce Development Council (BFWDC) encourages contact at least every two weeks. If there has been a lack of regular participant contact, the reason must be documented.

### **C. Case Note Documentation**

Case notes must be recorded into the state management information system, Efforts to Outcome (ETO) and should provide substantial detail about the participant's eligibility, services planned, services provided, and service outcomes. All communication between the program staff and the participant must be recorded as soon as the information is obtained and/or services are provided. If case note documentation cannot be entered at the time it occurs, it must be entered within 14 calendar days of the actual date of communication. After 14 days, the program manager may approve the late entry of a case note if program staff can provide documentation to verify the date communication occurred.

At a minimum, case notes should document the following information as it applies to each participant.

1. Program eligibility determination and/or enrollment case notes should document:
  - How the participant meets WIOA program eligibility criteria and how the participant will benefit from WIOA services.

- The participant's career goals, the strategy for reaching those goals, available resources, and the services that will be provided. Describe how each activity will build on the participant's strengths.
  - Participant's desired occupational goal is in-demand as confirmed by labor market information.
  - The participant's needs should be clearly explained, by gathering information from intake, interviews and the objective assessment.
  - Identify all of the participant's barriers and document whether or not they will affect the participants desired goals.
  - If a self-attestation form is used to document eligibility, the case note must clearly state why other forms of acceptable documentation are not available.
  - **Youth Only:** Participants have been informed of follow-up services.
2. Co-enrollment case notes should document:
- Justification for the concurrent enrollment.
  - Coordination between programs to identify the services to be provided by each program at the time the actual need arises.
  - It must be clear at all times what services are being provided and by whom.
3. The Individual Employment Plan (IEP) and Individual Service Strategy (ISS) case notes should document:
- Progress in meeting objectives, changes in training/educational/support service needs or employment goals, accomplishments and setbacks.
  - All modifications to the IEP/ISS must be documented in case notes, explaining why the modification occurred.
4. Supportive service case notes should document:
- Participant's request for supportive services prior to the participant actually incurring the expenditure.
  - Justification for the requested service, stating the reason services are necessary to participate in WIOA activities.
  - The program staff efforts to use other community resources before WIOA supportive service dollars were authorized.
  - The amount of supportive services requested.
5. Assessment case notes should document:
- The type of assessment used to assist in determining the participant's educational, employment and training goals.
  - Discussion of assessment results with the participant.
6. Job search assistance case notes should document:
- Resume assistance provided.
  - Referrals/attendance to WorkSource workshops.
  - Job referrals relevant to the participant's goals of employment.
  - Participants job search efforts.
  - Interview outcomes.

7. Occupational Skills Training services case notes should document:

- An assessment must be taken prior to the expenditure of training funds and results discussed with the participant. Documentation should address whether or not the assessment results indicate the participant has the skills and qualifications to successfully participate in training. A list of exceptions for not administering an assessment can be found in Assessment Policy 2015-09, Section E. Exceptions.
- Participant's desired occupational goal is in demand as confirmed by labor market information.
- Case notes should explain the method of funding the training and the availability of other sources of grants to pay for training costs such as Temporary Assistance for Needy Families (TANF), State-funded training funds, and Federal Pell-Grants, so that WIOA funds supplement other sources of training grants.
- Justification for the requested training and the reason the service is needed.
- The date training is scheduled to start/end.
- Training progress and updates (e.g., attendance, grades, challenges, and successes).
- The date participant withdrew from training (if applicable). Document whether or not there will be a reimbursement from the training provider for WIOA training funds expended.
- The date measurable skill gain was achieved and type of measurable skill gain. For examples of types of measurable skill gains, see Program Notice-2 Measurable Skill Gains.

8. On-the-Job Training (OJT)/ Work Experience (WEX) case notes should document:

- Outreach efforts utilized to develop OJT/WEX opportunities with potential employers.
- Justification for the requested OJT/WEX and the reason the service is needed.
- The start/end date for OJT/WEX, name of the employer and participant's job title.
- A minimum of one on-site visit is required during the OJT/WEX agreement period in conjunction with ongoing discussions with the participant and employer addressing the participant's progress, and any challenges or issues identified by the employer with the resulting plan of action.
- The reason a participant exits an OJT/WEX prior to the anticipated completion date. Case notes should reflect the reason for the early termination from the participant's perspective, as well as information received from the employer to develop the next steps in the participant's employment plan.
- **Youth Only:** Academic and Occupational Education component. Case notes should reflect the contextual learning that accompanies a work experience.
- OJT's must document the date measurable skill gain was achieved and type of measurable skill gain. For examples of types of measurable skill gains, see PN-2 Measurable Skill Gains.

9. Short-Term Pre-Vocational Services/Workforce Preparation case notes should document:

- Justification for the requested service, stating the reason services are necessary.
- The program staff's efforts to utilize other community resources before WIOA supportive service dollars were authorized.
- The name of the service provider.
- Start/end dates and outcome.

10. Exit case notes should document:

- The reason for exit.
- Services provided, and outcomes attained while in the program.
- Employment information, if applicable (e.g., employer, job title, wages, hours worked per week, etc.).
- The reason follow-up services are not planned, including but not limited to:
  - a. Institutionalized
  - b. Health/medical or family care
  - c. Deceased
  - d. Reserved forces called to active duty
  - e. Relocated to a mandatory program
  - f. The participant declines follow up services
  - g. The participant is unreachable, refuses to divulge information, or has relocated out of the state with no intention of returning.

11. Follow-up case notes should document:

- Assistance in securing better paying jobs.
- Additional career planning and counseling.
- Assistance with work-related problems.
- Information about additional educational or employment opportunities.
- Referral to other community services.
- Post-program supportive services (youth only).
- Post-exit credentials and quarterly employment updates.

#### **D. Additional Communication**

1. ESD Policy 1020 states case notes should support and not contradict service entries. Case notes should not be entered to represent service delivery without also entering a qualifying service from the service catalog.
2. Case notes that refer to voice or email messages left for or sent to participants only represent the intent to provide services as opposed to the actual provision of services.
3. A case note must be entered when a referral is given, listing the referral agency and why the referral is given.
4. A case note must be entered when a pre or post-test is given. The case note should detail the type of test (pre or post) and if gains were earned.
5. An issue mentioned in one case note should be followed-up with other case notes. It should be clear if the issue was resolved, if the participant received a service or if the problem has deteriorated, etc. When issues arise, program

staff should make every effort to schedule a deskside appointment with the participant to discuss the situation and identify a plan of action/resolution.

## **E. Additional Considerations**

- Information contained in case notes belongs to participants.
- Case notes are legal documents that may be subpoenaed by the courts or disclosed through public records requests.
- Case notes are also used to represent the local WIOA Title I activities and their compliance with federal, state, and local policies.
- Participant files and case notes are subject to monitoring and data validation reviews.

## **F. Confidentiality**

Medical and disability-related information must be redacted from case notes and placed in a secured file cabinet, separate and apart from active case files. Medical and disability files must be separate from all other confidential information. Access to the secured file cabinet containing medical/disability information will be limited to the WIOA Programs Manager and their assigned designee. When the participant exits the program, medical and disability-related information must be placed in a sealed envelope marked "Medical and Disability Information" and then must be secured with the participant's program file.

It is possible to record relevant information without documenting actual medical or disability-related information. Below are examples of information that are not considered medical or disability-related for the purpose of securing and maintaining confidential information. The participant:

- cannot lift more than 20 pounds
- is unable to sit for more than an hour
- must take frequent breaks or must take breaks at least every hour
- must be located in a quiet room with few interruptions
- cannot drive in mornings until 9 a.m.
- will be unavailable during the next six weeks; etc.
- is pregnant

Below are examples of information that are considered medical/disability information and must be secured. The participant has:

- a herniated disk
- stage 2 abdominal cancer
- crohn's disease
- hypertension
- diabetes
- a fractured tibia
- mild depression; etc.