Subject: Case Note Policy

Policy No: 2015-14
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Purpose: To communicate guidance for case note documentation to subrecipients utilizing a case management approach to service delivery. Maintaining comprehensive case notes for each program participant is essential to this approach.

Background: Case notes are critical functions that provide evidence of services and activities provided to participants while enrolled in program activities and ensure compliance with federal, state, and local laws and policies.

Operational Procedure

A. Policy

Recording case notes is critical because it weaves each service element into a customer-focused case management approach. Case notes are intended to document the ongoing delivery of case management services to program participants. They justify utilizing the Workforce Innovation and Opportunity Act (WIOA) and discretionary 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. The subrecipient shall record case notes so the reader can follow the story of why the participant was enrolled, services planned, services provided, and the participant's status. Information shall be relevant to the goals of each participant and shall be factual and not contain opinions, judgmental statements, or diagnoses.

Case notes are a tool to help subrecipient staff organize and analyze the information gathered on participants and to plan case management strategies. Case noting provides an opportunity for a greater emphasis on customer-focused and effective case management. Integral to this approach is utilizing multiple techniques to address and offer solutions to various barriers and assess the needs of participants.

Subrecipient staff shall 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 subrecipient staff and the participant. Each contact shall be documented in case notes, identify the type of contact with the participant, and recorded as soon as the information is obtained and services are provided. The method of communication shall include a combination of deskside appointments, phone calls, letters, emails, virtual forums, etc.

B. Frequency of Case Note Documentation

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

C. Case Note Documentation

Case notes shall be recorded in the State Management Information System (MIS) and provide substantial detail about the participant's eligibility, services planned, services provided, and service outcomes. All communication between subrecipient staff and the participant shall be entered at the point in time the services are delivered. If case note documentation cannot be entered when it occurs, it shall be entered within 14 calendar days of the actual date of the service/communication. After fourteen (14) days, the subrecipient's Department Head may approve the late entry of a case note if subrecipient staff can provide documentation to verify the date communication occurred.

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

1. Program eligibility determination and enrollment case notes shall document the following:
    - How the participant meets program eligibility criteria and how the participant will benefit from services;
    - The participant's career goals, the strategy for reaching those goals, available resources, the services to be provided, and describe how each activity will build on the participant's strengths;
    - How the participant's desired occupational goal is in demand as confirmed by labor market information;
    - The participant's needs are clearly explained by information gathered from intake, interviews, and the objective assessment;
    - All of the participant's barriers and if they will affect the participant's desired goals;
    - The reason a self-attestation form is used to document eligibility and why other forms of acceptable documentation are not available.

2. Co-enrollment case notes shall document the following:
    - Justification for the concurrent enrollment;
    - Coordination between programs to identify the services to be provided by each program.

3. The Individual Employment Plan (IEP) and Individual Service Strategy (ISS) case notes shall document the following:
    - Progress in meeting objectives, changes in training, educational, support service needs, employment goals, accomplishments, and setbacks;
    - All modifications to the IEP/ISS, and explain why the modification occurred;
    - Links to one or more performance indicators.

4. Supportive service case notes shall document the following:
    - The participant's request for supportive services before the participant incurs the expenditure;
    - Justification for the requested service, stating the reason services are necessary to participate in program activities;
    - Efforts to use other community resources before WIOA and discretionary supportive service dollars are authorized;
    - The requested supportive service amount.

5. Assessment case notes shall document the following:
    - The type of assessment used to assist in determining the participant's educational, employment, and training goals;

- The discussion of assessment results with the participant.

6. Job search assistance case notes shall document the following:
    - Resume assistance provided;
    - Job referrals relevant to the participant's goals of employment;
    - The participant's job search efforts;
    - Interview outcomes.

7. Occupational Skills Training case notes shall document the following:
    - A comprehensive assessment, such as an intake interview, evaluation, or standardized test, was completed before the expenditure of training funds, and the results were discussed with the participant.
    - If the comprehensive assessment results indicate, the participant has the skills and qualifications to participate in training successfully.
    - A list of exceptions for not administering an assessment can be found in the BFWDC ITA Policy 2015-04, Section D Assessments before Training.
    - How the participant's desired occupational goal is linked to in-demand employment opportunities as confirmed by Labor Market Information (LMI);
    - The Eligible Training Provider List (ETPL) was made available to the participant (as documented in case notes or the Individual Training Account (ITA));
    - The method of funding 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 and discretionary 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 and end;
    - Evidence of the participant's satisfactory progress in training (e.g., transcripts, report cards, progress reports showing skills gained, certificate, etc.);
    - Evidence obtained to validate training outcome and date of outcome;
    - The date the participant withdrew from training (if applicable);
    - An explanation if there will be a reimbursement from the training provider for WIOA and discretionary training funds expended;
    - The date and type of measurable skill gain achieved.
        - For examples of types of measurable skill gains, see the local [Measurable Skills Gains Policy 2021-02.]

8. On-the-Job Training (OJT)/ Work Experience (WEX) case notes shall document the following:
    - 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 and end date for OJT/WEX, name of the employer, and participant's job title;
- A minimum of one on-site visit 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 before the anticipated completion date from the participant's perspective, as well as the information received from the employer to develop the next steps in the participant's employment plan;
- The date and type of measurable skill gain achieved for an OJT;
  - For examples of types of measurable skill gains, see local Measurable Skills Gains Policy 2021-02;
- The required Academic and Occupational Education component for youth WEXs and the contextual learning accompanying a work experience.

9. Workforce Preparation Service case notes shall document the following:
   - Justification for the requested service, stating the reason services are necessary
   - Subrecipient's efforts to utilize other community resources before WIOA and discretionary funds are authorized;
   - The name of the service provider;
   - Start, end dates, and outcomes.

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10. Hold-Gap in service (Individualized/Training) case notes shall document:
    - The service is being used to accommodate the start date for training or other educational services and document the planned start date;
    - An initial hold status of up to 90 consecutive calendar days, with the option to extend an additional 90 consecutive calendar days, not to exceed 180 consecutive calendar days.

11. Exit case notes shall document the following:
    - The reason for exit;
    - The services provided and outcomes attained while in the program;
    - Employment information, if applicable;
    - The reason follow-up services are not planned including but are not limited to:
      - Institutionalized;
      - Health/medical or family care;
      - Deceased;
      - Reserved forces called to active duty;
      - Relocated to a mandatory program;
      - The participant declines follow-up services;
      - The participant is unreachable, refuses to divulge information, or has relocated out of the state with no intention of returning.

12. Follow-up case notes shall document the following:
    - 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;
    - Post-exit credentials and quarterly employment updates.

D. Additional Communication

1. ESD Policy 1020, Rev 1 states case notes shall support and not contradict service entries. Case notes shall not be recorded to represent service delivery without 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 instead of the actual provision of services.
3. A case note shall be recorded when a referral is given, listing the referral agency and why the referral is given.
4. A case note shall be recorded when a pre or post-test is given. The case note shall detail the type of test (pre or post) and if gains were earned.
5. An issue mentioned in one case note shall be followed-up with additional case notes to document if the issue was resolved, if the participant received a service or if the problem deteriorated, etc. When issues arise, subrecipient staff shall make every effort to schedule a deskside appointment with the participant to discuss the situation and identify a plan of action and resolution.

E. Additional Considerations

1. Information contained in case notes belongs to participants.
2. Case notes are legal documents that may be subpoenaed by the courts or disclosed through public records requests.
3. Case notes represent the local program activities and their compliance with federal, state, and local policies.
4. Participant files and case notes are subject to monitoring and Data Element Validation reviews.

F. Confidentiality

Medical and disability-related information shall be redacted from case notes and placed in a secured file cabinet, separate and apart from active case files. Medical and disability files shall be separate from all other confidential information. Access to the secured file cabinet containing medical/disability information will be limited to the Programs Manager and their assigned designee. When the participant exits the program, medical and disability-related information shall be placed in a sealed envelope marked “Medical and Disability Information” and 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 to secure and maintain confidential information. The participant:

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

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

- a herniated disk;
- stage 2 abdominal cancer;
- Crohn’s disease;
- Hypertension;
- Diabetes;
- a fractured tibia;
- Mild depression, etc.

G. References

- Data Integrity and Performance Policy and Handbook; Policy Number: 1020, Revision 1
- Data Integrity and Performance Policy and Handbook State Policy-Attachment A
- WIN0082 Real-Time Data Entry in the Efforts to Outcomes (ETO) System
- 2023-02 Management of Medical and Disability-Related Information Policy