



**Workforce
Development
Council**

**Benton-Franklin Workforce Development Council
Workforce Innovation and Opportunity Act (WIOA)**

**Subject: Case Note Policy
Policy No: 2015-14
Effective Date: 07/26/2016
Revision: 01/05/2017, 03/09/2017**

1. Purpose:

The Workforce Innovation and Opportunity Act adheres to a case management approach to service delivery. Integral to this approach is the maintenance of comprehensive case notes for each program participant. The purpose of this policy is to provide guidance for case note documentation when service providers are providing case management services to WIOA 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. They should describe how the participant will benefit from WIOA services.

Information contained in case notes should be relevant to the goals of each participant. Case notes must be factual and not contain opinions, judgmental statements or diagnoses.

Service providers must maintain a written record of communication with participants from the date of enrollment through the follow-up period (if applicable). Each contact must be documented in the participant's case notes and should be entered as soon as the information is obtained and/or services provided. The method of communication should be the method that is most convenient and unobtrusive to the participant (e.g., In-person, phone call, letter, e-mail).

B. Frequency of Case Note Documentation

The frequency of case note documentation is determined by the intensity of the service delivery plan. While the minimum expectation for case note documentation is once every 30 days, the WDC 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

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 education and 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 the participant is co-enrolled into another program, case note must document the justification for the concurrent enrollment and

document the coordination between programs for services provided.

- If a self-attestation form is used to document eligibility, the case note must clearly state why and what it is being used for.
2. The Individual Employment Plan (IEP) case notes should document:
 - Progress in meeting objectives, changes in training/educational needs or employment goals, accomplishments and setbacks.
 - All modifications to the IEP must be documented in case notes, explaining why the modification occurred.
 3. 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 for the participant to participate in WIOA activities.
 - The services provider's efforts to use other community resources before WIOA supportive service dollars were authorized.
 - The amount of supportive services provided.
 4. Assessment case notes should document:
 - Descriptions and results of assessments used that determined the participant's employment and training plan.
 5. Job search 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.
 6. Training service case notes should document:
 - Participant's desired occupational goal is in demand as confirmed by labor market information.
 - Case notes should explain the method of funding the training. 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.
 - Training start date.
 - Training progress and updates (e.g., attendance, grades, challenges, successes).
 - Date training was completed and outcome. Must document when a certificate, credential, degree, diploma or General Education Development (GED) is attained.

7. On-the-Job Training (OJT)/ Work Experience (WEX) case notes should document:
 - Outreach efforts utilized to develop OJT/WEX opportunities with potential employers.
 - Start and end dates.
 - The name of the employer.
 - The participant's job title.
 - When site visits are conducted, they should document participant's progress, 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.

8. Short-Term Pre-Vocational Services case notes should document:
 - Justification for the requested service, stating the reason services are necessary.
 - The services provider's efforts to use other community resources before WIOA supportive service dollars were authorized.
 - The name of the service provider.
 - Service start date and date service was completed/outcome.

9. 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).
 - 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

10. 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. A case note must be entered when a referral is given, listing the referral agency and why the referral is given.
2. 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.
3. An issue mentioned in one case note should be followed-up with other case notes. It should be clear if the problem was resolved, if the participant received a service, and if the problem has worsened, etc. If a problem remains, the case note should identify a plan of action/resolution.

E. Confidentiality

Case notes that refer to criminal offender information should be placed in a file, separate and apart from the medical/disability related information.

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. Please note that medical and disability-related information should not be stored in staff desks.

When the participant exits the program, medical and disability-related information must be secured with the participant's 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.

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.

Benton-Franklin Workforce Development Council is an equal opportunity employer and provider of employment and training services. Free auxiliary aids and services are available upon request for individuals with disabilities. Language services for clients are provided free of charge. Washington Relay Services: 711