

Region 4 Workforce Development Board
Case Note and Case File Organization Policy-Adult

PURPOSE: The Workforce Innovation and Opportunity Act (WIOA) adheres to a case management approach to service delivery. Integral to this approach is the maintenance of comprehensive services for each program participant. Case notes are one of the comprehensive tools that document the participant's journey throughout the duration of the program. Case notes are used as a tool to help service providers organize and analyze the information gathered on participants and to plan case management strategies. Recording case notes is critical because it weaves each service element into a comprehensive service plan.

REFERENCES: DWD Memorandum: Interim Guidance on Eligibility and Data Validation, TEGL 10-16

CONTENT: This responsibility includes assuring:

- a. Information on a participant is reported accurately and timely in the Case Management system; and
- b. Proper documentation of the information is obtained and recorded in the Case Management system as part of the participant's records.

Reportable Individual:

A "**Reportable Individual**" is a new term defined in WIOA that applies across all programs. It is a person who has taken action that demonstrates an intent to use program services and who meets specific reporting criteria of the core program, including:

- Individuals providing identifying information.
- Individuals who use only self-service; and
- Individuals who only receive information on services or activities.

Source Documentation - Self-declaration is acceptable for **reportable individuals**.

If staff assisted information services provided, enter a case note of such acting

Participant:

A **participant** for Title I is an adult or dislocated worker who:

- Has been determined eligible, AND
- Has begun receiving a staff-assisted WIOA Title I adult/dislocated worker service other than Basic Career Services.

This is the point at which an individual is to be included in performance calculations for the primary indicators.

A participant for Wagner-Peyser is a reportable individual who received other than Basic Career services.

Source Documentation – See Data Validation Requirements (DEV) in DWD policy

Case Note Guidelines:

This policy sets expectations for the case file organization and the use of case notes to ensure sufficient details for all staff to serve any participant and for an accurate and complete record of all customer interactions and activities. Case files and case notes are subject to monitoring and data validation reviews.

Case note should be entered for all services entered in the Case Management system. You may also enter a case note to provide additional or updated information on a service previously entered.

Timeliness-Case note should be written in real time and entered in the Case Management system. The case note should be written every time something significant occurs with the participant (i.e. new test scores, job interview, a period of absence from the training program, supportive services, new program activities, etc.).

Concise and Clear- Case notes must be clear and easily understood. Someone with no contact with the participant should be able to read the case note and get an accurate picture of the participant. Good grammar and spelling should be used.

Consistency- There should not be gaps in either time or information. Case notes should reflect the participant's work and progress throughout their participation in the program. The case note and the rest of the file should match and reflect the same information as the test scores, start dates, revisions, supportive services, etc.

Legality- View case notes as a potential legal document. Case notes can and have been used as evidence in court. Ask yourself as you are writing, "would I want what I am writing to appear in court?"

Problems and Solutions- When documenting problems, also document solutions. For example, if you say "Participant not making progress", then also suggest what you are doing to remedy the situation. For example, "Participant not making adequate progress. I spoke to him about training. He will receive individual tutoring in math and language to see if the situation improves.

Things to Remember- Do not label your opinion and judgments as facts. Be specific. Avoid sweeping generalizations. Summarize confidential information rather than recording it in detail. Keep documentation focused on how events in participant's life will affect the plan.

Case Management system Case Notes

A case note shall be clear, concise and used to document any "significant" service; such as 1-on-1 counseling. Services can include comprehensive guidance and counseling, participation in group activities, phone contacts, or email exchanges. All case notes must be entered on a "real time basis" by the team member who provided the service.

Significant customer service would include all of the following:

- The first contact with a customer that results in their first service being received
- Contacts with a customer that involve the delivery of a specific service to that customer
- Contacts with a customer to assess their status or progress in an activity
- Contacts with a customer that produce new information affecting the delivery of services (examples would be changes in health status, court/legal problems, driver's license issues or changes in address).
- Case Notes cannot be edited. Once the case note has been saved, a new case note with reference to the case note you want changed will need to be entered.

I. Case Note Examples (see case note addendum)

A. Participants ICC Case Note

This case note is critical as it documents registration into WorkOne activities and as such will be reviewed during monitoring and data validation activities. This initial case note must have the following:

- State whether customer is employed, not employed, or employed but received noticed of termination or transitioning service member (necessary for data validation requirement)
- Indicate whether the customer was referred for further services- beyond Basic Services AND why
- If customer enters system through REACH, provide case note for WorkKeys assessment provided and scores.

The specific activities in which the customer is participating must be described in the case notes.

- Example: Provided TABE assessment (scores should be listed in test results), 1-1 interview to assess skill gaps and referred to Adult Basic Education provider for HSE, ESL, etc., scheduled for WorkKeys assessment. Include brief details for reason service is being provided.

B. ICC Case Note for Employer Job Development Contacts

This case note is required whenever an employer contact is made on behalf of a WorkOne customer. Such contacts should be for the purpose of assisting a customer in finding work with this particular employer. Each time this service is provided, the following information must be in the case note:

- Identify the specific employer(s) that were contacted on behalf of the customer

C. Case Note for Workshops or Group Activities

Many WorkOne services are delivered in group or workshop settings. When a customer participates in a workshop or group activity, information regarding the activity must be included in the case note.

- Example: Enter "Orientation of Service Overview"
- Briefly describe the purpose of the workshop or group activity

D. ICC Case Note for Individual Employment Plan (IEP) Planning and Update Activities

This case note is required each time that a customer participates in an IEP. *Customer should have an IEP when they are participating in Individualized Career and training level services.* All customers who are determined to need Individualized Career level services must have an initial IEP completed in ICC. For some customers this will mean filling out the majority of the plan; for others, it will mean filling out only certain sections. For training activities, a full IEP is required. This will include all activities in which updates or additions to IEPs are planned. Each time a customer participates in IEP activities, the following information must be documented in the case note:

- Describe the specific IEP planning activities in which the customer participated
- Describe the services that have been planned for the customer and how these services will help the customer achieve their employment goal
- The following are required when a customer is entered into any training activity:
 - State the employment goal
 - Describe the specific training schedule, including a beginning and end date
 - Identify the planned provider for each training activity
 - Describe the rationale for referring the customer for training services
 - Describe any planned investments that are expected

- Statement “This IEP has been jointly developed with the customer.”

E. ICC Case Note for Work Experience and Internship Services

This case note is required to document when a customer is participating in a paid or unpaid work experience or internship. For definitional purposes, a work experience or internship is an activity where a customer will learn job-specific skills (as well as basic work skills if necessary) while performing actual work for an employer. Each time that a customer participates in these services, the following information must be documented in the case note:

- Describe the specific internship activity in which the customer is participating, including the name of the employer and a quick review of the work to be performed
- Describe the specific skills that the customer is to acquire as a result of participating in the internship; and
- Describe how this work internship will help the customer attain their employment goal

F. ICC Case Note for Classroom and Occupational Skills Training Activities

Training activities covered include specific occupational training (must be on local occupations in demand list) programs at approved post-secondary training institutions, (must be on the Indiana Eligible Training Provider List without exception, which can be found at IN Training at <https://solutions.dwd.in.gov/INTraining/index.htm> .) Each time that a customer receives these services, a case note is required and must document the following information:

- Summarize why the customer is unable to obtain/retain employment with the services that have been provided (i.e., a review of the customer’s skills gap that is to be addressed through the training activity). Other barriers to employment should also be noted and should also include a sentence addressing the customer’s financial need
- Describe the specific training program the customer will be attending and the training institution that will deliver the training. Document, in the case note, and that the occupation is on the Occupations in Demand list. List can be found at <http://www.workonewestcentral.org/careers.cfm>, highlighted in blue.
- Record the Indiana Eligible Training Provider number
- Detail the status of any PELL grants and/or other sources of financial aid that is available to the customer. If the customer has selected training that is not PELL eligible, this fact should be documented
- Describe the skills that the customer is to acquire as a result of the training activity and how these skills will assist the customer in attaining their employment goal

G. ICC Case Note for On-the-Job (OJT) Activities:

OJT activities occur when an employer hires a customer and WorkOne funds are used to pay a percentage of the customer’s wages during the learning or training period. Each time that OJT activities are provided to a customer, a case note is required and should document the following information:

- Summarize why the customer is unable to obtain/retain employment with the services that have been provided (i.e., a review of the customer’s skills gap that is to be addressed through the training activity). Other barriers to employment should also be documented and should include a statement addressing the customer’s financial need.
- Document the OJT training program in which the customer is participating and the specific employer that will provide the OJT training; and
- Document the skills that the customer is to acquire as a result of the OJT activity and how these skills will assist the customer in attaining and retaining their employment goal.

H. ICC Case Notes for Supportive Service:

Support services are expenditure services that are designed to remove barriers that prevent customers from participating in training activities, job search activities or work activities and as such must be documented in a case note. Each time a customer is provided this service it must be documented in a case note that includes the following information:

- Document the customer's need for the support service, including the specific barrier that the support service will address
- Document the efforts made to secure the needed support service from other community organizations; and
- Document the specific support service that is to be provided
- Record the obligation amount in ICC attached to each support service (making sure an account is created in ICC)

I. ICC Case Notes for Partner Service:

Services that are provided to customers through a partner agency are required to be documented in a case note and must include the following information:

- Document the partner agency and the specific service that is being provided
- Document how these services will assist the customer in attaining their education or employment goal

J. Case Notes That Document or Update Customer Progress

As customers return, often there will be new or progress information that is obtained and this information must be documented in a case note and must include the following information:

- Briefly document any new information learned relative to the customer's progress in their learning, job search, work, or any other planned WorkOne activity

K. ICC Case Note when a Customer has Exited Open Activity

When an enrolled customer reports completion of the last day of service in an open activity, the customer must be exited from the activity and this exit must be documented in a case note that includes the following information:

- Document that the customer is no longer receiving this particular service and that the customer is being exited from this activity
- Document the customer outcomes from having been enrolled in this particular activity (e.g. employment, credentials)

L. ICC Case Note When Paper Files (for customers where funds have been expended) are Archived:

When an enrolled customer has received training or supportive services (when funds have been expended) and no service has been provided for 90 days, the file may be archived after follow-up when information from Management Information Team has been received.

The case note requires the Date of Archive in the case note.

II. Case File Organization for Occupational Skills Training and/or Supportive Service

Case files will be required for all individuals receiving occupational training, OJT's, Internship, offsite pre-vocational training and when supportive services are provided.

A clear and consistent approach will be used by all WorkOne staff in organizing the documentation of the case files to ensure eligibility and data validation requirements are met. Consistent organization of the case file will give each team member a clear picture of the activity and services provided and of the required documentation gathered.

All WorkOne West Central staff will use the case file format and the appropriate eligibility check list(s) as shown in attachment 'A' when individual receives training and/or supportive services that incur the use of one or more of the following funding streams - Adult, Dislocated Worker, TAA. All supporting documents must be gathered as shown in the appropriate check list.

A. Case Files are Required When a Customer Participates in:

- Occupational Skills training including On-the-Job Training, Work Experience & Internships
- Supportive Services including transportation assistance, automotive care and maintenance, child care assistance, work-related clothing and equipment, and certification and licensing fees.

B. Case Note Forms and Organization

- WorkOne staff will use appropriate eligibility check list(s) in Attachment "A" for the Adult, Dislocated Worker, or TAA services provided that incur the use of one or more funding streams. All supporting documents must be gathered as shown in the appropriate check list.

Effective Date: July 1, 2017

Attachment A

CASE FILE ORGANIZATION CHECK LIST	
Paper files will be kept for any customer that funds are expended on. This includes: SUPPORTIVE SERVICES, OCCUPATIONAL TRAINING, INTERNSHIPS, WORK EXPERIENCES, & ON-THE-JOB TRAINING SERVICES	
FILES ARE TO BE KEPT IN SECTION ORDER. EACH SECTION MUST HAVE A COVER SHEET TO MARK WHERE EACH SECTION BEGINS AND ENDS. A COPY OF A COMPLETED CHECK LIST MUST BE INCLUDED IN EACH FILE. MOST RECENT INFORMATION KEPT ON TOP.	
SECTION 1 – APPLICATION/ ELIGIBILITY VERIFICATION	
Visibly write Last Name, First Name and Social Security Number on File Folder Tab for easy reference	<input type="checkbox"/>
Signed application- Scanned into ICC	<input type="checkbox"/>
Signed EOE/Grievance Procedure as part of the application – Scanned into ICC	<input type="checkbox"/>
Citizenship/Eligible to Work - Scanned into ICC	<input type="checkbox"/>
Driver's License and Social Security Card – Scanned into ICC	<input type="checkbox"/>

Other acceptable identification document (specify) – Scanned into ICC	<input type="checkbox"/>
Selective Service information – Verified in ICC <u>and</u> Scanned documentation	<input type="checkbox"/>
TANF/Public Assistance – Scan documentation	<input type="checkbox"/>
Low Income verification for priority of service to Adults – scan documentation	<input type="checkbox"/>
Dislocated worker verification – (See DWD Eligibility & DEV guidance) – Scanned in ICC	<input type="checkbox"/>
Copy of applicant statement- when applicable if documentation is not available (See DWD Eligibility & DEV guidance) – Scanned in ICC	<input type="checkbox"/>
SECTION 2 – ASSESSMENT DOCUMENTS	
Work History – verify completed in ICC	<input type="checkbox"/>
Education History – verify completed in ICC	<input type="checkbox"/>
TABE, WorkKeys, Interest Surveys, (ICE system) results and/or reports – Copy in File/scanned or case note for WorkKeys scores.	<input type="checkbox"/>
Work Readiness Pre-Assessment/Post Assessment when applicable	<input type="checkbox"/>
Other Assessment information – copy or case note documentation	<input type="checkbox"/>
SECTION 3 – BUDGET INFORMATION	
Service Needs Analysis via ‘Financial Literacy’ Workshop and supporting documents – copy in file	<input type="checkbox"/>
Budget Worksheet and supporting documents when workshop not available – copy in file	<input type="checkbox"/>
Pell Grant Statement (PELL must be used prior to WIOA funds)	<input type="checkbox"/>

SECTION 4 – Individual Employment Plan (IEP)	
Verify Completed IEP in ICC	<input type="checkbox"/>
Statement about providing training for Occupations in Demand & Program number	<input type="checkbox"/>
Verify Case note documenting client agreement with IEP	<input type="checkbox"/>
Verify Program is WIOA approved is on INTraining Provider List – provide program # in case note	<input type="checkbox"/>
Drug Screen Results	<input type="checkbox"/>
	<input type="checkbox"/>
SECTION 5 – FISCAL INFORMATION – Scanned or copy in paper file	
Copy of documentation of estimated training costs and financial assistance from training institutions	<input type="checkbox"/>
Work Experience/OJT/Internships Paperwork:	<input type="checkbox"/>
Agreements , Time sheets	<input type="checkbox"/>
I-9	<input type="checkbox"/>
Tax Forms	<input type="checkbox"/>
Childcare agreement – if needed	<input type="checkbox"/>
Gas Card sign off sheets	<input type="checkbox"/>
SECTION 6 – ATTENDANCE	
Signed attendance reports for supportive services	<input type="checkbox"/>
Semester Grades and/or Transcripts	<input type="checkbox"/>
Copy of licenses/certifications/degrees	<input type="checkbox"/>
Copy of measurable skills gain documentation	<input type="checkbox"/>
SECTION 7 – FOLLOW UP	
Printed email correspondence – scan or copy in file	<input type="checkbox"/>
Pay Stubs or other documents	<input type="checkbox"/>
SECTION 8 – MISC	
Printed email correspondence – scan or copy in file	<input type="checkbox"/>
Other correspondence	<input type="checkbox"/>

Case Note policy addendum and additional guidance

Background: The WIOA Act is designed around a case management approach, and case notes are an essential component of effective case management practices. They are used to document and maintain information about clients, their progress, and the process and rationale for providing services to clients. Case notes provide information regarding the importance and value of services offered to clients and aid in evaluating and planning future services.

Purpose: Case notes serve a variety of purposes, such as justification, documentation, and record-keeping. There are five standard categories of case notes related to WIOA case management practices. These are:

- Customer demographic information;
- **Data element validation;** (case note must include the customer's barrier status, date information obtained and the case manager who obtained the information (See DWD Eligibility & DEV guidance)
- Program eligibility and enrollment;
- Service planning, entry and tracking; and
- Performance and outcomes.

The information contained in a case note and the format followed depends on the purpose of the case note and the type. In general case notes for an individual client should provide the following information:

- History and details of the individual's situation
- Activities planned or provided
- Appropriate reference to other case documents, including the Individual Employment Plan.
- Outcome of services provided

Additionally, case notes should record details of the individual's participation in WIOA activities, including:

Details of significant events in the individual's WIOA participation.

- The individual's participation in WIOA activities and progress removing barriers or progress toward goals.
- The individual's participation in non-WIOA programs or activities like adult education or other referral services and progress removing barriers or progress toward goals.
- The need for changes in the individual's IEP.

Information on contacts with the individual.

- Date and manner of the contact – face to face, individual or small group, phone call, text or instant message (IM).
- Purpose of the contact.
- Activities during the contact.
- Outcomes of the contact – actions taken, decisions made, and assignments of tasks for next steps.

Information on contacts with other WIOA or non-WIOA program staff.

- Name of the contact, position title, and agency represented.
- Date and manner of contact.
- Purpose of the contact, information provided, and description of outcomes of the contact.

What to Include in Case Notes

Case notes must be individualized and provide a complete, accurate, and concise explanation of frequency and type of contact with customers, as well as type of services provided and the outcomes associated with those services. Although services provided to participants are documented by entering information into ICC, additional information is needed so that another case manager to whom a case is transferred, or a program monitor reviewing services, will be able to understand the history of a case. Case notes should be written so that the reader has background information on the client, as well as the purpose of meetings, and where, why, and how contact took place.

In general, case notes resulting from interactions with the participant should include the following elements:

- Description of the context of the interaction (i.e. participant dropped by office after school, participant responded to case manager's request for meeting, etc.);
- Purpose of the interaction;
- Observations (appearance, seating, manner, etc);
- Content of the conversation;
- Outcome of the interaction (i.e. Was the purpose achieved? Were other objectives achieved?);
- Impression and assessment; and
- Plans for next steps or next meeting.

All conversations and events should be recorded in a case note as soon as possible after their occurrence. However, notes taken should not be recorded in the presence of the client.

What to Leave Out of Case Notes

In your case notes, you are not just representing yourself and your interactions with a participant. Case notes are legal documents that are also used to represent the local WIOA program and its compliance with federal, state, and local policies. Here are a few rules to follow to ensure that your case notes are objective rather than subjective observations:

- Record facts only – behaviors you observed and statements you heard; don't make a diagnosis.
- Record facts accurately and completely.
- Never include judgmental opinions, stereotypical comments, or any offensive statements. Don't make any comment you couldn't defend in a court of law.
- If you must state an opinion relevant to the individual's WIOA participation and progress, be sure to label your statement as an opinion.
- Use clear, simple, concise language, including professional terminology if appropriate.
- Don't use slang or street language, clichés, or jargon.
- Don't make sarcastic comments.
- Avoid metaphors or similes; just say what you mean directly.
- Don't comment on details that are not relevant to the individual's participation in WIOA activities.

Case Note Examples:

Poor example:

08/19/12 Steven is a youth not currently enrolled in school. He was kicked out of the alternative

school. His mom thinks he could have dyslexia. Steven is very immature so I hope he lasts in the program. Keeping his attention for the intake process was challenging.

- *Opinion, "Steven is immature," as though it were fact.*
- *No specific plan created for dyslexia issue.*
- *No timeframes or statements of responsibility.*

Good example:

08/19/12 Steven is a youth not currently enrolled in school, and he says he was kicked out of the alternative school for poor attendance. His mother sat in on the initial appointment and commented that Steven was dyslexic and had a learning plan when he was in school. At times Steven appeared distracted and uninterested. Steven stared out the window and I had to repeat questions several times. Steven hesitated before answering simple questions and often deferred to his mother.

Next Steps:

1. Case Manager (CM) will contact school district to get information on possible learning disability by Thursday.
2. Steven will bring in remaining documentation for eligibility.
3. Steven and CM will meet Thursday at 1:00.
4. Above steps will be reviewed at next appointment

Poor example:

09/30/12 Called Steven today to ask why he did not attend the pre-employment skills workshop. Steven is very immature and said he just forgot. He will not be able to start his work experience until he receives this service. I don't believe he is actually committed to the program.

- *Labeled opinion, "Steven is immature," as though it were fact.*
- *No specific plan created for providing the pre-employment service to Steven.*
- *No timeframes or statements of responsibility.*
- *Negative opinion of Steven is presented by Case Manager.*

Good example:

9/30/12 I called Steven today to ask why he did not attend the pre-employment skills workshop. He said he forgot that it was today. I informed him that he will not be able to start his work experience until he completes this service. We scheduled him to come into to the WorkOne Center after school for an hour every day next week to go over the materials covered in the workshop.

Next Steps:

1. Steven will begin tracking appointments with CM in planner.
2. Steven and CM will meet Monday through Friday next week from 4:00 to 5:00.

Good Example:

I met with Sue today (August 18th) and she is interested in going back to school to earn her CNA license. She is no longer employed as a waitress. She has her HSE but feels she needs training to secure steady employment. She is interested in working in healthcare and wants to start as a CNA. I reviewed her income information (scanned in T-1) and she meets the low-income requirements. CNA positions are on the occupations in demand list, so we will move forward with our enrollment process.

Next Step: Sue is schedule for the TABE test on Friday (August 21st) to see if she meets the requirements to benefit from the training.