
CASE NOTE DOCUMENTATION POLICY & PROCEDURES

POLICY NUMBER: 003, Revision 1

REVISION EFFECTIVE DATE: September 12, 2014

SUPERSEDES: WFC Case Note Policy P2-2011, Released January 1, 2012 and WFC Case Note Policy Memorandum Released June 30, 2014

PURPOSE

The purpose of this policy is to communicate case note documentation requirements when providing case management services to WIA program participants. This policy has been revised to address the following:

- Removed the requirement that SKIES case notes must be printed and placed in the participant hard file;
- Added minimum required case note documentation for the provision of core, intensive, training, and supportive services;
- Added minimum required case note documentation when a participant file is transferred between case managers or WDAs;
- Clarified the frequency and content of case note documentation of follow-up services for WIA Youth and WIA Adult and Dislocated Worker programs; and
- Included additional guidance for documenting case notes in the Case Note Documentation Handbook.

The content of this policy was derived from WIA Regulations; recommendations provided by Department of Labor Employment and Training Administration (DOL ETA) through various Training and Employment Guidance Letters (TEGLs) and through DOL sponsored resources located on Workforce³One at www.workforce3one; results of program monitoring activities at the federal, state and local levels; from ESD sponsored case note training; and other WDC case note policies.

BACKGROUND

[WIA](#) Sec. 101 (5) defines case management as the provision of a client-centered approach in the delivery of services designed to-

- (A) Prepare and coordinate comprehensive employment plans, such as service strategies, for participant to ensure access to necessary workforce investment activities and supportive services, using, where feasible, computer-based technologies; and
- (B) Provide job and career counseling during program participation and after job placement.

Basic to this approach is the on-going maintenance of detailed case notes on WIA or other services provided to each program participant. Case notes justify the decision to utilize WIA funds and give an accurate record of case management actions taken, the reasons behind those actions, the expected results and the actual outcomes.

Case notes document compliance with WIA regulations, state and local policies and contractual obligations. Case notes create a paper trail should questions arise about how the case was handled and may be used in legal action for or against the WIA service provider and/or case manager.

Detailed case notes are important for the following reasons (this list is not intended to be an exhaustive or exclusive list):

- If the original case manager leaves his/her position and a new case manager inherits the participant file. The new case manager should be able to follow the story of why the participant was enrolled, services planned, services provided and current status of the participant.
- Management needs access to information pertaining to the services provided to the participant.
- WIA funded activities are subject to program monitoring, fiscal auditing, *data validation reviews, and other compliance oversight by: DOL ETA; Comptroller General of the United States; Washington State Employment Security Department (ESD); the Office of the State Auditor; WorkForce Central; and other contract and fiscal monitors who must have access to information pertaining to the services provided to participants in order to evaluate the effectiveness of the services provided, appropriateness of funds spent, and assure conformance to governing laws, regulations and contractual compliance.

* As noted in [TEGL 28-11, Attachment A](#), case notes are heavily relied on for data validation purposes. TEGL 28-11, Attachment A describes case notes as paper or electronic statements by the case manager that identifies, at a minimum, the following: a participant's status for a specific data element, the date on which the information was obtained, and the case manager who obtained the information.+

- Detailed examination of case notes will provide justification and documentation for any actions taken and may provide evidence for which physical documentation is not available.
- Participant files with limited, incomplete or missing case notes may contribute to disallowed costs; and
- The participant record may be requested by the participant, subpoenaed by the legal system or through public records disclosure.

POLICY

Case notes are a required method of documenting WIA funded services and represent the essential elements of WIA program service delivery. They create a historical record of service delivery and are a compliance record for risk management and cost allowances.

As such, all participant files, either hard copy or electronic, must contain detailed and current case notes documenting WIA participant eligibility, program enrollment, and the delivery of WIA services in accordance to the following minimum standards. *(For additional guidance for effective case note documentation, refer to the WFC Case Note Documentation Handbook.)*

PROCEDURES

A. Case Note Documentation:

- Case notes must include the date of entry of the note and the name or initial of the person writing the note. (SKIES will automatically populate this information.)
- Case notes must be entered into SKIES and should provide substantial detail about the participant's eligibility, services planned, services provided and service outcomes. If the SKIES case notes provide all of the detail of the participant's case management services, case managers are not required to print the SKIES case notes and place them in the participant hard file.

However, this policy does not prohibit case managers from continuing to include case notes in both the participant hard file and in SKIES, especially for case managers who choose to enter more detailed case notes in the participant hard file than in SKIES.

- For data validation purposes, case notes documenting the dates of services and activities such as program enrollment, service delivery, service outcomes, and program exit must match the dates entered into SKIES. (*For example, if a case note stated a participant was enrolled into the WIA program on August 1, 2014, then the SKIES enrollment date must be August 1, 2014. If the case note stated a participant started training on September 4, 2014, then the SKIES Service Plan must have a training start date of September 4, 2014.*)
- Case notes must include management approval for any exceptions to policies related to the delivery of services to WIA eligible participants (e.g.: management approval to raise ITA or supportive service limits for a participant).
- Case notes must be factual and not contain opinions, derogatory statements or diagnoses for which the case manager is not qualified to make.

B. Confidentiality:

- Case notes must not contain information identifying other program participants.
- Printed case notes must be secured in a participant case file. For example, case notes should not be loosely placed in a participant file, stored on a desk, or remain unattended on a copy machine. Case files must be maintained in a locked file cabinet or service location when not in use.
- Medical or disability related information must be redacted from case notes and placed in a separate locked file away from the working participant files. The case notes should include a reference to the medical file and where the medical file is located. (Example: *%See medical file in program manager's office for more information.*%) Case managers should ensure the redacted case note is not legible.

C. Frequency of Case Note Documentation:

- The frequency of case note documentation is determined by the intensity of the service delivery plan. However, the minimum expectation for case note documentation is once per calendar month while the participant is actively engaged in the program. (*See Section L of this policy for frequency of case note documentation while in follow-up.*)

- D. Program Eligibility Determination and Enrollment:** Case notes must document, at a minimum, the following eligibility and enrollment elements:
- Document how the participant meets the WIA program eligibility criteria;
 - Participant's eligibility and management approval for enrollment in the WFC WIA Adult Fifth Priority (*WIA Adult Program only*).
 - The need for additional assistance and serious barriers to employment, if applicable (*WIA Youth Program only*).
 - Eligibility criteria and WFC approval for WIA youth enrolled in the 5% category.
 - The date the participant was enrolled into the program. The date of enrollment referenced in the case note must match the enrollment date entered into SKIES.
 - If a participant is co-enrolled in two programs (e.g.: an older WIA Youth co-enrolled in the WIA Adult program), case notes must document the justification for the concurrent enrollment and document the coordination between programs for services provided.
 - Enrollment of non-Pierce County residents requires coordination with the WDC of residency and management approval, both of which should be documented in the enrollment case note. Exceptions to this policy must be documented in the enrollment case note located in SKIES.
- E. Assessment** [[WIA](#) Sec. 129(c)(1)(B) and 134(3)(C)(i)]:
- Date(s), description and results of assessment(s) used that determined the participant's employment and training plan.
- F. Individual Service Strategy/Individual Employment Plan (ISS/IEP)** [[WIA](#) Sec. 129(c)(1)(B) and 134(3)(C)(ii)]:
- Document the dates of the development and outcomes of the participant's services plan.
- F. Core Services-Adults and Dislocated Workers Only** ([CFR 663.160](#)):
- Case notes must document the date and type of the first core service the participant received prior to enrolling into the WIA Adult or Dislocated Worker program.
- G. Intensive Services:**
- Case notes must document the date and type of the first intensive service the participant received ([CFR 663.160](#) -*WIA Adult and Dislocated Worker Programs only*).
 - Case notes must document the provision of all other intensive services provided including the date of the service, expected outcome, and date of the actual outcome.
- H. Supportive Services:** Document the provision of every WIA funded supportive service, including:
- Date and amount of each supportive service provided;
 - Vendor name;
 - The effort made to obtain services through other resources prior to providing the WIA funded supportive service [[CFR 663.805\(a\)\(2\)](#)]; and

- Justification for the service. How the supportive services are necessary to enable the individual to participate in WIA activities [[CFR 663.805\(b\)](#)].
- If incentives are provided to a participant, the case notes should document why the incentive was provided, the amount of the incentive, and the date the participant received the incentive.

I. Training Services: Document training services needed and provided, as outlined on the employment plan including, but not limited to:

- How the selected training program supports the results of the participant's assessment;
- Results of other non-WIA training funding resources explored ([CFR 663.320](#)), or any exceptions to seeking non-WIA training funds;
- Training progress (e.g.: attendance, grades, challenges, successes);
- Authorization of the ITA and any approved increase or modifications (*WIA Adult and Dislocated Worker Programs only*);
- If the participant's training is not covered by an ITA (*WIA Adult and Dislocated Worker Programs only*), case notes should explain the method of funding the training (i.e.: cohorts, other non-ITA funded training);
- Case notes should document the participant's willingness and ability to travel to locations outside of Pierce County if the selected training program and/or demand occupation is outside of Pierce County;
- Date training completed (e.g.: withdrew, dropped out, graduated); and
- Date credential, certificate, or degree earned.

J. On-the-Job Training (OJT): Case notes should include, at a minimum:

- The start and end dates of the OJT;
- Name of the employer;
- Participant's job title; pay and benefits (if applicable);
- Any supportive service needs identified during the OJT;
- Skills to be learned; anticipated outcomes of the training plan;
- Information pertaining to any supplemental training, if applicable.
- Modifications to the training plan, if applicable.
- Case notes should be entered throughout the participant's OJT to document the participant's progress and/or challenges during the OJT and any services provided to the participant and/or employer during the OJT.
- All visits to the employer and status updates resulting from monitoring and participant evaluations (on-site visits, phone or emails) must be documented in case notes. The entry should identify when the visit was made, what was observed, who was interviewed, a synopsis of the content of the conversation, and any items of concern that need to be addressed.

- A case note should be entered when the OJT is completed including the status of the participant's employment with the employer.
- If the participant exits the OJT prior to the anticipated completion date, case notes should reflect the reason for the early termination from the participant's perspective, information received from the employer, and next steps in the participant's employment plan.

K. Participant File Transfers:

- When a participant file is transferred from one case manager to another case manager, the case notes should reflect the date the file was transferred and to whom.
- When a participant file is transferred from one WDA to another, case notes should provide details about why and when the file is transferred and include the name(s) and contact information of the previous service provider(s).

L. Exit and Follow-up:

1. **Exit:** Case notes must document date and reason for exit.
2. **Follow-up:** Follow-up documentation requirements for the WIA Youth and WIA Adult/Dislocated Worker Programs are described below. Definitions of follow-up services are located in SKIES at: <http://www.wa.gov/esd/skies/>.
 - **WIA Youth:** All youth participants must receive some form of follow-up services for no less than 12 months after the completion of participation, as appropriate [[WIA Sec. 129\(c\)\(2\)\(I\)](#)]. The types of services provided and the duration of services must be determined based on the needs of the individual [[CFR 664.450\(b\)](#)], identified on the Individual Service Strategy (ISS) and in case notes at exit.

If a youth is exited from the program due to not having received services for more than 90 days (e.g.: lack of contact), a follow-up plan must still be opened. When contact with the youth is lost, case managers must document methods utilized to contact the participant and results of the attempted contact. Case managers must continue to document attempts to contact the participant on a minimum monthly basis for the duration of the 12-month follow-up period.

If the case manager regains contact with the participant and learns from communication with the youth that he/she is, at that time, not in need of additional services or assistance, case managers must fully document the details of that conversation in case notes. This includes documenting the questions that lead the case manager to assess the youth is not in need of services or assistance that are available during follow-up and that can help the youth achieve goals outlined in his/her ISS ([TEGL 33-12](#)). In this circumstance, the case manager is no longer required to attempt to make direct contact with the participant. However, the case manager should continue to access TAXIS in SKIES for employment wages and document employment status in the follow-up plan (Reference: [DOL ETA Ensuring a Successful Transition: Providing Effective Follow-up Services for Youth in WIA Programs](#) webinar dated September 18, 2013).

Follow-up Documentation - Follow-up case notes should be entered in the Contact Log of the SKIES Follow-up Services Plan. Follow-up case notes should follow the same guidelines and content described above including: service needs and services provided; outcomes of conversations or in-person meetings; job placement or post-secondary status updates; and credentials earned. Case notes should be entered as soon as the information is obtained and/or services are provided; or on a monthly minimum basis.

- **WIA Adults/Dislocated Workers:**

[WIA Section 134\(d\)\(2\)\(K\)](#) requires follow-up services for WIA adults and dislocated workers for no less than 12 months following the first day of employment, as appropriate. The intensity of, or need for follow-up services will vary depending on the needs of each participant.

Follow-up Documentation – When exiting a participant from the WIA Adult or Dislocated Worker Program, the exit note should contain documentation supporting the level and intensity of follow-up services planned, including an explanation for the reason if no follow-up services are planned. The date of the exit case note must match the exit date entered into SKIES.

There is no minimum frequency required for case noting follow-up services for WIA adults and dislocated workers; the frequency of the follow-up case notes should follow the intensity of the service plan. Case notes must document any changes to the intensity of the follow-up service delivery plan.

Follow-up case notes should be entered in the Contact Log of the SKIES Follow-up Services Plan. Follow-up case notes should follow the same guidelines and content described above including: service needs and services provided; outcomes of conversations or in-person meetings; employment (including self-employment) or post-secondary status updates; and credentials earned. Case notes should be entered as soon as the information is obtained and/or services provided.

- **Exceptions to Follow-up** ([TEGL 17-05](#)) - Participants who are exited from the program for the following reasons are excluded from follow-up services. Case notes must document exceptions to Follow-up:
 - Institutionalized;
 - Health/medical or family care;
 - Deceased;
 - Reserved forces called to active duty;
 - Relocated to a mandatory program; or
 - Invalid or missing Social Security Number.

REFERENCES

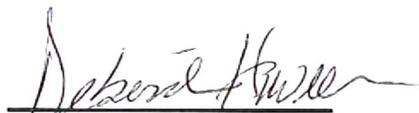
- [Workforce Investment Act of 1998](#)
- [TEGL 17-05](#) - *Common Measures Policy for ETA Performance Accountability System*
- [TEGL 28-11](#) - *Performance Reporting and Data Validation Timelines, Attachment A –Source Documentation Requirements*
- [TEGL 30-10](#) - *WIA Youth Program Guidance for PY2011*
- [TEGL 33-12](#) - *WIA Youth Program Guidance for PY2013*
- [Workforce³One](#) - *Effective Case Management, including Case Note Resources*
- ESD Employment & Career Development Division (ECDD) Training Academy - *Documentation in the WorkSource Environment*

INQUIRIES

Direct Inquires To:

WorkForce Central
3650 South Cedar Street
Tacoma, WA 98409-5714
(253) 472-8094 or 1-800-999-8168

APPROVED

A handwritten signature in black ink, appearing to read "Deborah Howell", written over a horizontal line.

Deborah Howell, WFC CAO