CASE NOTES

Policy Number: 207, Revision 5
Effective Date: July 1, 2019
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I. BACKGROUND:

The Workforce Innovation and Opportunity Act (WIOA) Training and Employment Guidance Letter (TEGL) 23-19 states that paper or electronic case notes by the case manager identifies at a minimum the following:

- Participant’s status for a specific data element,
- The date on which the information was obtained, and
- The case manager who obtained the information.

WorkSource System Policy 1020 states that case notes should support and not contradict service entries in the state provided database. All qualifying services, as detailed in Administrative Bulletin 206 MIS Policy, from the SCW Service Catalog should be entered and have a corresponding case note.

Any case notes containing confidential information, such as medical or legal information, must be kept in a separate file and in a secure location apart from the participants regular program file. This includes if a participant is out due to medical reasons (hospital visit, home sick, etc.). A corresponding case note is required and must state “the participant could not make class/job site due to excused reason.” Criminal history and/or legal information must also be placed into its own separate file, different from the medical file, and secured.

II. <u>POLICY:</u>

WIOA provides an opportunity for a greater emphasis on customer-focused case management. Integral to this approach is the utilization of multiple techniques to address and provide solutions for a variety of barriers and assessed needs of participants.

The term "case management" means the provision of a client-centered approach in the delivery of services, designed –

- to prepare and coordinate comprehensive employment and training plans, such as service strategies, for participants to ensure access to necessary WIOA activities and supportive services, using, where feasible, computer-based technologies; and
- to provide job and career counseling, including employment pathway planning during program participation and after job placement.

Case notes are a tool to help Contractors organize and analyze the information gathered on participants and to plan case management strategies. To properly document services provided by case managers, recording case notes is critical as it weaves each service element into a comprehensive service plan. **Monthly individualized case notes provide a complete, accurate, and concise explanation of frequency and type of contact with participants, including types of services provided and the outcomes associated with those services.**

Real-Time Data Entry (WIN 0082, Revision 1):

In the interest of data integrity, it is imperative, to the fullest extent possible, that data entered into ETO accurately reflect the service provided <u>at the time</u> the service is provided. Therefore, the minimal ETO data entry requirements are as follows:

- Service must be entered at the point in time they are delivered.
- If services cannot be entered at the time they are delivered, Basic Services and Individualized Training and Supportive Services (ITSS) must be entered within 14 calendar days of service delivery and the service date entered must always reflect the date the service was delivered/authorized. See Administrative Bulletin 206 MIS Policy – LATE ENTRIES.

Note: Other than the two touchpoints noted above, these data entry limitations do not impact any other touchpoints, including the follow-up services, tests and results, or placement information touchpoints. This requirement will only limit staff to entering Activity Start Dates for the Basic Services and ITSS touchpoints for services within 14-calendar days of providing the service. In addition, this requirement will not prevent staff from appropriately updated/editing the Activity End Date, Notes, Actual Outcome, Contract, and other data fields in the two service touchpoints.

LATE ENTRIES:

For any Activity Start date of Basic and ITSS services entered after the 14-day calendar timeline, staff must correct the errors and request Department Head review and approval of the correction. Department Head approval must be documented in a case note. The case note must identify the service name, reason for the correction, and the Department Head's review and approval of the correction.

ACTION:

All Contractors must have a written policy in place as to the required procedures in recording late entries and obtaining supervisor approval.

Note: Each local area has, at a minimum, one designated point of contact (Department Head) to handle the appropriate exceptions to data entry after the 14-day calendar restriction. They are responsible for ensuring the appropriate documentation and data integrity of the service dates in their local areas.

DEFINITIONS:

Department Head – An ETO user role with a higher level of system access than those assigned "Staff" role. They have the ability to make data corrections related to the Performance Integrity Reporting Layout (PIRL) and deleting services and program enrollments that were entered in error. This role is generally assigned to WDA MIS personnel, Supervisors and Administrators.

III. ACTION REQUIRED:

A detailed case note shall be created for each service provided to the participant. Services entered into the state provided database must have a dated corresponding case note in the file. Case notes should support the services and outcomes provided to the participant.

Monthly case notes shall include detailed information about the participant's eligibility, service needs, services provided, progress and outcomes of those services and general case management provided. Case notes should detail the whole story, not just one activity (e.g., GED, WEX).

Case notes that refer to voice or e-mail messages left for or sent to participants only represent a status update as opposed to the actual provision of services. Social media contact, such as Facebook, Instagram, etc., is a communication tool to "keep up" or locate participants and does not meet the definition of a service.

Questions to consider when writing case notes:

- Do the case notes document that there is ongoing contact between case managers and the participant, and that the participant's progress is being tracked?
- Do the case notes identify the barriers that may prevent the client from participating in and successfully completing the Individual Participant Plan (IPP)?
- For every service entered into the state provided database, is there a corresponding and detailed case note in the participant's file?

See Administrative Bulletin 205 MIS Policy – Attachment 5B SCW Service vs Status Case Note Examples

REFERENCES:

All Contractors will be monitored for compliance with the MIS procedures for timeliness, accuracy, and completeness of all forms and documents.

- TEGL 23-19, Change 2 – Guidance for Validating Required Performance Data Submitted by Grant Recipients of US Dept. of Labor Workforce Programs
- WIN 0082, Revision 1 – Real-Time Data Entry in the Efforts To Outcomes (ETO) System
- WorkSource System Policy 1020, Revision 1 – Data Integrity and Performance Policy and Handbook
- WorkSource System Policy 1031 – Management of Medical and Disability Related Information