



Workforce Southwest Washington Policies and Procedures

CASE NOTING

POLICY #: 3038

Date of Original Policy: 12/10/2024

PURPOSE

To communicate guidance for case noting documentation to subrecipients in the Southwest Washington Workforce Development Area utilizing a case management approach to service delivery. Maintaining comprehensive case notes for each program participant is essential.

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.

POLICY

Recording case notes is vital 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 grant 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 must record case notes so the reader can follow the story of why the participant was enrolled, services planned, services provided, the participant's status, and internal processes. Information must be relevant to the goals of each participant and must be factual, relevant, and objective. Case notes must not contain opinions, judgmental statements, or diagnoses.

Subrecipient staff must 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 must be documented in case notes, identify the type of contact with the participant, and record as soon as the service is provided. The method of communication may include a combination of desk-side appointments, phone calls, texts, letters, emails, and virtual forums. 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 or Instagram, is a communication tool to "keep up" or locate participants and does not meet the definition of a service.

A. Frequency of Case Note Documentation

The intensity of the service delivery plan determines the frequency of case note documentation. Case note documentation must occur at a minimum of once every thirty (30) days. If there has been a lack of regular participant contact, the reason must be documented in case notes.

B. Real-Time Data Entry

Case notes create both a historical record of service delivery and a compliance record for risk management and cost allowances. In the interest of data integrity, it is imperative that the data entered into the MIS (eJAS, I-Trac, ETO, or its successor) accurately reflects the service provided at the time the service is provided or support is received. Minimally, the service must be entered at the point in time it was delivered. If the service cannot be entered at the time it was 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, the date the support is received, or the start date for durational services.

Note: Other than the two touchpoints noted above, these data entry limitations do not have an impact on any other touchpoints, including the follow-up services, tests and results, or outcome information touchpoints. This requirement will not prevent staff from appropriately updating/editing the Activity End Date, Notes, Actual Outcome, and other data fields in the two service touchpoints.

C. Late Data Entry

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. The Department Head is responsible for handling the appropriate exceptions to data entry after the 14-day calendar restriction. They are responsible for ensuring the appropriate documentation, data integrity, and data element validation of the service dates in their service area.

D. Additional Considerations

Case notes must not be entered to represent service delivery without also entering a participation-level service from the WorkSource Services Catalog. In other words, case notes do not represent documentation of services and are not substitutes for proper entry of services in the state MIS.

- i. Information contained in case notes belong to participants.
- ii. Case notes are legal documents that may be subpoenaed by the courts or disclosed through public records requests.
- iii. Case notes are also used to represent the One-Stop services and activities and their compliance with federal, state, and local policies.
- iv. Case files and case notes are subject to monitoring and data validation reviews.

- v. Case notes need to support, not contradict, service entries.

PROCEDURES

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

- A. Program eligibility determination and enrollment case note must document the following:
 - i. How the participant meets program eligibility criteria and how the participant will benefit from services.
 - ii. 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.
 - iii. How the participant's desired occupational goal is in demand as confirmed by labor market information.
 - iv. The participant's needs are clearly explained by information gathered from intake, interviews, and the objective assessment.
 - v. All the participant's barriers and if they will affect the participant's desired goals.
 - vi. The reason self-attestation was used to document eligibility and why other forms of acceptable documentation are not available.
- B. Co-enrollment case notes must document the following:
 - i. Justification for the concurrent enrollment.
 - ii. Coordination between programs to identify the services to be provided by each program
- C. The Individual Employment Plan (IEP), Individual Service Strategy (ISS) and/or Career Plan case notes must document the following:
 - i. Progress in meeting objectives, changes in training, education, supportive service/incentive needs, referrals to community resources, employment goals, accomplishments, and setbacks.
 - ii. ISS for youth must document the 14 elements.
 - iii. All modifications to the IEP/ISS/Career Plan and explain why the modification occurred.
 - iv. If late modification/revision occurs, the case notes must indicate why late or delayed entry.
 - v. Links to one or more performance indicators.
 - vi. Goals met including credentials earned or employment attained.
- D. Supportive service case notes must document the following:
 - i. The participant's request for supportive services before the participant incurs the expenditure.
 - ii. Justification for the requested service, stating the reason services are necessary to participate in program activities.
 - iii. Efforts to use other community resources before WIOA and discretionary supportive service dollars are authorized.

- iv. The requested supportive service amount and name of vendor purchased from.
 - v. The date the participant receives the support.
 - vi. If receipt of the support is delayed for any reason, a note must be made to give the reasoning.
- E. Incentive case notes must document the following:
- i. The participant is actively engaged in programming.
 - ii. The participant is eligible to receive incentives and what funding source is expended.
 - iii. A dollar amount issued and a total incentive amount to date, keeping in mind the maximums per funding source.
 - iv. The date the participant receives the incentive.
 - v. If receipt of incentive is delayed for any reason, a note must be made to give the reasoning.
 - vi. Any additional requirements outlined in program specific policies.
- F. Assessment case notes must document the following:
- i. The type of assessment used to assist in determining the participant's educational, employment, and training goals.
 - ii. The summary of the assessment results that was discussed with the participant.
- G. Job search assistance case notes must document the following:
- i. Resume assistance provided.
 - ii. Job referrals relevant to the participant's goals of employment.
 - iii. The participant's job search efforts.
 - iv. Interview outcomes.
- H. Occupational Skills Training case notes must document the following:
- i. 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.
 - ii. If the comprehensive assessment results indicate the participant has the skills and qualifications to participate in training successfully.
 - iii. How the participant's desired occupational goal is linked to in-demand employment opportunities as confirmed by Labor Market Information (LMI).
 - iv. The Eligible Training Provider List (ETPL) was made available to the participant.
 - v. Details and documentation if classified as an ITA.
 - vi. The funding source 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, demonstrating WIOA and discretionary funds supplement other sources of training grants.

- vii. Justification for the requested training and the reason the service is needed.
 - viii. The date training is scheduled to start and end.
 - ix. Evidence of the participant's satisfactory progress in training (e.g., transcripts, report cards, progress reports showing skills gained, and certificates).
 - x. Source Documentation obtained as evidence to validate training outcome and date of outcome.
 - xi. The date the participant withdrew from training, if applicable. An explanation if the training provider will reimburse WIOA and discretionary training funds expended.
 - xii. The date and type of measurable skill gain achieved.
 - xiii. The date and type of credential earned.
- I. On-the-Job Training (OJT)/ Work Experience (WEX) case notes must document the following:
- i. Outreach efforts utilized to develop OJT/WEX opportunities with potential employers.
 - ii. Justification for the requested OJT/WEX and the reason the service is needed.
 - iii. The start and end date for OJT/WEX, name of the employer, and participant's job title.
 - iv. 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.
 - v. 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.
 - vi. The date and type of measurable skill gain achieved for an OJT.
 - vii. The required Academic and Occupational Education component for youth WEXs and the contextual learning accompanying the work experience.
- J. Workforce Preparation Service case notes must document the following:
- i. Justification for the requested service, stating the reason services are necessary.
 - ii. Subrecipient's efforts to utilize other community resources before WIOA and discretionary funds are authorized.
 - iii. The name of the service provider.
 - iv. Start, end dates, and outcomes.
- K. Hold-Gap in service (Individualized/Training) case notes must document:
- i. The service is being used to accommodate the start date for training or other educational services and document the planned start date for upcoming training.

- ii. 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.
- L. Exit case notes must document the following:
- i. The reason for exit.
 - ii. The services provided and outcomes attained while in the program.
 - iii. Employment or post-secondary information, if applicable.
 - iv. The reason follow-up services are not planned, to include but 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
- M. Follow-up case notes can document the following:
- i. Assistance with job retention.
 - ii. Assistance in securing better-paying jobs.
 - iii. Additional career planning and counseling.
 - iv. Assistance with work-related problems.
 - v. Information about additional educational or employment opportunities.
 - vi. Referral to other community services.
 - vii. Post-program supportive services.
 - viii. Post-exit credentials and quarterly employment updates.
- N. Additional Communication
- i. Referral case notes must be entered documenting the date the referral is made, name of the provider making and receiving referral, the associated program(s), and reason for the referral.
 - ii. A case note must be recorded when a pre or post-test is given. The case note must detail the type of test (pre or post) and if gains were earned.
 - iii. An issue mentioned in one case note must 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 must make every effort to schedule a deskside appointment with the participant to discuss the situation and identify a plan of action and resolution.
- O. Confidentiality – (see [ESD State Policy Management of Medical and Disability Related Information 1031](#) for additional guidance)
- i. If confidential information is obtained from a participant, based on case-by-case and extenuating circumstances, case notes must read

- “participant notified case manager of barrier to employment, for verification purposes the information was added to a confidential file.”
- ii. All documentation and notes regarding a customer’s medical information and/or disability and record of accommodation must be stored in a separate, secure storage system. If files are maintained on paper, they must be kept in a locked cabinet with limited access and separate from other file types maintained for the customer. Please note that medical and disability-related information should not be stored in staff desks. If medical files are maintained electronically, they should be secured in a password protected file or access to the electronic file location must be limited, and they should be stored separately from other file types. Confidential files must only be accessible by Administrator, Program Supervisor, Monitoring team, Quality Assurance team (if applicable), and/or Local EO Officer.
 - iii. Medical or disability information **must not** be entered into case notes.

DEFINITIONS

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

REFERENCES/RESOURCES

- Washington State Management of [Medical and Disability Related Information Policy 1031](#)
- Washington State [Data Integrity and Performance Policy and Handbook 1020 Rev 2](#)
- [TEGL 23-19 Change 2](#) - Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs
- [TEGL 10-16 Change 3](#) - Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs
- [WSW Supportive Services Policy 3005 & 3503](#)
- [WSW Training Policy 3033 and Handbook](#)
- [WSW Career Accelerator Incentive Policy 3502](#)

SUPERSEDES

- Technical Assistance Memo 21 – Case Noting

WEBSITE

<http://workforcesw.org/providers#OperationsPolicies>

INQUIRIES

Please contact Tamara Toles ttoles@workforcesw.org (360) 567-1075 for questions.