

Technical Assistance Guidance

TAG 45-2020

Issued Date: September 1, 2020

Subject: Guidance on Case Noting for WIOA Title I Services

Purpose

This TAG provides guidance regarding case noting requirements for WIOA Title I services.

References

29 U.S.C. 3245; Public Law 113-128 WIOA Secs. 116, 185, 188, 189, and 503; 20 CFR Part 677, 20 CFR Part 683, TEGL 14-18, TEGL 19-16, TEGL 39-11, SCP 5.5, and WC Policy GEN-050-07

Background

The purpose of case notes is to provide a detailed narrative of WIOA Title I services provided so that another employee, supervisor, partner program, or monitor is able to understand what services have been provided and the justification for these services. The case note narrative must include barriers to training and/or employment, planned activities, action, and follow through.

Active enrollment in WIOA, Titles I and III is contingent upon participants being involved in the continuous provision of service activities. While documenting services in case notes is important, it **does not** keep participants enrolled and prevent a participant from soft exiting. Case notes are vital for detailing what is being provided to the participant and justifying the WIOA Title I enrollment. They are also necessary for source documentation purposes in data validation. Several data validation elements, such as last date of service, last date of training, and employment at participation may be verified with case notes.

Guidance

Case notes must be entered to document every point of contact with a participant and must be updated at a minimum of every thirty (30) days in the MIS, currently EmployNV. All conversations and events should be recorded in a case note as soon as possible after the occurrence. The subject of the note should be easily identifiable and distinguishable. Case notes should always be factual and not reflect personal opinions. If an opinion is necessary, it must be relevant to the individual's WIOA participation and progress and must be labeled as an opinion.

The specific details included in each case note will vary depending on the type of activity that is being recorded and the individual participant's situation. In general, case notes resulting from interactions with the participant should include the following elements:

- Description of the context of the interaction (e.g., The participant dropped by the office to respond to the career coach's request for a meeting.)
- Purpose of the interaction (e.g., The career coach wanted to discuss the participant's progress in the occupational skills training program.)
- Content of the conversation (e.g., The participant stated they were struggling to attend their work experience because of childcare barriers.)
- Outcome of the interaction including the purpose of the meeting was achieved and were other objectives noted in the IEP/ISS achieved. (e.g., The career coach and participant discussed that the participant's current babysitter has been unable to provide care lately due

to personal issues. The participant stated that he/she is working with a family member to provide childcare, but he/she will not know if this will be an option until sometime next week.)

- Plans for next steps or when the next meeting is scheduled (e.g., The career coach and participant agreed to meet within one week to determine if additional childcare assistance will be required.)

At a minimum, case notes that document services should answer the following questions in order to meet data validation requirements:

- What services were provided?
- What date was the service provided?
- Why did the career coach provide the service(s)?

Case notes must be clear and easily understood by the reader. Someone with no contact with the participant should be able to read case note entries and get an accurate picture of what services are being provided, the date the services are provided, and the justification for these services. Case notes should clearly reflect the participant's progress throughout the enrollment/participation in the WIOA Title I program. There should not be gaps in case note entries with more than thirty (30) days without contact between the participant and the career coach or another WIOA Title I staff.

Below are a few rules to follow to ensure that case notes are objective observations:

- Record facts accurately and completely – behaviors you observed or statements you heard.
- Do not make judgements based on what you observed or heard. Never include opinions, stereotypical comments, or any offensive statements.
- If you must state an opinion that is relevant to WIOA Title I services, please be sure to label your statement as an opinion (e.g., It is the opinion of this career coach...)
- Use clear, simple, concise language, including professional terminology. Proper English grammar and spelling must be used.
- Do not use slang, clichés, or jargon.
- Do not comment on details that are not relevant to the individual's participation in WIOA Title I services. Please keep documentation focused on how events in the participant's life will affect goals and objectives identified in their IEP/ISS.
- Do not use discriminating statements, especially on the grounds of race, age, sex; with the exception of age as it relates to youth participants.
- Avoid use of abbreviations or acronyms.

When documenting problems, also include solutions. For example, if you say, "*Participant is not making progress towards completing the occupational skills training activity,*" then suggest what you are doing to remedy the situation. For example, "*Participant is not making adequate progress in occupational skills training. He will receive individual tutoring in math to help him understand mathematical components required for successful completion of the training.*"

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 WIOA Title I program and its compliance with federal, state, and local policies. Please view all case notes as a potential legal document. Case notes can be used as evidence during an investigation conducted by local, State and Federal entities. Ask yourself as you are writing, "*Would I want what I am writing to appear in an investigation?*"

The following items DO NOT constitute a WIOA Title I service nor contact with a participant:

- Leaving messages for the participant
- Speaking with a participant's relatives
- Sending flyers, letters, or emails to the participant
- Speaking with a participant's probation/parole officer
- Having a casual (unrelated to the program) conversation with the participant in public (e.g. in a retail store)
- Having the participant simply bring in time and/or attendance records for payment when no "meaningful" service/discussion/guidance was provided
- Sending "contact me" or "contact our offices" messages via email, U.S. Postal Service, or telephone
- Regular contact with the participant or employer to ONLY obtain information regarding his or her employment status, educational progress/status, need for additional services, or income support payments; there must be "meaningful" service provided
- Commentary/opinions on participant's personal circumstances that are unrelated to employment and training activities and pursuits.

The above items can be included in the case notes section in the MIS, currently EmployNV; however, these will not be considered case note entries or a status update on the participant's current status in the WIOA Title I program.

Case notes must be entered to document every point of contact with a participant.

All conversations and events should be recorded in a case note as soon as possible after their occurrence. The subject of the note should be easily identifiable and distinguishable. Case notes should always be factual and not reflect personal opinions. If an opinion is necessary, it must be relevant to the individual's WIOA participation and progress and must be labeled as an opinion.

Confidential medical information must never be documented in case note entries in the MIS (currently EmployNV).

TYPES OF CASE NOTES

The following is not an exhaustive list of all possible types of case notes. Participant details may vary depending on the individual participant characteristics and the specific details of the case.

Initial Case Note

This case note is critical as it documents registration into the MIS (currently EmployNV) and will be reviewed during monitoring and data validation activities. This initial case note must contain the following:

- Why the participant is being enrolled in WIOA Title I services and what future services/activities will be provided.
- **For ADW participants**, the participating/enrolling service (e.g., Initial Assessment) and what other services were provided on the same day of the participation date (e.g., eligibility determination, overview of WIOA Title I program, IEP/ISS).

- **For Youth participants**, the Objective Assessment, and Individual Service Strategy and the first youth element provided. The date of the first element provided will be the participation date in WIOA Title I Services.

Individual Employment Plan (IEP/Individual Service Strategy (ISS)

A case note is required for all participants who are determined to need individualized career services. This will include all activities/services in which updates or additions to the IEP/ISS are planned. Each time a participant takes part in IEP/ISS activities/services the following information must be documented in case note entries in the MIS (currently EmployNV):

- Describe the specific IEP/ISS activities.
- Describe the services/activities that have been planned for the participant and how these services/activities will help the participant achieve their documented goals/objectives.
- Describe what goals and/or objectives have been achieved.
- Describe any changes to goals and/or objectives.

Job Search Assistance

A case note entry is required whenever an employer contact is made on behalf of a participant. Such contacts should be for the purpose of assisting a participant in finding work with this particular employer. Each time this service is provided, identify the specific employer(s).

Workshops or Group Activities

WIOA Title I services may be delivered in group or workshop settings. When a participant attends a workshop or group activity, information regarding the activity must be included in the case note.

- Include the title, date, and location of the workshop, for example: *“Participant attended the Resume Writing workshop on July 1, 2020.*
- Briefly describe the purpose of the workshop and what the next steps are in the WIOA Title I Program.

Work Experience

A case note is required to document when a participant receives a paid or unpaid structured learning activity at a worksite along with the justification for this service. The following information must also be documented in case note entries:

- Describe the specific Work Experience activity the participant will receive (worksite, wage, maximum number of hours allowed, and a brief summary of the duties to be performed).
- Describe the specific skills the participant will acquire as a result of participating in the Work Experience activity.
- Describe how the Work Experience will help the participant achieve his or her employment goal.

Occupational Skills Training

A case note is required to document when a participant receives an assistance with an occupational skills training activity from the Eligible Training Provider List (ETPL) along with the justification for this service. The following information must also be documented in case note entries:

- Summarize why this training will be beneficial to the participant.
- Describe the specific training program and training institution where the participant will receive training.

- Detail the status of any Pell grants and/or other sources of financial aid that is available to the participant. If the participant has selected training that is not Pell grant eligible, this should be case noted.
- Describe the skills that the participant will acquire as a result of the training and how these skills will assist the participant is attaining their employment goal
- The start date and the estimated completion date of the training.
- Once completed, the actual end date of the training, if the training completion was successful or unsuccessful, and if the training resulted in credential and/or measurable skill gains attainment.

On-the-Job Training (OJT)

Each time an employer hires a participant and WIOA Title I funds are used to pay a percentage of the participant's wages during the training period, a case note is required and should document the following information:

- Describe the specific training the participant will receive (OJT employer, wage, job title, maximum number of hours allowed, and brief summary of the duties to be performed).
- Describe the specific skills the participant will acquire as a result of participating in the OJT.
- The start date and the estimated completion date of the OJT.
- Once completed, the actual end date of the training, if the training completion was successful or unsuccessful, and if the training resulted in measurable skill gains attainment.

Supportive Services

Each time a participant is provided a service designed to reduce barriers to participating in training or work activities, it must be documented in a case note that includes the following information:

- Describe the participant's need for the supportive service, including the specific barrier that the supportive service will address.
- Describe the efforts made to leverage the needed supportive service from other community organizations.
- Describe the specific supportive service that is provided, the date the supportive service is provided, the obligated amount of the service, and the actual amount of the service.

Note: Supportive services for ADW participants are not allowable during the follow-up period.

Incentive Payments – Youth Only

All incentive payments including what particular goal or milestone was obtained, must be documented in case notes in the MIS, currently EmployNV, and must include the following information:

- The date the incentive was provided to participant.
- The specific incentive provided.
- The date the milestone was achieved.
- The type of incentive that was provided to the participant. (e.g., The participant was provided with a \$50 Amazon gift card for obtaining their high school diploma.)

Partner Services/Referrals

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

- Describe the partner agency and the specific service that is being provided.
- Describe how these services will assist the participant in attaining his or her education or employment goal(s).

Closure of Services

When an enrolled participant reports completion of an open service/activity, the service/activity should be closed by the career coach in the MIS system (currently EmployNV) by recording the last date of service/activity and the appropriate completion code, the following information must also be recorded in a case note:

- Note that the participant is no longer receiving this service/activity and the actual completion date.
- Describe the results from the participant receiving this service/activity.

The expectation is that services will never be system-closed by the MIS (currently EmployNV). Any corrections to service/activity dates must be submitted to support@snvwc.org in accordance with guidelines provided by WC in TAG 43-2020, Timely and Accurate Data Entry for WIOA Title I Services.

Case Closure

When a case is being prepared for exit, a case note needs to be added that includes the following information:

- Date of the last service that was provided to the participant from the WIOA Title I program along with pertinent details of the contact that occurred during the last service.
- Employment status at the time of the case closure. If the participant is employed, please include employer name, job title, salary information, and start date of employment.
- **Youth Only** - Education status at the time of the case closure. If the participant is enrolled in post-secondary education please include school name, course of study, credit hours scheduled and start date of classes.
- State if the participant was made aware of follow-up services that are offered by the WIOA Title I program.

The MIS (currently EmployNV) is designed with a Common Exit feature to facilitate reporting of WIOA Performance Indicators to USDOL. This means that a participant in any WIOA program (Title I and Title III – Wagner-Peyser) cannot exit (and be counted in performance) until they are no longer being served by either WIOA Title I or III programs. A participant's exit date carries across all programs and is based upon the last date of service from ANY of the common programs, regardless of the last date of service from a particular program.

Exclusions

There may be instances when a participant is no longer able to participate in WIOA Title I services and can be excluded from all performance indicators. All services/activities should be closed by the career coach in the MIS system (currently EmployNV) by recording the last date of service/activity and the appropriate exclusion documented in case notes. Acceptable exclusions are as follows:

- Institutionalized – The participant has become incarcerated in a correctional institution or has become a resident of an institution or facility that provides 24-hour support such as a

- hospital or treatment center. Their stay is expected to last longer than 90 days.
- Medical – The participant has medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the WIOA Title I program.
 - Deceased – The participant is deceased.
 - Reservist Recalled to Active Duty – The participant is a member of the National Guard or another reserve military unit of the armed forces and is called to active duty for at least 90 days.
 - Foster Care (Youth Only) – The participant is in the foster care system and has moved from the Local Workforce Development Area.

Complete, detailed case notes are a vital component of service delivery for WIOA Title I participants because they tell the entire story of each participant’s journey through the program, are a vital component of data validation, and allow partner programs and services to most effectively leverage resources and avoid duplication of services.