

## 5220POL Case Note Policy (Rev1)

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Last Modified: October 2022

Issued by the Olympic Workforce Development Council (OWDC), this policy provides case note documentation guidance for case management services provided to Workforce Innovation and Opportunity Act (WIOA) Title I-B participants. .

- 1. Case notes entered by staff are a requirement to document services and includes the essential elements of service delivery:**
  - assessment of the need for services
  - a plan outlining the services to be provided
  - The intent and outcomes of service delivery.
- 2. WIOA Title I-B records, including case notes, will be made available in the case of audits, monitoring, and/or examination Workforce Development Council (WDC), the United States Department of Labor (DOL), and the Washington State Employment Security Department (ESD).**
- 3. Case notes create both a historical record of service delivery and a compliance record for risk management and cost allowances.**
  - a. Case notes describe the actions, activities, plans and results of services provided to customers.
  - b. Accuracy and completeness in case notes is critical as they are used as planning tools between the WIOA Specialist and participant.
  - c. All case notes must be objective, relevant, and based on fact. Opinions, internal processes, and miscellaneous comments should be avoided.
  - d. Case notes are required to be entered at the time of service. If this is not possible, then within 14 days of service. If the case note is not entered at the time of service, a detailed reason for late entry is required (per *5220PRO Authorization of Service Entry After 14-Day Timeframe*).
  - e. Case notes must be consistent with applicable documentation kept in the customer file.
- 4. Case notes are maintained electronically in the state-wide Management Information System (MIS).**
- 5. Per 1600POL Records and Documentation Retention Policy no medical or disability documentation should be retained, see policy for further guidance.**
  - a. If confidential documentation is obtained for (based on case-by-case and extenuating circumstances) case notes may read “participant notified case manager of barrier to employment, for verification purposes the information was added to a confidential file
  - b. All documentation and notes regarding a customer’s medical information and/or disability and record of accommodations must be stored in a separate, physical file, placed in a locked file cabinet, and only accessible by Administrator, Program Supervisor and/or Local EO Officer (per *Management of Medical Disability Related WorkSource Policy 1031*).
  - c. At **no** time should medical or disability information be entered into case notes.
- 6. Staff are directed to follow these guidelines for creating and maintaining case notes in MIS:**
  - a. Eligibility and Enrollment
    - i. Adult and Dislocated Worker case notes include how eligibility was determined.
    - ii. Identify assessment tools used, results and who administered the assessments.
    - iii. Any barriers to employment should be described in case notes, include any efforts to mitigate, excluding any medical or disability information. For example: “Participant

- notified case manager of barrier to employment, for documentation purposes the information was added to a confidential file.
- iv. Any denial of services must have a detailed reason for denial documented in case notes.
- b. Services provided must include:
    - i. A brief description of the customer's needs, resources explored, and actions taken. Include services provided, expected results and dates.
    - ii. Document the rationale for any change in the customer's service plan.
  - c. General Notes Content
    - i. Case notes should document the need for service provision or omission, the progress made in the service elements, results of those services, next steps based on progress of the services, and the program outcomes of service delivery.
    - ii. If issues arise and are mentioned in one case note, there should be a plan of action and/or resolution noted. Include followed-up in subsequent case notes to be clear how the issue was or will be resolved.
  - d. Training Services
    - i. Document the resources explored, including what, if any, non-WIOA resources were applied for to assist in the cost of training, expected results, and the WIOA planned contributions. Record date of customer's completion of Training services.
    - ii. Occupational Skills Training Services case notes must document how training leads to self-sufficiency.
  - e. Program Exit and Follow-up Services
    - i. Record the customer's program exit date.
    - ii. Document post-exit credentials and employment information.
    - iii. Identify any planned Follow-up Services.

**7. Case notes are a tool to help service providers organize and analyze the information gathered on participants and to plan case management strategies. It is important case notes are clear and accurate, as well as be able to recognize and discern services and expenditures provided.**

**REFERENCES**

Data Integrity and Performance Policy and Handbook, [WorkSource System Policy 1020 \(Rev2\)](#)

Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs, Training and Employment Guidance Letter, [TEGL 23-19 Change2](#)

Management of Medical and Disability Related Information, [Washington State WorkSource System Policy 1031](#)

OWDC 1600POL Records and Documentation, 5211PRO Authorization for Service Entry After 14-Day Time Frame

Supportive Services and Needs-Related Payments, [Workforce Innovation and Opportunity Act 5602 \(Rev5\)](#)

Training Services Adult and Dislocated Worker Activities under WIOA, Title 20, Chapter V-I1, Subpart B, [20 CFR §680.230](#)

WIOA Definition of Low-Income Individual, Workforce Innovation and Opportunity Act H.R. 803 (113<sup>th</sup>) [USC §3](#)