NEMO WIB Issuance #04-09

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To: All Program Operators

From: Mark Fuqua, Executive Director

Subject: **Guidance & Policy Writing Case Notes**

Purpose: To provide policy and guidance regarding the content of Case Notes in the Northeast Workforce Investment Board Region.

Background: The Workforce Investment act of 1998 is designed around Case Management services which are documented through the use of case notes. Case notes and file documentation are critical foundations that provide evidence of services and activities that are provided to participants while enrolled in Workforce Investment Act activities as well as compliance with Federal, State and Local regulations. The guidelines in this policy are not intended to replace or supersede any legal or confidential policies. This policy is intended to provide specific guidance to WIA service providers on the requirements of the content and recording of case notes. WIA service providers are ultimately responsible for ensuring their staff is trained in writing case notes to meet specific legal and confidentiality requirements.

Substance: Case notes are required to document details about the customer's needs and services throughout their participation in program services. The notes should document the story of the customer from start to finish. Case notes can provide information on an individual's strengths and needs that can provide a justification for specific services and activities. The notes can also sometimes serve as documentation of factors affecting an individual's eligibility or other important information such as data validation, customer participation, customer services and outcomes.

All participant files must contain relevant and appropriate case notes, but should not contain details about confidential information or information that is not relevant to the services being provided to the customer. Confidential information are items that relate to the clients health, domestic violence situation, substance abuse, custody hearings, specific items related to another family member. If needed, the details of confidential information can be kept on a case note in the customer's hard copy file.

Case notes must be recorded after each interaction with the customer. The note should only contain information about the participant that affects:

- the customer's ability to participate in employment or training activities
- tracks their progress
- lists their accomplishments

A. Purpose of Case Notes

Case notes record the details of an individual's participation and document their progress toward their goals of employment and/or training. They are used as a tool to help career consultants organize and analyze the information gathered on participants and to plan case management strategies.

Information such as: the type of activity, service(s) and/or placement in employment are documented by entering the activities into a customer's Toolbox record. Case notes are a way to provide additional information needed to add detail and clarity to the customer's situation. Generally, information that is a matter of public record can be included in Toolbox.

Other purposes of case notes include:

- Document contact with customers
- Provide information relevant to the customer's case
- Indicate when sensitive documentation/information is contained in a paper file
- Facilitate seamless service delivery
- Provide information regarding topics and plans that have been discussed
- Provide documentation to meet regulatory requirements
- Document information obtained from staff and career consultants not using Toolbox
- Reduce duplication of effort
- Facilitate monitoring at local, regional, state & federal levels
- Make information accessible by other agency staff and partners working with the customer
- Document information obtained from partners not using Toolbox
- Document information about the customer's progress toward their goals and plans
- Document information about the customer's needs
- Document progress toward goals and plans
- Justify staff's request for changes to the data in Toolbox to correct information on the customer's record

B. Case Management Contact

The Workforce Investment Act, (Section 101(5)), defines case management as: The provision of a client-centered approach in the delivery of services, designed -

1. to prepare and coordinate comprehensive employment and training plans, such as service strategies, for participants to ensure access to necessary workforce investment activities and support services, using where feasible, computer based technologies **and**

2. to provide job and career counseling during program participation and after job placement.

Contact with customers enrolled into the WIA program is required, at a minimum, every 30 days. Depending on the situation, some customers may require more frequent contacts.

Case notes should reflect the customer's progress toward demonstrating basic work competencies that include: acceptable work habits, attendance, punctuality, dependability, knowledge of work, employment transition planning, job development and referral, assistance toward identifying and resolving any potential problems, labor market information, and job seeking skills.

C. Content of Case Notes

When writing case notes, care should be taken to list only the facts and avoid including personal opinions. A Career Consultant's professional opinion is acceptable when assessing the customer's preparedness for skills such as job readiness.

Case notes must provide a complete, accurate and concise explanation of the type of contact with customers as well as the type of services provided. Toolbox contains the following case note topics: Assessment, Case Review, Case Staffing, Customer Contact, Customer Information Update, Employment Exchange, Employment Plan Participation, Job Development, Problem Solving, Progress Evaluation, Referral, Service Closure, Skills Review, Support Services, UI Four Week Report and Youth Follow-Up.

The two parts to recording case notes are:

1. **Data-Facts learned about the participant** - Career consultants must sort out the information to include only the facts, observations, and information received that affect participation in employment and training programs. Case notes should focus on information that is most directly related to the participant.

2. **Plan** - Strategies to address needs and to support and enhance the customer's participation in program and to guide them toward attaining their goals of self sufficiency. When documenting problems, also document solutions.

D. Types of Case Notes

Exclusionary Exits - Case notes are commonly used to document the justification for any one of the exclusionary exit reasons for hard exit (institutionalized, health/medical, deceased, reserve forces called to active duty, relocated to a mandated program).

Medical Information - Specific details of a medical situation should not be entered into Toolbox. Case notes should state the individual has a medical condition and determine if the condition affects their participation in employment or training services. If applicable, the estimated time the individual will not be able to participate should also be included. Specifics of the medical condition can be placed in a hard copy case note and retained in the customer's file if needed.

Grades – A general summary of the student's progress may be posted in Toolbox and should include information on about classes they experiencing problems with. This case note should provide enough information for staff to make a determination if a plan for intervention or assistance is needed. The specific details about the customer's grades should be noted in a hard copy case note and retained in the customers file. For example case notes can read: The student's average GPA for the semester is 2.0. Jeremy is experiencing problems with math and will need a tutor. We will help Jeremy make arrangements with student services to attend tutoring.

Legal Issues - It is important to document the customer's barriers to employment. Any conviction or involvement with the legal system can have an impact on an individual's ability to obtain employment and/or type of employment. The details of the conviction should not be included, and care should be taken to ensure information is limited to that which is public. Specifics of the legal situation can be placed in a case note and retained in the hard copy file if needed.

Exit Case Notes - When a customer has reached their goals and no further services are planned, the career consultant should discuss exit strategies with the customer to ensure the customer is knowledgeable of the services available to them once they have exited. The exit strategy plan should be noted in the case notes. The case note should reflect information about the outcome of the individual such as place of employment, wages, and any current needs.

Unable to Contact - All attempts to contact customers should be entered into Toolbox. Information should include facts such as: number called, alternate numbers used, was a message left, was the number operational or had it been disconnected, and any other information that may aide in future efforts to contact the customer.

Follow-Up - Once a customer has exited the program, follow up contacts with the customer are required at 30, 60, 90 days, 6 months, 9 months and 12 months. Information about each follow-up contact must be entered into Toolbox. At a minimum, the following information should be included in case notes: name of employer, current situation, needs or any other details measuring the outcome and needs of this individual.

Violent Individual – A case note should be entered into Toolbox on individual's records that come into the center and displays anger outburst or violent behavior. A case note should be entered into Toolbox stating the customer was violent or displayed anger outburst. The details of the situation (he said, she said) are not necessary but the case note should provide an explanation of the event. The case note should serve as an alert to staff allowing them to handle this person appropriately in the future.

E. Do's of Case Note Writing

- Do place all contacts and attempts to contact individuals in Toolbox
- Do get all of the main ideas
- Do record facts
- Record only key details
- Do record a case note in Toolbox indicating additional documentation or information is located in the file
- Do record information that is pertinent to the customer's employment and/or training goals and needs
- Do record information that supports regulatory requirements or documentation
- Do make sure information is accurate
- Do make sure information is being entered on the correct customer's record

F. Don'ts of Case Note Writing

- Don't rewrite the entire conversation, limit information to the facts of the conservation that affects the customer's ability to participate in employment and training services.
- Don't make notes about what the customer should have said or should feel.
- Don't include your personal feelings or opinions.
- Don't use abbreviations that may not be commonly understood by anyone who need to read the case note.
- Don't write in the third party, use I, we, you.
- Don't write in all CAPITAL letters.
- Don't place specific details about medical conditions or treatment in Toolbox.
- Don't place details of the individual's convictions in Toolbox.
- Don't place details about privileged or confidential information in Toolbox.

- Do not label your opinions and judgments as facts.
- Do not use profanity in case notes.

Staff must not allow anyone to access the Toolbox system using their user ID for the purpose of entering data, case notes or for any other reason. Supervisors may request Toolbox access for staff needing to access or enter data.

The purpose of using Toolbox is for all partners to enter case notes on their customers to communicate the services and activities with all career consultants working with the individual. When writing case notes, keep in mind these notes could be read by staff providing services in other programs, other regions, central office staff, or other supervisory personnel. Case notes can and have been used as evidence in court. Toolbox is an integrated case management system with multiple partners who have access to the case notes. In addition, customers have the right to request copies of their case notes at any time.

Program operators will be responsible for regularly reviewing the case notes of their staff to ensure that they contain the required and appropriate content. When Program operators identify a case note that is inappropriate, a Toolbox change request should be submitted to the WIB asking for the case note to be deleted. Staff will enter a case note with the appropriate details of the situation.

Contact: If you have any questions or comments, please contact Mark Fuqua or Linda Studer, NEMO Workforce Investment Board, at 660-327-5125.

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