POLICY: CASE MANAGEMENT AND CASE NOTES

EFFECTIVE DATE: **POLICY NUMBER: 2017-15**

PURPOSE

The Workforce Innovation and Opportunity Act (WIOA) adheres to a case management approach to service delivery. Integral to this approach is the maintenance of comprehensive services for each program participant. Case notes are one of the tools that document the participants' journey throughout the duration of the program. Case Notes help service providers organize and analyze the information gathered on participants and to plan case management strategies. The Montgomery County Workforce Development Board (WDB) and WorkSource Montgomery (WSM) are committed to ensuring client service and appropriate documentation of progress toward securing employment. The purpose of this policy is to specify the requirements for engaging with customers (case management) and properly capturing the associated job search related activities that transpire (case notes).

BACKGROUND

Under the Workforce Investment and Opportunities Act (WIOA), case managers (career specialists) interact with individuals to assess skills, competencies and vocational interests. This policy is required to ensure that representatives of WSM, adequately listen and respond appropriately to customers providing them access to resources, tools and skills to help them obtain employment, taking into account any existing barriers, and documenting activities associated with these interactions including action steps.

CANCELLATIONS

All previous policies on Case Management remain active until the new policy takes effect.

ACTION REQUIRED

Within 15 days of the receipt of this policy it is the recipient's responsibility to ensure all staff are informed of the policy and to create an internal process to ensure accountability.

QUESTIONS

Questions relating to this policy should be directed to the Director, Talent Development / WIOA at policy@worksourcemontgomery.com, or 240-641-6736.

CASE MANAGEMENT

One of the eligibility criteria for adults and dislocated workers to receive training services, is that after an interview, evaluation or assessment, and case management, the participant has been determined to be in need of training services and to have the skills and qualifications to successfully participate in the selected program or training services. The career specialist provides quality guidance and continuing case management.

Individualized Employment Plan

Case Management includes the development of an Individual Employment Plan (IEP) based on comprehensive assessments for every participant receiving career and/or training services. The IEP should identify employment goals, appropriate achievement objectives, and the appropriate combination of services for the participant to achieve employment goals.

IEP goals should be S.M.A.R.T.:

- **S**pecific – If a goal is stated specifically, it will clarify who is to do what, when, how, where, and why. Example: A general goal would be: Have a positive attitude: Specific goals might be: smile more often, ask a co-worker if they need help, praise someone's work, etc.
- **M**easurable – A goal should be written in such a way as to help you measure whether you have reached your goals or not. Criteria should be explicit. If you want to know if your goal is measurable, ask questions such as, how much? How many?

- **A**ttainable – Goals should be reachable. If you break down the goal into smaller sub-goals that you can see step-by-step procedures, you have a better chance of determining if your larger goal is achievable.
- **R**ealistic, Relevant – Realistic goals are goals you are willing and capable of achieving. Be sure to aim higher rather than lower. You must also believe that you can accomplish the goal. Refer to past experiences to help determine if your goal is realistic. Have you accomplished a similar goal in the past? The goals should be relevant as well. What will have the greatest impact for the individual that is meaningful to him or her? Relevant means focused, valued.
- **T**imely – A goal should be time-bound. There should be a target date for progress and completion. A goal without a commitment to a schedule of target dates tends to be forgotten or neglected in day-to-day obligations and distraction.

The assessments should determine the person's job readiness, specific employment and training needs, specific strengths and deficiencies, the person's financial, social and/or supportive service needs, and should justify the services to be provided. Additionally, the assessment is an on-going activity that continues throughout a participant's relationship with the service provider and can include:

- Career services received
- Other fund sources investigated
- Other fund sources being accessed or combined with the WIOA Title I-B
- A comprehensive assessment that includes current skills and educational level and previously completed education and training
- Individual's ability to complete the course of training
- Cost and duration of the training
- Wage and wage progression expectations, and
- Employment opportunities that result in long-term job retention in the local labor market or an area to which the client is willing to relocate

Comprehensive assessment test:
- Comprehensive Adult Student Assessment System (CASAS) – assists in determining the need of skills for success in the workforce, helps place clients into appropriate education and employment training programs and can monitor progress and certify attainment of employment related competencies.

Career Exploration sites include:
- www.MyNextMove.org

- www.onetonline.org

Career planners should encourage individuals to fully-utilize the information available on the Eligible Training Provider List, provide additional information beyond the assessment test and other reports, assist individuals with doing their own research on programs or providers, and help individuals identify specific options and systematically compare them. Career planners should monitor the individual's progress through the various levels of program services.

A copy of the plan is to be given to the participant at the time of development and each time the plan is updated the participant must initial and date the IEP to acknowledge the IEP was updated. Plans are to be reviewed by the career specialist after each service element is completed. All records must be maintained in accordance with federal and state procedures.

Effective case management, involves skilled case workers and supportive policies, practices and systems, characterized by the following:

- Services tailored to individual participants' needs, abilities, skills, and interests, as well as to opportunities and supports available in the community where customers are located (or to which they might relocate);
- Supportive relationships with participants, via a person-centered approach, in which case managers assist participants in making key decisions and in meeting requirements and milestones, by using such techniques as active listening and celebrating customer successes;
- High-quality, specialized knowledge and guidance relating to occupations, job openings, training and educational programs;
- Easy coordination of services with partner agencies, through knowledge of local agencies and the ability to communicate and share information about participants;
- Seamless transitions for participants between programs and services, when needed, without lengthy, involved, or duplicative processes and information requests; and
- Improved management and information systems (including electronic data systems and related forms, checklists, and procedures) that efficiently facilitate documentation, tracking, and reporting.

Per the Maryland's Department of Labor, Licensing and Regulations (DLLR), WorkSource Montgomery and the Workforce Development Board, the following guidance recommended by the United States Department of Labor (USDOL) serves as a guide:

Staff must only record services that have truly been provided to assist participants in obtaining employment or attaining other outcomes as outlined in their IEP.

STAFF MUST NEVER ADD SERVICES SOLELY FOR THE REASON OF KEEPING A WIOA PARTICIPANT ACTIVE, AND AS A RESULT, DELAY PROGRAM EXIT.

Most WIOA services can be entered for a duration that is for more than one day. Most WIOA services - not including training – have a duration of 90 days except Counseling (WYS09) for Youth (14-24) which has a maximum duration of 180 days. Another exception is VDS Service Code 300 (Occupational Skills Training) which can be extended to accommodate year-long (or longer) training programs. Just because a service can be entered into DLLR's MWE database for more than one day does not mean it was provided each day of the duration as entered into MWE. Also, these pre-defined service durations *were not* intended for staff to keep WIOA participants active to avoid WIOA soft exits. The intended purpose of WIOA services having a duration of more than one day was because it was believed that WIOA participants can receive the same service continuously during WIOA participation.

Clients enrolled under the Adult, Dislocated Worker or Youth funding stream will receive a face-to-face meeting with their career specialist and, on occasion, a Business Services Representative to review strategy regarding their employment goals once every 30 days. The goal of this process is to ensure that an appropriate placement is being sought, to ascertain if additional services are necessary to obtain employment and to ensure that clients are actively participating under WIOA regulations. All meetings or attempts will be documented in case notes.

Exemption Terminations

An "Exemption Termination" is a termination in MWE which should be utilized in WIOA when a participant can no longer continue in the program due to one of the following circumstances:

- The participant is institutionalized – this can include a prison or hospital stay that is expected to continue for more than 90 days.
- The health /medical condition of the participant or family care – this must preclude entry into unsubsidized employment or continued participation in the program. This does not include temporary conditions or situations expected to last for less than 90 days.
- The death of the participant.
- The participant is a member of the Reserve Forces and has been called to active duty – this must be for more than 90 days.
- The participant has been relocated to a mandated Residential Program – this is for youth participants only and does not include relocation to a Job Corps center.

When a participant can no longer participate due to one of the above reasons, the exemption termination should be entered in MWE along with case note and documentation.

Follow-up Services

Adult and Dislocated Workers

Participants served with WIOA funds are required to receive twelve (12) months of follow-up services following the first day of employment. When it is discovered that a participant has obtained employment, the participant must be exited from the program and documented in MWE. The exit date should always equal the last day a service was provided regardless of the employment date.

Follow-up services may include, but are not limited to, telephone, e-mail, postal mail, social media and/or face-to- face contact. Services may be offered during the follow-up period. Follow-up services are to be documented in both MWE and the participant's Case Notes.

If the participant was a non-positive exit, follow-up services are not required.

Youth

All youth participants must receive some form of follow-up services for a minimum of twelve (12) months following the date of termination. The types of services provided and the duration of the services must be determined based on the needs of the individual. The scope of these follow-up services may be less intensive for youth who have only participated in summer youth employment opportunities.

Follow-up for Youth may include:
- Leadership development and supportive service activities;
- Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
- Assistance in securing better paying jobs, career development and further education;
- Work-related peer support groups;
- Adult mentoring; and
- Tracking the progress of youth in employment after training.

To ensure compliance, the appropriate WorkSource Montgomery Counselor is required to enter the dates in both MWE and the participant's Case Notes that follow-up was completed for each participant that exited the program at the intervals indicated below:
- 1 st month after termination
- 3 rd month after termination
- 5 th month after termination
- 8 th month after termination
- 12 th month after termination

Follow-up services may include, but are not limited to, telephone, e-mail, postal mail, social media and /or face-to-face contact.

CASE NOTES

Exemplary case notes lead to effective case management. Good case management requires that direct communication be made with the customer on a regular basis. Case notes should document a chronological history of contact with the customer, tracking what has occurred in the case. Using content from case notes will facilitate better communications and a more effective outcome when working alongside other service providers to serve a particular client. It is important to record concisely and accurately the information conveyed by the customer, requests made by the customer, information given by the case manager, and the plans mutually agreed upon. This helps to prevent any misunderstandings and eases the resolution of any misunderstandings that may occur.

- To document activity between case manager and client for addressing and taking progressive steps toward fulfilling that individual's vocational needs and goals within the constraints of the Job Center.
- To serve as a record of accountability on the part of the case manager and organization.
- To provide continuity of service in the instance of a change in case manager.
- To record the details of services and advice provided to the client.
- To document the client's participation in activities (training, networking, other resources sought out) and progress.
- To capture nuances regarding factors effecting eligibility and other information of note.
- To provide justification for services recommended and potentially provided.
- To provide focal point for monitoring the progression and effectiveness of service delivery.
- To protect the case manager and organization from potential legal issues.

Minimum Case Note Requirements

- Date
- Method of contact (phone, email, face-to-face)
- Your name and anyone else relevant
- Location (agency site or other)
- Reason for meeting including a description of discussion points
- Substance of interaction: description of desired / intended outcome / any obstacles or resolutions / action plans / goals or next steps / completion dates / impact toward meeting IEP objectives.

Case notes should be entered for all services entered into MWE. They should clearly demonstrate the amount of contact a professional has with his or her clients and show the level of service being provided to a customer. The frequency of these contacts should be at least once every 30 days. The IEP should be updated when monthly contacts reveal that customers are involved in new and/or expanded program activities.

Quality Case Notes

- Timeliness - Capture any action items, observations, thoughts, and duration as soon as possible following a meeting or call with client to ensure accuracy. For example, new test scores, job interview, period of absence, workshop attendance, etc.). Entries should be sequential.

- Concise and Clear - Write for the benefit of others as if you will not be available for consultation: factual, concise, thorough, relevant, logical, useful, well organized, and well written using clear language (no slang or jargon, opinions or judgments, generalizations) and good grammar/spelling. Do not leave anything to interpretation.
- Consistency - There should not be gaps in either time or information. Case notes should reflect the participant's work and progress throughout their participation in the program. The case notes and the rest of the file should match and reflect the same information as the test scores, start date, revisions, supportive services, etc.
- Legality and Analysis-Based - Case notes can be used as evidence in court. Adhere to anti-discrimination, conflict of interest, confidentiality re information possibly conveyed that does not directly apply to the individual's IEP, reasonable and customary actions, and the like. Write with the knowledge that it is likely to be audited or reviewed by a supervisor. Notes should reflect allowable activity and explain how it relates to individual's needs based on facts and impression and connecting them to the client's strengths and challenges.

MONITORING

WSM acknowledges that the U.S. Department of Labor and the State of Maryland has the authority to monitor and assess compliance with federal, state, and local case management requirements. To ensure that policies are being followed and expectations are being met, WSM staff or a designee will conduct onsite inspections periodically to ensure case management compliance. It will be the responsibility of the program operator to make any corrections and to conduct an internal review if areas of concern are found.

DISCLAIMER

This policy is based on WSM's interpretation of the statute, along with the Workforce Investment and Opportunities Act (WIOA); Final Rule released by the U.S. Department of Labor; and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.