



Policy: Contact Policy For Case Files

Number: WIOA 01-39 (Rev. 1 July 1, 2016)

Effective: August 31, 2006

## POLICY AND PROCEDURE DIRECTIVES

### Background:

Staff case notes/counseling logs are a required method of documenting services and represent the essential elements of service delivery: assessment of the need for services, a plan outlining the services to be provided and the intended and actual outcomes of service delivery. They create both a historical record of service delivery and are a compliance record for risk management and cost allowances.

### Policy:

Case notes/counseling logs will be proportional in number and content to the intensity of service design and delivery, but entries must be within 90 days of the last recorded service. In all participant files, the case notes/counseling logs should document the need for service provision or omission, the progress made in the service elements of and the plan of activities, results of those services, next steps based on the progress of the services, and the program outcomes of service delivery.

Case notes shall also document, with each service request, the need for the allowable supportive service and the effort to obtain other resources prior to providing WIOA funding. Records should specific, reflect observations and facts, and not contain derogatory comments, opinions or judgments.

This policy is intended to reflect that customer contacts in the early stages of assessment and plan development to be inherently more intensive and frequent and therefore reflected in more frequent case notes/counseling logs. Additionally, service design necessitates more frequent contacts and management of some services;(i.e. Work Experience, Basic Skills training, Job Search Assistance etc) versus other less intensive staff contact services (classroom based training, on the job training). The former necessitates more frequent and regular contacts and the latter permits less frequent or intensive contacts and the documentation reflecting those service contacts in the case notes/counseling logs. On-the-job training has the requirement of monthly monitoring of the training site and training plan progress. Notes may be required to supplement the information contained in the monthly OJT voucher. Access to any participant record may be granted after a request is made in writing by the participant or through appropriately executed subpoena. Case notes/counseling logs will also be used for monitoring and auditing purposes.

The recording medium for case notes will be the management information system. Any other case notes in electronic or paper format are not considered part of the applicant or participant file and cannot be used to support the enrollment or services plan and outcomes. All references to medical conditions and medical services will be kept in a separate and locked file and comply with the intent and content of this policy.