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OAHU WORKFORCE DEVELOPMENT BOARD WORKFORCE INNOVATION AND OPPORTUNITY ACT POLICY #17-25

SUBJECT: CASE MANAGEMENT

PURPOSE:

The purpose of this policy is to establish guidance on the provision of case management and participant reporting requirements in programs funded by Title I of the Workforce Innovation and Opportunity Act (WIOA).

POLICY:

The Workforce Innovation and Opportunity Act (WIOA) provides an opportunity for a greater emphasis on customer-focused and effective case management. In providing guidance, support, and motivation to customers seeking training, employment, and career advancement, staff take a holistic case management approach that utilizes multiple techniques to address and provide solutions for a variety of barriers, assessing customer needs. Case management also entails coordinating, tracking, and reporting customer activities and services via the participant individual record layout (PIRL). There also is an important connection between case notes and related issues, such as planning, implementation, follow-up, and success. Federal regulations require the Oahu Workforce Development Board (OWDB) to submit accurate participant reports and validated individual participant data. The OWDB is issuing this policy to ensure that participant data are entered into HireNetHawaii within acceptable timeframes and in the correct manner.

Case Management:

Case management is the provision of a client-centered approach in the delivery of services designed to provide career exploration and guidance, continued support for educational attainment opportunities for skilled training in in-demand occupations and industries and case notes must provide detailed information on the coordination of these services.

In addition, case management includes broader functions like facilitation, communication, and coordination to ensure that each youth receives one on one contact and guidance as needed to

participate in and benefit from the activities set forth in the Individual Employment Plan/Individual Service Strategy. All case management activities must be documented in case notes.

Any medical and disability-related information about a particular individual must be kept strictly confidential and must be stored separately and securely from other personnel information.

Case Load:

Each participant's activity must be promptly documented and noted in their case file. The staff caseload cannot exceed 75 participants at any given time. To ensure the integrity of the program and provide participants with timely service.

Case Notes:

Case notes are a key part of the customer file and must be maintained electronically in HireNetHawaii. Case notes describe the plans, activities, actions, and results of services provided to customers. Accuracy and completeness in case notes are critical because they are used by staff as planning tools when interacting with customers and may be reviewed in HireNetHawaii. Case notes must be consistent with the documentation kept in the customer file. All sub-recipient and contractor staff are directed to follow these guidelines for creating and maintaining case notes:

Include the date of entry and identify the case manager or other staff person.

- Write case notes promptly while the information is fresh.
- Provide a clear history of the customer's situation, barriers, self-sufficiency goals, occupational goals, and services needed and/or received, and describe how the customer will benefit from services.
- Highlight major events, crises, barriers, or anything pertinent to the customer continuing in a program (e.g., job search or training) or continuing to receive services.
- Identify who initiated the contact and where the contact took place. Show frequency of customer contact – at least once a month, if not more often – and if there has been a lack of regular customer contact, document why.
- Maintain notes in chronological order by date and service sequence. An issue mentioned in one case note should include a plan of action or resolution and be followed up in subsequent case notes to clarify how the issue was resolved.
- A separate entry shall be made for each contact. It is not acceptable to list a month's worth of case notes in one case note entry in HireNetHawaii.
- Identify any supporting documentation requested from the customer or a third party and record follow-up efforts to obtain the documentation.

Adult and Dislocated Worker Programs – Intake Case Notes:

Listed below are examples of case notes from the intake process. Case notes must be entered upon every point of contact with a participant. Every point of contact is defined as all correspondence with the participant, including email, phone calls, letters, and mail-outs to the participant. Case notes should always be entered immediately, and the subject should also be distinguishable, such as Individual Training Account (ITA) payment, ITA check request, Support Service Request, Support Service Payment, behavior during a workshop, follow-up, and more.

During the intake process, the following should be case noted:

- If the participant is employed or unemployed, household income and family size;
- What eligibility documentation that is missing;
- When a participant statement is used, it must always be case noted with reason why;
- Eligibility for any special projects must be case noted detailing the criteria for eligibility;
- What type of training services or other services participant is interested in, if any;
- The job search skills the participant would like to work on, or skills that are lacking;
- The identified barriers and workshops the participant may be encouraged to participate in;
- If recommendations are given and/or the participant is referred to training; and
- Instructions on next steps along with a date and time for next appointment.

Adult and Dislocated Worker Programs – Supportive Services Case Notes:

A supportive service is assistance that is necessary to enable eligible participant who cannot afford to pay for such assistance and who are unable to obtain supportive services through other programs to participate in authorized Workforce Innovation Opportunity Act (WIOA) activities. Supportive services enable the participant to remain in or to gain employment, stay in training or successfully complete program participation, and are provided on an individual case-by-case basis. Case notes must include what is needed, the barrier it's resolving, the lack of assistance available from other entities, and the participants inability to pay for the support.

Adult and Dislocated Worker Programs – Training Case Notes:

Case notes related to training should document the following:

- Pre-training case notes (where the participant is at in the process of gathering their training information);
- Waitlisted information (if the participant has to be waitlisted);
- Financial Aid eligibility;
- Approval of training, including the type of program (area of study), the credential type, and the anticipated end date of training;
- All waivers requested and approved; Case Management and Participant Reporting, all changes to the participant training (program switch, attending two schools, etc);
- Dropped out of training with reason noting any credential that may have been received; Completion of training, indicating the degree or certification attained, including the date attained; and
- All check requests and payments made charged to the Individual Training Account (ITA).

Adult and Dislocated Worker Programs – Closure/Exit and Follow-up Case Notes:

While there are additional activities that must occur and updates made in HireNetHawaii, the following activities and information must be documented in case notes:

- Participant employment closure/exit information, including place of employment, number of hours working, wage, and position;
- Detail the closure/exit in case notes, documenting all action plans, activities, and training has been completed;
- Follow-up activity documented at least quarterly during the 1st through the 4th quarters after exit, including employer, wage, hours, position, address, phone, contact numbers, and any name changes;

- Any assistance the participant may need to maintain or re-gain employment.

Youth Programs Case Notes:

Case notes are a very important aspect of the job; staff are required to update participant case notes at every point of contact with a youth. Case notes must document all of the following:

- Objective assessment, determination of school status and eligibility barrier determination. Testing information, both dates and grade levels must match actual documentation in the file. Show the need for any special accommodations as well as areas of strength;
- Goal development and monitor progress toward attainment of that goal. The goal attainment date must match case note date;
- Referrals to 14 elements available during participation and who is providing the services; Are any partner agencies providing resources?
- When participating in work experience activities, information on the work experience placement site and supervisor contact information. Does worksite placement align with career goals? Is this placement part of a career pathway? Detailed work experience notes documenting progress and any issues at the worksite;
- Academic and occupational training plan engagement. Document all changes to the learning plan (program switch, attending two schools, etc.);
- Terminations or dropped from activities with reasons why;
- Completed academic or occupational skills training with a high school diploma, high school equivalency certificate, degree or certification attained. You must include the actual date in case notes. Date of attainments must match actual documentations;
- All check requests and payments made for incentives, supportive services and those items charged under the Individual Training Account (ITA);
- All waivers requested and approved.

Youth Programs – Intake Case Notes:

Listed below are examples and instructions regarding the content of case notes for the Youth Programs. Case notes must be entered upon every point of contact with a participant. Every point of contact is defined as all correspondences with the participant, such as, emails, phone calls, letters, and mail-outs to the students. Case notes should always be entered immediately and the subject should also be distinguishable such as Objective Assessment, Follow-up, Goal Attainment, etc.

During the intake process, case notes should (notes may vary depending on individual):

- If client is an in-school or out-of-school youth, and if they are employed, have previous work experience, household income, and family size;
- What eligibility documentation you have;
- What type of services are they most interested in;
- If, and how, are they at risk of dropping out;
- Barriers identified;
- Recommendations on next steps that will occur to get participant engaged along with a planned next date and time to meet.

Youth Programs – Objective Assessment Case Notes:

Each youth receives an objective assessment of academic levels, skill levels, and service needs. The assessment shall, at a minimum, include a review of occupational skills, basic skills, prior work experience, employability, interest, aptitudes, supportive service needs, and developmental needs.

Youth Programs – Program Participation Case Notes:

A youth's participation begins after they are determined to be eligible and receive a service funded by the program. This is known as the participation date and must be noted in the case. The participation date must be case noted. Any activity provided under any of the 14 required program elements initiates participation. The length of a youth's participation should be appropriate to their needs, as identified through an objective assessment and as documented in the Individual Service Strategy (ISS).

Youth Programs – Work Experience Case Notes

Work experience is designed as a planned, structured learning experience that takes place in the workplace for a limited period of time. The intent of work experience is to provide youth with opportunities for career exploration, skill development, and to enhance their work readiness skills in preparation for employment. The goal is not to benefit the employer. It is competency based skills training and documentation of progress must be recorded in case notes along with the following:

- Initial placement indicating the job-site and supervisor along with supports provided must be documented. Structured learning plan along with the proposed time length for the work experience based on the individual needs of the participant;
- Case notes need to indicate the assessment that determined that the youth was lacking in employability skills;
- Every 30 days the contractor shall review and document the progress of work experience participants;
- Is the work experience paid or unpaid;
- Indicate which category the work experience aligns with:
    - Summer employment opportunity
    - Pre-apprenticeship program
    - Internship and job shadowing
    - On-the-job-training
- Identify the academic and occupational education that coincides with the work experience.

Youth Programs – Supportive Services Case Notes:

A supportive service is assistance that is necessary to enable eligible youth who cannot afford to pay for such assistance and who are unable to obtain supportive services through other programs to participate in authorized Workforce Innovation Opportunity Act (WIOA) activities. For youth participants such activities must correspond to the 14 WIOA elements for youth programs. Supportive services enable the participant to remain in or to gain employment, stay in training or successfully complete program participation, and are provided on an individual case-by-case basis. Case notes must include what is needed, the barrier it's resolving, the lack of assistance available from other entities, and the participants inability to pay for the support.

Youth Programs – Incentives Case Notes:

Incentive payments are permitted for recognition and achievement directly tied to training activities and work experience. Incentive payments are tied to the goals of the program identified in the participant's ISS. The WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcomes. Document in case notes the amount of the payment, how the payment was made, the specific achievement made to be eligible for the payment and provide informant on how it relates to the participants' ISS.

Youth Programs – Closure/Exit and Follow-up Case Notes:

While there are additional activities that must occur and updates made in HireNetHawaii, the following activities and information must be documented in closure/exit case notes:

- Participant employment closure/exit information, including place of employment, number of hours working, wage, and position;
- Detail the closure/exit in case notes, documenting all action plans, activities, and training has been completed.

Follow-up services must be provided for a duration on 12 months. Follow-up services are activities after completion of participation to monitor and enhance a youth's success during their transition to employment and further education, and to provide assistance as needed for a successful transition. The type of services provided and the duration of each service must be determined based on the needs of the individual and documented in the case notes. When follow-up contact is made, inquiries on employer, wage, hours, position, address, phone and other contact numbers, and name changes should be updated and recorded in case notes.

Follow-up Services:

Follow-up services must be based on each participant's needs. Participants must be made aware that follow-up is part of the commitment they make in joining the program; the message will be positive in tone and show the individual the benefit of follow-up.

Follow-up contacts must be meaningful and person-centered. Contacts may not simply be a way to obtain needed data; therefore, a phone call or text to see if the participant is employed or in school is not sufficient. Effective follow-up contacts, at a minimum, should include open-ended questions to help pro-actively identify the need for follow-up services. Follow-up services must, at a minimum:

- Be integrated into the program design and be seen as having as much value as all other program components;
- Assist participants in overcoming barriers that may interfere with the achievement of their career objectives;
- Provide proactive and reactive interventions to encourage retention in education or employment;
- Provide intense and on-going job retention support for both the participant and employer
- Facilitate communication and problem resolution;
- Provide immediate intervention for both participant and employer as needs are identified;
- Link the participants to partners to support advancement to better jobs or postsecondary education and training;

- Help troubleshoot employment and personal issues; and Case Management and Participant Reporting
- Occur frequently enough to address any issues the youth is currently facing.

Follow-up services must begin immediately following the last date of service (closure date). Follow-up services do not trigger the exit date to change or delay exit for performance reporting.

Adult and Dislocated Worker Programs Follow-up:

WIOA requires that follow-up services must be made available to Adult and Dislocated Workers for a period up to 12 months following exit from the program. The goal of follow-up services is to ensure job retention, wage gains and career progress for participants who have entered unsubsidized employment.

Follow-up services may include, but are not limited to the following:

- Counseling individuals about the workplace;
- Contacting individuals or employers to verify employment;
- Contacting individuals or employers to help secure better paying jobs, additional career planning, and counseling for the individual;
- Assisting individuals and employers in resolving work-related problems;
- Connecting individuals to peer support groups;
- Providing individuals with information about additional educational or employment opportunities; and
- Providing individuals with referrals to other community resources.

Adults and Dislocated Workers in follow-up services may receive supportive services.

Adult and Dislocated Worker participants in follow-up shall be contacted at least once (1) per quarter. Follow-up may be conducted by telephone, in person, via e-mail (or other social media), or by written correspondence. Preference is for the follow-up to be through a medium that increases the probability of interaction with the participant and also increases the probability of continued contact.

Follow-up services require contact, interaction, and the provision of an acceptable follow-up service. As an example, a text to provide assistance with a job or work-related problem is follow-up. However, although sending a letter might be considered "following-up", this is not a preferred follow-up service. Follow-up should show interaction and the provision of an actual follow-up service.

Youth Programs Follow-up:

Follow-up services must be made available to all WIOA Youth for a minimum of 12 months from the date of exit. The goal of follow-up services for youth is to enable participants to continue lifelong learning and achieve a level of self-sufficiency to ensure job retention, wage gains, and postsecondary education and training progress.

Follow-up services for youth may include, but are not limited to the following program elements:

- Supportive services;
- Adult mentoring;
- Financial literacy education;

- Services that provide labor market information and employment information about in-demand industry sectors;
- Activities that help youth prepare for and transition to postsecondary education and training; and
- Other services necessary to ensure the success of the youth in employment and/or postsecondary education.

All youth must receive some form of follow-up services for a minimum duration of 12 months unless the youth declines to receive follow-up services or the youth cannot be located or contacted. The types of services provided and the intensity of services must be determined based on the needs of the youth. Follow-up services must include more than a contact or attempted contact, a service must be provided (if possible). Contacting an individual for securing documentation in order to report a performance outcome does not constitute a follow-up service.

Youth participants in follow-up shall be contacted at least once (1) per month. Follow-up may be conducted by telephone, in person, via e-mail (or other social media), or by written correspondence. Preference is for the follow-up to be through a medium that increases the probability of interaction with the participant and also increases the probability of continued contact.

Follow-up services require contact, interaction, and the provision of an acceptable follow-up service. As an example, a text to provide assistance with a job or work-related problem is follow-up. However, although sending a letter might be considered "following-up", this is not considered a follow-up service since interaction and the provision of an actual follow-up service are required.

Documentation of Follow-up:

Minimum monthly contacts and services must be documented in the case notes and HireNetHawaii. Case notes must include narrative regarding all contacts and services. Additionally, appropriate activity codes for services provided to participants in follow-up must also be added in HireNetHawaii, as appropriate.

Exceptions to Follow-up:

Follow-up services may be discontinued if the participant indicates that they no longer need or want the follow-up contact. The participant must send an email or documentation in writing indicating the participant's desire not to be contacted further. This must be documented in HireNetHawaii case notes.

Frequency of Data Entry into HireNetHawaii

All contractors and subrecipients are required to report individual participant data via HireNetHawaii, the State's system of record, unless otherwise noted. The data, including individual applications for service, cannot be submitted more than 20-days in arrears.

OWDB prefers daily data entry, to ensure that the record is maintained according to federal requirements. Failure to perform a daily upload or data key entry can result in the following:

- Loss of Common Performance Outcomes.
    - Measurable Skills Gains

- Increase in errors during the data load process
    - Client already has been entered
    - Client has already auto-exited due to failure to submit continuing activity/services
- Data Change Requests that must be submitted to assist with errors received during the data load process. Data Change Requests will be denied if reason is due to simple failure to report by grant recipient.
- Loss of HireNetHawaii data quality for all partners.

Failure to Meet Submission Requirements:

If participant data are more than 20-days in arrears, OWDB will deny cash requests until the data have been submitted. The late submission of participant data is considered noncompliance with the Agreement entered into with the Oahu Workforce Development Board.

Document Scanning and Maintenance of Paperless Files:

Through the use of HireNetHawaii Document Scanning, subrecipients and contractors are no longer required to maintain hard paper files of participant information that are scanned into the HireNetHawaii system. Additionally, documents scanned into HireNetHawaii take place of hard files for verification, monitoring, and audit purposes. Once properly scanned into the HireNetHawaii system, paper records should be destroyed (i.e. shredded) and any documents that have been saved to a computer hard drive, desktop, removable media, Cloud storage, or in other environments shall be deleted. Such records shall only be maintained in the HireNetHawaii system unless a subrecipient chooses to maintain both an electronic file and a paper file.

Subrecipients and contractors must ensure that all scanned documents are inspected visually to ensure they are complete, clear, and easily read. Visual inspections for documents that are scanned into HireNetHawaii system must be complete, clear and legible as well as properly aligned.

Original content of a scanned document must not be altered or modified once it has been finalized. While scanning the original document is preferred, scanning legible verified documents provided by partners may serve as sufficient documentation. Documents uploaded into the HireNetHawaii system must always be current and kept current through program participation. In addition, case notes must identify the intent and purpose of all documents that are uploaded into the HireNetHawaii system.

Subrecipients and contractors must upload verification documents within HireNetHawaii as soon as documentation is made available and in accordance with eligibility guidelines and timeframes. Subrecipients and contractors must ensure that participant information is accurately reported in HireNetHawaii and that documents are uploaded for all fields that require verification.

Attaching Documents to Case Notes and/or Activities:

All documents pertinent to participant activities should be scanned through case notes and/or activities to support those entries. Subrecipient and contractor specific forms that aid in assessing the needs of the participant (e.g. supportive services determination, training eligibility determination, etc.) must be attached to the case notes of specific activities. Subrecipients and contractors must also attach documents to case notes and/or activities for documentation of services that provided under the appropriate activity (e.g. job referral verification, resume

assistance, etc.).

Electronic Signatures:

Document Scanning includes the addition of electronic signatures to any necessary documents or forms. Signatures may be captured within HireNetHawaii or using an electronic software such as Doc Signer or DocuSign. Subrecipients and contractors are encouraged to use electronic signatures for participant convenience. All scanners and signature pads purchased with WIOA funds must be documented as equipment and staff must observe the proper care and use of the equipment. This equipment must also be listed on the subrecipient or contractor Inventory List.

File Naming:

When uploading documents into the HireNetHawaii system, service providers must provide detailed names for the uploaded documents, and follow the directives as indicated in the Document Manager policy.

Procedures for Uploading Medical and/or Disability-Related Information

When uploading medical and/or disability-related information into HireNetHawaii, subrecipients and contractors shall ensure that these documents are password protected prior to uploading. Subrecipients and contractors shall ensure that these passwords are available only to staff and to the OWDB, should the need arise to review these documents.

Examples of medical and/or disability-related information include:

- Medical/health history
- Disability information
- Doctor's notes
- Disability benefits

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.

Harrison Kuranishi
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