

	New Jersey Workforce Innovation Notice		WD-PY19-9
	Issued By:	Workforce Development Division of Career Services	
	Approved By:	Hugh Bailey, Assistant Commissioner Workforce Development	
	Issued Date:	January 21, 2020	

1. **SUBJECT:** Recording Case Notes
2. **PURPOSE:** To provide guidance to Local Workforce Development Boards (WDBs), One-Stop Career Centers (OSCCs) and State-funded Youth Programs related to recording "Case Notes" in the American One-Stop Operating System (AOSOS) for consistency within the State.
3. **EFFECTIVE DATE:** This NJWIN is effective immediately.
4. **BACKGROUND:** Case Notes provide a fact-based description of a participant's interaction with the workforce system. Accurate, adequate, and timely recording of Case Notes is critical to provide quality participant service and assist in compliance monitoring. Case Notes should present a narrative (a detailed story) of each participant, so that another employee, supervisor, manager, and/or monitor is able to understand the participant's history of participation from barriers, actions, activities, and follow-up. Case Notes should also be factual and not reflect personal opinions. Case Notes must be entered upon every point of contact with a participant.
5. **POLICY:** As detailed below, this policy:
 - 5.1 Directs the creation of a mandatory Initial Case Note for any participant moved to full participation status in a training program at the time of enrollment;
 - 5.2 Requires real-time data-entry; that is, Case Note creation on the date of consultation or service;
 - 5.3 Emphasizes brevity, but without omitting sufficient details for clarity, accuracy, and appropriateness of the service rendered; and
 - 5.4 Gives guidance on appropriate notations, including cautions against including personal opinions, customer confidential details that do not belong in Case Notes, or inappropriate information from- or about- uninvolved third parties.

6. GUIDELINES FOR RECORDING: While guidelines overlap between programs, there are specific differences and needs between Youth Programs and Adult Programs. This guidance distinguishes Case Notes instructions for each program:

6.1 Youth Programs: Case notes will vary from youth to youth, should be distinguishable such as Objective Assessment, Follow-Up, Goal Attainment, etc., and must always be entered immediately after every point of contact with a participant. This includes, but is not limited to emails, phone calls, letters, and mail-outs to the participant. When documenting in AOSOS, the subject must be distinguishable, such as Individual Training Account (ITA) payment, ITA check request, Support Service Request, Support Service Payment, behavior during workshop, follow-up, etc.

1) Youth Initial Case Notes: Include the following:

- Employment status;
- School status;
- Previous work experience;
- Household income;
- Family size;
- Summary of eligibility (including missing documentation);
- Plan of activities to be offered (how will activities be implemented?);
- Job skills the participant would like to enhance;
- Workshops participant is encouraged to attend;
- Identified barriers; and
- Instructions on next steps along with the date and time for the next appointment.

2) Youth Client-Centered Approach: Youth case management is designed to provide career exploration and guidance, continued support for educational attainment opportunities for skilled training in in-demand occupations and industries. As such, youth Case Notes must include detailed information on the coordination of these services; and broader functions such as 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 ISS.

3) Youth Program Case Notes: Must include 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 include monitoring of progress toward attainment of that goal. (Note: The goal attainment date must match Case Note date);

- Referrals to 14 elements¹ 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. (e.g., Does worksite placement align with career goals? Is this placement part of a career pathway?)
- Include 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 (e.g., program switch, attending two schools);
- Terminations or dropped from activities along with the reasons why;
- Completed academic or occupational skills training with a high school diploma, high school equivalency certificate, degree or certification attained; include the actual date in Case Notes. (Note: Date of attainments must match actual documentations); and
- All check requests and payments made for incentives, supportive services, and items charged under the Individual Training Account (ITA).

4) Youth Program Specific Activity Case Notes:

- a. Objective Assessment Case Notes: Each youth receives an objective assessment of academic levels, skill levels, and service needs. Objective Assessment Case Notes must at a minimum, include:
 - A review of occupational skills;
 - Basic skills;
 - Prior work experience;
 - Employability;
 - Interests;
 - Aptitudes;
 - Supportive service needs; and
 - Developmental needs.
- b. Program Participation Case Notes: A youth's participation begins after he/she is determined eligible and receives a service funded by the program. As a general rule, no more than 45 days should elapse between the date a youth is determined to be eligible and the date the youth begins receiving services. Program Participation Case Notes must include:

¹ For additional information on the 14 elements, please refer to NJWIN 5-15.

- Documentation in the Individual Service Strategy (ISS) regarding eligible WIOA activities (any of the 14 program elements); and
 - The length of a youth's participation which must be appropriate to his/her needs, as identified through an objective assessment.
- c. 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. Work Experience Case Notes must:
- Include information about the initial placement indicating the job-site and supervisor along with supports provided must be documented;
 - Include a structured learning plan along with the proposed time length for the work experience based on the individual needs of the participant;
 - Indicate the assessment that determined that the youth was lacking in employability skills;
 - Indicate if the work experience is paid or unpaid;
 - Specify the category of work experience such as:
 - Summer employment opportunity;
 - Pre-apprenticeship program;
 - Internship and job shadowing; and/or
 - On-the-job-training; and
 - Identify the academic and occupational education that coincides with the work experience.
- d. Supportive Service Case Notes: A Supportive Service is assistance 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. Supportive services enable the participant to remain in employment, to gain employment, to stay in training, or to successfully complete program participation, and are provided on an individual case-by-case basis. Supportive Service Case Notes must include:
- What is needed;
 - The barrier being resolved;
 - The lack of assistance available from other entities; and
 - The participants' inability to pay for the support.

e. Incentive Payment Case Notes:

- Incentive payments are permitted for recognition and achievement directly tied to training activities and work experience and are tied to the goals of the program identified in the participant's ISS.
- To qualify for Incentive Payment, the WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. This could include improvements marked by acquisition of credentials or other successful outcomes; however, it is important to note that participants may not receive multiple incentives for the same activity.
- Examples of activities that would be eligible for incentive payment include, but are not limited to:
 - Attainment of a high school diploma;
 - Graduation from an alternative school;
 - Completion of a GED test;
 - Completion of basic, work readiness, occupational skill attainment goals;
 - Completion of a TABE post-test (attainment of measurable skill level gain);
 - Successful employment for 90 consecutive days;
 - Attainment of a post-secondary credential (occupational certificate, diploma or degree);
 - Completion of volunteer activities; and
 - Completion of short-term work experience activities including summer employment opportunities, pre-apprenticeship programs, internships, job shadowing and/or on-the-job training activities.

Incentive Payment Case Notes must include:

- The amount of the payment;
 - How the payment was made;
 - The specific achievement made to be eligible for the payment; and
 - Information about how this relates to the participants' ISS.
- f. Youth Program Exits: Exits occur after the participant is not provided with services for 90 days. As such, the AOSOS system automatically puts in the last date of service. At this time, youth participants should be stable in employment, post-secondary education, or training.

- **Customer Contact:** Career Counselors are to contact all of their participants, collect all employment or post-secondary exit information, enter final Case Notes, and review exit files to ensure that all data element documents have been collected and are located in the participant's file.
 - **AOSOS Review:** Career Counselors then review AOSOS to ensure that all fields are coded correctly, ISSs are updated, and all activities ended. All exits (e.g., Adult WIOA, Wagner-Peyser, or Adult Education) occur concurrently in the system.
 - **Final Status Verification:** All participant final status information must be reflected in the Case Notes and be captured using the WIOA Participation Status Screen. This includes future services, planned gaps, credential attainment date, employer information, and school status information.
- g. **Youth Follow-Up Services:** 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 aid, 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.
- **12-Month Follow-Up Plan:** Career Counselors work with the participant to develop and document a meaningful follow-up plan for a duration of 12 months.
 - **Expenses:** Any expenses allowable during participation (supportive services and incentives) are also allowable during follow-up and must be documented in AOSOS Case Notes and the ISS.
 - **Post-Exits AOSOS Required Documentation:**
 - 1) Follow-up is entered as a service in the AOSOS Services Module and must be performed at least quarterly during the 1st through the 4th quarters after exit.
 - 2) "Supplemental Data" must be collected during follow-up (see NJ WIN 2-17). Information gathered must be entered in the Comments Section of AOSOS, for each quarter (documentation may include check stubs or employer verification, email, etc.).
 - **Follow-Up Contact Information Collection:** When follow-up contact is made, inquiries on employer, wage, hours, position, address, phone, and other contact numbers, and name changes must be updated and recorded in the Comments Section of AOSOS. (Note: Contact with a youth's employer or advisor should only be made with youth's express knowledge and permission.)

- **Post-Exit Employment Documentation:** The youth does not have to be employed by the same employer as the employer with whom they were working when the youth exited. If the employer changes, this new information is to be recorded in the Comments Section of AOSOS and in the Outcomes Screen of AOSOS as new employment.
- **Final Close-Out Steps:** After the 12-month follow-up is completed, all files are to be reviewed again for accuracy in all areas (eligibility documentation, ISS/action plan, Case Notes) before the participant name is removed from the case manager's caseload list and the file is placed into storage. Exit files must be retained for no less than seven years.

6.2 Adult and Dislocated Workers Program: As with youth participants, Case Notes for participants in the Adult and Dislocated Workers Program must be entered in a timely manner for every point of contact with the participant, including emails, phone calls, letters and mail-outs. Additionally, the subject must be distinguishable, such as Individual Training Account (ITA) payment, ITA check request, Support Service Request, Support Service Payment, behavior during workshop, follow-up, etc. Below are specific Adult and Dislocated Worker Case Note requirements:

1) Initial Case Notes: Must include the following:

- Employment status; household income and family size;
- Summary of eligibility (including what documentation is missing);
- Plan of activities to be offered (how will activities be implemented?);
- Job skills participant would like to enhance; workshops participant is encouraged to attend;
- Identified barriers; and
- Instructions on next steps along with date and time for next appointment.

2) Training Case Notes: Must include the following:

- Pre-training (Has the participant gathered all documentation relevant to training? What's missing?);
- Waitlist Information² (Does the participant have to be waitlisted?);
- Financial Aid eligibility (e.g., Was participant denied a Pell Grant?);
- Approved training, including the type of program (e.g., area of study), credential type, and the anticipated end date of the training;
- All waivers requested and approved;

² When funding is limited or near depletion, it is important for local areas to follow the Priority of Service policy (NJWIN 5-15)

- All changes to the participants training (e.g., program switch, stop-gap);
- Dropped out of training with reason (e.g., if any credential was received);
- Completion of training, indicating the degree of certification attained, including the date attained; and
- All check requests and payments made charged to the Individual Training Account (ITA).

3) Adult and Dislocated Worker Exits and Follow-Up: When additional activities occur during the 12-month post-exit period, updates must be made in AOSOS and documented in Case Notes:

- Participant employment exit information, including place of employment, number of hours working, wage and position;
- Document all action plans, activities, and training has been completed;
- Follow-up activity must be documented at least quarterly during the 1st through 4th quarters after exit, including employer, wage, hours, position, address, phone, contact numbers and any name changes; and
- Any assistance the participant may need to maintain or re-gain employment.

NOTE: For more detailed information about “Best Practice” customer exit and follow-up procedure, see the requirements detailed in the Youth section.

7. ENTERING CASE NOTES INTO AOSOS:

Case Notes can be entered in three (3) sections within AOSOS: Customer Detail Comment Section; Comprehensive Assessment Comments Section; and Counseling Statement Comment. Below are examples:

7.1 Customer Detail Comment Section: This section generally consists of one-to-three sentences that explain the progression of customer services, and does not include personal information. See edited, truncated example below:

- 9/1/19-Customer attended a training workshop and was given **/**/** return date for testing.
- 9/17/19-Customer given appointment date for **/**/** with Counselor for WIOA training assessment.
- 9/25/19-Customer reported for Assessment; ABT determination made (see counseling statement).
- 10/1/19-Customer to begin soft skills training **/**/** with anticipated end date of **/**/**.

- 11/5/19-Customer returned for scheduled appointment. Has chosen a field but wants to change school. School approved. Contract signed. (See employment plan.)
- 12/1/19-Verified start in training – WD-24 sent for ASW/ABT.

NOTE: The above may not be the flow in your office; the comments are just an example of the general tracking that should go in the Customer Detail Comments Section.

7.2 Comprehensive Assessment Comments Section: This section is for detailed comments that may contain sensitive information explained in general terms.

- 9/1/19-Customer stated at training workshop they had previously attempted training for CNA at XYZ school in 2016, but never took the certification test.
- 9/8/19-Customer reported legal issues during IEP/RESEA (See counseling statement).
- 9/14/19-Customer scores sufficient for training. (> 12th grade on all levels.)
- 9/25/19-Customer eligible for training under WIOA DW. Career choice is Culinary which suits clients background due to legal issues (See counseling statement 9/8/19).

7.3 Counseling Statement Comment: This section may provide details about the sensitive information mentioned in the Comprehensive Assessment Section. These notes are secure and are only accessible to the approved Employment Counselors. Examples are provided below:

Sample Counseling Statement #1: Married no dependent children. Customer was a senior lab technician in R&D for J&J. Laid off mm/yy after 35 years. Customer has some college and in-house training. Customer tested new products and developed prototypes. Wants to return to work as a lab tech, but struggles to organize her job search. Reviewed customers resume, suggested some changes, and discussed developing a second resume if she decides to look for work in another field. Has good MS Office skills and knowledge of medical terms, supervised and could do office work in a medical office, or insurance company claims processing. Demonstrated NJDOL website job-search tools and gave information about career workshops offered in the One-Stops. Reviewed interviewing skills, discussed and showed client how to organize her job search.

Sample Counseling Statement #2: Married no dependent children. Spouse is employed and providing financial support. Customer referred to NJDOL by parole officer. Customer served five years for a felony assault conviction. Prior to incarceration, customer worked four years in a warehouse filling orders and operating a hi-lo. His conviction is not relevant to his work; however, he does not have a driver's license. While in prison, customer received his GED and worked in a culinary training program. He must actively seek employment even as he meets

with WIOA for an eligibility determination for a training grant. Arranged a referral to WIOA. Reviewed developing a resume and how he might get his driver's license back. Customer will attend workshops on resume-writing and interviewing skills, and then meet again with counselor to review resume and receive continued job search assistance.

8. REQUIRED ACTION: All staff responsible for providing services to WIOA Program participants must be provided with this policy and trained on its proper implementation.
9. RESCISSION: None
10. QUESTIONS: For any questions regarding this guidance, please contact us at DCSPolicy@dol.nj.gov.
11. REFERENCES: Workforce Innovation and Opportunity Act; Section 134 (c)(2)(A)(xii)(II); 20 CFR 680.170; Work experience- CFR 681.590 & 681.600, Supportive Services- CFR 681.570, Incentive payments- CFR 681.640, Follow-up- CFR 681.580