

## Bay Consortium Workforce Development Board

**Policy Number:** 14-01

**Effective Date:** July 1, 2014

**Revised Date:** November 4, 2020

**Title:** Case Management, Case Notes, and IEP/ISS Update and Review Policy

### PURPOSE

This policy provides WIOA service providers guidance regarding the uniform electronic documentation of participant records, required naming conventions for participant documents uploaded into the system of record, adding and removing of participant documents to the system, standards for case note quality, and timely data entry requirements.

### REFERENCES

- Public Law (Pub. L) 113-128 Workforce Innovation and Opportunity Act (WIOA) of 2014
- 20 Code of Federal Regulations (CFR), WIOA Final Rules and Regulations
- U.S. Department of Labor (USDOL-ETA) Training and Employment Guidance Letter (TEGL) 10-16, Change 1 Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs
- U.S. Department of Labor (USDOL-ETA) Training and Employment Guidance Letter (TEGL) 39-11, Guidance on the Handling and Protection of Personally Identifiable Information (PII)
- E-Government Act of 2002
- Government Paperwork Elimination Act of 1998
- Paperwork Reduction Act of 1995
- Training and Employment Guidance Letter (TEGL) 07-18: Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act
- Training and employment Guidance Letter (TEGL) 23-19: Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs
- ETA-9172 - DOL-only PARTICIPANT INDIVIDUAL RECORD LAYOUT (PIRL) OMB Control Number 1205-0521 Expiration Date: 06-30-2021TEGL 14-18 -- Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL).
- VWL 20-04: VaWC WIOA Title I Data Change Requests
- VWL 20-05: Local Workforce Development Area System Administrator Roles & Responsibilities
- VWL 20-06 WIOA Participant Activity Code Definitions, Projected Durations and Use Projection Limitations
- Virginia WIOA Title I Learning Resource Rescissions



- VWL 13-07: Virginia Workforce Connection (VaWC) system of Record and Entry of Case Notes in VaWC, Including Guidelines
- VWL 16-03: Standardized Participant File Format

## DEFINITIONS

*Virginia Workforce Connection (VaWC):* The management system of record used for all data collection and reporting.

*PIRL:* The Participant Individual Record Layout (PIRL) is a standard reporting format that contains the Workforce Innovation and Opportunity Act (WIOA) common data elements and is used to report participant characteristics to the United States Department of Labor (USDOL-ETA).

## BACKGROUND

Section 185 of the WIOA requires recipients of Title I funds to keep records that are sufficient to prepare reports on program performance and outcomes, and permit the tracking of expenditures to adequately ensure that funds have not been spent unlawfully. This guidance applies to electronic file storage and documentation imaging standards in the administration of WIOA Title I programs and other federally funded grant programs.

## GUIDANCE

**System of Record** The VaWC is the “System of Record” with regard to Federal reporting for local WIOA Title I programs (Youth, Adult, and Dislocated Worker) and other USDOL-ETA grant-funded programs in the Commonwealth of Virginia. Currently, the VaWC is used to capture information on enrollment, service delivery, and performance data. The required documentation used to verify program eligibility and support service provision must be maintained in the VaWC. A newly accessible feature in VaWC, the electronic document imaging and storage system, will allow staff or local areas to facilitate the upload of supporting documentation and allow local areas to transition to paperless record keeping.

The use of electronic records will:

- Eliminate the need for storage areas and storage costs associated with paper files;
- Save supply costs;
- Provide for an easily accessible, single point of access for file review;
- Reduce staff time accessing hard copy documentation;
- Ensure more secure storage of sensitive information;
- Eliminate lost or misfiled paper documents;
- Improve the consistency of file documentation.

### *Electronic Case Files*

Beginning December 1, 2020, and moving forward, all WIOA Contractors must record and document activities for all new participants enrolled in WIOA Title I (Youth, Adult, and Dislocated Worker) programs, and applicable discretionary grant programs, in the VaWC to ensure compliance with federal and state statutes, regulations, and policies.



The electronic records shall include the following in the appropriate section of the VaWC:

- Program applications;
- Eligibility determinations;
- Activity and service codes;
- Individualized Employment Plan (IEP) or Youth Individualized Service Strategy (ISS) utilizing the VaWC system generated planning module;
- Case notes;
- Case closure;
- Outcome (Exit) information;
- Follow-up;
- Documentation supporting eligibility, service delivery, and closure.

The electronic records will be made available to any staff from the USDOL-ETA, State auditor, or VCCS monitor and BCWDB program staff who requires access to carry out their official duties. Information will be made available in the VaWC system for new WIOA Contractor staff after completing the system access form.

#### *Timely Entry of Data and Documentation into the VaWC*

The VaWC serves as the basis for reporting to USDOL-ETA through the WIOA PIRL. Delays in data entry can adversely affect the quarterly and annual performance of the state and the local workforce areas, and result in inaccurate federal reports.

To address the impact of delayed data entry, ***all transactions (eligibility, receipt of services, outcomes, exit, and contact with participants) must be entered into the VaWC within fourteen (14) business days from the completion of the process.*** For example, once the customer has been determined eligible and has received their first service, the participation information must be entered into VaWC within 14 business days. The Primary Indicators of Performance are based on the exit outcomes of these individuals. It is imperative that accurate information is entered into the State's data management system in a timely manner in order to generate appropriate reports at the State and Federal levels, as well as Bay Consortium Area Reporting; (including documentation to support credentials or employment attainment).

The WIOA Contractors compliance with the 14-business day rule will be reviewed by the BCWDB monitor, as well as state and federal WIOA Compliance Monitors and instances of noncompliance will be included in the Bay Consortium monitoring report as a finding.

#### *Documentation Uploads*

Starting December 1, 2020 and moving forward, all documentation for new program participants shall be uploaded into the VaWC to create electronic records. Document uploads shall be within the -14- business day timely data entry requirement. Documents will also be uploaded from the files of current active participants enrolled on or after July 1, 2020. BCWDB staff will select the appropriate verification item, type, and document description from a drop down-menu for each document. WIOA Contractor Staff shall also "tag" uploaded documents with keywords, which will allow documents to be found using keyword search. To ensure consistency, WIOA Contractor staff shall follow the naming/tagging conventions outlined in Attachment A: WIOA Title I VaWC Document Naming Conventions.

### *Case Notes*

Case notes add context to elements in the electronic case file that are not clearly evidenced, such as participant factors affecting eligibility, important details about services provided to customers, and to inform the reader about the customer's progress, lack of progress and/or obstacles associated with the services and/or referrals provided. Case notes compliment entries made in VaWC, to provide further explanations of service provided. Therefore, all case notes must be keyed in VaWC.

Case notes do not take the place of entering data in the appropriate sections of VaWC. For example, a case manager should not enter service information (service codes, start and end dates) in a Case Note rather than in the Create Activity section. Performance related information should be entered in the appropriate sections, such as Services, Measurable Skills Gains, Credential Attainment, and/or Follow-up sections. Case Notes are a planning tool and a source of documentation and information that can be used by case managers, supervisors, and monitors. WIOA files can be chosen for review by multiple entities such as the Virginia Board of Workforce Development (VBWD), the USDOL-ETA, Virginia Community College System (VCCS), and other organizations; therefore, accuracy and completeness in case notes are very important.

Case notes should tell the “who, what, where, when, and why” of the customer's needs and services. Case notes describe the actions taken and the reasons behind those actions, along with the expected results. Consider the use of case notes as the means to tell a factual story of the customer. No opinions or comments of the case manager should be included. Anyone, including the customer, should be able to pick up the file and follow the story of what is happening with the customer.

***All case notes must be entered into the VaWC within fourteen (14) business days from the date of contact.***

### *IEP/ISS Update and Review*

In an effort to review participants' changing needs and goals on a regular basis, a review of the Individual Employment Plan (IEP)/Individual Service Strategy (ISS) is necessary to address client needs and focus the plan in an appropriate direction. With this in mind the BCWDB is initiating an IEP/ISS update/review policy.

A review and update of the IEP/ISS is required every ninety (90) days at a minimum for ALL programs (Adult, Dislocated Worker, and Youth) with the following stipulations:

- The review will be documented in a VOS Case Note with the subject line reading “90 Day Update/Review”.
- The Case Note will clearly state what change(s) are needed in the IEP/ISS.
- If there are no changes/updates to the IEP/ISS clearly state this fact in the Case Note.
- The Case Note will be printed and signed by the participant and case manager and retained in the Case Notes section of the client file.
- A corresponding objective & goal will be created in the Plan in VOS

- Original hard copy of the signed IEP/ISS as well as all review/update signed case notes must be retained in the client file for review and monitoring purposes.

### *Medical/Disability Records*

Medical and disability related information, also known as protected health information (PHI) under the Health Insurance Portability and Accountability Act (HIPA) of 1996 must be kept confidential and separate from the VaWC electronic case record. Such information shall be kept in a paper file in a secure, locked location. A case note in VaWC shall contain a generic explanation of the information, how it is related to eligibility, employment, and/or training opportunities, and identify the secure location of the information. (i.e., “Participant wants to be a mechanic, but needs to pursue other employment or training. See confidential file.” or “Individual meets local adult eligibility priority of service group. See confidential file.”).

### *Records Correction and Deleting Documents*

Records in the VaWC that contain errors must be corrected to ensure accurate reporting to USDOL-ETA. Requests for data correction shall first be submitted to the Bay Consortium Area System Administrator (*Steven Golas*) for review and completion utilizing the approved data correction form from the WIOA Title I Administrator, VCCS. Any corrections that cannot be completed by the Bay Consortium Area System Administrator should be communicated to the State System Administrator via the BCWDB for review. The State System Administrator shall review the validity of the correction and communicate the appropriate action or outcome to the Bay Consortium Area System Administrator. Record corrections in third-party systems are the responsibility of the local area staff using those systems and are processed according to the local board’s policies or procedures manuals.

Only under limited circumstances will staff be allowed to delete documents from an applicant's electronic file. The process of deleting a document will be performed by the Bay Consortium Area System Administrator or State System Administrator. Program staff shall submit a request for the deletion along with the reason for the deletion. The State System Administrator reviews requests for deletion of documents and if determined appropriate will perform the deletion.

The WIOA Title I Administrator will work with the vendor of the VaWC software (Geographic Solutions) to ensure that participant documents that are stored in the system are appropriately deleted after the required retention period for the documents has expired.

### *Confidentiality of Data or Information and Required Release Forms*

Data or information acquired by an agency under a confidentiality agreement, to be used exclusively for statistical purposes, shall not be disclosed by an agency in identifiable form for any use other than an exclusively statistical purpose. The use of this information is prohibited except with the informed consent of the respondent (Public Law 107-347 Title V Section 512[b][1]). **All providers will have a release of information form signed and dated by the participant and the case manager.** The form shall state that the participant's information may be used for reporting purposes because of federal regulations associated with the benefit of federal funds and that the participant's personal information will remain confidential. The release form will be uploaded into the participant file in VaWC to validate that the participant agrees to the release of information for reporting purposes. The standardized form will also be made available by



the BCWDB staff and may be used as a stand-alone form or incorporated into other release forms used by the BCWDB.

#### *Legal Status of Electronic Documents*

Electronic records submitted or maintained in accordance with procedures developed under this title, or electronic signatures or other forms of electronic authentication used in accordance with such procedures, shall not be denied legal effect, validity, or enforceability because such records are in electronic form.

The purpose of this policy is to describe the general expectations and responsibilities for professional staff performing Case Management support for participants enrolled under WIOA programs being administered through the Bay Consortium Workforce Development Board (BCWDB).

**ATTACHMENT A**

**WIOA Title I VaWC Document Naming Conventions**

WIOA Service Providers uploading documents should name and tag their documents according to the naming convention identified below to facilitate ease of document identification and ensure consistency among staff.

WIOA Service Providers reviewing documents uploaded by individuals as part of the WIOA Title I pre-application should tag the documents according to the naming/tagging conventions below to ensure ease of document identification.

<b>Criteria</b>	<b>Documents TAG ID</b>
<p><b>Age:</b></p> <ul style="list-style-type: none"> <li>(Birth certificate, Passport, State-issued Driver’s License or ID, school records, DD-214, Green Card, etc.– must show the date of birth)</li> </ul>	<p>Examples: Birth Cert Driver’s License Passport</p>
<p><b>Citizenship/Eligible to Work:</b></p> <ul style="list-style-type: none"> <li>(Birth Certificate, Social Security Card w/ID, DD-214, Naturalization Certificate, US Passport, Employment Authorization Card w/photo). <i>See USCIS.gov for a full list of accepted documents.</i></li> </ul>	<p>Examples: Birth Cert Soc Sec Card Passport</p>
<p><b>Selective Service Registration:</b> (Required after January 1, 1960)</p> <ul style="list-style-type: none"> <li>(Internet verification, DD-214, Selective Service Telephone Verification 847-688-6888, Telephone verification form signed by the verifier and a Consent to Release Information form signed by the participant.)</li> </ul>	<p>Examples: Selective Service Internet Selective Service DD 214 Selective Service Telephone</p>
<p><b>DW-proof of separation:</b></p> <ul style="list-style-type: none"> <li>(Layoff letter, letter of closure, verification form employment agency, media announcement of layoff or closure, WARN Notice, telephone verification completed with the employer and signed by the verifier.)</li> </ul>	<p>Examples: DW (<i>Name of Document</i>) DW Layoff Letter DW Media Announcement DW WARN DW Telephone</p>
<p><b>Unemployment Insurance eligibility/payments:</b></p> <ul style="list-style-type: none"> <li>(UI documents or printout that demonstrate the individual is eligible for, or has exhausted UI benefits, or does not work for a covered employer.)</li> </ul>	<p>Examples: DW (<i>Name of Document</i>) DW UI Printout</p>

<p><b>DW-Unlikely to Return to Previous Industry of Occupation Analysis:</b></p> <ul style="list-style-type: none"> <li>(LMI showing an occupation in decline, Receipt of UI benefits for at least 12 of the previous 26 weeks, Completed and signed copy of VEC REO program, Documentation acceptable according to LWDB policy on ULTR.)</li> </ul>	<p>Examples: DW (<i>Name of Document</i>) DW ULTR LMI DW ULTR UI Printout DW ULTR REO Plan DW ULTR LWDB</p>
<p><b>DW-Formerly Self-employed:</b></p> <ul style="list-style-type: none"> <li>(Chapter 7 or Chapter 11 Bankruptcy public notice showing the date, letter from a trustee of the bankruptcy court, statement of failure from business supplier or customer, IRS forms)</li> </ul>	<p>Examples: DW (<i>Name of Document</i>) DW Bankruptcy Letter</p>
<p><b>DW-Displaced Homemaker/Military Spouse:</b></p> <ul style="list-style-type: none"> <li>(Divorce decree, IRS form, court records, bank/financial records, spouse disability check, spouse death certificate, a signed document from family - AND Employment verification (previous, current, or prospective depending on employment status, job search verification)</li> </ul>	<p>Examples: DW (<i>Name of Document</i>) DW Divorce Decree DW Court Records DW Financial Records</p>
<p><b>School Status:</b></p> <ul style="list-style-type: none"> <li>(ISY-school records)</li> </ul>	<p>Examples: School Status (<i>Name of Document</i>) (OSY-diploma, GED, school transcript/records with graduation date) School Status Diploma School Status Records</p>
<p><b>Youth Barrier:</b></p> <ul style="list-style-type: none"> <li>BSD/English Language Learner-Generally accepted</li> <li>Standardized Test, school records</li> <li>Pregnant/parenting-child's birth certificate, hospital record of birth, a statement from Dr. or social service agency</li> <li>Foster Child-court documents, Social Services letter, verification of foster care payments made on behalf of child</li> <li>Homeless/Runaway- Statement from a shelter, social service agency, court contact,</li> <li>Drop-out/not attending school-school records</li> <li>Offender-court documents, letter of probation or parole, police records</li> <li>Youth w/Disability-school records, rehab eval, Dr. statement</li> <li>Low-income OSY-needs additional assistance to enter or complete an education program or secure and hold employment – must meet local area criteria</li> </ul>	<p>Examples: Barrier (<i>Document Name</i>) Barrier School Records Barrier Child Birth Cert Barrier Court Docs Barrier Dr Letter</p>



<p><b>Youth Income (as applicable):</b></p> <ul style="list-style-type: none"> <li>(In-school Youth, Out-of-school Youth w/HS diploma who is BSD)</li> </ul>	<p>Examples: Income ISY Income OSY</p>
<p><b>Priority of Service:</b></p> <ul style="list-style-type: none"> <li>(DD-214, military service documents, a document showing spouse was veteran, TANF, SNAP, pay-stubs, a generally accepted standardized test showing BSD, documents showing barriers to employment- <i>refer to VWL 18-04.</i>)</li> </ul>	<p>Examples: POS (<i>Name of Document</i>) POS DD 214 POS SNAP Letter POS TABE Test POS Court Documents</p>
<p><b>Equal Opportunity Notice:</b></p> <ul style="list-style-type: none"> <li>(EO notice of rights signed and dated by the participant)</li> </ul>	<p>Examples: EO Notice</p>
<p><b>Grievance Policy:</b></p> <ul style="list-style-type: none"> <li>(Acknowledgment of understanding of the local grievance policy and procedures)</li> </ul>	<p>Examples: Grievance Policy</p>
<p><b>Consent to Exchange Information:</b></p> <ul style="list-style-type: none"> <li>(Consent forms signed and dated by the participant; updated forms as required according to expiration)</li> </ul>	<p>Examples: Consent Form Consent Form Rev 1</p>
<p><b>Other Local Administrative Forms:</b></p> <ul style="list-style-type: none"> <li>(Applicable if LWDA has locally required forms.</li> <li>Examples could be a photographic release form or client responsibility form.)</li> </ul>	<p>Examples: BCWDB <i>Form Name</i></p>
<p><b>Partner Referral:</b></p> <ul style="list-style-type: none"> <li>(Referrals to or from partner entities)</li> </ul>	<p>Examples: Referral (<i>Partner Name</i>) Referral DARS Referral Adult Ed</p>
<p><b>Assessments:</b></p> <ul style="list-style-type: none"> <li>(Objective assessment, basic skills assessment, Interest Inventory, School Records)</li> </ul>	<p>Examples: Assess (<i>Assessment Type</i>) Assess Objective Assess Basic Skills Pre Assess Basic Skills Post Assess Career Interest Assess School Rec IEP</p>
<p><b>Occupational Skills Training:</b></p> <ul style="list-style-type: none"> <li>Customer Choice in Training-signed by the participant</li> </ul>	<p>Examples: Training (<i>Document Name</i>) Training Customer Choice Labor Market Information Training Course Curriculum Cost Estimate Sheet Financial Aid Analysis-must be from the school Individual Training Account (ITA)-signed School Invoice Training LMI Training Cost Estimate Training ITA</p>

	<p>Training Invoice 1 (2,3,4...)          Training Payment 1 (2,3,4...)          Training ITA Packet 1 (2,3,4) (all ITA docs)</p>
<p><b>Work-Based Training (OJT/IWT/CT/WEX):</b></p> <ul style="list-style-type: none"> <li>• Agreement/Contract (signed by parties)</li> <li>• Job Description</li> <li>• Training Plan</li> <li>• Timesheets signed by participant and supervisor</li> <li>• Invoice</li> <li>• Payment w/date</li> <li>• Performance Evaluation</li> </ul>	<p>Examples:  <i>WBT (Type of Training)</i>          WBT OJT Contract <i>Employer Name</i>          WBT OJT Timesheet 1 (2,3,4...)          WBT OJT Payment 1 (2,3,4...)          WBT OJT Job description          WBT WEX Agreement <i>Employer Name</i>          WBT WEX Timesheet 1 (2,3,4...)          WBT WEX Payment 1 (2,3,4...)          WBT WEX Evaluation 1 (2,3,4...)</p>
<p><b>Supportive Services:</b></p> <ul style="list-style-type: none"> <li>• Support Service Determination Form</li> <li>• Support Service Invoice</li> <li>• Support Service Payment Voucher</li> <li>• Support Service Receipt</li> <li>• Eligibility for Needs-Based Payments</li> <li>• Needs-Based Payment</li> </ul>	<p>Examples:  <i>Supp Serv (Type of Service)</i>          Supp Serv Determination          Supp Serv Mileage 1 (2,3,4...)          Supp Serv Mileage Payment 1 (2,3,4...)          Supp Serv Child Care 1 (2,3,4...)          Supp Serv Medical 1 (2,3,4...)          Supp Serv NBP 1 (2,3,4...)</p>
<p><b>Incentives:</b></p> <ul style="list-style-type: none"> <li>• Incentive</li> </ul>	<p>Examples:          Incentive 1 (2,3,4...)          Incentive Payment Incentive Payment 1 (2,3,4...)</p>
<p><b>Measurable Skills Gain:</b></p> <ul style="list-style-type: none"> <li>• Educational Functioning Level (EFL)-standardized test</li> <li>• Learning Milestone-school transcript/report card</li> <li>• High School Diploma earned while in the program</li> <li>• Training milestone-complete OJT, complete 1-yr apprenticeship</li> <li>• Passing a required occupational exam</li> </ul>	<p>Examples:  <i>MSG (Type of MSG)</i>          MSG EFL TABE 1 (2,3,4...)          MSG HS Diploma          MSG OJT Eval          MSG License Exam</p>
<p><b>Credential:</b> (earned after enrollment)</p> <ul style="list-style-type: none"> <li>• Degree/Diploma</li> <li>• Occupational Skills Certificate</li> <li>• Occupational Skills License</li> <li>• Academic Record/Transcript</li> </ul>	<p>Examples:  <i>Cred (Type of Credential)</i>          Cred HS Diploma          Cred AA Degree          Cred RN License          Cred CDL</p>
<p><b>Closure/Exit:</b></p> <ul style="list-style-type: none"> <li>• Follow-up Contact Information</li> <li>• Employment Verification</li> <li>• Work Number or other online employment verification</li> <li>• Documentation for Global Exclusion</li> </ul>	<p>Examples:  <i>Exit (Type of Document)</i>          Exit Employment Verification          Exit Work Number mmddyy          Exit Global Court Doc          Exit Global Dr Letter</p>