NORTH CAROLINA DEPARTMENT OF COMMERCE
DIVISION OF WORKFORCE SOLUTIONS

DWS POLICY STATEMENT NUMBER: PS 01-2018, Change 2

Date: April 1, 2019

Subject: NCWorks Online Service Activity Codes and Definitions; Guidance on Case Notes and Exit Dates

From:

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Purpose: To provide updates to NCWorks Online participant service activity codes; guidance on corresponding case notes and service exit dates; and rescind Policy Statement 01-2018, Change 1.

Background: Participant service activity codes are necessary to correctly code participant services in NCWorks Online for Career (Adult Basic, Individualized, and Follow-up) and Training Services. The provision of services includes assisting individuals in their efforts to obtain and maintain employment.

All services and activities provided to Workforce Innovation and Opportunity Act (WIOA) participants are required to be documented in NCWorks Online. Each service/activity that is provided has its own individual code and definition. These services and activities may be provided by local contractors/service providers or by various outside entities such as community colleges and private training facilities. Prior to staff selecting service activity codes in NCWorks Online, service provider information must be entered for each service activity code available for selection. When service activity codes are selected, date ranges must also be entered that detail the length of time each service is provided. The most up-to-date version of the Service Activity Codes and Definitions, in addition to other relevant service code information, is located on NCWorks Online in the "Staff Online Resources" section, under "NCWorks Training Resources". Some of the service activity codes listed may not be available in all workforce centers or may not be provided based upon local Workforce Development Board policy.

WIOA Title I and Title III programs are required to document services in case notes. Exited participants should have case notes that clearly indicate the last WIOA or partner-funded service(s) received and correspond with the

"soft exit date" (defined below) in NCWorks Online. All case notes shall follow the established guidelines found in the attached "Guidance on Case Notes, Services, and Exit Dates".
In addition, all services provided during WIOA enrollment must be detailed on either an Individual Employment Plan (IEP) for Adults and Dislocated Workers or an Individual Service Strategy (ISS) for Youth. It is recommended that the IEPs and ISSs should be reviewed at least once on a quarterly basis. Updated IEPs and ISSs must be signed by the participant and uploaded into NCWorks Online. Under no circumstances should services be entered into NCWorks Online prior to meeting with the individual and discussing his or her needs as related to obtaining employment.

Rescinded

The U.S. Department of Labor requires that an individual's WIOA exit date be the date on which the last service funded by the program or partner program is received by the individual. When an individual has not received a documented WIOA or partner-funded service for 90 days, the system will "soft exit" the individual based on entries completed. Individuals who are participating in more than one program will have a single common exit date, following 90 days of no activity across ALL program enrollments. Follow-up and support services do not qualify as NCWorks Online activities that extend the exit date.

Action: Staff are to use the Service Activity Codes and Definitions, Guidance on Case Notes, Services, and Exit Dates. The most up-to-date version of the Service Activity Codes and Definitions is located on NCWorks Online in the "Staff Online Resources" section, under "NCWorks Training Resources".

Effective Date: Immediately

Expiration: Indefinite

Contact: Regional Analysts, Field Services Program Staff

Attachment 1: Guidance on Case Notes, Services, and Exit Dates in NCWorks Online

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The purpose of case notes is to tell a narrative (a detailed story) of a participant's history of participation so that another employee, supervisor, or monitor is able to understand the activity that has occurred. This includes barriers, planned activities, actions, and follow through from the case note narrative.

Active enrollment in WIOA, Titles I and III in NCWorks Online is contingent upon participants being involved in the continuous provision of service activities. While documenting services in case notes is important, it **does not** keep participants enrolled. Case notes are vital for detailing what is being provided to participants and justifying WIOA enrollment. They are also necessary for source documentation purposes in data validation. Several data validation elements, such as last date of service, last date of training, and employment at participation may be verified with case notes.

A separate case note must be entered in NCWorks Online to document every point of contact with a participant. All conversations and events should be recorded in a case note as soon as possible after their occurrence. The subject of the note should be easily identifiable and distinguishable. Case notes should always be factual and not reflect personal opinions. If an opinion is necessary, it must be relevant to the individual's WIOA participation and progress and must be labeled as an opinion.

The following items DO NOT constitute a WIOA service nor contact with a participant:

- Leaving messages on telephone answering machines for the participant.
- Speaking with a participant's relatives.
- Sending flyers, letters, or postcards to the participant.
- Speaking with a participant's probation/parole officer.
- Having a casual (unrelated to the program) conversation with the participant in public (e.g., in a retail store).
- Having the participant simply bring in time and/or attendance records for payment - when no "meaningful" service/discussion/guidance was provided.
- Sending "contact me" or "contact our offices" messages via email, U.S. Postal Service, or telephone.
- Regular contact with the participant or employer to ONLY obtain information regarding his or her employment status, educational progress/status, need for additional services, or income support payments; there must be "meaningful" service provided.
- Commentary/opinions on participant's personal circumstances that are unrelated to employment and training activities and pursuits.

The specific details included in each case note will vary depending on the type of activity that is being recorded and the individual participant's situation. In general, case notes resulting from interactions with the client should include the following elements:

- Description of the context of the interaction (e.g. Participant dropped by office after school, participant responded to Case Manager's request for meeting, etc.)
- Purpose of the interaction

- Content of the conversation
- Outcome of the interaction (e.g., Was the purpose achieved? Were other objectives achieved?)
- Plans for next steps or next meeting

At a minimum, case notes that document services should answer the following questions in order to meet data validation standards:

- When was the service delivered or provided?
- What did the Case Manager do for the individual or what partner funded service did the individual receive?

Case notes must be clear and easily understood. Someone with no contact with the participant should be able to read the case notes and get an accurate picture of the situation/circumstance being documented. Case notes should reflect the participant's work and progress throughout his or her enrollment/journey in the program. There should not be gaps in either time or information. The information documented in the case notes and the rest of the online file (i.e., service code dates and documentation uploaded should reflect the same information.

Here are a few rules to follow to ensure that your case notes are objective observations:

- Record only facts accurately and completely. For example, behaviors you observed and statements you heard.
- Do not pronounce judgment upon what you observed/heard. Never include opinions, stereotypical comments, or any offensive statements.
- If you must state an opinion relevant to the individual's WIOA participation and progress, be sure to label your statement as an opinion.
- Use clear, simple, concise language, including professional terminology. Proper English grammar and spelling should be used.
- Do not use slang or street language, clichés, or jargon.
- Avoid metaphors or similes; just say what you mean directly.
- Do not comment on details that are not relevant to the individual's participation in WIOA activities. Keep documentation focused on how events in participant's life will affect the plan and the ultimate goal of employment.

When documenting problems, also include solutions. For example, if you say "*Participant not making progress*", then also suggest what you are doing to remedy the situation. For example, "*Participant is not making adequate progress. I spoke to him about training. He will receive individual tutoring in math and language to see if the situation improves.*"

In your case notes, you are not just representing yourself and your interactions with a participant; case notes are legal documents that are also used to represent the local WIOA program and its compliance with federal, state, and local policies. View all case notes as a potential legal document. Case notes can and have been used as evidence in court. Ask yourself as you are writing, "Would I want what I am writing to appear in court?"

TYPES OF CASE NOTES:

The following is not an exhaustive list of all possible types of case notes. Individual details may vary depending on the individual participant characteristics and the specific details of the case.

A. Initial Case Note

This case note is critical as it documents registration into NCWorks Online activities and as such will be reviewed during monitoring and data validation activities. This initial case note must contain the following:

- State whether participant is employed, not employed, or employed but received notice of termination or is a transitioning service member necessary for data validation requirement).
- Indicate whether the participant was referred for further services - beyond Basic Services - AND why.
- Indicate information on any assessments provided and those scores.

B. Employer Job Development Contacts

This case note is required whenever an employer contact is made on behalf of a WIOA participant. Such contacts should be for the purpose of assisting a participant in finding work with this particular employer. Each time this service is provided, identify the specific employer(s).

C. Workshops or Group Activities

Many WIOA services are delivered in group or workshop settings. When a participant participates in a workshop or group activity, information regarding the activity must be included in the case note.

- Include the title, date, and location of the workshop. For example: *"Participant attended the Orientation of Service Overview, September 8, 2017, NCWorks Career Center, Raleigh."*
- Briefly describe the purpose of the workshop or group activity.

D. Individual Employment Plan (IEP)/Individual Service Strategy (ISS) Planning and Update

This case note is required for all participants who are determined to need individualized career level services. This will include all activities in which updates or additions to the IEP/ISS are planned. Each time a participant participates in IEP/ISS activities, the following information must be documented in a separate case note:

- Describe the specific IEP/ISS planning activities in which the participant participated.
- Describe the services that have been planned for the participant and how these services will help the participant achieve documented goals.
- If entering into any training activity:
    - State the training/employment goal.
    - Describe the specific training schedule, including a beginning and end date.
    - Identify the planned provider for each training activity.

- Describe the rationale for referring the participant for training services.
- Statement "This IEP has been jointly developed with the participant" must be included with the note.

E. Youth Program Participation

This information is documented when a youth is determined eligible for the WIOA program and receives an activity provided under one of the fourteen program elements. This is known as the participation date and must be documented in the case note. In NCWorks, this first activity will be Service Activity Code 417: Comprehensive Guidance and Counseling. The length of a youth's participation should be appropriate to his or her needs, as identified through and objective assessment and as documented in the Individual Service Strategy (ISS).

F. Work Experience

This case note is required to document when a participant is participating in a paid or unpaid work experience. Each time a participant participates in this service, the following information must be documented in the case note:

- Describe the specific Work Experience activity in which the participant is participating (worksite, wage, maximum allowable hours, brief summary of work being performed, supervisor, etc.)
- Describe the specific skills that the participant is to acquire as a result of participating in the Work Experience.
- Describe how this Work Experience will help the participant attain his or her employment goal.

G. Occupational Skills Training

Training activities covered include specific occupational training programs (must be on local occupations in demand list) at approved post-secondary training institutions. Each time a participant receives these services, a case note is required and must document the following information:

- Summarize why this training will be beneficial to the participant in obtaining/retaining employment.
- Describe the specific training program the participant will be attending and the training institution that will provide the training.
- Detail the status of any Pell grants and/or other sources of financial aid that is available to the participant. If the participant has selected training that is not Pell eligible, this fact should be documented.
- Describe the skills that the participant is to acquire as a result of the training activity and how these skills will assist the participant in attaining their employment goal.

H. On-the-Job Training (OJT)

OJT activities occur when an employer hires a participant and WIOA funds are used to pay a percentage of the participant's wages during the learning or training period. Each time OJT activities are provided to a participant, a case note is required and should document the following information:

- Document the OJT position in which the participant is completing and the specific employer that will provide the OJT experience.
- Summarize the participant's need for the service based on the results of the Objective Assessment.
- Document the skills that the participant is to acquire as a result of the OJT activity and how these skills will assist the participant in retaining his or her new job.

I. Supportive Service

Supportive Services are expenditure services that are designed to reduce barriers that prevent participants from participating in training or work activities and as such must be documented in a case note. Each time a participant is provided this service it must be documented in a case note that includes the following information:

- Document the participant's need for the supportive service, including the specific barrier that the supportive service will address.
- Document the efforts made to secure the needed supportive service from other community organizations.
- Document the specific supportive service that is to be provided.
- Record the obligation amount in NCWorks Online attached to each supportive service case note.

J. Incentive Payments

Document in case notes all incentive payments including what particular goal or milestone was obtained, date incentive was presented to participant, the specific incentive provided, and the date the milestone was achieved.

K. Partner Service

Services that are provided to participants through a partner agency are required to be documented in a case note and must include the following information:

- Document the partner agency and the specific service that is being provided.
- Document how these services will assist the participant in attaining his or her education or employment goal(s).

L. Document or Update Participant Progress

As case mangers follow up with participants, there will often be new or progress information that is obtained. This information must be documented in a case note and must briefly document any new information learned relative to the participant's progress in his or her learning, job search, work experience, or any other planned WIOA activity.

VOIDING OR DELETING A SERVICE

A service is voided or deleted in the system when it is added in error. If local area policy allows for a service to be deleted, contact your Superuser. A case note must be added detailing why the original service was voided or deleted.

CLOSING A SERVICE

When an enrolled participant reports completion of an open service/activity, the service/activity should be closed by the Case Manager recording the last date of activity, the appropriate completion code, and the following information recorded in a case note:

- Document that the participant is no longer receiving this particular service and the actual completion date.
- Document the participant results from having been enrolled in this particular activity.

The expectation is that services will not be system closed. Any corrections to service dates and/or entering services after 15 calendar days must be completed by a supervisor.

CASE CLOSURE

When a Title I (Adult, Dislocated Worker, and Youth) or TAA case is being prepared for exit, a case note needs to be added for that program that includes the following information:

- Date of the last service that was provided to the participant in the particular program along with pertinent details of the contact that occurred during that last service.
- Documentation that if a credential or sustainable employment was gained based off IEP/ISS goals or if it is anticipated during the follow-up period.
- State if the participant was made aware of follow-up services offered.

NCWorks Online is designed with a Common Exit feature to facilitate the DWS reporting to USDOL of our WIOA performance. This means that a participant in any WIOA program (Title I, Title III, or TAA) cannot exit (and be counted in performance) until they are no longer being served by ANY program. A participant's exit date carries across all programs and is based upon the last date of service from ANY of the common programs, regardless of the last date of service from a particular program. This makes it of utmost importance to ALWAYS case note every contact with a participant. Due to Common Exit, it is understood that the actual exit date of a participant may be later than the last date of service for any one program. However, the case notes should reflect the last date of service for each particular program.

- Staff are to set alerts in the system and use case management reports such as the Soft Exit report so that they are aware of cases that are nearing soft exit.
- Modifications to the soft exit can be completed by the Regional Analyst within 15 calendar days of the date the soft exit is recorded in the system. Any request for modification to the soft exit by the workforce board must be accompanied by an explanation, prior to any modification of the soft exit taking place.

- Hard exits, in which a qualifying global exclusion (see TEGL 10-16) or retirement is entered, can be removed by the Regional Analyst within 15 calendar days from the date the exit is recorded in the system. Any request for removal of the hard exit by the workforce board must be accompanied by proper written justification, prior to the removal of the hard exit taking place.

After 15 calendar days from the date the soft exit is recorded in the system, the WDB superuser must send the request for modification of any type of case exit to the Regional Analyst. The Regional Analyst then forwards it to the Director of Performance and Accountability who, in consultation with the Director of IT, will consider it for approval. The workforce board must supply proper written justification prior to the modification of the case exit. The Regional Operations Director must be copied on the request. The final decision on the modification of the soft exit will rest with the Division to ensure that there is no impact on federal reporting. Modifications will not be approved after the end of a Program Year for cases that have soft exited during that Program Year.

Rescinded