

Ohio Department of Job and Family Services
Mike DeWine, Governor
Kimberly Hall, Director

The Office of Workforce Development



Case Planning and Documentation:
Good Service Delivery and Good Record-Keeping Go Hand-in-Hand

April 28, 2020

BUILDING Ohio's Workforce CREATING Innovative Solutions PROMOTING Economic Independence and Growth 1

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Today's session

Principles of WIOA service delivery and practical guidelines for documenting it:

- Individual Employment Plans (IEPs)
- Eligibility for training services
- Customer choice about training opportunities
- Supportive services

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Background

- USDOL ETA routinely conducts monitoring visits in order to assist states and local areas in providing high-quality services.
- Lessons learned from recent monitoring visits provide feedback around common issues at the state and local levels.

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A Solid Foundation

Underlying principles of WIOA . . .

- Customer-centered coaching and advising
- Planful process
- Informed decision-making
- Customer choice

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A planful case management/coaching process

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graph LR; A[Assessment] --> B[Planning]; B --> C[Service Delivery]; C --> D[Changes (as needed)]; D --> E[Results]
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Individual Employment Plans

IEPs are central to the service delivery process:

- The basic instrument to document the appropriateness of decisions made about the mix and combination of services for the customer.
- A single point of reference showing goals, achievement objectives and services.
- A roadmap for the customer, staff and administration.

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Individual Employment Plans

Requirements:

WIOA section 134(c)(2)(A)(i)(xii) and 20 CFR 680.150

- Requires that appropriate career services be made available in order for an individual to obtain or retain employment, including the development of an IEP.

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Individual Employment Plans

Requirements:

WIOA section 134(c)(2)(A)(i)(xii)(II) and 20 CFR 680.170

- Provides that an IEP:
 - Is created jointly by the participant and the career planner, when determined to be appropriate.
 - Identifies:
 - employment goals
 - appropriate achievement objectives
 - appropriate combination of services for the participant to achieve the employment goals.
 - Is an ongoing strategy between the participant and the career planner.

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Individual Employment Plans

Requirements:

WIOAPL (WIOA Policy Letter) 15-08.1 *Career Services for Adults and Dislocated Workers*

- All participants who receive an individualized career service or a training service (pursuant to WIOAPL 15-09) must receive an IEP.
- IEPs must be reviewed with the participant to ensure the IEP is effectively addressing the needs of the participant.

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Individual Employment Plans

Good Practice:

- Plans are complete and include required elements.
- Show that individuals were assessed for goals, achievement objectives and services needed.
- Address customer strengths and barriers.
- Goals and strategies are specific to each unique individual.
- Don't cut and paste from one IEP to another.
- Be specific about jobs/occupations, type of training needed for those jobs.
- Show that customer was engaged in development of their career plan.
- Treat as a "living document" - maintain and update as needed.
- Plans and entries are properly dated.

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Eligibility for training services

While there is no longer a required "sequence of services" as we had under WIA, there is still a path to be followed.



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Eligibility for training services

Requirements:

20 CFR 680.220(b):

- Files must contain a determination of need for training services under 20 CFR 680.210 as determined through an interview, evaluation or assessment, or career planning informed by local LMI, training provider information, or through any other career services received.
- If career services are not provided before the training, the local area must justify its determination to provide training.

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Eligibility for training services

Requirements:
 20 CFR 680.210:

- Individuals may receive training services when:
 - A one-stop OhioMeansJobs center or partner determines they:
 - Are unlikely or unable to obtain or retain employment that leads to self-sufficiency or wages comparable to or higher than wages from previous employment through career services,
 - Are in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment,
 - Have the skills and qualifications to participate successfully in training services.
 - They select a program of training services directly linked to the employment opportunities in the local area or planning region, or in another area to which they are willing to commute or relocate.
 - Unable to obtain grant assistance from other sources.
- If training services are provided through the adult funding stream, are determined eligible in accordance with the state and local priority system.

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Eligibility for training services

Requirements:

WIOAPL No. 15-09.1 *Training Services for Adults and Dislocated Workers*

- Staff must determine the appropriateness of a participant to pursue a program of training services. Staff must gather and document enough information to justify the need for training services. The policy requires that the participant case record must contain a need for training services.
- Training services provided shall be directly linked to an in-demand industry sector or occupation, or one with a high potential for sustained growth in the local workforce area or planning region, or in another area to which the individual would be willing to relocate (see WIOAPL 15-11.1 for guidelines).

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Eligibility for training services

Good Practice:

- Provide evidence of assessment to determine:
 - unlikely/unable to return to work,
 - in need of training to obtain, retain employment.
- Show Labor Market Information in file to support why training program was selected.
 - Training is aligned with a targeted industry sector and opportunities in the local area/region.
- Indicate that participant receiving such training would acquire an essential skill or receive an industry-wide recognized credential that would lead to a particular job in a specific sector.
- Even if other career services not provided, we must still justify training services.

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Customer Choice

Requirements:

20 CFR 680.340(a) and (b)

- Training services to be provided in a manner that maximizes informed customer choice.
- Each local workforce area must make the State list of eligible training providers available to customers.

20 CFR 680.340(c)

- An individual who has been determined eligible for training services may select a provider after consultation with a career planner.

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Customer Choice

Good Practice:

- Discuss choices and assist the customer in developing a well-informed career plan.
- Connect how chosen training addresses career goals in IEP. Customers should be able to articulate this.
- Document that participants viewed the state list and consulted with a case manager in making training provider selection.
- Local policy may include additional requirements regarding use of the training provider list.

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Supportive Service

Requirements:

20 CFR 680.910

- Supportive services may only be provided to individuals who are:
 - Participating in career or training services.
 - Unable to obtain supportive services through other programs providing such services.
- May only be provided when necessary to enable individuals to participate in career services or training activities.

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Supportive Service

Good Practice:

- Fully address all of a customer's supportive service needs.
- Use a robust network of referral organizations.
- Follow any local Workforce Development Board policy that guides and establishes limits on the provision of supportive services.

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Documentation

Good case documentation is important . . . if the information is inaccurate or incomplete, we have not adequately told the customer's story, nor have we justified the proper use of WIOA funds.

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Documentation

- Good case notes are an important part of your overall documentation process.
- For Adults and Dislocated Workers they can be entered into:
 - OWCMS Case Notes Section
 - Customer's Case File



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Case notes are an indispensable, continuous record of your interaction with the customer,
Providing:

- Documentation of Services
- Clarification and Planning
- Tracking of Progress
- Service Plan Adjustment
- Accountability

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Case notes should help the reader understand the decisions, made in concert with the customer, about how we are going to address their needs:

- Shows planned & appropriate service strategy with the customer
- Demonstrates working with partners (referrals)
- Justifies use of resources (ITAs, OJTs, supportive services)

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Tie documentation/case notes to coaching and decision making

1. When assessing, state any pertinent information that could impact achievement of a customer's goals.
2. When planning, make sure the intended activities and services connect to assessment results and customer goals.
3. Be clear about what is to be accomplished by you and the program, and what is to be accomplished by the customer.
4. When referring to a partner or agency, state why and what the expected outcome is.
5. Note accomplishment of activities and milestones leading to completion of goals.

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Tie documentation/case notes to coaching and decision making

6. As you track progress, note customer behaviors and unanticipated needs/barriers and how you will plan to address them.
7. Note consultation with partners to determine if the plan is working or what other actions may be required.
8. Note modifications to the customer's plan . . . and why.
9. Especially for anything that incurs a cost, notes should help justify why we are spending these funds.
10. Note how decisions connect to board, agency or program priorities (in-demand jobs, career pathways, special grants, local initiatives).

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Opioid grants - OWCMS

For Opioid Grant activity/training/service provision - be sure to enter data into the appropriate Special Grant Office in OWCMS.

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Resources

[WIOAPL 15-08.1](#) Career Services for Adults and Dislocated Workers

[WIOAPL 15-09.1](#) Training Services for Adults and Dislocated Workers

[WIOAPL 15-11.1](#) Use of Individual Training Accounts (ITA)

[Procedure Document: Opioid Emergency Recovery Grant into WCMS](#)
Instructions for entering services under the special grant office in the state's workforce case management system.

[Case Notes Guidelines in OWCMS](#) The importance of adding case notes while learning the requirements and techniques of a new writing style called the 5 STAR method. *(Running Time 24:00. Posted 10/29/2018)*

[Documentation Management](#) - Applying the concepts of case documentation framework and making case notes more thorough and robust. *(Running Time 27:00. Posted 09/20/19)*

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Questions?
Please contact
WIOAQNA@jfs.ohio.gov

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