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Case Notes Policy
#P-34-11.23

Re:	Guidance on standard case note practices.
Most Recently Updated:	February 24, 2026
Updates Approved:	Approval is not required at this time.
Originated:	November 29, 2022
Originally Approved:	February 8, 2024
References:	Workforce System Policy No. 05-2015 CWDS 2.0 Case Notes Best Practices TEGL 23-19, Change 2 TEGL 23-19, Revised Attachment II
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I. Definitions:

A. Case Notes:

- **i.** Case notes are the chronological records of interactions, observations, and actions involving a WIOA participant
- ii. Case notes "tell the story" of the participant's experience.
- iii. Case notes record everything that happened with a participant during their participation under the WIOA program, including Follow-Up.
- iv. Case notes refer to either paper or electronic statements created by a case manager, business services consultant, intake specialist, or training specialist that identify, at a minimum, the following:
  1. A participant's status for a specific data element;
  2. The date on which the information was obtained; and
  3. The name of the case manager who obtained the information.

B. Cross-Match: A cross-match requires grantees to identify detailed evidence that confirms the data element in a secondary database. Grantees must also confirm supporting information such as dates of participation and services rendered. Grantees must have data sharing agreements in place as appropriate.

C. Electronic Records may include:

- i. Participant Source Documents: Participant source documents are maintained in the grantee's management information system (MIS) or other official record-keeping system.
- ii. Grantee participant service record: Grantee participant information generated and maintained by the grantee regarding the specific services received by a participant. The

information may be generated and maintained through the grantee's MIS or other official recordkeeping system.

D. Self-Attestation: Self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. DOL broadly interprets what is considered an electronic/digital signature. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response is considered an electronic signature or verification; it must be participant-generated and traceable to the participant. Grantees must retain documentation of the self-attestation.

II. Policy Relevance:

A. Under the Workforce Investment and Opportunity Act (WIOA), case managers, intake specialists, business services consultants, training specialists, career advisors, and talent engagement specialists must document a record of interacting with individuals to assess skills, identify vocational interests, remove barriers to education and employment, and ultimately place eligible participants into long-term, sustainable employment.

B. This policy requires representatives of SCPa Works to adequately listen and respond appropriately to WIOA participants, providing them access to resources, tools, and skills to help them obtain employment, taking into account existing barriers, and accurately documenting in CWDS the activities associated with these interactions, including action steps taken, and future steps anticipated.

C. This policy emphasizes that when services are entered into CWDS, and at the time an IEPI/ISS is authenticated as required by state policy, it is also a requirement that these activities are documented in detail through case notes in CWDS, and that service dates and IEP/ISS authentication dates match in the system of record.

D. This policy also provides guidance for Temporary Assistance for Needy Families (TANF) training voucher administrators, TANF Youth service providers, and EARN staff within the SCPa Works service area.

III. Case Note Purpose:

A. To ensure that activity is documented between the case manager and the participant, illustrating that progressive steps are taken toward fulfilling the participant's vocational needs and goals.

B. To serve as a record of accountability for the case manager and the service provider organization.

C. To provide continuity of service in the instance of a change in the case manager or the need for an adjacent department or staff member to facilitate the vocational activities or benefits.

D. To record the details of services and advice provided to the client.

E. To document the client's participation in activities and progress.

F. To capture nuances regarding factors affecting eligibility and other information of note.

G. To justify services recommended and potentially provided.

H. To provide a focal point for monitoring service delivery's progression and effectiveness.

I. To protect the case manager and organization from potential legal issues.

J. To provide a narrative supporting allowable costs in alignment with 2 CFR 200 cost principles.

K. Case notes may be used for many of data elements as noted in TEGL 23-19, Attachment II.

L. To meet the needs of migrant and seasonal farmworkers and their dependents, vendors should incorporate the use of self-attestation or case notes to meet participant needs and increase access to program services.

IV. Case Note Overview:

A. Exemplary case notes lead to effective case management.

B. Effective case management requires direct and regular communication with the customer.

C. Case notes should document a chronological history of contact with the customer, tracking what has occurred in the case.

D. Case notes record concisely and accurately the information conveyed by the customer, requests

made by the customer, the information given by the case manager, and the employment plans mutually agreed upon.

E. Quality case notes help prevent misunderstandings and ease the resolution of conflicts in service.

V. Case Note Requirements:

A. Case notes must:

- **i.** Capture services, present the current situation of an individual, identify current barrier;
- **ii.** Provide sequential tracking and reporting of customer contact and progress to build their story;
- **iii.** Link services to the individual's deficiencies and barriers that are presented;
- **iv.** Provide the story behind revised employment plans;
- **v.** Increase accountability to allow for oversight and monitoring;
- **vi.** Fulfill an ethical requirement of helping professions;
- **vii.** Assist another employment specialist in helping the participant; and
- **viii.** Be entered within five calendar days from the event, contact, attempt, correspondence, service, etc.
  1. If a case note is created after the allowed five days, it must explain why the five day policy was not followed.

B. Case notes are required to include:

- **i.** Date;
- **ii.** Method of contact (phone, email, face-to-face);
- **iii.** Staff member's names and the names of other relevant individuals;
- **iv.** Location (agency site or other);
- **v.** Reason for meeting or communicating, including a description of discussion points; and
- **vi.** Measurable details to include a description of the desired or intended outcome, barriers or resolutions, action plans, goals or next steps, completion dates, and impact toward meeting IEP objectives.

C. Case notes must be created for services entered into CWDS, demonstrating the amount of contact a professional has with their clients and the level of service being provided to a customer.

D. The frequency of case notes should be at a minimum, once every 30 days, in addition to the entry of services, IEP updates, and additional contact made with the participant, employer, and training provider.

VI. Case Note Quality:

A. Timeliness

- **i.** Capture action items, observations, thoughts, and duration following a meeting or call with the participant as soon as possible to ensure accuracy.
  1. This includes the documentation of new test scores, a job interview, a period of absence, workshop attendance, etc.

B. Coherency

- **i.** Entries should be sequential, telling a story that a compliance officer, colleague, leadership, and other staff can read clearly and understand.

C. Clear and Concise

- **i.** Write for the benefit of others as if you will not be available for consultation.
- **ii.** Remain factual, concise, thorough, relevant, and logical, applying well-organized and well-written statements using clear language.
- **iii.** Avoid slang, jargon, opinions, judgments, or generalizations.
- **iv.** Use good grammar and spelling.
- **v.** Do not leave anything to interpretation.

D. Consistency

- **i.** From sequential case note to case note, there should not be gaps in either time or

information.

ii. Case notes should reflect the participant's work and progress throughout the program.

iii. The case notes and the rest of the file should match and reflect the same information as the test scores, start date, revisions, supportive services, etc.

E. Legality and Analysis-Based

i. Case notes should adhere to anti-discrimination and conflict of interest standards.

ii. Case notes should not contain information that does not directly apply to the participant's IEP, a participant's medical history, or a medical or mental health diagnosis.

iii. Write with the knowledge that the case note will be audited or reviewed for compliance.

iv. Information that could lead to the disclosure of the specific medical condition or disability of a participant cannot be entered into CWDS case notes.

1. Case notes may state in a general statement that a medical condition or disability exists but cannot provide information describing the condition or include the name of the condition.
2. The case note should summarize that there are generalized barriers to employment instead of listing the specific sensitive information.
   a. Notations of confidential information can be included in a case note indicating that confidential files are kept in a locked cabinet away from the general physical files and managed by the lead case manager.

VII. Parts of a Case Note

A. Subject Line

i. The subject line of the case note should include the name of the service provided or, if no specific service is provided, a summary line of the action that occurred to prompt a case note.

B. Background Statement

i. The body of the case note must describe each service or the action that occurred and include elements mentioned earlier in this policy.

ii. A background statement of required documentation and participant information can include eligibility details, work history, assessment, barriers, career research, referral dates, and service provider/agency names.

C. Reason Statement

i. This is a statement of the main purpose of meeting with the participant and the established goal of the meeting.

ii. Include specific, measurable, observable goals and the participant's ability to attain those goals.

D. Observation Statement

i. This is a statement of what was witnessed during the meeting or what was observed through a phone call.

ii. This statement can include a participant's general attitude, progress, willingness to take steps toward a goal, and eagerness to move on to the next stage of the program.

E. Content Statement

i. This statement includes the action taken during the meeting.

ii. This statement indicates if the customer self-identifies barriers, changes, or other issues.

iii. This statement details supportive services and program referrals.

F. Results Statement

i. This statement details what the meeting achieved or did not achieve.

ii. This statement should include a professional assessment of progress, goal statuses, service exits/outcomes, and placements.

G. Plan Statement - Next Steps

i. Each case note should document what actions the customer and staff will complete before the next contact. Include the date and time of the next scheduled meeting and how the meeting will take place (e.g., in person, virtually, by phone, etc.)

Summary of Changes: This policy is reviewed every 180 days by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date
07.03.2024	Saranne Miller	Section I – added definitions Section III(K)&(L) – added TEGL updates	08.01.2024
02.24.2026	Saranne Miller	Reformatted entire narrative outline – board approval not needed.	02.26.2026