

Policy Memorandum 2019-03

Case Management - Effective April 1, 2019

INTENDED AUDIENCE:

AAWDC staff and subgrantees who provide direct case management services to participants through the local workforce development system and regional grants managed by AAWDC

SUBJECT:

Case Management Policies and Guidelines

EXPIRATION:

N/A

QUESTIONS:

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CANCELLATIONS

This policy supersedes and replaces any local conventions in effect by AAWDC initiatives or administrative offices.

The following policies are replaced by this guidance:

2013-03

Case Management Policy

2017-07

IEP Policy

2016-AJC-06

WIOA Enrollment and Exit Policies

STANDARD OPERATING PROCEDURES

FORMS

Initiative-specific Enrollment Process Initiative-specific Case Closure Process Tool – Initiative-specific Case Management Service Map Tool – AAWDC Assessment Tools and Diagnostic Tests

Approvals

President and CEO, AAWDC

General Information

The initiatives and grants that the Anne Arundel Workforce Development Corporation (AAWDC) manages require case management staff to interact with individuals to assess knowledge, skills, and abilities, along with vocational interests and suitability. To accomplish this, case management staff need to adequately listen and respond appropriately to participants, providing them access to resources, tools, and skills to help them obtain and retain employment, remove or mitigate barriers, and document activities associated with these steps. Case managers not only need to be able to help their participants and achieve programmatic outcomes; a case manager needs to be able to tell the story of that participant's time in an initiative or grant.

AAWDC has developed a customer-centric model that places the participant at the center of the service delivery system. A customer-centric model is intended to ensure and document that case management staff are delivering services that:

- Prepare the participant to successfully attain employment at a family-sustaining wage through the development of a comprehensive employment plan;
- Enable the participant to identify and achieve realistic goals and facilitate job search skills through career assessment and counseling, job and interview preparation skills, and the development of appropriate job opportunities;
- Mitigate, to the extent possible, real or perceived barriers to employment using career counseling, supportive services, and appropriate training to reduce the amount of time that a participant is unemployed or underemployed; and
- Provide reasonable follow-up services to assist a participant in retaining employment.

Case Management Standards

As a company, AAWDC has established the following standards for case management.

- 1. Participation and Enrollment A customer does not become a program participant until the customer meets all the criteria for enrollment specified in the grant or by a monitoring agency. For a customer to remain a participant, case managers must meet and provide services for the customer at least monthly.
- 2. Individual Employment Plan All participants must have an Individual Employment Plan (IEP). The purpose of the IEP is to provide a guidepost of goals and objectives that case managers and participants will jointly work towards. All services provided to a participant must link back to the IEP and IEPs must be reviewed at least quarterly and changes made accordingly.
- 3. Provide Services Case management staff should document both activities and services with case notes. The rule of thumb is that all services are activities, but not all activities can be services. The distinction lies in the amount and quality of the interaction between the participant and the case manager. In general, a phone call (i.e., scheduling/confirming an appointment), e-mail, or case management activity (such as the completion of paperwork) does not qualify as a service.
- 4. Data Entry It is incumbent upon staff to ensure that case notes, services, and outcomes are entered in a timely fashion. AAWDC requires that all case notes must be completed within two business days and all other data entry must be completed in the relevant reporting system within five business days of the actual activity or service date.
- 5. Case Closure and Participant Exit Case closure and exit processes are program management issues. Program managers should design and document a procedure that allows for the proper tracking of participants and outcomes once the participant has completed a program.

Additionally, effective case management has the following characteristics:

- Services meet the participants where they are. This means that participants receive services that are tailored to their needs, abilities, skills, and interests as well as to opportunities and supports available in the local area.
- A customer-centric case management philosophy requires that case managers be active listeners who can assist participants in crucial decision-making and in meeting milestones.
- Case management staff should be specialists with a high degree of knowledge relating to occupations, job openings, training programs.
- Coordination of services with partner agencies should be easy and straight-forward for the participant. This requires that the case manager has a good working knowledge of the various agencies and programs in the local

community and how to refer participants to these programs. Wherever possible, a warm handoff should be conducted.

These standards shall inform customer flow and case management practices for all AAWDC initiatives.

Guidance on Services during Participation

Staff must only record services that have truly been provided to participants and should reflect the goals in the participant's IEP. **Staff may not add services solely to keep a participant active or delay program exit**. All services should only be open for one day, unless a valid reason exists to do otherwise. When staff leave a service open for more than one day, the staff member is indicating that the service was received continuously (i.e. every day) during the period. There are three exceptions to this rule:

- 1. Training Services Due to the nature of training, a participant can receive the service continuously without being in class every day of the week. Therefore, it is acceptable for training services to be open for multiple days. AAWDC requires that the projected begin date and projected end date of a training service match the documentation in the participant file. If the actual begin and/or end date differs from the projected dates, a case note explaining the discrepancy must be created.
- 2. Supportive Services Often linked to training, a participant is assumed to be receiving the benefit of the service even when not directly receiving it. For example, a participant who receives a gas card to assist with transportation does not only benefit on the date that he/she physically receives the card (i.e. the date the service is performed), he/she also receives a benefit during the period covered by the card. Therefore, it is appropriate to leave a supportive service open for multiple days. It is also important to note that supportive services are not standalone services. In other words, supportive services are provided in conjunction with other services. For more information, please see the Supportive Service Policy Memorandum.
- 3. Gap in Service The regulations and grant agreements governing AAWDC initiatives often allow for certain gaps in service. A gap in service is appropriate when a participant is waiting for the start of training and has no other objectives or goals in his/her IEP or when a participant has a short-term medical issue. Other allowable reasons for a gap in service may exist, depending on the initiative. A gap in service requires the permission of the Office of Research, Performance and Compliance (RPC Office) prior to the gap occurring. Approval is given for 90 days, renewable for an additional 90-day period.

AAWDC will create a case management service map for each initiative. This service map provides a list of recommended service code for case managers to use. Compliance staff will review non-standard service codes to ensure that the service is proper, necessary, and fully documented.

Enrollment in a Program

Staff shall utilize a process for enrollment into a program. Each initiative will establish a Standard Operating Procedure. The process must take into account the following:

- 1. *Program Eligibility* A participant must meet all requirements for eligibility, including providing all necessary proof of eligibility (as established by the grantor). At a minimum, AAWDC requires that a participant:
 - a. Is eligible to work in the United States;
 - b. Be a resident of Anne Arundel County (unless otherwise waived by the grantor); or
 - c. Have a bona fide job offer from an Anne Arundel County employer.
- 2. Program Suitability All participants must be assessed for suitability. In general, suitability is defined as a process of discerning a pathway of services and supports that is reasonable and appropriate for the participant, is within the scope and means of the initiative, and to which both the case manager and the participant can agree. It is imperative that staff remember that workforce funding is limited, and participation is not an entitlement.
- 3. Provision of Services A participant is not considered enrolled until staff provide an actual service to the participant. AAWDC does not define the initial service requirements, unless established by the grantor.

Exit from Program

Staff shall utilize a Case Closure process. This process will be established by a Standard Operating Procedure for each initiative. AAWDC requires that initiatives actively manage their case closure and soft exit process to ensure that participants are purposefully exited. There are three types of case closure:

- 1. Program Completion Once a participant has completed all of the goals on the IEP, it is appropriate to exit the participant. This should be considered a "successful outcome." The participant has gained employment and completed any training courses associated with their IEP. NOTE: The participant need not have gained a credential to close and exit a participant.
- 2. Accountability Exit An accountability exit occurs when a participant drops out of the program, but the initiative must still report on outcomes on the participant. Accountability exits can occur for many reasons, including:
 - The participant retires.
 - The participant drops out of the labor force to care for a family member and this care is expected to last more than 90 days.
 - The participant moves from the area (unless the move is made to take a job).
 - The participant cannot be located or has refused to continue program.
- 3. Exclusion from Reporting On occasion, something may happen with a participant that results in an extended absence from the labor force. In other words, a participant may no longer be able to search for a job. When this occurs (depending on the grantor), the initiative may be excused from collecting outcome data on the participant. This is called an Exclusion from Performance and typically occurs for the following reasons:
 - The participant is institutionalized in a jail, prison, or hospital and the period of institutionalization is expected to last more than 90 days.
 - The participant has a health issue or medical problem that precludes continued participation in the program and the medical condition is expected to last more than 90 days. (NOTE: staff may have the option to use a gap in service if the participant is uncertain about the duration of the issue.)
 - The participant dies.
 - The participant is a member of the National Guard or Armed Forces Reserve and has been called to active duty for more than 90 days.

Exclusions from performance must be case noted and approved by the RPC Office. An exclusion from performance can be granted at any point during participation or follow-up.

Individual Employment Plan (IEP)

AAWDC has adopted and refined the requirements for an IEP found in Maryland Department of Labor, Licensing and Regulation (DLLR) Policy Issuance 2014-03. The IEP is a living document that lays out an ongoing strategy between the participant and case manager. It identifies the participant's employment goals, appropriate objectives to achieve those goals, and the appropriate combination of services for those objectives. IEPs must meet the following standards:

- 1. Assessment A comprehensive assessment of the participant must be completed. Comprehensive assessment is defined as an interview, evaluation, and/or testing process that can be used to identify appropriate employment goals, potential needs and barriers, and possible training certifications.
- 2. *Employment Goal* The IEP must contain an employment goal intended to ensure that participants are being trained or receiving career services that will lead to self-sufficient wages and a high probability of success.
- 3. Needs and Barriers Any potential needs and barriers (real or perceived) must be addressed in the IEP. Needs and barriers may include, but are not limited to:
 - Assistive technology needs
 - Supportive services
 - Occupational skills gaps
 - Job search skills, job readiness skills, and job retention skills
- 4. Training Goals If training is needed for a participant, the training must be clearly identified, and the participant must be further evaluated for training services.
- 5. Participant Involvement The participant must be actively involved in the IEP process. Case managers must demonstrate that the participant was involved with the development of his/her IEP by obtaining the participant's signature on the IEP.
- 6. Regular Updates IEPs should be reviewed at least quarterly to ensure that goals and objectives continue to align with the participant's plan. Adjustments should be made as needed and documented.

AAWDC requires the use of SMART-VT goals in the IEP process. SMART goals are a management tool that allows for easier and more reliable case management of participants. SMART goals also make performance tracking and data validation easier for compliance staff.

- Specific If a goal is stated specifically, it will clarify who is to do what, when, how, where, and why (if applicable).
- Measurable A goal should be written in such a way as to help measure when the goal is reached. The criteria should be explicit.
- Attainable Goals should be reachable. Objectives can be used to break down larger goals into manageable chunks that are attainable.
- Realistic Realistic means that the goals must reflect the reality of the job market and industry. It also means that the goal can be accomplished with the available resources.
- Timely All goals must have a target date for completion. The target date should be reasonable and should take into consideration the motivation of the participant, the timeframe for any internal processes and procedures of AAWDC and any vendors, and the priority of the goal.
- *Verifiable* Goals should be able to be verified by case notes or other appropriate documentation. Verification is required for compliance and data validation purposes.
- Traceable Goals should be traceable, meaning that the goals established should track back to an assessment or other evidence available to a monitor that helps provide background and other intelligence.

Assessments

Participants are assessed at several points prior to and during program participation. These assessments are necessary to providing quality customer services and ensure that participant's services are both necessary and proper for their situation. Assessments are broken into several categories. As used in this policy, the term "assessment" refers to the process of gathering information and discerning needs. It does not refer to any assessment tool or mechanism. Case managers are expected to use their best judgement as to which tools or mechanisms may be appropriate for a participant.

- Initial Assessment This is a basic assessment of occupational abilities, interests, attitudes, job search readiness, and self-sufficiency. An initial assessment should check for basic program suitability and is often utilized at the time of referral to a program. The results of an initial assessment should be communicated through case notes or like method of communication.
- Basic Educational Skills and English Language Assessment This assessment determines the basic language and mathematical skills of participants. These assessments must follow the requirements specified in the Basic Skills Deficiency Assessment Board Directive. The results of these assessments are recorded in MWE.
- Comprehensive Assessment This is an informal assessment of the participant's job readiness, aimed at identifying an employment goal, any supportive service needs, the participant's perceived barriers to employment, and any training goals. The results of a comprehensive assessment form the body of the IEP and should be included in the participant master file.
- Training Assessment As detailed in the Occupational Training Services Policy Memorandum, a participant must be assessed for a determination of need and likelihood of success. Staff should also assess if the participant is eligible for other funding sources as detailed in the policy.
- Job Readiness Assessment Assessing participants for job readiness is a part of most assessments. AAWDC, however, will conduct a job readiness assessment at the point that a participant begins the job development phase of a program. Such an assessment looks at the participant's needs and barriers to evaluate how well those have been mitigated. A job readiness assessment may also involve re-testing of prior tools and mechanisms for improvement. The results of this assessment should be communicated through case notes or like method of communication and made part of the participant master file.

Case Notes Guidance

Case notes should document the history of interaction between staff and the participant and should document what was done, by whom, and when. Case notes serve many important functions, including:

- Documenting activity between the case manager and participant for addressing and acting towards fulfilling the participant's vocational needs;
- Serving as a record of accountability on the part of the case manager and AAWDC;

- Providing continuity of service in the event of staffing changes;
- Recording details of services provided to a participant;
- Document the participant's involvement in activities and progress;
- Capturing nuances regarding factors affecting eligibility and other information of note;
- Providing justification for service provided;
- Providing a focal point for monitoring the progress and effectiveness of service delivery; and
- Protecting the case manager and AAWDC from potential legal issues.

Case notes should be entered for all services provided to and contact with the participant. Case notes should follow the BROCRIP structure. This structure encapsulates the seven elements of good case notes. While staff should endeavor to include all seven elements, there may be situations where some elements do not apply.

- Background The initial case note should include a background statement that includes the context, setting, conditions, circumstances, and framework around which the interview was scheduled. Subsequent case notes only need a background statement if there has been a change in situation with the participant.
- Reason A statement of purpose or rationale for the meeting. Each meeting should support the IEP and the goals, objectives, and services detailed therein.
- Observations The case note should make note of factual observations as they relate to the participant during the meeting.
- Content A summary of the meeting. Should be no more than two or three sentences.
- Results A statement describing the outcome of the meeting or providing an evaluation of how well the meeting went, particularly in relation to the stated reason.
- Impressions A statement of the customer's overall progress towards their goals.
- Plans This should include the next steps. Including any assignments and who is responsible for them. You should also document when you will meet again, if appropriate.

Case Note Dos	Case Note Don'ts
DO Enter your case notes in real time. Remember: even with the best memory, we are likely to miss certain nuances and emphasize the wrong things the more time passes.	DON'T Wait 60 days to enter case notes. Every keystroke in MWE is logged, so monitors will assume that your case notes are being used to cover a gap in service or some other problem in the participant's record.
DO Summarize your meeting or contact. Case notes do not need to be War and Peace. Generally, no more than 4 to 6 sentences should be plenty to paint a picture of the participant and the meeting.	DON'T Paste e-mail threads into your case notes. Yes, it saves time for you as the case manager. However, threads don't tell a story! Only paste the relevant information from the e-mail into your case note.
DO Be consistent. Make sure that your case notes reflect the same information that is in the participant's master file.	DON'T Leave gaps in time or information. If you leave out information or have big gaps in time, you allow the monitor to draw his/her own conclusions.
DO Be factual. As Joe Friday would say, "Just the facts." Be specific and factual when writing case notes. When you are concerned about confidential information, summarize and remain focused on how this information will affect the IEP.	DON'T Be vague or give opinions. Unless you are an expert in behavioral psychology, don't say a participant is depressed, etc. Likewise, don't use generalizations with your case notes.
DO Be a problem solver. Always suggest solutions to any issues that are identified during your meetings.	DON'T Be a troublemaker. Telling a monitor that the participant isn't making progress isn't helpful and makes the monitor wonder about the quality of services.
REMEMBER This is a legal document. Your case notes may end up being read out loud in a court of law. If you don't want the world to know it, then don't put it in writing.	DON'T Use jargon. Some abbreviations are unavoidable. Keep their use to a minimum.