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Policy Number: WIOA I-B – 4.2 Updated

Effective Date: August 27, 2018

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## Case Management and Participant Files

**PURPOSE:** The purpose of this policy is to describe and to detail the regulations concerning case management and participant files, in accordance with the rules and regulations of Workforce Innovation and Opportunity Act of 2014 (WIOA), the WIOA Final Rule, Training and Employment Guidance Letters (TEGLs) published by the Employment and Training Administration of the U.S. Department of Labor (ETA), and policies of the Arkansas Workforce Development Board (AWDB).

### REFERENCE:

WIOA §§ 129(c)(3)(B) & §134(c)(2)(A)(xii)  
20 CFR 380.220(b)  
20 CFR 678.430(b)  
20 CFR 681.420(e & f)  
TEGL 19-16

### POLICY:

“Case manager” is a generic term used in this manual to indicate anyone working directly with participants. Case managers are essential front-line staff who are the core of the WIOA Title I-B programs. They welcome applicants and make them feel comfortable. They determine eligibility for programs, as well as for particular services. They evaluate the assessments, skills, interests, and aptitudes of participants to help the participants receive the services they need to obtain or retain appropriate employment. They have regular contact with participants and serve as career counselors, progress monitors, cheerleaders, and coaches. After participants exit, they identify appropriate follow-up services to help former-participants be successful in their chosen occupations.

To best serve potential participants, case managers must read and understand the policies and forms in this manual, as well as local policies, procedures, and forms. Case managers should regularly review all policies so that they are familiar with services and requirements and can, therefore, give individuals all needed services for which the participant qualifies. They are responsible for appropriately serving individuals in their local areas while being good stewards of the funds entrusted to them for service. They, more than any other WIOA employee, are responsible for helping the participants to be successful.

All forms provided in the Arkansas WIOA Title I-B Policy Manual and Forms are required to be used as appropriate, except as following:

- Forms marked “optional” in the Table of Contents. Other forms or documentation may be used for the purposes of these forms as long as all required information is included in the substitute forms or documents.

- Form WIOA I-B – 1.5 (*Common Intake and Information Form*) may be used in place of Form WIOA I-B – 1.1 (*Application – Adult & Dislocated Worker Programs*) or Form WIOA I-B – 1.2 (*Application – Youth Programs*) if desired by the local area. Form WIOA I-B – 1.5 may also be used as a common intake form for a Workforce Center if desired by Workforce Center partners.
- Forms may be modified as suggested in the form for local policies.
- Forms may be modified as allowed by ADWS for individual areas.

To avoid potential disallowed costs, each case manager should know eligibility requirements for all WIOA Title I-B programs and services. In determining eligibility, the case manager must use the eligibility determination form, as well as the priority procedure established by the local area.

In order to serve participants appropriately, the case manager must be knowledgeable about the requirements and services of Arkansas Workforce Center partners and other local entities. The eligibility requirements for particular services, as well as the needs and interests of the participant, should be kept in mind when writing the ISS or IEP and in otherwise helping participants with needed services. The case manager must use the IEP or ISS to determine and document the need for services.

Every individual who submits a WIOA application is a reportable individual. Information for every reportable individual must be entered into AJL, including all demographic information given [20 CFR 677.150; TEGL 10-16]. After an applicant has been determined eligible for a program, entering all appropriate information into AJL is part of the enrollment process. AJL is also part of the case management process. Case notes, services given by any entity, and other appropriate information should be entered as events happen or information is available. All case notes and services provided by WIOA Title I-B or any program partner must be entered into AJL.

If an eligible youth applies for a WIOA Youth program and either does not meet the enrollment requirements for that program or cannot be served by that program, the youth program provider must ensure that the youth is referred for further assessment, if necessary, or referred to appropriate programs to meet the basic skills and training needs of the applicant [WIOA § 129(c)(3)(B); 20 CFR 681.420(e & f)].

Adults should also be referred to other appropriate services, especially if they cannot be served by the WIOA Title I-B program. In addition, participants should be co-enrolled with partner programs as applicable.

Every participant must receive information concerning the following topics, as applicable, and documentation of receipt and understanding of this information must be maintained in the case file:

- Hatch Act – if participating in work-based services /activities
- Personnel Policies – if participating in work-based services/activities
- Rights, Responsibilities, and Benefits – May be specific to services/activities participating in
- Receipt of Local Grievance/Complaint Procedure. At a minimum, this must be the procedure of the local program provider or One-Stop Operator.
- Equal Opportunity information

Authorization to obtain and release information is on the last page of the application. Case managers must review this information with the participant to be sure he/she understands what has been signed.

Case notes should be made when the participant is enrolled, at least once each month while the individual is a participant, and at any time something significant happens. The case note must be more than an attempt to contact with no answer. Although the case manager should maintain contact with the participant, the note does not have to be in response to direct contact with the participant. The note could be contact with the participant, but it can also be updated information from an employer, a case manager in a partner program, a school representative, or other such individual who can update the case manager. Case notes must be entered into AJL, and they may also be placed in the participant files.

Forms and notes must be written in ink, not pencil. No white-out may be used in files. If a mistake is made, it must be crossed through once or twice, initialed, and the correction information put beside the original information. Forms must be dated when they are completed and signed. Applicants cannot be allowed to sign blank forms.

The case file (electronic or on paper) must contain a determination of need for training services as determined through the interview, evaluation, or assessment, career planning using local labor market information and training provider performance information, or other career service received. If career services are not provided before training, the case manager must document the circumstances that justified the determination to provide training without first providing career services [20 CFR 680.220(b)].

All documentation and notes concerning determination of eligibility must be kept in a participant's file, including notes concerning details of determination of eligibility and need for particular services. The case file must contain a determination of need for training services as determined through the interview, evaluation, or assessment, career planning using local labor market information and training provider performance information, or other career service received. If career services are not provided before training, the case manager must document the circumstances that justified the determination to provide training without first providing career services [20 CFR 680.220(b)].

Case notes, services, and other appropriate information must be entered into AJL. Such information may also be kept in a paper file, at the discretion of the local area. Original paper notes and documentation must be placed in a 6-tab folder in the order below. The categories of each tab are given, along with examples of what goes in that file. The name of the documents and the determination of which information is kept electronically and which is kept on paper is at the discretion of the local area, except for information required to be recorded in AJL.

- TAB 1 (Front left): Data Validation & Enrollment & Eligibility Information  
Information in tab: Data Validation Checklist on top, with other information in the number order on the checklist AND all documents collected related to enrollment for eligibility information  
Examples: Application, eligibility documentation, barrier information, low-income documentation, dislocated worker documentation
- TAB 2 (Front right): Notes, if printed  
Information in tab: Program notes, and enrollment notes in chronological order with most recent on top
- TAB 3 (Middle left): Case Management Information  
Information in tab: ISS/IEP on top, followed by assessments, testing, and other case management information in chronological order with most recent on top
- TAB 4 (Middle right): Miscellaneous Documents and AJL Printouts not in another Tab

Examples: Referral forms, Photo & Story Release Form, Exit Form, Partner Provided Form

- TAB 5 (Back Left): Training Information  
Information in tab: All training information, including occupational skills training, RA (educational component), high school, and Youth occupational training accompanying work experience  
Examples: ITA, transcripts, degree plans, financial aid information, class schedule, attendance documents, and supportive services related to training
- TAB 6 (Back right): Work Experience and Workforce Training Information  
Information in tab: All information related to work experience or workforce training, including OJT and work component of RA  
Examples: Contract for work, work permit, work evaluations, I-9, job description, time sheets, supportive services relating to work

The individual employment plan (IEP) and Individual Service Strategy (ISS) should be used to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of, and information about, eligible training providers[WIOA §134(c)(2)(A)(xii); 20 CFR 678.430(b); TEGL 19-16].

All required activities and services must be available, but the provision of individualized career services and training services must be based on the employment and service needs of the individual as determined jointly by the individual and the case manager, and should be identified through an individual employment plan (IEP) or Individual service strategy (ISS). Permitted services may also be provided if the need is demonstrated, funding is available, and the service is permitted by local policy. [TEGL 19-16; TEGL 21-16].

All 14 Program Elements must be available for Youth who need them, but not all services within each element must be available. Those services which cannot be provided by the case manager or local program provider (or would be provided better by an outside entity) may be provided by another entity. Note that training services and work experiences must be available for eligible adults and dislocated workers who demonstrate a need for such services, but the local area has the option to determine which services within the categories will be provided [20 CFR 380.220(b); TEGL 19-16]. Local WIOA Title I-B Youth program providers must work with other one-stop partners and providers of services to assist youth in obtaining the full array of needed services [WIOA §129(c)(3)(A); 20 CFR 681.420(c & d)]. DOL strongly prefers that case managers not serve as mentors, but case managers may serve as mentors in areas where adult mentors are sparse [TEGL 21-16]. Youth service providers should also work with other appropriate entities in assessing the needs of participants and creating strategies to meet those needs. Assessments and service strategies developed for the participant by other entities should be used as appropriate [WIOA § 129(c)(1)(A & B); 20 CFR 681.420(h)].