



## Case File Exit Review

Department: Office of Economic & Workforce Development

Effective Date: December 2012

Directive # 04-12

Supersedes: N04-07

### **PURPOSE**

The purpose of this bulletin is to outline the procedure for an exit review of 100% of the customer case files at time of exit determination from a WIA funded service.

### **REFERENCES**

- Training and Employment Guidance Letter (TEGL) No. 17-05
- Workforce Investment Act (WIA) Regulations 20 CFR 652 and 663.105(b)

### **BACKGROUND**

The Workforce Investment Act (WIA) program is designed as a tiered service level approach to service. There are four (4) service levels: self-directed, staff-assisted, intensive and training. WIA eligibility determination is required at the point the job seeker needs staff-assisted services to obtain and/or retain employment. As the job seeker moves through the service levels additional requirements must be met to show that the job seeker is appropriate for the next level of service to obtain and/or retain employment. The OEWD Service Providers who register customers into the WorkForceCentral system (WFC) are responsible for ensuring job seeker eligibility at the point of entry into staff-assisted services.

This responsibility for ensuring the requirements are met at the point of entry into the Intensive and/or Training service levels is documented in the customer case files maintained by the OEWD Service Provider. A procedure has been developed for the OEWD Service Provider that ensures 100% of the customer case files are reviewed for completeness upon determination of exit. The procedure includes a checklist, completed by the case manager, and signed by the site manager to verify all necessary documentation is in the case file to substantiate movement between each service level.

This procedure is necessitated to ensure compliance with the Department of Labor requirements for documentation of required program services to customers. These documentation requirements are not new. They have always been mandatory and are outlined in other tools currently in use (e.g. State Directives, State Eligibility Technical Assistance Guide) that describe the movement through the tiered service levels.

The Office of Economic and Workforce Development (OEWD) has determined that there is a need for a centralized quality control tool for 100% of the customer case files. A primary factor in this decision is that OEWD monitoring will only address a random sampling of customer case files on an annual basis and this quality control process is being instituted to prevent findings

resulting from State and/or Federal oversight which could result from the selection of customer case files not monitored by OEWD.

## **PROCEDURE**

The procedure requires case managers and site managers to review, at time of exit determination, 100% of the customer case files to ensure that documentation for participation in each of the service levels is fully documented, and then complete and sign the Checklist. The time of exit determination was chosen as the checkpoint because this is usually the last opportunity for direct contact with the customer if additional documentation needs to be obtained.

OEWD staff will be adding evidence of the completion of the Checklist for 100% of all exited customers to the Case File Review Form used in our annual monitoring visit. Additional forms, such as: “The Staff Assisted to Intensive Services Determination Form” and “The Intensive Service to Training Service Determination Form” is required to be retained in the customer case file.. .

The Checklist, the directions for completing the checklist, “The Staff Assisted to Intensive Services Determination Form”, and “The Intensive Service to Training Service Determination Form” follow.

## **COMPLETION OF DOCUMENTS**

All documents requiring signatures and dates must be complete. Any corrections made to documents must be initialed and dated. Incomplete documents and altered dates and other pertinent information can result in findings during a State or Federal monitoring review and, in some cases, the disallowance of costs. Therefore, please ensure that all documents are dated and signed on the day they are executed and that any corrections are initialed and dated.

## **INQUIRIES**

Inquiries should be addressed to the OEWD Director of Operations at 415-701-4848 or [workforce.development@sfgov.org](mailto:workforce.development@sfgov.org).

*OEWD and its service providers shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.*

**EXIT REVIEW OF CASE FILES**

Job Seeker Name \_\_\_\_\_ Last Four SSN \_\_\_\_\_

**REQUIRED FOR ALL ENROLLMENTS**

- There is a case note documenting an “active” service on the date of enrollment.
- There is a case note documenting an “active” service -- at least 1 every 90 days.
- There is a case note documenting an “active” service on the date of exit.
- Customer’s employed prior to or at f exit or employed at 1<sup>st</sup> Quarter Follow-up? Upload proof of employment in WFC and retain copy in participant’s case file.
- Customer contact information is current. Customer reminded about follow-up.

**REQUIRED FOR INTENSIVE SERVICE ENROLLMENTS**

- Intensive Services w/o training – add any intensive services activity

For participants who will be receiving training services:

- There is a comprehensive Assessment.
- There is a completed and signed Individual Employment Plan (IEP).

**REQUIRED FOR TRAINING ENROLLMENTS**

- There are training attendance and progress reports.
- There is a copy of the credential/certificate. Uploaded in WFC

Case Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

Program Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

## **DIRECTIONS FOR COMPLETING THE CHECKLIST**

Indicate Job Seeker Name and last four digits of social security number. The completed checklist is kept in the case file for monitoring review by OEWD staff and other auditors.

### **REQUIRED FOR ALL ENROLLMENTS**

The first three check boxes refer to maintaining viable case notes. In order to substantiate that the customer is actively participating in WIA funded services, in each service level, there must be case note documentation of an “active” service:

1. On the Date of Enrollment,
2. At least one (1) every ninety (90) days, at a minimum, and
3. On the Date of Exit

The following are **NOT** considered an “active” service:

- A determination of eligibility to participate in the program,
- Self-directed job search that does not result in a referral to a job,
- Services and activities specifically provided as follow-up services or regular contact with the customer or employer for purposes of obtaining information regarding his/her employment status, educational progress, need for additional services, or income support payments.

All other services are considered “active”. The case file must have a case note documenting an active service was provided: On the date of enrollment, on a regular basis, at a minimum, once every 90 days, and on the date of exit.

### **EXIT**

A customer must be exited when he or she does not receive a service funded by the program operator or a partner program for 90 consecutive calendar days and is not scheduled for future services.

At that point, you must exit the customer retroactively back to the last documented date of “active” service.

This requirement necessitates that the case manager document with case notes, regular attempts to stay in contact with the customer, setting ticklers and follow-up reminders. It also means that the program must take “negative” exits when unable to locate customers who have not received any “active” service for 90 or more days.

## **EMPLOYMENT AND FOLLOW-UP**

The last two check boxes, in this area, relate to employment and follow-up.

When a customer obtains employment, the case manager should Obtain proof of employment from participant or employer, upload document in WFC and keep copy in participant's case file.

The case manager should document with a case note that employment was obtained and a tickler is set for 1st, 2nd, and 3rd quarter(s) after exit to follow-up with supplemental data.

In order to ensure successful follow-up, the case manager should also make sure that the customer's contact information is current, and that the customer is reminded they will be called to follow-up on their progress after exit.

## **REQUIRED FOR INTENSIVE SERVICE ENROLLMENTS**

Enrollment into the Intensive Service level means that the customer requires one-on-one assistance to obtain and/or retain employment.

When the case manager updates the enrollment form enrolling the customer into one or more Intensive Service activities, the "Staff Assisted to Intensive Service Determination Form" must be retained in participant's case file.

If providing Intensive Services Only without training, then any one of the intensive services activity will be recorded in WFC.

For participants who will be receiving training services:

There must be a comprehensive Assessment of skills, aptitudes, interests and needs. The assessment should include documentation of:

- Prior work history, including lapses in employment,
- Education,
- Financial support, including salary expectations,
- Familial support, including barriers like child-care, health and transportation, and
- Occupational objectives.

There must also be an Individual Employment Plan (IEP), outlining the planned services required to meet the employment, educational, financial, familial, and occupational objectives determined through the assessment.

The IEP outlines the step-by-step process, including estimated completion dates for each step, to achieve planned goals. Both the customer and the case manager sign the IEP.

The IEP should be updated, as needed, to address new planned goals, like delivery of support services, a change in objectives, or movement into the training service level.

## **REQUIRED FOR TRAINING ENROLLMENTS**

Enrollment into the Training Service level means that the customer requires occupational skills/upgrade/on-the-job training to obtain and/or retain employment.

When the case manager updates the enrollment form enrolling the customer into a Training Service activity, the “Intensive Service to Training Service Determination Form” must be retained in participant’s case file.

In order for a customer to enter an occupational skills training provider program listed on the Eligible Training Provider List (ETPL) the customer must complete the following steps:

- Have good attendance at the Intensive Service Level
- Have explored all other funding options
- Have completed an appraisal of several schools offering the occupational training of interest
- Have completed labor market research to ensure the occupational training of interest is in a growth industry within the greater Bay Area.

Attainment of each step is documented in a case note in the case file. These case notes substantiate that the customer did follow the proper procedure for researching training providers.

On-the-Job (OJT) training skills enrollment will not necessitate the above steps because the employer defines the steps for enrollment into OJT.

Attendance and progress reports are required to substantiate that the customer is successfully progressing in the training program funded with WIA funds.

Upon successful completion of the training program, a signed credential/certificate from the training provider is in the case file. Check to ensure that the credential/certificate attainment is correctly reported on the WFC exit form.

## **SIGNATURES**

The checklist is completed by the site manager, or designee, and then signed by both the case manager and site manager

**Office of Economic and Workforce Development  
Workforce Development Division**



**Staff-Assisted to Intensive Services Determination**

Customer Name: \_\_\_\_\_ SSN: \_\_\_\_\_

- Unemployed
- Employed
  - Per hour earned income below self-sufficiency threshold

Received at least one (1) Staff-Assisted Service

- Staff-Assisted Job Development
- Staff-Assisted Job Referrals
- Staff-Assisted Job Search and Placement
- Staff-Assisted Workshops/Job Clubs
- Staff-Assisted Career Development, including strategies to address barriers
- Staff-Assisted follow-up counseling regarding the workplace
- Non-WIA funded Staff-Assisted services provided by partner agencies

Unable to obtain or retain employment that leads to self-sufficiency through Staff-Assisted Services

- Lacks marketable skills
- Unable to find job through CalJOBS
- Lack of work history
- Lack of transferable skills
- Lack of work readiness skills
- Unable to address/overcome identified barriers to employment
- Wage Variables
- Economic Conditions in the Local Workforce Investment Area
- Limited Opportunity for job sought

Requires Intensive Services to obtain or retain employment that leads to self-sufficiency

- Career Counseling and Career Planning
- Comprehensive Assessment
- Development of an Individual Employment Plan
- Structured Job Search Instruction
- Short Term Pre-vocational Services, including basic work readiness
- Case Management
- Work/Entry Employment Experience
- Non-WIA funded Intensive Services provided by partner agencies
- Other \_\_\_\_\_

Supportive Service Needs:

\_\_\_\_\_

Staff Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Referred To: \_\_\_\_\_

(Intensive Provider)

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Intensive Services to Training Services Determination

Customer Name: \_\_\_\_\_ SSN: \_\_\_\_\_

- Individual Employment Plan (IEP) completed and signed/dated by the customer**
  - Based on an objective assessment of skills, aptitudes, interests, preferences and customer choice.
  - Customer determined to be in need of training and has the skills and qualifications to successfully participate.
  - Training in a demand occupation with career growth.

Unable to obtain or retain employment that leads to self-sufficiency through intensive services

- Obsolete/Inadequate job skills
- Insufficient education for job sought
- Lack of public job orders
- Lack of transferable skills
- Lack of work readiness skills
- Wage variables
- Economic conditions in the Local Workforce Investment Area
- Industry contraction/restructure

Good attendance in at least one (1) intensive service

- Case management for participants
- Comprehensive assessment
- Development of IEP
- Individual counseling and career planning
- Short term prevocational services
- Other intensive services \_\_\_\_\_
- Non-WIA funded intensive services provided by partner agencies \_\_\_\_\_

Accomplished the following tasks prior to training enrollment

- Attend mandatory workshop(s) and orientation to career assessment (obtain signature)**
- Completed Job Search History Form**
- Financial Aid as appropriate, including Pell**
- Completed a performance appraisal of several schools
- Conducted an informational interview, job shadowing, labor market research, or incumbent interview in field of interest
- Visited school, toured the facility, and talked to current faculty and students**
- Reviewed family finances with job seeker to ensure family has assessed self-sufficiency while in training
- Other** \_\_\_\_\_

Case Manager Signature: \_\_\_\_\_ Date: \_\_\_\_\_