SECTION 19 – CASE FILE MANAGEMENT AND DOCUMENTATION STANDARDS

19.1 Purpose

This section establishes detailed procedures for participant file structure, documentation standards, case note requirements, Individual Service Strategy updates, internal file review, and corrective action processes.

The purpose of this section is to:

• Ensure all participant files are complete and audit-ready
• Align documentation with reported services and outcomes
• Maintain consistency across programs
• Protect against unsupported services or performance outcomes
• Establish internal quality control standards

These procedures apply to all programs unless stricter grant-specific requirements apply.

19.2 File Structure Requirements

Each participant file must be organized using a standardized structure, whether maintained electronically or physically.

Files shall contain the following sections in order:

1. Eligibility Documentation
2. Enrollment Documentation
3. Assessment Documentation
4. Individual Service Strategy (ISS or IDP)
5. Service Documentation
6. Supportive Services Documentation
7. Training and Work-Based Learning Documentation
8. Credential Documentation

9. Placement and Employment Documentation
10. Follow-Up Documentation
11. Correspondence and Additional Notes

Electronic files must follow standardized naming conventions to ensure easy retrieval.

19.3 Individual Service Strategy Procedures

The Individual Service Strategy must:

• Be developed after eligibility determination
• Be based on objective assessment results
• Identify career pathway goals
• Identify training pathway
• Identify supportive service needs
• Include measurable milestones

ISS must be signed and dated where required.

ISS updates must occur:

• When training changes
• When employment status changes
• When participant barriers change
• At least every 90 days for active participants

Updates must be documented in case notes.

19.4 Case Note Standards

Case notes must be:

• Entered within five (5) business days of contact or activity
• Objective and factual
• Clear and professional
• Free of subjective or discriminatory language
• Linked to participant goals

Case notes must document:

• Type of contact
• Service provided
• Barrier identified

• Action steps taken
• Follow-up required

Case notes must demonstrate active case management, not passive documentation.

19.5 Required Case Note Frequency

Minimum contact standards:

Active Participants

• At least one documented contact per month

Participants in Training

• At least one documented contact per month
• Additional documentation at training milestones

Participants in Work-Based Learning

• Monthly monitoring documentation
• Employer contact documentation

Follow-Up Participants

• Documentation consistent with Section 6 – Follow-Up Services

Supervisors may require more frequent documentation based on participant need.

19.6 Service Documentation Requirements

All reported services must be supported by documentation including:

• Attendance records
• Training enrollment verification
• Worksite agreements
• Employer monitoring forms
• Supportive service approval forms
• Payment documentation

If documentation does not exist, the service may not be reported.

Documentation standards must align with Section 14 – Data Management and Reporting Controls.

19.7 Documentation Hierarchy and Source Verification Standard

Case notes may support documentation of services and activities but may not substitute for required source documentation.

Services, credentials, measurable skill gains, placements, and supportive services payments must be supported by verifiable source documentation.

Narrative case notes alone are insufficient to support eligibility, service delivery, or performance reporting.

Where source documentation is required, it must be retained in the participant file and aligned with reported data.

19.8 Credential Documentation Standards

For credentials to be reported:

- Copy of certificate must be in file; or
- Official transcript; or
- Licensing verification

Credential documentation must clearly show:

- Participant name
- Credential title
- Date awarded

Unofficial or unverifiable credentials may not be reported.

19.9 Placement Documentation Standards

Employment verification must include:

Primary Source

- State wage record data

Secondary Sources (when allowed)

- Pay stub
- Employer verification
- Offer letter
- Apprenticeship documentation

Documentation must confirm:

• Employer name
• Employment start date
• Wage rate

Self-attestation may only be used where permitted and must include written justification.

19.10 Electronic File Standards

Electronic files must:

• Be stored in secure systems
• Be protected by role-based access
• Use standardized file naming conventions
• Be backed up appropriately

Files must remain accessible for monitoring and audit.

Electronic file management must comply with Section 9 – Privacy and Records Protection.

19.11 Internal File Review Procedure

Supervisory staff shall conduct file reviews:

• Quarterly for active caseloads
• Prior to participant exit
• Prior to major outcome reporting

File review must confirm:

• Eligibility documentation complete
• ISS current
• Case notes timely
• Services supported
• Credentials documented
• Placement verified

Findings must be documented.

Monitoring activities align with Section 12 – Internal Monitoring and Quality Assurance.

19.12 Corrective Action Procedure

If deficiencies are identified:

1. Supervisor documents finding.

2. Case manager is notified in writing.
3. Correction must occur within ten (10) business days.
4. Follow-up review confirms correction.

Repeated deficiencies may result in retraining or disciplinary action.

19.13 Audit Preparation and Readiness

Files must be maintained in a condition that allows:

• Immediate retrieval
• Clear documentation flow
• Logical organization
• Direct support of reported data

Staff shall treat all participant files as audit-ready at all times.

19.14 Record Retention Alignment

Participant files must be retained consistent with:

• 2 CFR §200.334
• Virginia Works requirements
• Grant-specific requirements

Retention periods begin after grant closeout unless otherwise specified.