

SECTION 3 – CASE MANAGEMENT AND INDIVIDUAL SERVICE STRATEGY FRAMEWORK

3.1 Purpose

This section establishes uniform standards for case management, participant file documentation, Individual Service Strategy and Individual Employment Plan development, service tracking, and internal quality assurance across all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

- Ensure services are properly documented
- Support performance outcomes with verifiable documentation
- Maintain audit-ready participant files
- Align service delivery with participant goals
- Protect against unsupported costs and performance disallowance

All case management activities must comply with applicable federal regulations, Virginia Works guidance, and internal control requirements.

3.2 Case Management Philosophy

Case management within the local workforce development area shall be:

- Participant-centered
- Goal-oriented
- Data-informed
- Barrier-responsive
- Documented in real time
- Aligned with career pathway development

Case management must demonstrate active engagement and meaningful service coordination, not passive documentation.

3.3 Participant File Requirements

A participant file shall be established for each enrolled individual.

Files may be maintained electronically, physically, or in hybrid format, provided that:

- Documentation is complete and organized
- Access is secure and limited to authorized staff
- Records are retrievable for monitoring and audit
- Documentation supports all reported data and performance outcomes

3.4 Required File Components

At minimum, each participant file must contain the following components:

A. Eligibility Documentation

All documents required under Section 2 – Eligibility, Priority, and Enrollment Framework.

B. Enrollment Documentation

- Signed enrollment forms
- Enrollment date confirmation
- Reporting system entry confirmation

C. Assessment Documentation

- Objective assessment results
- Basic skills assessments (if applicable)
- Career interest assessments
- Barrier identification

D. Individual Employment Plan (IEP) or Individual Service Strategy (ISS)

E. Service Documentation

- Training attendance
- Work-based learning documentation
- Supportive service documentation
- Incentive documentation (if applicable)

F. Case Notes

- Documentation of participant contact
- Barrier identification and resolution
- Progress toward goals
- Service coordination activities

G. Credential Documentation

- Copies of certificates
- Official transcripts
- Licensing verification

H. Placement Documentation

- Employment verification
- Education enrollment verification
- Apprenticeship documentation
- Military documentation (if applicable)

I. Follow-Up Documentation

- Follow-up contact records
- Retention verification
- Wage documentation (if applicable)

Participant files must remain complete, organized, and audit-ready at all times.

3.5 Individual Employment Plan (IEP) and Individual Service Strategy (ISS)

An Individual Employment Plan (IEP) for Adults and Dislocated Workers or an Individual Service Strategy (ISS) for Youth shall be developed after enrollment and based on objective assessment results.

The IEP/ISS must:

- Identify career goals
- Identify educational goals
- Identify an occupational training pathway where appropriate
- Identify supportive service needs
- Establish measurable milestones
- Be aligned with labor market demand

All services authorized for the participant must align with the goals and activities identified in the IEP or ISS.

The IEP or ISS must be reviewed and updated periodically to reflect participant progress and changing circumstances.

Updates must be documented in case notes.

3.6 Case Note Standards

Case notes must:

- Be entered in a timely manner following participant interaction
- Be factual and objective
- Reflect meaningful interaction or service coordination
- Document services provided
- Document barriers and steps taken to address those barriers
- Support reported performance outcomes

Case notes must demonstrate active case management, not merely data entry.

Case notes must never contain subjective, inappropriate, or discriminatory language.

3.7 Documentation of Services

All services reported in official reporting systems must be supported by documentation in the participant file.

Examples of acceptable documentation include:

- Attendance sheets
- Instructor verification
- Signed training agreements
- Worksite agreements
- Supportive service approvals
- Payment authorizations

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

3.8 Work-Based Learning Documentation

For programs involving work experience, on-the-job training, or apprenticeship activities, participant files must include:

- Worksite agreement
- Training plan or training outline
- Employer contact information
- Supervisor verification
- Attendance documentation
- Participant progress evaluations
- Case notes documenting employer contact and monitoring

Worksite monitoring must occur at reasonable intervals and must be documented in the participant file.

3.9 Data Entry Alignment

All data entered into the official reporting system must:

- Match participant file documentation
- Reflect accurate service dates
- Reflect accurate service types
- Reflect accurate outcomes

Discrepancies between documentation and system entries must be corrected promptly.

3.10 Quality Assurance and Internal Review

Supervisory staff shall conduct periodic file reviews to ensure:

- Eligibility documentation is complete
- IEP or ISS is developed and updated
- Case notes are current
- Services are supported by documentation
- Credentials are verified
- Placement documentation is sufficient

File review findings must be documented and corrective action implemented where deficiencies are identified.

3.11 Confidentiality and Protection of Information

Participant files contain personally identifiable information and must be protected in accordance with applicable confidentiality requirements and the organization's Protection of Personal Identifiable Information policy.

Access shall be limited to authorized personnel.

Electronic systems must utilize role-based access controls.

3.12 Record Retention

Participant files shall be retained in accordance with:

- 2 CFR §200.334
- Virginia Works guidance
- Grant-specific retention requirements

Records must remain accessible for monitoring, audit, or investigation throughout the retention period.

3.13 Conflict of Interest Safeguards

Staff responsible for eligibility determination, supportive service approval, incentive authorization, or performance reporting must comply with applicable conflict-of-interest policies.

No staff member may approve services that present a personal or financial conflict of interest.

3.14 Monitoring and Enforcement

Failure to maintain proper documentation may result in:

- Disallowed costs
- Performance disallowance
- Corrective action
- Staff retraining
- Increased monitoring

Repeated documentation deficiencies may result in suspension of enrollment authority.