



**WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)
POLICY NOTICE NO. 26 Rev. 2**

EFFECTIVE DATE: March 31, 2026

SUBJECT: CASE MANAGEMENT

I. PURPOSE

The purpose of this policy is to ensure consistent, compliant, participant-centered service delivery; accurate documentation; performance accountability; and alignment with federal, state, and local workforce requirements.

II. AUTHORITY

This policy is issued pursuant to:

- Workforce Innovation and Opportunity Act (WIOA) §§ 129 and 134
- WIOA §116 (Performance Accountability)
- 20 CFR Parts 680 and 681 (Adult, Dislocated Worker, and Youth Programs)
- 20 CFR Part 677 (Performance Reporting and Exit)
- 20 CFR §683.285 (Confidentiality and Record Retention)
- 29 CFR Part 38 (Equal Opportunity and Nondiscrimination)
- 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements)
- Applicable guidance issued by the U.S. Department of Labor and the New Mexico Department of Workforce Solutions
- NALWDB Policy No. 30 – Electronic File Policy
- NALWDB Monitoring Policy

III. POLICY STATEMENT

Case management under WIOA Title I shall be delivered through a structured, individualized, and participant-centered approach that ensures services are responsive to each participant's assessed needs, barriers, and employment goals. Case management must be continuous throughout program participation and include assessment, service planning, coordination of services, documentation, and follow-up to support successful outcomes.

Case management activities shall include, but are not limited to, the following:

- Assess skill levels and service needs.
- Develop employment and education goals.



- Coordinate appropriate services and training.
- Monitor participant progress.
- Document outcomes; and
- Support successful completion of career pathway objectives.

All case management activities must be documented accurately and timely in the state-approved case management system (NM JOBS) and supports eligibility, service delivery, and program outcomes. Documentation shall be entered within established timeframes, including case notes within five (5) business days of activity and required documentation uploaded within two (2) business days of enrollment, execution, or service delivery, in accordance with NALWDB Electronic File and Monitoring Policies.

IV. CASE MANAGEMENT REQUIREMENTS – ADULT AND DISLOCATED WORKER

For Adult and Dislocated Worker participants, case management shall include:

1. Comprehensive and specialized assessments of skill levels and service needs, including:
 - Diagnostic testing and other valid assessment tools.
 - In-depth interviewing to identify employment barriers.
2. Development of an Individual Employment Plan (IEP) that:
 - Identify employment goals;
 - Documents selected services and training.
 - Establishes measurable objectives and timelines;
 - Is reviewed and updated as necessary.
3. Career counseling and labor market information services, including:
 - Local and regional labor market trends;
 - In-demand occupations and wage information;
 - Skills and credential requirements.
4. Determination of training appropriateness and funding allowability consistent with WIOA and 2 CFR Part 200.
5. Ongoing monitoring of service participation and progress toward goals.
6. Documentation of services, case notes, progress, and outcomes in the electronic case management system.

IV.A. Case Management Procedures and Implementation

Case management activities shall be carried out in accordance with established procedures and documentation standards adopted by the Northern Area Local Workforce Development Board



(NALWDB). These procedures are outlined in the Data Timeliness and Integrity Standard Operating Procedure (SOP) and supporting guidance documents. The SOP provides detailed instruction on:

- Required documentation and data entry standards in NMJOBS
- Timelines for entry of case notes, eligibility documentation, services, and outcomes
- Development and maintenance of Individual Employment Plans (IEPs) and Individual Service Strategies (ISSs)
- Documentation and verification of services, including training, supportive services, measurable skills gains, and credentials
- Quality assurance review processes, including weekly tracking, monthly file reviews, and quarterly reconciliation

IV.B. Training and Technical Assistance

NALWDB ensures that all case managers and program staff are trained in case management procedures and documentation requirements. Training and technical assistance include:

- Ongoing training on WIOA regulations, NMDWS guidance, and local policies
- Instruction on SOP requirements, including documentation timelines and data entry standards
- Targeted technical assistance based on monitoring results, QA reviews, and identified compliance risks
- Periodic refresher training to ensure consistency and continuous improvement
- The QA Specialist and Program Managers are responsible for providing guidance, monitoring compliance, and ensuring consistent implementation of case management procedures.

V. CASE MANAGEMENT REQUIREMENTS – YOUTH

Case management for Youth participants shall be consistent with WIOA §129 and including requirements for objective assessment (20 CFR §681.410), development of an Individual Service Strategy (20 CFR §681.420), and delivery of program elements (20 CFR §681.460).

Case management under WIOA Youth programs is the process through which these required activities are implemented and must include:

1. Objective assessment of academic and occupational skill levels
2. Development of an Individual Service Strategy (ISS) 20 CFR §681.420 that:
 - Identifies education and employment goals.
 - Incorporates appropriate program elements.



- Establishes measurable progress indicators.
- Is reviewed and updated regularly, at least once every ninety (90) days, and more frequently as needed to reflect changes in participant progress, service needs, or program activities.

- Assessment and documentation of supportive service needs necessary to support participation in program activities
- Coordination of education, training, mentoring, and supportive services to ensure alignment with the participant's Individual Service Strategy (ISS)
- Documentation of Measurable Skill Gains (MSG) during participation, as applicable, in accordance with WIOA performance requirements
- Co-enrollment in other programs and services, when appropriate and allowable, to enhance participant outcomes and access to resources

VI. DOCUMENTATION AND ELECTRONIC RECORDS

All case management activities must be documented in the state-approved electronic case management system in accordance with the NALWDB Electronic File Policy.

Documentation requirements include:

- Eligibility determinations.
- Assessments and plans (IEP/ISS).
- Service delivery and case notes.
- Supportive services.
- Training progress.
- Measurable Skill Gains.
- Credential attainment.
- Follow-up services.
- Exit documentation.
- Must be uploaded to NM Jobs within 2 business days of enrollment, execution or service activity.

Case notes must:

- Support the provision of services.
- Explain decision-making rationale.
- Reflect significant changes or issues.
- Be entered within 5 days of participant contact or service activity, as defined by the Electronic File and Monitoring Policies



The electronic file shall serve as the official file of record. All documentation must be maintained in accordance with 20 CFR §683.285 and 2 CFR §200.334 and 29 CFR Part 38, ensuring the confidentiality of personally identifiable information (PII) and compliance with all applicable nondiscrimination and equal opportunity requirements.

VII. SERVICE DELIVERY AND ENGAGEMENT

Case managers must maintain ongoing contact with participants to support service delivery and progress toward goals. At a minimum, case managers must have documented contact with participants at least once every thirty (30) days, unless a higher level of contact is required based on participant need. The type and intensity of contact shall be determined by the case manager based on the participant's objective assessment and Individual Employment Plan (IEP) or Individual Service Strategy (ISS), in accordance with 20 CFR §§680.340 and 681.420.

This requirement is established as a local standard to ensure effective service delivery, program oversight, and internal controls consistent with 20 CFR §683.410 and 2 CFR §200.303.

contact must be sufficient to:

- Monitor participation.
- Identify barriers.
- Provide necessary interventions.
- Ensure continued progress toward goals.

Self-service and information-only activities do not constitute reportable services for purposes of preventing exit.

VIII. MEASURABLE SKILL GAINS (MSG)

Case managers must document Measurable Skill Gains (MSG) during participation, as defined under WIOA §116(b)(2)(A)(i)(V) and 20 CFR §677.155(a)(1)(v), and ensure that supporting documentation is maintained in NMJOBS in accordance with data validation and reporting requirements.

MSG documentation must include:

- Type of gain achieved.
- Date achieved.
- Supporting documentation.
- Case note explanation.

Failure to properly document MSG may negatively impact performance outcomes.



IX. PROGRAM EXIT

A participant shall be considered exited from the program when:

- No WIOA-funded or partner services have been provided for 90 consecutive days.
- No future services are scheduled; and
- The participant is not in a planned gap in service, consistent with 20 CFR §677.150(c).

Follow-up services do not prevent exit.

Exit determinations must be supported by case documentation reflecting the last date of service and rationale for closure.

Soft Exit:

A soft exit occurs when a participant has not received any services for 90 consecutive days, has no future services scheduled, and is not in a planned gap in service. In these cases, the participant is automatically exited by the case management system based on inactivity.

Hard Exit:

A hard exit occurs when a case manager determines that a participant will no longer receive services and formally closes the participant's record in NMJOBS prior to the 90-day period, or at the point the participant has completed or withdrawn from the program. Hard exits must be supported by case documentation clearly indicating the reason for closure and the participant's final service status.

Exit determinations must be supported by case documentation reflecting the last date of service and rationale for closure.

X. FOLLOW-UP SERVICES

Follow-up services **must** be provided for a minimum of twelve (12) months after exit for Youth, Adult, and Dislocated Worker participants, in accordance with WIOA §129(c)(2)(I) (Youth) and WIOA §134(c)(2)(A)(xiii) (Adult and Dislocated Worker), and implementing regulations at 20 CFR §§681.580(c) and 680.150(c).

Follow-up services are intended to support retention in employment or education and may be provided beyond twelve (12) months based on participant need.

If a participant returns within ninety (90) days of exit and receives additional services (other than follow-up), the participant will not be considered exited, and the follow-up period will not begin until a new exit occurs.



Youth Follow-Up Services

Follow-up services for Youth participants may include, but are not limited to, the following in accordance with 20 CFR §681.580:

- Leadership development and supportive service referrals
- Adult mentoring
- Counseling and guidance
- Financial literacy education
- Services that provide labor market and employment information
- Activities that help youth prepare for and transition to postsecondary education and training
- Supportive services, as necessary, to support retention in employment or education
- Employment retention support and progress verification

Adult and Dislocated Worker Follow-Up Services

Follow-up services for Adult and Dislocated Worker participants may include, but are not limited to:

- Counseling and career guidance
- Supportive service referrals or limited supportive services, as appropriate
- Employment retention support
- Assistance with job advancement or skill development
- Progress verification and continued engagement with the participant

Follow-up documentation must be maintained in the electronic case management system.

XI. PERFORMANCE ACCOUNTABILITY

Case management practices directly impact the WIOA Primary Indicators of Performance under WIOA §116 and 20 CFR Part 677. Accurate documentation, timely data entry, and alignment between case notes and supporting documentation are essential to ensure valid performance reporting and successful data validation.

A. Primary Indicators of Performance

The WIOA Title I Primary Indicators of Performance include:

- Employment in the 2nd Quarter After Exit
- Employment in the 4th Quarter After Exit
- Median Earnings in the 2nd Quarter After Exit
- Credential Attainment
- Measurable Skill Gains (MSG)
- Effectiveness in Serving Employers (as applicable)



B. Performance Lag – What Lags and What Does Not

Certain performance indicators are time-lagged due to federal measurement requirements.

1. Indicators That Lag

The following indicators are measured after program exit and therefore reflect prior exit cohorts:

- Employment in the 2nd Quarter After Exit
- Employment in the 4th Quarter After Exit
- Median Earnings in the 2nd Quarter After Exit
- Credential Attainment (measured within one year after exit)

These indicators do not reflect current participants. Instead, they measure outcomes for participants who exited in prior quarters.

Case managers must understand that:

- Exit date accuracy directly impacts which reporting cohort a participant falls into.
- Failure to properly close services or document planned gaps may delay or misalign exit.
- Late data entry may affect performance calculations.

Accurate and timely documentation, including case notes, service entries, and supporting documentation, is critical for both active and exited participants to ensure correct performance reporting, financial accountability, and proper payment of services.

2. Indicators That Do Not Lag

The following indicator is measured during participation and does not lag:

- Measurable Skill Gains (MSG)

MSG must be documented during the participant's period of participation and before exit.

Failure to document an MSG during participation results in a negative impact to performance.

C. Credential Attainment – Documentation Requirements

Credential Attainment is measured for participants who:

- Exit from training; and
- Earn a recognized postsecondary credential or high school diploma/equivalent during participation or within one (1) year after exit.

For a credential to be counted, the electronic file must include:

1. A copy of the credential (certificate, diploma, license, transcript, or official verification).



2. The date the credential was earned.
3. A case note documenting:
 - Type of credential earned.
 - Date earned.
 - Training program associated with the credential.
 - Source of verification.

For secondary school diplomas or equivalency credentials, documentation must also support that the participant was either:

- Employed; or
- Enrolled in postsecondary education or training within one year after exit.

Credential documentation must be uploaded to the electronic file and clearly labeled in accordance with the Electronic File Policy.

Case notes alone are insufficient without supporting documentation.

D. Case Note Standards and Specificity

Case notes must be:

- **Timely** – Case notes must be entered into NMJOBS within five (5) business days of the participant contact or service activity, in accordance with the NALWDB Monitoring Policy.
- **Accurate** – Case notes must be complete, consistent with supporting documentation, and reflect actual participant contact, services provided, and outcomes, in accordance with NALWDB Electronic File Policy and internal control requirements under 2 CFR §200.303.
- **Specific** – Case notes must clearly describe the service provided, the purpose of the interaction, participant progress, and how the activity aligns with the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS), while avoiding unnecessary personally identifiable information (PII) in accordance with 29 CFR Part 38.

Case note standards shall be enforced through ongoing monitoring, quality assurance reviews, and technical assistance.

Case notes must clearly:

1. Describe the service provided.
2. Explain the purpose of the service.
3. Connect the service to the participant's IEP or ISS goal.
4. Document participant progress or barriers.



5. Identify next steps.

Vague case notes such as “participant doing well” or “checked in with client” are insufficient. Case notes must provide enough detail to allow a monitor or auditor to understand:

- Why was the service provided.
- How it supports the participant’s employment or education goal.
- Whether progress is being made.
- Whether continued services are justified.

E. Alignment Between Case Notes and Electronic Documentation

Case notes must align with supporting documentation in the electronic file. Specifically:

- Services recorded in the case management system must match uploaded documentation.
- Training start and end dates must align with attendance records.
- Supportive service case notes must correspond to receipts or verification documents.
- Credential case notes must align with uploaded proof of attainment.
- MSG case notes must correspond to documented evidence of progress.

Inconsistencies between case notes and electronic documentation may result in disallowed costs, data validation errors, or negative monitoring findings.

The NMJOBS electronic file system, maintained by the New Mexico Department of Workforce Solutions (NMDWS), shall serve as the official file of record for all WIOA Title I participant documentation. Any secondary or local electronic storage systems utilized by the Northern Area Local Workforce Development Board (NALWDB), such as shared drives or document management systems, are considered supplemental and do not replace the requirement to maintain complete and accurate participant records in NMJOBS. All required eligibility, service, and outcome documentation must be uploaded and maintained in NMJOBS in accordance with NMDWS Policy #24-005.

F. Data Integrity and Exit Impact

Improper documentation may:

- Negatively impact MSG rates;
- Delay or invalidate Credential Attainment;
- Misalign exit cohorts for employment measures;



- Create data validation findings;
- Result in monitoring corrective action.

Case managers are responsible for ensuring:

- Accurate and timely service entry.
- Proper closure of services.
- Documentation of planned gaps, when applicable.
- Clear documentation supporting exit rationale.

G. Monitoring and Continuous Improvement

Performance data is reviewed quarterly. When performance deficiencies are identified, service providers may be required to:

- Conduct internal file reviews.
- Submit corrective action plans.
- Participate in targeted technical assistance.
- Implement documentation improvements.

Case management quality directly affects local area performance outcomes and funding stability.

XII. EQUAL OPPORTUNITY AND NONDISCRIMINATION

All case management activities shall comply with WIOA Section 188 and 29 CFR Part 38.

Discrimination is prohibited based on race, color, religion, sex, national origin, age, disability, political affiliation or belief, or participation in a WIOA Title I-funded program.

Reasonable accommodations shall be provided to qualified individuals with disabilities. Personally identifiable information (PII) must be protected in accordance with applicable confidentiality requirements.

XIII. MONITORING AND COMPLIANCE

Case management activities are subject to review through NALWDB monitoring, state oversight, and federal audits.

Failure to maintain adequate documentation or comply with case management standards may result in corrective action consistent with contract and monitoring policies.


XIV. EFFECTIVE DATE AND REVIEW

This policy supersedes all prior NALWDB Case Management policies and is effective upon approval.



This policy shall be reviewed annually and updated as necessary to ensure compliance with federal and state law and guidance.

This policy rescinds any previous NALWDB policy regarding subject.
INQUIRIES; Contact WIOA Program Manager at (505) 986-0363.



Joseph Weathers (Apr 7, 2026 22:15:49 MDT)
NALWDB CHAIR

Apr 7, 2026

DATE