

February 9, 2003

DIRECTIVE: JOB CORPS PROGRAM INSTRUCTION NO. 03-15

TO: ALL JOB CORPS NATIONAL OFFICE SENIOR STAFF
ALL JOB CORPS REGIONAL DIRECTORS
ALL JOB CORPS CENTER DIRECTORS
ALL JOB CORPS CENTER OPERATORS
ALL NATIONAL TRAINING AND SUPPORT CONTRACTORS
ALL OUTREACH, ADMISSIONS AND CTS CONTRACTORS

FROM: RICHARD C. TRIGG
National Director
Office of Job Corps

SUBJECT: Guidance on Electronic Case Note Content in the CDSS Suite of Applications

1. Purpose. To provide guidance on appropriate content for the electronic Case Notes function in the CDSS suite of applications to ensure confidentiality of sensitive student information, and the center operators' responsibility.
2. Background. Comprehensive record keeping is a key element in guiding the career development process for students. Effective documentation ensures the continuity of care for Job Corps students by facilitating ongoing communication about a student's status, as well as communication among staff. The Job Corps Policy Requirements Handbook (PRH) outlines specific expectations for recording pertinent information, much of which can be recorded using the electronic Case Notes function. The electronic Case Notes function adds a new dimension to the record keeping system because of the significant increase in the number of staff with direct access to information recorded about students.

Prior to the CDSS Suite of Applications, Case Notes were maintained in hard copy and available only to select personnel. The new electronic Case Notes application allows staff to access and view notes posted to a student's record throughout the system, from Outreach and Admissions through the Career Transition Phase. Regional and center management determine which staff have access to electronic Case Notes. Generally, outreach and admissions counselors, instructors, counselors, residential advisors, health and wellness staff, career transition specialists, as well as all administrative staff, have access to students' electronic Case Notes. Since Case Notes are now available to a greater number of individuals within the Job Corps program, it is imperative that privacy and confidentiality issues be addressed.

3. Guidelines. Electronic Case Notes must only include information that is relevant and necessary for Job Corps to provide career training and other related services to students. Details of a student's intimate life, political, religious, or other personal views, must never be entered into electronic Case Notes. Any private information that is deemed relevant for a student's record, but not appropriate for all staff with access to electronic Case Notes to know, must be written in hard copy only, and maintained in the student's paper file, such as a Counseling or Health and Wellness file.

Additionally, staff must never leave electronic Case Notes open on an unattended computer, or printouts of electronic Case Notes on desks or in open spaces where students or other unauthorized individuals might attain access to them.

Contractors and subcontractors are urged to consult legal counsel in establishing systems and procedures for compliance with the Privacy Act of 1974. However, at a minimum, staff must be aware that the electronic Case Notes application must *not* be used for recording confidential information.

Resources for documenting and managing case notes can be found at:

- The Administration for Children and Families Guide for Caseworkers
<http://nccanch.acf.hhs.gov/pubs/usermanuals/cps/chaptwelve.cfm>
- Basic Standards for Clinical Documentation and Recordkeeping
http://www.clinicalsw.org/basic_standards.html
- Write Enough: Effective Recording in Children's Services
<http://www.writeenough.org.uk/introduction.htm>
- The National Association of Social Workers
www.socialworkers.org
- The Privacy Act
<http://www.usdoj.gov/04foia/privstat.htm>

4. Action. Operators should review a sampling of current electronic Case Notes on their center(s), and must take appropriate steps to ensure that the content entered is appropriate. All staff who utilize the electronic Case Notes function in the CDSS Suite of Applications must receive a copy of this Instruction and fully understand their operator's appropriate content guidelines.

5. Expiration Date. Until superseded.

6. Inquiries. Inquiries should be addressed to Tessa Hale at 202-693-3878, or email to hale.tessa@dol.gov.