

Operational Policy

Policy title:	Official paper case service record and ORCA documentation of case notes and email communication clarification		
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Approved:	Howard Fulk, Policy and Training Manager		

Purpose

This Policy Transmittal (PT) clarifies Vocational Rehabilitation (VR) policy and procedures surrounding incorporating email correspondence into the client’s official paper copy file (or case service record) and the ORCA case management system.

Description

The client’s official paper copy file (or case service record) and the ORCA case management system contain similar information. However, documentation requirements standards for the two entities are different.

Much of our work is commonly completed via electronic communication. As a reminder, email correspondence between Vocational Rehabilitation and our clients is considered a form of official communication. This communication should be carefully drafted and refined just as you would any other official correspondence.

Applicability

This policy applies to all Vocational Rehabilitation staff including employees, volunteers, trainees and interns.

Policy

1. ORCA’s purpose and function:

ORCA is the electronic case management system used by Oregon VR.

The primary functions of ORCA are to:

- Serve as an electronic case management system that collects data,
- Automate data collection to be used for program management, and,
- To meet federal reporting requirements under the Workforce Investment & Opportunity Act (WIOA) and by the Rehabilitation Services Agency (RSA).

The Rehabilitation Services Administration states, “*An electronic case management system is merely a data entry process that is susceptible to data entry errors*” ([RSA-PD-19-03](#)).

- ORCA does not satisfy the requirements necessary to be a permanent record keeping system.
 - Data entered into ORCA may be altered, edited or amended by the user and thus does not qualify as an official record.

2. The Paper file is Always the Official Record of Services

The paper copy of the client’s file is the VR official record of services ([RSA-PD-19-03](#)).

Hard copy or printed documentation is used to verify that data in ORCA is accurate, complete and supported.

- Copying and pasting an email message into the client’s ORCA file does not relieve the counselor of the requirement to print and save the correspondence in the paper file.
- Email correspondence related to a client’s case must be printed in their entirety to include the date and the names of recipients.
 - Printed emails may not be altered or edited and must include a complete record of the discussion to include email conversation “chains”.
 - Attaching an email conversation as a .pdf to an ORCA a case file is not recommended.
 - When printing the ORCA case file to archive it, attached files do not automatically print and may be missed.
- At a minimum, VRCs must assure that all programmatic decisions, actions, discussions, work in progress, and services are documented as provided in [34 CFR §361.47 Record of services](#).

Procedures

ORCA: Summarize Information from Email Correspondence

It is best practice to summarize information from an email conversation with a client in an electronic case note in ORCA.

- This avoids errors in altering the meaning of an email when copying or cutting and pasting an email message.
- Cutting and pasting a portion of a conversation may remove the context of the discussion or alter its intent.

The case note about the email must contain:

- The sender's information
- Date and time of correspondence
- Everyone who was sent the message
- A concise summary of the conversation

Dated and time-stamped email correspondence in its entirety should rarely be transferred directly into an ORCA case note unless:

- After carefully reviewing the entire conversation you ensure that it addresses a specific situation, topic or decision, and,
- You believe the best way to capture the discussion or decision is to directly transcribe the exchange. Some reasons that might be appropriate are:
 - The message may deal with a complex issue with many pertinent details to be discussed and negotiated.
 - The complex issue is best explained through the inclusion of the entire message.
 - The message demonstrates a decision ([34 CFR §361.47 Record of services](#) (11))
 - The email conversation was contentious and needs to be included as a reference.

Similarities between ORCA and the official paper copy files:

- Any information provided in a case note should be considered a legal and potentially public document.
 - Information that is held in these files may be reviewed as part of any audit or review process.
- Additionally, case notes serve to document the ongoing interactions and service process between VR and the client. Therefore, case notes may be included in a dispute resolution procedure.

Privacy and Security issues

Data privacy and security must be maintained when documenting email communication in the official paper copy and the ORCA case notes.

- Double check to assure that only information about the applicant or participant is documented in that person's official print file or the ORCA file.

- Assure that any information from email entered into the official paper copy and the ORCA case notes only concerns the applicant or participant.

Minimum necessary (DHS policy)

From [DHS-100-004](#):

- When using, disclosing or requesting personal identifying information (PII), staff must use, disclose or request only the smallest amount of information needed to accomplish the goal of the request (minimum necessary standard) and only to the extent provided in federal and state statutes and rules, and agency policies.
- The minimum necessary standard does not apply to:
 - Disclosures made to the individual about the individual.
 - Uses or disclosures authorized by the individual that are within the scope of the authorization.
 - Uses or disclosures that are required by law.

Definitions

Case notes mean a brief analysis of a case, identifying, examining, and clarifying key elements of a decision. Case notes identify details and reason for action or proposed action.

Case Service Record means the case service record documents the application for and provision of vocational rehabilitation and supported employment services to individuals with disabilities, including program outcomes. (Source: [OAR 582 Division 1 Definitions \(12\)](#))

- An individual may have multiple service records resulting from repeated involvement with the vocational rehabilitation and supported employment programs.
- This is the hard or paper copy of the record. It is the official record for service.

References

[34 CFR §361.47 Record of Services](#)

[RSA-PD-19-03](#)

[OAR 582 Division 1 Definitions](#)

[DHS-100-004 Minimum Necessary Standard for Releasing Personally Identifiable Information \(03/06/2017\)](#)

[Policy 6.9 Use of Email/Electronic Communication](#)

Forms referenced

Not applicable

Related policies

See References (above)

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Keywords

Case notes; case service records; ORCA; paper file; documentation; cut and paste; case management system

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