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To: Workforce Development Board Directors
Job Service Directors
Job Service Supervisors
ASSET User Group Representatives

From: Chytania Brown, Section Chief
Local Services Section

A handwritten signature in black ink, appearing to be "CB", written over the name Chytania Brown.

Subject: **Workforce Investment Act Policy Update 07-04, Change 1: Automated System Support for Employment and Training Correction Requests**

Purpose

This policy is being updated to address changes in the Automated System Support for Employment and Training (ASSET) processing of ASSET staff requests. This policy update affects Workforce Investment Act (WIA) Title 1, Trade Adjustment Assistance (TAA), WIA Title 3 Veterans and WIA Title 3 Wagner Peyser data change requests.

Legislative/Regulatory References

- WIA of 1998, Section 185. Reports; Recordkeeping; Investigations
- United States Department of Labor (US DOL) Training and Employment Guidance Letter (TEGL) 17-05: Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues
- WIA Policy Update 06-03: Definition of Participant and Exiter for US DOL Employment and Training Programs

Background

The Workforce Investment Act (WIA) states that "Recipients of funds under this title shall keep records that are sufficient to permit the preparation of reports required by this title... such recipients shall maintain standardized records for all individual participants..." The Act requires that "Each State shall prescribe and maintain comparable management information systems, in accordance with guidelines that shall be prescribed by the Secretary, designed to facilitate the uniform compilation, cross tabulation and analysis of programmatic, participant and financial data on statewide, local area, and other appropriate bases, necessary for reporting, monitoring and evaluating purposes..."

ASSET is the system used for the above-stated purposes. Case managers, Workforce Development Board (WDB) program management staff and designated State staff are given access to ASSET for the purpose of reporting and monitoring participant activities and outcomes. The level of access to edit, change and remove records is set in accordance with Division of Employment and Training

(DET) security systems policy and documented need. Either the participant (through JobCenterofWisconsin.com) or case managers enter initial participant data into the system. Case managers are expected to review and monitor their data entry prior to saving the records to minimize the need for changes and edits resulting from inaccurate data entry.

ASSET has safeguards in place to prevent changing critical data elements used for performance measurement and Federal reporting. DET recognizes that accuracy is not always possible and that mistakes will be made, regardless of safeguards built into the system.

Policy

All ASSET users are responsible for entering accurate and complete participant data in ASSET. There are several tools and resources available to assist case managers and service providers including:

- [ASSET Users' Guide Index](#)
- [Performance Measure Map](#) and other performance technical assistance guides,
- [Supplemental Employment Data guide](#)
- [Job Center Systems Technical Bulletin \(ASSET InfoLine\)](#)
- ASSET User Group representatives,
- DET Call Center Staff, and
- DET Local Program Liaisons.

Security access levels allow some data changes to be managed locally. ASSET users are expected to proofread their entries, verify entered data (e.g., birth date, services provided, participant characteristics, etc.), review participant records prior to exit for completeness, and ensure that all activities and outcomes are documented to the extent possible before the participant is exited.

There are four access levels for the data change process:

1. Case Manager:

- Enters participant data in ASSET.
- Monitors data in coordination with other case managers or programs providing services to the participant to ensure completeness and accuracy.
- Communicates with other local staff involved with the participant about the nature of the staff request.
- Submits Data Change Requests (for Title 1) to WDB-designated Approver.
- Submits Data Change Requests for TAA directly to DET.
- Ensures that Data Change Requests are detailed and provide sufficient information for the WDB Approver and/or DET ASSET Administrator to make a decision.

2. WDB Approver (for Title 1 only):

- Monitors participant data for completeness and accuracy (quality assurance).
- Reviews data change requests for completeness and compliance with local, DET or Federal WIA program policies and regulations.
- Is accountable for data change requests that are inappropriate or violate local, DET or Federal WIA program policies and regulations.
- Completes changes that can be done locally.
- Approves appropriate requests for action by ASSET Administrators. Requests that relate to performance and program policy are submitted to the Quality Assurance (QA)

Reviewer (i.e., Local Program Liaison) for review. If approved, they place the request in the QA Approved status.

- **Regularly reviews ASSET staff requests (both “needs more information” and “pending”) to ensure timely resolution of questions or issues with the staff data change request.**

3. DET ASSET Administrator:

- Reviews approved data change requests for completeness and accuracy.
- Makes changes if determined appropriate.
- Denies changes if determined inappropriate.
- Refers data change requests back to WDB Approver and/or case manager for further clarification.
- Monitors change requests for trends and common issues that may require policy development, technical assistance, or system changes.

4. DET Quality Assurance (QA) Reviewer:

- Monitors change requests for trends and common issues that may require policy development, technical assistance or system changes.
- Reviews the request to determine its effect on performance measures and program requirements.
- Changes the request status response to QA Approved, Denied, or Needs More Information. (For WIA Title 1, when the Needs More Information response is selected, the WDB Approver is responsible for coordinating the collection of the specified information and resubmitting the Data Change Request for re-consideration for approval or denial.)

The following are general guidelines regarding the types of data changes that may be requested and procedures for making those changes:

1. Changes to Active Participant Records

- If an ASSET field is not grayed out, case managers can make many changes to participant records without submitting a data change request and should do so whenever possible.
- Information in ASSET that is entered on the Manage Programs screens and used to determine program eligibility must reflect the applicant's status on the date that program participation begins and should not be changed after the participation date is established. (Please refer to [WIA Policy update 06-03 Definition of Participant and Exiter](#) for further information about the services that establish participation for each program and program area.)
- Information on the Manage Programs screens that determines a participant's inclusion or exclusion in performance measures should not be changed unless the case manager has supporting documentation to demonstrate that the data was entered in error. Supporting documentation includes written communication from DET Central Office staff that data contradictions exist and need to be corrected.
- The Event History in ASSET allows system users to review changes that were made to each screen in the system. It is not a comprehensive listing; it shows only changes that are important to track for performance measurement, Federal reporting, or other

program compliance purposes. The event history shows what was changed, who changed it, and when the change occurred.

2. Changes to Non-Editable Fields in Active Records

- Any change to a non-editable field must be made by a DET ASSET Administrator. Each change must be clearly described and approved by the WDB-designated Approver (for Title 1). The WDB Approver is responsible for ensuring that changes are reasonable and appropriate. Data change requests will be monitored for trends or patterns and action taken as needed to ensure the process is functioning as intended.
- Case managers may not request that participant data, including actual begin and end dates for services, be removed or enhanced solely to avoid a negative outcome in any program's performance measures. Any data change request that affects the performance measures will be reviewed and monitored. Trends will be noted and addressed through monitoring and technical assistance by DET staff.
- No changes will be made to program participation dates on the Manage Programs, General Program Summary screen, except in extraordinary circumstances.

3. Deletions

Federal policy regarding program exit is clear: "...program exit means a participant has not received a service funded by the program or funded by a partner program for 90 consecutive calendar days, and is not scheduled for future services. The exit date is the last date of service." (*TEGL 17-05.B. Point of Exit for Common Measures Reporting.*)

- Service records will not be deleted without justification. If a service was planned, but never occurred, the case manager may request that the actual service begin and/or end dates be removed from the service screen. If the record is still active, the case manager can do this locally without submitting a change request. A case manager can enter the reason for the change in the Comments field on the relevant service screen.
- DET staff will not delete exits without justification. Typically, exits will not be removed to accommodate local reporting omissions, even though documentation may exist in local participant files and the omitted services may be alluded to in case notes, but the case manager neglected to create an ASSET service screen.

Case managers are responsible for ensuring that the participant's record is complete and accurate before exit occurs. Case managers are expected to monitor the Exit Warning Report in ASSET on a regular basis, especially after services have ended and the participant is expected to exit 90 days after the last service (other than follow-up services) has been closed. At a minimum, the Exit Warning Report should be reviewed weekly.

If a service omission is discovered after exit, case managers should document the service(s) in the participant's case notes and include specific information about the service(s) including start and end dates, contract identification, type of service, outcome of service (i.e., completed, not completed) and retain supporting documentation such as receipts and attendance sheets or service agreements in the participant's file.

- DET staff will not remove or correct case notes unless the case note has been entered in ASSET under an incorrect Personal Identification Number (PIN). Errors in case notes can be addressed by clarifying in an additional case note.
- DET Central Office, WDB and Job Service staff is expected to ensure that local service providers report participant information in ASSET correctly and in a timely manner. This can be accomplished through a combination of data quality assurance review activities using on-line ASSET reports, the Job Center Systems Data Warehouse (WebI) reports, and participant file review prior to exit.
- Reporting errors or omissions that affect performance outcomes will be addressed through technical assistance and corrective action activities arising from performance measure failure. DET will only make adjustments to performance outcomes to prevent performance measure failure if the local board can demonstrate that failure was the result of a problem other than data entry errors or omissions. Adjustments will not be made to change a WDB's eligibility for a performance incentive award.
- DET may employ other technological means to update or correct participant records, contingent upon the availability of time and resources, and a compelling reason to alter the record(s).

4. Duplicate Records

Sometimes, a person may have two or more records in ASSET under multiple Social Security Numbers (SSN) or pseudo numbers and there are services reported under each SSN. The ASSET Change Request should be submitted under the PIN that will be deleted, and a separate request should be submitted for each PIN that should be deleted. DET ASSET Administrators will make the final determination of which record is the correct one; the records will be merged by creating new services under the good SSN and deleting the entire bad SSN record, including services.

Prior to submitting an ASSET Change Request to remove a duplicate record, it is important for the case manager to closely review the ASSET record to determine if the participant is enrolled in other WIA programs. If so, the case manager should consult with/notify the other case manager to avoid confusion.

ASSET Reporting

The Staff Request function in ASSET is the vehicle for requesting changes to participant records. A request should only be submitted if a change cannot be made to the record by local staff.

1. Case managers and WDB staff request data changes using the Staff Request function in ASSET. No changes submitted via email will be accepted.
2. For WIA Title 1, the WDB-designated approver either denies or approves the change, making the necessary changes to the request and saving the screen. The request is then "sent" to DET for review and action. The local approver and case managers should be reviewing ASSET Staff Requests (both "needs more information" and "pending") on a regular basis to ensure that any questions or issues with the request are resolved in a timely manner.

3. When changes are approved, the DET Administrators will make the requested changes and mark the request's status as "Completed". If a change is disapproved, the request's status will be changed to "Denied" and the reason for the denial will be entered into the "Response" field on the change request screen.

WDB staff and case managers will be able to review the status of their changes and the reasons for change request rejections. The staff requests can only be viewed for three months (by the case manager) and six months (by the WDB Approver). Thus, it is imperative that local staff is regularly reviewing ASSET staff requests, especially the "pending" and "needs more information" categories.

The General Request option in ASSET allows users to communicate with one another about a specific customer's record. Its purpose is to assist with case coordination when more than one case manager or program serves a participant. Similarly, workers in one program may create a General Request to a worker for another program. The General Request option should not be used to submit ASSET Data Change Requests to DET.

All case managers should ensure that their email address and telephone number in ASSET is current and correct. In addition, when local staff leaves their employment, DET Security should be informed so the case manager's information can be updated in ASSET.

Action Required

This policy is effective immediately. Questions about this policy should be directed to your Local Program Liaison or TAA Central Office staff.