



Date: February 25, 2005

To: Workforce Development Board Directors

From: Connie Colussy, Director
Bureau of Workforce Programs

Subject: **Revised WIA Policy Update 04-12 ASSET CORRECTION REQUESTS**

Purpose

This provides guidance to Workforce Development Boards (WDBs) regarding the policies for requesting data corrections in the Automated System Support for Employment and Training (ASSET) participant reporting system.

An error has been discovered that affects the specified participant exit date for which data correction requests can be submitted. Under the policy that was issued on January 20, 2005, data correction requests were limited to any participant who exited on or after October 1, 2003. This date has an adverse impact on the *Older Youth Employment and Credential Attainment* and the *Older Youth Employment Retention* performance measures. These performance measures are computed for older youth that exit between April 1 and March 31 of each program year. For Program Year 2004, the reporting period for these measures is April 1, 2003 to March 31, 2004.

The policy has been revised to correct the error. This policy continues to establish deadlines for ASSET data clean-up and corrections as necessary to comply with U.S. Department of Labor (U.S. DOL) data validation requirements. The policy correction is shown in the paragraph below as bolded text; the remainder of the policy is already in effect.

If WDB staff had data correction requests denied because the participant exited WIA Title 1 prior to October 1, 2003, they may resubmit those data correction requests via the ASSET Data Change Request screen. Only data change requests for participants that exited on or after April 1, 2003 will be considered.

Legislative/Regulatory References

- **Workforce Investment Act (WIA) of 1998, Section 185.** Reports; Recordkeeping; Investigations.
- **US DOL TEGL 7-99:** Core and Customer Satisfaction Performance Measures for the Workforce Investment System

Background

The 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 WIA’s above-stated purposes. Case managers, 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 Workforce Solutions (DWS) security systems policy and documented need. Either the participant (through JobNet) or case managers enter initial participant data into the system. Case managers are encouraged 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 edits in place to prevent changing critical data elements that are needed for performance measurement and participant reporting. DWS recognizes that accuracy is not always possible and that mistakes will be made, regardless of safeguards built into the system. The purpose of this policy is to define the processes for changing, updating and removing data from a participant’s record. In July 2004, DWS implemented an on-line data correction requests process in ASSET. The process was enhanced to improve the review and feedback capacity in November 2004.

In Program Year 03 (PY03), U.S. DOL began requiring states to conduct data validation activities on participant data and WIA annual report results. Data validation begins on October 1 of each calendar year, following submission of the State's Annual Report to the U.S. DOL. Data validation looks at participant and performance information for three years' worth of participant data. Wisconsin is required to validate data reported in a sample of participants who either received services or exited any time between July 1, 2001 and June 30, 2004. In subsequent program years, these dates will shift by one year. For example, in PY04, the validation sample will be selected from a file of participants who received services or exited any time between July 1, 2002 and June 30, 2005. To prevent data validation errors, the participant files must reflect the same data that was reported to U.S. DOL in the annual reports. The purpose of this policy change is to establish the timelines for future data correction deadlines.

Policy

There are four access levels for the data correction 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.
- Submits Data Correction Requests to WDB-designated Approver or DWS Administrator.

2. WDB Approver:

- Monitors participant data for completeness and accuracy (quality assurance).
- Reviews data correction requests for completeness and compliance with local, DWS or Federal WIA program policies and regulations

- Is accountable for data correction requests that are inappropriate or violate local, DWS or Federal WIA program policies and regulations.
- Approves appropriate requests for action by ASSET Administrators.

3. DWS Administrator:

- Reviews approved data correction requests for completeness and accuracy.
- Makes changes if determined appropriate.
- Denies changes if determined inappropriate.
- Requests guidance from DWS Quality Assurance (QA) Reviewers when policy is unclear as to the appropriateness of the correction request or when the correction affects performance measures or program requirements.
- Monitors change requests for trends and common issues that may require policy development, technical assistance, or system changes.

4. DWS QA Reviewer:

- Monitors change requests for trends and common issues that may require policy development, technical assistance or system changes.
- Reviews, and approves or denies, correction requests if the correction affects performance measures or program requirements.

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

Case managers can make some changes to participant records without submitting a data correction 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 at the time of eligibility determination and cannot be changed after enrollment, except for name and address changes.

For example: If an applicant receiving Wisconsin Works (W-2) was erroneously reported as not receiving W-2, the entry may be corrected. On the other hand, if ASSET correctly shows that a participant was not receiving W-2 at the time of WIA Title 1 program enrollment, that information must remain on the record even if the participant begins receiving W-2 after enrollment.

Case managers may request changes to other data elements entered in error. As case manager and WDB proficiency with ASSET increases, the rate and types of errors that occur should decrease. Changes of this type will be reviewed and monitored, and addressed through ASSET system fixes, User Manual updates, program policy updates or training, as determined appropriate to correct common reporting errors.

In March 2004, the Event History was added to ASSET to allow 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 Historical Records and Non-Editable Fields in Active Records.

Any change to an historical record or non-editable field must be made by a DWS ASSET Administrator. Each change must be clearly described and approved by the WDB-designated Approver. 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 and WDB staff 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 WIA Title 1 performance measures. Any data correction request that affects the performance measures will be reviewed and monitored. Trends will be noted and addressed through monitoring and technical assistance by DWS staff.

3. Deletions

Federal policy regarding participant exits is clear: "Once a participant has not received any WIA funded or partner services for 90 days, except for follow-up services and there is no planned gap in service or the planned gap in service is for reasons other than those specified above, that participant has exited WIA for the purpose of measurement in 15 of the 17 core measures (the YY skill attainment rate and employer customer satisfaction measures are not based on exit)." (*TEGL 7-99.D. Point of Exit for Counting Outcomes*).

DWS staff will not delete service records without justification. If a service was planned, but never actually occurred, then the case manager may request that the actual service begin and/or end dates be removed from the form. 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 service screen that is changed.

DWS staff will not delete soft exits without compelling documentation in ASSET that the soft exit was applied in error. Maintaining a paper file instead of reporting participant and service information in ASSET is not sufficient justification to support the removal of a soft exit. Case managers and WDB staff are expected to monitor the Soft Exit Warning list in ASSET on a regular basis to prevent soft exits from occurring if a participant is still receiving services other than core self- or informational services. At a minimum, the Soft Exit Warning list should be reviewed weekly.

Sometimes, a person may have two records in ASSET under multiple Social Security Numbers (SSN) and there are services reported under each SSN. When DWS staff determine 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.

Any other circumstances that a case manager or other responsible party believes support the removal of a soft exit or the deletion of data in ASSET will be reviewed on a case-by-case basis. Deletions will be the exception, rather than the rule.

4. Final Cut-off Dates For Requesting Changes

Effective with the publication of the final updated policy, case managers and WDBs will not be permitted to make changes to any participant record if the participant exited before **April 1, 2003**. Beginning with Program Year 2004 (PY04), the final cut-off date for data correction requests will be on September 10th of each program year. After that date, the ASSET data for the program year just ended will be "frozen" and no further corrections to the data will be accepted.

The U.S. DOL has synchronized the quarterly and annual report cycles. The fourth quarter report, which is available in mid-August of each program year, will reflect the participants who will also be reported in the annual report. This gives WDBs four weeks to review the data, request corrections and update participant records to ensure annual report results are as accurate as possible.

ASSET Reporting

Complete instructions for requesting data corrections were provided in the Job Center Systems Infoline that was published on September 24, 2004.

1. Case managers and WDB staff will have access via ASSET to the Data Change Request screen. If the data to be changed affects WIA Title 1 participants, they select the appropriate WDB-designated approver, and ASSET will “send” the request to that individual for review. In most instances, this will be an ASSET User Group representative.
2. The WDB-designated approver either rejects or approves the change making the necessary changes to the request and saving the screen. The request is then “sent” to DWS for review and action.
3. DWS Administrators review the requested change and determine whether or not the change is appropriate and consistent with State and Federal policy. If the Administrators are unable to determine if the change is appropriate, the request will be forwarded to the WDB’s local program liaison and DWS policy staff for review.
4. When changes are approved, the DWS 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 rejection will be entered into the “Description” 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.

Action Required

This policy is effective immediately upon publication. **WDB staff may resubmit data correction requests that were denied because the participant exited prior to October 1, 2003.**