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*Date:* May 16, 2007

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

*From:* Gary Denis, Acting Director  
Bureau of Workforce Programs

*Subject:* **Workforce Investment Act Policy Update 07-04 - ASSET CORRECTION REQUESTS**

### **Purpose**

This policy update provides guidance to Workforce Development Boards (WDBs) regarding data correction requests in the Automated System Support for Employment and Training (ASSET) participant reporting system. This policy update rescinds and replaces WIA Policy Update 04-12: ASSET Correction Requests. This policy update affects Workforce Investment Act (WIA) Title 1, Trade Adjustment Assistance (TAA), WIA Title 3 Veterans and to a lesser extent, WIA Title 3 Wagner Peyser data correction requests.

### **Legislative/Regulatory References**

- WIA of 1998, Section 185. Reports; Recordkeeping; Investigations
- US DOL 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 U.S. 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 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 Family Supports (DFS) security systems policy and documented need. Either the participant (through JobNet) 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 edits in place to prevent changing critical data elements used for performance measurement and Federal reporting. Division of Employment and Training (DET) recognizes that accuracy is not always possible and that mistakes will be made, regardless of safeguards built into the system. However, implementation of a common exit date for WIA Title 1, WIA Title 3 and TAA participants in accordance with Federal reporting requirements has resulted in additional complexities in ASSET. These complexities require changes to DET/DFS data correction policies and practices.

This policy is being updated to address changes in ASSET user security access levels and terminates the practice of removing participant exits for the purpose of allowing local staff to correct data entry errors and omissions. Responses to comments received during the 30-day review period are included in Attachment 1.

## **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 User Guide](#),
- [Performance Measure Map](#) and other performance technical assistance guides,
- [Supplemental Employment Data guide](#),
- ASSET User group representatives,
- DFS Automated Operations Section (AOS) Call Center Staff,
- DET Local Program Liaisons, and
- DET Program and Performance Policy Staff.

Security access levels have been expanded to allow a greater amount of data correction 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 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 DFS Administrator.

### 2. WDB Approver:

- Monitors participant data for completeness and accuracy (quality assurance).
- Reviews data correction requests for completeness and compliance with local, DET or Federal WIA program policies and regulations.
- Is accountable for data correction requests that are inappropriate or violate local, DET or Federal WIA program policies and regulations.
- 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.

3. DFS ASSET Administrator:

- Reviews approved data correction requests for completeness and accuracy.
- Makes changes if determined appropriate.
- Denies changes if determined inappropriate.
- 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 Need More Information. (When the Need More Information response is selected, the WDB Approver is responsible for coordinating the collection of the specified information and resubmitting the 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

- Case managers can make many 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 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/DFS Central Office staff that data contradictions exist and need to be corrected.
- 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 Non-Editable Fields in Active Records

- Any change to a non-editable field must be made by a DFS 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, service providers, WDB and Job Service 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 any program's 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 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.)

- DET/DFS staff will not delete service records without justification. If a service was planned, but never actually 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 service screen that is changed.
- DET/DFS staff will not delete exits 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, service providers, WDB and Job Service staff 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 ID, 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.

- 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.
- DET/DFS Central Office, WDB and Job Service staff are all 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. DWS 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/DFS 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).

## **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 and only if the participant has not yet exited from the current program episode.

1. Case managers and WDB staff request data corrections using the Staff Request function in ASSET.
2. 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/DFS for review and action.
3. All Staff Requests are submitted to AOS Call Center staff except requests that affect performance or require a policy interpretation. Those requests are submitted using the Data Change option as follows:
  - TAA change requests go to the TAA QA Reviewer, and
  - WIA Title 1 change requests go to the Local Program Liaison/QA Reviewer assigned to the Workforce Development Area.
4. When changes are approved, the DFS 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 "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. Questions about this policy should be directed to your Local Program Liaison.

## Attachment 1

### Response to Comments Received During Review and Comment Period

On April 2, 2007, the Division of Employment and Training (DET) distributed proposed policy that changes the process and circumstances for requesting corrections to participant records in the Automated Systems Support of Employment and Training (ASSET) system. This policy affects Workforce Investment Act (WIA) Title 1, WIA Title 3, Veterans, and Trade Adjustment Assistance (TAA) participant records. Comments were received electronically and during telephone conversations with local staff. Some of the concerns local staff expressed merit further discussion and explanation, hence the purpose of this memorandum.

*Comment: Policy must be flexible to allow for extenuating circumstances such as errors that occur when adding or removing data elements and screens in ASSET and the associated programming and performance logic.*

Response: DET staff agree and included language in the policy draft to allow for data corrections when a compelling reason exists to do so. ASSET and Federal program changes have occasionally created problems that could not be detected immediately and the policy will accommodate record changes if and when problems arise that affect large numbers of participant records.

*Comment: Some contractors have limited WIA caseloads and use ASSET infrequently, and therefore may be more prone to mistakes. We do continuous case manager training but mistakes can, and do occur.*

Response: DET staff understand and appreciate the efforts that local staff have made to provide training on data entry. Those efforts are readily apparent in the improved quality of ASSET and performance data. The intent of this policy is to promote earlier detection and correction of participant data. Case managers and WDB staff have 90 days from the date of last service to the execution of the automated exit. The most appropriate time to review and update the ASSET record is during this 90-day period after a case manager adds an Actual End Date to the last open service.

DET staff have produced numerous technical assistance guides, the ASSET On-Line User Manual, technical updates, volumes of data analysis and critiques to identify where reporting problems occur. These documents are readily available and are accompanied by technical assistance and training activities throughout the program year. They are all designed to prevent mistakes from occurring and to help ASSET users report effectively and efficiently from the outset, instead of trying to correct records 2 years after program services have ended.

*Comment: No performance data has been generated since the implementation of common exits on January 27, 2007; therefore, there has been no opportunity to analyze this data to see if the system generated exits are working correctly. If participants are exited because of erroneous logic, the opportunity to correct the mistake(s) must be allowed.*

Response: We acknowledged above that if programming or system errors occur, the policy allows for corrections to be made. The common exit changes imposed by U.S. DOL's Common Measures Policy were extensively tested by BITS and Automated Operations Support (AOS) staff prior to implementation. There are two on-line reports in ASSET that allow local staff to review pending and executed exits. These reports have been available for nearly as long as ASSET has had the capacity to automatically exit participants who are no longer receiving services. This capacity predates the implementation of common exits. Local staff have had the ability to detect "erroneous logic" since the changes were made in January 2007. Performance

reports (which look at participants who exited as long as two years ago) are not needed to determine if the system is exiting participants properly.

Participants go onto the Exit Warning report a minimum of 60 days prior to the exit date's execution. This gives a case manager two months to review, correct and update records either to ensure that all participant data is accurate, or to prevent the exit from occurring if the participant is continuing to receive services. Once the exit has been executed, the participant appears on the Exited Report. Both of these reports are updated daily. If a case manager tried to prevent an exit, but ASSET generated the exit anyway, AOS staff should be contacted immediately to determine if there is a problem with the system.

*Comment: If an LPL would approve any such changes, DET administrative staff should be able to make these changes without having to send the requests to BITS (which is costly).*

Response: The programming changes that have been made to implement the common exit process are complex and touch numerous tables throughout ASSET. This complexity is the result of U.S. DOL's move toward streamlined program management, service delivery and participant/program reporting requirements. It is no longer possible for LPLs to review requests and AOS staff to make data corrections as they were done prior to the implementation of the exit process. Consequently, BITS and AOS staff concluded that all future post-exit data changes must be handled by staff who have extensive knowledge of the programming logic that lies behind the ASSET screens. Because BITS time is costly (\$72/hour), DET staff have concluded that prevention is the best strategy to address data quality.

The change in the policy regarding data correction is one building block in this prevention strategy. DET staff are preparing a training plan that will assist local staff and case managers in properly entering participant data into ASSET. Input from the ASSET User Group has been obtained; further input on training needs and delivery methods will be obtained from ASSET end users who attend the May 30, 2007, Roundtable in Stevens Point. A Data Quality Summit, using WIA Title 1 Technical Assistance and Training funds, is scheduled for mid-August 2007. Representatives from the U.S. DOL National and Regional Offices will be attending to address the increasing emphasis on data quality, and trainers from the Social Policy Research Associates (SPRA) organization will lead and facilitate the day's activities. More interactive performance training sessions are also planned for August and September 2007.

*Comment: While I understand the State's reluctance to make ASSET changes, if a legitimate mistake was made entering data related to performance and this mistake was identified, why shouldn't we get credit for the service - regardless of whether it puts a WDA into contention for performance awards or not?*

Response: The policy does not preclude making corrections when data entry errors occur. It requires that those changes be identified and made before the participant is exited from the program episode. DET staff have been correcting data for the past three years to resolve conflicts that arose during the transition from the Job Training Partnership Act to the WIA, to repair the data problems associated with ASSET's predecessor, and to clarify the purpose and intent of U.S. DOL program and performance reporting policies. These corrections have consumed large amounts of local and State staff time and resources. Changes have been made to the system to minimize reporting errors and local staff are notified as soon as new problems are identified.

The policy strives to be proactive in assuring that data is entered properly, so that it does not have to be corrected later. ASSET User Group representatives have long expressed a need for "real time" program and participant reports. Two locally driven reporting systems - TESSA and Virtual Job Center - are about to be launched and purport to fulfill these report needs in a way that other DET efforts have failed to do. These two tools should go a long way toward assisting local programs in identifying and correcting data entry issues before the participant exits. WDAs should be monitoring and requiring quality data entry at the outset if they want credit for the services provided.

*Comment: Does this policy close the 30-day data correction window between the publication of the WIA Title 1 4<sup>th</sup> Quarter report and the Annual Report?*

Response: Yes. Prior to WIA implementation, data corrections were not permitted once participants had left other programs. Now that Federal WIA policy is more clearly defined and understood, and an array of training and technical assistance guides are readily available to local staff, DET believes it is appropriate to establish a policy that seeks a higher degree of data quality to improve performance outcomes and program management.