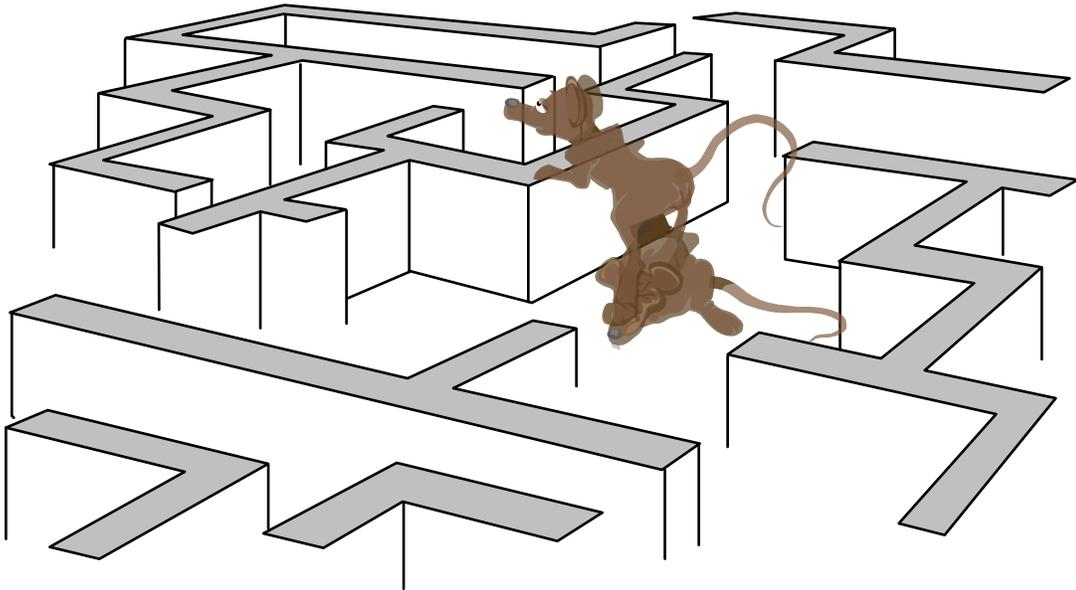


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SUPPLEMENTAL EMPLOYMENT DATA

TECHNICAL ASSISTANCE GUIDE



DEVELOPED BY:
State of Wisconsin
Division of Employment & Training
Bureau of Workforce Training

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Workforce Investment Act, National Emergency Grants & Trade Adjustment Act Supplemental Employment Data Technical Assistance Guide

Performance Measures

The following performance measures require employment information:

1. Adult, Dislocated Worker, NEG, Older Youth and TAA Entered Employment rate;
2. Adult, Dislocated Worker, NEG, Older Youth, and TAA Employment Retention rate;
3. Adult, Dislocated Worker, NEG, Older Youth and TAA Earnings Change;
4. Adult and Dislocated Worker Employment and Credential Attainment rate;
5. Younger Youth Placement and Retention rate; and,
6. All-Youth Placement in Employment or Education rate.

Programs That Use Supplemental Employment Data

The following employment and training programs are permitted to use supplemental employment data in performance measures:

1. WIA Title 1 - Adults, Dislocated Workers and Youth
2. WIA Title 3 - Labor Exchange and Veterans
3. Trade Adjustment Act (TAA)
4. Special Response (SRR) and National Emergency Grants (NEG)

No local or State-managed program is required to gather or report supplemental employment data. It is a costly and time-consuming activity and may not have a positive impact on a program's performance measures. The decision to gather and report is a local decision; DET simply provides a vehicle for reporting this data in ASSET.

Sources of Supplemental Employment Data

U.S. DOL policy states that: "...certain types of employment, particularly self-employment, are either excluded from the sources of data ...or very difficult for grantees to access due to data confidentiality issues. Grantees should not be discouraged from providing entrepreneurial training or assisting the hard-to-serve simply because the subsequent employment is not covered by wage records. Therefore, grantees may use supplemental sources of data to document a participant's entry and retention in employment. All supplemental data and methods must be documented and are subject to audit. Allowable sources of supplemental information for tracking employment-related outcomes in the performance measurement periods include case management notes, automated labor exchange system administrative records, surveys of participants, and contacts with employers."

When determining a participant's employment status after exit, the primary data source for verifying employment is the Unemployment Insurance (UI) Wage Record. About 93% of Wisconsin's employment information comes from the State's UI Wage Record or the Wage Record Interchange System (WRIS) which allows States to verify employment for participants who have left Wisconsin.

Federal policy acknowledges that there are employers and jobs that do not require UI wage reporting. Hard-to-serve and self-employed participants may not enter employment in UI wage-reportable jobs. Therefore, the U.S. Department of Labor (U.S. DOL) allows for the use of other sources to augment employment information when UI wage data does not exist.

Unemployment Insurance (UI) Wage Records are the primary source of post-program employment data used to determine performance. DWD uses the Wage Record Interchange System (WRIS) to check other states' UI records for earnings, as well as the Federal Employment Data Exchange System (FEDES). FEDES contains employment information from the U.S. Department of Defense, the U.S. Postal Service, and the U.S. Office of Personnel Management. DWD also contacts the Wisconsin Department of Military Affairs to verify adults who have joined the National Guard or Reserves, but have not been called to active duty. FEDES and National Guard employment are treated as supplemental employment data in the performance measures.

Documentation of Supplemental Employment Data

Federal policy states that: "a telephone response from the participant must be accompanied by a written document such as a W2 form, pay stub, 1099 form, or other written documentation. Telephone verification of employment with employers is acceptable, but must also be documented. For self-employed individuals, telephone verification with major clients/contracting entities is also acceptable, but must be documented."

Failure to properly document this data will affect the performance results for the WDB as well as the State. If reported supplemental employment data cannot be properly validated and verified by the Local Program Liaisons, this will result in a monitoring finding, a recalculation of the WDB's annual performance results, and the rescission of incentive awards if the WDB received an incentive award and was subsequently determined ineligible for this award without verifiable supplemental employment data.

Acceptable documentation sources include copies of:

1. Participant's W-2 form;
2. Pay check stub;
3. IRS form 1099;
4. IRS form 1040, Schedule C, Profit or Loss from Business (Sole Proprietorship);
5. IRS form 1099-B, Proceeds from Broker & Barter Exchange Transactions;
6. A letter from an employer verifying that the participant was employed during the performance measure reporting quarter(s).
7. Wisconsin form PRA-012, Premier Resort Area Tax Return;
8. Wisconsin form St-12 - Sales and Use Tax Return;
9. IRS 2099, Schedule C-EZ, Net Profit from Business;
10. IRS form 1040, Schedule SE, Self-Employment Tax;
11. Wisconsin form EX-012, Local Exposition Tax Return
12. Wisconsin form S-220a, Schedule P, Attachment to Form BCR, Buyer's Claim for Refund of Wisconsin State County and Stadium Sales Taxes

If the participant is self-employed and provides an IRS 1040, the form must be accompanied by IRS Form 1040, Schedule C at a minimum. For all other participants, an IRS 1040 will be accepted as proof of employment in all quarters after exit, IF the participant provides copies of the IRS forms for the two consecutive years in which performance is measured. This is

necessary because the performance measures cross over calendar years (e.g., April 1, 2004 - March 31, 2005 and October 1, 2004 - September 30, 2005).

This list may not be complete. If local staff have any questions about a particular document, they may request an opinion from DET. Employers do not need to provide specific information about wages. The data that is needed are the dates of employment, the name of the employer, and contact information should additional questions arise.

Impact of Supplemental Employment Data on Performance Measures

1. Participants whose employment is determined by the presence of UI wage record information are counted in all applicable performance measures.
2. UI wage record data overrides supplemental employment data if both are present in any single post-exit quarter and the participant is counted in all applicable performance measures.
3. When UI wage data is present in one or two quarters and supplemental employment data is present in the remaining quarter(s), the participant is counted in performance measures as illustrated in the tables on pages 5 - 10.
4. When employment is determined solely by supplemental employment data in the first, second and/or third quarter after exit, the participant is:
 - a. Added to the Entered Employment Numerator;
 - b. Added to the Employment Retention Numerator and Denominator;
 - c. Excluded from the Average Earnings Numerator and Denominator;
 - d. Added to the Employment and Credential Attainment Numerator (Adults, Dislocated Workers and Older Youth) if the participant received a service; and,
 - e. Added to the All-Youth Placement in Employment and Education Numerator.

Critical ASSET Fields:

1. Manage Follow Ups, Follow Up Status, First, Second and Third Quarter tabs:
 - a. For Supplemental Federal Reporting:
 - Entry of wages is not required, but may be locally useful.
 - Check the radio button for the type of employment that most closely matches your data source.
 - Select the method used to verify supplemental employment data. If verification method is blank, "Not Employed in Quarter" or "Not Verified", the supplemental data will not be used in the performance measure.

Policy References

U.S. DOL TEGL 7-99: Core and Customer Satisfaction Performance Measures for the Workforce Investment System. Published March 3, 2000.

U.S. DOL TEGL 14-03: Performance Reporting Submission Procedures for the Workforce Investment Act Standardized Record Data (WIASRD) and the Annual Report under Title 1B of the Workforce Investment Act (WIA).

U.S. DOL TEGL 17-05: Common Measures Policy for the Employment and Training Administration's Performance Accountability System and Related Performance Issues. Published February 2006.

U.S. DOL TEGL 32-04: State Accomplishment of Performance Goals for Trade Adjustment Assistance and North American Free Trade Agreement Transitional Adjustment Assistance (NAFTA-TAA) Participants. Published May 17, 2005.

Employment-Based Performance Measures

About The Tables

The following tables assume that the participant meets all other criteria for inclusion in either the numerator or denominator for each measure. For example, supplemental employment data has no impact on performance if a participant exited for one of the exclusions or if an exclusion is reported in the first, second or third quarter after exit. These tables only illustrate how supplemental employment data affects performance outcomes on the employment-based measures. DET assumes that WIA Title 3 does not seek out supplemental employment data for its performance, so that program is not included in the descriptions that follow.

Adult, Dislocated Worker, NEG, Older Youth and TAA Entered Employment Rates

What is this Measure?

Of those who are not employed at participation,

The number of adults, dislocated workers, NEG, older youth or TAA participants who have entered employment by the end of the first quarter after exit divided by the number of adults, dislocated workers, NEG, older youth or TAA participants who exit during the quarter.

Entered Employment Rate	Employment Data Source			Impact on Performance Measure		
	Employment Status	UI data either WI or WRIS	Supplemental Employment Data reported and verified	Employment verified through FEDES	In numerator	In denominator
Q1 after exit*	Yes	No	No	Yes	Yes	Yes
Q1 after exit*	Yes	Yes	No	Yes	Yes	Yes
Q1 after exit*	Yes	Yes	Yes	Yes	Yes	Yes
Q1 after exit*	No	No	No	No	Yes	Yes
Q1 after exit*	No	No	Yes	Yes	Yes	Yes
Q1 after exit*	No	Yes	Yes	Yes	Yes	Yes
Q1 after exit*	No	Yes	No	Yes	Yes	Yes

*Assumes Unemployed at Participation

Adult, Dislocated Worker, NEG and TAA Employment Retention Rates**What is this Measure?**

Of those who are employed in the first quarter after the exit quarter,

The number of adults, dislocated workers, NEG or TAA participants who are employed in both the second and third quarters after exit, divided by the number of adults, dislocated workers, NEG or TAA participants who exit during the quarter.

Example	Employment Retention Rate	Employment Data Source		Impact on Performance Measure	
	Employment Status	UI data either WI or WRIS	Supplemental Employment Data reported and verified	In numerator	In denominator
1	Q2 after exit*	Yes	Yes		
	Q3 after exit*	Yes	Yes	Yes	Yes
2	Q2 after exit*	Yes	Yes		
	Q3 after exit*	Yes	No	Yes	Yes
3	Q2 after exit*	Yes	No		
	Q3 after exit*	Yes	No	Yes	Yes
4	Q2 after exit*	Yes	No		
	Q3 after exit*	Yes	Yes	Yes	Yes
5	Q2 after exit*	No	No		
	Q3 after exit*	No	No	No	Yes
6	Q2 after exit*	No	No		
	Q3 after exit*	No	Yes	No	Yes
7	Q2 after exit*	No	Yes		
	Q3 after exit*	No	Yes	Yes	Yes
8	Q2 after exit*	No	Yes		
	Q3 after exit*	Yes	Yes	Yes	Yes
9	Q2 after exit*	Yes	No		
	Q3 after exit*	No	No	No	Yes
10	Q2 after exit*	Yes	Yes		
	Q3 after exit*	No	No	No	Yes
11	Q2 after exit*	Yes	No		
	Q3 after exit*	No	Yes	Yes	Yes
12	Q2 after exit*	Yes	Yes		
	Q3 after exit*	No	Yes	Yes	Yes
13	Q2 after exit*	No	No		
	Q3 after exit*	Yes	Yes	No	Yes
14	Q2 after exit*	No	No		
	Q3 after exit*	No	Yes	No	Yes
15	Q2 after exit*	No	Yes		
	Q3 after exit*	Yes	No	Yes	Yes
16	Q2 after exit*	No	No		
	Q3 after exit*	Yes	No	No	Yes

*Assumes Employed in Q1 after exit based on UI, WRIS or supplemental employment data.

Older Youth Employment Retention Rates

What is this Measure?

Of those who are employed in the first quarter after exit,

The number of older youth who are employed in the third quarter after exit, divided by the number of older youth who exit during the quarter.

Example	Employment Retention Rate	Employment Data Source		Impact on Performance Measure	
	Employment Status	UI data either WI or WRIS	Supplemental Employment Data reported and verified	In numerator	In denominator
1	Q1 after exit	Yes	Yes		
	Q3 after exit	Yes	Yes	Yes	Yes
2	Q1 after exit	Yes	No		
	Q3 after exit	Yes	No	Yes	Yes
3	Q1 after exit	Yes	Yes		
	Q3 after exit	Yes	No	Yes	Yes
4	Q1 after exit	Yes	No		
	Q3 after exit	Yes	Yes	Yes	Yes
5	Q1 after exit	No	No		
	Q3 after exit	No	No	No	No
6	Q1 after exit	No	Yes		
	Q3 after exit	No	Yes	Yes	Yes
7	Q1 after exit	No	Yes		
	Q3 after exit	No	No	No	Yes
8	Q1 after exit	No	No		
	Q3 after exit	No	Yes	No	No
9	Q1 after exit	No	Yes		
	Q3 after exit	Yes	Yes	Yes	Yes
10	Q1 after exit	Yes	No		
	Q3 after exit	No	No	No	Yes
11	Q1 after exit	Yes	Yes		
	Q3 after exit	No	No	No	Yes
12	Q1 after exit	Yes	Yes		
	Q3 after exit	No	Yes	Yes	Yes
13	Q1 after exit	Yes	No		
	Q3 after exit	No	Yes	Yes	Yes
14	Q1 after exit	No	No		
	Q3 after exit	Yes	Yes	No	No
15	Q1 after exit	No	Yes		
	Q3 after exit	Yes	No	Yes	Yes
16	Q1 after exit	No	No		
	Q3 after exit	Yes	No	No	No

Adult, Dislocated Worker, NEG and TAA Average Earnings Measures

Of those who are employed in the first, second and third quarter after exit,

Total earnings in Q2 plus total earnings in quarter 3 divided by the number of participants who exit during the quarter.

Example	Average Earnings	Employment Data Source		Impact on Performance Measure	
	Employment status*	UI data either WI or WRIS	Supplemental Employment Data reported and verified	Earnings are in Numerator	Participant is in Denominator
1	Q2 after exit	Yes	Yes		
	Q3 after exit	Yes	Yes	Yes	Yes
2	Q2 after exit	Yes	Yes		
	Q3 after exit	Yes	No	Yes	Yes
3	Q2 after exit	Yes	No		
	Q3 after exit	Yes	No	Yes	Yes
4	Q2 after exit	Yes	No		
	Q3 after exit	No	No	No	No
5	Q2 after exit	No	No		
	Q3 after exit	No	No	No	No
6	Q2 after exit	No	No		
	Q3 after exit	No	Yes	No	No
7	Q2 after exit	No	Yes		
	Q3 after exit	No	Yes	No	No
8	Q2 after exit	No	Yes		
	Q3 after exit	Yes	Yes	No	No
9	Q2 after exit	Yes	Yes		
	Q3 after exit	No	No	No	No
10	Q2 after exit	No	No		
	Q3 after exit	Yes	Yes	No	No
11	Q2 after exit	Yes	No		
	Q3 after exit	No	Yes	No	No
12	Q2 after exit	No	Yes		
	Q3 after exit	Yes	No	No	No
13	Q2 after exit	Yes	No		
	Q3 after exit	Yes	Yes	Yes	Yes
14	Q2 after exit	No	Yes		
	Q3 after exit	No	No	No	No
15	Q2 after exit	Yes	Yes		
	Q3 after exit	No	Yes	No	No
16	Q2 after exit	No	No		
	Q3 after exit	Yes	No	No	No

*Assumes employed in Q1 after exit and the source of that employment was the UI Wage Record. If Q1 employment was based on supplemental employment data, the participant is not in the average earnings measure.

Older Youth Earnings Change Measure

What is this Measure?

Of those who are employed in the first quarter after exit,

The total post-program earnings (2nd and 3rd quarters after exit) minus the pre-program earnings (2nd and 3rd quarters prior to participation) divided by the number of older youth who exit during the quarter.

Example	Earnings Change Measure	Employment Data Source		Impact on Performance Measure	
	Employment status	UI data either WI or WRIS	Supplemental Employment Data reported and verified	Pre & Post Program Earnings counted In numerator	Participant counted In denominator
1	Q1 after exit	Yes	Yes		
	Q3 after exit	Yes	Yes	Yes	Yes
2	Q1 after exit	Yes	No		
	Q3 after exit	Yes	No	Yes	Yes
3	Q1 after exit	Yes	Yes		
	Q3 after exit	Yes	No	Yes	Yes
4	Q1 after exit	Yes	No		
	Q3 after exit	Yes	Yes	Yes	Yes
5	Q1 after exit	No	No		
	Q3 after exit	No	No	No	No
6	Q1 after exit	No	No		
	Q3 after exit	No	Yes	No	No
7	Q1 after exit	No	Yes		
	Q3 after exit	No	No	No	No
8	Q1 after exit	No	Yes		
	Q3 after exit	No	Yes	No	No
9	Q1 after exit	Yes	Yes		
	Q3 after exit	No	Yes	No	No
10	Q1 after exit	Yes	Yes		
	Q3 after exit	No	No	No	Yes
11	Q1 after exit	Yes	No		
	Q3 after exit	No	Yes	No	No
12	Q1 after exit	Yes	No		
	Q3 after exit	No	No	No	Yes
13	Q1 after exit	No	Yes		
	Q3 after exit	Yes	Yes	No	No
14	Q1 after exit	No	Yes		
	Q3 after exit	Yes	No	No	No
15	Q1 after exit	No	No		
	Q3 after exit	Yes	Yes	No	No
16	Q1 after exit	No	No		
	Q3 after exit	Yes	No	No	No

Adult and Dislocated Worker Employment and Certificate/Credential Attainment Rates**What is this Measure?**

Of those who received training services,

The number of adults or dislocated workers who are employed in the first quarter after exit and received a certificate/credential by the end of the third quarter after exit divided by the number of adults or dislocated workers who exit during the quarter.

Employment & Certificate/Credential Attainment	Employment Data Source			Impact on Performance Measure	
	UI data either WI or WRIS	Supplemental Employment Data reported and verified	Employment verified through FEDES	In numerator	In denominator
Employment Status					
Q1 after exit	Yes	Yes	Yes	Yes	Yes
Q1 after exit	Yes	Yes	No	Yes	Yes
Q1 after exit	Yes	No	No	Yes	Yes
Q1 after exit	No	Yes	No	Yes	Yes
Q1 after exit	No	No	Yes	Yes	Yes
Q1 after exit	No	No	No	No	Yes
Q1 after exit	No	Yes	Yes	Yes	Yes

Assumes the participant received a training service and earned a credential by the end of the third quarter after exit.

Younger Youth Retention Rate

What is this Measure?

The number of younger youth found in post-secondary education, advanced training, employment, military service, or qualified apprenticeships in the third quarter after exit divided by the number of younger youth who exit during the quarter (except those still in secondary school at exit).

Younger Youth Retention	Employment Data Source			Impact on Performance Measure	
Employment Status	UI data either WI or WRIS	Supplemental Employment Data reported and verified	Employment verified through FEDES	In numerator	In denominator
Q3 after exit*	Yes	Yes	Yes	Yes	Yes
	Yes	Yes	No	Yes	Yes
	Yes	No	Yes	Yes	Yes
	Yes	No	No	Yes	Yes
	No	No	No	No	Yes
	No	No	Yes	Yes	Yes
	No	Yes	Yes	Yes	Yes
	No	Yes	No	Yes	Yes

*Assumes the participant did NOT remain in secondary school at exit and is NOT in post-secondary education, advanced training, or qualified apprenticeship. FEDES will confirm military service.

All-Youth Placement in Employment or Education Rate**What is this Measure?**

The number of participants who are in employment or the military or enrolled in post-secondary education and/or advanced training/occupational skills training in the first quarter after exit divided by the number of participants who exit during the quarter.

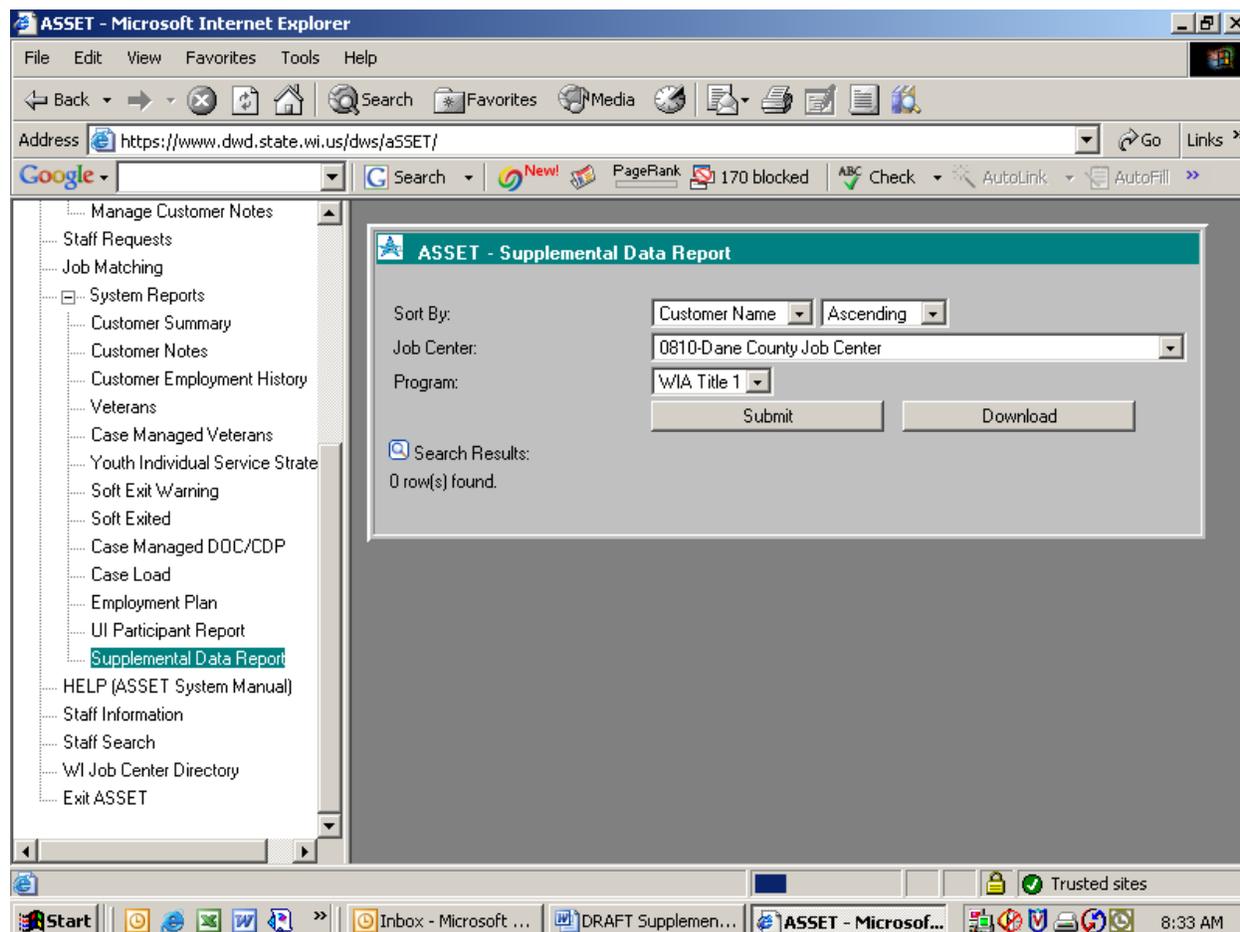
All Youth Placement in Employment or Education	Employment Data Source			Impact on Performance Measure		
	Employment Status	UI data either WI or WRIS	Supplemental Employment Data reported and verified	Employment verified through FEDES	In numerator	In denominator
Q1 after exit	Yes	Yes	Yes	Yes	Yes	Yes
	Yes	Yes	No	Yes	Yes	Yes
	Yes	No	No	Yes	Yes	Yes
	Yes	No	Yes	Yes	Yes	Yes
	No	Yes	Yes	Yes	Yes	Yes
	No	No	Yes	Yes	Yes	Yes
	No	No	No	No	No	Yes
	No	Yes	No	Yes	Yes	Yes

Assumes the participant is not in post-secondary education, employment or the military at the date of participation AND that the participant is not in post-secondary education, advanced or occupational skills training in the first quarter after exit.

Supplemental Data Report

What is this Report?

A system report was created in ASSET to alert staff when supplemental employment data is needed. The screen print shows the report's location in the system menu.



Who is in this report?

Participants who are in the performance measures, and for whom we have no employment information based on the wage record cross matches, appear on this report. Staff can obtain a supplemental data report for participants in WIA Title 1, WIA Title 3 and TAA, because all three programs are permitted to incorporate supplemental employment data into their performance measures.

Once supplemental data is entered for the requested quarter(s) and the record saved, the participant's name drops off the report.

When is this Report Updated?

The report is updated each quarter, shortly after we have completed the UI Wage Record and the WRIS cross matches. This usually occurs about 30 days after the end of the report quarter.

Where is this Report in ASSET?

1. System Reports:
 - a. Supplemental Data Report.
2. Select Sort Criteria:
 - a. Participant Name, PIN, Exit Date or Exit Quarter.
 - b. Ascending/Descending Order.
 - c. Job Center.
 - d. Program (WIA Title 1, Title 3 or TAA).
3. Click Submit or Download.
4. Click on Participant's PIN, which will take you directly to the follow-up summary.
5. Follow-Up Status:
 - a. Select the program for which supplemental data is requested.
 - b. Select the appropriate quarter(s) tab.
6. "For Supplemental Federal Reporting":
 - a. Wages are not a required element.
 - b. Select the appropriate types of employment (out-of-state, self-employment or other).
 - c. Supplemental Data Verification Status.

Note: If the Verification Status field is left blank or "Not Verified" is selected, the supplemental data will not be used. All other responses allow us to use the data in our performance measures. All reported supplemental employment data will be validated during program monitoring or the data validation process.

Why Does a Participant's Name Show Up on the Report When I Know He or She is Working?

There are a number of reasons why this happens:

1. The participant works for an employer or in a job that is not covered by the UI wage record requirements.
2. The participant is in UI-covered employment, but the employer failed to report their earnings to the UI wage record in a timely fashion.
3. The participant is in UI-covered employment, the employer has reported the earnings, but the UI Division has not yet updated the UI wage record.
4. The participant is not employed, despite what he/she may have reported to the case manager.
5. The reported SSNs may not belong to the participants in question, so there would be a mismatch between the SSN and the wage records.
6. If the participant is working in another state, the above reasons may also apply - DET has no control over either the DWD's UI wage processing or other States' processing practices.

7. The case manager has not reported the necessary supplemental employment information in the ASSET fields labeled "For Federal Supplemental Reporting".
8. The timing of the report may be a factor. Participant records are frozen when the annual report is produced to ensure that our results match those in the data validation samples. There may be employers who don't file their wage data until they get very close to the end of the calendar year.

How Come Some Participants Are Not on the Supplemental Data Report and Are Not Showing Up in the Performance Measure Numerators?

1. Employment information that comes from WRIS cannot be disclosed to local boards and case managers under the terms of the WRIS data-sharing agreement. This is because each state has statutory authority to set confidentiality standards for its UI wage data. There is no consistency among the states on confidentiality. Some states treat the data as public information that, subject to minimal requirements, is accessible to nearly anyone who requests it. Other states prohibit access to the data unless the requestor has specific statutory authority to view that information. The most restrictive confidentiality requirements had to be adopted before all states would agree to grant State and Federal access to UI wage data.
2. The participant may be excluded from a performance measure numerator for a reason other than the presence or absence of employment data (e.g. was employed in the first quarter after exit and received a credential-eligible service, but did not earn a credential by the end of the third quarter after exit).

Am I Required to Report Supplemental Employment Data?

Reporting supplemental employment data is subject to local discretion. A WDB or other program manager that has no difficulties with the employment-related performance measures may decide that the effort required to contact the participant and obtain the required documentation is greater than the outcome as it relates to improved performance.

Do I Have to Wait for the Supplemental Data Report to Enter This Information?

No. DET encourages case managers to enter employment information as soon as possible for the following reasons:

1. If the case manager did not obtain this information during follow-up, or didn't make follow-up contact with the participant in the 1st, 2nd and/or 3rd quarters after exit, he/she may not be able to locate the participant. Remember that performance measures look backwards in time. For example, the Average Earnings measures examine participants who exited from the program as long as 2 years ago.
2. If the data is entered as soon as it is obtained, it will reduce the size of the system report and case manager data clean-up activities. The case manager who routinely enters the information as it is obtained will know that any individual who shows up on the report is actually unemployed or unreachable; thus, no further action is necessary.

What Do the "Necessary" and "Not-Necessary" Flags Mean?

Participants who appear on the ASSET supplemental data report are individuals who are being reported in performance measures and Federal program reports. "Necessary" means that we have no evidence of employment through the UI Wage Record and supplemental employment data has not been reported for the quarter(s) in question. "Not Necessary" means either we have verified employment through the wage records or through reported supplemental employment data in ASSET.

On rare occasions, the switch may change from "Necessary" to "Not Necessary" or vice-versa because something changed in the UI wage record. This usually happens long after performance was measured and reported to the U.S. DOL, but can explain why supplemental employment data was requested at one time but the status changed a program year or two later.