

Summary of Comments and DWD-DET's Responses – 12.8 ASSET Service Management

Policy Effective August 1, 2024

1. One commentor suggested changing footnote 1 to 20 CFR § 682.200(l) to reflect WIOA vs. WIA regulations.

DWD-DET has made this correction.

2. One commentor suggested updating the ASSET user guide because language in this guide references WIA and does not incorporate WIOA policy language.

DWD IT staff are updating the ASSET User Guide during calendar year 2024. ASSET users will be notified once the revised Guide is completed.

3. One commentor suggested the addition of certain alerts built into the ASSET system to better manage services, especially planned services. The commentor also suggested to identify in/throughout this policy chapter the WEBI/BI reports that would assist career planners in managing services and service dates.

DWD-DET is working to submit a proposal to the ASSET Change Management Board (ACMB) that will establish an alert/notification function as described above. Access to WEBI/BI reports is generally limited to approved users, often at the supervisory level. For this reason, WEBI/BI reports are not generally referenced in DWD-DET's WIOA policies. No change to the policy language was made at this time.

4. One commentor suggested to provide the definition, by explanation or reference, of Individualized Employment Plan (IEP).

DWD-DET's IEP policy is being finalized and will be ready for state review during summer 2024. The IEP definition will be linked into Service Management policy once the IEP policy becomes effective.

5. One commentor suggested changing the language in the provision

12.8.2-“DWD-DET requires career planners to enter services with Planned Open and Close dates when working with a participant to develop an Individualized Employment Plan (IEP) or Individual Service Strategy (ISS). When a service is actually provided, the planned service must be updated and assigned Actual Open and Close dates to correspond with the dates of service delivery”

The commentor suggested to use “Career planners use ASSET services to develop an Individualized Employment Plan (IEP) with a participant. These services are initially entered with planned open and close dates. When a service is actually provided, the planned service must be updated and assigned Actual Open and Close dates to correspond with the dates of service delivery.”

DWD-DET has updated the language to read “DWD-DET requires career planners to enter all known services with Planned Open and Close dates when working with a participant to develop an Individualized Employment Plan (IEP) or Individual Service Strategy (ISS). Services that are entered with planned dates must be modified to better reflect accuracy as planned dates change.”

6. One commentor suggested a change to the provision on "DWD-DET requires that, at a minimum, WDBs update participant information monthly to ensure monthly dashboards reflect accurate information" to quarterly to align with DOL reporting.

DWD-DET has opted not to change this requirement. Because the accurate entry of service dates is directly tied to participation dates, exit dates, and determining performance cohorts, delays in such data entry could lead to negative monitoring, data validation, and performance implications.

7. One commentor questioned how DWD-DET will track whether or not the requirement to update customer information once a month is being met? What will the ramifications be if DWD finds that a customer record was not updated within a one-month period?

Compliance with this expectation may be evaluated during annual monitoring and/or data validation activities, and may result in required or recommended corrective actions. It is imperative that career planners maintain complete and accurate ASSET records to support the provision of high quality customer service and the development of complete and accurate federal reports, including performance reports.

8. One commentor questioned the requirement that all planned services be included in the individualized employment plan (IEP), citing that staff have struggled with including potential services with specific dates, which they may fully intend to provide but within an uncertain time frame. Also, stating that if the need to update the CEPT employment plan for services not requiring funding was removed, staff would be more likely to report services accurately. As it stands, accurate entry is beyond the control of the staff as they are forced to include services in advance with random dates.

The IEP and/or ISS are intended to establish a service plan that outlines how WIOA program engagement will assist the participant in achieving their identified training and/or employment goals. This plan should include the full range of services determined necessary or helpful in helping the participant achieve their goal(s), which includes training services, supportive services, and/or career services (including follow-up services). DWD-DET understands that the IEP/ISS is a living document and may change over time due to a number of factors and influences but stands by its position that the development of a comprehensive "service plan" is vital in helping to guide an individual's engagement with the program and ensuring successful outcomes.

9. One commentor suggested using a different example of 'Other' funding in place of the PELL Grant funding used in the example due to ongoing confusion over when/how to apply PELL funding when considering funding precedence for WIOA Title I participants.

DWD-DET has modified this example to reflect an alternate funding source.

10. Two commentors questioned when the Career Planner will know the exact date the textbooks were obtained?

12.8.5-"The career planner opens an Other Support Service Assistance service related to the purchase of textbooks to enable participation in an approved training program. The Actual Open and Actual Close dates reflect the date the textbooks were obtained. This date aligns with the related training service entry."

Each school delivers books differently, some are mailed to students while some are picked up directly at the school. Books can also arrive different times. Does the student need to send us the proof of shipment, or the receipt they get when they pick up their books at the school? What if one book is late than the others? Do we need separate services or leave it open? Currently and Other Support Service Assistance for books would be open and closed based on the semester or sometimes the approved voucher date for the books is used. There is then a specific document (i.e., The class schedule or voucher) that can be used to support the service open/close dates. Is this no longer an acceptable way to track an Other Support Service Assistance for books? An obtained date for books seems unrealistic to gather every time for this service.

DWD-DET has revised this language to better reflect that service dates may align with the date that a career planner authorizes the purchase of textbooks. Included in the revised language is a note to add flexibility when the purchase of textbooks may occur before the initial start date of a training program.

11. One commentor suggested changing the paragraph at the example starts with “In general” which implies that there may be exceptions. This should be clarified by either removing it if there are not exceptions or providing more information on what the exceptions may be.

DWD-DET has removed the phrase "In general" from this portion of the policy.

12. One commentor questioned how their WDA opens and closes the Transportation Assistance service for each semester

12.8.5-“The career planner opens a Transportation Assistance service for a participant enrolled in a two-year training program. The career planner continues to provide transportation assistance on a regular basis for the duration of the training program. The Transportation Assistance service remains open for the duration of the training program and is given an Actual Close date when the training program has ended.”

Would this practice no longer be acceptable? We would hesitate to have a planned close date at the end of training because that may give the impression that the program is committing to mileage support for the entire program. What if the program budget changes?

DWD-DET recommends modeling ASSET entry for Transportation Assistance services after the Example provided in the policy. Planned service dates are not viewable by participants, and do not establish a commitment to pay. In alignment with the IEP/ISS Review process, DWD-DET recommends reviewing these services regularly, at minimum once every six months, to determine their ongoing need, availability, and applicability.

13. One commentor suggested that service definitions, as stated in ASSET, should be revisited and possibly revised, stating "It is often difficult to align needed support with a service that fits. (i.e. there is no service that clearly aligns with obtaining an occupational license required for employment after completing a training program (NCLEX, RTA, etc))"

This recommendation falls outside the scope of this specific policy. However, DWD-DET has taken note of this comment and will continue to explore options related to this particular service delivery challenge.

14. One commentor suggested that the verbiage related to Youth Incentives be changed to “at the time it is processed for the youth.” The date will then be pulled from the associated paperwork – as stated, the [career planner] would have to track the request through the fiscal department, which would be time intensive and error-prone.

DWD-DET has revised this section of the policy to clarify the incentive service dates may align with the date the Career Planner authorizes the incentive.

15. One commentor questioned which completion code should be used, in ASSET if an occupational classroom service was closed at the end of the first semester due to a changing fund source.

12.8.7- A participant attends and passes their classes during their first semester but the following semester the fund source will be different than the previous semester.

DWD-DET has updated the policy to address this situation. In this case, career planners should enter the code *Completed a Segment*.

16. One commentor questioned which completion code should be used in ASSET if the occupational classroom service would be closed at the end of the first semester due to the participant dropping out of training.

12.8.7- A participant attends and passes their classes during their first semester of training but then decides to drop out of training.

In this case, career planners should enter the code *Did Not Complete*.

17. One commentor requested clarification and/or examples be given of a service that is planned and started but not successfully completed as intended, and asked what “intended” refers to specifically?

DWD-DET has revised this portion of the policy language from "intended" to "planned" to provide clarity.

18. One commentor questioned whether an open Occupational Classroom service during a planned summer break would be sufficient to justify providing a support service (e.g., paying rent) during the summer months, if the client hasn't found a summer job yet that can support their housing expenses? (assuming housing assistance is on their IEP)

Yes, if housing assistance is on the IEP that support service would not necessarily stop due to summer break, assuming that all other factors guiding allowability of supportive services were met.

A related question asked whether such supportive service costs would be questioned/disallowed if the client unexpectedly dropped out of school prior to resuming classes, as planned, in the fall.

Because service delivery is highly individualized, and circumstances vary between participants for a variety of reasons, DWD-DET cannot provide guidance on this type of hypothetical situation. WDBs should seek technical assistance to address situations of this nature if/when they arise. Please reach out to your assigned Local Program Liaison for assistance, as needed.