

Summary of Comments and DWD-DET's Responses – 8.7 Program Exit

Policy Effective January 1, 2023

1. One commenter questioned where the Service Management Policy is located.

The Service Management Policy has been posted in "draft" format for review and can be viewed here:

<https://dwd.wisconsin.gov/wioa/policy/12/12.8.htm>.

2. One commenter questioned the following provision in the draft policy:

8.7.4- Once a service's Actual Open Date field is entered in ASSET, the participant's episode in ASSET remains open for 90 days after a date is entered in the service's Actual Close Date field.

The commenter suggested the way the wording is phrased, it sounds like the date that the person is keying into the screen affects the timeline. The commenter suggested it might be better to say, "the participant's episode in ASSET remains open for 90 days after the date that is entered in the service's Actual Close Date field."

DWD-DET amended the draft language based on the recommendation. Thank you for the suggestion.

3. One commenter suggested we add another column to the Exit Reports Resources Page, to separate the Report Name and where the report is located.

DWD-DET updated the chart by adding another column to the table identifying the location of the report. Thank you for the suggestion.

4. Several commenters questioned the provision "DWD-DET requires career planners to add any known participant wages into ASSET's Employment tab."

DWD-DET removed this requirement from the Exit Policy because ASSET Exits will capture any employment information. Although the section was removed, responses to the direct questions can be found below.

- a. Are career planners are required to enter any "known" employment at any time during participation? Or only at exit?

There is currently no federal- or state-level reporting requirement to update a participant's employment status throughout the individual's period of participation. Nevertheless, DWD-DET strongly encourages this practice as it helps with case management activities, including situations where a participant is co-enrolled in multiple programs and potentially reduces the burden on the career planner to collect and record this information in the window of time between the participant's last service and program exit.

b. Can DWD further clarify the definition of “known participant wages.”

"Known participant wages" includes any unsubsidized employment income.

c. If career planners only enter participant wages on the Employment tab that they have allowable documentation collected for? Or can wages that a participant self-attests to be entered into the Employment tab?

The participant can self-attest the information entered in ASSET's Employment Details, except when supplemental data is required.

d. Non-WIOA programs are also allowed to use the Employment tab in ASSET (i.e., COW, WAI Program). The COW Program allows self-attestation for employment wages and requires this information to be entered into the Employment tab. When a participant is co-enrolled in COW and WIOA how should Career Planners handle conflicting guidance for how to enter data into the Employment tab?

DWD-DET recommends using the most restrictive documentation in instances of co-enrollment. Career Planners for each program may have different ways to capture and record data. To ensure other programs do not override existing data, career planners should enter case notes with the information they updated.

5. One commenter stated, "currently it is common practice for Career Planners to open an occupational classroom training service at the start of training and close it when the participant completes training or drops out. This means that the service could be open between the end of the spring semester and the start of the fall semester when there is traditionally a summer break. Will this current practice continue to be allowable under this policy? The description in 8.7.3 regarding resuming training after a break between semesters caused Career Planners who reviewed this policy in our region pause that this practice may not be allowable anymore. Clarification would be appreciated.

DWD-DET supports keeping the training service open during a summer break or short durations between classes; however, if the break extends beyond that, such as an entire semester, the service should be closed and reopened. The upcoming Service Management Policy section 12.8.4 provides the following details:

- The single training service can remain open during scheduled breaks (e.g., breaks between semesters, summer break, spring break, legal holidays, etc.) and across multiple program years.
- DWD-DET recognizes certain events will cause a training service to be closed, followed by the opening of the same training service. This occurs when the delayed training is for longer than a scheduled break (e.g., full semester breaks between classes).