

TEXAS WORKFORCE COMMISSION LETTER

ID/No:	WD 06-07, Change 3
Date:	June 1, 2009
Keyword:	TWIST; WIA
Effective:	Immediately

To: Local Workforce Development Board Executive Directors
Commission Executive Offices
Integrated Service Area Managers



From: Laurence M. Jones, Director, Workforce Development Division

Subject: **The Workforce Information System of Texas: New Data Integrity Process—*Update***

PURPOSE:

To provide Local Workforce Development Boards (Boards) with additional updated information and procedures on the data integrity process in The Workforce Information System of Texas (TWIST), specifically, the approval or denial of a data integrity request.

CHANGES TO WD LETTER 06-07, Change 2:

New information in this WD Letter is indicated by:

- A ~~strikethrough~~ of the original language, which indicates that language has been deleted; and
- **Bold** typeface, which indicates new or clarifying language.

BACKGROUND:

Texas Workforce Commission (Commission) rule §800.104(a) states that “Boards are responsible for complete and accurate data entry prior to Commission established deadlines.”

Up-to-date, complete, accurate, and supported data in TWIST is essential to:

- protecting data integrity;
- ensuring that federal and state reports contain complete, correct, and consistent data; and
- evaluating and projecting performance, funding, and outcomes.

In August 2001, the 60-day edit request was implemented to prohibit entering, deleting, or changing specific data and customer records in TWIST after 60 days. However, the regularity and volume of the requests have far exceeded what was

originally anticipated. The process of reviewing and approving 60-day edit requests is cumbersome and costly.

Therefore, the Commission has instituted a new TWIST data integrity process to:

- replace the 60-day edit process;
- streamline the steps required to enter approved changes in TWIST; and
- maintain the integrity of the data by limiting edits to fields that impact performance reporting.

PROCEDURES:

Boards must develop and implement:

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- strong oversight and monitoring data integrity initiatives to ensure the timely, complete, and accurate entry of customer data into TWIST; and
- procedures for the routine and systematic review of customer data entered into TWIST to ensure the timely, complete, and accurate entry of the data.

New TWIST Data Integrity Process

Boards must be aware that the new, online, TWIST data integrity process encompasses and streamlines all phases of the previous 60-day edit process, including:

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- initial request;
- review;
- approval or denial;
- data entry; and
- Board notification.

Timelines under the New TWIST Data Integrity Process

Boards must be aware of the following:

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- The timelines for the new data integrity process are based on the performance reporting schedule. Federal reporting runs on a calendar quarter basis. Approximately 45 days after the end of a calendar quarter, states must report data on the prior four complete calendar quarters.
- The TWIST data integrity (*DINT*) edit (i.e., the ability to add, modify, or delete customer data) is set 20 days after the end of the calendar quarter (quarter + 20). This allows state office staff approximately three weeks in which to analyze data and prepare quarterly reports for submission to the U.S. Department of Labor and other federal oversight agencies.

Data Integrity Change Request

Boards must:

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- discontinue using the “Request Form for Override of 60-Day Edit Period” Excel spreadsheet; and
- begin submitting requests for customer data changes using the *DINT* change request in the online *change window* in TWIST.

Boards must ensure that the Board executive director or designee:

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- reviews the *DINT* change request in TWIST prior to submission to state office staff to ensure appropriate justification (such as protecting data integrity) for the modification of data exists; and
- approves the *DINT* change request in TWIST, after determining that the request is valid and meets program guidelines.

Additionally, Boards must be aware that when state office staff approves a *DINT* change request, the modified data is updated automatically and saved immediately in TWIST, thereby eliminating additional errors.

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Boards must be aware that:

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- Boards are solely responsible for approving all *DINT* change requests;
- state office staff will automatically concur with Board approvals of *DINT* change requests—except for those that change a period of participation (PoP) or change population levels retroactively, which will be denied;
- **the Commission will closely evaluate this process to ensure there is sufficient local oversight of *DINT* change requests; and**
- **there are extenuating circumstances under which a *DINT* change request can be approved or denied—whether or not population levels or PoPs are affected. These circumstances include, but are not limited to, the following:**
 - **A TWIST data entry error from a previous PoP is preventing new service information from being recorded in TWIST for a new PoP; or**
 - **A violation of established and issued policy.**

Boards must be aware that changes to PoPs submitted through the *DINT* process:

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- will not be automatically denied for the following funding streams:
 - Workforce Investment Act (WIA) statewide alternative funds;
 - WIA local activity funds;
 - WIA statewide initiative funds; and
- will be reviewed on a case-by-case basis and approved provided that the PoP changes:
 - were not effective prior to July 1, 2007; and
 - do not impact other funding streams.

Approval Authority for Data Integrity Change Requests in TWIST

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Boards must designate user rights for approval authority of a *DINT* change request. User rights are assigned in TWIST under the *Functional Area Privileges* tab below the *WDA Administration* icon. The *Functional Area Privileges* tab contains three new options that represent varying levels of approval authority:

- Office Data Integrity
(Level 1 of the approval process – may be Board or Texas Workforce Center staff)
- LWDB Data Integrity
(Level 2 of the approval process – Board executive director or designee)

- TWC DIU Data Integrity
(Level 3 of the approval process – only for state office staff)

INQUIRIES:

Direct inquiries regarding this WD Letter to wfpolicy.clarifications@twc.state.tx.us.

RESCISSIONS:

WD Letter 06-07, Change 2

REFERENCE:

United States Department of Labor Training and Employment Guidance Letter 14-00, Change 1, issued November 19, 2001, and entitled “Guidance on the Workforce Investment Act (WIA) Management Information and Reporting System”

Texas Workforce Commission General Administration Rules: 40 TAC §800.104(a)

FLEXIBILITY RATINGS:

No Local Flexibility (NLF): This rating indicates that Boards must comply with the federal and state laws, rules, policies, and required procedures set forth in this WD Letter and have no local flexibility in determining whether and/or how to comply. All information with an NLF rating is indicated by “must” or “shall.”

Local Flexibility (LF): This rating indicates that Boards have local flexibility in determining whether and/or how to implement guidance or recommended practices set forth in this WD Letter. All information with an LF rating is indicated by “may” or “recommend.”