

TAA/WIA Integration Questions & Answers

Revised: 8/16/05

FINANCIAL:

Question: Who will be paying the invoices for TAA/WIA?

Answer: At this time, all invoices related to the TAA training will be paid by ODJFS Unemployment Compensation Trade Central Office. Due to programming issues and the on-going maintenance of the payment of UC benefits, training invoices must come to Columbus for processing. Additionally, Pilots will have to provide UC Trade with the name, address and email address for the local designee for whom they would like to have invoice copies sent/emailed, once said invoices have been paid. The Pilots should encourage the Training Providers to send original invoices to UC Trade Central Office in order to ensure faster payment because UC Trade Central Office can only pay an original invoice.

Question: How will locals pay providers using trade money? How will money be disbursed?

Answer: Local training providers will be paid by UC Trade via an ODJFS warrant. Funds will not be distributed to the local areas for processing of warrants.

Question: The majority of pilot areas would like the funds to flow in the same manner as the current WIA funds. Will this be an option?

Answer: Local areas will have the ability to obligate funds. There will be no draw process like the WIA funds. All approvals will be sent to ODJFS for processing and payment.

Question: Can training be paid with trade money prior to end of term (i.e. once the system is liable for costs?)

Answer: In accordance with recent opinions issued by DOL and OBM, Trade training can be paid for prior to the completion of the training. Once the eligible TAA person passes the duration of the training provider's refund policy, the invoice should be sent to UC Trade Central Office for processing.

This change in policy will be effective September 1, 2005 and will be implemented on a statewide basis. The Office of Unemployment Compensation will communicate to field staff and training providers regarding this change.

Question: Will there be an RMS code for Trade?

Answer: No. Trade eligible workers are a subset of the dislocated workers and the "dislocated worker" option is already identified in the RMS.

Question: How will internal controls be ensured at the state and at the local level?

Answer: **State:**
UC Trade staff will ensure that each local area's application meets the 6 criteria. All processing of locally-approved trade eligible contracts will be processed by ODJFS. UC Trade will also provide technical assistance to the local areas regarding compliance and monitoring of the TAA program. The Pilots will provide UC Trade with a completed form indicating their contract signatories. Upon submission of said form, UC Trade will provide the Pilots with a Rubber Stamp of the Signature of Ohio's TAA Coordinator. Pilot signatories must place a back slash and then their initials immediately after the Rubber Stamp of Ohio's TAA Coordinator on the TAA Contracts.

Local Area:
The local area will ensure that the TAA applicant meets all TAA and WIA eligibility requirements for co-enrollment in both programs if applicable. Eligibility for WIA and TAA for the pilots will be subject to UC Trade and ORAA monitoring for compliance purposes.

Question: What will be the process to obligate funds?

Answer: Local Pilot areas will be able to submit their requests to obligate funds via the Rapid Response process. UC Trade will obligate funds to a local pilot area utilizing an incremental funding methodology. Once a local area has demonstrated a need past the initial obligation authority, a request can be made for additional obligational authority. This will be the same methodology for long-term training needs that exceed the state fiscal year. The local area will need to request carry-over funds for additional funding or long-term needs.

With respect to the authority granted to the local Pilot areas to obligate Trade monies, the local Pilot areas have the authority to obligate all reasonable costs associated with the TAA training.

Question: How will an area request funds?

Answer: The area will request funds via the Rapid Response application.

Question: Will the request be by county or One Stop Area?

Answer: The request will have to be made to UC Trade Central Office by the Pilot area, not by individual county or One-Stop Area.

Question: How will Trade training costs going to be managed at the local level?

Answer: The local area will be responsible managing the obligations against the unobligated funds. This is the same process as managing the WIA obligations against the allocation and the liquidation of expenditures.

Question: Is Trade being recommended as the dollar of last resort?

*Answer: The decision regarding which funding stream to use will be determined by and at the local level. However, it is important to remember that Trade dollars can only be used in accordance with the 6 criteria and for a maximum of 104 **instructional** weeks (130 if combined with remedial training). Accordingly, it is recommended that WIA pay any pre-Trade certification services including training. With regard to any class work that goes beyond the 104 instructional weeks, WIA will have to fund.*

Question: What is reasonable cost for training in trade?

Answer: A draft Guidance Policy is being distributed for your review and comment. The Guidance Policy, in final form, will be released by September 1, 2005.

WIA does not define reasonable cost. WIA utilizes “customer choice” through the Individual Training Account (ITA). An individual may choose to attend a training institution appropriateness, being an Eligible Training Provider via the state approved list, and the availability of funds (WIA, Pell, OIG, other).

SERVICE DELIVERY:

Question: Does the BRI have to be done by a Wagner Peysers Staff person?

Answer: No. The BRI can be done by other One Stop partners. ODJFS can provide the pilot site with a BRI presentation to facilitate other One Stop partner’s participation in the BRI process. It is important that the same message and information be conveyed to the individual in order to insure they he/she is able to make the most informed choice regarding potential training and on-going benefits. However, pursuant to federal regulations, UC Trade Central Office must disseminate the BRI packets to trade-eligible dislocated workers. Additionally, in an effort to maintain the accuracy and consistency of the message conveyed regarding eligibility for regular UC and extended UC/TRA benefits, UC Trade Central Office will retain its role as lead or co-lead at BRI sessions for the foreseeable future.

Question: Are the Vet Staff included in this process?

Answer: No. Vet staff are not included in the pilot regarding TAA at this time. Vet staff provide more intensive services as opposed to the self-service environment.

Question: Can TAA contracts be approved at the local Level?

Answer: Yes, but only for the pilot areas. Local approval will be required for TAA only and TAA contracts that meet the local WIA eligibility for consideration and appropriateness of WIA enrollment. For co-enrollment purposes, there must be sign off by both the TAA representative and the WIA representative.

Question: How do we address various ITA policies from county to county within a One Stop service system?

Answer: This is a local decision and should be addressed in the same manner as any other dislocated worker seeking training from one county to another and/or within the same One Stop system.

Question: Currently, TAA pays for only 104 instructional weeks of training (130 weeks if remedial training is necessary and documented). If co-enrolled, can WIA pay for training prior to TAA and post TAA?

Answer: Generally yes for pre-Trade training, but Trade's 6 criteria must be met in order for Trade funding to pick up upon certification. With respect to post-Trade funding, one of Trade's 6 criteria requires there to be a "reasonable expectation of employment following completion of the training." As such, we are currently seeking an opinion regarding whether Trade must be the dollar of last resort.

Question: TAA has a timing issue regarding the 30-day waiver and the beginning of training. This is tied to the cash income maintenance benefits. Can we ask US DOL for a waiver regarding this?

Answer: No, we cannot because the language mandating this is contained in federal law and is not waivable by the Secretary of DOL.

Question: TAA does not have a required minimum GPA. TAA has a requirement within a major field of study but not GPA requirement. WIA on-going eligibility usually has a GPA requirement. PELL/OIG have GPA requirements. Does this need to be addressed at the local level?

Answer: Since Trade requires Trade claimants enrolled in training to make satisfactory progress towards certification, contracts funded with Trade dollars can include a requirement that claimants maintain a GPA of 2.0. If a Trade claimant fails to make satisfactory progress and/or is on academic probation, Pilot staff are strongly advised to consult with Trade Technical Assistance because Trade regulations provide that Trade can pay for a course only once. Moreover, Trade benefits are limited to a finite period of time. A modification to a Trade Training Contract must meet Trade's 6 Criteria and the 104 instructional week limit. Accordingly, Trade Technical Assistance will offer guidance in an effort to ensure continuing

compliance with Trade laws and regulations and good customer service.

Question: TAA only pays for school for 2 years. WIA usually does not fund 2-year degrees. How will this be addressed?

Answer: This is a local decision.

Question: A TAA training must be in a state-approved demand occupation and must be on the VTAA occupation in order for training to be approved. Will this be applicable under the pilot?

Answer: Yes, TAA will only fund training that is considered to be in a demand occupation. ODJFS will work with the local pilot areas to provide training and/or technical assistance regarding Labor Market Information (LMI) and the various tools to facilitate this decision from the state's perspective.

There are instances where the local labor market information may not be reflective of the regional and/or local trends. In situations where there is evidence of a demand occupation (i.e. firm offer of employment), Trade Technical Assistance will work with the individual area on a case-by-case basis.

Question: How will local TAA and WIA staff know if the training is on the demand occupations list? Will training be provided?

Answer: Refer to the previous answer.

Question: Demand Occupations via WIA are defined locally. Demand Occupations via TAA are defined by ODJFS (OCSIS OOH). How will the information be shared regarding common elements of the list? What if the demand occupation is not on the respective list?

Answer: Refer to the previous answer.

TRAINING ISSUES:

Question: Who will be training the staff?

Answer: Once training needs are determined, ODJFS (UC, OWD, Local Operations) will be providing technical assistance to address areas of need. As previously stated, the local areas will be responsible for providing training to their One Stop partner staff regarding local processes and service delivery issues.

Question: Who will be providing supervisor training?

Answer: ODJFS and UC Trade will be providing technical assistance regarding the implementation of training. ODJFS will be providing additional resources at the local level once a need is identified by the local areas. Further, UC Trade has scheduled two one-day training sessions for August 23 and 25. UC Trade will then offer follow-up training sessions in early October to address issues that arise during the first month of the Pilots.

Question: Who will be providing Provider Training?

Answer: Due to the fact that UC Trade will be paying the invoice at Central Office, UC Trade will be communicating to the local training providers regarding payment of the invoice and timing around the submission of the invoice in relationship to the refund period as opposed to the invoice being submitted after the training is completed.

Question: TAA pays for fastest path back to employment. WIA legislation mandates customer choice. How are these two different philosophies to be reconciled when they can be in conflict with each other and cut-off benefits to the customer?

Answer: This is a local decision. UC Trade will offer technical assistance.

FORMS:

Question: BRI/ WIA/TAA Forms – Can they be consolidated into one document for the customer?

Answer: This is primarily a local decision. If a local area creates a form or forms, which it believes contains all fundamental elements, it is encouraged to submit said form(s) to UC Trade Technical Assistance for review and approval.

Question: If we use our local form and incorporate the required elements for both programs including the 6 Criteria, can TAA/WIA provide guidance and/or approval prior to implementation?

Answer: UC Trade and OWD will provide guidance and/or approval regarding the required eligibility requirements of each respective program. OWD and UC Trade will not comment on the processes and or thresholds that would allow an individual to progress from Core to Intensive and Training.

CASE MANAGEMENT:

Question: Who will do case management for those who will be enrolled in a training program and or co-enrolled in both the WIA and TAA program?

Answer: This is a local decision.

Question: Where will the forms (originals) reside?

Answer: The local One-Stop will serve as the official repository of the original contract and other case management documents, including the assessments. The local case manager will mail a copy of the contract and other relevant documentation to: Sonia Simms, Pilot Program, 145 S. Front, 3rd Floor, Columbus, OH 43215. The local case manager should attach a cover sheet to the contract and include a local designee's email address so that UC Trade can notify the designee that the contract has been received and entered into OJI.

DATA COLLECTION:

Question: Do we need to be able to match the social security to the county of residency and or county of dislocation?

Answer: Yes. This will enable UC Trade to most efficiently enter and process the contracts for payment while simultaneously maintaining other related benefits.

MONITORING OVERSIGHT:

Question: Will the WIA/TAA Assessment Record satisfy WIA monitoring?

Answer: The draft template that was formulated by the State Pilot team was provided to all pilot areas for consideration. If a pilot area chooses to utilize another form other than the one previously provided, it should be submitted to OWD/TAA for consideration to determine if it meets all required criteria. If a pilot area chooses to utilize a locally-developed Assessment Record that has not been approved by ODJFS, it may not satisfy the monitoring elements for TAA and WIA.

INFRASTRUCTURE ISSUES:

Question: Currently Local Operations outstations staff in different locations to help with TAA eligibility and on-going assistance. How will Local Operations support a large Trade eligible dislocation?

Answer: Local Operations has in place SWAT Teams (special workforce action teams) that are able to be mobilized to an event immediately. We have resources in many areas, with the Trade expertise, that can assist with local service delivery issues upon request.