

TAA and DW Co-Enrollment FAQ #3: TAADI and PIRL

Co-Enrollment and TAA Data Integrity (TAADI)

Q1: *Which co-enrollment types are measured in the TAADI?*

ANSWER: Co-Enrollment with WIOA Adult (Data Element 903) and WIOA Dislocated Worker (Data Element 904).

- The reported values are either 1, 2, or 3 on at least one of these elements, and
- Records with Date of First TAA Benefit or Service (PIRL 925) during or before the current report quarter who have a Date of Program Exit (PIRL 901) either in the current report quarter or blank (not yet exited).

Q2: *Why does the TAADI measure focus on WIOA Title I Dislocated Worker and Adult?*

ANSWER: Co-enrollment between the TAA Program and WIOA DW drives the opportunity for collaborative partnership of funds, human resources, and system development to maximize the utility of benefits for participants that should be the hallmark of federally funded programs.

We have also found that co-enrollment with WIOA Dislocated Worker improves outcomes for the participant. For additional information on this, see [TAA and DW Co-Enrollment FAQ #1](#).

TAADI reviews co-enrollment with Title I programs (Dislocated Worker and Adult), but not Title III. Except for rare exceptions, all TAA adversely affected workers meet the definition of a dislocated worker under Title I of WIOA. There are also instances, when in accordance with WIOA sec. 133(b)(4) and 20 CFR 683.130, a Local Workforce Development Board may transfer up to 100 percent of a program year allocation for adult employment and training activities, and up to 100 percent of a program year allocation for dislocated worker employment and training activities, between the two programs (subject to the Governor's written approval). Therefore, TAADI examines co-enrollment with these Title I programs.

Q3: *Why doesn't the TAADI co-enrollment measure focus on Title III Wagner-Peyser?*

ANSWER: While Wagner-Peyser provides a suite of valuable job seeker and career services, it is not guaranteed to provide the individualized career services to participants that drive early intervention, including assessments. As such, it does not have the same impact on program delivery and performance outcomes.

Q4: *Why does the TAADI measure not focus on Dislocated Worker Grants (DWGs)?*

ANSWER: DWGs are not included in the TAADI calculation because the focus is on long-term collaboration and program delivery that is not applicable to discretionary grants. Additionally, DWGs are typically for layoffs of 50+ workers. While TAA has certifications that are 50 or larger, approximately 50% of determinations in Fiscal Year 2017 had certified worker groups under 50.¹

Q5: *Does receiving Rapid Response services count as co-enrollment for the purposes of TAADI?*

ANSWER: No. Rapid Response (PIRL 908) is not specific to a participation. Instead, it is a status of whether the participant received Rapid Response services or not. Note that as stipulated in Sec.221(a)(2)(A) of the Trade Act, as amended, Rapid Response is required for all TAA petitioning worker groups. To be considered co-enrollment, the participant needs to be enrolled in a program and receive continuous services. For example, under WIOA Dislocated Worker, a participant will receive additional and ongoing case management services.

Q6: *Should participants receiving only RTAA payments be co-enrolled with WIOA Title I Dislocated Worker?*

¹ MIS data: 10/1/16-9/30/17, as of 8/6/18.

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ANSWER: Yes. They will also be included in the TAADI calculation if they are a current participant that quarter (see Q1 above). For more information on the basis of the requirement to provide RTAA –only participants with case management services, see [TAA and DW Co-Enrollment FAQ #2](#).

Co-Enrollment and PIRL Reporting

Q1: *If I submit a full PIRL file, will edit checks for all the programs run?*

ANSWER: Edit checks will run for all programs selected when you upload your file. If you select that you are submitting only for TAA, only the edit checks for TAA will run. If you select that you are submitting for multiple programs, edit checks for all programs will run. While some edit checks are unique to a program, edit checks do not conflict. These are the data element flags that trigger each program's edit checks to run on the record:

Program Name	Element Number	Element Name	Criteria
Wagner-Peyser	918	Wagner-Peyser Employment Service (WIOA)	Equals 1
WIOA Adults	903	Adult (WIOA)	Equals 1, 2, or 3
WIOA Dislocated Workers	904 OR 909	Dislocated Worker (WIOA) OR Rapid Response (Additional Assistance)	Equals 1, 2, or 3
WIOA Youth	905	Youth (WIOA)	Equals 1, 2, or 3
Dislocated Worker Grants	932	National Dislocated Worker Grants (DWG)	Equals 1
TAA	925	Date Of First TAA Benefit Or Service	IS NOT NULL
Jobs for Veterans' State Grants (JVSG)	914	Veterans Programs	Equals 1 or 2*
National Farmworker Jobs Program (NFJP)	941	National Farmworker Jobs Program	Equals 1*
Indian and Native American Program	913	Indian And Native American Programs	Equals 1
Reentry Employment Opportunities (REO) (Adult)	936	Reintegration Of ExOffenders (Adult)	IS NOT NULL
Reentry Employment Opportunities (REO) (Youth)	937	Reintegration Of ExOffenders (Youth)	IS NOT NULL
YouthBuild	919	Youthbuild (WIOA)	IS NOT NULL
H1B	938	H-1B	IS NOT NULL
Job Corps	911	Job Corps (WIOA)	Equals 1

*Values only applicable for PIRL files submitted starting with the September 30th, 2018 reporting period.

Q2: *TAA requires 10 quarters of exiters reported in each submission, but WIOA does not report on participations that exited before July 1st, 2015. How can I submit the Full PIRL for TAA participants that includes all 10 quarters of exiters?*

ANSWER: This scenario is only applicable until file submissions for the September 30, 2018, reporting period. Starting with submissions of files for the December 31, 2018, reporting period, WIOA and TAA will both require the same participant cohort. If submission of a joint file causes edit check issues for co-enrolled TAA participants that

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are not included in WIOA, states may submit the file twice: Once selecting WIOA programs and once selecting TAA as the program.

Q3: *If a participant is co-enrolled in TAA and WIOA Dislocated Worker, should I report all training expenditures in Current Quarter Training Expenditures (PIRL 1324) and Total Training Expenditures (PIRL 1325)?*

ANSWER: No. Only TAA-funded training should be reported in Current Quarter Training Expenditures (PIRL 1324) and Total Training Expenditures (PIRL 1325).

Q4: *What impact does co-enrollment have on Date of Program Exit (PIRL 901)?*

ANSWER: If the state has a Common Exit policy, benefits and services provided under all programs delay Date of Program Exit (PIRL 901). Only once no benefits or services are provided for 90 days under any program and no future benefits or services are scheduled, will the participant exit. TAA benefits and services provided after a participant is employed, such as Reemployment Trade Adjustment Allowance (RTAA) delay exit. The TAA Program does not have follow-up services, but follow-up services provided under partner programs do not extend exit. Receipt of TRA is considered a service under the TAA Program and will extend the Date of Exit. If a state does not have a Common Exit policy, only benefits and services under the particular program determine Date of Program Exit (PIRL 901).

Q5: *Is Common Exit required for reporting co-enrolled participants?*

The short answer is no. WIOA Regulations specify that states are “highly encouraged” to implement a Common Exit policy. However, where the reporting of co-enrolled participants occurs, it should be understood that if a state does *not* apply Common Exit to reporting on these participants, their performance may be measured in a manner that does not take into account all of their scheduled services under a co-enrolled strategy. If participants who are co-enrolled are not reported in a manner that reflects Common Exit, then they may be exited before they have received all partner program services, and will therefore be measured for post exit employment outcomes *while they are still receiving services from partners*. In summary, while reporting co-enrolled individuals using Common Exit policy is not required, not using Common Exit policy would jeopardize the state’s ability to get a performance outcome that gives them a practical return on investment, not only in terms of employment, but also in terms of tracking credentials, and wages that represent the highest possible outcomes for the individual.