

RICK SNYDER  
GOVERNOR



CHRISTINE QUINN  
DIRECTOR

**OFFICIAL**

E-mailed: 09/18/15 (pv)

**Workforce Development Agency (WDA)**  
**Policy Issuance (PI): 15-21**

**Date:** September 18, 2015

**To:** Michigan Works! Agency (MWA) Directors

**From:** Joe Billig, Director, Office of Talent Policy and Planning  
Workforce Development Agency

**SIGNED**

**Subject:** Trade Adjustment Assistance (TAA) Program Plan Instructions for Fiscal Year 2016 (October 1, 2015 through September 30, 2016) and Allocations for Appropriation Year (AY) 2014, for use October 1, 2014 through September 30, 2016

**Programs  
Affected:**

Trade Act of 1974, as amended

Trade Act of 2002

Trade and Globalization Adjustment Assistance Act (TGAAA) of 2009

Trade Adjustment Assistance Extension Act (TAAEA) of 2011

Trade Adjustment Assistance Reversion 2014

Trade Adjustment Assistance Reauthorization Act (TAARA) of 2015

**Rescissions:** WDA PI 13-33 Change 1

**References:** The Trade Act of 1974, Public Law (PL) 93-618, as amended

The Trade Act of 2002, PL 107-210



Victor Office Center | 201 North Washington Square, 5<sup>th</sup> Floor | Lansing, Michigan 48913  
517.335.5858 | TTY 888.605.6722

The Trade and Globalization Adjustment Assistance Act (TGAAA) of 2009, PL 111-520

The Trade Adjustment Assistance Extension Act (TAAEA) of 2011, PL 112-40

The Trade Adjustment Assistance Reauthorization Act (TAARA) of 2015, PL 114-27

U.S. Department of Labor Training and Employment Guidance Letters (TEGLs) No. 11-02 (and subsequent changes), 22-08 (and subsequent changes), 10-11 (and subsequent changes), 07-13, 12-13, 01-14, 20-14, and 40-14

WDA PI 13-27, issued March 26, 2013, and subsequent changes

WDA State of Michigan PI 11-23, issued March 12, 2012

Bureau of Workforce Transformation (BWT) PI 10-21, issued January 26, 2011

BWT PI 09-21, issued November 23, 2009

Bureau of Workforce Programs PI 07-18, Change 2, issued December 22, 2008

**Background:** TAA is a federal program that assists U.S. workers who have lost their jobs as a result of foreign trade. The program seeks to provide adversely affected workers with opportunities to obtain the skills, credentials, resources, and support necessary to become reemployed.

WDA has identified AY 2014 funding to support TAA program activities for the period October 1, 2014 through September 30, 2016. Funding expended to date for the period October 1, 2014 through September 30, 2015 is not included in this policy issuance.

This policy issuance encompasses all TAA funds management requirements and policies.

**Policy:** Program Funds

TAA program funds can be used to fund the following TAA services (and all allowable benefits that accompany the services):

- Classroom Training
- On-the-Job Training

- Customized Training
- Registered Apprenticeship Training
- Job Search Allowances
- Relocation Allowances

Examples of allowable benefits that accompany these services include (but are not limited to):

- Travel and subsistence costs
- Books
- Required education supplies
- Course fees
- Other items/services deemed necessary by the training institution for completion of the program

#### Administrative Funds

Up to 5 percent of total program (training, job search and relocation) expenditures may be used to support the local administration. It is prohibited to take administrative funds from the expenditure of Case Management funds.

TAA administrative funds can be used for the following:

- Salaries and benefits for staff:
  - Providing program services
  - Providing program oversight
  - Monitoring and reviewing program operations
  - Providing outreach and education to employers and eligible workers
  - Collecting, validating, and reporting required information
- Program related supplies, equipment, travel, postage, utilities, rental, and maintenance of office space
- Re-engagement of TAA workers efforts
- One-Stop infrastructure costs (as part of the MWA's current cost allocation plan)
- Integration of the TAA program into the One-Stop (local coordination)
- Business Services activities that contribute to the employment of TAA customers

## Case Management Funds

The TGAAA of 2009, TAAEA of 2011 and TAARA of 2015 require that Case Management services are designated and provided to adversely affected workers.

Allowable Case Management activities include the provision of:

- Comprehensive Assessments
- Individual Service Strategies
- Training Information
- Financial Aid Information
- Employability Skills Assistance
- Career Counseling
- Labor Market Information
- Supportive Service Information

The following are additional allowable Case Management activities for the TGAAA of 2009, TAAEA of 2011 and TAARA of 2015:

- Staff time spent conducting TAA program monitoring/auditing
- Staff time spent on participant data-entry into the One-Stop Management Information System (including entry of case notes)
- Staff time spent on benchmarking
- Staff time spent on the development and tracking of training plans
- Staff time spent on the removal of employment barriers
- Staff time spent on issuing, continuing, extending and revoking Waivers from Training
- Staff time spent on follow-up/outcomes
- Skills transferability analysis
- Peer counselors
- Costs associated with training of TAA and non-TAA staff on the TAA program, including activities and services available to TAA participants
- Case management tools and equipment (including electronic equipment)
- Re-engagement of TAA workers efforts
- Rent and utilities for the support of TAA staff

- One-Stop infrastructure costs (as part of the MWA's current cost allocation plan)
- Business Services activities that contribute to the employment of TAA customers

**Note:** In cases where costs may be applied to one or more funding source, the MWA must charge costs in accordance with their existing policy, which requires consistent treatment across programs, as well as adherence to the period of performance in which the funds were authorized.

Case Management funds made available under this policy may not be used to support reemployment services for participants certified under the Trade Act of 2002 or Reversion 2014.

### Merit Staffing

Please refer to BWT PI 10-21 for TAA Merit Staffing requirements.

### Allocations

The formula to determine MWA awards considers a 50 percent weighted average on currently enrolled participants and a 50 percent weighted average on currently enrolled participants in training. Case Management funding awards were calculated by determining 35 percent of the total MWA AY 2014 award. A minimum of \$100,000 total allocation was provided to all MWAs.

The AY 14 TAA Allocations Table has been included in this policy issuance as Attachment A.

### Fiscal Policies and Procedures

There will be no carry-forward of unexpended funding awarded in this policy issuance.

Grantees are required to report all financial transactions on a full accrual basis.

MWAs must process and access all cash requests through the Management of Awards to Recipients System (MARS) in accordance with the MARS manual. The MWA must maintain appropriate documentation to support each cash draw.

All reporting of fiscal expenditures of the funds provided through this grant must be reported to the WDA on a quarterly basis. A final closeout report is also due. All quarterly financial expenditure reports are due to the WDA no

later than the 20th calendar day after the end of the calendar quarter. The final close-out report is due to the WDA no later than 60 days after the end of the grant period. In the event that the due date falls on a weekend or state government holiday, the report is due on the last business day prior to the 20th. Submit reports to the MARS system at: <http://www.michigan.deleg-mars.org/>. If there are any questions, please call Mr. Kerry Trierweiler at (517) 241-1788.

In the MARS, AY 2014 TAA expenditures shall be reported under:

**Grant** – AY14 Trade Adjustment Assistance

**Project** - Trade

**Note:** Specific cost categories that are available include Administration, Case Management, Job Search Allowances, Relocation Allowances, and Training.

MWAs may request additional TAA funds if the MARS awards are exceeded by contacting Ms. Tammy Flynn, TAA Manager, by e-mail at [flynnt@michigan.gov](mailto:flynnt@michigan.gov) or by phone at (517) 335-4267.

Please refer to the WDA Procurement Policy Issuance 15-12, issued July 17, 2015, or any policy replacing WDA PI 15-12, for further information regarding profit and corresponding limitations.

To maximize Workforce Innovation and Opportunity Act (WIOA) Dislocated Worker funding, MWAs should continually evaluate WIOA Dislocated Worker training participants to ensure TAA-eligible individuals are funded by TAA, when appropriate. The WDA encourages continual dual-enrollment of TAA participants into the WIOA programs.

#### Training Cap Waivers

The WDA eliminated the state annual training cap (and waiver process) for TAA participants. However, the MWA must continue to assist TAA customers in choosing training that is available at a reasonable cost.

In approving training, the following must be considered (from 20 CFR 617.22):

“Available at a reasonable cost means that training may not be approved at one provider when, all costs being considered, training substantially similar in quality, content and results can be obtained from another provider at a lower total cost within a similar time frame. It also means that training may not be approved when the costs of the training are unreasonably high

in comparison with the average costs of training other workers in similar occupations at other providers.”

In determining whether the cost of a particular training program is reasonable, first consideration must be given to the lowest cost training which is available within the commuting area. When training substantially similar in quality, content and results is offered at more than one training provider, the lower cost training shall be approved.

Justification for the training program approved must be included in the case file (including training institution cost comparisons). If a training program is chosen at a higher cost than other similar training programs, justification must be contained in the case file explaining why the program was approved.

#### Plan Instructions

The TAA plan shall consist of the following:

- 1) Budget Information Summary (BIS) – Attachment B
- 2) Plan Narrative
- 3) Plan Approval/Modification Request

**Action:** Local areas are required to submit one Budget Information Summary and Plan Narrative within 30 calendar days from the issue date of this policy issuance to [TAA@michigan.gov](mailto:TAA@michigan.gov).

Local areas are also required to submit one signed Approval Request form, with original signatures from the Chief Elected Official(s), Workforce Development Board Chair, or their designee(s) in accordance with WDA PI 14-14 and WDA PI 14-14, Change 1. Approval Request forms must be submitted within 30 calendar days from the issue date of this policy issuance to:

Ms. Pam Vance  
Workforce Development Agency  
Office of Talent Policy and Planning  
TAA Section  
Victor Office Center  
201 North Washington Square, 5<sup>th</sup> Floor  
Lansing, MI 48913

**Inquiries:** Questions regarding this policy issuance should be directed to your TAA State Coordinator at (517) 335-5858. The information contained in this policy issuance will be made available in an alternative format (large type, audio tape, etc.) upon request to this office.

**Expiration**

**Date:** September 30, 2016

JB:TF:pv  
Attachments

**TAA**  
**Plan Approval/Modification Request**  
**Instructions**

**Identifying Information**

1. Michigan Works! Agency (MWA): Enter the name of the MWA.
2. MWA Number: Enter MWA number.
3. Program Title: Enter the appropriate program title. “TAA Program” has been preprinted.
4. Policy Issuance (PI) Number: Enter the appropriate PI number. “15-21” has been preprinted.
5. Plan Period: Identify the plan’s time period covered. “10/01/14 through 09/30/16” has been preprinted.

**TAA  
Plan Approval/Modification Request**

1. Michigan Works! Agency (MWA):	2. MWA Number:
3. Program Title(s):  TAA Program	
4. Policy Issuance Number:  15-21	5. Plan Period:  10/01/14 through 09/30/16

The Chief Elected Official (CEO[s]) and WDB hereby approve the TAA Program plan on file at the MWA.

Authorized CEO	Date
Authorized CEO	Date
Authorized CEO	Date
WDB Chairperson	Date

08-08 (Revised)

The Workforce Development Agency State of Michigan, in compliance with applicable federal and state laws, does not discriminate in employment or in the provision of services based on race, color, religion, sex, national origin, age, disability, height, weight, genetic information, marital status, arrest without conviction, political affiliation or belief, and for beneficiaries only, citizenship or participation in any federally assisted program or activity.

**Trade Adjustment Assistance (TAA)  
Plan Narrative (Fiscal Year 2015)**

A. Michigan Works! Agency (MWA) Identification Information

1. Identify the MWA contact person (including e-mail and phone number) for purposes of discussing the TAA plan contents.

B. Design and Governance

1. How is the TAA program a part of the MWAs local strategic planning process?
2. How are services coordinated with WIOA?
3. How does the TAA program's training and other benefits factor into the MWA's plan to effectively meet the needs of employers in the local area?
4. Who are the service providers for TAA (if the MWA does not provide direct delivery of TAA services)? Please describe how the MWA or the staff meet the Merit Staffing requirements for TAA?
5. How does the MWA ensure all TAA determinations are provided in writing and include access to the protest and appeal process?

C. TAA Services

1. What process is used for contacting all adversely affected workers upon certification (including the process used to ensure all certified workers are contacted for the duration of the certification)?
2. Explain the MWA's local TAA intake process, including WBOs.
3. What process is used to guide the adversely affected worker in determining the best approach for returning to sustainable work, in view of the worker's current skills, knowledge and abilities, and those which the worker would need to obtain to be successful?
4. What Labor Market Information (LMI) sources, including local, are utilized in assisting adversely affected workers (determining if the worker has suitable employment, determining if the worker has a reasonable expectation of becoming employed following the completion of training, etc.)
5. Describe the development of Individual Service Strategies.
6. What is the MWA local policy for issuing, reviewing, extending, and revoking Waivers from Training?

7. For the Trade Adjustment Assistance Extension Act of 2011, Trade Adjustment Assistance Reversion 2014, and Trade Adjustment Assistance Reauthorization Act of 2015, what specific criteria are needed to allow the issuance of a Waiver from Training?
8. What strategies are utilized to inform and advertise Job Search and Relocation Allowance benefits?
9. How does the MWA approve and document the six TAA training criteria (for approval of TAA training)?
10. What opportunities are TAA-certified workers provided to enter Employer-Based Training?
11. How does the MWA ensure Benchmark requirements are met, and appropriate steps are taken after Benchmark failures?
12. How and when are ATAA/RTAA participants notified of potential eligibility?

**TAA**  
**Budget Information Summary Instructions**

**Section I - Identification Information**

Michigan Works! Agency (MWA): Enter the name of the MWA.

Policy Issuance: Enter the Policy Issuance number applicable for the BIS. (“15-21” has been entered.)

Grant Name: Enter the name of the grant associated with the funding being awarded. (“AY14 Trade Adjustment Assistance” has been entered.)

Project Name: Enter the name of the project associated with the funding being awarded. (“Trade” has been entered.)

Plan Period: Enter the start and end dates of the plan period. (“10/01/14 to 09/30/16” has been entered.)

**Section II - Total Funds Available**

Program Award: Enter the amount of the program allocation.

Case Management Award: Enter the amount of case management allocation.

**Section III - Current AY Planned Expenditures by Cost Category**

Administration: Enter amount of allocation planned for administration. MWAs may not expend more than 5% of total expenditures on administrative activities.

Case Management: Enter amount of the allocation planned for case management activities. MWAs were awarded 35% of the program award for case management activities.

Job Search: Enter amount of allocation planned for job search allowance activities.

Relocation: Enter amount of allocation planned for relocation allowance activities.

Training: Enter amount of allocation planned for training activities (and related costs).

**Section IV – Limitation Percentages**

This section was developed to assist the MWA and TAA state coordinators in reviewing planned expenditures and to ensure MWAs are in line with required percentages.

**TAA AY 2014 Allocations**

Michigan Works! Agency		Program Award (Job Search, Relocation, Training)	Case Management Award	Total Funding
<b>West Michigan Works</b>				
		\$1,505,379	\$526,883	\$2,032,262
	Allegan	\$171,782	\$60,124	\$231,906
	Barry	\$94,379	\$33,033	\$127,412
	Ionia	\$41,944	\$14,681	\$56,625
	Kent	\$1,014,507	\$355,077	\$1,369,584
	Montcalm	\$34,789	\$12,176	\$46,965
	Muskegon	\$73,904	\$25,866	\$99,770
	Ottawa	\$74,074	\$25,926	\$100,000
<b>Berrien/Cass/Van Buren</b>				
		\$318,667	\$111,533	\$430,200
	Berrien	\$173,199	\$60,619	\$233,818
	Cass	\$61,047	\$21,366	\$82,413
	Van Buren	\$84,421	\$29,548	\$113,969
<b>Capital Area</b>				
		\$184,234	\$64,483	\$248,717
	Clinton	\$29,723	\$10,403	\$40,126
	Eaton	\$43,130	\$15,096	\$58,226
	Ingham	\$111,381	\$38,984	\$150,365
<b>DESC</b>				
		\$1,521,944	\$532,681	\$2,054,625
	Wayne (Detroit)	\$1,521,944	\$532,681	\$2,054,625
<b>Great Lakes Bay</b>				
		\$883,015	\$309,054	\$1,192,069
	Bay	\$226,614	\$79,315	\$305,929
	Gratiot	\$25,224	\$8,828	\$34,052
	Isabella	\$51,424	\$17,998	\$69,422
	Midland	\$182,761	\$63,966	\$246,727
	Saginaw	\$396,992	\$138,947	\$535,939
<b>Macomb/St. Clair</b>				
		\$2,098,708	\$734,547	\$2,833,255
	Macomb	\$1,772,887	\$620,510	\$2,393,397
	St. Clair	\$325,821	\$114,037	\$439,858
<b>Northeast</b>				
		\$74,073	\$25,927	\$100,000
	Alcona	\$4,977	\$1,742	\$6,719
	Alpena	\$17,233	\$6,032	\$23,265
	Cheboygan	\$14,198	\$4,969	\$19,167

	Crawford	\$7,657	\$2,680	\$10,337
	Montmorency	\$4,524	\$1,583	\$6,107
	Oscoda	\$4,127	\$1,445	\$5,572
	Otsego	\$14,136	\$4,948	\$19,084
	Presque Isle	\$7,221	\$2,528	\$9,749
Northwest		\$265,640	\$92,975	\$358,615
	Antrim	\$18,745	\$6,561	\$25,306
	Benzie	\$15,193	\$5,318	\$20,511
	Charlevoix	\$23,273	\$8,146	\$31,419
	Emmet	\$34,690	\$12,142	\$46,832
	Grand Traverse	\$85,496	\$29,923	\$115,419
	Kalkaska	\$14,724	\$5,153	\$19,877
	Leelanau	\$19,123	\$6,693	\$25,816
	Manistee	\$19,413	\$6,795	\$26,208
	Missaukee	\$10,720	\$3,752	\$14,472
	Wexford	\$24,263	\$8,492	\$32,755
Oakland		\$1,914,840	\$670,194	\$2,585,034
	Oakland	\$1,914,840	\$670,194	\$2,585,034
Region 7B		\$74,074	\$25,925	\$99,999
	Arenac	\$9,076	\$3,176	\$12,252
	Clare	\$15,475	\$5,416	\$20,891
	Gladwin	\$12,334	\$4,317	\$16,651
	Iosco	\$13,313	\$4,659	\$17,972
	Ogemaw	\$11,900	\$4,165	\$16,065
	Roscommon	\$11,976	\$4,192	\$16,168
SEMCA		\$811,781	\$284,124	\$1,095,905
	Monroe	\$210,584	\$73,705	\$284,289
	Wayne	\$601,197	\$210,419	\$811,616
Southwest		\$536,104	\$187,637	\$723,741
	Branch	\$43,713	\$15,300	\$59,013
	Calhoun	\$146,120	\$51,142	\$197,262
	Kalamazoo	\$281,290	\$98,452	\$379,742
	St. Joseph	\$64,981	\$22,743	\$87,724
Upper Peninsula Talent Council		\$222,223	\$77,775	\$299,998
	Alger	\$3,319	\$1,161	\$4,480
	Delta	\$15,653	\$5,478	\$21,131
	Dickinson	\$11,459	\$4,010	\$15,469
	Marquette	\$29,772	\$10,420	\$40,192
	Menominee	\$10,743	\$3,760	\$14,503
	Schoolcraft	\$3,129	\$1,095	\$4,224

	Chippewa	\$48,869	\$17,104	\$65,973
	Luce	\$7,661	\$2,681	\$10,342
	Mackinac	\$17,544	\$6,141	\$23,685
	Baraga	\$7,447	\$2,606	\$10,053
	Gogebic	\$14,112	\$4,939	\$19,051
	Houghton	\$34,357	\$12,025	\$46,382
	Iron	\$11,171	\$3,910	\$15,081
	Keweenaw	\$2,023	\$708	\$2,731
	Ontonagon	\$4,964	\$1,737	\$6,701
<b>GST Michigan Works</b>		<b>\$699,173</b>	<b>\$244,710</b>	<b>\$943,883</b>
	Huron	\$11,408	\$3,993	\$15,401
	Lapeer	\$29,550	\$10,342	\$39,892
	Sanilac	\$14,118	\$4,941	\$19,059
	Tuscola	\$18,998	\$6,649	\$25,647
	Genesee	\$531,814	\$186,135	\$717,949
	Shiawassee	\$93,285	\$32,650	\$125,935
<b>SE MI Consortium</b>		<b>\$562,929</b>	<b>\$197,025</b>	<b>\$759,954</b>
	Washtenaw	\$231,157	\$80,905	\$312,062
	Livingston	\$202,274	\$70,796	\$273,070
	Hillsdale	\$18,516	\$6,480	\$24,996
	Jackson	\$67,963	\$23,787	\$91,750
	Lenawee	\$43,019	\$15,057	\$58,076
<b>West Central</b>		<b>\$156,926</b>	<b>\$54,925</b>	<b>\$211,851</b>
	Lake	\$7,970	\$2,789	\$10,759
	Mason	\$30,576	\$10,702	\$41,278
	Mecosta	\$40,696	\$14,244	\$54,940
	Newaygo	\$46,661	\$16,332	\$62,993
	Oceana	\$11,959	\$4,185	\$16,144
	Osceola	\$19,064	\$6,673	\$25,737
<b>State Total</b>		<b>\$11,829,710</b>	<b>\$4,140,398</b>	<b>\$15,970,108</b>