Theberge, Timothy - 1:02 PM:
Good afternoon or good morning depending on where you are joining us from.

Theberge, Timothy - 1:02 PM:
Welcome to our 5th scheduled chat! The purpose of this forum is to provide an opportunity to share with your peers on challenges and solutions in the effective operation of the TAA Program. Today’s topic is the staffing flexibilities now allowed under the TAA regulations, specifically 20 CFR 618.890.

Theberge, Timothy - 1:03 PM:
A couple of ground rules to support multiple conversations occurring at the same time. If you’re responding directly to individual comments or questions, please reference the person in question by using an @ sign and then their first name. So, for example, if Beth from MA wanted to ask about states or locals are redesigning their customer flow, it would be helpful if she started off like this:

Customer flow – [Question or statement goes here.]

Then you can reply to Beth like this:

@Beth - [Answer or follow-up goes here]

Theberge, Timothy - 1:04 PM:
We have a group of OTAA staff on here as well to be able to provide you links and resources and answer your questions if you peers cannot.

As a reminder, we will be issuing a transcript of this chat to all registered participants. The contents of this chat should be considered technical assistance and not official guidance of the Department.

Theberge, Timothy - 1:05 PM:
And - with that - welcome to today's chat. Any leading questions or concerns about the new staffing flexibilities in the TAA Final Rule? What are your concerns? Any remaining questions we didn't answer in the Rule?

Theberge, Timothy - 1:07 PM:
I can't imagine there are no questions...

Grant, Kelli - 1:07 PM:
How does DOL envision coenrollment occurring? For example, it feels as if coenrollment was envisioned as a seamless, or perhaps automatic, process that occurs simultaneously with TAA enrollment.
Theberge, Timothy- 1:07 PM:
@Kelli - Great question

Theberge, Timothy- 1:08 PM:
So, remember, Rapid Response and WIOA Career Services are actually required when the petition is filed.

McGowan, Franklin- 1:08 PM:
Do states still have the flexibility on merit staffing as far as implementing the final rule or not?

Theberge, Timothy- 1:08 PM:
This means that many TAA participants should have already received some type of service before they ever end up in TAA.

Theberge, Timothy- 1:09 PM:
@Franklin - Yes. States have the option to use the flexibility or not.

Grant, Kelli- 1:09 PM:
@Tim, yes, that is what my next question was going to be....so, really, they should already be enrolled with WIOA prior to their enrollment with TAA, in theory and idealistically

Theberge, Timothy- 1:09 PM:
@Kelli - The statute argues for that, yes.

Pelletier, Judy- 1:10 PM:
@Tim, That is true for new enrollments and new trade certifications. But if we are working w/ older enrollments and now looking at co enrollment? We do provide WIOA info at RR but our WOIA providers in the past have not co enrolled unless there was a definite need.

Johnson, Staci- 1:10 PM:
Good afternoon all, Beth from MA is unable to join today, I am sitting in for her. Just an FYI I am a Operations Manager in a local career center. We have had much success with our customer flow as well as all staff providing Trade services to our customers. I am happy to share our experience on the local level as well as best practices if anyone is interested.

Theberge, Timothy- 1:11 PM:
@Judy - If you are asking about whether individuals already enrolled prior to the Rule, arguably, no. They were not under the same requirement. I would argue however, there is almost never a reason not to co-enroll,

worden, susan- 1:11 PM:
@Staci thanks - For everyone else, keep in mind MA had a waiver on Merit Staffing under previous regs so they have experience in the flexibilities discussed today!

Waters, Jhansi- 1:11 PM:
@Tim after co-enrollment with WIOA (when petition is filed), then petition is certified, could we use the initial assessment provided by WIOA prior to individual eligibility?

Theberge, Timothy- 1:12 PM:
And the requirement isn't to just provide info on WIOA when the petition is filed, it's to provide actual services.
Theberge, Timothy - 1:13 PM:
@Jhansi - Yes - as long as it addresses the requirements of the Rule - we addressed this in the preamble and the rule text. We encourage the use of partner assessment and absolutely do not want you to duplicate your efforts.

Criscuolo, Joe - 1:13 PM:
TAA case management funding can be charged by partner staff providing TAA services?

Story, Christy - 1:13 PM:
Customer Flow- What is your normal Customer Flow for a new participant that comes to your Job Center? We will say the participant received RR/ETT services and information at that meeting and walked in to the Job Center...

Waters, Jhansi - 1:13 PM:
@Tim - Got it. thanks!

Theberge, Timothy - 1:13 PM:
@Joe - Yes - Effective 09/21/2020

Pelletier, Judy - 1:14 PM:
@Staci, Would you share a basic customer flow w/ WIOA/Trade involvement w/ us? Or do you have one case manager enrolling for both programs?

Herndon, Eloise - 1:15 PM:
Tim, what happens when an employer who was already reviewing a line for out of the country work, then shut down due to COVID-19, they then made the decision to send the work out of the country, sending letters to the workers in June. How does that effect their application for a petition since no Rapid Response services took place?

Wood, Tamara - 1:15 PM:
@Tim - With past co-enrollments, TAA paid all training costs and WIOA did case management for TAA participants (funded with WIOA funds, not TAA). Now that merit staff restrictions have changed, WIOA may request compensation from TAA. I assume there will need to be an MOU in place, but what’s a good way to determine a fair reimbursement?

Saito, Sarah - 1:15 PM:
Re; TAA case management funding charged by partner staff providing TAA services: MN would like to hear ideas on how states determine how/how much/when partner staff charge into TAA case management funds.

Theberge, Timothy - 1:16 PM:
@ Eloise - I'm not sure I follow. Whether or not rapid response services were provided has no impact on the investigation of a petition.

Theberge, Timothy - 1:17 PM:
@Tamara - I presume you mean from this point forward. In short, if a WIOA counselor spends 1 hour of their time with a TAA participant on an assessment or what have you, they would charge that hour to TAA instead of WIOA. This is a rough example.

Johnson, Staci - 1:18 PM:
@Judy, all customers who are seeking services are flowed into the career center the same way, they register on our statewide job bank JobQuest and them register for a Career Center Seminar, which
provides them with an overview of services. Upon completion of the CCS all staff meet individually with all participants for a brief assessment. A future appointment is made for a more comprehensive assessment. As we are now operating virtually this also provides us with a method to be sure that we do not lose anyone.

Hoekstra, Robert- 1:19 PM:
@ Eloise - also please note that the requirement to provide rapid response does not require that it be done on-site. If the company is closed (due to covid or other reasons) then RR can still be provided at another site or online

franklin, Joan- 1:19 PM:
To be sure, A WIOA counselor can also charge to TAA

Story, Christy- 1:19 PM:
@ Staci Would you share your normal customer flow?

Grant, Kelli- 1:19 PM:
@Tim, but, to clarify, charging to TAA funding could only occur after a TAA petition is certified and the participant is enrolled in TAA? I realize that seems like an obvious answer, however I am just covering all the bases...

Theberge, Timothy- 1:19 PM:
@ALL - Remember, you cannot charge to TAA until a certification is issued and the worker has been deemed individually eligible.

Theberge, Timothy- 1:19 PM:
@Kelli - Exactly correct.

Theberge, Timothy- 1:20 PM:
Everything between Petition and Certification must be RR, DW, WP, etc. Not TAA.

Johnson, Staci- 1:20 PM:
@Christy I just shared above, please let me know if you have additional questions.

Herndon, Eloise- 1:20 PM:
@Tim, so I was questioning based on your statement "So, remember, Rapid Response and WIOA Career Services are actually required when the petition is filed"; but thank you for the response.

Theberge, Timothy- 1:21 PM:
@Eloise - Yes, sorry. The statute requires the provision of those services, but failure to provide them has no impact on whether we would certify or deny a petition.

Herndon, Eloise- 1:22 PM:
@Hoekstra, thank you, we will have to work with that employer.

Story, Christy- 1:22 PM:
@ Staci- Thank you, Do you have separate WIOA & TAA case managers or do your case managers enroll in both programs? Do you enroll in WIOA and refer to TRADE or vice versa?

Grant, Kelli- 1:25 PM:
@Christy, good question, I would like to know as well
Parchment-Roehrich, Claudette- 1:25 PM:
Possible, we will have a new Commander & Chief, is there going to be any changes how we handle TAA as a whole with customers, or you cannot say at this moment.

Nance, Alisa- 1:25 PM:
State Training - Will DOL provide training to each state so each state can then train partner staff regarding WIOA services with TAA funding?

Hardy, Frances- 1:26 PM:
@Alisa great question

Theberge, Timothy- 1:26 PM:
@Alisa - Please ask your Regional Office. They can work with us to schedule state-specific sessions.

Allen, Monique- 1:27 PM:
@Tim - Can WIOA services occur before layoff?

Nance, Alisa- 1:27 PM:
@Timothy- Thank you.

Theberge, Timothy- 1:28 PM:
@Monique - YES! Layoff aversion is REQUIRED under WIOA. Please make sure to read the RR section of the WIOA Rule and, importantly, the preamble of the WIOA Final Rule.

Johnson, Staci- 1:28 PM:
@Christy our case managers enroll in both programs, when our customers meet with a staff member, that staff member can provide any service to them as they are cross training in all programs ie; Dislocated Worker, Adult, Trade, RESEA the non merit base staff currently do not have access to the DUA database, all merit base staff does, that is the only difference in duties, however, all staff provide UI services in some shape or form, those that do have access to the DUA database share information with those that don't. Merit based staff and partner staff are collocated. With all of this said, we have found that this is a better experience for our customers and the staff are challenged as they have to keep apprised of the entire operation.

Warner, Elizabeth- 1:28 PM:
@Eloise - we have been delivering all Rapid Response sessions/services remotely and employers have been extremely happy with the flexibility this option offers their workers. All partners and programs participate. hopefully your employers will find this approach beneficial.

Baker, Julie- 1:29 PM:
@Alisa - also note that each of the trainings held for the TAA Final Rule were recorded and are available on the TAA Community on WorkforceGPS (https://taa.workforcegps.org). Those may also be helpful for State staff and partners.

Story, Christy- 1:29 PM:
@Staci- Thank you

Johnson, Staci- 1:29 PM:
@Christy you are welcome!

Nance, Alisa- 1:30 PM:
@Julie- Thank you
Herndon, Eloise- 1:31 PM:
@Warner Elizabeth, thank you

Pelletier, Judy- 1:31 PM:
@Eloise- we have also been doing RR sessions virtually and by phone for those w/ no computer access. We have multiple presenters across the state and all seem very happy so far.

Nance, Alisa- 1:31 PM:
Funding - Is it possible states can exhaust TAA funding if WIOA staff started counting services with trade funding?

Theberge, Timothy- 1:32 PM:
@Alisa - In theory, though given current enrollment levels that is unlikely.

Herndon, Eloise- 1:32 PM:
@Pelletier, Judy, thank you, proves we live in different world now!

Theberge, Timothy- 1:33 PM:
Remember, there is actually a requirement that states spend AT LEAST 5% of their funding on employment and case management services. We have states that struggle to make that minimum.

Story, Christy- 1:33 PM:
Customer flow- If you utilize different Case managers for WIOA and TAA and each Case manager does not perform an enrollment in the other program. What is your normal customer flow? WIOA refers to TRADE? if so at onset or after initial assessments? Do TAA staff begin the process and refer to WIOA staff for enrollment?

Nance, Alisa- 1:33 PM:
My WIOA co-workers and regional WDB would be very hesitant to do anything with Trade. What is the best selling point, other than saving WIOA Funds, to count services with Trade funding?

Wood, Tamara- 1:34 PM:
@Tim - WIOA requires a year of follow up after completion of services, while TAA does not. Does that mean that TAA case management funds shouldn’t pay for this?

Theberge, Timothy- 1:34 PM:
@Alisa - Performance for TAA participants co-enrolled in WIOA is higher. Performance for WIOA participants co-enrolled in TAA is higher. And it helps leverage funding.

Nance, Alisa- 1:34 PM:
Selling Point- sorry formatting mistake. What is the best selling point to get WDB and WIOA staff on board and use Trade funds?

Theberge, Timothy- 1:35 PM:
And - the best reason - our participants are owed seamless service.

Theberge, Timothy- 1:35 PM:
It's actually the LWIBs job to do so.

Theberge, Timothy- 1:35 PM:
And if they aren't doing that, they aren't even compliant with WIOA.
Theberge, Timothy- 1:35 PM:
or WIA, or arguably JTPA - maybe CETA

Theberge, Timothy- 1:36 PM:
Also - it's really no longer optional. At all.

Theberge, Timothy- 1:36 PM:
@Tamara - TAA cannot pay for follow up. WIOA can.

Saito, Sarah- 1:37 PM:
@Timothy, what does LWIB stand for? Thanks :) 

Theberge, Timothy- 1:37 PM:
@Sarah - Local Workforce Investment Board - now known as Local Workforce Development Boards

Criscuolo, Joe- 1:37 PM:
With the potential of more staff charging to TAA, is it possible the Admin cap of 10% could increase?
With every staff person charging to CM, there is some level of admin being used and gets eaten up quickly.

Theberge, Timothy- 1:38 PM:
@Joe - That's statutory. I'm not sure all those costs you're thinking of are admin.

Valencia, Alexa- 1:38 PM:
@Tim @Tamara to be clear, if non-merit staff are providing TAA case management, and therefore they are providing follow-up services, they must charge WIOA, not TAA case management?

Theberge, Timothy- 1:39 PM:
@Alexa - Correct. Follow up is not an allowable cost under TAA.

Theberge, Timothy- 1:39 PM:
So, again, depending on how you set up your time charging... the "TAA staff" could provide it, so long as that time is charged to WIOA.

Nickerson, Zach- 1:40 PM:
@Timothy - Is there any guidance, specific to WIOA, that states co-enrollment is no longer optional?

Pelletier, Judy- 1:40 PM:
@Christy - we utilize two different case managers and the flow goes both ways. We have had customers enroll in WIOA and then a petition is approved and they become enrolled Trade. We utilize the plan/assessment, etc but may add for the six criteria. We now also have some enrolled in Trade and are referring back to WIOA for coenrollment reasons as Tim has mentioned.

Wood, Tamara- 1:40 PM:
But case management done by WIOA staff prior to completion can use TAA case management funds, correct? Regardless of merit or non-merit?

Theberge, Timothy- 1:41 PM:
@Zach - Yes. The Trade Final Rule and TEGL 4-20

Theberge, Timothy- 1:42 PM:
TEGL 4-20 https://wdr.doleta.gov/directives/corr_doc.cfm?docn=6273
FOR TECHNICAL ASSISTANCE PURPOSES ONLY

Story, Christy- 1:42 PM:
@ Judy- Thank you What is your normal flow for the participant entering your Job Center after the Petition is Certified? (Using the 2 case manager model)

franklin, joan- 1:42 PM:
Confused, so WIOA staff can bill time against TAA before the petition is approved?

Theberge, Timothy- 1:42 PM:
@Joan - No.

Theberge, Timothy- 1:43 PM:
@Joan - However, both Rapid Response and appropriate career services are required when a petition is filed, through WIOA.

Theberge, Timothy- 1:43 PM:
Once a petition is certified, then those charges can be made to TAA - regardless of who is providing the services.

Pelletier, Judy- 1:44 PM:
@Christy- well that is dependent on the Center (12) and WIOA provider (3). However normally after orientation to trade we do outreach from Trade and then refer to WIOA for co enrollment. We have just started giving computer access to case managers TAA and WIOA to utilize each other’s plans, assessment, etc.

Nance, Alisa- 1:45 PM:
Billed Services Limitations - I understand MERIT staff must make trade determinations. Are there any WIOA services typical for a trade client that should NOT be billed to trade?

Story, Christy- 1:45 PM:
@Judy Thank you!

Fuglvog, Laurie- 1:46 PM:
In Alaska’s new GeoSol VOS system we coordinate with the WIOA Title I case manager and the TAA program, even if WIOA Title I has entered their services on the WIOA Title I case management area, those services must be entered again on the TAA case management area. Documents are uploaded into the system in a shared area. Enrollment forms and most applications are built into the system for each program and some are shared. The WIOA CM lets the TAA Unit know if they perform a case management service so that TAA can track them.

Theberge, Timothy- 1:47 PM:
@Alisa - Depending on your state, determination can be made by either state staff or state merit staff. As for the second part of your question, there are some things TAA cannot pay for - such as supportive services and follow up.

Nance, Alisa- 1:48 PM:
@Timothy - Makes sense. Thank you.

Pelletier, Judy- 1:48 PM:
@Laurie, We use the AJLA - JobLink system and it is similar. We have one system that both WIOA and Trade use for enrollments but need to duplicate services as it is now for each program. We are looking at revising that in the future.
FOR TECHNICAL ASSISTANCE PURPOSES ONLY

Heng, Kim- 1:50 PM:
@Staci - Success with customer flow- I am interested with your best practice; but today time is almost run out.

Story, Christy- 1:50 PM:
@Laurie, My state also uses GeoSol Vos. Do your case managers utilize the "common intake" function and complete all the program enrollments i.e. WP, WIOA, TAA or do you have separate case managers for each program? i.e. WIOA, TAA, SkillUP, etc

Wood, Tamara- 1:52 PM:
@Judy – It would be great if AJLA-JobLink could merge Measurable Skills gains as well, currently with co-enrollments, they must be entered under both TAA and WIOA enrollments.

Story, Christy- 1:52 PM:
@Tamara GeoSol Vos is the same everything is duplicated under each program..

Pelletier, Judy- 1:54 PM:
@Tamara- I agree and we will need to bring up after the deployment of rewrite. Our state along w/ others in the consortium want to explore how coenrollment could be simplified under JobLink.

Nance, Alisa- 1:55 PM:
WIOA Supportive Services - The LWDB in my area has extremely limited supportive services for trade clients - basically only transportation allowance if training is within the commuting area. Is there any possibility of DOL increasing WIOA supportive services ideas and funding to provide to the states that may trickle down to actually support more Trade clients?

Theberge, Timothy- 1:56 PM:
@Alisa - WIOA leaves the discretion of what to provide for supportive services up to the locals/states. Other states/locals have covered things like vehicle repair, eye glasses, etc.

Valencia, Alexa- 1:56 PM:
do any states use the GeoSol IEP feature?

Fuglvog, Laurie- 1:56 PM:
Hello Christy, I will check on that. We have an option to mark if you are working with a partner program. Thanks.

Nance, Alisa- 1:56 PM:
@Valencia - MO uses GeoSol IEP feature.

Grant, Kelli- 1:57 PM:
@everyone, I just want to put this out there before we wrap up...if anyone has any coenrollment best practices in your states or state policies that work well, can you send them our way here in SC?

Valencia, Alexa- 1:57 PM:
we want to use it specifically for our training plans, but there can only be one IEP open per participant, across all programs. I'm not sure if this will be confusing.

Theberge, Timothy- 1:57 PM:
As a reminder, you can - and should - post your resources right here on GPS at our Community page.

Theberge, Timothy- 1:58 PM:
With that - it's time to wrap things up for today.

https://taa.workforcegps.org
Includes minor edits for spelling, formatting, etc. No substantive additions or deletions have been made.
Grant, Kelli - 1:58 PM:
@Tim, even better!!!

Theberge, Timothy - 1:58 PM:
Thank you all for joining us. We hope these chats are helpful. They provide us some great insight to what issues you are dealing with and what topics you need to hear from us and your peers on.

Story, Christy - 1:58 PM:
@ Alexa the GeoSol Vos IEP can be utilized across programs, each case manager enters the goals and objectives within the single Employment Plan

Theberge, Timothy - 1:58 PM:
Our next event is a webinar – Quality Petition Filing for Trade Adjustment Assistance (TAA) Program – on November 9th. And, as always, make sure to check out the resources and other items available at https://taa.workforcegps.org

Theberge, Timothy - 1:58 PM:
The transcript of this session will be made available in the next day or two.

Criscuolo, Joe - 1:58 PM:
Thanks, Tim!

Nance, Alisa - 1:58 PM:
Thank you!

worden, susan - 1:58 PM:
@Kelli - we are sensitive that co-enrollment is a huge challenge and will be dedicating multiple technical assistance events to that theme

Theberge, Timothy - 1:58 PM:
I'll leave the session up for a few more minutes so you can finish your conversations.

Marquez Rios, Mayra - 1:58 PM:
Very helpful All, did not have questions but the input from everybody was great!

Graham, Lori - 1:58 PM:
Thank you!

Waters, Jhansi - 1:58 PM:
Thank you

Heng, Kim - 1:59 PM:
@Alexa- RI also uses GeoSol IEP.

Pratt, Melissa - 1:59 PM:
Thank you!

Grant, Kelli - 1:59 PM:
@Susan, thank you! All resources and assistance will be greatly appreciated!

Lefterov, Aneta - 1:59 PM:
Thank you, it was very informative.
Stankiewicz, Frances- 1:59 PM:
@timothy -yah, we have to avoid DUPLICATIVE services, including paying for a car twice LOL :-)

Grant, Kelli- 1:59 PM:
Thanks everyone, great chat as always!

Story, Christy- 2:00 PM:
Thank you everyone

Hardy, Frances- 2:00 PM:
Thank you

Bouchard, Joyce- 2:00 PM:
Thanks!

Theberge, Timothy- 2:00 PM:
Remember to contact your Regional Office. They can work with OTAA to get you the technical assistance you need.

Dukes, Camea- 2:00 PM:
Thank you

Theberge, Timothy- 2:00 PM:
Please see our events page for the next sessions

Theberge, Timothy- 2:00 PM:
https://taa.workforcegps.org/events

Theberge, Timothy- 2:01 PM:
Our next chat is on November 18 and will cover Suitable Employment

Jones-Davis, LaNetta- 2:01 PM:
Thanks

Heng, Kim- 2:01 PM:
Thank you

Nance, Alisa- 2:02 PM:
@Valencia - IEP. The IEP printed from GeoSol is difficult to read when more info is added. It also limits characters. My clients read the IEP in Word and then sign the GeoSol printed version. There can be different Goals and Objectives showing when a client receives WIOA and then Trade training. To make the printed version easier to read, suggest clearly indicating revised material.

[END TRANSCRIPT]