**WorkforceGPS**

**Transcript of Webinar**

**TAA PIRL Revisions 2021**

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GRACE MCCALL: Welcome, everyone, to today's webinar, and I'm going to turn things over to your moderator today, Robert Hoekstra. He's a program analyst with the Office of Trade Adjustment Assistance. Robert, take it away.

ROBERT HOEKSTRA: Thank you very much. Welcome, everyone. Today, we're obviously talking about the PIRL changes for the TAA PIRL. We're going to jump into a variety of the changes.

As noted, there are – there is a web link that includes WorkforceGPS page that has some red line edit versions and things like that. So, if you're looking for a chart of all the various changes and things like that, that's a good place to start. But we're going to go through all of these changes and talk about what's going on.

I am going to say this is specific to trade, although there is going to be, obviously, a lot of overlap with some other programs like WIOA. So, we're not going through all the changes affecting some of those other programs, but we are going through everything that affects TAA.

All right. So, I'm going to start this off with a quick poll question, if you guys could fill out the poll really quick just so I know where people are kind of at in terms of looking at these PIRL changes.

Giving one more minute on the poll. All right. Looks pretty well stabilizing. So, it's great. It looks like about half of you are just got the materials and are just starting to look at it. So, I'm a little disappointed that no one's just here to listen to me. But other than that, that looks great. All right. Thank you very much.

All right. So, today's plan, we're going to talk a little bit about the implementation timeline. So, for those of you who are like, what PIRL changes, you don't have to worry about it urgently, where this is actually giving a fairly decent head start on the PIRL changes. We'll talk about that.

We're going to talk about kind of the minor-ish changes and knock those out, the things that are not major adjustments to how you do your reporting. We'll jump into our language changes and then spend a little time on some specific circumstances like distance/virtual/online, multiple petitions, and some miscellaneous other changes.

And it's an open chat. So, feel free to throw questions in there, and I will get them – to them as we go.

All right. So, let's talk about the implementation timeline. There is a TEN that I was really hoping would be released before this webinar – it did not. I'm hoping this week – that is going to outline the PIRL changes timelines for all the various programs.

So, the first thing to note is that this is based on a revised version of the PIRL collection that the ICR closed for this in June, June 7th. This is why we're referring to it as a 2021 PIRL changes because that's when the official allowance for us to make the collection changes occurred.

However, for most state programs, including TAA and all the WIOA programs, they are implementing on July 1st, 2022. So, what that means is you guys have about 10 months now to get all sorted, and then the very first time you'll report it is September 30th, 2022.

Almost all discretionary programs are actually going earlier, and that's part of the reason why we're also referring to it as 2021 changes is because there's a number of programs that weren't reporting through WIPS, and these were changes that were essential to getting those programs on the WIPS. So, you'll see some discretionary programs are rolling out right now.

The one caveat I'm going to put on this is apprenticeship. Apprenticeship is obviously both a discretionary program and a state program. They are implementing right now, which means that their first quarter of reporting will close in 23 days.

If you are joint reporting with apprenticeship, we probably should have an offline conversation. But the long and short is that all of the elements will support apprenticeship reporting under the new format, and you can go ahead and report your apprenticeship under that – the new format without causing any problems. But if you are doing joint reporting with apprenticeship, I would love to have a conversation with you.

All right. Any questions on that timeline before we move on?

All right. So, we're going to jump into some of the minor ones and knock them out early. So, there's a list of ones that are no longer being reported for TAA. They actually are not being reported for WIOA either, and this is your pretest/post-test scores.

There were some debates about how to change this, et cetera, and the long and short is we said, we actually get all the information we need for generating MSG without this. And so, rather than having you have the burden of having to report this to us every time, we are unchecking it. It still does apply to some other discretionary programs, but for TAA and WIOA programs we are unchecking this and you don't have to report it to us anymore. And this is an attempt to reduce burden.

If you have any questions or really feel like reporting it to us, as you know, the full files still have these elements. You are welcome to throw them in there, but it's certainly not required.

All right. We are adding a couple, and so there's a couple of established elements. And as you guys know, we are strongly pushing integrated reporting with the various WIOA programs, in particular dislocated worker. These are all collected under those programs. We are checking in PIRL, i.e., it is now required for TAA four new elements – or four elements that were already there.

First is date of first basic career reporting. Second is date of first basic career service staff assisted, and then you see most recent date individualized career service and most recent date of supportive services. These are obviously to improve our tracking of those co-enrollment services, something that's come up significantly under the new rule and under our TAADI measures.

So, we are collecting these in order to better understand when services are being provided under co-enrollment programs. So, these are not something that normally a TAA only participant would be, but you'd be getting them through your WIOA reporting.

All right. And then I think the last minor update is on occupational skills code. We are making a couple of changes that are not – if you've been following our technical assistance, these won't be any surprises to you.

The first one is that your occupational skills training code should be documenting the occupational goal of the training, not what that individual training is for. It should be – we have taken away not available or unknown. As you guys know, that is in terms of the language. As you guys know, you should know what you're training them for. So, that should be in there.

We are requiring six digits, and we are requiring you use an updated taxonomy, the 2019 with database version 25.1 or later. So, if you've got really old occupational codes in your system, now is the time to look at updating those so that you're reporting on the correct versions.

I will say that those code versions will only be enforced for new trainings coming in after that date. So, you don't have to go back for people who have exited two years ago and backfill updated codes. It's only being enforced for ones going forward, but you do want to get in there and start updating those codes so that you have up-to-date O\*NET codes.

As you guys know, we also track this for some occupational outcomes in 1610 and 1612. That one, obviously, is only – (inaudible) – because that's not necessarily known, whereas training, hopefully you know why you're putting them into training.

All right. That should be all of our really minor updates. Any questions on the removed, the added, or those occupational training code updates?

So, there is a question about what date the occupational training code updates need to be in. It's for any training starting after 7/1/2022 because that is the implementation date for TAA and WIOA. So, any new trainings after that date need the appropriate occupational training code of the new version.

All right. So, we're going to jump into a couple of language updates for trade. These are all trade-specific elements. For the most part, these things do not fundamentally change how you should have been reporting, if you've been following our technical assistance documentation. But we are trying to align a lot of these a little bit better with the actual requirements and what we've been messaging out.

So, you guys will see some differences in terms of better consistency in the PIRL language with some of the other things we've been – guidance and stuff we have out there.

So, the first one is case management. PIRL 1322 has been renamed, and now it now says reemployment service. It's super exciting that way. The only reason for this change is because it better aligns with our statutory language. It makes no difference in reporting. So, if you're reporting it currently the right way, you should still be just fine. You don't have to actually make any PIRL changes. Just know that we did rename it to make it line up with the statute.

All right. On expenditures, there have been a couple of PIRL elements that were updated to include expenditures, but most of them still had that old language that we had back from 2009, tapper paid. Now, there is guidance out there, for example, 1821. There is 1820. I apologize.

1820 that says that these need to be reported in accrued expenditures. That's actually not a new policy. That's been true for years, but we finally updated the PIRL language to line up and make it very explicit that it's accrued expenditures. So, all these – (inaudible) – paid to expenditures accrued, and that should be no difference in your reporting as long as you were following prior guidance.

All right. So, we have a couple of elements that had been confusing for a long time that were talking about in this quarter. And that reference kind of was – (inaudible) – ourselves. And we had provided technical assistance that these should be on/off flag.

So, for example, on training part – or part-time training, if you received part-time training, it becomes a one. It shouldn't turn back off once you are no longer in part-time training. The idea is, has always been and just was poorly written, that once someone's done with their in-hire participation, we should be able to count those who receive part-time training at some point.

So, we have clarified the language. This may be a change for some of you because that has been buried in some of our technical assistance. But for the most part, it's just make all of these are straight on, and once it's on, it stays on forever. And so, that applies to both part-time training and to our overpayment flag for ARTAA. That also aligns with the TEGL. For the rest of the participation, once you get a one, you should be reporting a one the rest – (inaudible).

All right. Any questions on those before we move on to some specific topics?

All right. Now, we get to move into the fun/messy ones. So, there are some brand-new – there's a brand-new element and a modified element in distance/virtual/online training. We have renamed what used to be a trade only element for distance learning.

So, as you guys know, back in time, we've always reported distance as – so that we know which participants are receiving training through distance learning. That's actually part of our statute.

In this relatively new era, we have realized that we probably want both more granular reporting to know if it's all online or just some of it's online. And also, all the other programs got interested in it.

So, this is going to be rolled out to all the other programs. It's not a huge change for trade because we already had this element, although we do need to start tracking the difference between online and a mix of online. So, instead of just a one, there was some distance at some point, it's either a one if it was provided as virtual or online and a two if they received it – received part. So, they got some in-person, some virtual and online.

Virtual and online means anything not in-person. So, if they are attending any kind of training that is provided through those online means, they should be marked as virtual/online.

Now, once again, this tracking – and I know you've got to modify some systems because you do have to be able to differentiate between partially online and fully online. This is only required, again, for training implemented after 7/1/2022. We are happy to get that coding, starting with this quarter going forward. So, if you get it done early, feel free to turn it on, but you do not need to do it until 7/1/2022.

All right. I'm waiting for just a sec to see if there's any questions on that. I know that's a little confusing.

Yeah. So, the definition of distance learning we don't have – so, it's obviously now virtual/online, not distance, and it is any kind of training service that is provided not face to face. So, you're not physically sitting in a classroom. If it's – it doesn't matter if it's synchronous or asynchronous. It doesn't matter if it's through a – their own web platform or they had a Zoom that they receive that training through. Yeah. Great.

All right. Corresponding with this, there is an interest in finding out whether we're providing other services, in particular your career services, in a distance online format as well. We have created a new Element 3004 that is required for TAA, WIOA, and a bunch of other programs that is tracking the same thing.

Now, the big caveat here is that it is the actual provision of the services. So, for example, if you call someone and say, why don't you come in next week, that is not you providing those services over a phone. That is you asking them to come in. So, it's only when you actually are providing individualized services other than training and that.

I'll also say you notice the language here is very broad when it says individualized services other than training. This covers both WIOA individualized services and TAA case management services and any other services that are individualized services from any other program.

It is intentionally not supposed to be program specific, even though some of those – some of those services we track in other places as program specific. So, we have that in mind. You could, for example, have someone who's co-enrolled between dislocated worker and TAA. They received their TAA case management virtually, but they actually went in to talk with the dislocated worker staff person. And you would be marking them in this case as a mix of online and in person because they received some services in both formats.

So, there's a great question about whether a rapid response – a virtual rapid response would be an example of this. Remember, this is specific to individualized services. So, most rapid response are not provided at an individualized – as an individualized service. If it were, it could count here, but that's very rare. So, for the most part, a rapid response is a group something, and it would not count for this element.

And there is a great comment here about you probably in your systems will be tracking this per service; right? So, it might be WIOA dislocated worker, individualized staff assisted services that will be marked online or virtual or in-person. And you might have the same thing for case management, and what you're reporting to us in the PIRL is the aggregation across all of those.

So, you are right. On your end, you will probably end up tracking this separately for the different kinds of services. That's not a requirement, obviously. We only require what you report to us, but that's probably what most states will do.

There's a question about what case management services encompass. There is not a TEGL guidance because it is spelled out in the statute, although it is in the operating instructions for 2015. It is at Section 238 of the TAA statute. It lists out the eight specific services that apply to TAA. Those, however, are TAA funded services.

So, you are never going to get a service that provides both WIOA Title I individual services and TAA because they are funded by two completely different groups or two completely different statutes. Great question, though. Like I said, that is listed out in Section 238 of the statute, and you can see it in the operating instructions for 2015.

I'm watching people start asking questions. I'm waiting for just a minute to see if any other questions come in before I move on. All right. I'll come back if there's other questions.

So, we're going to talk a little bit about multiple petitions. This is going to be one of the biggest changes for trade. As you guys know, previously, we were leveraging an element as a flag, PIRL 935 using the exit status. We're doing away with that. We don't otherwise use that element. So, we're just getting rid of it.

Instead, we are modifying our petition number element. So, right now, it takes up to nine digits where you should be using the numeric portion of the TAW number, followed by any suffix letters. So, for example, 91000A would be 9-1-0-0-0-A, if that is the petition they're being served under.

The vast majority of your participants are only served under one petition number, and that is how it's still going to look under the new format. There has been some questions about the length, and I'll get to that in a minute. But what we are asking under the new PIRL to be implemented next year is that we get a Pipe delimited list of all the petition numbers that they were served under, and they should be in order 1st, 2nd, 3rd.

If you have more than three, it does specify that it should be first, second, and last. I have never heard of the state having someone served under a more than three. So, I'm hoping that's never the case, but that specification is there.

The reason why – the reason why we have such a long link is because, as you guys know, we are getting increasingly close to rolling over in the petition number into six digits. We are currently in the 98,000 series. We are expecting, especially if we are reauthorized, to have another petition number bump. We're looking not that far out before your systems need to support a full nine-digit numeric TAW number plus suffix letters.

Suffix letters currently have only been up to two digits. We could hypothetically see three coming in, which is why we have enough space for a full six-digit numeric, three-digit suffix, and Piped deliminations for three petition numbers. We fully expect very few people are going to actually need anything remotely close to that size, but it allows for it just in case that does come up. The vast majority of participants are served under only one petition.

Right now, those are five digits, and they – and most do not actually include a suffix letter. So, most of your participants are still only going to have five-digit length. But, yeah.

We did update – – (inaudible) – to confirm for me. We did update the frequently asked questions or, if we haven't yet, we will shortly with a nice new diagram of how to report this. And we are also asking a different – a change in how you report your petition number or the other services tied to your petition number.

So, previously, that quarter of transition, we just – we said we still want to get what's under the old petition, and then next quarter you can switch over. We're doing away with that. As soon as they're served under a new petition, you give us the new petition on the left, and you give us information in the record based on that new petition. So, there's no longer one-quarter delay.

And there will definitely be a frequent asked question on there that will go into that in some details. But the long and short is, as soon as they switch over to a new position, all the TAA specific elements should be updated to reflect services provided under that new petition, and petition numbers should get that additional value in its list.

All right. I know that's probably confusing for a number of people, but I'm here for questions.

I do see a question about Element 1004. Element 1004, which is the date of most recent career service, includes both basic and individualized career services but is WIOA specific. There are no plans to update that. That is something tracking specific for WIOA to meet WIOA statutory requirements. It should be basically the later – or the – yeah – the later of most recent basic career service and most recent individualized career service. And that is going to stay the same. Yeah. Good question, though.

All right. I've been informed that the FAQ isn't posted yet, but I will probably post that today or the revised multiple petition number FAQ.

All right. Any other questions on multiple petitions?

All right. So, as I was talking about, we're no longer implementing a one-quarter delay. Here is the difference in the graphic that we're going to include on the mobile petition number FAQ.

So, under the old version, we had the 935 element that we flagged in one quarter. That's done away with. And you notice how it used to be that we would only report B services the quarter after transition. We're moving that up to be the quarter of transition. This actually makes it a lot cleaner for you guys, I think, because you have to do a lot of weird handling in order to get to report the old services once you switch over. So, hopefully it'll be easier on everybody's part.

All right. So, we're going to jump into a couple of other miscellaneous changes. First one is RESEA now focuses on staff-assisted services. Part of the reason I'm flagging this is not only because it is a TAA element that's being collected, but there is an increased focus on RESEA integration. You guys will probably see some technical assistance coming out around RESEA. So, this is an element we're going to be looking at a lot more.

The only change in the PIRL, though, is that it does specifically look at staff-assisted services for RESEA.

All right. Rapid response event number. We are adding an extra digit. Essentially, we had one state where they ran out of suffix letters. So, if you guys recall, the rapid response event number is a 12-digit number. It includes a state. It includes the postal code. It includes an event sequence, which program year, and then the last digit of it was a suffix letter. So, if you had multiple actual times you met with people for an individual event, then it would – you would get a letter for each one of those.

We had some states, especially now that we're providing all of these things online where it's easier to do multiple repeated events, that have provided more than 26. So, we are just adding an extra digit. You do not have to include that extra digit unless there are more than 26. So, if they're – if you're on your third one, it'll still be C. It's only once you get to 27 that you roll over and get that extra digit.

Now, I will say about half of states do report rapid response to that number, but it is still optional. So, if you aren't reporting rapid response event number, that's still fine. But we do want to – for those states that can do it, we love having that information. So, keep up the good work.

All right. Received training. There is a new clarification on received training that is as defined by program specific guidance. This is a clarification mostly for education programs on training versus education. This doesn't have any meaningful change for TAA or really WIOA. The – and it's still edit-checked with enter training date one.

So, if you report entered training date one, you should say they received training. If you did not report that, you should not. So, it's only for some other strange programs that this makes any difference whatsoever.

Post-secondary education. Clarification to report zero if the program does not lead to credential or degree versus a blank. That way we know that it's an intentional zero and not just missing. Otherwise, that one seems pretty straightforward.

And then we clarified that post-exit means, and we added the phrase after exit. So, that should just be a fairly clear change. You also notice that we – (inaudible) – attended or enrolled, and we say enrolled or attended now. That shouldn't really make any meaningful difference to your reporting. It's just making sure that everyone's on the same page about exactly what's going on in that moment, though I do see a comment being added.

We – so, the other change that you'll see is that wages and earnings, wages have been renamed to earnings. As you guys know, this should include non-earning – or non-wage earnings. This really shouldn't be any meaningful change for you. It does, however, note that we did expand how many digits we take. We are now adding a ninth digit.

So, for those of you who have systems that are capping out and can't report millions, we actually want those millions now. So, feel free to add your extra digit and report that. But what you're reporting isn't fundamentally changing otherwise.

Michael, I see your question. I'll get back to that in a minute.

Enrolled leading to credential or employment. There is some rewrite of the language here. They now include secondary credentials, and we added apprenticeship in – on 1811. So, bear that in mind. It does now include secondary credential attainment. That's going to be hopefully minor programing change, but it does affect this element and when we collect it. So, bear that one in mind.

All right. So, I'm going to take any questions now. I'm going to start off with Michael's.

You're absolutely right. The rapid response event number talks about at some point DOL is going to actually create a network for signing these. We don't do that. We haven't done that. And they're – the plans to do that are very amorphous at the point – at the current point, which is why it is a optional only element currently.

You'll probably hear different stories from different parts of DOL on exactly how much we really want to do that. So, that is not currently occurring, but please assign your event numbers, if you can. It is, however, an optional element because of that. Good question.

So, I know that was relatively quick. I'm happy to go back to any parts of it. Like I said, there are some elements that are changing that are specific outside of TAA. So, if you are doing joint reporting, make sure your reporting folks go back through that link to the red line edits is really critically helpful so you can see all the various differences being implemented.

The PIRL – or the petition number is kind of like the really big one that's new and goofy for trade. And, obviously, the distance online is going to – (inaudible).

While I'm waiting for questions, here's the link to the ICR implementation resources. There is a TEN coming soon. That TEN, like I said, I was hoping it would be out for this. It is not. I'm hoping it will come out this week. It just give timelines for implementation for everything. As you guys know, TAA and WIOA are implementing 7/1/2022.

The only other note is it's very likely that TEN is going to – we've talked a little bit on the AMAs about changing the reporting deadline from taking into account weekends and holidays and 45 days after to be a fixed 15th day of the month, just like the 9130s are. That will probably be in that TEN as well. So, just when that comes out, take a look at that, but it also is going to slightly tweak the PIRL reporting deadline.

Great question from David about whether TAADI will be affected by any of this. This does not meaningfully affect any of our TAADI measures. So, the current plan is no. Now, as you guys know, each year annually, we do revisit our TAADI measures and see what changes we need to make. There are some elements here that we have talked about for some future TAADI round, but obviously would not be implemented for this coming fiscal year, since we won't have data on them until at least the year after.

So, for example, there's been a lot of discussions around RESEA. Depending on where things come out, distance online or online virtual reporting, there will definitely be a place, we'll do some analysis and see if there's anything that needs to happen, but that's probably a ways down the road.

Yeah. So, I'm going to go back to RESEA. So, the only element on RESEA is one reporting element in 401. This is basically just saying, were they referred to RESEA or not, and also has WPRS as well.

As you guys know, there is a big push to do RESEA predominantly, and there are a lot more funds available for that. This is the one point of clear integration between the two. We're looking at – because there is some reporting of this under not within PIRL. They report some aggregate measures. So, we're looking at cross-walking our data between our PIRL and some of those other reports to kind of see where things shake out.

I say that in terms of a – our curiosity. There is no perfect alignment and the likelihood that that becomes another crosswalk TAADI measure is extremely, extremely low. But yes. The idea is we do just want to know when people are coming and getting those RESEA services. If they are getting those, obviously, this needs to be reported one way or the other. So, they may be a – not be referred, but they may still be a claimant or an exhaustee. So, you do need to be able to report that. Yeah.

Are there any specific questions on that? And great comment from Susan Manikowski that, since there are new elements, there will be a new version of the TAADI self-check posted when we go live on the new formats so that it won't really change the calculations, but obviously, we'll make sure that you can paste into your new files just fine.

All right. And wait for just another minute to see if there's any other questions or comments.

And take this minute just to remind everyone, please make sure your systems can handle a six-digit petition number. As I said, we will definitely jump this. There's a reauthorization. We'll try and minimize that jump to give you guys as much time as possible, but we're quickly running out of space.

This is recorded. It will be posted within a few days, probably, and it can be shared around as well.

All right. Well, unless there's any other questions, feel free to reach out to us, either me and/or Susan and your regional coordinator. Our emails are there, and thank you very much.

(END)