



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY
LANSING

JEFF DONOFRIO
DIRECTOR

**OFFICIAL
Policy Issuance (PI): 19-35**

Date: December 5, 2019

To: Michigan Works! Agency (MWA) Directors

From: Krista Johnson, Division Administrator **SIGNED**
Talent Development Division
Workforce Development

Subject: Trade Adjustment Assistance (TAA) Appropriation Year (AY) 2018/Fiscal Year (FY) 2020 Allocations for the Time Period of October 1, 2019 through September 30, 2020, TAA Plan, and Merit Staff Certification for FY 2020

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: None

References:

- Trade Act of 1974, Public Law (PL) 93-618, as amended
- Trade Act of 2002, PL 107-210
- TGAAA of 2009, PL 111-520
- TAAEA of 2011, PL 112-40
- TAARA of 2015, PL 114-27

United States Department of Labor Training and Employment Guidance Letters (TEGLs) 11-02 and subsequent changes, 22-08 and subsequent changes, 10-11 and subsequent changes, 07-13, and 05-15

PI: 19-30, issued October 25, 2019

PI: 10-21, issued January 26, 2011

TAA Comprehensive Manual, modified May 10, 2019

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

Policy: This policy provides MWAs with administrative and fiscal requirements, guidance, and funding allocations for implementation of the TAA Program during AY18/FY20.

TAA Program Funds

The AY18/FY20 Program Funds allocated to MWAs in this policy must be used to support the following TAA services (and allowable additional benefits and materials that accompany such services):

- Classroom Training.
- On-the-Job Training.
- Customized Training.
- Registered Apprenticeship Training.
- Job Search Allowances.
- Relocation Allowances.

Examples of additional benefits and materials that may accompany these services include (but are not limited to):

- Supplies, tools, equipment, technology devices, or services etc., deemed “highly encouraged,” “imperative,” or otherwise without the purchase of necessary materials for a TAA approved training program, would hinder the success of the training participant. ¹
- Travel and/or subsistence costs.
- Books.

¹The purchase of additional training materials need not be “required,” however, supporting justification from the training provider is required to be included in the participant file.

- Education and school supplies.
- Course and assessment fees.

TAA Local Administration Funds

The AY18/FY20 TAA Local Administration Funds allocated to MWAs in this policy are limited to up to five (5) percent of total AY18/FY20 TAA Program Funding expenditures. The AY18/FY20 TAA Case Management expenditures cannot be considered in the calculation of the TAA Local Administration Funding limitation.

TAA Local Administration Funds must be used to support the administration and operation of the TAA Program, which includes the following activities (but not limited to):

- Salaries and benefits for staff who provide:
 - TAA program services.
 - TAA program oversight.
 - TAA monitoring of program operations.
 - Outreach and education to TAA-certified employers and TAA-eligible workers.
 - The collection, validation, and reporting of TAA data.
- Supplies, equipment, travel, postage, utilities, rental, and maintenance of office space related to the administration of the TAA program.
- Administrative activities for 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 Service Center (local coordination).

TAA Case Management Funds

The AY18/FY20 TAA Case Management Funds allocated to MWAs in this policy must be used to support Employment and Case Management services. Employment and Case Management services are required to be offered and made available to adversely affected workers and adversely affected incumbent workers eligible under TGAAA of 2009, TAAEA of 2011, and TAARA of 2015.

The AY18/FY20 TAA Case Management Funds cannot be used to support activities for adversely affected workers eligible for TAA of 2002 benefits.

Note: TEGL 5-15 requires states to use at least five (5) percent of fiscal year funds to provide Employment and Case Management services.

In an effort to maximize TAA Employment and Case Management benefits, MWAs are encouraged to develop innovative practices to utilize AY18/FY20 Case Management Funds to the fullest extent, but proportionate and reasonable to the number of adversely affected workers served.

The AY18/FY20 Employment and Case Management funds allocated to MWAs in this policy must be used to support the following eight Employment and Case Management services (and allowable additional benefits that accompany the services):

- Comprehensive assessments.
- Individual Service Strategies.
- Training information.
- Financial aid information.
- Employability skills assistance.
- Career counseling.
- Labor market information.
- Supportive service information.

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

- TAA worker notification efforts.
 - Social Media advertisements.
 - Billboards.
 - Radio announcements.
- TAA marketing materials.
- TAA promotional and/or informational videos.
- Activities engaged in efforts to increase Employer-Based Training.
- Maintenance and enhancement of electronic case management systems to improve case management services.
- Upgrade of Information Technology equipment.
- Specialized assessments for individual participants.
- Staff time spent:
 - Conducting TAA program monitoring/auditing.
 - Participant data-entry into the One-Stop Management Information System (OSMIS), including entry of case notes.
 - Benchmarking.
 - The development and tracking of training plans.

- The removal of employment barriers.
- Issuance, continuation, extension, and revocation of waivers from training.
- Follow-up services and outcomes.
- Skills transferability analysis.
- Peer counselors.
- Costs associated with TAA program training of TAA staff, including activities and services available to TAA participants.
- Rent and utilities for the support of TAA staff.
- One-Stop infrastructure costs (as part of the MWA's current cost allocation plan).
- Business Service activities that contribute to the employment of TAA customers.

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

Funding Allocations

The funding allocation factors used to determine the MWA awards considers a 33.3 percent weighted average on TAA participants for the previous four quarters, a 33.3 percent weighted average on TAA participants in training for the last four quarters, and 33.3 percent of total TAA expenditures from the previous fiscal year. Case Management funding awards in this policy were determined by calculating 35 percent of the AY18/FY20 total allocation.

The AY18/FY20 TAA Allocations Table is included in this policy.

Fiscal Policies and Procedures

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

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

The 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 for funds provided through this grant must be reported to the Michigan Department of Labor and Economic Opportunity-Workforce Development (LEO-WD) on a quarterly basis. A final closeout report is also due. All quarterly financial expenditure reports are due

to the WD no later than the 20th calendar day after the end of the fiscal quarter. The final close-out report is due to the WD 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. Please submit reports via the [MARS](#). Questions related to the MARS should be directed to Marilyn Carey at 517-241-6742.

In the MARS, AY18/FY20 TAA expenditures shall be reported under:

Grant – AY18 Trade Adjustment Assistance

Project – Trade

Note: Specific cost categories include Local Administration, Case Management, Training, Job Search Allowances, and Relocation Allowances.

In addition to the quarterly reporting of fiscal expenditures in the MARS, the MWA is required to enter all individual TAA Training, Job Search, and Relocation Allowance costs into the OSMIS. It is advised such expenditures be entered into the MARS and the OSMIS concurrently to maintain accurate fiscal reporting.

The MWAs may request additional TAA Funds by contacting Ms. Jimelle Blakley, Administrative Manager, by email at blakleyj1@michigan.gov or by telephone at 517-241-8340.

Please refer to the Procurement PI: 19-30, issued October 25, 2019, or any policy replacing PI 19-30, for further information regarding profit and corresponding limitations.

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

TAA Merit Staff Requirement

All service provider staff funded by TAA must be merit-staffed employees of eligible local governments that follow a merit system of personnel administration in accordance with 5 Code of Federal Regulation 900.603. To prove verification of merit-staff employees, Attachment C provides certification of merit staff for TAA service providers. Please refer to PI 10-21, issued January 26, 2011, for TAA Merit Staff requirements.

MWA Direct Delivery of TAA Services

A local MWA may submit, through the TAA Plan (Attachment B), a plan to deliver TAA services if it is determined there is value and cost savings when providing direct delivery of these services. This plan does not relieve a MWA from the Merit Staff requirement previously described. If the MWA

requests to convert to self-delivery during the fiscal year, a change to the TAA Plan narrative must be submitted by email to TED-TSDIV@michigan.gov.

To direct deliver TAA services, the MWA must include the TAA staffing plan, including the number of program manager(s) and case manager(s), and a description of the value and cost savings of providing direct delivery of TAA services.

Action: Local areas are required to submit the following documents within 30 calendar days from the issuance date of this policy: Budget Information Summary (Attachment A), response to the local TAA Plan (Attachment B), and the Merit Staff Certification (Attachment C). These required documents should be sent via email to TED-TSDIV@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 PI 19-01. The Approval Request Forms must be submitted within 30 calendar days from the issue date of this policy to:

Michigan Department of Labor and Economic Opportunity
Workforce Development
Talent Development Division
Ms. Carla Burdick, Executive Secretary
201 North Washington Square, 4th Floor
Lansing, Michigan 48933

WD will not accept documents prior to the official date of the policy.

Inquiries: Questions regarding this policy issuance should be directed to your TAA State Coordinator.

This policy issuance is available for download from the [WD's website](#).

WD is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Please contact Ms. Carla Burdick by telephone at 517-241-9852 or by email at BurdickC@michigan.gov for details.

WD is funded by State and Federal funds; more details are available on the Legal Disclaimer page at www.michigan.gov/WDA.

Expiration

Date: September 30, 2020

KJ:TG:cjb
Attachments

**Trade Adjustment Assistance (TAA)
Approval Request Form Instructions**

Identifying Information

1. Michigan Works! Agency (MWA) Name and Number: Enter the name and number of the MWA.
2. Plan Title(s): Enter the appropriate plan or program title. "TAA Program" has been pre-printed.
3. Policy Issuance Number: Enter the appropriate Policy Issuance number. "19-35" has been pre-printed.
4. Plan Period: Identify the plan's time period covered. "10/01/2019 - 09/30/2020" has been pre-printed.

Approval Request Form

1. Michigan Works! Agency (MWA) Name and Number:
2. Plan Title(s): AY18/FY20 TAA Program
3. Policy Issuance Number: 19-35
4. Plan Period: 10/01/2019 – 09/30/2020

The Chief Elected Official(s) and Workforce Development Board hereby request approval of this document. Please insert the printed name for each signature provided below.

Signature of Authorized Chief Elected Official	Date:
Printed Name:	
Signature of Authorized Chief Elected Official	Date:
Printed Name:	
Signature of Authorized Chief Elected Official	Date:
Printed Name:	
Signature of Workforce Development Board Chairperson	Date:
Printed Name:	

WD, 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)
Budget Information Summary (BIS) Instructions**

Section I - Identification Information

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

Policy Issuance Number: Enter the Policy Issuance number applicable for the BIS. "19-35" has been pre-printed.

Grant Name: Enter the name of the grant associated with the funding being awarded. "AY18 Trade Adjustment Assistance" has been pre-printed.

Project Name: Enter the name of the project associated with the funding being awarded. "Trade" has been pre-printed.

Plan Period: Enter the start and end dates of the plan period. "10/01/2019 - 09/30/20" has been pre-printed.

Catalog of Federal Domestic Assistance (CFDA) Number: Enter the appropriate CFDA number for the funding being awarded. "17.245" has been pre-printed.

Section II - Total Funds Available

Program Award: Enter the amount of the program allocation.

Administrative Funds: Enter the amount of allocation planned for administration. The MWAs may not expend more than five percent of total expenditures on administrative activities.

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

Total Funds Available: Enter the total sum of Program Funds, Case Management Funds, and Administrative Funds.

Section III - Current Appropriation Year (AY) Planned Expenditures by Cost Category

Job Search Allowances: Enter amount of allocation planned for Job Search Allowance activities.

Relocation Allowances: Enter amount of allocation planned for Relocation Allowance activities.

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

Total Planned Program Expenditures: Enter the total of Job Search, Relocation, and Training Award.

The Budget Information Summary (19-XX_BIS_AY18_TAA) can be found as an attachment to this email.

**Trade Adjustment Assistance Allocations
Appropriation Year 2018/Fiscal Year 2020**

Michigan Works! Agency	Program Award (Job Search, Relocation, Training)	Administrative Funds*	Case Management Award	Total Funding**
West Michigan Works!	1,220,514	61,025	690,060	1,971,599
Berrien/Cass/Van Buren	180,324	9,016	101,952	291,292
Capital Area	225,783	11,289	127,653	364,725
DESC	1,033,364	51,668	584,248	1,669,280
Great Lakes Bay	1,170,369	58,518	661,709	1,890,596
GST Michigan Works!	144,862	7,243	81,902	234,007
Macomb/St. Clair	924,362	46,218	522,620	1,493,200
Northeast	11,183	559	6,322	18,064
Northwest	48,196	2,409	27,250	77,855
Oakland	698,240	34,912	394,774	1,127,926
Region 7B	65,065	3,253	36,787	105,105
Southeast	281,654	14,082	159,243	454,979
SEMCA	703,900	35,195	397,974	1,137,069
Southwest	269,856	13,492	152,572	435,920
UPWARD Talent Council	443,509	22,175	250,752	716,436
West Central	7,396	369	4,182	11,947
State Total	7,428,577	371,423	4,200,000	12,000,000

**TAA Administrative Funds are for set aside funds only and are limited to 5% of programmatic expenditures.*

***Funding awarded in this policy is Appropriation Year 2018/Fiscal Year 2020 funding (for expenditure October 1, 2019 through September 30, 2020.)*