



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF TALENT AND ECONOMIC DEVELOPMENT  
TALENT INVESTMENT AGENCY  
WANDA M. STOKES  
DIRECTOR

JEREMY HENDGES  
INTERIM DIRECTOR

**OFFICIAL**  
**Policy Issuance (PI): 18-43**

**Date:** December 5, 2018

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

**From:** Joe Billig, Division Administrator **SIGNED**  
Targeted Services Division  
Workforce Development Agency

**Subject:** Trade Adjustment Assistance (TAA) Fiscal Year (FY) 2019 Allocations (for expenditure October 1, 2018 through September 30, 2019), TAA Plan Narrative Instructions, and Merit Staffing Certification for FY 2019.

**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:** PI 13-15, issued September 27, 2013

**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 (U.S.) Department of Labor Training and Employment  
Guidance Letters No. 11-02 (and subsequent changes), 22-08 (and  
subsequent changes), 10-11 (and subsequent changes), 07-13, and 05-15

PI: 15-12, issued July 17, 2015

PI: 10-21, issued January 26, 2011

TAA Comprehensive Manual, issued December 29, 2016

**Background:** The 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.

**Policy:** This policy provides the administrative requirements and funding allocations for the TAA Program for FY 2019.

### **Program Funds**

The 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.

The definition of the “normal commuting area” is “that in which an individual is expected to travel to and from work or training on a daily basis.” In Michigan, upon official issuance of this policy, the normal commuting area definition has been modified to five miles one-way from the individual’s place of residence. The five-mile radius applies to travel for TAA training, Job Search Allowances, and Relocation Allowances.

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

- Supplies and equipment.
- Supplies, tools, equipment, technology devices, etc., deemed “highly encouraged,” “imperative,” or otherwise without the purchase of necessary materials would hinder the success of the participant.\*
- Travel and subsistence costs.
- Books.

- Education and school supplies.
  - Purchase of supplies including folders, paper, index cards, pens, pencils, backpacks, etc.\*\*
  - Graduation cap and gown.
- Course and assessment fees.
- Other items/services deemed necessary by the training institution for successful completion of the program.

\* The purchase of necessary materials need not be “required,” however, the justification for purchase must be documented from the training provider.

\*\* It is suggested that the MWAs determine a standard amount to include in the cost of each training plan for purchases of education and office supplies. A receipt for reimbursement of such supplies is required.

### **Administrative Funds**

Up to five 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.

The 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).

### **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 additional allowable Case Management activities are highly encouraged for the TGAAA of 2009, TAAEA of 2011, and TAARA of 2015:

- TAA worker notification efforts.
  - Facebook advertisements.
  - Billboards.
  - Radio announcements.
- Upgrade of Information Technology (IT) equipment.
- Specialized assessments for individual participants.
- TAA marketing materials.
- TAA promotional or informational videos.
- Activities engaged in efforts to increase Employer-Based Training.
- 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.
  - Issuing, continuing, extending, and revoking waivers from training.
  - 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 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 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.

### **Allocations**

The formula to determine the MWA awards considers a 33.3 percent weighted average on enrolled participants for the previous four quarters, a 33.3 percent weighted average on 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 were calculated by determining 35 percent of the total MWA Appropriation Year (AY) 2017 program award.

The FY 2019 (AY 2017) TAA Allocations Table has been 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 of the funds provided through this grant must be reported to the Michigan Talent Investment Agency/Workforce

Development Agency (TIA/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 [MARS](#). If there are any questions, please call Ms. Marilyn Carey at 517-241-6742.

In the MARS, AY 2017 TAA expenditures shall be reported under:

**Grant** – AY17 Trade Adjustment Assistance

**Project** – Trade

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

In addition to the 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 that the MARS and the OSMIS be entered concurrently to maintain accurate fiscal reporting.

The MWAs may request additional TAA funds if the MARS awards are exceeded by contacting Ms. Jimelle Blakley, TAA State Coordinator, by email at [blakleyj1@michigan.gov](mailto:blakleyj1@michigan.gov) or by telephone at 517-930-4169.

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

To maximize Workforce Innovation and Opportunity Act (WIOA) Dislocated Worker funding, the MWAs should continually evaluate the 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.

### **Merit Staffing**

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-staffed employees, Attachment A, provides Certification Regarding Merit-Based Staffing for TAA Service Providers. Please refer to PI: 10-21, issued January 26, 2011, for TAA Merit Staffing requirements.

### **MWA Direct Delivery of TAA Services**

A local MWA may submit, through the TAA Plan Narrative, a request to deliver TAA services if the MWA determines there is value and cost savings

when providing direct delivery of these services. This request does not relieve an MWA from the Merit Staffing 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](mailto:TED-TSDIV@michigan.gov).

To direct deliver TAA services, the TAA Plan Narrative must contain 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 a Budget Information Summary, a local TAA Plan Narrative, and a Merit-Based Staffing Certification within 30 calendar days from the issue date of this policy by email to [TED-TSDIV@michigan.gov](mailto:TED-TSDIV@michigan.gov).

Local areas are also required to submit one signed Plan Approval Request form, with original signatures from the Chief Elected Official(s), Workforce Development Board Chair, or their designee(s) in accordance with PI: 17-24. Plan Approval Request forms must be submitted within 30 calendar days from the issue date of this policy to:

Michigan Talent Investment Agency  
Targeted Services Division  
Ms. Pam Vance, Executive Secretary  
201 North Washington Square, 5<sup>th</sup> Floor  
Lansing, Michigan 48913

**The WDA will not accept documents prior to the official date of the policy.**

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

This policy is available for downloading from the [WDA's website](#).

The information contained in this policy will be made available in alternative format (large type, audio tape, etc.) upon request to this office. Please contact Ms. Pam Vance by telephone at 517-241-9834 or by email at [vancep1@michigan.gov](mailto:vancep1@michigan.gov).

**Expiration Date:** September 30, 2019

JB:JB:pv  
Attachment

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

**Identifying Information**

1. Michigan Works! Agency (MWA): Enter the name and number of the MWA.
2. Program Title: Enter the appropriate program title. "TAA Program" has been pre-printed.
3. Policy Issuance (PI) Number: Enter the appropriate PI number. "18-43" has been pre-printed.
4. Plan Period: Identify the plan's time period covered. "10/01/18 through 09/30/19" has been pre-printed.

## Approval Request Form

1. Michigan Works! Agency (MWA) Name and Number:
2. Plan Title(s): TAA Program
3. Policy Issuance Number: 18-43
4. Plan Period: 10/01/2018 – 9/30/2019

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:	

The Michigan Talent Investment Agency/Workforce Development Agency, 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 2019)**

**A. Michigan Works! Agency (MWA) Identification Information**

1. Identify the MWA contact person(s) (including email and phone number) for purposes of discussing the TAA plan contents.
2. Please provide the MWA contact person(s) who should receive TAA correspondence, participant inquiries, fiscal questions, and/or scheduling of TAA Programmatic Reviews. Include the name, title, email, and phone number of each individual.

**B. Service Providers**

1. List the legal name of each entity that is responsible for the delivery of TAA Services. Indicate if the MWA requests to self-deliver TAA services (see B.2)
2. If the MWA requests to self-deliver TAA Services, include the TAA staffing plan, with 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. If the MWA is not requesting to self-deliver TAA services, indicate N/A.
3. For each provider of TAA Services, list the type of entity. Choose from the following:
  - ✓ Governmental agency of the State of Michigan.
  - ✓ Local unit of government.
  - ✓ Special purpose unit of government.
  - ✓ School district.
  - ✓ Intermediate school district.
  - ✓ Public community college.
  - ✓ Public university, other.
4. For each provider of TAA Services, indicate whether they are a merit-based organization.

**C. Design and Governance**

1. How does the MWA ensure all TAA determinations are provided in writing and include access to the protest and appeal process?
2. How are business services staff members partnering with the TAA Program?

**D. TAA Services**

1. What is the MWA local policy for issuing, reviewing, extending, and revoking waivers from training?
2. Are the 30-day waiver reviews conducted and entered into the OSMIS?

3. How is the TRA Unit notified of the waiver issuance and revocations?
  - a. Does the MWA experience difficulty obtaining verification of Benchmark Reviews from the training provider? If yes, how does the MWA verify the benchmark requirements when experiencing such difficulties?
  - b. In addition to the verification of Benchmarks, what is the MWA collecting throughout the duration of training to ensure satisfactory progress and participation are being maintained?
  - c. How and when are Alternative Trade Adjustment Assistance/Reemployment Trade Adjustment Assistance participants notified of potential eligibility?

**Trade Adjustment Assistance (TAA)  
Budget Information Summary (BIS) 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. (“18-43” has been pre-printed.)

Grant Name: Enter the name of the grant associated with the funding being awarded. (“AY17 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. (“10/01/18 to 09/30/19” has been pre-printed.)

Catalog of Federal Domestic Assistance (CFDA) Numbers: 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.

Administration: 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. The MWAs were awarded 35 percent of the program award for case management activities.

Total Funding: Enter the total of Program, Case Management, and Administrative Funding.

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

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).

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

**Section IV – Limitation Percentages**

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

***The Budget Information Summary (18-43\_BIS\_AY17\_TAA) can be found as an attachment to this email.***

**Merit-Based Staffing Certification**

**Certification Regarding Merit-Based Staffing for Trade Adjustment Assistance (TAA) Service Providers**

All service provider staff funded with 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 Regulations (CFR) 900.603.

The undersigned certifies that:

- (1) The Michigan Works Agency (MWA) meets merit staffing requirements or has competitively selected and contracted with one or more eligible merit-staffed local government entities to provide TAA services.
- (2) Staff providing services are merit-staffed local government employees that are employees of local units of government, special purpose units of government, school districts, intermediate school districts, public community colleges or public colleges and universities.
- (3) The MWA maintains on file a certification from each TAA service provider. The certification must detail the provider is an eligible local unit of government and follows an established merit system of personnel administration that is in compliance with 5 CFR 900.603. The certification is to be available for review by the Talent Investment Agency, the federal Office of Personnel Management, or their authorized agents.

**MWA Official Certifying This Form**

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Name Title

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MWA

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Date

**Trade Adjustment Assistance Allocations  
Fiscal Year 2019**

<b>Michigan Works! Agency</b>	<b>Program Award (Job Search, Relocation, Training)</b>	<b>Administrative Funds*</b>	<b>Case Management Award</b>	<b>Total Funding**</b>
West Michigan Works	589,488	29,474	333,286	952,248
Berrien/Cass/Van Buren	26,979	1,348	15,254	43,581
Capital Area	57,125	2,856	32,297	92,278
DESC	736,615	36,830	416,471	1,189,916
Great Lakes Bay	933,261	46,663	527,650	1,507,574
GST Michigan Works	192,205	9,610	108,670	310,485
Macomb/St. Clair	822,739	41,136	465,164	1,329,039
Northeast	13,669	683	7,728	22,080
Northwest	34,482	1,724	19,495	55,701
Oakland	647,653	32,382	366,173	1,046,208
Region 7B	61,851	3,092	34,970	99,913
Southeast	246,591	12,329	139,418	398,338
SEMCA	509,672	25,483	288,161	823,316
Southwest	181,587	9,079	102,666	293,332
UPWARD Talent Council	482,169	24,108	272,611	778,888
West Central	35,350	1,767	19,986	57,103
<b>State Total</b>	<b>5,571,436</b>	<b>278,564</b>	<b>3,150,000</b>	<b>9,000,000</b>

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

*\*\*Funding awarded is Appropriation Year 2017 funding (for expenditure October 1, 2018 through September 30, 2019.)*