

**NON-SUBSTANTIVE CHANGE REQUEST JUSTIFICATION:  
TRADE ACTIVITY PARTICIPANT REPORT (TAPR): OMB 1205-0392**

ETA requests two non-substantive changes to the TAPR Handbook. The first concerns coding values for a data element on page 32 of the Handbook Appendix; the second clarifies that the number of post-exit quarters to be reported is ten rather than seven (p. 7 of the Handbook).

1) **CHANGE:** clarify data element definitions for Agent/Liable Identifier (TAPR Handbook, Appendix, p. 32), because the current coding values for this data element must be modified to ensure correct reporting.

**BURDEN CHANGE:** none

**BACKGROUND**

The coding values for this data element should indicate if the participant is receiving their TAA benefits and services from one state, or more than one state. In this data element,

- “1” was intended liable state responsibility only for those states that pay TRA for the participant only;
- “2” indicates that the individual is not receiving TRA from the reporting state, but is receiving some services and last;
- “0” should indicate that the liable/agent dynamic does not apply, or that there is only one state serving the participant. This was described in this way because, although there is always a liable state for a participant, the term “agent” state only occurs if there the state is providing services to the participant that is different from the liable state.

Many states are coding all of the participants that they serve exclusively as “1” or liable. This would imply that all of the state’s participants are actually being provided services outside of the state, which is clearly incorrect. The problem lies with the fact that the original definition did not state that the coding value “1” should be “liable only.” Thus, though these states are not indicating that any of their participants are being provided all TAA benefits and services in their state, in reality, most participants should fit this single state scenario.

**CHANGE REQUESTED**

The change, which clarifies the meaning of the coding values, is mapped in the chart below:

Current Coding Definitions	Proposed Coding Definitions
<p><b>Record 1</b> if the information contained within the participant’s record is being reported to the Department by the liable state. The definition for liable state can be found in 20 CFR 617. 26(a).</p> <p><b>Record 2</b> if the information contained within the participant’s record is being reported to the Department by the agent state. The definition for agent state can be found in 20 CFR 617. 26(b).</p> <p><b>Record 0</b> if the agent/liable does not apply to the participant.</p>	<p><b>Record 1</b> if the reporting state is serving the participant exclusively as a liable state. The definition for liable state can be found in 20 CFR 617. 26(a).</p> <p><b>Record 2</b> if the reporting state is serving the participant as an agent state. The definition for agent state can be found in 20 CFR 617. 26(b).</p> <p><b>Record 0</b> if the reporting state is both the paying state for UI (liable) as well as the state providing services (agent). Leave “blank” if the individual is not a participant.</p>

**2) CHANGE: Expand the period of time that program exiters are reported from seven quarters after exit to ten report quarters after exit (Page 7 of TAPR Handbook). This change will facilitate state corrections to data, streamline reporting under related data collections, and allow DOL to perform annualized performance calculations using a single file.**

**BURDEN CHANGE: None.** There is no burden increase estimated in this case because most states are already reporting 10 quarters after exit in their quarterly TAPR reports. Their state systems integrate reporting quarters with those required through the WIASRD, which requires reporting for 10 quarters after participants exit the program.

### **BACKGROUND**

In the spring of 2010, DOL was approached by a several states about changing the range of report quarters required in the TAPR to expand from 6 quarters after exit, to 9 quarters after exit. In part, this change was sought to coordinate with the reporting requirements of those that they reported as being served under the Workforce Investment Act, or WIA, through the WIASRD (OMB 1205-0339)

In the TAPR, states are currently required to submit records on participants from the point at which they are determined eligible for the program *through seven quarters after they exit the program*. After they exit the program, data is collected in each record that reflects the participant's employment information in the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> quarters after exit. This employment information is tracked through Unemployment Insurance (UI) wage records that take up to two additional quarters to collect. Thus, to collect complete employment data for all the participants that leave the program in a given quarter, they must be reported through 6 quarters after exit. In turn, DOL requires four quarterly files in order to track a year's worth of employment outcomes. States that wish to update their outcome information must do so through separate submissions that are specific to each report quarter in the year.

In contrast, the WIASRD uses a 9 quarter model for its data collection. Under this model:

- States that wish to update information from previous quarters stretching back up to a year may do so through a single file submission, rather than to resubmit for previous report quarters. Given that the majority of states report information to the Department using an electronic case management system that tracks participant information dynamically, the single file format gives states the opportunity to reflect updated information automatically with each submission.
- It eases the burden of states performing related OMB collections such as Data Element Validation (OMB 1205-0469) which requires *a year's* worth of file submissions to validate employment data. Under the new model, states would submit only one file, instead of the four that are currently required.

### **CHANGE REQUESTED**

The proposed change would require states to provide participant records through 9 quarters after said participant exit. Note that no "new" information is collected; rather states would simply be required, at a minimum, to report the same data for an additional 3 quarters. This change will also allow DOL to calculate annualized employment outcome results using each state's most recent file submission.