

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION TAA
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TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 6-09, Change 1

TO: STATE WORKFORCE ADMINISTRATORS
 STATE LABOR COMMISSIONERS
 STATE WORKFORCE AGENCIES
 STATE WORKFORCE LIAISONS
 ALL ONE-STOP CENTER SYSTEM LEADS

FROM: JANE OATES
 Assistant Secretary

SUBJECT: Revised Instructions for Implementing the Trade Adjustment Assistance (TAA) Trade Activity Participant Report (TAPR) with Edit Checks.

1. **Purpose.** The purposes of this guidance are: to update Training and Employment Guidance Letter (TEGL) No. 6-09, issued September 15, 2009 by describing the non-substantive changes that have been approved since then; to replace Attachment A: Data Preparation and Reporting Handbook (2009 TAPR Handbook), with TEGL No. 6-09, Change 1, Attachment A: 2012 Data Preparation and Reporting Handbook (2012 TAPR Handbook); and to make available a table of data validation edit checks for the TAPR, as Attachment B to this TEGL.
2. **References.** TEGL No. 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues; TEGL No. 6-09, Revised Instructions for Implementing the Trade Adjustment Assistance (TAA) Trade Activity Participant Report (TAPR); Workforce Investment Streamlined Performance Reporting (WISPR), Information Collection Request, Office of Management and Budget (OMB) Control No. 1205-0469 (Federal Register: June 18, 2008 (Volume 73; Number 118; Page 34791-34792).
3. **Background.** Following the issuance of TEGL No. 6-09 with the accompanying TAPR Handbook, the Employment and Training Administration (ETA) decided to make some changes in data element specifications based on substantial consultations with Cooperating State Agencies (CSAs or states) during the initial year of reporting for this collection. The suggested modifications do not alter the nature of the

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data that has been approved for collection, but provide adjustments in the data collection that support consistency with reporting structures in place for other ETA programs.

4. **Changes to the TAPR.** The list below comprises the changes to the TAPR announced through this guidance. All of the changes are based on consultation with states, and are marked based on pre-existing adjustments that require no new action (current), or scheduled for implementation for data files submitted beginning on the second report quarter of FY 2012, (new).

- A data numbering designation for each data element that corresponds to the Workforce Investment Streamlined Performance Reporting (WISPR) system (OMB Control No. 1205-0469) to allow for further anticipated integration of reporting across ETA programs. (current)
- A revised ordering of data elements within the 2012 TAPR Handbook Appendix for consistency with WISPR. (current)
- A special rule for tracking *Date of Participation* and *Date of Exit* as defined in TEGL No. 17-05 for individuals reported on the TAPR who access TAA benefits and services under two or more TAA certifications in succession to make clear that they are not receiving more than one training program under a single certification (see 2012 TAPR Handbook, pages 6 and 7). (current)
- Expanded flexibility for “when” to terminate reporting for TAA applicants who do not access TAA benefits and services for a period of time following a determination of eligibility (see 2012 TAPR Handbook, pages 6 and 7). (current)
- The option use either “0” or “blank” in instances where data is not required. The 2009 TAPR Handbook did not require consistent use of “0”s or blanks. (Wording for these options was added to approximately half of the data elements in the TAPR, and accounts for the bulk of the revisions throughout the 2012 TAPR Handbook). (current)
- Minor technical corrections to provide consistency of the reporting specifications throughout the guidance. (current)
- Extension of the cycle of reporting (TAPR Handbook, page 5) from six quarters following the quarter in which the *Date of Exit* occurs to nine quarters after exit. (new)
- Clarification of the definitions of coding values on TAPR Element #952-Agent/Liable Identifier (TAPR Handbook, page 32). (new)

5. TAPR Edit Checks.

In addition to modifications to existing specifications provided in TEGL No. 6-09 and its Attachment A, this guidance also contains, in Attachment B, edit checks that provide report level (TAPR) data

validation. These edit checks were also finalized following significant state consultation, and are designed to ensure that data submitted by the states on the TAPR is screened for accuracy, consistency, reliability and validity. Reports containing records that do not meet these standards cannot be successfully submitted to ETA.

There are four basic categories of edit checks listed on Attachment B:

- a. Valid Formats - this type of check verifies that the data is submitted in the required format (e.g., date, number, dollar value, etc.)
- b. Duplicate Record – prevents duplication of records for the same participant.
- c. Mandatory – these data elements are required for all TAPR records.
- d. Reject – records that fail the edit check logic in these instances will prohibit the submission of the entire report.

Edit checks referred to above in (d) are designed to ensure that all data elements are accurately entered and conform to the requirements for program administration of TAA benefits and services. Examples include:

- Date Sequencing – e.g., Date of TAA Application (TAPR Element #950) must occur on or before the Date of First TAA Benefit or Service (TAPR Element #951)
- Data Element for Benefit or Service that expands on a Data Element for the Same Benefit or Service – e.g., Weeks of Cumulative Additional TRA (TAPR Element #1427) must be greater than “0” if there is a Date of First Additional TRA Payment (TAPR Element #1425).
- Cross Reference of Two or More Data Elements to Provide Condition of Eligibility – e.g., Date of First TAA Benefit or Service (TAPR Element #951) requires a code value of “Y” (yes) for a Determined Eligible (TAPR Element #954). In other words, the participant record must show that the individual was eligible to receive TAA benefits and services if a TAA benefit or service was provided.

More than 80% of the edit checks published in this guidance have already been implemented. The remaining edit checks are scheduled for implementation for data submitted on FY 2012 files. These changes are marked in Appendix B under a row marked (C) for “current” or (N) for “new”.

6. **Action Requested.** CSAs are required to:

- discontinue following the reporting instructions provided in the 2009 TAPR Handbook, including Appendix: Trade Activity Participant Report, and instead follow the instructions in Attachment A: 2012 TAPR Handbook, including Appendix: Trade Activity Participant Report, and

- transmit Attachment B: TAPR Edit Checks to state program and reporting staff responsible for collecting and submitting quarterly TAPR data.

7. **Paperwork Reduction Act (PRA) Statement.** The annualized public reporting burden for the collection of information described in this TEGL is estimated to average 45 hours per state.

According to the PRA (44 U.S.C. 3501 et seq.), a Federal agency may not conduct or sponsor a collection of information, unless it is approved by OMB under the PRA, and displays a currently valid OMB control number (44 U.S.C. 3507). Also, notwithstanding any other provisions of law, no person shall be subject to penalty for failing to comply with a collection of information if the collection of information does not display a currently valid OMB control number (44 U.S.C. 3512). The currently valid OMB control number for this collection is OMB Control No. 1205-0392.

8. **Inquiries.** Inquiries related to the implementation of the revised reporting system should be directed to the appropriate regional office or TAA.reports@dol.gov.

9. **Attachments.**

Attachment A: 2012 Data Preparation and Reporting Handbook, including Appendix: Trade Activity Participant Report

Attachment B: TAPR Edit Checks