○ **UI** ○

Unemployment Insurance (UI) Benefit Operations Self-Assessment Tool:

Trade Readjustment Allowances (TRA) Under the Trade Adjustment Assistance (TAA) Program

REVIEW PERIOD: Begins   **Ends**

Unless otherwise noted, all questions are applicable to the review period.

1.   How many TAA certifications, if any, are currently in effect in the state?

SECTION 1:   Procedures, Policies, and Confidentiality

Resources may include manuals, handbooks, desk aids, computer help screens, training guides, organized collections of procedures or policies, or other readily accessible instructions which can help staff do their work correctly. Instructions will normally include general information such as compilations of relevant laws and regulations, including the TAA regulations at 20 CFR 617, as well as detailed instructions for carrying out individual duties in the agency consistent with 20 CFR 618. Reviewers may need to look in many places to examine all relevant instructions.

1.   Does the state have the current TAA/TRA administrative guidance (e.g., 20 CFR 617 and other pertinent TAA/TRA program letters/guidance, such as Training and Employment Guidance Letters (TEGL) 05-15, 10-11, 22-08 and 11-02) readily accessible to TRA staff?

2.   Does the state have written procedures for each of the following TRA activities? *(check all that apply)*
Preparing appropriate notification(s) regarding the potential availability of TRA once a DOL certification covering workers is issued
Preparing TAA/TRA required reports (e.g., Trade Act Participation Report (TAPR), TAA Activities Report)

Question 2 check boxes continue on next page

Implementing claims-taking operations including applications or forms
Implementing procedures for monetary determinations
Implementing procedures for non-monetary determinations
Implementing procedures for appeals
Implementing procedures for establishing/recovering overpayments consistent with 20 CFR 617.55
and applicable guidance
Systematic verification of eligibility requirements

3. How are policies and procedures for taking TRA claims made available to staff? *(check all that apply)*
Online
Hard-copy handbook
Training materials
Other (*explain*)

3a. Are all formats consistent and up-to-date?

3b. What practices does the state utilize to ensure all formats are consistent and up-to-date?

4. Were there any law changes during the review period that affected the state's TAA/TRA claims policies
and procedures (e.g., change in the general number of weeks payable)?

4a. If yes, describe the law changes that were implement, when were these changes implemented, and what was the effect on the state's TRA claims policies and procedures?

4b. If yes, have the state's policies, procedures, and training material been updated to reflect these changes?

4c. If no (to question 4b), explain.

5. Were there any new business processes implemented during the review period that affected the state's TRA claims policies and procedures?

5a. If yes, what business process changes did the state implement, when were these changes implemented, and what was the effect on the state's TRA claims policies and procedures?

5b. If yes, have the state's policies, procedures, and training material been updated to reflect these changes?

5c. If no (to question 5b), explain.

6. Were there any organizational changes during the review period that affected the state's TRA policies and procedures?

6a. If yes, what organizational changes did the state implement, when were these changes implemented, and what was the effect on the state's TRA policies and procedures?

6b. If yes, have the state's policies, procedures, and training materials been updated to reflect these changes?

6c. If no (to question 6b), explain.

7. Were there any automation or technology upgrades or releases during the review period that affected the state's TRA claims-taking procedures?

7a. If yes, what automation or technology upgrades did the state make?

7b. If yes, when were the technology upgrades made and what was the effect of the change?

7c. If yes, have the state's TRA claims-taking and related policies and procedures been updated to reflect these changes?

7d. If no (to question 7c), explain.

8. Do the state's procedures ensure that a TRA applicant's eligibility for regular UI be determined before establishing TRA entitlement?

9. Do the state's policies and procedures ensure the state is adhering to the definition of "adversely affected workers" as eligible TRA claimants as provided in 20 CFR 617.3(c)?

10. Does the state conduct an identity verification of claimants when they file TRA initial claims?

10a. If yes, through what entities and by what means is identity verification conducted?
(check all that apply)

SSA:
    Real-Time   Batch

DMV:
    Real-Time   Batch

Other:
    Real-Time   Batch

Other:
    Real-Time   Batch

11. Does the state have policies and procedures in place to identify eligible TAA recipients?

11a. If yes, is the state able to electronically transmit the eligibility date to the IRS?

12. Does the state have policies and procedures in place to identify eligible ATAA/RTAA recipients?

12a. If yes, is the state able to electronically transmit the eligibility date to the IRS?

13. Does the state have policies and procedures related to identifying individuals covered by a USDOL TAA certification to inform them of potential benefits consistent with the requirements of 20 CFR 617.4?

14. Does the state have policies and procedures related to contacting individuals covered by a USDOL TAA certification to inform them of potential benefits consistent with the requirements of 20 CFR 617.4 (e.g., newspaper, radio, email)?

15. Does the state have policies and procedures to ensure that an application for TAA/TRA is taken timely so that individuals can receive service prior to exhaustion of their regular UI benefits pursuant to 20 CFR 617.10 and other applicable guidance?

16. Do the state's policies and procedures apply the TRA eligibility requirements as enumerated at
20 CFR 617.11(a)(2)?

16a. Specifically, does the state verify that the adversely affected worker meets the following
conditions? *(check all that apply)*

Is covered by a TAA certification

Was separated within the timeframe specified in the certification

Meets the wage and employment test (52-week period preceding the qualifying separation to
establish TRA eligibility)

Has established UI entitlement

Has exhausted such UI entitlement (except as provided for 2009, 2011, or 2015 eligible
workers, as provided by USDOL advisories)

Meets the EB work test [unless 617.17(b)(2) applies]

Participates in TAA approved training

17. Do the state's policies and procedures require that the state verify that individuals meet the following
specified enrollment deadline for all TRA eligibility? *(check all that apply)*

8 weeks following the date of TAA certification or 16 weeks following the applicable date of
separation if covered under the 2002 program amendments or under Reversion 2014

26 weeks from either the date of the TAA certification or 26 weeks following the applicable date
of separation if covered under the 2009, 2011, or 2015 program amendments

18. Do the state's policies and procedures address waivers of the TAA training participation requirement for
basic TRA eligibility?

18a. If yes, do the state's policies and procedures address the review of training waivers that must be
conducted every 30 days?

18b. If yes, describe mechanisms that are in place to ensure such review(s) take place.

18c. If yes, is there a system to ensure that revocation of any waiver(s) is properly addressed (e.g.,
written notice of revocation, appeal rights) and other appropriate action is taken?

19. Do the state's policies and procedures detail acceptable proof of earnings to establish TRA monetary determinations for adversely affected workers as provided in 20 CFR 617.11(a)(2)(iii) and 20 CFR 617.12?

20. Does the state have policies and procedures in place to ensure that TRA is paid only during the applicable eligibility periods in 20 CFR 617.3(m) and applicable guidance?

21. Do the state's policies and procedures include a communication plan to ensure the timely provision of information to workers covered by TAA certifications as required in 20 CFR 617.4?

22. Does the state have systematic procedures in place to calculate the correct maximum monetary entitlement for basic TRA, as provided in 20 CFR 617.14?

23. Does the state have procedures to determine and calculate the weekly benefit amount in accordance with 20 CFR 617.13?

24. Does the state require the filing of an initial claim for basic, additional, and completion TRA?

25. Does the state have policies and procedures to ensure that individuals continue to meet TRA eligibility requirements?

25a. If yes, do the policies and procedures address continued participation in TAA training requirements for TRA eligibility?

25b. If yes, do the policies and procedures address a review of potential subsequent UI eligibility?

26. Do the state's policies and procedures provide for the retention of TRA records for a minimum of three years after final action on the claim, including appeals, court actions, and overpayment recovery?

27. Does the state have policies and procedures to ensure the Trade Act Participant Report and TAA Activities Reports are verified and submitted timely?

28. Do the state's policies and procedures for taking TRA claims comply with Federal Equal Employment Opportunity laws and regulations in accordance with 29 CFR Part 31 and 29 CFR Part 32?

29. Do the state's policies and procedures provide for the confidentiality of TRA claim records in accordance with 20 CFR 603.5?

30. Does the state have procedures to inform claimants that confidential information provided for the TRA claim may be requested and utilized for other governmental purposes, including verification of eligibility under other governmental programs, in accordance with 20 CFR 603.11?

   30a. If yes, how and when is this information provided to the claimant?

31. Does the state have procedures to inform employers that wage information and other confidential information provided relating to a claim may be requested and utilized for other governmental purposes, including verification of an individual's eligibility for other governmental programs in accordance with 20 CFR 603.11?

   31a. If yes, how and when is this information provided to employers?

SECTION 1: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 2: Training

Managers/employees should possess and maintain a level of expertise which enables them to accomplish their assigned duties. Training systems should be sufficient to ensure that personnel understand and perform their duties properly. When reviewing training systems, reviewers must look for formal training procedures (e.g., the training is conducted using an established schedule and using set guidelines to make judgments about the quality of work being produced). There should be procedures for identifying general and specific training needs and for delivering training as needed.

1. Does the state have a training curriculum for TRA claims taking?

2. Does the state include TRA training in its training plan for new staff?

2a. If yes, how long is the TRA training?
Less than one week (e.g., orientation)
One to two weeks
More than two weeks
Other (*explain*)

3. Does the state have a training plan to provide continuing or "refresher" TRA training to staff?

3a. If yes, how often is the continuing training conducted?

    Quarterly   Annually   On an as-needed basis

    Other (*explain*)

4. How does the state deliver its TRA staff training? *(check all that apply)*

    Classroom setting

    On-the-job training

    Self-guided online course

    One-on-one training

    Other (*explain*)

5. Describe any technology or operational changes that were made during the review period that affected TRA claimstaking.

5a. Were all affected staff trained on these technology or operational changes prior to implementation of the changes?

6. Is training provided to staff for the technology they will use for taking TRA claims (e.g. cell and/or satellite phones, tablets, laptops, etc.)?

7. Is there a method to obtain feedback from participants regarding the effectiveness of the training given?

    7a. If yes, how is feedback obtained from participants?

8. Is there a means to obtain feedback from management staff on the effectiveness of the training, based upon staff performance following training?

    8a. If yes, how is feedback obtained from management staff?

9. Is appropriate TRA training provided to staff in relevant program areas, (e.g., Appeals) to ensure a functional understanding of the TRA requirements and consistency of application?

10. If the state took TRA claims during the review period, were any training needs identified as a result of the experience?

10a. If yes, what training needs were identified?

10b. Has the necessary training been delivered?

10c. If not, explain.

SECTION 2: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 3: Workload Analysis / Management Controls

The state's ability to respond to and handle TRA claims workloads, particularly during times of unforeseen increases in TRA claims, is analyzed. Methods used to mitigate backlogs, when they occur, substantially affect the state's ability to provide timely benefit payments to claimants.

1. Does the state have a systematic method for tracking TRA initial claim processing and workload backlogs?

   1a. If yes, is the data collection automated?

2. If the state tracks TRA initial claims and backlogs, how often are these reports generated?

Real-time	Daily	Weekly	Monthly	Quarterly	As needed	N/A

3. Does the state's system generate reports on timeliness of processing TRA initial claims?

4. Does the state have procedures for early evaluation of staffing needs when heavy increases of TRA workloads occur and timely request for approval to use overtime to ensure efficient delivery of services?

5. What practices does (would) the state utilize for handling a high volume of TRA initial claims?
(check all that apply)

   Hire additional temporary staff
   Assign qualified staff from different units
   Request assistance from other states
   Overtime
   Adjusted work schedules, including extended and weekend hours

Question 5 check boxes continue on next page

Temporary adjustments to claims taking methods (*explain*)

Other (*explain*)

SECTION 3: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 4: Performance Management

The state's practices for monitoring program performance and compliance with Federal and state law and regulations are examined.

1. What unit or office is responsible for monitoring the performance and readiness of the state's TRA operations?

  1a. What methods are used to monitor the TRA operations to ensure the program is operated in accordance with Federal and state law and regulations?

  1b. How frequently is the TRA program review conducted to ensure readiness, compliance, operational integrity ,and that all mandatory processes are addressed?
  Quarterly   Semi-annually   Annually
  Other (*explain*)

2. Does the state monitor TRA program activity and performance in addition to monitoring set out in Federal requirements?

2a. If yes, explain what areas are monitored and the methods used.

SECTION 4: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 5: Information Technology

The state's IT projects relating to TRA claims completed during the review period and planned for the future are addressed. The reviewer will assess the state IT department's delivery of programming and technical support to the UI Benefits Section. Having a disaster recovery plan as well as contingency planning to implement emergency UI programs with a short lead time is vital to continued operations under extreme conditions. Special Programs such as TRA should be addressed in the state's Continuity of Operations Plan.

1. Does the state have an automated TRA initial claims taking system?

1a. If yes, during the review period, were there any IT projects that impacted the TRA initial claims system?

1b. If yes, what were the projects, are they completed or on-going; if on-going, what is the expected completion date for each?

1c. If the state does not have an automated TRA claims taking system, is any part of the TRA claims processing automated, such as the monetary determination?

1d. If yes, explain.

2. Does the state have the capacity to accept TRA continued claims via the Internet?

3. Does the state have the capacity to accept TRA continued claims via the telephone?

4. During the review period, were there IT needs for the TRA initial claims system that were not met that affected program performance?

    4a. If yes, describe what IT needs were not met, the reason they were not met, what effect it had on the program and the state's plans to meet these needs, if any?

5. Does the state have a disaster recovery plan that will ensure continued operations of the TRA initial claims system in the event a natural disaster affects state locations/operations, or should a pandemic incident occur?

    5a. If yes, has the state tested the plan, and if so, what was the date of the most recent test and results of the test?

6. What IT systems does the state use to support the TRA claims process? *(check all that apply)*

Internet claims

Interactive Voice Response (IVR)

Kiosks

Mainframe terminals

Online assistance

Other (*explain*)

7. Describe measures that the UI agency has in place to ensure that only the claimant or someone authorized by the claimant can access claim information online or via phone (e.g., passwords, codes, Personal Identification Number (PIN), etc.).

8. Does the TRA claims system integrate real-time with the UI Legacy system or operating system?

8a. If no, what is the schedule for batch processing?

SECTION 5: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 6: Claimant / Employer Access & Communication

The reviewer will document all methods the state uses to take TRA initial claims. States need to maintain compliance with requirements set forth in Federal law and guidance. Claim-filing systems should be user-friendly, customer-facing systems and integrated operating systems to provide the best customer experience and efficient operations.

1.   What method(s) does the state use to take TRA initial claims? *(check all that apply)*

Basic TRA:
    Internet
    In-person
    Telephone
    Mail
    Other (*explain*)

Additional TRA:
    Internet
    In-person
    Telephone
    Mail
    Other (*explain*)

Completion TRA:
    Internet
    In-person
    Telephone
    Mail
    Other (*explain*)

2. What methods does the state use to take TRA continued claim certifications? *(check all that apply)*
    Internet
    In-person
    Telephone
    Mail
    Other (*explain*))

3. Describe how each of the state's filing methods is publicized so that claimants are made aware of them. *(check all that apply for each filing method)*

Internet:
    Website   Posters in Job Centers   Media   Rapid Response Meetings

Question 3 check boxes continue on next page

Other (*explain*)

N/A

Telephone:
Website Posters in Job Centers Media Rapid Response Meetings
Other (*explain*)

N/A

In-person:
Website Posters in Job Centers Media Rapid Response Meetings
Other (*explain*)

N/A

Mail:
Website Posters in Job Centers Media Rapid Response Meetings

Question 3 check boxes continue on next page

Other (*explain*)

N/A

Other:

Website   Posters in Job Centers   Media   Rapid Response Meetings
Other (*explain*)

Other:

Website   Posters in Job Centers   Media   Rapid Response Meetings
Other (*explain*)

4. What resources are available to a claimant to file a TRA initial claim? *(check all that apply for each filing method)*

Internet:
    Workforce/One-Stop Centers
    Kiosks in locations accessible by the general public

Question 4 check boxes continue on next page

Call/Contact Centers
Other (*explain*)

N/A

Telephone:
Workforce/One-Stop Centers
Call/Contact Centers
Other (*explain*)

N/A

In-person:
Workforce/One-Stop Centers
Kiosks in locations accessible by the general public
Call/Contact Centers
Other (*explain*)

N/A

5. What access methods does the state use for the following TRA functions? *(check all that apply for each access method)*

Claim Status Requests:
      Internet   Telephone   In-person

Address Changes:
      Internet   Telephone   In-person

Forms Download:
      Internet   Telephone   In-person

Benefit Rights Information:
      Internet   Telephone   In-person

Provide Bank Information For Direct Deposit of Benefits:
      Internet   Telephone   In-person

5a. If address changes are accepted without staff assistance, what security procedures are in place to validate the requestor's identity to ensure that only authorized changes are made?

5b. If downloadable forms are available, what downloadable forms are offered to TRA claimants?

6.   What types of assistance is available to assist claimants in filing a claim for each claim filing method used? *(check all that apply for each filing method)*

Internet:
   Online tutorials
   Help screens
   Hyperlinks to FAQs
   Online chat with staff
   N/A

Telephone:
   Staff assisted
   FAQ Menu
   N/A

In-person:
   Staff assisted
   Brochures/Pamphlets
   N/A

7.   How is the Benefits Rights Information provided to claimants for the following claim filing methods?
(check all that apply for each filing method)

Internet:
   Electronic certification (web)
   Telephone/IVR certification
   Verbal by claims taker
   Mailed
   Other (*explain*)

   N/A

Telephone:
   Telephone/IVR certification
   Verbal by claims taker
   Mailed

Question 7 check boxes continue on next page

Other (*explain*)

N/A

In-person:
    Verbal by claims taker
    Printed handout
    Signed BRI
    Mailed
    Other (*explain*)

N/A

Mail:
    Verbal by claims taker
    Mailed
    Other (*explain*)

N/A

8. How are forms obtained when claims are filed using the following methods? *(check all that apply for each filing method)*

Internet:
    Mail
    Email
    Other (*explain*)

    N/A

Telephone:
    Mail
    Email
    Other (*explain*)

    N/A

Question 8 check boxes continue on next page

In-person:
    In-person
    Mail
    Email
    Other (*explain*)

    N/A

9. Does the TRA claims application process have a feedback mechanism for claimants to share customer services related comments?

SECTION 6: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 7: Operational Efficiency / Resource Allocation

Are sufficient resources available--training, facilities, staff, etc., to support program operations? Effective analysis of initial claims performance results assures the most productive utilization of resources. The reviewer will provide information regarding any business process improvements that were made during the review period or that are planned for the future.

1.   Is the TRA claims system operated on a single computer platform or operating system?

    1a. If multiple platforms are in use, is there seamless integration between the systems being used?

2.   How does the state handle supporting evidence that is sent in as hard-copy forms and documents?
   They are kept and archived as hard-copy forms
   They are imaged and stored as electronic forms/data
   Other (*explain*)

3.   During the review period, did the state utilize customer surveys or focus groups to gather input on the TRA claims processes to identify efficiencies or operational improvements that could be made?

    3a. If yes, when was the last survey or focus group study conducted?

3b. If yes, what process improvement recommendations did the state implement as a result of these efforts?

3c. If yes, what (if any) changes were recommended but not made? *(explain why)*

4. Does the state have any business process improvements planned for TRA claims processing?

4a. If yes, what improvements are planned and when are they due to be completed?

SECTION 7: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 8: Staffing

Staffing levels and organizational changes all can affect the state's ability to manage its claims workload and provide the desired levels of customer service.

1. Does the state have a designated TRA Coordinator?

    1a. If yes, how long has the TRA Coordinator held this position?

    1b. Where in the organization does the TRA coordinator position reside?

    1c. If there is no TRA coordinator, what plans does the state have for designating this responsibility?

2. Does the state have a contingency plan to handle workload fluctuations in TRA claims (e.g., identifying staff with TRA claims experience and knowledge to assist with TRA program operations)?

3. Did personnel actions occur that impacted TRA claims staff during the review period?
   (check all that apply)

   Hiring freeze(s)

   Temporary or permanent staff reductions

   Retirement/buyouts

   Question 3 check boxes continue on next page

Other (*explain*)

N/A

3a. If the state implemented a hiring freeze, when did it occur and how long did it last?

3b. If the state underwent temporary or permanent staff reductions, how many TRA claims staff were affected, when did the action occur and how long did it last?

3c. If the state experienced retirements in its TRA claims staff or had a retirement buyout during the review period, provide the number of TRA-related staff that left due to retirement.

3d. What percentage of the overall TRA claims staff was impacted as a result of temporary or permanent staff reductions and/or retirement? _____ %

3e. If the state experienced turnover during the review period, what percentage of the TRA claims positions remain vacant? _____ %

4. Does the state have a specialized TRA unit for processing TRA initial and continued claims?

SECTION 8: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

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SECTION 9: Fiscal Management

The state's practices for managing its grants and fiscal compliance with Federal and state law and regulations are examined.

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1.   How does the state ensure that TRA administrative funds remain within the total funding obligation from USDOL?

2.   Does the state have procedures to ensure that fiscal reporting for TRA claims activity is in place and current, per OMB Circular A-102?

   2a.   What unit or office is responsible for preparation and submission of required TRA/TAA fiscal reports?

3.   Does the state have procedures to ensure that statistical reporting for TRA claims activity is in place and current, per 20 CFR 617.57?

   3a.   What unit or office is responsible for preparation and submission of TAA/TRA statistical reports?

SECTION 9: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 10: **Concluding Summary Comments for Trade Readjustment Allowances (TRA) Under the Trade Adjustment Assistance (TAA) Program**

Considering all the areas examined in TRA Under the TAA Program, provide any appropriate responses to the following narrative questions. Additional space for comments and reviewer notes is available on pages 49 and 50.

1. Provide any observations of good and/or exemplary performance in the state's TRA claims operations that would constitute successful practices to share with other states.

2. Document any issues detected in the state's TRA claims operations that adversely affects the state's performance or customer service. Identify any corrective action measures that should be taken to improve the state's performance in regards to any weaknesses identified.

3.   Add any additional comments, concerns, or observations regarding the state's performance or operations in its TRA operations that have not been addressed elsewhere and should be noted.

Additional Comments and Reviewer Notes:

Reviewer Information:

REVIEWER

Name:

Title:

Email:

Phone No.:

ADDITIONAL REVIEW TEAM MEMBER

Name:

Title:

Email:

Phone No.: