

## Chapter: 11 Case Management During Training

Case Management is required to assist the Customer in navigating his/her way through meeting eligibility deadlines, finding the right career path, and the development of his/her employment plan, including enrollment in a training program that leads to suitable employment. The Case Manager must work with the Customer throughout his/her training program to ensure all requirements continue to be met so the Customer can fulfill the training benchmarks, receive his/her UI/TRA, obtain the Industry-Recognized Credential for successful completion of the training program, and find suitable employment.

During the development of the training plan, the Case Manager puts mechanisms in place to track the Customer's progress through the training program. It is the Customer's responsibility to provide the Case Manager with all the required documentation, paperwork, and completed forms in a timely manner. It is the Case Manager's responsibility to provide ongoing guidance, process program modifications, as well as track, record, and report the Customer's attendance and progress in a timely manner. Below are the responsibilities of the Customer and the Case Manager throughout the training program.

In Liable and Agent State situations, follow the guidance set forth in Chapter 5: Liable and Agent State Responsibilities.

Customers who Return to Work may, based on his/her schedule, continue with the approved Training Plan on a full-time or part-time basis provided the training can be completed in the allowable training weeks. Customers may cease participation in a training program if they obtain suitable employment. Customers who cease participation due to obtaining suitable employment may be able to resume the Training Plan if the 6 conditions of training are still met, and he/she can complete in the allowable training weeks. See the Potential Suspension Requests section for additional information.

### Trade Training Requirements Fact Sheet

**Trade Form #006b Trade Training Requirements Fact Sheet (#006b)** informs the Customer of the responsibilities (the primary "dos" and "don'ts") associated with enrollment in training, compliance while in training, eligibility to receive UI/TRA to complete the training successfully, meeting the benchmarks and obtaining the Industry-Recognized Credential. The **#006b** form is signed and dated by the Customer prior to the start of training. Sometimes it is necessary to periodically review this form with the Customer and have him/her sign and date a new form as a reminder, especially if he/she is non-compliant with the rules. Continued disregard for the rules may result in the Customer not being allowed to complete the training.

### Trade Training Program Tracking Form

During the Enrollment in Training process, the Case Manager and Customer will complete the **Trade Form #006d Trade Training Program Tracking Form (#006d)** or the **#006e Trade Training Program Course Tracking Form (#006e)** (for individual courses such as IT classes). All schools

publish the required curriculum for an individual training program. It lists all the classes/electives by term that should be taken to complete the program and receive the credential/degree. On the form, the Case Manager records all required Remedial classes, Pre-Requisites classes, Occupational classes, Internships as well as any electives needed for successful completion of the Training Plan. If the Customer has received prior credit for classes that would apply toward this training program, these are also listed on the form indicating the date taken and the grade received. Credit for prior classes must be pre-approved by the training institution and that documentation must be in the file. Each term the Customer must submit his/her class schedule prior to being approved to attend that term. This form is placed in the Customer's file and uploaded in IWDS on the TAA application List All Documents.

The **#006d Trade Training Program Tracking Form/#006e Trade Training Program Course Tracking Form** must be updated as follows:

**Prior to each term** the Case Manager is required to obtain, review and approve the Customer's **Class Schedule** before issuing a voucher or allowing the Customer to attend classes. The Case Manager must ensure that the schedule includes the training program's required classes/electives. The Case Manager will update the Customer's **#006d/#006e** to ensure the Customer is enrolled in the required classes. The Case Manager should note if the Customer's new class schedule consists of filler classes which do not count towards the program requirements to ensure the Customer is signed up for classes he/she needs. The Case Manager should retain a copy of the schedule and the updated **#006d/#006e** in the Customer's file and upload in IWDS on the TAA application List All Documents when requesting Merit Staff approval.

**At the end of each Term** the Case Manager is required to obtain a copy of the grades, record the grades on the **#006d/#006e**, add a Case Note and update the Benchmarks in IWDS. This completed/updated form will be uploaded in IWDS on the TAA application List All Documents with other Training documents when requesting Merit Staff approval for the Training plan and subsequent revisions. This must be completed prior to the next Term to determine that a Customer can continue with the training program. When reviewing, please note the following: Did the Customer pass all classes with acceptable grades? If not, will the Customer be required to retake the class? (Note: In Trade, the customer can retake a course once per failed course.) Does this affect the sequencing of required classes? Did the Customer receive an Incomplete or withdraw from a class? Will this affect the Training end date? Will the Customer still complete the training within the allowable training weeks? Can the Customer continue in the training program? A meeting with the Customer may be required to determine if he/she remains on track to complete on time, in good academic standing and if an IEP revision is necessary.

Additionally, at the end of each term, the Case Manager must record Measurable Skills Gains in IWDS. See the Measurable Skills Gains chapter for instructions.

If the Customer is unable to complete on time or is non-compliant with the Trade training requirements, send the **Commerce/Trade Form #003c Trade Potential Suspension Letter**. See the **Potential Suspension Requests** section.

All revisions or modifications must be tracked on this form in a timely manner. If the revisions to the training program affect the cost or the time to complete the program, an IEP revision must be submitted for State Merit Staff approval. The on-going updating of this form will assist the Case Manager with the review and completion of accurate Training Benchmarks to determine Satisfactory Academic Standing and if the Customer is On Track to Complete Training within the Agreed upon Timeframe.

If at ANY point in the training the Customer quits or drops below full-time status, the Case Manager must follow the Potential Suspension Request process. If the Customer drops below full-time status and it is determined he/she cannot complete the training by the approved planned end date, a new benchmark must be added. See the **Tracking and Reporting the 60 Day Training Benchmark Requirements** section. IDES pays Completion TRA based on the Case Manager's Benchmark Reviews. Therefore, the information must be up-to-date and accurate to avoid an overpayment of TRA benefits.

### **Ongoing Maintenance for Daily Transportation and/or Per Diem/Subsistence Assistance (if applicable)**

A Customer's Daily Transportation and/or Per Diem/Subsistence may need to be recalculated during the training. At the beginning of every training term, twice a year (January and October) and for various other reasons, the Case Manager will need to re-evaluate the Customer's eligibility for, and possibly, the amount of, Trade Transportation/Subsistence assistance.

### **Reasons that may affect the Customer's reimbursement for Daily Transportation and/or Per Diem/Subsistence Assistance include:**

- The training institution location changes (e.g. the course is relocated, a course is held off campus, the physical location of the institution changes, there are multiple locations for a training institution the Customer may be required to attend, or the Customer may attend more than one training institution). Case Managers must enter a Training Service Record for each training institution the Customer is attending;
- The Customer's home location changes
- The Federal GSA Per Diem (October) or Federal GSA Mileage Rate (January) change. It is possible that a change in either will change a Customer's eligibility to or from Daily Transportation and/or Per Diem/Subsistence; and/or
- The number of days the Customer is scheduled to attend changes. This may include when the Customer adds or drops classes.

Once the original **Trade Form #005 Eligibility Determination for Trade Travel Assistance** is **completed**, any change requires the Case Manager complete the **Pre-Approved Changes Section** to Travel Assistance Section of the **#005**. If the customer is traveling between the same locations as the previously completed **#005** and Google Map printout, complete the **Pre-Approved Changes Section** but a new Google Map printout is not required. Attach a copy of

the original Google Map to the **Pre-Approved Changes Section**. This is the same process if the number of days the Customer is scheduled to attend changes. If the Customer's home location or the location of the training changes, the Case Manager must complete the **Pre-Approved Changes Section** and attach a new Google Map.

It is possible that a change to the Federal GSA Per Diem rate does not affect the Transportation Assistance the Customer receives, so completion of the **Pre-Approved Changes Section on the #005** and a **Case Note** are all that is required.

The **Trade Form #007 Trade Individual Training Account (ITA) Projection (#007)** and the **Trade Form #014 Trade Individual Employment Plan (IEP) (#014)** must be revised if the change affects the cost of the training or changes eligibility to or from Daily Transportation and/or Per Diem/Subsistence.

**The Case Manager will make the following entries in IWDS:**

- Enter a **Case Note** in IWDS indicating the reason for the change and IEP revision.
  - If there is no change, enter a detailed Case Note in IWDS and the other actions in this section are not necessary.
- Update the **IEP Status Comments** and **Amount Approved** (if the amount or eligibility changes) with a dated entry referencing the **Case Note**.
- Upload all pertinent forms and documentation to the **List All Documents** in the TAA Application.
- The Case Manager will request State Merit Staff Approval.

### **Requesting State Merit Staff Approval For IEP Revisions**

IEP Revisions are required when anything in the Customer's training plan changes. The Customer and Case Manager must sign the IEP form (as well as all other required forms) indicating acceptance of the change. The Customer signature is required only when the change binds the Customer to a new expectation or a provision in the Trade regulations (this includes any change to the training plan or travel amount) and therefore is not required for a Final Cost reconciliation. The Case Manager will formally request the IEP Revision by forwarding the last State Merit Staff approved email for that customer, add the IEP format below and send to Trade State Merit Staff. State Merit Staff must approve of the change in IWDS.

#### **IEP Revision Format**

Name of Student:

School:

Program:

Total Training Weeks:

Start Date:

End Date:

Current Transportation Cost:

Training Cost:

Current State Merit Staff Approved Total IEP Cost:

Final Transportation Cost:

Final Training Cost:

Final Total IEP Cost:

Justification Case Note:

## **Recording Training Interruptions**

Many training programs have **scheduled breaks**. Additionally, there are times when the Customer may have a legitimate reason to interrupt the current training service. A break in training that is scheduled by the training institution and is less than 30 countable days is considered a **Payable Training Interruption**. A break in training that is 30 countable days, or more is considered a **Vacation Break**. Scheduled Breaks are listed in the training institution's catalog or on their website. Examples of a scheduled break include Thanksgiving break, Winter break, Spring break, and Summer break.

To calculate a break: "The days within a break in a training program that shall be counted in determining the number of days of the break for the purposes of paragraph (d) of this section shall include all calendar days beginning with the first day of the break and ending with the last day of the break, as provided for in the schedule of the training provider, except that any Saturday, Sunday, or official State or National holiday occurring during the scheduled break in training, on which training would not normally be scheduled in the training program if there were no break in training, shall not be counted in determining the number of days of the break..." 20 CFR 617.15(d) (iii) (4).

Customers will continue to receive Basic TRA and Additional TRA during scheduled breaks in training only if the break is a **Payable Training Interruption**. If the Customer is receiving Basic TRA the interruption does not count against the total number of training weeks available however, the Customer must still collect Basic TRA within the 104 week eligibility period. This is not the case for Additional and Completion TRA; the interruption, depending on the length of the break, may count against the total number of available training weeks the Customer will receive Additional TRA. All breaks in training must be tracked in IWDS as detailed below.

### **When a break in training occurs:**

- When an approved training program involves more than one course and involves breaks in training (within or between courses, or within or between terms, quarters, semesters and academic years) and the **break is less than 30 calendar days**, the Case Manager must promptly enter a **Payable Training Interruption (PTI)** service record on IWDS. Entry of this service will generate a Payable Training Interruption status record. The start date of the PTI is the first calendar day following the last day of attendance.

- If the Customer is taking individual courses (ex. Computer Certification Courses), those individual courses will be listed on the **Trade Form #006e Trade Training Program Course Tracking** form which shows the start and end date of each course. The Case Manager will calculate the calendar days in the break between courses (if applicable) and enter a **Payable Training Interruption** for each break if the break between courses is less than calendar 30 days. If the break between courses are within the same week, see bullet below. A **Vacation Break** will be entered if the break between courses is 30 calendar days or greater.
- If the training break of **less than 30 calendar days** occurs in the same calendar week (Sunday to Saturday) then it is not necessary to enter a **PTI**. For example, a Customer is enrolled in individual classes (IT certification classes) and there are two classes, one is a two-day class that occurs on Monday and Tuesday and then the next class begins in the same week on Thursday and Friday, a Payable Training Interruption is not necessary to be entered. However, if the second set of classes were not until the following Thursday and Friday, which crossed over into a new calendar week, a **Payable Training Interruption** must be entered.
- For any **break of 30 calendar days or more**, promptly enter a **Vacation Break Status** record and the reason on the IWDS TAA status screen. It must include a beginning and ending date. The Case Manager must update the IEP Status, paper **IEP #014**, Case Notes and request State Merit Staff approval. The Customer will not receive TRA benefits during the break.
- Both status records will be transmitted to IDES on a nightly report to ensure proper payment of benefits. Timely entry of these status records is of utmost importance. If a Customer is on a **Vacation Break** of 30 calendar days or more, he/she is not to be paid TRA benefits. If the LWIA does not enter the **Vacation Break** status record when the break starts, an overpayment to the Customer may result.

**For Payable Training Interruption entries -- The Case Manager will make the following entries in IWDS:**

- Enter a **Payable Training Interruption** under Services, select List Enrolled Services/Add Enrolled Service.
- For Title select TAA, click Next, for Service Level select Job Training and enter the date the **Payable Training Interruption** will begin, click Next.
- For Activity select Payable Training Interruption and click Next.
- Complete the remaining fields for the Planned End Date and add any comments and click on Save. The start date of the PTI is the day following the last day of attendance.
- The IWDS system will automatically create a **Payable Training Interruption** Status record and a report will be transmitted to IDES so they will know the Customer is on a break of less than 30 calendar days and that the Customer's TRA can continue.
- Enter a **Case Note** in IWDS indicating the reason for the break in training.

**For Vacation Break entries -- The Case Manager will make the following entries in IWDS:**

- Enter a **Vacation Break** under Status, select List TAA Status and Add TAA Status.

- Under Status select Vacation Break, click Next.
- **Enter the Status** start date and end date, enter all relevant comments in the Comments box, click Save. The start date of the break is the day following the last day of attendance.
- Update the IEP Status Comments.
- Update the paper **IEP #014**.
- Enter a **Case Note** in IWDS indicating the reason for the break in training.
- Request State Merit Staff Approval.
- A report will be transmitted to IDES, so they will know the Customer is on a break of 30 calendar days or more, so the Customer's monetary benefits will stop for that period.

When the **Payable Training Interruption** is complete, and the Customer returns to class(es), **the Case Manager will make the following entries in IWDS:**

- Select List Enrolled Services and click on the link for the active **Payable Training Interruption** Service record.
- Add the end date, change the Current Status to Successful Completion and then add any necessary comments, click on **Save**.
- Successful Completion will be selected if the Customer completes the break and resumes training at the end of the less than 30 calendar day break.
- Enter a **Case Note**.

If the Customer fails to return to class(es) following the PTI, **the Case Manager will make the following entries in IWDS:**

- Select List Enrolled Services and click on the link for the active **Payable Training Interruption** Service record.
- Add the end date, change the Current Status to Unsuccessful Completion and then add any necessary comments, click on **Save**.
- Enter a **Case Note**.

If the Customer fails to return to training altogether following a PTI, he/she may have a TRA overpayment back to the start date of the PTI. IDES will make this determination and notify the Customer. If the Customer returns to training but it is 30 countable days or more following the last date of attendance, a Vacation Break must be entered. The start date of the Vacation Break is the start date of PTI. The PTI will be ended as Unsuccessful.

## Trade Training Attendance Tracking

Another way information is gathered and used to track the 60 Day Benchmarks is by the timely submittal, review and recording of the Customer's **#006a Bi-Weekly Attendance** sheets. This process helps the Case Manager monitor the Customer's progress in both Benchmarks as well as the requirement to attend all scheduled classes to receive TRA benefits. If a Customer is constantly missing classes that generally signals a current or future problem that the Case

Manager needs to address immediately. Why are they missing classes? How are missing classes affecting their grades? It is very important for the Case Manager to keep up with bi-weekly attendance tracking and reporting in IWDS to ensure the Customer is attending regularly. This form is also where the instructor reports issues or concerns utilizing the question that asks if the Customer is successfully progressing through the listed course. All boxes on this form must be completed.

Attendance is required by Federal Law in 20 CFR § 617.18 **Disqualifications**.

- (a) State law applies. Except as stated in paragraph (b) of this section and § 617.55(b), an individual shall not be paid TRA for any week of unemployment the individual is or would be disqualified to receive UI under the disqualification provisions of the applicable State law, including the provisions of the applicable State law which apply to EB claimants and which are consistent with section 202(a)(3) of the Federal-State Extended Unemployment Compensation Act of 1970.
- (b) Disqualification of trainees -
  - State law inapplicable. A State law shall not be applied to disqualify an individual from receiving either UI or TRA because the individual:
    - Is enrolled in or is participating in a training program approved under § 617.22(a); or
    - Refuses work to which the individual has been referred by the State agency, if such work would require the individual to discontinue training, or if added to hours of training would occupy the individual more than 8 hours a day or 40 hours a week, except that paragraph (b)(1)(ii) of this section shall not apply to an individual who is ineligible under paragraph (b)(2) of this section; or
    - Quits work, if the individual was employed in work which was not suitable (as defined in § 617.22(a)(1)), and it was reasonable and necessary for the individual to quit work to begin or continue training approved for the individual under § 617.22(a).
  - Trainees ineligible.
    - An individual who, without justifiable cause, fails to begin participation in a training program which is approved under § 617.22(a), or ceases to participate in such training, or for whom a waiver is revoked pursuant to § 617.19(c), shall not be eligible for basic TRA, or any other payment under this part 617, for the week in which such failure, cessation, or revocation occurred, or any succeeding week thereafter until the week in which the individual begins or resumes participation in a training program that is approved under § 617.22(a).
    - For purposes of this section and other provisions of this Part 617, the following definitions shall be used:



- (A)Failed to begin participation. A worker shall be determined to have failed to begin participation in a training program when the worker fails to attend all scheduled training classes and other training activities in the first week of the training program, without justifiable cause.
- (B)Ceased participation. A worker shall be determined to have ceased participation in a training program when the worker fails to attend all scheduled training classes and other training activities scheduled by the training institution in any week of the training program, without justifiable cause.
- (C)Justifiable cause. For the purposes of paragraph (b)(2) of this section, the term “justifiable cause” means such reasons as would justify an individual's conduct when measured by conduct expected of a reasonable individual in like circumstances, including but not limited to reasons beyond the individual's control and reasons related to the individual's capability to participate in or complete an approved training program.
- (c)Disqualification while in OJT. In no case may an individual receive TRA for any week with respect to which the worker is engaged in on-the-job training.

### **Bi-Weekly Attendance Required for All Training**

Proof of the Customer’s attendance and successful progression through the training program must be documented by the training instructors utilizing **#006a**. The Case Manager should ensure the Customer understands how to complete the form and the importance of submitting attendance every two weeks. If actual Training Provider Signature is not obtained for on-line course and on-line course verification is applicable, participant must complete his/her portion of the **#006a** and attach trackable verification of participation for respective dates listed on the bi-weekly attendance form and must include Student Name and Course Identifier. An email from the instructor indicating the Customer name, the course, the bi-weekly period of attendance and indicate if the Customer is successfully progressing through the listed course and maintaining satisfactory academic standing is acceptable. At the end of the two-week period, the Customer has two (2) business days to submit the **#006a**. All attendance forms must be filed in the Customer file. Case Managers should not issue vouchers for the next semester if there are outstanding **#006a** forms or grades from the previous semester.

With a few exceptions noted below, a **Ceased Participation Status Record** must be entered if the Customer fails to attend all scheduled classes or fails to turn in attendance.

### **Exceptions:**

The Case Manager is not required to enter a Ceased Participation in IWDS for snow days, holidays or breaks scheduled by the school, but they must be indicated on the Bi-Weekly Attendance Sheet as absences. Finals weeks are considered weeks of training. If there is a two-week finals period and all the Customer’s finals are in week one and he/she has no

class or finals during the second week, TRA is payable during the second week since the training institution has not deemed the second week as the start of the break and the Customer is still fulfilling his/her attendance requirements. The Case Manager will begin the **Payable Training Interruption** or **Vacation Break** according to the training institution's schedule.

### **Received Accurate Attendance with no Absences**

If the **#006a** is submitted within two business days and is accurate with no absences, the Case Manager will make the following IWDS entry:

Add a bi-weekly Case Note recording the receipt of the **#006a** sheet with the following naming convention: "Bi-Weekly Attendance Sheets Received *date range*" in the Note Subject Line. The Case Manager will indicate that the sheets were received timely and are accurate with no absences.

### **Ceased Participation**

A **Ceased Participation Status** record must be entered in the following circumstances:

#### **Failed to Provide Verification of Attendance**

If the **#006a** is not submitted in two business days or if submission is **incomplete**, the Case Manager will enter a **Ceased Participation Status Record** indicating that the Customer **Failed to Provide Verification of Attendance**. The Case Manager will add a Case Note with the following naming convention: "Bi-Weekly Attendance Sheets Not Received or Incomplete *date range*" in the Note Subject line explaining the issue. The Case Manager must contact the Customer to obtain the missing/revised **#006a** and record all attempts to obtain in Case Notes. Once the **#006a** sheets/revisions are submitted, another Case Note is entered with the following naming convention: "Bi-Weekly Attendance Sheets Received *date range*" in the Note Subject, detailing receipt for the related period. The **Ceased Participation** will be adjudicated by IDES.

**When the Case Manager does not receive or receives an incomplete DCEO/Trade Form #006a, the Case Manager will make the following entries in IWDS:**

- Select **Ceased Participation Status Record** to create a new **Ceased Participation**.
- Select **Failed to Provide Verification of Attendance** from the drop-down box.
- Enter a dated comment in the **Ceased Participation** Comment Section reflecting no docs or detailing the incomplete components.
- Add a **Case Note** with the following naming convention: "Bi-Weekly Attendance Sheets Not Received or Incomplete *date range*" in the Note Subject Line.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Ceased Participation comments and add a **Case Note** with the outcome and close the record.

**When the Case Manager receives the missing/revised DCEO/Trade Form #006a, the Case Manager will make the following entries in IWDS:**

- Select the related existing **Ceased Participation Status Record**
- Enter a dated comment (Attendance Received and the Date) above the previous comments.
- Upload the **#006a** received and any other supporting documentation to the **Ceased Participation Status Record**.
- Add a **Case Note** with the following naming convention: “Bi-Weekly Attendance Sheets Received *date range*” in the Note Subject Line.
- See Section Below: *Failed to attend any training class and/or other training activity scheduled by the training institution*, as applicable to receipt of the **#006a**.

### **Failed to attend all training class(es) and/or other training activity scheduled by the Training institution**

Once the Customer submits the **#006a** attendance sheets, the Case Manager must review and make sure no scheduled class or training activity was missed. If any scheduled class or training activity was missed, the Case Manager will contact the Customer and find out the reason for the absence and immediately enter a **Ceased Participation Status Record** in IWDS, noting the date of class or training activity absence. The **Ceased Participation** will be adjudicated by IDES.

**The Case Manager will make the following entries in IWDS:**

- Select **Ceased Participation Status Record** to create a new **Ceased Participation**.
- Select **Failed to attend all Training Class(es) or other Training Activity Scheduled** from the drop-down box.
- Enter a dated comment explaining the reason for the absence.
- Upload the **#006a** and all supporting documentation regarding the absence (i.e., doctor note, participant statement, etc.) to the **Ceased Participation Status Record**.
- Add a **Case Note** with the following naming convention: “Bi-Weekly Attendance Sheets Received With Absences *date range*” in the Note Subject Line.
- The **Case Note** must detail the date of the missed class or training activity as well as the reason the Customer provided in the Comment section.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Ceased Participation comments and add a **Case Note** with the outcome and close the record.

### **Instructor Cancelled Class/Classes**

Once the Customer submits the **#006a**, the Case Manager must review. If there are any absences due to the Instructor Cancelled Class/Classes the Case Manager will enter a **Ceased Participation** indicating that the Instructor Cancelled Class/Classes. The Case Manager will add a **Case Note** detailing the date of the cancelled class/classes and the reason if known. The Ceased Participation will be adjudicated by IDES.

### The Case Manager will make the following entries in IWDS:

- Select **Ceased Participation Status Record** to create a new Ceased Participation.
- Select **Instructor Cancelled Class/Classes** from the drop-down box.
- Enter a dated **comment** explaining the reason for the absence.
- Upload the **#006a** and all supporting documentation regarding the absence to the **Ceased Participation Status Record**.
- Add a **Case Note** with the following naming convention: “Bi-Weekly Attendance Received Instructor Cancelled Class/Classes *date range*” with absences in the Note Subject Line.
- The **Case Note** must detail the date of the missed class or training activity as well as the reason the Customer provided in the Comment section.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Ceased Participation comments and add a **Case Note** with the outcome and close the record.

### IDES Adjudication of Ceased Participations

Ceased Participations are transmitted to IDES nightly via the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT. Depending on the paying program and under limited circumstance, benefits may be payable if the Ceased Participation is determined to be for a justifiable cause. The term *justifiable cause* means such reasons as would justify an individual's conduct when measured by conduct expected of a reasonable individual in like circumstances, including, but not limited to reasons beyond the individual's control and reasons related to the individual's capability to participate in or complete an approved training program” 20 CFR § 617.18(b)(2) (11) (C). When considering if the reason was justified or not justified, IDES may consider circumstances which might have been beyond the Customer’s control and the Customer’s capability to continue attending or completing the approved training program including action the Customer took.

Absent an exemption from a work search under section 500C5 of the UI Act, Customers receiving UI are required to conduct a work search. Any denials under Regular UI would be for the day(s) that they missed class only.

The EB work search is required of all Customers not **In Training or Enrolled in Training** to receive BASIC TRA. Additionally, while on BASIC TRA, Customers need to perform an Extended Benefit (EB) work search for any classes that they are not in attendance. The absence will be adjudicated by IDES to determine if justified or unjustified and TRA will be paid or not paid based on that determination. As part of the process of adjudication, if the Customer provides documentation that proves the Ceased Participation is for a justifiable reason, Basic TRA may be payable.

Additional and Completion TRA require participation in the training program to be eligible for TRA payments. Customers therefore are not eligible for TRA payments for any Ceased Participation. Justifiable/unjustifiable cause is not a factor for determining eligibility for Additional and Completion TRA. Customers must attend all scheduled classes/activities to receive payment (20CFR 617.15(b) (3)). If an absence from training is pre-arranged, excused or classes are cancelled by the institution during a period the Customer is receiving Additional and Completion TRA, it may be payable if training can be completed by the planned end date of the training plan or within 130 weeks.

The Case Manager must cooperate with IDES and any request for additional information or IWDS entries.

**All denials for BASIC, Additional and Completion TRA are for the entire week according to 20 CFR § 617.18(b)(2)(i).**

#### **IDES Adjudication Process:**

- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight. IDES staff review the report and enter a ceased participation for the customer in IBIS and enter a 617.18(b)(2)(ii)(B). IDES adjudication staff will hold a hearing on the issue.
- IDES sends the Determination with appeal rights to customer.
- Periodically, the case manager will review the IBIS CLAIMANT ISSUE LIST SCREEN. The “due date” will appear. The Case Manager should check IBIS after that date and update the IWDS Ceased Participation comments and add a **Case Note** with the outcome and close the record.

#### **Process for Customer to Appeal Adjudication**

If the Customer disagrees with the outcome of the IDES Adjudication of the Ceased Participation, he/she can appeal by completing and submitting a request for reconsideration/appeal. A letter will suffice if the agency form is not available. The Customer must file the request with the Illinois Department of Employment Security within thirty (30) calendar days after the date the notice was received. If the last day for filing the request is a day that IDES is closed, the request may be filed on the next day IDES is open. The Customer must mail the request to P.O. Box 19509 Springfield, IL 62794 or fax the request to 217-557-4924. Any request submitted by mail must bear a postmark date within the applicable time limit for filing. If additional information or assistance regarding the appeals process is needed, contact IDES at 217-524-7826. Requests faxed to IDES will be uploaded by staff to the Customer’s record in IBIS.

#### **Case Manager Follow-Up to IDES Adjudication of the Ceased Participation**

The Case Manager will review the IBIS CLAIMANT ISSUE LIST SCREEN, update the IWDS Ceased Participation comments, add a **Case Note** with the outcome and close the record. The Case

Manager must consider the impact of the adjudication outcome and process an IEP revision, if appropriate. Will it impact the training plan? Does it affect the Customer's ability to complete the training on time or at all? Do the Benchmarks need updated?

## Tracking and Reporting the 60 Day Training Benchmark Requirements

Although the Benchmark requirement is explained in the **Form #001 Benefits Rights and Obligations** (BRO), IEP and Training Fact Sheet, prior to the start of training, the Case Manager must discuss the 60 Day Training Benchmark Requirements with the Customer. The Customer's eligibility for Completion TRA is based largely upon the Benchmarks that are recorded in IWDS. Up to 13 weeks of Completion TRA may be payable to assist the Customer in completing a full-time training program that leads to a degree or Industry-Recognized Credential provided that all the 60 Day Benchmarks are met.

The Case Manager must also, prior to a Training program being approved, print out the Training Institution's policy on Full-Time requirements; Academic Standing/Probation policy and the selected Training Program's Curriculum. (The required/elective courses will be entered on the **Trade Form #006d/or Trade Form #006e Trade Training Program Tracking Form.**) These documents must be in the Customer file attached to the training documentation. The Customer and Case Manager must read this information and fully understand what constitutes *full time* and at what point would *failing grades* affect the Customer's eligibility for TRA or being allowed to continue with the program.

To receive the Completion TRA, DOL requires two evaluation criteria to be met every 60 Days:

- **Satisfactory Academic Standing** (based upon passing grades each term, enrolling in the required classes when offered, in the time frame allotted).
- **On Track to Complete Training within the Agreed upon Timeframe** (based upon the Merit Staff approved Planned Training End Date).

The Case Manager and Customer should review these requirements in detail as often as necessary.

The Benchmark Reviews will be conducted at 60-day intervals from the first day of training. Entering more frequent reviews on IWDS will reset the next 60-day review. The next review date will be calculated from the last review date. The 60 Day Benchmark Reviews are recorded in the In-Training Status Record in IWDS under 60 Day Review.

## Information the Case Manager Reviews for Tracking and Reporting the Benchmarks

When determining if the Customer is in **Satisfactory Academic Standing**, the Case Manager will review the **#006a** forms, and any information provided by the Instructor and the Customer. For online courses, if the actual Training Provider Signature is not obtained for on-line course,

participant must complete his/her portion of the **#006a** and attach trackable verification of participation for respective dates listed on the bi-weekly attendance form and must include Student Name and Course Identifier. An email from the instructor indicating the Customer name, the course, the bi-weekly period of attendance and indicate if the Customer is successfully progressing through the listed course and maintaining satisfactory academic standing is acceptable. This Benchmark cannot be accurately recorded without the timely receipt, review and reporting of the **#006a**. In addition to recording the Customer's attendance, the **#006a** form provides space for the Instructor to add any comments or concerns. If a customer is constantly missing classes that generally signals a current or future problem that the Case Manager needs to address immediately. Why are they missing classes? How are missed classes affecting their grades? Instructor comments or concerns must be included in the determination of meeting this Benchmark.

When determining if the Customer is **On Track to Complete Training within the Agreed upon Timeframe**, the Case Manager will document anything that will affect the Customer completing on time. The Case Manager will include information from the **#006a**, **#006d/#006e**, the Institution's full-time and academic policies, and information gathered from monthly reviews. Examples could include dropping or failing a class, the Customer is not accepted into occupational training after completing pre-requisites, or early training completion.

### **Additional Benchmark Reviews at End of Each Term**

Upon receipt of the Customer's grades and new class schedule, the Case Manager must enter two additional Benchmark reviews in IWDS at the end of each training term (quarter/semester).

The reason for the first additional Benchmark review is to determine if those grades are passing and the Customer is meeting Satisfactory Academic Standing. Throughout the term it may look as if the Customer is progressing through the class successfully. However, upon completion and once the Customer receives his/her grades, if the class was failed or not completed, this generally changes the outcome of the Benchmark and may require an IEP revision to the Customer's training plan.

The reason for the second additional Benchmark review is to determine, based upon the next class schedule, if the Customer is On Track to Complete Training within the Agreed upon Timeframe. Sometimes the training institution only offers classes at select times or classes may fill up and may not be available to the Customer. If the Customer cannot get the necessary classes, it may cause the Customer to fall behind and may require an IEP revision to the Customer's training plan, if possible.

### **The Case Manager will make the following entries in IWDS:**

- To complete the 60-Day Training Benchmark review process, select **List TAA Status** and then will select **View** for the **In Training** record.

- Select the **60 Day Review button**. Select the **Add 60 Day Review**. The Case Manager will add the Review Date and select the **Review Type** (either Academic Standing or On Track to Complete Training Within Timeframe).
- Select the **Outcome**, enter relevant Comments as to the status of the review and either click on Save if finished adding both Benchmark reviews or click on **Save, Add Another** to repeat the process to add the 2<sup>nd</sup> Benchmark review.

### **Benchmark Outcome Choices Include:**

**Satisfactory** means the Customer is taking all the classes needed, earning passing grades for the program, has no attendance issues and is on schedule to complete.

**Not Met – Warning** requires the **Trade Form #006c Trade Program Training Program Benchmark Warning Letter** be sent to the Customer. The date the Training Benchmark Warning Letter is mailed must be recorded in the Comments box. This outcome is a result of the Customer missing classes, not earning passing grades for the program, or is not on schedule to complete.

**Not Met – Modification** requires an in-person meeting with the Customer to modify the training plan if possible. Indicate the reason why the modification is necessary in the Comments box. A modification could be required due to a Customer failing a class, because the Customer isn't getting the required classes in a timely manner, or for other reasons. Follow the IEP Revision process to obtain State Merit Staff approval.

**Not Met – No Completion TRA** is selected if a modification to the training plan is not feasible. This also requires the entry of a **Potential Suspension Request** utilizing the reason of **Not Met – No Completion TRA**. The Case Manager must send the **#003c** to the Customer. This is the only **Potential Suspension Request** that requires State Merit Staff Approval. IDES will be notified of the **Potential Suspension Request** status. IDES will make the final determination if the Customer meets the qualifying requirements for Completion TRA. The Customer can appeal this decision.

### **Potential Suspension Requests**

There are certain requirements to qualify for and maintain Trade and TRA benefits. Non-compliance with any of the requirements of these program benefits may result in revocation or suspension of UI/TRA benefits and/or TAA services suspended or revoked. However, before the suspension of benefits process begins, the Customer must have a reasonable opportunity and timeframe to produce any requested documentation.

The Case Manager will use the suspension process to notify the Customer and IDES of potential ineligibility for UI/TRA benefits and/or Trade services for Customers determined to be noncompliant with Trade requirements. Prior to taking any action regarding suspension or revocation of benefits, the Customer must receive written notification through the **Commerce/Trade Form #003c Trade Potential Suspension Letter (#003c)**. The following



outlines the conditions under which there can be a suspension or revocation of benefits and/or services.

## **Suspension Conditions**

The following conditions will dictate when suspension of benefits may be necessary:

- Refused Suitable Employment
- Enrolled in training, failed to start
- In training, ceased participation (dropped below full-time, quit)
- Failure to meet qualifying requirements for TRA/TAA
- Non-compliant with TAA training requirements
- Benchmarks Not Met – No Completion TRA

## **Refused Suitable Employment**

A Customer must actively search for work. He/She may refuse any employment if they meet the Trade definition of Enrolled in Training or are attending Trade approved training. However, any Customer who does not meet the Enrolled in Training definition and refuses suitable employment (80% of the pre-layoff wage at an equal or higher skill level) when the paying program is UI or Basic TRA, may be disqualified from receiving UI/Basic TRA until reemployed for a period of at least 4 weeks in which they earn at least 1 times the weekly benefit amount in each of the 4 weeks. The Potential Suspension will be adjudicated by IDES.

## **If Customer has not been determined eligible for Enrollment in Training or a Waiver and Refused Suitable Employment:**

The Case Manager will make the following entries in IWDS:

- Select **Potential Suspension Request Status Record** from the Maintain TAA Status Screen.
- Select **Refused Suitable Employment** from the drop-down box.
- Enter a dated **comment** explaining the reason for the Potential Suspension Request.
- Upload to the PSR record any supporting documentation regarding the Potential Suspension Request including the **#003c to the PSR Status Record**.
- Add a **Case Note** detailing the date and the circumstances of the Potential Suspension Request.
- Update the **IEP Status** record comment section.
- Update the paper **IEP #014** and request State Merit Staff approval.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Ceased Participation comments and add a **Case Note** with the outcome and close the record.

## If Customer is on a Waiver from the Training Requirement and Refused Suitable Employment:

### The Case Manager will make the following entries in IWDS:

- Select **Potential Suspension Request Status Record** from the Maintain TAA Status Screen.
- Select **Refused Suitable Employment** from the drop-down box.
- Enter a dated **comment** explaining the reason for the Potential Suspension Request.
- Upload to the PSR record any supporting documentation regarding the Potential Suspension Request including the **#003c to the PSR Status Record**.
- Add a **Case Note** detailing the date and the circumstances of the Potential Suspension Request.
- Update the **IEP Status** record comment section.
- Update the paper **IEP #014** and request State Merit Staff approval.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Ceased Participation comments and add a **Case Note** with the outcome and close the record.

If IDES' investigation results in a determination of "Allowed", the Waiver will continue; if determination is "Denied", the Case Manager will revoke the Waiver. (See Waiver Chapter) The Customer can appeal the decision.

### Enrolled in Training, Failed to Start

If a Customer meets the definition of Enrolled in Trade Approved Training and fails to start, UI/TRA benefits may be impacted. There are several reasons a Customer may fail to start a training program as scheduled. Failed to Start may be beyond the Customer's control due to the school cancelling the program or classes, a change in the program start date or for personal reasons. The Potential Suspension Request will be adjudicated by IDES.

### The Case Manager will make the following entries in IWDS:

- Select **Potential Suspension Request Status Record** from the Maintain TAA Status Screen.
- Select **Enrolled in Training, Failed to Start** from the drop-down box.
- Enter a dated **comment** explaining the reason for the Potential Suspension Request.
- Upload any supporting documentation regarding the Potential Suspension Request including the **#003c to the PSR Status Record**.
- Add a **Case Note** detailing the date and the circumstances of the Potential Suspension Request.
- **End the Training Service** record(s) as Unsuccessful Completion on the date it was supposed to begin.

- **End the Travel and/or Subsistence** Service record(s) as Unsuccessful Completion on the date it was supposed to begin.
- Update the **IEP Status** record comment section.
- Update the paper **IEP #014** and request State Merit Staff approval.
- The Case Manager may be required to complete new Trade forms and new IWDS Service and Status records if the Customer's training plan changes.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Potential Suspension Request comments and add a **Case Note** with the outcome and close the record.

If IDES' investigation results in a determination of "Allowed", the Case Manager must meet with the Customer to revise the Training Plan (See Training Chapter) if determination is "Denied", the Case Manager will enter a Case Note and the Customer will not be allowed to continue with Trade training. The Customer can Appeal the decision.

### **In training, ceased participation (dropped below full-time, quit)**

A Customer shall be determined to have ceased participation when the Customer drops below full-time or when the Customer quits training. If the Customer drops below full-time and can still complete training in the allowable training weeks, the Customer can continue training but will not receive TRA benefits until the Customer resumes full-time training. If the Customer quits training and it is deemed justified by IDES, he/she may be able to resume the same training plan later. This includes Returned to Work. The Case Manager must update the #006d/#006e, as applicable

### **If the Customer drops below full-time training status.**

**The Case Manager will make the following entries in IWDS:**

- Select **Potential Suspension Request Status Record** from the Maintain TAA Status Screen.
- Select **In training, ceased participation (dropped below full-time, quit)** from the drop-down box.
- Enter a dated **comment** explaining the reason for the Potential Suspension Request.
- Upload any supporting documentation regarding the Potential Suspension Request including the **#003c to the PSR Status Record**.
- Add a **Case Note** detailing the date and the circumstances of the Potential Suspension Request.
- Create a **Part Time/Distance** record with the indicator set to Yes under List Part Time/Distance Learning link on IWDS with the effective date.
- Update the **IEP Status** record comment section.
- Update the paper **IEP #014** and request State Merit Staff approval.

- Add Training **Benchmarks** to reflect the Part Time status.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Potential Suspension Request comments and add a **Case Note** with the outcome and close the record.

**Exception to the above IWDS entries: In his/her last semester, the Customer can attend training part-time if the file has documentation from the training provider that the Customer is in the last semester and is on track to complete on time. The Case Manager still must update the paper IEP #014, add a case note and submit for State Merit Staff approval.**

### **In Training, Ceased Participation (Quit)**

**The Case Manager will make the following entries in IWDS:**

- Select **Potential Suspension Request Status Record** from the Maintain TAA Status Screen.
- Select **In training, ceased participation (dropped below full-time, quit)** from the drop-down box.
- Enter a dated **comment** explaining the reason for the Potential Suspension Request
- Upload any supporting documentation regarding the Potential Suspension Request including the **#003c to the PSR Status Record**.
- Add a **Case Note** detailing the date and the circumstances of the Potential Suspension Request.
- End the **Training Service** record(s) as unsuccessful completion on the date of last documented attendance.
- End the **Travel and/or Subsistence** Service record(s) as successful completion on the date of last documented attendance.
- Add training **Benchmarks** to reflect the cessation of training.
- Update the **IEP Status** record comment section.
- Update the paper **IEP #014** and request State Merit Staff approval.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Potential Suspension Request comments and add a **Case Note** with the outcome and close the record.

If IDES' investigation results in a determination of "Allowed", and the Customer wants to resume the same training later, the Case Manager will work with the Customer to update the training plan. (See Chapter 10 Trade Funded Training). If determination is "Denied", the

Customer will not be entitled to resume training. If the Customer insists on training, he/she must be denied in writing with appeal rights. State Merit Staff must approve the denial language. The Customer can appeal the decision.

### **Failure to Meet Qualifying Requirements for TRA/TAA**

If discovered during monitoring or otherwise, that a Customer did not meet one of the qualifying requirements for TRA/TAA, enter a Potential Suspension Request. For cases of alleged Fraud refer to the Chapter on Fraud.

Failure to meet qualifying requirements for TRA/TAA may include one of the following reasons:

- Was not part of the certified worker group
- No Qualifying Separation
- Missed 26/26 – extenuating circumstances not appropriate
- Training was not Trade Approvable
- Other

**The Case Manager will make the following entries in IWDS:**

- Select **Potential Suspension Request Status Record** from the Maintain TAA Status Screen.
- Select **Failure to Meet Qualifying Requirements for TRA/TAA** from the drop-down box.
- Enter a dated **comment** explaining the reason for the Potential Suspension Request.
- Upload any supporting documentation regarding the Potential Suspension Request including the **#003c to the PSR Status Record**.
- Add a **Case Note** detailing the date and the circumstances of the Potential Suspension Request.
- Update the **IEP Status** record comment section.
- Update the paper **IEP #014** and request State Merit Staff approval.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Potential Suspension Request comments and add a **Case Note** with the outcome and close the record.

### **If IDES confirms that the Customer did not meet the Qualifying Requirements for TRA/TAA**

- The Case Manager will update the **Potential Suspension Request Status Record** with the outcome.
- **End all Service and Status** record(s) as unsuccessful as of the date of IDES determination.
- Add a **Case Note** detailing the IDES determination.
- Update the **IEP Status** record comment section.
- Update the paper **IEP #014** and request State Merit Staff Approval.

- The Case Manager will follow the internal LWIA process for deobligation of funds and training/travel overpayments and refer the Customer to WIOA services.

### **If IDES confirms that the Customer did meet the Qualifying Requirements for TRA/TAA**

- Update the **Potential Suspension Request Status Record** with the outcome.
- Add a **Case Note** detailing IDES determination.
- The Case Manager will resume working with the Customer.

### **Benchmarks Not Met – No Completion TRA**

The Case Manager will select this Potential Suspension Request reason when the Customer has failed two Benchmarks and a revision to the training plan is not feasible. This is the only Potential Suspension Reason that triggers a State Merit Staff Approval automatically in IWDS. If Merit Staff approves, the Potential Suspension Request status will be sent to IDES. Prior to taking any action, IDES will confirm with the Case Manager that the Benchmarks are accurate and current. A Completion TRA Application must be submitted to IDES for a determination.

### **The Case Manager will make the following entries in IWDS:**

- Select **Potential Suspension Request Status Record** from the Maintain TAA Status Screen.
- Select **Benchmarks Not Met-No Completion TRA** from the drop-down box.
- Enter a dated **comment** explaining the reason for the Potential Suspension Request.
- Upload any supporting documentation regarding the Potential Suspension Request including the **#003c to the PSR Status Record**.
- Add a **Case Note** detailing the date and the circumstances of the Potential Suspension Request.
- Update the **IEP Status** record comment section.
- Update the paper **IEP #014** and request State Merit Staff approval.
- Following the Case Manager IWDS entries, the POTENTIAL TRA TRAINING/WAIVER FILE MAINTENANCE REPORT is transmitted to IDES overnight.
- Periodically, review the IBIS CLAIMANT ISSUE LIST SCREEN and update the IWDS Potential Suspension Request comments and add a **Case Note** with the outcome and close the record.

**If IDES Confirms that the Customer did not Meet the Benchmarks and is not eligible for Completion TRA. NOTE:** IDES will not adjudicate this issue until the Customer has exhausted Additional TRA and a Completion TRA application has been submitted.

- Update the **Potential Suspension Request Status Record** with the outcome.
- Add a **Case Note** detailing the IDES determination.

- The Customer must provide the Case Manager signed document that demonstrates they have the financial means to support themselves to complete the training. The Customer can continue with training.
- If the Customer cannot demonstrate they have the financial means to support themselves to complete the training, the training must end upon the IDES determination. In IWDS, the Case Manager will:
  - **End all Service and Status** record(s) as unsuccessful completion as of the date of IDES determination.
  - Add a **Case Note** detailing the IDES determination and the Customer does not have the financial means to continue training.
  - Update the **IEP Status record** comment section.
  - Update the paper **IEP #014** and request State Merit Staff approval.

**If IDES confirms that the Customer Met the Benchmarks and is eligible for Completion TRA. NOTE:** IDES will not adjudicate this issue until the Customer has exhausted Additional TRA and a Completion TRA application has been submitted. In IWDS, the Case Manager will:

- Update the **Potential Suspension Request Status Record** with the outcome.
- Add a **Case Note** detailing the IDES determination.

**Process for Customer to Appeal Adjudication**

If the Customer disagrees with the outcome of the IDES Adjudication of the Ceased Participation, he/she can appeal by completing and submitting a request for reconsideration/appeal. A letter will suffice if the agency form is not available. The Customer must file the request with the Illinois Department of Employment Security within thirty (30) calendar days after the date the notice was received. If the last day for filing the request is a day that IDES is closed, the request may be filed on the next day IDES is open. The Customer must mail the request to P.O. Box 19509 Springfield, IL 62794 or fax the request to 217-557-4924. Any request submitted by mail must bear a postmark date within the applicable time limit for filing. If additional information or assistance regarding the appeals process is needed, contact IDES at 217-524-7826. Requests faxed to IDES will be uploaded by staff to the Customer's record in IBIS.