Frequently Asked Questions: Reporting TRA and A/RTAA Benefits in PIRL

TRA and A/RTAA Overview

Q1: *What is TRA?*

ANSWER: As its name implies, Trade Readjustment Allowances (TRA) is specific to the TAA Program. TRA provides income support available in the form of weekly cash payments to adversely affected workers (AAWs) who are enrolled in a full-time training course and have exhausted their unemployment insurance (UI). The amount of each weekly TRA payment is based on the weekly UI benefit previously received.

Under the current TAA statute (the Trade Adjustment Assistance Reauthorization Act of 2015, or TAARA 2015) and under the previous amendments (Trade Adjustment Assistance Extension Act of 2011, or TAAEA), participants may be eligible for Basic, Additional, and Completion TRA[1]. Participants who are served under the Trade and Globalization Adjustment Assistance Act of 2009 (or TGAAA) are eligible for Basic, Additional, and Remedial/Prerequisite TRA. For more information on Basic, Additional, and Completion TRA categories, see the TAA website. For more information on Remedial/Prerequisite TRA, see the 2009 TAA Program benefits and services page.

Q2: *What is A/RTAA?*

ANSWER: This TAA Program benefit is a wage supplement for up to two years that is available to reemployed workers age 50 and older and covers a portion of the difference between a worker's new age and their old wage (up to a specified maximum amount). A/RTAA signifies two different benefits, Alternative Trade Adjustment Assistance or ATAA (enacted under the 2002 Program), or Reemployment Trade Adjustment Assistance (enacted under the 2009 Program and reauthorized under the 2011 and 2015 Programs). As is the case for TRA categories, eligibility for ATAA or RTAA is dependent on which version of the TAA Program the worker is covered under, which can be determined by the petition number of the certification of their worker group. A chart to assist is located on the TAA website here: https://www.doleta.gov/tradeact/pdf/benefit_serv_by_ta_w_number.pdf.

ATAA and RTAA have different eligibility requirements and flexibilities, but PIRL uses the same data elements because a participant would only be able to receive one or the other. For more information on these benefits, see the side by side comparison chart here: https://www.doleta.gov/tradeact/pdf/side-by-side.pdf, and to view benefits available under different versions of the TAA Program, see here: https://www.doleta.gov/tradeact/benefits/

[1] This benefit provision was first authorized under the Trade Adjustment Assistance Extension Act of 2011, and applies to participants who received a qualifying separation during the time that this law was in effect.

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First Benefit Dates

Q1: *Where does one document the date on which a benefit was first received?*

ANSWER: When a participant begins receiving a TRA or A/RTAA benefit, the date of the first receipt must be recorded in PIRL. Each type of TRA is documented separately. TAA elements for Date Received First (Benefit) are listed in the table below.

Benefit	Date Received First (Benefit)
Basic TRA	PIRL 1511
Additional TRA	PIRL 1516
Remedial/Prerequisite TRA	PIRL 1521
Completion TRA	PIRL 1526
A/RTAA	PIRL 1534

Any Date Received First (Benefit) must be:

- *on* or *after* the Date of First TAA Benefit or Service (PIRL 925) and
- *on* or *before* the Date of Program Exit (PIRL 901).

Q2: *What are date elements for Date Received First (Benefit) used for?*

ANSWER: These dates allow the Department to determine who started receiving a particular benefit in a given timeframe. This information is most often used for determining benefit take up rates that are used in modeling TRA and A/RTAA budget projections. Additionally, we use this information for determining how rapidly participants are receiving benefits and when those benefits start in relation to other benefits and services.

Q3: *If the participant received the benefit during a previous participation, do we document these dates in a participant record for a current period of participation?*

ANSWER: No. All benefit information within a participant record should be specific to the respective period of participation and not include any benefit information from previous periods of participation. As such, all dates for Date Received First (Benefit) should be between the Date of First TAA Benefit or Service (PIRL 925) and Date of Program Exit (PIRL 901), inclusively.

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TRA, A/RTAA, and Triggering/Exiting Participation

Q1: *Should issuing a TRA or A/RTAA payment trigger participation?*

ANSWER: In most cases, yes, issuance of TRA and A/RTAA payments trigger TAA participation. TRA and A/RTAA payments should occur on or after the date reported for Date of First TAA Benefit or Service (PIRL 925) in a participant record. An exception to this can occur if a Date of Program Exit is reported for a participant, and then a payment is issued after that event. See relevant Q and A below for more details.

Q2: *Does issuing TRA and A/RTAA payments extend exit?*

Yes. As it is with all TAA benefits and services, issuance of TAA benefits extends exit, in keeping with rule for reporting Date of Program Exit in PIRL, after 90 days of no service or scheduled future service. This would include issuance of:

- "real time" payments (such as those that are issued in short order following a claim, or weeks that serve as the basis for eligibility), and
- payments that are issued as the result of a denied claim that was subsequently awarded as the result of a successful appeal, or other retroactive correction.

Q3: *What if an individual is issued a TRA payment after Date of Program Exit is reported? How do I report that?*

ANSWER: This occurs in situations where one or more TRA payments is subject to a correction of some type. Most often, it is awarded to an individual where:

- a TRA claim is denied during participation, and then
- subsequently awarded following a successful appeal.

In this situation, where the payment is issued after Date of Program Exit is reported, but is based on weeks of eligibility that occurred during participation, issuance of such a TRA payment should not be reported in PIRL. Issuance of such a TRA payment does not correspond to participation for reporting purposes.

Q4: *What if a participant is issued an A/RTAA payment after Date of Program Exit is reported? How do I report that?*

ANSWER: If an A/RTAA payment is issued after a Date of Program Exit, and based on an appeal of a denied claim, or is a correction of a payment that was made during participation, then (as is described above for TRA) it should not be reported.

However, A/RTAA payments *must* trigger participation if it based on a claim that is submitted after the Date of Program Exit is reported. Note that A/RTAA is paid based on employment that has already occurred; therefore, the benefit eligibility is premised on activity that took place in the past. As a result, if an individual applies for A/RTAA after the Date of Program Exit is reported, and is issued at least one A/RTAA payment as a result of that claim, a new participation record must be created, with a Date of First TAA Benefit or Service that correspond with the date that the A/RTAA payment is issued.

Participants with more than one period of participation may be reported in PIRL as separate lines. These participations may not overlap or be within 90 days of each other. See WIPS Duplicate rules at https://doleta.gov/performance/wips/docs/Duplicate_Rules.pdf.

Q5: *If TRA payments after exit are not reported in PIRL, wouldn't that cause PIRL expenditures to misalign with ETA-9130(M) expenditures?*
ANSWER: Yes. Such TRA payments that occur after exit may cause reported PIRL expenditures to be lower than expenditures reported on the ETA-9130. However, these payments are typically rare. As such, it is unlikely to cause misalignment of 15% or more: the threshold for flagging a discrepancy in TAA Data Integrity (TAADI). In addition, states that fail to meet the target for the TRA expenditure measure may provide an explanation in the quarterly narrative section of the TAADI report card. If the state believes that such post exit payments comprise a valid justification for making a statistically significant discrepancy, it is recommended that it include specificity as to the number of participants affected, and the associated dollar amounts that would contribute to the relevant discrepancy.

Q4: *Can't I just remove the Date of Program Exit (PIRL 901) and apply a new exit date, if in fact the participant is issued a benefit for the same certification, as reflected in the Petition Number (PIRL 915)?*
ANSWER: No. Once it is reported in a participant record, an exit date must not be removed. This is true for participant reporting on TAA Program, as well as all other programs that report through participant records in PIRL.

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Quarterly and Total Expenditures

Q1: *What is the difference between quarterly and total expenditures?*

ANSWER: The PIRL collects information on both quarterly and total expenditures for each benefit. The total expenditures report the expenditures accrued across the entire participation. The quarterly expenditures report only those expenditures accrued in the particular report quarter. While TRA and A/RTAA benefits typically accrue very close in time to when funds are disbursed, it is still important that all expenditures be reported on an accrual basis, matching the accounting methodology used in ETA-9130 reporting.

Benefit	Quarterly Expenditures	Total Expenditures
Basic TRA	PIRL 1514	PIRL 1515
Additional TRA	PIRL 1519	PIRL 1520
Remedial/Prerequisite TRA	PIRL 1524	PIRL 1525
Completion TRA	PIRL 1529	PIRL 1530
A/RTAA	PIRL 1536	PIRL 1538

Q2: *Do PIRL data elements for TAA expenditures reflect reporting for only one grant?*

ANSWER: No. Because periods of participation for TAA participants often span more than one fiscal year, Total Expenditures for a specific benefit or service in a participant record may represent expenditures accrued against a number of different grants. However, because both the PIRL and ETA-9130 are based on accrual accounting, quarterly expenditures accrued should all be reported on the grant active during that quarter.

Q3: *How are corrections or adjustments to accrued expenditures reported in PIRL?*

ANSWER: Adjustments and corrections to expenditures that occur during the same quarter are simply reported normally. In some cases, expenditures accrued in a previous quarter or even on a previous grant may need to be adjusted. For example, a participant receives TRA in FY 2018 Q4 in the amount of $250. In FY 2019 Q1, it is determined that the correct accrual amount was $300. Because that accrual occurred in FY 2018 Q4, the total expenditures should be adjusted to reflect the corrected amount. However, this change does not affect the quarterly accrued expenditures since that accrual did not occur in the current quarter.

Q4: *TRA benefits were accrued against the FY 2018 grant in the closeout period during FY 2019. How are those reported?*

ANSWER: This is a common question, but demonstrates some misunderstanding. If the expenditure is an adjustment to a benefit that accrued in FY 2018, then it should be reported as described in Q3 above. However, if new accruals are occurring in FY 2019, they cannot properly be attributed to the inactive FY 2018 grant. The closeout period allows for adjustments to be recorded and payments to be made on accrued expenditures but does not extend the period of the grant. TRA benefits accrued or paid in FY 2019 must be reported against the FY 2019 TRA grant.

Q4: *Aren't there circumstances where the quarterly amounts in PIRL and the ETA-9130 will not agree?*
ANSWER: Rarely. There are two circumstances where TRA amounts cannot be different between PIRL and the ETA-9130:

1. When benefit payments are issued after a Date of Program Exit is reported in PIRL, and are therefore not reported.
2. When corrected ETA-9130 forms are not required to be submitted. To determine quarterly accrued expenditures from the ETA-9130, the previous quarter total accrued expenditures is subtracted from the current quarter total accrued expenditures. When adjustments and corrections are needed, however, this results in a quarterly amount that is overstated or understated by the amount of the correction or adjustment. It should be noted that this will never affect Q1 results because the adjustment is occurring on a now inactive grant. If state wishes to prevent such an error, they can optionally resubmit a corrected previous ETA-9130 to ensure that the calculated quarterly change is reflective of the quarterly expenditures. Additionally, these two scenarios are why TAADI allows for a 15 percent discrepancy between PIRL and ETA-9130 amounts.

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Tracking Ongoing Participation and Duration: TRA Weeks and A/RTAA Payments

Q1: *Why is TRA tracked in weeks?*

ANSWER: TRA is provided in fixed monetary amounts based on a fixed week of eligibility, much like Unemployment Insurance. In addition, unlike training, TRA is not tracked off of a start and end date. In part, this is because eligibility for TRA is often contingent on provision of training – if such activity has breaks or interruptions, TRA eligibility may cease and resume in tandem with training provisions.

Q2: *Why is A/RTAA tracked in number of payments?*

ANSWER: A/RTAA eligibility is a wage supplement that is contingent on employment. Eligible TAA workers must apply for ATAA and RTAA based on documentation of existing, or previous, employment. Unlike TRA, workers may apply for A/RTAA based on employment activity that may have occurred many weeks or months previously. In this way, an ATAA or RTAA recipient may apply for benefits based on several months of employment. In turn, states may opt to provide those currently employed with this benefit at increments such as weekly, bi-monthly, or monthly – this is allowed to be set at the state's discretion.

Q2: *What are the PIRL elements for TRA weeks and A/RTAA payments?*

ANSWER: The PIRL collects information on both quarterly and total weeks paid for each TRA benefit. The cumulative element reports weeks paid throughout the participation. The quarterly expenditures report only those weeks paid in the particular report quarter.

A/RTAA payments are reflected by quarterly and cumulative counts, with quarterly counts corresponding to activity within the report quarter, and cumulative counts to reflect the entirety of participation.

Benefit (Increment)	Quarterly	Cumulative
Basic TRA (Weeks)	PIRL 1512	PIRL 1513
Additional TRA (Weeks)	PIRL 1517	PIRL 1518
Remedial/Prerequisite TRA (Weeks)	PIRL 1522	PIRL 1523
Completion TRA (Weeks)	PIRL 1527	PIRL 1528
A/RTAA	PIRL 1535	PIRL 1537

Q3: *What are TRA weeks used for? What are A/RTAA payment counts used for?*

ANSWER: TRA weeks are a central element to TRA reporting. Reporting of TRA weeks is used to determine TRA activity both in the quarter, and annually for meeting statutory reporting requirements. Furthermore, because of statutory limits on the number of weeks TRA is paid, this reporting allows us to ensure benefits are being properly attributed to the correct type and within the program-specific limits. We also use this information to determine how much of the benefit is being utilized. Last, this information is valuable in developing projections for future year budget requests.

Because A/RTAA payments are not fixed in either amount or volume, its uses are not as varied as TRA. A/RTAA quarterly payments are especially important in tracking A/RTAA activity over time and for meeting statutory reporting requirements that are published in the TAA Annual Report to Congress.

Q3: *Can the number of TRA weeks paid exceed the number of weeks in the quarter?*
ANSWER: Yes, the number TRA Quarterly Weeks reported can exceed the number of weeks in an actual report quarter (generally 13). There are a number of reasons for this, including payments on weeks that were previously denied, but subsequently awarded on appeal, delays getting proper documentation of eligibility, and processing delays.

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Overpayments

Q1: *What is a TRA or A/RTAA overpayment?*

ANSWER: An overpayment occurs when TRA or A/RTAA payments are either improperly paid (such as to an ineligible person) or the amount paid is incorrect. Depending on the circumstances of overpayment, there may be a requirement to recapture overpayments.

Q2: *What PIRL elements are used to report a TRA overpayment?*

ANSWER: TRA overpayments are reported in PIRL 1531 through PIRL 1533. The reporting of TRA overpayments is not specific to the particular type of TRA. When an overpayment occurs, TRA Overpayment (PIRL 1531) should be set to 1 (Yes). Once an overpayment occurs, this element should remain 1 for all subsequent reporting quarters for that participation even if the overpayment was recaptured. The amount of the overpayment should be reported in Amount of TRA Overpayment (PIRL 1532). The amount reported should be the amount of all overpayments even if the funds were recaptured. If a waiver was issued for an overpayment (i.e. recapture is not necessary), TRA Overpayment Waiver (PIRL 1533) should be reported as 1 (Yes) for that and all subsequent quarters.

Q3: *What PIRL elements are used to report an A/RTAA overpayment?*

ANSWER: A/RTAA overpayments are reported in PIRL 1541 through PIRL 1543. When an overpayment occurs, A/RTAA Overpayment Current Quarter (PIRL 1541) should be set to 1 (Yes). The current item definition indicates 1 should only be reported in the current quarter. However, we are currently working to change this definition to match TRA Overpayment (PIRL 1531). Once an overpayment occurs, this element should remain 1 for all subsequent reporting quarters for that participation even if the overpayment was recaptured. The amount of the overpayment should be reported in Amount of A/RTAA Overpayment (PIRL 1542). The amount reported should be the amount of all overpayments even if the funds were recaptured. If a waiver was issued for an overpayment (i.e. recapture is not necessary), A/RTAA Overpayment Waiver (PIRL 1543) should be reported as 1 (Yes) for that and all subsequent quarters.

Q4: *What is overpayment data used for?*

ANSWER: The Department is periodically audited to determine the rate of overpayments for various benefits. This includes quantifying both the probability and amount of overpayments. We also determine how often those overpayments are recaptured. This collection allows us to meet those audit requirements.