

## Frequently asked Questions: Reporting Agent and Liable TAA Participants

### Reporting on Participants Served by Both Liable and Agent States

**Q1:** *What is the difference between a Liable State and an Agent State?*

**ANSWER:** The definition of Liable and Agent State can be found in 20 CFR 618.110. The Agent/Liable status is reported in TAA Liable/Agent State Identifier (PIRL 926). In most cases, a single state will serve the participant, in which case the correct coding is 0=Both in TAA Liable/Agent State Identifier (PIRL 926). This FAQ deals with scenarios where two or more states serve a TAA participant within a single participation period whereby, depending on the reporting state's role in serving the participant, it would report either 1=Liable State, or 2=Agent State. Note that the term "Liable State" is used to describe participant reporting for the Liable State when an Agent State is also servicing the TAA participant.

In general terms, a Liable State is responsible for the administration of all program benefits including all determinations of TAA participant benefit eligibility, as well as provision of TRA and A/RTAA. The Agent State provides direct services, such as case management and reemployment services, and facilitates the provision of benefits between the Liable State and the TAA participant.

**Q2:** *Is the Agent State or the Liable State responsible for reporting the participant in PIRL?*

**ANSWER:** Both. Generally speaking, where the Agent/Liable dynamic applies, both states are responsible for reporting a full and complete record, including the provision of all benefits and services (see Q3), except:

- The Agent State is not required to report TRA and A/RTAA benefits.

The Liable State should provide all information with regard to participant activity, which will allow for calculation of cost per participant.

**Q3:** *Which state is responsible for reporting other PIRL information such as training?*

**ANSWER:** Both states are responsible for reporting all applicable participant data in PIRL, except as noted in Q2. Both states should report information such as demographics, Rapid Response, training information, case management, waivers, the provision of job search and relocation, and participant outcomes. Both the Liable State and the Agent State must coordinate benefits to make sure that participants are being properly served and be able to report a complete trajectory of a participant's benefits and services.

**Q4:** *How does the Agent/Liable dynamic relate to reporting ETA-Assigned 1<sup>st</sup>/2<sup>nd</sup>/3<sup>rd</sup> Local Workforce Board Code (PIRL 108-A/B/C)?*

**ANSWER:** The Agent/Liable dynamic is unique to the TAA Program. If the reporting state's role is Agent, with TAA Liable/Agent State Identifier (PIRL 926) reported as zero (both) or two (agent only), then ETA-Assigned Local Workforce Board Code (PIRL 108-A/B/C) must be either a local workforce board code or the state-level code. If the reporting state's role is Liable-only, with TAA Liable/Agent State Identifier (PIRL 926) reported as one (liable only), then at least one of ETA-Assigned Local Workforce Board Code (PIRL 108-A/B/C) must be '99999', in line with the PIRL description(s). When the state's role in TAA is liable-only but the state has an active role in another ETA workforce program serving the participant, then two workforce board codes must be reported: '99999' and the valid local or state-level board code.

## Frequently asked Questions: Reporting Agent and Liable TAA Participants

**Q5:** *May Agent states pay for TRA and A/RTAA?*

**ANSWER:** No. The definition of Liable State is based on the responsibility for TRA and A/RTAA expenditures.

**Q6:** *May Liable states pay for training, job search, and relocation?*

**ANSWER:** No. The TAA Program regulations, in 20 CFR 618.824, establish that the Agent State accrues expenditures for training, job search, and relocation. Note, there is no mechanism for states to transfer TAA funds to one another. Any payment made must be directly to a participant or training provider. Any arrangement between states regarding payment must be documented in the participant's case file.

**Q7:** *What expenditures accrue to the Agent State and which to the Liable State?*

**ANSWER:** In most cases, a participant record reflects activity by a single state. Where two or more states are involved in serving the participant, the Agent state provides Training, Job Search, and Relocation, and therefore must report expenditures for those activities. The Liable State must provide (and subsequently report on) TRA and A/RTAA benefits, in addition to reporting on benefits provided by the Agent State. See additional details in Attachment II of [TEGL 18-20](#): TAA Financial Reporting Alignment and Clarifications.

<u>Expenditure Type</u>	PIRL Expenditure Elements	Provided By (Reported in 9130)	Reported in Agent State PIRL	Reported in Liable State PIRL
Training	PIRL 1324 PIRL 1325	Agent State	Required	Required
Job Search	PIRL 1506 PIRL 1507	Agent State	Required	Required
Relocation	PIRL 1509 PIRL 1510	Agent State	Required	Required
Basic TRA	PIRL 1514 PIRL 1515	Liable State	Optional	Required
Additional TRA	PIRL 1519 PIRL 1520	Liable State	Optional	Required
Remedial / Prerequisite TRA	PIRL 1524 PIRL 1525	Liable State	Optional	Required
Completion TRA	PIRL 1529 PIRL 1530	Liable State	Optional	Required
A/RTAA	PIRL 1536 PIRL 1538	Liable State	Optional	Required

## Frequently asked Questions: Reporting Agent and Liable TAA Participants

**Q87:** *How about Case management and administrative expenditures? How are these handled in this context?*

**ANSWER:** Case management and administrative expenditures may be incurred by both Agent and Liable States (for participation involving two or more states), as well of course as part of a participation that involves only one state. ETA-9130 reports include only expenditures accrued against a state's own grants for these costs. These expenditures are not reported in the PIRL.

**Q9:** *Will reporting another state's accrued expenditures cause a discrepancy on TAADI expenditure measures?*

**ANSWER:** TAADI expenditure calculations were modified in FY 2019 to ensure that expenditures reported by the submitting state but provided by another state do not create a discrepancy between the PIRL and the ETA-9130 report. The Training Expenditures measure and the Job Search and Relocation measure will consider expenditures reported for participants where TAA Liable/Agent State Identifier (PIRL 926) is reported as zero (both) or two (Agent State). The TRA and A/RTAA measures will consider expenditures reported where TAA Liable/Agent State Identifier (PIRL 926) is reported as zero (both) or one (Liable State).

### Changes in Liable and Agent State Status

**Q1:** *Can Liable and Agent state change over the course of participation?*

**ANSWER:** Yes. While most states serve as both Liable and Agent State, Liable State is recalculated when new Unemployment Insurance (UI) claims are filed and thus could change due to employment after a trade-affected layoff. Agent State status may change if a participant moves or begins receiving services through a different state. Once a participant exits, the in TAA Liable/Agent State Identifier (PIRL 926) will remain the same through the end of the performance reporting period.

**Q2:** *A participant has changed their Liable/Agent status, what should be reported?*

**ANSWER:** The TAA Liable/Agent State Identifier (PIRL 926) should reflect all roles the state fulfilled in the report quarter. For example, if a state was an Agent State previous and also became the Liable State in the period, TAA Liable/Agent State Identifier (PIRL 926) should reflect 0=Both in quarterly reporting. TAA Liable/Agent State Identifier (PIRL 926) would also reflect 0=Both in a quarter where the state was originally serving as both Agent State and Liable state, but stopped serving one of those roles during the period. PIRL reporting would only reflect 1=Liable State or 2=Agent State in a quarter where the state only served one role throughout the quarter.

## Frequently asked Questions: Reporting Agent and Liable TAA Participants

**Q3:** *The state was serving as Liable State only for a participant, but now is neither serving as Agent State nor Liable State, what is reported?*

**ANSWER:** If the participant is no longer receiving benefits or services from the state as either agent or liable state, the participant will exit the program with the last applicable TAA Liable/Agent State Identifier (PIRL 926) reflecting 1=Liable State.

**Q4:** *The state was serving as Agent State only for a participant, but now is neither serving as Agent State nor Liable State, what is reported?*

**ANSWER:** If the participant is no longer receiving benefits or services from the state as either agent or liable state, the participant will exit the program with the last applicable TAA Liable/Agent State Identifier (PIRL 926) reflecting 2=Agent State.

**Q5:** *What should be reported in the PIRL when a participant changes Agent/Liable status?*

**ANSWER:** The reporting requirement for transitions in Agent/Liable status are as follows.

Original Agent/Liable Status	New Agent/Liable Status*	<u>TAA Liable/Agent State Identifier</u> (PIRL 926) in Quarter of Transition	<u>TAA Liable/Agent State Identifier</u> (PIRL 926) in Quarter Subsequent to Transition
Liable Only	Both	0=Both	0=Both
Agent Only	Both	0=Both	0=Both
Both	Liable Only	0=Both	1=Liable
Both	Agent Only	0=Both	2=Agent
None	Liable Only	1=Liable	1=Liable
None	Agent Only	2=Agent	2=Agent
Liable Only	None	1=Liable	1=Liable**
Agent Only	None	2=Agent	2=Agent**

\* Agent/Liable State Identifier is not recalculated once a participant has exited. Once the participant exits, TAA Liable/Agent State Identifier (PIRL 926) should remain the same throughout the performance reporting period.

\*\* If a state is serving as neither Agent State nor Liable State in the period, the participant will exit the program normally as they are no longer receiving benefits or services from the state.