

Frequently Asked Questions: Reporting TAA Intake in PIRL

Qualifying Separation

Q1: *What is the difference between an Adversely Affected Worker (AAW) and an Adversely Affected Incumbent Worker (AAIW)?*

ANSWER: An AAW means a worker, who, because of lack of work in adversely affected employment, has been totally or partially separated from such employment. An AAIW is a worker who is a member of a worker group certified as eligible to apply for TAA who has not been totally or partially separated from adversely affected employment, but who is determined to be individually threatened with total or partial separation.

Q2: *How is a participant reported in PIRL if they are partially separated?*

ANSWER: Unless the participant previously received benefits or services as an AAIW (see Q5), the participant must be reported as an AAW and Adversely Affected Incumbent Worker (PIRL 1330) must be reported as 0 (No). The Most Recent Date of Qualifying Separation (PIRL 411) must be reported as the date when the worker's wages or hours were reduced sufficiently to trigger eligibility as a partially separated worker. Similarly, Tenure with Employer at Separation (PIRL 412) must be calculated from this date.

Q3: *If an AAW has more than one qualifying separation, which is reported in PIRL?*

ANSWER: The qualifying separation reported is the separation from trade affected employment that is within the certification period (between the impact and expiration dates, inclusively). In some circumstances, a worker may have more than one qualifying separation during this period. For example, a worker may be separated, recalled, and subsequently separated again within the period of eligibility. If the worker has more than one qualifying separation, the most recent date is reported in Most Recent Date of Qualifying Separation (PIRL 411). Tenure with Employer at Separation (PIRL 412) is calculated based on the date reported in Most Recent Date of Qualifying Separation (PIRL 411).

Q4: *How are AAIWs reported in PIRL?*

ANSWER: Most PIRL elements are reported the same whether a TAA participant is an AAIW or AAW. There are three elements with instructions exclusive to AAIWs:

1. Adversely Affected Incumbent Worker (PIRL 1330) is reported as 1 (Yes) if the participant is (or was) an AAIW. If a qualifying subsequent total or partial separation occurs, this element will still be reported as 1 (Yes) because some TAA benefits or services were provided prior to separation.
2. Most Recent Date of Qualifying Separation (PIRL 411) should be reported as blank for an AAIW. However, once a qualifying total or partial separation occurs, the date on which that separation occurred must be reported in this element.
3. Tenure with Employer at Separation (PIRL 412) should be reported as blank for an AAIW. However, once a qualifying total or partial separation occurs, the calculated tenure with employer must be entered.

Q5: *If an AAIW is subsequently separated and becomes an AAW, how are they reported in PIRL?*

ANSWER: If the participant received TAA training or employment or case management services as an AAIW, then Adversely Affected Incumbent Worker (PIRL 1330) must be reported as 1 (Yes) even after a subsequent

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qualifying separation. Once the separation occurs, the Most Recent Date of Qualifying Separation (PIRL 411) and Tenure with Employer at Separation (PIRL 412) must both be populated.

Q6: *If an AAIW is separated after the certification expires, is that separation date reported as a qualifying separation date?*

ANSWER: No. Because the separation occurred outside the period of eligibility for the certification, it is not a qualifying separation. The participant was served as an AAIW with no further benefits accrued after certification expiration and must be reported with a blank Most Recent Date of Qualifying Separation (PIRL 411). For the participant to be served as an AAW, a separate petition must be certified to cover the period of the participant separation.

TAA Petition Number

Q1: *In what format is the TAA petition number entered in PIRL 915?*

ANSWER: The TAA Petition Number (PIRL 915) is entered in the format 91000A. The value always starts with the numeric portion of the petition number and is followed by any applicable alphabetic suffix. The entry does *not* include “TAW” and all suffix alpha characters are upper-case. A petition number will typically fill only five or six of the available nine digits.

Q2: *Is the petition number field different in PIRL than it was under TAPR?*

ANSWER: Yes. The TAA Petition Number (PIRL 915) now *must* contain any suffix letters that apply to the certified worker group. Previously, under TAPR, these letters were excluded. For example, the petition number 91000A must now include the A.

Q3: *Why are there nine available digits for the TAA petition number?*

ANSWER: The TAA Petition Number (PIRL 915) currently has five numeric digits and has used as many as two alphabetic digits. DOL anticipates that TAA petition numbers will reach a six-digit numeric petition code in the next few years. While only two suffix digits have been used so far, a certification that covers 53 locations would generate a third suffix digit. In order to ensure there is appropriate room in the field for the anticipated growth, nine total digits allow for up to six numeric digits and three alphabetic digits.

Q4: *What TAA petition number is used for participants under the Farmers and Fishers Program?*

ANSWER: The TAA Petition Number (PIRL 915) is 888888 for participants who are served under the Farmers and Fishers program. This is consistent with the code used under the previous TAPR format.

Q5: *Is there a dataset available of TAA petitions?*

ANSWER: Yes. The TAA website (www.doleta.gov/tradeact) has a variety of resources to look up TAA petition numbers. The right side of the TAA site has a search for to look up TAA petition numbers. The advanced search (https://www.doleta.gov/tradeact/petitioners/taa_search_form.cfm) allows users to search based on detailed criteria. Both provide results with the relevant information such as the TAW number, location, impact/expiration/determination dates, and a link to the determination document. A

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dataset is also available to download for analysis at: <https://www.doleta.gov/tradeact/taa-data/petitions-determinations-data/> (the big red button). This downloadable dataset is also used by the Trade Adjustment Assistance Data Integrity (TAADI) Self-Check, but is only updated monthly with a one-month delay.

Q6: *What is required for a TAA petition number to be valid?*

ANSWER: The TAA Petition Number (PIRL 915) must correspond to the TAW number (with suffix, if applicable) of the determination that is the basis of the participant's eligibility. For a participant to be eligible, they must be part of the worker group certified eligible. As such, the petition must be certified (C, C1, C2, CD, CU, or P determination code).

Q7: *What is a petition eligibility period?*

ANSWER: The petition eligibility period runs from the impact date through the expiration date of the petition (inclusively). Typically, the impact date is one year prior to the filing of the petition and the expiration is two years after the petition is certified. However, there are exceptions including:

1. Impact dates may be adjusted to prevent overlapping petition eligibility periods for the same worker group.
2. Certifications based on International Trade Commission (ITC) determinations have a maximum eligibility period, by statute, of one year before the ITC determination is posted in the Federal Register to one year after the posting. For more details on ITC-related petitions, see the [ITC-Related Petitions FAQ](#).
3. Expiration dates may be revised by subsequent determinations such as a termination of certification.

Q8: *How does the worker separation date relate to the petition eligibility period?*

ANSWER: For a participant who has a qualifying separation, the Most Recent Date of Qualifying Separation (PIRL 411) must be the same date as or later than the impact date (earliest date the group is certified for) and on or before the expiration date (last date of eligibility).

Q9: *How does the Date of First TAA Benefit or Service (PIRL 925) relate to the petition eligibility period?*

ANSWER: Since a participant may not receive TAA benefits or services before being determined eligible under a certified worker group, the Date of First TAA Benefit or Service (PIRL 925) will always be on or after the date the petition was certified. For AAW, the petition eligibility period determines when an individual must have had a qualifying separation. In other words, an individual's qualifying separation must be within the petition eligibility period. However, an AAW may receive services after the expiration of the petition eligibility period.

For participants who are AAIW, because services may only be provided without a qualifying separation until the end of the petition eligibility period, the Date of First TAA Benefit or Service (PIRL 925) will always be prior to the end of the expiration date.

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Application, Eligibility, and First TAA Benefit or Service

Q1: *Does the TAA application date refer to the application for a particular benefit?*

ANSWER: No. The TAA Application Date (PIRL 924) records when an individual participant applies to be determined part of an eligible TAA worker group. This is a pre-requisite to eligibility for any benefit or service of the TAA program.

Q2: *Are individuals who received a TAA eligibility determination, but have not received TAA benefits or services reported in the PIRL as participants of the TAA program?*

ANSWER: No, they are not required to be reported for TAA. However, the individuals may be participants or reportable individuals under other programs. Individuals determined ineligible need not be reported at all for TAA. Those who are TAA eligible are only required to be reported once TAA benefits or services are received.

Q3: *What are the date constraints on TAA application, eligibility, and first benefit or service?*

ANSWER: Because all participants must apply to be TAA eligible before being determined eligible and must be determined eligible before receiving benefits or services, the application, eligibility, and first benefit or service dates must come in that order. That is to say, TAA Application Date (PIRL 924) will always be on or before the TAA Date of Eligibility Determination (PIRL 927) and TAA Date of Eligibility Determination (PIRL 927) will always be on or before the Date of First TAA Benefit or Service (PIRL 925).

Q4: *Can a worker who is part of a petitioning work group receive TAA benefits and services while waiting for the group to be TAA certified?*

ANSWER: No. A worker must first be a member of a worker group certified as eligible to apply for TAA benefits and then be determined eligible on an individual basis for TAA benefits and services. Workers whose petitions have not yet been certified may be eligible for services under other programs. For reporting, all TAA participants must be reported with a TAA Petition Number (PIRL 915) that was certified on or before the Date of First TAA Benefit or Service (PIRL 925).

Q5: *When is Date of First TAA Benefit or Service (PIRL 925) required to be populated?*

ANSWER: Date of First TAA Benefit or Service (PIRL 925) is required to be populated the first time a participant receives any TAA-funded benefit or service. This includes benefits such as Trade Readjustment Allowances (TRA) and Reemployment Trade Adjustment Assistance (RTAA) as well as services such as employment and case management services (CM) or training services. The provision of job search and relocation will also trigger TAA participation if the individual is not a current TAA participant, which most commonly occurs after not receiving services for 90 days. A full list of TAA participant triggering activities is available in Table D of [Attachment III](#) of [TEGL 14-18](#).

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Q6: Will Date of First TAA Benefit or Service (PIRL 925) be the same as any other dates in the PIRL?

ANSWER: Generally, the Date of First TAA Benefit or Service (PIRL 925) will be the same date as the earliest of the dates listed below. There are, however, two potential exceptions:

1. The first TAA benefit or service provided is job search. Because the PIRL does not track the date of job search activities, but the Date of First TAA Benefit or Service (PIRL 925) would reflect this date if it was the benefit or service provided. Therefore, participants who have only received job search services may have a Date of First TAA Benefit or Service (PIRL 925) earlier than any of the dates below.
2. An individual receives services from a non-TAA program prior to receiving TAA benefits or services. Because training funded by another program may be provided to non-TAA participants who later become TAA program participants, the Date Entered Training #1 (PIRL 1302) may be a date prior to Date of First TAA Benefit or Service (PIRL 925).

<u>Date of First Case Management and Employment Service</u> (PIRL 902)
<u>Date Entered Training #1</u> (PIRL 1302)*
<u>Date Received First Basic TRA Payment</u> (PIRL 1511)
<u>Date Received First Additional TRA Payment</u> (PIRL 1516)
<u>Date Received First Remedial/Prerequisite TRA Payment</u> (PIRL 1521)
<u>Date Received First Completion TRA Payment</u> (PIRL 1526)
<u>Date Received First A/RTAA Payment</u> (PIRL 1534)
<u>Date Relocation Allowance Approved</u> (PIRL 1508)

*May be provided under co-enrollment.

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Q7: Can you tell me what the constraints are for TAA intake-related PIRL elements?

ANSWER: The table below details the constraints on the key TAA intake-related PIRL elements. Most of these constraints (except those based on petition dates) are enforced by [WIPS edit checks](#). Records that pass edit checks, but do not meet the constraints below, will not pass the Trade Adjustment Assistance Data Integrity (TAADI) petition number check detailed in [TEGL 01-19](#).

PIRL Number	Data Element	Constraint
411	Most Recent Date of Qualifying Separation	Must be between impact date and expiration date or blank.
412	Tenure with Employer at Separation	Must not be null, 0, or 999 if <u>Most Recent Date of Qualifying Separation</u> (PIRL 411) is populated.
915	TAA Petition Number	Must be entered when <u>Date of First TAA Benefit or Service</u> (PIRL 925) is entered.
	- Impact Date (Earliest Eligible Separation Date)	Department data based on petition number.
	- Determination Date (When the Decision is Issued)	Department data based on petition number.
	- Expiration Date (Last Eligible Separation Date)	Department data based on petition number.
924	TAA Application Date	Must be earlier than or the same as <u>TAA Date of Eligibility Determination</u> (PIRL 927).
925	Date of First TAA Benefit or Service	Must be earlier than or the same as the first date of all individual TAA benefits or services.* Must be on or after the petition determination date. Must be on or before the petition expiration date if <u>Adversely Affected Incumbent Worker</u> (PIRL 1330) = 1 (AAIW).
927	TAA Date of Eligibility Determination	Must be earlier than or equal to <u>Date of First TAA Benefit or Service</u> (PIRL 925). Must be on or after the petition determination date.
1330	Adversely Affected Incumbent Worker (AAIW)	Must be 0 if <u>Most Recent Date of Qualifying Separation</u> (PIRL 411) is before or on <u>Date of First TAA Benefit or Service</u> (PIRL 925). Must be 1 if <u>Most Recent Date of Qualifying Separation</u> (PIRL 411) is blank or after <u>Date of First TAA Benefit or Service</u> (PIRL 925).

* *TAA benefit and service dates include Date of First Case Management and Employment Service (PIRL 902), Date Entered Training #1 (PIRL 1302)**, Date Received First Basic TRA Payment (PIRL 1511), Date Received First Additional TRA Payment (PIRL 1516), Date Received First Remedial/Prerequisite TRA Payment (PIRL 1521), Date Received First Completion TRA Payment (PIRL 1526), Date Received First A/RTAA Payment (PIRL 1534), Job Search (Date not in PIRL, but benefit may not be recorded prior to PIRL 925), and Date Relocation Allowance Approved (PIRL 1508).*

** *These benefits and services may occur before Date of First TAA Benefit or Service (PIRL 925) if they were provided through a co-enrolled program prior to TAA participation.*