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

TRA and A/RTAA Overview

Q1: *What is TRA?*

ANSWER: The Trade Readjustment Allowance (TRA) is a Trade Adjustment Assistance (TAA) Program benefit that provides income support 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 payable to the worker.

Under the current Trade Act of 1974 (as amended by the Trade Adjustment Assistance Reauthorization Act of 2015, or TAARA 2015) and under the Trade Act under the 2011 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 Act as amended by 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, 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 that is available to reemployed workers age 50 and older for up to two years and covers a portion of the difference between a worker's new wage 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), and Reemployment Trade Adjustment Assistance (enacted under the 2009 Program and reauthorized under the 2011 and 2015 Programs, RTAA replaced ATAA). As is the case for TRA, 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 the worker group. A chart to assist states or workers in making this determination is located on the TAA website: https://www.dol.gov/agencies/eta/tradeact/benefits.

ATAA and RTAA have different eligibility requirements and flexibilities, but the PIRL does not distinguish between the two and tracks receipt of these benefits using the same data elements because the benefits are similar and 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.dol.gov/sites/dolgov/files/ETA/tradeact/pdfs/side-by-side.pdf, and to view benefits available under different versions of the TAA Program, the website contains a chart comparing benefits: https://www.dol.gov/agencies/eta/tradeact/benefits.

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[1] Completion TRA was first authorized under the Trade Adjustment Assistance Extension Act of 2011.

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First Benefit Dates

Q1: *Where does the state document the date on which TRA and A/RTAA were first received?*

ANSWER: When a participant begins receiving a TRA or A/RTAA benefit, the date of the first receipt must be recorded in the PIRL. Each type of TRA is documented separately. The State documents the dates on which TRA and A/RTAA were first received in the TAA elements for Date Received First (Benefit), 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) for these PIRL elements 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: *How are the Date Received First (Benefit) data elements used?*

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: *What date is considered Date Received First (Benefit)?*

ANSWER: A first benefit date is the date on which the first benefit payment accrues against the grant. While TRA and A/RTAA payments may be made to provide benefit payments for time periods the participant was previously eligible, the Date Received First (Benefit) would still reflect the date of the accrual, not the first date of payment eligibility.

Q4: *If the participant received the benefit during a previous period of 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 is specific to the respective period of participation and does not include any benefit information from previous periods of participation. As such, all dates for Date Received First (Benefit) must be on or between the Date of First TAA Benefit or Service (PIRL 925) and Date of Program Exit (PIRL 901).

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TRA, A/RTAA, and Triggering/Exiting Participation

Q1: *Does issuing a TRA or A/RTAA payment trigger participation?*
ANSWER: In most cases, yes, issuance of TRA and A/RTAA payments triggers TAA participation. TRA and A/RTAA payments must occur on or after the date reported for Date of First TAA Benefit or Service (PIRL 925) in a participant record. However, an exception to participant record creation can occur if a Date of Program Exit (PIRL 901) is reported for a participant, and then a payment is issued after the date of program exit. See relevant Q and A below for more details.

Q2: *Does issuing TRA and A/RTAA payments extend the participant's date of exit?*
ANSWER: Yes. As with all TAA benefits and services, issuance of TRA and A/RTAA benefits extends exit as long as the participant has not already exited the TAA program (see Q4 below for treatment of payments made after Program Exit). This includes 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 the Date of Program Exit (PIRL 901) is reported? How do I report that?*
ANSWER: This occurs in situations where one or more TRA payments are subject to a correction of some type. Most often, this happens when a TRA claim is denied during an individual's period of participation and then subsequently awarded following a successful appeal.

In this situation, where the payment is issued after the Date of Program Exit (PIRL 901) is reported, but is based on weeks of eligibility that occurred during the individual's period of participation, issuance of the TRA payment is not reported in the PIRL because it does not correspond to the period of participation.

Q4: *What if a participant is issued an A/RTAA payment after the Date of Program Exit (PIRL 901) is reported? How do I report that?*
ANSWER: If an A/RTAA payment is issued after the Date of Program Exit (PIRL 901), and is based on an appeal of a denied claim, or is a correction of a payment that was made during the individual's period of participation, then it is not reported in the PIRL, as is the case with the TRA payments described in Q3.

However, A/RTAA payments *must* trigger a new participation if they are based on a claim that is submitted after the Date of Program Exit (PIRL 901) is reported. 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, an individual may apply for A/RTAA after the Date of Program Exit

(PIRL 901) is reported, and if at least one A/RTAA payment is issued as a result of that claim, a new period of participation is triggered and a new record must be created. The Date of First TAA Benefit or Service (PIRL 925) will correspond with the date that the A/RTAA payment is issued.

Participants with more than one period of participation are reported in the PIRL as separate records. These periods of participation may not overlap or be within 90 days of each other. See WIPS Duplicate rules at https://www.dol.gov/sites/dolgov/files/ETA/performance/pdfs/Duplicate_Rules.pdf.

Q5: *If TRA payments after exit are not reported in the PIRL, would that cause the PIRL expenditures to misalign with ETA-9130(M) expenditures?*
ANSWER: Yes. 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 10% 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 a discrepancy, OTAA recommends that the state include the number of participants affected and the associated dollar amounts that contributed to the relevant discrepancy in the state's TAADI response.

Q6: *Can I 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 or changed. This is true for participant reporting for the TAA Program, as well as all other programs that report through participant records in the 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 element includes the expenditures accrued across a participant's entire period of participation. The quarterly expenditures report only those expenditures accrued in the 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 TRA and A/RTAA Total 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 must be reported on the grant active during that quarter.

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

ANSWER: 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 2021 Q4 in the amount of $250. In FY 2022 Q1, it is determined that the correct accrual amount was $300. Because that accrual occurred in FY 2021 Q4, the total expenditures PIRL element must be adjusted to reflect the corrected amount. However, this change does not affect the current quarterly accrued expenditures since that accrual did not occur in the current quarter.

Q4: *TRA benefits were accrued against the grant after the expenditure period for that grant has ended, but during the closeout period. How are those reported in the ETA-9130?*

ANSWER: Expenditures should be reported against the grant active at the time of accrual. For example, if the expenditure is an adjustment to a benefit that accrued in FY 2021, then it is reported as described in Q3 above. However, if it is a new accrual that occurs in FY 2022, it may not be charged to the FY 2021 grant. The closeout period allows for adjustments to be recorded and payments to be made on accrued expenditure but does not extend the period of the grant. TRA benefits accrued or paid in FY 2022 must be reported against the FY 2022 TRA grant.

Q5: *Are there circumstances where the quarterly amounts in the PIRL and the ETA-9130 will not be consistent?*

ANSWER: Yes, but these instances will be rare. There are three circumstances where benefit expenditure amounts can be different between PIRL and the ETA-9130:

1. When benefit payments are issued retroactively after a Date of Program Exit (PIRL 901) they are not reported in the PIRL quarterly expenditure data element, but are reported in the ETA-9130.
2. When overpayments occur in the current quarter, are identified in the current quarter, and overpayment waivers are issued, then the overpayments will not be included in the PIRL quarterly expenditure data element, but are reported in the ETA-9130. This is described in questions 6 and 7 of the "Overpayments" section of this FAQ.
3. 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 the state wishes to prevent such an error, they may resubmit a corrected previous ETA-9130 to ensure that the calculated quarterly change is reflective of the quarterly expenditures.

These two scenarios are one of the reasons that TAADI allows for a 10 percent discrepancy between the 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 weekly in fixed monetary amounts, much like Unemployment Insurance.

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 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 this benefit at increments such as weekly, bi-monthly, or monthly, at the state's discretion.

Q3: *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 all weeks paid throughout the period of participation. The quarterly expenditures report only those weeks paid in the particular report quarter.

A/RTAA payments are collected both quarterly and cumulatively, with quarterly counts corresponding to activity within the report quarter, and cumulative counts to reflect the entirety of the period 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

Q4: *How do the TRA weeks and A/RTAA payment data elements get used?*

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 to meet statutory reporting requirements. Furthermore, because of statutory limits on the number of weeks TRA is paid, this reporting allows OTAA to ensure benefits are being properly attributed to the correct type of TRA and within the program-specific limits. We also use this information to determine how much of the benefit is being utilized. This information is valuable in developing projections for future year budget requests.

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

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Q5: *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 in getting proper documentation of eligibility for weeks prior to that reporting quarter, and processing delays.

Frequently Asked Questions:
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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. The state is required to recapture overpayments unless a waiver is granted.

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) must be set to 1 (Yes). Once an overpayment occurs, this element remains 1 for all subsequent reporting quarters for that period of participation even if the overpayment was recaptured and no further overpayments are made. The amount of the overpayment is reported in Amount of TRA Overpayment (PIRL 1532). The amount reported is the amount of all overpayments even if the overpayment was recaptured. If a waiver was issued for an overpayment (i.e. recapture is not necessary), TRA Overpayment Waiver (PIRL 1533) is 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) is set to 1 (Yes). The current item definition indicates 1 is only 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 must remain 1 for all subsequent reporting quarters for that period of participation even if the overpayment was recaptured. The amount of the overpayment is reported in Amount of A/RTAA Overpayment (PIRL 1542). The amount reported is the amount of all overpayments even if the overpayment was recaptured. If a waiver was issued for an overpayment (i.e. recapture is not necessary), A/RTAA Overpayment Waiver (PIRL 1543) is reported as 1 (Yes) for that and all subsequent quarters.

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Q4: *How does overpayment data get used?*

ANSWER: The Department is periodically audited to determine the rate of overpayments for various benefits to meet its reporting requirements under federal law. 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.

Q5: *Are overpayments included in TRA weeks or A/RTAA payments counts?*

ANSWER: It depends. If an entire week or payment is an overpayment, it is not reported in the TRA weeks or A/RTAA payment counts. If the overpayment is just a portion of the total, the week/payment is reported in the payment counts. When a week or payment is entirely an overpayment, it does not count against the participants total possible benefits. Because these elements are used to determine how much of an available benefit has been utilized by the participant, the week/payment is not included in the TRA week or A/RTAA payment count. This affects the elements listed in question 3 of the "Tracking Ongoing Participation and Duration: TRA Weeks and A/RTAA Payments" section of this FAQ.

Q6: *Are overpayments amounts included in TRA and A/RTAA total expenditures?*

ANSWER: No. If an overpayment occurs, the overpayment is not included in the quarterly or cumulative total expenditures described in question 1 of the "Quarterly and Total Expenditures" section of this FAQ. Because that amount will be included in either Amount of TRA Overpayment (PIRL 1532) or Amount of A/RTAA Overpayment (PIRL 1542), it should not also be included in total expenditure amounts. The reporting described occurs whether or not an overpayment waiver was issued.

Q7: *Will the exclusion of overpayments cause misalignment within financial measures in the TAADI?*

ANSWER: It depends. If the overpayment occurs in the current quarter, is identified in the current quarter, and an overpayment waiver is issued, the overpayment amount will be included in the quarterly ETA-9130 amount but not the PIRL amount and will cause misalignment. However, this is unlikely to result in a 10% discrepancy as overpayments are rare, typically a small portion of total payments, and often do not meet the conditions above.