

## 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 617.26(a) and 20 CFR 617.26(b), respectively. 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:** 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.

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**Q5:** *May Liable states pay for training, job search, and relocation?*

**ANSWER:** Yes. Typically the Agent State accrues expenditures for training, job search, and relocation. However, it is permissible for the Liable State to accrue these expenditures. 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.

**Q6:** *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 typically 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.

<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

\* The Agent State is typically responsible for Training, Job Search, and Relocation expenditures. However, it is permissible for Liable States to accrue these costs instead.

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**Q7:** *How about Case management and administrative expenditures? How are these handled in this context?*

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.

**Q8:** *Will reporting another state's accrued expenditures cause a discrepancy on TAADI expenditure measures?*

**ANSWER:** TAADI expenditure calculations are being 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). In the rare circumstances where a Liable State pays Training costs, Job Search allowances, or Relocation allowances, the resulting discrepancy between the PIRL and the 9130 should be explained by the state on the TAADI response.

Please note, prior to FY 2019, states fully reporting expenditures may see discrepancies in TAADI if accrued expenditures on those participants exceed the 15% threshold. States may respond to TAADI by simply citing this reason for the discrepancy. States may also proactively provide this explanation by email when they submit data to have the discrepancy marked as "Explained" on the quarterly TAADI report card.