

# TAA and DW Co-Enrollment Fact Sheet #1: Perceived Barriers of Cost & Performance

The statutory, regulatory, and administrative requirements to co-enroll Trade Adjustment Assistance (TAA) participants in the WIOA Dislocated Worker (DW) Program are clear:

- Sec. 125. DECLARATION OF POLICY; SENSE OF CONGRESS. ([Trade Reform Act of 2002](#))  
*(a) DECLARATION OF POLICY.—Congress reiterates that, under the trade adjustment assistance program under chapter 2 of title II of the Trade Act of 1974, workers are eligible for transportation, childcare, and healthcare assistance, as well as other related assistance under programs administered by the Department of Labor.*
- Trade Adjustment Assistance Reauthorization Act ([TAARA](#)) 2015, Sec. 239(f):  
*Any agreement entered into under this section shall provide for the coordination of the administration of the provisions for employment services, training, and supplemental assistance under sections 235 and 236 of this Act and under title I of the Workforce Innovation and Opportunity Act upon such terms and conditions as are established by the Secretary in consultation with the States and set forth in such agreement. Any agency of the State jointly administering such provisions under such agreement shall be considered to be a cooperating State agency for purposes of this chapter.*
- Governor-Secretary Agreement:  
*The Department concludes that no additional regulatory language is needed in the WIOA rules to compel compliance with this new requirement, since [adversely affected workers] AAWs are eligible to be enrolled in the WIOA dislocated worker program upon request. The States, under the Governor-Secretary Agreement, are bound to the implementation of these rules. The Governor-Secretary Agreement binds the entire executive branch of the State government to the terms and conditions of the Agreement and the implementation of the TAA Program. ([TAA Final Rule Preamble](#))*
- TAA Final Rule 20 CFR 618.325(a)(1):  
*A State must co-enroll trade-affected workers who are eligible for WIOA's dislocated worker program. Workers may choose to decline co-enrollment in WIOA. A State cannot deny such a worker benefits or services under the TAA Program solely for declining co-enrollment in WIOA.*
- Training and Employment Guidance Letter ([TEGL](#)) No. 04-20  
*WIOA emphasizes integrating services to better serve workforce customers. The TAA Final Rule furthers this effort by providing staffing flexibilities and requiring the co-enrollment of trade-affected workers with the WIOA DW program.*
- [TEGL No. 16-21, Attachment I](#):  
*To the extent trade-affected workers require assistance or services not authorized under the TAA Program, or for which TAA Program funds are unavailable or insufficient (including for required employment and case management services), the state will make such assistance available through the American Job Center network, including DW and DWGs.*

Data shows that co-enrollment between TAA and the WIOA Title I Dislocated Worker (DW) program results in better performance outcomes that are significant and consistent over time. However, 41 percent of new TAA participants are co-enrolled with the DW program.<sup>1</sup>

According to feedback from states, two main barriers to co-enrollment are perceptions of:

1. Cost
2. Performance

This Fact Sheet aims to address these perceived barriers. ([TAA and DW Co-Enrollment Fact Sheet #2](#) addresses the perceived barriers of eligibility and benefit and service provision.)

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<sup>1</sup> PIRL Data 1/1/2020-12/31/2020, as of 3/17/2021

# COST

*Myth: DW has limited funds, so TAA participants should be limited to TAA funds.*

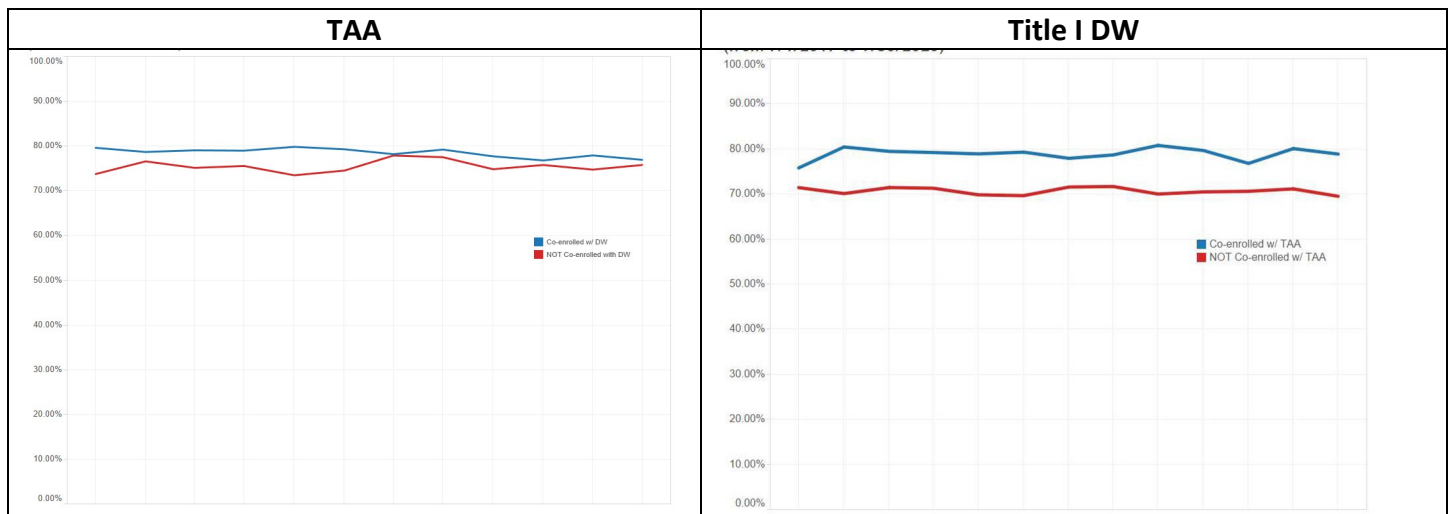
**Busted:**

- Co-enrollment requires that WIOA program funds must contribute to at least one service, which could include case management alone (in either one-on-one, or group settings).
- There is no requirement that any portion of the training costs for TAA participants be funded by WIOA where participants are co-enrolled.
- There are many ways to coordinate co-enrollment that are a minimal cost burden for WIOA programs, including resume writing workshops, financial literacy, etc.

# PERFORMANCE

*Myth: Co-Enrollment hurts WIOA performance.*

**Busted: Performance improves** when TAA participants are co-enrolled with Title I DW (left view). The same is true for DW participants co-enrolled with the TAA program (right view). See these trends on Employment Rate (ER) 2<sup>nd</sup> Quarter After Exit:



--- Co-Enrolled    --- Not Co-Enrolled

PIRL Data: FY2018-FY2020

**There are other high performance results for TAA Participants Co-Enrolled with DW and for DW Participants co-enrolled with TAA.** See the following table:

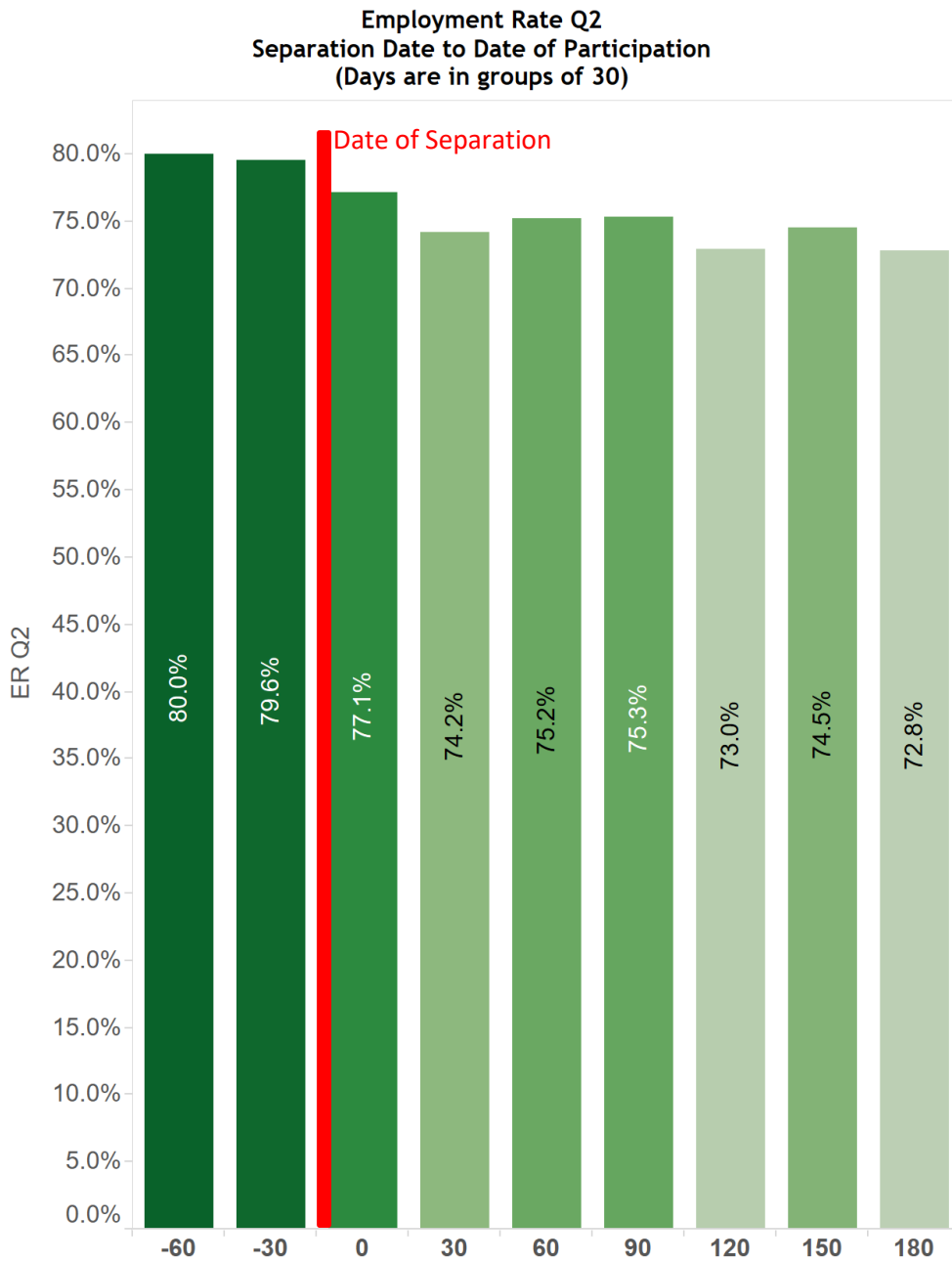
Measure	TAA Data <sup>2</sup>			DW Data <sup>3</sup>		
	Co-Enrolled with DW	Not Co-Enrolled	Net Benefit	Co-Enrolled with TAA	Not Co-Enrolled	Net Benefit
Training Participation	74%	37%	+37	73%	16%	+57
Credential Attainment	75%	67%	+8	74%	69%	+5

<sup>2</sup> PIRL: Exitors- 1/1/2020-12/31/2020, as of 3/9/2021

<sup>3</sup> PIRL: Exitors -1/1/2020-12/31/2020, as of 3/10/2021

## Performance, Continued

Individuals may be enrolled in WIOA while TAA group eligibility is still being determined. Therefore, co-enrollment provides access to early intervention services which lead to better outcomes.



Based on PIRL data, 1/1/2020-12/31/2020

# Scenarios

## ***Perceived Barrier #1: TAA Participation Will Hurt WIOA Performance Outcomes Because They Are Different Programs and Have Different Goals***

Discussion: There is the perception that the TAA Program goals differ from that of WIOA, which results in different performance outcomes.

Solution(s): TAA primary indicators of performance are aligned with those of the WIOA DW program. The WIOA DW program can claim credit for outcomes on performance indicators attained by TAA program participants who receive TAA funded services, as long as they are determined eligible for the DW program and receive at least one qualifying WIOA DW-funded service. This can include case management. Thus, the successes of co-enrolled workers will contribute to the state's ability to meet WIOA performance standards. For more information on co-enrollment and costs, see above section on cost.

## ***Perceived Barrier #2: TAA Participation Will Hurt WIOA Outcomes Because TAA Participants Are in the Program for Significantly Longer Periods than WIOA DW Participants***

Discussion: Average participation in TAA is longer than in DW (533 days<sup>4</sup> to 130 days<sup>5</sup>, respectively). There is the perception that this will hurt WIOA outcomes.

Solution(s): WIOA and TAA performance indicators are calculated after exit. Therefore, length of participation has no impact on WIOA outcomes. This topic has bearing on common exit policy (see [TAA and DW Co-Enrollment FAQ](#)).

TAA participants are often engaged in long-term training, but this should not be a disincentive to co-enrollment. In fact it can be an asset. The Measurable Skill Gains performance indicator under WIOA measures the progress of participants engaged in training so positive outcomes can be reflected even during long term training. For more information on Measurable Skill Gains, see [TEGL 10-16, Change 1, p.18](#).

## ***Perceived Barrier #3: TAA Participation Will Hurt Local Contract Metrics Because TAA Participants Are in the Program for Significantly Longer Periods than WIOA DW Participants***

Discussion: Average participation in TAA is longer than in DW (533 days<sup>6</sup> to 130 days<sup>7</sup>, respectively). There is the perception that this will hurt local contract metrics for One-Stop administration. Many local area contracts include participant count targets by program including both new participants and exiters.

Solution(s): Length of participation and number of participants served are not metrics reviewed by the US Department of Labor. While it may be part of local contracts, the state policy and local workforce development boards should accommodate the length of Trade participation in their contract development to ensure that Trade participants are included but the local is not penalized for serving those participants.

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<sup>4</sup> PIRL data: 1/1/2020-12/31/2020, as of 3/9/2021

<sup>5</sup> PIRL data: 1/1/2020-12/31/2020, as of 3/9/2021

<sup>6</sup> PIRL data: 1/1/2020-12/31/2020, as of 3/9/2021

<sup>7</sup> PIRL data: 1/1/2020-12/31/2020, as of 3/9/2021

**Perceived Barrier #4: *Co-Enrolling TAA Participants Will Hurt Outcomes Because TAA Participants May Have Barriers to Employment such as Being an English Language Learner, an Older Individual, or Being Basic Skills Deficient***

Discussion: TAA participants are perceived as having barriers to employment which some consider to negatively impact performance outcomes.

Solution(s): WIOA requires an objective statistical adjustment model be used to make adjustments to the State negotiated levels of performance for actual economic conditions and the characteristics of participants served. It also is a factor used in setting State negotiated levels of performance. The statistical adjustment model is run before the program year to inform the negotiation process, and after the close of the program year to account for actual economic conditions and characteristics of participants served (WIOA section 116(b)(3)(A)(viii)).

Therefore, the expected state results for participants with one or more barriers to employment will be adjusted in a manner that reflects the estimated impact those barriers will have on achieving a successful outcome.

Serving those with barriers to employment is a core mandate of WIOA, so it would be consistent that WIOA would welcome TAA participants who have these same barriers and who have access to additional funding sources (TAA).

**Perceived Barrier #5: *Participants are Older Workers who are Close to Retirement Age. This Could Negatively Affect Performance.***

Discussion: The retirement waiver available under TAA was eliminated in 2011. Older workers who enroll in the program, and then retire, are perceived to negatively affect performance outcomes. And in fact, TAA Participants are typically older than the average age of a WIOA DW participants.

Solution(s): The statistical adjustment model and negotiated performance goals established under WIOA consider the age of participants when calculating performance targets. Thus, serving such workers will not have a negative impact on adjusted performance outcomes.

Historically, pre-PIRL reporting for the TAA Program allowed for reporting retirement in order to calculate its impact on performance. From FY14-FY17, there were only 345 EER Exiters recorded as exiting for retirement, which is less than 1% of the total TAA population served during that time period (345 exited for retirement purposes during this time/53,021 total TAA participants during this time = .65%). Thus, while those who retired had a lower EER, the low percentage of retirees did not have an impact on the overall performance.