

MEMORANDUM

DATE: March 25, 2019

TO: Local Workforce Development Board Executive Directors

FROM: Shila A. Salem, Chief, Bureau of One-Stop and Program Support *Shila A. Salem*

SUBJECT: Local Trade Adjustment Assistance Program Staff Time Charging

The purpose of this memorandum is to provide guidance for merit-staff employees designated as Local Trade Adjustment Assistance (TAA) Coordinators to properly charge work time within People First to the TAA Case Management and Wagner-Peyser grants. As outlined in Training and Employment Guidance Letter (TEGL) No. 01-10, the TAA program operates in accordance with merit principles established under the Wagner-Peyser Act. Under this guidance, the Department of Economic Opportunity (DEO), as the State Workforce Agency is required to use TAA funds to hire merit-staff employees to provide case management and employment services to trade-affected workers, and apply to the personnel standards for a merit system of personnel administration in accordance with Office of Personnel Management regulations at 5 CFR Part 900, subpart F to the TAA Coordinators.

To ensure employment and case management services provided to trade-affected workers are administered by state personnel, LWDBs are required to designate Local TAA Coordinators, who may be primarily funded by Wagner-Peyser. Oftentimes, Local TAA Coordinators provide trade-affected workers with Wagner-Peyser services before the participants receive their first TAA-funded service or benefit. Local TAA Coordinators also provide Wagner-Peyser services to non-TAA participants as further outlined below.

LWDBs should consider the following when determining the appropriate grant to which Local TAA Coordinators should charge their work time:

- Local TAA Coordinators must ensure they are charging work time to the appropriate grants (TAA Case Management and/or Wagner-Peyser) relative to the services provided to participants and the program under which the services fall.
- Local TAA Coordinators are not precluded from providing Wagner-Peyser services to non-TAA participants. In fact, it is encouraged and expected when the Local TAA Coordinator is managing a caseload of limited or no TAA participants. The time spent providing Wagner-Peyser services to non-TAA participants must be tracked and charged to Wagner-Peyser.
- Rapid Response is considered a TAA activity when the Rapid Response event is conducted in response to a potential trade-related layoff and the Local TAA Coordinator is presenting information on the TAA program. Local TAA Coordinators must charge the work time spent conducting TAA-related Rapid Response to TAA Case Management.

- Local TAA Coordinators should record all services provided to TAA participants under the participant's Employ Florida TAA application in accordance with DEO memorandum: [Trade Adjustment Assistance Employ Florida Changes](#), dated March 1, 2019.
- Merit-staff employees who supervise Local TAA Coordinators may only direct charge their time to the TAA Case Management grant when they are conducting TAA-funded activities or providing TAA-funded services to trade-affected workers. The time spent conducting or providing TAA-funded activities or services should be tracked to ensure appropriate time charging.

LWDBs are encouraged to provide a mechanism for staff to track the services provided by participant and by program, to include the time dedicated to providing those services. This may include running reports in Employ Florida that list services provided by program and/or individual staff which will be helpful in identifying services that were provided by TAA program staff across multiple programs.

The DEO Bureau of Financial Management is responsible for reviewing time charge trends and determining if adjustments are required. LWDBs will be contacted individually by DEO's Bureau of Financial Management when time charge adjustments are required.

If you have any questions, please contact Steven Gustafson at (850) 245-7477 or via email at Steven.Gustafson@deo.myflorida.com.

SAS/skg

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