Lower Savannah
Workforce Investment Area
Workforce Development Board
Workforce Development Department
Lower Savannah Council of Governments
Lower Savannah onestop Workforce System
2748 Wagener Road / Post Office Box 850, Aiken, SC 29802-0850 Ph:803/649-7981 Relay Service dial 711 (TTY) Fax:803/649-2248 Website: www.lswia.org

LOWER SAVANNAH TAA INSTRUCTION NUMBER: 09-04

TO: See Distribution Below
ORIGINAL DATE: June 14, 2010
REVISION DATE:
EFFECTIVE DATE: **MAY 20, 2010**
SUBJECT: **LENGTH OF TAA-APPROVED TRAINING AND BREAKS IN TRAINING**

PURPOSE: The purpose of this Instruction is to issue information regarding the length of approved TAA Training and breaks in training.

BACKGROUND: 20 CFR 617.22 limits the maximum number of TAA-approved weeks of occupational training to 104 weeks. The 2002 Amendments add the option to extend this time frame by 26 weeks for remedial training, for a total of 130 weeks. The 2009 Amendments allow a maximum of 156 weeks, **regardless** of the combination of remedial, prerequisite, or occupational *training (only for petitions ≥ 70,000)*.

Per the USDOL, regular semester breaks in training are not to be discounted from the total number of weeks (e.g., the weeks between one semester's end date and the next semester's start date, spring break, fall break, etc.).

The maximum allowable time frame for TAA-approved training is 104/130 weeks respectively for petitions ≤ 69,999 and 156 weeks for petitions ≥ 70,000. *There are no exceptions*. **All costs associated with training programs lasting longer than 104/130/156 weeks are disallowed in TAA.** It is imperative that participants' course schedules are closely monitored to ensure that full course loads of curriculum-related classes are taken in order to finish training programs within given time limits.

If, for example, a participant is issued a marketable skills waiver at first, a considerable time of his/her basic TRA will already have been exhausted by the time he/she begins training. Consequentially, the maximum allowable number of weeks in TAA-approved training might exceed his/her TRA eligibility period. Training may be approved for longer than a participant's period of TRA eligibility; however, the participant must provide proof of the financial ability to complete the training after the expiration of the TRA eligibility period. A copy of this documentation must be maintained in the participant's hard file and case notes should be recorded accordingly. ***This scenario is to be regarded as an exception!*** TRA eligibility and training timelines must continue to be closely matched in order to maximize participants' income support and chances for successful training completion.

An Equal Opportunity Employer/Program.
Auxiliary aids and services are available to individuals with disabilities upon request.

The following statement will suffice as proof of the participant's financial ability to complete the training after the expiration of the TRA eligibility period. No further documentation is needed. The statement is included in the TAA Training Agreement.

> *"I understand that I may exhaust my UI and TRA benefits before the projected end date of my training even though the cost of the training may continue to be paid.*
>
> *( ) I will have the financial resources available to cover my living expenses during the entire period of training if my benefits end prior to completion of training.*
>
> *( ) I will not have the financial resources available to cover my living expenses during the entire period of training if my benefits end prior to completion of training."*

If the Training Agreement is:

1. properly filled out,
2. signed and dated by the participant, **and**
3. maintained in the participant's hard file.

All TAA-approved training weeks do not necessarily have to be consecutive. The weeks of training must total the weeks of training allowable. Therefore, some breaks in training may be discounted; however, very specific stipulations apply:

1. The break must be at least 6 weeks long (30 training days; Monday-Friday); **and**
2. It must be for one of the following reasons:

    - Health/medical
    - Training not available
    - Waiting list

Example #1: A participant is certified under a petition numbered ≤ 69,999. S/he is enrolled into a TAA-approved training program lasting 130 weeks (including remedial training). In the semester before the last, s/he becomes seriously ill and is ordered by her Physician not to attend school for one semester.

Example #2: A participant is certified under a petition numbered ≤ 69,999. S/he is enrolled into a TAA-approved training program lasting 104 weeks. The last set of classes is to be taken during a summer session; however, the summer session is cancelled.

Example #3: A participant is certified under a petition numbered ≥ 70,000. S/he is enrolled into a TAA-approved training program lasting 130 weeks (including prerequisite training). After finishing the prerequisite training, s/he is placed on a waiting list for two semesters before s/he can begin the occupational skills training.

Note: A participant will not receive TRA during these training breaks as attendance sheets will not be turned in, and a waiver may not be issued for the time period.

Please see the attached document for detailed instructions on how to document breaks in training in VOS.

POLICY / ACTION: Effective **IMMEDIATELY**, all service providers shall review their active Trade participants to ensure that they meet the definition of allowable training and approved length of training. Should discrepancies be found, contact Les Johnson, Trade Coordinator, for technical assistance and further guidance on how to correct.

Please copy and distribute this information appropriately within your agency.

INQUIRIES: Direct all inquiries regarding this Instruction to the Lower Savannah WIA Workforce Development Staff, Lower Savannah Council of Governments, Post Office Box 850, Aiken, South Carolina 29802-0850, telephone 803-649-7981, fax 803-649-2248, or e-mail Sam Jordan at sjordan@lscog.org, Sally Sharpe at ssharpe@lscog.org, or Les Johnson at ljohnson@lscog.org.

Samuel R. Jordan *[Digital Signature for Website – **Initial here for Approval**:* *SJ* *]*
Samuel "Sam" R. Jordan
Workforce Development Administrator

dabh

Attachment: How to document Breaks in Training Power Point Presentation
Placed on LSWIA Website for downloading by - LSWIA Intensive Services/Training Services Coordination Program Director
LSWIA One-Stop Workforce/Career Center Operator
LSCOG WD Staff
SCDEW Representatives (dthill@dew.sc.gov; aanderson@dew.sc.gov)

Breaks in Training

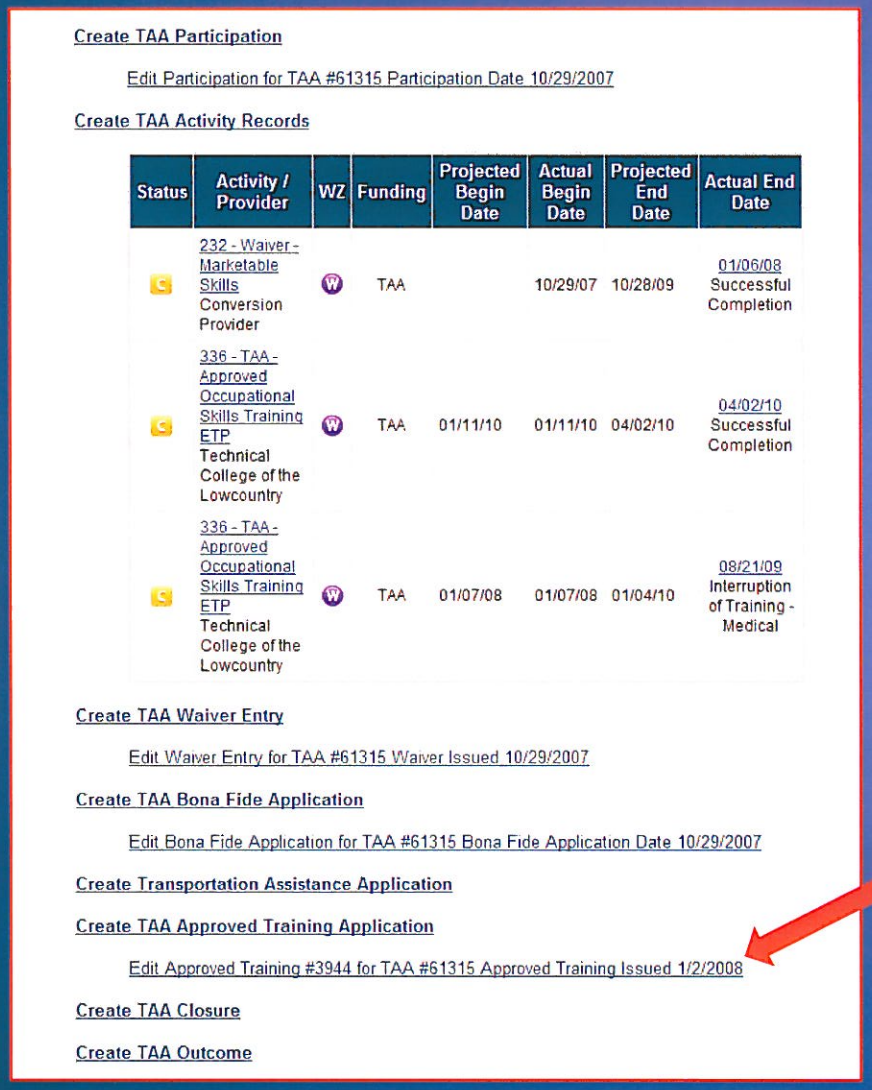
Re: E-mail Guidance from 5/20/2010

Breaks in Training

Very specific stipulations apply to breaks in training:

- The break must be at least 6 weeks long (30 training days; Monday-Friday); and
- It must be for one of the following reasons:
  - Health/medical;
  - Training not available; or
  - Waiting list.

Amending the Training Plan



Create TAA Participation

Edit Participation for TAA #61315 Participation Date 10/29/2007

Create TAA Activity Records

Status	Activity / Provider	WZ	Funding	Projected Begin Date	Actual Begin Date	Projected End Date	Actual End Date
C	232 - Waiver - Marketable Skills Conversion Provider	W	TAA		10/29/07	10/28/09	01/06/08 Successful Completion
C	336 - TAA - Approved Occupational Skills Training ETP Technical College of the Lowcountry	W	TAA	01/11/10	01/11/10	04/02/10	04/02/10 Successful Completion
C	336 - TAA - Approved Occupational Skills Training ETP Technical College of the Lowcountry	W	TAA	01/07/08	01/07/08	01/04/10	08/21/09 Interruption of Training - Medical

Create TAA Waiver Entry

Edit Waiver Entry for TAA #61315 Waiver Issued 10/29/2007

Create TAA Bona Fide Application

Edit Bona Fide Application for TAA #61315 Bona Fide Application Date 10/29/2007

Create Transportation Assistance Application

Create TAA Approved Training Application

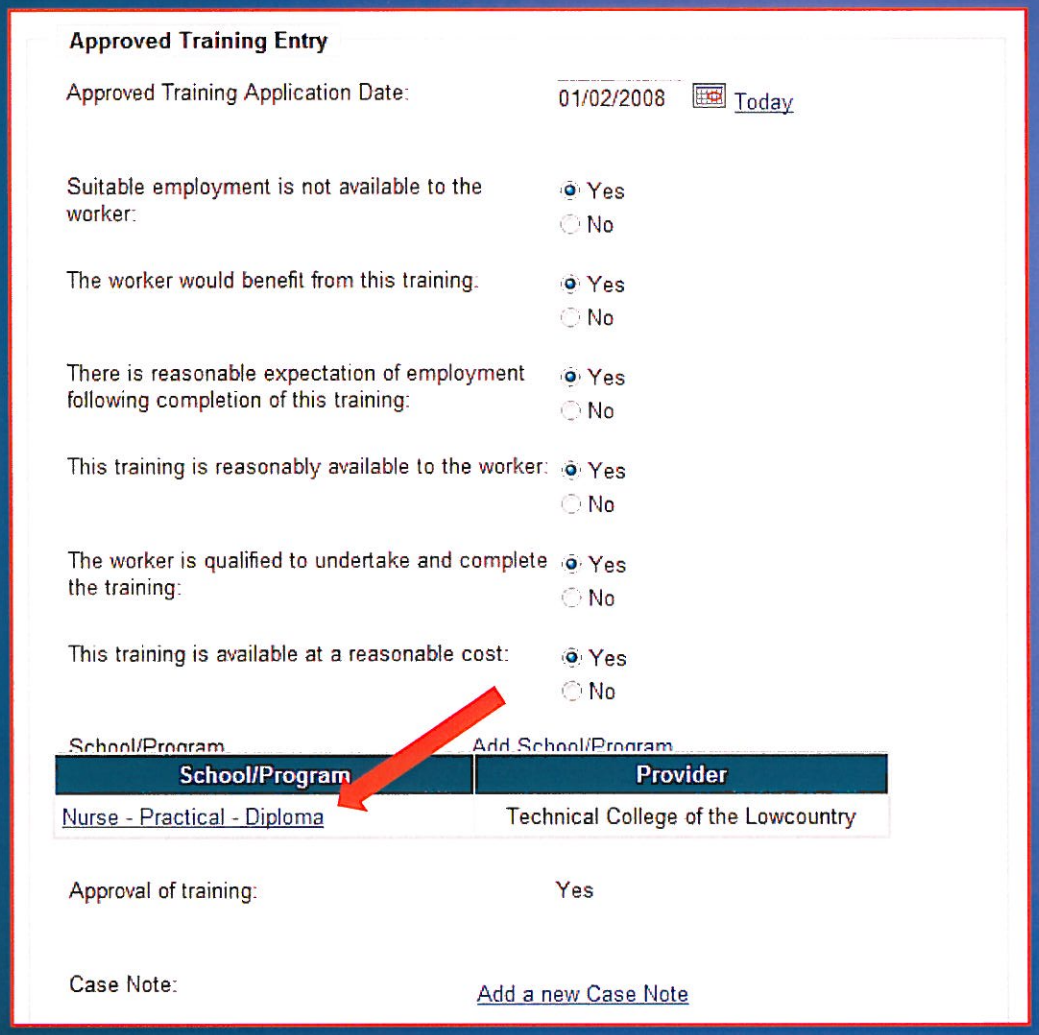
Edit Approved Training #3944 for TAA #61315 Approved Training Issued 1/2/2008

Create TAA Closure

Create TAA Outcome

In order to document the break in training in VOS, you will first have to amend the TAA-approved training plan (sub-application).

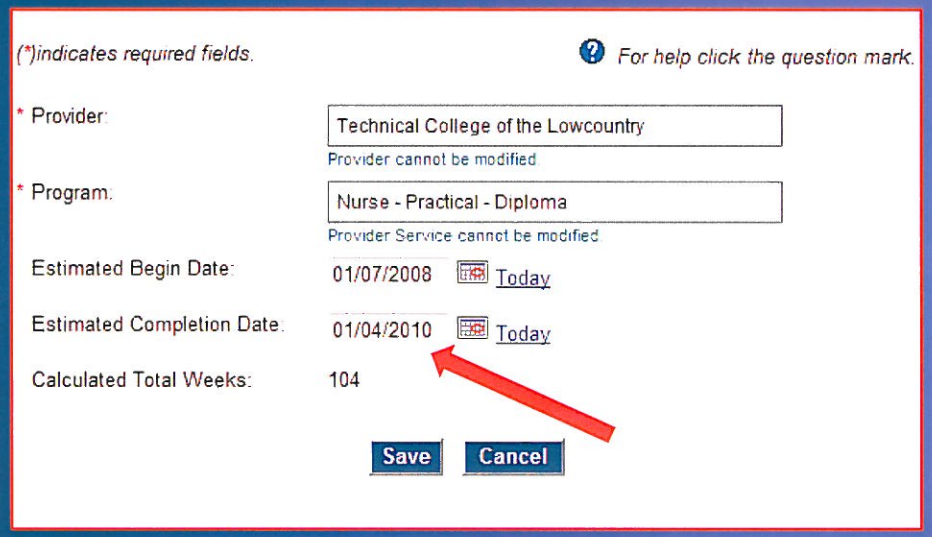
Amending the Training Plan



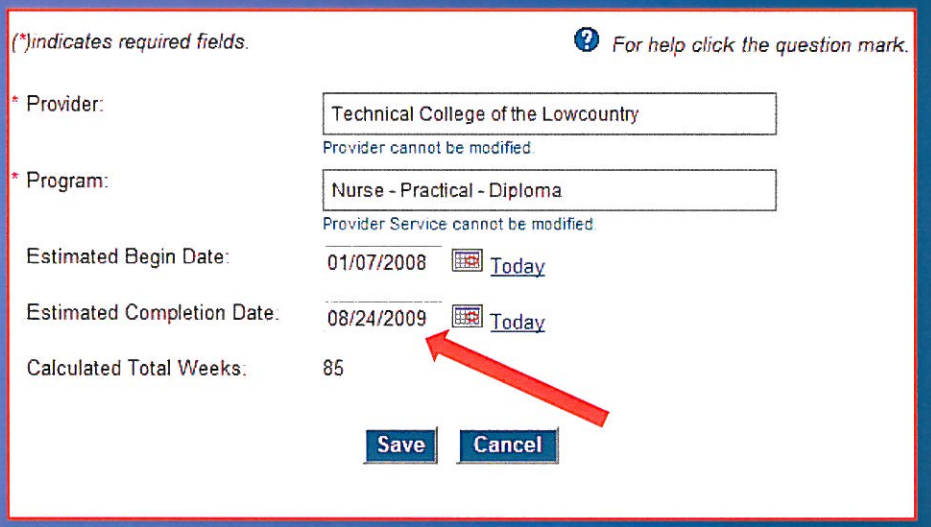
Click on the "School/Program" link in order to change the actual end date of the first training period.

Amending the Training Plan

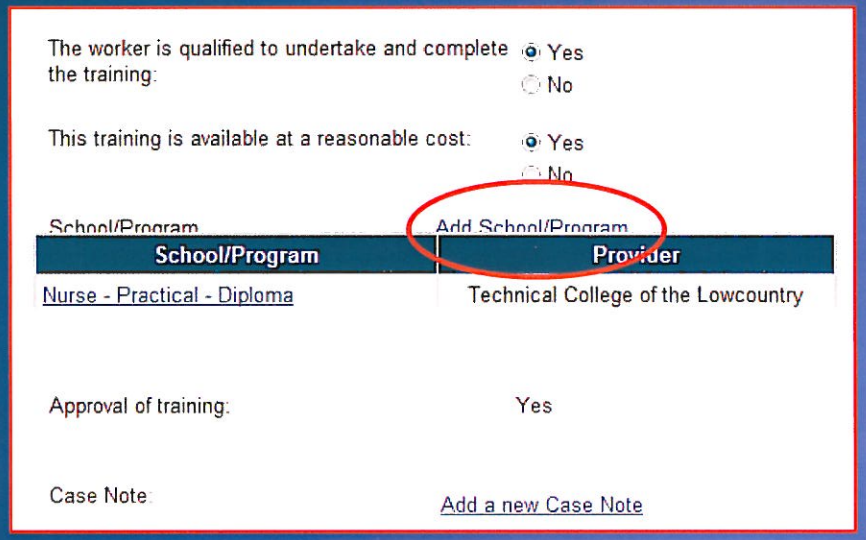
Change the old end date…



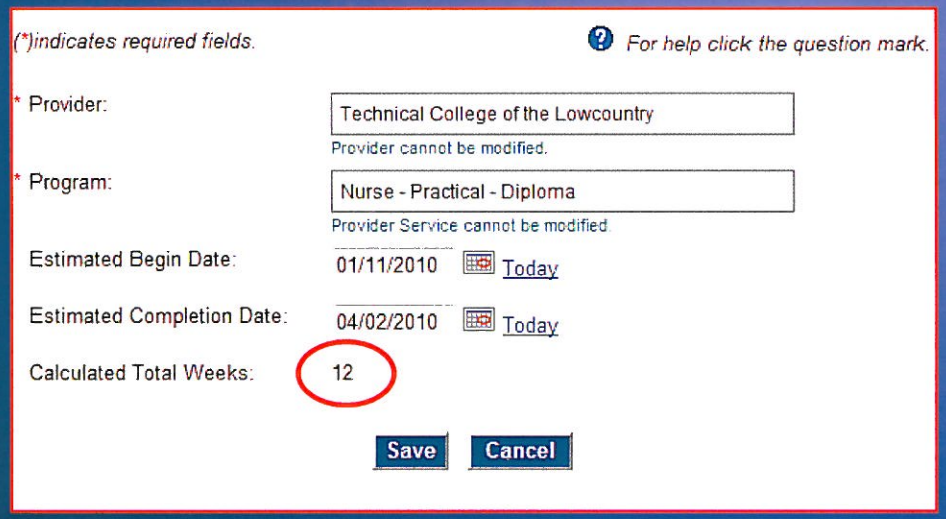
…to the new end date.



Amending the Training Plan



Add the second training period by clicking on the "Add School/Program" link in the training application.



The calculated total weeks of <u>both</u> training periods must not exceed the maximum limit of training weeks!

Amending the Training Plan

The worker is qualified to undertake and complete the training: (•) Yes ( ) No

This training is available at a reasonable cost: (•) Yes ( ) No

School/Program Add School/Program

School/Program	Provider
Nurse - Practical - Diploma	Technical College of the Lowcountry
Nurse - Practical - Diploma	Technical College of the Lowcountry

Approval of training: Yes

Case Note: Add a new Case Note

85 weeks

+ 12 weeks

= 97 weeks

Whew! We're under the 104 week limit...

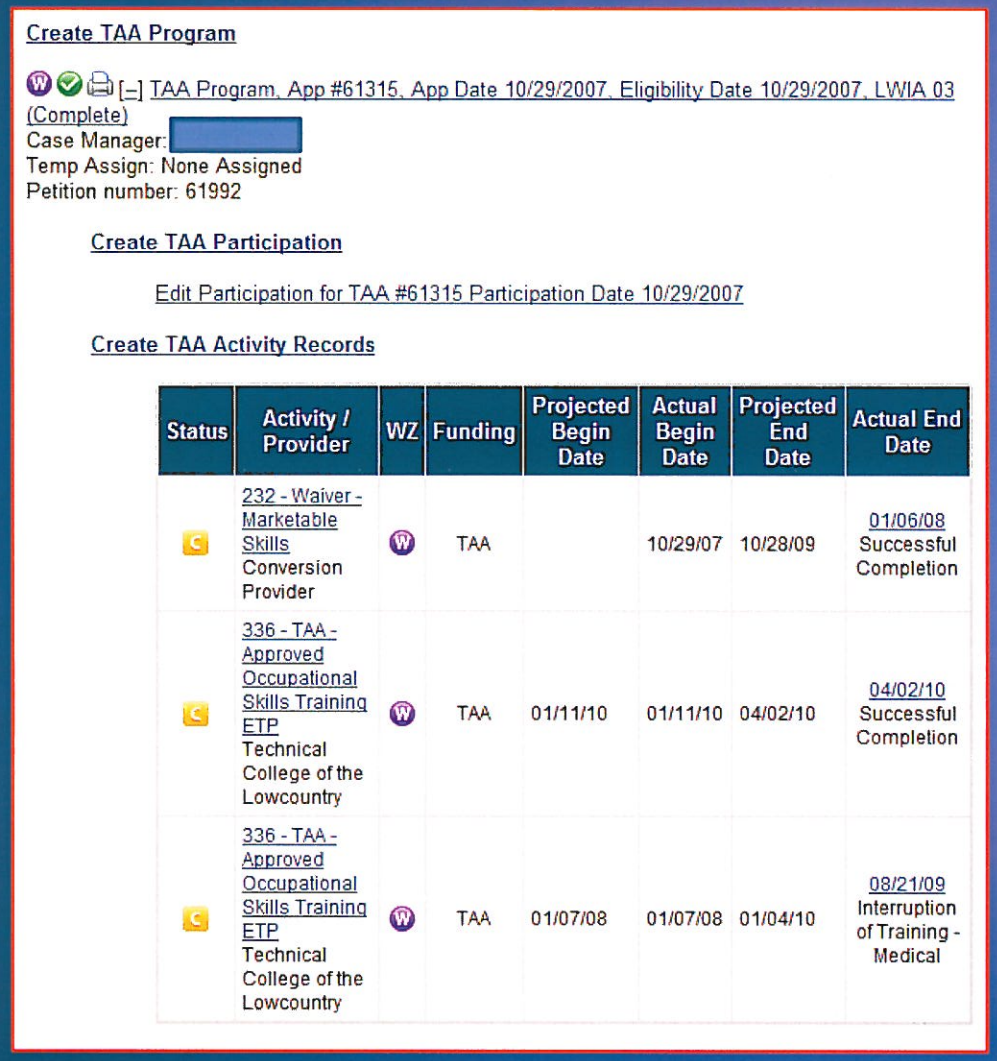
Amending the Training Plan

Remember:

The amended training plan must be printed and signed by both the participant and the case manager.

A copy of each amended plan must be kept in the participant's hard file.

Correcting the Activity Code



Create TAA Program

[–] TAA Program, App #61315, App Date 10/29/2007, Eligibility Date 10/29/2007, LWIA 03 (Complete)
Case Manager:
Temp Assign: None Assigned
Petition number: 61992

Create TAA Participation

Edit Participation for TAA #61315 Participation Date 10/29/2007

Create TAA Activity Records

Status	Activity / Provider	WZ	Funding	Projected Begin Date	Actual Begin Date	Projected End Date	Actual End Date
	232 - Waiver - Marketable Skills Conversion Provider		TAA		10/29/07	10/28/09	01/06/08 Successful Completion
	336 - TAA - Approved Occupational Skills Training ETP Technical College of the Lowcountry		TAA	01/11/10	01/11/10	04/02/10	04/02/10 Successful Completion
	336 - TAA - Approved Occupational Skills Training ETP Technical College of the Lowcountry		TAA	01/07/08	01/07/08	01/04/10	08/21/09 Interruption of Training - Medical

- The TAA-approved training activity code must be closed out using one of the three "Interruption of Training" codes.
- A second activity must be created for the additional training period.

Questions?...

...call me.

Silvia A. Middleton
State TAA Coordinator | SC Department of Employment and Workforce
1550 Gadsden Street | Columbia, SC 29201
P (803) 737 2583 | TTY 711 | F (803) 737-2119