
GST MICHIGAN WORKS! POLICY 15-08 change 3

TO: Chief Executive of Sub-Recipients and Agency Staff

FROM: Jody Kerbyson, CEO

SUBJECT: Procedure for monitoring the satisfactory progress and participation of a training candidate to ensure Benchmark compliance.

EFFECTIVE: December 10, 2021

PROGRAMS AFFECTED: All Trade Adjustment Assistance (TAA) Acts

REFERENCES: Trade Comprehensive Manual (TAA) (Modified- May 19, 2019)

RESCISSIONS: PI 15-08 change 2

BACKGROUND: TAA approved training participants now have a federal mandatory benchmarking timeframe. Agency Staff are to ensure a benchmark review is occurring every 60 days. Training benchmarks strengthen and standardize case management efforts, provide early intervention and allow for the modification of training plans in jeopardy of failing to increase training completion and credentials.

POLICY: Training benchmarks are established at the start of training of adversely affected workers enrolled in TAAEA of 2011, Reversion 2014, TAARA 2015, TAA 2020 Final Rule and TAA Reversion 2021 TAA-approved training. Training benchmark reviews must be documented on the Form TAA-306 Benchmark Report. The training benchmark review report must be filled out by the training provider every 60 days, data entered in OSMIS and kept in the participant's file. The two components of successful benchmarking are listed below:

- Maintaining satisfactory academic standing (not on probation or determined to be "at risk" by the instructor or training institution) and
- On schedule to complete training within the timeframe identified in the approved training plan.

A Training Plan and IEP/ISS are developed so both the staff and the participant have a clear understanding of what maintaining "satisfactory academic standing" and "on schedule to complete training" is for that participant. Satisfactory participation is defined as attending scheduled classes and activities to maintain in good standing academically.

These benchmarks must be flexible enough to allow for some variability (e.g., a single course failure or missed week of attendance that may be excused) and are both practical and measurable enough to allow administration across a broad spectrum of training scenarios.

In addition to the TAA-306 Benchmark Report every 60 days, Agency staff are required to ensure satisfactory progress and participation are monitored. The following documents are required to be collected and maintained in the participant's file.

- 1.) **Grade/Progress Reports** (midterms, end of semester grades, instructor verification of progress). The staff assigned to the participant will review the reports to ensure that the courses being taken are assisting in achieving the objectives identified in the training plan. All contacts, including receipt of reports, will be recorded in case notes in OSMIS and hard copy grades or progress reports will be placed in the file.
- 2.) **Attendance/Satisfactory Participation.** Attendance will be monitored using TAA 307- Training Attendance Report. Attendance will be turned in biweekly/monthly to agency staff, with the hard copy placed in the file. Attendance will be collected whether they are receiving mileage or not. Failure to attend can be excused when there is a “justifiable cause”. Absence caused by factors beyond the worker’s control such as weather, illness or transportation issues may be excusable. Each case must be reviewed individually, keeping in mind the goal of training completion.

Failed Training Benchmarks

1st Failed Benchmark: Participants who have failed one or both, of the benchmarks will be sent a notice of “Notice of Failed Benchmark” (Attachment A) by their assigned staff member. Furthermore, the staff will schedule an appointment to discuss the issues. A written corrective action plan will be developed. This plan should be signed by both the participant and staff. The participant should talk with the school advisor and request a new document from the school assuring the participant can complete their training program within specified time frame. If the participant refuses to correct this failed benchmark, staff are to proceed to 2nd Failed benchmark procedure.

This includes participants who fail to turn in their Training Benchmark reviews. Staff should case note all attempts to obtain benchmark documentation including verbal and written warnings. A new 60-day benchmark interval begins when the present benchmark documentation is collected and entered into OSMIS.

2nd Failed Benchmark: If there is a second occurrence of unacceptable progress, the second failed benchmark will result in a modification of the training plan or removal from the training program.

Since the objective of TAA training is the attainment of marketable skills and gainful employment, every effort should be made to assist individuals in completing their training program. However, if it is apparent that the individual will be unable to complete training within the specified time limits, steps must be taken to remove the individual from training.

Contract Modification: A contract modification to the original plan is to be documented on the TAA-304 Training Contract Modification. Supporting documentation should be received from the school advisor, clearly showing the new training curriculum and timeframe for completion. 60 Day training benchmarks will resume and the participant will be held to the same non-compliance procedure for the duration of the training plan. A Form 319- Participant Status Report, is to be used to notify the TRA Unit if the timeframe for training is being amended.

Removal from Training: When a participant has a second failed benchmark review and there is no options for modification, removal from training is necessary. The TAA 319 should be sent to the TRA Unit indicating the training is ending. A written notice TAA 501 Notice of Determination must be sent to the participant. If the participant wants to appeal the decision, a TAA 502 Request for Redetermination form is given to the participant.

If the participant is receiving Completion TRA and refuses to modify the training plan, the agency staff should indicate the refusal on the Form UIA-6364: Request for Determination of Entitlement to Completion TRA and fax it to the TRA Unit.

OSMIS for TAAEA

Enter the establishment of benchmarks on the OSMIS Benchmark Review Section. Answer the two questions on the training activity screen under the heading "Training Benchmarks": Expected to maintain satisfactory standing, and Expected to remain on schedule to complete training. Each question includes yes/no indicator. For the benchmark reviews, enter: Review Date, confirmation that the individual is maintaining satisfactory academic standing, and confirmation that the individual is scheduled to complete training within timeframe specified in contract. If the participant is encountering difficulties case note the intervention to be provided.

All benchmark information entered into OSMIS must have hardcopy documentation in the file.

Training benchmarks for TAAEA 2002 and 2009 are not mandated by the state, however this is a best practice and it is highly recommended to done on all GST trade participants.

ACTION:

GST Michigan Works! Service Providers and Agency staff shall take the appropriate actions necessary to ensure all participants and their files meet all the directives of this policy issuance. Service Provider officials shall ensure the information contained in this policy is disseminated to all appropriate staff.

INQUIRES:

Questions regarding this policy issuance should be directed to JulAnn Kuenzli (989)-635-3561 ext. 230 or Shakesha Watson (810) 233-5974 ext. 510



12-10-2021

SIGNED:

Jody Kerbyson, CEO

Date

Attachments

NOTICE OF FAILED BENCHMARK

Date:

To:

From:

The Trade Adjustment Assistance Programs require tracking of attendance and satisfactory progress in training programs. Monitoring attendance and progress allows for early intervention if needed to ensure positive outcomes.

Upon review of Satisfactory Progress form and/or reports from your training institution (mid-term grades/letter of academic progress from instructor), it has come to our attention that there is an issue with one of the following:

_____ Unsatisfactory attendance

_____ Unsatisfactory progress (detail the course(s) being addressed)

_____ No documentation has been submitted to show Satisfactory Progress

This letter constitutes a Written Warning and further failure in either attendance or progress will result in a modification to your training plan. Please contact me to discuss future steps with you to avoid any negative outcomes. I look forward to hearing from you soon.