

# U.S. Department of Labor

Office of Inspector General—Office of Audit

**EMPLOYMENT AND TRAINING  
ADMINISTRATION**



## **GPRA DATA VALIDATION REVIEW TRADE ADJUSTMENT ASSISTANCE PROGRAM**

**Date Issued: September 15, 2005  
Report Number: 22-05-007-03-330**

## BRIEFLY...

**Highlights of Report Number: 22-05-007-03-330 to the Assistant Secretary for Employment and Training. September 2005**

### WHY READ THE REPORT

The Trade Adjustment Assistance (TAA) program, which is administered by Labor's Employment and Training Administration (ETA), was established in 1974 to assist individuals who became unemployed as a result of increased imports return to suitable employment. TAA's goal is to increase the employment, retention, and earnings replacement of workers dislocated because of trade.

The Labor Department relies on participant data, submitted quarterly by the states, to assess whether or not a program is achieving its yearly goals and if changes are needed to make it more effective. Congress may review performance information in making decisions about future program funding.

### WHY OIG DID THE REVIEW

We conducted our review to determine the completeness and reliability of the CY 2003 data used to support the FY 2003 performance goal 2.3B (changed in FY 2004 to 1.1G): Increase the employment, retention, and earnings replacement of workers dislocated in important part because of trade and who receive trade adjustment assistance benefits. We selected TAA data from CY 2003 for our review. Four states and 150 exiters were judgmentally selected for our review.

### READ THE FULL REPORT

To view the report, including the scope, methodology, and full agency response, go to:

<http://www.oig.dol.gov/publicreports/oa/2005/22-05-007-03-330.pdf>.

September 2005

## GPRA Data Validation Review, Trade Adjustment Assistance Program

### WHAT OIG FOUND

Based on our review of the eight CY 2003 data elements used to report GPRA performance goal 2.3B, we verified 7 data elements to source documentation found in participant files. However, we found the eighth element, "date of exit," could not be verified due to the following reasons:

- The "date of exit" element was recorded as an anticipated date, not the last date of services as required by TAA guidelines.
- The State Workforce Agencies (SWAs) did not have source documentation available to verify the "date of exit" element.

Five of the seven data elements verified to source documentation were dependent on the "date of exit" and, therefore, were not complete or reliable.

### WHAT OIG RECOMMENDED

To improve the completeness and reliability of Trade Adjustment Assistance program's performance data, we recommend the Assistant Secretary for Employment and Training ensure the TAA Program:

- Collects and records the participant's actual "date of exit" according to ETA's written definition.
- Properly manages and maintains source documentation to support the actual "date of exit," and makes it readily available for review.

ETA concurred with the recommendations and provided information about actions taken and planned to address the recommendations.

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## Executive Summary

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The Office of Inspector General (OIG) conducted a review of calendar year 2003 data collected and reported from the Trade Act Participant Report (TAPR) of the Employment and Training Administration's (ETA) Trade Adjustment Assistance (TAA) program. TAA was established in 1974 to assist individuals who have become unemployed as a result of increased imports from, or shifts in production to, foreign countries. ETA administers the program and the State Workforce Agencies (SWA) serve as the agents operating the program.

We conducted our review to determine the completeness and reliability of the CY 2003 data used to support the performance goal 2.3B. Since ETA implemented its Data Validation Initiative in August 2003, states are required to attest to the accuracy of the data they submit to ETA. ETA compiles the data and computes and reports the final results in the Department of Labor (DOL) Annual Performance and Accountability Report. OIG relied on CY 2003 TAPR data to compile the schedule of TAA performance data and results for CY 2003, specifically for DOL's Government Performance and Results Act (GPRA) goal related to increasing the employment, retention, and earnings replacement of TAA participants. The accuracy of the reported results for the performance goal relies on the validity of the TAPR data elements.

### Results

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Based on our review, we concluded that for the states included in our sample, the participant "date of exit" data element was unsupported by source documentation. Accurate recording of the exit data is critical because the TAA GPRA goal addresses participant employment status and earnings in the first and third quarters after exit. The recording of the "date of exit" element is done at the participant's intake of a training program based on the anticipated date that training will end. However, there was no source documentation, in any of the 150 exiter case files reviewed in the 4 states visited, to verify that the participant completed the program on the recorded date of exit. In addition, five of the other seven data elements used by ETA to support Performance Goal 2.3B were dependent on the "date of exit" and, therefore, were not complete or reliable.

### Recommendations

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To improve the completeness and reliability of the Trade Adjustment Assistance program's performance data, we recommend the Assistant Secretary for Employment and Training ensure the TAA Program:

- Collects and records the participant's actual "date of exit" according to ETA's written definition.

- Properly manages and maintains source documentation to support the actual “date of exit,” and makes it readily available for review.

#### **Agency Response**

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In response to our draft report, the Assistant Secretary for Employment and Training stated that ETA has clarified the “date of exit” definition in Training and Employment Guidance Letter (TEGL) 32-04. Additionally, ETA has recently received OMB approval of a revision to the TAPR that reflects common performance measures and reporting definitions for all employment and training programs. As part of common measures implementation, ETA will also be issuing revised reporting instructions to the states, which will provide additional explanation of the “date of exit.” Finally, ETA intends to issue additional guidance to the states addressing the specific finding that states are entering the “date of exit” at intake based on the date it is anticipated that training will end.

The ETA’s response in its entirety is attached as Appendix D.

#### **OIG Conclusion**

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We agree with ETA’s planned corrective actions. The recommendations are resolved and open. They will be closed upon OIG’s receipt and review of revised reporting instructions that further explain the “date of exit” and identify the documentation that states must maintain to support the recorded “date of exit.”



## Assistant Inspector General's Report

Emily Stover DeRocco  
Assistant Secretary for  
Employment and Training

The Trade Adjustment Assistance (TAA) program's purpose is to assist individuals, who become unemployed as a result of increased imports, return to suitable employment. The Employment and Training Administration (ETA) administers the program and each state designates a State Workforce Agency (SWA) to serve as the Department of Labor's (DOL) agent in administering the program.

The FY 2003 TAA program performance goal, reported in the DOL Annual Performance and Accountability Report as performance goal number 2.3B, is as follows:

Increase the employment, retention, and earnings replacement of workers dislocated in important part because of trade and who receive trade adjustment assistance benefits.

- 78% will be employed in the first quarter after program exit;
- 88% of those employed in the first quarter after program exit will be employed in the third quarter after program exit; and
- Those who are employed in the third quarter after program exit will earn, on average, 90% of their pre-separation earnings.

Program performance data to support this goal is collected at the local SWA office level. ETA compiles the data and computes and reports the final results in the DOL Annual Performance and Accountability Report. The data elements must be accurate to ensure the reliability of the data reported.

The TAPR encompasses 49 data elements; however, our objective was to review the 8 data elements used to report the results of the performance goal 2.3B. Office of Inspector General (OIG) auditors reviewed the three data elements related to date of exit, including: the last date participants received TAA or other Workforce Investment Act (WIA) Title I services; and whether or not the participant was employed in the first and third full quarters after the exit date. The five data elements related to reported earnings include earnings in the first, second and third full quarters after exit and the second and third quarters prior to the participant's most recent qualifying separation.

The auditors used these data elements to determine the completeness and reliability of the DOL CY 2003 performance data for TAA. Without complete and reliable participant data, ETA cannot effectively measure its progress toward achieving the GPRA goal related to increasing the employment retention and earnings replacement of TAA participants.

We obtained the quarterly TAPRs of TAA performance summary data from ETA for CY 2003. The auditors compiled the data received, and using ETA's formulas, calculated results based on CY 2003 data. (See Exhibit A.)

Our review was conducted in accordance with the attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestations contained in Government Auditing Standards, issued by the Comptroller General of the United States. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on the TAA performance data and results. Accordingly, we do not express such an opinion.

Based on our review, we concluded that for the states included in our sample, the participant "date of exit" data element, was unsupported by source documentation. Accurate recording of the exit data is critical because the TAA GPRA goal addresses participant employment status and earnings in the first and third quarters after exit. The recording of the "date of exit" element is done at the participant's intake of a training program based on the anticipated date that training will end. However, there was no source documentation, in any of the 150 exiter case files reviewed in the 4 states visited, to verify that the participant completed the program on the recorded date of exit.

We were able to verify to source documents the data used to report the program results for the other seven data elements; however, the accuracy of the data for five of these seven elements is dependent upon the accuracy of the "date of exit" data element. For example, the "date of exit" must be accurate to determine if a participant is employed in the first quarter after exit. Since data from these elements are used by ETA to support Performance Goal 2.3B, we were unable to determine the completeness and reliability of the reported performance data for the TAA program.

## **FINDING AND RECOMMENDATIONS**

### **Objective – Is CY 2003 GPRA performance data for TAA complete and reliable?**

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#### **Finding - TAA's "date of exit" element could not be substantiated due to lack of source documentation.**

SWA personnel were unable to provide source documentation to verify that the recorded "date of exit" element was accurate for any of the 150 case files reviewed in the 4 states visited. This is due to the fact that the "date of exit" element is recorded as an anticipated date at intake and there was no documentation to verify that the participant completed the training on the recorded date. This method is not consistent



with ETA's written guidelines for recording the "date of exit" data element. ETA's written guidelines require documentation of the last date the participant received Trade Act services.

The main criteria that govern the work performed are as follows:

- OMB Circular No. A-11 (July 16, 2004), Section 230.2 which states that agencies are required to assess the completeness and reliability of performance data reported;
- OMB A-123, which requires agency managers to incorporate control strategies, plans, guidance and procedures that govern their program's operations;
- ETA Training and Employment Guidance letter No. 11-00, which requires documentation of last date on which Trade Act services or WIA Title I services received by participants; and
- Government Accountability Office (GAO) Standards for Internal Control in the Federal Government November 1999.

One of the five standards for internal control, according to the GAO Standards for Internal Control in the Federal Government, dated November 1999, is "control activities." An example of a control activity that is common to all agencies is the appropriate documentation of transactions. Specifically per the GAO standard:

Internal control and all transactions and other significant events need to be clearly documented, and the documentation should be readily available for examination. The documentation should appear in management directives, administrative policies, or operating manuals and may be in paper or electric form. All documentation and records should be properly managed and maintained.

TAA staff acknowledged an issue with recording this element, because of the difficulties following up with participants, such as participants who might have left the program early. In addition, staff at one SWA discussed issues with obtaining follow-up information from WIA regarding participants that leave TAA and go to WIA for additional services. As a result of these issues, the SWA personnel were unable to provide auditors with source documentation to validate the recorded date of exit.

We were able to verify to source documents the data used to report the program results for seven of the eight data elements; however, the accuracy of the data for five of these seven elements is dependent upon the accuracy of the "date of exit" data element. For example, the "date of exit" must be accurate to determine if a participant is employed in the first quarter after exit. Since data from these elements are used by ETA to support Performance Goal 2.3B, we were unable to determine the completeness and reliability of the reported performance data for the TAA program.

## Recommendations

To improve the completeness and reliability of Trade Adjustment Assistance program's performance data, we recommend the Assistant Secretary for Employment and Training ensure the TAA Program:

- Collects and records the participant's actual "date of exit" according to ETA's written definition.
- Properly manages and maintains source documentation to support the actual "date of exit," and makes it readily available for review.

## Agency Response

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In response to our draft report, the Assistant Secretary for Employment and Training stated that ETA has clarified the "date of exit" definition in Training and Employment Guidance Letter (TEGL) 32-04, *State Accomplishment of Performance Goals for Trade Adjustment Assistance (TAA) and North American Free Trade Agreement Transitional Adjustment Assistance (NAFTA-TAA) Participants*, issued on May 17, 2005.

On July 15, 2005, ETA issued TEGL 3-03 Change 3, *Revision to the Data Validation Policy for Employment and Training Programs for Program Year 2004*, which reiterated the requirement to validate the "date of exit," which was first required in TEGL 3-03, Change 1, issued on August 20, 2004. TEGL 3-03, Change 3, also provided a list of source documentation requirements for each of the data elements being validated, including the "date of exit."

ETA has recently received OMB approval of a revision to the TAPR that reflects common performance measures and reporting definitions for all employment and training programs as outlined in TEGL 28-04, *Common Measures Policy*. As part of this policy guidance, there is a revised, common definition for "date of exit." Once a participant has not received a service funded by the TAA program or a partner program for 90 consecutive calendar days and has no planned gaps in service and is not scheduled for future services, the date of exit is applied retroactively to the last day on which the individual received a service funded by the TAA program or a partner program. Using the same exit date where the TAA participant is served by multiple ETA programs should serve to reduce confusion over the correct date. The TAA program will move to the common measures beginning with the report for the first quarter of FY 2006.

As part of the implementation of the common measures, ETA has recently completed a series of three national training sessions for all states on reporting definitions and documentation requirements for outcome reports, including the TAPR. Correct use of the "date of exit" was highlighted during those training sessions.

As part of common measures implementation, ETA will also be issuing revised reporting instructions to the states, which will provide additional explanation of the "date of exit."

Finally, ETA intends to issue additional guidance to the states addressing the specific finding that states are entering the “date of exit” at intake based on the date it is anticipated that training will end. States will be reminded that they are required to report each participant’s actual date of exit, not an anticipated date of exit. ETA will also use the guidance to reemphasize the source documentation requirements for each state related to the “date of exit.”

**OIG Conclusion**

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We agree with ETA’s planned corrective actions. The recommendations are resolved and open. They will be closed upon OIG’s receipt and review of revised reporting instructions that further explain the “date of exit” and identify the documentation that states must maintain to support the recorded “date of exit.”



Elliot P. Lewis  
April 6, 2005

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# **Exhibit**

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**EXHIBIT A**

**TRADE ADJUSTMENT ASSISTANCE PERFORMANCE DATA AND  
RESULTS FOR CALENDAR YEAR 2003**

**Summary Data (by quarter)**

Calendar Year	Quarter ending			
	3/31/2003	6/30/2003	9/30/2003	12/31/2003
Number of exiters	7612	6966	9149	8066
Number of exiters employed in the first quarter after exit	4603	4020	5575	4911
Number of exiters employed in the first quarter after exit who are also employed in the third quarter after exit	4059	3578	4985	4388
Average earnings in the second and third quarter after program exit	\$4,798	\$5,151	\$5,026	\$5,064

Computations	Quarter ending				Average
	3/31/2003	6/30/2003	9/30/2003	12/31/2003	
Entered Employment	60%	58%	61%	61%	60%
Retention	88%	89%	89%	89%	89%
Wage Replacement	76%	74%	70%	73%	73%

**Performance goal indicators computation definitions:**

**Indicator 1 (Entered Employment)**

Number employed in the first quarter after exit / total exiters

**Indicator 2 (Retention)**

Number employed in the first quarter after exit who are also employed in the third quarter / number employed in the first quarter after exit

**Indicator 3 (Wage Replacement)**

Average earnings in the second and third quarter after program exit / average earnings in the second and third quarter before layoff

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## **Appendices**

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APPENDIX A

**BACKGROUND**

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The Trade Adjustment Assistance (TAA) program was established under the Trade Act of 1974 (P.L. 93-618). Regulations governing the TAA program are found at 20 CFR, Chapter V, Part 617. TAA's purpose is "to assist individuals, who became unemployed as a result of increased imports, return to suitable employment."

ETA administers the TAA program and each state designates a state agency, usually the state workforce agency (SWA), to serve as DOL's agent in administering the program.

In order to qualify for TAA benefits, a displaced employee must be eligible. The first step is for one of the following entities to file a petition to determine certification eligibility; the company, the employees' union, or three individually displaced employees. Once the petition is filed, TAA initiates an investigation that lasts no longer than 40 days. During this investigation, TAA personnel contact the Human Resources department of the company in question to ascertain information as required by 29 CFR part 90. Once the investigation is completed, the petition is either accepted (eligible) or declined (ineligible). After eligibility is determined, it is the state's responsibility to notify the displaced workers of eligibility by mail (through a mailing list provided by the company) or through television and radio public service announcements. Once the displaced employee receives notification, he/she is able to apply for TAA benefits at the local office of the SWA.

In 1998, ETA implemented a new reporting method, the Trade Act Participant Report (TAPR), which is the record used by the SWA to collect and report the TAA participants' data submitted quarterly to ETA. Quarterly the SWA uploads the TAPR from its automated system into ETA's Enterprise Information Management System (EIMS). EIMS is an Oracle Internet based system that allows real time reporting of TAA's performance data. The TAPR must be submitted, by each SWA, to ETA's Office of Technology and Information Services (OTIS) via Internet. The TAPR is the mechanism for ETA's Division of Trade Adjustment Assistance (DTAA) to collect and report performance data and participant outcomes for the TAA program.

Training and Employment Guidance Letter No. 3-03 was issued August 20, 2003, to provide guidance on implementing the data validation policy for ETA programs. The accuracy and reliability of program reports submitted by states using Federal funds are fundamental elements of good public administration, and are necessary tools for maintaining and demonstrating system integrity. All states are required to submit reports or participant records to ETA and attest to the accuracy of their data. ETA has committed to the development and implementation of a data validation process in order to ensure the accuracy of data collected and reported on program activities and outcomes.

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**OBJECTIVE, SCOPE, METHODOLOGY, AND CRITERIA**

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**Objective**

To determine the completeness and reliability of DOL CY 2003, GPRA performance data for TAA.

**Scope and Methodology**

We conducted our review to determine the completeness and reliability of the CY 2003 data used to support the FY 2003 performance goal 2.3B (changed in FY 2004 to 1.1G). We selected TAA data from CY 2003 for our review. We obtained the quarterly TAPRs of TAA performance summary data from ETA for CY 2003. The auditors compiled the data received, and using ETA's formulas, calculated results based on CY 2003 data. (See Exhibit A.) The universe for data reported during CY 2003, included participants who exited the TAA program between October 2001 and September 2002. The number of exiters was obtained by quarter from the OTIS. In addition, a universe of participants for CY 2003 was obtained for the states from ETA's National Office. Once the auditors obtained the universe of participants, we contacted program administrators in the four states selected for review and requested the participant case files. The participant data provided by the states were used in the review without being subjected to audit or examination procedures.

Four states and 150 exiters were judgmentally selected for our review. The universe containing all states was divided into three strata, high, medium and low based on the number of exiters reported during the CY 2003. Two sites were selected from those states reporting a range of program exiters of more than 1,000, one site was selected from the states reporting a range of program exiters of 200-999 and the final site was selected from the states reporting a range of program exiters less than 200 for the CY 2003.

The auditors conducted interviews and reviewed 30 participant files in New Jersey and 40 participant files in each state of Georgia, Illinois and North Carolina. We did not issue reports to each state. Rather, we provided a Statement of Facts (SOF) on the information we gathered to ETA's DTAA program. ETA indicated agreement with the facts presented by signing the SOF.

The auditors' fieldwork was comprised of conducting tests to assess the completeness and reliability of the performance data. We selected 8 of the 49 data elements from the Trade Act Participant Report (TAPR) because they were the elements used to calculate the performance goal results. We verified the data reported in these eight data elements against source documentation provided by SWA personnel. In addition, we conducted interviews with ETA's National Office TAA program and Information Technology staff and SWA personnel. Weaknesses are discussed in the Assistant Inspector General's Report.

## **Criteria**

The main criteria that govern the work performed is as follows:

- OMB Circular No. A-11 (July 16, 2004), Section 230.2 which states that agencies are required to assess the completeness and reliability of performance data reported;
- OMB A-123, which requires agency managers to incorporate control strategies, plans, guidance and procedures that govern their program's operations;
- ETA Training and Employment Guidance letter No. 11-00, which requires documentation of last date on which Trade Act services or WIA Title I services received by participants; and
- GAO Standards for Internal Control in the Federal Government November 1999.

APPENDIX C

**ACRONYMS AND ABBREVIATIONS**

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CY	Calendar Year
DOL	Department of Labor
DTAA	Division of Trade Adjustment Assistance
EIMS	Enterprise Information Management System
ESL	English as a Second Language
ETA	Employment and Training Administration
FY	Fiscal Year
GAO	Government Accountability Office
GPRA	Government Performance and Results Act
OIG	Office of Inspector General
OJT	On-the-Job Training
OMB	Office of Management and Budget
OTIS	Office of Technology and Information Services
SWA	State Workforce Agency
SOF	Statement of Facts
TAA	Trade Adjustment Assistance
TAPR	Trade Act Participant Report
TRA	Trade Readjustment Allowance
UI	Unemployment Insurance
WIA	Workforce Investment Act

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## APPENDIX D

## AGENCY RESPONSE TO DRAFT REPORT

U.S. Department of Labor

Assistant Secretary for  
Employment and Training  
Washington, D.C. 20210

AUG 30 2005

MEMORANDUM FOR: Elliot P. Lewis  
Assistant Inspector General for Audit

FROM: Emily Stover DeRocco *Mason M. Busby / ESD*

SUBJECT: GPR Data Validation Review -  
Trade Adjustment Assistance Program  
Draft Audit Report No. 22-05-007-03-330

As a result of its GPR Data Validation Review of the Trade Adjustment Assistance (TAA) program, the Office of Inspector General (OIG) found that the "date of exit" for TAA participants could not be substantiated because it was unsupported by source documentation. In addition, the OIG made two recommendations for improving the completeness and reliability of TAA data.

**OIG Recommendation:** To improve the completeness and reliability of the Trade Adjustment Assistance program's performance data, we recommend the Assistant Secretary for Employment and Training ensure the TAA program:

- Collects and records the participant's actual "date of exit" according to ETA's written definition.
- Properly manages and maintains source documentation to support the actual "date of exit," and makes it readily available for review.

Response: The Employment and Training Administration (ETA) appreciates the hard work OIG staff put into the review. ETA concurs with the finding and recommendations. Several steps are being taken to ensure that the states administering the TAA program collect and record the actual "date of exit" for each participant and that the proper source documentation is maintained and available for review.

- In response to the findings shared by OIG staff at the exit conference, ETA clarified the "date of exit" definition in Training and Employment Guidance Letter (TEGL) 32-04, "State Accomplishment of Performance Goals for Trade Adjustment Assistance (TAA) and North American Free Trade Agreement Transitional Adjustment Assistance (NAFTA-TAA) Participants," issued on May 17, 2005.

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- In Fiscal Year (FY) 2003, ETA implemented a data validation initiative for the Trade Act Participant Report (TAPR). On July 15, 2005, ETA issued TEGL 3-03, Change 3, "Revision to the Data Validation Policy for Employment and Training Programs for Program Year 2004," which reiterated the requirement to validate the "date of exit," which was first required in TEGL 3-03, Change 1, issued on August 20, 2004. TEGL 3-03, Change 3, also provided a list of source documentation requirements for each of the data elements being validated, including the "date of exit." Required source documentation for the TAA "date of exit" includes documentation in the case file, the state MIS, or a WIA exit form.
- ETA has recently received OMB approval of a revision to the TAPR that reflects common performance measures and reporting definitions for all employment and training program as outlined in TEGL 28-04, "Common Measures Policy." As part of this policy guidance, there is a revised, common definition for "date of exit." Once a participant has not received a service funded by the TAA program or a partner program for 90 consecutive calendar days and has no planned gaps in service and is not scheduled for future services, the date of exit is applied retroactively to the last day on which the individual received a service funded by the TAA program or a partner program. Using the same exit date where the TAA participant is served by multiple ETA programs should serve to reduce confusion over the correct date. The TAA program will move to the common measures beginning with the report for the first quarter of FY 2006.
- As part of the implementation of the common measures, ETA has recently completed a series of three national training sessions for all states on reporting definitions and documentation requirements for outcome reports, including the TAPR. Correct use of the "date of exit" was highlighted during those training sessions.
- As part of common measures implementation, ETA will also be issuing revised reporting instructions to the states, which will provide additional explanation of the "date of exit."
- Finally, ETA intends to issue additional guidance to the states addressing the specific finding that states are entering the "date of exit" at intake based on the date it is anticipated that training will end. States will be reminded that they are required to report each participant's actual date of exit, not an anticipated date of exit. ETA will also use the guidance to reemphasize the source documentation requirements for each state related to the "date of exit."

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Again, thank you for bringing these issues to our attention. We will move expeditiously to address the "date of exit" issue. Our expectation is that reported outcomes by states will be enhanced, as appropriate attention is placed on the "date of exit."