



DEC - 7 2012

The Honorable Dennis Daugaard
Governor of South Dakota
500 East Capitol Avenue
Pierre, South Dakota 57501

Dear Governor Daugaard:

This letter provides approval of South Dakota's State Integrated Workforce Plan for Title I of the Workforce Investment Act (WIA), the Wagner-Peyser Act (W-P), including W-P Agricultural Outreach Plan, plans for coordination with Trade Adjustment Assistance (TAA), and Title V of the Older Americans Act. The Employment and Training Administration (ETA) received the State Integrated Workforce Plan on September 14, 2012. This letter also addresses South Dakota's WIA waiver requests.

Training and Employment Guidance Letter (TEGL) No. 21-11, issued on March 27, 2012, and TEGL No. 21-11, Change 1 issued on August 8, 2012 provide guidance for states to submit their State Workforce Plans and waivers for Program Year (PY) 2012 and beyond. We appreciate the State's responsiveness to this guidance.

Plan Review and Approval

ETA has reviewed the South Dakota State Integrated Workforce Plan in accordance with Title I of WIA, the Wagner-Peyser Act, the Trade Act (as amended), the corresponding regulations, the *State Integrated Workforce Plan Requirements for Workforce Investment Act Title I/Wagner-Peyser Act, and Department of Labor Workforce Programs* (<http://www.doleta.gov/usworkforce/wia-planning/docs/integrated-planning-guidance.pdf>), Title V of the Older Americans Act and corresponding regulations, TEGL No. 21-11, and the corresponding Change 1. Pursuant to 20 CFR 661.230(e), this letter constitutes a written determination under WIA Section 112 (29 USC 2822), and WIA section 501 (20 USC 9271) which pertains to State Unified Plans, that ETA is approving those portions of the South Dakota State Integrated Workforce Plan that relate to Title I of WIA, the Wagner-Peyser Act, and TAA for Program Years 2012-2016, July 1, 2012 through June 30, 2017. The annual W-P Agricultural Outreach Plan is approved for the period July 1, 2012 through June 30, 2013. The Senior Community Service Employment Program (SCSEP) State Plan has been reviewed by both ETA and the Administration on Aging, and is approved for Program Years 2012-2015, July 1, 2012 through

June 30, 2016. The State is eligible to receive WIA formula allotments for Adult, Dislocated Worker, and Youth programs, and W-P program allotments, effective July 1, 2012 through June 30, 2017.

Performance Levels

Each year, the Regional Administrator negotiates the Program Year's WIA and W-P performance goals with each state. As required by TEGEs No. 21-11 and 38-11 dated June 18, 2012, negotiations must be completed by December 31, 2012 for PY 2012. Once the final goals are established, the Regional Administrator's letter advising the State of the PY 2012 WIA and W-P final performance goals constitutes a modification to the State Workforce Plan. ETA will incorporate South Dakota's final performance goals for PY 2012 into the Regional and National Office copies of the State Integrated Workforce Plan. Please include these final PY 2012 goals in the State's official copy of the State Workforce Plan.

Waivers

As part of South Dakota's State Integrated Workforce Plan, the State submitted waiver requests for waivers of statutory and regulatory requirements under WIA (copy enclosed). The State's requests for waivers are written in the format identified in WIA Section 189(i)(4)(B) and 20 CFR 661.420(c). The disposition of the State's waiver requests is outlined below. This action is taken under the Secretary's authority at WIA Section 189(i) to waive certain requirements of WIA Title I, Subtitles B and E, and Sections 8-10 of the Wagner-Peyser Act.

Waiver of WIA Section 133(b)(4) to increase the allowable transfer amount between Adult and Dislocated Worker funding streams allocated to a local area.

The State requested a waiver to permit an increase in the amount a state is allowed to transfer between the Adult and Dislocated Worker funding streams. The State is granted this waiver through June 30, 2017. Under the waiver, transfer authority is limited to 50 percent. This limitation provides states flexibility while ensuring consistency with Congressional intent regarding the level of funding appropriated for the WIA Adult and Dislocated Worker programs.

Waiver to permit the State to replace the performance measures at WIA Section 136(b) with the common measures.

The State requested a waiver that allows the State to replace the 17 performance measures under WIA Section 136(b) with the common measures. The State is granted this waiver through June 30, 2017.

This waiver permits the State to negotiate and report WIA outcomes against the common performance measures only, rather than the performance measures described at WIA Section 136(b). The State will no longer negotiate and report to ETA on the following

WIA measures: WIA adult and dislocated worker credential rates; participant and employer customer satisfaction; older youth measures; and younger youth measures. The State will use the three adult common performance measures to negotiate goals and report outcomes for the WIA Adult and WIA Dislocated Worker programs. The State will use the three youth common performance measures to negotiate goals and report outcomes for the WIA Youth program. Workforce Investment Act Standardized Record Data system (WIASRD) item 619, Type of Recognized Credential, should be completed for each individual as appropriate, regardless of this waiver to report on common performance measure outcomes only.

Waiver of WIA Section 134(a) to permit local areas to use a portion of local funds for incumbent worker training.

The State requested a waiver to permit local areas to conduct allowable statewide activities as defined under WIA Section 134(a)(3) with local WIA formula funding, specifically incumbent worker training. The State is granted this waiver through June 30, 2017. Under this waiver, the State is permitted to allow local areas to use up to 10 percent of local Dislocated Worker funds and up to 10 percent of local Adult funds for incumbent worker training only as part of a layoff aversion strategy. Use of Adult funds must be restricted to serving lower income adults under this waiver. ETA believes limiting incumbent worker training to the specified level and requiring it to be a part of layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system. All training delivered under this waiver is restricted to skill attainment activities. Local areas must continue to conduct the required local employment and training activities at WIA Section 134(d), and the State is required to report performance outcomes for any individual served under this waiver in the Workforce Investment Act Standardized Record Data system (WIASRD), field 309. TEG L No. 26-09, Section 7A, "Workforce Investment Act (WIA) Waiver Policy and Waiver Decisions for PY 2009 and 2010" and TEG L No. 30-09, "Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion Using a Waiver" provide policy guidance related to implementation of this waiver.

Waiver of WIA Section 101(31)(B) to increase the employer reimbursement for on-the-job training.

The State requested a waiver to permit an increase in employer reimbursement for on-the-job training through a sliding scale based on the size of the business. The State is granted this waiver through June 30, 2017. Under the waiver, the following reimbursement amounts will be permitted: 1) up to 90 percent for employers with 50 or fewer employees, and 2) up to 75 percent for employers with 51-250 employees. For employers with more than 250 employees, the current statutory requirements (50 percent reimbursement) will continue to apply. When determining the funding source for on-the-job training, the State must use the appropriate program funds for the appropriate WIA-eligible population. The State and local area may provide on-the-job training to individuals over age 18 with WIA Adult funds and must provide priority to low-income

individuals when funds are limited; the State and local area may provide on-the-job training to dislocated workers with WIA Dislocated Worker funds. On-the-job training provided with statewide funds must serve WIA eligible individuals.

The approved waivers are incorporated by reference into the State's WIA Grant Agreement, as provided for under paragraph 3 of the executed Agreement, and are incorporated into the State Integrated Workforce Plan. A copy of this letter should be filed with the State's WIA Grant Agreement and with the approved State Plan. In addition, as described in TEGP No. 29-11, the State should address the impact these waivers have had on the State's performance in the WIA annual performance report, due on October 1 of each year.

We look forward to working together as you implement your State Integrated Workforce Plan for PY 2012 and beyond. We encourage your efforts in exploring the adoption of the American Job Center brand. We are available to provide technical assistance. If you have any questions related to the issues discussed above, please contact Bernie Cutter, the Federal Project Officer for South Dakota, at (972) 850-4618 or cutter.bernarda@dol.gov.

Sincerely,



Jane Oates
Assistant Secretary

Enclosures

cc: Joseph Juarez, Regional Administrator, ETA Dallas Regional Office
Bernie Cutter, Federal Project Officer for South Dakota

From: Cutter, Bernarda - ETA
To: WIA PLAN
Cc: Stuka, Frank - ETA; Martin, Bill - ETA
Subject: FW: State Plan
Date: Tuesday, November 06, 2012 12:16:17 PM

Please accept South Dakota's official WIA Integrated State Plan. The link is attached below. The State has posted the plan for public comments through the end of this week. Let me know if you have any questions.

http://dlr.sd.gov/workforce_training/wia_state_plan_2012.pdf

Bernie Cutter
Cutter.bernarda@dol.gov
972-850-4618

-----Original Message-----

From: Molseed, Bill [mailto:Bill.Molseed@state.sd.us]
Sent: Monday, November 05, 2012 4:38 PM
To: Cutter, Bernarda - ETA
Subject: State Plan

http://dlr.sd.gov/workforce_training/wia_state_plan_2012.pdf

Bernie: the link is to our revised state plan. We have it posted on the DLR website at: http://dlr.sd.gov/workforce_training/wia.aspx. Public comments will be taken through the end of this week. Let me know if you need any more clarifications. If not, I assume you will be processing the plan through channels and we should soon have an approval notice, correct?

SOUTH DAKOTA

WIA Waiver Requests

South Dakota requests the following waivers to WIA Title I. Approval of these waivers will allow the DLR to better serve the needs of the state, the business community, and our participants. The requested waivers include allowing local funds to support Incumbent worker training, allow a sliding scale for reimbursement payments to employers under On-the-Job training agreements, replace WIA performance measures with the Common Measures, and allow the transfer up to 50% of the funds available between the adult and dislocated worker programs.

1. Allow local funds to support Incumbent Worker Training

The DLR requests a waiver to allow up to 20 percent of WIA adult and dislocated worker local funds to be used to support Incumbent Worker Training activities as needed. A waiver will provide the state with the needed flexibility to meet the growing demand for innovative and effective incumbent worker training.

Statutory and/or regulatory requirements to be waived

The DLR requests a waiver from the provisions of WIA Section 134(a) use of funds for employment and training activities, and from the provisions of WIA 20 CFR §663.145 regarding the use of WIA Title I adult, youth and dislocated worker formula funds to allow local areas to operate an incumbent worker program as described under Section 134(a) (3) (A)(iv)(I) and 20 CFR §665.210 and §665.220.

Actions undertaken to remove state or local barriers

There are no state or local statutory or regulatory barriers to implementing the waiver.

Goals and expected programmatic outcomes of waiver

The state expects incumbent worker training funds to benefit key industries and local economies by providing a means to upgrade the skills critical to employers. Businesses are understandably cautious under the current state of the national economy. Many businesses are prudently proceeding with new methods, models, and markets in an attempt to stabilize their organization and to position themselves for growth. By doing so, they are investing in their company and reducing the risk of layoff. This waiver will provide the DLR the ability to respond to the needs of business and workers for upgraded skills. This waiver will help business to retain workers which stabilizes the local and state economy, and brings a cost savings to the Unemployment Insurance system. By upgrading the skills of incumbent workers, they move into more specialized jobs within the industry thereby creating new job possibilities for the unemployed job seeker. This waiver is particularly important to small businesses which traditionally experience greater difficulty in hiring and retaining qualified workers.

Funds authorized under an approved waiver will be used for the targeted industries identified by the DLR and the Governor's Office of Economic Development. Targeted industries will be those with high-demand and high-growth potential. Approved projects will result in job retention, skill development, and wage growth. Industries currently identified are: Bio-Science,

Manufacturing, Renewable Energy, Information Technology, Value-added Agriculture, Financial Services, Professional Business Services, and the Fire-arms, shooting, and hunting industries. Specific occupations within these industries and others we may target include: specialty trades, mechanics, sales representatives (non-retail), truck drivers, first-line supervisors, welders, accounting/finance, nursing, teachers, information technology, and engineering. All training will be agreed upon between the employer and the DLR. A written plan of training will identify the scope of training, skill areas, training outline, workers to be trained, duration, and cost of the training.

The DLR will develop policies and procedures for implementation on approval of this waiver request. We will seek best practice information from our U.S. DOL Regional Office to ensure compliance and to create an efficient process. Employers will be made aware of the project and have an opportunity to apply for funding. With limited funds available, the DLR will consider applications on the greater impact of the investment and prospects for new employees hired as incumbents move into the more specialized jobs. Approval of any projects will be made by the DLR. The DLR local offices will deliver this program to employers in their service area and make available all appropriate One-Stop assistance.

An approved waiver will avert layoffs and expand employment opportunities. This waiver request is employer driven and responds to changes in market conditions and to the introduction of new technology into the workplace. This waiver promotes maximum investment of limited funds, increase levels of service, and will strengthen local economies by focusing on employer and worker competitiveness through skills upgrade training.

Individuals impacted by the waiver

Employers and incumbent workers will be impacted by the waiver. Employers will have a qualified workforce to remain competitive. Workers will keep good jobs, improve their skills, and increased confidence they can compete in a technologically sophisticated, knowledge-based global economy.

Process for monitoring progress in implementation

The state will monitor all activity funded under this waiver to ensure program and financial accountability. State and local staff will be involved with this review process. The state will establish performance measures and standards to assess the effectiveness and efficiency of the activities allowed under this waiver. It is expected the standards will include, but not be limited to, demonstration of one or more of the following categories: increased retention, increased earnings, increased productivity, reduced turnover, and new hires. Activity under this waiver will be incorporated with the DLR's monitoring procedures, including a periodic review of how well the measures/standards are being met. Local delivery staff will be trained in how to conduct a review of the incumbent worker training program. Employers will have clear information on state expectations including required documentation and validation of the training, compliance with this waiver, and the rules and regulations of the state's WIA program.

Notice to affected local boards

South Dakota has been designated as a single service area state with a single state board. There are no local boards other than the WDC. Authority has been given to the DLR to act on behalf of the council and submit this waiver request.

Public Comment

Notice has been posted to the DLR website for public comment. The web link to the official posting is: <http://DLR.sd.gov/>. The notice is also posted at the DLR central office. All comments received will be reviewed and included where appropriate.

2. Allow sliding scale for reimbursement on approved On-the-Job Training contracts

The DLR requests a waiver to allow a sliding scale for reimbursement to employers utilizing an approved On-the-Job Training (OJT) contract. This waiver will support an increased use of OJTs and help program participants move into good jobs. The request is to utilize a sliding scale of reimbursement to the employer of up to 90 percent of the wage rate for the extraordinary costs associated with training, additional supervision, and lower productivity of the new employee. Approval of all OJT agreements will be consistent with DLR policy to provide training for occupations that are consistent with targeted industry sectors, high growth-high demand occupations, and meet the needs of the individual participant based on an assessment and fully developed employment plan.

The DLR will develop policies and procedures for implementation on approval of this waiver request. We will seek best practice information from our U.S. DOL Regional Office to ensure compliance and to create an efficient process. Employers will be made aware of the program through outreach by the DLR local offices. All OJTs under this agreement will follow the state WIA policies for appropriateness and compliance. OJTs will be arranged for the targeted industries identified by the DLR and the Governor's Office of Economic Development and high growth high demand occupations. All OJTs will be based on an individual assessment and employment plan.

The approved waiver will provide a sliding scale of reimbursement to the employer for the extraordinary costs as defined by the law, based on the following criteria:

- Up to 90 percent: Employers with 50 or fewer employees
- Up to 75 percent: Employers with 51-250 employees
- Up to 50 percent: Employers with more than 250 employees

The sliding scale will increase employer participation in OJTs and increase the training opportunities for WIA participants. The DLR will issue policy guidance regarding implementation of the sliding scale which will adhere to the principles of training workers in high-demand, higher skill, and higher wage occupations.

Statutory and/or regulatory requirements to be waived

The request is to waive WIA Section 101(31)(B) to provide reimbursement to the employer for OJT of up to 50 percent of the wage rate of the participant, and for the extraordinary costs of providing for the training and additional supervision related to the training.

Actions undertaken to remove state or local barriers

There are no state or local statutory or regulatory barriers to implementing the waiver.

Goals and expected programmatic outcomes of waiver

This use of this waiver will focus on the following goals and outcomes:

- Create additional opportunities for new workers, unemployed workers, and underemployed workers to return to full-time employment;
- Increase business usage of the workforce system through incentives;
- Maximize the flexibility of the state to respond to local needs and to ensure the training needs of business and job seekers are met.

Individuals impacted by the waiver

Individuals impacted by the approval of the requested waiver include:

- Unemployed and underemployed workers who do not have transferrable or marketable skills;
- Individuals entering the workforce for the first time;
- Hard-to-serve, low-income youth who are unable to compete for limited job openings;
- Businesses needing to retain current workers and/or hire additional workers to sustain their productivity;
- Eligible individuals most likely to benefit are those who have multiple barriers to employment, low basic skills, or limited English language proficiency.

Process for monitoring progress in implementation

The state will monitor all activity funded under this waiver to ensure program and financial accountability. State and local staff will be involved with this review process. The state will assess the effectiveness and efficiency of the activities allowed under this waiver. It is expected the standards will include, but not be limited to, demonstration: increased retention, increased earnings, increased productivity. Activity under this waiver will be incorporated with the DLR's monitoring procedures, including a periodic review of how well the measures/standards are being met. Local delivery staff will be trained in how to conduct a review of the incumbent worker training program. Employers will have clear information on state expectations including required documentation and validation of the training, compliance with this waiver, and the rules and regulations of the state's WIA program.

Notice to affected local boards

South Dakota has been designated as a single service area state with a single state board. There are no local boards other than the WDC, with authority given to the DLR to submit this request.

Public Comment

Notice has been posted to the DLR website for public comment at: <http://DLR.sd.gov/>. The notice is also posted at the DLR's central office. All comments received will be reviewed and included where appropriate.

3. Waive performance measures and replace with the Common Measures

The DLR is requesting continuance of the previously approved waiver of the performance measures for employment and training activities under the WIA and to replace them with the common measures as authorized by USDOL under TEGL 17-05. Our intent with this waiver is to maintain the streamlined and simplified performance accountability system. Placing a focus on integrated service and reporting only Common Measures has reduced redundancy and lessened the burden of reporting 15 core measures and two satisfaction measures. A move to Common Measures has allowed program staff to focus on providing a quality service for employers and individual job seekers, rather than concentrating on an unwieldy methodology for tracking and reporting performance. Common Measures has provided for accountability, improved program management, and reduced associated costs.

Statutory and Regulatory requirements to be waived

WIA established 17 indicators of performance under Section 136 (b) of WIA. Regulations for WIA authorize waivers under 20 CFR 661.410. By minimizing the different reporting and performance requirements, common measures foster integration of service delivery, reduce barriers to cooperation among programs and enhance the effectiveness of the workforce system. The proposed waiver will simplify and streamline the performance accountability system.

State or Local Statutory or Regulatory Barriers

There are no state or local barriers to implementing the requested waiver.

Goals of the Waiver and Programmatic Outcomes

The essential benefit is a simplified and efficient performance measurement system. The waiver will result in continuing a cost effective and understandable methodology for our partners and service providers. The waiver will present reduced paperwork and staff time associated with data collection, analysis, and reporting. Having an integrated system provides a more useful tool for administrative purposes leading to better coordination among partner programs serving the public.

South Dakota has a highly integrated system of employment services. Continuing Common Measures certainly enhances our effective delivery model. Aligning W-P and WIA performance offers a comprehensive service with common goals.

Common performance measures and the data collected provide needed information to oversee the workforce investment system in our state. This enhances our ability to assess the impact of our workforce development efforts. Utilizing Common Measures provides a clear understanding of federal and state expectations for performance.

The move to Common Measures has improved WIA service to the state and provides accurate information to the public, our partners, and Congress. This has demonstrated we are meeting the needs of business and job seekers while contributing to the economic growth of our state and nation.

Individuals affected by the waiver

Adopting Common Measures will have a very positive impact on the management of programs and delivery of service. All customers of the state's workforce system will benefit from implementation of the waiver.

Process to monitor implementation

The DLR is the administrative entity for W-P and WIA in the state. The DLR has monitored the implementation and impact of the waiver as we work toward the anticipated outcomes. This is accomplished through performance reporting and discussions with our program staff and employment partners. State oversight and evaluation identifies any concerns and takes action to address issues. State policies have been modified as we implemented Common Measures. The DLR has followed direction from the DOL Regional Office to establish definitions and processes consistent with the WIA law and regulations. This has established an effective system to capture data that is accurate and meets the need of the state and USDOL to evaluate outcomes.

The state monitors performance as prescribed by DOL. The state has instituted specific changes in data capture and reporting as directed by the Regional Office. Data validation is an important element of our process. Participant and outcome data is entered in the DLR management tracking system. State DLR staff monitor local activity through technology and conduct on-site services and monitors to ensure accuracy. Training of local staff is an on-going effort to ensure consistency and correct data entry.

Customer satisfaction is gauged through informal means. This includes anecdotal information provided by customers to local or state staff, comments from the public made at community meetings, or comments through the mail or email. All comments are duly reported to the state management team for consideration.

Notice to affected local boards

South Dakota has been designated as a single service area state with a single state board. There are no local boards other than the WDC, with authority given to the DLR to submit this request.

Public Comment

Opportunities for comment on the waiver request were made available to the public. The notice of waiver request was posted on the DLR website. No comments were received.

The request for continuing the Common Measures waiver was provided to the South Dakota Workforce Development Council as part of the State Plan prior to the regular scheduled July

meeting and posted on the agenda as an action item. The council did not receive any comments from the public. The council discussed the request and voted unanimously to accept the waiver and continue the use of Common Measures once approved by USDOL.

4. *Transfer of funds between WIA Adult and Dislocated Worker programs*

South Dakota requests continuance of the previously approved waiver for the authority to transfer up to 50% of funds allocated for a program year for WIA adult and dislocated worker employment and training activities between the two programs.

Statutory and Regulatory provisions to be waived:

WIA Section 133(b)(4) and WIA Regulations at 667.140 states a local board may transfer not more than 20 percent of the funds allocated to adult and dislocated worker employment and training activities.

Goals to be achieved by the waiver request:

Granting authority to transfer funds between adult and dislocated worker programs provides the flexibility for improvement of the statewide workforce investment system. Such authority will allow the state to better manage resources in response to the needs of our workforce. This flexibility will provide the best use of resources as the state strives for regional economic competitiveness through talent development.

South Dakota was fortunate not to have as severe of decline in our economy during the years of recession. The state did experience a doubling of the unemployment rate. This created a significant number of dislocated workers seeking services from the DLR programs. South Dakota is a minimum funded state which presents unique problems when trying to serve those in need. At that time, with the waiver to transfer funds between programs we were able to provide WIA services for those adults and dislocated workers. As the state has moved out of the grips of the economic downturn the number of dislocated worker has declined, but our number of WIA eligible adults continues to test the ability of current funding to meet the need of the eligible population. Approval of this waiver provides the necessary flexibility for the state to adjust funding streams to meet a specific demand. Allowing the state to adapt funding as necessary will result in better service to our customers and bring expanded employment and advancement opportunities. This is a positive step for the business community and our participants.

State of local statutory or regulatory barriers:

There are no state or local barriers to implementing this waiver request.

Description of the goals of the waiver and expected outcomes:

Transfer authority will allow the state to better respond to changes in the economy. The flexibility to transfer funds between adult and dislocated worker programs maximizes our ability to meet the economic needs of particular regions of the state for development of talent needed for economic growth.

Description of Individuals impacted by the Waiver:

Adults and dislocated workers eligible for the program will be positively impacted by the waiver through the flexibility to move significant funding to reflect actual needs of specific regions of the state.

Description of the process to monitor progress:

The DLR is the administrative agent for the WDC and will be responsible for approving and monitoring all transfer of funds.

Opportunity for local boards to comment on the waiver request:

As stated previously in this plan, South Dakota is a single local area with the WDC serving as the state and local board.

Public Comment on the waiver request:

This request for waivers is incorporated in the submission of the modification to the state plan for year five of the five year plan. The public has been invited to comment on the waiver request. The WDC have demonstrated support of the waiver through a regularly scheduled and public meeting soliciting comments on the waiver and plan.

Notice to affected local boards

South Dakota has been designated as a single service area state with a single state board. There are no local boards other than the WDC, with authority given to the DLR to submit this request.

Public Comment

Notice has been posted to the DLR website for public comment at: <http://DLR.sd.gov/>. The notice is also posted at the DLR's central office. All comments received will be reviewed and included where appropriate.

Trade Adjustment Assistance

Services for dislocated workers are easily coordinated in South Dakota. The DLR, dislocated worker unit is responsible for responding to worker dislocations. This unit is responsible for Rapid Response, WIA dislocated worker, and TAA programs. Having a single agency to administer and deliver services for eligible workers provides a consistent approach to the needs of dislocated workers throughout the state. Rapid response meetings will be held in a timely fashion as they are with all dislocations.

Notices of layoff submitted to the unit will be evaluated for possible Trade Act certification. The unit will assist the company or workers in submitting petitions for TAA. The state will coordinate all available resources, including TAA and WIA, in providing reemployment services. Workers will be co-enrolled when appropriate and feasible by local office staff.