

**WORKFORCE INVESTMENT FIELD INSTRUCTION (WIFI) No. 03-09, Change 3**

**DATE:** December 9, 2011

**TO:** Workforce Investment Area Directors  
Labor Exchange Administrators  
Trade Act State Merit Staff

**SUBJECT:** Clarification for the Use of Pell Grant Funds under the Trade Adjustment Assistance (TAA) Program of the Trade Adjustment Reform Act of 2009

**REFERENCES:** The Trade Act of 1974, as amended; Trade Adjustment Assistance Reform Act of 2002; Amendments to the Trade Act of 1974 Enacted by the Trade and Globalization Adjustment Assistance Reform Act of 2009, Training and Employment Guidance Letter (TEGL) No. 22-08 Section D.5.2; WIFI No. 03-09, WIFI No. 03-09 Change 1 and 2

**BACKGROUND  
INFORMATION:**

President Obama signed the Trade and Globalization Adjustment Assistance Act of 2009 on February 17, 2009. This law is part of the American Recovery and Reinvestment Act of 2009. The Trade and Globalization Adjustment Assistance Act of 2009 changed the Trade Adjustment Assistance for Workers Program.

The administration of the Trade Act Program has changed. TEGL No. 22-08 Section D5.2 provides clarification to the Cooperating State Agency (CSA), stipulating that Pell Grants and other Supplemental Educational Opportunity Grants shall not be taken into account when determining the need or eligibility of a Trade affected worker's training costs. As a result, a CSA may not consider the Student Financial Assistance in determining whether to approve training, allowing a worker to utilize these limited funds for living and other expenses while in training.

**ACTION TO  
BE TAKEN:**

A Trade affected worker's Pell Grant should not be taken into account in determining the need or eligibility for training.

The TAA Individual Training Contract (ITC) form (Revised 9/21/11) attached to this WIFI should replace the TAA ITC form that was revised on 6/21/11. This form is used by the State Merit Case Manager to enroll a Trade affected worker into training.

The new Seven Criteria TAA Training Approval Form (TAA-7C Rev.9/11) will replace the Six Criteria TAA Training Approval Form (TAA-6C, Rev.8/10). The Seven Criteria TAA Training Approval Form (TAA-7C Rev.9/11) is provided as an attachment to this WIFI. Other attachments to this WIFI are as follows: Training General Agreement without Pell, ITC-Vendor Letter, and the Participant Case File Checklist.

The Pell Grant or other Federal Financial Assistance Declaration forms will no longer be required when submitting a training contract.

**CONTACT  
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**EFFECTIVE:** Immediately



Paulette Francois  
Assistant Secretary  
Division of Workforce Development and Adult Learning (DWDAL)

*Attachments:*

*TAA- Individual Training Contract (ITC) form (Revised 9/21/11)*  
*TAA -Training General Agreement without Pell (Revised 9/21/11)*  
*TAA -ITC-Vendor Letter (Revised 9/21/11)*  
*TAA- Participant Case File Checklist (Revised 9/21/11)*  
*TAA-Seven Criteria Training Approval Form (Revised 9/21/11)*