

- Mandatory
- Informational
- Best Practice
- Other



## TECHNICAL ASSISTANCE

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**Contact:** [TAATrainingPlans@dwd.in.gov](mailto:TAATrainingPlans@dwd.in.gov)

**Department/Document Number:** Department of Workforce Development, TAA Unit/TA 20.02

**Topic:** Commuting Area and Transportation/Subsistence Calculations for TAA Training Benefit

**Purpose:** The purpose of this communication is to provide formal guidance on the allowable commuting area for TAA training-related transportation and subsistence. This guidance establishes a process for the calculation of allowable transportation (mileage) and subsistence (lodging/per diem) expenses. The reduction in the commuting area definition below enables a higher level of funding to be provided to TAA participants eligible for training.

### Content

#### Background

New TAA Regulations (20CFR618) become effective September 21, 2020, which allow individuals who are seeking TAA training through a provider that is outside of their commuting area to receive transportation or subsistence allowances as part of the approved training costs.

#### Commuting Area Definition

Effective September 21, 2020, the commuting area, for purposes of TAA training transportation, is five (5) miles one way from the participant's primary place of residence to the training facility. The TAA Unit will use the shortest distance from the participant's primary residence to the training provider location, as established by Google Maps, to determine the commuting distance unless the TAA case manager or participant can provide additional justification as to how/why the shortest distance is not the "usual route" or is otherwise considered unreasonable. The commuting area must be "reasonable" and not be unduly out of the way.

#### Allowable Miles

If an individual qualifies for transportation (mileage), the participant may only be paid for miles that occur over the state commuting area. Each one-way daily commute will be reduced by the state commuting area, 5 miles, in order to determine the reimbursable mileage that exceeds the state commuting area. Therefore, each daily roundtrip commute will be reduced by 10 miles (5 miles for the trip there and 5 miles for the returning trip) to accommodate the new requirement.

*Example: A training participant is travelling 25 miles to school and 25 miles on the return trip home daily. The payable mileage for this example would be a total of 40 miles (20 miles to school and 20 miles on the return trip) since the entire distance within the commuting area cannot be reimbursed.*

## Application

For consideration of eligibility, TAA training plans must include transportation and/or subsistence costs if the individual is travelling outside of his/her commuting area to attend TAA-approved training. Participants requesting transportation and/or subsistence as part of their TAA training must complete a *TAA Transportation and Subsistence Allowance Application* located at <https://www.in.gov/dwd/workonestaff/site/2612.htm>. The *TAA Transportation and Subsistence Allowance Application* must be submitted, in conjunction with the TAA Training Plan Application, to the TAA Unit for formal determination.

## Daily Commuters




Daily commuters are defined as individuals who are not lodging at a secondary location as part of their training. These individuals travel from their primary residence every day to attend their TAA-approved training.

According to 20CFR618.640(d)(2), “the daily transportation payment may not exceed the amount of a daily subsistence payment that would be payable if the participant resided temporarily in the area of training.” This means that for each week of travel, the participant may only be paid the lesser of the meals and incidentals under subsistence (per diem) or the transportation (mileage) as calculated using the GSA website and as outlined below.

Subsistence payments are calculated using 50% of the prevailing meals and incidentals (per diem) rates for the zip code/city in which the training is located, as established by the U.S. General Services Administration (GSA) at [www.gsa.gov/perdiem](http://www.gsa.gov/perdiem).

*Example: Customer A is travelling 84 miles roundtrip to training 5 days/week in Indianapolis, IN for a total of 20 weeks of training.*

*Subsistence for Indianapolis (zip code 46208):*

Primary Destination 	County 	M&IE Total	Continental Breakfast/Breakfast	Lunch	Dinner	Incidental Expenses	First & Last Day of Travel 
Indianapolis / Carmel	Marion / Hamilton	\$56	\$13	\$15	\$23	\$5	\$42.00

Using the above information obtained from the GSA website, the subsistence calculation would be the following:

$$\mathbf{\$56.00 \text{ (per diem)} \times 5 \text{ (days)} \times 20 \text{ (weeks)} \times 50\% = \$9,200.00}$$

Transportation (mileage) payments are calculated using the federal mileage rate established yearly by the U.S. General Services Administration (GSA) at [www.gsa.gov/mileage](http://www.gsa.gov/mileage).

Modes of Transportation	Effective/Applicability Date	Rate per mile
Airplane*	January 1, 2020	\$1.27
If use of privately owned automobile is authorized or if no Government-furnished automobile is available	January 1, 2020	\$0.575
If Government-furnished automobile is available	January 1, 2020	\$0.17
Motorcycle	January 1, 2020	\$0.545

Continuing with the above example: *Customer A is travelling 84 miles roundtrip to training 5 days/week in Indianapolis, IN for a total of 20 weeks of training. Customer A would have their roundtrip total (84 miles) reduced by the distance within the commuting area (5 miles for the trip to training and 5 miles for the trip home from training, for a total of 10 miles).*

If Customer A is using their privately owned vehicle, the following calculation would be used:

$$84 \text{ miles round trip} - 10 \text{ miles (roundtrip miles within the commuting area)} = 74 \text{ miles/day}$$

$$74 \text{ (miles)} \times 5 \text{ days/week} \times 20 \text{ weeks} \times .575 \text{ (federal mileage rate)} = \$4,255.00.$$

For the example of Customer A, they would receive the transportation allowance of \$4,255.00 because it is the lesser of the two calculations.

### **Training including Lodging and Subsistence**

If a participant's training requires them to maintain a temporary residence outside of their commuting area in order to attend TAA-approved training, separate maintenance to maintain temporary living quarters must be made available for these reasonable costs. Separate maintenance includes lodging; meals for yourself (breakfast, lunch and dinner, including taxes and tips); and related incidental expenses such as fees and tips for baggage carriers, hotel staff, etc.

### **Allowable Expenses**

#### ***Lodging***

A temporary residence is defined as lodging at a hotel, school provided dormitory, or other accommodations that are not paid for by another source.

#### ***Subsistence***

In addition to lodging, individuals who will be residing in a temporary residence during training may be eligible for meals and incidental expenses.

Meals include breakfast, lunch, and dinner. Incidentals are defined as items such as fees and tips for baggage carriers, hotel staff, etc.

Allowable expenses for training participants who are residing at a temporary residence may include:

- **Lodging and Per Diem.** The participant's allowable lodging and meals costs cannot exceed the lesser of:
  - The actual costs for lodging and meals while engaged in TAA-approved training, or
  - 50 percent of the prevailing per diem rate for the zip code/city for which the training occurs as established by the U.S. General Services Administration (GSA) at [www.gsa.gov/perdiem](http://www.gsa.gov/perdiem).

Participants are required to supply copies of all lodging and meal receipts for each week of training attendance. If lodging is provided as part of the training, the participant is only required to supply meal receipts.

If a participant chooses to purchase groceries for a week of attendance, the participant must supply the full receipt and an itemized listing so that the actual cost of allowable items can be calculated for the week of attendance. Any item that is not considered a "meal" or "incidental" item as defined above will not be included in the calculation for consideration of reimbursement for subsistence.

*Example: Customer B is lodging in South Bend, Indiana while attending CDL training at Truck Drivers Institute (TDI). Customer will be staying 7 days/week.*

*First, we calculate the GSA rate for the maximum allowable subsistence:*

**Subsistence and Lodging Calculation for South Bend, Indiana.**

Primary Destination	County	2019 Oct	Nov	Dec	2020 Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Standard Rate	Applies for all locations without specified rates	\$96	\$96	\$96	\$96	\$96	\$96	\$96	\$96	\$96	\$96	\$96	\$96

Primary Destination	County	M&IE Total	Continental Breakfast/Breakfast	Lunch	Dinner	Incidental Expenses	First & Last Day of Travel
Standard Rate	Applies for all locations without specified rates	\$55	\$13	\$14	\$23	\$5	\$41.25

*Using the above information obtained from the GSA website, the lodging and subsistence calculation would be the following:*

$$\mathbf{\$96.00 \text{ (lodging)} + \$55.00 \text{ (per diem)} \times 7 \text{ (days of lodging)} \times 50\% \text{ prevailing rate} = \$528.50}$$

*Customer B supplies lodging and meal receipts for the following:*

	Sunday August 23	Monday August 24	Tuesday August 25	Wednesday August 26	Thursday August 27	Friday August 28	Saturday August 29
Breakfast	\$6.50	\$5.00	\$10.00	\$3.25	\$4.89	\$8.00	\$10.00
Lunch	\$13.25	\$11.74	\$12.00	\$6.21	\$8.25	\$13.25	\$8.00
Dinner	\$14.89	\$12.74	\$16.25	\$18.95	\$11.00	\$14.50	\$22.20
LODGING	\$62.50	\$62.50	\$62.50	\$62.50	\$62.50	\$62.50	\$62.50
<b>Total</b>	<b>\$97.14</b>	<b>\$91.98</b>	<b>\$100.75</b>	<b>\$90.91</b>	<b>\$86.64</b>	<b>\$98.25</b>	<b>\$102.70</b>

$$\text{\$97.14} + \text{\$91.98} + \text{100.75} + \text{\$90.91} + \text{\$86.64} + \text{\$98.25} + \text{\$102.70} = \text{\$668.37}$$

*In this example, since the customer's actual costs are higher than the GSA calculated rate of \$528.50/week, the customer will be reimbursed for \$528.50 for the week within the above attendance period for a total of \$528.50.*

Training participants who are residing at a temporary location for training, may also receive transportation (mileage). However, the mileage cannot occur on the same day as a subsistence reimbursement. Participants may receive transportation (mileage) at the beginning of the training and at the end of the training to travel back to the participant's primary residence.

*Example: Customer travels for training on Sunday, August 30; lodges for training Monday, August 31 through Saturday, September 4; and then travels home on Sunday, September 5.*

### **Exclusions**

Transportation (mileage) and Subsistence (lodging/per diem) are only payable for days that the participant physically attends training. If a participant temporarily resides at the training facility, as part of the approved training plan, the participant will receive lodging and subsistence payments for all days that the participant maintains the temporary residence, including weekends. Unexcused absences, holidays, and breaks in training may not be included in the daily transportation or subsistence calculations.

### **Payment Requests (Training)**

Case Managers are required to verify the number of trips/week and location of the training on the customer *TAA Attendance Verification* form. If the participant travels to multiple locations, the number of trips must be verified for each location. The TAA Unit will then calculate the subsistence/transportation allowance for the attendance period and submit payment to the customer. All payments will be paid 35 days in arrears. Case Managers are still required to submit the *TAA Attendance Verification* form to the TAA Unit no more than 5 days after the completion of the training dates within the attendance verification period.

The *TAA Attendance Verification* submitted for transportation/subsistence must include:

- A complete Attendance Verification form with verified number of trips and the training location
- Copies of all lodging and meal receipts (if receiving subsistence)
- Copy of Google Maps from the participant's residence to the location of the training
- IRS W-9 form
- Direct Deposit form

The TAA Attendance Verification form can be found on the WorkOne Staff Portal at:

<https://www.in.gov/dwd/workonestaff/site/2612.htm>.

**Effective Date:** September 21, 2020. This guidance formally rescinds previous guidance released in Technical Guidance DWU 2016-01.

Please direct all questions and clarification to the [TAATrainingPlans@dwd.in.gov](mailto:TAATrainingPlans@dwd.in.gov) inbox.