## EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210

CLASSIFICATION
INA PY 2025 Funding Allocations
CORRESPONDENCE SYMBOL
OWI-DINAP
DATE
May 22, 2025

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 12-24

**TO:** ALL WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

SECTION 166 INDIAN AND NATIVE AMERICAN (INA) GRANTEES

**FROM:** LORI FRAZIER BEARDEN /s/

**Acting Assistant Secretary** 

**SUBJECT:** Program Year 2025 Funding Allotments and Application Instructions for the

WIOA Section 166 Indian and Native American Programs Grantees

- 1. <u>Purpose</u>. To provide WIOA Section 166 Indian and Native American (INA) Program grantees with Comprehensive Services Program (CSP) and Supplemental Youth Services Program (SYSP) funding allotments for Program Year (PY) 2025.
- 2. Action Requested. Grantees must follow the requirements in this guidance to receive PY 2025 funding. Applications and all documents must be submitted through the Grants.gov website <a href="https://www.grants.gov/">https://www.grants.gov/</a> within 30 days from the issue date of this Training and Employment Guidance Letter (TEGL). We will not accept applications through the mail, email, or fax. For Federally recognized tribes that participate in Public Law 102-477, the Employment and Training Administration (ETA) will transfer PY 2025 WIOA Section 166 INA Program funds to the Department of the Interior (DOI), Bureau of Indian Affairs, Office of Indian Services, Division of Workforce Development. These tribes are not required to submit the documents requested in this TEGL but should instead follow DOI's requirements for receiving funds.

## 3. Summary and Background.

- **a.** Summary ETA is issuing this TEGL to:
  - 1) Notify WIOA INA Program grantees of PY 2025 grant allocation amounts;
  - 2) Provide submission requirements to receive grant funding; and
  - 3) Describe the process for requesting an increase in the administrative cost limit.
- **b.** Background On March 15, 2025, the Full-Year Continuing Appropriations and Extensions Act, 2025, was signed into law, authorizing continued FY 2025 appropriations for federal agencies and extending various expiring programs and authorities. The Act provides \$60 million for the WIOA section 166 INA CSP program. Of this amount, \$600,000 will be set-aside for compliance training pursuant to 20 CFR 684.270(e). Therefore, the total amount available for the INA CSP is **\$59,400,000**. This amount will be allocated to INA Program grantees using the formula at 20 CFR 684.270(b).

RESCISSIONS	EXPIRATION DATE
None	Continuing

The Act also provides \$948,130,000 for PY 2025 WIOA Youth Activities. After reducing the appropriation by \$10,230,000 for set asides authorized by the Act and reserving \$925,200 for Migrant and Seasonal Farmworker (MSFW) Youth, \$936,974,800 is available for WIOA Youth activities. Of this amount, 1.5 percent is reserved for the WIOA Section 166 INA SYSP. Accordingly, \$14,054,622 is available for PY 2025 SYSP and will be allotted to INA Program grantees to provide supplemental services to low-income Native American youth on or near Indian reservations and in Oklahoma, Alaska, and Hawaii. ETA will allocate SYSP funds to WIOA INA Program grantees using the formula described in the WIOA regulations at 20 CFR 684.440.

## 4. Details.

a. Use of Updated U.S. Census Bureau Data in PY 2024 Funding Allotments and Hold-Harmless – As required by WIOA, ETA is using the most recent U.S. Census Bureau data available for the WIOA Section 166 INA Program allotment formula. The updated WIOA Service Delivery Area data along with CSP and SYSP Census numbers can be found at: dol.gov/agencies/eta/dinap/census.

To minimize program disruptions, and pursuant to WIOA 20 CFR 684.270(c), ETA continues to implement a three-year phase-in or "hold-harmless" methodology to adjust funding allotments resulting from use of the updated population data in the funding formula. The phase-in of updated Census data will prevent drastic losses in grantee funding amounts by limiting grantee losses to five percent in PY 2024, 10 percent in PY 2025 and 20 percent in PY 2026 compared to the grantee's PY 2023 funding level. Accordingly, for PY 2025, ETA will limit grantee funding losses to 10 percent of the grantee's PY 2023 funding amount after adjusting for the change in the PY 2025 funding appropriation amount.

- **b. Submission Requirements** ETA encourages application submission as soon as possible and within 30 days from the issue date of this TEGL. Applicants must submit a separate application package when requesting CSP Adult funding and SYSP Youth funding. Grantees must submit the following forms through Grants.gov for each application type:
  - i. <u>SF-424</u>, <u>Application for Federal Assistance</u>. An electronically submitted SF-424 through Grants.gov constitutes an official signed document. The SF-424 must identify the legal name of the grantee organization, along with the organization's address, its Unique Entity Identification number (UEI) and its Employer Identification Number (EIN), all of which must match the same information listed in the organization's current registration with the System for Award Management (SAM), found at <a href="https://www.sam.gov/">https://www.sam.gov/</a>. Item #11 of the SF-424 must include the Assistance Listing #17.265 for Native American Employment and Training. Please review the SF-424 instructions document included on Grants.gov to ensure the correct completion of the SF-424. The total funding amount entered under the Estimated Funding section (item #18) must match the allotment amount referenced in Attachment I.
  - ii. <u>SF-424A</u>, <u>Budget Information Non-Construction Programs Form</u>. Please review the SF-424A instructions document included on Grants.gov to ensure the correct completion of the SF-424A. The total funding amount entered must match the allotment amount. See Attachment I for allotment amounts.

- iii. <u>Budget Narrative</u>. The Budget Narrative must follow the detailed instructions provided in Attachment II. Each line item/category amount on the Budget Narrative must also match the line item/category amount totals listed on the SF-424A.
- iv. Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan. Grantees that use a NICRA or Cost Allocation Plan (CAP) must submit a current copy of the NICRA or CAP as part of this application. If a new NICRA has been requested but not finalized, the grantee must include a copy of the request. Please include the letter showing the date it was submitted. Note: If a grantee includes indirect charges on line 6.j of the SF-424A, the grantee must submit a NICRA or CAP unless the grantee elects to charge a de minimis rate. If a grantee elects not to charge indirect costs, there is no need to include a NICRA or CAP.
- c. Request for an Administrative Cost Rate Above 15 Percent Administrative costs are defined in the WIOA regulations at 20 CFR 683.205(b) and 20 CFR 683.215. The grant terms and conditions limit administrative costs for INA grants to 15 percent. However, ETA will approve administrative cost rates of more than 15 percent, but not greater than 20 percent, when the grantee submits acceptable justification. To request an increase to the Administrative Cost Rate, grantees must include within their Budget Narrative a narrative section that clearly makes the request and includes a description of the conditions that exist within its organizations that require an administrative cost rate above 15 percent. Such conditions may include:
  - i. The amount and nature of on-going direct and indirect administrative costs.
  - ii. Local economic conditions such as the cost to rent space, paying salaries that are competitive with other employers in the local area to attract qualified and experienced employees, providing salary increases and other pay incentives to retain good employees.
  - iii. The amount and nature of any uncontrollable increases in the grantee's current administrative costs that are unusual one-time expenses, including significant increases to basic administrative cost components such as rent or staff salaries. (Supporting documentation is required.)
  - iv. How the grantee already supplements the funds it receives from ETA for administrative expenditures with funds from other sources in order to meet its necessary administrative costs.
- **d.** Grants.gov Submission Process To submit the application package through Grants.gov, an individual with the grantee organization must be registered as an Authorized Organization Representative with Grants.gov. Follow the steps below to submit the required documents for PY 2025 funding through Grants.gov.
  - Step 1: Go to Grants.gov.
  - Step 2: Click on LOGIN in the upper right-hand corner of the screen and log in with your username and password.
  - Step 3: Once you are logged into <u>Grants.gov</u>, select the APPLICANTS tab on the Grants.gov homepage and then select Apply Now from the pull-down menu.

- Step 4: In the Funding Opportunity Number field, enter "ETA-INAP-TEGL-12-24-IA" to submit the CSP adult application and enter "ETA-INAP-TEGL-12-24-IY" to submit the SYSP youth application. After entering the Funding Opportunity Number, go down to the Application Filing Name field and enter an application filing name and click on Create Workspace. **Note:** The Applicant Filing Name can be any name you wish to use, however, ETA recommends that the file name identifies the application as a CSP adult grant or a SYSP youth grant. For example, if you are submitting the application for the CSP adult funding, you may want to name it something like "ABC\_Tribe\_PY25\_CSP\_Adult" and if it is an application for the SYSP youth funding, you may want to name it something like "ABC\_Tribe\_PY25\_SYSP\_Youth".
- Step 5: Click on the links in the Application Package Forms and complete all required forms.
- **5. Inquiries.** Please direct questions to your Federal Project Officer.

## 6. References.

- Full-Year Continuing Appropriations and Extensions Act, 2025 (Public Law 119-4, March 15, 2025) available at: <a href="https://www.congress.gov/bill/119th-congress/house-bill/1968">https://www.congress.gov/bill/119th-congress/house-bill/1968</a>
- Section 166 of the WIOA (29 U.S.C. 3221): <a href="https://www.govinfo.gov/content/pkg/USCODE-2022-title29/html/USCODE-2022-title29-chap32-subchapI-partD-sec3221.htm">https://www.govinfo.gov/content/pkg/USCODE-2022-title29/html/USCODE-2022-title29-chap32-subchapI-partD-sec3221.htm</a>
- WIOA; Department of Labor Only, Final Rule at 20 C.F.R. Part 684: https://www.ecfr.gov/current/title-20/chapter-V/part-684
- TEGL 05–24, October 8, 2024, Implementation of the 2024 Revisions to the Office of Management and Budget (OMB) *Guidance for Federal Financial Assistance* available at: TEGL 05-24 | U.S. Department of Labor
- **7.** Attachment I: PY 2025 INA Program Adult and Youth Funding Allocations Attachment II: Funding Restrictions and Budget Narrative Instructions