

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION PY 2019 Funding Allocations
	CORRESPONDENCE SYMBOL OWI DINAP
	DATE May 24, 2019

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 20-18

TO: ALL SECTION 166 INDIAN AND NATIVE AMERICAN (INA) GRANTEES

FROM: MOLLY E. CONWAY /s/
Acting Assistant Secretary

SUBJECT: Program Year (PY) 2019 Funding Allotments and Instructions for the INA Section 166 Programs

1. **Purpose.** To provide INA grantees with Comprehensive Services Program (CSP) and Supplemental Youth Services Program (SYSP) funding allotments for PY 2019 for the Workforce Innovation and Opportunity Act (WIOA), Section 166 programs, and to notify grantees of the required submission of Standard Form (SF) 424 – Application for Federal Assistance, SF 424A – Budget Information (Non-Construction Programs), and Budget Narrative. This Training and Employment Guidance Letter (TEGL) also provides guidance on high carry-in of funding at the end of PY 2018.
2. **Action Requested.** Grantees must follow the requirements in this guidance to receive PY 2019 funding. **Note:** Federally recognized tribes that participate in Public Law 102-477 will have their PY 2019 WIOA funds transferred to the Department of 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.**

Summary. This document provides grantees with guidance and information including:

- INA grantee funding amounts for PY 2019;
- How to submit an application through grants.gov for PY 2019 funding;
- Funding reductions for grantees with excessive amounts of unspent funds at the end of PY 2018; and
- Process for requesting an increase in the administrative cost limit.

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Background. On September 28, 2018, the Department of Defense and Labor, Health and Human Services, and Education Appropriations Act, 2019 and Continuing Appropriations Act, 2019, Pub. L. 115-245 (hereinafter, referred to as “the Act”) was signed into law. The Act provides \$54,500,000 for Native American programs under section 166 of the WIOA. Of this amount, one percent (\$545,000) will be set-aside for technical assistance pursuant to the WIOA Final Rule, 20 CFR 684.270(e) and \$530,000 will be set-aside to award grants to unique populations in Alaska and Hawaii pursuant to WIOA, Section 166(k). Therefore, the total amount available for the Native American Comprehensive Services program is \$53,425,000. This amount will be allocated to INA grantees using the formula in the WIOA Final Rule at 20 CFR 684.270(b).

The Act also provides \$903,416,000 for grants to States for WIOA youth activities and pursuant to Section 127(b)(1)(A) of WIOA, 1½ percent of this amount is to be used to provide youth workforce investment activities for Native American youth in accordance with Section 166(d)(2)(A)(ii) of WIOA. Accordingly, \$13,511,865¹ is available for PY 2019 and will be allotted to INA 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 funds to INA grantees using the formula in the WIOA regulations at 20 CFR 684.440.

4. **Grantee Expenditure Rates for PY 2018.** Grantees that had unobligated funds in excess of 20 percent of total funds available at the end of PY 2018 may be subject to funding adjustments in their PY 2019 award pursuant to 20 CFR 684.270(d).
5. **Submission Requirements.** Grantees will use the funding allotment amounts in Attachment I of this TEGL to submit a SF 424, 424A, Budget Narrative, and a negotiated indirect cost rate agreement (NICRA) or cost allocation plan (if applicable). Grantees receiving both CSP and SYSP funds must submit a separate set of documents for each set of funds, with the exception of indirect cost rate agreements/cost allocation plans. In addition, grantees that would like to request an administrative cost limit above 15 percent but not more than 20 percent should submit such request with the application. See item 5 below for additional information on submitting a request for an increase in the administrative cost limit. Grantees that have made significant program design changes or significant changes in WIOA program activities should also submit a revised four-year strategic plan.

As in past years, grantees will submit documents through the grants.gov website located at www.grants.gov. **Grantees must submit the SF 424, 424A, and Budget Narrative (and NICRA/Cost Allocation Plan if applicable) within 30 days from the issue date of this TEGL.**

6. **Request for an Administrative Cost Rate Above 15 Percent.** The grant Terms and Conditions limit administrative costs for INA grants to 15 percent. However, ETA will approve administrative cost rates in excess of 15 percent, but no more than 20 percent, when the grantee submits acceptable justification. Grantee must describe the conditions that exist within its organizations that require an administrative cost rate above 15 percent. Examples of the conditions that ETA will consider are:

¹ \$2,625,000 of the State youth WIOA appropriation is reserved for set-asides authorized by the Act, therefore, the INA youth program will receive 1 ½ percent of \$900,791,000.

- The amount and nature of on-going direct and indirect administrative costs.
- Local economic conditions such as the cost to rent space, paying salaries that are competitive with other employers in the local area in order to attract qualified and experienced employees, providing salary increases and other pay incentives to retain good employees.
- The amount and nature of any uncontrollable increases in its existing essential 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.)
- 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.
- Significant State-wide activities, for instance extensive geographic area actively serviced under the grant necessitates substantial transportation, or costs associated with providing access to services in an American Job Center, or membership on the State Workforce Development Board are all recognized state-wide activities.

Administrative costs are defined in the WIOA Final Rule at 20 CFR 683.215.

7. **Grants.gov Submission Process.** Grantees must submit the documents described in items 4 and 5 above through Grants.gov. In order to submit documents through grants.gov, you, or someone in your organization, must be registered as an Authorized Organization Representative (AOR) with grants.gov. You can request that the AOR for your organization submit the required documents on your behalf or you may register as an AOR and submit the documents. To learn how to register with grants.gov and become an AOR for your organization go to: <https://www.grants.gov/web/grants/applicants/registration.html> or call the grants.gov help line at: 1-800-518-4726

Follow the steps below to submit the required documents for PY 2019 funding through grants.gov.

Step 1: Go to www.grants.gov

Step 2: Click on *LOGIN* in the upper right hand corner of the screen and log into grants.gov with your user name and password. **Note:** you must register with grants.gov in order to get a user name and password and you must be assigned the Authorized Organization Representative (AOR) by your organization's BIZ Point of Contact (POC). See <https://www.grants.gov/web/grants/applicants/registration/authorize-roles.html> for additional information on how to become an AOR.

Step 3: Once you are logged into grants.gov, 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 ***PY19-NA-Sec166-Funding*** in the Funding Opportunity Number field. Skip the *Opportunity Package ID* and go down to the *Application Filing Name* field and enter an application filing name and then click on *Create Workspace*. **Note:** the Applicant Filing Name can be any name you wish to use and it will become the name for your Workspace. If you receive both CSP and SYSP funds, create a separate workspace in order to submit two separate

applications. For example, you may want to name the Workspace for your CSP application “PY 2019 WIOA Adult Application” and the Workspace for your SYSP application “PY 2019 WIOA Youth Application”.

Step 5: Click on the links in the *Application Package Forms* and complete all the required forms.

Submitting the SF-424 through Grants.gov constitutes an electronically signed SF-424, Application for Federal Assistance. Item #18 on the SF-424 and the amounts in the SF-424A and Budget Narrative must reflect the exact amount of the allotment in Attachment I. Additionally, Item #11 of the SF-424 must include Catalog of Federal Domestic Assistance Number (CFDA) # 17.265.

This submission process can be time-consuming and therefore ETA strongly encourages grantees to initiate the process as soon as possible, in order to allow time to resolve unanticipated technical problems.

Submission requirements stipulate that all applicants for Federal grant and funding opportunities must have a Data Universal Numbering System (D-U-N-S®) number, and must supply their D-U-N-S® number on the SF-424. We strongly encourage grantees to be consistent in using the same D-U-N-S and Employer Identification Number (EIN) that it used in the previous year’s grant application. If you do not know the D-U-N-S and EIN you used for PY 2018, please contact your Federal Project Officer to get the D-U-N-S and EIN.

Please be aware that you cannot submit an application to grants.gov if your organization does not have an active registration in the System for Award Management (SAM). Grantees can find out if they have an active SAM registration by going to: <https://www.sam.gov/SAM/> and clicking on the Search Records tab. Then enter your organizations D-U-N-S and click on the *SEARCH* button. For assistance with SAM registration, please call the SAM federal help desk at: (866) 606-8220.

8. Inquiries. Please direct questions to the designated Federal Project Officer below.

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9. References.

- Consolidated Department of Defense and Labor, Health and Human Services, and Education Appropriations Act, 2019 and Continuing Appropriations Act, 2019 (Pub. L. 115-245), and accompanying Conference Report, H.R. Rep. No. 115-952;
- Section 166 of the WIOA, located at: <https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf>
- WIOA; Department of Labor Only, Final Rule, located at: <https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15975.pdf>

10. Attachment. Attachment I: PY 2019 INA Adult and Youth Allocations