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

CLASSIFICATION
WIOA

CORRESPONDENCE SYMBOL
OWI

DATE
July 8, 2025

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 08-21,

**CHANGE 2** 

TO: STATE WORKFORCE AGENCIES

STATE WORKFORCE LIAISONS

STATE WORKFORCE DEVELOPMENT BOARDS LOCAL WORKFORCE DEVELOPMENT BOARDS ALL AMERICAN JOB CENTER PROGRAMS

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

**Acting Assistant Secretary** 

**SUBJECT:** Stopping the Use of Federal Funds in Conducting Voter Registration within the

American Job Center Network

1. <u>Purpose</u>. To inform states, local areas, and other recipients of Department of Labor's (DOL) Employment and Training Administration (ETA) funds that ETA Federal financial assistance awards cannot fund or reimburse the costs of voter registration activities conducted within the American Job Center (AJC) network.

2. <u>Action Requested</u>. States, local areas, and other grantees are directed to review their policies, processes, and procedures, including applicable memoranda of understanding and cost sharing agreements, to ensure compliance with this Training and Employment Guidance Letter (TEGL).

## 3. Summary and Background.

- a. **Summary** States, local areas, and other grantees cannot allocate funds for voter registration activity costs to their ETA grants.
- b. **Background** The public workforce system, under the Workforce Innovation and Opportunity Act (WIOA), is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with skilled workers. WIOA funding and other ETA-funded activities should adhere closely to their intended mission and be directly tied to their authorized activities. WIOA funding can be used for a wide variety of activities that support employment and training of American workers or the skilled labor demands of American employers but cannot be used for purposes unrelated to the statute. Utilizing ETA-provided resources for voter registration redirects programs away from their core workforce development mission. To realign AJC programs and reinforce worker-centric priorities, ETA rescinded TEGL No.

RESCISSIONS	EXPIRATION DATE
None	Continuing

- 08-21, *Providing Access to Voting Through the American Job Center Network* on May 2, 2025. This guidance replaces TEGL No. 08-21 and supports AJC compliance with Executive Order 14248, *Preserving and Protecting the Integrity of American Elections*.
- **4.** Voter Registration Activities Are Unallowable Costs under WIOA. The costs of conducting voter registration activities are not allocable to ETA funding. Voter registration activity costs incurred after the issuance of this guidance and identified during ETA's federal management and oversight of grant awards will result in disallowed costs.
  - a. Covered Programs This guidance applies across all ETA-funded programs, unless an exception is provided in applicable federal laws, regulations, or subsequent DOL guidance. Several ETA programs, including the WIOA Title I Youth Program, YouthBuild, Indian and Native American Supplemental Youth Program, National Farmworker Jobs Program, and Reentry Employment Opportunities programs include provisions intended to promote the positive leadership development of youth participants; the WIOA Youth program specifically includes Leadership Development as a required element, which sometimes includes the discussion of voting as a form of community and civic engagement. This guidance does not change the WIOA Youth elements or change any participants' right to vote. However, grantees may not allocate costs for voter registration activities to their ETA grant, as voter registration activities are outside the purposes of ETA's grants.
  - b. Shared Space and Co-located State and Local Services One of the founding principles of the AJC network is co-location of various employment and related services to provide a "one-stop" service model for both workers and employers. In implementing the "one-stop" approach it has become common for various federal, state, and local programs to be co-located within AJCs and for AJC centers, themselves, to be housed within larger government facilities, such as state universities or government centers. Furthermore, some AJC staff members' compensation may be allocated across a combination of federal, state, or local programs. This guidance only applies to the ETA portion of funds in such cost sharing arrangements.
  - c. Conformity with Federal Laws Nothing in this guidance shall be construed to impair or otherwise affect the authority granted by law, including the National Voter Registration Act of 1993, to states or local areas.
- **5. Inquiries.** Please direct inquiries to the appropriate Regional Office.

## 6. References.

- The National Voter Registration Act of 1993, codified as amended at 52 U.S.C. §§ 20501-20511;
- Workforce Innovation and Opportunity Act (WIOA), Pub. L. No. 113-128, 128 STAT. 1425, 1573-1576;
- 20 CFR 681.530, 20 CFR 684.310, 20 CFR 685.370;

- Executive Order 14248, *Preserving and Protecting the Integrity of American Elections*, issued March 24, 2025; and
- TEGL No. 08-21, Change 1, Recission of Training and Employment Guidance Letter (TEGL) No. 08-21, Providing Access to Voting Through the American Job Center Network, issued May 2, 2025.

## 7. Attachment(s). N/A