

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Trade Adjustment Assistance
	CORRESPONDENCE SYMBOL OTAA
	DATE July 22, 2025

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 01-25

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
AFFILIATE AMERICAN JOB CENTER MANAGERS
COMPREHENSIVE AMERICAN JOB CENTER MANAGERS
STATE WORKFORCE ADMINISTRATORS
STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
STATE LABOR COMMISSIONERS
RAPID RESPONSE COORDINATORS
TRADE ADJUSTMENT ASSISTANCE LEADS

FROM: LORI FRAZIER BEARDEN /s/
Acting Assistant Secretary

SUBJECT: Process for Requesting Fiscal Year (FY) 2025 Trade Adjustment Assistance (TAA) Program Training and Other Activities (TaOA) Funds, SF-424 Instructions, and Grants Management Requirements Relating to TAA TaOA Funds. **FY 2025 TaOA Funds are Available by Request Only**

1. **Purpose.** To advise State Workforce Agencies, or agencies designated by Governors as “Cooperating State Agencies” (CSAs) (also jointly referred to as “states”) of the “by request” process and associated deadlines for receiving FY 2025 TAA Program TaOA funds.
2. **Action Requested.** States must implement the guidance provided herein, which outlines the process for requesting and obtaining FY 2025 TAA TaOA funds.
 - a. States must request FY 2025 TaOA funds, if needed, by submitting Form ETA-9117, including the amount of funding requested and a narrative justification for funds **no later than 20 calendar days** from the publication date of this guidance. As a part of the request, states must complete and submit Form SF-424 via www.grants.gov. FY 2025 TaOA funds are limited and will be awarded based on demonstrated need. The Department will analyze each request and approve or deny the state’s request on a case-by-case basis as described in section 4.b. below.

RESCISSIONS None	EXPIRATION DATE Continuing
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3. Summary and Background.

- a. Summary – [Training and Employment Guidance Letter \(TEGL\) No. 24-20](#) and its [Change 1](#)¹ reminds states that as of July 1, 2022, the TAA Program entered phaseout termination. This guidance also informed states that although the termination provision of the Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015) prohibits the Department from certifying petitions for TAA group eligibility on and after July 1, 2022, workers certified as eligible to apply for assistance under a petition certified prior to July 1, 2022, and who were separated on or before June 30, 2022, continue to be entitled to TAA. The TAA program has been in phaseout termination status for four years, and the Department has found that state funding needs now vary significantly from state to state and as compared to pre-termination needs. Based on the changing needs of the TAA Program, the Department determined that the most efficient and effective method to distribute FY 2025 TaOA funds is for states to request funding according to their needs rather than using a predetermined formula to allocate funds.
- b. Background – States should make every effort to prioritize funding for those activities necessary to support winddown/phaseout of the TAA Program. The Department is not rescinding TEGL No. 24-20; however, there is no pending legislation to reauthorize the TAA Program. Importantly, the amount of funding appropriated by Congress for the Trade Program has decreased significantly from prior year appropriations predating phaseout termination, so the Department is managing the allocation of funds accordingly.

4. FY 2025 TaOA Funds.

- a. Limited FY 2025 TaOA Funding – The Trade Act of 1974 (Pub. L. No. 93-618), as amended (the Trade Act) (codified at 19 U.S.C. §§ 2271 et seq.), Title II, Chapter 2, established the TAA, Alternative Trade Adjustment Assistance (ATAA), and Reemployment Trade Adjustment Assistance (RTAA) programs. These programs, collectively referred to as the TAA Program, provide assistance to workers who have been adversely affected by foreign trade. Funding for the TAA Program is provided in the Federal Unemployment Benefits and Allowances (FUBA) section of the annual budget. The Full-Year Continuing Appropriations and Extensions Act, 2025, (Pub. L. 119-4), enacted March 15, 2025, appropriates \$33,900,000 for FUBA in FY 2025. The \$33,900,000 appropriation is subject to sequestration in accordance with the Balanced Budget and Emergency Deficit Control Act of 1985 (BBEDCA), as amended by the Budget Control Act of 2011 (BCA). After applying the sequestration reduction, \$31,967,700 remains available for FY 2025. On April 29, 2025, Office of Management and Budget (OMB) approved the Department’s request to reapportion the FUBA allocations as follows: \$25,867,700 for TaOA; \$6,000,000 for Trade Readjustment Allowance (TRA) benefits; and \$100,000 for A/RTAA. The

¹ TEGL No. 24-20 and its *Change 1 to the Operating Instructions for Implementing the Reversion Provisions of the Amendments to the Trade Act of 1974 Enacted by the Trade Adjustment Assistance Reauthorization Act of 2015*.

Department allocated \$2,600,000 of TaOA funds to Louisiana and Oregon in amounts of \$100,000 and \$2,500,000, respectively, based on these states' urgent requests for funding, leaving \$23,267,700 available for allocation to states. FY 2025 TaOA funds are available to states that apply for funding using the process outlined in this guidance and demonstrate a need for the funds.

- b. Demonstrated Need – The regulations at 20 CFR § 618.920 provide the criteria for a state to demonstrate their need for TaOA² reserve funds. For the purpose of allocating FY 2025 TaOA funds, the Department is adopting these criteria to approve state requests for such funds as follows:
 - i. A State requesting FY 2025 TaOA funds must demonstrate that:
 - At least 50 percent of the total of the State's FY 2024 and FY 2023 TaOA funds have been expended; or
 - The State needs additional TaOA funds to meet demands for services due to unusual and unexpected events, which includes an unexpected increase in the number of trade-affected workers eligible for TaOA.
 - ii. A State requesting FY 2025 funds must provide a documented estimate of funding needs through the end of the fiscal year. That estimate must be based on an analysis that includes, at a minimum, the following:
 - The average cost of training in the State;
 - The expected number of participants in training through the end of the fiscal year; and
 - The remaining TaOA funds the State has available.
- c. Restrict Outreach – States are required to continue to operate their TAA Programs in accordance with the termination provisions and requirements provided in Attachment III; however, the Department is encouraging states to minimize funding for outreach and prioritize serving existing participants. For example, states could limit outreach to TAA-eligible workers who visit American Job Centers (AJCs) or to workers identified through rapid response activities. Outreach activities should be charged to employment and case management services.
- d. State Administration – 20 CFR § 618.860(b) delineates the permissible activities for which TAA Program TaOA administrative funds may be used. State administrative activities include recommending and reviewing the waiver of the training requirement; issuing, approving, continuing, or revoking training waivers; approving or denying training programs and plans; participating as needed in adjudication or appellate activity associated with any TAA benefit or service; and other administrative activities relating to the TAA Program. The amount of TaOA funds is directly related to the number of workers being served. With no new workers being certified under phaseout termination, states are allocating a higher percentage of their TaOA funds for state administration. To address the need for administrative funding,

² TaOA funds cover the costs incurred in providing training, job search allowances, relocation allowances, state administration, and employment and case management services to workers eligible for TAA.

states may request to use more than 10 percent of the FY 2025 TaOA funds requested for state administration. However, such requests must include a justification for exceeding the 10 percent limitation.

- e. Period of Performance – In compliance with the Uniform Guidance at 2 CFR § 200.403(a), the use of TaOA funds must be necessary and reasonable for the performance of the TAA program. FY 2025 TaOA funds are available for expenditure for three fiscal years (FY 2025, FY 2026, and FY 2027).
- f. Process and Deadlines for Requesting FY 2025 TaOA Funds – Each state in need of funds must utilize the reserve funds process provided at 20 CFR § 618.920 to request such funds. States must complete Form ETA-9117 and email their request to otaa.administrator@dol.gov within 20 calendar days from the publication date of this guidance. In addition, states must complete their Standard Form (SF)-424 and submit this form via www.grants.gov no later than 20 calendar-days from the publication date of this guidance. States must enter the amount requested in Item 18 of Form SF-424. Detailed instructions for submitting the SF-424 are provided below in Section 4.i. **Do not submit SF-424 to otaa.administrator@dol.gov.**
- g. Process for Completing the ETA-9117 – Contact the Regional Office for assistance with completing the ETA-9117. Using the information below, collaborate with the region to determine available FY 2023 and FY 2024 funds, i.e. carry-in funding, and list all unobligated funding in sections 1 through 3 of the form. Complete Justification section as follows:
 - i. Determine the amount needed for state administration, training, case management, job search allowances, relocation allowances, Information Technology (IT), and infrastructure costs.
 - *Note: Training cost calculations should be based on the number of participants currently in training and those expected to enter training before the end of FY 2025, multiplied by the cost of training in the state. Historically, the average training cost per TAA participant is approximately \$13,000. States must provide a justification for the amount of funds requested for state administration if this amount exceeds 10% of the total request.*
 - ii. Calculate infrastructure costs, including committed IT costs.
 - iii. Total the required amount, then subtract the unobligated carry-in funds from this total.
 - iv. Check the calculated request amount for reasonableness.
 - v. Enter the amount of the request and other required information on ETA-9117 form. Be sure to include a narrative explaining the current state of funding and the intended use of the requested funds in the justification.
 - vi. Obtain the necessary signatures and email the request along with any supporting documentation to otaa.administrator@dol.gov.
 - vii. At the same time, within 20 calendar days of the publication date of this guidance, states must complete and submit an SF-424 via www.grants.gov by including the amount of the request. See Section 4.i. below, (Grants Management) for additional information on submitting the SF-424 via www.grants.gov.

- h. Use of FY 2025 Funds – States may use TaOA funds to serve members of worker groups covered by a certification under the 2002 Program, the 2009 Program, the 2011 Program, the 2015 Program, and the Reversion 2021 Program in accordance with the requirements in the TAA law in effect at the time of filing of such petition for certification. TaOA funds cover the costs incurred in providing training, job search allowances, relocation allowances, state administration, and employment and case management services to TAA-eligible workers.
- i. Grants Management – States must submit an FY 2025 SF-424 for the amount requested no later than twenty calendar days after publication date of this guidance. States must: 1) enter the announcement number of this TEGL, ETA-TEGL-NO-01-25, into the opportunity number field of the application, and 2) enter the applicable the dollar amount of funds requested for FY 2025 on Line 18 of the SF-424. Attachment IV of this TEGL provides detailed instructions for submitting the SF-424 and includes links to resources, including customer service contacts and other information, available at www.grants.gov. The Department's Office of Grants Management (OGM), in conjunction with the Office of Trade Adjustment Assistance, will review the submitted application materials and request any updates or corrections as needed. Once approved, OGM will incorporate the application with the Grant Agreement (GA), which will be executed by the Department's Grant Officer and transmitted to the Authorized Representative and the Point of Contact identified on the SF-424 for the state. Any subsequent changes to the information submitted on the SF-424 (individuals identified, address, etc.) must be submitted to the Department as a request to modify the GA via the assigned Federal Project Officer. Links to reporting databases, as well as general guidance on how to administer a grant award, may be found at: <https://www.dol.gov/agencies/eta/grants/management>, TAA Community page at <https://taa.workforcegps.org>, our Office of Grants Management Grants Application and Management community page at: <https://grantsapplicationandmanagement.workforcegps.org/resources/2016/12/14/10/45/Grant-Management-Training>, and in the Uniform Guidance at 2 CFR 200 et. seq. at: [eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#).
- i. **Important: Common Errors on SF-424 Submissions.** Given the compressed timeline, to avoid delays in funding, states should direct special attention to the following areas of the SF-424:
- Line Item #15: States must also provide indirect cost information as a sentence in Line Item #15, Descriptive Title of Applicant's Project, on the SF-424 Form. *Example: "Indirect Costs for this award are estimated at \$19,000."* State grantees may use a federally approved Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan (CAP) rate to calculate indirect costs against their full FY 2025 TaOA allotments to estimate this total. States will not need to provide supporting documentation (i.e., Indirect Cost Rate Agreement or Cost Allocation Plan) in their application to substantiate the amount of Indirect Costs estimated in Item #15. The amount a

state enters for Indirect Costs will not impact the total amount entered in Item #18, Estimated Funding (\$) of the SF-424, i.e., states should enter the amount requested on Item 18.

- Line Item 17: The period of performance for these funds will be 10/01/2024 to 09/30/2027. States must enter this information on Line 17 on their SF-424.

5. **Inquiries.** Please direct inquiries to the appropriate Regional Office.

6. **References.**

- Pub. L. 119-4, Full-Year Continuing Appropriations and Extensions Act, 2025;
- Chapter 2 of Title II of the Trade Act of 1974, as amended (Pub. L. 93-618) (Trade Act) (codified at 19 U.S.C. 2271 et seq.);
- Pub. L. 114-27, Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015);
- TAA Final Rule, 20 CFR Part 618, 85 FR 51896 (August 21, 2020);
- Agreement Between the Governor and Secretary of Labor, United States Department of Labor, to carry Out the Provisions of Subchapters A, B, and C of Chapter 2 of Title II of the Trade Act of 1974, as amended by the Trade Adjustment Assistance Reauthorization Act of 2015;
- Joint WIOA Final Rule, as applicable, published in the *Federal Register* at: <https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15977.pdf>;
- Department-Only WIOA Final Rule, as applicable, published in the *Federal Register* at: <https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15975.pdf>;
- [2 CFR part 200](#) (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) and 2 CFR part 2900 (Department's Supplement to 2 CFR part 200);
- Balanced Budget and Emergency Deficit Control Act of 1985 (BBEDCA), as amended by the Budget Control Act of 2011 (BCA);
- [TEGL No. 14-22](#), *Trade Adjustment Assistance (TAA) for Workers Program Phase-out Termination Frequently Asked Questions (FAQs)*, issued April 14, 2023;
- [TEGL No. 24-20](#), *Operating Instructions for Implementing the Reversion Provisions of the Amendments to the Trade Act of 1974 Enacted by the Trade Adjustment Assistance Reauthorization Act of 2015*, issued June 4, 2021;
- [TEGL No. 24-20, Change 1](#), *Change 1 to Operating Instructions for Implementing the Reversion Provisions of the Amendments to the Trade Act of 1974 Enacted by the Trade Adjustment Assistance Reauthorization Act of 2015*, issued November 25, 2022;
- [TEGL No. 17-16](#), *Infrastructure Funding of the One-Stop Delivery System*, issued January 18, 2027; and
- [TEGL No. 03-19](#), *Real Property Under Employment and Training Administration-Funded Grants*, issued July 15, 2019.

7. **Attachment(s).**

- Attachment I – ETA-9117
- Attachment II – Award Description for Trade Adjustment Assistance (TAA) Program Training and Other Activities (TaOA) Grants
- Attachment III – TAA Program Requirements
- Attachment IV – Submission Instructions for (TaOA) Funding via SF-424 and www.grants.gov