

<b>EMPLOYMENT AND TRAINING ADMINISTRATION</b> <b>ADVISORY SYSTEM</b> <b>U.S. DEPARTMENT OF LABOR</b> <b>Washington, D.C. 20210</b>	<b>CLASSIFICATION</b> Financial Reporting
	<b>CORRESPONDENCE SYMBOL</b> OGM
	<b>DATE</b> December 29, 2025

**ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 06-25**

**TO:** STATE WORKFORCE AGENCIES  
STATE WORKFORCE ADMINISTRATORS  
STATE WORKFORCE LIASIONS  
STATE AND LOCAL WORKFORCE INVESTMENT BOARDS  
ALL DIRECT AWARD RECIPIENTS

**FROM:** LORI FRAZIER BEARDEN /s/  
Acting Assistant Secretary

**SUBJECT:** Payment Management System Mandatory Payment Request Justification

1. **Purpose.** To provide Employment and Training Administration (ETA) grant and cooperative agreement recipients (recipients) with information regarding the Payment Management System’s (PMS) mandatory payment request justification, ETA’s review and approval of payment request justifications, as well as to provide examples of acceptable payment request justifications.
2. **Action Requested.** Please disseminate this guidance to all recipient staff responsible for submitting payment requests through PMS.
3. **Summary and Background.**
  - a. Summary – This guidance outlines the requirement in PMS for recipients to complete a mandatory payment request justification field and provides examples of acceptable payment request justifications. It also covers ETA’s review and approval of the payment request justifications.
  - b. Background – The U.S. Department of Labor uses the U.S. Department of Health and Human Services’ (HHS) PMS to disburse funds to its recipients. A recipient submits a payment request to PMS, which is approved or rejected by PMS staff based on the recipient’s payment drawdown history, authorized award amount, and remaining award balances.

As of March 17, 2025, all recipients are now required to submit a justification with each payment request submitted to PMS. HHS has created a new mandatory field on the PMS payment request screen that requires recipients to provide a brief justification for each payment request submitted for approval. This new field is part of the implementation of section 3 of Executive Order (E.O.) 14222, [\*Implementing the President's "Department of\*](#)

<b>RESCISSIONS</b> None	<b>EXPIRATION DATE</b> Continuing
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Government Efficiency" Cost Efficiency Initiative, which requires that each agency “record every payment issued by the agency,” along with “a brief, written justification for each payment submitted by the agency employee who approves the payment.” The recipient justification provided in PMS will help inform ETA’s own justification and approval or denial of the payment.

#### **4. PMS Mandatory Payment Request Justification and ETA Review and Approval.**

##### ***a. PMS Mandatory Payment Request Justification***

On March 17, 2025, HHS introduced a mandatory field in the PMS payment request screen to capture a justification from the recipient explaining the purpose of the payment request.

##### ***i. Payment Request Justification Content and Length***

The payment request justification must be detailed enough to allow ETA to be able to make an approval decision (as discussed further in section 4.b below). At a minimum, the recipient payment request justification must provide:

- The ETA program for which the payment is being requested;
- A list of budget item(s) or expense category(ies), along with an amount for each that sums up to the total payment request; and
- A date range associated with the costs included in the payment request.

If requesting payment for contractual services and operations costs, recipients must provide a breakdown as part of the payment request justification. In preparing their payment request justification, recipients should be mindful that the field to capture the payment request justification in PMS is limited to 1,000 characters. Please see Attachment I for examples of payment request justifications.

##### ***ii. Payment Request Justifications Should Not Contain Personally Identifiable Information (PII)***

Recipients must refrain from including PII or other sensitive information in their PMS payment request justifications. Additional information regarding PII and other sensitive information can be found in Training and Employment Guidance Letter No. 39-11, [Guidance on the Handling and Protection of Personally Identifiable Information \(PII\)](#). ETA staff will ensure that no PII or protected information is included in payment approvals. The Defend the Spend (DTS) system, discussed in more detail below, contains functionality that will allow ETA staff to remove any PII from the recipient payment request. Both the payment request justification provided by the recipient as well as the approval comment provided by ETA staff are posted at [www.doge.gov/payments](http://www.doge.gov/payments).

iii. *Payment Requests Covering Multiple PMS Subaccounts*

If a payment request covers **multiple** PMS subaccounts, a justification is required for **each** of the PMS subaccounts, as shown below.

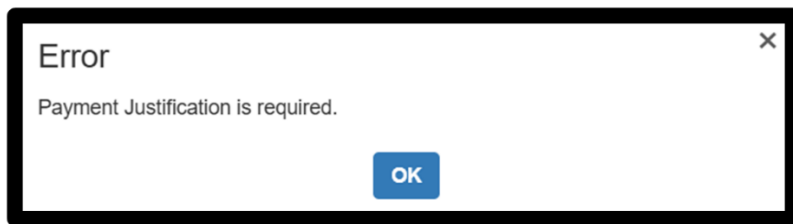
**Payment Request - \$25,000 (two sub-accounts)**

The following list of subaccounts are associated with same account number. Enter the requested amount for each subaccount you want included in the request.

Subaccount Number	Unexpended Funds	Total Available Funds	Subaccount amount requested	Payment Justification
BT12345XX1	\$2,930,178.28	\$2,930,178.28	20,000	These funds reimburse XYZ program expenditures for assisting dislocated workers in finding employment and support on-the-job and incumbent worker training. This covers performance tracking and subrecipient costs for job search (\$5,000), career planning and training (\$15,000) for January 6 through January 31, 2025.
DE56789E41	\$670,142.46	\$670,142.46	5,000	These funds reimburse project expenditures for the period of 12/15/24 to 12/31/24 as outlined in the grant agreement. This request covers reimbursements for project related travel (\$2,650), supplies (\$550), and indirect costs (\$1,800) for the ABC program.
		<b>Total Amount Requested</b>	<b>\$25,000</b>	

If a justification is needed or is insufficient for one subaccount, the entire payment request will be on hold until adequate justification is received for the subaccount in question. Therefore, recipients are strongly encouraged to submit separate payment requests and justifications for each individual PMS subaccount to avoid potential payment delays.

If a recipient leaves the required payment request justification field blank, PMS will not allow the request to move forward, and the following error message will display:



Once the payment request justification is inputted and submitted, the payment request justification is then transferred to the DTS system for ETA staff review.

**b. *ETA Review and Approval – Defend the Spend***

In support of E.O. 14222, the Department of Government Efficiency launched an initiative called DTS that requires each agency to provide written justification and approval for each recipient payment request. The DTS system captures the recipient’s payment request justification (*recipient justification*) submitted in PMS and provides functionality for ETA

staff to: (1) review and approve the recipient's payment request and provide the agency's written justification for approval (*Agency approval justification*), (2) request additional clarification from the recipient for the payment request justification, if needed, or (3) reject the payment request.

The DTS system interface with PMS pulls payment requests every 60 seconds into DTS for review by ETA staff. ETA staff must review and act on payment requests within three business days of receipt.

*i. Payment Request Justification Clarification*

When clarification is required on a payment request justification (e.g., the justification does not contain the minimum required elements, the justification is unclear, etc.), a DTS system generated email notification will be sent to the recipient with specifics on what clarification and updates are needed.

Once the recipient responds to the clarification request via an updated payment request justification, it will re-enter the review and approval cycle. Recipients should respond to requests for clarification on payment request justifications as soon as possible and ensure that all the elements in the clarification request are addressed in the updated payment request justification, as the payment request will be in a hold status until the clarification request is responded to and accepted by ETA.

Recipients should save DTS in their email contacts to ensure DTS emails are not identified as spam and can be acted upon quickly. Recipients should work with their ETA representative if issues arise.

*ii. Payment Requests Covering Multiple PMS Subaccounts*

As noted above, if a payment request covers multiple PMS subaccounts, a justification is required for *each* PMS subaccount. If a recipient submits a payment request with multiple PMS subaccounts and ETA staff request additional clarification for one of the subaccount's justifications, the entire payment request will be in a hold status until the clarification request is completed and accepted by ETA.

Thus, as mentioned above, recipients are strongly encouraged to submit separate payment requests and justifications for each individual PMS subaccount to avoid the potential of payment delays when the justification for one or more of the PMS subaccount(s) is sufficient while clarification is needed on the justification for another of the PMS subaccounts.

iii. *Payment Release*

Once reviewed and approved by ETA staff, the DTS system releases the payment. Typically, DTS has a daily 4:00 pm EST cut-off to send approved requests to the U.S. Department of the Treasury to release payments.

iv. *Payment Request Rejections*

In certain circumstances, it may be necessary for ETA staff to reject a recipient payment request outright (e.g., a recipient submits a duplicate payment request or a request for unallowable costs). When a payment request is rejected, the recipient will receive a DTS system generated email notification of the payment request rejection.

5. **Inquiries.** Please direct any inquiries as follows:

- a. Questions on this Guidance – please contact your assigned Federal Project Officer (FPO) or the appropriate regional or national program office.
- b. PMS Technical Assistance – please contact the PMS Helpdesk at: [PMSSupport@psc.hhs.gov](mailto:PMSSupport@psc.hhs.gov) and copy your assigned FPO. Submit an online ticket at: [https://gditshared.servicenowservices.com/hhs\\_pms](https://gditshared.servicenowservices.com/hhs_pms).

6. **References.**

- Executive Order 14222, *Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative*, <https://www.whitehouse.gov/presidential-actions/2025/02/implementing-the-presidents-department-of-government-efficiency-cost-efficiency-initiative/>; and
- Training and Employment Guidance Letter No. 39-11, *Guidance on the Handling and Protection of Personally Identifiable Information (PII)*, <https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-39-11>.

7. **Attachments.**

Attachment I – Payment Management System Mandatory Payment Request Justification Examples

Attachment II – Frequently Asked Questions