

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION WIOA
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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 11-25

TO: STATE AND LOCAL WORKFORCE AGENCIES
STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
STATE-LEVEL EQUAL OPPORTUNITY OFFICERS
AMERICAN JOB CENTER DIRECTORS
ALL DEPARTMENT OF LABOR COMPETITIVE GRANTEEES
STATE ADULT EDUCATION DIRECTORS
STATE CAREER AND TECHNICAL EDUCATION DIRECTORS

FROM: HENRY MACK, ED.D. /s/
Assistant Secretary

SUBJECT: Clarifying Allowable Outreach Activities for Federal Formula and Competitive Grants

- Purpose.** This guidance: 1) clarifies the allowable uses of formula and competitive grant funds authorized by the Workforce Innovation and Opportunity Act (WIOA), including the Adult Education and Family Literacy Act (AEFLA), and the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) for outreach activities; 2) provides examples of how grantees can use grant funds to effectively conduct outreach; and 3) directs the workforce system to expand its reach to more workers who can benefit from employment and training services and to better meet the needs of businesses.
- Action Requested.** The Employment and Training Administration (ETA) directs that state workforce and education agencies, state and local workforce development boards, and competitive grantees review and assess all existing outreach efforts and revise, or develop and implement, the appropriate policies, procedures, and strategies to guide the allowable use of funds to conduct outreach activities and better meet program goals. It is imperative that all individuals who could benefit from workforce services and career and technical education (CTE) become aware of and know how to access these critical services through the public workforce and education systems funded through WIOA and Perkins V. The goal of strong program outreach is for more Americans to find themselves on a pathway to meaningful work and self-sufficiency.

RESCISSIONS TEGL 03-23	EXPIRATION DATE Continuing
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3. Summary and Background.

- a. Summary – This Training and Employment Guidance Letter (TEGL) rescinds TEGL 03-23 and replaces it with this new guidance in order to provide additional clarity on allowable outreach to participants and align policies with the current Administration. This TEGL directs grantees to expand the reach of workforce development services by providing clarity on how formula and discretionary grant funds can be used to conduct outreach activities.
- b. Background – The public workforce system can play a critical role in connecting talent with opportunity, connecting customers to employment and training opportunities, and helping employers recruit workers that match their skill needs. However, too few Americans are currently benefiting from the federal investments in workforce development through WIOA and Perkins V and the national labor force participation rate is far too low. As discussed in *America’s Talent Strategy: Building the Workforce for the Golden Age*, the public workforce system must work to reconnect millions of Americans with meaningful work, including through outreach to long-term unemployed and underemployed populations, and those who have left the labor force entirely. To better communicate the workforce system’s value and expand awareness of its services to jobseekers and employers, the system must conduct effective outreach.

WIOA requires grantees to inform the public about services, conduct proactive outreach, and make individuals aware of services that can support their employment needs. Similarly, Perkins V requires eligible recipients to describe how they will recruit and serve students, including special populations, and to ensure that learners and families have access to information about available CTE programs and their outcomes. The Uniform Guidance regulates the administrative and financial requirements of federal grant funds, including WIOA and Perkins V formula grants and the Department of Labor’s (DOL) competitive grants; see [2 CFR part 200](#) and DOL’s exceptions at [2 CFR part 2900](#). Specifically, [2 CFR 200.421](#) allows for grantees to recruit program participants and to engage businesses by communicating with them. The American Job Center (AJC) brand was created to increase awareness of the services of the public workforce system and to facilitate outreach.

This TEGL seeks to demonstrate the flexible uses of both formula and competitive grant funds, including both WIOA and Perkins V, to conduct outreach activities and directs workforce and education systems to expand their reach to more individuals who can benefit from education and employment and training services.

4. **Allowable Outreach Activities.** To meet the goals articulated in *America’s Talent Strategy*, ETA and ED encourage their grantees to conduct outreach activities to meet the needs of their customers and to fulfill grant objectives. Outreach activities are allowable using WIOA and Perkins V funds and may also be leveraged through partnerships to ensure potential participants are aware of services available through the workforce system.

Pillar III within *America's Talent Strategy* discusses the importance of integrated systems when it articulates that “a modern workforce system must be unified, navigable, and built around the needs of its users.” To achieve this vision, outreach strategies should also include coordination with critical partner programs, such as Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and other benefit programs, in order to ensure DOL-funded programs are reaching those seeking better employment opportunities and those that must meet work requirements. Outreach can ensure that individuals receiving public benefits with work requirements are able to meet those requirements, can transition off public benefits, and become economically self-sufficient. Coordinated outreach with these one-stop partners can be both beneficial in identifying participants for WIOA programs and in helping one-stop partner programs meet their program goals. Coordinated outreach could include creating outreach materials with information about multiple programs, reviewing data on income or unemployment to identify areas with acute program needs in order to target outreach, and sharing participant data within data sharing and privacy agreements to facilitate informing SNAP or TANF participants about WIOA services.

In addition, grantees should strongly consider coordinating outreach activities with Perkins V local directors and stakeholders and AEFLA providers to increase awareness of the range of services available through Perkins V and WIOA-funded programs. This will ensure there are clear pathways for co-enrollment opportunities between programs, including work-based learning, secondary-to-postsecondary CTE programs of study, Integrated Education and Training for adult learners, and pre-apprenticeship and youth-serving Registered Apprenticeship opportunities.

As a reminder, Sections 124 and 135 of Perkins V may permit outreach and marketing activities so long as those activities also meet the requirements in the Uniform Grant Guidance (2 CFR Part 200) and the Education Department General Regulations (34 CFR Parts 75-99). Marketing and outreach activities via outlets such as newspapers, radio/TV, magazines, and social media directed toward a specific career and technical education program of study or service may be allowable with prior approval from the Office of Career, Technical, and Adult Education.

Grantees should consider creating an outreach plan that details how the purpose of each outreach activity is linked to the program's objectives and indicators and how they would help meet performance outcomes or program objectives while serving a greater number of individuals. Part of a grantee's success and ability to meet expected performance outcomes will depend on how well it communicates and promotes the benefits of the program's services to the communities it plans to serve. Grantees should be cognizant of the medium, timing, and format of outreach activities to ensure individuals have an opportunity to hear or see the message being communicated. In addition to communicating with potential participants, outreach strategies should include efforts to engage businesses. Grantees can engage in a variety of activities to effectively conduct outreach to their customers and educate the public about the services.

This TEGL aims to provide general guidance for both federal formula-funded grantees and competitive grantees on how to assess whether certain outreach activities and uses of funds may be allowable and to highlight the flexibilities and opportunities that exist within current funding. It is important to note that this TEGL does not provide an exhaustive list of allowable activities; rather, it gives examples of some of the more common allowable outreach activities.

As with all Federal award costs, ETA encourages grantees to review the Cost Principles contained in [2 CFR 200.400 – 200.476](#) of the Uniform Guidance. The Cost Principles list the basic criteria that must be met when charging costs to a Federal award—that such costs are necessary, reasonable, and allocable. Additionally, grantees should review other relevant documents, such as state policies and the grant’s Statement of Work for any grant-specific policies that govern outreach activities, including the Public Communications requirement (otherwise known as the Steven’s Amendment) (Pub.L. 119-75). Many grantees are party to Memoranda of Understanding (MOU) that contain the Infrastructure Funding Agreements (IFA) that may also set out goals or limits to the costs that will be shared jointly by partners for outreach activities. WIOA section 121(h)(4) includes outreach costs in its definition of “infrastructure costs.” While WIOA does not set a specific limit on outreach costs, all costs must be reasonable and allocable, as discussed below.

- a. *Defining Advertising and Public Relations:* A common misconception is that Federal workforce development grant funds cannot be spent on program outreach, such as advertising and public relations. These activities are not only allowable but may be necessary to reach both businesses and jobseekers. The key is to make sure that the grantee is promoting *Federally-funded activities, services, and programs* and is not solely promoting the organization’s name recognition or image.

To apply the requirements in the Uniform Guidance, grantees should understand the definitions of “advertising” and “public relations” at [2 CFR 200.421](#). This difference is important as there are separate requirements that govern each type of activity.

Advertising is an allowable cost when completed for outreach for grant activities, services, and programs, as described in [2 CFR 200.421\(b\)](#). Advertising is allowable through various media strategies, such as print, electronic, digital, radio, social media, billboards/signage, text apps, and Quick Response (QR) code. Allowable activities include promoting program services and other specific purposes necessary to meet the requirements of the grant award. The cost of media strategies used to conduct outreach to the public might be personnel or non-personnel costs and promote the activities of the federal award. Grantees should ensure compliance with the regulations at [2 CFR 200.421\(b\)](#), their grant award terms.

Public relations, on the other hand, includes activities that promote Federally-funded activities, services, and programs, and are typically considered personnel costs. Some public relations activities include, but are not limited to, attendance at, facilitation of, collaboration with, or participation in job/career/community fairs, rapid response events, one-stop satellite centers/mobile one-stops, community access points, high

school/college career days, podcasts and other interviews, etc. While advertising of Federally-funded activities, services, and program offerings might be present at a public relations event, public relations differs from advertising in that staff typically interact directly with the community, public, or press during public relations activities. Public relations are an allowable outreach cost for grant activities, services, and programs. This TEGL provides examples of allowable public relations activities as well as general rules of thumb to apply when determining what public relations are allowable or unallowable under federal grants.

Grantees, especially in AJCs, may have MOUs that describe the combined costs for advertising and public relations outreach that encompass the services offered by all its partners. Infrastructure costs might include media platforms (print, electronic, radio, social media, billboards/signage, text apps, QR codes, etc.) describing one-stop partner activities, services, and programs. IFA costs may identify purchases specific to grant outreach activities with potentially additional associated costs for supply purchase customization. ETA broadly interprets grant outreach activities that promote the activities, services, and programs of the grant award to mean efforts to educate, enroll, employ, or extend referrals to customers with interests in ETA's publicly-funded workforce development system efforts. For example, execution of this strategy might include supplies bearing the one-stop delivery identifier, at [20 CFR 678.900](#), as well as a QR code or website that is owned, managed, and updated by the grantee and/or signatories to the MOU and directs the public to more information about the AJC and other workforce programs.

- b. *General rules of thumb:* The Uniform Guidance regulations and this guidance do not list every possible scenario grantees may encounter when planning for outreach activities. The Uniform Guidance generally governs the administrative and financial uses of federal grant funds. Grantees and their fiscal teams should be familiar with those requirements.

The first step in assessing if a cost is allowable for a grant is to determine if the cost is necessary. Some questions to consider are: Is this cost necessary for the performance of the grant? Will this cost assist the organization in achieving its grant's outcomes and goals?

Another step in assessing an allowable cost to a grant is determining cost reasonableness. When testing for reasonableness of a cost, consider the prudent person theory. In the prudent person theory, your organization must consider:

- Would a prudent person use Federal funds to purchase such items?
- Would you have used your own funds to purchase such items?
- Do internal controls (MOU/IFA, policies, sub-recipient agreements, contracts, etc.) exist that designate/describe outreach activities and/or limits?
- Is the ETA grant receiving a benefit and if so, are costs properly allocated based on the relative benefit received?

- If costs are to be shared with other funding streams, are costs being allocated properly?

For example, if your organization distributes commemorative coins that simply list the name of the organization, or just the name of the program with no contact information, and hands them to the organization's board of directors, a prudent person would view these as not advancing awareness of the program's services or employment for participants. These would be considered memorabilia, gifts or souvenirs, and would not be allowable under the Uniform Guidance. On the other hand, if your organization was trying to inform young parents about program services and attended a community event to promote their federally-funded grant program and provided a tote bag with the name of the grant program and contact information as a way for individuals to find out about services funded by the grant, a prudent person would find that cost reasonable. The tote bag, used as an outreach tool, would benefit the program by recruiting potential participants using a very low-cost item that would presumably be re-used and seen by others, and thus help potential participants access those program services. These costs would be reasonably calculated to help increase enrollment as opposed to just commemorating an event or promoting an organization itself and not the grant program and its services.

Records and supporting documentation on the expending of Federal funds on grant activities must be retained to sufficiently support the expenditures reported on the quarterly ETA-9130 form. Documentation must be retained to attest to the allowability, reasonableness, necessity, and allocability of these costs. Supporting documentation may include copies of the advertisement, photos of the outreach activities, applicable contracts, receipts, attendance records, transcripts, and employee travel. Grantees are required to follow record retention and recordkeeping requirements in accordance with 2 CFR 200.334-200.338. Furthermore, grantees are required to retain this supporting documentation, which must be made available to auditors, State and Federal reviewers, and, if applicable, pass-through entities.

c. *Ways to Conduct Outreach:* Once you understand the terms used in the Uniform Guidance, and understand how to determine cost allowability, you can explore the many ways to conduct outreach. Below is a list of several examples of outreach activities and platforms allowed with grant funds.

- *In-Person Outreach:* Attending a local fair with materials about where to go to get help with finding a job, developing a resume, obtaining career advice, and learning interview skills is allowable.

The grantee may need a unique method or strategy for locating, attracting, and retaining potential participants for the specific program. If the grantee does not have enough staff, consider conducting outreach through organizations that are willing and able to spread the grant's key messages to their audience.

Consider meeting potential participants at community locations such as libraries, religious institutions, laundromats, grocery stores, fairs, industry events, and other local events. Reach out to local businesses like barber shops and hair salons, movie theaters, sporting events, and restaurants and ask them to post and share the organization's poster or sign to educate customers about the program or grant-funded services. Consider which organizations are trusted by local communities, and where information can create subsequent "word-of-mouth" information sharing. Local businesses may also allow grantees to join existing events they are planning, or they may permit grantees to use their location as a venue for outreach and enrollment events to promote the grant's opportunities.

In addition to asking community partners and community leaders to spread the word that grantees are providing services, also ensure that they have enough information about the services being provided and where individuals might find value, so that they are able to refer individuals to the organizations that can best help them.

Other in-person activities for outreach include, but are not limited to, attendance at, facilitation of, collaboration with, or participation in job/career fairs, rapid response events, one-stop satellite centers/mobile one-stops, high school/college career days, and other workforce events, etc. Consider setting up a recruitment display table so that information about grant-related services provided by the organization may be distributed. It is appropriate to have advertising materials to promote the program such as brochures, pamphlets, or flash drives at a public relations event. Providing iterative follow-up activities once career fairs, job fairs, and other similar activities have concluded is also helpful.

Materials created to achieve grant objectives/outcomes and for the purpose of outreach at in-person events, and to facilitate engagement between staff and the public are allowable. Materials used to educate the public about the grant-funded activities, services, and program offerings are allowable and encouraged.

- *Mobile AJCs or workforce service delivery vehicles:* To reach people where they live, shop, and gather, particularly in more rural areas, grantees may consider purchasing a vehicle to conduct outreach as well as provide employment and training services. Mobile career centers that are capable of providing program intake, career services and exploration, prescreening, and co-enrollment for partner programs are particularly useful for rural areas. Co-locating AJCs in partner programs' physical plants is also an effective method of outreach that may yield savings on overhead costs for WIOA core and partner programs.

The Uniform Guidance considers motor vehicles as general-purpose equipment, which are allowable under the Cost Principles. Costs to repair and maintain the vehicle are also allowable. The costs of the vehicle and its maintenance must meet all the “factors of allowability” outlined in [2 CFR 200.403](#), and in some circumstances, prior written approval from DOL-ETA may be required. If the motor vehicle benefits two or more programs, the cost of the mobile AJC and the costs to maintain the vehicle must be allocated to the other programs based on the relative benefit received ([2 CFR 200.405\(d\)](#)).

ETA encourages grantees to leverage relationships with other partners that serve the same community or partners and that may have the same purpose or mission when purchasing, staffing, and maintaining a mobile AJC unit.

- *Print:* Printed outreach materials are by far the most popular format for outreach campaigns and are an allowable cost. They can include a variety of items, such as advertising and written articles in the local newspaper or neighborhood newsletter, informational postcards, brochures and flyers, doorknob hangers, pamphlets, and leaflets. Other examples may also include bus stop signage, signage on benches, banners, billboards, vehicle wraps, etc. QR codes may also be used in print media to direct potential participants to online information on the grant funded activities, services, or programs.

ETA broadly interprets printed outreach materials that promote the activities, services, and programs of the grant award to mean efforts to educate, enroll, employ, and/or extend referrals to customers with interests in ETA’s publicly funded workforce development efforts.

- *Radio and TV:* Local radio and TV stations are a great way to advertise grant services and are usually cost effective for media coverage. Grant organizations should research and reach out to members of the media who may cover topics related to its grant award. There may be a specific radio or TV station reporter who covers a particular neighborhood or local community. For media engagement, consider public service announcements (PSAs) and press releases. If there is no advertising budget, sharing radio PSAs or coordinating on-air interviews with local radio stations is another way to build awareness of the services and support provided by the grant.
- *Websites:* The organization or program website is an excellent way to provide practical information about how to obtain services to participants and to community members that are seeking to engage with your organization. The organization will benefit from keeping the website current and easy to navigate, especially if using QR codes that direct the reader to the activities, services, and programs of a specific event. Note that all websites funded with federal funds must meet the accessibility

requirements established by section 508 of the Rehabilitation Act of 1973. See Section 4d of this TEGL for more information about ensuring accessibility of online/electronic and hard copy materials.

- *Email Communication*: Email remains a useful way to disseminate information to participants and to potential partners in and outside the public workforce system. Signature lines can include an additional website link, QR code, or description of an upcoming event or workforce activities, services, and/or program offerings. Use plain language wherever possible.
- *Text Messaging (SMS) Applications*: Grantees can continue outreach to program participants with text messaging applications. These may be particularly well-suited to grantees who need to communicate with participants in real time (e.g., those that pair participants with case managers). Additionally, this modality is a way to remind participants of upcoming appointments or outstanding documents, to promote a new program/service offering, or to send out employment opportunity notices. Text messaging applications can also bolster traditional and effective word-of-mouth outreach by prompting participants who may be in the company of other potential eligible candidates to speak about the opportunity, to put it on their social media accounts, or to forward the text to others who may benefit. Another advantage of some texting tools are functions that can automate messages to go out at certain times to groups of people, and even to track analytics, such as if and when people open the messages or click on embedded links. Such data can be helpful for programs to use to adapt their outreach. As with all activities, grantees must ensure participant data privacy. It is important that grantees review the data privacy policies of these text messaging applications and other social media platforms prior to use.
- *Social media*: The use of grant funds to create social media accounts, such as Instagram, Facebook, LinkedIn, and other platform accounts to promote the grant services offered, raise awareness of the program, and strengthen relations with the community is an effective way to virtually connect with customers regardless of their distance from the organization. This is not an exhaustive list; however, grantees must comply with the grant award terms, especially those for prohibited platforms/vendors. For instance, the grantee can follow other local community-based organizations on social media, “like” their Facebook stories, congratulate their progress on LinkedIn, and share photos and short clips of them on Instagram (and do not forget to tag them). These all may be cost-effective ways to create a social media presence online. Please note there may be Federal or state laws that prohibit the use of certain platforms, so grantees should be aware of any restrictions before use. In addition, grant award terms may prohibit certain activities, such as lobbying. These restrictions apply to social media activity as well.

- *Quick Response Codes, also known as QR Codes:* QR codes are a square holding a barcode-like graphic, comprised of machine-readable information. When someone uses a cell phone to take a picture of the QR code, the phone recognizes the machine-readable information and can then go to a specific website. QR codes are a quick way to disseminate information and are used in every facet of life, from viewing a menu at a restaurant to shopping. These codes can provide information about a product or service, which is then delivered quickly to a user's device. QR codes require minimal space, are easy to scan, can store a good amount of information, and can be used to link to text, digital business cards, multimedia, and social media channels.
 - *Influencers:* Influencers are people that have often amassed large followings via different types of media platforms and use their power of influence to communicate information. Influencers may be able to assist grantees in conducting outreach activities by communicating to potential participants what programs and services they offer. Grantees using a contracted personality should provide details/speaker's notes to the influencer to promote the Federal award's activities, services, and programs. When considering whether to use an influencer for outreach, one should consider the Uniform Guidance's Cost Principles, including that all influencer-related costs must satisfy the allowability factors in 2 CFR 200.403 and must adhere to the advertising and public-relations cost rules in 2 CFR 200.421. Other criteria to consider are the influencer's reputation, follower base, any state or local vetting requirements, the receptivity of potential participants, the technology access of participants, and the cost/benefit compared to a more traditional outreach modality. Influencer use is an outreach strategy that may be a powerful recruitment tool when assessed and used properly.
 - *Blog and Podcast Interviews:* These platforms usually contain interactive content that may be individually or serially posted and can discuss a Federally-funded activity, service, or program offering to a specifically targeted audience. They are typically short in length, and access to some podcasts may require a subscription service. The frequency of use, potential participant cost, and availability of ongoing content should all be considered when undertaking this outreach modality.
- d. *Outreach for Individuals with Disabilities:* Grantees must make information about their services accessible to individuals with disabilities by providing auxiliary aids and services, including information in alternative formats, and can use grant funds to ensure outreach materials (including, for example, printed materials, forms, and presentations) are accessible. In addition, when developing, procuring, maintaining, or using electronic and information technology with Federal funds, including websites and electronically stored documents or information, grantees should provide access to and use of information and data for individuals with disabilities that are comparable to what is provided for individuals without disabilities. Grantees can refer to General Services Administration's (GSA's) website on electronic and

information technology accessibility (www.Section508.gov) as a resource. GSA is the federal government's technical advisor for digital accessibility and provides guidance and training in numerous areas. Document creation software like Microsoft Office Suite has tools and accessible design templates that can help to create accessible content from the start. Moreover, when designing websites, accounting for accessibility at the outset is much easier than adjusting the site later to make it accessible for customers. Specific accessibility standards also apply to QR codes. DOL's Office of Disability Employment Policy provides resources to help employers create better job opportunities and workplaces for people with disabilities, including guides, research, and technical assistance including multiple resources about workplace accessibility and reasonable accommodations in the workplace. The [Job Accommodation Network \(JAN\)](#) offers a Workplace Accommodation Toolkit with practical support for organizations.

As noted above, this guidance provides multiple examples but does not address every potential scenario. ETA encourages grantees to review their plans for outreach and consider the examples provided in order to most effectively reach and best serve jobseekers and employers.

5. **Inquiries.** Please direct inquiries to the appropriate DOL-ETA Regional Office or Perkins Coordinator.

6. **References.**

- Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128, 29 U.S.C. 3101 *et seq.*;
- Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), Pub. L. 109-270, 20 U.S.C. 2301 *et seq.*;
- The Nondiscrimination and Equal Opportunity Provisions (Section 188) of WIOA: <https://www.ecfr.gov/current/title-29/subtitle-A/part-38>;
- Rehabilitation Act of 1973, Pub. L. 93-112, 29 U.S.C. 701 *et seq.*;
- Uniform Guidance, 2 CFR Part 200, and DOL's exceptions, 2 CFR Part 2900;
- TEGL No. 16-16, *One-Stop Operations Guidance for the American Job Center Network*, <https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-16-16>;
- TEGL No. 17-16, *Infrastructure Funding of the One-Stop Delivery System*, <https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-17-16>; and
- Consolidated Appropriations Act, 2026, Pub. L. 119-75 (February 3, 2026).

7. **Attachment.** Not applicable.