

**U.S. Department of Labor
Employment and Training Administration
Native American Employment and Training Council**

February 28th, 2024

Julie Su, Acting Secretary
U.S. Department of
Labor Frances Perkins
Building 200
Constitution Ave., NW
Washington, DC 20210

Dear Acting Secretary Su:

Pursuant to the Workforce Innovation and Opportunity Act (WIOA) of 2014, the Native American Employment and Training Council (NAETC or Council) is pleased to provide, for your consideration, our latest recommendations to continue to improve the WIOA Section 166 Indian and Native American Program.

These recommendations were adopted by the Council at our Federal Advisory Council meeting on December 7, 2023. They were informed by input from numerous subject matter experts and members of the public. They support the intent of the President, Congress, and your efforts to ensure that we continue to strengthen the Indian and Native American Program.

One of the continuing challenges for Native communities is unemployment. The rates of joblessness within Native communities consistently outpace the national average. The advent of the pandemic exacerbated this issue, with the peak of the crisis witnessing 26.3% of the Native workforce without employment. This statistic is particularly disheartening considering the fact that a significant proportion of Native workers are engaged in frontline service sector jobs, sectors that bore the brunt of the pandemic's economic fallout.

The NAETC supports your workforce efforts described by Deputy Secretary Lenita Jacobs-Simmons in cultivating a culture of diversity and inclusion to help mitigate many issues impeding Native workforce development goals. Your strong commitment to equity and inclusion, highlighting a whole government approach to addressing workforce development needs in specific communities, including tribal communities, acknowledges and values individual differences that can be leveraged in a variety of perspectives to overcome challenges in achieving a diverse workforce. This includes ensuring Native Americans have adequate representation in our workforce and advocating for the implementation of flexible and inclusive workplace practices.

Access to economic resources presents another hurdle. The intricacies of Federal processes often leave our communities struggling to secure funds for workforce development and job creation. These complexities can feel like navigating a labyrinth without a guide. The NAETC is confident that streamlining these processes and providing additional support can help our communities access the benefits from the historic investments championed by the current administration.

A paramount priority for the NAETC is our younger Native population. With a large segment poised to enter the workforce, there is a pressing need for targeted efforts for job creation and

**U.S. Department of Labor
Employment and Training Administration
Native American Employment and Training Council**

skill development. These efforts must incorporate a long-term and sustainable strategy.

In light of these challenges, we're seeking your support in implementing solutions that can help enhance the economic well-being of Native American communities. The NAETC is optimistic that together, we can ensure a truly inclusive recovery from the pandemic and improve the lives of Native Americans through our shared Native American workforce development goals.

Thank you for your attention to these matters.

Respectfully Yours


Joseph Quintana, Chair

**U.S. Department of Labor
Employment and Training Administration
Native American Employment and Training Council**

Native American Employment and Training Council Members

Representing	Name	Organization
Region 6	Jacob Bernal	Tucson Indian Center
Other Disciplines	Kim Kaniatobe Carrol	Cherokee Nation
Region 4	Lora Ann Chaisson	Inter-Tribal Council of Louisiana, Inc.
Region 4	Lorraine Edmo	Native American Professional Parent Resources
Other Disciplines	Patricia Hibbeler	Confederated Salish and Kootenai Tribes
Region 5	Robert Houle	Bad River Health and Wellness Center
Region 6	Shawn Isaac	Torres Martinez Tribe
Region 3	Candace Lowry	North Carolina Commission on Indian Affairs
Region 6 (Alaska)	Holly Morales	Cook Inlet Tribal Council
Region 4 (Oklahoma)	Erwin Pahmahmie, Jr.	Cheyenne and Arapaho Tribes Department of Labor
Region 5	Angel Peer	American Indian Council, Inc.
Region 6	Joseph Quintana	United American Indian Involvement, Inc.
Region 6	Gary Rickard	Wintu Tribe of Northern CA
Other Disciplines	Kay Seven	Nez Perce Tribe-Education Department Career CenterProgram
Regions 1 & 2	Darrell Waldron	Rhode Island Indian Council, Inc.
Region 6	Winona Whitman	Alu Like, Inc.
Other Disciplines	Jacob Wojnas	Te wa tha hon:ni Corporation

**U.S. Department of Labor
Employment and Training Administration
Native American Employment and Training Council**

Draft NAETC Recommendations:

Ensure Grantee Engagement for Implementation of Updated Census Data

The Council recognizes the importance of leveraging the most recent Census data in accordance with WIOA law and regulations. The process and timing of when new data is implemented is key to supporting the ongoing operations of grantees and should follow the hold harmless provisions of the law. The hold harmless provisions accommodate a phase-in process of the new data and the calculation of funding allocations. The council recommends a transparent process be deployed with implementing the updated data including the preliminary release of allocation proposals that allows for comprehensive grantee input prior to finalization. We also recommend that the period between the implementation of new census be commensurate with minimizing disruptions to grantee operations resulting from fluctuations that may occur in the data. The goal is to guide future funding decisions and fortify the WIOA 166 program's long-term viability. Furthermore, the Council requests a detailed analysis on the effects of allocation changes and the ACS data used to make those calculations.

Enhance Awareness and Access to Workforce Resources

The NAETC emphasizes the importance of increasing awareness and access to resources available to support Native workforce development efforts.

A considerable portion of Native American communities encounter challenges when attempting to access federal funds. These challenges primarily stem from the intricate nature of the application and reporting procedures associated with these funds. The complexity of these processes can often act as a barrier, preventing Tribal organizations from fully accessing and utilizing the resources available to them.

In light of these challenges, the council recommends creation of comprehensive programs to increase awareness about the various resources available for workforce development and simplify the process of accessing these resources. This could involve conducting informational sessions, distributing educational materials, organizing workshops to educate community members about these resources, streamlining the application and reporting processes for Tribal workforce development organizations, providing assistance with applying for opportunities, and offering enhanced guidance on how to comply with reporting requirements.

Sharing the success of events such as the Department of Labor's (DOL) December 2023 Good Jobs in Tribal Communities meeting highlight the effectiveness of federal funding programs, apprenticeship programs and NAETC recommends continuing these types of meetings annually focusing on specific industry sectors are beneficial to tribal communities helps create a sustainable dialogue.

By implementing such programs, we can ensure that Tribal workforce development organizations and communities are aware of the resources available and able to access and utilize

**U.S. Department of Labor
Employment and Training Administration
Native American Employment and Training Council**

them effectively. This can help contribute much needed resources for the development of the Native workforce.

Streamline Grants Management and Fund Distribution

As the DOL continues the rollout of its new grants management system, NAETC suggests the implementation provides for a more efficient process.

The Department of Labor's processes related to the management and distribution of grants play a pivotal role in Native workforce development programs. To enhance the effectiveness of these programs, it is crucial to streamline these processes. The goal is to reduce administrative burdens and allow Tribal workforce development organizations to concentrate on their core mission of improving the plight of the Native American workforce.

WIOA Section 166 Grantees have experienced a substantial increase in navigating the new grants management system. The experiences have been tied to the fact that INA grantees receive annual allotments for the four-year funding cycle. The system requires reporting on multiple grant numbers and redundant reporting for the same grant. The elimination of these administrative burdens will help Tribal workforce development organizations with the limited staff performing multiple functions to focus on mission critical activities.

Grantee Support

Providing increased support for grantees can help them navigate federal processes more effectively and utilize funds in a more efficient manner. Also, providing technical assistance (TA) and training helps them understand and navigate the reporting systems and accountability requirements and stay in compliance. The council notes the continued loss of Tribal workforce development organizations because of compliance issues. More oversight is recommended. During our December Council meeting, DOL's Employment and Training Administration (ETA) Deputy Secretary Lenita Jacobs-Simmons, expressed her understanding of the need for increased oversight and pledged to make these additional resources available to support more oversight through your DOL Division of Indian and Native American Programs (DINAP). More DINAP presence and visibility in the field promotes grantee compliance and accountability. Deputy Secretary Jacobs-Simmons also pledged to deploy Regional resources, already in the field, to support INA grantees. We recommend that Deputy Secretary Jacobs-Simmons promise to deploy additional resources be honored.

Promoting grantee best practices by facilitating grantees to share their best practices and lessons learned with each other. The Council emphasizes the need to learn from successful WIOA Section 166 grantees and apply those strategies systematically. Being consistent in providing TA and training and supporting program documentation, such as procedure manuals are vital. DOL should focus efforts on training Tribal workforce development organization to use existing data such as the Grants Management Performance Monitoring System data, census data, Labor market Information data, and others to help them achieve continuous program improvement through data driven decision making. DOL should also facilitate grant-writing workshops to

**U.S. Department of Labor
Employment and Training Administration
Native American Employment and Training Council**

clarify what the Department looks for in applications to help ensure Tribal workforce development organizations are included in these opportunities. Deputy Secretary Lenita Jacobs-Simmons made a pledge during the Council meeting to provide resources to facilitate grant-writing workshops to help Tribal workforce development organizations understand what the Department is looking for in grant applications, ensuring that tribal communities are included in these opportunities. NAETC highlights the need for education and enforcement processes to address issues faced by rural and urban Tribal workforce development organizations and populations. DOL should also urge state officials to follow existing policies that integrate the Native workforce into their workforce development efforts.

These strategies align with the Federal government's broader efforts to reduce administrative burdens and improve the effectiveness of public benefits programs. They underscore the importance of collaboration and mutual respect in working with Tribal workforce development organizations. They also reflect a comprehensive approach to enhancing workforce development, training, and support for Native American workforce development efforts, emphasizing the importance of leveraging successful practices, improving data utilization, and ensuring that training and support activities are culturally and contextually appropriate.

Enhancing Tribal Workforce Development through Strategic Good Jobs Summit Initiatives

The Council acknowledges the crucial role of the December 2023 Good Jobs Summit in advancing job quality and providing a forum for discussions about overcoming barriers in tribal communities. Recognizing the necessity for augmented funding and improved access to apprenticeship programs, we recommend the expansion of the Summit to support ongoing investment in tribal communities. The Council recommends annual Tribal Good Job Summits that include a focused approach for communicating with NAETC for planning future events that ensure advance notification to NAETC members. A focus on leveraging DOL's Tribal consultation policy will facilitate informed NAETC participation.

Additionally, synchronizing the timing of the Tribal Good Jobs Summit with the White House Tribal Summit could significantly improve coordination and elevate the impact, aligning the efforts of the broader Tribal community with our shared goal of fostering workforce development and economic empowerment in Tribal regions. Inclusion of NAETC in the planning and development of future Summits is a fundamental step towards ensuring that these events are tailored to the unique needs and aspirations of Tribal communities, thereby maximizing their relevance, effectiveness, and transformative potential.

Ensure Continuity and Effectiveness of Council Operations

Ensuring the continuity and effectiveness of the operations of the NAETC is vital for the successful implementation of our programs. We propose conducting regular reviews and updates of our operational strategies to ensure they remain effective and responsive to the needs of Native American communities.

Implement Staggered Terms for Council Members

**U.S. Department of Labor
Employment and Training Administration
Native American Employment and Training Council**

Introduce staggered terms to prevent the simultaneous expiration of all members' terms. This would help ensure that experienced members remain on the council at any given time, facilitating the transfer of knowledge and maintaining the council's progress to achieving strategic goals. For example, NAETC membership could be divided into cohorts where the terms of each group expire in different years.

Make Timely Appointments

Amend the council's charter to include clear timelines and processes for the appointment of new members. This involves setting specific deadlines for the nomination and confirmation of council members to minimize vacancies and ensure the council is always fully staffed.

In conclusion, these recommendations aim to address the current challenges in workforce development in Native American communities. We look forward to your support in implementing these recommendations and continuing our shared commitment to improving workforce development in Native American communities.