



May 3, 2024

Joseph Quintana, Chair
Native American Employment and Training Council
1453 W Temple St
Los Angeles, CA 90026

Dear Mr. Quintana:

Thank you for your February 28, 2024, letter transmitting six recommendations from the Native American Employment and Training Council (NAETC or Council), informed by significant input from subject matter experts and the public and adopted at the Council's December 2023 meeting. I thank all past and present members of the Council for your continued commitment to improving the livelihoods and workforce development of Native American communities. The U.S. Department of Labor (Department) will consider NAETC's recommendations in future grant-making, technical assistance, and program implementation. The Department provides the following responses to the Council's recommendations.

Recommendation One: Ensure Grantee Engagement for the Implementation of Updated Census Data

NAETC recommends transparency in the process for updating data, sharing preliminary allocation proposals, allowing grantee input prior to finalization, and minimizing grant operations disruptions. The Department agrees it is important to leverage the most recent Census data to support the ongoing operations of grantees and agrees with the recommendation for a transparent process in its implementation. The Department was grateful for the extensive input the Council and its subcommittee provided, which forms the basis for the Program Year (PY) 2024 Indian and Native American (INA) program allotment under Workforce Innovation and Opportunity Act (WIOA) Section 166, which include a hold harmless factor. The Department has shared information on the allotments with all grantees, and commits to engaging with the Council and grantees every year about the underlying data used in allotments. The Department is also committed to continuing to use hold harmless factors in the implementation of future new Census data to minimize potential disruptions in INA grantee services.

Recommendation Two: Enhance Awareness and Access to Workforce Resources

NAETC recommends increasing awareness of and simplifying access to workforce development resources as well as the continuation of annual dialogues focused on specific industry sectors. The Department agrees on the importance of Tribes' awareness about available resources and the barriers that grant processes can create, and continues to take steps to address these barriers. For example, the Department specifically identifies Tribal organizations as eligible applicants in grant opportunities, and has held pre-applicant webinars specifically for Tribes. The Department is also examining its grant designs under Executive Order (EO) 14112, *Reforming Federal Funding and Support for Tribal Nations To Better Embrace Our Trust Responsibilities and*

Promote the Next Era of Tribal Self-Determination. This EO asks all grant-making agencies, including the Department of Labor, to work with White House Council on Native American Affairs identify potential opportunities for Federal policy reforms that would promote accessible, equitable, and flexible administration of Federal funding and support programs for Tribal Nations.

The Department is also committed to continuing dialog about the effectiveness of workforce investments, and looks forward to future events that have elements similar to the 2023 Good Jobs in Tribal Communities event. The Department is grateful for the input of NAETC members who participated in advising the Employment and Training Administration and Chief Evaluation Office on a forthcoming Equity Roundtable featuring lessons learned and evidence gathered from Tribal workforce development initiatives.

Recommendation Three: Streamline Grants Management and Fund Distribution

NAETC recommends streamlining the processes related to the management and distribution of grants and eliminating administrative burdens in the new grants management system. The Department agrees that grantees should be able to navigate the grants management system more easily, and has implemented steps to streamline the grants management process to reduce burdens on Tribal workforce development organizations and program participants.

In 2023, the Department implemented a new grant awards system and migrated from an unstable legacy system. This migration created unforeseen challenges and delays in awarding PY 2023 grants. The new system also required INA program grantees to submit quarterly financial reports after grant funds were fully expended. The Department has resolved most of the challenges with the new system and continues to work on any remaining issues. For instance, the Department is adjusting the system to eliminate extraneous reporting after grant funds are fully expended. As the full implementation of the system rolls out, the Department expects additional opportunities to enhance the system and produce more efficiencies.

Recommendation Four: Grantee Support

NAETC recommends increased oversight, technical assistance, and peer-to-peer best practices exchanges. The Department agrees that oversight and technical assistance are important for an effective program. The Department commits to using its available resources to conduct on-site and virtual monitoring of grantees, and has already conducted monitoring trips in Fiscal Year 2024. The Department will deliver technical assistance, including sharing best practices, at the May 2024 National Indian and Native American Employment and Training Conference, including workshops on the use of the Grants Performance Monitoring System, which serves as a participant tracking system and helps streamline reporting; on flexibilities in the use of grant funds; and on submitting financial reports. Additionally, the Department plans a half-day forum to allow grantees to discuss and share best practices in administering INA programs.

Recommendation Five: Enhance Tribal Workforce Development through Initiatives like the Tribal Good Jobs Summit

NAETC recommends early Council involvement in the planning of future events like the 2023 Good Jobs in Tribal Communities event, and timing it with future White House Tribal Nations Summits. The Department agrees that Tribal input is important in any convening meant to benefit Tribes, and will consider NAETC’s suggestions for future events’ timing and content.

Recommendation Six: Ensure Continuity and Effectiveness of Council Operations through Implementation of Staggered Council Member Terms and Timely Appointments

NAETC recommends two operational strategies for the Council: staggered terms for Council members, and making timely appointments. The Department agrees that timely appointments are very important for the continuity and success of the Council, and ETA remains committed to maintaining NAETC and providing Council member nominees for the Secretary’s consideration in a timely manner. The Department made the most recent appointments in February 2024, prior to the March 2024 expiration of the previous Council members’ terms. The current NAETC charter does not establish staggered terms, but the Department will examine the charter’s membership term provisions and determine whether any changes are appropriate when the charter is due for renewal.

Thank you for your input as well as your service to the Council and the INA community. The Department values your feedback and input. If you have any additional questions, please feel free to contact me at (202) 693-2722.

Sincerely,



JOSÉ JAVIER RODRÍGUEZ