

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION INA PY 2024 Funding Allocations
	CORRESPONDENCE SYMBOL OWI-DINAP
	DATE June 11, 2024

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 16-23

TO: ALL WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) SECTION 166 INDIAN AND NATIVE AMERICAN (INA) GRANTEEES

FROM: JOSÉ JAVIER RODRÍGUEZ /s/
Assistant Secretary

SUBJECT: Program Year (PY) 2024 Funding Allotments and Application Instructions for the WIOA Section 166 INA Programs Grantees

1. **Purpose.** To provide WIOA Section 166 INA Program grantees with Comprehensive Services Program (CSP) and Supplemental Youth Services Program (SYSP) funding allotments for PY 2024.
2. **Action Requested.** Grantees must follow the requirements in this guidance to receive PY 2024 funding. Applications and all documents must be submitted through the Grants.gov website at www.grants.gov. We will not accept applications through the mail, email, or fax. For Federally recognized tribes that participate in Public Law 102-477, the Employment and Training Administration (ETA) will transfer PY 2024 WIOA Section 166 INA Program funds to the Department of the Interior (DOI), Bureau of Indian Affairs, Office of Indian Services, Division of Workforce Development. These tribes are not required to submit the documents requested in this Training and Employment Guidance Letter (TEGL) but should instead follow DOI’s requirements for receiving funds.
3. **Summary and Background.**
 - a. Summary - ETA is issuing this TEGL to:
 - 1) notify WIOA INA Program grantees of PY 2024 grant allocations;
 - 2) provide submission requirements to receive grant funding; and
 - 3) describe the process for requesting an increase in the administrative cost limit.
 - b. Background – On March 23, 2024, the Further Consolidated Appropriations Act, 2024 (Public Law 118-47) was signed into law, authorizing a full-year fiscal year 2024 appropriations. The Act provides \$60 million for the WIOA Section 166 INA Programs. Of this amount, \$600,000 will be set-aside for technical assistance pursuant to 20 CFR 684.270(e). Therefore, the total amount available for the INA CSP is **\$59,400,000**. This amount will be allocated to INA Program grantees using the formula at 20 CFR 684.270(b).

The Act also provides approximately \$948,130,000 for grants to states for WIOA Youth activities. After reducing the appropriation by \$3,131,000 for set asides authorized by the

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Act and reserving \$925,200 for Migrant and Seasonal Farmworker (MSFW) Youth, \$944,073,800 is available and 1½ percent of this amount is reserved for the WIOA Section 166 INA SYSP. Accordingly, **\$14,161,107** is available for PY 2024 SYSP and will be allotted to INA Program grantees to provide supplemental services to low-income Native American youth on or near Indian reservations and in Oklahoma, Alaska, and Hawaii. ETA will allocate SYSP funds to WIOA INA Program grantees using the formula described in the WIOA regulations at 20 CFR 684.440.

4. **U.S. Census Bureau Data used for Calculating PY 2024 Funding Allotments and Hold-Harmless Process.** For PY 2024, as required by WIOA, ETA is using the U.S. Census Bureau’s 2014-2018 American Community Survey data for the WIOA Section 166 INA Program allotment formula. The updated WIOA Service Delivery Area data along with CSP and SYSP Census numbers can be found at: dol.gov/agencies/eta/dinap/census.

To minimize program disruptions, ETA is implementing a hold-harmless or phase-in approach to adjusting funding allotments resulting from use of the updated population data in the funding formula. Pursuant to WIOA 20 CFR 684.270(c), ETA is applying the hold-harmless approach after consulting with the grantee community and the Native American Employment and Training Council beginning with the PY 2024 funding allotments.

The hold-harmless or phase-in process compares each grantee’s relative share (or percentage) of the Census data’s total relevant population to the grantee’s relative share (percentage, not dollars) of the prior year’s (PY 2023) funding allotments. Therefore, when the hold-harmless is applied, a grantee will receive funding for PY 2024 based on no less than 95 percent of their prior year relative share (percentage, not dollars).

Additionally, the hold-harmless approach will be in effect over a three-year period, PY 2024 through PY 2026, applied against the prior year relative share (percentage, not dollars). The hold-harmless levels for the CSP and SYSP will be 95 percent for PY 2024, 90 percent for PY 2025, and 80 percent for PY 2026. In PY 2027, all grantees will receive funding that reflects their actual relative share based on the updated data provided by the U.S. Census Bureau.

- a. **Submission Requirements.** Grantees must use the funding allotment amounts in Attachment I of this TEGl, ensuring their amount is reflected across all documents included in the application package. The application package must include the SF-424 *Application for Federal Assistance*, the SF-424A *Budget Information* form, and a Budget Narrative describing the projected costs entered for each line item of the SF-424A. Grantees that have an indirect cost rate must also submit a copy of their Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan (if applicable). In addition, grantees that would like to request an administrative cost limit above 15 percent, but not more than 20 percent, must submit such a request with the application. See below for additional information on submitting a request for an increase in the administrative cost limit.

Grantees receiving both CSP and SYSP funds will receive a separate grant for each; therefore, grantees must submit separate application packages for each set of funds under the associated funding opportunity numbers in Grants.gov:

- Applications for INAP Adult funding submit under ETA-INAP-TEGL-16-23-IA
- Applications for INAP Youth funding submit under ETA-INAP-TEGL-16-23-IY

Grantees must submit the SF-424, SF-424A, and Budget Narrative (and a NICRA or Cost Allocation Plan, if applicable) within 30 days from the issue date of this TEGL.

- i. Request for an Administrative Cost Rate Above 15 Percent.** Administrative costs are defined in the WIOA regulations at 20 CFR 683.215. The grant terms and conditions limit administrative costs for INA grants to 15 percent. However, ETA will approve administrative cost rates of more than 15 percent, but not greater than 20 percent, when the grantee submits acceptable justification. Grantees must include with their application package a description of the conditions that exist within its organizations that require an administrative cost rate above 15 percent. Such conditions may include:
- The amount and nature of on-going direct and indirect administrative costs.
 - Local economic conditions such as the cost to rent space, paying salaries that are competitive with other employers in the local area to attract qualified and experienced employees, providing salary increases and other pay incentives to retain good employees.
 - The amount and nature of any uncontrollable increases in the grantee’s current administrative costs that are unusual one-time expenses, including significant increases to basic administrative cost components such as rent or staff salaries. (Supporting documentation is required.)
 - How the grantee already supplements the funds it receives from ETA for administrative expenditures with funds from other sources in order to meet its necessary administrative costs.
- b. Grants.gov Submission Process.** Grantees must submit the application package described in section 4a, above through Grants.gov at www.grants.gov. To submit the application package through Grants.gov, an individual in the grantee organization must be registered as an Authorized Organization Representative (AOR) with Grants.gov. Follow the steps below to submit the required documents for PY 2024 funding through Grants.gov.

Step 1: Go to www.grants.gov.

Step 2: Click on LOGIN in the upper right-hand corner of the screen and log into grants.gov with your username and password.

Step 3: Once you are logged into Grants.gov, select the APPLICANTS tab on the Grants.gov homepage and then select Apply Now from the pull-down menu.

Step 4: In the Funding Opportunity Number field, enter the number corresponding to the type of funding requested (Adult or Youth), as referenced in Section 4a above. Skip to the Opportunity Package ID and go down to the Application Filing Name field and enter an application filing name and click on Create Workspace. Note: The Applicant Filing name can be any name you wish to use, and it will become the name for the Workspace.

Step 5: Click on the links in the Application Package Forms and complete all required forms.

Submitting the SF-424 through Grants.gov constitutes an electronically signed SF-424, Application for Federal Assistance. Item #18 on the SF-424 must reflect the exact amount of

the allotment in Attachment I. Additionally, Item #11 of the SF-424 must include the Assistance Listing #17.265 for Native American Employment and Training. Submission requirements stipulate that all applicants for Federal grant funding opportunities must have a Unique Entity ID (UEI), a 12-character alphanumeric ID assigned to an entity by SAM.gov. The UEI number must be included on the SF-424 and must supply their UEI number on the SF-424.

Please be aware that you cannot submit an application through Grants.gov if your organization does not have an active registration in the System for Award Management (SAM). Grantees can find out if they have an active SAM registration by going to: www.sam.gov and clicking on the Search Records tab. Then enter your organization's UEI and click on the Search button. For assistance with SAM registration, please call the SAM Federal Service Desk at: (866) 606-8220.

5. Inquiries. Please direct questions to the designated Federal Project Officer below.

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6. References.

- Further Consolidated Appropriations Act, 2024 (Public Law 118-47) available at: <https://www.congress.gov/bill/118th-congress/house-bill/2882>
- Section 166 of the WIOA (29 U.S.C.3221) available at: <https://www.govinfo.gov/content/pkg/USCODE-2022-title29/html/USCODE-2022-title29-chap32-subchapI-partD-sec3221.htm>
- WIOA; Department of Labor Only, Final Rule at 20 C.F.R. Part 684 available at: <https://www.ecfr.gov/current/title-20/chapter-V/part-684>
- TEGL 15–14, December 19, 2014, *Implementation of the New Uniform Guidance Regulations*, available at: http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5740T

7. Attachment. Attachment I: PY 2024 INA Program Adult and Youth Funding Allocations