

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Trade Adjustment Assistance
	CORRESPONDENCE SYMBOL OTAA
	DATE July 22, 2025

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 01-25

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
AFFILIATE AMERICAN JOB CENTER MANAGERS
COMPREHENSIVE AMERICAN JOB CENTER MANAGERS
STATE WORKFORCE ADMINISTRATORS
STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
STATE LABOR COMMISSIONERS
RAPID RESPONSE COORDINATORS
TRADE ADJUSTMENT ASSISTANCE LEADS

FROM: LORI FRAZIER BEARDEN 
Acting Assistant Secretary

SUBJECT: Process for Requesting Fiscal Year (FY) 2025 Trade Adjustment Assistance (TAA) Program Training and Other Activities (TaOA) Funds, SF-424 Instructions, and Grants Management Requirements Relating to TAA TaOA Funds. **FY 2025 TaOA Funds are Available by Request Only**

1. **Purpose.** To advise State Workforce Agencies, or agencies designated by Governors as “Cooperating State Agencies” (CSAs) (also jointly referred to as “states”) of the “by request” process and associated deadlines for receiving FY 2025 TAA Program TaOA funds.
2. **Action Requested.** States must implement the guidance provided herein, which outlines the process for requesting and obtaining FY 2025 TAA TaOA funds.
 - a. States must request FY 2025 TaOA funds, if needed, by submitting Form ETA-9117, including the amount of funding requested and a narrative justification for funds **no later than 20 calendar days** from the publication date of this guidance. As a part of the request, states must complete and submit Form SF-424 via www.grants.gov. FY 2025 TaOA funds are limited and will be awarded based on demonstrated need. The Department will analyze each request and approve or deny the state’s request on a case-by-case basis as described in section 4.b. below.

RESCISSIONS None	EXPIRATION DATE Continuing
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3. Summary and Background.

- a. Summary – [Training and Employment Guidance Letter \(TEGL\) No. 24-20](#) and its [Change 1](#)¹ reminds states that as of July 1, 2022, the TAA Program entered phaseout termination. This guidance also informed states that although the termination provision of the Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015) prohibits the Department from certifying petitions for TAA group eligibility on and after July 1, 2022, workers certified as eligible to apply for assistance under a petition certified prior to July 1, 2022, and who were separated on or before June 30, 2022, continue to be entitled to TAA. The TAA program has been in phaseout termination status for four years, and the Department has found that state funding needs now vary significantly from state to state and as compared to pre-termination needs. Based on the changing needs of the TAA Program, the Department determined that the most efficient and effective method to distribute FY 2025 TaOA funds is for states to request funding according to their needs rather than using a predetermined formula to allocate funds.
- b. Background – States should make every effort to prioritize funding for those activities necessary to support winddown/phaseout of the TAA Program. The Department is not rescinding TEGL No. 24-20; however, there is no pending legislation to reauthorize the TAA Program. Importantly, the amount of funding appropriated by Congress for the Trade Program has decreased significantly from prior year appropriations predating phaseout termination, so the Department is managing the allocation of funds accordingly.

4. FY 2025 TaOA Funds.

- a. Limited FY 2025 TaOA Funding – The Trade Act of 1974 (Pub. L. No. 93-618), as amended (the Trade Act) (codified at 19 U.S.C. §§ 2271 et seq.), Title II, Chapter 2, established the TAA, Alternative Trade Adjustment Assistance (ATAA), and Reemployment Trade Adjustment Assistance (RTAA) programs. These programs, collectively referred to as the TAA Program, provide assistance to workers who have been adversely affected by foreign trade. Funding for the TAA Program is provided in the Federal Unemployment Benefits and Allowances (FUBA) section of the annual budget. The Full-Year Continuing Appropriations and Extensions Act, 2025, (Pub. L. 119-4), enacted March 15, 2025, appropriates \$33,900,000 for FUBA in FY 2025. The \$33,900,000 appropriation is subject to sequestration in accordance with the Balanced Budget and Emergency Deficit Control Act of 1985 (BBEDCA), as amended by the Budget Control Act of 2011 (BCA). After applying the sequestration reduction, \$31,967,700 remains available for FY 2025. On April 29, 2025, Office of Management and Budget (OMB) approved the Department’s request to reapportion the FUBA allocations as follows: \$25,867,700 for TaOA; \$6,000,000 for Trade Readjustment Allowance (TRA) benefits; and \$100,000 for A/RTAA. The

¹ TEGL No. 24-20 and its *Change 1 to the Operating Instructions for Implementing the Reversion Provisions of the Amendments to the Trade Act of 1974 Enacted by the Trade Adjustment Assistance Reauthorization Act of 2015*.

Department allocated \$2,600,000 of TaOA funds to Louisiana and Oregon in amounts of \$100,000 and \$2,500,000, respectively, based on these states' urgent requests for funding, leaving \$23,267,700 available for allocation to states. FY 2025 TaOA funds are available to states that apply for funding using the process outlined in this guidance and demonstrate a need for the funds.

- b. Demonstrated Need – The regulations at 20 CFR § 618.920 provide the criteria for a state to demonstrate their need for TaOA² reserve funds. For the purpose of allocating FY 2025 TaOA funds, the Department is adopting these criteria to approve state requests for such funds as follows:
 - i. A State requesting FY 2025 TaOA funds must demonstrate that:
 - At least 50 percent of the total of the State's FY 2024 and FY 2023 TaOA funds have been expended; or
 - The State needs additional TaOA funds to meet demands for services due to unusual and unexpected events, which includes an unexpected increase in the number of trade-affected workers eligible for TaOA.
 - ii. A State requesting FY 2025 funds must provide a documented estimate of funding needs through the end of the fiscal year. That estimate must be based on an analysis that includes, at a minimum, the following:
 - The average cost of training in the State;
 - The expected number of participants in training through the end of the fiscal year; and
 - The remaining TaOA funds the State has available.
- c. Restrict Outreach – States are required to continue to operate their TAA Programs in accordance with the termination provisions and requirements provided in Attachment III; however, the Department is encouraging states to minimize funding for outreach and prioritize serving existing participants. For example, states could limit outreach to TAA-eligible workers who visit American Job Centers (AJCs) or to workers identified through rapid response activities. Outreach activities should be charged to employment and case management services.
- d. State Administration – 20 CFR § 618.860(b) delineates the permissible activities for which TAA Program TaOA administrative funds may be used. State administrative activities include recommending and reviewing the waiver of the training requirement; issuing, approving, continuing, or revoking training waivers; approving or denying training programs and plans; participating as needed in adjudication or appellate activity associated with any TAA benefit or service; and other administrative activities relating to the TAA Program. The amount of TaOA funds is directly related to the number of workers being served. With no new workers being certified under phaseout termination, states are allocating a higher percentage of their TaOA funds for state administration. To address the need for administrative funding,

² TaOA funds cover the costs incurred in providing training, job search allowances, relocation allowances, state administration, and employment and case management services to workers eligible for TAA.

states may request to use more than 10 percent of the FY 2025 TaOA funds requested for state administration. However, such requests must include a justification for exceeding the 10 percent limitation.

- e. Period of Performance – In compliance with the Uniform Guidance at 2 CFR § 200.403(a), the use of TaOA funds must be necessary and reasonable for the performance of the TAA program. FY 2025 TaOA funds are available for expenditure for three fiscal years (FY 2025, FY 2026, and FY 2027).
- f. Process and Deadlines for Requesting FY 2025 TaOA Funds – Each state in need of funds must utilize the reserve funds process provided at 20 CFR § 618.920 to request such funds. States must complete Form ETA-9117 and email their request to otaa.administrator@dol.gov within 20 calendar days from the publication date of this guidance. In addition, states must complete their Standard Form (SF)-424 and submit this form via www.grants.gov no later than 20 calendar-days from the publication date of this guidance. States must enter the amount requested in Item 18 of Form SF-424. Detailed instructions for submitting the SF-424 are provided below in Section 4.i. **Do not submit SF-424 to otaa.administrator@dol.gov.**
- g. Process for Completing the ETA-9117 – Contact the Regional Office for assistance with completing the ETA-9117. Using the information below, collaborate with the region to determine available FY 2023 and FY 2024 funds, i.e. carry-in funding, and list all unobligated funding in sections 1 through 3 of the form. Complete Justification section as follows:
 - i. Determine the amount needed for state administration, training, case management, job search allowances, relocation allowances, Information Technology (IT), and infrastructure costs.
 - *Note: Training cost calculations should be based on the number of participants currently in training and those expected to enter training before the end of FY 2025, multiplied by the cost of training in the state. Historically, the average training cost per TAA participant is approximately \$13,000. States must provide a justification for the amount of funds requested for state administration if this amount exceeds 10% of the total request.*
 - ii. Calculate infrastructure costs, including committed IT costs.
 - iii. Total the required amount, then subtract the unobligated carry-in funds from this total.
 - iv. Check the calculated request amount for reasonableness.
 - v. Enter the amount of the request and other required information on ETA-9117 form. Be sure to include a narrative explaining the current state of funding and the intended use of the requested funds in the justification.
 - vi. Obtain the necessary signatures and email the request along with any supporting documentation to otaa.administrator@dol.gov.
 - vii. At the same time, within 20 calendar days of the publication date of this guidance, states must complete and submit an SF-424 via www.grants.gov by including the amount of the request. See Section 4.i. below, (Grants Management) for additional information on submitting the SF-424 via www.grants.gov.

- h. Use of FY 2025 Funds – States may use TaOA funds to serve members of worker groups covered by a certification under the 2002 Program, the 2009 Program, the 2011 Program, the 2015 Program, and the Reversion 2021 Program in accordance with the requirements in the TAA law in effect at the time of filing of such petition for certification. TaOA funds cover the costs incurred in providing training, job search allowances, relocation allowances, state administration, and employment and case management services to TAA-eligible workers.
- i. Grants Management – States must submit an FY 2025 SF-424 for the amount requested no later than twenty calendar days after publication date of this guidance. States must: 1) enter the announcement number of this TEGL, ETA-TEGL-NO-01-25, into the opportunity number field of the application, and 2) enter the applicable the dollar amount of funds requested for FY 2025 on Line 18 of the SF-424. Attachment IV of this TEGL provides detailed instructions for submitting the SF-424 and includes links to resources, including customer service contacts and other information, available at www.grants.gov. The Department's Office of Grants Management (OGM), in conjunction with the Office of Trade Adjustment Assistance, will review the submitted application materials and request any updates or corrections as needed. Once approved, OGM will incorporate the application with the Grant Agreement (GA), which will be executed by the Department's Grant Officer and transmitted to the Authorized Representative and the Point of Contact identified on the SF-424 for the state. Any subsequent changes to the information submitted on the SF-424 (individuals identified, address, etc.) must be submitted to the Department as a request to modify the GA via the assigned Federal Project Officer. Links to reporting databases, as well as general guidance on how to administer a grant award, may be found at: <https://www.dol.gov/agencies/eta/grants/management>, TAA Community page at <https://taa.workforcegps.org>, our Office of Grants Management Grants Application and Management community page at: <https://grantsapplicationandmanagement.workforcegps.org/resources/2016/12/14/10/45/Grant-Management-Training>, and in the Uniform Guidance at 2 CFR 200 et. seq. at: [eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#).
- i. **Important: Common Errors on SF-424 Submissions.** Given the compressed timeline, to avoid delays in funding, states should direct special attention to the following areas of the SF-424:
- Line Item #15: States must also provide indirect cost information as a sentence in Line Item #15, Descriptive Title of Applicant's Project, on the SF-424 Form. *Example: "Indirect Costs for this award are estimated at \$19,000."* State grantees may use a federally approved Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan (CAP) rate to calculate indirect costs against their full FY 2025 TaOA allotments to estimate this total. States will not need to provide supporting documentation (i.e., Indirect Cost Rate Agreement or Cost Allocation Plan) in their application to substantiate the amount of Indirect Costs estimated in Item #15. The amount a

state enters for Indirect Costs will not impact the total amount entered in Item #18, Estimated Funding (\$) of the SF-424, i.e., states should enter the amount requested on Item 18.

- Line Item 17: The period of performance for these funds will be 10/01/2024 to 09/30/2027. States must enter this information on Line 17 on their SF-424.

5. **Inquiries.** Please direct inquiries to the appropriate Regional Office.

6. **References.**

- Pub. L. 119-4, Full-Year Continuing Appropriations and Extensions Act, 2025;
- Chapter 2 of Title II of the Trade Act of 1974, as amended (Pub. L. 93-618) (Trade Act) (codified at 19 U.S.C. 2271 et seq.);
- Pub. L. 114-27, Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015);
- TAA Final Rule, 20 CFR Part 618, 85 FR 51896 (August 21, 2020);
- Agreement Between the Governor and Secretary of Labor, United States Department of Labor, to carry Out the Provisions of Subchapters A, B, and C of Chapter 2 of Title II of the Trade Act of 1974, as amended by the Trade Adjustment Assistance Reauthorization Act of 2015;
- Joint WIOA Final Rule, as applicable, published in the *Federal Register* at: <https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15977.pdf>;
- Department-Only WIOA Final Rule, as applicable, published in the *Federal Register* at: <https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15975.pdf>;
- [2 CFR part 200](#) (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) and 2 CFR part 2900 (Department's Supplement to 2 CFR part 200);
- Balanced Budget and Emergency Deficit Control Act of 1985 (BBEDCA), as amended by the Budget Control Act of 2011 (BCA);
- [TEGL No. 14-22](#), *Trade Adjustment Assistance (TAA) for Workers Program Phase-out Termination Frequently Asked Questions (FAQs)*, issued April 14, 2023;
- [TEGL No. 24-20](#), *Operating Instructions for Implementing the Reversion Provisions of the Amendments to the Trade Act of 1974 Enacted by the Trade Adjustment Assistance Reauthorization Act of 2015*, issued June 4, 2021;
- [TEGL No. 24-20, Change 1](#), *Change 1 to Operating Instructions for Implementing the Reversion Provisions of the Amendments to the Trade Act of 1974 Enacted by the Trade Adjustment Assistance Reauthorization Act of 2015*, issued November 25, 2022;
- [TEGL No. 17-16](#), *Infrastructure Funding of the One-Stop Delivery System*, issued January 18, 2027; and
- [TEGL No. 03-19](#), *Real Property Under Employment and Training Administration-Funded Grants*, issued July 15, 2019.

7. **Attachment(s).**

- Attachment I – ETA-9117
- Attachment II – Award Description for Trade Adjustment Assistance (TAA) Program Training and Other Activities (TaOA) Grants
- Attachment III – TAA Program Requirements
- Attachment IV – Submission Instructions for (TaOA) Funding via SF-424 and www.grants.gov



Trade Adjustment Assistance (TAA) for Workers Funding Request Form

1. STATE: _____ **2. AMOUNT REQUESTED:** _____

3. FINANCIAL DATA: (Complete for each relevant fiscal year allocation)

Fiscal Year: _____ **Period Covered by this Report (MM/DD/YYYY)** **From:** _____ **To:** _____

	(1) Administrative Costs	(2) Employment and Case Management	(3) Training and Related Costs	(4) Program Total (2 + 3)	(5) Grand Total (1 + 4)
A. TAA Funds Received to Date					\$
B. Cumulative Obligations	\$	\$	\$	\$	\$
C. Unobligated Balance (A-B)	\$	\$	\$	\$	\$
D. Cumulative Accrued Expenditures	\$	\$	\$	\$	\$
E. Utilization Percentages	% (D1/A5)	% (D2/A5)			

Fiscal Year: _____ **Period Covered by this Report (MM/DD/YYYY)** **From:** _____ **To:** _____

	(1) Administrative Costs	(2) Employment and Case Management	(3) Training and Related Costs	(4) Program Total (2 + 3)	(5) Grand Total (1 + 4)
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C. Unobligated Balance (A-B)	\$	\$	\$	\$	\$
D. Cumulative Accrued Expenditures	\$	\$	\$	\$	\$
E. Utilization Percentages	% (D1/A5)	% (D2/A5)			

Fiscal Year: _____ **Period Covered by this Report (MM/DD/YYYY)** **From:** _____ **To:** _____

	(1) Administrative Costs	(2) Employment and Case Management	(3) Training and Related Costs	(4) Program Total (2 + 3)	(5) Grand Total (1 + 4)
A. TAA Funds Received to Date					\$
B. Cumulative Obligations	\$	\$	\$	\$	\$
C. Unobligated Balance (A-B)	\$	\$	\$	\$	\$
D. Cumulative Accrued Expenditures	\$	\$	\$	\$	\$
E. Utilization Percentages	% (D1/A5)	% (D2/A5)			



Trade Adjustment Assistance (TAA) for Workers Funding Request Form

4. JUSTIFICATION FOR REQUEST:

Certification: I certify that to the best of my knowledge and belief that the information provided herein is accurate and complete, and that report obligations are reflected in agency records.

Signature: _____ Title: _____

Date: _____

Persons are not required to respond to this collection of information unless it displays a currently valid Office of Management and Budget (OMB) control number. Public reporting burden for this collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Labor, Employment and Training Administration, Office of Trade Adjustment Assistance, Room N-5428, 200 Constitution Avenue, N.W., Washington, DC 20210 (OMB Control No. 1205-0275).

**Award Description for Trade Adjustment Assistance (TAA) Program
Training and Other Activities (TaOA) Grants**

Award Description. States receiving an award must comply with the Trade Act of 1974 as amended, the TAA Program Regulations, the Notice of Award which the Department provides at the time of the award, applicable program guidance, applicable agreements governing the TAA Program such as Governor-Secretary Agreement, and the TAA Annual Funding Agreement,

- 1. Purpose:** States may use TAA Program TaOA funds provided under this grant to cover the cost of related state administration and the provision of training, employment and case management services including outreach, job search allowances, and relocation allowances to trade affected workers.
- 2. Activities to be Performed:** Required activities are covered in the TAA Final Rule, 20 CFR part 618, published in the Federal Register on August 21, 2020, applicable statutes, and guidance governing the TAA Program and describe program requirements and states' responsibilities regarding the use of TAA program TaOA funds. Additional guidance is provided in Attachment III of this TEGL.
- 3. Expected Outcomes:** States must use TAA Program funds provided under this grant to operate the TAA Program in support of the goals, objectives, and outcomes provided in the Trade Act of 1974, as amended, the program regulations at 20 CFR part 618, and applicable administrative guidance.
- 4. Intended Beneficiaries:** TaOA grant funds are intended to serve workers who are adversely affected by trade. Adversely affected workers are individuals who, because of lack of work in adversely affected employment, have been totally or partially separated from such employment; and, adversely affected incumbent workers (individuals who (A) are members of a group of workers who have been certified as eligible to apply for adjustment assistance; (B) have not been totally or partially separated from adversely affected employment; and (C) workers for whom the Secretary determines, on an individual basis, are threatened with total or partial separation).
- 5. Subrecipient Activities:** Subrecipient means a non-Federal entity or Federal agency that receives a subaward from the grant award recipient under the TaOA funds award. Subrecipients are accountable to the grantee for the use of the Federal funds provided by the subaward. Specifications of subrecipient activities and the requirements subrecipients must comply with, are set out in the TAA Annual Funding Agreement, which DOL sends to each grantee upon grant award.

TAA Program Requirements

- A. Overview.** The TAA Program provides training, employment and case management services, job search allowances, relocation allowances, Trade Readjustment Allowances (TRA), Alternative Trade Adjustment Assistance (ATAA), and Reemployment Trade Adjustment Assistance (RTAA). TAA Program Training and Other Activities (TaOA) funds provided under this grant award may be used for: the cost of training (and training related costs), employment and case management services including outreach activities, job search allowances, relocation allowances, and related state administration. Funds for TRA, ATAA, and RTAA are governed by the Federal requirements, guidance, and the terms and conditions of the Unemployment Insurance Annual Funding Agreement (AFA).
- B. States' Responsibilities.** The Trade Act of 1974, as amended, 20 CFR part 618, and Agreements Between Governors and the Secretary of Labor, provide guidance on states' responsibilities for ensuring that Workforce Innovation and Opportunity Act (WIOA) partner programs are integrated into the American Job Center (AJC) network, also known as the one-stop system. The TAA Program is a required one-stop partner under the WIOA statute and regulations at WIOA sec. 121(b)(1)(B), 20 CFR § 678.400, 34 CFR § 361.400, and 34 CFR § 463.400, respectively. As a WIOA required partner, the TAA Program is responsible for providing access to TAA benefits and services to adversely affected workers through the AJC network. States must also use their state's AJCs as the main point of contact for participant intake and the delivery of TAA benefits and services.

1) Program Access

If the TAA Program is carried out in a local area, the state must provide access to the TAA Program services in the local area's comprehensive one-stop centers in accordance with 20 CFR 678.305(d) and with WIOA sec. 121(b)(1)(A)(i). Access to the TAA Program occurs in one of three ways:

- a) Option 1: Having a TAA Program staff member, whether fully or partially funded by TAA, physically present at the one-stop center and responsible for TAA;
- b) Option 2: Having a staff member from a different partner program physically present at the one-stop center appropriately trained to provide information to customers about the TAA Program, services, and activities available through all partner programs; or
- c) Option 3: Making available a direct linkage through technology to a TAA Program staff member who can provide meaningful information or services.

The options above offer a wide range of possibilities to partners. Option 2 could require a state to have varying levels of assistance depending on the trade-affected worker's needs. For example, this could be as simple as having an adequately trained one-stop center staff member providing basic program information to a one-stop customer regarding eligibility requirements of the TAA Program. In this example, the partner staff

TAA Program Requirements

member has been trained on TAA Program eligibility requirements, as well as how to search for and file a TAA petition. This option allows the customer to receive high-quality service through the one-stop center in a timely manner.

Option 3, a direct linkage, can take many forms as well. As described in 20 CFR 678.305(d)(3), a “direct linkage” means providing a direct connection at the one-stop center within a reasonable time, by phone or through a real-time web-based communication, to a program staff member who can provide program information or services, including career services, to the customer. Solely providing a phone number, website, information, pamphlets, or materials does not constitute a “direct linkage.”

2) Compliance with Regulations and Guidance

In performing its responsibilities under the Governor-Secretary Agreement, as a condition for receipt of funds, the state agrees to comply with program regulations and administrative directives, including, but not limited to:

- a) Trade Adjustment Assistance Final Rule, published in the Federal Register at: <https://www.federalregister.gov/documents/2020/08/21/2020-13802/trade-adjustment-assistance-for-workers>, effective on September 21, 2020;`
- b) Joint WIOA Final Rule, as applicable, published in the Federal Register at: <https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15977.pdf>;
- c) Department-Only WIOA Final Rule, as applicable, published in the Federal Register at: <https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15975.pdf>;
- d) Full-Year Continuing Appropriations and Extensions Act, 2025 (Pub. L. 119-4);
- e) 2 CFR part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) and 2 CFR part 2900 (The Department’s Supplement to 2 CFR part 200);
- f) Chapter 2 of Title II of the Trade Act of 1974, as amended (Pub. L. 93-618) (Trade Act) (codified at 19 U.S.C. 2271 et seq.);
- g) Balanced Budget and Emergency Deficit Control Act of 1985 (BBEDCA), as amended by the Budget Control Act of 2011 (BCA);
- h) [TEGL No. 17-16](#), *Infrastructure Funding of the One-Stop Delivery System*;
- i) [TEGL No. 03-19](#), *Real Property Under Employment and Training Administration-Funded Grants*;
- j) [TEGL No. 24-20](#) and [Change 1](#): *Operating Instructions for Implementing the Reversion Provisions of the Amendments to the Trade Act of 1974 Enacted by the Trade Adjustment Assistance Reauthorization Act of 2015*;
- k) [TEGL No. 13-21](#), *Trade Adjustment Assistance (TAA) for Workers and Alternative Trade Adjustment Assistance (ATAA) and Reemployment Trade Adjustment Assistance (RTAA) Program Operations after June 30, 2022*;
- l) [TEGL No. 14-22](#), *Trade Adjustment Assistance (TAA) for Workers Program Phase-out Termination Frequently Asked Questions (FAQs)*.

TAA Program Requirements

3) Compliance with Requirements

In performing its responsibilities under this award, the state hereby certifies and assures that it will fully comply with the following requirements:

- a) Real Property. The requirements and restrictions related to real property in 2 CFR § 200.439(b)(3), provide that capital expenditures for improvements to land or buildings, which materially increase their value or useful life, are unallowable as a direct cost, except in cases where the Grant Officer has granted prior written approval. All requests for construction related expenses must come to the Secretary of Labor for prior approval.

The requirements relating to Real Property, above and explained in [TEGL No. 03-19, Real Property Under Employment and Training Administration-Funded Grants](#), apply. This guidance provides information on using ETA grant funds for capital expenditures and other real property costs, depreciation, maintaining insurance, handling idle facilities and idle facility capacity, retaining records, disposing of real property acquired with ETA grant funds; renting real property, and using and disposing of SWA real property that has DOL equity or Reed Act equity.

- b) Equipment. Equipment purchases under the TAA Program are subject to the provisions at 2 CFR § 200.313. Consistent with 20 CFR § 618.860(c)(1), the Department delegates the authority of prior approval to the Governor for equipment purchases made using TaOA funds.
- c) Oversight Roles and Responsibilities [See 20 CFR 618.860(d)(2)(i)]. Each recipient and subrecipient of funds under the Trade Act, as amended, must conduct regular oversight and monitoring of its program and those of any subrecipients and contractors as required under Trade Act sec. 239(i), and 2 CFR part 200, including 2 CFR § 200.331 through 2 CFR § 200.333, and the Department's exceptions at 2 CFR part 2900, in order to:
- i. determine that expenditures have been made against the proper cost categories and within the cost limitations specified in the Act, the regulations, and administrative guidance;
 - ii. determine whether there is compliance with other provisions of the Act, the regulations, and administrative guidance applicable to the program at issue;
 - iii. assure compliance with 2 CFR part 200 and the Department's exceptions at 2 CFR part 2900;
 - iv. assure compliance with 20 CFR part 618, if applicable; and,
 - v. determine compliance with the nondiscrimination, disability, and equal opportunity requirements of sec. 188 of WIOA, including the Assistive Technology Act of 1998 (29 U.S.C. 3003).

- d) Procedures and Resolution of Findings. [See 20 CFR § 618.860(d)(2)(ii)]

TAA Program Requirements

- i. Resolution of subrecipient-level findings.
 - (1) The Governor is responsible for resolving findings that arise from state and Federal monitoring reviews, investigations, and audits (including under 2 CFR part 200) of subrecipients awarded funds through the Trade Act, as amended.
 - (a) A state must use the written monitoring and audit resolution, debt collection and appeal procedures that it uses for other Federal grant programs.
 - (b) If a state does not have such written procedures, it must prescribe standards and procedures to be used for this grant program.
 - (2) For subrecipients awarded funds through a recipient of grant funds, the direct recipient of the grant funds must have written monitoring and resolution procedures in place that are consistent with 2 CFR part 200.
- ii. Resolution of state findings. [See 20 CFR 618.860(d)(2)(iii)]
 - (1) The Secretary is responsible for resolving findings that arise from Federal audits, monitoring reviews, investigations, incident reports, and audits under 2 CFR part 200 for direct recipients of Federal awards under the Trade Act, as amended.
 - (2) The Secretary will use the Department's audit resolution process, consistent with 2 CFR part 200, Subpart F.
 - (3) A final determination issued by a Grant Officer under this process may be appealed to the Department's Office of Administrative Law Judges under the procedures in 2 CFR § 2900.22.

e) Nondiscrimination. States must follow the requirements provided in 29 CFR part 38, Implementation of the Nondiscrimination and Equal Opportunity Provisions of WIOA.

- C. **Use of Funds**. States may use TaOA funds to provide training, job search allowances, relocation allowances, and employment and case management services to members of worker groups covered by a certification including outreach to workers under all versions of the TAA Program, in accordance with the requirements of the TAA law in effect at the time of filing of such petition for certification. This outreach should be commensurate with available TaOA funding and partner program resources. States may use TaOA funds for TAA Program related state administration, pay for the TAA Program's share of AJC infrastructure costs, and for systems development and maintenance. Please also see Section H of this Attachment for additional information.

Due to the termination status of the TAA Program, the expenditures for related state administration under the FY 2025 awards are not limited to 10 percent of the total amount of TaOA funds awarded to the state in FY 2025. State expenditures for employment and case

TAA Program Requirements

management services costs, including limited outreach activities, must not be less than 5 percent of TaOA funds awarded under the FY 2025 allocation. ETA strongly recommends that recipients spend funds with the shortest period of availability first.

- D. Deobligation of Funds.** The Recipient agrees to accept a deobligation of the TaOA funds, as set forth in the Notice of Award, in the event of underutilization of those funds. The Grantor will consider underutilization of TaOA funds to exist when the Recipient will be unable to use some or all of the unexpended and/or unobligated balance of such funds provided to the recipient, as provided in 20 CFR § 618.950. Underutilized funds will be recaptured only after notification to and consultation with the Recipient.

- E. Remedies.** All TAA Program funds must be expended in accordance with the provisions of the AFA and any special terms and conditions of approved funding requests. Any expenditure of funds that does not comply with these provisions will be subject to the enforcement remedies at 2 CFR § 200.339, and the procedures located at 2 CFR § 2900.20 through 2900.22, and, if applicable, 20 CFR § 618.804, and any succeeding regulations. The state will take such action as is reasonably necessary to recover for the account of the United States all amounts paid out as program benefits or services that were erroneously paid to ineligible claimants or others, and to restore any losses or misapplication of funds allocated to the state for TAA Program.

- F. Merit Staff.** The state agrees that staff employed to carry out state administration of the TAA Program and funded by the TAA Program, will comply with 20 CFR § 618.890.

- G. Administrative and Program Costs.** The administrative cost limit of the FY 2025 TaOA funding allocation is explained above in paragraph C of this Attachment III, with which states must comply. For purposes of the TAA Program, the costs of administration are established at 20 CFR § 618.860(b). For FY 2025 funds, the 10 percent limit on administrative expenditures does not apply.

- H. Ongoing Program Activities.** The Department is not rescinding TEGL No. 24-20; however, states should make every effort to prioritize funding for those activities supporting winddown/phaseout of TAA as there is no pending legislation to reauthorize the program.
 - 1) Outreach**
 The TAA program has been in phaseout termination status for four years. TAA Program funding is limited, and the Department is encouraging states to minimize funding for outreach and prioritize serving existing participants. For example, states could limit outreach to TAA-eligible workers who visit American Job Centers (AJCs) or to workers located through rapid response activities. Outreach activities should be charged to employment and case management services.

 - 2) Employment and Case Management**

TAA Program Requirements

States must provide workers access to employment and case management services. These services have no deadlines and there is no individual application process to receive these services. Importantly, these services may be provided by any partner program or provider – whether or not TaOA funds are used. WIOA Title I and Title III funding can also be used to provide these services.

3) Training

A trade-affected worker has a lifetime entitlement to apply for training. If the training meets the approval criteria in 20 CFR § 618.635, the state must provide the worker access to the training. The Department must make funding available to provide training to eligible workers under all versions of the TAA Program. WIOA funding under the dislocated worker or national dislocated worker grant programs is also available if the applicable criteria are met. If WIOA funds are used for training, the eligible training provider provisions apply. Should a state need additional funding, they should contact their Regional Office.

4) Trade Readjustment Allowances (TRA)

If a worker meets the eligibility criteria, TRA must be provided. To be eligible, the worker must meet all applicable deadlines and eligibility requirements. Only TRA funds may be used to pay for these benefits.

5) Alternative / Reemployment TAA (A/RTAA)

For a worker to receive A/RTAA in termination, they must have received at least one payment for their qualifying reemployment on or before June 30, 2022. Given the two-year limit on receipt of A/RTAA benefits, nearly all A/RTAA activity should have ceased. Only A/RTAA funds may be used to pay these benefits.

6) Job Search and Relocation Allowances

There are two different deadlines¹ for receipt of the job search and relocation allowances. One of these deadlines is based on completion of training. This means that there is no statutory end date to this benefit. States must continue to make participants aware of

¹*Note: **Application Deadline for Job Search Allowances:** Workers must apply for job search allowances within 365 days after the date of their certification under the TAA program or within 365 days after the date of their last total separation from employment, whichever is later. **Completion Deadline for Job Search Allowances:** The job search must be completed within 30 days after the application for job search allowances is filed. **Application Deadline for Relocation Allowances:** Workers must apply for relocation allowances within 425 days after the date of their certification under the TAA program or within 425 days after the date of their last total separation from employment, whichever is later. **Relocation Completion Deadline:** The relocation must be completed within 182 days after the application for relocation allowances is filed.*

TAA Program Requirements

these benefits, process any applications received, and make appropriate payment of these benefits.

7) Reporting and Other Administrative Responsibilities

There are no changes to the reporting requirements under the TAA Program at this time. States must still submit the Participant Individual Record Layout (PIRL), ETA-9130 Financial Reports, UI-3 Trade Reports, although the Department has paused Trade Adjustment Assistance Data Integrity (TAADI). The Department is reviewing reporting requirements and may implement a pause on the following: Efforts to Improve Outcomes, and Trade Adjustment Assistance Administrative Collection of States (TAAACS) submissions. Additional information will be forthcoming. States must continue to report information on every participant through 10 quarters after the exit quarter. ETA anticipates some states will be reporting on TAA participants into FY 2030.

8) Role as a One-Stop Partner

The TAA Program remains a required partner under WIOA and must meet its obligations under WIOA, and any memorandums of understanding implemented by the states. It is appropriate for states to review those MOUs due to decreased levels of program participation and lower funding levels. This includes determining what financial support remains appropriate for TAA with respect to American Job Center Network infrastructure and operating costs.

Submission Instructions for (TaOA) Funding via SF-424 and Grants.gov

Document submission for TAA Program TaOA funds for FY 2025 through www.grants.gov is the same procedure the Department instructed grantees to follow to apply for FY 2024 TaOA funds. On Line 18 of the SF-424, states will **enter the amount of funding requested on Attachment I of this TEGL**. The information below is provided to augment the instructions available on the www.grants.gov website and pertains to the SF-424. States must enter the exact amount of funds requested for their state on Line 18 of the SF-424 and submit this form via www.grants.gov.

In the event you encounter a problem with your submission via the www.grants.gov website and do not find a resolution in any of the other resources, call the www.grants.gov support center for assistance at 1-800-518-4726 or 1-606-545-5035, to speak to a customer support representative or email support@grants.gov. The www.grants.gov contact center is open 24 hours a day, seven days a week except for Federal holidays. *Note, the links in the sections below require Internet Explorer version IE11 or higher, Chrome, or Firefox. Please use one of these browsers to access the information available on the link.*

1. **Timely SF-424 Submissions.** To allow time to process FY 2025 TaOA grants and allocate requested funds to states, the Department strongly encourages states to submit their SF-424 TaOA via www.grants.gov as soon as possible, and no later than **twenty calendar days after the publication date of this guidance**. States are strongly advised to initiate the application submission and validation process via www.grants.gov as soon as possible and to plan for time to resolve any technical problems. Since it is the state's responsibility to ensure a timely submission of their SF-424, states are encouraged to allot time for submission (two business days) and, if applicable, additional time to address errors and receive validation upon resubmission (an additional two business days for each ensuing submission). Only applications that have been successfully submitted in www.grants.gov by the deadline, which is 20 calendar days from the issue date of this guidance, and subsequently successfully validated by www.grants.gov, will be considered timely. Please note, validation in www.grants.gov does not mean the state's application has been accepted as complete or has been accepted for review. Rather, www.grants.gov only verifies the submission of certain parts of the application.
2. **How to Submit an Application.** Applicants can apply on www.grants.gov using Workspace, <https://www.grants.gov/applicants/workspace-overview.html>. Workspace is a shared online environment that allows organizations or individuals to apply for federal grants by enabling multiple simultaneous form access and editing within a single application. To access complete instructions, see: <https://www.grants.gov/applicants/grant-applications/how-to-apply-for-grants>. To apply for FY 2025 TaOA grant funds once you have logged into Workspace, select Search Grants at: <https://www.grants.gov/search-grants>, and enter ETA-TEGL-NO-01-25 in the Opportunity Number field of the Basic Search Criteria box. Be careful to use the specific syntax: ETA-TEGL-NO-01-25.

Submission Instructions for (TaOA) Funding via SF-424 and Grants.gov

3. Important Information.

- Completing a grant application requires the state to enter the organization's Authorized Representative (AR) Username and Password. If the state does not have the AR's Username and Password, please register as a new user here: <https://apply07.grants.gov/apply/register.faces>. *Note, if the state already has a www.grants.gov account and knows or can retrieve the AR's logon information using the Forgot Username or Password function, there is no need to register another account to apply for FY 2025 TaOA grant funds.*
- When a state submits its application via www.grants.gov, an electronic time stamp is generated within the system when the application is successfully received by www.grants.gov. Grants.gov will send the applicant AOR an email acknowledgement of receipt and a tracking number, e.g., (GRANTXXXXXXXX), with the successful transmission of the application, serving as proof of their timely submission. During this process, the applicant will receive two email messages to provide the status of the application's progress through the system.
 - The first email, sent almost immediately, will contain a tracking number and will confirm receipt of the application by www.grants.gov. The second email will indicate that the application has either been successfully validated or has been rejected due to errors.
- Effective April 4, 2022, the Data Universal Numbering System (DUNS) Number was replaced by a new, non-proprietary identifier requested in and assigned by the System for Award Management (SAM) www.SAM.gov (access requires Internet Explorer version of IE11 or higher, Chrome, or Firefox). This identifier is called the Unique Entity Identifier (UEI), or the Entity ID. Each applicant must have a UEI number and must be registered with www.SAM.gov before submitting an SF-424 Form in www.grants.gov. SAM.gov is an official government website that allows applicants to: 1) register to do business with the U.S. government; 2) update or renew entity registration; 3) check the status of an entity registration; or 4) search for entity registration and exclusion records. Applicants must have an active registration in SAM to complete the SF-424. If the applicant's registration in SAM is expired, www.grants.gov will reject the application.
- The official, electronically signed SF-424 Form must reflect the state amount requested for the estimated funding total in item #18, the Catalog of Federal Domestic Assistance Number "17.245" for item #11, and the grantee's 12-character UEI listed for item #8c on the SF-424 Form.

***IMPORTANT:** Failure to correctly complete Item #15 of the SF-424 will delay the award processing. Item #15 of the SF-424 must indicate the amount of Indirect Costs claimed by the recipient, if any. States must also provide indirect cost information as a sentence in Line Item #15, Descriptive Title of Applicant's Project, on the SF-424 Form. *Example: "Indirect Costs for this award are estimated at \$19,000."* State grantees may use a federally approved Negotiated Indirect Cost Rate Agreement (NICRA) or Cost

Submission Instructions for (TaOA) Funding via SF-424 and Grants.gov

Allocation Plan (CAP) rate to calculate indirect costs against their full FY 2025 TaOA allotments, to estimate this total. States will not need to provide supporting documentation (i.e., Indirect Cost Rate Agreement or Cost Allocation Plan) to substantiate the amount of Indirect Costs estimated in Item #15. The amount a state enters for Indirect Costs will not impact the total amount entered in Item #18, Estimated Funding (\$) of the SF-424, i.e., states should enter the amount requested.

- To ensure consideration, the components of the application must be saved as .doc, .docx, .xls, .xlsx, .rtf, or .pdf files. If submitted in any other format, the applicant bears the risk that compatibility or other issues may prevent a state's application from being considered. The Department will attempt to open the document but will not take any additional measures in the event of problems with opening it (i.e., conversions of any kind).
- The Department strongly advises applicants to use the various tools and documents, including Frequently Asked Questions that are available on the "Applicant Resources" page at: <https://www.grants.gov/applicants/applicant-faqs>.
- To receive updated information about critical issues, new tips for users, and other time sensitive updates as information becomes available, subscribe to www.grants.gov updates at: <https://www.grants.gov/connect/manage-subscriptions/>.