EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210

CLASSIFICATION
INA PY 2025 Funding Allocations
CORRESPONDENCE SYMBOL
OWI-DINAP
DATE
May 22, 2025

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 12-24

TO: ALL WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

SECTION 166 INDIAN AND NATIVE AMERICAN (INA) GRANTEES

FROM: LORI FRAZIER BEARDEN

Acting Assistant Secretary

SUBJECT: Program Year 2025 Funding Allotments and Application Instructions for the

WIOA Section 166 Indian and Native American Programs Grantees

1. <u>Purpose</u>. To provide WIOA Section 166 Indian and Native American (INA) Program grantees with Comprehensive Services Program (CSP) and Supplemental Youth Services Program (SYSP) funding allotments for Program Year (PY) 2025.

2. Action Requested. Grantees must follow the requirements in this guidance to receive PY 2025 funding. Applications and all documents must be submitted through the Grants.gov website https://www.grants.gov/ within 30 days from the issue date of this Training and Employment Guidance Letter (TEGL). 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 2025 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 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 2025 grant allocation amounts;
 - 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 15, 2025, the Full-Year Continuing Appropriations and Extensions Act, 2025, was signed into law, authorizing continued FY 2025 appropriations for federal agencies and extending various expiring programs and authorities. The Act provides \$60 million for the WIOA section 166 INA CSP program. Of this amount, \$600,000 will be set-aside for compliance training 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).

RESCISSIONS	EXPIRATION DATE	
None	Continuing	

The Act also provides \$948,130,000 for PY 2025 WIOA Youth Activities. After reducing the appropriation by \$10,230,000 for set asides authorized by the Act and reserving \$925,200 for Migrant and Seasonal Farmworker (MSFW) Youth, \$936,974,800 is available for WIOA Youth activities. Of this amount, 1.5 percent is reserved for the WIOA Section 166 INA SYSP. Accordingly, \$14,054,622 is available for PY 2025 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. Details.

a. Use of Updated U.S. Census Bureau Data in PY 2024 Funding Allotments and Hold-Harmless – As required by WIOA, ETA is using the most recent U.S. Census Bureau data available 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, and pursuant to WIOA 20 CFR 684.270(c), ETA continues to implement a three-year phase-in or "hold-harmless" methodology to adjust funding allotments resulting from use of the updated population data in the funding formula. The phase-in of updated Census data will prevent drastic losses in grantee funding amounts by limiting grantee losses to five percent in PY 2024, 10 percent in PY 2025 and 20 percent in PY 2026 compared to the grantee's PY 2023 funding level. Accordingly, for PY 2025, ETA will limit grantee funding losses to 10 percent of the grantee's PY 2023 funding amount after adjusting for the change in the PY 2025 funding appropriation amount.

- **b. Submission Requirements** ETA encourages application submission as soon as possible and within 30 days from the issue date of this TEGL. Applicants must submit a separate application package when requesting CSP Adult funding and SYSP Youth funding. Grantees must submit the following forms through Grants.gov for each application type:
 - i. <u>SF-424</u>, <u>Application for Federal Assistance</u>. An electronically submitted SF-424 through Grants.gov constitutes an official signed document. The SF-424 must identify the legal name of the grantee organization, along with the organization's address, its Unique Entity Identification number (UEI) and its Employer Identification Number (EIN), all of which must match the same information listed in the organization's current registration with the System for Award Management (SAM), found at https://www.sam.gov/. Item #11 of the SF-424 must include the Assistance Listing #17.265 for Native American Employment and Training. Please review the SF-424 instructions document included on Grants.gov to ensure the correct completion of the SF-424. The total funding amount entered under the Estimated Funding section (item #18) must match the allotment amount referenced in Attachment I.
 - ii. <u>SF-424A</u>, <u>Budget Information Non-Construction Programs Form</u>. Please review the SF-424A instructions document included on Grants.gov to ensure the correct completion of the SF-424A. The total funding amount entered must match the allotment amount. See Attachment I for allotment amounts.

- iii. <u>Budget Narrative</u>. The Budget Narrative must follow the detailed instructions provided in Attachment II. Each line item/category amount on the Budget Narrative must also match the line item/category amount totals listed on the SF-424A.
- iv. Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan. Grantees that use a NICRA or Cost Allocation Plan (CAP) must submit a current copy of the NICRA or CAP as part of this application. If a new NICRA has been requested but not finalized, the grantee must include a copy of the request. Please include the letter showing the date it was submitted. Note: If a grantee includes indirect charges on line 6.j of the SF-424A, the grantee must submit a NICRA or CAP unless the grantee elects to charge a de minimis rate. If a grantee elects not to charge indirect costs, there is no need to include a NICRA or CAP.
- c. Request for an Administrative Cost Rate Above 15 Percent Administrative costs are defined in the WIOA regulations at 20 CFR 683.205(b) and 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. To request an increase to the Administrative Cost Rate, grantees must include within their Budget Narrative a narrative section that clearly makes the request and includes a description of the conditions that exist within its organizations that require an administrative cost rate above 15 percent. Such conditions may include:
 - i. The amount and nature of on-going direct and indirect administrative costs.
 - ii. 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.
 - iii. 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.)
 - iv. 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.
- **d.** Grants.gov Submission Process To submit the application package through Grants.gov, an individual with the grantee organization must be registered as an Authorized Organization Representative with Grants.gov. Follow the steps below to submit the required documents for PY 2025 funding through Grants.gov.
 - Step 1: Go to Grants.gov.
 - Step 2: Click on LOGIN in the upper right-hand corner of the screen and log in with your username and password.
 - Step 3: Once you are logged into <u>Grants.gov</u>, 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 "ETA-INAP-TEGL-12-24-IA" to submit the CSP adult application and enter "ETA-INAP-TEGL-12-24-IY" to submit the SYSP youth application. After entering the Funding Opportunity Number, 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, however, ETA recommends that the file name identifies the application as a CSP adult grant or a SYSP youth grant. For example, if you are submitting the application for the CSP adult funding, you may want to name it something like "ABC_Tribe_PY25_CSP_Adult" and if it is an application for the SYSP youth funding, you may want to name it something like "ABC_Tribe_PY25_SYSP_Youth".
- Step 5: Click on the links in the Application Package Forms and complete all required forms.
- **5. Inquiries.** Please direct questions to your Federal Project Officer.

6. References.

- Full-Year Continuing Appropriations and Extensions Act, 2025 (Public Law 119-4, March 15, 2025) available at: https://www.congress.gov/bill/119th-congress/house-bill/1968
- Section 166 of the WIOA (29 U.S.C. 3221): 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: https://www.ecfr.gov/current/title-20/chapter-V/part-684
- TEGL 05–24, October 8, 2024, Implementation of the 2024 Revisions to the Office of Management and Budget (OMB) *Guidance for Federal Financial Assistance* available at: TEGL 05-24 | U.S. Department of Labor
- **7.** Attachment I: PY 2025 INA Program Adult and Youth Funding Allocations Attachment II: Funding Restrictions and Budget Narrative Instructions

		Total Adult and Youth Appropriation Amount	\$60,000,000	\$14,054,622
		Less 1% for Compliance Training	\$600,000	\$0
		Total Adult and Youth Allocations	\$59,400,000	\$14,054,622
Type	State	Grantee Name	Adult	Youth
	AL	Inter-Tribal Council of Alabama	\$290,444	\$5,166
	AL	Poarch Band of Creek Indians	\$90,865	\$0
477	AK	Aleutian-Pribilof Islands Association	\$29,103	\$12,299
477	AK	Association of Village Council Presidents	\$560,191	\$248,311
477	AK	Bristol Bay Native Association	\$113,820	\$44,072
477	AK	Central Council of Tlingit and Haida Indian Tribes	\$209,665	\$71,680
477	AK	Chugachmiut	\$26,827	\$15,040
477	AK	Cook Inlet Tribal Council, Inc	\$426,950	\$136,879
477	AK	Copper River Native Association	\$18,024	\$8,570
477	AK	Kawerak Incorporated	\$188,399	\$81,606
477	AK	Kenaitze Indian Tribe	\$54,820	\$22,876
477	AK	Knik Tribe	\$51,199	\$23,029
477	AK	Kodiak Area Native Association	\$40,001	\$13,754
477	AK	Maniilaq Association	\$155,089	\$71,592
477	AK	Metlakatla Indian Community	\$22,878	\$7,158
477	AK	Orutsararmuit Native Council	\$63,176	\$22,629
477	AK	Tanana Chiefs Conference	\$278,952	\$104,059
	AZ	American Indian Association of Tucson	\$592,162	\$0
	AZ	Colorado River Indian Tribes	\$76,636	\$54,360
	AZ	Gila River Indian Community	\$628,963	\$221,315
	AZ	Hopi Tribal Council	\$227,150	\$115,609
477	AZ	Hualapai Tribe	\$38,150	\$18,363
	AZ	Inter Tribal Council of Arizona, Inc.	\$100,639	\$45,238
	AZ	Navajo Nation	\$5,998,062	\$2,808,366
477	AZ	Pascua Yaqui Tribe	\$113,393	\$66,502
	AZ	Phoenix Indian Center, Inc.	\$1,820,717	\$0
	AZ	Quechan Indian Tribe	\$33,060	\$21,167
	AZ	Salt River Pima-Maricopa Indian Community	\$130,906	\$52,393
	AZ	San Carlos Apache Community College	\$384,193	\$203,221
477	AZ	Tohono O'Odham Nation	\$401,973	\$232,290
	AZ	White Mountain Apache Tribe	\$554,874	\$243,620
	AR	American Indian Center of Arkansas, Inc.	\$356,341	\$0
	CA	California Indian Manpower Consortium, Inc.	\$3,278,121	\$129,053
	CA	Native American Health Center, Inc.	\$484,814	\$0
	CA	Northern California Indian Development Council, Inc.	\$624,560	\$69,420
	CA	Southern California American Indian Resource Center, Inc.	\$708,050	\$0
	CA	Tule River Tribal Council	\$139,153	\$16,227
	CA	United American Indian Involvement	\$1,616,307	\$0

	СО	Denver Indian Center Inc.	\$800,162	\$0
	CO	Ute Mountain Ute Tribe	\$84,922	\$20,812
	FL	Florida Governor's Council on Indian Affairs, Inc.	\$1,348,533	\$0
	FL	Miccosukee Tribe of Indians	\$208,320	\$14,936
	HI	Alu Like, Inc.	\$1,295,152	\$1,834,495
477	ID	Nez Perce Tribe	\$80,779	\$25,150
477	ID	Shoshone-Bannock Tribes, Inc	\$194,221	\$52,642
	KS	United Tribes of Kansas and Southeast Nebraska, Inc.	\$252,433	\$10,735
	LA	Inter-Tribal Council of Louisiana, Inc.	\$508,409	\$3,673
	ME	Penobscot Indian Nation	\$210,283	\$23,015
477	MA	Mashpee-Wampanoag Indian Tribal Council, Inc.	\$56,745	\$0
477	MI	Grand Traverse Band of Ottawa & Chippewa Indians	\$35,043	\$5,411
	MI	Inter-Tribal Council of Michigan, Inc.	\$95,245	\$39,367
	MI	Little Traverse Bay Band of Odawa Indians	\$134,340	\$0
	MI	Michigan Indian Employment and Training Services, Inc.	\$335,133	\$0
	MI	North American Indian Association of Detroit, Inc.	\$152,327	\$0
	MI	Sault Ste. Marie Tribe of Chippewa Indians	\$179,422	\$27,556
	MI	Southeastern Michigan Indians. Inc.	\$84,215	\$0
	MN	American Indian Opportunities, Inc.	\$251,724	\$0
477	MN	Bois Forte Reservation Tribal Council	\$30,099	\$8,363
	MN	Fond Du Lac Reservation	\$193,987	\$27,139
	MN	Leech Lake Band of Ojibwe	\$43,789	\$56,003
477	MN	Mille Lacs Band of Ojibwe Indians	\$55,652	\$21,791
	MN	Minneapolis American Indian Center	\$373,821	\$0
	MN	Northwest Indian OIC	\$131,068	\$0
477	MN	Red Lake Nation	\$259,169	\$90,263
477	MN	White Earth Reservation Tribal Council	\$137,759	\$56,083
	MS	Mississippi Band of Choctaw Indians	\$337,439	\$95,987
	MO	American Indian Council	\$767,511	\$8,570
477	MT	Assiniboine and Sioux Tribes	\$258,284	\$126,095
477	MT	Blackfeet Tribal Business Council	\$284,232	\$127,170
477	MT	Business Committee of the Chippewa Cree Tribe	\$143,894	\$56,733
477	MT	Confederated Salish & Kootenai Tribes	\$284,102	\$127,319
477	MT	Fort Belknap Community Council	\$136,538	\$53,259
	MT	Little Big Horn College	\$164,156	\$80,554
	MT	Montana United Indian Association	\$324,419	\$0
	MT	Northern Cheyenne Tribe	\$205,548	\$90,592
	NE	Omaha Tribe of Nebraska	\$85,852	\$42,848
	NE	Ponca Tribe of Nebraska	\$270,183	\$0
477	NE	Winnebago Tribe of Nebraska	\$55,254	\$21,892
	NV	Inter-Tribal Council of Nevada	\$414,647	\$64,755
	NV	Las Vegas Indian Center, Inc.	\$326,655	\$0
477	NV	Reno Sparks Indian Colony	\$26,981	\$9,564
477	NV	Shoshone-Paiute Tribes	\$139,050	\$13,466
	NM	Alamo Navajo School Board, Inc.	\$84,294	\$45,296
	NM	Eight Northern Indian Pueblo Council	\$69,398	\$30,522

	NM	Five Sandoval Indian Pueblos, Inc.	\$166,022	\$85,451
	NM	Jicarilla Apache Tribe	\$69,935	\$29,991
	NM	Mescalero Apache Tribe	\$101,454	\$58,051
	NM	National Indian Youth Council	\$1,932,016	\$0
477	NM	Ohkay Owingeh	\$29,661	\$14,426
	NM	Pueblo of Acoma	\$154,318	\$28,157
	NM	Pueblo of Isleta	\$62,729	\$30,803
477	NM	Pueblo of Laguna	\$96,708	\$34,278
477	NM	Pueblo of Taos	\$38,510	\$17,139
477	NM	Pueblo of Zuni	\$304,315	\$127,170
	NM	Ramah Navajo School Board, Inc.	\$119,415	\$30,747
	NM	Santo Domingo Tribe	\$94,744	\$42,554
		Native American Community Services of Erie & Niagara Counties,		
	NY	Inc.	\$347,197	\$10,161
477	NY	Seneca Nation of Indians	\$225,051	\$49,592
477	NY	St. Regis Mohawk Tribe	\$131,548	\$35,983
477	NC	Eastern Band of Cherokee Indians	\$110,193	\$58,051
	NC	Guilford Native American Association	\$105,552	\$0
	NC	Lumbee Regional Development Association, Inc.	\$1,450,519	\$0
	NC	North Carolina Commission of Indian Affairs	\$834,737	\$0
477	ND	Spirit Lake Sioux Tribe	\$169,969	\$77,521
477	ND	Standing Rock Sioux Tribe	\$260,664	\$128,773
477	ND	Three Affiliated Tribes	\$178,610	\$51,417
	ND	Turtle Mountain Band of Chippewa Indians	\$291,167	\$117,525
	ND	United Tribes Technical College	\$288,426	\$0
	OH	North American Indian Cultural Center, Inc.	\$544,474	\$0
477	OK	Absentee Shawnee Tribe	\$26,201	\$15,036
477	OK	Cherokee Nation of Oklahoma	\$1,488,672	\$797,192
477	OK	Cheyenne Arapaho Tribes of Oklahoma	\$153,646	\$95,489
477	OK	Chickasaw Nation	\$351,228	\$185,837
477	OK	Choctaw Nation of Oklahoma	\$564,146	\$274,756
477	OK	Citizen Potawatomi Nation	\$490,369	\$365,267
	OK	Comanche Tribe of Oklahoma	\$150,049	\$66,108
477	OK	Creek Nation of Oklahoma	\$858,162	\$427,429
	OK	Inter-Tribal Council of Northeast Oklahoma	\$84,538	\$34,889
	OK	Kiowa Tribe of Oklahoma	\$233,290	\$144,703
477	OK	Osage Nation	\$95,214	\$47,745
	OK	Otoe-Missouria Tribe	\$32,139	\$15,425
477	OK	Pawnee Nation of Oklahoma	\$30,617	\$19,033
	OK	Ponca Tribe of Oklahoma	\$80,253	\$51,173
	OK	Tonkawa Tribe of Oklahoma	\$61,256	\$25,709
	OK	United Urban Indian Council, Inc.	\$357,407	\$182,409
477	OK	Wyandotte Nation	\$106,919	\$0
477	OR	Confed. Tribes of the Umatilla Indian Reservation	\$30,654	\$13,466
477	OR	Confederated Tribes of Siletz Indians	\$512,227	\$5,940
	OR	Confederated Tribes of Warm Springs	\$154,369	\$56,266
	PA	Council of Three Rivers American Indian Center, Inc.	\$1,315,575	\$0

	RI	Rhode Island Indian Council, Inc.	\$1,995,714	\$8,325
	SC	South Carolina Indian Development Council, Inc.	\$309,501	\$4,446
477	SD	Cheyenne River Sioux Tribe	\$258,052	\$129,768
	SD	Lower Brule Sioux Tribe	\$55,440	\$27,925
	SD	Oglala Sioux Tribe	\$658,387	\$406,846
477	SD	Rosebud Sioux Tribe (Sicangu Nation)	\$1,308,218	\$284,160
477	SD	Sisseton-Wahpeton Oyate	\$154,581	\$65,440
	SD	Yankton Sioux Tribe	\$108,856	\$57,704
	TN	Native American Indian Association, Inc.	\$276,026	\$0
	TX	Alabama-Coushatta Indian Tribal Council	\$886,977	\$2,327
	TX	Dallas Inter-Tribal Center	\$457,981	\$0
	TX	Ysleta del Sur Pueblo	\$718,847	\$28,536
	UT	Indian Training & Education Center	\$429,702	\$5,387
	UT	Ute Indian Tribe	\$116,790	\$59,772
	WA	American Indian Community Center	\$455,989	\$24,394
	WA	Confederated Tribes & Bands of the Yakama Nation	\$231,689	\$111,182
477	WA	Confederated Tribes of the Colville Reservation	\$180,522	\$45,296
477	WA	Lummi Indian Business Council	\$121,273	\$24,484
477	WA	Makah Tribal Council	\$35,504	\$12,242
477	WA	South Puget Intertribal Planning Agency	\$622,995	\$91,995
477	WA	Spokane Reservation	\$43,508	\$22,036
477	WA	Suquamish Indian Tribe	\$145,495	\$2,448
477	WA	The Tulalip Tribes	\$43,784	\$19,588
	WA	United Indians of All Tribes Foundation	\$281,971	\$0
477	WI	Ho-Chunk Nation	\$175,039	\$8,956
	WI	Lac Courte Oreilles Tribal Governing Board	\$220,753	\$58,788
	WI	Lac Du Flambeau Band of Lake Superior Chippewa Indians, Inc.	\$58,434	\$21,812
477	WI	Menominee Indian Tribe of Wisconsin	\$99,770	\$45,296
	WI	Oneida Tribe of Indians of Wisconsin	\$205,394	\$25,952
	WI	Spotted Eagle, Inc.	\$214,826	\$0
477	WI	Stockbridge-Munsee Community	\$58,262	\$3,428
477	WY	Eastern Shoshone Tribe	\$127,777	\$32,809
477	WY	Northern Arapaho Business Council	\$217,262	\$73,698
71		Total Grantees = 163	\$59,400,000	\$14,054,622

U. S. Department of Labor Employment and Training Administration (ETA) WIOA Title I, Sec. 166 Indian and Native American Program Applicable Funding Restrictions and Budget Narrative Instructions

Funding Restriction: Administrative Cost Limitation

Request for an Administrative Cost Rate Above 15 Percent. – Administrative costs are defined in the Workforce Innovation and Opportunity Act regulations at 20 CFR 683.205(b) and 20 CFR 683.215. The grant terms and conditions limit administrative costs for WIOA Indian and Native American Program (INAP) 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 the justification in a separate section within their Budget Narrative, describing the conditions that exist within its organization that require an administrative cost rate above 15 percent. Such conditions may include:

- i. The amount and nature of on-going direct and indirect administrative costs.
- ii. 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.
- iii. 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.)
- iv. 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.

Requirements for Explaining the SF-424A Line-Item Categories in the Budget Narrative (reflective of Uniform Guidance revisions effective October 1, 2024):

- **Personnel:** List all staff positions by title (including individuals hired by an employment contract) including the roles and responsibilities. For each position give the annual salary, the percentage of time devoted to the project, and the amount of each position's salary funded by the grant.
- **Fringe Benefits:** Provide a breakdown of the amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement, etc.

- **Travel:** For grantee staff only, specify the purpose, number of staff traveling, mileage, per diem, estimated number of in-state and out-of-state trips, and other estimated costs for each type of travel.
- Equipment: Identify each item of equipment you expect to purchase that has an estimated acquisition cost of \$10,000 or more per unit (or if your capitalization level is less than \$10,000, use your capitalization level) and a useful lifetime of more than one year (see 2 CFR 200.1 for the definition of Equipment). List the item, quantity, and the unit cost per item. Items with a unit cost of less than \$10,000 are supplies, not "equipment." In general, we do not permit the purchase of equipment during the last funded year of the grant.
- **Supplies:** Identify the cost of supplies (e.g., general office supplies, desk/chairs, laptops/printers, other specialty items) in the detailed budget per category. Except for general office supplies, list the item, quantity, and the unit cost per item. Supplies include all tangible personal property other than "equipment" (see 2 CFR 200.1 for the definition of Supplies).
- Contractual: Under the Contractual line item, delineate contracts and subawards separately. Contracts are defined according to 2 CFR 200.1 as a legal instrument by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award. A subaward, defined by 2 CFR 200.1 means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. This should include payments to a contractor for third-party evaluations that are not already accounted for elsewhere, if applicable. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. For each proposed contract and subaward, specify the purpose and activities to be provided, and the estimated cost.
- Construction: Construction costs are not allowed, and this line must be left as zero. Minor alterations to adjust an existing space for grant activities (such as a classroom alteration) may be allowable. We do not consider this as construction, and you must show the costs on other appropriate lines such as Contractual.
- Other: Provide clear and specific detail, including costs, for each item so that we can determine whether the costs are necessary, reasonable, and allocable. List items, such as stipends or incentives, not covered elsewhere.
- **Indirect Costs:** If you include an amount for indirect costs (through a Negotiated Indirect Cost Rate Agreement or De Minimis) on the SF-424A budget form, then include one of the following:
 - a. If you have a Negotiated Indirect Cost Rate Agreement (NICRA), provide an explanation of how the indirect costs are calculated. This explanation should include

which portion of each line item, along with the associated costs, are included in your cost allocation base. Also, provide a current version of the NICRA; or

b. If you intend to claim indirect costs using the 15 percent de minimis rate of modified total direct costs (MTDC), please confirm that your organization meets the requirements as described in 2 CFR 200.414(f). Clearly state that your organization does not have a current negotiated (including provisional) rate, and is not one described in 2 CFR Part 200, Appendix VII(D)(1)(b).

Applicants choosing to claim indirect costs using the de minimis rate must use MTDC as their cost allocation base. Provide an explanation of which portion of each line item, along with the associated costs, are included in your cost allocation base. Note that there are various items not included in the calculation of MTDC. See the definition below to assist you in your calculation.

• Modified Total Direct Cost (MTDC) Definition: To avoid a serious inequity in the distribution of indirect costs, DOL defines MTDC as all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 of each subaward or subcontract (regardless of the period of performance of the subawards and subcontracts under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward or subcontract in excess of \$50,000.

Please note participant support costs are not included in modified total direct costs. As defined under 2 CFR 200.1, Participant Support Cost means direct costs that support participants and their involvement in a Federal award, such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid directly to or on behalf of participants.

Additionally, the following link contains information regarding the negotiation of Indirect Cost Rates at DOL: https://www.dol.gov/agencies/oasam/centers-offices/office-of-the-senior-procurement-executive/cost-price-determination-division.

Indirect-type costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs; these types of costs are recovered as part of charging the de minimis or NICRA rate. Do not show leveraged resources on the SF-424 and SF-424A. You should describe leveraged resources in the Budget Narrative.

Applicants must list the same requested federal grant amount on the SF-424, SF-424A, and Budget Narrative.