U.S. DEPARTMENT OF LABOR

Bureau of International Labor Affairs

Program Office:
Office of Child Labor, Forced Labor, and Human Trafficking

Notice of Availability of Funds and Funding Opportunity Announcement for: Freedom Shield: Global Forced Labor Import Prohibition Initiative

Announcement Type: Discretionary Cooperative Agreement

Funding Opportunity Number: FOA-ILAB-26-44

Assistance Listing Number: 17.401

Key Dates: The closing date for receipt of applications under this announcement is September 21, 2026. Applications must be received no later than 11:59 p.m. Eastern Time.

All technical questions related to the content of this Funding Opportunity Announcement (FOA) must be submitted no later than 10 business days prior to the close date of the FOA.

Award decisions are expected to be made between September 30, 2026 and December 31, 2026.

The Department will make its best efforts to make award decisions within this timeframe, but please be aware that there are a variety of circumstances that may result in a later or earlier than expected award decision.

To apply: Submit applications via https://www.grants.gov/ in response to this funding opportunity number.

Please refer to Section IV for application submission instructions.

EXECUTIVE SUMMARY

The Bureau of International Labor Affairs (ILAB), U.S. Department of Labor (USDOL, or the Department), announces the availability of approximately $18 million total costs (subject to the availability of Federal funds) for two (2) cooperative agreements to fund projects that will strengthen accountability in key trade partner countries to implement and enforce prohibitions on imports made wholly or in part with forced labor. These projects will also leverage labor commitments in trade agreements, including Agreements on Reciprocal Trade (ARTs), to address gaps in forced labor enforcement that create unfair competition against American workers and producers.

Up to $11 million will be awarded for a project in Latin America that must provide activities in four countries: Argentina, Ecuador, El Salvador, and Guatemala. The U.S. Department of Labor reserves the right to designate additional Latin American countries in which the selected applicant will be required to provide activities in the project. Up to $7 million will be awarded for a project in Asia that must provide activities in two countries: Bangladesh and Malaysia. The U.S. Department of Labor reserves the right to designate additional Asian countries in which the selected applicant will be required to provide activities in the project. Applicants will propose the allocation of budget for each designated country in the regional project to which they are applying with the understanding that the budgets may require modifications to reallocate award funds among additional countries if so designated by USDOL.

The duration of the project will be 36 months from the award date. Applicants may propose a shorter period of performance in line with their proposed strategy. Proposed activities focused on adoption of forced labor import prohibitions should be of a shorter duration, focusing on adoption of measures as soon as feasible.

Applicants must ensure that their proposed activities and geographic focus align with all requirements of the FOA (e.g., country limitations, sectors, thematic areas, etc.) and respond directly to the programmatic intent described in Section I. Successful awardees must ensure that their activities align and comply with all relevant policies, Executive Orders, and strategies of the federal government for the life of the project regarding objectives, outcomes, monitoring and evaluation, fiscal transparency, and operational governance. Failure to align and comply risks termination of the project.

Applicants may apply for one or both cooperative agreements. If applicants choose to apply for both geographic regions, they must submit separate applications for each, and each application will be evaluated independently. Eligible applicants include any commercial, international, educational, or non-profit organizations, including any faith-based organizations, community-based organizations, or public international organizations (PIOs). Please see section III of this funding opportunity announcement for complete eligibility requirements.

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I. FUNDING OPPORTUNITY DESCRIPTION

A. PROGRAM PURPOSE

The Bureau of International Labor Affairs (ILAB) increases American job and wage growth by combatting foreign labor abuses and unfair trade practices in global supply chains that undermine U.S. prosperity and security. ILAB works to ensure that U.S. workers and businesses benefit from the Administration's trade and labor policies by countering overseas labor practices that impede fair competition, including through the robust enforcement of labor provisions in trade agreements.

See ILAB's webpage for additional information: https://www.dol.gov/agencies/ilab.

In addition to the standard risk review of all applicants, ILAB will incorporate Transparency Tiers and Financial Health Key Performance Indicators (KPIs) to identify implementing partners that demonstrate strong fiscal stewardship, operational efficiency, and low administrative burden. These factors support federal assistance requirements in accordance with 2 C.F.R. 200.

This FOA solicits applications to implement 2 cooperative agreements with the objective of advancing U.S. trade priorities by building accountability in key trade partner countries to implement and effectively enforce a prohibition on imports made wholly or in part with forced labor. These projects will leverage labor commitments in trade agreements, including Agreements on Reciprocal Trade (ARTs), to address gaps in forced labor enforcement that create unfair competition for American workers and producers.

Up to $11 million will be awarded for a project in Latin America that must provide activities in four countries: Argentina, Ecuador, El Salvador, and Guatemala. The U.S. Department of Labor reserves the right to designate additional Latin American countries in which the selected applicant will be required to provide activities in the project. Up to $7 million will be awarded for a project in Asia that must provide activities in two countries: Bangladesh and Malaysia. The U.S. Department of Labor reserves the right to designate additional Asian countries in which the selected applicant will be required to provide activities in the project. Applicants will propose the allocation of budget for each designated country in the regional project to which they are applying with the understanding that the budgets may require modifications to reallocate award funds among additional countries if so designated by USDOL.

The projects will:

- guide trade partner countries to develop and enforce robust legal, regulatory, and policy frameworks that align with international labor standards and trade compliance obligations;
- build institutional capacity within customs, trade, and labor enforcement agencies to identify, monitor, and restrict the entry of forced labor–produced goods at ports of entry;
- ensure trade communities, businesses, and the broader public are informed, prepared, and engaged in efforts to eliminate forced labor from the global trading system; and
- create durable mechanisms for accountability and transparency in supply chains that can be replicated in other countries.

Possible project deliverables include 1) training tools and standard-operating procedures for foreign customs officials to identify and stop goods produced by forced labor, including forced child labor; and 2) establishment of coordinating mechanisms and working to monitor the enforcement of the prohibition of imported goods made with forced labor.

B. PROGRAM AUTHORITY

ILAB is authorized to award and administer grants and cooperative agreements by the Consolidated Appropriations Act, 2026, Pub. L. 119-75 (February 3, 2026).

C. BACKGROUND INFORMATION

Forced labor is an egregious violation of human dignity and poses economic and security risk to the United States.[1] Globally, an estimated 28 million adults and children are subjected to forced labor, generating approximately $236 billion annually in illegal profits and contaminating global supply chains with labor exploitation.[2] Unethical employers, recruiters, and in some cases, government authorities use coercion, threats, and penalties to compel individuals to work under terms that amount to modern slavery.[3] When goods produced with forced labor and forced and indentured child labor move freely across international borders, their artificially low prices distort markets, weaken U.S. supply chain security, and erode U.S. jobs and wages.[4]

The United States prohibits the importation of goods made with forced labor, including forced or indentured child labor, and actively enforces this prohibition through a range of legal, regulatory, and investigative tools.[5] While these efforts prevent forced labor-tainted goods from entering the U.S. market, ultimately the eradication of forced labor globally will require concerted action by other countries to ensure that such goods cannot find safe harbor elsewhere.

Through Agreements on Reciprocal Trade (ARTs), partner countries identified for this project (Argentina, Bangladesh, Ecuador, El Salvador, Guatemala, Malaysia) have committed to prohibiting the importation of goods made with forced labor. To implement these commitments effectively, these countries must strengthen legal and regulatory frameworks, establish procedures for risk assessment and investigations, and build institutional capacity for enforcement. They must also adopt rigorous systems and acquire technical expertise to deploy best practices in implementation and address common challenges, including divergent legal standards, inconsistent evidentiary requirements, and weak enforcement that creates the appearance of action without delivering real results. In addition, partner countries will need to engage importers, employers, and workers on the risks and consequences of trade in forced labor-produced goods and how to address forced labor in their supply chains. This will help ensure that enforcement agencies receive probative information to enforce the forced labor import prohibition and prevent the production and circulation of such goods in international markets.

II. AWARD INFORMATION

A. AWARD TYPE AND AMOUNT

Funding will be provided in the form of a cooperative agreement. Approximately $18 million total costs are expected to be available to fund approximately two (2) awards. Applicants may apply for a ceiling amount of up to $11 million for implementation in Latin American countries (Argentina, Ecuador, El Salvador, Guatemala) and up to $7 million for implementation in Asian countries (Bangladesh, Malaysia). Awards made under this announcement are subject to the availability of federal funds. In the event that additional funds become available, USDOL reserves the right to increase the amount of an award or to use such funds to select additional recipients from applications submitted in response to this announcement.

In addition to its normal consultative role as grantor, ILAB's substantial involvement in program activities may focus on elements that are essential to meet program requirements and ensure achievement of program objectives and outcomes. ILAB's involvement may include, but not be limited to:

- Liaising with in-country USG officials and host country governments on matters related to the project.
- Collaborating substantially on the project strategy and implementation, as well as the development of the project document package.
- Collaborating substantially on project monitoring activities, including but not limited to, work plans, progress reports, evaluations, attestation engagements, site visits, conference calls.
- Collaborating substantially on the development and implementation of the monitoring and evaluation plan and all of its components consistent with applicable federal law, regulations, and policies.
- Providing highly specialized input on the design and implementation of activities related to strengthening international labor standards, labor justice institutions, and legal and policy frameworks, among others.
- Being substantially and actively involved in designing research, service provision, and/or capacity building activities jointly with the recipient.
- Reviewing and providing input on project's planning and collaborating to promote the continuation of project outcomes and benefits, including through replication of good practices.

- Providing guidance to ensure alignment with all relevant U.S. Presidential Executive Orders, policy memoranda, and other applicable government directives throughout the project's lifecycle.

B. PERIOD OF PERFORMANCE

The required period of performance is 36 months from the award date. This performance period includes all necessary implementation and start-up activities. Only allowable costs incurred during the period of performance may be charged to the federal award (2 C.F.R. 200.1 Period of Performance). Applicants may propose a shorter period of performance in line with their proposed strategy.

III. ELIGIBILITY INFORMATION

A. ELIGIBLE APPLICANTS

The following organizations are eligible to apply:

- U.S. organizations:
    - Nonprofits, including any faith-based organizations or community-based organizations
    - Public/State Controlled Institutions of Higher Education
    - Private Institutions of Higher Education
    - Native American tribal organizations (Federally recognized)
    - For-Profit organizations

- Non-U.S. organizations:
    - Non-U.S. Entities, including PIOs, as described in 2 C.F.R. 200.1.

Applicants selected for award, including PIOs, must abide by DOL's requirements in the term and conditions of the award, in alignment with U.S. appropriation laws and applicable U.S. regulations.

Applicants do not need previous experience managing federal awards, but they must speak persuasively about their ability to leverage other previous experience and bring it to scale in support of a large federal investment.

Faith-based organizations are encouraged to apply, as are all organizations. Those that meet the eligibility requirements may receive awards under this funding opportunity. DOL will not, in the selection of recipients and administration of the grant, discriminate on the basis of an organization's religious character, affiliation, exercise, or lack thereof, or on the basis of conduct that would not be considered grounds to favor or disfavor a similarly situated secular organization.

The following types of organizations **are not** eligible to apply nor to participate as subrecipients/contractors:

- Organizations designated by the U.S. Government to be associated with terrorism.
- Organizations designated by the U.S. Government to have been debarred or suspended.

- Organizations planning to charge a fee (profit) associated with a project funded by a USDOL award.
- Foreign governments and entities that are agencies of, or operated by or for, a foreign state or government are not eligible to apply. However, they may be eligible to participate as a subrecipient in certain instances, subject to USDOL approval. NOTE: If an exception to this subrecipient eligibility criterion might be appropriate, the application must include a detailed justification for the possible exception. **USDOL funds are not intended to duplicate existing foreign government efforts or substitute for activities for which such governments have already assumed responsibility.** USDOL will make eligibility decisions on a case-by-case basis after receiving the application.

B. COST SHARING OR MATCHING

This program does not require cost sharing or matching funds. Including such funds is not one of the application screening criteria, unless otherwise specified in the proposal requirements. Absent such a requirement, applications that include any form of cost sharing or match will not receive additional consideration during the review process. Instead, the agency considers any resources contributed to the project beyond the funds provided by the agency as leveraged resources. Section IV.B.2 provides more information on leveraged resources.

C. OTHER INFORMATION

1. Application Screening Criteria

Use the following checklist as a guide when preparing the application package to ensure that the application has met all of the screening criteria. Note that this checklist is only an aid for applicants and should <u>not</u> be included in the application package. It is recommended to use this checklist to ensure that the application contains all required items. If the application does not substantially meet all of the screening criteria, the application will not move forward to the merit review process.

Application Requirement	Instructions	Complete?
The deadline submission requirements are met	Section IV.B.3.a	
Eligibility requirements are met	Section III.A	
The components of the application are saved in any of the specified formats and are not corrupt. (USDOL will attempt to open documents but will not troubleshoot any problems related to opening files.)	Section IV.B.3.b	
Applicant has registered with the System for Award Management (SAM) and maintains an active account	Section IV.B.2.a	
Completed and signed SF-424, Application for Federal Assistance, including a Unique Entity Identifier Number	Section IV.B.2.c	
Funding request on SF-424 does not exceed the ceiling amount of $11M or $7M total costs, as applicable.	Section II.A	
SF-424A, Budget Information Form	Section IV.B.2.d	
Technical Proposal • Project Design • Project Milestones and Targets • M&E Statement • Work Plan • Organizational Capacity	Section IV.B.1	
Cost Proposal	Section IV.B.2	
SF-424A Budget Narrative	Section IV.B.2	
Budget Narrative for each country operation	Section IV.B.2	

2. Number of Applications to be Submitted

Applicants may apply to just one or each of the Latin America and Asia cooperative agreements; however, multiple applications from an organization for either the Latin America or the Asia cooperative agreement are not allowed. If applicants choose to apply for both geographic regions, they must submit separate applications for each, and each application will be evaluated independently. If multiple applications to the same cooperative agreement are received, the most recent application submitted by the deadline will be accepted. If the most recent application is disqualified for any reason, USDOL will not replace it with an earlier application. Applicant entities are not precluded from participating as partners on another entity's application.

IV. APPLICATION AND SUBMISSION INFORMATION

A. HOW TO OBTAIN AN APPLICATION PACKAGE

This FOA, found at www.grants.gov, contains all of the information needed to apply for funding. Applicants should note that it includes hyperlinks to external forms and resources. Applicants are required to comply with all parts of the FOA, including those parts found at the hyperlinks.

B. CONTENT AND FORM OF APPLICATION SUBMISSION

Applications submitted in response to this FOA must consist of two separate and distinct parts: (1) a Technical Proposal, including attachments; and (2) a Cost Proposal, including the SF-424 Application for Federal Assistance and related forms identified as follows. It is the applicant's responsibility to ensure that the funding amount requested is consistent across all parts of the application. If the funding amount is not consistent, the amount requested on the SF-424 will be considered for the purpose of the award. Applicants who use or plan to use AI platforms (e.g., Copilot, ChatGPT, Gemini, etc.) to develop their applications and/or implement project activities may do so, and are required to provide information about this in their proposals.

1. Technical Proposal

Applicants are required to complete all elements of the application package, including the various components of the technical narrative, budget documentation and justification, other narrative materials, and all forms, certifications, and attachments stated as necessary for submission. Applicants must ensure that every element is included according to FOA specifications to avoid disqualification. This includes every section within the categories of the project design, milestones & targets, monitoring and evaluation (M&E), work plan, organizational capacity, key personnel, management plan, budget narrative and budget line-itemization. Failure to include all these elements will render an application package incomplete.

Applicants should use their technical expertise to propose how to meet the requirements of the FOA and must provide justification for their choices based on evidence (see definition in Appendix B), analysis of contextual opportunities and constraints, and available resources within the requirements of the FOA. Applicants must include specific citations to the evidence used to support their proposed project strategy. If there is limited evidence to support the proposed intervention(s), applicants may propose to pilot an innovative approach but must include and describe a plan for monitoring and assessing the effectiveness of the intervention(s).

All pages of the application must be numbered. All required documents (including attachments) must be submitted in English. Any additional documentation submitted that is not required or specifically requested under this announcement will not be considered during the merit review process.

Technical Proposals must be no more than 50, double-spaced pages (8.5 x 11 inches with 1-inch margins). If any page limits required by this FOA for any part of the application are exceeded, the content that exceeds the page limit will not be considered during the merit review process. Font style must be Times New Roman and font size must be 12-point. The Cover Page, Acronyms List, Table of Contents, required attachments to the Technical Proposal, and the Cost Proposal do not count toward the page limit and do not have any spacing restrictions. Different fonts and font sizes may be used for tables, text boxes, and graphics. However, it is the applicant's responsibility to ensure that they are legible and meet electronic submission requirements. Documents which cannot be read or accessed by the Department will not be considered during the merit review process. Please see section IV.B.3. for the file format requirements for electronic submissions.

The following instructions provide all the information needed to complete the Technical Proposal. Applicants should carefully read and consider each section and include all required information. The Technical Proposal will be evaluated using the evaluation criteria identified in Section V, Application Review Information. Applicants must use the same section headers identified in this FOA for each section of the Technical Proposal:

a. Abstract (Executive Summary)

Applicants must submit as an attachment an abstract summarizing the proposed project including, but not limited to, the project objective, proposed outcomes, sub-outcomes (if included in this FOA), outputs, and activities. The abstract must describe the proposed project in plain language, including the information listed below. Omission of this attachment will result in the disqualification of an application, and it will not proceed to merit panel review.

1) Applicant's Name and Title for the Project. The applicant's name and title for the proposed project.
2) Purpose. A brief description of the purpose for the award, including a description of the geographic area to be served (if applicable), population(s) to be served (if applicable), number and description of individuals, groups and institutions to be served (if applicable), and the funding level requested.
3) Activities to be Performed. A brief description of award-specific activities and other deliverables.
4) Expected Outcomes. The project objective, proposed outcomes, and outputs.
5) Intended Beneficiaries. Intended beneficiary(ies) or recipient(s) of the project activities.
6) Subrecipient Activities. If sub-awards are proposed, then specify the activities to be provided and the name of each proposed sub-awardee, if known.

The abstract is limited to two double-spaced single sided 8.5 x 11-inch pages with 12-point text font, Times New Roman font style, and 1-inch margins. When submitting in Grants.gov, this document must be uploaded as an attachment to the application package and specifically labeled "Abstract." The information provided in the abstract may be published to a public facing website as a summary of the project, should it be selected for award.

b. Table of Contents

The table of contents must list all required documents and include their corresponding page numbers.

c. Project Design Narrative

The Project Narrative must describe in detail the applicant's response to the FOA. Project Design must present a coherent, evidence-based narrative that links the identified problem to the proposed intervention strategy, expected outcomes, monitoring and evaluation processes, performance measurement approach, and alignment with Administration priorities. Applicants must demonstrate how their design reflects logical progression from problem analysis to activities, outputs, outcomes, and long-term impact that is maintained and continued after the conclusion of the ILAB funded technical assistance. Specifically, the Project Design must include a theory of change demonstrating how proposed activities will lead to an increase in American jobs and wage growth. The Project Design must also include how the applicant plans to monitor results from the project's full theory of change through to increasing American job and wage growth

The Project Design Narrative must contain the following sections and fully address all associated criteria within each. The Project Design narrative is collectively worth a total of 80 points. Point Scoring will be allocated for this section as follows:

(1) LITERATURE REVIEW

2 points – Literature Review. Applicants must include a Literature Review describing the data relied upon to design the project and identify the outcomes sought. All assertions of fact, methodologies employed, and monitoring and evaluation analytics included in an application must be supported by reference materials cited in the Literature Review.

(2) PROJECT STRATEGY AND APPROACH

8 points – Activity Execution. Provide a step-by-step description of the strategic approach to deliver the outcomes necessary for achieving project objectives, including a description of all major areas of proposed interventions, demonstration of the long-term sustainability of all efforts, and attainment of outcomes.

5 points – Analytics. Describe the analytical underpinning for project design, monitoring, evaluation, efficacy, and risk assessment. Included in this section must be a detailed description of current and prior programs that address the same problem, within this sector, and within this country by the U.S. government or other entities. In addition, the Analytics must discuss how the activities noted in the Project Framework will compliment, rather than conflict, with current related activities. This includes a list of potential risks along with approaches to mitigate these risks.

5 points – Adaptive Management. Explain key points within the project where tactical changes in project activities are anticipated and how course correction will be implemented and justified to meet project objectives and outcomes.

5 points – Innovation. Identify novel approaches and new technologies, such as the use of digital financial tools, block chain, digital models, and targeted use of artificial intelligence within the project. This involves an expanded comparative analysis to explain how the project approach is different in both kind and degree from past programs addressing the problem.

5 points – U.S. Benefit. Provide a detailed analysis of how this activity in a foreign country (such as, but not limited to: [i] worker's rights & fair-trade investigation and enforcement, [ii] combating forced labor, trafficked labor, and child labor, and [iii] advocating for multilateral and bilateral terms improving labor standards, etc.) contributes to increased

American job and wage growth consistent with Administration objectives using quantitative data and analyses to the appropriate extent practicable.

(3) PROJECT MILESTONES AND TARGETS

5 points – Milestone and Target Table. Provide a table of milestones and expected completion dates. The applicant's Project Milestones and Targets section will be evaluated based on how well it supports the overall project strategy, as well as for how reasonable project targets are with consideration to the allocation of project resources (e.g., budget, staffing) to support the meeting of those targets.

(4) MONITORING AND EVALUATION

5 points – Outcomes. List the concrete outcomes by which the activity will be assessed. Adequate M&E staffing capacity and resources must be made clear to support monitoring, evaluation and learning activities throughout the project's period of performance. The project must align and comply with applicable federal law, regulations, standards and policies, to include the following:

- 2016 Foreign Aid Transparency and Accountability Act (FATAA) of 2016 (22 USC 2151): Requires Federal agencies that administer foreign assistance to "apply rigorous monitoring and evaluation methodologies to such programs that clearly define program logic, inputs, outputs, intermediate outcomes, and end outcomes."
- OMB M-18-04 Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance (January 2018)
- 2018 Foundations of Evidence-Based Policymaking Act (Evidence Act) of 2018 - Augments GPRMA to promote better use and management of data and evidence, such as through agency learning agendas, evaluation plans, data-driven performance and strategic reviews. A series of Memoranda from OMB provides more detailed guidance to agencies in fulfilling the obligations under this Act:
    - Memorandum on Restoring Trust in the Government Through Scientific Integrity and Evidence-Based Policy Making (January 27, 2021)
    - OMB M-21-27 Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans (June 2021)
    - OMB M-20-12 Program Evaluation Standards and Practices (March 2020)
    - OMB M-19-23 Learning Agendas, Personnel and Planning Guidance (July 2019)

5 points – Success Criteria. Explains what criteria and measurements will be used to ascertain whether the activity has been successful in delivering the outcomes necessary to achieve the project objectives, consistent with alignment and compliance with Administration policies. Implementation of the M&E plan includes collection, disaggregation, quality assessment, analysis, and reporting of milestones and indicator data throughout the period of performance as required by USDOL.

(5) WORK PLAN

5 points – Timeline. Provide a narrative timeline for operations from start up, execution, and closeout or termination. The timeline must identify major project activities and milestones, deadlines for completing these activities, and person(s) or institution(s) responsible for completing these activities for the entire life of the project, as well as a sustainability plan. The timeline must correspond to activities identified in the Project Design, Budget and Budget Narrative.

5 points – Map and/or Flowchart. Provide a map or flow chart to portray the project architecture, mapping project phases into small, management work packages, and breaking major deliverables into logical hierarchical components. This visualization should demonstrate the path needed to ensure which critical tasks must be completed before the next phase can begin.

(6) CAPACITY AND PARTNER STATEMENT

4 points – Experience in Country. List and provide a description of the applicant's past and current operations in the target countries and the performance outcomes.

3 points – Experience in Proposed Target Sector. List and describe past and current operations in the target sector(s) by the applicant.

4 points – Partner Experience. List and describe applicant's partners and/or sub-awardees (foreign government entities, civil society organizations, private sector industries, unions, faith groups, U.S. agencies, etc.) used in past projects, as well as partnerships used in current activities in the target countries and sectors designated in the funding opportunity announcement and targeted by the applicant's proposal.

(7) KEY PERSONNEL

5 points – Staffing Matrix. Provide a list and describe the positions and duties for all senior or key personnel the applicant identifies as required to accomplish the goals and objectives listed in the FOA. Key personnel positions are deemed essential to the successful operation of the project and completion of all proposed deliverables. Names and a brief summary of qualifications for proposed key personnel positions identified by the proposal must be included for each key personnel position described by the applicant. Should the applicant be accepted for award, the applicant must fill each of the key personnel positions within 30 days of award. ILAB, the Federal awarding agency, retains the authority to approve all key personnel changes throughout the life of the award as stated in 2 CFR 200.308(f). Approved key personnel must be available to staff the project no later than 14 calendar days after receiving ILAB permission to hire. Based upon experience and prior ILAB evaluations, ILAB recommends that the Project Director and Monitoring and Evaluation Officer should be designated as key personnel, devoting at least 90 percent of their time to the project. Applicants may propose alternate solutions that depart from this recommendation to meet the experience and level of effort required to achieve the concrete outcomes of the proposal with appropriate justification.

(8) MANAGEMENT PLAN

4 points – Project Management Organizational Chart. The chart will be evaluated based on how well it demonstrates an ability to support proper oversight, reporting, implementation of

the project activities, monitoring and assessment, and delivery of project outcomes necessary to achieve its objectives.

5 points – Project Management Narrative. This narrative must discuss their project's Management Plan, including a description of the structure of the project's proposed management team, key personnel roles and responsibilities, and the lines of authority between key personnel and other project staff responsible for providing services related to the project intervention. The narrative description must address project start-up and closeout procedures, as well as for potential termination of the program.

2. Cost Proposal

Applicants must prepare a cost proposal as part of the application. The cost proposal must reflect consistency between the proposed costs and the work to be performed as outlined in the Project Narrative of the applicant's technical proposal.

If an applicant proposes cost sharing, cost sharing information must be included as part of the cost proposal. Cost sharing is not required for this program. Applications that include any form of cost sharing will not receive additional consideration during the review process. Any approved cost sharing will be subject to the same compliance and reporting requirements as any awarded federal funds.

To promote transparency and full accountability consistent with Administration policy guidance, the Cost Proposal Budget Narrative must present a complete and traceable map of the project's financial structure, clearly showing how funds move through all direct and indirect cost components.

- Detailed Line-Item Budget: Applicants must fully itemize all proposed costs—including personnel, fringe, travel, equipment, supplies, contractual services, and indirect charges—to demonstrate that requested funds support necessary and nonduplicative programmatic functions.
- Subrecipient and Vendor Disclosure: Applicants must list all proposed subrecipients and vendors, including legal names, EINs, and entity classifications, to ensure full transparency in financial and organizational relationships to the extent allowed by law.
- Merit-Based Compensation: Consistent with Administration policy guidance, applicants must disclose the compensation levels of all Key Personnel and justify them based on merit, responsibilities, and required technical expertise.
- Historical Financial Documentation: Applicants must provide three years of organizational financial statements to demonstrate solvency, fiscal reliability, and responsible historical expenditure patterns.

As part of the process of developing a cost proposal, the applicant must have a Unique Entity Identifier (UEI) number and be registered in System for Award Management (SAM). In addition, the cost proposal must contain the following:

- SF-424 Application for Federal Assistance;
- SF-424A Budget Information Form;
- SF-424A Budget Narrative;
- Country-Specific Budget Narrative; and
- Indirect cost supporting documentation.

a. Requirement for SAM Registration

Applicants must register with the System for Award Management (SAM) before submitting an application. Instructions for registering with SAM can be found at https://www.sam.gov. A recipient must maintain an active SAM registration with current information at all times during which it has an active federal award or an application under consideration. To remain registered in the SAM database after the initial registration, the applicant is required to review and update the registration at least every 12 months from the date of initial registration or from the date of subsequent updates to ensure it is current, accurate, and complete. If applicant entities do not renew their SAM registration, it will expire. An expired registration can delay or prevent application submission in Grants.gov. Registration and renewal can take up to ten business days to complete. For clarification, the applicant is the entity that meets the eligibility criteria and has the legal authority to apply and to receive the award. If an applicant has not fully complied with these requirements by the time the Grant Officer is ready to make a federal award, the Grant Officer may determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

b. Requirement for Unique Entity Identifier (UEI Number)

All applicants for federal grant and funding opportunities must have a UEI and must supply their UEI on the SF-424. The UEI is a 12-character alphanumeric code that uniquely identifies all entities. Any entity registering to do business with the government is required to have one. UEIs are issued by SAM.gov and are a part of an entity's record in the Entity Information section of SAM.gov. If your organization does not have a UEI, one can be obtained for free at https://sam.gov.

Grant recipients authorized to make subawards must meet these requirements related to UEIs:

- Grant recipients must notify potential sub-recipients that no entity may receive a subaward unless the entity has provided its UEI.
- Grant recipients may not make a subaward to an entity unless the entity has provided its UEI.

See Appendix A to 2 CFR Part 25.

c. SF-424 Application for Federal Assistance

Applicants must complete the SF-424, Application for Federal Assistance, available for review at SF-424 Family | Grants.gov. The SF-424 instructions are also available at the same link. (Please note that the PDF forms available at this link are for sample purposes only and cannot be submitted with your application package. If you are applying for a grant, please complete and submit your application using Grants.gov Workspace.)

The SF-424 must clearly identify the applicant and must be signed by an individual with authority to enter into an award agreement. Upon confirmation of an award, the individual signing the SF-424 on behalf of the applicant is considered the Authorized Representative of the applicant. As stated in block 21 of the SF-424 form, signature of the Authorized Representative on the SF-424 certifies that the organization is in compliance with the Assurances and Certifications form SF-424B, also available at SF-424 Family | Grants.gov.The SF-424B is not required to be submitted with the application.

Box 8b should include the applicant's Employer Identification Number (EIN) as applicable. Domestic entities should have an EIN whereas international entities may or may not have an EIN. For international entities without an EIN, this box should be marked 44-4444444. Further information on the EIN is available at https://www.irs.gov.

IMPORTANT NOTE for applicants with non-U.S. addresses: On the SF-424, page 1, Section 8d, please enter “DC” into the State field and "20210" into the Zip/Postal Code field. This is extremely important for ensuring your application is received by USDOL.

d. SF-424A Budget Information (Non-Construction Programs)

Applicants must complete the SF-424A Budget Information Form, available for review at SF-424 Family | Grants.gov.(Please note that the PDF forms available at this link are for sample purposes only and cannot be submitted with your application package. If you are applying for a grant, please complete and submit your application using Grants.gov Workspace.) Applicants must use the columns in Section B of the SF-424A to provide line-item costs for each year of the cooperative agreement’s period of performance.

e. SF-424A Budget Narrative and the Country-Specific Budget and Budget Narrative (20 points)

The SF-424A Budget Narrative will be evaluated on the following:

1. the extent to which it supports the overall project strategy and reflects proposed project activities (5 points);
2. the extent to which it is reasonable and proportionate relative to the expected outcomes and impact (5 points); and,
3. The extent to which it follows the instructions outlined for the applicable budget requirements that follow (10 points):

Applicants must submit a SF-424A Budget Narrative that provides a detailed description of component costs associated with each line item on the SF-424A. The line-item explanations must also describe in detail the cost variances that occur across each year of the period of performance (e.g. compare/contrast proposed costs for Year 2 vs. Year 1). The SF-424A Budget Narrative must include a detailed justification for each line-item cost and clearly state how each cost item supports the project. The budget narrative must be detailed enough so ILAB can understand how each cost is calculated and how each cost directly relates to the proposed project activity. The SF-424A Budget Narrative should also include a section describing any leveraged resources, if applicable, to support grant activities. Leveraged resources are all resources, including cash and in-kind, in excess of the award and associated cost sharing. Valuation of leveraged resources follows the same requirements as cost sharing. Applicants are encouraged to leverage resources to increase stakeholder investment in the project and broaden the impact of the project itself. The SF-424A Budget Narrative should also include a section detailing voluntary cost share, if applicable. Note that subrecipient costs should be explained in the OTHER line item. Detailed subrecipient budgets will be requested of selected awardees post-award.

For multi-country applications, applicants must also provide a separate line-item budget for each country of implementation. Each Country-Specific Budget must include the same line items of the SF-424A. Applicants must also submit a Country-Specific Budget Narrative for each Country-Specific Budget, following the instructions provided below for the SF-424A Budget Narrative, explaining in detail costs associated with activities in that country, ensuring full transparency and consistency across budget documents. A recommended format for the country line item budget is as follows:

Budget Summary Categories	**Year XX**	**Year XX**	**Cost Share** ***(if applicable)***	**Total Federal Funds Requested**	**Total Cost of Project** ***(includes cost-share, if applicable)***
1. Personnel					
2. Fringe Benefits					
3. Travel					
4. Equipment					
5. Supplies					
6. Contractual					
7. Construction					
8. Other Direct Costs					
9. Total Direct Costs (lines 1-8)					
10. Indirect Costs					
11. Total Costs (lines 9-10)					

The sum of the budget categories must align with the total funding referenced on the SF-424 and SF-424A. All budgets must comply with federal cost principles. Allowable costs include those specifically defined in 2 CFR Part 200. If selected for funding, the approved budgets will become part of the award, and any costs omitted by the applicant may not be allowed after award. Applicants may not rely on other contracts, grants, or awards to implement the applicant's proposed strategy. The budget(s) and budget narrative(s) submitted with the application must include all necessary funds to implement the proposed project strategy. ILAB will not provide any additional funding to cover unanticipated costs.

The GOR and the Grant Officer reserve the right to request more detailed line-item budget information post-award, if they deem it necessary.

Applicants must use the following guidance in preparing their Budget Narratives for both the SF-424A and Country-Specific Budgets:

1) Personnel
Enter funds required for compensation of personnel for the proposed project. List all staff positions by title and/or proposed role on the project. Give the annual salary of each position, the percentage of each position's time devoted to the project, the amount of each position's salary funded by the award, and the total personnel cost for the period of performance. Include only personnel costs of employee salaries and wages engaged in activities under the program. Costs associated with M&E personnel must be included under the personnel line item. See 2 CFR §200.430 for more information on allowable compensation for personnel costs. Do not include the personnel costs of consultants, contractors and subrecipients under this category. If not applicable, leave blank.

2) Fringe Benefits
Enter funds required for compensation of fringe benefits for the proposed project by position. Costs of employee fringe benefits are allowances and services provided by employers to their employees in addition to regular salaries and wages. For more information on fringe benefits, please refer to 2 CFR §200.431.

Do not include the fringe benefits of consultants, contractors, and subrecipients, because those costs should be listed under the "Contractual" category as part of the total value of the contract or agreement. Typically, fringe benefit amounts are determined by applying a calculated rate for a particular class of employee (full-time or part-time) to the salary and wages requested. Fringe rates are often specified in the approved indirect cost rate agreement. Fringe benefits may be treated as a direct cost or indirect cost in accordance with the applicant's accounting practices. Only fringe benefits as a direct cost should be entered under this category. If not applicable, leave blank.

3) Travel
For the applicant's project staff only, specify the purpose, number of staff traveling, per diem, estimated number of trips, and other estimated costs for each type of travel. Include costs of project-related travel (i.e., transportation, lodging, subsistence, and other related items) by employees who are in travel status on official business of the project operator. Travel by non-employees such as consultants, contractors or subrecipients should be included under the "Contractual" category. Local travel for

employees in non-travel status should be listed on the "Other" category. Travel costs should be developed in accordance with the applicant's travel policies and applicable regulations (e.g., 2 CFR §200.475). If not applicable, leave blank.

Applicants must allocate sufficient funds to finance appropriate in-country and international travel. Please note that all travel costs paid for with federal funding must comply with the Fly America Act, see Section VI.B.3.i. At a minimum, applicants must allocate funds for:

- Travel for two key personnel for two possible trips to Washington, D.C. or regionally to attend DOL-sponsored trainings/events. Other key and/or non-key personnel may also be budgeted, and in this case, a justification should be included; and
- Travel by the Project Director based in the field to meet annually with ILAB officials in Washington, D.C. or another site determined by ILAB. M&E Officers (where applicable) must also be budgeted for travel to Washington, D.C. or regionally at least once during the life of the project. Other personnel may also be budgeted, and in this case, a justification should be included.

4) Equipment
Enter funds required for equipment for the proposed project. "Equipment" means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds the lesser of: (a) the capitalization level established by the recipient or subrecipient for the financial statement purposes, or (b) $10,000.

Acquisition cost means the net invoice unit price of an item of equipment, including the cost of any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Ancillary charges, such as taxes, duty, protective in- transit insurance, freight, and installation, may be included in, or excluded from, acquisition cost in accordance with the applicant's regular written accounting practices. For more information, please see 2 CFR §200.1, 200.313, and 200.439. If not applicable, leave blank.

For any proposed equipment the applicant should identify the:

1. Item name;
2. Item description and basic specifications;
3. Estimated useful life of equipment;
4. Item cost, actual or estimated (and total cost if multiple items), including the cost to put the asset(s) in place and make it usable for the purpose it was acquired, if known;
5. Purpose of acquisition provided in a description of how the equipment will be used to support the awarded project and a reference to the approved activities in the Statement of Work (and the page numbers, if known). This description and justification are critical as the information will provide the documentation

that the costs to be incurred are for approved project-related activities and in the best interests of the government.

For equipment not included in the applicant's submitted proposal, recipients must formally submit a written request to the Grant Officer via the Grant Officer's Representative seeking prior approval. In general, DOL does not permit the purchase of equipment during the last funded year of the award.

5) Supplies
Enter funds required for supplies for the proposed project. List the item, quantity, and the unit cost per item. Supplies are all tangible personal property other than those described in the *equipment* definition. A computing device is a supply if the acquisition cost is below the lesser of the capitalization level established by the recipient or subrecipient for financial statement purposes or $10,000, regardless of the length of its useful life. See this section's definitions of *computing devices* and *equipment.* For more information, please see 2 CFR §200.1, 200.314, and 200.453. If not applicable, leave blank.

Note that general office supplies like pens, paper, paper clips, etc. may be estimated as one category called General Office Supplies, and it need not be itemized. In general, applicants should not propose purchasing supplies or equipment for use by a host government to cover costs that would normally be the responsibility of the host government. Any such proposed expenditure would be subject to Grant Officer approval post-award.

6) Contractual
Enter funds required for contractual costs for the proposed project. Under the Contractual line item, delineate contracts and subawards separately. For each proposed contract and subaward, specify the purpose and activities to be provided, and the estimated cost. Include the cost of all contracts except those that should be placed under other categories such as equipment, supplies, or construction.

Contracts are defined according to 2 CFR §200.1 as a legal instrument by which a recipient or subrecipient conducts procurement transactions 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 contribute to the goals and objectives of the project by carrying out part of a federal award received by the pass-through entity. It does not include payments to a contractor, beneficiary, or participant. A subaward may be provided through any form of legal agreement consistent with criteria within §200.331, including an agreement the passthrough entity considers a contract.

The applicant must adhere to procurement standards outlined at 2 CFR §200.317 - 200.327 and the subaward requirements at 2 CFR §200.331 - 200.333. Include third-party evaluation contracts, procurement contracts, and subawards. Costs related to individual consultants should be listed in the "Other" category.

If applicable and charged as a direct cost, include third-party renting or leasing agreements for equipment; and, third-party renting or leasing agreements for real property (building, facility, administrative office, space, structure, land, and other real property) used specifically for the program.

7) Construction Costs

ILAB awards are non-construction awards. If construction activities are necessary under an ILAB award, they would be rare and minor. Construction with funds under the cooperative agreement requires USDOL prior approval and ordinarily should not exceed 10 percent of the project budget's direct costs. Funds for construction must be clearly specified in the budget. Any activities that lead to the creation of real property that is of a permanent nature must be classified under construction expenses. In addition, expenses in support of construction cannot be classified as supplies and should be regarded as construction activities.

In general, USDOL expects construction to be limited to improving existing infrastructure and facilities utilized by direct recipients. To promote sustainability, USDOL encourages recipients to secure matching funds, in-kind contributions, or other forms of cost sharing from the government, communities and local organizations when proposing construction activities.

All modifications to the project's budget to address construction related changes require a formal project revision request to be approved by the Grant Officer. See also 2 CFR 200.439 Equipment and other capital expenditures for guidance on allowable costs.

8) Other Direct Costs

Enter all other costs for the applicant's project that are not listed elsewhere in the budget. Such costs, where applicable and allowed under the program, may include: individual consultant costs; local travel; insurance; medical and dental costs (non-personnel); professional service costs; depreciation of equipment and real property (when treated as a direct cost), printing and publications, training costs (tuition and stipends), staff development costs, monitoring and evaluation costs, and administrative costs (when treated as a direct cost). Applicants must allocate funds for costs related to 508 compliance for relevant documents produced under the grant that will be made available to the public by the awardee or USDOL. Provide clear and specific detail, including costs, for each item so that it can be determined whether the costs are necessary, reasonable, and allocable. If not applicable, leave blank.

Purchase costs, including principal and interest, for real property are unallowable under this solicitation. Please note that DOL may require additional information be provided before proceeding and/or incurring costs and may be subject to additional requirements and reviews. Real property requirements are found at 2 CFR 200.311. Please consult the Grant Officer regarding any and all circumstances pertaining to this real property.

Applicants should include participant support-related costs under Other Costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training activities based on proposed project activities (2 CFR 200.1).

Subrecipient costs must be noted under OTHER. Detailed subrecipient budgets will be requested post-award.

9) Total Direct Costs
Enter the sum of 1) Personnel through 8) Other Direct Costs.

10) Indirect Costs
Applicants, along with proposed subrecipients, may request indirect costs according to federal regulations. Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. Indirect cost charges must be based on allowable (i.e., necessary, reasonable, conforming, consistent and documented) costs based on the applicable cost principles. Applicants, including subrecipients, may request indirect costs based on a negotiated indirect cost rate (NICRA). Recipients and subrecipients that do not have a current Federal negotiated indirect cost rate (including provisional rate), may elect to charge a de minimis rate of up to 15 percent of modified total direct costs (MTDC). The recipient or subrecipient is authorized to determine the appropriate rate up to this limit. See 2 CFR 200.414(f) for full requirements.

The following supporting documentation is required:

- For organizations, including subrecipients, with a NICRA approved by the Federally Cognizant Agency (FCA): Please 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 the cost allocation base. Also, provide a current version of the NICRA.
- For organizations, including subrecipients, that do not have a current negotiated (including provisional) rate, with exceptions noted in 2 CFR 200.414(f), and wish to request a de minimis indirect cost rate of up to 15 percent of MTDC (defined in 2 CFR 200.1): Please confirm that the organization meets the requirements as described in 2 CFR 200.414(f). Clearly state that the organization does not have a current negotiated (including provisional) rate. Provide an explanation of which portion of each line item, along with the associated costs, are included in your cost allocation base. If approved, the de minimis rate must be used consistently for all federal awards and may be used indefinitely or until the organization negotiates a rate.
- 2 CFR 200.1 / Modified Total Direct Cost (MTDC) means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards and subcontracts up to the first $50,000 of each subaward (regardless of the period of performance of the subawards 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 in excess of $50,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

- For organizations, including subrecipients, with no budgeted/claimed indirect costs: Please certify that all requested costs are directly allocable to the proposed project and not supported from any other source.
- For organizations with an expired indirect cost rate or a rate not previously approved by the FCA (except those recipients approved for the de minimis rate), please certify that an indirect cost proposal will be submitted to the FCA within 90 days of award to establish a provisional NICRA. This provisional rate may be effective for a period up to two years until a final NICRA is established. Applicants may choose to include estimated indirect costs in the proposed budget. If the application is selected for award, the Grant Officer will release funds in the amount of 15 percent of salaries and wages to support indirect costs until a provisional rate is available.

11) Total Costs

Enter the sum of 9) Total Direct Costs and 10) Indirect Costs.

f. SF-424A Budget Narratives must also address the following, as applicable:

Project Monitoring & Evaluation (M&E) Activities
Applicants must budget funds to cover the costs associated with project M&E activities. Projects must set aside a minimum of 5 percent and up to 8 percent of the project budget's total direct costs to cover the costs associated with project M&E activities. The costs for M&E activities must be included in two of the required application components: 1.) In the Budget Narrative, applicants must identify each planned M&E activity and its associated cost, organized by budget category (i.e., the SF-424A budget categories); and 2.) in the Work Plan applicants must provide a description of the project M&E activities, as well as list the associated costs. The sum of the M&E activity costs listed in the Budget Narrative must match the sum of the M&E activity costs cited in the Work Plan.

In developing their proposals, it is important that applicants carefully consider and budget adequately for a full range of M&E-related costs throughout the life cycle of the project, including not only implementation monitoring, but also ongoing knowledge management and learning activities that explicitly support adaptive management of the project. In general, the applicant should consider the USD exchange rate (and potential fluctuations) for the local currency and the scope, size, geography and complexity of the project in conjunction with monitoring, evaluation, learning and adaption needs. The M&E budget should take into account monitoring for emergent results and collaborative processes to share and make sense of data with project partners and key stakeholders to inform project management, learning, adaptation, and accountability.

When budgeting for M&E costs, applicants must ensure that the budget adequately reflects the full range of monitoring, evaluation, and learning activities required for successful project oversight and adaptive management. At a minimum, applicants should allocate funds for the following:

- The development, implementation, and ongoing adaptation of all required M&E deliverables over the life of the project.
- Support for the design and periodic refinement of the project's M&E Plan, including country travel for project staff, logistical and administrative expenses for strategy validation workshops, and other planning activities necessary to maintain an effective M&E system.
- Annual reviews of performance data, milestone verification, indicator quality checks, and other internal validation activities necessary to assess progress and inform adaptive management decisions.
- Percentage of the total project budget allocated as direct costs for monitoring and evaluation (M&E) activities**.**

g. Audits and Attestation Engagements (See Section VI. B. 2.)

If the project is $5 Million or more:

(1) Single Audits include costs for meeting the single audit requirements (as described in 2 CFR 200 Subpart F Audit Requirements) as direct or indirect costs, whichever is appropriate, in accordance with allowable cost allocation procedures.

(2) Project-specific audits may be required by USDOL to provide additional project oversight of the recipients' validation and monitoring processes, including internal and financial controls and reporting processes. If a PIO has existing internal requirements or prohibitions that would not allow USDOL's external attestation engagements, the PIO may request an exception to the normal attestation engagement process. If an exception will be requested, applicants must include sufficient direct costs in their budget for a project- specific audit to be conducted by their organization's designated external auditor. In this case, the applicant PIO must also include a copy of the internal requirement or regulation prohibiting an attestation engagement as part of its application package. If an exception with supporting documentation is not requested, then the attestation engagement requirements outlined above will apply.

If the project is less than $5 Million:

(1) Single Audits include costs for meeting the single audit requirements (as described in 2 CFR 200 Subpart F Audit Requirements) as direct or indirect costs, whichever is appropriate, in accordance with allowable cost allocation procedures.

(2) Project-specific audits may be required by USDOL to provide additional project oversight of the recipients' validation and monitoring processes, including internal and financial controls and reporting processes. If a PIO has existing internal requirements or prohibitions that would not allow USDOL's external attestation engagements and is selected for an attestation agreement, the PIO may request an exception to the normal attestation engagement process. In this case, the applicant

PIO must provide a copy of the internal requirement or regulation prohibiting an attestation engagement. If the award is selected for an attestation engagement during the life of the project, successful applicants will be required to undertake a budget re-allocation or a cost increase to conduct a project-specific audit. If an exception with supporting documentation is not requested, then the attestation engagement requirements outlined above will apply.

h. Communications

In addition to funding set aside for project communication related activities, projects must budget for the creation of visual assets (professional photography and videography) or other type of assets that will help communicate the purpose and impact of the project. These assets are a critical medium to increase awareness and understanding about global labor standards, including child labor, forced labor, occupational safety and health, employment discrimination, collective bargaining, and freedom of association, and illustrate that work to address the issues in the context of this project. For projects operating in one country, at least $50,000 of direct costs should be committed to support the production of communications assets. For projects operating in multiple countries, projects should set aside a total of $75,000 to support communications assets related costs. The successful applicant is required to get approval from ILAB for how to budget and re-budget these funds throughout the life of the projects. A communications plan will be developed by the recipient post-award.

i. Value Added Tax (VAT)

Foreign VAT taxes charged for the purchase of goods or services that a non-federal entity is legally required to pay in country are an allowable expense under federal awards. After notifying USDOL, the recipients and subrecipients shall make every effort to apply for and receive VAT exemption in the country or countries in which the project operates [2 CFR 200.470(c)].

The recipient will report on the progress of its application for VAT exemption in its Technical Progress Reports. See the MPG for further guidance on VAT exemptions.

j. Housing

If included in the budget, provide in the budget narrative a justification for any proposed housing costs, housing allowances, and/or personal living expenses. In accordance with federal cost principles, personnel housing and personal living expenses are only allowable as direct costs in the project budget. USDOL funds may only be used to pay for the housing costs, housing allowances, and personal living expenses (e.g., dependents' allowance) of project staff if they (1) are separately accounted for as direct costs of the project necessary for the performance of the project and (2) receive prior approval from USDOL. Applicants must provide a brief explanation as to why such costs are considered necessary for the performance of the project, consistent with the organization's established policies, and reasonable for the country where the staff person will reside.

k. Funds to Host Country Governments

Generally, recipients may not provide any funds from a USDOL award to a foreign government or entities that are agencies of, or operated by or for, a foreign state or government, ministries, officials, or political parties, except in cases consistent with the guidance in the MPG. If, in rare cases, funds are proposed to support a host country government, they must be included in Other Costs, itemized, and described in detail in the budget narrative. Such funds must not duplicate existing foreign government activities, substitute for such activities, or be used for the foreign government's purchase of equipment or supplies to support those activities for which the foreign government (whether at the national, local, district, provincial or other level of government) has already assumed responsibility. *Prior approval from USDOL is required for any costs budgeted in this category for activities for which such governments have already assumed responsibility.*

3. Submission Date, Times, and Process

Due Date for Applications: September 21, 2026
You must submit your application electronically on https://www.grants.gov **no later than 11:59 p.m. Eastern Time on the closing date.**

Applicants are encouraged to submit their application before the closing date to minimize the risk of late receipt. We will not review applications received after 11:59 p.m. Eastern Time on the closing date.

a. Hardcopy Submission
No applications submitted in hardcopy by mail or hand delivery (including overnight delivery) will be accepted for this funding opportunity. We will not accept applications sent by e-mail, telegram, or facsimile (FAX).

b. Electronic Submission through Grants.gov
Applicants submitting applications must ensure successful submission **no later than 11:59 p.m. Eastern Time on the closing date.** Grants.gov will subsequently validate the application.

The process can be complicated and time-consuming. You are strongly advised to initiate the process as soon as possible and to plan for time to resolve technical problems. Note that validation does not mean that your application has been accepted as complete or has been accepted for review by the agency. Rather, Grants.gov verifies only the submission of certain parts of an application.

1) How to Register to Apply through Grants.gov
Read through the registration process carefully before registering. These steps may take as long as four weeks to complete, and this time should be factored into plans for timely electronic submission in order to avoid unexpected delays that could result in the rejection of an application.

Applicants must follow the online instructions for registration at Applicant Registration | Grants.gov. We recommend that you prepare the information requested before beginning the registration process. Reviewing and assembling required information before beginning the registration process will alleviate last-minute searches for required information and save time.

An application submitted through Grants.gov constitutes a submission as an electronically signed application. The registration and account creation with Grants.gov, with E-Biz Point of Contact (POC) approval, establishes an Agency Organizational Representative (AOR). When an application is submitted through Grants.gov, the name of the AOR who submitted the application is inserted into the signature line of the application, serving as the electronic signature. The E-Biz POC must authorize the individual who is able to make legally binding commitments on behalf of your organization as the AOR; this step is often missed and it is crucial for valid submissions.

2) How to Submit an Application to DOL via Grants.gov
Grants.gov applicants can apply online using Workspace. Workspace is a shared online environment where members of a grant team may simultaneously access and edit different webforms within an application. For a complete workspace overview, refer to Workspace-Overview | Grants.gov. For access to complete instructions on how to apply for opportunities, refer How to Apply for Grants | Grants.gov.

When a registered applicant submits an application with Grants.gov, an electronic time stamp is generated within the system when the application is successfully received by Grants.gov. Grants.gov will send the applicant AOR an email acknowledgement of receipt and a tracking number (GRANT_________) with the successful transmission of the application, serving as proof of timely submission. The applicant will receive two email messages to provide the status of the application's progress through the system:

- The first email will contain a tracking number and will confirm receipt of the application by Grants.gov.
- The second email will indicate the application has either been successfully validated or has been rejected due to errors.

Grants.gov will **reject applications if the applicant's registration in SAM is expired. Only applications that have been successfully submitted by the deadline and later successfully validated will be considered.** It is your responsibility to ensure a timely submission. While it is not required that an application be successfully validated before the deadline for submission, it is prudent to reserve time before the deadline in case it is necessary to resubmit an application that has not been successfully validated. Therefore, enough time should be allotted for submission (24-48 hours) and, if applicable, additional time to address errors and receive validation upon resubmission (an additional two business days for each ensuing submission). It is important to note that if enough time is not allotted and a rejection notice is received after the due date and time, DOL will not consider the application.

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 will prevent DOL from considering the application. We will attempt to open the document, but will not take any additional measures in the event of problems with opening.

We strongly advise applicants to use the various tools and documents, including FAQs, which are available on the "Applicant Resources" page at [Applicant FAQs | Grants.gov.]

We encourage new prospective applicants to view the online tutorial, "Grant Applications 101: A Plain English Guide to ETA Competitive Grants," available through WorkforceGPS at https://strategies.workforcegps.org/resources/2014/08/11/16/32/applying-for-eta-competitive-grants-a-web-based-toolkit-for-prospective-applicants-438?p=1.

To receive updated information about critical issues, new tips for users, and other time-sensitive updates as information is available, you may subscribe to "Grants.gov Updates" at Manage Subscriptions | Grants.gov.

If you encounter a problem with Grants.gov and do not find an answer in any of the other resources, contact one of the following:

- call 1-800-518-4726 or 606-545-5035 to speak to a Customer Support Representative or email support@grants.gov.

The Grants.gov Contact Center is open 24 hours a day, 7 days a week but closed on federal holidays. If you are experiencing difficulties with your submission, it is best to call the Grants.gov Support Center and get a ticket number.

Late Applications

We will consider only applications successfully submitted through Grants.gov no later than 11:59 p.m. Eastern Time on the closing date and then successfully validated. **You take a significant risk by waiting to the last day to submit through Grants.gov.**

C. INTERGOVERNMENTAL REVIEW

This funding opportunity is not subject to Executive Order 12372, "Intergovernmental Review of Federal Programs."

D. FUNDING RESTRICTIONS

All proposed project costs must be necessary and reasonable and in accordance with federal guidelines. Determinations of allowable costs will be made in accordance with the Cost Principles, now found in the Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), codified at 2 CFR Part 200 and at 2 CFR Part 2900. Disallowed costs are those charges to an award that the grantor agency or its representative determines not to be allowed in accordance with the Cost Principles or other conditions contained in the award. Applicants, whether successful or not, will not be entitled to reimbursement of pre-award costs.

E. INTELLECTUAL PROPERTY RIGHTS

Pursuant to 2 CFR 2900.13, to ensure that the federal investment of DOL funds has as broad an impact as possible and to encourage innovation in the development of new learning materials, the recipient will be required to license to the public all work created with the support of the grant under open licensing. Work that must be licensed under open licensing includes both new content created with the grant funds and modifications made to pre-existing, recipient-owned content using grant funds.

This license allows subsequent users to copy, distribute, transmit, and adapt the copyrighted work and requires such users to attribute the work in the manner specified by the recipient. Notice of the license shall be affixed to the work.

Questions about open licensing as it applies to this specific funding opportunity should be submitted to the email address specified in Section VII.

Only work that is developed by the recipient in whole or in part with grant funds is required to be licensed under open licensing. Pre-existing copyrighted materials licensed to or purchased by the recipient from third parties, including modifications of such materials, remain subject to the intellectual property rights the recipient receives under the terms of the particular license or purchase. In addition, works created by the recipient without grant funds do not fall under the open licensing requirement.

The purpose of the open licensing requirement is to ensure that materials developed with funds provided by these grants result in work that can be freely reused and improved by others. When purchasing or licensing consumable or reusable materials, the recipient is expected to respect all applicable federal laws and regulations, including those pertaining to the copyright and accessibility provisions of the Federal Rehabilitation Act.

Separate from the open licensing to the public, the Federal Government reserves a paid-up, nonexclusive, and irrevocable license to reproduce, publish, or otherwise use, and to authorize others to use for federal purposes (i) the copyright in all products developed under the grant, including a subaward or contract under the grant or subaward; and (ii) any rights of copyright to which the recipient, subrecipient, or a contractor purchases ownership under an award (including, but not limited to, curricula, training models, technical assistance products, and any related materials). Such uses include, but are not limited to, the right to modify and distribute such products worldwide by any means, electronically or otherwise. The recipient may not use federal funds to pay any royalty or license fee for use of a copy-righted work, or the cost of acquiring by purchase a copyright in a work, where the Department has a license or rights of free use in such work. If revenues are generated through selling products developed with grant funds, including intellectual property, DOL treats such revenues as program income. Such program income is added to the grant and must be expended for allowable grant activities.

F. OTHER SUBMISSION REQUIREMENTS

Withdrawal of applications: Applications may be withdrawn by written notice to the Grant Officer at any time before an award is made.

V. APPLICATION REVIEW INFORMATION

A. CRITERIA

USDOL has instituted procedures for assessing the technical merit of applications to provide for an objective review of applications and to assist applicants in understanding the standards against which an application will be judged. The evaluation criteria are based on the information required in the application as described in Section IV.B.1. (Technical Proposal including Attachments) and Section IV.B.2. (Cost Proposal). Applicants are required to complete all elements of the application package, including the various components of the technical narrative, budget documentation and justification, other narrative materials, and all forms, certifications, and attachments stated as necessary for submission. Applicants must ensure that every element is included and formatted according to FOA specifications to avoid disqualification. This includes every section and subsection within the categories: (1) project design, (2) milestones & targets, (3) M&E, (4) work plan, (5) organizational capacity, (6) key personnel, (7) management plan, and (8) budget narrative and budget line-itemization. Failure to include all these elements will render an application package incomplete. Reviewers will award points based on the evaluation criteria described in the table that follows:

CRITERION	**REFERENCE**	**POINTS**
Literature Review	**IV.B.1.c.1**	***2***
Project Strategy and Framework *Activity Execution* *Project Analytics* *Adaptive Management* *Innovation* *U.S. Worker Benefit*	**IV.B.1.c.2**	**28** ***8*** ***5*** ***5*** ***5*** ***5***
Project Milestones and Targets	**IV.B.1.c.3**	**5**
Monitoring and Evaluation *Desired Outcomes* *Criteria for Success*	**IV.B.1.c.4**	**10** ***5*** ***5***
Work Plan *Timeline* *Map/Flowchart*	**IV.B.1.c.5**	**10** ***5*** ***5***
Capacity and Partner Statement *Experience in Country* *Experience in Proposed Target Sector* *Partner Experience*	**IV.B.1.c.6**	**11** *4* *3* *4*
Key Personnel	**IV.B.1.c.7**	**5**
Management Plan *Organization Chart* *Project Management Narrative*	**IV.B.1.c.8**	**9** *4* *5*
SF-424A Budget Narrative and Country-Specific Budget Narratives	**IV.B.2.e.**	**20**
TOTAL		**100**

Standards for Evaluating the Applicant's Response to each Requirement
Section IV.B, Project Narrative, provides a detailed explanation of the information an application must include (e.g., a comprehensive work plan for the whole period of performance with feasible and realistic dates). Reviewers will rate each "rating factor" based on how fully and convincingly the applicant responds. For each "rating factor" under each "criterion," panelists will determine whether the applicant thoroughly meets, partially meets, or fails to meet the "rating factor," unless otherwise noted in Section IV.B, based on the definitions below:

Standard Rating	Definition	Standard for Calculating Points
Thoroughly Meets	The application thoroughly responds to the rating factor and fully and convincingly satisfies all of the stated specifications.	Full Points
Partially Meets	The application responds incompletely to the rating factor or the application convincingly satisfies some, but not all, of the stated specifications.	Partial Points
Fails to Meet	The application does not respond to the rating factor or the application does respond to the rating factor but does not convincingly satisfy any of the stated specifications.	Zero Points

In order to receive the maximum points for each rating factor, applicants must provide a response to the requirement that fully describes the proposed program design and demonstrates the quality of approach, rather than simply re-stating a commitment to perform prescribed activities. In other words, applicants must describe why their proposal is the best strategy and how they will implement it, rather than that the strategy contains elements that conform to the requirements of this FOA. The proposal evaluation process is a two-tiered review, involving a technical panel assessment and a policy alignment appraisal.

B. REVIEW AND SELECTION PROCESS

1. Merit Review and Selection Process

A technical merit review panel will carefully assess applications against the FOA evaluation criteria to determine the merit of applications. Using the point distribution specified above, applications will be evaluated based on how well their technical and cost proposals demonstrate a clear understanding of the needs, gaps, and overall scope of problems, as well as how the application proposes activities that are appropriate, achievable, and where applicable, innovative, in supporting the objective and intended outcomes in this FOA. As indicated in the scoring criterion table above, applicants' proposals will also be assessed on how well the panel believes the components of the proposal fit together to support an overall Theory of Change. Up to 100 points may be awarded to an applicant, depending on the quality of the responses provided. The final scores (which may include the mathematical normalization of review panels where more than one review panel is used) will serve as the primary basis for selection of applications for funding. The panel results are advisory in nature and not binding on the Grant Officer. The Grant Officer reserves the right to make selections based solely on the final scores or to take into consideration other relevant factors when applicable. Such factors may include the geographic distribution of awards, the results of a risk review process (see Section V.B.2), past performance information, the status of open audit findings, and other relevant factors. The Grant Officer may consider any information that comes to their attention. Consistent with Executive Order 14332, all else being equal, applications demonstrating lower indirect cost rates will receive positive consideration during the selection process. Prior to issuance, and annually thereafter, awards will be subject to review in accordance with the process described in Executive Order 14332, Improving Oversight of Federal Grantmaking.

The applicant's signature on the SF-424, including electronic signature via E-Authentication on https://www.grants.gov/, constitutes a binding offer by the applicant and constitutes agreement to the terms and conditions. The government may elect to award funds with or without discussions with the applicant.

2. Risk Review Process

Risk Review Process

Prior to making an award, DOL will review and consider any information about the applicant that is in the responsibility/qualification records available in SAM.gov (see 41 U.S.C. 2313). All applicants are requested to submit the information on the Financial Risk Assessment template specified below for DOL to assess the applicant's Financial System. Applicants may review and comment on any information in the responsibility/qualification records available in SAM.gov. Before making decisions in the risk review required by 2 CFR 200.206 and 2 CFR 2900.5, DOL will consider any comments by the applicant, along with information available in the responsibility/qualification records in SAM.gov. Additionally, DOL will comply with the requirements of 2 CFR Part 180 implemented at 2 CFR Part 2998 (Non-procurement Debarment and Suspension). This risk evaluation may incorporate results of the evaluation of the applicant's eligibility (application screening) or the quality of its application (merit review). If DOL determines that an award will be made, special conditions that correspond to the degree of risk assessed may be applied to the award. Criteria to be evaluated include the following:

i. Financial stability. The applicant's record of effectively managing financial risks, assets, and resources;
ii. Management systems and standards. Quality of management systems and ability to meet the management standards prescribed in the Uniform Grant Guidance;
iii. History of performance. The applicant's record of managing previous and current Federal awards, including compliance with reporting requirements and conformance to the terms and conditions of Federal awards, if applicable;
iv. Reports and findings from audits performed under Subpart F–Audit Requirements of the Uniform Grant Guidance or the reports and findings of any other available audits and monitoring reports containing findings, issues of non-compliance, or questioned costs;
v. Ability to effectively implement requirements. The applicant's ability to effectively implement statutory, regulatory, and other requirements imposed on recipients.

Quantitative Efficiency Assessment

In addition to the above standard risk review process, ILAB will apply a set of data-driven Financial Health Key Performance Indicators (KPIs) to evaluate each applicant's fiscal efficiency, operational reliability, and stewardship of federal funds, in alignment with Administration policy guidance.

i. Liquidity Ratio (Current Assets ÷ Current Liabilities): Assesses whether the organization maintains sufficient short-term solvency to minimize risk of project interruption or financial instability.
ii. Stewardship Ratio (Program Expense Ratio): Preference is given to applicants demonstrating that at least 85 percent of total expenditures directly support program outcomes rather than administrative overhead.
iii. Bureaucracy Ceiling (Administrative Expense Ratio): Evaluates whether administrative costs remain within reasonable bounds to ensure that federal funds primarily support programmatic impact.
iv. Revenue Diversification: Assesses whether the organization relies excessively on federal grant funding or maintains a balanced, diversified funding base that supports long-term resilience and reduces financial risk.

Transparency-Based Eligibility and Risk Tiering
ILAB categorizes all applicants into Transparency Tiers based on their legal structure to determine the level of pre-award review and post-award monitoring necessary to ensure fiscal accountability.

i. Tier 1 – High Transparency: Publicly traded corporations (SEC filers) and 501(c)(3) nonprofit organizations that publicly disclose governing documents and financial statements.
ii. Tier 2 – Moderate Transparency: Privately held corporations that disclose ownership and governance information through state level filings only.
iii. Tier 3 – Low Transparency: General partnerships and limited liability companies (LLCs) in which ownership, membership, or controlling interests are not publicly disclosed under state law.
Mandatory Disclosure Requirement: Tier 3 applicants must submit a complete Beneficial Ownership Disclosure and an organizational chart identifying all ownership and control relationships. These disclosures ensure that taxpayer funds are safeguarded, financial risk is minimized, and opaque financial or control structures ("information silos") are not used to obscure accountability, consistent with Administration policy guidance.

Note that Tiered transparency and fiscal KPIs will be applied as part of the 2 CFR 200.208 risk review and may inform special conditions under 2 CFR 200.208 and remedies under 2 CFR 200.339-340.

VI. AWARD ADMINISTRATION INFORMATION

A. AWARD NOTICES

Both applicants selected for award and those not selected will be contacted by USDOL. Selection of an organization as a recipient does not constitute approval of the application as submitted. Before an award is made, USDOL may enter into negotiations about such items as program components, staffing and funding levels, and administrative systems in place to support award implementation. If the negotiations do not result in a mutually acceptable submission, the

Grant Officer reserves the right to terminate the negotiations and decline to fund the application. USDOL reserves the right not to fund any application related to this FOA. USDOL also reserves the right to withdraw the award if activity does not begin upon award and/or as a remedy for non-compliance as described in 2 CFR 200.339-340.

These projects are intended to address forced labor, including forced child labor, in countries including Argentina, Ecuador, El Salvador, Guatemala, Bangladesh, and Malaysia. The FOA states that this work is to be performed in Argentina, Ecuador, El Salvador, Guatemala, Bangladesh, and Malaysia; however, if ILAB and the recipient(s) determine that performance in the identified countries has become impossible as a result of withdrawal of host country government or other required stakeholder support for the project, or for other reasons outside of the project's control, ILAB and the recipient(s) may confer to determine whether it is desirable and feasible to implement the project in a different country. This determination will necessitate findings that: 1) based upon available research, the project, as it is described in this document, is warranted to address forced labor, including forced child labor, in the newly identified country(ies); 2) ILAB and the recipient(s) can obtain support from the new proposed host country government or required stakeholder to implement the proposed project; and 3) the recipient has the capacity to implement the project in the proposed country within the legally permissible timeframe for implementation of the project. If ILAB and the recipient are unable to make these findings and mutually agree on a modification to the award(s) to implement performance in another country, either ILAB or the recipient may seek to have the award suspended or terminated pursuant to the applicable termination clauses.

B. ADMINISTRATIVE AND NATIONAL POLICY REQUIREMENTS

1. General Requirements

Recipients and subrecipients under this FOA shall be subject to the terms outlined in this announcement, the award agreement, the MPG, and any other referenced materials. The MPG provides general management procedures and guidance for recipients of ILAB awards in areas that may not be explicitly detailed in the announcement.

Recipients are subject to applicable U.S. federal laws (including appropriations laws) and regulations and policies (including applicable administrative standards, as provided in VI. B. 3.), Executive Orders, applicable OMB Circulars, and USDOL policies. If, during project implementation, a recipient is found in violation of any of the foregoing, remedies may include modification of the terms of the award; disallowance and recovery of costs; termination of the award; and any other action permitted by law.

For the purposes of this announcement and awards, recipients will be the sole entity with the authority to fulfill the following responsibilities:

- Act as the primary point of contact with USDOL to receive and respond to all inquiries, communications and orders under the project;
- Access funds through the Department of Health and Human Services-Payment Management System;

- Submit to USDOL all deliverables, including all technical and financial reports related to the project;
- Request a revision or amendment of the terms and conditions of award or the Project Document (see MPG for description of Project Document); and
- Work with USDOL to close out the project. Each recipient must comply with all applicable Federal regulations and is individually subject to audit.

Policy of Continuous Alignment and Accountability: In accordance with Administration policy guidance, recipients must maintain ongoing compliance with federal policy, efficiency standards, and transparency requirements throughout the life of the award. USDOL may partially or fully terminate an award if the recipient fails to meet required efficiency benchmarks, submits incomplete or inaccurate transparency disclosures, or no longer aligns with Administration objectives. In addition to remedies for noncompliance, the Department may terminate, in whole or in part, any award pursuant to the terms and conditions if, to the extent authorized by law, the award no longer effectuates program goals or agency priorities, consistent with the parameters of 2 CFR 200.340.

Public Accountability: Recipients expending $1,000,000 or more in federal funds during a fiscal year must publicly post annual financial statements and external audit reports, ensuring transparency and enabling taxpayer oversight of grant-funded activities.

Drawdowns: Recipients may not draw down general project funds without affirmative authorization by USDOL for each drawdown. Each drawdown request must include written, specific justification identifying the costs and period covered.

2. Audits and Attestation Engagements

Recipients must comply with the single audit requirements set forth in Subpart F – Audit Requirements of the Uniform Guidance (2 CFR Part 200) and must comply with the timeframes established in those regulations for the submission of their single audits to the Federal Audit Clearinghouse. Recipients must notify their assigned Grant Officer's Representative of each single audit conducted within the timeframe of the USDOL-funded project at the time it is submitted to the Federal Audit Clearinghouse.

All recipients are subject to project-specific attestation engagements or project-specific audits of the recipients' validation and monitoring processes during the life of the award. Attestation engagements will be conducted in accordance with U.S. Government Auditing Standards and project-specific audits will be conducted in accordance with the International Standards on Auditing, and will include auditors' opinions on (1) compliance with USDOL regulations and the requirements of the award and (2) the accuracy and reliability of the recipient's financial and performance reports.

3. Administrative Standards

The award(s) and subaward(s) made under this FOA will be subject to the following administrative standards:

- Non-Profit Organizations, Educational Institutions, and State, Local and Indian Tribal Governments
  - 2 CFR Part 200 (Administrative Requirements, Cost Principles, and Audit Requirements) and 2 CFR Part 2900 (DOL's Supplement to 2 CFR Part 200)
- For-profit organizations
  - 2 CFR Part 200 (Administrative Requirements and Cost Principles) and 2 CFR Part 2900 (DOL's Supplement to 2 CFR Part 200)
  - 48 CFR Part 31 (Cost Principles)
  - 29 CFR 96.32 The Secretary of Labor is responsible for those not covered by 2 CFR 200 Subpart F (Audit Requirements) as discussed in the MPG
- Non-U.S. organizations, including foreign organizations and public international organizations
  - 2 CFR Part 200 (Administrative Requirements and Cost Principles) and 2 CFR Part 2900 (DOL's Supplement to 2 CFR Part 200)
  - 29 CFR 96.32 The Secretary of Labor is responsible for those not covered by 2 CFR 200 Subpart F (Audit Requirements) as discussed in the MPG
- 29 CFR Part 93 Restrictions on Lobbying
- 29 CFR Part 94 Governmentwide Requirements for Drug-Free Workplace (Financial Assistance)
- 2 CFR Part 180 and 2 CFR Part 2998 Governmentwide Debarment and Suspension
- 29 CFR Part 2, subpart D Equal Treatment in Department of Labor Programs for Religious Organizations, Protection of Religious Liberty of Department of Labor Social Service Providers and Beneficiaries
- 29 CFR Part 31 Nondiscrimination in Federally Assisted Programs of the Department of Labor—Effectuation of Title VI of the Civil Rights Act of 1964
- 29 CFR Part 32 Nondiscrimination on the Basis of Handicap in Programs or Activities Receiving Federal Financial Assistance
- 29 CFR Part 35 Nondiscrimination on the Basis of Age in Programs or Activities Receiving Federal Financial Assistance from the Department of Labor
- 29 CFR Part 36 Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance
- 49 U.S.C. 40118 Fly America Act
- The Department of Labor will follow the procedures outlined in the Department's Freedom of Information Act (FOIA) regulations (29 CFR Part 70). If DOL receives a FOIA request for an application, the procedures in DOL's FOIA regulations for responding to requests for commercial/business information submitted to the government will be followed, as well as all FOIA exemptions and procedures. See generally 5 U.S.C. § 552; 29 CFR Part 70.
- Standard Terms and Conditions of Award

4. Other Legal Requirements

a. Religious Activities

In accordance with 29 CFR 2.32(a), Equal Participation of Faith-Based Organizations, applicants for DOL financial assistance are notified:

1. Faith-based organizations may apply for DOL awards on the same basis as any other organization, subject to the protections and requirements of subpart D of 29 CFR Part 2 and any applicable constitutional and statutory requirements, including 42 U.S.C. 2000bb et seq. DOL will not, in the selection of recipients, discriminate for or against an organization on the basis of the organization's religious character, motives, or affiliation, or lack thereof, or on the basis of conduct that would not be considered grounds to favor or disfavor a similarly situated secular organization.
2. A faith-based organization that participates in this program will retain its independence from the Government and may continue to carry out its mission consistent with religious freedom and conscience protections in Federal law.

b. Lobbying or Fundraising the U.S. Government with Federal Funds
In accordance with Section 18 of the Lobbying Disclosure Act of 1995 (Public Law 104-65) (2 U.S.C. § 1611), non-profit entities incorporated under Internal Revenue Service Code section 501(c) (4) that engage in lobbying activities are not eligible to receive federal funds and grants. No activity, including awareness-raising and advocacy activities, may include fundraising for, or lobbying of, U.S. federal, state or local Governments (see 2 CFR 200.450 for more information).

c. Transparency Act Requirements
Recipients must ensure that they have the necessary processes and systems in place to comply with the reporting requirements of the Federal Funding Accountability and Transparency Act of 2006 (Pub. Law 109-282, as amended by section 6202 of Pub. Law 110-252) (Transparency Act), as follows.

1) Except for those excepted from the Transparency Act under the following sub-paragraphs 1, 2, and 3, recipients must ensure that they have the necessary processes and systems in place to comply with the subaward and executive total compensation reporting requirements of the Transparency Act, should they receive funding.
2) Upon award, recipients will receive detailed information on the reporting requirements of the Transparency Act, as described in 2 CFR Part 170, Appendix A, which can be found at http://edocket.access.gpo.gov/2010/pdf/2010-22705.pdf.

The following types of awards are not subject to the Federal Funding Accountability and Transparency Act.

1) Federal awards to individuals who apply for or receive federal awards as natural persons (i.e., unrelated to any business or non-profit organization he or she may own or operate in his or her name);
2) Federal awards to entities that had a gross income, from all sources, of less than $300,000 in the entities' previous tax year; and
3) Federal awards, if the required reporting would disclose classified information.

d. Safeguarding Data Including Personally Identifiable Information (PII)
Applicants submitting applications in response to this FOA must recognize that confidentiality of PII and other sensitive data is of paramount importance to the Department and must be observed except where disclosure is allowed by the prior written approval of the

Grant Officer or by court order. By submitting an application, applicants are assuring that all data exchanges conducted through or during the course of performance of this award will be conducted in a manner consistent with applicable federal law.

e. Record Retention

Recipients must be prepared to follow federal guidelines on record retention, which require they maintain all records pertaining to award activities for a period of at least three years from the date of submission of the final expenditure report. See 2 CFR 200.334-.338 for more specific information, including information about the start of the record retention period for awards that are renewed quarterly or annually, and when the records must be retained for more than three years.

f. Use of Contracts and Subawards

Recipients must abide by the following definitions of contract, contractor, subaward, and subrecipient:

- **Contract:** *Contract* means, for the purpose of Federal financial assistance, a legal instrument by which a recipient or subrecipient conducts procurement transactions under a Federal award.
- **Contractor**: Contractor means an entity that receives a contract.
- **Subaward:** *Subaward* means an award provided by a pass-through entity to a subrecipient for the subrecipient to contribute to the goals and objectives of the project by carrying out part of a Federal award received by the pass-through entity. It does not include payments to a contractor, beneficiary, or participant. A subaward may be provided through any form of legal agreement consistent with criteria within 2 CFR 200.331, including an agreement the pass-through entity considers a contract.
- **Subrecipient:** Subrecipient means an entity that receives a subaward from a pass-through entity to carry out part of a federal award. The term subrecipient does not include a beneficiary or participant. A subrecipient may also be a recipient of other Federal awards directly from a Federal agency.

For additional information on subrecipient and contractor determinations, see 2 CFR 200.331. Recipients must follow the requirements of 2 CFR 200.331-.333 regarding subrecipient monitoring and management. Also see 2 CFR 200.308(c)(6) regarding prior approval requirements for subawards. When awarding subawards, recipients are required to comply with the governmentwide suspension and debarment requirements found in 2 CFR Part 180 and codified by USDOL at 2 CFR Part 2998, including the exceptions described in 2 CFR 180.215 such as exceptions for direct awards to PIOs.

g. Closeout of Award

Any entity that receives an award under this announcement must close its award with USDOL at the end of the period of performance. Indirect costs for allocated charges to the award are validated at time of closeout using a federally approved NICRA or other applicable rate agreement. These provisions apply to early termination of the contract if such action is taken.

h. Guidance for Grants and Agreements

In accordance with 2 C.F.R. 200, all applicable Federal laws, and relevant Executive guidance, the Federal awarding agency will review and consider applications for funding pursuant to this notice of funding opportunity, including the requirements below:

- Selecting recipients most likely to be successful in delivering results based on the program objectives through an objective process of evaluating Federal award applications (2 C.F.R. 200.205);
- Prohibiting the purchase of certain telecommunication and video surveillance services or equipment in alignment with section 889 of the National Defense Authorization Act of 2019 (Pub. L. No. 115—232) (2 C.F.R. 200.216);
- Providing a preference, to the extent permitted by law, to maximize use of goods, products, and materials produced in the United States (2 C.F.R. 200.322); and
- Terminating agreements in whole or in part to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities (2 C.F.R. 200.340).

5. Other Administrative Standards

Except as specifically provided in this FOA, USDOL acceptance of an application and an award of federal funds to sponsor any programs(s) does not provide a waiver of any award requirements and/or procedures. For example, the OMB Uniform Guidance requires that an entity's procurement procedures ensure that all procurement transactions are conducted, as much as practical, to provide full and open competition. If an application identifies a specific entity to provide goods or services, the award does not provide the justification or basis to sole-source the procurement, i.e., avoid competition.

6. Special Program Requirements

a. Evaluation
USDOL may require that the program or project participate in one or more evaluations of overall performance of USDOL awards and requires the cooperation of the recipient as a condition of award.

b. Performance Objective
Please note that recipients will be held to agreed-upon outcomes and failure to meet those outcomes may result in technical assistance or other intervention by USDOL and may also have a significant impact on decisions about future awards with USDOL.

c. Stakeholder Engagement and Strategy Validation
USDOL recognizes that the situation on the ground may be different from the time that the design was proposed or may evolve quickly. For this reason, award recipients will be required to carry out an in-country Stakeholder Engagement and Strategy Validation with partners and relevant stakeholders to assess, refine, and/or validate the proposed theory of change, design, and strategies of the project. The purpose of the Stakeholder Engagement and Strategy Validation is to understand the operating environment and suitability of project strategies for the current implementing context. This includes considering political and economic factors as they relate to proposed sectors, populations, and strategies. The Stakeholder

Engagement and Strategy Validation should not be a contracted study. Instead, the project team must engage with project stakeholders to review strategies, outcomes, target populations, geographic locations, and activities. The recipient will consult with the USDOL to determine appropriate stakeholders to consult as part of the Stakeholder Engagement and Strategy Validation. The final deliverable is a presentation to USDOL outlining the results of the Stakeholder Engagement and Strategy Validation and identifying any proposed shifts in strategies, geographic areas, deliverables, targets, or activities. Some changes may be subject to approval by the Grant Officer.

C. REPORTING

Recipients must agree to meet USDOL reporting requirements. Recipients must provide the following reports and documents:

1. Quarterly Federal Financial Report (SF 425, FFR)

Award recipients are required to report quarterly financial data on the SF-425 Federal Financial Report (FFR) using the Payment Management System administered by the U.S. Department of Health and Human Services. The reports are due no later than 30 calendar days after the end of each specified reporting quarter. Reporting quarter end dates are March 31, June 30, September 30, and December 31. A final FFR for the last quarter of the period of performance must be submitted no later than 120 calendar days after the quarter ends, or 120 calendar days after the completion of the quarter in which all funds have been expended, whichever comes first. See 2 C.F.R. 200.344. Selected awardees will receive additional reporting instructions within the agreement accompanying their award.

2. Semi-Annual Technical Progress Reports

Recipients must submit a semi-annual technical progress report within 30 days after the end of the months of March and September each calendar year. The report must include information on award activities, performance goals, and milestones. ILAB will provide formal guidance about the data and other information that is required to be collected and reported on either a regular basis or special request basis. ILAB retains the right to require technical progress reports at quarterly intervals. More information on the reports and timeframes for their completion will be included in the cooperative agreement and in the MPG.

Direct Impact Reporting: All technical progress reports must include a "Domestic Economic Impact Narrative." This reporting supplements Uniform Guidance performance reporting and does not alter statutory or regulatory guidance and requirements. This section provides data and linkages between ILAB sponsored international programs for worker rights and protections against child and forced labor which contribute toward American domestic job and wage growth. The reporting provides a picture for "cost-effective solutions" that support domestic national security and economic prosperity consistent with Administration policy guidance.

3. Final Technical Report

Recipients must submit a final technical report within 120 days of the period of performance end date. The final technical report is a stand-alone report that provides a complete and comprehensive summary of the achievements during the life of the project.

4. Indirect Cost Rates

For organizations not using the de minimis rate that have an expired indirect cost rate or a rate not previously approved by the Federal Cognizant Agency (FCA): An indirect cost proposal must be submitted to the FCA within 90 days of award to establish a provisional NICRA. This provisional rate may be effective for a period up to two years until a final NICRA is established.

For all organizations with NICRAs: Indirect cost proposals must be submitted on an annual basis to the FCA to obtain federally approved NICRAs for the life of the award, unless the FCA instructs otherwise. These proposals are based on incurred costs and are due six months after the end of each fiscal year.

5. Closeout Reports

Within 120 days of completion of the project, or its termination, the recipient must provide the following project closeout reports:

- Final Technical Progress Report;
- Final Evaluation Report;
- Government Property Closeout Inventory Certification;
- Government Property Inventory List (due 90 days before end of project)
- Final Quarterly Financial Status report (SF-425);
- Final Closeout Financial Status Report;
- Recipient's Release Form; and
- Recipient's Assignment of Refunds, Rebates and Credits

Additional information may be required for some closeout procedures. More information is available after award.

VII. AGENCY CONTACTS

Applicants who have a specific question about this FOA may contact OGM_ILAB@DOL.gov. Applicants must specifically reference the FOA-ILAB-26-44 in the subject line. This announcement is being made available at https://www.grants.gov/.

VIII. OTHER INFORMATION

A. OMB INFORMATION COLLECTION

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. Public reporting burden for this collection of information is estimated to average 50 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

Send comments about the burden estimated or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, to the attention of the Departmental Clearance Officer, 200 Constitution Avenue NW, Room N1301, Washington, DC 20210. Comments may also be emailed to: DOL_PRA_PUBLIC@dol.gov.

PLEASE DO NOT RETURN YOUR GRANT APPLICATION TO THIS ADDRESS. SEND ONLY COMMENTS ABOUT THE BURDEN CAUSED BY THE COLLECTION OF INFORMATION TO THIS ADDRESS. SEND YOUR GRANT APPLICATION TO THE SPONSORING AGENCY AS SPECIFIED EARLIER IN THIS ANNOUNCEMENT.

This information is being collected for the purpose of awarding a grant. DOL will use the information collected through this “Funding Opportunity Announcement” to ensure that grants are awarded to the applicants best suited to perform the functions of the grant. This information is required to be considered for this grant.

IX. APPENDICES

APPENDIX A: Acronyms

AOR	Authorized Organizational Representative
ARTs	Agreements on Reciprocal Trade
CFR	Code of Federal Regulations
DPMS	Direct Participant Monitoring System
ETA	Employment and Training Administration
FCA	U.S. Federal Cognizant Agency
FFR	Federal Financial Report
FOA	Funding Opportunity Announcement
FOIA	Freedom of Information Act
GO	Grant Officer
GOR	Grant Officer's Representative
ILAB	Bureau of International Labor Affairs
ILO	International Labor Organization
M&E	Monitoring and Evaluation
MPG	Management Procedures and Guidelines
NGOs	Non-governmental Organizations

NICRA	Negotiated Indirect Cost Rate Agreement
OCFT	Office of Child Labor, Forced Labor, and Human Trafficking
OMB	Office of Management and Budget
OTLA	Office of Trade and Labor Affairs
PII	Personally Identifiable Information
PIO	Public International Organization
SAM	System for Award Management
SF	Standard Form
TDA	Trade and Development Act
TPR	Technical Progress Report
TVPRA	Trafficking Victims Protection and Reauthorization Act
UEI	Unique Entity Identifier
USDOL	U.S. Department of Labor
VAT	Value Added Tax

APPENDIX B: Definitions

1. "**Acceptable conditions of work**" encompasses minimum wages, hours of work, and occupational safety and health. See 19 USC 3813(6)(E); Trade Act of 2002, Section 2113(6) (E), available at: 19 USC Ch. 24: BIPARTISAN TRADE PROMOTION AUTHORITY
2. "**Activities**" are defined as the building blocks that lead to outputs and outcomes that, in turn, comprise projects.
3. A "**child**" or "**children**" are individuals under the age of 18 years.
4. "**Child work status**" definitions include the following categories; projects should begin with these basic definitions, and then define them further for project-level definitions, integrating relevant national legislation:
    a. "**Working Children**" are those engaged in any activity to produce goods or to provide services for use by others or for their own use, regardless of whether they are paid or not and whether they work in a formal or informal setting.
    b. Children in "**Child Labor**" are a subset of working children. Child labor includes employment below the minimum age as established in national legislation in countries where the project is being implemented (excluding permissible light work) and the worst forms of child labor, including hazardous unpaid household services. Child labor is thus a narrower concept than "**working children**", as child labor excludes children who do light work for under a permitted number of hours and those who are at or above the minimum age and engage in work not classified as a worst form of child labor.

c. Children in the "**Worst Forms of Child Labor**" refers to those activities described and as understood in ILO Convention 182: Worst Forms of Child Labor, 1999. Under Article 3 of the Convention, the worst forms of child labor comprise—
   1. All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom, and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
   2. The use, procuring, or offering of a child for prostitution, for the production of pornography, or for pornographic purposes;
   3. The use, procuring, or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
   4. Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children.

d. Article 3(d) of ILO Convention 182 defines "**hazardous work**" as "work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children." Countries must determine what type of work is considered hazardous work by law or regulation. ILO Recommendation 190 includes items countries may wish to consider in determining which types of work are hazardous, including
   1. work which exposes children to physical, psychological, or sexual abuse;
   2. work underground, under water, at dangerous heights or in confined spaces;
   3. work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads;
   4. work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health;
   5. work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer.

ILO Recommendation 190 goes on to state in Paragraph 4 that, "[f]or the types of work referred to under Article 3(d) of the Convention and Paragraph 3 above, national laws or regulations or the competent authority could, after consultation with the workers' and employers' organizations concerned, authorize employment or work as from the age of 16 on condition that the health, safety and morals of the children concerned are fully protected, and that the children have received adequate specific instruction or vocational training in the relevant branch of activity."

5. "**Children at high-risk of entering child labor**" refers to children who experience a set of conditions or circumstances (family environment or situation, proximity to economic activities prone to employ children, etc.) under which the child lives or to which the child is exposed that make it more likely that the child will be employed in child labor (e.g., siblings of working children).

6. “**Cooperative agreement**” refers to an award instrument where substantial involvement is anticipated between a federal awarding agency and a non-federal recipient entity during the performance of project activities. The level of monitoring and accountability under a cooperative agreement is less than what is required under a contract, but more than what is required under a regular grant.
7. “**Costs**”

- **“Direct costs”** are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as direct or indirect. See 2 CFR 200.405.
- “**Indirect costs**” mean those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.
- There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the federal award or other final cost objective.
- Therefore, it is essential that each item of cost incurred for the same purpose be treated consistently in like circumstances either as a direct or an indirect cost in order to avoid possible double charging of federal awards. Guidelines for determining direct and indirect costs charged to federal awards are provided in 2 CFR 200 Subpart E-Cost Principles.

8. “**Cost sharing” or “matching**” means the portion of project costs not paid by federal funds. See 2 CFR 300.306 Cost sharing or matching for more information.
9. “**Direct services**” are interventions that include educational and livelihood services provided by the project that can be directly matched to an individual child or adult household member (for livelihood services). (For more information, please see “educational services” and “livelihood services.”)
10. **“Educational services”** refer to formal or non-formal education:

- **“Formal education services”** refer to education provided and/or recognized by the government. Formal education may include government schools, private schools, religious schools, etc. The support of formal education may involve the provision of goods and/or services including school fees, teaching and learning materials, school uniforms, and transportation costs, etc. These goods and/or services are intended to ensure that the child will attend and stay in school.
- **“Non-formal education services”** refer to education provided by any organization or body outside of the formal school system. This education may include literacy, mainstreaming education, accelerated learning, community-based education, bridge courses, remedial education, life skills, etc. Non-formal education services may lead to mainstreaming into formal education or equivalent school certificates.
- **“Vocational education services”** refer to education and/or training related to a specific vocation, trade or occupation. For the purposes of a project(s) funded under this announcement, a child under the age of 18 who receives vocational education services will be counted as having received an educational service. Vocational education services

may also be provided to individuals 18 years of age and older in a household, including older siblings of working or at-risk children under the age of 18, if the provision of such services is intended to reduce the likelihood of child labor for a child in that household as a result of improvements to the household's livelihood. In such cases, the recipient will report this vocational service to ILAB as a livelihood service provided by the project.

11. "**Evaluation**" refers to the systematic collection and analysis of information about the characteristics and outcomes of the program including project conducted under the program, as a basis for making judgements and evaluations regarding the program; improving the program effectiveness; and, informing decisions about current and future programming.
12. **"Evidence"** refers to evaluation findings, performance measurement, data analysis, or other research that provides insights on the effectiveness of the proposed interventions.
13. **"Forced labor"** under international standards (derived from ILO Convention 29) means all work or service which is exacted from any person under the menace of any penalty for its nonperformance and for which the worker does not offer himself voluntarily, and includes indentured labor. According to the 20th International Conference of Labour Statisticians Guidelines, a person is classified as being in forced labor if engaged during a specified reference period in any work that is both under the threat of menace of a penalty and involuntary. Threat and menace of any penalty are the means of coercion used to impose work on a worker against a person's will. Involuntary work refers to any work taking place without the free and informed consent of the worker. Forced child labor is also a worst form of child labor under ILO Convention 182.
14. **"Household"** consists of all persons—related family members and all unrelated persons—who occupy a housing unit and have no other usual address. For the purposes of this project a household must include at least one eligible child who is "at high-risk of entering child labor" or "engaged in child labor."
15. **"Key stakeholders"** can include, but are not limited to: parents, educators, community leaders, national and local policy makers, key opinion leaders, private sector partners, workers and employers organizations, local civil society organizations, religious institutions, think tanks, among others.
16. "Milestone" is a significant achievement that marks a point of progress in accomplishing a task or project. It serves as a point of reference or measurement to assess progress made toward outcomes and the project objective. A milestone may be quantitative or qualitative and must be specific, achievable, and objectively verifiable.

17. "**Monitoring and evaluation**" consists of two basic components —performance monitoring and evaluation— each of which serves distinct purposes. Performance monitoring is the ongoing and systematic tracking of data relating to project activities, outputs, or outcomes and is used to determine whether desired results are occurring and whether implementation is on track. Monitoring often relies on indicators, quantifiable measures of a characteristic or condition of people, institutions, systems or processes that may change over time. Evaluation is the systematic collection and analysis of information about the characteristics and outcomes of programs and projects as a basis for assessment of program effectiveness, overall performance, and/or to inform decisions about current and future programming.
18. "**Occupational safety and health**" encompasses issues related to safe and healthy working environments and efforts to prevent workers from occupational injuries, diseases,

and deaths.
19. "**Outcome**" is defined as the higher-level results or effects achieved by project activities, typically in the medium-term or long-term timeframe of the project.
20. "**Output**" is defined as the direct result of a project activity, or the goods or services produced by the implementation of an activity.
21. "**Programs**" represent a group of projects managed together in order to gain efficiencies on cost, time, technology, etc. ILAB manages foreign assistance projects through two offices: (1) the Office of Child Labor, Forced Labor and Human Trafficking; and (2) the Office of Trade and Labor Affairs. Project-level evaluation results are used to inform other projects within these programs.
22. "**Project**" is defined as a set of complementary activities, over an established timeline and budget, intended to achieve a discrete result. In ILAB, foreign assistance projects are typically carried out through cooperative agreements. ILAB's MPGs state that monitoring and evaluation requirements apply at the project level.
23. "**Project objective**" is defined as the highest-level result that the project intends to achieve.
24. "**Public International Organization (PIO)**" is defined by the International Organizations Immunities Act, 22 U.S.C. § 288, et seq. PIO also is defined by 2 CFR 200.1 as an organization entitled to enjoy privileges, exemptions, and immunities as an international organization under the International Organization Immunities Act (22 U.S.C. 288-288f).
25. "**Subrecipient**" means a non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency.
26. "**Supply chain**" is the chain that comprises all organizations and individuals involved in producing, processing, trading, transporting and/or distributing a product or commodity from its point of origin to the company and/or to the final retailer.
27. "**Sustainability**" is achieved when outcomes and impacts (and sometimes activities) are maintained or even expanded after a project withdraws its resources through the exit process. A sustainability strategy should represent all the elements of project design that take sustainability into account and should increase the likelihood that project outcomes and impacts and (where relevant) activities continue. For the purpose of this FOA, a sustainability strategy is inclusive of an exit strategy which is an explicit plan guiding the process of withdrawing resources and support from beneficiary communities. Sustainability plans are based on assumptions (which may be implicit or explicit) about mechanisms by which project activities and benefits will be sustained; the validity of these assumptions is a determinant of the success of a sustainability plan.