

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	<b>CLASSIFICATION</b> WIA/Planning/Section 166
	<b>CORRESPONDENCE SYMBOL</b> OWI / INAP
	<b>DATE</b> April 28, 2008

**ADVISORY:** TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 25-07

**TO:** ALL SECTION 166 INDIAN AND NATIVE AMERICAN GRANTEES

**FROM:** BRENT R. ORRELL /s/  
Acting Assistant Secretary

**SUBJECT:** Planning Guidance and Instructions for Submission of a Two-Year Strategic Plan for the Indian and Native American (INA), Section 166 program for Program Years (PY) 2008–2009; applying the Native American Talent and Economic Development (NATED) framework.

- Purpose.** To provide planning guidelines and instructions to Native American grantees for the development of a strategic two-year Comprehensive Services Program (CSP) plan and Supplemental Youth Services Program (SYSP) plan for PY 2008-2009. Native American entities designated as a Section 166 grantee for PY 2008-2009 must submit a two-year plan for meeting the employment and training needs of Indians, Alaska Natives, and Native Hawaiians consistent with the purposes described in Section 166 of the Workforce Investment Act (WIA).

The requirement to submit a two-year strategic plan is contingent upon your organization being “Designated” as a Section 166 grantee for PY 2008-2009. Grantees that are not designated as a Section 166 grantee for PY 2008-2009 will not receive Section 166 funds and therefore, there is no need for them to submit a two-year plan. Grant designations will be made in accordance with the procedures described in the Solicitation for Grant Applications (SGA) process which was published in the Federal Register on January 4, 2008 (73 Federal Re. 883).

As indicated in No. 4 below, the Employment and Training Administration (ETA) expects the initial submission of the two-year plan to thoroughly address the guiding questions in Attachment B. Plans that fail to meet these standards will not be approved. Therefore, grantees are encouraged to begin working on their two-year strategic plan as soon as they receive this TEGl.

<b>RESCISSIONS:</b>  None	<b>EXPIRATION DATE:</b>  Continuing
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## 2. References.

- a. Section 166 of the Workforce Investment Act (WIA)  
<http://www.doleta.gov/dinap/cfml/wiapage.cfm>
- b. Regulations implementing the WIA Section 166 Indian and Native American Program
- c. TEGL 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues located at:  
[http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2195](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2195)
- d. TEGL 3-04, ETA's New Strategic Vision for the Delivery of Youth Services Under the Workforce Investment Act located at:  
[http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=1589](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=1589)
- e. TEGL 28-05, The Employment and Training Administration's (ETA's) New Strategic Vision for the Delivery of Youth Services Under the Workforce Investment Act (WIA): "Expanding ETA's Vision for the Delivery of Youth Services under WIA to include Indian and Native American Youth and Youth with Disabilities" located at:  
[http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2224](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2224)
- f. TEGL 3-06, Application Instructions for Program Year (PY) 2006 Workforce Information Core Products and Services Grants: Workforce Information Formula Allocations to States located at:  
[http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2254](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2254)
- g. DINAP Bulletin No. 99-05 Administrative Costs Limitations under the WIA located at: <http://www.doleta.gov/dinap/bulletins/99-05.cfm>
- h. TEGL 13-07, Use of Workforce Investment Act (WIA) Funds for Workforce Development Activities in Support of Economic Development located at:  
[http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2560](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2560)
- i. TEGL 13-06 and TEGL 13-06 Change 1, Instructions for Workforce Investment Act and Wagner-Peyser Act State Planning and Waiver Requests for Years Three and Four of the Strategic Five-Year State Plan (Program Years 2007 and 2008) located at: [http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2298](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2298),  
[http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2327](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2327)

3. **Background.** As stated in the enabling legislation, the purpose of the Section 166 program includes promoting "the economic and social development of Indian, Alaska Native, and Native Hawaiian communities in accordance with the goals and values of such communities" (WIA Section 166 (a)(1)(C)). ETA believes that the objectives of the Section 166 program are in agreement with the Workforce Innovation in Regional Economic Development (WIRED) Initiative, which emphasizes the role of talent development in driving regional economic competitiveness, increased job growth, and new opportunities for all workers.

WIRED integrates workforce investment, education, and economic development systems in support of regional economic competitiveness, and is based on the premise that talent development can drive economic transformation in regional economies. In recognition of the fact that many innovative regional economic development initiatives and partnerships already exist throughout Indian Country, ETA, with this planning guidance, is starting a process of adapting WIRED for INA grantees as the **Native American Talent and Economic Development (NATED)** framework. Integrating the NATED framework into the two-year plans will allow INA grantees to express how they plan to connect their programs to talent development strategies in support of regional economic development efforts including:

- integrating Section 166 activities into broader regional economic and talent development strategies in order to increase the employment and career potential for the Native Americans served by the program;
- tailoring training opportunities to the realities of the local economy in order to facilitate job placement and career advancement; and
- ensuring that economic development projects occurring in their communities provide job opportunities to the local INA labor force.

Therefore, as part of the two-year Comprehensive Service Plan (CSP) for PY 2008-2009, ETA seeks to integrate the principles of NATED into the Section 166 program. Item No. 6 of this TEGP explains the principles of NATED, and Attachment B provides guiding questions on how to address the key components of the NATED initiative in the two-year plan narrative. Grantees will have access to training and examples of promising practices to help them guide their planning.

4. **Quality of Plans and the Approval Process.** In an effort to revitalize and improve the two-year strategic planning process, significant changes have been made to the planning requirements for this period. ETA will require that two-year plans for PY 2008-2009 provide a strategy for meeting the employment and training needs of Indian and Native Americans in accordance with the framework and principles of the NATED framework. In the past, grantees could meet the planning requirements by providing updates to their previous two-year plan. However, this two-year plan will be significantly different and grantees are expected to submit new plans. ETA is also requiring that this two-year plan address in greater detail the services that will be provided to Native Americans and projected outcomes.

For the PY 2008 - 2009 Comprehensive Service Program (CSP) plan, grantees are expected to include the number and types of participants served, as well as the

kinds of services that will be made available. The plan should discuss current and projected labor market demand in their services areas, and identify strategies that will be implemented to meet those changing needs. Moreover, the grantee operating the CSP must address program planning and service delivery approaches, and state how the program intends to collaborate and partner with other organizations to leverage and share limited resources. The CSP grant recipients should demonstrate what “good faith efforts” have been made with Local Boards in establishing Memorandum of Agreements. The plan should also include any barriers the grantee has experienced in attempting to incorporate the One-Stop Career System approach. (Attachment B).

The PY 2008-2009, Supplemental Youth Service Program (SYSP) plans are only required for grantees receiving these funds. Since some of the items cited in the CSP narrative apply to both the CSP and SYSP, grantees need only address the items indicated below, along with the youth goals and calculation worksheet in Attachment E. In PY 2009, grantees will be required to implement the youth common measures, and the SYSP design will need to be modified prior to April 1, 2009.

The SYSP plan should indicate the number of youth to be served, and specifically identify strategies for recruiting and retaining most-in-need and/or at-risk-youth. The SYSP plan must address what services and training are being offered to prepare individuals who are entering the labor market. Plans to reduce dropout rates and improve access to post-secondary education should also be included in the SYSP plan.

Grantees are encouraged to identify alternative learning opportunities in the SYSP plan that prepare youth for post-secondary education. Youth activities that promote cultural identity should be included in the SYSP plan. The plan should demonstrate how the program intends to partner with educational providers to academically prepare students to successfully move into post-secondary education.

Plans that do not fully address the guiding questions in Attachment B or are otherwise incomplete will not be approved. Grantees will be given the opportunity to amend their plan after the initial submission; however, such amendments must be submitted within 15 days from the date the grantee was notified by the Federal Project Officer that the plan will require amendments in order to be approved.

Grantees that have been given an opportunity to amend their plan, and the plan still does not meet the requirements of this TEGP will be determined to have “failed” to

submit a two-year plan. Grantees that fail to submit a two-year plan may be subject to sanctions including the possible defunding and reassignment of the service areas.

- 5. Unspent Funds from Prior Program Years.** In PY 2006, the Native American program had a total of \$55,435,007 in WIA funds available for expenditure. This included \$43,427,182 from the PY 2006 funding appropriation (excluding PL. 102-477 grantees) and \$12,007,825 from unexpended funds from prior program years. Of this amount, the total expenditures at the end of PY 2006 were \$41,546,622 leaving \$13,888,385 in unexpended funds at the end of the program year (June 30, 2007). Given the employment and training needs among Native Americans, we expect unspent funds to be minimal at the end of the program year. WIA regulations at 20 CFR §668.296(d) allow for funds to be reallocated from one INA grantee to another if a grantee has unspent funds in excess of 20 percent of the total funds available at the end of a program year. At the end of PY 2007 (June 30, 2008), ETA will recapture funds from grantees that have carry-over funds in excess of the 20 percent limit and re-distribute the funds to grantees that were under the 20 percent carry-over limit.

In order to maximize expenditures, grantees should factor in their new PY 2008 funding and any unspent carry-over funds from prior program years. In addition, grantees should plan their budgets to provide quality employment and training services to the maximum number of participants.

- 6. Guiding Principles of the Two Year Strategic Plan.** For this two-year strategic plan, grantees must incorporate the principles of NATED in the narrative section of the plan. These principles support the integration of Section 166 programs into regional economic and talent development strategies. Grantees must demonstrate how their program intends to:

- build a demand-driven talent development system that incorporates regional economic development needs and strengths;
- align regional economic and workforce development efforts, including Section 166 program activities;
- enhance an integrated service delivery system that focuses on services rather than programs;
- advance a vision for serving youth most in need (for grantees operating youth programs);

- utilize workforce information and economic data as the foundation for strategic planning and career guidance;
- strengthen partnerships with community- and faith-based organizations;
- utilize an integrated and enhanced performance accountability system.

Each of these principles is described in more detail below.

**A. Demand-Driven Talent Development System that Incorporates Regional Economic Development Needs and Strengths.**

INA grantees have an opportunity to provide their customers with enhanced education and career opportunities as well as to advance regional economic competitiveness by preparing individuals for the jobs in regional economically vital industry sectors. INA grantees must work in partnership with tribal economic development entities, the workforce investment system, the One-Stop Career Center System, business and industry, educators, economic development agencies and other strategic partners in order to: 1) fully understand the available education and career opportunities, 2) most effectively leverage other resources, 3) shape new strategies to ensure Native Americans are considered a valuable labor pool, and 4) overcome their challenges to both education and employment. In so doing, INA grantees will accomplish two important goals. First, INA workers will be trained and placed in industries with career advancement potential. Second, grantees can contribute to local economic growth by supplying critical labor resources to local economic development initiatives, especially those in the start-up phase. As appropriate, INA grantees should:

- a) collaborate with regional strategic partners as part of a talent development system, and not just as a job-training provider,
- b) align post-secondary education for lifelong learning opportunities with the region's talent development strategy,
- c) partner with tribal economic development entities, workforce investment system partners, educators, and regional economic development agencies to provide integrated services rather than operating a siloed system,
- d) align workforce development activities with economic development initiatives in the region,

- e) maintain flexibility in order to take advantage of entrepreneurial and small business opportunities, and
- f) work with education, employer, and economic development partners to gather and analyze a wide array of current and real-time workforce and economic data in order to develop economically-relevant strategies, routinely track economic conditions, measure outcomes, and evaluate local economic competitiveness,

**B. Implement Innovative Workforce Education and Preparation Strategies To Maximize Career Opportunities in High Growth, High Demand Industries and Promote Life-Long Learning.**

As INA grantees shift from job training to talent development, education strategies should focus not only on initial job placement but also on career and educational advancement. Working with education providers to develop the following strategies can help:

- a) grantees receiving youth funding: designing K-12 and alternative education curricula to academically prepare students to successfully move into post-secondary education and to succeed in the workplace. Grantees are encouraged to identify a variety of alternative learning opportunities (multiple education pathways) that prepare youth for post-secondary education.
- b) offer more entry and exit points in adult learning initiatives in recognition of the fact that students need to earn and learn simultaneously, and may need to approach both their education and career progression incrementally. This is particularly essential for incumbent workers who need lifelong education to remain in economically self-sustaining jobs.
- c) developing new education models to support cross-disciplinary learning to meet the expanding range of competencies and skill sets that are needed on the job.
- d) using Registered Apprenticeship as an important talent development strategy and a critical post-secondary education and training opportunity.

**C. Enhancing an Integrated Service Delivery System that Focuses on Services Rather than Programs.**

INA grantees that conduct field operations or provide substantial services are required partners of the One-Stop Career Center delivery systems and should seek to leverage other resources through collaboration with strategic partners and opportunities to enhance service delivery through integration. Rather than operating as a siloed service-delivery system, INAP grantees should “in-good faith” negotiate a Memorandum of Understanding (MOU) with Local Boards regarding the workforce investment system; thus facilitating a seamless system organized around service delivery rather than as separate programs. INAP grantees that do not provide substantial services are encouraged to participate in the One-Stop Career Center Delivery System. Customers should be viewed as consumers of the workforce system rather than of a specific program.

The planning process offers a vehicle for grantees to identify strategies for integration within the broader workforce system and to identify collaborative strategies to enhance service delivery for INAP participants. One mechanism for integrating service delivery is through the MOU with state and/or local workforce investment boards. Consolidation and coordination of employment and training programs is one of the fundamental purposes of the Workforce Investment Act. Accordingly, this two-year strategic plan requires grantees to submit a copy of their MOU, which has been negotiated with the state or Local WIB. Grantees that have not entered into a MOU with their state or local WIB must provide documentation that they have made a good-faith effort to negotiate an MOU with the state or local WIB.

**D. Advancing a Vision for Serving Youth Most in Need.**

Children living in an American Indian Area (AIA) are more likely to live in poverty than those living outside. In 1999, 38 percent of children living in AIAs were living in poverty, compared to 27 percent of those living outside AIAs.<sup>1</sup> As of 2003, close to 23 percent of American Indians and Alaska Natives ages 25 and over had not completed high school compared to 15.4 percent of the general population.<sup>2</sup> The workforce development system needs to address this problem by serving youth most in need, particularly Native American youth, children of incarcerated parents, and youth with disabilities to help them achieve literacy and numeracy gains, attain a high school diploma, and transition to post-secondary

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<sup>1</sup> U.S. Census Bureau, Census 2000, Summary File 4.

<sup>2</sup> U.S. Department of Commerce, Census Bureau, Current Population Survey (CPS), March 2003.

education and career pathways. In an attempt to address this problem, the U.S. Department of Labor has developed a Youth Vision (described in TEGs 3-04 and 28-05 and available on [www.doleta.gov](http://www.doleta.gov)), which proposes that the public workforce system serve the neediest youth: youth aging out of foster care, those involved with the juvenile justice system, children of incarcerated parents, migrant youth, Native American youth and youth with disabilities.

INA grantees receiving youth funds, where possible, should work with other workforce investment system partners, such as the education community, employers, and community organizations, to align resources in order to remove barriers and increase access to post-secondary education. This may include conducting planning sessions with providers to identify existing resources and gaps in services in the community and developing strategies to jointly address these gaps. WIA Section 166 supports the development of academically rigorous education pathways that help youth achieve the competencies necessary for today's climate while acknowledging their different learning styles and constraints.

**E. Utilizing Workforce Information as the Foundation for Strategic Planning and Career Guidance.**

To effectively develop and implement workforce development strategies in the current economy requires a strong understanding of regional economic conditions. Without accurate data about employment prospects, economic development projects on the horizon and education opportunities, the workforce development system and INA grantees will not be able to train and place participants in jobs with strong career pathways that promote lifelong learning. Ideas for expanded data sources and categories of data that can be sought and used to create new knowledge about regional economies were set forth in TEG 3-06, available at [http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2254](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2254)

**F. Strengthening Partnerships with Faith-Based and Community Organizations.**

The U.S. Department of Labor encourages INAP grantees to build and strengthen partnerships with community-and faith-based organizations. In many instances, these organizations are already managing and implementing programs and services that target the population served through WIA, such as job readiness and life skills training or services for populations most in need. Through collaboration, resources can be leveraged to provide a higher quality and more efficient workforce investment system.

## **G. Enhancing Performance Outcomes.**

Performance accountability systems provide a link between services, outcomes, and results achieved. The recently implemented common measures are one critical component of DOL's efforts to facilitate this process. These measures describe in a similar manner the core purposes of all programs operated by the workforce investment system – did people find jobs, did people stay employed, and did their earnings increase. INA grantees are tracking performance outcomes using the Management Information System (MIS) Bear Tracks and are reporting regularly to INAP about program outcomes. As part of this planning process, grantees must complete the worksheet in Attachment C, which will provide ETA with the projected enrollment and outcome goals for the planning period.

- 7. Common Measures (CSP ONLY).** Section 166 grantees began using the common measures performance system in PY 2006 for the CSP (Adult) program only. As stated in previous guidance, baseline data must be collected and evaluated before performance levels can be established for the three common measures, (e.g.) Entered Employment Rate, Retention Rate and Average Earnings). PY 2006 was the first full year to collect performance data on the common measures, and due to the time lag in receiving performance outcomes for the Retention Rate and Average Earnings, ETA does not have sufficient base line data in order to establish individual grantee performance levels for these two measures. However, the INA program has always had an Entered Employment Rate similar to the Common Measures Entered Employment Rate. Therefore, a minimum and recommended level of performance for the Entered Employment Rate has been established for each INA grantee based on the economic conditions in the grantee's service area and the socio-economic characteristics of the participants served in the previous program year. Attachment F provides the minimum and recommended levels of performance for your organization. The SYSP will continue to use the existing 13 participant goals and attainments for PY 2008. ETA anticipates implementing youth common measures beginning in PY 2009. In addition to the common measures, the Office of Management and Budget (OMB) tracks program efficiency for many government programs including the Section 166 program as part of the Government Performance Results Act (GPRA). The GPRA measure determines the efficiency of a program by determining the number of people the program serves given the amount of money the program receives.

ETA has established an efficiency rate (also known as an Average Cost per Customer) for the Section 166 INA program of \$2,300. This rate includes enrolled participants

and self-service customers. In order to meet this goal, the Section 166 program must serve a total of 18,834 customers in PY 2008. This is calculated by dividing the amount of funding the program receives (<sup>3</sup>\$43,318,672) by the efficiency rate (\$2,300) (i.e. \$43,318,672 divided by \$2,300 = 18,834). In addition, ETA has established a secondary efficiency rate for enrolled participants ONLY (i.e. without self-service participants) of \$3,500.

Since each individual grantee contributes to the efficiency rate based on the total number of customers served in the Section 166 program, it is important that each grantee serve a certain number of customers given the amount of funding it receives in order for the overall Section 166 program to meet its efficiency goal. While many grantees have an efficiency/average cost per customer rate below \$2,300, some grantees far exceed this level. Therefore, as part of this two-year strategic plan, a worksheet has been attached (see Attachment C) to assist grantees in determining their efficiency rate. Section II.3 (column C) of the worksheet provides the estimated efficiency rate without self service customers. Section IV.5 (column C) provides the estimated efficiency rate using program participants and self-service customers.

Grantees are not dissuaded from submitting efficiency costs greater than the amounts indicated above. ETA recognizes that a high efficiency rate is not necessarily an indicator that a grantee is inefficient. For example, grantees may invest more money and resources into training participants in high quality/high cost training programs that produce better performance outcomes. Exceeding the above mentioned cost per customer rates does not put a grantee at risk of being sanctioned. However, based on the information provided in the worksheet, ETA may require grantees to submit additional financial information if the efficiency rate in Section II.3 is greater than \$3,500 or the efficiency rate in Section IV.5 is greater than \$2,300.

8. **Period of Performance.** This two-year plan covers the program year April 1, 2008 - March 31, 2010, for the SYSP and July 1, 2008 - June 30, 2010, for the CSP. The grant funds provided in PY 2006 and PY 2007 can be expended during this two-year cycle,

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<sup>3</sup> The total funding allocation in PY 2008 for the Section 166 program is \$52,757,931. However, only funds actually received by Section 166 grantees are considered in calculating the efficiency measure. Therefore, the figure above excludes \$527,579 that is reserved for TAT and \$8,911,680 that is transferred to the Department of Interior as part of Public Law 102-477 Demonstration Act.

except that PY 2006 funds will not be available for expenditure in PY 2009 since all grant funds have a 3-year expiration date. SYSP funds may not be available in grantee sub accounts at the beginning of the PY (April 1<sup>st</sup>), however, grantees may use “carry-over” funds from previous PYs (if available) to implement the SYSP.

Grantees that do not have carry-over funds from previous PYs may use other (non-restricted) resources to begin operating a SYSP and reimburse the program for allowable costs retroactive to April 1, when funds become available in grantee sub accounts. However, grantees should be aware that a formal commitment or obligation of DOL funds will only occur when a Notice of Obligation has been issued by the Grant Officer and the subsequent two-year plan has been approved. Grantees that have not received an official “designation” letter from the Grant Officer re-designating their organization as a Section 166 grantee, or that have been “conditionally” designated, have a greater risk of not being reimbursed for funds that have been advanced to their WIA program.

9. **Administrative Cost Limit.** DINAP Bulletin 99-05 (dated December 10, 1999), provides ETA’s policy on administrative cost limits for each Section 166 program. The policy sets a limit of 15 percent (of the funding year allocation) for administrative costs, with an exception that ETA may approve a higher administrative limit, not to exceed 20 percent, if a grantee can provide acceptable justification for a higher limit. Grantees requesting a rate higher than 15 percent for this two-year plan must include a detailed administrative budget and narrative justification with the two-year plan. The budget should include items such as indirect costs, staff salaries, fringe benefits, rental space, utilities, equipment, supplies, travel, etc. The regulation at 20 CFR 667.220 defines what functions and activities constitute administrative costs subject to the administrative cost limit.

10. **Grievance Procedures, Complaints, and Appeals Processes.** According to the regulations at 20 CFR 667.600, grantees must provide a copy of their grievance procedures to participants and other interested parties. A copy of the grantee’s grievance procedure must be included as an attachment to this two-year plan. At a minimum, the grievance procedure must include: 1) a process for addressing grievances and complaints from participants and other applicable parties; 2) an opportunity for a fair and impartial hearing to be completed by the grantee within 60 days of filing the grievance; and 3) an opportunity to file a grievance with the Department of Labor’s, Indian and Native American Program when a decision is not made within 60 days or either party is dissatisfied with the local hearing decision. Violations under the provisions of WIA section 188 may be directed or mailed to the Director, Civil Rights Center, U.S. Department of Labor, Room N4123, 200 Constitution Avenue, N.W., Washington, D.C. 20210.

11. **Modification of an Approved Plan.** Approved plans may be modified, upon Grant Officer approval, when it is determined that the grantee's current two-year strategy is not meeting the workforce needs of the community or when shifts in the local labor market and/or employer demands (such as job skills training) require a strategy that is significantly different from the approved plan. Modifications are not necessary for changes that do not significantly change the scope and purpose of the approved plan. Grantees should contact their Federal Project Officer when planning to change the scope, purpose or design of their grant to determine whether such changes are significant enough to require prior Grant Officer approval.
12. **Waivers.** WIA Section 166(h)(3) permits waivers of any statutory or regulatory requirement except for those areas cited in Section 668.920. DINAP Bulletin 95-29 provides specific instructions on how to request waivers to the regulations and other program requirements. Grantees may submit a waiver request along with their two-year plan; however, waiver approvals follow a separate process than two-year plan approvals. Therefore, waiver requests should be included in the two-year plan as a separate attachment. Grantees may also submit a request for a waiver at any time during the two-year program period.
13. **Acquisition of Equipment.** Grant Officer approval is required prior to the acquisition of equipment that has a useful life of more than one year and an acquisition cost of \$5,000 or more per unit pursuant to OMB Circulars A-102 [29 CFR 97.33] and A-110 [29 CFR 95.2 (n)]. Approval of equipment is a separate process and cannot be included in the overall approval process of the two-year plan. Grantees must submit requests for the purchase of equipment separately.
14. **PY 2008 Funding Allocations.** The PY 2008 appropriation levels for the Section 166 CSP is \$52,757,931 and \$13,861,042 for the SYSP. Attachments G and H of this TEGL provide the funding allotments for individual grantees. The allotments provided in this TEGL are for planning purposes only and are not an official commitment/obligation by the Department. The allotments do not reflect any changes that may occur as a result of the recent competition process. Grantees will receive an official Notice of Obligation from the Grant Officer upon approval of the two-year plan.
15. **Assurances and Certifications.** Assurances and certifications will be required for this plan. Attachment D provides the assurances and certifications that must be submitted with this plan. Grantees should review the assurances and certifications to be aware of the responsibilities and requirements in administering the Section 166 grant.

16. **Action Required.** The due date for submission of the two-year plan is 60 Days from the date of this guidance. Grantees must submit three copies of the plan with at least one plan having an original signature of an authorized official that matches one of the names on the Grant Signature Sheet (Attachment A).

Grantees must submit the two-year plan postmarked no later than **60 Days from the date of this guidance**, to the address provided below. Please be aware that mail in the Washington D.C. area continues to go through decontamination procedures. Therefore, it is recommended that grantees use an overnight mail service in order to expedite the delivery of the two-year plan. Grantees may also e-mail an electronic version of their plan to [inaplan@egrants.gov](mailto:inaplan@egrants.gov). Please note that e-mailed plans still require grantees to submit an original signature sheet (Attachment A) in the mail or overnight delivery to:

U.S. Department of Labor  
Indian and Native American Programs  
Office of Workforce Investment  
200 Constitution Avenue, N.W.  
FPB Room S-4206  
Washington, D.C. 20210  
**ATTN: MIS-CSP\_DESK**

17. **Inquiries.** Please direct questions to your designated Federal Project Officer provided below.

Evangeline M. Campbell, Program Manager (202) 693 – 3737

Andrea Brown (East)	(202) 693-3736	Duane Hall (Midwest)	(972) 850-4637
Craig Lewis (Midwest)	(202) 693-3384	Guy Suetopka (West)	(415) 625-7988
Dawn Anderson (Midwest)	(202) 693-3745	Si Seciwa (West)	(415) 625-7987

18. **Attachments.** The following attachments and required documents must be included.

Attachment A: Grant Signature Sheet  
Attachment B: Two-Year planning narrative  
Attachment C: Participant Planning, Efficiency and Outcomes Worksheet  
Attachment D: Assurances and Certifications  
Attachment E: SYSP Goals and Calculation Worksheet (SYSP funded Grantees only)  
Required Documents: Grantee Grievance Procedures  
Indirect Cost Rate / Cost Allocation Plan (if applicable)

**Attachments for Information Only: (Do Not Return with Plan)**

Attachment F: CSP Performance Worksheet  
Attachment G: SYS Allotments  
Attachment H: CSP Allotments