

<b>EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210</b>	<b>CLASSIFICATION</b> Unemployment Insurance
	<b>CORRESPONDENCE SYMBOL</b> OUI/DPM
	<b>DATE</b> January 31, 2022

**ADVISORY: UNEMPLOYMENT INSURANCE PROGRAM LETTER NO. 11-22**

**TO:** STATE WORKFORCE AGENCIES

**FROM:** ANGELA HANKS *AH*  
Acting Assistant Secretary

**SUBJECT:** Grant Opportunity for States to Participate in the American Rescue Plan Act (ARPA) Unemployment Insurance (UI) Navigator Program

1. **Purpose.** To notify State Workforce Agencies of the availability of up to \$15 million for selected states to participate in the ARPA UI Navigator Program. These funds will help workers learn about, apply for, and, if eligible, receive UI benefits and related services (*i.e.*, navigate the UI program) and to support state agencies in delivering timely benefits to workers—especially individuals in groups that are historically underserved, marginalized, and adversely affected by persistent poverty and inequality.
2. **Action Requested.** The U.S. Department of Labor’s (Department) Employment and Training Administration (ETA) requests that State Administrators:
  - Review the funding opportunity to determine if the state will apply for funds under this solicitation;
  - Coordinate with appropriate state staff to develop an application under this solicitation;
  - Submit the state grant application by e-mail to the appropriate ETA regional office. The subject line of the e-mail should include the name of the state and the title “ARPA UI Navigator Program.”

**Request for Intent to Apply.** Potential applicants are encouraged to notify the Department of their intent to submit an application for this funding opportunity by emailing the appropriate ETA regional office no later than February 28, 2022. The subject line should read “Intent to Apply – ARPA UI Navigator Program” and the email should identify the entity planning to submit the application for funding. These non-binding notifications will help inform the Department’s planning for the review of applications, as well as award issuance.

**3. Summary and Background.**

- a. Summary – The purpose of the ARPA UI Navigator Program is to help workers learn about, apply for, and, if eligible, receive UI benefits and related services (*i.e.*, navigate

<b>RESCISSIONS</b> None	<b>EXPIRATION DATE</b> Continuing
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the UI program) and to support state agencies in delivering timely benefits to workers—especially workers who have faced obstacles to accessing UI benefits in the past. Selected states will partner with community-based organizations experienced in assisting UI claimants and/or unemployed job seekers to engage in activities that include outreach, training, education, and general assistance with completing applications for unemployment benefits, especially individuals in groups that are historically underserved, marginalized, and adversely affected by persistent poverty and inequality.

The Department is making up to \$15 million available for selected states to participate in the ARPA UI Navigator Program. States may apply for up to \$3 million in funding for a 36-month period of performance, with an anticipated start date of July 1, 2022. Awards made under this Unemployment Insurance Program Letter (UIPL) are subject to the availability of federal funds. In the event that additional funds become available, the Department reserves the right to use such funds to select additional grantees from applications submitted in response to this UIP. No cost sharing or matching is required.

Section 7 of this UIP describes the application criteria and review process for award selections. As indicated in Section 8, selected states will be required to report on the quarterly progress and implementation of the ARPA UI Navigator Program to the Department. As a condition of receiving a grant under this UIP, selected states agree to share any relevant studies, reports, findings and/or audits with their respective ETA regional office. Further, as a condition of receiving a grant under this UIP, states must agree to participate in equity data analytics activities and an evaluation sponsored by the Department, as described in Section 9 of this UIP, including sharing performance and progress reports, data related to the administration of the UI Navigator Program, and individual-level information on participants.

- b. Background – On March 11, 2021, the President signed ARPA into law (Public Law (Pub. L.) 117-2). Section 9032, ARPA, creates a new Section 2118 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act (Pub. L. 116-136), as amended, and provides for a \$2,000,000,000 appropriation to the Secretary of Labor (Secretary) to detect and prevent fraud, to promote equitable access, and to ensure timely payment of benefits to eligible workers with respect to UI programs. Such funds may be used for federal administrative costs; system-wide infrastructure investment and development; and to make grants to states or territories administering UI programs for such purposes, including the establishment of procedures or the building of infrastructure to verify or validate identity, implement federal guidance regarding fraud detection and prevention, and accelerate claims processing or process claims backlogs due to the pandemic.

Funds made available under this UIP are provided in addition to the ARPA Fraud Prevention Grant 2021 made available with UIP No. 22-21, the UI Equity Grant 2021 made available with UIP No. 23-21, the UI Tiger Team Grant 2021 made available with UIP No. 2-22, as well as the funds made available with respect to preventing and detecting fraud and recovering overpayments for the Pandemic Unemployment Assistance (PUA) and Pandemic Emergency Unemployment Compensation (PEUC) programs (*see* UIP Nos. 28-20; 28-20, Change 1; and 28-20, Change 2).

**Reporting and Preventing Fraud.** As a reminder, states must refer allegations which they reasonably believe constitute UI fraud, waste, abuse, mismanagement, or misconduct to the Department’s Office of Inspector General (DOL-OIG). Additionally, states are required to disclose confidential UI information related to the CARES Act, as amended, to DOL-OIG for the purpose of UI fraud investigations and audits for the entire pandemic relief period. See UIPL No. 04-17, Change 1. States should actively and regularly share information about suspected fraud with other state UI agencies and with local, state, and federal law enforcement, in accordance with 20 C.F.R. Part 603.

**Promoting Program Equity.** As states consider additional tools to incorporate into their operations, equitable access to unemployment benefits must be at the forefront of the decision-making process, in line with Executive Order (EO) 13985 issued in January 2021, and UIPL Nos. 02-16 and 02-16, Change 1. At the most fundamental level, equity within the UI program means the provision of UI benefits to eligible workers, including workers who belong to historically underserved communities, in a timely and fair manner, with an application process that is readily accessible to all workers. In the context of fraud management, equitable access means that there are clearly-stated alternatives to digital mechanisms of identity proofing; that the mechanisms used to prove identity or flag for fraud do not contain racial, gender, or other bias; and that data are available to understand the impact, if any, of fraud mitigation on the equitable access to UI benefits for all eligible individuals.

- 4. ARPA UI Navigator Program.** The purpose of the ARPA UI Navigator Program is to help workers learn about, apply for, and, if eligible, receive UI benefits and related services (*i.e.*, navigate the UI program), which includes helping workers who may be victims of identity theft verify their identities when filing UI claims. This program is also intended to support state agencies in delivering timely benefits to all workers, such as people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. This includes addressing disparities in accessing government UI programs facing individuals and communities including, but not limited to, workers who are low paid, Black, Hispanic/Latinx, American Indians, Alaska Native, Asian Americans, Native Hawaiians, Pacific Islanders, Indigenous persons, other persons of color, individuals with disabilities, members of religious minorities, LGBTQI+ persons, individuals with limited English proficiency, women, formerly incarcerated workers, and individuals living in rural areas.

Funding to states will be structured as a cooperative agreement between states and the Department. States will partner with community-based organizations (*i.e.*, sub-grantees) to engage in activities that include outreach, training, education, and general assistance with completing applications for unemployment benefits. States are expected to request and take action on regular reports from community-based organization(s) regarding barriers to more equitable access to the UI program and potential remedies. States may also use this information to inform further equity analysis.

a. **States' Selection of Community-Based Organization(s) with which to Partner.**

Eligible community-based organizations with which states may partner include nonprofit or public entities, which can include labor unions, other entities representing workers, such as worker centers, other community-based organizations, and institutions of higher education. States are encouraged to partner with American Indian/Native American Tribal Governments. Community-based organizations partnering with states for the ARPA UI Navigator Program should be able to demonstrate they: (1) have a successful track record of serving the same or similar communities they expect to provide targeted outreach to; (2) have relationships with unemployed workers likely to be in need of assistance applying for and, if eligible, receiving UI benefits and related services (*i.e.*, navigating the UI program); and (3) have experience in assisting workers to navigate government program(s), especially on UI-related issues, and building the skills they need to effectively represent themselves and their communities in government program(s). Community-based organizations must have significant experience in supporting worker voice through assisting workers in navigating the UI program. Further, these organizations must be able to demonstrate that they have experience working with the community or communities in accessing UI benefits and/or benefits provided through other federal entitlement programs. As part of their application, states and community-based organization partners may propose expanding navigation services to new populations where there is identified need and where partners can develop strategies and relationships for successfully reaching targeted workers.

b. **Roles and Responsibilities.**

i. *Role of State Agencies.* The role of the state agencies with respect to the ARPA UI Navigator Program is to provide all individuals the opportunity to be informed of and to take appropriate action(s) to apply for UI benefits, and, if eligible, maintain their entitlement to UI, and to access UI services without undue burdens or barriers (see Section 303(a)(1) of the Social Security Act, as well as UIPL Nos. 02-16 and 02-16, Change 1). In their applications, state agencies will indicate the frequency of their activities as well as activities performed by community-based organizations, as appropriate. As such, it is incumbent on the state UI agency to:

- ensure that community-based organization(s) do not perform functions that must be performed by merit staff, including following up on matters of individual eligibility referred by community-based organization(s) and resolving such matters in alignment with the UI merit staffing principles (*see* UIPL No. 12-01, Change 2);
- review and address systemic obstacles to the timely receipt of benefits identified by community-based organization(s);
- report on the systemic obstacles to the Department and how the state is addressing such obstacles;
- with assistance and support from DOL, utilize demographic data of UI claims to identify communities with lower benefit reciprocity rates and assist community-based organizations in targeting these communities;

- in collaboration with community-based organizations, coordinate training of state agency staff on how to most effectively reach individuals in groups that are historically underserved, marginalized, and/or adversely affected by persistent poverty and inequality;
  - identify additional regional and local community-based organizations and stakeholders to include as partners to maximize outreach and assistance activities;
  - participate in meetings, conferences, and regular check-ins with other state agencies, navigator grantees in other states, and the Department to share best practices and lessons;
  - coordinate with the Department to prioritize activities and assess progress made in achieving goals of the cooperative agreement; and
  - work with the Department to define and report performance measures and share data to demonstrate ARPA UI Navigator Program activities and impact.
- ii. *Role of the Department.* The Department, in administering the ARPA UI Navigator Program, will:
- coordinate with participating state agencies to ensure they are targeting outreach to, and reaching, people of color and other workers who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. This includes addressing disparities in accessing government UI programs facing individuals and communities including, but not limited to, workers who are low paid, Black, Hispanic/Latinx, American Indians, Alaska Native, Asian Americans, Native Hawaiians, Pacific Islanders, Indigenous persons, other persons of color, individuals with disabilities, members of religious minorities, LGBTQI+ persons, individuals with limited English proficiency, women, formerly incarcerated workers, and individuals living in rural areas;
  - provide resources (including relevant research and data) that may assist state agencies in working with community-based organizations;
  - identify opportunities or strategies for disseminating information, data, and best practices about UI benefits and related UI navigation services across all state agencies;
  - work with state agencies to define performance measures that participating state agencies will be required to report to the Department to demonstrate the impact of ARPA UI Navigator Program activities;
  - coordinate with state recipients to prioritize activities and assess progress made in achieving goals of the cooperative agreement;
  - sponsor independent, external evaluation of the effectiveness and outcomes of the Navigator Program through the Department’s Chief Evaluation Office;
  - use individual-level UI claimant data shared by states with the Department’s Chief Evaluation Office, create equity data indicators that states can use to better design and implement navigation activities in partnership with community-based organizations; and
  - review and provide technical assistance as well as recommendations on planned activities to state agencies.

iii. *Role of Community-based Organization(s)*. Community-based organizations partnering with state UI agencies will:

- conduct targeted outreach activities, which may include promoting awareness of other social safety net programs, to people of color and other workers who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality;
- support the state UI agency in providing all individuals the opportunity to be informed of and take appropriate action(s) to apply for UI benefits, and, if eligible, maintain their entitlement to UI benefits, and to access UI services, without undue burdens or barriers (see Section 303(a)(1) of the Social Security Act, as well as UIPL Nos. 02-16 and 02-16, Change 1);
- raise awareness of UI benefits, including initial eligibility requirements, application procedures, continuing eligibility requirements, and certification requirements;
- provide general assistance to workers in accessing UI benefits as well as refer matters of potential individual eligibility to the state UI agency;
- coordinate with the state UI agency to train UI staff, in alignment with the UI merit staffing principles, on how to most effectively reach specific populations of workers (*see* UIPL 12-01, Change 2);
- assist workers in building the skills they need to be effective advocates for the UI system in their own communities by expanding awareness of the UI program, including eligibility requirements and application processes;<sup>1</sup>
- identify systemic obstacles to the receipt of timely benefits and report those obstacles to state agencies along with any relevant suggestions for overcoming those obstacles;
- participate in meetings, conferences, and regular check-ins with state agencies, Navigator grantees in other states, and the Department to share best practices and lessons; and
- support the state UI agency with an evaluation of the ARPA UI Navigator Program, which may include interviews and surveys of staff and assisted workers, as well as sharing individual-level and aggregate data with the state UI agency in accordance with the data sharing agreement.

Data collected by the community-based organization(s) within the scope of the ARPA UI Navigator program is confidential UI data and cannot be used beyond the scope of the ARPA UI Navigator Program. The community-based organization must have a written agreement in place with the state UI agency that aligns with 20 C.F.R. Part 603.

**5. Funding for States to Participate in the ARPA UI Navigator Program.** This section discusses the amount available to states and allowable uses of funds.

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<sup>1</sup> Use of award funds for lobbying is prohibited by ETA's Grant Terms and Conditions and by the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. Parts 200 and 2900). See the link referenced at the end of section 7.b. of this UIPL.

- a. **Amount Available to States.**<sup>2</sup> The Department is making up to \$15 million available for selected states to participate in the ARPA UI Navigator Program. States may apply for up to \$3 million in funding for a 36-month period of performance, with an anticipated start date of July 1, 2022. Funding to states will be structured as a cooperative agreement between states and the Department. Awards made under this UIPL are subject to the availability of federal funds. In the event that additional funds become available, we reserve the right to use such funds to select additional grantees from applications submitted in response to this UIPL.
- b. **Allowable Uses of Funds.** Funds under this grant must be used to support the purpose of the ARPA UI Navigator Program, which is to help workers learn about, apply for, and, if eligible, receive UI benefits and related services (*i.e.*, navigate the UI program) and to support state agencies in delivering timely benefits to all workers, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. This includes addressing disparities in accessing government UI programs facing individuals and communities including, but not limited to, workers who are low paid, Black, Hispanic/Latinx, American Indians, Alaska Native, Asian Americans, Native Hawaiians, Pacific Islanders, Indigenous persons, other persons of color, individuals with disabilities, members of religious minorities, LGBTQI+ persons, individuals with limited English proficiency, women, formerly incarcerated workers, and individuals living in rural areas.
- c. Selected states will partner with community-based organizations (*i.e.*, sub-grantees) to engage in activities that include outreach, training, education, and general assistance with completing applications for unemployment benefits. There is no administrative cost limit.

These funds may not supplant UI grant funds devoted to other state UI program enforcement or program eligibility review activities. Similarly, these funds must not supplant federal, state, or local funds devoted to providing similar navigation services to UI claimants and/or other unemployed job seekers who have yet to file a claim.

6. **Application Submission Information.** ETA regional offices must receive state applications to participate in the ARPA UI Navigator Program **by e-mail by 4:00 p.m. ET on March 31, 2022**, and must contain the following items:
  - a. A completed Project Narrative (Attachment I);
  - b. An electronically signed copy of a SF-424 - Application for Federal Assistance (OMB Control No. 4040-0004). See Attachment II;
  - c. An SF-424A - Budget Information – Non-Construction Programs (OMB Control No. 4040-0006). See Attachment II; and

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<sup>2</sup> Since Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau do not operate regular UI programs, this grant opportunity is not being made available to these jurisdictions.

- d. A Budget Narrative to explain the projected costs reflected in each line item of the SF-424A, demonstrating how grant funds will be used. See Attachment III for instructions on completing the budget narrative.

If an applicant fails to provide any of the documents described above their application will be deemed non-responsive and not funded.

**7. Application Review Information.** This section discusses application criteria and the review/selection process. We have 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 submissions will be judged. The evaluation criteria are based on the information required in the application as described in Sections 7.a.i. (Project Narrative) and 7.a.ii. (Project Budget). A technical merit review panel, which may include reviewers external to the awarding agency or awarding agency personnel, will carefully evaluate applications against the selection criteria listed below to determine the merit of applications. These criteria are based on the policy goals, priorities, and emphases set forth in this UIPL. Each criterion will be assessed using a color scale: red (poor), yellow (average), green (good). Applications receiving the greatest number of criterion receiving the rating of green/good will be the primary basis for award selection.

- a. **Application Criteria.** Applicants must submit a Project Narrative as part of their application to include the following information.

- i. **Project Narrative.** A rating will be awarded based on the extent to which the application achieves the following criteria under each of the sections (A through D) listed below:

- A. **Statement of Need**

- 1. Detail the population(s) that states are planning to target for outreach, including detailing the current need and potential obstacles to greater UI access in that population(s), including, but not limited to, geographic service areas (if not applying statewide) and language access needs.
      - 2. Explain clearly in both qualitative and quantitative terms the need to address the chosen area(s) of focus by documenting the needs of individuals. Explain the known challenges and barriers that individuals in such areas face accessing UI benefits.
      - 3. Explain clearly how the proposed grant activities are expected to support individuals in groups that are historically underserved, marginalized, and adversely affected by persistent poverty and inequality.

- B. **Organizational Capacity**

- 1. Demonstrate the organizational capacity for the state to fulfill the requirements described in Section 4.b.i. of this UIPL.
      - 2. Identify potential partner organization(s) as described in Section 4.a. of this UIPL and describe the organizational capacity for such

organization(s) to fulfill the requirements described in Section 4.b.iii. of this UIPL.

3. Describe how the state will partner with community-based organization(s) to provide outreach, training, education, and general assistance for individuals applying for or receiving unemployment benefits, including how such activities will be performed in alignment with the UI merit staffing principles (see UIPL No. 12-01, Change 2).
4. Describe how the state will partner with the community-based organization(s) to identify and address systemic access barriers.
5. Demonstrate the grant management capabilities or comparable project management experience of the state and potential partner organization(s).

### **C. Project Design**

1. Describe a coherent and feasible approach for successfully addressing the need/area of focus identified in response to section 7.a.i.A. The design must clearly reflect the Department's goals and provide a timeline reflecting the ability for a quick start-up in a six (6) month period.
2. Describe the activities to take place in each of the following categories, including proposed deliverables, milestones, how participant counts will be tallied, and proposed timelines to indicate a robust project that will support the objectives of the grant initiative.
  - Outreach activities: Demonstrate how the applicant and its potential partner organization(s) will serve the same or similar communities they expect to provide targeted outreach to, including but not limited to how they will leverage relationships with these communities and utilize relevant cultural and linguistic capacity. Also, describe how the applicant and the potential partner organization(s) will support worker voice and assist workers in navigating the UI program, including but not limited to expanding awareness and understanding of eligibility requirements, application processes, work search activities, and reemployment services. Outreach activities must at least include efforts to promote awareness of UI programs and how to apply for them. Outreach activities may include promoting awareness of other social safety net programs.
  - Explain how the applicant and potential partner(s) can effectively connect with the target populations using various methods informed by current barriers to access that are documented in section 7.a.i.A.2.
  - Dissemination activities: Demonstrate how the applicant and its potential partner organization(s) have a comprehensive knowledge of the issues, plus the demonstrated ability to communicate effectively and serve as a trusted intermediary to the targeted participants. Explain clearly varied dissemination methods across multiple platforms, such as social media, in-person or virtual

events, brochures and leaflets, one-on-one consultations, partnerships with other community organizations, etc.

- **Rights and benefits activities:** Describe clearly that the applicant and its partner organization(s) have the ability and experience to help workers know their rights and access benefits with a clear, viable plan to improve access to the UI application and claims process, including benefits take-up and enrollment, and understanding agency questions and decisions. Include with the proposed project a plan to train partner organization(s) and/or workers to become benefits navigators or provide assistance in their own communities to ensure that workers can access their rights and benefits.

**D. Project Sustainability**

1. Demonstrate applicant's commitment to building and sharing a knowledge base of promising practices and challenges faced by the grantees in order to inform future state-level programs.
2. Affirm the state's capacity to participate in evaluations of the Navigator Program and data sharing to support navigation activities, both sponsored and conducted by the Department's Chief Evaluation Office, as described in Section 9 of this UIPL.

ii. **Project Budget.** Applicants must submit the SF-424, SF-424A, and budget narrative as part of their application. Information regarding how to complete these documents is included in Attachment II and Attachment III. A rating will be awarded based on the extent to which the application achieves the following criteria (A through C) listed below:

- A. The SF-424A budget and budget narrative align.
- B. Items included in the budget and budget narrative align with the project as described.
- C. All line items in the budget narrative reflect the level of detail requested in Attachment III.

b. **Application review/selection process.** A technical merit review panel, which may include reviewers external to the awarding agency or awarding agency personnel, will carefully evaluate applications against the above selection criteria to determine the merit of applications. These criteria are based on the policy goals, priorities, and emphases set forth in this UIPL. Each criterion will be assessed using a color scale: red (poor), yellow (average), green (good). Applications receiving the greatest number of criterion receiving the rating of green/good will be the primary basis for award selection. 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 panel's final evaluation or to take into consideration other relevant factors when applicable. Such factors may include the geographic distribution of funds or diversity of program focus areas. The Grant Officer may consider any information that comes to their attention.

The government may elect to award the grant(s) with or without discussion with the applicant. Should a grant be awarded without discussion, the award will be based on the applicant's signature on the SF-424, including electronic signature via E-Authentication on <https://www.grants.gov>, which constitutes a binding offer by the applicant. When projects have been approved, a Notice of Award will be issued to the state as well as the Grant Terms and Conditions. The current standard Federal award terms and conditions for ETA grants are available here: <https://www.dol.gov/agencies/eta/grants/resources>.

8. **Quarterly Reporting Requirements.** States must provide a narrative Quarterly Progress Report (ETA 9178-ARPA) (see Attachment IV) and Quarterly Financial Report (ETA 9130) containing updates on the progress and implementation of each grant project. ETA will use the ETA 9178-ARPA report to track each state's progress in implementing the ARPA UI Navigator Program with the funds provided under this UIPL, ensuring that a state's use of funds is consistent with the allowable use of funds outlined in Section 5.b. of this UIPL. In addition to providing ETA 9178-ARPA reports and ETA 9130 reports, on a quarterly basis, selected states will share any relevant studies, reports, findings and/or audits with their respective ETA regional office. In such submissions to ETA's regional offices, states must include information on any actions taken in response to regular reports from community-based organization(s) regarding barriers to more equitable access to the UI program and potential remedies.
9. **Evaluation and Equity Data Analytics.** As a condition of the grant award, state UI agencies are required to participate in an evaluation and data analytics activities sponsored by the Department. The evaluation will minimally include an implementation and outcomes assessment across grantees. The Department may decide to include an impact analysis within or across grantees. Impact analysis may include randomization of outreach and/or communication strategies to assess effectiveness of particular approaches across underserved worker populations. Applicants will be required to collect data elements to aid the evaluation. Separately, the equity data analytics activities will involve the Department assisting states in the creation of equity indicators for grantees to use in designing navigation activities.

As a condition of award, grantees must agree to enter into data-sharing agreements with the Department and its evaluation contractor under the direction of the Department to: (1) make individual-level records available on UI claims records, including personally identifiable information; (2) provide access to: state staff operating the ARPA UI Navigator Program, program participants, and program records, including but not limited to performance and progress reports; (3) data related to the administration of the ARPA UI Navigator Program; and (4) in general, follow evaluation procedures as specified by the evaluation contractor under the direction of the Department.<sup>3</sup>

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<sup>3</sup> Any research activity undertaken on behalf of the Department will be conducted with full human subjects' protections, including Institutional Review Board (IRB) review. Further, all data-sharing activities will conform to federal data security standards, including those specified in 20 C.F.R. Part 603.

Data provided by the state UI agency to the Department or its contractor as part of evaluation or equity data analytics activities cannot be used beyond the scope of the ARPA UI Navigator Program and will only be used as specified above. The Department must have a written agreement in place with the state UI agency that aligns with 20 C.F.R. Part 603 before it may receive the data.

**10. OMB Information Collection.** In general, under the Paperwork Reduction Act of 1995 (PRA), no person is required to respond to a collection of information unless such collection displays a valid OMB control number. However, Section 2116 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act provides that the PRA does not apply to Subtitle A of Title II of Division A of the CARES Act. ARPA amended Subtitle A of Title II of Division A of the CARES Act by adding section 2118, which provides funding and authority for these UI Navigator grants to states. Thus, the non-application of the PRA applies to information collections required for these UI equity grants.

**11. Inquiries.** Please direct inquiries to the appropriate ETA regional office.

**12. References.**

- American Rescue Plan Act (ARPA), including Title IX, Subtitle A, Crisis Support for Unemployed Workers (Pub. L. 117-2);
- Coronavirus Aid, Relief, and Economic Stimulus (CARES) Act, including Title II, Subtitle A, Relief for Workers Affected by Coronavirus Act (Pub. L. 116-136), as amended;
- 20 C.F.R. Part 603;
- UIPL No. 2-22, *Grant Opportunity to Support States Following a Consultative Assessment for Fraud Detection and Prevention, Promoting Equitable Access, and Ensuring the Timely Payment of Benefits, including Backlog Reduction, for all Unemployment Compensation (UC) Programs*, issued November 2, 2021, [https://wdr.doleta.gov/directives/corr\\_doc.cfm?docn=6683](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=6683);
- UIPL No. 23-21, *Grant Opportunity for Promoting Equitable Access to Unemployment Compensation (UC) Programs*, issued August 17, 2021, [https://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=7400](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7400);
- UIPL No. 22-21, *Grant Opportunity to Support States with Fraud Detection and Prevention, Including Identity Verification and Overpayment Recovery Activities, in All Unemployment Compensation (UC) Programs*, issued August 11, 2021, [https://wdr.doleta.gov/directives/corr\\_doc.cfm?docn=4240](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=4240);
- UIPL No. 28-20, Change 2, *Additional Funding to Assist with Strengthening Fraud Detection and Prevention Efforts and the Recovery of Overpayments in the Pandemic Unemployment Assistance (PUA) and Pandemic Emergency Unemployment Compensation (PEUC) Programs, as well as Guidance on Processes for Combatting Identity Fraud*, issued August 11, 2021, [https://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=7207](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7207);
- UIPL No. 28-20, Change 1, *Additional Funding for Identity Verification or Verification of Pandemic Unemployment Assistance (PUA) Claimants and Funding to Assist with Efforts to Prevent and Detect Fraud and Identity Theft as well as Recover Fraud*

*Overpayments in the PUA and Pandemic Emergency Unemployment Compensation (PEUC) Programs*, issued January 15, 2021,

[https://wdr.doleta.gov/directives/corr\\_doc.cfm?docn=9897](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=9897);

- UIPL No. 28-20, *Addressing Fraud in the Unemployment Insurance (UI) System and Providing States with Funding to Assist with Efforts to Prevent and Detect Fraud and Identity Theft and Recover Fraud Overpayments in the Pandemic Unemployment Assistance (PUA) and Pandemic Emergency Unemployment Compensation (PEUC) Programs*, issued August 31, 2020,  
[https://wdr.doleta.gov/directives/corr\\_doc.cfm?docn=8044](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=8044);
- UIPL No. 04-17, Change 1, *Requirement for States to Refer Allegations of Unemployment Compensation (UC) Fraud, Waste, Abuse, Mismanagement, or Misconduct to the Department of Labor's (Department) Office of Inspector General's (DOL-OIG) and to Disclose Information Related to the Coronavirus Aid, Relief, and Economic Security (CARES) Act to DOL-OIG for Purposes of UC Fraud Investigations and Audits*, issued August 3, 2021,  
[https://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=5817](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5817);
- UIPL No. 02-16, Change 1, *State Responsibilities for Ensuring Access to Unemployment Insurance Benefits, Services, and Information*, issued May 11, 2020,  
[https://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=5491](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5491);
- UIPL No. 02-16, *State Responsibilities for Ensuring Access to Unemployment Insurance Benefits*, issued October 1, 2015,  
[https://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=4233](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=4233); and
- UIPL No. 12-01, Change 2, *States' Ability to Exercise Flexibility in Staffing Models for the Performance of Certain Unemployment Compensation (UC) Administrative Activities*, issued January 8, 2021,  
[https://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=8998](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=8998).

### **13. Attachment(s).**

- Attachment I: Suggested Application Project Narrative
- Attachment II: Instructions to Complete the SF-424 and SF-424A
- Attachment III: General Instructions for the Completion of a Budget Information Narrative
- Attachment IV: ETA 9178-ARPA Quarterly Narrative Progress Report

**Suggested Application Project Narrative**

**Instructions:** States must submit a project narrative using the suggested format below. This document is to be combined in a single grant application package along with a completed SF-424, an SF-424A, and Budget Narrative covering all projects. Refer to Section 7.a. of this UIPL for additional instruction. A rating will be awarded based on the extent to which the application achieves the following criteria under each of the sections (A through D) listed below:

**A. Statement of Need**

1. Detail the population(s) that states are planning to target for outreach, including detailing the current need and potential obstacles to greater UI access in that population(s), including, but not limited to, geographic service areas (if not applying statewide) and language access needs.
2. Explain clearly in both qualitative and quantitative terms the need to address the chosen area(s) of focus by documenting the needs of individuals. Explain the known challenges and barriers that individuals in such areas face accessing UI benefits.
3. Explain clearly how the proposed grant activities are expected to support individuals in groups that are historically underserved, marginalized, and adversely affected by persistent poverty and inequality.

**B. Organizational Capacity**

1. Demonstrate the organizational capacity for the state to fulfill the requirements described in Section 4.b.i. of this UIPL.
2. Identify potential partner organization(s) as described in Section 4.a. of this UIPL and describe the organizational capacity for such organization(s) to fulfill the requirements described in Section 4.b.iii. of this UIPL.
3. Describe how the state will partner with community-based organization(s) to provide outreach, training, education, and general assistance for individuals applying for or receiving unemployment benefits, including how such activities will be performed in alignment with the UI merit staffing principles (see UIPL No. 12-01, Change 2).
4. Describe how the state will partner with the community-based organization(s) to identify and address systemic access barriers.
5. Demonstrate the grant management capabilities or comparable project management experience of the state and potential partner organization(s).

**C. Project Design**

1. Describe a coherent and feasible approach for successfully addressing the need/area of focus identified in response to section 7.a.i.A. The design must clearly reflect the Department's goals and provide a timeline reflecting the ability for a quick start-up in a six (6) month period.
2. Describe the activities to take place in each of the following categories, including proposed deliverables, milestones, how participant counts will

be tallied, and proposed timelines to indicate a robust project that will support the objectives of the grant initiative.

- Outreach activities: Demonstrate how the applicant and its potential partner organization(s) will serve the same or similar communities they expect to provide targeted outreach to, including but not limited to how they will leverage relationships with these communities and utilize relevant cultural and linguistic capacity. Also, describe how the applicant and the potential partner organization(s) will support worker voice and assist workers in navigating the UI program, including but not limited to expanding awareness and understanding of eligibility requirements, application processes, work search activities, and reemployment services. Outreach activities must at least include efforts to promote awareness of UI programs and how to apply for them. Outreach activities may include promoting awareness of other social safety net programs.
- Explain how the applicant and potential partner(s) can effectively connect with the target populations using various methods informed by current barriers to access that are documented in section 7.a.i.A.2.
- Dissemination activities: Demonstrate how the applicant and its potential partner organization(s) have a comprehensive knowledge of the issues, plus the demonstrated ability to communicate effectively and serve as a trusted intermediary to the targeted participants. Explain clearly varied dissemination methods across multiple platforms, such as social media, in-person or virtual events, brochures and leaflets, one-on-one consultations, partnerships with other community organizations, etc.
- Rights and benefits activities: Describe clearly that the applicant and its partner organization(s) have the ability and experience to help workers know their rights and access benefits with a clear, viable plan to improve access to the UI application and claims process, including benefits take-up and enrollment, and understanding agency questions and decisions. Include with the proposed project a plan to train partner organization(s) and/or workers to become benefits navigators or provide assistance in their own communities to ensure that workers can access their rights and benefits.

#### **D. Project Sustainability**

1. Demonstrate applicant's commitment to building and sharing a knowledge base of promising practices and challenges faced by the grantees in order to inform future state-level programs.
2. Affirm the state's capacity to participate in evaluations of the Navigator Program and data sharing to support navigation activities, both sponsored

and conducted by the Department's Chief Evaluation Office, as described in Section 9 of this UIPL.

**Instructions for Completing the SF-424 and SF-424A**

I. Application for Federal Assistance (SF-424)

Use the current version of the form for submission. Expired forms will not be accepted. SF-424, Expiration Date 12/31/2022, Office of Management and Budget (OMB) Control No. 4040-0004 (Grants.gov).

[http://apply07.grants.gov/apply/forms/sample/SF424\\_3\\_0-V3.0.pdf](http://apply07.grants.gov/apply/forms/sample/SF424_3_0-V3.0.pdf)

**Section # 8, APPLICANT INFORMATION:**

- **Legal Name:** The legal name must match the name submitted with the System for Award Management (SAM). Please refer to instructions at <https://www.sam.gov/SAM/>.
- **Employer/Tax Identification Number (EIN/TIN):** Input your correct 9-digit EIN and ensure that it is recorded within SAM.
- **Organizational DUNS:** All applicants for Federal grant and funding opportunities are required to have a 9-digit Data Universal Numbering System (D-U-N-S®) number, and must supply their D-U-N-S® number on the SF-424. Please ensure that your state is registered with the SAM. Instructions for registering with SAM can be found at <https://www.sam.gov>. Additionally, the state 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, there is a requirement to review and update the registration at least every 12 months from the date of initial registration or subsequently update the information in the SAM database to ensure it is current, accurate, and complete. Failure to register with SAM and maintain an active account will result in a rejection of your submission.
- **Address:** Input your complete address including Zipcode+4; Example: 20110-831. For lookup, use link at [https://tools.usps.com/go/ZipLookupAction\\_input](https://tools.usps.com/go/ZipLookupAction_input).
- **Organizational Unit:** Input appropriate Department Name and Division Name, if applicable.
- **Name and contact information of person to be contacted on matters involving this application:** Provide complete and accurate contact information including telephone number and email address for the point of contact.

**Section # 9, Type of Applicant 1:** Select Applicant Type: Input “State Government”.

**Section # 10, Name of the Federal Agency:** Input “Employment and Training Administration”.

**Section # 11, Catalog of Federal Domestic Assistance Number:** Input “17.225”; **CFDA Title:** Input “Unemployment Insurance”.

**Section # 12, Funding Opportunity Number and Title:** Input “ARPA Navigator

Grant”.

**Section # 13, Competition Identification Number:** Leave Blank.

**Section # 14, Areas Affected by Project:** Input the place of performance for the project implementation; Example “NY” for New York.

**Section # 15, Descriptive Title of Applicant’s Project:** Input “ARPA Navigator Grant 2021”.

**Section # 16, Congressional Districts of:**

- a. Applicant: Input the Congressional District of your home office. For lookup, use link at [www.house.gov](http://www.house.gov) with Zipcode + 4
- b. Program/Project: Input the Congressional District where the project work is performed. If it is the same place as your home office, input the congressional district for your home office. For lookup, use link at [www.house.gov](http://www.house.gov) with Zipcode+4

**Section # 17, Proposed Project Dates**

- a. Start Date: Input a valid start date for the project (earliest start date will be July 1, 2022)
- b. End Date: Input a valid end date for the project (June 30, 2025)

**Section # 18, Estimated Funding (\$):**

Input the applicable funding allotment as listed for your state in Attachment I. Ensure that the funding requested matches the TOTALS in Section B – Budget Categories of the SF424A.

**Section #s 19 – 20:** Complete as per instructions for Form SF-424.

**Section # 21, Authorized Representative:** Please select the “I AGREE” check box and provide complete information for your authorized signatory including contact information such as telephone number and email address. If your Authorized Representative has changed from your previous application submission for this program, please include a letter from higher-level leadership authorizing the new signatory for the application submission.

**Remember to have the SF-424 signed and dated by the Authorized Representative**

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

- Use the current version of the form for the submission. Expired forms will not be accepted. SF 424A, Expiration Date 02/28/2022, OMB Control No. 4040-0006 <https://apply07.grants.gov/apply/forms/sample/SF424A-V1.0.pdf>
- Section B – Budget Categories: Ensure that TOTALS in Section 6, Object Class Categories matches the Estimated Funding requested in the SF-424.

- If indirect charges are specified in Section 6, Object Class Categories, then include either:
  - (a) The approved indirect cost rate with a copy of the Negotiated Indirect Cost Rate Agreement (NICRA), a description of the base used to calculate indirect costs along with the amount of the base, and the total indirect costs requested; **OR**
  - (b) For those applicant states that meet the requirements to use the 10 percent de minimis rate as described in 2 CFR 200.414(f), a description of the modified total direct cost base (see 2 CFR 200.1 for definition) used in the calculation along with the amount of the base, and the total indirect costs requested based on the 10 percent de minimis rate.

**General Instructions for the Completion of a Budget  
Information Narrative**

The Budget Information Narrative must include the following information:

- Each line item on the SF-424A must be explained, and the cost provided for each. Each line item on the SF-424A pertains to projected costs at the recipient level, with the exception of the Contractual line item. Contractual should include costs at the project operator level.
- The total for each line item on the Budget Information Narrative must match the total for each line item on the SF-424A.
- If a grant modification requests to realign the budget, the narrative must address the reason for the change in each affected line item.

1. **Personnel** – List all staff positions by title. State the annual salary of each person, the percentage of each person’s time devoted to the project, the amount of each person’s salary funded by the grant, and the total personnel cost for the period of performance.

2. **Fringe Benefits** – Provide the overall fringe benefit percentage which reflects the recipient’s organizational fringe, and list the components included, such as health insurance, FICA, retirement, etc. Provide the fringe benefit calculation for each staff position listed under the Personnel line item.

3. **Travel** – Specify the type and purpose of the travel, the number of travelers, approximate mileage, per diem rates, estimated number of trips, and other associated travel costs.

4. **Equipment** – Identify each item of equipment to be purchased. Equipment has an estimated acquisition cost per unit of \$5,000 or more, and a useful life of one year or more. List the quantity and unit cost per item. Items with a unit cost of less than \$5,000 are classified as supplies.

5. **Supplies** – Supplies include all tangible personal property other than “equipment.” Identify supply categories (e.g. office supplies, cell phones, personal tools for disaster clean-up, etc.). List the cost associated with each category.

6. **Contractual** –

- Identify each project operator and the funding allocation made to the organization.
- Provide total projected costs (NOT for each project operator but as a lump sum) for each of the following categories: Administrative Costs, Career Services, Supportive Services, Training (itemize work-based training and classroom training), and Other Costs (itemized).

7. **Construction** – Construction costs are not allowed and this line must be left as zero. Minor alterations to adjust an existing space for grant activities (such as a classroom alteration) may be allowable. DOL does not consider this as construction and the costs must be shown on other appropriate lines such as Contractual.

8. **Other** – List each item in sufficient detail for DOL to determine whether the costs are reasonable or allowable. Costs included under Other should not fit into any other line item category.

9. **Indirect Charges** – If charging indirect costs to the grant, this line item must be populated. Include the current approved Negotiated Indirect Cost Rate Agreement, signed by the Federal cognizant agency, as an attachment to the grant application.

**Attachment IV to UIPL No. 11-22**

**Form ETA 9178-ARPA**

U.S. Department of Labor (DOL)  
 Employment and Training Administration  
 Form ETA 9178-ARPA

OMB No. N/A<sup>4</sup>  
 Expiration Date: N/A

**Quarterly Narrative Progress Report  
 American Rescue Plan Act (ARPA) Grants**

General Information							
<b>State Name:</b>		<b>Grant Number:</b>		<b>Report Quarter Ending:</b>		<b>Date of Submission:</b>	
<b>Project Name:</b>				<b>UIPL Number:</b>			
Project Contact Information							
<b>Name:</b>				<b>Agency:</b>			
<b>Title</b>				<b>Address:</b>			
<b>Phone:</b>		<b>Ext:</b>		<b>City:</b>			
<b>E-Mail:</b>				<b>State:</b>		<b>Zip Code:</b>	

**Project Report**

**A. Summary of Project**

*Please limit your response to 1000 characters or less.*

States must use this section to provide a detailed executive summary of the project/activity/solution (project). Each funded project will have its own separate quarterly progress report (ETA 9178-ARPA) through the quarter the project ends. States must use this section to provide a short summary of the project’s purpose. This summary should only change during the life of the grant if the state has received an approved modification. Modifications only apply to grants that require a full application.

**B. Timeline for Grant Activities and Milestones or Deliverables**

*Please limit your response to 1000 characters or less.*

States must use this section to provide the timelines for and the progress in completing grant activities, key milestones, and deliverables for this quarter. A timeline must still be developed for all project activities. The timeline must provide a project flow that includes start and end dates, schedule of activities, and projected outcomes. In order to reap the most benefit from the timeline, the timeline must be updated each quarter noting the actual date of completion as each activity is accomplished. Items to incorporate in the timeline include: project goals, milestones, special events, important deadlines and deliverables.

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<sup>4</sup> Refer to section 2116(a) of P.L. 116-136, the Coronavirus Aid, Relief, and Economic Security Act, March 27, 2020.

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**C. Project Implementation and Funding Status**

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*Please limit your response to 1000 characters or less.*

States must use this section to provide a description of the implementation of key activities and/or project status for the current quarter. Place an ‘X’ in one of the four check-boxes provided below to provide an assessment of implementation progress. The assessment must be supported by the status narrative noting if the project is on schedule, behind schedule, ahead of schedule, or complete this quarter. Once the project is marked as complete this quarter, the state is no longer required to submit an ETA 9178-ARPA report for the project. In addition, please provide the funding status for this project for the end of the quarter, including the total project funding, total obligated, funding balance, and time remaining to expend funds/expenditure target.

<b>State Self-Assessment:</b>	<b>On Schedule</b>	<b>Behind Schedule</b>	<b>Ahead of Schedule</b>	<b>Complete this Quarter</b>
<b>Total Project Funding</b>	<b>Total Obligated</b>		<b>Funding Balance</b>	<b>Expenditure Target</b>

**D. Project Challenges, Risk Mitigation Efforts/Modification Requests, and Technical Assistance Needs**

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*Please limit your response to 1500 characters or less.*

States must use this section to summarize any significant challenges to project implementation encountered during the quarter, and describe any risk mitigation efforts or actions taken to address the identified challenges. In addition, a status update must be provided on the resolution of challenges identified in previous quarters. This section should also include any questions you have for DOL and note any identified needs for technical assistance from DOL or others. The narrative must also indicate whether the grantee is requesting a modification to any project strategies and how the modification request changes the original project proposal. If a modification has been requested, the narrative must also indicate the status of the modification request. Modifications only apply to grants that require a full application. If states have nothing to report, that should be specified.

**E. Best Practices, Promising New Strategies and Success Stories**

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*Please limit your response to 1000 characters or less.*

States must use this section to describe promising approaches, innovative processes, or grant success stories. States must also describe any lessons learned and how those lessons learned will be implemented. Throughout the implementation of the project, states may discover new strategies that emerge as a result of data-driven continuous improvement. As progress is made with a new and promising strategy, or as data is gathered to support it, states must document the progress and data each quarter. If states have nothing to report, that must be specified.

**F. Additional Outcome Information**

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*Please limit your response to 1000 characters or less.*

This section requires states to report grant-specific outcomes not captured in other sections of the quarterly narrative progress report, including, but not limited to, outcomes measuring equitable service delivery, outcomes measuring fraud detection and prevention, outcomes measuring backlog reduction, specific outcomes included in the grant application.

Certification	
<b>Name of Grantee Certifying Official:</b>	
<b>Phone:</b>	
<b>E-Mail Address:</b>	

## Instructions to Complete ETA 9178-ARPA

### **Contact Information:**

This section is to provide the contact information (*i.e.*, Name, Title, Address, etc.) for the state official who is responsible for the day-to-day operation and implementation of the project. This may be a different person than the certifying official.

### **Certification:**

- **Name of Certifying Official**  
Use this section to provide the name of the state official who is certifying submission of the report to the U.S. Department of Labor (Department).
- **Telephone Number**  
Provide the area code and telephone number ((###) ###-####) of the authorized state official.
- **Email Address**  
Provide the email address of the authorized state official.

### **General Instructions**

States receiving ARPA Grant Funds are required to submit quarterly progress reports to the Department's Employment and Training Administration (ETA) in order to comply with the reporting and record keeping requirements of these funds. Each state recipient of funds must submit a narrative Quarterly Progress Report (QPR) containing updates on the progress and implementation of the project(s) undertaken as a result of the funding.

### **Report Form and Instructions**

The QPR provides narrative updates on the implementation of project(s) undertaken as a result of the funding and the status of each project per quarter.

### **Due Dates**

All quarterly reports are due to ETA no later than 45 days after the end of each reporting quarter. The table below shows the expected due dates for each reporting quarter.

Reporting Quarters	Due Dates
October 1 <sup>st</sup> – December 31 <sup>st</sup>	February 14 <sup>th</sup>
January 1 <sup>st</sup> – March 31 <sup>st</sup>	May 15 <sup>th</sup>
April 1 <sup>st</sup> – June 30 <sup>th</sup>	August 14 <sup>th</sup>
July 1 <sup>st</sup> – September 30 <sup>th</sup>	November 14 <sup>th</sup>

Should the due date of the report fall on a Saturday, Sunday, or holiday, the report is due the previous business day.

### **Submission Procedures**

Information contained in the quarterly report (ETA 9178-ARPA) must be submitted by email directly to the ETA regional office. An ETA Federal Project Officer will review and accept the report within 30 days of receipt.

OMB Approval. Section 2116(a) of the CARES Act, 5 U.S.C. 9032(a), states that “Chapter 35 of Title 44, United States Code, (commonly referred to as the ‘Paperwork Reduction Act of 1995’) shall not apply to the provisions of, and the amendments made by, this subtitle.” As the OMB approval process is waived for these reporting instructions, these instructions should be considered final.