

# **The Department of Homeland Security (DHS)**

## **Notice of Funding Opportunity (NOFO)**

### **Fiscal Year 2025 National Incident Management System (NIMS)**

Fraud, waste, abuse, mismanagement, and other criminal or noncriminal misconduct related to this program may be reported to the Office of Inspector General (OIG) Hotline. The toll-free numbers to call are 1 (800) 323-8603 and TTY 1 (844) 889-4357.

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**1. Basic Information**

<b>A. Agency Name</b>	U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA)
<b>B. NOFO Title</b>	Fiscal Year 2025 National Incident Management System (NIMS)
<b>C. Announcement Type</b>	Initial
<b>D. Funding Opportunity Number</b>	DHS-25- NPD-107-00-01
<b>E. Assistance Listing Number</b>	97. 107
<b>F. Expected Total Funding</b>	\$2,250,000.00
<b>G. Anticipated Number of Awards</b>	1 award
<b>H. Expected Award Range</b>	\$2,250,000.00
<b>I. Projected Application Start Date</b>	07/28/2025 10:00 a.m. Eastern Time (ET)
<b>J. Projected Application End Date</b>	08/11/2025 11:59 p.m. Eastern Time (ET)
<b>K. Anticipated Funding Selection Date</b>	No later than 08/25/2025
<b>L. Anticipated Award Date</b>	No later than 08/27/2025
<b>M. Projected Period of Performance Start Date</b>	09/04/2025
<b>N. Projected Period of Performance End Date</b>	09/03/2026
<b>O. Executive Summary</b>	The purpose of the NIMS Cooperative Agreement is to support the Emergency Management Assistance Compact (EMAC), which is a congressionally ratified mutual aid compact that defines a state-to-

	state system for sharing resources across state lines during an emergency or disaster.
<b>P. Agency Contact</b>	<p><b>a. <i>Program Office Contact</i></b>  Charles Evans, Program Officer  FEMA/National Integration Center  400 C Street SW Washington, DC 20024  Phone: 202-655-8567  Office Hours: 8:00 AM to 5:30 PM ET  Email: <a href="mailto:charles.evanssr@fema.dhs.gov">charles.evanssr@fema.dhs.gov</a></p> <p><b>b. <i>FEMA Grants News</i></b>  This channel provides general information on all FEMA grant programs and maintains a comprehensive database containing key personnel contact information at the federal, state, and local levels. FEMA Grants News Team is reachable at <a href="mailto:fema-grants-news@fema.dhs.gov">fema-grants-news@fema.dhs.gov</a> OR (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET.</p> <p><b>c. <i>Grant Programs Directorate (GPD) Award Administration Division</i></b>  GPD’s Award Administration Division (AAD) provides support regarding financial matters and budgetary technical assistance. AAD can be contacted at <a href="mailto:ASK-GMD@fema.dhs.gov">ASK-GMD@fema.dhs.gov</a>.</p> <p><b>d. <i>FEMA Regional Offices</i></b>  FEMA Regional Offices also may provide fiscal support, including pre- and post-award administration and technical assistance. FEMA Regional Office contact information is available at <a href="https://www.fema.gov/fema-regional-contacts">https://www.fema.gov/fema-regional-contacts</a>.</p> <p><b>e. <i>Civil Rights</i></b>  Consistent with Executive Order 14173, Ending Illegal Discrimination &amp; Restoring Merit-Based Opportunity, the FEMA Office of Civil Rights is responsible for ensuring compliance with and enforcement of federal civil rights obligations in connection with programs and services conducted by FEMA. They are reachable at FEMA-CivilRightsOffice@fema.dhs.gov.</p> <p><b>f. <i>Environmental Planning and Historic Preservation</i></b>  The FEMA Office of Environmental Planning and Historic Preservation (OEHP) provides guidance and information about the EHP review process to FEMA programs and recipients and subrecipients. Send any inquiries regarding compliance for FEMA grant projects under this NOFO to <a href="mailto:FEMA-OEHP-NOFOQuestions@fema.dhs.gov">FEMA-OEHP-NOFOQuestions@fema.dhs.gov</a>.</p> <p><b>g. <i>Payment and Reporting System</i></b></p>

	<p>FEMA uses the <u>Payment and Reporting System (PARS)</u> for financial reporting, invoicing, and tracking payments. The Direct Deposit/Electronic Funds Transfer (DD/EFT) method of payment is used for recipients. For any questions about the system, contact the Customer Service Center at (866) 927-5646 or ask- <a href="mailto:GMD@fema.dhs.gov">GMD@fema.dhs.gov</a>.</p> <p><b>h. <i>FEMA GO</i></b> For technical assistance with the FEMA GO system, please contact the FEMA GO Helpdesk at <a href="mailto:femago@fema.dhs.gov">femago@fema.dhs.gov</a> or (877) 585-3242, Monday through Friday, 9:00 AM – 6:00 PM ET.</p> <p><b>i. <i>FEMA Preparedness Toolkit</i></b> The <u>FEMA Preparedness Toolkit</u> (PrepToolkit) provides access to tools and resources needed to implement the National Preparedness System and provide a collaborative space for communities completing the Unified Reporting Tool (URT). Recipients complete and submit their Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR), and other required assessments using the PrepToolkit. For assistance, contact <a href="mailto:support@preptoolkit.fema.dhs.gov">support@preptoolkit.fema.dhs.gov</a>.</p> <p><b>j. <i>Preparedness Grants Manual</i></b> Recipients seeking guidance on policies and procedures for managing preparedness grants should reference the <u>Preparedness Grants Manual</u>.</p>
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## 2. Eligibility

<b>A. Eligible Entities/Entity Types</b>	<p>Only the following entities or entity types are eligible to apply.</p> <p><b>a. <i>Applicants</i></b></p> <p>The administrator of EMAC is the only eligible recipient of the NIMS Cooperative Agreement.</p> <p><b>b. <i>Subapplicants</i></b></p> <p>Subapplicants and subawards are allowed if they have responsibility for administering EMAC.</p> <p>Subapplicants should not have foreign nationals or noncitizens included. If a subapplicant has foreign nationals, they must be properly vetted and must adhere to all government statutes, policies, and procedures including “staff American, stay in America” and security requirements.</p>
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<b>B. Project Type Eligibility</b>	<p><i><b>Allowable Project Types</b></i></p> <ul style="list-style-type: none"> <li>▪ Participation in National Level Exercises</li> <li>▪ Technical assistance engagements</li> <li>▪ Mutual aid inventory of Mission Ready Packages</li> <li>▪ Data analysis for the improvement of the core capabilities that stabilize community lifelines</li> <li>▪ Support state emergency management agencies' implementation of EMAC and other mutual aid activities</li> <li>▪ Increase the interoperability and collaboration of the EMAC Operations System</li> </ul>
<b>C. Requirements for Personnel, Partners, and Other Parties</b>	<p>Subapplicants should not have foreign nationals or noncitizens included. If a subapplicant has foreign nationals, they must be properly vetted and must adhere to all government statutes, policies, and procedures including “staff American, stay in America” and security requirements.</p> <p>Subapplicants/subrecipients must submit short bios and resumes. This should include the type of entity, organizational leadership, and board members along with the both the names and addresses of the individuals. Resumes are subject to approval.</p>
<b>D. Maximum Number of Applications</b>	The maximum number of applications that can be submitted is: One
<b>E. Additional Restrictions</b>	<p>National Incident Management System (NIMS) Implementation</p> <p>In expending funds under this program, recipients that are state, local, tribal, or territorial governments must ensure and maintain adoption and implementation of NIMS. The state, local, tribal, or territorial government must show adoption of NIMS during any point of the period of performance.</p> <p>The list of objectives used for progress and achievement reporting is at <a href="https://www.fema.gov/emergency-managers/nims/implementation-training">https://www.fema.gov/emergency-managers/nims/implementation-training</a>.</p> <p>Applicants/subapplicants or recipients/subrecipients are required to certify their compliance with federal statutes, DHS directives, policies, and procedures.</p>
<b>F. References for Eligibility Factors within the NOFO</b>	<p>Please see the following references provided below:</p> <ol style="list-style-type: none"> <li>1. “Responsiveness Review Criteria” subsection</li> <li>2. “Financial Integrity Criteria” subsection</li> <li>3. “Supplemental Financial Integrity Criteria and Review” subsection</li> </ol>

	4. FEMA may/will request financial information such as Employer Identification Number (EIN) and bank information as part of the potential award selection. This will apply to everyone prospered, including subrecipients.
<b>G. Cost Sharing Requirement</b>	There is no cost share requirement.
<b>H. Cost Share Description, Type and Restrictions</b>	Not applicable.
<b>I. Cost Sharing Calculation Example</b>	Not applicable.
<b>J. Required information for verifying Cost Share</b>	Not applicable.

### **3. Program Description**

#### **A. Background, Program Purpose, and Program History**

The nation's ability to address emergent threats is rooted in the strength of its emergency management workforce, partnership and interconnectivity. This interconnectivity includes the necessity to better integrate across federal agencies and with non-federal partners to quickly assess, adapt, surge, and respond to a wide range of threats and hazards. In support of the National Preparedness Goal, [State Homeland Security Program \(SHSP\)](#) recipients must belong to, be in, or act as a temporary member of the Emergency Management Assistance Compact (EMAC), except for American Samoa and the Commonwealth of the Northern Mariana Islands, which are not required to belong to EMAC at this time. The Emergency Management Assistance Compact was ratified by the U.S. Congress (P.L. 104-321).

EMAC signatories include all 50 states, the District of Columbia, Puerto Rico, Guam, Commonwealth of Northern Mariana Islands, and the U.S. Virgin Islands. The federal government doctrinally and financially supports EMAC but does not manage it. EMAC's unique relationships with states, regions, territories, and federal organizations, such as FEMA and the National Guard Bureau, enable it to move a wide variety of resources to stabilize community lifelines immediately after an incident. Among other things, EMAC assists states in sending personnel, equipment, and commodities to support disaster relief efforts in other states.

The EMAC-generated after-action reports, quarterly reports, and reports on demand will provide data that will enhance current and future emergency management initiatives. This information will aid in the development and implementation of National Qualification System (NQS) work items, Resource Typing (RT) definitions, and mutual aid tools supporting the NIC's strategic priorities.

#### **B. Goals and Objectives**



The purpose of the Fiscal Year (FY) 2025 NIMS Cooperative Agreement is to support EMAC, which is a Congressionally ratified mutual aid compact (Pub. L. No. 104-321). The “purpose of the compact is to provide for mutual assistance between the states entering into the compact in managing any emergency disaster that is duly declared by the Governor of the affected state, whether arising from natural disaster, technological hazard, man-made disaster, civil emergency aspects of resources shortages, community disorders, insurgency or enemy attack.” The FY 2025 NIMS Cooperative Agreement the NIMS-EMAC NOFO addresses the challenge of closing funding gaps for EMAC operations, ensuring a swift and coordinated response to emergent threats and disasters. The success of EMAC rests on sustaining, maintaining, and improving its operational capability and the capabilities and implementation of its members. It seeks to solve the problem of fragmented emergency management efforts by strengthening interconnectivity and collaboration between federal agencies and non-federal partners. The NIMS-EMAC NOFO supports Mission 5: Build a Resilient Nation and Respond to Incidents, Objective 5.2: Strengthen National Resilience, and Objective 5.4: Enhance Training and Readiness of First Responders, of the DHS 2023 Quadrennial Homeland Security Review (QHSR). Specifically, it aims to streamline the integration and coordination of resources during crises, allowing for quicker adaptation and mobilization across various jurisdictions.

This funding supports the development of procedures, training, and resources that enhance the efficiency and effectiveness of the national mutual aid system, enabling faster and more coordinated responses during crises. By investing in the operational readiness of its member states, EMAC strengthens national preparedness, ensuring that the nation is better equipped to handle future threats and disasters.

Ultimately, the program aims to resolve gaps in interstate cooperation and the challenge of timely, organized deployment of resources by ensuring that member states have the procedures and programs in place to support seamless mutual aid execution. This has a direct impact on the overall national preparedness, improving the nation’s ability to respond to and recover from emergencies in a more efficient and unified manner.

#### **Long-term Goals:**

The NIMS-EMAC goal is to maintain an efficient and effective national mutual aid system, improving coordination and readiness across EMAC members, demonstrated by faster response time to major threats and emergencies, increase in the deployment of resources in emergencies, and an improvement in overall national preparedness.

#### **Program Objectives:**

NIMS provides funding for EMAC to enhance mutual aid capabilities, advance implementation, and support the whole community in delivering lifesaving and life-sustaining mutual aid that meet the following objectives:

- Coordinate the development, maintenance, and implementation of NIMS to enable a flexible approach for collaborating across disciplines and all levels of government.
- Develop and/or refine FEMA National Integration Center “NIMS products” to help SLTTs improve preparedness for the whole community.

- Enhance mutual aid capabilities through EMAC to advance implementation and support the whole community to provide lifesaving and life-sustaining commodities, equipment, and personnel.
- Sustain an effective national-level mutual aid system to strengthen national resilience in the face of disasters.

### C. Program Rationale

The FEMA NIMS-EMAC program supports the [DHS 2023 Quadrennial Homeland Security Review \(QHSR\), Mission 5: Build a Resilient Nation and Respond to Incidents, Objective 5.2: Strengthen National Resilience and Objective 5.4: Enhance Training and Readiness of First Responders](#), which aligns FEMA's readiness priorities to adapt to the increased frequency, severity, and complexity of heightened demands on FEMA and the larger emergency management community.

Communities can address these challenges by using a systematic approach that builds on proven preparedness activities. NIMS provides stakeholders across the whole community with the shared vocabulary, systems, and processes to deliver the capabilities described in the National Preparedness System (NPS).

To this end, the Emergency Management Assistance Compact provides at the national level a consistent and reliable approach to emergency resource allocation.

### D. Federal Assistance Type

#### Cooperative Agreement

Program authority and responsibility under this Cooperative Agreement resides with FEMA. FEMA retains the right to terminate all or part of the Cooperative Agreement in a manner consistent with 2 C.F.R. § 200.340 and may conduct site visits and monitoring throughout the period of performance.

FEMA will work with the recipient to develop and refine the details of executing this award, including work plans, goals, objectives, performance metrics, timelines, effectiveness measures, selection of key players, development of outreach or educational materials, and coordination of multistate efforts, and will define eligible and ineligible tasks to ensure that the program is effectively implemented.

The recipient shall not develop or begin developing tasks not approved in the recipient's application without FEMA's prior approval and issuance of an award amendment.

### E. Performance Measures and Targets

The recipient of this Cooperative Agreement will collaborate with FEMA to achieve the program's performance measures listed below throughout the period of performance.

The NIMS Cooperative Agreement seeks to support the following outcomes:

1. Ensure the reliability and efficiency of EMAC operations;

2. Conduct EMAC supporting activities; and
3. Increase the effectiveness of national mutual aid by coordinating with FEMA program office.

These outcomes inform the following effectiveness measures and associated metrics for the NIMS Cooperative Agreement. FEMA requires that the administrator of EMAC, the sole NIMS Cooperative Agreement recipient, collect and submit information necessary to calculate metrics for the following performance measures:

- a. Continual improvement of the EMAC system based on activations, exercises, and preplanned events' after-action reviews, hot washes, peer reviewed best practices and audits.
  - i. Metric: Number of improvements to EMAC operations or components because of the listed activities.
- b. Information sharing of EMAC operational activities.
  - i. Metric: Number of instances of information sharing related to EMAC operational activities.
- c. Engagement with FEMA in accordance with statutes on the development and sustainment of national mutual aid doctrine, policies, and programs.
  - i. Metric: Number of engagements (at least once a quarter) with FEMA during the period of performance.
- d. Engagement and alignment with national resource typing, job positions/qualifications, Mission Ready Packaging, and National Qualification System initiatives.
  - i. Metric: Number of NIMS resource typing, job/positions/qualifications supported during development by the National Integration Center.
- e. Transfer of information and knowledge on EMAC and mutual aid to federal partners.
  - i. Metric: Number of instances of information sharing on EMAC and mutual aid to federal partners.
- f. Coordination with FEMA, National Guard Bureau, and U.S. Northern Command on operational activities in support of large-scale disaster response.
  - i. Metric: Percentage of disasters that occurred where EMAC satisfactorily coordinated large-scale operational activities with FEMA, National Guard Bureau, and U.S. Northern Command.
- g. Support of the EMAC through training, education, exercises, preparedness activities, and operational activities for intrastate mutual aid, interstate mutual aid (EMAC), and international mutual aid.
  - i. Metric: Number of listed activities completed during the period of performance.
- h. Support state emergency management implementation of EMAC within each member state to the extent that the individual member state determines or deemed appropriate.
  - i. Metric: Number of states receiving direct support in EMAC implementation.

- i. Increase the interoperability and collaboration of the EMAC Operations System to full functionality with other existing, updated, and newly developed national emergency management operational and mutual aid systems.
  - i. Metric: Percentage of interoperability and functionality achieved between EMAC Operations System and other emergency management operation and mutual aid systems.
- j. Alignment of EMAC and mutual aid with the National Preparedness Goal and NIMS.
  - i. Metric: Number of specific changes made to EMAC and mutual aid to align with the National Preparedness Goal and NIMS.
- k. Alignment of EMAC and mutual aid with Threat Hazard Identification and Risk Assessment (THIRA).
  - i. Metric: Number of specific changes made to EMAC and mutual aid to align with THIRA.
- l. Alignment of EMAC and mutual aid with National Response Framework.
  - i. Metric: Number of specific changes made to EMAC and mutual aid to align with the National Response Framework.
- m. Delivery of EMAC lessons learned for integration into national planning efforts.
  - i. Metric: Number of EMAC lessons-learned integrations into national planning efforts.
- n. EMAC data analysis for the improvement of the core capabilities that stabilize community lifelines.
  - i. Metric: Number of EMAC analysis integrated into national planning efforts.
- o. Support EMAC operational activities during federal, state activations, and pre-planned events.
  - i. Metric: Number of operational activities supported by EMAC.
- p. Participation of EMAC in National Level Exercises.
  - i. Metric: Number of EMAC engagements in National Level Exercises.
- q. Participation in catastrophic planning and related exercises at the state, regional, federal, and national levels to determine and ensure EMAC Operations System is fully integrated into each respective jurisdiction's plans.
  - i. Metric: Number of EMAC participations in planning and exercises at the stated jurisdictional levels and full integration of EMAC Operations System into each respective jurisdiction's plan following those activities.
- r. Engagement with the whole community on mutual aid.
  - i. Metric: Number of EMAC technical assistance engagements with the whole community.
  - ii. Metric: Number of technical support engagements to the international cross border compacts concerning use of the EMAC Operations System (EOS) to standardize the international mutual aid agreements by incorporating EMAC's concepts and core tenets.

- s. Increase the national mutual aid inventory of Mission Ready Packages in the Mutual Aid Support System (MASS) for use in mutual aid (intrastate, interstate, and international).
  - i. Metric: Percentage increase from previous year in national mutual aid inventory of Mission Ready Packages in MASS.

#### **F. Program-Specific Unallowable Costs**

Construction is an unallowable cost.

#### **G. General Funding Requirements**

Costs charged to federal awards (including federal and non-federal cost share funds) must comply with applicable statutes, rules and regulations, policies, this NOFO, and the terms and conditions of the federal award. This includes, among other requirements, that costs must be incurred, and products and services must be delivered within the budget period. [2 C.F.R. § 200.403\(h\)](#).

Recipients may not use federal funds or any cost share funds for the following activities:

1. Matching or cost sharing requirements for other federal grants and Cooperative Agreements (see [2 C.F.R. § 200.306](#)).
2. Lobbying or other prohibited activities under [18 U.S.C § 1913](#) or [2 C.F.R. § 200.450](#).
3. Prosecuting claims against the federal government or any other government entity (see [2 C.F.R. § 200.435](#)).

#### **H. Indirect Costs (Facilities and Administrative Costs)**

Indirect costs are allowed for recipients and/or subrecipients.

Indirect costs (IDC) are costs incurred for a common or joint purpose benefitting more than one cost objective and not readily assignable to specific cost objectives without disproportionate effort. Applicants with a current negotiated IDC rate agreement who desire to charge indirect costs to a federal award must provide a copy of their IDC rate agreement with their applications. Not all applicants are required to have a current negotiated IDC rate agreement. Applicants that are not required to have a negotiated IDC rate agreement, but are required to develop an IDC rate proposal, must provide a copy of their proposal with their applications. Applicants without a current negotiated IDC rate agreement (including a provisional rate) and who wish to charge the de minimis rate must contact to FEMA for further instructions. Applicants who wish to use a cost allocation plan in lieu of an IDC rate proposal must contact to FEMA for further instructions. As it relates to the IDC for subrecipients, a recipient must follow the requirements of [2 C.F.R. §§ 200.332](#) and [200.414](#) in approving the IDC rate for subawards.

#### **I. Management and Administration (M&A) Costs**

M&A costs are allowable by FEMA under this program.

M&A costs are activities directly related to administering the award, such as financial management and monitoring. The recipient may use up to 3% of the amount of the award for their M&A.

M&A are not overhead costs but are necessary direct costs incurred in direct support of the federal award or as a consequence of it, such as travel, meeting-related expenses, and salaries of full/part-time staff in direct support of the program. As such, M&A costs can be itemized in financial reports.

#### **J. Pre-Award Costs**

Pre-award costs are allowable only with the written consent of FEMA and if they are included in the award agreement. The applicant must notify the Project Officer in the FEMA/National Integration Center to request authorization for pre-award costs.

#### **K. Beneficiary Eligibility**

There are no program requirements for Beneficiary Eligibility.

#### **L. Participant Eligibility**

There are no program requirements for Participant Eligibility.

This NOFO and any subsequent federal awards create no rights or causes of action for any participant.

#### **M. Authorizing Authority**

Section 661 of the Post-Katrina Emergency Management Reform Act of 2006, as amended (Pub. L. No. 109-295) (6 U.S.C. § 761).

#### **N. Appropriation Authority**

Full-Year Continuing Appropriations and Extensions Act, 2025, Pub. L. No. 119-4, § 1101.

#### **O. Budget Period**

There will be only a single budget period with the same start and end dates as the period of performance.

#### **P. Prohibition on Covered Equipment or Services**

Recipients, sub-recipients, and their contractors or subcontractors must comply with the prohibitions set forth in Section 889 of the [John S. McCain National Defense Authorization Act for Fiscal Year 2019](#), which restrict the purchase of covered telecommunications and

surveillance equipment and services. Please see 2 C.F.R. §§ 200.216, 200.327, 200.471, and Appendix II to 2 C.F.R. Part 200 for more information.

#### **4. Application Contents and Format**

##### **A. Pre-Application, Letter of Intent, and Whitepapers**

Not applicable.

##### **B. Application Content and Format**

Electronic submission is permitted and does not include special requirements for formatting.

##### **C. Application Components**

The following forms or information are required to be submitted via FEMA GO. The Standard Forms (SF) are also available at [Forms | Grants.gov](#).

- SF-424, Application for Federal Assistance.
- Grants.gov Lobbying Form, Certification Regarding Lobbying
- SF-424A, Budget Information (Non-Construction)
- SF-424B, Standard Assurances (Non-Construction)
- SF-LLL, Disclosure of Lobbying Activities

##### **D. Program-Specific Required Documents and Information**

The following program-specific forms or information are required to be submitted in FEMA GO:

1. Program Management Plan developed jointly with FEMA, that includes:
  - a. Goals, objectives, and outcomes of the proposal and the discrete activities to be conducted to accomplish the goals, objectives, and outcomes of the proposal;
  - b. A complete description of the program management structure addressing how the program will be structured, organized, and managed;
  - c. An organizational chart and description of how the proposal supports program execution;
  - d. A list of specific quality assurance activities, initiatives, and measures that will ensure the attainment of the goals, objectives, and outcomes of the proposal; and
  - e. A high-level, detailed program schedule to reflect the program life cycle, phases, and outcomes. This will include quality assurance measures incorporated throughout the program life cycle.
2. Risk management plan, describing the approach for identifying and managing risks, and identifying known or anticipated events or factors that could prevent the

recipient from meeting program objectives (i.e., cost, schedule, scope, performance, or quality).

3. Performance-based evaluation plan, including program performance measures that will assess the attainment of goals, objectives and outcomes, and which details a data collection plan that includes how the recipient will analyze data.

4. A Work Breakdown Structure (WBS), which is a task-oriented schematic of activities that organizes, defines, and graphically displays the total work needed to achieve the final objectives of a project. Each descending level represents an increasingly detailed definition of the project objective. The WBS is a system for subdividing a project into manageable work packages, components, or elements to provide a common framework for scope/cost/schedule communications, allocation of responsibility, monitoring and management.

5. A program narrative to address the following elements:

- a. Activities that will build sustainable preparedness at the state and local level using EMAC;
- b. Activities of the EMAC Operations System (EOS) on sharing on demand deployment data regarding filled and unfulfilled EMAC requests with FEMA.
- c. A capacity-building component for state and local jurisdictions to employ themselves (e.g., job aids, planning tools, performance support tools);
- d. A process for identifying lessons learned and best practices for adoption in ongoing Department of Homeland Security efforts; and
- e. Congruence with the National Preparedness Goal and System, NIMS and National Planning Frameworks.

6. A detailed program budget by task and a summary budget aggregating task costs into the categories described below. The program budget will be developed in coordination with FEMA to ensure consistency with the jointly developed Program Management Plan.

- a. Personnel: Indicate the total projected salary and wages for all project personnel. Compensation paid for employees engaged in activities must be consistent with that paid for similar work within the applicant's organization.
- b. Fringe benefits: Fringe benefits should be based on actual known costs or an established formula.
- c. Travel: Provide the total projected cost for travel. Applicant should determine costs by the projected number of trips multiplied by the number of people traveling multiplied by an average cost for travel and per diem (airfare, lodging, meals).
- d. Equipment: Provide the total projected cost of non-expendable items that need to be purchased. Non-expendable equipment is tangible property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. The organization's own capitalization policy and threshold amount for equipment classification may be used. Expendable items should be included either in the "supplies" category or in the "other" category. The applicant should analyze the costs and benefits of purchasing versus leasing equipment,



especially high-cost items and those subject to rapid technical advances. Large equipment purchases require identification and explanation. For more information regarding property management standards for equipment, please reference 2 C.F.R. §§ 200.310 – 200.316.

e. Supplies: Provide the total projected cost of supplies (e.g., office supplies, postage, training materials, copying paper, and other expendable items such as books and handheld tape recorders). The organization's own capitalization policy and threshold amount for classification of supplies may be used. Supplies include any materials that are expendable or consumed during the project.

f. Subaward: Provide the total projected amount allocated for subawards.

g. Other costs: Provide a total projected cost of miscellaneous items (e.g., rent, reproduction, telephone, janitorial or security services, and investigative or confidential funds).

h. Total budget: Provide the total dollar value by category for all activities.

#### **E. Post-Application Requirements for Successful Applicants**

Not applicable.

### **5. Submission Requirements and Deadlines**

#### **A. Address to Request Application Package**

Applications are processed through the FEMA GO system. To access the system, go to <https://go.fema.gov/>.

Steps Required to Apply for An Award Under This Program and Submit an Application:

To apply for an award under this program, all applicants must:

- a. Apply for, update, or verify their Unique Entity Identifier (UEI) number and EIN from the Internal Revenue Service;
- b. In the application, provide an UEI number;
- c. Have an account with [login.gov](https://login.gov/);
- d. Register for, update, or verify their System for Award Management (SAM) account and ensure the account is active before submitting the application;
- e. Register in FEMA GO, add the organization to the system, and establish the Authorized Organizational Representative (AOR). The organization's electronic business point of contact (eBiz POC) from the SAM registration may need to be involved in this step. For step-by-step instructions, see <https://www.fema.gov/media-library/assets/documents/181607>;
- f. Submit the complete application in FEMA GO; and
- g. Continue to maintain an active SAM registration with current information at all times during which it has an active federal award or an application or plan under consideration by a federal awarding agency. As part of this, applicants must also provide information on an applicant's immediate and highest-level owner and

subsidiaries, as well as on all predecessors that have been awarded federal contracts or federal financial assistance within the last three years, if applicable.

Per [2 C.F.R. § 25.110\(a\)\(2\)\(iv\)](#), if an applicant is experiencing exigent circumstances that prevents it from obtaining a UEI number and completing SAM registration prior to receiving a federal award, the applicant must notify FEMA as soon as possible. Contact [fema-grants-news@fema.dhs.gov](mailto:fema-grants-news@fema.dhs.gov) and provide the details of the exigent circumstances.

How to Register to Apply:

General Instructions:

Registering and applying for an award under this program is a multi-step process and requires time to complete. Below are instructions for registering to apply for FEMA funds. Read the instructions carefully and prepare the requested information before beginning the registration process. Gathering the required information before starting the process will alleviate last-minute searches for required information.

**The registration process can take up to four weeks to complete.** To ensure an application meets the deadline, applicants are advised to start the required steps well in advance of their submission.

Organizations must have a UEI number, EIN, and an active SAM registration.

Obtain a UEI Number:

All entities applying for funding, including renewal funding, must have a UEI number. Applicants must enter the UEI number in the applicable data entry field on the SF-424 form. For more detailed instructions for obtaining a UEI number, refer to [SAM.gov](#).

Obtain Employer Identification Number:

In addition to having a UEI number, all entities applying for funding must provide an EIN. The EIN can be obtained from the IRS by visiting <https://www.irs.gov/businesses/small-businesses-self-employed/apply-for-an-employer-identification-number-ein-online>.

Create a login.gov account:

Applicants must have a login.gov account in order to register with SAM or update their SAM registration. Applicants can create a login.gov account at: [https://secure.login.gov/sign\\_up/enter\\_email?request\\_id=34f19fa8-14a2-438c-8323-a62b99571fd](https://secure.login.gov/sign_up/enter_email?request_id=34f19fa8-14a2-438c-8323-a62b99571fd).

Applicants only have to create a login.gov account once. For existing SAM users, use the same email address for both login.gov and SAM.gov so that the two accounts can be linked.

For more information on the login.gov requirements for SAM registration, refer to <https://www.sam.gov/SAM/pages/public/loginFAQ.jsf>.

Register with SAM:

In addition to having a UEI number, all organizations must register with SAM. Failure to register with SAM will prevent your organization from applying through FEMA GO. SAM registration must be renewed annually and must remain active throughout the entire grant life cycle.

For more detailed instructions for registering with SAM, refer to: [Register with SAM](#)

**Note:** Per [2 C.F.R. § 25.200](#), applicants must also provide the applicant's immediate and highest-level owner, subsidiaries, and predecessors that have been awarded federal contracts or federal financial assistance within the past three years, if applicable.

Register in FEMA GO, Add the Organization to the System, and Establish the AOR:

Applicants must register in FEMA GO and add their organization to the system. The organization's electronic business point of contact (eBiz POC) from the SAM registration may need to be involved in this step. For step-by-step instructions, see: [FEMA GO Startup Guide](#)

Note: FEMA GO will support only the most recent major release of the following browsers:

- a. Google Chrome;
- b. Mozilla Firefox;
- c. Apple Safari; and
- d. Microsoft Edge.

Applicants using tablet type devices or other browsers may encounter issues with using FEMA GO.

Submitting the Final Application:

Applicants will be prompted to submit the standard application information, and any program-specific information required. Standard Forms (SF) may be accessed in the Forms tab under the: [SF-424 Family | Grants.gov](#).

Applicants should review these forms before applying to ensure they are providing all required information.

After submitting the final application, FEMA GO will provide either an error message, or an email to the submitting AOR confirming the transmission was successfully received.

## **B. Application Deadline**

07/30/25 11:59:59 PM Eastern Time

## **C. Pre-Application Requirements Deadline**

Not applicable.

## **D. Post-Application Requirements Deadline**

Not applicable.

#### E. Effects of Missing the Deadline

All applications must be completed in FEMA GO by the application deadline. FEMA GO automatically records proof of submission and generates an electronic date/time stamp when FEMA GO successfully receives an application. The submitting AOR will receive via email the official date/time stamp and a FEMA GO tracking number to serve as proof of timely submission prior to the application deadline.

**Applicants experiencing system-related issues have until 3:00 PM ET on the date applications are due to notify FEMA.** No new system-related issues will be addressed after this deadline. Applications not received by the application submission deadline will not be accepted.

### **6. Intergovernmental Review**

#### A. Requirement Description and State Single Point of Contact

An intergovernmental review may be required. Applicants must contact their state's [Single Point of Contact \(SPOC\)](#) to comply with the state's process under Executive Order 12372.

### **7. Application Review Information**

#### A. Threshold Criteria

The application will be reviewed to ensure it meets the requirements outlined in this NOFO. The program office and its subject matter experts will oversee the review process, ensuring compliance with all relevant standards.

#### B. Application Criteria

FEMA/NIC will review the submitted application for completeness and compliance with all application requirements.

The application will be evaluated and selected for funding based on:

- a. The applicant's proposed projects are compatible with supporting EMAC's priorities and requirements.
- b. The applicant's proposed projects demonstrate a role in administering EMAC as required by 6 U.S.C. § 761(a).
- c. The applicant's proposed costs are complete, reasonable, and cost-effective in relation to proposed EMAC support projects and tasks.

#### C. Financial Integrity Criteria

Before making an award, FEMA is required to review OMB-designated databases for applicants' eligibility and financial integrity information. This is required by [the Payment](#)

[Integrity Information Act of 2019 \(Pub. L. No. 116-117, § 2 \(2020\)\)](#), [41 U.S.C. § 2313](#), and the “Do Not Pay Initiative” ([31 U.S.C. 3354](#)). For more details, please see [2 C.F.R. § 200.206](#).

Thus, the Financial Integrity Criteria may include the following risk-based considerations of the applicant:

1. Financial stability.
2. Quality of management systems and ability to meet management standards.
3. History of performance in managing federal award.
4. Reports and findings from audits.
5. Ability to effectively implement statutory, regulatory, or other requirements.

#### **D. Supplemental Financial Integrity Criteria and Review**

Before making an award expected to exceed the simplified acquisition threshold (currently a total federal share of \$250,000) over the period of performance, FEMA is required by [41 U.S.C. § 2313](#) to review or consider certain information found in SAM.gov. For details, please see [2 C.F.R. § 200.206\(a\)\(2\)](#).

1. An applicant may review and comment on any information in the responsibility/qualification records available in SAM.gov.
2. Before making decisions in the risk review required by [2 C.F.R. § 200.206](#), FEMA will consider any comments by the applicant.

#### **E. Reviewers and Reviewer Selection**

This is a non-competitive grant. Program staff with expertise in EMAC will review the application.

#### **F. Merit Review Process**

Not applicable.

#### **G. Final Selection**

The program office director will make the final determination based on program office regulations.

### **8. Award Notices**

#### **A. Notice of Award**

The Authorized Organization Representative should carefully read the federal award package before accepting the federal award. The federal award package includes instructions on administering the federal award as well as terms and conditions for the award.

By submitting an application, applicants agree to comply with the prerequisites stated in this NOFO and the material terms and conditions of the federal award, should they receive an award.

FEMA will provide the federal award package to the applicant electronically via FEMA GO. Award packages include an Award Letter, Summary Award Memo, Agreement Articles, and Obligating Document. An award package notification email is sent via the grant application system to the submitting AOR.

Recipients must accept their awards no later than 30 days from the award date. Recipients shall notify FEMA of their intent to accept the award and proceed with work via the FEMA GO system.

Funds will remain on hold until the recipient accepts the award via FEMA GO and all other conditions of the award have been satisfied, or until the award is otherwise rescinded. Failure to accept a grant award within the specified timeframe may result in a loss of funds.

**B. Pass-Through Requirements**

Not applicable.

**C. Note Regarding Pre-Award Costs**

Even if pre-award costs are allowed, beginning performance is at the applicant and/or sub-applicant's own risk.

**D. Obligation of Funds**

Once the application is selected, the program office enters into agreement with the recipient, detailing the terms, funding amount, timelines, and other requirements. FEMA then obligates the funds by reserving the specified amount for the award.

**E. Notification to Unsuccessful Applicants**

Not applicable.

**9. Post-Award Requirements and Administration**

**A. Administrative and National Policy Requirements**

**Presidential Executive Orders**

Recipients must comply with the requirements of Presidential Executive Orders related to grants (also known as federal assistance and financial assistance), the full text of which are incorporated by reference.

In accordance with [Executive Order 14305, Restoring American Airspace Sovereignty \(June 6, 2025\)](#), and to the extent allowed by law, eligible state, local, tribal, and territorial grant

recipients under this NOFO are permitted to purchase unmanned aircraft systems, otherwise known as drones, or equipment or services for the detection, tracking, or identification of drones and drone signals, consistent with the legal authorities of state, local, tribal, and territorial agencies. Recipients must comply with all applicable federal, state, and local laws and regulations, and adhere to any statutory requirements on the use of federal funds for such unmanned aircraft systems, equipment, or services.

#### Subrecipient Monitoring and Management

Pass-through entities must comply with the requirements for subrecipient monitoring and management as set forth in 2 C.F.R. §§ 200.331-333.DHS Standard Terms and Conditions

#### **B. DHS Standard Terms and Conditions**

A recipient under this funding opportunity must comply with the DHS Standard Terms and Conditions in effect as of the time of the federal award. The DHS Standard Terms and Conditions are available online: [DHS Standard Terms and Conditions | Homeland Security](#). For continuation awards, the terms and conditions for the initial federal award will apply unless otherwise specified in the terms and conditions of the continuation award. The specific version of the DHS Standard Terms and Conditions applicable to the federal award will be in the federal award package.

A recipient under this funding opportunity must comply with the FY 2025 Department of Homeland Security Standard Terms and Conditions, v. 3 (Apr. 18, 2025), with the exception Paragraph C.IX (Communication and Cooperation with the Department of Homeland Security and Immigration Officials) and paragraph C.XVII(2)(a)(iii) (Anti-Discrimination Grant Award Certification regarding immigration). Paragraphs C.IX and C.XVII(2)(a)(iii) do not apply to any federal award under this funding opportunity. The FY 2025 Department of Homeland Security Standard Terms and Conditions, v. 3 (Apr. 18, 2025), are available at [www.dhs.gov/publication/dhs-standard-terms-and-conditions](http://www.dhs.gov/publication/dhs-standard-terms-and-conditions).

#### **C. Financial Reporting Requirements**

1. Recipients must report obligations and expenditures through a federal financial report. The Federal Financial Report (FFR) form, also known as Standard Form 425 (SF-425), is available online at: [SF-425 OMB #4040-0014](#).
2. Recipients must submit the FFR quarterly throughout the period of performance (POP) as detailed below:
3. The final FFR is due within 120 calendar days after the end of the POP.

FEMA may withhold future federal awards and cash payments if the recipient does not submit timely financial reports, or the financial reports submitted demonstrate lack of progress or provide insufficient detail.

#### **D. Programmatic Performance Reporting Requirements**

1. A Performance Report must be submitted quarterly throughout the POP.
2. A Performance Report must include:

- a. Reporting requirements must be met throughout the life of the Cooperative Agreement (refer to the program guidance and the special conditions found in the award package for a full explanation of these requirements).
3. The Progress Report must be submitted through FEMA GO.
4. Performance Report Due Dates: The report is due within 30 days after the end of the reporting period.

## E. Closeout Reporting Requirements

Within 120 days after the end of the period of performance, or after an amendment has been issued to close out a federal award, recipients must submit the following:

1. The final request for payment, if applicable.
2. The final FFR.
3. The final progress report detailing all accomplishments.
4. A qualitative narrative summary of the impact of those accomplishments throughout the period of performance.
5. Other documents required by this NOFO, terms and conditions of the federal award, or other DHS Component guidance.

After FEMA approves these reports, it will issue a closeout notice. The notice will indicate the period of performance as closed, list any remaining funds to be de-obligated, and address the record maintenance requirement. Unless a longer period applies, such as due to an audit or litigation, for equipment or real property used beyond the period of performance, or due to other circumstances outlined in [2 C.F.R. § 200.334](#), this maintenance requirement is three years from the date of the final FFR.

Also, pass-through entities are responsible for closing out those subawards as described in [2 C.F.R. § 200.344](#); subrecipients are still required to submit closeout materials within 90 calendar days of the subaward period of performance end date. When a subrecipient completes all closeout requirements, pass-through entities must promptly complete all closeout actions in time for the recipient to submit all necessary documentation and information to FEMA during the closeout of their prime award. The recipient is responsible for returning any balances of unobligated or unliquidated funds that have been drawn down that are not authorized to be retained per [2 C.F.R. § 200.344\(e\)](#).

### Administrative Closeout

Administrative closeout is a mechanism for FEMA to unilaterally execute closeout of an award. FEMA will use available award information in lieu of final recipient reports, per [2 C.F.R. § 200.344\(h\)-\(i\)](#). It is an activity of last resort, and if FEMA administratively closes an award, this may negatively impact a recipient's ability to obtain future funding.

### Additional Reporting Requirements

Anytime there is a change in personnel for any of the awardees and/or subrecipients, their information needs to be submitted for approval (all the previous personal information identified).



## **F. Disclosing Information per 2 C.F.R. § 180.335**

Before entering into a federal award, the applicant must notify FEMA if it knows that the applicant or any of the principals (as defined at [2 C.F.R. § 180.995](#)) for the federal award:

1. Are presently excluded or disqualified;
2. Have been convicted within the preceding three years of any of the offenses listed in § 180.800(a) or had a civil judgment rendered against you for one of those offenses within that time period;
3. Are presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with the commission of any of the offenses listed in § 180.800(a); or
4. Have had one or more public transactions (Federal, State, or local) terminated within the preceding three years for cause or default.

This requirement is fully described in [2 C.F.R. §180.335](#).

Additionally, [2 C.F.R. § 180.350](#) requires recipients to provide immediate notice to FEMA at any time after entering a federal award if:

1. The recipient learns that either it failed to earlier disclose information as required by 2 C.F.R. § 180.335.
2. Due to changed circumstances, the applicant or any of the principals for the federal award now meet the criteria at 2 C.F.R. § 180.335 listed above.

## **G. Reporting of Matters Related to Recipient Integrity and Performance**

[Appendix XII to 2 C.F.R. Part 200](#) states the terms and conditions for recipient integrity and performance matters used for this funding opportunity.

If the total value of all active federal grants, Cooperative Agreements, and procurement contracts for a recipient exceeds \$10,000,000 at any time during the period of performance:

1. The recipient must maintain the currency of information reported in SAM.gov about civil, criminal, or administrative proceedings described in paragraph 2 of Appendix XII;
2. The required reporting frequency is described in paragraph 4 of Appendix XII.

## **H. Single Audit Report**

A recipient expending \$1,000,000 or more in federal awards (as defined by [2 C.F.R. § 200.1](#)) during its fiscal year must undergo an audit. This may be either a single audit complying with [2 C.F.R. § 200.514](#) or a program-specific audit complying with [2 C.F.R. §§ 200.501](#) and [200.507](#). Audits must follow [2 C.F.R. Part 200, Subpart F](#), 2 C.F.R. § 200.501, and the U.S. Government Accountability Office (GAO) [Generally Accepted Government Auditing Standards](#).

## **I. Monitoring and Oversight**

Per [2 C.F.R. § 200.337](#), DHS and its authorized representatives have the right of access to any records of the recipient or subrecipient pertinent to a Federal award to perform audits, site visits, and any other official use. The right also includes timely and reasonable access to the recipient's or subrecipient's personnel for the purpose of interview and discussion related to such documents or the Federal award in general.

Pursuant to this right and per [2 C.F.R. § 200.329](#), DHS may conduct desk reviews and make site visits to review and evaluate project accomplishments and management control systems as well as provide any required technical assistance. Recipients and subrecipients must respond in a timely and accurate manner to DHS requests for information relating to a federal award.

## **J. Program Evaluation**

Title I of the Foundations for Evidence-Based Policymaking Act of 2018, Pub. L. No. 115-435 (2019) (Evidence Act), [PUBL435.PS](#) urges federal awarding agencies to use program evaluation as a critical tool to learn, improve delivery, and elevate program service and delivery across the program lifecycle. Evaluation means “an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency.” Evidence Act, § 101 (codified at 5 U.S.C. § 311). OMB A-11, Section 290 (Evaluation and Evidence-Building Activities) further outlines the standards and practices for evaluation activities. Federal agencies are required to specify any requirements for recipient participation in program evaluation activities (2 C.F.R. § 200.301). Program evaluation activities incorporated from the outset in the NOFO and program design and implementation allow recipients and agencies to meaningfully document and measure progress and achievement towards program goals and objectives, and identify program outcomes and lessons learned, as part of demonstrating recipient performance (2 C.F.R. § 200.301).

As such, recipients and subrecipients are required to participate in a Program Office (PO) or a DHS Component-led evaluation, if selected. This may be carried out by a third-party on behalf of the PO or the DHS Component. Such an evaluation may involve information collections including but not limited to, records of the recipients; surveys, interviews, or discussions with individuals who benefit from the federal award, program operating personnel, and award recipients; and site visits or other observation of recipient activities, as specified in a DHS Component or PO-approved evaluation plan. More details about evaluation requirements may be provided in the federal award, if available at that time, or following the award as evaluation requirements are finalized. Evaluation costs incurred during the period of performance are allowable costs (either as direct or indirect) in accordance with [2 C.F.R. § 200.413](#).

Recipients and subrecipients are also encouraged, but not required, to participate in any additional evaluations after the period of performance ends, although any costs incurred to participate in such evaluations are not allowable and may not be charged to the federal award.

**K. Additional Performance Reporting Requirements**  
Not applicable.

**L. Termination of the Federal Award by FEMA**

1. Paragraph C.XL of the FY 2025 DHS Standard Terms and Conditions, v.3, sets forth a term and condition entitled “Termination of a Federal Award.” The termination provision condition listed below applies to the grant award. Paragraph C.XL of the FY 2025 DHS Standard Terms and Conditions, v.3, does not apply to grant awards made pursuant to this NOFO.

**2. Termination of the Federal Award by FEMA**

FEMA may terminate the federal award in whole or in part for one of the following reasons identified in 2 C.F.R. § 200.340:

- a. If the recipient or subrecipient fails to comply with the terms and conditions of the federal award.
- b. With the consent of the recipient, in which case FEMA and the recipient must agree upon the termination conditions. These conditions include the effective date and, in the case of partial termination, the portion to be terminated.
- c. If the federal award no longer effectuates the program goals or agency priorities. Under this provision, FEMA may terminate the award for these purposes if any of the following reasons apply:
  - i. If DHS/FEMA, in its sole discretion, determines that a specific award objective is ineffective at achieving program goals as described in this NOFO;
  - ii. If DHS/FEMA, in its sole discretion, determines that an objective of the award as described in this NOFO will be ineffective at achieving program goals or agency priorities;
  - iii. If DHS/FEMA, in its sole discretion, determines that the design of the grant program is flawed relative to program goals or agency priorities;
  - iv. If DHS/FEMA, in its sole discretion, determines that the grant program is not aligned to either the DHS Strategic Plan, the FEMA Strategic Plan, or successor policies or documents;
  - v. If DHS/FEMA, in its sole discretion, changes or re-evaluates the goals or priorities of the grant program and determines that the award will be ineffective at achieving the updated program goals or agency priorities; or
  - vi. For other reasons based on program goals or agency priorities described in the termination notice provided to the recipient pursuant to 2 C.F.R. § 200.341.
  - vii. If the awardee falls out of compliance with the Agency’s statutory or regulatory authority, award terms and conditions, or other applicable laws.

**3. Termination of a Subaward by the Pass-Through Entity**

The pass-through entity may terminate a subaward in whole or in part for one of the following reasons identified in 2 C.F.R. § 200.340:

- a. If the subrecipient fails to comply with the terms and conditions of the federal award.
- b. With the consent of the subrecipient, in which case the pass-through entity and the subrecipient must agree upon the termination conditions. These conditions include the effective date and, in the case of partial termination, the portion to be terminated.
- c. If the pass-through entity's award has been terminated the pass-through recipient will terminate its subawards.

#### 4. Termination by the Recipient or Subrecipient

The recipient or subrecipient may terminate the federal award in whole or in part for the following reason identified in 2 C.F.R. § 200.340: Upon sending FEMA or pass-through entity a written notification of the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if FEMA or pass-through entity determines that the remaining portion of the federal award will not accomplish the purposes for which the federal award was made, FEMA or pass-through entity may terminate the federal award in its entirety.

#### 5. Impacts of Termination

- a. When FEMA terminates the federal award prior to the end of the period of performance due to the recipient's material failure to comply with the terms and conditions of the federal award, FEMA will report the termination in SAM.gov in the manner described at 2 C.F.R. § 200.340(c).
- b. When the federal award is terminated in part or its entirety, FEMA or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in 2 C.F.R. §§ 200.344 and 200.345.

#### 6. Notification Requirements

FEMA or the pass-through entity must provide written notice of the termination in a manner consistent with 2 C.F.R. § 200.341. The federal award will be terminated on the date of the notification unless stated otherwise in the notification.

#### 7. Opportunities to Object and Appeals

Where applicable, when FEMA terminates the federal award, the written notification of termination will provide the opportunity and describe the process to object and provide information challenging the action, pursuant to 2 C.F.R. § 200.342.

#### 8. Effects of Suspension and Termination

The allowability of costs to the recipient or subrecipient resulting from financial obligations incurred by the recipient or subrecipient during a suspension or after the termination of a federal award are subject to 2 C.F.R. § 200.343.

## M. Best Practices

While not a requirement in the DHS Standard Terms and Conditions, as a best practice, entities receiving funds through this program should ensure that cybersecurity is integrated into the design, development, operation, and maintenance of investments that impact information technology (IT) and/ or operational technology (OT) systems. Additionally, “The recipient and subrecipient must take reasonable cybersecurity and other measures to safeguard information including protected personally identifiable information (PII) and other types of information.” 2 C.F.R. § 200.303(e).

## N. Payment Information

Recipients will submit payment requests in FEMA GO for FY25 awards under this program.

### **Instructions to Grant Recipients Pursuing Payments**

FEMA reviews all grant payments and obligations to ensure allowability in accordance with [2 C.F.R. § 200.305](#). These measures ensure funds are disbursed appropriately while continuing to support and prioritize communities who rely on FEMA for assistance. Once a recipient submits a payment request, FEMA will review the request. If FEMA approves a payment, recipients will be notified by FEMA GO and the payment will be delivery pursuant to the recipients SAM.gov financial information. If FEMA disapproves a payment, FEMA will inform the recipient.

### **Processing and Payment Timeline**

FEMA must comply with regulations governing payments to grant recipients. See [2 C.F.R. § 200.305](#). For grant recipients other than States, [2 C.F.R. § 200.305\(b\)\(3\)](#) stipulates that FEMA is to make payments on a reimbursement basis within 30 days after receipt of the payment request, unless FEMA reasonably believes the request to be improper. For state recipients, [2 C.F.R. § 200.305\(a\)](#) instructs that federal grant payments are governed by Treasury-State Cash Management Improvement Act (CMIA) agreements ("Treasury-State agreement") and default procedures codified at [31 C.F.R. part 205](#) and [Treasury Financial Manual \(TFM\) 4A-2000, "Overall Disbursing Rules for All Federal Agencies."](#) See [2 C.F.R. § 200.305\(a\)](#).

Treasury-State agreements generally apply to "major federal assistance programs" that are governed by [31 C.F.R. part 205, subpart A](#) and are identified in the Treasury-State agreement. [31 C.F.R. §§ 205.2, 205.6](#). Where a federal assistance (grant) program is not governed by subpart A, payment and funds transfers from FEMA to the state are subject to [31 C.F.R. part 205, subpart B](#). Subpart B requires FEMA to "limit a funds transfer to a state to the minimum amounts needed by the state and must time the disbursement to be in accord with the actual, immediate cash requirements of the state in carrying out a federal assistance program or project. The timing and amount of funds transfers must be as close as is administratively feasible to a state's actual cash outlay for direct program costs and the proportionate share of any allowable indirect costs. Nearly all FEMA grants are not

“major federal assistance programs.” As a result, payments to states for those grants are subject to the “default” rules of [31 C.F.R. part 205, subpart B](#).

If additional information is needed, a request for information will be issued by FEMA to the recipient; recipients are strongly encouraged to respond to any additional FEMA request for information inquiries within three business days. If an adequate response is not received, the request may be denied, and the entity may need to submit a new reimbursement request; this will re-start the 30-day timeline.

### **Submission Process**

All non-disaster grant program reimbursement requests must be reviewed and approved by FEMA prior to drawdowns.

For all non-disaster reimbursement requests (regardless of system), please ensure submittal of the following information:

1. Grant ID / Award Number
2. Total amount requested for drawdown
3. Purpose of drawdown and timeframe covered (must be within the award performance period)
4. Subrecipient Funding Details (if applicable).
  - Is funding provided directly or indirectly to an NGO?
    - o If **no**, include statement “This grant funding is not being directed to a subrecipient.”
  - If **yes**, provide the following details:
    - o The name, mission statement, and purpose of each subrecipient receiving funds, along with the amount allocated and the specific role or activity being reimbursed.
    - o Whether the subrecipient’s work or mission involves supporting aliens, regardless of whether FEMA funds support such activities.
    - o Whether the payment request includes an activity involving support to aliens.
    - o Whether the subrecipient has any diversity, equity, and inclusion practices.
5. Supporting documentation to demonstrate that expenses are allowable, allocable, reasonable, and necessary under [2 CFR part 200](#) and in compliance with the grant’s NOFO, award terms, and applicable federal regulations.

### **O. Immigration Conditions**

A recipient under this funding opportunity must comply with the FY 2025 Department of Homeland Security Standard Terms and Conditions, v. 3 (Apr. 18, 2025), with the exception Paragraph C.IX (Communication and Cooperation with the Department of Homeland Security and Immigration Officials) and paragraph C.XVII(2)(a)(iii) (Anti-Discrimination Grant Award Certification regarding immigration). Paragraphs C.IX and C.XVII(2)(a)(iii) do not apply to any federal award under this funding opportunity. The FY 2025 Department of Homeland Security Standard Terms and Conditions, v. 3 (Apr. 18, 2025) are available at [www.dhs.gov/publication/dhs-standard-terms-and-conditions](http://www.dhs.gov/publication/dhs-standard-terms-and-conditions).

## **10. Other Information**

### **A. Period of Performance Extension**

Extensions to the period of performance are allowed.

Recipients should consult with their FEMA point of contact for requirements related to a performance period extension.

### **B. Other Information**

#### ***a. Environmental Planning and Historic Preservation (EHP) Compliance***

FEMA is required to consider effects of its actions on the environment and historic properties to ensure that activities, grants and programs funded by FEMA, comply with federal EHP laws, Executive Orders, regulations, and policies.

Recipients and subrecipients proposing projects with the potential to impact the environment or cultural resources, such as the modification or renovation of existing buildings, structures, and facilities, and/or new construction and/or replacement of buildings, structures, and facilities, must participate in the FEMA EHP review process. This includes conducting early engagement to help identify EHP resources, such as threatened or endangered species and historic properties; submitting a detailed project description with supporting documentation to determine whether the proposed project has the potential to impact EHP resources; and, identifying mitigation measures and/or alternative courses of action that may lessen impacts to those resources.

FEMA is sometimes required to consult with other regulatory agencies and the public in order to complete the review process. Federal law requires EHP review to be completed before federal funds are released to carry out proposed projects. FEMA may not be able to fund projects that are not in compliance with applicable EHP laws, Executive Orders, regulations, and policies. FEMA may recommend mitigation measures and/or alternative courses of action to lessen impacts to EHP resources and bring the project into EHP compliance.

EHP guidance is found at [Environmental Planning and Historic Preservation](#). The site contains links to documents identifying agency EHP responsibilities and program requirements, such as implementation of the National Environmental Policy Act and other EHP laws, regulations, and Executive Orders. DHS and FEMA EHP policy is also found in the [EHP Directive & Instruction](#).

All FEMA actions, including grants, must comply with National Flood Insurance Program (NFIP) criteria or any more restrictive federal, state, or local floodplain management standards or building code ([44 C.F.R. § 9.11\(d\)\(6\)](#)). For actions located within or that may affect a floodplain or wetland, the following alternatives must be considered: a) no action; b) alternative locations; and c) alternative actions, including alternative actions that use natural features or nature-based solutions. Where possible, natural features and nature-based solutions shall be used. If not practicable as an alternative on their own, natural features and nature-based solutions may be incorporated into actions as minimization measures.

The GPD EHP screening form is located at [https://www.fema.gov/sites/default/files/documents/fema\\_ehp-screening\\_form\\_ff-207-fy-21-100\\_5-26-2021.pdf](https://www.fema.gov/sites/default/files/documents/fema_ehp-screening_form_ff-207-fy-21-100_5-26-2021.pdf).

## **b. *Procurement Integrity***

When purchasing under a FEMA award, recipients and subrecipients must comply with the federal procurement standards in [2 C.F.R. §§ 200.317-200.327](#). To assist with determining whether an action is a procurement or instead a subaward, please consult [2 C.F.R. § 200.331](#). For detailed guidance on the federal procurement standards, recipients and subrecipients should refer to various materials issued by FEMA's Procurement Disaster Assistance Team (PDAT). Additional resources, including an upcoming trainings schedule can be found on the PDAT Website: <https://www.fema.gov/grants/procurement>.

Under [2 C.F.R. § 200.317](#), when procuring property and services under a federal award, states (including territories) and Indian Tribes must follow the same policies and procedures they use for procurements from their non-federal funds; additionally, states and Indian Tribes must now follow [2 CFR §200.322](#), regarding domestic preferences for Procurements and [2 CFR§ 200.327](#) regarding required contract provisions.

Local government and nonprofit recipients or subrecipients must have and use their own documented procurement procedures that reflect applicable state, local, tribal, and territorial (SLTT) laws and regulations, provided that the procurements conform to applicable federal law and the standards identified in 2 C.F.R. Part 200.

### **1. Important Changes to Procurement Standards in 2 C.F.R. Part 200**

On April 22, 2024, OMB updated various parts of Title 2 of the Code of Federal Regulations, among them the procurement standards. These revisions apply to all FEMA awards with a federal award date or disaster declaration date on or after October 1, 2024, unless specified otherwise. The changes include updates to the federal procurement standards, which govern how FEMA award recipients and subrecipients must purchase under a FEMA award.

More information on OMB's revisions to the federal procurement standards can be found in [Purchasing Under a FEMA Award: 2024 OMB Revisions Fact Sheet](#).

### **2. Competition and Conflicts of Interest**

[2 CFR §200.319\(b\)](#), applicable to local government and nonprofit recipients or subrecipients, requires that contractors that develop or draft specifications, requirements statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. FEMA considers these actions to be an organizational conflict of interest and interprets this restriction as applying to contractors that help a recipient or subrecipient develop its grant application, project plans, or project budget. This prohibition also applies to the use of former employees to manage the grant or carry out a contract when those former employees worked on such activities while they were employees of the recipient or subrecipient.



Under this prohibition, unless the recipient or subrecipient solicits for and awards a contract covering both development and execution of specifications (or similar elements as described above), and this contract was procured in compliance with [2 C.F.R. § § 200.317-200.327](#), federal funds cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of those specifications. This rule applies to all contracts funded with federal grant funds, including pre-award costs, such as grant writer fees, as well as post- award costs, such as grant management fees.

In addition to organizational conflicts of interest, situations considered to be restrictive of competition include, but are not limited to:

- Placing unreasonable requirements on firms for them to qualify to do business;
- Requiring unnecessary experience and excessive bonding;
- Noncompetitive pricing practices between firms or between affiliated companies;
- Noncompetitive contracts to consultants that are on retainer contracts;
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
- Any arbitrary action in the procurement process.

Under [2 C.F.R. § 200.318\(c\)\(1\)](#), local government and nonprofit recipients or subrecipients are required to maintain written standards of conduct covering conflicts of interest and governing the actions of their employees engaged in the selection, award, and administration of contracts. **No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such conflicts of interest would arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the recipient or subrecipient may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the recipient or subrecipient may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The recipient’s or subrecipient’s standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents.**

Under [2 C.F.R. 200.318\(c\)\(2\)](#), if the local government and nonprofit recipient or subrecipient has a parent, affiliate, or subsidiary organization that is not a SLTT government, the recipient or subrecipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflict of interest means that because of a relationship with a parent company, affiliate, or subsidiary organization, the recipient or subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. The recipient or subrecipient must disclose in writing any potential conflicts of interest to FEMA or the pass-through entity in accordance with applicable FEMA policy.

### 3. Supply Schedules and Purchasing Programs

Generally, a recipient or subrecipient may seek to procure goods or services from a federal supply schedule, state supply schedule, or group purchasing agreement.

Information about GSA programs for states, Indian Tribes, and local governments, and their instrumentalities, can be found at [Purchasing Resources and Support for State and Local Governments.pdf](#).

Help for state, local, and tribal governments to make MAS buys | GSA and <https://www.gsa.gov/buying-selling/purchasing-programs/gsa-schedules/schedule-buyers/state-and-local-governments>.

### 4. Procurement Documentation

Per [2 C.F. R§ 200.318\(i\)](#), local government and nonprofit recipients or subrecipients are required to maintain and retain records sufficient to detail the history of procurement covering at least the rationale for the procurement method, selection of contract type, contractor selection or rejection, and the basis for the contract price. States and Indian Tribes are reminded that in order for any cost to be allowable, it must be adequately documented per [2 CFR §200.403\(g\)](#).

Examples of the types of documents that would cover this information include but are not limited to:

- Solicitation documentation, such as requests for quotes, invitations for bids, or requests for proposals;
- Responses to solicitations, such as quotes, bids, or proposals;
- Pre-solicitation independent cost estimates and post-solicitation cost/price analyses on file for review by federal personnel, if applicable;
- Contract documents and amendments, including required contract provisions; and
- Other documents required by federal regulations applicable at the time a grant is awarded to a recipient.

#### c. Financial Assistance Programs for Infrastructure

##### **d. *Mandatory Disclosures***

The non-federal entity or applicant for a federal award must disclose, in a timely manner, in writing to the federal awarding agency or pass-through entity all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award, [2 CFR § 200.113](#).

##### **e. *Adaptive Support***

Pursuant to [Section 504, of the Rehabilitation Act of 1973](#), recipients of FEMA financial assistance must ensure that their programs and activities do not discriminate against qualified individuals with disabilities.

## ***f. Record Retention***

### **1. Record Retention Period**

Financial records, supporting documents, statistical records, and all other non-federal entity records pertinent to a federal award generally must be maintained for at least three years from the date the final FFR is submitted. See [2 C.F.R. §200.334](#). Further, if the recipient does not submit a final FFR and the award is administratively closed, FEMA uses the date of administrative closeout as the start of the general record retention period.

The record retention period **may be longer than three years or have a different start date** in certain cases.

### **2. Types of Records to Retain**

FEMA requires that recipients and subrecipients maintain the following documentation for federally funded purchases:

- Specifications
- Solicitations
- Competitive quotes or proposals
- Basis for selection decisions
- Purchase orders
- Contracts
- Invoices
- Cancelled checks

## ***g. Actions to Address Noncompliance***

Non-federal entities receiving financial assistance funding from FEMA are required to comply with requirements in the terms and conditions of their awards or subawards, including the terms set forth in applicable federal statutes, regulations, NOFOs, and policies. Throughout the award lifecycle or even after an award has been closed, FEMA or the pass-through entity may discover potential or actual noncompliance on the part of a recipient or subrecipient.

In the case of any potential or actual noncompliance, FEMA may place special conditions on an award per [2 C.F.R. § 200.208](#) and [2 C.F.R. § 200.339](#). FEMA may place a hold on funds until the matter is corrected, additional information is provided per 2 C.F.R. § 200.339, or it may do both. Similar remedies for noncompliance with certain federal civil rights laws are authorized pursuant to [44 C.F.R Part 7](#) and [44 C.F.R Part 19](#) or other applicable regulations.

If the noncompliance is not able to be corrected by imposing additional conditions or the recipient or subrecipient refuses to correct the matter, FEMA may take other remedies allowed under [2 C.F.R. § 200.339](#).

## ***h. Audits***

FEMA grant recipients are subject to audit oversight from multiple entities including the DHS OIG, the GAO, the pass-through entity, or independent auditing firms for single audits, and may cover activities and costs incurred under the award. Auditing agencies such as the DHS OIG, the GAO, and the pass-through entity (if applicable), and FEMA in its oversight capacity, must have access to records pertaining to the FEMA award.

9. Appendices - Program Terms and Conditions (separate document)