

The Department of Homeland Security (DHS)

Notice of Funding Opportunity (NOFO)

Fiscal Year 2025 Tribal Homeland Security Grant Program

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

A. Agency Name	U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA)
B. NOFO Title	Fiscal Year 2025 Tribal Homeland Security Grant Program
C. Announcement Type	Initial
D. Funding Opportunity Number	DHS-25-GPD-150-00-99
E. Assistance Listing Number	97.150
F. Expected Total Funding	\$13,500,000
G. Anticipated Number of Awards	19 awards
H. Expected Award Range	\$40,000 to \$2,000,000
I. Projected Application Start Date	08/01/2025 4:00 p.m. Eastern Time (ET)
J. Projected Application End Date	08/15/2025 05:00 p.m. Eastern Time (ET)
K. Anticipated Funding Selection Date	No later than August 23, 2025
L. Anticipated Award Date	No later than September 30, 2025
M. Projected Period of Performance Start Date	09/01/2025

N. Projected Period of Performance End Date	08/31/2028
O. Executive Summary	<p>The Fiscal Year (FY) 2025 Tribal Homeland Security Grant Program (THSGP) is one of three grant programs that support DHS/FEMA’s focus on enhancing the ability of state, local, tribal, and territorial governments, as well as nonprofit organizations, to prevent, prepare for, protect against, and respond to terrorist attacks. These grant programs are part of a comprehensive set of measures authorized by Congress and implemented by DHS to help strengthen the nation’s communities against potential terrorist attacks.</p> <p>Tribal Nations face substantially increased risks that are not adequately addressed through other existing grant programs. Factors such as remote locations, limited access to resources, technological infrastructure challenges, and historical tensions make them more susceptible to emerging threats. The need to bolster technology and information infrastructure is crucial to address these challenges adequately. The THSGP respects the sovereign rights of Tribal Nations by allowing them to apply and be awarded preparedness grant funding as a direct recipient to address their unique risks and needs.</p>
P. Agency Contact	<p>a. <i>Program Office Contact</i> FEMA has assigned specific Preparedness Officers for the THSGP. If you do not know your Preparedness Officer, please contact THSGP by e-mail at fema-thsgp@fema.dhs.gov.</p> <p>b. <i>FEMA Grants News</i> 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 fema-grants-news@fema.dhs.gov OR (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET.</p> <p>c. <i>Grant Programs Directorate (GPD) Award Administration Division</i> GPD’s Award Administration Division (AAD) provides support regarding financial matters and budgetary technical assistance. AAD can be contacted at ASK-GMD@fema.dhs.gov.</p> <p>d. <i>FEMA Regional Offices</i> FEMA Regional Offices also may provide fiscal support, including pre- and post-award administration and technical assistance. FEMA</p>

	<p>Regional Office contact information is available at https://www.fema.gov/fema-regional-contacts.</p> <p>e. Civil Rights Consistent with Executive Order 14173, <i>Ending Illegal Discrimination & Restoring Merit-Based Opportunity</i>, 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>f. Environmental Planning and Historic Preservation The FEMA office of Environmental Planning and Historic Planning (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 FEMA-OEHP-NOFOQuestions@fema.dhs.gov.</p> <p>g. FEMA GO For technical assistance with the FEMA GO system, please contact the FEMA GO Helpdesk at femago@fema.dhs.gov or (877) 585-3242, Monday through Friday, 9:00 AM – 6:00 PM ET.</p> <p>h. FEMA Preparedness Toolkit The FEMA Preparedness Toolkit (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 support@preptoolkit.fema.dhs.gov.</p> <p>i. Preparedness Grants Manual Recipients seeking guidance on policies and procedures for managing preparedness grants should reference the Preparedness Grants Manual at Preparedness Grants Manual.</p>
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2. Eligibility

A. Eligible Entities/Entity Types	<p>Only the following entities or entity types are eligible to apply.</p> <p>a. Applicants</p> <p>1. Eligible Applicants</p>
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	<p>Directly eligible tribes. “Directly eligible tribe” is defined below.</p> <p>2. Applicant Eligibility Criteria</p> <p>To be eligible to receive THSGP funding, recipients must be directly eligible tribes. Directly eligible tribes are federally recognized tribes that meet the criteria set forth in Section 2001 of the Homeland Security Act of 2002 (codified as amended at 6 U.S.C. § 601(4)).</p> <p>Federally recognized tribes are those tribes appearing on the list published by the Secretary of the Interior pursuant to the Federally Recognized Indian Tribe List Act of 1994, Pub. L. No. 103-454 (codified as amended at 25 U.S.C. § 5131).</p> <p>Per 6 U.S.C. § 601(4), a “directly eligible tribe” is any federally recognized Indian Tribe that meets the following criteria:</p> <p>“(A) any Indian Tribe—</p> <ul style="list-style-type: none"> (i) that is located in the continental United States; (ii) that operates a law enforcement or emergency response agency with the capacity to respond to calls for law enforcement or emergency services; (iii) <ul style="list-style-type: none"> (I) that is located on or near¹ an international border or a coastline bordering an ocean (including the Gulf of Mexico)² or international waters; (II) that is located within 10 miles of a system or asset included on the prioritized critical infrastructure list established under section 664(a)(2) of this title or has such a system or asset within its territory; (III) that is located within or contiguous to 1 of the 50 most populous metropolitan statistical areas in the United States; or (IV) the jurisdiction of which includes not less than 1,000 square miles of Indian country, as that term is defined in section 1151 of title 18; and
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¹ By policy, FEMA defines “on or near” to be within 100 miles.

² In accordance with Executive Order #14172 “[Restoring Names That Honor American Greatness](#)” the “Gulf of Mexico” is renamed the “Gulf of America”.

	<p>(iv) that certifies to the Secretary that a State has not provided funds under section 604³ or 605⁴ of this title to the Indian Tribe or consortium of Indian Tribes for the purpose for which direct funding is sought; and</p> <p>(B) a consortium of Indian Tribes if each tribe satisfies the requirements of subparagraph (A).”</p> <p>In summary, directly eligible tribes must meet each of the requirements set forth in (A)(i), (A)(ii), and (A)(iv). Tribes must also meet at least one of the requirements set forth in (A)(iii), that is either (A)(iii)(I), (A)(iii)(II), (A)(iii)(III), or (A)(iii)(IV). Finally, under subparagraph (B), a consortium may also be eligible to be a recipient if each Tribal Nation in the consortium meets the criteria for a directly eligible tribe under subparagraph (A).</p> <p>In FY 2025, applicants must self-certify as to whether they meet the eligibility requirements. Self-certification will be provided on the THSGP Eligibility Certification Form as part of the application Investment Justification (IJ). Additionally, DHS/FEMA will verify grant recipient eligibility against these criteria. Any questions regarding an applicant’s proximity to a Critical Infrastructure site, as described in the eligibility criteria, may be directed to FEMA Grants News by e-mail at fema-grants-news@fema.dhs.gov or by phone at (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET.</p> <p>b. Subapplicants Subapplicants and subawards are not allowed.</p>
B. Project Type Eligibility	<p>a. Unallowable Project Types See Section 3.F “Program-Specific Unallowable Costs” for more information on unallowable project types.</p> <p>b. Allowable Project Types Allowable costs generally must fall into the categories of planning, equipment, training, or exercises.</p> <p>Please see Appendix A: Allowable Costs for more information on allowable costs.</p> <p>If there are any questions regarding allowable costs, please contact the appropriate FEMA Headquarters (HQ) Preparedness Officer.</p>

³ Urban Area Security Initiative Grant Program, 6 U.S.C. § 604.

⁴ State Homeland Security Grant Program, 6 U.S.C. § 605.

<p>C. Requirements for Personnel, Partners, and Other Parties</p>	<p>An application submitted by an otherwise eligible non-federal entity (i.e., the applicant) may be deemed ineligible when the person that submitted the application is not: 1) a <i>current employee, personnel, official, staff, or leadership</i> of the non-federal entity; and 2) <i>duly authorized to apply</i> for an award on behalf of the non-federal entity at the time of application.</p> <p>Further, the Authorized Organization Representative (AOR) must be a duly authorized current employee, personnel, official, staff, or leadership of the recipient. <i>They must provide an email address unique to the recipient at the time of application and upon any change in assignment during the period of performance. Consultants or contractors of the recipient are not permitted to be the AOR of the recipient.</i></p>
<p>D. Maximum Number of Applications</p>	<p>The maximum number of applications that can be submitted is:</p> <ol style="list-style-type: none"> 1. One application per directly eligible Tribal Nation, with each application containing up to three IJs.
<p>E. Additional Restrictions</p>	<p>Applicants/subapplicants or recipients/subrecipients are required to certify their compliance with federal statutes, DHS directives, policies, and procedures.</p> <p>a. National Incident Management System (NIMS) Implementation Prior to allocation of any federal preparedness awards, recipients must ensure and maintain adoption and implementation of NIMS. The list of objectives used for progress and achievement reporting is on FEMA’s website at https://www.fema.gov/emergency-managers/nims/implementation-training.</p> <p>Please see the Preparedness Grants Manual for more information on NIMS.</p> <p>b. Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR) Development By December 31, 2026, as a condition of award, THSGP recipients are required to complete a THIRA/SPR that addresses all 32 core capabilities and is compliant with the Comprehensive Preparedness Guide (CPG) 201, Third Edition. The THIRA must be updated and resubmitted every three years while the award remains open. However, the SPR must be updated and submitted annually. For additional guidance on the THIRA/SPR, please refer to the CPG 201, Third Edition.</p>

	Please see the Preparedness Grants Manual for more information on the THIRA/SPR requirements.
F. References for Eligibility Factors within the NOFO	<p>Please see the following references provided below:</p> <ol style="list-style-type: none"> 1. “Responsiveness Review Criteria” subsection 2. “Financial Integrity Criteria” subsection 3. “Supplemental Financial Integrity Criteria and Review” subsection 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.
G. Cost Sharing Requirement	<p>There is no cost share requirement.</p> <p>Applicants that propose a cost share will not receive additional consideration in the scoring.</p>
H. Cost Share Description, Type and Restrictions	Not applicable.
I. Cost Sharing Calculation Example	Not applicable.
J. Required information for verifying Cost Share	Not applicable.

3. Program Description

A. Background, Program Purpose, and Program History

DHS is focused on the criticality of information sharing and collaboration to building a national culture of preparedness and protecting against terrorism and other threats to our national security. For FY 2025, DHS has identified five priority areas related to the most serious threats to the nation. Recipients are not required, but are encouraged, to address those priority areas with their THSGP funds.

For FY 2024, 49 applications were received from eligible Tribal Nations and 16 approved for funding based on a competitive review process. For a full list of recipients, please refer to [Information Bulletin \(IB\) 517a](#).

B. Goals, Objectives, and Priorities

Goals: The THSGP will provide funding directly to eligible Tribal Nations to strengthen their capacities to prevent, prepare for, protect against, and respond to potential terrorist attacks and other hazards.

Objectives: The THSGP provides resources that support eligible Tribal Nations in meeting the following objectives:

- Build and sustain core capabilities in accordance with annual program priorities;
- Address capability gaps identified in their THIRA and SPR process; and
- Implement a comprehensive and coordinated (all-inclusive) approach to address enduring security needs of communities that crosscut the homeland security enterprise, including planning, training and awareness campaigns, equipment and capital projects, and exercises.

Priorities: Given the evolving national security threat landscape, DHS/FEMA continuously evaluates the national risk profile and sets priorities that help inform appropriate allocation of scarce security dollars. In assessing the national risk profile for FY 2025, five areas attract the most concern and thus are national priority areas (NPAs):

- a. Enhancing the protection of soft targets and crowded places,
 - i. This includes faith-based organizations and election sites;
- b. Supporting Homeland Security Task Forces and fusion centers;
- c. Enhancing and integrating cybersecurity resiliency;
- d. Enhancing election security; and
- e. Supporting Border Crisis Response and Enforcement.
 - i. Example activities under border crisis response and enforcement support may include:
 1. Participation in the Department of Homeland Security/Immigration and Customs Enforcement 287(g) training program;
 2. Cooperation with Immigration and Customs Enforcement detainees; and
 3. Other jurisdictional responsibilities to support the enforcement of United States immigration law.

Tribal Nations are encouraged to review the [Strategic Framework for Countering Terrorism and Targeted Violence](#) when developing investments. Additional information about these priority areas and how they relate to anti-terrorism security is provided below.

a. NPA Investments

- **Enhancing the Protection of Soft Targets/Crowded Places**

Soft targets and crowded places, like parks, shopping centers, transportation hubs, and event venues, are increasingly appealing to terrorists because of their accessibility and the large gatherings. These areas often lack strict security measures, making them vulnerable. To address this, public and private sectors must collaborate to strengthen the security of locations such as transportation centers, restaurants, polling places, and similar facilities. Personnel responding to incidents at these sites should also be trained in key operational systems, such as the [National Incident Management System](#), to ensure effective on-scene incident management.

In addition, the malicious use of unmanned aircraft systems (drones) poses safety and security risks to soft targets and crowded places. Detecting drones is an allowable use of

funds under the THSGP in accordance with [Executive Order 14305](#), *Restoring American Airspace Sovereignty*, which allows the purchase of unmanned aircraft systems (UAS) or equipment or services for the detection, tracking, or identification of drones and drone signals, and FEMA Information Bulletin 530. Before purchasing and deploying these systems, as outlined in EO 14305, recipients must:

- **Consult FEMA and Legal Experts:** Work with FEMA's Preparedness Officer and legal experts to ensure your policies and procedures comply with federal, state, and tribal laws regarding surveillance and communication.
- **Develop Standard Operating Procedures (SOPs):** Establish clear guidelines to ensure operations are conducted in a manner consistent with First and Fourth Amendment protections, and other applicable provisions of federal law.
- **Provide Training and Certification:** Ensure personnel operating UAS systems are properly trained and certified, in accordance with FEMA and Federal Aviation Administration standards.

Applicants are encouraged to submit an investment related to protecting soft targets/crowded places. The proposed investment will be subject to DHS/FEMA's evaluation of the effectiveness of the proposed investments. Tribal Nations are encouraged to engage DHS' Protective Security Advisors' for security assessments of soft targets to ensure that recommendations from those assessments are taken into consideration when allocating grant funding.

Additional Resources

Further guidance and resources for securing soft targets and crowded places can be found through the [Cybersecurity and Infrastructure Security Agency \(CISA\)](#) and the [National Institute of Standards and Technology](#). For comprehensive compliance and operational details, refer to FEMA's [Preparedness Grants Manual](#) and related program documents.

- **Supporting Homeland Security Task Forces and Fusion Centers**

This priority supports the Administration's direction under Executive Order 14159, *Protecting the American People Against Invasion*, which calls for the establishment of Homeland Security Task Forces (HSTFs) nationwide. These multi-agency teams—composed of federal and local law enforcement partners—are tasked with disrupting and dismantling transnational criminal organizations, targeting cross-border human smuggling and trafficking networks (especially those involving children), and using all appropriate law enforcement tools to support lawful immigration enforcement.

Activities under this NPA also enhance broader national efforts in:

- Counterterrorism
- Cybersecurity
- Border security
- Immigration enforcement
- Transnational organized crime
- Protection of economic and critical infrastructure

Allowable Costs:

Applicants may use grant funds for:

- Establishing or enhancing multi-agency HSTFs, including operational coordination centers
- Enhancing capabilities and integration with local fusion centers
- Procurement of technology or equipment to support surveillance, communications, and data analysis
- Development of standard operating procedures for information sharing, joint operations, and immigration enforcement coordination
- Personnel training, credentialing, and certification to improve interoperability and mission alignment
- Intelligence analysis, reporting, and suspicious activity monitoring
- Exercises and simulations focused on joint operations, intelligence sharing, or interdiction/disruption of criminal or smuggling networks
- Community engagement efforts to foster trust and encourage threat reporting

Additional resources and information regarding collaboration and information sharing are also available through the Department's [Office of Intelligence and Analysis](#).

- **Enhancing and Integrating Cybersecurity Resilience**

In today's interconnected world, increased connectivity brings greater risks, including the potential for adversaries and terrorists to exploit cyber vulnerabilities and disrupt critical systems. While not mandatory, applicants are encouraged to submit proposals for ongoing or high-priority cybersecurity projects. DHS/FEMA will evaluate these investments based on their effectiveness.

Cybersecurity investments should enhance the security and functioning of critical infrastructure and core capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

- **Enhancing Election Security**

In January 2017, DHS designated the infrastructure used to administer the nation's elections as critical infrastructure. This designation recognizes that the United States' election infrastructure is of such vital importance to the American way of life that its incapacitation or destruction would have a devastating effect on the country. Additionally, the [Homeland Threat Assessment 2024](#) indicates that electoral processes remain an attractive target for many adversaries.

Securing election infrastructure, ensuring its continued operation in the face of threats and harassment, advancing the safety of election officials, and protecting against foreign interference are national security priorities. Because threats to election systems are constantly evolving, defending these systems requires constant vigilance, innovation, and adaptation. By integrating the directives of [Executive Order 14248](#), *Preserving and Protecting the Integrity of American Elections*, into the Enhancing Election Security

NPA, THSGP recipients can ensure that their efforts contribute to a secure, transparent, and resilient electoral process, thereby reinforcing public trust and the integrity of democratic institutions

To further strengthen election integrity, Tribal Nations should:

- Prioritize compliance with the Voluntary Voting System Guidelines (VVSG) 2.0 established by the U.S. Election Assistance Commission;
- Complete testing through a Voting System Test Laboratory (VSTL) accredited by the Commission⁵;
- Utilize the U.S. Citizenship and Immigration Services' Systematic Alien Verification Entitlements system for the verification of anyone working at a polling place in any capacity is a U.S. Citizen.
- Demonstrate proof of compliance before accessing the full THSGP award—3% of the award will be withheld from drawdown until compliance is confirmed.

Additional resources and information regarding election security are available through the [Cybersecurity and Infrastructure Security Agency](#).

- **Supporting Border Crisis Response and Enforcement**

State and local law enforcement agencies are essential partners in safeguarding national security and public safety. Pursuant to [Executive Order 14159](#), *Protecting the American People Against Invasion*, it is the policy of the United States to enforce immigration laws against all inadmissible and removable aliens—particularly those who threaten the safety or security of the American people. This includes the efficient execution of these laws through lawful incentives and enhanced detention capabilities.

This NPA supports efforts that align with this policy and promote cooperation between local and federal partners. Projects may include, but are not limited to:

- Participation in the [DHS/ICE 287\(g\) program](#), allowing trained local officers to support ICE with immigration enforcement;
- Cooperation with ICE detainers and other jurisdictional responsibilities related to immigration enforcement; and
- Supportive activities such as officer training, technology, and information sharing, operational support, and community engagement.

b. Other FY 2025 Funding Priorities

⁵ [Federal Register: Preserving and Protecting the Integrity of American Elections](#)

In addition to the NPAs above, there are several enduring security needs that crosscut the homeland security enterprise. The following are second-tier priorities that help recipients implement a comprehensive approach to securing communities:

- Effective planning;⁶
- Training and awareness campaigns;
- Equipment and capital projects; and
- Exercises.

The table below provides a breakdown of these priority areas for the FY 2025 THSGP, showing both the core capabilities enhanced and lifelines supported, as well as examples of eligible project types for each area. More information on allowable investments can be found in Appendix A. THSGP applicants are not required, but are encouraged, to address these areas in their applications. However, as discussed in Section 4 of this funding notice, investments that sufficiently address one or more of the NPAs (enhancing the protection of soft targets/crowded places, supporting Homeland Security Task Forces and fusion centers, enhancing cybersecurity, enhancing election security, and supporting border crisis response and enforcement) will have their final review scores increased by a multiplier of 20%. The example project types in the table below are allowable to prepare for disasters unrelated to acts of terrorism as long as they also help achieve target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

FY 2025 THSGP Funding Priorities

All priorities in this table concern Safety and Security Lifelines

Priority Areas	Core Capabilities	Examples of Allowable Activities
National Priorities		
Enhancing Cybersecurity	<ul style="list-style-type: none"> • Cybersecurity • Intelligence and information sharing • Planning • Public information and warning • Operational coordination • Screening, search, and detection • Access control and identity verification • Supply chain integrity and security • Risk management for protection programs and activities • Long-term vulnerability reduction • Situational assessment • Infrastructure systems • Operational communications 	<ul style="list-style-type: none"> • Cybersecurity risk assessments • Projects that address vulnerabilities identified in cybersecurity risk assessments <ul style="list-style-type: none"> ◦ Improving cybersecurity of critical infrastructure to meet minimum levels identified by the Cybersecurity and Infrastructure Security Agency and the National Institute of Standards and Technology Cybersecurity Framework (Version 1.1) ◦ Adoption of cybersecurity performance goals (CISA's Cross-Sector Cybersecurity Performance Goals) • Cybersecurity training and planning
Enhancing the Protection of Soft	<ul style="list-style-type: none"> • Operational coordination • Public information and warning • Intelligence and information sharing 	<ul style="list-style-type: none"> • Physical security enhancements <ul style="list-style-type: none"> ◦ Security cameras (closed-circuit television [CCTV])

⁶ Including assessment of critical infrastructure system vulnerabilities and plans to reduce consequences of disruptions, using the Infrastructure Resilience Planning Framework and Regional Resiliency Assessment Methodology produced by the Cybersecurity and Infrastructure Security Agency.

Priority Areas	Core Capabilities	Examples of Allowable Activities
Targets/Crowded Places	<ul style="list-style-type: none"> • Interdiction and disruption • Screening, search, and detection • Access control and identity verification • Physical protective measures • Risk management for protection programs and activities 	<ul style="list-style-type: none"> ○ Security screening equipment for people and baggage ○ Lighting ○ Access controls • Fencing, gates, barriers, etc.
Supporting Homeland Security Task Forces and Fusion Centers	<ul style="list-style-type: none"> • Intelligence and information sharing • Interdiction and disruption • Planning • Public information and warning • Operational coordination • Risk management for protection programs and activities 	<ul style="list-style-type: none"> • Information sharing with all DHS components; fusion centers; other operational, investigative, and analytic entities; and other federal law enforcement and intelligence entities • Cooperation with DHS and other entities in intelligence, threat recognition, assessment, analysis, and mitigation • Identification, assessment, and reporting of threats of violence • Joint intelligence analysis training and planning with DHS officials and other entities designated by DHS
Enhancing Election Security	<ul style="list-style-type: none"> • Cybersecurity • Intelligence and information sharing • Planning • Long-term vulnerability reduction • Situational assessment • Infrastructure systems • Operational coordination • Community resilience 	<ul style="list-style-type: none"> • Physical security planning support • Physical/site security measures (e.g., locks, shatter proof glass, alarms, access controls, etc.) • General election security navigator support • Cyber navigator support • Cybersecurity risk assessments, training, and planning • Projects that address vulnerabilities identified in cybersecurity risk assessments • Iterative backups, encrypted backups, network segmentation, software to monitor/scan, and endpoint protection • Distributed Denial of Service protection • Online harassment and targeting prevention services • Public awareness/preparedness campaigns discussing election security and integrity measures • Prioritize compliance with the VVSG 2.0 established by the U.S. Election Assistance Commission • Complete testing through a VSTL accredited by the U.S. Election Assistance Commission
Supporting Border Crisis Response and Enforcement	<ul style="list-style-type: none"> • Training and awareness • Community resilience • Operational coordination • Risk management for protection programs and activities 	<ul style="list-style-type: none"> • Staffing support to expand 287(g) screening operations within correctional facilities • Operational overtime costs directly tied to 287(g) screening, processing, and enforcement activities • Training programs for law enforcement officers in immigration law, civil rights protections, and 287(g) procedures • Development or enhancement of information-sharing platforms between ICE and tribal law enforcement • Procurement of screening, detection, and communications technology to support immigration enforcement activities • Establishing secure and dedicated communication networks with ICE Field Offices

Priority Areas	Core Capabilities	Examples of Allowable Activities
		<ul style="list-style-type: none"> • Conducting joint training exercises with ICE and tribal law enforcement to test operational coordination • Support for facilities upgrades, such as creating dedicated interview rooms and secure processing spaces • Community engagement and public briefings to promote transparency and understanding of 287(g) operations and protections
Enduring Needs		
Planning	<ul style="list-style-type: none"> • Planning • Risk management for protection programs & activities • Risk & disaster resilience assessment • Threats and hazards identification • Operational coordination • Community resilience 	<ul style="list-style-type: none"> • Development of: <ul style="list-style-type: none"> ◦ Security Risk Management Plans ◦ Continuity of Operations Plans ◦ Response Plans • Efforts to strengthen governance integration between/among regional partners • Joint training and planning with DHS officials and other entities designated by DHS • Cybersecurity training and planning • Revision of existing plans to strengthen community resilience in vulnerable communities
Training & Awareness	<ul style="list-style-type: none"> • Long-term vulnerability reduction • Public information & warning • Operational coordination • Situational assessment • Community resilience 	<ul style="list-style-type: none"> • Active shooter training • SAR and terrorism indicators/behaviors training • Security training for employees • Public awareness/preparedness campaigns • Joint training and planning with DHS officials and other entities designated by DHS • Cybersecurity training and planning • Sharing and leveraging intelligence and information • Targeted outreach and preparedness training for vulnerable communities in conjunction with community-based organizations
Equipment & Capital Projects	<ul style="list-style-type: none"> • Long-term vulnerability reduction • Infrastructure systems • Operational communications • Interdiction & disruption • Screening, search & detection • Access control & identity verification • Physical protective measures 	<ul style="list-style-type: none"> • Protection of high-risk, high-consequence areas or systems that have been identified through risk assessments • Physical security enhancements • Security cameras (CCTV) • Security screening equipment for people and baggage • Lighting • Access controls • Fencing, gates, barriers, etc. • Enhancing Weapons of Mass Destruction and/or improvised explosive device prevention, detection, and response capabilities • Chemical Biological Radiological Nuclear, and Explosive detection, prevention, and response equipment
Exercises	<ul style="list-style-type: none"> • Long-term vulnerability reduction • Operational coordination • Operational communications 	<ul style="list-style-type: none"> • Response exercises, including exercise planning with community-based organizations

Priority Areas	Core Capabilities	Examples of Allowable Activities
	<ul style="list-style-type: none"> Community resilience 	

DHS/FEMA require THSGP recipients to complete the THIRA and SPR, and to prioritize grant funding to support building capability and/or closing capability gaps or sustaining capabilities that address national priorities and/or support enduring needs. Additional information on the THIRA/SPR process, including other National Preparedness System tools and resources, can be found at [National Preparedness System | FEMA.gov](#).

C. Program Rationale

The stated goals, objectives, and priorities of THSGP support Section 2005 of the *Homeland Security Act of 2002*, Pub. L. No. 107-296 (codified as amended at 6 U.S.C. § 606).

D. Federal Assistance Type Grant

E. Performance Measures and Targets

Performance metrics for this program are as follows:

- Percentage of high priority capabilities, as identified by Tribal Nations in their THIRA/SPR submissions, that are built or sustained prior to award closeout (50%);
- Percentage of projects that address one or more capability gaps identified by Tribal Nations in their THIRA/SPR submissions (25%);
- Percentage of projects that address one or more of the NPA (10%).

FEMA will calculate and analyze the above metrics through a review of recipient SPR submissions and required programmatic reports/award monitoring to ensure that the funds are expended for their intended purpose and achieve the stated outcomes in the grant application.

F. Program-Specific Unallowable Costs

Grant funds may not be used for the purchase of equipment not approved by FEMA. This includes, but is not limited to, the use of grant funds for the purchase of the following equipment: firearms; ammunition; grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons installed.

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, the [Preparedness Grants Manual](#), 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. See [2 C.F.R. § 200.403\(h\)](#).

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

- Matching or cost sharing requirements for other federal grants and cooperative agreements (see [2 C.F.R. § 200.306](#)).
- 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](#)).

See the [Preparedness Grants Manual](#) for more information on funding restrictions and allowable costs.

H. Indirect Costs (Facilities and Administrative Costs)

Indirect costs are allowed for recipients.

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 wish to charge the de minimis rate must reach out to FEMA for further instructions. Applicants who wish to use a cost allocation plan in lieu of an IDC rate proposal must reach out 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.

See the [Preparedness Grants Manual](#) for more information on establishing indirect cost rates.

I. Management and Administration (M&A) Costs

M&A costs are allowed.

M&A costs are allowed by the 2025 DHS Appropriations Act (*See, Full-Year Continuing Appropriations and Extensions Act, 2025*, Pub. L. No. 119-4, § 1101). Recipients may use up to 5% of the amount of the award for M&A. Where applicable, subrecipients may use up to 5% of the amount they receive for M&A. M&A activities are those defined as directly relating to the management and administration of THSGP funds, such as financial management and monitoring. M&A expenses must be based on actual expenses or known contractual costs. M&A requests that are simple percentages of the award, without supporting justification, will not be allowed or considered for reimbursement.

M&A costs are not overhead costs but are necessary 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.

Other M&A costs examples include preparing and submitting required programmatic and financial reports, establishing and/or maintaining equipment inventory, documenting operational and equipment expenditures for financial accounting purposes, responding to official informational requests from state and federal oversight authorities, including completing the Civil Rights Evaluation Tool as required by DHS, and grant performance measurement or

evaluation activities. Reasonable costs of grant management training are also allowable. If an applicant uses an outside consultant or contractor to provide pre-award grant writing services or post-award grant management services, additional considerations and restrictions shall apply as detailed in the Appendix A.

J. Pre-Award Costs

The following pre-award costs are allowable:

1. Pre-award grant writing services provided by an independent contractor that shall not exceed \$1,500 per applicant for recipients

Pre-award costs are otherwise not allowable and will not be approved.

K. Beneficiary Eligibility

There are no program requirements for Beneficiary Eligibility. This NOFO and any subsequent federal awards create no rights or causes of action for any beneficiary.

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 2005 of the *Homeland Security Act of 2002*, Pub. L. No. 107-296 (codified as amended at 6 U.S.C. § 606).

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

See the [Preparedness Grants Manual](#) for more information on prohibitions on expending funds on covered telecommunications and surveillance equipment and services.

4. Application Contents and Format

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

Not applicable.

B. Application Content and Format

Not applicable.

C. Application Components

The following forms or information are required to be submitted via FEMA GO. Applicants can complete these forms directly in FEMA GO without needing to upload PDF versions of the forms. 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)
 - For construction under an award, submit SF-424C, Budget Information (Construction), in addition to or instead of SF-424A
- SF-424B, Standard Assurances (Non-Construction)
 - For construction under an award, submit SF-424D, Standard Assurances (Construction), in addition to or instead of SF-424B
- 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](#):

- THSGP Investment Justification (Office of Management and Budget [OMB] Control Number: 1660- 0113/FEMA Form: 089-22), which is located in the “Related Documents” tab on Grants.gov; and
- Self-certification form stating the Tribal Nation’s eligibility per the Homeland Security Act of 2002, as amended (the self-certification is contained within the THSGP IJ).

E. Post-Application Requirements for Successful Applicants

a. *Grant Agreement and Acceptance*

Recipients must review, sign, and return the grant agreement to formalize acceptance of the award and its terms.

b. *Additional Application Material*

With FEMA's approval, applicants may submit certain required information post award. For detailed guidance, please refer to the award letter or contact your assigned FEMA HQ Preparedness Officer.

c. *General Information About Post-Federal Award Reporting Requirements*

Award recipients must submit the following reports: quarterly financial reports, semi-annual performance reports and BSIR submissions, final financial and performance reports, and an annual audit report (if required). These must follow the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, found at [2 C.F.R. Part 200](#), or specific conditions of the award. If reports are late, future funding or fund access may be delayed, and additional reports may be requested in some cases, pursuant to 2 C.F.R. § 200.339.

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;
- d. Register for, update, or verify their 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 an 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 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 Unique Entity Identifier (UEI) number, Employer Identification Number (EIN), and an active System for Award Management (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](https://sam.gov).

Obtain Employer Identification Number:

In addition to having a UEI number, all entities applying for funding must provide an Employer Identification Number (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.

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:

Google Chrome;

Mozilla Firefox;

Apple Safari; and

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 on 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

08/15/25 05:00:00 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 their FEMA Preparedness Officer or the FEMA GO Helpdesk. 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

Only directly eligible tribes as defined in Section 2.A. “Eligible Entities/Entity Types” are authorized to submit THSGP applications to FEMA. This section highlights the specific criteria that determine ineligibility, ensuring applicants understand and adhere to the program’s requirements.

a. *Entities Ineligible for THSGP Funding*

- **Entities that do not meet the “directly eligible tribe” definition.**
- **Unaffiliated or Unauthorized Representatives** - Applications submitted by individuals who are not 1) a *current employee, personnel, official, staff, or leadership* of the non-federal entity; and 2) *duly authorized to apply* for an award on behalf of the non-federal entity at the time of application (e.g., consultants or contractors acting on behalf of an organization) will be deemed ineligible.
- **Organizations Not Registered in SAM.gov** - Applicants that fail to register and maintain an active profile in SAM.gov, or those without a UEI, are not eligible to receive funding.

b. *Ineligible Projects*

- Projects that do not align with the purposes of the THSGP, including those that fail to demonstrate a clear nexus to preventing, preparing for, protecting against, or responding to acts of terrorism.
- Activities not permitted under THSGP guidance or that do not meet criteria for allowable costs as outlined in the NOFO and Preparedness Grants Manual.

c. *Non-Compliance with Federal Requirements*

- Failure to submit a complete and accurate application by the deadline.
- Applications missing required documentation or information, such as an active registration in SAM.gov or compliance with UEI requirements.
- Entities with a history of non-compliance with federal statutes, regulations, or program requirements that impact eligibility for federal funding.

B. Application Criteria

a. *Programmatic Criteria*

FY 2025 THSGP applications will undergo a three-part review and selection process:

1. FEMA HQ Preparedness Officers will first review applications to confirm eligibility. This involves verifying:

- Submission of the self-certification form confirming the Tribal Nation’s eligibility under the Homeland Security Act of 2002, as amended (see Section 2, “Eligibility”);
- Accuracy of the information in the self-certification form;
- Allowability of activities under each investment; and
- Compliance with all administrative criteria in this funding notice, including timely submission of an IJ.

2. Eligible and complete applications will next be scored for each proposed investment based on four criteria:

- Overview: Description of the investment;
- Baseline: Goals, objectives, and capabilities of the investment;
- Project Management and Milestones: Funding amount, core capabilities, and projects; and
- Accomplishments and Impacts: Expected outcomes.

3. FEMA HQ Grants Management Specialists will conduct a financial review of the highest-scoring investments using the following criteria:

- Allowability, allocability, and financial reasonableness of the proposed budget and investment information; and
- Compliance with financial and legal requirements outlined in 2 C.F.R. Part 200.

b. Review and Selection Process

Reviewers will analyze and score the anticipated effectiveness of each proposed investment based on completeness and adherence to programmatic guidelines. Each investment will be scored individually using six questions to evaluate how well it addresses the four criteria outlined in the IJ template: Overview, Baseline, Project Management and Milestones, and Accomplishments and Impact.

The questions the reviewers will score are:

1. Overview Section (5 possible points)
 - How well are the activities described, including any activities that include planning, organization, equipment, training and/or exercises?
2. Baseline Section (5 possible points)
 - How well does this identify existing capability levels and address capability gaps?
3. Project Management and Milestones Section (15 possible points)
 - How well does the activity support the selected core capabilities outlined in the National Preparedness Goal?
 - Does the budget narrative provide a clear explanation of why funds are needed and the outcomes the recipient wants to achieve?
 - Will the projects/activities achieve progress during the grant's period of performance towards achieving the investment?
4. Accomplishments and Impact Section (5 possible points)
 - Does the outcome(s) demonstrate progress towards building the capability gap(s) identified in the investment?

DHS/FEMA will use the results of the review process to make funding recommendations to the Secretary of Homeland Security. Final funding determinations will be made by the Secretary of Homeland Security.

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:

1. 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\(a\)\(2\)](#).
2. An applicant may review and comment on any information in the responsibility/qualification records available in SAM.gov.
3. 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

A panel of reviewers will analyze and score the investments from all applications that the FEMA HQ Preparedness Officers determine to be complete and eligible. DHS/FEMA will assign reviewers **who shall have direct experience working with Tribal Nations and tribal professionals** and must also meet at least one of the following additional criteria:

- Federal employees experienced in a variety of disciplines, including homeland security, preparedness, emergency management, law enforcement, fire and rescue, etc.; and/or
- Familiar with applications for funding and the application review process.

F. Merit Review Process

Each of the six questions scored by reviewers is worth up to five points. Reviewers will use their subject matter expertise to assign a score from 1 to 5 for each question and provide comments to justify their scores. Each investment will be reviewed by at least two reviewers. THSGP program staff will facilitate a panel review session to discuss individual review results and reach a consensus on scores and comments. These consensus scores will determine the final scores for each investment.

Reviewers will use the following scoring scale to assess how well the information provided in each investment answers the question being scored:

- 1 = Little to None
- 2 = Inadequate

- 3 = Adequate
- 4 = Substantial
- 5 = Strong

The final score for each proposed investment is calculated by normalizing the scores from the six investment questions. This is done by averaging the six scores, dividing the average by five, and multiplying the result by 100. For example, if an investment received the following scores for the six questions:

- Question 1: 2
- Question 2: 3
- Question 3: 5
- Question 4: 5
- Question 5: 3
- Question 6: 5

The sum of the scores is 23, and the average score is 3.8. The average score, 3.8, is then divided by 5, and the result is multiplied by 100. The resulting normalized score is 76.67.

Investments that *sufficiently address one or more of the National Priorities will receive an additional 20% score increase* to the overall average normalized score for each investment submitted.

In addition, applicants who have not received funding in prior years will receive five additional points that will be added to the overall average normalized score for each investment submitted.

G. Final Selection

Final investment scores will be sorted in descending order, and investments will be recommended from highest to lowest until FY 2025 THSGP funding is exhausted. In the event of a tie, DHS/FEMA will prioritize the tribal entity proposing an investment aligned with one of the National Priorities. If a tie remains, priority will be given to the tribal entity that has not received funding in previous years.

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, the [Preparedness Grants Manual](#), 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 60 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
The funds are obligated only when and once the agency's signatory authority approves and signs the award package.

E. Notification to Unsuccessful Applicants
Unsuccessful Applicants will be notified through the FEMA GO system after all successful awards have been made, but not sooner than October 1st of this award cycle. Applicants may contact the program office for additional feedback.

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.

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 date 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.

C. Financial Reporting Requirements

See the [Preparedness Grants Manual](#) for information on financial reporting requirements.

D. Programmatic Performance Reporting Requirements

Recipients are required to submit Performance Progress Reports (PPRs) on a bi-annual basis. See the [Preparedness Grants Manual](#) for information on performance reporting requirements.

E. Closeout Reporting Requirements

See the [Preparedness Grants Manual](#) for information on closeout reporting requirements and administrative closeout.

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

See the [Preparedness Grants Manual](#) for information on disclosing information per 2 C.F.R. § 180.

G. Reporting of Matters Related to Recipient Integrity and Performance

See the [Preparedness Grants Manual](#) for information on reporting of matters related to recipient integrity and performance.

H. Single Audit Report

See the [Preparedness Grants Manual](#) for information on single audit reports.

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.

See the [Preparedness Grants Manual](#) for more information on monitoring and oversight.

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 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

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 and the term and condition in Paragraph C.XL of the FY 2025 DHS Standard Terms and Conditions, v.3 does not.

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 the 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 the 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 the 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 Appeal

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." [31 C.F.R. § 205.33\(a\)](#). 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 a subrecipient?
 - If **no**, include statement “This grant funding is not being directed to a subrecipient.”
 - If **yes**, provide the following details:
 - The name, mission statement, and purpose of each subrecipient receiving funds, along with the amount allocated and the specific role or activity being reimbursed.
 - Whether the subrecipient’s work or mission involves supporting aliens, regardless of whether FEMA funds support such activities.
 - Whether the payment request includes an activity involving support to aliens.
 - 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 C.F.R 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.

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.

See the [Preparedness Grants Manual](#) for more information on period of performance extensions.

B. Other Information

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

See the [Preparedness Grants Manual](#) for information on EHP compliance.

b. *Procurement Integrity*

See the [Preparedness Grants Manual](#) for information on procurement integrity.

c. *Financial Assistance Programs for Infrastructure*

1. Recipients and subrecipients must comply with FEMA's implementation requirements of the Build America, Buy America Act (BABAA), which was enacted as part of the [Infrastructure Investment and Jobs Act §§ 70901-70927, Pub. L. No. 117-58 \(2021\)](#); and [Executive Order 14005, Ensuring the Future is Made in All of America by All of America's Workers](#). See also [2 C.F.R. Part 184, Buy America Preferences for Infrastructure Projects](#) and [Office of Management and Budget \(OMB\), Memorandum M-24-02, Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure](#).

None of the funds provided under this program may be used for a project for infrastructure unless the iron and steel, manufactured products, and construction materials used in that infrastructure are produced in the United States.

The Buy America preference only applies to articles, materials, and supplies that are consumed in, incorporated into, or affixed to an infrastructure project. As such, it does not apply to tools, equipment, and supplies, such as temporary scaffolding, brought to the construction site and removed at or before the completion of the infrastructure project. Nor does a Buy America preference apply to equipment and furnishings, such as movable chairs, desks, and portable computer equipment, that are used at or within the finished infrastructure project but are not an integral part of the structure or permanently affixed to the infrastructure project.

To see whether a particular FEMA federal financial assistance program is considered an infrastructure program and thus required to implement FEMA's Build America, Buy America requirements, please see [Programs and Definitions: Build America, Buy America Act | FEMA.gov](#).

2. Waivers

When necessary, recipients (and subrecipients through their pass-through entity) may apply for, and FEMA may grant, a waiver from these requirements.

A waiver of the domestic content procurement preference may be granted by the agency awarding official if FEMA determines that:

- Applying the domestic content procurement preference would be inconsistent with the public interest, or
- The types of iron, steel, manufactured products, or construction materials are not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality, or
- The inclusion of iron, steel, manufactured products, or construction materials produced in the United States will increase the cost of the overall project by more than 25%.

The process for requesting a waiver from the Buy America preference requirements can be found on FEMA's website at: ["Buy America" Preference in FEMA Financial Assistance Programs for Infrastructure | FEMA.gov](#).

3. Definitions

For definitions of the key terms of the Build America, Buy America Act, please visit [Programs and Definitions: Build America, Buy America Act | FEMA.gov](#).

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 C.F.R. § 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

See the [Preparedness Grants Manual](#) for information on record retention.

g. Actions to Address Noncompliance

See the [Preparedness Grants Manual](#) for information on actions to address noncompliance.

h. Audits

See the [Preparedness Grants Manual](#) for information on audits.

11. Appendix A: Allowable Costs

A. Planning

Planning costs are allowed under this program only as described in this funding notice and Chapter 8 of the [Preparedness Grants Manual](#).

Planning efforts can include prioritizing needs; conducting risk and resilience assessments on increasingly connected cyber and physical systems, on which security depends, using the Infrastructure Resilience Planning Framework and related CISA resources; updating preparedness strategies; and allocating resources across stakeholder groups (e.g., law enforcement, fire, emergency medical services, health care systems, public health, behavioral health, public works, rural water associations, agriculture, information technology, emergency communications, and the general public, including people with disabilities) and levels of government. Planning provides a methodical way to engage the whole community in thinking through the life cycle of potential crises, determining required capabilities, and establishing a framework for roles and responsibilities. Planning must include participation from all stakeholders in the community who are able to contribute critical perspectives and may have a role in executing the plan. Planning should be flexible enough to address incidents of varying types and magnitudes.

Planning activities should focus on the prevention, protection, mitigation, and response mission areas outlined in the Goal. All jurisdictions are encouraged to work with Citizen Corps Whole Community Councils, nongovernmental entities, and the general public in planning activities. Whole community planning should integrate program design and delivery practices that ensure representation and services for vulnerable populations that may be more impacted by disasters including children, seniors, individuals with disabilities or other access and functional needs, individuals with varied backgrounds and language use, individuals with lower economic capacity and other vulnerable populations. Recipients must use the Comprehensive Preparedness Guide (CPG) 101 v3 in order to develop robust and effective plans.

For additional planning and resource information, please see:

1. FEMA CPG 101 v3 - https://www.fema.gov/sites/default/files/documents/fema_cpg-101-v3-developing-maintaining-eops.pdf
2. CISA Infrastructure Resilience Planning Toolkit - <http://www.cisa.gov/idr-program>
3. FEMA Citizen Corps - <http://www.ready.gov/citizen-corps>
4. FEMA CERT - <http://www.fema.gov/community-emergency-response-teams>
5. Ready.gov - www.ready.gov/
6. [Emergency Planning with Children](#)
7. [National Disaster Recovery Framework](#)

Additionally, THSGP funds may be used for planning activities related to 911 call capabilities, alert and warning capabilities, and implementation of the REAL ID Act (Pub. L. No. 109-13).

B. Organization

Organization costs are allowed under this program only as described in this funding notice and Chapter 8 of the [Preparedness Grants Manual](#).

Organizational activities may include, paying salaries and benefits for personnel, including individuals employed to serve as qualified intelligence analysts. Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant. Other organizational activities may include implementing standardized resource management concepts such as typing, inventorying, organizing, and tracking to facilitate the dispatch, deployment, and recovery of resources before, during, and after an incident.

Additionally, migrating online services to the “.gov” internet domain is an allowable expense.

C. Equipment

Equipment costs are allowed under this program only as described in this funding notice and Chapters 3 and 8 of the [Preparedness Grants Manual](#).

Recipients 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 must be identified and explained. For more information regarding property management standards for equipment, please reference 2 C.F.R. Part 200, including 2 C.F.R. §§ 200.310, 200.313, and 200.316. Also see 2 C.F.R. §§ 200.216, 200.471, and [FEMA Policy #405-143-1, Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services, issued May 10, 2022](#).

Recipients that are using THSGP funds to support emergency communications equipment activities must comply with the [SAFECOM Guidance on Emergency Communications Grants](#) (SAFECOM Guidance), including provisions on technical standards that ensure and enhance interoperable communications. See the [Preparedness Grants Manual](#) for more information.

Small Unmanned Aircraft Systems (sUAS) and critical emergency supply costs are allowable under this program. See the [Preparedness Grants Manual](#) for more information.

Additionally, THSGP funds may be used for equipment purchases related to 911 call capabilities, alert and warning capabilities, and implementation of the REAL ID Act (Pub. L. No. 109-13).

D. Construction and Renovation

Construction and renovation costs to achieve capability targets related to preventing, preparing for, protecting against, or responding to acts of terrorism are allowed under this program. All proposed construction and renovation activities must undergo an Environmental Planning and Historic Preservation (EHP) review, including approval of the review from FEMA, prior to undertaking any action related to the project. Failure of a grant recipient to meet these requirements may jeopardize Federal funding. For construction costs to be allowed, they must be specifically approved by DHS/FEMA in writing prior to the use of any program funds for

construction or renovation. Additionally, recipients are required to submit a SF-424C Form and Budget detail citing the project costs. See the [Preparedness Grants Manual](#) for additional information.

E. Training and Exercises

Training and exercise costs are allowed under this program only as described in this funding notice and Chapter 8 of the [Preparedness Grants Manual](#).

Tribal Nations are strongly encouraged to use THSGP funds to develop or maintain a homeland security training program. Allowable training-related costs under the THSGP include the establishment, support, conduct, and attendance of training specifically identified under the THSGP or in conjunction with emergency preparedness training by other federal agencies (e.g., the Department of Health and Human Services or the Department of Transportation). Training conducted using THSGP funds should address a performance gap identified through an assessment or contribute to building a capability that will be evaluated through a formal exercise. Exercises should be used to provide the opportunity to demonstrate and validate skills learned in training, as well as to identify training gaps. Any training or training gaps evaluated through a formal exercise, including those for vulnerable populations including children, the elderly, pregnant women, and individuals with disabilities or other access and functional needs should be identified in an AAR/IP.

All training and exercises conducted with THSGP funds should support the development and testing of the jurisdiction's Emergency Operations Plan (EOP), consistent with the priorities in the National Preparedness System. Recipients are encouraged to use existing training rather than developing new courses. When developing new courses, recipients are encouraged to apply the Analysis, Design, Development, Implementation, and Evaluation (ADDIE) model of instruction design, available with additional training information at [First Responder Training System](#) and [FRT-TRDC ADDIE \(firstrespondertraining.gov\)](#).

FEMA supports and encourages the coordination of all emergency preparedness training towards the achievement of the Goal. To this end, FEMA supports the establishment of a Tribal Training Point of Contact (TTPOC). The role of the TTPOC is to coordinate the Tribal Nations' training needs and activities with FEMA and FEMA's federal training partners and holds the same authority and roles that state training points of contact serve within SAAs nationwide. FEMA will coordinate with Tribal Training Officers (TTOs) as it relates to FEMA training when notified by recipients.

Recipients are encouraged to consider tuition-free courses offered by FEMA first, before investing in training. For more information and a catalog of courses please refer to the [National Preparedness Course Catalog at NTED](#).

For additional information on training and exercises under THSGP, please refer to Chapters 7 and 8 in the [Preparedness Grants Manual](#).

F. Personnel Activities

Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform allowable THSGP planning, training, exercise, and equipment activities.

Not more than 50% of total THSGP funds may be used for personnel activities as directed by the *Homeland Security Act of 2002*, as amended by the *Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act of 2008*, Pub. L. No. 110-412 (codified as amended at 6 U.S.C. §609(b)(2)(A)). This 50% cap may be waived, however, per 6 U.S.C. § 609(b)(2)(B). For further details, THSGP recipients should refer to [IB 421b](#), or contact their FEMA HQ Preparedness Officer. THSGP funds may not be used to support the hiring of any personnel for the purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities.

G. Travel

Domestic travel costs are allowed under this program, as provided for in this funding notice. International travel is not an allowable cost under this program unless approved in advance by DHS/FEMA.

H. Maintenance and Sustainment

Maintenance and sustainment costs are allowed under this program only as described in this funding notice and Chapter 3 of the [Preparedness Grants Manual](#).

I. Authorized Use of Contractual Grant Writers and/or Grant Managers

A grant applicant may procure the services of a contractor to provide support and assistance for pre-award grant development services (grant writing) or post-award grant management and administrative services (grant management). As with all federal grant-funded procurements, grant writer or grant management services must be procured in accordance with the federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327. See the [Preparedness Grants Manual](#) regarding Procurement Integrity, particularly the sections applicable to non-state entities that discuss organizational conflicts of interest under 2 C.F.R. § 200.319(b) and traditional conflicts of interest under 2 C.F.R. § 200.318(c)(1). States must follow the same policies and procedures it uses for procurements of its non-federal funds, pursuant to 2 C.F.R. § 200.317, which also applies 2 C.F.R. §§ 200.321, 200.322, 200.323, and 200.327.

As applicable to non-state entities, DHS/FEMA considers a contracted grant writer to be an agent of the recipient for any subsequent contracts the recipient procures under the same federal award for which the grant writer provided grant writing services. Federal funds and funds applied to the award's cost share generally cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of such specifications, unless the original contract was properly procured and included both grant writing and grant management services in the solicitation's scope of work.

As applicable to all non-federal entities, regardless of whether an applicant or recipient uses grant writing and/or grant management services, the recipient is solely responsible for the fiscal and programmatic integrity of the grant and its authorized activities and expenditures. The recipient must ensure adequate internal controls, including separation of duties, to safeguard

grant assets, processes, and documentation, in keeping with the terms and conditions of its award, including this funding notice, and 2 C.F.R. Part 200.

a. Grant Writers

Grant writing contractors may assist the applicant in preparing, writing, and finalizing grant application materials and assisting the applicant with handling online application and submission requirements in FEMA GO. Grant writers may assist in a variety of ways. Ultimately, however, the applicant that receives an award is solely responsible for all grant award and administrative responsibilities.

By submitting the application, applicants certify that all of the information contained therein is true and an accurate reflection of the organization and that regardless of the applicant's intent, the submission of information that is false or misleading may result in actions by DHS/FEMA. These actions include, but are not limited to, the submitted application not being considered for award, temporary withholding of funding under the existing award pending investigation, or referral to the DHS Office of Inspector General.

To assist applicants with the cost of grant writing services, DHS/FEMA is permitting a one-time pre-award cost of no more than \$1,500 per applicant per year for contractual grant writing services as part of the recipient's M&A costs. This is only intended to cover costs associated with a grant writer and may not be used to reimburse an applicant for its own time and effort in the development of a grant application. Additionally, the applicant may be required to pay this fee with its own funds during the application preparation and submission period. If the applicant subsequently receives an award, it may then request to be reimbursed once grant funds become available for that cost, not to exceed \$1,500. If the applicant does not receive an award, this cost will not be reimbursed by the Federal Government. The applicant must understand this risk and be able to cover this cost if an award is not made.

If an applicant intends to request reimbursement for this one-time pre-award cost, it must include this request in its application materials, including in the budget section in each IJ. Failure to clearly identify this as a separate cost in the application may result in its disallowance. This is the only pre-award cost eligible for reimbursement. Recipients must maintain grant writer fee documentation including, but not limited to, a copy of the solicitation, such as a quote request, rate request, invitation to bid, or request for proposals, if applicable; a copy of the grant writer's contract agreement; a copy of the invoice or purchase order; and a copy of the cancelled check or proof of payment. These records must be made available to DHS/FEMA upon request.

Consultants or contractors are not permitted to be the AOR of the recipient. Further, an application must be officially submitted by 1) a ***current employee, personnel, official, staff, or leadership*** of the non-federal entity; and 2) ***duly authorized to apply*** for an award on behalf of the non-federal entity at the time of application.

b. Grant Managers

Grant management contractors provide support in the day-to-day management of an active grant and their services may be incurred as M&A costs of the award. Additionally, grant recipients may retain grant management contractors at their own expense.

Consultants or contractors are not permitted to be the AOR of the recipient. The AOR, or Authorized Official, is responsible for submitting programmatic and financial performance reports, accepting award packages, signing assurances and certifications, and submitting award amendments.

c. Restrictions Regarding Grant Writers and Grant Managers

Pursuant to 2 C.F.R. Part 180, recipients may not use federal grant funds to reimburse any entity, including a grant writer or preparer, if that entity is presently suspended or debarred by the Federal Government from receiving funding under federally funded grants or contracts. Recipients must verify that a contractor is not suspended or debarred from participating in specified federal procurement or non-procurement transactions pursuant to 2 C.F.R. § 180.300. FEMA recommends recipients use SAM.gov to conduct this verification.

Further, regardless of whether any grant writer fees were requested, as applicable to non-state entities, unless a single contract covering both pre- and post-award services was awarded to the grant writer and procured in compliance with 2 C.F.R. §§ 200.317 – 200.327, federal funds cannot be used to pay the grant writer to provide post-award services.

J. Multiple Purpose or Dual-Use of Funds

Many activities that support the achievement of target capabilities related to terrorism preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. *See* 6 U.S.C. § 609(c). However, all THSGP-funded projects must assist recipients and subrecipients in achieving target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

K. Secure Identification

Secure identification project costs are allowed under this program only as described in this funding notice. THSGP funds may be used to support the development and production of enhanced tribal documents (e.g., Enhanced Tribal Cards) designed to meet the requirements of the Western Hemisphere Travel Initiative (WHTI). More information on the WHTI may be found at [Western Hemisphere Travel Initiative | Homeland Security \(dhs.gov\)](https://www.dhs.gov/wht) and [Western Hemisphere Travel Initiative | U.S. Customs and Border Protection \(cbp.gov\)](https://www.cbp.gov/wht).

When completing the IJ, refer to the National Preparedness Goal for a list of the core capabilities that best fit the proposed activities and costs. For additional assistance in determining the core capabilities that fit the proposed WHTI project, please contact FEMA Grants News at fema-grants-news@fema.dhs.gov OR by phone at (800) 368-6498.

L. Fidelity Bonds

Reasonable costs of fidelity bonds (or like insurance as provided for by applicable state or tribal laws) covering the maximum amount of THSGP funds the officer, official, or employee handles

at any given time for all personnel who disburse or approve disbursement of THSGP funds may be allowable if required by the terms and conditions of the award or if generally required by the Tribal Nation in its general operations. If a fidelity bond is required by a Tribal Nation in its general operations, those costs must be charged as indirect costs. *See* 2 C.F.R. § 200.427.