



Notice of Funding Opportunity (NOFO)

# EXBS Legal & Regulatory Support

Bureau of Arms Control and Nonproliferation, Department of State

Opportunity number: DFOP0018151

Application deadline: July 20, 2026

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**U.S Department of State**  
***Arms Control and Nonproliferation***  
**Notice of Funding Opportunity**

**A. Basic Information**

**1. Overview**

<b>Funding Opportunity Title</b>	EXBS Legal & Regulatory Support
<b>Funding Opportunity Number</b>	DFOP0018151
<b>Announcement Type</b>	Initial Announcement
<b>Deadline for Applications</b>	Monday, July 20, 2026, 23:59:59 EST
<b>Assistance Listing Number</b>	19.317
<b>Length of performance period</b>	12 to 24 months
<b>Number of awards anticipated</b>	1 award
<b>Award amounts</b>	The budget should not exceed the ceiling per line of effort (LOE), nor the total available funding.
<b>Total available funding</b>	\$2,441,589 pending availability of funds
<b>Type of Funding</b>	FY25/26 NADR Foreign Assistance FY24/28 CHIPS/ITSI Funds
<b>Anticipated project start date</b>	October 01, 2026

**Application Requirements**

Applicants must submit applications that address all lines of effort specified in this notice. Applications that do not cover all required lines of effort will be deemed non-responsive and disqualified from consideration.

**Subawards and Subrecipients**

The Department encourages applicants to utilize subawards and subrecipients to achieve program objectives. Applicants may partner with other organizations through subaward arrangements. Prime recipients remain responsible for overall program management, compliance, and reporting requirements for all subaward activities. All subaward arrangements must comply with 2 CFR 200 and Department of State requirements.

**Funding Instrument Type:** Cooperative agreement. Cooperative agreements include substantial involvement of the bureau or embassy in program implementation of the project. Examples of substantial involvement are included in section C below.

**Project Performance Period:** Proposed projects should be completed in 24 months or less.

**This notice is subject to availability of funding.**

## **2. *Executive Summary***

This NOFO addresses evolving nonproliferation threats across key nodes of the global strategic trade and technology ecosystems in Asia and Europe. In the Philippines, Cambodia, and Malaysia, the program responds to the risk that weak or incomplete export control and foreign direct investment screening systems could allow diversion of dual-use goods, advanced technologies, and critical minerals to proliferators or malign actors. In Taiwan, it tackles the threat that persistent, sophisticated networks will exploit gaps in supply chain, financial, and logistics controls to obtain the world's most advanced AI-relevant semiconductors and other dual-use technologies. In Türkiye, the program confronts documented diversion and transshipment risks posed by intermediary-dependent trade routes and the absence of widespread private-sector internal compliance programs that meet international expectations. In Ukraine, it addresses the heightened risk that rapidly expanding defense and dual-use innovation, combined with intense foreign interest and limited oversight mechanisms, could lead to unauthorized tangible and intangible technology transfers and diversion of U.S.-origin or sensitive items. Collectively, the LOEs seek to close these vulnerabilities by strengthening legal and regulatory frameworks, institutional and industry compliance, and data-driven enforcement capabilities to prevent the proliferation of WMD-related, defense, and other sensitive technologies to end-users and activities of concern.

## **B. Eligibility**

### **1. *Eligible Applicants***

The following organizations are eligible to apply:

The following U.S. or foreign organizations are eligible to apply:

- *Not-for-profit organizations, including think tanks and civil society/non-governmental organizations*
- *Public and private educational institutions*
- *For-profit organizations (only if allowed by appropriation - not for PD funds)*

Applications submitted by for-profit entities may be subject to additional review following the panel selection process. Additionally, the Department of State prohibits profit to for-profit or commercial organizations under its assistance awards. Profit is defined as any amount in excess of allowable direct and indirect costs. The allowability of costs incurred by commercial organizations is determined in accordance with the provisions of the Federal Acquisition Regulation (FAR) at 48 CFR 30, Cost Accounting Standards Administration, and 48 CFR 31 Contract Cost Principles and Procedures. Please see 2 CFR 200.307 for regulations regarding program income. For-profit recipients who do not have a formally established overhead or G&A rate should allocate indirect costs into the appropriate direct cost categories.

- *Public International Organizations and Governmental institutions*

## ***2. Cost Sharing or Matching***

The non-Federal share of costs, frequently called “cost share” or “matching costs”, refers to that portion of the project or program costs not borne by the Federal Government. This may include cash and third-party in-kind contributions. These costs must reflect the realistic capacity of the applicants and any third-party contributors.

Providing cost sharing, matching, or cost participation is not an eligibility factor or requirement for this NOFO and providing cost share will not result in a more favorable competitive ranking. Per 2 CFR §200.306, items that are proposed for cost share must be allowable per 2 CFR §200, Subpart E—Costs Principles.

Voluntary cost-share: Should the applicant choose to contribute voluntary cost-share, in the event the applicant does not meet the minimum amount of the voluntary cost-sharing stipulated in the applicant’s budget, DOS contribution may be reduced in proportion to the Applicant’s contribution.

## ***3. Other Eligibility Requirements***

All organizations must have a Unique Entity Identifier (UEI) issued via SAM.gov as well as a valid registration in SAM.gov. Please see Section D.3 for more information. Individuals are not required to have a UEI or be registered in SAM.gov.

## **C. Program Description**

### ***1. Goals and Objectives***

#### **LOE 1: Export Controls and Investment Screening in EAP (\$639,275)**

This line of effort covers three related components on export controls and investment screening in Cambodia, Malaysia, and the Philippines. Proposals should address each component and stay within budget estimates by component.

1a: Export Control, Legal & Regulatory, and Foreign Direct Investment Screening Support for Philippines (\$245,875.00)

This LOE seeks to strengthen the legal and regulatory frameworks governing the trade and transfer of dual-use goods, advanced technologies, and materials that could contribute to weapons proliferation in the Philippines. By enhancing Philippine export control policies and practices, the program will support the Government of the Philippines in modernizing its export control system

The initiative will:

- Refine the Philippines' licensing processes;
- Expand industry outreach to improve compliance with applicable laws and best international practices;
- Bolster enforcement capabilities;
- Enhance foreign direct investment (FDI) screening competencies, and
- Improve interagency coordination.

As the Philippines pursues amendments to its export control legislation, targeted support will be required to implement new rules and regulations, with a particular focus on enforcement and the integration of FDI screening mechanisms into export control processes. Engaging enforcement agencies, judges, prosecutors, and industry professionals will strengthen interagency processes to effectively identify, enforce, and prosecute export control violations while improving capability to review and mitigate FDI-related national security risks.

To achieve these objectives, the implementer, in consultation with EXBS and the Philippine Strategic Trade Management Office (STMO), may:

- Deliver targeted consultations on (1) implementing export controls rules and regulations to better define interagency coordination and authorities; and (2) FDI screening to ensure that the Philippine process for screening foreign direct investment is consistent with export control frameworks and national security objectives, and is effectively coordinated across the Philippine interagency
- Lead Senior Officials' Dialogues to educate senior officials on relevant export control and FDI screening processes, rules, and regulations, and to obtain buy in from senior decision makers; and/or
- Collaborate with STMO to advance industry outreach and compliance initiatives.

The implementer should plan to deliver the above engagements in-person and virtually, depending on guidance from EXBS.

This line of effort will enhance the legal and regulatory expertise of the Philippine STMO, support the drafting and implementation of legislation that incorporates U.S. and international best practices, and improve the ability of senior officials and industry stakeholders to identify and address potential export control violations and FDI-linked security concerns.

The implementer should have strong existing knowledge of the Philippine regulatory environment and experience working with the Philippines on export control and/or related issues.

This knowledge should help inform a starting point to address gaps in existing export control legislation, enforcement capacity, and FDI screening processes.

Data collection methods will include pre- and post-training assessments, participant feedback surveys, AARs, and progress reports submitted by the implementer.

Key performance indicators may include the number of new or revised export control regulations implemented; the number of government officials, enforcement personnel, and industry representatives trained; and the number of export control violations identified.

The implementer should budget for several in-person consultations to the Philippines to support these efforts.

Applicants should propose an innovative and effective set of activities based on the target funding amount, but be prepared to execute flexibly and adjust activity composition and timing based on U.S. government priorities and other factors during the period of performance. Creative approaches are imperative to achieve maximum impact for U.S. national security objectives.

Applicants should demonstrate that each proposed engagement will have a specified objective to support U.S. interests, associated indicators, and means for follow-up engagement (e.g., virtual, survey, etc.) to produce meaningful data on realized changes as well as enabling and limiting factors for unrealized changes."

#### **1b: Export Control, Legal & Regulatory Support for Cambodia (\$245,875.00)**

This line of effort aims to strengthen Cambodia's legal and regulatory frameworks for controlling the trade and transfer of dual-use goods, advanced technologies, and materials that could be used for WMD, related delivery systems, or advanced conventional weapons. Building on Cambodia's recent commitment to export control advancement—demonstrated by its leadership in hosting a high-level UNSCR 1540 technical consultation, developing ASEAN's first voluntary National Implementation Action Plan, and drafting an export control law—the project will support Cambodia in establishing export controls as a national priority, building institutional expertise, and fostering regional and international cooperation to prevent the proliferation of sensitive technologies and materials.

By helping Cambodia develop a robust export control system, this line of effort supports U.S. national security interests by reducing the risk that sensitive American-origin goods and technologies are diverted or illicitly transferred to proliferators or end-users of concern. Strengthening Cambodia's export control infrastructure also helps create a more secure and predictable environment for legitimate trade, benefiting American businesses operating in or exporting to the region.

The project will engage Cambodian stakeholders through a comprehensive series of activities, including senior official dialogues, interministerial committees, and technical working groups to help Cambodia pass and implement export control legislation and establish a robust legal foundation. Targeted training programs will build knowledge of best practices of export control

implementation, such as end-user risk assessment, control list implementation, licensing procedures, and interagency coordination. The project will also educate key government and industry stakeholders on export control enforcement principles to enhance Cambodia's capabilities to detect, interdict, investigate, and prosecute violations related to WMDs and sensitive technologies.

Moving from draft legislation to enacted law requires sustained engagement with Cambodia's legislative process and key decision-makers. While enactment during the period of performance is the goal, the implementer should recognize that legislative timelines can be unpredictable and design activities that advance Cambodia's export control capacity regardless of where the law stands in the approval process. The implementer must:

- Facilitate high-level advocacy to secure political commitment, working closely with the Council of Ministers and National Assembly to address concerns, build consensus, and maintain momentum
- Organize briefings for senior officials and/or lawmakers that clearly articulate the strategic, economic, and security benefits of export controls, as well as Cambodia's international obligations and reputational risks of inaction
- Draft supporting materials such as explanatory notes, policy briefs, and talking points that government champions can use to advocate for the law's passage
- Identify and address potential points of resistance—whether concerns about trade facilitation, administrative burden, or sovereignty—by demonstrating how modern export control systems can minimize disruption while maximizing security

In parallel with legislative advocacy, and in anticipation of eventual enactment, the implementer should support development of a comprehensive implementation framework and build institutional capacity across government and industry. These preparatory activities will position Cambodia to operationalize its export control system quickly once the law is enacted, while also building technical expertise and interagency relationships that support the legislative process itself. Key activities include:

- Supporting the development of implementing regulations, standard operating procedures, and interagency coordination mechanisms that clearly delineate roles and responsibilities among relevant ministries and agencies (customs, border security, commerce, foreign affairs, law enforcement)
- Facilitating interministerial working groups to develop practical tools including licensing application forms, control list guidance documents, risk assessment matrices, and case management systems
- Developing outreach strategies to the private sector, compliance guidance materials, and public-private dialogue forums that foster a culture of compliance

Baseline data will be established by reviewing relevant existing and draft legislation and through consultations with Cambodian officials and EXBS. From there, the grantee should identify specific gaps and suggest a timeline of events to address regulatory gaps. The grantee should



collect performance details through training attendance, meeting summaries, participant feedback surveys, and progress reports. Performance will be measured by:

- Number of formal legislative milestones achieved by the progression through Cambodia's legislative process with documented evidence of advancement as well as the number of senior officials and lawmakers championing the legislation;
- Completion and official adoption of key implementing documents and procedures;
- Formation of interministerial committee or working groups with clearly defined roles and responsibilities for each agency; number of coordination meetings held; documented evidence of information sharing and joint decision-making; and/or
- Level of industry understanding and engagement with export control requirements, such as the number of industry participants attending outreach activities.

The implementer should budget for several in-person consultations to Cambodia to support these efforts.

Applicants should propose an innovative and effective set of activities based on the target funding amount, but be prepared to execute flexibly and adjust activity composition and timing based on U.S. government priorities and other factors during the period of performance. Creative approaches are imperative to achieve maximum impact for U.S. national security objectives.

Applicants should demonstrate that each proposed engagement will have a specified objective to support U.S. interests, associated indicators, and means for follow-up engagement (e.g., virtual, survey, etc.) to produce meaningful data on realized changes as well as enabling and limiting factors for unrealized changes."

### **1c: Foreign Direct Investment Screening & Critical Minerals Supply Chain Security for Malaysia (\$147,525.00)**

This LOE seeks to strengthen foreign direct investment (FDI) screening governing the critical minerals and rare earth elements (REE) supply chain. This includes “upstream, midstream and downstream” industries associated with REE. Malaysia, as a key partner in the Indo-Pacific region, plays a vital role in global critical minerals supply chains and is a significant recipient of FDI in sectors relevant to U.S. technological and economic interests.

By enhancing Malaysia’s FDI screening policies and practices, the program will support U.S. access to critical minerals and bolster support for vital industries which rely on them, such as advanced semiconductors supporting AI chips, high-tech magnets, military hardware, and advanced batteries.

EXBS seeks an implementer with demonstrated prior experience on export control legislation development (with a preference for experience in Southeast Asia) to design and deliver one in-person technical consultation in Malaysia to:

1. **Strengthen Malaysia's FDI Screening Mechanisms:**

Support the development and implementation of transparent, effective, and risk-based FDI screening processes – built on international best practices - to identify and mitigate predatory or non-transparent investments, particularly in sectors involving critical minerals and sensitive technologies.

2. **Enhance Critical Minerals Supply Chain Security:**

Promote best practices and policy frameworks that secure Malaysia's critical minerals supply chains from malign influence, including through the effective implementation of Malaysia's Strategic Trade Act 2010, to ensure continued access for U.S. and allied industries.

3. **Secure U.S. Investment and Technological Advantage:**

Foster an enabling environment for U.S. investment in Malaysia's critical minerals sector, while protecting sensitive U.S. goods, technologies, and border infrastructure from predatory acquisition.

This technical consultation should convene participants from all major parts of the GOM interagency responsible for trade facilitation, foreign direct investment screening, critical mineral/REE mining and management, export and import control implementation, along with any other relevant department as determined by EXBS and the implementer.

The implementer should also, if feasible within the given budget, identify, design, and deliver at least one best practices study visit to the United States, Japan, or other country with advanced REE export control systems as determined by EXBS and the implementer. This study visit should provide a small high-level GOM delegation the opportunity to learn how the host country effectively implements trade controls for this sector.

### Expected Outcomes

- Increased transparency and resilience in Malaysia's critical minerals supply chains
- Improved capacity of Malaysian government agencies to screen and assess FDI for national security risks.
- Adoption of international best practices in supply chain security and investment screening.
- Enhanced bilateral cooperation between the United States and Malaysia on investment security and supply chain integrity.

Applicants should propose an innovative and effective set of activities based on the target funding amount, but be prepared to execute flexibly and adjust activity composition and timing based on U.S. government priorities and other factors during the period of performance.

Creative approaches are imperative to achieve maximum impact for U.S. national security objectives.

Applicants should demonstrate that each proposed engagement will have a specified objective to support U.S interests, associated indicators, and means for follow-up engagement (e.g., virtual, survey, etc.) to produce meaningful data on realized changes as well as enabling and limiting factors for unrealized changes."

## **LOE 2: Semiconductor, Financial, Logistics, and Related Industry Export Control Implementation in Taiwan (\$1,008,087.50)**

Taiwan produces the world's most advanced semiconductors used for AI, based on U.S.-origin technology. Preventing diversion and theft of this technology is critically important to U.S. interests given the defense and national security applications of AI, as well as the economic value of this technology to American companies. Other dual-use goods of proliferation concern, such as advanced machine tools, are also produced in Taiwan and distributed globally. Persistent threat actors use complex and multifaceted techniques to obfuscate their acquisition of such dual-use goods from Taiwan, placing the financial and logistics sectors of Taiwan as key focal points for detecting and preventing diversion. The goal of this LOE is to prevent the diversion of advanced semiconductors and other dual-use technologies from Taiwan to U.S. adversaries, which will enhance vital U.S. security, economic, and technological interests.

This project will contain two components. The first portion, with approximately \$515,000 of funding, will begin by conducting supply chain analysis of the advanced semiconductor supply chain. This may incorporate open-source information as well as use of databases such as Z2Data; applicants are welcome to demonstrate a differentiated approach. The project will then engage identified at-risk entities on export control compliance and complementary technology security mechanisms as needed.

The second component, with approximately \$490,000 of funding, will engage Taiwan authorities as well as audiences from the financial, logistics, and other relevant industries to strengthen measures for screening transactions and shipments based on export control requirements.

The high-level tasks outlined below are likely necessary steps to engage the audiences under this award. Applicants should propose an innovative and effective set of activities based on the target funding amount, but be prepared to execute flexibly and adjust activity composition and timing based on U.S. government priorities and other factors during the period of performance. Creative approaches are imperative to achieve maximum impact for U.S. national security objectives. Applicants should demonstrate that each proposed engagement will have a specified objective to support U.S interests, associated indicators, and means for follow-up engagement (e.g., virtual, survey, etc.) to produce meaningful data on realized changes as well as enabling and limiting factors for unrealized changes.

- Assess key risk factors for diversion and technology theft of dual-use goods from Taiwan to end-users of concern, and map commodity flows and relevant stakeholders.
- Engage relevant (e.g., via technical consultations or other engagements) government (e.g., strategic trade control, customs) and private/industry audiences to:

- Illustrate the economic and security risks of diverted dual-use technologies, especially AI chips, and risks associated with non-compliance with U.S. and Taiwan regulatory requirements;
- Effect implementation of sufficiently robust legal, regulatory, enforcement, and compliance mechanisms to deter, detect, prevent, and intercept diversion of dual-use goods.
- Propose a series of effectively tailored technical assistance activities such as technical consultations, exchanges, and/or study visits to the United States or a third country.
- Provide user-friendly artifacts (e.g., conceptual models, manuals, references, process maps, standard operating procedures, etc.) to support adoption of supply chain security mechanisms.

Alternative concepts and/or approaches may be considered if they can demonstrate a more effective approach. All proposals should demonstrate a clear understanding of the problem set to incentivize private sector compliance with export controls, while demonstrating the ability to implement flexibly and adjust planning and activities as conditions may change, with guidance from EXBS. Note: this effort may engage other recipients/countries in the advanced semiconductor supply chain if requirements at time of execution necessitate.

### **LOE 3: Export Control ICPs, ITT, and Data Analysis in EUR (\$786,800)**

This line of effort covers three related components on internal compliance programs (ICPs) in Türkiye and intangible technology transfer (ITT) and data analysis for customs targeting in Ukraine. Proposals should address each component and stay within budget estimates by component.

#### **3a: Internal Compliance Program (ICP) Course for Turkish Private Sector (\$98,350)**

As a regional trade and manufacturing hub, Türkiye sits on routes that move high-value goods, components, and technical services between Europe, Eurasia, and the Middle East. Such commercial environments are exploited for diversion when private-sector controls are weak. There is currently no legal mandate for exporters to implement ICPs. Diversion and transshipment risk through Türkiye is documented based on trade and corporate records in cases of EU-produced Computer Numerical Control machine tools routed to Russia, illustrating how intermediary-dependent trade can move dual-use items through legitimate channels to unauthorized end-users/uses. To curb procurement networks operating through Türkiye, U.S. authorities have sanctioned Turkey-based entities. Protecting U.S. security and broader international security thus requires (1) increased baseline ICP awareness among Turkish private sector to reduce diversion and retransfer pathways upstream and (2) decreased noncompliance exposure for U.S. firms partnering into unsecured supply chains.

EXBS seeks an implementing partner to:

- Design and deliver a one-day ICP technical consultation for Türkiye's private sector.

- Equip participants with practical, company-level controls to reduce exposure to high-risk counterparties and transactions, strengthen end-use/end-user tracking, and improve the defensibility of trade and partnership decisions from an export control and sanctions compliance lens. The technical consultation should be transaction-oriented and showcase operational decision-making rather than a legal overview or an action plan for ICP implementation.
- Participants should leave with a clear understanding of how an effective ICP works in practice through screening counterparties and intermediaries, documenting decisions, and applying escalation/stop-work procedures. The goal is to reduce diversion and retransfer risk in sensitive trade and in high-risk technology partnerships and agreements.

The challenge for this technical consultation is designing an approach that supports cross-sector learning while preserving industry-specific relevance. A preferred design will include a common core that brings the exporter and financial participants together around a converging or shared process of risk identification, documentation, and escalation, with differentiated elements tailored to their industry functions. A good proposal/technical consultation design will demonstrate how proposed ICP practices can apply to/overlap with domestic compliance expectation while also meeting common due diligence and documentation expectations of international counterparties, especially U.S. companies.

The implementing partner should either identify an appropriate Turkish delivery entity (*e.g.*, a local compliance consultancy, legal partner, or business association) or propose a credible plan to identify and onboard such an entity early in the very early phases of implementation. The model should ensure contextualization for local language, business practice, and regulatory environment while maintaining expertise in export control and sanctions compliance content.

#### Performance Goals

- Practical tools like forms, checklists, and short templates rather than lengthy manuals.
- Best practices by clearly demonstrating practical business and risk-reduction benefits, rather than producing implementation plans or rollout guides for ICPs.
- Common core that brings the exporter and financial participants together around a converging or shared process of risk identification, documentation, and escalation, with differentiated elements tailored to their industry functions.
- Technical consultation design will demonstrate how proposed ICP practices can apply to/overlap with domestic compliance expectation while also meeting common due diligence and documentation expectations of international counterparties, especially U.S. companies.

Performance indicators may include:

- Voluntary ICP adoption and best practices
- Exporter and financial partners establish shared process of risk identification, documentation and escalation.

Targets

- approximately 2 participants each from 25–30 organizations drawn from a mix of exporters/manufacturers in technology and defense-adjacent sectors and financial institutions that provide trade finance and compliance support to these exporters.
- For exporters/manufacturers, the technical consultation should focus on how to apply ICP controls in day-to-day commercial activity. This includes integrating due diligence into sales, procurement, and partner selection; strengthening contracting terms through disclosure clauses and defined subcontracting requirements; applying risk controls to logistics and routing decisions; and adopting baseline technology -protection and information handling practices for partnerships involving advanced -technology production, integration, and repair.
- For financial institutions, the technical consultation should focus on how to apply ICP controls within day-to-day trade finance and client servicing. This includes integrating due diligence into onboarding and periodic review of customers and beneficial ownership; strengthening trade finance controls by checking documentation integrity and standardizing information requests; applying sanctions and export control screening and escalation procedures consistently; and establishing clear rules for when to pause or decline service.

Applicants should propose an innovative and effective set of activities based on the target funding amount, but be prepared to execute flexibly and adjust activity composition and timing based on U.S. government priorities and other factors during the period of performance. Creative approaches are imperative to achieve maximum impact for U.S. national security objectives.

Applicants should demonstrate that each proposed engagement will have a specified objective to support U.S interests, associated indicators, and means for follow-up engagement (e.g., virtual, survey, etc.) to produce meaningful data on realized changes as well as enabling and limiting factors for unrealized changes."

### **3b: Intangible Technology Transfer Prevention Training in Ukraine (\$295,950)**

Since Russia's full-scale invasion in 2022, Ukraine has experienced rapid growth in domestic research, development, and production of defense and dual-use technologies, including

unmanned aerial systems (UAS), electronic warfare, air defense, missile technologies, and other sensitive capabilities. Increased defense spending and urgent battlefield demand have expanded Ukraine's defense industrial base to approximately 900 companies, roughly 90 percent of which operate in the private sector. The battlefield environment continues to accelerate innovation and development of advanced technologies, many of which are viewed as critical assets for Ukraine's post-war economic recovery and export potential.

To support investment and scale production, Ukrainian defense companies are increasingly seeking foreign investment, joint ventures, and international partnerships. These arrangements frequently involve the transfer of technical knowledge and expertise, including intangible technology transfers (ITT). While Ukraine's export control legislation covers technology transfers, the Government of Ukraine (GoU) currently has limited mechanisms to identify and classify sensitive technologies, assess risks associated with cooperative projects, and effectively regulate transfers resulting from foreign investment or collaboration.

Reported cases of unauthorized transfers of Ukrainian-origin technologies highlight gaps in existing oversight mechanisms. These vulnerabilities create risks that sensitive technologies, including those derived from U.S.-controlled technology, could be diverted to end users or countries of concern. Such risks could undermine U.S. technological advantage and expose U.S. partners to compliance violations.

Continued efforts by Russia, the PRC, and other actors to obtain sensitive technologies underscore the need to strengthen Ukraine's institutional capacity to safeguard emerging defense technologies. In addition, Ukrainian industry and research institutions require clearer guidance on compliance obligations and best practices for safeguarding technologies involved in international cooperation.

Program goal:

The program seeks to strengthen Ukraine's institutional and industry-level capacity to prevent unauthorized international technology transfers, including intangible technology transfers, through improved regulatory awareness, industry compliance practices, and operational safeguards.

Program objectives:

The Government of Ukraine develops or updates industry guidelines on safeguarding sensitive technologies and managing ITT risks and makes them broadly available to industry and research institutions.

Ukrainian defense and dual-use companies, research institutions, and universities strengthen their understanding of export control obligations related to technology transfers and implement practical compliance mechanisms in their operational procedures.

Expected Outcomes and Performance Measures

Expected outcomes include:

- Development or update of GoU-endorsed guidelines on safeguarding sensitive technologies and ITTs.
- Increased awareness among Ukrainian research and defense industry stakeholders regarding export control obligations related to technology transfers.
- Adoption of internal compliance practices by participating organizations.

Performance indicators may include:

- Industry guidance documents developed or updated.
- Number of outreach and training activities conducted.
- Number of organizations trained.
- Number of companies that improved ITT compliance practices according to after action survey.
- Targets:
  - Up to 100 defense and dual-use companies, research institutions, and academic entities trained.
  - 2–3 industry outreach or training events conducted.

Government stakeholders may include:

- State Service of Export Control of Ukraine
- Ministry of Economy
- Ministry of Defense
- Security Service of Ukraine
- National Security and Defense Council
- National Academy of Sciences of Ukraine
- Other relevant ministries or agencies

## Program Activities

Activities may include the following components:

1. Development of Industry Guidelines - Provide subject matter expert (SME) advisory support to assist the Government of Ukraine in updating or developing guidelines for safeguarding sensitive technologies and managing ITT risks.
2. Industry Outreach and Training - Conduct 2–3 outreach or training engagements targeting up to 60–100 research institutions and defense industry entities. Training may cover:
  - a. Export control obligations related to technology transfers
  - b. Best practices for safeguarding sensitive technologies
  - c. Internal compliance program elements
  - d. Due diligence for international partnerships and investment
3. Advisory Engagements - Provide targeted consultations with Ukrainian government agencies to support the development and implementation of effective ITT oversight mechanisms (virtual



engagements and in-person technical consultations in Kyiv or regional locations to maximize participation and minimize costs).

Applicants should propose an innovative and effective set of activities based on the target funding amount, but be prepared to execute flexibly and adjust activity composition and timing based on U.S. government priorities and other factors during the period of performance. Creative approaches are imperative to achieve maximum impact for U.S. national security objectives.

Applicants should demonstrate that each proposed engagement will have a specified objective to support U.S. interests, associated indicators, and means for follow-up engagement (e.g., virtual, survey, etc.) to produce meaningful data on realized changes as well as enabling and limiting factors for unrealized changes."

### 3c: Risk Based Targeting in Ukraine (\$394,600)

From 2022-2025, Ukraine received significant in-flow of U.S. advanced arms and military equipment in response to the ongoing Russian military aggression in Ukraine. Ukraine has also experienced an exponential growth of domestic defense production, often involving cooperative partnerships with and investments from the U.S. businesses. Russia, the PRC, and other malign actors continue efforts to divert strategic items and technologies using gaps and insufficiencies in the export control licensing and enforcement systems.

U.S. CBP conducted assessments of the Customs operations, and findings demonstrate a lack of consistent approach and clear organizational capabilities to analyze information, identify and prioritize risks, limited capabilities to respond to/mitigate identified risks, and lack of mechanisms to evaluate the efficiencies of the targeting and risk management (TRM) system. Customs enforcement, to include of export controls, heavily relies on automated targeting system (ASAUR), with such system presently being prevalingly focused on commercial/fiscal risks, thus creating failure prerequisites for security enforcement, and STC enforcement in particular.

Inadequate controls over movement of goods across the borders create a risk of diversion of the U.S. provided advanced defense technologies, threaten U.S. defense technological advancement, and require proactive efforts on part of the Ukrainian Customs in developing its capabilities to identify and mitigate such risks, to detect and deter proliferation of military and other strategic items.

The Program is currently working to strengthen institutional / regulatory framework for effective targeting and risk management operations in Customs, and the effort under this LOE seeks to build upon the initial work and establish a solid knowledge and "how-to" skillset for the TRM officers and equip them with necessary analytical tools to analyze strategic trade and identify high risks.

#### Program Goal:

The Program seeks to strengthen targeting and risk management capabilities as a key element of the strategic trade control/enforcement capabilities of Ukrainian Customs to identify and prevent

diversion of the U.S. advanced defense technologies, prevent high-risk shipments of the WMD and related items, conventional arms, munitions, dual use, sensitive components.

#### Program Objectives:

The Ukrainian Customs administration should be able to conduct systematic security-focused cargo targeting, maintain operational risk profiles, integrate trade and intelligence data into targeting decisions, and increase engagement rates on high-risk cargo while reducing unnecessary inspections in line with EU customs risk management practices.

#### Expected Outcomes include:

- Customs TRM officers at the national and regional levels develop a set of skills to effectively perform complex integrated analysis of data from different sources to identify high-risk shipments of the WMD and related items, conventional arms, munitions, dual use, sensitive components, to include those of U.S. origin;
- Customs TRM officers have access to up to 5 data platforms, in addition to the Customs data sets, to perform comprehensive analysis of data elements related to strategic trade flows.

#### Targets:

- Up to 70 Ukrainian Customs officials trained
- 2-3 advanced trainings on TRM issues conducted
- Government stakeholders may include:
  - State Customs Service of Ukraine
  - Other relevant ministries or agencies

#### Program Activities:

Activities may include the following components:

- Advanced targeting and analytical training – Conduct 2-3 specialized / advanced training for targeting analysts covering criminal intelligence analysis, trade data analytics, anomaly detection, OSINT integration, and development of advanced targeting rules.
- Access granted to Ukrainian Customs to trade intelligence databases, corporate ownership tools, OSINT platforms, and analytical tools supporting data-driven cargo targeting and risk analysis.
- Advisory Engagements – Provide targeted consultations with Ukrainian Customs to support comprehensive cargo targeting and risk analysis, and integration of strategic trade-related risk profiles.
- Virtual engagements and in-person technical consultations in Kyiv or regional locations to maximize participation and minimize costs. Proposals to include logistics support for proposed activities (online platforms, interpretation/translation support / event logistics, SME travel costs, others).

Applicants should propose an innovative and effective set of activities based on the target funding amount, but be prepared to execute flexibly and adjust activity composition and timing based on U.S. government priorities and other factors during the period of performance. Creative approaches are imperative to achieve maximum impact for U.S. national security objectives.

Applicants should demonstrate that each proposed engagement will have a specified objective to support U.S. interests, associated indicators, and means for follow-up engagement (e.g., virtual, survey, etc.) to produce meaningful data on realized changes as well as enabling and limiting factors for unrealized changes."

*ACN/EXBS expects that the Activities and Outcomes of this Award will work towards the following Goals and Objectives:*

<b>ACN/EXBS Goals and Objective(s)</b>	
-	<b>Goal 1: PROTECT at the Source</b> – Maintain U.S. technological and competitive advantage and promote U.S. investments by <b>protecting sensitive goods, technologies, and border infrastructure from masked or predatory acquisition</b> . Projects under this Strategic Objective develop legal/regulatory, industry compliance, and technical frameworks and processes to enable partners to stop proliferation and other malign activity before it starts.
LOE 1a, 1b, 1c, 2	<b>Strategic Objective 1.1 – STC Legal &amp; Regulatory Frameworks:</b> Support partner countries' drafting, adopting, and implementing export control frameworks that are in line with U.S. and international best practices allowing them to prevent exploitation of sensitive commodities by unauthorized end-users.
LOE 1a, 1c, 2, 3	<b>Strategic Objective 1.2 – Investment Screening and Infrastructure Protection:</b> Support partner development and implementation of national security-focused Foreign Direct Investment screening mechanisms and provide equipment and subscriptions to mitigate the risks of predatory foreign investment in or exploitation of advanced technology, border infrastructure, data, and critical mineral sectors.
-	<b>Goal 2: PREVENT Proliferation</b> – Reduce adversary ability to divert sensitive goods and technologies by <b>improving licensing capabilities, strengthening identification and targeting of proliferation networks, and improving enforcement consequences for non-compliance</b> . Projects under this Strategic Objective develop government and industry technical licensing, regulatory, enforcement, and compliance capabilities to identify and act on proliferation/diversion-related activities.

LOE 2	<b>Strategic Objective 2.1 – Licensing and Regulatory Capacity:</b> Enable effective export control and sanctions implementation by developing partner government and industry export licensing, financial regulatory, and catch-all control capabilities.
LOE 2	<b>Strategic Objective 2.2 – Industry Outreach:</b> Work with partner governments to improve their outreach processes and increase industry awareness of laws and regulations, penalties for violation, internal compliance practices, end-user checks, and sanctions risks.
-	<b>Goal 3: DISRUPT Illicit Transfers –</b> Stop proliferation among and by adversaries by <b>improving inspection, detection, and interdiction capacity at ports of entry and along land and maritime borders</b> to identify and stop export control and sanctions violations, arms smuggling, and other illicit proliferation activities. Programs under this Strategic Objective build practical customs and border security skills and capacities, enable international coordination, and enhance U.S. law enforcement collaboration.
LOE 3c	<b>Strategic Objective 3.2 – Cargo Targeting and Risk Management:</b> Develop customs and border targeting and risk analysis capabilities, including the use of automated risk management systems, to identify suspicious trends at high-risk ports of entry including free trade zones.

*The following tables identify the ACN/EXBS Maturity Model capabilities for your proposal. You should select at least one or more below.*

<b>ACN/EXBS Maturity Model</b>	
<i>Strengthen Strategic Trade Management Capacity within EXBS Partner Countries.</i>	
<b>National Capability: Laws and Regulations</b>	
LOE1	<i>Export Control</i>
LOE1	<i>Re-Export Control</i>
LOE1	<i>End-User/Catch-All Control</i>
LOE1	<i>Transshipment Control</i>
LOE1	<i>Transit Control</i>
LOE3	<i>Intangible Technology Transfer Controls (ITT)</i>
LOE1	<i>Free Trade Zones</i>
<b>National Capability: Industry Outreach</b>	
LOE3	<i>Assistance Provided</i>
<b>National Capability: Interagency/International Coordination</b>	
LOE2	<i>High-Level Coordination Mechanisms</i>

<b>ACN/EXBS Objective</b>	
<i>Strengthen Customs Enforcement and Port of Entry Operations capacity within EXBS partner countries.</i>	
<b>National Capability: Targeting</b>	
LOE3	<i>Manual Targeting</i>
LOE3	<i>Automated Targeting</i>

<b>ACN/EXBS Objective</b>	
<i>Strengthen Border Security Operations capacity within EXBS partner countries.</i>	
<b>National Capability: Threat Identification</b>	
LOE2	<i>Incursion Detection</i>

## **2. Substantial Involvement**

ACN/EXBS anticipates awarding a cooperative agreement. The distinction between grants and cooperative agreements revolves around the existence of “substantial involvement.” Cooperative agreements require greater Federal government participation in the project. ACN/EXBS will undertake reasonable and programmatically necessary substantial involvement. Substantial involvement areas can include, but are not limited to:

- Reviewing and approving the engagement outline, draft agenda, and a list of supplemental materials.
- Reviewing and approving draft course content and any proposed revisions.
- Reviewing and approving list of proposed participating.
- Reviewing and approving the scheduling and related logistical arrangements for each engagement; grantee(s) will be responsible for grantee and participant travel, lodging, venue, catering, interpretation & translation, any required A/V support, and other logistical components, unless identified by EXBS as a cost covered or shared by separate EXBS funds, a recipient country, or other organization.
- Reviewing and approving all final training materials prior to submission.

Specific areas of substantial involvement will be dependent upon the objectives of the proposal and outlined in the final Agreement. The final determination on award mechanism will be made by the Grants Officer.

## **D. Application Contents and Format**

Please follow all instructions below carefully. Proposals that do not meet the requirements of this announcement or fail to comply with the stated requirements will be ineligible.

## Content of Application

Please ensure:

- The proposal clearly addresses the goals and objectives of this funding opportunity
- All documents are in English
- All budgets are in U.S. dollars **and must not include cents.**
- All pages are numbered
- All documents are formatted to fit 8 ½ x 11 paper, and
- All Microsoft Word documents are single-spaced, 15-point Open Sans font, with a minimum of 1-inch margins.

The following documents are **required**:

### 1. *Mandatory application forms*

- SF-424 (Application for Federal Assistance)
- SF-424A (Budget Information for Non-Construction programs) at \$2,441,589.
- Detailed Budget (Excel) found at MyGrants under Information for the Applicant
- All SF forms can be found at: [SF-424 Family](#)

### 2. *Summary Page (optional)*

Cover sheet stating the applicant's name and organization, proposal date, program title, program period proposed start and end date, and brief purpose of the program.

### 3. *Proposal (15 pages maximum)*

The proposal should contain sufficient information that anyone not familiar with it would understand exactly what the applicant wants to do. You may use your own proposal format, but it must include all the items below.

- **Proposal Summary:** Short narrative that outlines the proposed project, including project objectives and anticipated impact.
- **Introduction to the Organization or Individual applying:** A description of past and present operations, showing ability to carry out the program, including information on all previous grants from the State Department and/or U.S. government agencies.
- **Problem Statement:** Clear, concise and well-supported statement of the problem to be addressed and why the proposed program is needed
- **Project Goals and Objectives:** The "goals" describe what the program is intended to achieve. The "objectives" refer to the intermediate accomplishments on the way to the goals. These should be achievable and measurable.
- **Project Activities:** Describe the program activities and how they will help achieve the objectives.
- **Project Methods and Design:** A description of how the program is expected to work to solve the stated problem and achieve the goal. Include a logic model as appropriate.

- **Proposed Project Schedule and Timeline:** The proposed timeline for the program activities. Include the dates, times, and locations of planned activities and events.
- **Key Personnel:** Names, titles, roles and experience/qualifications of key personnel involved in the program. What proportion of their time will be used in support of this program?
- **Project Partners:** List the names and type of involvement of key partner organizations and sub-awardees.
- **Project Monitoring and Evaluation Plan:** Throughout the time-frame of the cooperative agreement, describe how the activities and associated indicators of progress toward project goals/objectives will be monitored and evaluated to ensure timeliness, efficacy, and efficiency.
- **Future Funding or Sustainability** Applicant's plan for continuing the program beyond the cooperative agreement period, or the availability of other resources, if applicable.

#### ***4. Risk Assessment***

Proposals must include a risk assessment and a plan for monitoring and mitigating the risks identified. Risks to project implementation may include a variety of political, environmental, and other factors. A few examples include outbreak of violent conflict, elections that change government partners, cybersecurity / hacking, misuse of personally identifiable information (PII), and diversion of financial or non-financial support to prohibited parties (terrorist financing). The assessment should also identify risks to staff, implementers, participants, beneficiaries, or their communities. Besides political and environmental factors, risks may include online or in-person potential physical, social, psychological, economic, and/or reputational backlash to beneficiaries as a result of their participation. The proposal should include a participatory needs assessment and explain how its implementers will engage with local actors throughout its lifecycle. Strong proposals will also describe strategies to sustain the activities beyond ACN/EXBS funding, or alternatively, how applicants will co-design a responsible exit strategy with local partners and in consultation with beneficiaries.

#### ***5. Scope of Work (SOW)***

Separate from the proposal but part of the application, not to exceed two-pages Word document (includes all proposed program components and links each of these to the specific goal(s) it addresses. This document is not a narrative. It must be in outline form and capture all proposed work to be funded by this project. This includes each proposed program component with a brief statement that links each component to the corresponding goal it supports. SOWs that contain quantitative estimates of expected outputs, outcomes and indicators of success for each component will be considered more competitive.

#### ***6. Budget Justification Narrative***

After filling out the SF-424A Budget (above), use a separate file to describe each of the budget expenses in detail. See section I. Other Information: Guidelines for Budget Justification below for further information.

## **7. Attachments**

Attachments must adhere to the following guidelines and attachment order. File names must only include the document type, NOFO number, and line of effort number (if applicable), and not exceed 49 characters (including spaces). Example – Table of Contents\_#####\_LOE1. The attachment order follows:

- Attachment A – Table of Contents
- Attachment B – Required SF Forms
- Attachment C – Proposal Narrative
- Attachment D – Risk Assessment
- Attachment E – Scope of Work
- Attachment F – Detailed Budget (Excel)
- Attachment G – Budget Narrative (Word)
- Attachment H – NICRA (if applicable)
- Attachment I – A-133 audit (if applicable)
- Other Supporting Documents

## **E. Submission Requirements and Deadlines**

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

Applicants can find application forms, kits, or other materials needed to apply on [grants.gov](https://grants.gov) and [MyGrants](https://mygrants.gov) under the announcement title “EXBS Legal & Regulatory Support,” funding opportunity number “DFOP0018151.” Please contact [EXBS\\_Grants@state.gov](mailto:EXBS_Grants@state.gov) if requesting reasonable accommodations for persons with disabilities or for security reasons. Please note that reasonable accommodations do not include deadline extensions.

### **2. Department of State Contacts**

If you have any questions about the application process, please contact:

[EXBS\\_Grants@state.gov](mailto:EXBS_Grants@state.gov). Questions are due on Thursday, June 04, 2026 and answers will be posted in MyGrants no later than Thursday, June 04, 2026 to answer questions from all potential applicants.

### **3. Unique entity identifier and System for Award Management (SAM.gov)**

#### **Required Registrations**

All organizations, whether based in the United States or in another country, must have a Unique Entity Identifier (UEI) and an active registration in SAM.gov. A UEI is one of the data elements mandated by Public Law 109-282, the Federal Funding Accountability and Transparency Act (FFATA), for all Federal awards. An applicant must maintain an active registration while it has a proposal under review by the Department and must continue to keep the registration active for



the entire duration of the period of performance of any Federal award that results from this NOFO.

The 2 CFR 200 requires subrecipients to obtain a UEI. Please note the UEI for subrecipients is not required at the time of application but will be required before an award is processed and/or directed to a subrecipient.

***Note: The process of obtaining or renewing a SAM.gov registration may take anywhere from 4-8 weeks. Please begin your registration as early as possible.***

- Organizations **based in the United States** or that pay employees within the United States will need an Employer Identification Number (EIN) from the Internal Revenue Service (IRS) and a UEI prior to registering in SAM.gov.
- Organizations **based outside of the United States** and that do not pay employees within the United States do not need an EIN from the IRS but do need a UEI prior to registering in SAM.gov.
- **Organizations based outside of the United States that do not intend to apply for U.S. Department of Defense (DoD) awards are no longer required to have a NATO Commercial and Government Entity (NCAGE) code to apply for non-DoD foreign assistance funding opportunities.** If an applicant organization is mid-registration and wishes to remove an NCAGE code from their SAM.gov registration, the applicant should submit a help desk ticket (“incident”) with the Federal Service Desk (FSD) online at [www.fsd.gov](http://www.fsd.gov) using the following language: “I do not intend to seek financial assistance from the Department of Defense. I do not wish to obtain an NCAGE code. I understand that I will need to submit my registration after this incident is resolved in order to have my registration activated.”

Organizations based outside of the United States and that DO NOT plan to do business with the DoD should follow the below instructions:

Step 1: Proceed to SAM.gov to obtain a UEI and complete the SAM.gov registration process. SAM.gov registration must be renewed annually.

Organizations based outside of the United States and that DO plan to do business with the DoD in addition to Department of State should follow the below instructions:

Step 1: Apply for an NCAGE code by following the instructions on the NSPA NATO website linked below:

NCAGE Homepage:

<https://eportal.nspa.nato.int/AC135Public/sc/CageList.aspx>

NCAGE Code Request Tool (NCRT):

[NCAGE Code Request Tool \(nato.int\)](https://eportal.nspa.nato.int/AC135Public/sc/CageList.aspx)

## **Exemptions**

An exemption from the UEI and sam.gov registration requirements may be permitted on a case-by-case basis. See [2 CFR 25.110](#) for a full list of exemptions.

Organizations requesting exemption from UEI or SAM.gov requirements must email the point of contact listed in the NOFO at least two weeks prior to the deadline in the NOFO providing a justification of their request. Approval for a SAM.gov exemption must come from the warranted Grants Officer before the application can be deemed eligible for review.

## **4. Audits**

Include a copy of your organization's most recent audit (single or program audit if applicable), an annual external audit or audited financial statements when an audit has not been conducted. Please refer to the 2 CFR 200 for requirements. The applicant's proposal may include the cost of an audit that:

- Complies with the requirements of 2 CFR 200 Subpart F "Audit Requirements"
- Complies with the requirements of American Institute of Certified Public Accountants (AICPA) Statement of Position (SOP) No. 92-9, "Audits of Not-for-Profit Organizations Receiving Federal Awards."
- Complies with AICPA Codification of Statements on Auditing Standards AU Section 551, "Reporting on Information Accompanying the Basic Financial Statements in Auditor-Submitted Documents," where applicable. A non-federal entity that expends \$1,000,000 or more in all USG federal assistance awards during the non-federal entity's fiscal year is required to conduct a single or program-specific audit for that year in accordance with the provisions of 2 CFR 200 subpart F. For more information, see Audit Services, 2 CFR 200.425.

## **5. Submission Dates and Times**

Applications are due no later than Monday, July 20, 2026, 23:59:59 EST.

## **6. Funding Restrictions**

- i. Funding Restrictions for the United Nations Relief and Works Agency (UNRWA)

None of the funds awarded resulting from this Notice of Funding Opportunity may be made available for subawards, direct financial support, or otherwise used to provide any payment or transfer to United Nations Relief and Works Agency (UNRWA).

- ii. Prohibition on Funding Activities that Encourage Mass-Migration Caravans towards the United States Southwest Border.

None of the funds awarded under this cooperative agreement may be made available to encourage, mobilize, publicize, or manage mass-migration caravans towards the United States southwest border. Funds may not be made available for legal counseling on the

United States asylum process; and/or for referrals to legal representation in the United States.

Funds may only be used for cash cards for use in the country in which they are provided or to facilitate assisted voluntary returns and other purposes that do not encourage, mobilize, publicize, or manage mass migration caravans towards the United States southwest border. The provision of humanitarian assistance is permitted.

iii. Certification Regarding Compliance with applicable Federal anti-discrimination laws

If the place of performance or delivery of any award made under this NOFO will be within the United States, applicants are advised that they will be required to certify the following at the time of award:

- 1) Its compliance in all respects with all applicable Federal anti-discrimination laws is material to the government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code and;
- 2) It does not operate any programs promoting Diversity, Equity, and Inclusion that violate any applicable Federal anti-discrimination laws. A program promoting Diversity, Equity, and Inclusion means a program whose purpose is to promote preferences based on race, color religion, sex, or national origins, such as in training or hiring.

iv. Certification Regarding Compliance with 20 U.S.C. 1011f and any other applicable foreign funding disclosure requirements.

Applicants are advised that IHEs must certify the following at the time of award, and that this certification requirement must be included in any subaward agreements to IHEs:

- 1) Its compliance in all respects with section 1011f of title 20, United States Code, and any other applicable foreign funding disclosure requirements is material for purposes of section 3729 of title 31, United States Code, and for receipt of appropriate Federal grant funds.

v. Certification of Trafficking in Persons Compliance and Compliance Plan

Applicants are advised that they will be required to certify the following at the time of award for awards where the estimated value of services to be performed outside the United States exceeds \$500,000:

- 1) To the best of the Recipient's knowledge, neither the Recipient, nor any subrecipient, contractor, or subcontractor of the Recipient or any agent of the recipient or of such a subrecipient, contractor, or subcontractor, is engaged in any of the activities described in 2 CFR 175.105(a);

The recipient has implemented a Trafficking in Persons compliance plan to prevent activities described in 2 CFR 175(a) and is compliant with this plan; and the compliance plan must follow the minimum requirements described in 2 CFR 175(b)(5).

- 2) That the Recipient has and will implement procedures to prevent activities described in 2 CFR 175.105(a) and to monitor, detect, and terminate any subrecipient, contractor, subcontractor, or employee of the recipient engaging in these activities.

Recipients do not need to submit a copy of the plan. However, they must provide it to the Grants Officer upon request, and as appropriate, must post the useful and relevant contents of the plan or related materials on their website and at the workplace. Recipients must re-certify on an annual basis for the entire award period of performance.

vi. Prohibition on Unmanned Aircraft Systems Manufactured or Assembled by American Security Drone Act-Covered Foreign Entities

(a) *Definitions.*

*American Security Drone Act-covered foreign entity* means an entity included on a list developed and maintained by the Federal Acquisition Security Council (FASC) and published in the System for Award Management (SAM) at <https://www.sam.gov>

*FASC-prohibited unmanned aircraft system* means an unmanned aircraft system manufactured or assembled by an American Security Drone Act-covered foreign entity.

*Unmanned aircraft* means an aircraft that is operated without the possibility of direct human intervention from within or on the aircraft.

*Unmanned aircraft system* means an unmanned aircraft and associated elements (including communication links and the components that control the unmanned aircraft) that are required for the operator to operate safely and efficiently in the national airspace system.

(b) *Prohibition.*

Recipients of funding under this Notice of Funding Opportunity (including subawards and subcontracts issued by the recipient) will be prohibited from:

- (1) Delivering any FASC-prohibited unmanned aircraft system, which includes unmanned aircraft (i.e., drones) and associated elements;
- (2) Operating a FASC-prohibited unmanned aircraft system in the performance of the award; and
- (3) Using Federal funds for the purchase or operation of a FASC-prohibited unmanned aircraft system.

c) *Exemptions, exceptions, and waivers.* The prohibitions described above will not apply if the agency determines that an exemption, exception, or waiver applies and the award indicates that such a determination has been made. [See sections 1823 through 1825 and 1832 of Public Law 118-31 ( [41 U.S.C. 3901](#) note prec.) for statutory requirements pertaining to exemptions, exceptions, and waivers.].

vii. Promoting Human Flourishing in Foreign Assistance (PHFFA)

Applicants for foreign assistance awards should be aware of requirements in 2 CFR Part 602, 603, and 604.

These policies are referred to collectively as the Promoting Human Flourishing in Foreign Assistance (PHFFA) Policy.

602: The award term imposes certain abortion-related requirements on foreign nongovernmental organizations (NGOs), United States NGOs, public international organizations, foreign governments, and parastatals.

603: The award term imposes certain requirements relating to gender ideology on foreign nongovernmental organizations (NGOs), United States NGOs, international organizations, foreign governments, and parastatals.

604: The award term imposes certain requirements relating to discriminatory equity ideology on foreign nongovernmental organizations (NGOs), United States NGOs, international organizations, foreign governments, and parastatals.

The Department recognizes there are costs associated with these policies. Potential one-time and recurring costs the Department identifies for recipients and grantees are for familiarization with the policy, development and delivery of organizational training and implementation guidance, routine compliance monitoring, and recordkeeping and reporting requirements.

## 7. Other Submission Requirements

Applications must be submitted electronically through [MyGrants](#)

### F. Application Review Information

#### 1. Review Criteria

Each application will be evaluated and rated based on the evaluation criteria outlined below.

	LOE 1	LOE 2	LOE 3 (a-c)
Quality and Achievability	30	40	40
Experience & Qualifications	20	25	25
Cost & Budget	10	15	15
MEL Plan	10	10	10
Long-term Impact	10	10	10

**Quality and Achievability of the Program Idea:** The applicant demonstrates understanding of the LOE's objectives and clearly explains proposed activities to effectively and efficiently achieve them, with a reasonable and realistic implementation timeline. The proposal does not include any activities contrary to any standing Executive Orders. For a full list, see <https://www.federalregister.gov/>.

**Experience and Qualifications:** The applicant (including any sub-contracted entities) demonstrates the requisite expertise, experience, and capacity to complete the proposed activities, especially as substantiated by past performance in similar types of work. The organization has the internal controls in place to manage federal funds.

**Cost and Budget:** Overall cost and specific budget categories are reasonable in relation to the proposed activities and outcomes, and the applicant demonstrates the capability to responsibly manage federal funds, including through internal controls and past performance. If sub-awards are proposed, applicant demonstrates experience managing subawards.

**Monitoring and evaluation plan:** Applicant demonstrates ability to measure program success against key indicators and provides milestones to indicate progress toward goals outlined in the proposal. The program includes output and outcome indicators and shows how and when those will be measured.

**Long-term impact:** The proposed approach demonstrates how the activities will contribute to objective fulfillment beyond the funded period of performance, including persistence of gains, self-sustained actions by assistance recipients, and/or other realistic mechanisms.

## **2. *Indirect Costs***

If two or more applications receive equivalent scores based on the evaluation criteria outlined in this NOFO, preference will be given to the applicant with the lower indirect cost rate, as consistent with Executive Order 14332, Section 4(b)(iii). This preference will only be applied as a tie-breaking mechanism and does not supersede the primary evaluation criteria.

## **3. *Review and Selection Process***

A review committee will evaluate all eligible applications.

## **4. *Risk Review***

### **i. Risk factors**

Under the merit review as required by 2 CFR 200.206, prior to making a Federal Award the Department will review and consider the following risk factors:

- a. Financial stability
- b. Management systems and standards
- c. History of performance
- d. Audit reports and findings
- e. Ability to effectively implement requirements

### **ii. Responsibility/Qualification Information in SAM.gov**

The Federal awarding agency, prior to making a Federal award with a total amount of Federal share greater than the simplified acquisition threshold, is required to review and consider any information about the applicant that is in the U.S. government designated integrity and performance system accessible through SAM.gov (see 41 U.S.C. 2313)

An applicant can review and comment on any information in the responsibility/qualification records available in SAM.gov.

Before making decisions in the risk review required by 2 CFR 200.206, the Department will consider any comments by the applicant, along with information available in the responsibility/qualification records in SAM.gov.

## **G. Award Notices**

The cooperative agreement will be written, signed, awarded, and administered by the Grants Officer. The award agreement is the authorizing document, and it will be provided to the recipient for review and counter-signature. The recipient may only start incurring project expenses beginning after the official kick-off of the grant/cooperative agreement. The kick-off

will be scheduled in coordination with the assigned Grants Officer Representative, and attended by the Grants team with the optional attendance of the Grants Officer.

If a proposal is selected for funding, the Department of State has no obligation to provide any additional future funding. Renewal of an award to increase funding or extend the period of performance is at the discretion of the Department of State.

Issuance of this NOFO does not constitute an award commitment on the part of the U.S. government, nor does it commit the U.S. government to pay for costs incurred in the preparation and submission of proposals. Further, the U.S. government reserves the right to reject any or all proposals received.

**Unsuccessful applicants:** Unsuccessful applicants will be notified by October 2026 via email.

**Payment Method:**

Payments under this award will be made through the U.S. Department of Health and Human Services (HHS) Payment Management System (PMS). Unless otherwise stipulated, the Recipient must request payments on a reimbursement basis. Instructions for requesting payments via PMS are available at: <https://pms.psc.gov/>.

Recipients may not draw down funds without the affirmative authorization of the Department of State. In addition, recipients must submit, with each PMS payment request, a detailed explanation justifying the request.

## **H. Post-Award Requirements and Administration**

### ***1. Administrative and National Policy Requirements***

Before submitting an application, applicants should review all the terms and conditions and required certifications which will apply to this award, to ensure that they will be able to comply. These include:

In accordance with the Office of Management and Budget's guidance located at 2 CFR part 200, all applicable Federal laws, and relevant Executive guidance, the Department of State will review and consider applications for funding, as applicable to specific programs, pursuant to this notice of funding opportunity in accordance with the following:

- [Guidance for Grants and Agreements in Title 2 of the Code of Federal Regulations](#) (2 CFR), as updated in the Federal Register's 89 FR 30046 on April 22, 2024, particularly on:
  - Selecting recipients most likely to be successful in delivering results based on the program objectives through an impartial process of evaluating Federal award applications (2 CFR part 200.205),
  - Promoting the freedom of speech and religious liberty in alignment with *Promoting Free Speech and Religious Liberty* (E.O. 13798) and *Improving Free*



*Inquiry, Transparency, and Accountability at Colleges and Universities* (E.O. 13864) (§§ 200.300, 200.303, 200.339, and 200.341),

- Providing a preference, to the extent permitted by law, to maximize use of goods, products, and materials produced in the United States (2 CFR part 200.322), and
- Terminating agreements pursuant to the U.S. Department of State Standard Terms and Conditions, including, to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities (2 CFR part 200.340). For the avoidance of doubt, the Department has sole discretion over the determination that an award no longer effectuates program goals or agency priorities, and this provision permits awards to be terminated at the Department's convenience, including when it determines that the award no longer advances the national interest.

- [2 CFR 25 - UNIVERSAL IDENTIFIER AND SYSTEM FOR AWARD MANAGEMENT](#)
- [2 CFR 170 - REPORTING SUBAWARD AND EXECUTIVE COMPENSATION INFORMATION](#)
- [2 CFR 175 - AWARD TERM FOR TRAFFICKING IN PERSONS](#)
- [2 CFR 182 - GOVERNMENTWIDE REQUIREMENTS FOR DRUG-FREE WORKPLACE \(FINANCIAL ASSISTANCE\)](#)
- [2 CFR 183 - NEVER CONTRACT WITH THE ENEMY](#)
- [2 CFR 600 – DEPARTMENT OF STATE REQUIREMENTS](#)
- [U.S. DEPARTMENT OF STATE STANDARD TERMS AND CONDITIONS](#)
- Recipients must comply with all applicable Executive Orders A searchable list can be found in the Federal Register: <https://www.federalregister.gov/>

## 2. **Reporting**

**Reporting Requirements:** Recipients will be required to submit financial reports and program reports. The award document will specify what reports are required and how often these reports must be submitted. If applicable, the recipient shall track all funding by country using a template provided by ACN/EXBS. All reports must be uploaded to the appropriate post award activity in MyGrants.

**Foreign Assistance Data Review:** As required by Congress, the Department of State must make progress in its efforts to improve tracking and reporting of foreign assistance data through the Foreign Assistance Data Review (FADR). The FADR requires tracking of foreign assistance activity data from budgeting, planning, and allocation through obligation and disbursement. Successful applicants will be required to report and draw down federal

funding based on the appropriate FADR Data Elements, indicated within their award documentation. In cases of more than one FADR Data Element, typically program or sector and/or regions or country, the successful applicant will be required to maintain separate accounting records.

Applicants should be aware of the post award reporting requirements reflected in [2 CFR 200 Appendix XII—Award Term and Condition for Recipient Integrity and Performance Matters](#).

#### Reporting Calendar by Fiscal Year

Q1 (October -December) due January 30;  
Q2 (January-March) due April 30;  
Q3 (April-June) due July 30; and  
Q4 (July-September) due October 30

### **1. Branding and Marking**

The Department of State, its programs, and U.S. Government funding and assistance should be easily identifiable to the Department's global audiences.

Recipients of federal assistance awards must follow the branding guidance published at [Guidance for Contracts and Grants - U.S. Department of State Brand System](#). Branding policy exceptions are outlined in the U.S. Department of State Foreign Affairs Manual [10 FAM 416, Policy Exceptions](#).

For more information, visit: <https://brand.america.gov/>

## **I. Other Information**

### **Guidelines for Budget Justification**

The total budget should not exceed \$2,441,589.

**Personnel and Fringe Benefits:** Describe the wages, salaries, and benefits of temporary or permanent staff who will be working directly for the applicant on the program, and the percentage of their time that will be spent on the program.

**Travel:** Estimate the costs of travel and per diem for this program, for program staff, consultants or speakers, and participants/beneficiaries. If the program involves international travel, include a brief statement of justification for that travel.

**Equipment:** Describe any machinery, furniture, or other personal property that is required for the program, which has a useful life of more than one year (or a life longer than the duration of the program), and costs at least \$10,000 per unit.

**Supplies:** List and describe all the items and materials, including any computer devices, that are needed for the program. If an item costs more than \$10,000 per unit, then put it in the budget under Equipment.

**Contractual:** Describe goods and services that the applicant plans to acquire through a contract with a vendor. Also describe any sub-awards to non-profit partners that will help carry out the program activities.

**Other Direct Costs:** Describe other costs directly associated with the program, which do not fit in the other categories. For example, shipping costs for materials and equipment or applicable taxes. All “Other” or “Miscellaneous” expenses must be itemized and explained.

**Indirect Costs:** These are costs that cannot be linked directly to the program activities, such as overhead costs needed to help keep the organization operating. If your organization has a Negotiated Indirect Cost Rate (NICRA) and includes NICRA charges in the budget, attach a copy of your latest NICRA. Organizations that have never had a NICRA may request indirect costs of 15% of Modified Total Direct Costs as defined in 2 CFR 200.1.

“Cost Sharing” refers to contributions from the organization or other entities other than the U.S. Embassy. It also includes in-kind contributions such as volunteers’ time and donated venues.

**Alcoholic Beverages:** Please note that award funds cannot be used for alcoholic beverages.