

Notice of Funding Opportunity

Application due: July 24, 2026



Fiscal Year 2026 Tribal Homeland Security Grant Program

Assistance Listing Number: 97.150

Funding Opportunity Number: DHS-26-GPD-150-00-99

Contents

	<u>Before you begin</u>	<u>2</u>
	<u>Step 1: Review the Opportunity</u>	<u>3</u>
	Basic information	4
	Eligibility	4
	Program Description	8
	<u>Step 2: Get Ready to Apply</u>	<u>20</u>
	Submission Requirements and Application Deadlines	21
	<u>Step 3: Write Your Application</u>	<u>24</u>
	Application Contents and Format	25
	<u>Step 4: Learn About the Award Review Process</u>	<u>27</u>
	Application Review Information	28
	Intergovernmental Review	31
	<u>Step 5: Learn What Happens After Award</u>	<u>32</u>
	Award Notices	33
	Post-Award Requirements and Administration	33
	Other Information	43
	<u>Contacts and Appendices</u>	<u>50</u>
	Contacts	51
	Appendices	53



Before you begin

If you believe you are a good candidate for this funding opportunity, secure your System for Award Management ([SAM.gov](https://sam.gov)) and [Grants.gov](https://grants.gov) registrations now. If you are already registered, make sure your registration is active and up-to-date.

SAM.gov registration (this can take several weeks)

You must have an active account with SAM.gov. This includes having a Unique Entity Identifier (UEI).

[See Step 2: Get Ready to Apply](#)

Grants.gov registration (this can take several days)

You must have an active Grants.gov registration. Doing so requires a [Login.gov](https://login.gov) registration as well.

[See Step 2: Get Ready to Apply](#)

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 (800) 323-8603 and TTY (844) 889-4357



To help you find what you need, this NOFO uses internal links. In Adobe Reader, you can go back to where you were before clicking an internal link by pressing Alt + Left Arrow (Windows) or Command + Left Arrow (Mac) on your keyboard.



Step 1: Review the Opportunity

In this step

Basic information	<u>4</u>
Eligibility	<u>4</u>
Program description	<u>8</u>

Basic Information

A. Award Facts

Agency Name: U.S. Department of Homeland Security (DHS),
Federal Emergency Management Agency (FEMA)

Assistance Listing Number: 97.150

Notice of Funding Opportunity (NOFO) Title: Fiscal Year (FY) 2026 Tribal
Homeland Security Grant Program (THSGP)

Funding Opportunity Number: DHS-26-GPD-150-00-99

Announcement Type: Initial

Expected Award Range: \$40,000 to \$2 million

Expected Total Funding: \$14.25 million

Anticipated Number of Awards: 20

B. Executive Summary

The FY 2026 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.

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.



Have questions?
See [Contacts and Support](#).

Key Dates

Projected Application Start
Date: June 24, 2026

Projected Application End
Date: July 24, 2026

Anticipated Funding Selection
Date: September 01, 2026

Anticipated Award Date:
September 30, 2026

Projected Period of
Performance Start Date:
September 01, 2026

Projected Period of
Performance End Date:
August 31, 2029

Budget Period:
September 1, 2026 to August
31, 2029

Eligibility

A. Eligible Entities

Only the following entities or entity types are eligible to apply.

Applicant Eligibility

Directly eligible tribes as defined below.

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)). 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). Per 6 U.S.C. § 601(4), a “directly eligible tribe” is any federally recognized Indian tribe that meets the following criteria:

“(A) any Indian tribe—

- (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)
 - (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
 - (iv) that certifies to the Secretary that a State has not provided funds under section 604 or 605 of this title to the Indian tribe or consortium of Indian tribes for the purpose for which direct funding is sought; and
- (B) a consortium of Indian tribes if each tribe satisfies the requirements of subparagraph (A).”

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).

In FY 2026, 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 the program office by e-mail at fema-thsgp@fema.dhs.gov or by phone at (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET.

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”.

Subapplicant Eligibility

Not Allowed

B. Project Type Eligibility

Allowable Project Types

Allowable costs generally must fall into the categories of planning, organization, equipment, training, or exercises. Please see [Appendix I: Allowable Costs](#) for more information.

If there are any questions regarding allowable costs, please contact the appropriate FEMA Headquarters (HQ) Preparedness Officer.

Unallowable Project Types

See Section E “[Program-Specific Unallowable Costs](#)” for more information on unallowable project types.

C. Requirements for Personnel, Partners, and Other Parties

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 **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.

Further, the Authorized Organization Representative (AOR) must be a duly authorized current employee, personnel, official, staff, or leadership of the recipient. ***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.

D. Maximum Number of Applications

The maximum number of applications that can be submitted is:

1. One application per directly eligible tribe, with each application containing up to three IJs.

E. Additional Restrictions

Recipients/subrecipients, and if applicable, applicants/subapplicants, are required to certify their compliance with federal statutes, DHS directives, policies, and procedures.

1. 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>.

Please see the [Preparedness Grants Manual](#) for more information on NIMS.

2. 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](#).

Please see the [Preparedness Grants Manual](#) for more information on the THIRA/SPR requirements.

F. References to Other Eligibility Factors

Please see the following references provided below:

1. “Threshold Review Criteria” subsection
2. “Financial Integrity Criteria” subsection
3. “Supplemental Financial Integrity Criteria and Review” subsection
4. FEMA may request financial information such as the Employer Identification Number (EIN) and bank information as part of the potential award selection. This will apply to everyone who benefits from the award, including subrecipients.

G. Cost Share Requirements

There is no cost share requirement. Applicants that propose a cost share will not receive additional consideration in the scoring.

H. Cost Share Description, Type, and Restrictions

Not applicable.

I. Cost Share Example

Not applicable.

J. Required Information for Verifying Cost Share

Not applicable.

[Maintenance of Effort](#)

Not applicable.

Program Description

A. Program Purpose

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 2026, DHS has identified five priority areas (see section below) 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.

Since its inception, THSGP has enabled Tribal Nations to enhance planning, training, equipment, and operational coordination that directly supports prevention, protection, mitigation, and response capabilities. These investments have helped Tribal Nations begin to close critical capability gaps and improve readiness for terrorist threats. However, evolving risks, limited local resources, and enduring infrastructure and capability needs mean that substantial gaps remain. Continued THSGP funding is therefore essential to sustain and expand these improvements while advancing a national culture of preparedness in tribal communities.

For FY 2025, 36 applications were received from eligible Tribal Nations, and 18 were approved for funding based on a competitive review process.

B. Goals and Objectives

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 2026, five areas attract the most concern and thus are national priority areas (NPAs):

1. Enhancing the protection of soft targets and crowded places;
2. Supporting Homeland Security Task Forces and fusion centers;
3. Enhancing and integrating cybersecurity resiliency;
4. Enhancing election security; and
5. Supporting Border Crisis Response and Enforcement.

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

1. 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.

2. 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; and,
- Protecting 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, on interdiction/disruption of criminal or smuggling networks; and,
- 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](#).

3. 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.

4. 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 (VMSG) 2.0 established by the U.S. Election Assistance Commission;
- Complete testing through a Voting System Test Laboratory (VSTL) accredited by the Commission³;
- 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 may be withheld from drawdown until compliance is confirmed.

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

5. **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.

³ [Federal Register: Preserving and Protecting the Integrity of American Elections](#)

b. Other FY 2026 Funding Priorities

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;⁴
- Training and awareness campaigns;
- Equipment and capital projects; and,
- Exercises.

The table below breaks down these priority areas for the FY 2026 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 2026 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	• 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	• Cybersecurity risk assessments • Projects that address vulnerabilities identified in cybersecurity risk assessments ○ 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 2.0) ○ Adoption of cybersecurity performance goals (CISA's Cross-Sector Cybersecurity Performance Goals) • Cybersecurity training and planning

⁴ 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
	activities • Long-term vulnerability reduction • Situational assessment • Infrastructure systems • Operational communications	
Enhancing the Protection of Soft Targets/Crowded Places	• Operational coordination • Public information and warning • Intelligence and information sharing • Interdiction and disruption • Screening, search, and detection • Access control and identity verification • Physical protective measures • Risk management for protection programs and activities	• Physical security enhancements ○ Security cameras (closed-circuit television [CCTV]) ○ Security screening equipment for people and baggage ○ Lighting ○ Access controls • Fencing, gates, barriers, etc.
Supporting Homeland Security Task Forces and Fusion Centers	• Intelligence and information sharing • Interdiction and disruption • Planning • Public information and warning • Operational coordination • Risk management for protection programs and activities	• 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 • Identifying, assessing and reporting threats of violence • Joint intelligence analysis training and planning with DHS officials and other entities designated by DHS
Enhancing Election Security	• Cybersecurity • Intelligence and information sharing • Planning • Long-term vulnerability reduction • Situational assessment • Infrastructure systems • Operational coordination	• 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

Priority Areas	Core Capabilities	Examples of Allowable Activities
	Community resilience	- 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 - Prioritizing compliance with the VWSG 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	- Training and awareness - Community resilience - Operational coordination - Risk management for protection programs and activities	- 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 - Developing or enhancing information-sharing platforms between ICE and tribal law enforcement - Procuring screening, detection, and communications technology to support immigration enforcement activities - Establishing secure and dedicated communication networks with ICE Field Offices - 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	- Planning - Risk management for protection programs & activities	- Developing: - Security Risk Management Plans - Continuity of Operations Plans - Response Plans

Priority Areas	Core Capabilities	Examples of Allowable Activities
	• Risk & disaster resilience assessment • Threats and hazards identification • Operational coordination • Community resilience	• 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 • Revising existing plans to strengthen community resilience in vulnerable communities
Training & Awareness	• Long-term vulnerability reduction • Public information & warning • Operational coordination • Situational assessment • Community resilience	• 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	• Long-term vulnerability reduction • Infrastructure systems • Operational communications • Interdiction & disruption • Screening, search & detection • Access control & identity verification • Physical protective measures	• Protecting 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	• Long-term vulnerability reduction • Operational coordination • Operational communications • Community resilience	• Response exercises, including exercise planning with community-based organizations

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](https://www.fema.gov/national-preparedness-system).

C. Performance Measures and Targets

Performance metrics for this program are:

- 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 (60%); and,
- Percentage of projects that address one or more of the NPA (15%).

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.

D. Federal Assistance Type

Competitive Grant.

E. Program-Specific Unallowable Costs

The unallowable costs described below are applicable to all THSGP-funded projects.

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.

Additionally, investments that do not have a clear nexus to preventing, preparing for, protecting against, and responding to acts of terrorism are not allowable. This includes general public safety vehicles and equipment.

Note: The above may not be exhaustive. Please consult the applicable terms and conditions and with FEMA for more information.

F. General Funding Requirements

Costs charged to federal awards (including federal and non-federal cost share funds) must comply with applicable statutes, rules and regulations, policies, this NOFO, and the terms and conditions of the federal award. This includes, among other requirements, that costs must be incurred, and products and services must be delivered within the budget period (see [2 C.F.R. § 200.403\(h\)](https://www.federalregister.gov/doc/2019/04/24/2019-08403)).

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

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

G. Prohibition on Covered Equipment or Services

FEMA provides additional resources regarding the prohibition on covered telecommunications equipment and services in its policy titled [Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services](#) (FEMA Policy #405-143-1). This policy outlines specific requirements related to the prohibition. Additionally, FEMA's [Contract Provisions Guide](#) offers sample language for the required contract provisions.

Recipients, subrecipients, and their contractors or subcontractors must comply with the prohibitions set forth in [Section 889 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019](#), which restrict the purchase of covered telecommunications and surveillance equipment and services. See [2 C.F.R. §§ 200.216](#), [200.327](#), [200.471](#), and [Appendix II to 2 C.F.R. Part 200](#) for more information.

Prohibition on Covered Foreign Unmanned Aircraft Systems (UAS)

Recipients, subrecipients, and their contractors or subcontractors must also comply with Section 1825 of the American Security Drone Act of 2023, enacted as part of the [National Defense Authorization Act for Fiscal Year 2024](#) (Pub. L. No. 118-31 §§ 1821-33, 41 U.S.C. 3901 note prec.). This provision mandates that, beginning December 22, 2025, no federal funds awarded through a contract, grant, or cooperative agreement, or otherwise made available may be used to procure a covered unmanned aircraft system (UAS) that is manufactured or assembled by a covered foreign entity. Significantly, no funds may be used in connection with the operation of such a drone or UAS. For more information, refer to [Public Law 118-31](#) and [OMB Memorandum M-26-02, Ensuring Government Use of Secure Unmanned Aircraft Systems and Supporting United States Producers](#).

H. Beneficiary and Participant Eligibility

Beneficiary

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.

Participant

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.

This NOFO and any subsequent federal awards create no rights or causes of action for any beneficiary or participant. Please consult the DHS Standard Terms and Conditions, your awarding agency's terms and conditions, and your awarding documents for more details.

I. Indirect Costs

Indirect costs are allowed for recipients.

Indirect costs (IDC) are costs incurred for a common or joint purpose benefiting 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.

J. Budget Period

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

K. Pre-Award Costs

The following pre-award costs are allowable:

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.

L. Management and Administration Costs

Management and Administration (M&A) costs are allowed.

M&A costs are allowed by the 2026 DHS Appropriations Act (*See, Homeland Security and Further Additional Continuing Appropriations Act*, Pub. L. No. 119-86 (2026), § 302). Recipients may use up to 5% of the amount of the award 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 federal oversight authorities, 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.

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

Homeland Security and Further Additional Continuing Appropriations Act, Pub. L. No. 119-86 (2026).



Step 2: Get Ready to Apply

In this step

Submission Requirements and Application Deadlines	<u>21</u>
---	-----------

Submission Requirements and Application Deadlines

A. Registration

You must have an active [SAM.gov](https://sam.gov) account which includes having a UEI. SAM.gov registration can take several weeks. Begin that process today.

For more detailed instructions for obtaining a UEI number or to register, go to [SAM.gov Entity Registration](https://sam.gov) and click “Get Started.” From the same page, you can also click on the Entity Registration Checklist for the information you will need to register.

You must also have an active account with [Grants.gov](https://grants.gov). You can see step-by-step instructions see the [Quick Start Guide for Applicants](#).

B. Requesting the Application Package

The application package is accessible in the FEMA Grants Outcomes (FEMA GO) system. To access the system, go to <https://go.fema.gov/>.

C. Application and Submission Instructions

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

1. Apply for, update, or verify their UEI number and EIN from the Internal Revenue Service;
2. Provide their UEI number in the application;
3. Have an account with login.gov;
4. Register for, update, or verify their [SAM.gov](https://sam.gov) account and ensure the account is active before submitting the application;
5. 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 the [FEMA GO Startup Guide](#);
6. Submit the complete application in FEMA GO; and
7. Always maintain an active SAM registration with current information during which the applicant has an active federal award, 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 past 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.

D. How to Register to Apply

General Instructions

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

The registration process can take up to four weeks to complete. To ensure an application meets the deadline, applicants are advised to start the required steps well in advance of their submission. Organizations must have a UEI number, EIN, and an active SAM registration.

Obtain a UEI Number

All entities applying for funding, including renewal funding, must have a UEI number.

Obtain Employer Identification Number

In addition to having a UEI number, all entities applying for funding must provide an EIN. The EIN can be obtained from the IRS at [Get an employer identification number](#).

Create a login.gov account

Applicants must have a [login.gov](#) account to register with SAM or update their SAM registration. Applicants can create a login.gov account at [Create an account](#).

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 [SAM.gov](#).

Register with SAM.gov

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

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

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, 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.gov registration may need to be involved in this step. For step-by-step instructions, see the [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.

E. Submitting the Final Application

Applicants will be prompted to submit the standard application information, and any program-specific information required in FEMA GO.

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

F. Application Deadline

July 24, 2026, 11:59 p.m. ET

G. Pre-Application Requirements Deadline

Not Applicable.

H. Post Application Requirements Deadline

Recipients must ensure and maintain adoption and implementation of NIMS as a condition of receiving and expending THSGP funds. Information on NIMS implementation, including current implementation objectives and related guidance, is available on FEMA's [NIMS Implementation and Training](#) page.

As a condition of award under this program, THSGP recipients are required to complete a THIRA and SPR by December 31, 2026. The THIRA must be updated and resubmitted at least once every three years while the award remains open, and the SPR must be updated and submitted annually.

I. Effects of Missing Deadlines

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 an email with an official date/time stamp and a FEMA GO tracking number to serve as proof of timely submission before the application deadline.

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



Step 3: Write Your Application

In this step

Application contents and format	<u>25</u>
---------------------------------	-----------

Application Contents and Format

A. Application Requirements

The following forms or information are integrated into the application package in FEMA GO. Applicants should review these forms at [SF-424 Family | Grants.gov](#) before applying to ensure they are providing all required information.

1. SF-424, Application for Federal Assistance;
2. Grants.gov Lobbying Form, Certification Regarding Lobbying;
3. SF-424A, Budget Information (Non-Construction)
 - If construction is permitted under the program, submit SF-424C, Budget Information (Construction), instead of SF-424A;
4. SF-424B, Standard Assurances (Non-Construction)
 - If construction is permitted under the program, submit SF-424D, Standard Assurances (Construction), instead of SF-424B; and
5. SF-LLL, Disclosure of Lobbying Activities.

B. Required Documents, Content, and Formatting

See section below.

C. Program-Specific Required Documents and Information

The following program-specific forms or information are required to be submitted in [FEMA GO](#):

- THSGP IJ (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).

D. Post-Application Requirements for Successful Applicants

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 ASIR 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.

d. Program-Specific Conditions of Award

Successful applicants must comply with THSGP-specific conditions of award including adoption and implementation of NIMS and completion of a THIRA and SPR, as described in the Eligibility and Program Description sections of this NOFO.



Step 4: Learn about the Award Review Process

In this step

Application Review Information	<u>28</u>
Intergovernmental Review	<u>31</u>

Application Review Information

A. Threshold Criteria

Only directly eligible tribes as defined in the [Eligibility](#) section of this NOFO 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.

1. 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.

2. Ineligible Projects

- Projects not aligning 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](#).

3. 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

1. Programmatic Criteria

- FEMA will evaluate applications based on how well proposed investments align with THSGP program goals and objectives, address identified capability gaps and national or enduring priorities, and demonstrate feasibility, effectiveness, and cost-effectiveness. Applications should clearly describe the capability gaps being addressed, the proposed solution, and the expected outcomes and impacts on tribal homeland security and resilience. The detailed review steps and scoring procedures, including threshold, programmatic, and financial integrity reviews, are described in the Award Review Process section of this NOFO.

2. 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 sections of the IJ template: Overview, Baseline, Project Management and Milestones, and Accomplishments and Impact.

The questions the reviewers will score are:

- I. **Overview Section (5 possible points)**
 - How well are the activities described, including any activities that include planning, organization, equipment, training and/or exercises?
- II. **Baseline Section (5 possible points)**
 - How well does this identify existing capability levels and address capability gaps?
- III. **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?
- IV. **Accomplishments and Impact Section (5 possible points)**
 - Does the outcome(s) demonstrate progress towards building the capability gap(s) identified in the investment?

C. Financial Integrity Criteria

Before making an award, the awarding agency 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; and
5. Ability to effectively implement statutory, regulatory, or other requirements.

D. Supplemental Financial Integrity Criteria and Risk Review

Before making an award expected to exceed the simplified acquisition threshold, defined at 41 U.S.C. § 134, over the period of performance:

1. The awarding agency 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](#), the awarding agency will consider any comments by the applicant.

E. Reviewer Selection

A panel of reviewers will analyze and score the investments from all applications that the FEMA HQ program staff determine to be complete and eligible. DHS/FEMA will select and assign reviewers from federal staff within the Agency 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 DHS/FEMA preparedness grant programs 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 2026 THSGP funding is exhausted. 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. 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.

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. No further action is needed if you do not find a contact for your state in the [latest version of the SPOC list](#).

Note: This requirement does not apply to tribal governments.



Step 5: Learn What Happens After Award

In this step

Award Notices	<u>33</u>
Post-award requirements and administration	<u>33</u>
Other	<u>43</u>

Award Notices

A. Notice of Award

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

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

Recipients must accept their awards no later than 60 days after the award date. Recipients shall notify FEMA of their intent to accept the award and proceed with work in the FEMA GO system.

Funds will remain on hold until the recipient accepts the award in 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 prior to award is at the applicant or sub-applicant's own risk.

D. Obligation of Funds

The grant funds are obligated in accordance with applicable laws, and no later than upon award.

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 1 of this award cycle. Applicants may contact the program office for additional feedback.

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.

Pursuant to the preliminary injunction order issued on November 21, 2025, in *County of Santa Clara et al. v. Noem, et al.*, No. 25-cv-08330-WHO (N.D. Cal.), this requirement does not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect. If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, this requirement will immediately become effective. Also, pursuant to the preliminary injunction order issued on November 21, 2025, in *City of Chicago et al. v. Noem, et al.*, No. 25-CV-12765 (N.D. Ill.), this requirement does not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect. If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, this requirement will immediately become effective.

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](#).

Termination of a Federal Award

The termination condition listed below applies to the grant award and the “Termination of a Federal Award” term and condition in the FY 2026 DHS Standard Terms and Conditions does not.

Termination of the federal award by FEMA

1. The termination condition below applies to the grant award and the “Termination of a Federal Award” term and condition in the FY 2026 DHS Standard Terms and Conditions does not.
2. Termination of the federal award by FEMA
FEMA, in its sole discretion, may terminate the federal award in whole or in part for one of the following reasons consistent with [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. FEMA determines that a specific award objective is ineffective at achieving program goals as described in this NOFO;
 - ii. FEMA determines that an objective of the award as described in this NOFO will be ineffective at achieving program goals or agency priorities;
 - iii. FEMA determines that the design of the grant program is flawed relative to program goals or agency priorities;
 - iv. FEMA determines that the grant program is not aligned to either the DHS Strategic Plan, the FEMA Strategic Plan, or successor policies or documents;
 - v. FEMA 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](#).
 - d. For convenience, including if the award no longer advances the national interest. Termination for convenience only applies to discretionary awards, as that term is defined at [2 C.F.R. § 200.1](#). The term “discretionary award” does not include grants where legislation establishes an entitlement to the funds on the part of the recipient, such as block grants or those awarded based on a statutory formula.
3. Termination of a Subaward by the Pass-Through Entity
 - a. 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](#):
 - i. If the subrecipient fails to comply with the terms and conditions of the federal award.
 - ii. 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.
 - b. If the pass-through entity’s award has been terminated the pass-through entity must terminate its subawards.
4. Termination by the Recipient or Subrecipient

The recipient or subrecipient may terminate the federal award in whole or in part as identified in [2 C.F.R. § 200.340](#) upon sending FEMA or pass-through entity a written notification of the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if FEMA or pass-through entity determines that the remaining portion of the federal award will not accomplish the purposes for which the federal award was made, FEMA or pass-through entity may terminate the federal award in its entirety.
5. Impacts of Termination
 - a. When FEMA terminates the federal award in whole or in part before the end of the period of performance due to the recipient’s or subrecipient’s material failure to comply with the terms and conditions of the federal award, FEMA will report the termination in SAM.gov in the manner described at [2 C.F.R. § 200.340\(c\)](#).
 - b. When the federal award is terminated in part or its entirety, FEMA or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in [2 C.F.R. §§ 200.344](#) and [200.345](#).

6. Notification requirements

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

7. Opportunities to Object and Appeals

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

8. Effects of Suspension and Termination

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

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 federal award, unless a term and condition specifically indicates otherwise. The DHS Standard Terms and Conditions are available online and can be found at [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 2026 Department of Homeland Security Standard Terms and Conditions, with the following exceptions. The term titled “Communication and Cooperation with the Department of Homeland Security and Immigration Officials” and paragraph (2)(a)(ii) of the term titled “Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act” do not apply to any federal award under this funding opportunity.

Pursuant to the preliminary injunction order issued on November 21, 2025, in *County of Santa Clara et al. v. Noem, et al.*, No. 25-cv-08330-WHO (N.D. Cal.), the following terms and conditions do not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect: (1) The DHS Standard Term and Condition titled “Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act”; and (2) the DHS Standard Term and Condition titled “All Executive Orders Related to Grants”. If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, both terms will immediately become effective. As stated above, Paragraph (2)(a)(ii) of the DHS Standard Term and Condition titled “Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act” will not apply even if the preliminary injunction is stayed, vacated, or extinguished.

Pursuant to the preliminary injunction order issued on November 21, 2025, in *City of Chicago et al. v. Noem, et al.*, No. 25-CV-12765 (N.D. Ill.), the following terms and conditions do not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order

remains in effect: (1) the DHS Standard Term and Condition titled " Federal Anti-Discrimination Laws Material to the Government's Payment Decisions Under the False Claims Act"; and (2) the DHS Standard Term and Condition titled " All Executive Orders Related to Grants". If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, both terms will immediately become effective. As stated above, paragraph (2)(a)(ii) of the DHS Standard Term and Condition titled "Federal Anti-Discrimination Laws Material to the Government's Payment Decisions Under the False Claims Act" will not apply even if the preliminary injunction is stayed, vacated, or extinguished.

Pursuant to the preliminary injunction order issued on October 31, 2025, in *City of Seattle v. Trump, et al.*, No. 2:25-cv-01435-BJR (W.D. Wa.), the following terms and conditions do not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect: the DHS Standard Term and Condition titled " Federal Anti-Discrimination Laws Material to the Government's Payment Decisions Under the False Claims Act ". If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, the term will immediately become effective. As stated above, paragraph (2)(a)(ii) the DHS Standard Term and Condition titled "Federal Anti-Discrimination Laws Material to the Government's Payment Decisions Under the False Claims Act" will not apply even if the preliminary injunction is stayed, vacated, or extinguished.

Note: Although 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 per [2 C.F.R. § 200.303\(e\)](#).

C. Financial Reporting Requirements

Recipients must report obligations and expenditures through a federal financial report. The Federal Financial Report (FFR) form, also known as SF-425, is integrated in FEMA GO but, for reference, is available online at [Post-Award Reporting Forms](#).

Recipients must submit the FFR quarterly throughout the period of performance (POP) as detailed below:

<i>Reporting Period</i>	<i>Report Due Date</i>
October 01 – December 31	January 30
January 01 – March 31	April 30
April 01 – June 30	July 30
July 01 – September 30	October 30

The final FFR is due within 120 calendar days after the end of the POP.

FEMA may withhold future federal awards and cash payments if FFRs are not timely, complete, detailed, and accurate. FFRs showing inadequate progress may also cause future federal awards and cash payments to be withheld.

D. Programmatic Performance Reporting Requirements

1. A Performance Report must be submitted biannually throughout the POP.
2. A Performance Report must include:
 - A brief narrative of overall project(s) status
 - A summary of project expenditures
 - A description of any potential issues that may affect project completion
3. The Progress Report must be submitted through FEMA GO.
4. Performance Report Due Dates are as detailed below:

<i>Reporting Period</i>	<i>Report Due Date</i>
January 1 – June 30	July 30
July 1 – December 31	January 30

E. Closeout Reporting Requirements

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

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

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

Also, pass-through entities are responsible for closing out those subawards as described in [2 C.F.R. § 200.344\(e\)](#); subrecipients are still required to submit closeout materials within 90 calendar days of the subaward period of performance end date. When a subrecipient completes all closeout requirements, pass-through entities must promptly complete all closeout actions in time for the recipient to submit all necessary documentation and information to the awarding agency during the closeout of their prime award.

The recipient is responsible for returning any balances of unobligated or unliquidated funds that have been drawn down that are not authorized to be retained per [2 C.F.R. § 200.344\(e\)](#).

Administrative Closeout

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

F. Additional Reporting Requirements

Bi-Annual Strategy Implementation Report (BSIR) Snapshot

In addition to submitting semi-annual progress reports, recipients are required to complete the BSIR. The BSIR is submitted twice a year—in June and December—and provides detailed updates on the status and progress of funded projects. For comprehensive guidance on BSIR submission and other reporting requirements, see the Preparedness Grants Manual.

G. Disclosing Information per 2 C.F.R. § 180.335

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

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

This requirement is fully described in [2 C.F.R. § 180.335](#). Additionally, [2 C.F.R. § 180.350](#) requires recipients to provide immediate notice to the awarding agency at any time after entering into a federal award if:

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

H. Reporting of Matters Related to Recipient Integrity and Performance

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

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

1. The recipient must maintain the currency of information reported in SAM.gov about civil, criminal, or administrative proceedings described in [paragraph \(b\)](#) of Appendix XII;
2. The required reporting frequency is described in [paragraph \(d\)](#) of Appendix XII.

I. Single Audit Reports

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

J. 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.

K. Program Evaluation

Title I of the [Foundations for Evidence-Based Policymaking Act of 2018](#) (Evidence Act), Pub. L. No. 115-435 (2019), 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 allowed and may not be charged to the federal award.

L. Payment Information

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

Instructions to Grant Recipients Pursuing Payments

FEMA is instituting additional reviews on all grant payments and obligations to ensure allowability in accordance with [2 C.F.R. § 200.305](#). These measures will 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 delivered pursuant to the recipient's 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 per [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) agreement ("Treasury-State agreement") and default procedures codified at [31 C.F.R. part 205](#) and Treasury Financial Manual 4A-200, "Overall Disbursing Rules for All Federal Agencies."

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 in [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" per [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
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.

M. Immigration Conditions

The term titled “Communication and Cooperation with the Department of Homeland Security and Immigration Officials” and paragraph (2)(a)(ii) of the term titled “Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act” in the FY 2026 DHS Standard Terms and Conditions do not apply to any federal award under this funding opportunity.

⁵ Pursuant to the preliminary injunction order issued on November 21, 2025, in County of Santa Clara et al. v. Noem, et al., No. 25-cv-08330-WHO (N.D. Cal.), the DHS Standard Term and Condition titled "Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act" does not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect. If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, the term will immediately become effective.

Pursuant to the preliminary injunction order issued on November 21, 2025, in City of Chicago et al. v. Noem, et al., No. 25-CV-12765 (N.D. Ill.), the DHS Standard Term and Condition titled "Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act" does not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect. If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, the term will immediately become effective.

Pursuant to the preliminary injunction order issued on October 31, 2025, in City of Seattle v. Trump, et al., No. 2:25-cv-01435-BJR (W.D. Wa.), the DHS Standard Term and Condition titled "Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act" does not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect. If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, the term will immediately become effective.

As stated above, Paragraph(2)(a)(ii) of the DHS Standard Term and Condition titled "Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act" will not apply even if any of these preliminary injunctions are stayed, vacated, or extinguished.

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. Environmental Planning and Historic Preservation (EHP) Compliance

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

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

FEMA is sometimes required to consult with other regulatory agencies and the public to complete the review process. Federal law requires EHP review to be completed before federal funds are released to carry out proposed projects. FEMA may not be able to fund projects that are not in compliance with applicable EHP laws, Executive Orders, regulations, and policies. FEMA may recommend mitigation measures, alternative courses of action, or both to lessen impacts to EHP resources and bring the project into EHP compliance. If a proposed project has been evaluated by another federal agency, FEMA may be able to streamline portions of the EHP review by adopting or supplementing previous analyses performed under the National Environmental Policy Act. If a proposed project has previously been reviewed by another federal agency, please provide those documents for FEMA's consideration.

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

All FEMA actions, including grants, must comply with National Flood Insurance Program (NFIP) criteria or any more restrictive federal, state, or local floodplain management standards or building code ([44 C.F.R. § 9.11\(d\)\(6\)](#)). For actions located within or that may affect a floodplain or wetland, the following alternatives must be considered: a) no action; b) alternative locations; and c) alternative actions.

The EHP screening form is available at [Environmental & Historic Preservation Grant Preparation Resources](#).

C. Procurement Compliance

When purchasing under a FEMA award, recipients and subrecipients must comply with the federal procurement standards in [2 C.F.R. §§ 200.317-200.327](#). To assist with determining whether an action is a procurement or instead a subaward, please consult [2 C.F.R. § 200.331](#).

For detailed guidance on the federal procurement standards, recipients and subrecipients should refer to various materials issued by FEMA's Procurement Disaster Assistance Team (PDAT). The [Procurement Under Grants Policy Guide \(PUGPG\)](#) and additional resources can be found on the PDAT website at [Procurement and Contracting](#).

When conducting procurement transactions under a federal award, states, Indian Tribes, the District of Columbia, U.S. territories, and their agencies must follow their own documented procurement policies and procedures as outlined in [2 C.F.R. § 200.317](#). They are also required to comply with rules for domestic preferences ([2 C.F.R. § 200.322](#)), the use of recovered materials ([2 C.F.R. § 200.323](#)), and ensure all necessary contract provisions are included ([2 C.F.R. § 200.327](#)). If these entities do not have documented procurement policies or procedures, they must follow the federal procurement rules listed in [2 C.F.R. §§ 200.318-200.327](#).

Note: Indian Tribes are exempt from the recovered materials requirements in [2 C.F.R. § 200.323](#).

Local government and nonprofit recipients or subrecipients must have and use their own documented procurement procedures that reflect applicable state, local, tribal, and territorial (SLTT) laws and regulations, provided that the procurements conform to applicable federal law and the standards identified in [2 C.F.R. §§ 200.318-200.327](#).

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

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

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

Threshold Increased Effective October 1, 2025

Effective October 1, 2025, the United States OMB increased the federal micro-purchase threshold from \$10,000 to \$15,000 and the federal simplified acquisition threshold from \$250,000 to \$350,000. These updated thresholds now apply to recipient and subrecipient activities under [2 C.F.R. Part 200](#), including procurements and budget approval requests executed on or after October 1, 2025, for all open financial assistance awards.

Procurement Standards: Competition and Conflict of Interest

All procurement transactions under a federal award must provide for full and open competition. To ensure compliance, recipients and subrecipients must avoid practices that restrict competition. Examples of restrictive practices include, but are not limited to:

- Placing unreasonable requirements on firms to qualify to do business;
- Requiring unnecessary experience or excessive bonding;
- Engaging in noncompetitive pricing practices between firms or affiliated companies;
- Awarding noncompetitive contracts to consultants on retainer;
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered; and,
- Taking arbitrary actions during the procurement process.

Real Conflict of Interest

Under [2 C.F.R. § 200.318\(c\)\(1\)](#), local government and nonprofit recipients or subrecipients must maintain written standards of conduct to address conflicts of interest. Employees, officers, or agents involved in the selection, award, or administration of contracts are prohibited from participating if they have a real or apparent conflict of interest. A conflict arises when the individual, their immediate family, partner, or an organization they are affiliated with has a financial or other interest in, or stands to benefit from, a firm considered for a contract.

Additionally, officers, employees, and agents may not solicit or accept gratuities, favors, or anything of monetary value from contractors or subcontractors. However, recipients or subrecipients may establish standards for situations where the financial interest is not substantial, or the gift is an unsolicited item of nominal value. Violating these standards must result in disciplinary actions as outlined in the recipient's or subrecipient's policies.

Organizational Conflict of Interest

Under [2 C.F.R. § 200.318\(c\)\(2\)](#), recipients or subrecipients with a parent, affiliate, or subsidiary organization that is not a state, local, tribal, or territorial (SLTT) government must maintain written standards of conduct to address organizational conflicts of interest. An organizational conflict of interest occurs when a relationship with a parent company, affiliate, or subsidiary compromises, or appears to compromise, the recipient's or subrecipient's impartiality in conducting a procurement action.

Recipients or subrecipients must disclose any potential organizational conflicts of interest in writing to FEMA or the pass-through entity, as required by FEMA policy.

Contractors Drafting Requirements

Per [2 C.F.R. § 200.319\(b\)](#), contractors that develop or draft specifications, statements of work, invitations for bids, or requests for proposals are prohibited from competing for those procurements. FEMA considers this an organizational conflict of interest and extends this restriction to contractors who assist recipients or subrecipients in developing grant applications, project plans, or budgets.

This prohibition also applies to former employees who worked on such activities while employed by the recipient or subrecipient. Unless the recipient or subrecipient solicits and awards a contract that explicitly includes both the development and execution of specifications (or similar elements), and the contract was procured in compliance with [2 C.F.R. §§ 200.317–200.327](#), federal funds cannot be used to pay the contractor to perform the work. This rule applies to all contracts funded with federal grant funds, including pre-award costs (e.g., grant writer fees) and post-award costs (e.g., grant management fees).

Supply Schedules and Purchasing Programs

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

Information on General Services Administration programs, including multiple award schedules, for states, Indian Tribes, and local governments, and their instrumentalities, can be found in [Purchasing Resource and Support for State and Local Government](#).

Procurement Documentation

Per [2 C.F.R. § 200.318\(i\)](#), local government and nonprofit recipients or subrecipients are required to maintain and retain records sufficient to detail the history of procurement. These records must include, but are not limited to, the rationale for the procurement method, selection of contract type, contractor selection or rejection, and the basis for the contract price. States and Indian Tribes are reminded that in order for any cost to be allowable, it must be adequately documented per [2 C.F.R. §200.403\(g\)](#).

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

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

D. Buy America Preference Requirements 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 project are produced in the United States.

Recipients and subrecipients provided funds under this program for an infrastructure project must comply with FEMA's implementation requirements of the Build America, Buy America Act, as detailed in [FEMA's Buy America Preference Policy](#). 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](#).

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.

For more information about FEMA's implementation of the Buy America Preference, please visit FEMA's Buy America Preference webpage at [Programs and Definitions: Build America, Buy America Act | FEMA.gov](#).

Waivers

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

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

- Applying the domestic content procurement preference would be inconsistent with the public interest;
- 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](#).

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](#).

E. 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](#).

F. 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.

G. Record Retention

Record Retention Period

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

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

Types of Records to Retain

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

- Specifications;
- Solicitations;
- Competitive quotes or proposals;
- Basis for selection decisions;
- Purchase orders;
- Contracts;
- Invoices; and,
- Canceled checks.

H. Actions to Address Noncompliance

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

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

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

I. Audits

FEMA grant recipients are subject to audit oversight from multiple entities including the DHS Office of Inspector General (OIG), the GAO, the pass-through entity, or independent auditing firms for single audits, and may cover activities and costs incurred under the award. Auditing agencies such as the DHS

OIG, the GAO, and the pass-through entity (if applicable), and FEMA in its oversight capacity, must have access to records pertaining to the FEMA award.





Contacts and Appendices

Contacts	51
Appendices	53

A. Program Office

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.

B. FEMA Grants News

FEMA Grants News 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 is reachable at fema-grants-news@fema.dhs.gov or (800) 368-6498, Monday through Friday, 9 a.m. – 5 p.m. ET.

C. Award Administration Division

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.

D. Procurement Under Grants Division

The Procurement Disaster Assistance Team (PDAT) and Buy America Branch (BAB) within GPD's Procurement Under Grants Division offer technical support to ensure compliance with federal procurement and domestic preference standards for FEMA awards. You can reach PDAT at fema-gpd-pdat@fema.dhs.gov and BAB at fema-grants-buyamerica@fema.dhs.gov. When reaching out, please include your FEMA grant program point of contact for reference.

E. FEMA Regional Offices

FEMA Regional Offices also may provide fiscal support, including pre- and post-award administration and technical assistance. FEMA Regional Office contact information is available at [Regions, States and Territories](#).

F. Civil Rights

Consistent with Executive Order 14173, Ending Illegal Discrimination & Restoring Merit-Based Opportunity, the FEMA Integration and Coordination Division (ICD) 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-ocr@fema.dhs.gov.

G. Environmental Planning and Historic Preservation

The FEMA Office of Environmental Planning and Historic Preservation (OEHP) provides guidance and information about the EHP review process to FEMA programs and recipients and subrecipients. Send any inquiries regarding compliance for FEMA grant projects under this NOFO to FEMA-OEHP-NOFOQuestions@fema.dhs.gov.

H. Payment and Reporting

FEMA uses FEMA GO for financial reporting, invoicing, and tracking payments. The Direct Deposit/Electronic Funds Transfer (DD/EFT) method of payment is used for recipients. For any questions about the system, contact the FEMA GO Helpdesk at femago@fema.dhs.gov or (877) 585-3242, Monday through Friday, 9 a.m. – 6 p.m. ET.

I. 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 a.m. – 6 p.m. ET.

J. 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.

K. Preparedness Grants Manual

Recipients seeking guidance on policies and procedures for managing preparedness grants should reference the Preparedness Grants Manual at [Preparedness Grants Manual](#).

Appendices

Appendix I

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_npd_developing-and-maintaining-emergency_052125.pdf
2. CISA Infrastructure Resilience Planning Toolkit - <https://www.cisa.gov/resources-tools/programs/resilience-planning>
3. FEMA Citizen Corps - <http://www.ready.gov/citizen-corps>
4. FEMA CERT - <http://www.fema.gov/community-emergency-response-teams>
5. Ready.gov - <http://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.

- 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.

- 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.

- 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 \(dhs.gov\)](#) and [Western Hemisphere Travel Initiative | U.S. Customs and Border Protection \(cbp.gov\)](#).

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@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.