

The Department of Homeland Security (DHS)

Notice of Funding Opportunity (NOFO)

Fiscal Year (FY) 2025 Intercity Bus Security Grant Program (IBSGP)

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

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1. Basic Information

A. Agency Name	U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA)
B. NOFO Title	Fiscal Year 2025 Intercity Bus Security Grant Program
C. Announcement Type	Initial
D. Funding Opportunity Number	DHS-25-GPD-057-00-97
E. Assistance Listing Number	97.057
F. Expected Total Funding	\$1,800,000
G. Anticipated Number of Awards	14 awards
H. Expected Award Range	\$20,000– \$1,800,000
I. Projected Application Start Date	08/01/2025 12:00 p.m. Eastern Time (ET)
J. Projected Application End Date	08/15/2025 5:00 p.m. Eastern Time (ET)
K. Anticipated Funding Selection Date	08/23/2025
L. Anticipated Award Date	No Later Than 09/30/2025
M. Projected Period of Performance Start Date	09/01/2025
N. Projected Period of Performance End Date	08/31/2027
O. Executive Summary	The IBSGP provides funds to intercity bus companies to protect critical surface transportation infrastructure and the traveling public from acts of terrorism.
P. Agency Contact	<p>a. Program Office Contact FEMA has assigned region-specific Preparedness Officers for the IBSGP. If you do not know your Preparedness Officer, please contact FEMA Grants News by phone at (800) 368-6498 or by email at fema-grants-news@fema.dhs.gov, Monday through Friday, 9 a.m. – 5 p.m. ET.</p> <p>b. FEMA Grants News</p>

This channel provides general information on all FEMA grant programs and maintains a comprehensive database containing key personnel contact information at the federal, state, and local levels. FEMA Grants News Team is reachable at fema-grants-news@fema.dhs.gov. OR (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET.

c. *Grant Programs Directorate Award Administration Division (AAD)*

GPD's Award Administration Division provides support regarding financial matters and budgetary technical assistance. AAD can be contacted at ASK-GMD@fema.dhs.gov.

d. *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 <https://www.fema.gov/fema-regional-contacts>.

e. *Civil Rights*

Consistent with Executive Order 14173, *Ending Illegal Discrimination & Restoring Merit-Based Opportunity*, the FEMA Office of Civil Rights is responsible for ensuring compliance with and enforcement of federal civil rights obligations in connection with programs and services conducted by FEMA. They are reachable at FEMA-CivilRightsOffice@fema.dhs.gov.

f. *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.

g. *FEMA Grants Outcomes (GO)*

For technical assistance with the FEMA GO system, please contact the FEMA GO Helpdesk at femago@fema.dhs.gov, or (877) 585-3242, Monday through Friday, 9:00 AM – 6:00 PM ET.

h. *Preparedness Grants Manual (PGM)*

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

2. Eligibility

<p>A. Eligible Entities/Entity Types</p>	<p>Only the following entities or entity types are eligible to apply:</p> <p>a. Applicants</p> <p>1. Eligible Applicants</p> <p>Private operators providing intercity over-the-road bus transportation that have also completed a vulnerability assessment and developed a security plan, which the Secretary of Homeland Security has approved as described in Section 1531 of the <i>Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Act)</i> (Pub. L. No. 110-53) (6 U.S.C. § 1181). Private operators are non-governmental entities that may include, but are not limited to, sole proprietorships, affiliates, parent companies, and subsidiaries.</p> <p>2. Applicant Eligibility Criteria</p> <p>Eligibility for funding is further limited to applicants that meet one or both of the following criteria:</p> <ul style="list-style-type: none">• Operate fixed-route intercity bus transportation providing services to one or more historically eligible Urban Area Security Initiative (UASI) urban areas as indicated below.• Operate a charter bus service using over-the-road buses and provide a minimum of 50 trips annually to one or more historically eligible UASI urban areas as indicated below. <p>The following definitions are applicable for the purpose of meeting FY 2025 IBSGP eligibility requirements:</p> <ul style="list-style-type: none">• Charter bus service is defined as a bus service that operates neither over fixed routes nor on regular schedules. Note: A charter bus service is characterized by the rental of a bus and the services of a driver to a person or group where all passengers embark and disembark at the same point. A charter bus service must use over-the-road buses.• Fixed-route intercity bus service is defined as passenger transportation service provided to the general public for compensation over specified, predetermined, and published routes between cities or terminals using over-the-road-buses.• An over-the-road bus is defined as a vehicle designated for long-distance transportation of passengers, characterized by integral construction with an elevated passenger deck located over a baggage compartment and at least 35 feet in length, with a capacity of more than 30 passengers. Only over-the-road buses are eligible for vehicle security enhancements through this program. Limousines, mini-coaches, school buses,
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	<p>or any other vehicle that does not fit the definition of an over-the-road bus are not eligible.</p> <ul style="list-style-type: none"> • A trip is defined as a single bus journey from an embarkation point to the furthest destination in that journey. For example, a trip from New York City to Denver to San Francisco would be considered a single trip. A trip is made to an historically eligible UASI urban area if at any point in the trip the bus stops in an historically eligible UASI urban area and embarks or disembarks passengers. For example, a trip from Newburgh, New York to New York City to Charleston, West Virginia is a trip to an historically eligible UASI urban area if passengers embark or disembark in New York City. • An historically eligible UASI urban area is a high-risk urban area that has received UASI funding in the past. See Appendix B for additional information. <p>b. Subapplicants Subapplicants and subawards are not allowed.</p>
<p>B. Project Type Eligibility</p>	<p>a. Unallowable Project Types See Section 3.F “Program-Specific Unallowable Costs” for more information on unallowable project types.</p> <p>b. Allowable Project Types Costs generally need to fit within one of the categories listed below to be allowable under this program.</p> <p>Specific investments made in support of the NOFO funding priorities generally fall into one of the following allowable cost categories:</p> <ul style="list-style-type: none"> • Planning • Operational Activities • Equipment and Capital Projects • Training and Awareness Campaigns • Exercises <p>Please see Appendix C for more information on allowable costs.</p> <p>Applicants who have questions about whether a cost is allowable under this program should contact their Preparedness Officer.</p>
<p>C. Requirements for Personnel, Partners, and Other Parties</p>	<p>An application submitted by an otherwise eligible non-federal entity (i.e., the applicant) may be deemed ineligible when the person that submitted the application is not: 1) a current employee, personnel, official, staff, or leadership of the non-federal entity; and 2) duly</p>

	<p><i>authorized to apply</i> for an award on behalf of the non-federal entity at the time of application.</p> <p>Further, the Authorized Organization Representative (AOR) and Signatory Authority (SA) must be a duly authorized current employee, personnel, official, staff or leadership of the recipient and <i>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 or SA of the recipient. It is the sole responsibility of the recipient to keep their points of contact for the organization up-to-date and accurate in all federal systems.</i></p> <p>Applicant’s failure to meet an eligibility criterion by the time of an application deadline will result in the Federal awarding agency returning the application without review or, even though an application may be reviewed, will preclude the Federal awarding agency from making a federal award.</p>
<p>D. Maximum Number of Applications</p>	<p>The maximum number of applications that can be submitted is:</p> <ol style="list-style-type: none"> 1. 1 per eligible applicant
<p>E. Additional Restrictions</p>	<p>Applicants/subapplicants or recipients/subrecipients are required to certify their compliance with federal statutes, DHS directives, polices, and procedures.</p> <p>a. National Incident Management System (NIMS) Implementation Prior to allocation of any federal preparedness awards, recipients must ensure and maintain adoption and implementation of NIMS. The list of objectives used for progress and achievement reporting is on FEMA’s website at https://www.fema.gov/emergency-managers/nims/implementation-training.</p> <p>Please see the Preparedness Grants Manual for more information on NIMS.</p> <p>b. Application Limitations</p> <ul style="list-style-type: none"> • Eligible applicants may only submit one application; and • Each application may include two Investment Justifications (IJs). <p>c. Vulnerability Assessment and Security Plans To be eligible for the FY 2025 IBSGP, operators must have developed or updated their organization’s Vulnerability Assessment and Security Plan (VASP) that must be based on a security assessment, such as the Baseline Assessment for Security Enhancement (BASE) performed by Transportation Security Inspectors-Surface from the Transportation</p>

Security Administration (TSA). Private operators providing transportation with an over-the-road bus system must have completed or updated their VASP within the past three years before the opening of the FY 2025 IBSGP application period. Additionally, a copy of the VASP certification must be submitted along with the application in order to be considered eligible. Failure to include this certification will result in the application being deemed ineligible. All operators must have completed or updated a VASP as required by Section 1531 of the *9/11 Act* (6 U.S.C. § 1181) as follows:

- Assessments and security plans should include, as appropriate:
 - Identification and evaluation of critical assets and infrastructure, including buses, platforms, stations, terminals, and information systems;
 - Identification of vulnerabilities to those assets and infrastructure; and
 - Identification of gaps in physical security; passenger and cargo security; the security of programmable electronic devices, computers, or other automated systems that are used in providing over-the-road bus transportation; alarms, cameras and other communications systems and utilities needed for over-the-road bus security purposes, including dispatching systems; emergency response planning; and employee training.
- Security plans should also include, as appropriate:
 - The identification of a security coordinator having authority to implement security actions, coordinate security improvements, and receive communications from appropriate federal officials regarding over-the-road bus security;
 - A list of needed capital and operational improvements;
 - Procedures to be implemented or used by the operator in response to a terrorist attack, including evacuation and passenger communication plans that include individuals with access and functional needs;
 - The identification of steps taken with state and local law enforcement agencies, emergency responders, and federal officials to coordinate security measures and plans for response to a terrorist attack;
 - A strategy and timeline for conducting training to prepare frontline employees for potential security threats and conditions;
 - Enhanced security measures to be taken by the operator when the Secretary of Homeland Security declares a period of heightened security risk; and

	<ul style="list-style-type: none"> ○ Plans for providing redundant and backup systems required to ensure the continued operation of critical elements of the operator’s system in the event of a terrorist attack. <p>For additional information on the above requirements, please contact TSA at TSA-Surface@tsa.dhs.gov. Project requests will not be considered until bus operators develop and certify vulnerability assessments and security plans. See below for a template VASP certification statement.</p> <p>d. Vulnerability Assessment and Security Plan Certification Statement</p> <p>Applicants must certify that they have had a vulnerability assessment completed and a security evaluation preparedness plan developed or updated within the past three years. Failure to submit this certification or modifying the language in this certification will result in an application not being considered for funding. Applicants are also required to submit their vulnerability assessments and security plans to DHS/FEMA upon request.</p> <p>Please see Appendix A: Vulnerability Assessment for a Vulnerability Assessment signature box.</p>
<p>F. References for Eligibility Factors within the NOFO</p>	<p>Please see the following references provided below:</p> <ol style="list-style-type: none"> 1. “Programmatic Review Criteria” subsection 2. “Financial Integrity Criteria” subsection 3. “Supplemental Financial Integrity Criteria and Review” subsection 4. FEMA may/will request financial information such as Employer Identification Number (EIN) and bank information as part of the potential award selection. This will apply to everyone prospered, including subrecipients.
<p>G. Cost Sharing Requirement</p>	<p>Applicants selected for this award must commit to an acceptable cost share agreement. Otherwise, they will not be funded.</p>
<p>H. Cost Share Description, Type and Restrictions</p>	<p>The FY 2025 IBSGP has a cost-share requirement. The only acceptable form of cost sharing is a hard match, meaning cash, by the recipient. In-kind contributions, also known as soft matches, are not acceptable for the recipient’s cost-share requirement.</p> <p>Eligible IBSGP applicants shall agree to make available non-federal funds to carry out an IBSGP award in an amount equal to, and not less than, 50% of the total project cost as submitted in the application and approved in the award. If the total project cost is ultimately higher</p>

	<p>than anticipated and submitted at the time of application, the recipient is responsible for all additional costs. If the total project cost is less than the amount anticipated at the time of award, the recipient must ensure that it matches the federal funds expended with an amount equal to, and not less than, 50% in non-federal funds. The recipient’s contribution should be specifically identified for each proposed project. The non-federal contribution has the same eligibility requirements as the federal share and must be justified as part of the project within the IJ.</p>
<p>I. Cost Sharing Calculation Example</p>	<p>For example, if the federal award requires a 50% cost share and the total project cost is \$100,000, then:</p> <ul style="list-style-type: none"> • Federal share is 50% of \$100,000 = \$50,000 • Recipient cost share is 50% of \$100,000 = \$50,000 <p>With this example, if the total project cost ends up being \$120,000, the federal share would remain at 50% of the original project cost of \$100,000 (i.e., \$50,000). Conversely, if the total project cost ends up being \$80,000, then federal share would be \$40,000 rather than \$50,000. In that case, the recipient would owe FEMA this \$10,000 as the difference between the 50% cost share under the original project cost versus the decreased actual project cost.</p> <p>These cash, hard-match contributions must consist of eligible costs and must be identified as part of the submitted application. A cash match includes cash spent for project-related costs. The cost match requirement for the IBSGP award may not be met by funds from another federal grant or assistance program or funds used to meet matching requirements for another federal grant or assistance program, unless otherwise permitted by federal statute. Additionally, normal routine operational costs cannot be used as a cost match unless a completely new capability is being awarded. Please see 2 C.F.R. § 200.306, as applicable, for additional guidance regarding cost matching.</p>
<p>J. Required information for verifying Cost Share</p>	<p>Applicants should submit the following cost share (or match) documents:</p> <ol style="list-style-type: none"> 1. Budget Detail Worksheet <p>Please see the “Application Format and Contents” section for more details</p>

3. Program Description

A. Background, Program Purpose, and Program History

The Intercity Bus Security Grant Program (IBSGP) is one of four grant programs that constitute the Department of Homeland Security (DHS)/Federal Emergency Management Agency’s focus on transportation infrastructure security activities. These grant programs are part of a comprehensive set of measures authorized by Congress and implemented by DHS to help strengthen the nation’s critical infrastructure against potential terrorist attacks. The IBSGP provides funds to intercity bus companies to protect critical surface transportation infrastructure and the traveling public from acts of terrorism. Past examples of funded projects include those for cameras that allow for live monitoring, fencing to secure property(ies), and GPS technologies that allow for remote disabling of the bus fleet.

DHS is focused on the criticality of information sharing and collaboration in building a national mindset of preparedness and protecting against terrorism and other threats to our national security. DHS and its homeland security mission were born from the “failures among federal agencies and between the federal agencies and state and local authorities to share critical information related to the threat of terrorism” prior to the September 11, 2001, attacks. However, the threat profile has changed in the past two decades. We now face continuous cyberattacks by sophisticated actors, as well as ongoing threats to soft targets and crowded places, such as rolling stock, passenger terminals, and similar infrastructure. The IBSGP reflects DHS’s commitment to risk-informed investment, collaboration, and resilience. To ensure that priorities reflect the current threat environment, FEMA’s Preparedness Grant Programs are guided by annually designated National Priority Areas (NPAs). The FY 2025 NPAs are:

1. Enhancing the protection of soft targets and crowded places,
 - a. This includes faith-based organizations and election sites;
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.
 - a. Example activities under border crisis response and enforcement may include:
 - i. Participation in the Department of Homeland Security/Immigration and Customs Enforcement 287(g) training program;
 - ii. Cooperation with Immigration and Customs Enforcement detainers; and
 - iii. Other jurisdictional responsibilities to support the enforcement of United States immigration law.

- For FY 2025, the Administration encourages applicants to propose innovative solutions that support the broader homeland security mission reflected in the NPAs, as applicable. Applicants must clearly demonstrate how their proposed projects address an NPA and how they align with the stated purpose and objectives of this NOFO. Projects that do so will have their final review scores increased by a multiplier of 20%.

For FY 2024, 19 applications were received and 14 approved for funding. For a full list of recipients, please refer to [Information Bulletin \(IB\) 517a](#).

B. Goals, Objectives, and Priorities

Goals: Strengthen the nation’s critical transportation infrastructure against risks associated with potential terrorist attacks.

Objectives: The IBSGP achieves this through the following objectives:

1. Building and sustaining core capabilities (identified in the National Preparedness Goal) relevant to transit security and the annual NPAs (see priorities below);
2. Addressing and closing gaps identified in agency vulnerability assessments and security plans; and
3. Continuously engaging in a process of emergency related planning, exercising, and training. Using this cycle to test plans, validate capabilities, identify gaps, inform investments, and continuously update plans to reflect organizational changes, as well as findings from exercises and real-world events.

Priorities: Given the evolving threat landscape, it is incumbent upon DHS/FEMA to continuously evaluate the national risk profile and set priorities that help ensure appropriate allocation of scarce security dollars. The FY 2025 NPAs reflect FEMA’s broader mission across all preparedness efforts. Applicants should be familiar with these NPAs, as they represent DHS’s current focus areas and may shape future guidance:

- Enhancing Protection of Soft Targets/Crowded Places
- Supporting Homeland Security Task Forces and Fusion Centers
- Enhancing Cybersecurity
- Enhancing Election Security
- Supporting Border Crisis Response and Enforcement

Enduring needs include:

- Effective planning
- Training and awareness campaigns
- Equipment and capital projects
- Exercises

The table below provides a breakdown of the NPAs and core capabilities impacted, as well as examples of eligible intercity bus security project types for each area. More information on allowable investments can be found in the Funding Restrictions and Allowable Costs section below. As discussed in Section E, projects that sufficiently address one or more of the NPAs will have their final review scores increased by a multiplier of 20%.

FY 2025 IBSGP Funding Priorities

All priorities in this table concern the Safety and Security and Transportation Lifelines.

Priority Areas	Core Capabilities	Example Project Types
National Priorities		

Priority Areas	Core Capabilities	Example Project Types
Enhancing the Protection of Soft Targets and Crowded Places	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • Physical security enhancements at bus stations located in historically eligible Urban Area Security Initiative (UASI) urban areas <ul style="list-style-type: none"> • Security cameras (closed circuit television) • Security screening equipment and technology for people and baggage • Access controls <ul style="list-style-type: none"> ○ Fencing, barriers, gates, etc. • Remote disabling technology for over-the-road bus fleets • Automatic vehicle location technology • Global positioning software
Supporting Homeland Security Task Forces and Fusion Centers	<ul style="list-style-type: none"> • Intelligence and information sharing • Interdiction and disruption • Public information and warning • Operational coordination • Risk management for protection programs and activities 	<ul style="list-style-type: none"> • Establishing or enhancing multi-agency Homeland Security Task Forces (HSTFs), including operational coordination centers • Enhancing capabilities and integration with local fusion centers • Procurement of technology or equipment to support surveillance, communications, and data analysis • Development of standard operating procedures for information sharing, joint operations, and immigration enforcement coordination • Personnel training, credentialing, and certification to improve interoperability and mission alignment • Intelligence analysis, reporting, and suspicious activity monitoring • Exercises and simulations focused on joint operations, intelligence sharing, or interdiction/disruption of criminal or smuggling networks • Community engagement efforts to foster trust and encourage threat reporting • Information sharing with all DHS components; fusion centers; other operational, investigative, and analytic entities; and other federal law enforcement and intelligence entities • Cooperation with DHS and other entities in intelligence, threat recognition, assessment, analysis, and mitigation • Identification, assessment, and reporting of threats of violence • Intelligence analysis training, planning, and exercises • Coordinating the intake, triage, analysis, and reporting of tips/ leads and suspicious activity, to include coordination with the Nationwide Suspicious Activity Reporting (SAR) Initiative (NSI)

Priority Areas	Core Capabilities	Example Project Types
Enhancing Cybersecurity	<ul style="list-style-type: none"> • Cybersecurity • Intelligence and information sharing • Planning • Public information and warning • Operational coordination • Screening, search, and detection • Access control and identity verification • Supply chain integrity and security • Risk management for protection programs and activities • Long-term vulnerability reduction • Situational assessment • Infrastructure systems • Operational communications 	<ul style="list-style-type: none"> • Cybersecurity risk assessments <ul style="list-style-type: none"> • Projects that address vulnerabilities identified in cybersecurity risk assessments <ul style="list-style-type: none"> ○ Improving cybersecurity of critical infrastructure to meet minimum levels identified by the Cybersecurity and Infrastructure Security Agency and the National Institute of Standards and Technology Cybersecurity Framework (Version 1.1) ○ Adoption of cybersecurity performance goals (CISA's Cross-Sector Cybersecurity Performance Goals) • Cybersecurity training and planning
Enhancing Election Security	<ul style="list-style-type: none"> • Cybersecurity • Intelligence and information sharing • Planning • Long-term vulnerability reduction • Situational assessment • Infrastructure systems • Operational coordination • Community resilience 	<ul style="list-style-type: none"> • Prioritize compliance with the VVSG 2.0 established by the U.S. Election Assistance Commission • Complete testing through a VSTL accredited by the U.S. Election Assistance Commission • Physical security planning and exercise support • Physical/site security measures – e.g., locks, shatter proof glass, alarms, access controls, etc. • General election security navigator support • Cyber and general election security navigator support • Cybersecurity risk assessments, training, and planning • Projects that address vulnerabilities identified in cybersecurity risk assessments • Iterative backups, encrypted backups, network segmentation, software to monitor/scan, and endpoint protection • Distributed Denial of Service protection • Migrating online services to the “.gov” internet domain • Online harassment and targeting prevention services • Public awareness/preparedness campaigns discussing election security and integrity measures • Long-term vulnerability reduction and community resilience
Supporting Border Crisis Response and Enforcement	<ul style="list-style-type: none"> • Training and awareness • Community resilience • Operational coordination • Risk management for protection programs and activities 	<ul style="list-style-type: none"> • Staffing support to expand 287(g) screening operations within correctional facilities • Operational overtime costs directly tied to 287(g) screening, processing, and enforcement activities

Priority Areas	Core Capabilities	Example Project Types
		<ul style="list-style-type: none"> • Training programs for state and local law enforcement officers in immigration law, civil rights protections, and 287(g) procedures • Development or enhancement of information-sharing platforms between ICE and local agencies • Procurement of 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 local law enforcement to test operational coordination • Support for facilities upgrades, such as creating dedicated interview rooms and secure processing spaces • Community engagement and public briefings to promote transparency and understanding of 287(g) operations and protections
Enduring Needs		
Planning	<ul style="list-style-type: none"> • Planning • Risk management for protection programs and activities • Risk and disaster resilience assessment • Threats and hazards identification • Operational coordination • Community resilience 	<ul style="list-style-type: none"> • Development of: System-wide Security Risk Management Plans <ul style="list-style-type: none"> ○ Continuity of Operations Plans ○ Response Plans/Station Action Plans ○ System-wide and/or asset-specific vulnerability assessments ○ Efforts to strengthen governance integration between/among regional partners
Training and Awareness	<ul style="list-style-type: none"> • Long-term vulnerability reduction • Public information and warning • Operational coordination • Situational assessment • Community resilience 	<ul style="list-style-type: none"> • Security training for employees, to include: <ul style="list-style-type: none"> ○ Basic security awareness ○ Active shooter/attacker, including integrating the needs of persons with disabilities • Public awareness/preparedness campaigns
Equipment and Capital Projects	<ul style="list-style-type: none"> • Long-term vulnerability reduction • Infrastructure systems • Operational communications • Interdiction and disruption • Screening, search, and detection • Access control and identity verification • Physical protective measures • Supply chain integrity and security • Threats and hazards identification • Infrastructure systems 	<ul style="list-style-type: none"> • Top Transit Asset List (TTAL) risk remediation • Protection of other high-risk, high-consequence areas or systems that have been identified through systemwide risk assessments • Chemical, Biological, Radiological, Nuclear, and Explosive detection, prevention, response, and recovery equipment • Security screening equipment and technology for people and baggage Unmanned Aircraft Systems and detection technologies

Priority Areas	Core Capabilities	Example Project Types
	<ul style="list-style-type: none"> Intelligence and information sharing 	
Exercises	<ul style="list-style-type: none"> Long-term vulnerability reduction Operational coordination Operational communications Community resilience 	<ul style="list-style-type: none"> Response exercises

a. Priority Investments

FY 2025 IBSGP aligns with the Administration’s priorities by directing resources toward the most urgent threats facing the Nation. IBSGP supports the development and sustainment of core capabilities essential to achieving the National Preparedness Goal (NPG): “A secure and resilient Nation.”

To ensure strategic focus, DHS has identified five NPAs that reflect the evolving risk landscape and national policy objectives. These priorities serve as a framework for targeting investments that build capability, reduce risk, and promote cross-sector coordination.

The FY 2025 NPAs are:

- Enhancing Protection of Soft Targets/Crowded Places
- Supporting Homeland Security Task Forces and Fusion Centers
- Enhancing Cybersecurity
- Enhancing Election Security
- Supporting Border Crisis Response and Enforcement

These NPAs are rooted in the core mission areas of the NPG—prevention, protection, mitigation, response, and recovery—and reflect a whole-of-government approach to homeland security. Applicants should use these priorities to guide planning, investment, and implementation to drive measurable outcomes and long-term resilience.

b. Additional Information

1. Enhanced Protection of Soft Targets/Crowded Places

Soft targets and crowded places are increasingly appealing to terrorists and other violent extremist actors because of their relative accessibility and the large number of potential targets. This challenge is complicated by the prevalent use of simple tactics and less sophisticated attacks. Segments of our society are inherently open to the general public, and by nature of their purpose do not incorporate strict security measures. Given the increased emphasis by terrorists and other violent extremist actors to leverage less sophisticated methods to inflict harm in public areas, it is vital that the public and private sectors collaborate to enhance security of locations such as rolling stock, transportation centers, passenger stations, and similar infrastructure. Additional resources and information regarding securing soft targets and crowded places are available through the Cybersecurity and Infrastructure Security Agency.

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
- Protection of economic and critical infrastructure

3. Enhancing Cybersecurity

Cybersecurity investments must support the security and functioning of critical port infrastructure and core capabilities as they relate to achieving target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism at maritime infrastructure facilities. Additional resources and information regarding cybersecurity and cybersecurity performance goals are available through the [Cybersecurity and Infrastructure Security Agency](#), [Cross-Sector Cybersecurity Performance Goals](#), and the [National Institute of Standards and Technology](#).

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 Election Security NPA, 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.

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.

C. Program Rationale

The stated goals, objectives, and priorities of IBSGP support Section 1532 of the *Implementing Recommendations of the 9/11 Commission Act of 2007* (Pub. L. No. 110-53) (6 U.S.C. § 1182) by strengthening the nation’s critical transportation infrastructure against risks associated with potential terrorist attacks.

D. Federal Assistance Type Grant

E. Performance Measures and Targets

Performance metrics for this program are as follows:

- Performance Measure Name 1: Cybersecurity vulnerabilities reduced at IBSGP funded Bus Organizations (1 reduced vulnerability)
- Performance Measure Name 2: Number of Facility Security Enhancements at funded IBSGP Bus Organizations (10 enhancements)
- Performance Measure Name 3: Number of Vehicle Security Enhancements at funded IBSGP Bus Organizations (10 enhancements)
- Performance Measure Name 4: Number of Security related Trainings conducted (5 trainings)
- Performance Measure Name 5: Number of related Exercises conducted (5 exercises)
- Performance Measure Name 6: Number of Public Awareness Campaigns conducted (5 campaigns)

F. Program-Specific Unallowable Costs

Specific unallowable costs include:

- General-use facility expenditures, to include, but not limited to ordinary facility maintenance, contracts for maintenance, and specifically backup or emergency generators;
 - General vehicle maintenance, service contracts, or warranties. This is different from maintenance and sustainment costs that are allowable, but only for projects funded under a grant award. For projects or equipment not funded by the grant award, general maintenance, service contracts, and warranties are not allowable;
 - Expenditures for items such as general-use software (word processing, spreadsheet, graphics, etc.), general-use computers and related equipment (other than for allowable Management & Administration (M&A) activities, or otherwise associated preparedness or response functions), general-use vehicles, licensing fees, recurring operating costs (e.g., cell phone services, maintenance contracts);
 - Organizational operating expenses;
 - Personnel costs, to include, but not limited to, overtime and backfill (except as detailed above);
 - Activities unrelated to the completion and implementation of the IBSGP;
 - Other indirect costs (meaning property purchase, depreciation, or amortization expenses);
 - Initiatives in which federal agencies are the beneficiary or that enhance federal property;
 - Initiatives which study technology development;
 - Proof-of-concept initiatives;
 - Initiatives that duplicate capabilities being provided by the Federal Government; and
 - Pre-award costs are not allowable and will not be approved, with the exception of costs resulting from pre-award grant writing services provided by an independent contractor that shall not exceed \$1,500, as detailed in the “Pre-Award Costs” section above.

G. General Funding Requirements

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

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

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

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

H. Indirect Costs (Facilities and Administrative Costs)

Indirect costs are allowed for recipients.

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

I. Management and Administration (M&A) Costs

M&A costs are allowed by the Full-Year Continuing Appropriations and Extensions Act, 2025, Pub. L. No. 119-2. Recipients may use up to 5% of the amount of the award for their M&A. M&A activities are those defined as directly relating to the management and administration of IBSGP funds, such as financial management and monitoring. M&A expenses must be based on actual expenses or known contractual costs. 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 cost examples include preparing and submitting required programmatic and financial reports, establishing and/or maintaining equipment inventory, documenting operational and equipment expenditures for financial accounting purposes; responding to official informational requests from state and federal oversight authorities; and grant performance measurement or evaluation activities. 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 Appendix C.

J. Pre-Award Costs

Pre-award costs are not allowable and will not be approved, with the exception of costs resulting from pre-award grant writing services provided by an independent contractor that shall not exceed \$1,500 per applicant per year.

K. Beneficiary Eligibility

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

L. Participant Eligibility

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

M. Authorizing Authority

Section 1532 of the *Implementing Recommendations of the 9/11 Commission Act of 2007* (Pub. L. No. 110-53) (6 U.S.C. § 1182)

N. Appropriation Authority

Full-Year Continuing Appropriations and Extensions Act, 2025, Pub. L. No. 119-2.

O. Budget Period

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

P. Prohibition on Covered Equipment or Services

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

4. Application Contents and Format

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

Not Applicable.

R. Application Content and Format

Not Applicable.

S. Application Components

The following forms or information are required to be submitted via FEMA GO. Applicants can complete these forms directly in FEMA GO without needing to upload PDF versions of the forms. The Standard Forms (SF) are also available at [Forms | Grants.gov](#):

- SF-424, Application for Federal Assistance
- Grants.gov Lobbying Form, Certification Regarding Lobbying
- SF-424A, Budget Information (Non-Construction)
 - For construction under an award, submit SF-424C, Budget Information (Construction), in addition to or instead of SF-424A
- SF-424B, Standard Assurances (Non-Construction)
 - For construction under an award, submit SF-424D, Standard Assurances (Construction), in addition to or instead of SF-424B
- SF-LLL, Disclosure of Lobbying Activities

T. Program-Specific Required Documents and Information

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

- Associated Investment Justification(s)

- Associated detailed budget
- VASP certification statement

c.

d. *Investment Justification*

As part of the FY 2025 IBSGP application process, applicants must develop one or two IJ(s) that address the initiative being proposed for funding, including Management and Administration (M&A) costs. The IJs must demonstrate how proposed activities address gaps and deficiencies (identified in a current vulnerability assessment) in current programs and capabilities, and link to one or more core capabilities identified in the National Preparedness Goal. Please see www.grants.gov for the IJ template.

The applicant may attach the vulnerability assessment or cite relevant sections/passages within the IJs to demonstrate the linkage between the project request and the identified vulnerability. The IJs should also describe the applicant’s current security posture to demonstrate why the proposed project is necessary and appropriate. The IJs must demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA.

IBSGP projects must be: 1) both feasible and effective at reducing the risks for which the project was designed, and 2) able to be fully completed within the two-year period of performance. Applicants must ensure that the IJs are consistent with all requirements outlined in this NOFO. Applicants must provide information in the following categories for their single proposed investment:

1. Background
2. Strategic and Program Priorities
3. Impact
4. Funding/Implementation Plan

Applicants must use the following file naming convention when submitting their IJs as part of the FY 2025 IBSGP:

Organization_Name_Project_Name

Failure to adhere to the naming convention above may result in your application being considered ineligible.

e. *Detailed Budget*

Applicants must provide a detailed budget for the funds requested. The detailed budget must be submitted with the grant application as a file attachment within FEMA GO. The budget must be complete, reasonable, and cost-effective in relation to the proposed project. The budget should provide the basis of computation of all project-related costs, any appropriate narrative, and a detailed justification of M&A costs. Applicants receiving funds may not obligate, expend, or draw down funds until budgets and budget narratives have been approved by DHS/FEMA. The

budget detail worksheet may be used as a guide to assist applicants in the preparation of budgets and budget narratives. **Note: Design and Planning/Engineering costs must be clearly identified in a separate line item in order for partial funding to be released prior to Environmental Planning and Historic Preservation (EHP) review and approval.** Please see the [Preparedness Grants Manual](#) for information on the EHP review process.

Detailed budgets must be submitted with the grant application as a file attachment within FEMA GO. Applicants must use the following file naming convention when submitting detailed budgets as part of the FY 2025 IBSGP application process:

Organization_Name_Budget_Name

Failure to adhere to the naming convention above may result in your application being considered ineligible.

f. Sensitive Security Information (SSI) Requirements

A portion of the information that is routinely submitted in the course of applying for funding, reporting under certain programs, or that is provided in the course of an entity's grant management activities under those programs that are under federal control may be subject to protection under an SSI marking and must be properly identified and marked accordingly. SSI is a control designation used by DHS/FEMA to protect transportation security-related information. It is applied to information about security programs; vulnerability and threat assessments; screening processes; technical specifications of certain screening equipment and objects used to test screening equipment; and equipment used for communicating security information relating to air, land, or maritime transportation. Further information can be found at 49 C.F.R. Part 1520, Protection of Sensitive Security Information.

For the purposes of the IBSGP, and due to the high frequency of SSI found in IBSGP IJs, all IBSGP IJs shall be considered SSI and treated as such until they have been subject to review for SSI by DHS/FEMA. Therefore, applicants shall label all application documents as SSI in accordance with 49 C.F.R. § 1520.13.

U. Post-Application Requirements for Successful Applicants
Not Applicable.

5. Submission Requirements and Deadlines

V. Address to Request Application Package

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

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

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

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

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

How to Register to Apply:

General Instructions:

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

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

Organizations must have a Unique Entity Identifier (UEI) number, Employer Identification Number (EIN), and an active System for Award Management (SAM) registration.

Obtain a UEI Number:

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

Obtain Employer Identification Number:

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

Create a login.gov account:

Applicants must have a login.gov account in order to register with SAM or update their SAM registration. Applicants can create a login.gov account at: https://secure.login.gov/sign_up/enter_email?request_id=34f19fa8-14a2-438c-8323-a62b99571fd.

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

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

Register with SAM:

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

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

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

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

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

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

Google Chrome;

Mozilla Firefox;

Apple Safari; and

Microsoft Edge.

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

Submitting the Final Application:

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

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

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

W. Application Deadline

08/15/25 05:00:00 PM Eastern Time

X. Pre-Application Requirements Deadline

Not applicable.

Y. Post-Application Requirements Deadline

Not applicable.

Z. Effects of Missing the Deadline

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

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

6. Intergovernmental Review

AA. Requirement Description and State Single Point of Contact

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

7. Application Review Information

BB. Threshold Criteria

FEMA conducts reviews of all applications received to compare them for duplication including the narrative statements and statistical data. Therefore, all elements of the narrative statements must be specific and unique to the applying entity, and all statistical data must be accurate. Applications with narrative statements that have substantial duplication of statements, sentences, or paragraphs to other submitted applications, or inaccurate data that may mislead reviewers may be disqualified. Discovery of falsification, fabrication, or plagiarism of other grant proposals will disqualify the application(s).

Note: FEMA evaluates each application on its merit, veracity, and accuracy to ascertain how the narrative statement(s) outlined within the application depicts the applicant's and their organization's uniqueness, their particular risks, and how selecting them over a similarly situated applicant advances the objectives of the IBSGP program to assist transportation agencies with the capabilities to respond to threats and assure that traveling public has adequate protection from all hazards.

CC. Application Criteria

a. Overview

Applications will first be screened for eligibility and then reviewed by subject matter experts on a National Review Panel (NRP). The NRP will evaluate and score each application based on the evaluation criteria outlined in the following sections. The NRP will then develop funding recommendations and project approvals that will be forwarded to an Executive Committee. The Executive Committee will recommend funding decisions and projects that are presented to the Secretary of Homeland Security. Ultimately, final funding determinations are at the discretion of the Secretary of Homeland Security.

b. Pre-NRP Review Process

The pre-NRP process consists of the initial application submission processing and download, eligibility checks, and the necessary panel preparations scheduled before formal NRP meetings hosted by FEMA. Applications that meet administrative and eligibility requirements outlined in this NOFO will be assigned to, and evaluated by, the NRP. All eligibility screens will be completed prior to the NRP convening.

c. NRP Review Process

Each application that meets the minimum requirements for application submission in accordance with the FY 2025 IBSGP NOFO will be evaluated by the NRP. FEMA will invite partner agencies, including the Transportation Security Administration (TSA), to participate in the NRP review process. The NRP will score and evaluate the entirety of eligible IBSGP applications and produce a rank order listing of proposed projects with associated comments. The key output from the NRP will be a list of recommended projects for the Executive Committee to review.

d. Post-NRP Review Process

The Executive Committee will review the NRP's scoring summary and funding recommendations. FEMA and TSA will then brief the final results of the Executive Committee's review, recommended projects, and funding summary to senior DHS/FEMA leadership. Ultimately, final funding determinations are at the discretion of the Secretary of Homeland Security.

e. NRP Scoring Criteria

FY 2025 IBSGP applications will be evaluated through a review process for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed investments. Applicants can score a maximum of 100 points in this evaluation process. Applications requesting funds will be reviewed and selected based on the following criteria:

- Scope of work (purpose and objectives of the project, identification of what is being protected);
- Desired outcomes, including expected long-term impact where applicable;
- Summary of status of planning and design accomplished to date (e.g., included in a capital improvement plan); and
- Project schedule.

Funding Guidelines. The IJs should provide details on specific needs to be addressed, vision, goals, and objectives. It should also provide evidence of how the project fits into an overall effort to meet critical infrastructure security requirements, and how the investment provides a significant security impact.

Possible Review Panel Funding Guidelines Score: 0-20 points

Cost effectiveness. Projects will be evaluated and prioritized based on the expected impact on security relative to the investment. The IJs should provide quantitative evidence of the security impact, as well as justification for the strategic use of the proposed budget. The project cost levels should be commensurate with the security impact, and the proposed solution should be reasonable and advantageous over other possible solutions.

Possible Review Panel Cost Effectiveness Score: 0-15 points

Ability to reduce risk of catastrophic events. Projects will be evaluated and prioritized based on their ability to reduce risk. The IJs should demonstrate an ability to reduce risk, providing quantitative evidence of the project’s security impact, potential consequences of not funding the project, and a strategy to address specific risk areas. The IJs should also reflect robust regional coordination and an investment strategy that institutionalizes regional security strategy integration in the nation’s highest risk metropolitan areas.

Possible Review Panel Risk Reduction Score: 0-35 points

Sustainability without additional federal funds and leveraging of other funding.

Projects will be evaluated and prioritized regarding the extent to which they exhibit a likelihood of success, or continued success, without requiring additional federal assistance.

Possible Review Panel Sustainability Score: 0-10 points

Timelines. Projects will be evaluated and prioritized on the ability of the applicant to complete the proposed project within submitted timelines. The IJs should provide a timeline and demonstrate evidence of ability to complete the project within the submitted timeline based on proposed strategy, identified implementation challenges, management and resource plan, and reasonableness of anticipated schedule.

Possible Review Panel Timelines Score: 0-10 points

Risk to critical infrastructure. The FY 2025 IBSGP will use risk-based prioritization consistent with DHS policy. This score is calculated using a risk process developed and maintained by TSA and provided separately in accordance with proper SSI handling protocol. Scores from TSA are informed by their risk methodology ranking, the relative risk of high-risk UASI urban areas, and giving higher priority to those applicants with routes passing through underwater tunnels.

Possible Review Panel Critical Infrastructure Score: 0-10 points

National Priority Areas. Projects that sufficiently address one or more of the NPAs (See Section 3.B) will have their final scores increased by a multiplier of 20%.

Possible Review Panel National Priorities Score: Increase by a multiplier of 20%

DHS/FEMA may conduct additional pre-award vetting of proposed recipients, to include whether any of the bus companies have been declared an “imminent hazard” or fined by either the federal or any state department of transportation.

DHS/FEMA Headquarters (HQ) Grants Management Specialists will also conduct a financial review using the following criteria:

- Allowability, allocability, and financial reasonableness of the proposed budget and investment information; and
- Whether a recipient meets the financial and legal requirements listed in 2 C.F.R. Part 200.

DD. Financial Integrity Criteria

Before making an award, FEMA is required to review Office of Management and Budget (OMB)-designated databases for applicants’ eligibility and financial integrity information. This is required by [the Payment Integrity Information Act of 2019 \(Pub. L. No. 116-117, § 2 \(2020\)\)](#), [41 U.S.C. § 2313](#), and [the “Do Not Pay Initiative” \(31 U.S.C. 3354\)](#). For more details, please see [2 C.F.R. § 200.206](#).

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

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

EE. Supplemental Financial Integrity Criteria and Review

Before making an award expected to exceed the simplified acquisition threshold (currently a total federal share of \$250,000) over the period of performance:

1. FEMA is required by [41 U.S.C. § 2313](#) to review or consider certain information found in SAM.gov. For details, please see [2 C.F.R. § 200.206\(a\)\(2\)](#).
2. An applicant may review and comment on any information in the responsibility/qualification records available in SAM.gov.
3. Before making decisions in the risk review required by [2 C.F.R. § 200.206](#), FEMA will consider any comments by the applicant.

FF. Reviewers and Reviewer Selection

National Review Panelists are comprised of FEMA’s joint Federal agency working group member SMEs from TSA, Department of Transportation (DOT), and FEMA. Administrative

reviewers are comprised of full-time FEMA staff assigned to the IBSGP. All reviewers are provided review guidelines that are aligned to this NOFO and include references to ensure consistency and standardization of reviews.

GG. Merit Review Process

See section “7. Application Review Information” for evaluation criteria, weighted scoring and merit-based approach for application reviews.

HH. Final Selection

The Executive Committee will recommend funding decisions and projects that are presented to the Secretary of Homeland Security. Ultimately, final funding determinations are at the discretion of the Secretary of Homeland Security.

8. Award Notices

II. Notice of Award

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

By submitting an application, applicants agree to comply with the prerequisites stated in this NOFO, the [Preparedness Grants Manual](#), and the material terms and conditions of the federal award, should they receive an award.

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

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

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

JJ. Pass-Through Requirements

Not Applicable. The IBSGP does not permit pass-through funding.

KK. Note Regarding Pre-Award Costs

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

LL. Obligation of Funds

The funds are obligated only when and once the agency’s signatory authority approves and signs the award package.

MM. Notification to Unsuccessful Applicants

Applicants will be notified electronically through FEMA GO within 90 days of the official FY 2025 IBSGP award announcement.

9. Post-Award Requirements and Administration

NN. Administrative and National Policy Requirements

Presidential Executive Orders

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

In accordance with [Executive Order 14305, Restoring American Airspace Sovereignty \(June 6, 2025\)](#), and to the extent allowed by law, eligible state, local, tribal, and territorial grant recipients under this NOFO are permitted to purchase unmanned aircraft systems, otherwise known as drones, or equipment or services for the detection, tracking, or identification of drones and drone signals, consistent with the legal authorities of state, local, tribal, and territorial agencies. Recipients must comply with all applicable federal, state, and local laws and regulations, and adhere to any statutory requirements on the use of federal funds for such unmanned aircraft systems, equipment, or services.

Subrecipient Monitoring and Management

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

OO. DHS Standard Terms and Conditions

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

A recipient under this funding opportunity must comply with the FY 2025 Department of Homeland Security Standard Terms and Conditions, v. 3 (Apr. 18, 2025), with the exception Paragraph C.IX (Communication and Cooperation with the Department of Homeland Security and Immigration Officials) and paragraph C.XVII(2)(a)(iii) (Anti-Discrimination Grant Award Certification regarding immigration). Paragraphs C.IX and C.XVII(2)(a)(iii) do not apply to any federal award under this funding opportunity. The FY 2025 Department of Homeland Security

Standard Terms and Conditions, v. 3 (Apr. 18, 2025) are available at www.dhs.gov/publication/dhs-standard-terms-and-conditions.

PP. Financial Reporting Requirements

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

QQ. Programmatic Performance Reporting Requirements

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

RR. Closeout Reporting Requirements

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

Additional Reporting Requirements

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

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

See the [Preparedness Grants Manual](#) for information on disclosing information per [2 C.F.R. § 180.335](#).

TT. Reporting of Matters Related to Recipient Integrity and Performance

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

UU. Single Audit Report

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

VV. Monitoring and Oversight

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

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

WW. Program Evaluation

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

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

XX. Additional Performance Reporting Requirements
Not applicable.

YY. Termination of the Federal Award

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

2. Termination of the Federal Award by FEMA

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

- a. If the recipient or subrecipient fails to comply with the terms and conditions of the federal award.

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

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

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

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

4. Termination by the Recipient or Subrecipient

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

5. Impacts of Termination

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

6. Notification requirements

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

7. Opportunities to Object and Appeals

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

8. Effects of Suspension and Termination

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

ZZ. Best Practices

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

AAA. Payment Information

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

Instructions to Grant Recipients Pursuing Payments

FEMA reviews all grant payments and obligations to ensure allowability in accordance with [2 C.F.R. § 200.305](#). These measures ensure funds are disbursed appropriately while continuing to support and prioritize communities who rely on FEMA for assistance. Once a recipient submits a

payment request, FEMA will review the request. If FEMA approves a payment, recipients will be notified by FEMA GO and the payment will be delivered pursuant to the recipients SAM.gov financial information. If FEMA disapproves a payment, FEMA will inform the recipient.

Processing and Payment Timeline

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

Treasury-State agreements generally apply to "major federal assistance programs" that are governed by [31 C.F.R. part 205, subpart A](#) and are identified in the Treasury-State agreement. [31 C.F.R. §§ 205.2, 205.6](#). Where a federal assistance (grant) program is not governed by subpart A, payment and funds transfers from FEMA to the state are subject to [31 C.F.R. part 205, subpart B](#). Subpart B requires FEMA to "limit a funds transfer to a state to the minimum amounts needed by the state and must time the disbursement to be in accord with the actual, immediate cash requirements of the state in carrying out a federal assistance program or project. The timing and amount of funds transfers must be as close as is administratively feasible to a state's actual cash outlay for direct program costs and the proportionate share of any allowable indirect costs." [31 C.F.R. § 205.33\(a\)](#). Nearly all FEMA grants are not "major federal assistance programs." As a result, payments to states for those grants are subject to the "default" rules of [31 C.F.R. part 205, subpart B](#).

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

Submission Process

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

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

1. Grant ID / Award Number
2. Total amount requested for drawdown
3. Purpose of drawdown and timeframe covered (must be within the award performance period)

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

O. Immigration Conditions

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

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

10. Other Information

BBB. Period of Performance Extension

Extensions to the period of performance are allowed.

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

CCC. Other Information

a. *Environmental Planning and Historic Preservation Compliance*

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

b. *Procurement Integrity*

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

c. Financial Assistance Programs for Infrastructure

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

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

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

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

2. Waivers

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

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

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

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

3. Definitions

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

d. Mandatory Disclosures

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

e. Adaptive Support

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

f. Record Retention

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

g. Actions to Address Noncompliance

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

h. Audits

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

11. Appendix A: Vulnerability Assessment

I, [insert name], as [insert title] of [insert name of bus company], certify that a vulnerability assessment has been completed and a security evaluation preparedness plan has been developed or updated for my company within the last three years.

Signature

Date

12. Appendix B: Applicant Eligibility Criteria

List of Historically Eligible UASI Urban Areas

State	Urban Area
Arizona	Phoenix
	Tucson
California	Anaheim/Santa Ana
	Bakersfield
	Bay Area
	Fresno
	Los Angeles/Long Beach

State	Urban Area
	Oxnard
	Riverside
	Sacramento
	San Diego
Colorado	Denver
Connecticut	Bridgeport
	New Haven
	Hartford
District of Columbia/Maryland/Virginia	National Capital Region
Florida	Fort Lauderdale
	Jacksonville
	Miami
	Orlando
	Tampa
Georgia	Atlanta
Hawaii	Honolulu
Illinois	Chicago
Indiana	Indianapolis
Kentucky	Louisville
Kansas/Missouri	Kansas City
Louisiana	Baton Rouge
	New Orleans
Maryland	Baltimore
Massachusetts	Boston
Michigan	Detroit
Minnesota	Twin Cities
Missouri/Illinois	St. Louis
Nebraska	Omaha
Nevada	Las Vegas
New Jersey	Jersey City/Newark
New York	Albany
	Buffalo
	New York City
	Rochester
	Syracuse
North Carolina	Charlotte
Ohio	Cincinnati
	Cleveland
	Columbus
	Toledo
Oklahoma	Oklahoma City
	Tulsa

State	Urban Area
Oregon	Portland
Pennsylvania	Pittsburgh
	Philadelphia
Puerto Rico	San Juan
Rhode Island	Providence
Tennessee	Memphis
	Nashville
Texas	Austin
	Dallas/Fort Worth/Arlington
	El Paso
	Houston
	San Antonio
Utah	Salt Lake City
Virginia	Norfolk
	Richmond
Washington	Seattle
Wisconsin	Milwaukee

13. Appendix C: Allowable Costs

A. Planning

Relevant program funds may be used for the following types of planning activities:

1. Development and enhancement of system-wide security risk management plans that ensure the continuity of essential functions, to include cyber;
2. Development or further strengthening of continuity plans, response plans, station action plans, risk assessments, and asset-specific remediation plans;
3. Development or further strengthening of security assessments, including multi-agency and multi-jurisdictional partnerships and conferences to facilitate planning activities;
4. Hiring of full or part-time staff and contractors or consultants to assist with planning activities only to the extent that such expenses are for the allowable activities within the scope of the grant (not for the purpose of hiring public safety personnel); hiring of contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327;
5. Materials required to conduct planning activities;
6. 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;
7. Planning activities related to alert and warning capabilities; and
8. Other project planning activities with prior approval from FEMA.

B. Operational Activities

FEMA encourages applicants to develop innovative operational approaches to enhance the security of transportation systems. Examples include:

1. Establishing or improving emergency communication systems linking drivers and over-the-road buses to company operation centers, law enforcement agencies or emergency response personnel;
2. Acquiring and installing equipment or systems that collect, store or exchange passenger and/or driver information with established government databases for security purposes; and
3. Implementing and operating established methodologies for screening passengers, their carry-on baggage, and/or their checked baggage, for weapons and/or explosives.

DDD. Equipment and Capital Projects

a. *Equipment – Vehicle/Driver Security Enhancements*

Vehicle Security Enhancements focus on vehicle disabling and anti-theft devices, real-time bus inventory and inventory control, tracking, monitoring, alert, and warning capabilities, and locating technologies. Driver security enhancements focus on protection for the bus driver to prevent would-be terrorists from immobilizing the driver and/or hijacking the bus. Applicants are discouraged from submitting projects that propose the use of closed-circuit television (CCTV) alone as an on-board deterrent to terrorism. Rather, any cameras should have the capability and protocols in place for incident-based real-time monitoring. CCTV Systems that are primarily archival, and do not clearly specify the ability for live monitoring in the Investment Justifications will not be funded.

b. *Capital Projects – Facility Security Enhancements*

1. Projects related to physical security enhancements at bus stations, or operator-owned facilities including but not limited to lighting, security cameras, security screening equipment for people and baggage, and access control (e.g., fences, gates, barriers);
2. Projects related to cybersecurity of access control, sensors, security cameras, badge/ID readers, Industrial Control System (ICS)/Supervisory Control and Data Acquisition (SCADA) systems, process monitors and controls, etc. or passenger/vehicle/cargo security screening equipment support. Cybersecurity assessments are allowable; and
3. Full or Part-Time Staff or Contractors/Consultants. Full or part-time staff or contractors/consultants may be hired to support security enhancement-related activities. 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. Hiring of contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327.

Note: All Capital and Vehicle/Driver security enhancement projects that include cameras, video surveillance, or alarm systems MUST either be live monitored 24/7 or have the capability for real-time incident-based monitoring. CCTV Systems that are primarily archival and do not clearly specify the ability for live monitoring in the IJs will not be funded.

c. *Equipment Acquisition*

A comprehensive listing of allowable equipment categories and types is found in the Authorized Equipment List. These costs include:

1. Personal protection equipment;
2. Explosive device mitigation and remediation equipment;
3. Chemical, biological, radiological, nuclear, and explosive (CBRNE) operational search and rescue equipment, or logistical support equipment;
4. Interoperable emergency communications equipment;
5. Detection equipment;
6. Terrorism incident prevention equipment; and
7. Physical security enhancement equipment.

Recipients may purchase equipment not listed on the AEL, but only if they first seek and obtain prior approval from FEMA.

Additional information on controlled equipment is pending publication. Please visit FEMA's website for current and upcoming guidance.

Unless otherwise noted, equipment must be certified as meeting required regulatory and DHS-adopted standards to be eligible for purchase using these funds. Equipment must comply with the Occupational Safety and Health Act requirement for certification of electrical equipment by a nationally recognized testing laboratory and demonstrate compliance with relevant DHS-adopted standards through a supplier's declaration of conformity with appropriate supporting data and documentation per International Organization for Standardization/International Electro-technical Commission (ISO/IEC) 17050, Parts One and Two. Agencies must have all necessary certifications and licenses for the requested equipment, as appropriate, prior to the request.

In addition, recipients that are using Intercity Bus Security Grant Program (IBSGP) funds to support emergency communications equipment activities must comply with the [SAFECOM Guidance on Emergency Communications Grants](#), including provisions on technical standards that ensure and enhance interoperable communications. For more information about SAFECOM, see the [Preparedness Grants Manual](#).

Program funds may be used for projects that enhance the cybersecurity of: Access controls, sensors, security cameras, badge/ID readers, ICS/SCADA systems, process monitors and controls (such as firewalls, network segmentation, predictive security cloud, etc.); and passenger/vehicle/cargo security screening equipment (cybersecurity assessments are allowable).

When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in implementation of all or part of the [Framework for Improving Critical Infrastructure Cybersecurity, Version 1.1](#) (the "Framework") developed by the National Institute of Standards and Technology (NIST). The Framework gathers existing international standards and practices to help organizations understand, communicate, and manage their cyber risks. For organizations that do not know where to start with developing a cybersecurity program, the Framework provides initial guidance. For organizations with more advanced practices, the Framework offers a way to improve their programs, such as better communication with their leadership and

suppliers about management of cyber risks.

DHS's Enhanced Cybersecurity Services (ECS) program is an example of a resource that assists in protecting U.S.-based public and private entities and combines key elements of capabilities under the "Detect" and "Protect" functions to deliver an impactful solution relative to the outcomes of the Cybersecurity Framework.

Specifically, ECS offers intrusion prevention and analysis services that help U.S.-based companies and State, Local, Tribal and Territorial (SLTT) governments defend their computer systems against unauthorized access, exploitation, and data exfiltration. ECS works by sourcing timely, actionable cyber threat indicators from sensitive and classified Government Furnished Information (GFI). DHS then shares those indicators with accredited Commercial Service Providers (CSPs). Those CSPs in turn use the indicators to block certain types of malicious traffic from entering a company's networks. Groups interested in subscribing to ECS must contract directly with a CSP to receive services. Please visit <http://www.cisa.gov/enhanced-cybersecurity-services-ecs> for a current list of ECS CSP points of contact.

d. Capital (Construction) Projects Guidance

See the [Preparedness Grants Manual](#) for more information about IBSGP Program Capital (Construction) Projects Guidance.

EEE. Training and Awareness Campaigns

a. Training

Program funds may be used for the following training activities:

1. **Training Topics.** Priority topics include active shooter training, security training for employees, and public awareness/preparedness campaigns. For IBGSP, the IJ narrative for Training should include:
 - A course syllabus, curriculum, or topic plan identifying the proposed course material and contents; and
 - The total cost of the training course, the number of participants, and the cost per participant breakdown.
2. **Training Workshops.** Grant funds may be used to plan and conduct training workshops to include costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, travel, and training plan development. Recipients are strongly encouraged to use free public space/locations/facilities, whenever available, prior to the rental of space/locations/facilities. Training should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Any training or training gaps, including those for children and individuals with disabilities or other access and functional needs, should be identified in an After-Action Report/Improvement Plan (AAR/IP) and addressed in the training cycle.
3. **Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff or contractors/consultants may be hired to support training-related activities. Hiring of contractors/consultants must follow the applicable federal procurement requirements at 2

C.F.R. §§ 200.317-200.327. Reimbursement of these costs should conform with the policies of the state or local unit of government or the awarding agency, whichever is applicable. Such costs must be included within the funding allowed for program management personnel expenses, which must not exceed 10% of the total allocation. Dual compensation is unallowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government and from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities. 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.

4. **Overtime and Backfill Costs.** The entire amount of overtime costs, including payments related to backfilling personnel, that are the direct result of attendance at FEMA and approved training courses and programs are allowable. Reimbursement of these costs should follow the policies of the state or local u§(s) of government or the awarding agency, whichever is applicable. In no case is dual compensation allowable.
5. **Travel.** Domestic travel costs (e.g., airfare, mileage, per diem, and hotel) are allowable as expenses by employees who are on travel status for official business related, approved training, subject to the restrictions at 2 C.F.R. Part 200. International travel is not an allowable expense.
6. **Supplies.** Supplies, items that are expended or consumed during the course of the planning and conduct of the training projects (s) (e.g., gloves and non-sterile masks), are allowable expenses.
7. **Funds Used to Develop, Deliver, and Evaluate Training,** including costs related to administering the training, planning, scheduling, facilities, materials and supplies, reproduction of materials, and equipment are allowable expenses. Training should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Any training or training gaps, including those for children and individuals with disabilities or other access and functional needs, should be identified in the AAR/IP and addressed in the training cycle.
8. **Developing New Courses.** 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 instructional design. Information on FEMA-approved training can found at [First Responder Training System](#).
9. **Other Items.** These costs include the rental of space/locations for planning and conducting training, badges, etc. Recipients are encouraged to use free public space/locations, whenever available, prior to the rental of space/locations.

b. Awareness Campaigns

Program funds may be used for the development and implementation of awareness campaigns to raise public awareness of indicators of terrorism and terrorism-related crime and for associated efforts to increase the sharing of information with public and private sector partners, including nonprofit organizations. DHS currently sponsors or supports a number of awareness campaigns. Please review materials, strategies, and resources at <https://www.dhs.gov/dhs-campaigns> before

embarking on the development of an awareness campaign for local constituencies and stakeholders.

Note: DHS requires that all public and private sector partners wanting to implement and/or expand the DHS “If You See Something, Say Something®” campaign (“campaign”) using grant funds work directly with the DHS Office of Partnership and Engagement (OPE). This will help ensure that the awareness materials (e.g., videos, posters, trifolds, etc.) remain consistent with DHS’s messaging and strategy for the campaign and compliant with the initiative’s trademark, which is licensed to DHS by the New York Metropolitan Transportation Authority. Coordination with OPE, through the campaign’s office (seesay@hq.dhs.gov), must be facilitated by the FEMA HQ Preparedness Officer.

FFF. Exercises

Program funds may be used for the following exercise activities:

- 1. Funds Used to Design, Develop, Conduct and Evaluate an Exercise.** This includes costs related to planning, meeting space, and other meeting costs, facilitation costs, materials and supplies, travel, and documentation. Exercises afford organizations the opportunity to validate plans and procedures, evaluate capabilities, and assess progress toward meeting capability targets in a controlled, low risk setting. Any shortcoming or gap identified, including those for children and individuals with disabilities or other access and functional needs, should be identified in an effective corrective action program that includes development of improvement plans that are dynamic documents, with corrective actions continually monitored and implemented as part of improving preparedness through the exercise cycle.
- 2. Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff may be hired to support exercise-related activities. In order to be eligible for reimbursement, the costs for hiring staff must conform to the policies of the non-federal entity and federal statutes, where applicable. *See, e.g., 2 C.F.R. § 200.430(a).* The costs for hiring contractors or consultants must comply with the applicable federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327. The costs for hiring staff, consultants, or contractors to support exercise-related activities costs must be included within the funding allowed for program management personnel expenses, which must not exceed 10% of the total allocation. Dual compensation is never allowable, meaning, in other words, that an employee of a unit of government may not receive compensation from their unit or agency of government and from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though their work may benefit both entities. 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.
- 3. Overtime and Backfill Costs.** The entire amount of overtime costs, including payments related to backfilling personnel, which are the direct result of time spent on the design, development and conduct of exercises are allowable expenses. These costs are allowed only to the extent the payment for such services is in accordance with the policies of the state or unit§ of local government and has the approval of the state or the awarding agency, whichever is applicable. Dual compensation is never allowable.

4. **Travel.** Domestic travel costs are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of exercise project(s), subject to the restrictions at 2 C.F.R. Part 200. International travel is not an allowable expense.
5. **Supplies.** Supplies are items that are expended or consumed during the course of the planning and conduct of the exercise project(s) (e.g., gloves, non-sterile masks, and disposable protective equipment).
6. **Other Items.** These costs include the rental of space/locations for exercise planning and executing, rental of equipment, etc. Recipients are encouraged to use free public space/locations/facilities, whenever available, prior to the rental of space/locations/facilities. These also include costs that may be associated with inclusive practices and the provision of reasonable accommodations and modifications to provide full access for children and adults with disabilities.

GGG. Construction and Renovation

Construction and renovation costs for modifying terminals, garages, and facilities, including terminals and other over-the-road bus facilities owned by state or local governments, to enhance their security are allowed under this program. All proposed construction and renovation activities must undergo an 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 more information, please reference the [Preparedness Grants Manual](#).

HHH. Backfill, Overtime, and Hiring

Backfill, overtime, and hiring costs are allowed under this program only as described in this NOFO.

III. Travel

Domestic travel costs are allowed under this program as described in this NOFO. International travel is not an allowable cost under this program unless approved in advance by DHS/FEMA.

JJJ. Maintenance and Sustainment

Maintenance and sustainment related costs are allowed under this program only as described in this NOFO and the [Preparedness Grants Manual](#).

KKK. 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](#) section 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 they use 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 in 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 NOFO, and 2 C.F.R. Part 200.

a. Grant Writers

Grant writing contractors may assist the applicant in a variety of ways, including preparing, writing, and finalizing grant application materials and assisting the applicant with handling online application and submission requirements in FEMA GO. 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 the 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 the applicant for their 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, the applicant 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 Detail Worksheet for the 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 canceled 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 or the SA of the recipient. Further, an application must be officially submitted by 1) a ***current employee, personnel, official, staff, or leadership*** of the non-federal entity; and 2) ***duly authorized to apply*** for an award on behalf of the non-federal entity at the time of application.

b. Grant Managers

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

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

c. Restrictions Regarding Grant Writers and Grant Managers

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

LLL. Excess Funds

After completing the initial project proposed in the recipient's application, some recipients may have unexpended funds remaining in their budgets. These excess funds may result from any combination of under-budget acquisition activities or competitive procurement processes. In such cases, excess funds must be returned to FEMA upon project completion. Please also see Section C of this NOFO regarding cost-share requirements, including the implications if the project costs are less than what was applied for.

MMM. Other Allowable Costs Bonds

Financial markets are not always predictable, and commercial suppliers are not always reliable; but there are options to provide resource contingencies to support an IBSGP award.

Prepayment Bond

Prepayment Bonds provide a measure of economic security for an organization that is going to advance funds to a vendor(s). The prepayment bond generally may be obtained through the vendor or bank. The prepayment bond protects funds in the event a vendor fails to perform (e.g., not finishing/delivering contracted service/equipment, or going out of business). Prepayment bonds are chargeable to an award.

Encouraged Prepayment Bond

Recipients are strongly recommended, but not required, to obtain a prepayment bond for awarded acquisition activities that exceed the Simplified Acquisition Threshold (SAT) (currently \$250,000, but the applicable dollar threshold will be the SAT amount in place at the time of procurement) when recipients are contractually required to advance a down payment and when such advances contain no federal funds (only local funds).

Required Prepayment Bond

Per 2 C.F.R. § 200.304(b), recipients are required to obtain a prepayment bond for awarded acquisition activities that exceed the SAT; a prepayment bond is required when recipients are contractually required to advance a down payment and when such advances contain only federal funds or a combination of federal and local funds.

Fidelity Bond

Reasonable costs of fidelity bonds (or like insurance as provided for by applicable state or tribal laws) covering the maximum amount of IBSGP funds the officer, official, or employee handles at any given time for all personnel who disburse or approve disbursement of IBSGP funds may be allowable if required by the terms and conditions of the award or if generally required by the tribe in its generally operations. If a fidelity bond is required by a recipient in its general operations, those costs must be charged as indirect costs. See 2 C.F.R. § 200.427.