

Notice of Funding Opportunity

**Application due: July 24, 2026**









# Fiscal Year 2026 Homeland Security Grant Program

Assistance Listing Number: 97.067

Funding Opportunity Number: DHS-26-GPD-067-00-98

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# Before you begin

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

## **SAM.gov registration (this can take several weeks)**

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

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

## **Grants.gov registration (this can take several days)**

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

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

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



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



# Step 1: Review the Opportunity

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# Basic Information

## A. Award Facts

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

**Assistance Listing Number:** 97.067

**Notice of Funding Opportunity (NOFO) Title:**

Fiscal Year 2026 Homeland Security Grant Program (HSGP)

- State Homeland Security Grant Program (SHSP)
- Urban Area Security Initiative (UASI)
- Operation Stonegarden (OPSG)

**Funding Opportunity Number:** DHS-26-GPD-067-00-98

**Announcement Type:** Initial

**Expected Award Range:**

- SHSP: \$394,250,000
- UASI: \$584,250,000
- OPSG: \$85,500,000

**Expected Total Funding:** \$1,064,000,000

See [Appendix 1: HSGP Allocations](#) for the FY 2026 HSGP funding allocation tables.

**Anticipated Number of Awards:** 56 awards

## B. Executive Summary

HSGP strengthens the nation's capacity to prevent, prepare for, protect against, and respond to acts of terrorism and other catastrophic events through the following three components:

- **SHSP:** Supports the implementation of risk-driven, capabilities-based State Homeland Security Strategies to address capability targets.
- **UASI:** Focuses on high-risk urban area efforts to address their unique security needs.
- **OPSG:** Enhances cooperation and coordination among state, local, Tribal Nations, territorial and federal law enforcement agencies to jointly enhance security along the United States land and water borders.



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

## Key Dates

Projected Application Start Date: June 24, 2026

Projected Application End Date: July 24, 2026

Anticipated Funding Selection Date:  
No later than September 30, 2026

Anticipated Award Date:  
No later than September 30, 2026

Projected Period of Performance Start Date:  
September 01, 2026

Projected Period of Performance End Date:  
August 31, 2029

Budget Period:  
September 01, 2026 – August 31, 2029

# Eligibility

## A. Eligible Entities

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

### Applicant Eligibility

The State Administrative Agency (SAA) is the only entity eligible to submit HSGP applications to DHS/FEMA. HSGP funds are provided to SAAs, which manage and distribute the funds within their respective states, Tribal Nations or territories. SAAs issue subawards to local and tribal governments and other eligible organizations ensuring that resources reach areas that need them to enhance security and disaster response.

For this funding opportunity, the term "state" includes all U.S. states, the District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. Tribal governments are not eligible to apply directly for HSGP funding but may receive funding through their state's SAA.

### Subapplicant Eligibility

SAAs distribute HSGP funds through subawards to other state, local, or tribal organizations. These organizations, called subrecipients, use the funds to improve local and regional security efforts.

#### 1. Subrecipient Eligibility

Under HSGP, FEMA provides funds to each state's SAA. The SAA distributes these funds to other state or local organizations, such as city agencies or county departments, as well as tribal governments. These distributed funds are called subawards, and the organizations receiving them are referred to as subrecipients.

- **SHSP:** All U.S. states and territories listed above are eligible. Tribal governments must work through their state's SAA.
- **UASI:** FEMA identifies high-risk urban areas based on terrorism risk. SAAs distribute subawards to these designated urban areas. See [Appendix 1: HSGP Allocations](#) for the complete list.
- **OPSG:** Eligible subrecipients include county-level or equivalent governments and federally recognized tribal governments in states bordering Canada or Mexico, or those with international water borders. Applicants must have active U.S. Border Patrol operations coordinated with a U.S. Customs and Border Protection sector office to qualify.

#### 2. Reducing Subapplicant Burden

For FY 2026, each SAA is strongly encouraged to re-evaluate its process for collecting and evaluating subaward applications. FEMA encourages each SAA to minimize the type and quantity of information that it collects as part of the subaward application process, in order to decrease the associated overall financial and time burden.

## B. Project Type Eligibility

### Allowable Project Types

Allowable costs for SHSP, UASI, and OPSG generally fall into five main categories: planning, organization, equipment, training, and exercises (POETE). All projects funded under SHSP and UASI must demonstrate a clear connection to building capabilities that prevent, prepare for, protect against, or respond to acts of terrorism.

Please see [Appendix 2: Allowable Costs](#) for more information on allowable costs. If there are questions about specific experiences, contact your FEMA Preparedness Officer.

### Unallowable Project Types

Per FEMA policy, the purchase of weapons and weapons accessories, including ammunition, is not allowed with HSGP funds. Grant funds may not be used for the purchase of the following equipment: firearms; ammunition; grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons installed. Unauthorized exercise-related costs include:

- Reimbursement for the maintenance or wear and tear costs of general use vehicles (e.g., construction vehicles), medical supplies, and emergency response apparatus (e.g., fire trucks, ambulances); and
- Equipment that is purchased for permanent installation and/or use, beyond the scope of the conclusion of the training or exercise (e.g., electronic messaging sign).

HSGP funds may not be used to support the hiring of sworn public safety officers for purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities (6 U.S.C. § 609(b)(1)(A)).

As directed by Section 2008(b)(2) of the *Homeland Security Act of 2002* (codified as amended at 6 U.S.C. § 609(b)(2)), all personnel and personnel-related costs, including those of intelligence analysts and operational overtime, are allowed up to 50% of HSGP funding without time limitation placed on the period of time that such personnel can serve. FEMA may provide a waiver at the request of the recipient to allow personnel expenses to exceed 50% of the amount awarded.

Applicants should refer to [IB 421b](#) and [IB 563](#) or contact their FEMA Headquarters (HQ) Preparedness Officer for guidance and clarification.

See [Program-Specific Unallowable Costs](#) and [Ineligible Projects](#) for more information on unallowable project types.

OPSG funds may not be used for the following:

- Evidence collection, arrest processing, prosecution, and Traffic/DUI checkpoints, such as evidence documentation cameras, fingerprinting supplies, alcohol breathalyzers, portable work lights, traffic barricades, and similar law enforcement expenses;
- Staffing (other than overtime) and general information technology computing equipment and hardware, such as personal computers, faxes, copy machines, and modems;
- Hiring full-time or permanent sworn public safety officers;

- Supplanting of inherent routine patrols and law enforcement operations or activities not directly related to providing enhanced coordination between local and federal law enforcement agencies;
- Construction and/or renovation costs; or
- Exercise expenses.

## C. Requirements for Personnel, Partners, and Other Parties

An application submitted by an otherwise eligible non-federal entity (i.e., the applicant) may be deemed ineligible when the person that submitted the application is not:

1. *A current employee, official, or leader* of the recipient organization; and
2. *Authorized to apply* for the award on behalf of the entity at the time of submission.

Additionally, the Authorized Organization Representative (AOR) must:

1. Be a current authorized employee, official, or leader of the recipient organization.
2. Use a unique email address associated with the recipient organization at the time of application and upon any change in assignment during the period of performance.

Consultants or contractors are not permitted to serve as the AOR of the recipient organization. For more information on the roles and responsibilities of the AOR, refer to FEMA's guidance on [Roles and Permissions](#).

Subapplicants should not have foreign nationals or noncitizens included. If a subapplicant has foreign nationals, they must be properly vetted and must adhere to all government statutes, policies, and procedures including “staff American, stay in America” and security requirements.

Subapplicants/subrecipients must submit short bios and resumes. This should include the type of entity, organizational leadership, and board members along with both the names and addresses of the individuals. Resumes are subject to approval.

## D. Maximum Number of Applications

The maximum number of applications that can be submitted is:

One per SAA.

## E. Additional Restrictions

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

Under HSGP, there are specific funding guidelines/requirements for allocating funds:

### a. *Pass-Through Requirements*

For more information on funding restrictions, refer to the [Preparedness Grants Manual](#).

### *b. Funding Withholding for Election Security NPA Requirements*

In addition to the minimum allocation requirements for the FY 2026 National Priority Areas (NPAs) and Law Enforcement Terrorism Prevention Activities (LETPA), recipients must comply with the FY 2026 Election Security NPA requirements as a condition of full drawdown of eligible HSGP funds (including SHSP, UASI, and OPSG).

For each state and UASI, FEMA will withhold from drawdown an amount equal to 20% of the recipient's total HSGP award (SHSP, UASI, and OPSG) until the recipient submits proof of compliance with the FY 2026 Election Security NPA requirements, and such proof is verified/confirmed by the Department.

Upon verification/confirmation, the Department will notify the recipient and release the withheld portion(s) for drawdown in accordance with applicable grant administration requirements.

## **F. References to Other Eligibility Factors**

Please see the following references provided below:

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

## **G. Cost Share Requirements**

There is no cost share requirement.

## **H. Cost Share Description, Type, and Restrictions**

Not applicable.

## **I. Cost Share Example**

Not applicable.

## **J. Required Information for Verifying Cost Share**

Not applicable.

Maintenance of Effort

Not applicable.

# **Program Description**

## A. Program Purpose

HSGP includes three key grant programs designed to enhance the capabilities of state, local, tribal, and territorial governments, to prevent, protect against, and respond to terrorist attacks. These programs are part of a comprehensive set of measures authorized by Congress and implemented by the Department of Homeland Security (DHS) to strengthen the nation's communities against potential terrorist threats.

In FY 2026, HSGP continues to include three grant programs:

- SHSP: Supports the implementation of risk-driven, capabilities-based State Homeland Security Strategies to address capability targets.
- UASI: Focuses on high-risk urban area efforts to address their unique security needs.
- OPSG: Enhances cooperation and coordination among state, local, tribal, territorial, and federal law enforcement agencies to jointly enhance security along the United States land and water borders.

These programs collectively aim to strengthen the nation's ability to prevent, prepare for, protect against, and respond to acts of terrorism and other threats.

Since its inception in 2003, DHS has invested more than \$65 billion to enhance the nation's preparedness through programs like HSGP. HSGP addresses evolving threats such as cybersecurity vulnerabilities and the protection of soft targets and crowded places. It represents a comprehensive approach to national security, fostering collaboration across all levels of government and within communities to build a safer, more resilient nation. Through planning, training, equipment procurement, and exercises, the program ensures jurisdictions are prepared for a wide range of risks.

In recent years:

- Funding priorities have evolved to include cybersecurity, election security, and countering emerging national security threats.
- Key accomplishments include the development of interoperable communication systems, emergency response training, and investment in physical and cybersecurity measures.
- The program emphasizes strategic investments to address identified capability gaps, requiring alignment with Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR).

This support equips various jurisdictions with the necessary tools and resources to effectively manage and mitigate a wide range of threats and hazards, aligning with FEMA's goal of building a secure and resilient nation.

## B. Goals and Objectives

As HSGP is comprised of three grant programs, this section is divided into SHSP and UASI (addressed together) and OPSG, each with its own focus and goals. SHSP and UASI aim to strengthen the ability of states and urban areas to prevent, prepare for, protect against, and respond to acts of terrorism and other hazards. OPSG remains unique to border security, and focuses on improving cooperation between local,

tribal, state, and federal law enforcement to secure America's international borders. These programs work together to build a secure and resilient nation, giving communities the tools and resources they need to handle various threats and emergencies effectively.

## SHSP and UASI

### 1. SHSP and UASI Goals

The goal of SHSP is to support statewide and state, local, tribal, and territorial (SLTT) governments in building, enhancing, and sustaining the capabilities needed to prevent, prepare for, protect against, and respond to acts of terrorism. SHSP funding is intended to help SLTT agencies address capability gaps identified through the THIRA/SPR process, as well as prioritize resources toward high-impact security focus areas, known as NPAs.

The goal for the UASI program is to enhance the security and resilience of high-risk urban areas by building, sustaining, and improving capabilities to prevent, prepare for, protect against, and respond to acts of terrorism. This goal focuses on enabling urban areas to address identified security gaps, increase interagency coordination, and strengthen critical infrastructure protection to reduce vulnerabilities in locations facing heightened risks.

Under HSGP, together SHSP and UASI aim to build a cohesive and collaborative approach to homeland security by promoting national preparedness and resilience.

### 2. SHSP and UASI Objectives

SHSP and UASI provide resources that support eligible SLTT governments in meeting the following objectives:

- Build and sustain core capabilities, including LETPA and the NPAs (see priorities below).
- Address capability gaps identified in their THIRA and SPR process.
- Implement a comprehensive and coordinated approach to address enduring security needs of communities that include planning, training and awareness campaigns, equipment and capital projects, and exercises.

### 3. SHSP and UASI Funding Priorities and Requirements

HSGP establishes specific funding requirements to ensure resources are allocated effectively and address critical national priorities.

#### a) Law Enforcement Terrorism Prevention Activities (LETPA):

- Description: LETPA are initiatives funded through HSGP aimed at enhancing law enforcement's ability to prevent terrorist attacks. These activities focus on building and sustaining capabilities in areas such as intelligence analysis, information sharing, threat recognition, and terrorist interdiction.
- Allocation Requirement: At least 35% of each state/territory SHSP/UASI (where applicable) allocation must be allocated to LETPA activities.
- Flexibility: LETPA funds can come from SHSP, UASI, or both to meet this requirement.
- Project Alignment: LETPA funds can be applied to projects across the NPAs or other

investments that meet LETPA criteria.

- Additional Guidance: For detailed guidance on allowable LETPA expenditures and requirements, refer to FEMA's [Preparedness Grants Manual](#) and [Information Bulletin 485 and Information Bulletin 497](#).

- b) National Priority Areas (NPAs): FY 2026 HSGP aligns with the Administration's priorities by directing resources toward the most urgent threats facing the nation. Through the SHSP and UASI, HSGP 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 following are the required NPAs for FY 2026:

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 support 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 State immigration law.

These NPAs are rooted in the core mission areas of the NPG—prevention, protection, mitigation, and response, 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.

- c) Allocation Requirement:  
Recipients must allocate at least 30% of their SHSP and UASI funds to the five NPAs. Funds can be applied to projects across the five NPAs and can be used to meet LETPA criteria. By meticulously outlining how each investment and project meets LETPA and NPA requirements within the Investment Justifications (IJ), applicants can enhance the effectiveness and compliance of their funding proposals.
- d) Minimum Spend:
- Enhancing Election Security requires at least 3% of total SHSP and UASI funds.
  - Supporting Border Crisis Response and Enforcement requires at least 10% of total SHSP and UASI funds.

- The remaining 17% can be allocated across all NPAs.

**Failure to meet NPA spending requirements will result in a hold on affected funds until compliance issues are resolved.**

Priority Areas	Description	Minimum Allocation Requirement
Enhancing the Protection of Soft Targets/Crowded Places	Improving security at locations accessible to the public and vulnerable to attacks.	No minimum allocation
Supporting Homeland Security Task Forces and Fusion Centers	Promoting coordination of activities and critical information sharing and analysis to prevent and respond to threats.	No minimum allocation, but applicants must include at least one project in support of the state or territory's designated fusion center.
Enhancing Cybersecurity	Strengthening the protection of computer systems and networks against cyber threats.	No minimum allocation
Enhancing Election Security	Ensuring the integrity and security of voting systems.	At least 3% of the total SHSP and UASI allocation must be dedicated to this area.
Supporting Border Crisis Response and Enforcement	Supporting collaboration between state and local law enforcement and U.S. Immigration and Customs Enforcement (ICE) through the 287(g) program to identify and remove individuals who pose a threat to public safety and national security.	At least 10% of the total SHSP and UASI allocation must be dedicated to this area.

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. Additionally, and consistent with Section 4 of National Security Presidential Memorandum-7 (NSPM-7), domestic terrorism has been designated as a priority within applicable homeland security grant programs. States are encouraged to review the [Strategic Framework for Countering Terrorism and Targeted Violence](#) when developing

investments.

#### 4. NPA Investments: SHSP and UASI

- a) Enhancing and Protection of Soft Targets/Crowded Places (no minimum percentage)  
Soft targets and crowded places, like parks, shopping centers, transportation hubs, and event venues, are increasingly appealing to terrorists because of their accessibility and the large gatherings. These areas often lack strict security measures, making them vulnerable. To address this, public and private sectors must collaborate to strengthen the security of locations such as transportation centers, restaurants, polling places, and similar facilities. Personnel responding to incidents at these sites should also be trained in key operational systems, such as the Incident Command System (ICS), to ensure effective on-scene incident management.

In addition, the malicious use of unmanned aircraft systems (i.e., drones) poses safety and security risks to soft targets and crowded places. Detecting drones is an allowable use of funds under the HSGP in accordance with [Executive Order 14305, Restoring American Airspace Sovereignty](#), which allows the purchase of unmanned aircraft systems (UAS) or equipment or services for the detection, tracking, or identification of drones and drone signals, and FEMA Information Bulletin 530. Before purchasing and deploying these systems, as outlined in the Domestic Counter-UAS National Action Plan, recipients must:

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

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

#### Additional Resources

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

- b) Supporting Homeland Security Task Forces and Fusion Centers (no minimum percentage)  
This priority supports the Administration's direction under Executive Order 14159, Protecting

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

Activities under this NPA also enhance broader national efforts in:

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

Allowable Costs:

Applicants may use grant funds for:

- Establishing or enhancing multi-agency HSTFS, including operational coordination centers
- Enhancing capabilities and integration with local fusion centers;
- Procuring technology or equipment to support surveillance, communications, and data analysis;
- Developing 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; and
- Community engagement efforts to foster trust and encourage threat reporting.

Fusion Center Requirements: Although there is no minimum spending requirement for this NPA, applicants must include at least one project in support of the state or territory's designated fusion center. Applicants must clearly justify how their project will enhance information sharing, collaboration, and a culture of national preparedness. DHS/FEMA will evaluate these investments based on their effectiveness and alignment with program objectives. Please see the [Preparedness Grants Manual](#) for more information on fusion center performance measures.

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

c) Cybersecurity (no minimum percentage)

In today's interconnected world, increased connectivity brings greater risks, including the potential for adversaries and terrorists to exploit cyber vulnerabilities and disrupt critical systems. While not mandatory, applicants are encouraged to submit proposals for ongoing or

high-priority cybersecurity projects. DHS/FEMA will evaluate these investments based on their effectiveness.

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

d) Election Security (3% minimum allocation)

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 Protection the Integrity of American Elections](#), into the Election Security NPA, HSGP recipients can ensure that their efforts contribute to a secure, transparent, and resilient electoral process, thereby reinforcing public trust and the integrity of democratic institutions.

To address these priorities, each state and high-risk urban area must make at least one investment that supports physical and/or cyber election security. Proposed investments must meet or exceed the FY 2026 national priority percentage for election security (minimum 3%) and will be evaluated by DHS/FEMA for effectiveness and alignment with program goals.

To strengthen the integrity of U.S. elections, each state and high-risk urban area election jurisdiction must:

- Submit a transition plan: Submit a plan for transitioning from electronic voting systems that utilize bar codes or QR codes to count votes to equipment that accepts hand-marked paper ballots. The plan, for all jurisdictions currently using such systems, must include a timeline and, if necessary, a funding request to eliminate ballot marking devices and utilize hand-marked paper ballots.
- Post-election manual audit: Demonstrate proof of compliance with a post-election 5% manual audit, conducted according to the guidelines established by the Secretary, to ensure that electronic voting systems accurately count votes.
- Voter/ballot reconciliation: Ensure that each election jurisdiction reconciles the number of voters who voted in each federal election to the number of ballots cast, using the methodology established by the Secretary.
- Voter roll citizenship verification: Utilize the U.S. Citizenship and Immigration Services' Systematic Alien Verification for Entitlements (SAVE) system to verify the citizenship of all

individuals in the state voter registration database within 120 days of accepting the grant award\*. To mitigate operational vulnerabilities exploitable by terrorist or foreign actors and advance HSGP counterterrorism objectives, the State's chief election official must take timely corrective action, consistent with applicable law, to remove verified non-U.S. citizens from the database.

- Election worker citizenship verification: Utilize the SAVE system, or another authorized government system, to verify U.S. citizenship for any person working at a polling place in any capacity, or operating any election system in the jurisdiction, including temporary agency workers and vendors who work on or with election systems. To prevent sabotage, infiltration, or foreign interference, the State's chief election official must ensure verified non-U.S. citizens are prohibited from operating election systems or working at polling places, consistent with applicable law, thereby hardening critical infrastructure under HSGP.

### 3% Allocation vs. 20% Holdback — Distinct Requirements

The 3% minimum allocation and the 20% holdback are separate requirements and do not offset one another.

- The 3% minimum allocation is a *spending* requirement: each state and high-risk urban area must dedicate at least 3% of its SHSP and UASI award to eligible election security investments.
- The 20% holdback is a separate *drawdown* condition: For each state and UASI, FEMA will withhold from drawdown an amount equal to 20% of the recipient's total HSGP award (SHSP, UASI, and OPSG) until the recipient submits proof of compliance with the FY 2026 Election Security NPA requirements and the Department verifies/confirms that proof. Meeting the 3% allocation does not, by itself, release the 20% holdback, and the holdback applies to funds beyond the 3% set-aside.

Upon verification/confirmation of compliance, FEMA will notify the recipient and release the withheld portion(s) for drawdown in accordance with applicable grant administration requirements.

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

- e) Supporting Border Crisis Response and Enforcement (10% minimum allocation)  
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.

At least one investment must support efforts under this NPA. Applicants must allocate at least 10% of total SHSP and UASI funds to this area. All investments will be reviewed by DHS/FEMA to ensure they are effective, lawful, and aligned with program goals. The SAA must coordinate with ICE on all projects and related matters. Additional guidance and information on the 287(g) program are available through the [ICE 287\(g\) program website](#).

f) *Other FY 2026 SHSP and UASI Funding Priorities*

There are several enduring security needs that crosscut the homeland security enterprise to which recipients should consider allocating funding across core capability gaps and national priorities. The following are enduring needs that help recipients implement a comprehensive approach to securing communities:

- Effective planning;<sup>[1]</sup>
- Training and awareness campaigns;
- Equipment and capital projects; and
- Exercises.

The table below breaks down the FY 2026 SHSP and UASI priorities showing the core capabilities enhanced and lifelines supported, as well as examples of eligible project types for each area. More information on allowable investments can be found in [Appendix 2: Allowable Costs](#) and in the [Preparedness Grants Manual](#).

DHS/FEMA expects that national priorities will continue to be included in future years, evolving as threats change and capability gaps are addressed. Applicants are strongly encouraged to start planning now to sustain existing capabilities using funding sources other than DHS preparedness grants.

Projects listed in the table below may be useful in preparing for disasters unrelated to terrorism, if they also support the primary goals of preventing, preparing for, protecting against, or responding to acts of terrorism.

Example Project Types: *All priorities in this table concern Safety and Security Lifelines.*

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<sup>1</sup> Including assessment of critical infrastructure system vulnerabilities and plans to reduce consequences of disruptions, using the Infrastructure Resilience Planning Framework and Regional Resiliency Assessment Methodology produced by the Cybersecurity and Infrastructure Security Agency

Priority Areas	Core Capabilities	Example Project Types
<b>National Priorities</b>		
Enhancing the Protection of Soft Targets/Crowded Places (Securing Public Gathering Locations)	<ul style="list-style-type: none"> <li>▪ Operational coordination</li> <li>▪ Public information and warning</li> <li>▪ Intelligence and information sharing</li> <li>▪ Interdiction and disruption</li> <li>▪ Screening, search, and detection</li> <li>▪ Access control and identity verification</li> <li>▪ Physical protective measures</li> <li>▪ Risk management for protection programs and activities</li> </ul>	<ul style="list-style-type: none"> <li>▪ Operational overtime. For more information on operational overtime, see <a href="#">Appendix 2</a> of this NOFO.</li> <li>▪ Physical security enhancements               <ul style="list-style-type: none"> <li>○ Security cameras (closed-circuit television [CCTV])</li> <li>○ Security screening equipment for people and baggage</li> <li>○ Lighting</li> <li>○ Access controls</li> <li>○ Fencing, gates, barriers, etc.</li> </ul> </li> <li>▪ UAS and detection technologies</li> </ul>
Enhancing Cybersecurity	<ul style="list-style-type: none"> <li>▪ Cybersecurity</li> <li>▪ Intelligence and information sharing</li> <li>▪ Planning</li> <li>▪ Public information and warning</li> <li>▪ Operational coordination</li> <li>▪ Screening, search, and detection</li> <li>▪ Access control and identity verification</li> <li>▪ Supply chain integrity and security</li> <li>▪ Risk management for protection programs and activities</li> <li>▪ Long-term vulnerability reduction</li> <li>▪ Situational assessment</li> <li>▪ Infrastructure systems</li> <li>▪ Operational communications</li> </ul>	<ul style="list-style-type: none"> <li>▪ Cybersecurity risk assessments</li> <li>▪ Migrating online services to the “.gov” internet domain</li> <li>▪ Projects that address vulnerabilities identified in cybersecurity risk assessments               <ul style="list-style-type: none"> <li>○ Improving cybersecurity of critical infrastructure to meet minimum levels identified by the <a href="#">Cybersecurity and Infrastructure Security Agency</a> and the <a href="#">National Institute of Standards and Technology Cybersecurity Framework (Version 1.1)</a></li> <li>○ Adoption of cybersecurity performance goals (<a href="#">CISA's Cross-Sector Cybersecurity Performance Goals</a>)</li> </ul> </li> <li>▪ Cybersecurity training, planning, and exercises</li> </ul>
Supporting Homeland Security Task Forces	<ul style="list-style-type: none"> <li>▪ Intelligence and information sharing</li> </ul>	<ul style="list-style-type: none"> <li>▪ Establishing or enhancing multi-agency Homeland Security Task Forces</li> </ul>

Priority Areas	Core Capabilities	Example Project Types
and Fusion Centers	<ul style="list-style-type: none"> <li>▪ Interdiction and disruption</li> <li>▪ Public information and warning</li> <li>▪ Operational coordination</li> <li>▪ Risk management for protection programs and activities</li> </ul>	<p>(HSTFs), including operational coordination centers</p> <ul style="list-style-type: none"> <li>▪ Enhancing capabilities and integration with local fusion centers</li> <li>▪ Procuring technology or equipment to support surveillance, communications, and data analysis</li> <li>▪ Developing standard operating procedures for information sharing, joint operations, and immigration enforcement coordination</li> <li>▪ Personnel training, credentialing, and certification to improve interoperability and mission alignment</li> <li>▪ Intelligence analysis, reporting, and suspicious activity monitoring</li> <li>▪ Exercises and simulations focused on joint operations, intelligence sharing, or interdiction/disruption of criminal or smuggling networks</li> <li>▪ Community engagement efforts to foster trust and encourage threat reporting</li> <li>▪ Information sharing with all DHS components; fusion centers; other operational, investigative, and analytic entities; and other federal law enforcement and intelligence entities</li> <li>▪ Cooperating with DHS and other entities in intelligence, threat recognition, assessment, analysis, and mitigation</li> <li>▪ Identifying, assessing, and reporting of threats of violence</li> <li>▪ Intelligence analysis training, planning, and exercises</li> <li>▪ Coordinating the intake, triage, analysis, and reporting of tips/ leads and suspicious activity, to include coordination with the <u>Nationwide Suspicious Activity Reporting (SAR) Initiative (NSI)</u></li> </ul>

Priority Areas	Core Capabilities	Example Project Types
Enhancing Election Security	<ul style="list-style-type: none"> <li>▪ Cybersecurity</li> <li>▪ Intelligence and information sharing</li> <li>▪ Planning</li> <li>▪ Long-term vulnerability reduction</li> <li>▪ Situational assessment</li> <li>▪ Infrastructure systems</li> <li>▪ Operational coordination</li> <li>▪ Community resilience</li> </ul>	<ul style="list-style-type: none"> <li>▪ Physical security planning and exercise support</li> <li>▪ Physical/site security measures (e.g., locks, shatter-proof glass, alarms, access controls)</li> <li>▪ General election security navigator support</li> <li>▪ Cyber and general election security navigator support</li> <li>▪ Cybersecurity risk assessments, training, and planning</li> <li>▪ Projects that address vulnerabilities identified in cybersecurity risk assessments</li> <li>▪ Iterative backups, encrypted backups, network segmentation, monitoring/scanning software, and endpoint protection</li> <li>▪ Distributed Denial of Service (DDoS) protection</li> <li>▪ Migrating online services to the “.gov” internet domain</li> <li>▪ Public awareness and preparedness campaigns addressing election security and integrity measures</li> <li>▪ Long-term vulnerability reduction and community resilience initiatives</li> </ul>
Supporting Border Crisis Response and Enforcement	<ul style="list-style-type: none"> <li>▪ Training and awareness</li> <li>▪ Community resilience</li> <li>▪ Operational coordination</li> <li>▪ Risk management for protection programs and activities</li> </ul>	<ul style="list-style-type: none"> <li>▪ Staffing support to expand 287(g) screening operations within correctional facilities</li> <li>▪ Operational overtime costs directly tied to 287(g) screening, processing, and enforcement activities</li> <li>▪ Training programs for state and local law enforcement officers in immigration law, civil rights and civil liberties protections, and 287(g) procedures</li> <li>▪ Developing or enhancing information-sharing platforms between ICE and</li> </ul>

Priority Areas	Core Capabilities	Example Project Types
		<p>local agencies</p> <ul style="list-style-type: none"> <li>▪ Procuring screening, detection, and communications technology to support immigration enforcement activities</li> <li>▪ Establishing secure and dedicated communication networks with ICE Field Offices</li> <li>▪ Conducting joint training exercises with ICE and local law enforcement to test operational coordination</li> <li>▪ Supporting facilities upgrades, such as creating dedicated interview rooms and secure processing spaces</li> <li>▪ Community engagement and public briefings to promote transparency and understanding of 287(g) operations and protections</li> </ul>
<b>Enduring Needs</b>		
Planning	<ul style="list-style-type: none"> <li>▪ Planning</li> <li>▪ Risk management for protection programs and activities</li> <li>▪ Risk and disaster resilience assessment</li> <li>▪ Threats and hazards identification</li> <li>▪ Operational coordination</li> <li>▪ Community resilience</li> </ul>	<ul style="list-style-type: none"> <li>▪ Development of: <ul style="list-style-type: none"> <li>○ Security Risk Management Plans</li> <li>○ Threat Mitigation Plans</li> <li>○ Continuity of Operations Plans</li> <li>○ Response Plans</li> <li>○ Vulnerability Assessments</li> </ul> </li> <li>▪ Efforts to strengthen governance integration between/among regional partners</li> <li>▪ Joint training and planning with DHS officials and other entities designated by DHS</li> <li>▪ Cybersecurity training and planning</li> </ul>
Training and Awareness	<ul style="list-style-type: none"> <li>▪ Long-term vulnerability reduction</li> <li>▪ Public information and warning</li> <li>▪ Operational coordination</li> <li>▪ Situational assessment</li> <li>▪ Community resilience</li> </ul>	<ul style="list-style-type: none"> <li>▪ Active shooter training</li> <li>▪ Intelligence analyst training</li> <li>▪ SAR and terrorism indicators/behaviors training</li> <li>▪ Security training for employees</li> <li>▪ Public awareness/preparedness campaigns</li> <li>▪ Cybersecurity training and planning</li> </ul>

Priority Areas	Core Capabilities	Example Project Types
		<ul style="list-style-type: none"> <li>▪ Sharing and leveraging intelligence and information</li> </ul>
Equipment and Capital Projects	<ul style="list-style-type: none"> <li>▪ Long-term vulnerability reduction</li> <li>▪ Infrastructure systems</li> <li>▪ Operational communications</li> <li>▪ Interdiction and disruption</li> <li>▪ Screening, search and detection</li> <li>▪ Access control and identity verification</li> <li>▪ Physical protective measures</li> </ul>	<ul style="list-style-type: none"> <li>▪ Protecting high-risk, high-consequence areas or systems that have been identified through risk assessments</li> <li>▪ Physical security enhancements <ul style="list-style-type: none"> <li>○ Security cameras (CCTV)</li> <li>○ Security screening equipment for people and baggage</li> <li>○ Lighting</li> <li>○ Access Controls</li> <li>○ Fencing, gates, barriers, etc.</li> </ul> </li> <li>▪ Enhancing Weapons of Mass Destruction and/or improvised explosive device prevention, detection, and response capabilities <ul style="list-style-type: none"> <li>○ Chemical/Biological/Radiological/Nuclear/Explosive detection, prevention, and response equipment</li> </ul> </li> </ul>
Exercises	<ul style="list-style-type: none"> <li>▪ Long-term vulnerability reduction</li> <li>▪ Operational coordination</li> <li>▪ Operational communications</li> <li>▪ Community resilience</li> </ul>	<ul style="list-style-type: none"> <li>▪ Response exercises, including exercise planning with community-based organizations</li> </ul>

For FY 2026, each SHSP and UASI recipient is required to submit an Investment Justification (IJ) for the NPAs with minimum spend requirements (i.e., Enhancing Election Security and Supporting Border Crisis Response and Enforcement). The investments must also account for at least the relevant minimum percentage of the applicant's SHSP and UASI allocations. SAAs may submit complete project-level information at the time of application, including the NPA IJs, but are not required to do so. *As a reminder, all SHSP and UASI-funded projects must have demonstrated a nexus to achieving target capabilities related to preventing, preparing for, protecting against, and responding to acts of terrorism.* At the same time, these projects can also help improve preparedness for other types of disasters.

## OPSG

### e. Goals and Objectives for OPSG

Operation Stonegarden (OPSG) supports enhanced cooperation and coordination among Customs and Border Protection (CBP)/United States Border Patrol (USBP), and federal, state, local, tribal, and territorial

law enforcement agencies to strengthen border security.

The programs objectives are to:

- Enhance collaboration and coordination among federal, state, local, tribal, and territorial law enforcement agencies to strengthen border security;
- Support joint efforts to secure borders, including land and water routes, and critical travel corridors; and
- Improve information and intelligence sharing to address border-related threats effectively.

*f. OPSG Funding Priorities*

FY 2026 Emphasis:

- Jurisdictions are encouraged to participate in the 287(g) program as part of their OPSG efforts when coordinated with and endorsed by USBP.
- Funding dedicated to support 287(g) activities under OPSG is encouraged but does not count toward the 10% minimum allocation required for the new “Supporting Border Crisis Response and Enforcement” National Priority Area (NPA) under SHSP and UASI.

The table below provides examples of project types.

**FY 2026 OPSG - Example Project Types**

Priority Areas	Core Capabilities	Example Project Types
<p><b>National Priorities</b></p> <p>Supporting Border Crisis Response and Enforcement</p>	<ul style="list-style-type: none"> <li>▪ Training and awareness</li> <li>▪ Community resilience</li> <li>▪ Operational coordination</li> <li>▪ Risk management for protection programs and activities</li> </ul>	<ul style="list-style-type: none"> <li>▪ Enhancing collaboration and coordination among federal, state, local, tribal, and territorial law enforcement agencies to strengthen border security</li> <li>▪ Supporting joint efforts to secure borders, including land and water routes, and critical travel corridors</li> <li>▪ Improving information and intelligence sharing to address border-related threats effectively</li> <li>▪ Providing staffing support to expand 287(g) screening operations within correctional facilities</li> <li>▪ Operational overtime costs directly tied to 287(g) screening,</li> </ul>

Priority Areas	Core Capabilities	Example Project Types
		<p>processing, and enforcement activities</p> <ul style="list-style-type: none"> <li>▪ Training programs for state and local law enforcement officers in immigration law, civil rights and civil liberties protections, and 287(g) procedures</li> </ul>

CBP/USBP remains the lead federal entity in determining eligibility, setting operational priorities, and coordinating all OPSG activities. Any use of 287(g) as part of eligibility must be developed in close coordination with CBP and reflect USBP's operational assessments and strategic goals.

## C. Performance Measures and Targets

### a) SHSP and UASI

1. Number of recipients and stakeholders participating in SHSP and UASI;
2. Number of recipients and stakeholders addressing capability gaps identified through the THIRA/SPR process;
3. Number of gaps mitigated in core capabilities that have a target(s) rated as high priority;
4. Percentage change in year-over-year capability levels relating to targeted high priority capabilities identified through the THIRA/SPR process; and
5. Number of subrecipients reporting reduced threats due to implementation of LETPAs.
6. Number of recipients achieving full compliance with the NPA requirements.

FEMA will calculate and analyze the above metrics through a review of state/territory and urban area SPR submissions and required programmatic reports.

Specific targets were not identified since they are reliant on THIRA/SPR scores specific to each applicant. Individual metric goals will be identified on a case-by-case basis depending on those grantees selected for the program(s).

### b. OPSG

1. Number of OPSG-supported arrests for border-related offenses;
2. Number of OPSG-funded overtime hours contributed by subrecipients to support and strengthen the U.S. CBP's border security operations; and
3. Number of SLTT law enforcement agencies participating in joint OPSG activities.

Specific targets were not identified since they are reliant on the U.S. Border Patrol's daily activity reports specific to each participating recipient. Individual metric goals will be identified on a case-by-case basis depending on those grantees selected for the program(s).

## D. Federal Assistance Type

Grant

## E. Program-Specific Unallowable Costs

### *a. Unallowable Costs for SHSP, UASI, and OPSG*

Per FEMA policy, the purchase of weapons and weapons accessories, including ammunition, is not allowed with HSGP funds. Grant funds may not be used for the purchase of the following equipment: firearms; ammunition; grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons installed. Unauthorized exercise-related costs include:

- Reimbursing for the maintenance or wear-and-tear costs of general use vehicles (e.g., construction vehicles), medical supplies, and emergency response apparatus (e.g., fire trucks, ambulances); and
- Equipment that is purchased for permanent installation and/or use, beyond the scope of the conclusion of the training or exercise (e.g., electronic messaging sign).

HSGP funds may not be used to support the hiring of sworn public safety officers for purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities (6 U.S.C. § 609(b)(1)(A)).

As directed by Section 2008(b)(2) of the *Homeland Security Act of 2002* (codified as amended at 6 U.S.C. § 609(b)(2)), all personnel and personnel-related costs, including those of intelligence analysts and operational overtime, are allowed up to 50% of HSGP funding without time limitation placed on the period of time that such personnel can serve. FEMA may provide a waiver at the request of the recipient to allow personnel expenses to exceed 50% of the amount awarded.

Applicants should refer to [IB 421b](#) or contact their FEMA Headquarters (HQ) Preparedness Officer for guidance and clarification.

### *b. Unallowable Costs for OPSG Only*

OPSG funds may not be used for the following:

- As directed by Section 2008(b)(2) of the *Homeland Security Act of 2002* (codified as amended at 6 U.S.C. § 609(b)(2)), OPSG recipients and subrecipients may not use more than 50% of their total award amount to pay for personnel activities unless a waiver is approved by FEMA. Recognizing that a significant percentage of these funds will be used to support operational overtime activities, when a state submits a grant application indicating that more than 50% of the funding will be allocated to personnel costs, FEMA will treat the grant application as a formal request for a waiver of the 50% limitation. FEMA's subsequent awarding of the grant will constitute approval of the waiver. A separate waiver request will not be necessary.
- Evidence collection, arrest processing, prosecution, and Traffic/DUI checkpoints, such as evidence documentation cameras, fingerprinting supplies, alcohol breathalyzers, portable work lights, traffic barricades, and similar law enforcement expenses.

- Staffing (other than overtime) and general information technology computing equipment and hardware, such as personal computers, faxes, copy machines, and modems.
- Hiring full-time or permanent sworn public safety officers.
- Supplanting of inherent routine patrols and law enforcement operations or activities not directly related to providing enhanced coordination between local and federal law enforcement agencies.
- Construction and/or renovation costs.
- Exercise expenses.

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

## F. General Funding Requirements

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

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

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

## G. Prohibition of Covered Equipment or Services

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

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

### Prohibition on Covered Foreign Unmanned Aircraft Systems (UAS)

Recipients, subrecipients, and their contractors or subcontractors must also comply with Section 1825 of the American Security Drone Act of 2023, enacted as part of the [National Defense Authorization Act for Fiscal Year 2024](#) (Pub. L. No. 118-31 §§ 1821-33, 41 U.S.C. 3901 note prec.). This provision mandates that, beginning December 22, 2025, no federal funds awarded through a contract, grant, or cooperative agreement, or otherwise made available may be used to procure a covered unmanned aircraft system (UAS) that is manufactured or assembled by a covered foreign entity. Significantly, no funds may be used

in connection with the operation of such a drone or UAS. For more information, refer to [Public Law 118-31](#) and [OMB Memorandum M-26-02, Ensuring Government Use of Secure Unmanned Aircraft Systems and Supporting United States Producers](#).

## H. Beneficiary and Participant Eligibility

### Beneficiary

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

### Participant

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

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

## I. Indirect Costs

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

## J. Budget Period

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

## K. Pre-Award Costs

Recipient (SAA) pre-award costs are allowable only with prior written approval from DHS/FEMA and as included in the award agreement. To request pre-award costs, a written request must be included with the application signed by the SAA. The letter must outline what the pre-award costs are for, including a detailed budget break-out of pre-award costs from the post-award costs, and a justification for approval. Subrecipients cannot claim pre-award costs. For more information, please contact your assigned Preparedness Officer.

## L. Management and Administration Costs

M&A costs are allowed.

Recipients can use up to 5% of their HSGP funds for M&A purposes. *Homeland Security and Further Additional Continuing Appropriations Act, 2026*, Pub. L. No. 119-86.. Subrecipients may also use up to 5% of the funding passed through by the state specifically for M&A related to the HSGP award.

Recipients or subrecipients can apply M&A costs toward meeting the NPA spending requirements. For example, if a recipient spent \$5,000 on administering election security projects, it could count toward the mandatory 3% allocation for the election security NPA.

The total M&A funds a state can retain are based on 5% of the combined total of its SHSP, UASI, and OPSG awards. However:

- States must ensure subrecipient awards meet the mandatory pass-through requirements before retaining M&A funds.

Pass-through percentages are calculated based on the total HSGP award, before M&A deductions. Under OPSG, subrecipients, including local law enforcement agencies referred to as "friendly forces", can use up to 5% of their awarded funds for M&A expenses (*Homeland Security and Further Additional Continuing Appropriations Act, 2026*, Pub. L. No. 119-86) however, the total amount retained cannot exceed 5% of the subrecipient's subaward. Friendly forces are local law enforcement entities that are subordinate subrecipients under OPSG. In other words, friendly forces are entities that receive a subaward from a subrecipient under the OPSG program. Friendly forces must comply with all requirements of subrecipients under 2 C.F.R. Part 200. In retaining these funds, states may retain a maximum of 2.5% of the OPSG allocation, which must be withheld from the pass-through to each subrecipient county or tribe in an equal percentage. The SAA may also retain additional funding from its SHSP award to manage and administer the OPSG award, but that additional amount is also capped at an amount equal to 2.5% of the OPSG award.

Examples of applying this principle:

#### SAA 1

- Total award: \$6 million

SHSP: \$1 million OPSG: \$2.5 million UASI: \$2.5 million

M&A Maximum: \$300,000 (5% of \$6 million)

Maximum M&A for SHSP = \$50,000

Maximum M&A for OPSG = \$125,000. Of that amount, \$62,500 (2.5%) may be retained from the OPSG allocation, and the other \$62,500 would come from the SHSP allocation. Any amount used to manage and administer OPSG that is charged to SHSP may be above and beyond \$50,000 available to make the SHSP allocation.

Maximum M&A for UASI = \$125,000

#### SAA 2

- Total award: \$4.5 million

SHSP: \$3.5 million OPSG: \$1 million

M&A Maximum: \$225,000 (5% of \$4.5 million)

Maximum M&A for SHSP = \$175,000

Maximum M&A for OPSG = \$50,000. Of that amount, \$25,000 (2.5%) may be retained from the OPSG allocation, and the other \$25,000 would come from the SHSP allocation. Any amount used to manage and administer OPSG that is charged to SHSP may be above and beyond the \$175,000 available to manage the SHSP allocation.

M&A charged to OPSG, SHSP, or UASI funding must be used to support the appropriate program.

M&A are not overhead costs but are necessary direct costs incurred in direct support of the federal award or because 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. See the [Preparedness Grants Manual](#) for information on M&A costs.

## M. Authorizing Authority

Section 2002 of the *Homeland Security Act of 2002*, Pub. L. No. 107-296 (codified as amended at 6 U.S.C. § 603).

## N. Appropriation Authority

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



## Step 2: Get Ready to Apply

### In this step

Submission Requirements and Application Deadlines 31

# Submission Requirements and Application Deadlines

## A. Registration

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

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

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

## B. Requesting the Application Package

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

## C. Application and Submission Instructions

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

1. Apply for, update, or verify their UEI number and EIN from the Internal Revenue Service;
2. Provide their UEI number in the application;
3. Have an account with [login.gov](https://login.gov);
4. Register for, update, or verify their [SAM.gov](https://sam.gov) account and ensure the account is active before submitting the application;
5. Register in FEMA GO, add the organization to the system, and establish the Authorized Organizational Representative (AOR). The organization’s electronic business point of contact (eBiz POC) from the SAM registration may need to be involved in this step. For step-by-step instructions, see the [FEMA GO Startup Guide](https://fema.gov);
6. Submit the complete application in FEMA GO; and
7. Always maintain an active SAM registration with current information during which the applicant has an active federal award, an application, or plan under consideration by a federal awarding agency. As part of this, applicants must also provide information on an applicant’s immediate and highest-level owner and subsidiaries, as well as on all predecessors that have been awarded federal contracts or federal financial assistance within the last three years, if applicable.

Per [2 C.F.R. 25.110\(a\)\(2\)\(iv\)](https://www.ecfr.gov/current/title-47/chapter-I/subchapter-B/part-25/subpart-110/section-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](mailto:fema-grants-news@fema.dhs.gov) and provide the details of the exigent circumstances.

## D. How to Register to Apply

### General Instructions

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

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

### Obtain a UEI Number

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

### Obtain Employer Identification Number

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

### Create a login.gov account

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

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

For more information on the login.gov requirements for SAM registration, refer to [SAM.gov](#).

### Register with SAM.gov

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

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

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

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

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

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

- Google Chrome;
- Mozilla Firefox;
- Apple Safari; and
- Microsoft Edge.

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

## E. Submitting the Final Application

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

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

## F. Application Deadline

July 24, 2026 11:59 p.m. Eastern Time

## G. Pre-Application Requirements Deadline

Not applicable.

## H. Post Application Requirements Deadline

Not Applicable.

## I. Effects of Missing Deadlines

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

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



# Step 3: Write Your Application

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# Application Contents and Format

## A. Application Requirements

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

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

## B. Required Documents, Content, and Formatting

Not Applicable.

## C. Program-Specific Required Documents and Information

Start by visiting Grants.gov and searching for the Homeland Security Grant Program posting. Once you find the posting, go to the Related Documents tab to download the necessary templates. Fill out these forms carefully, ensuring all information is accurate and clearly labeled. Save the completed forms as Adobe PDF files. Finally, log in to FEMA GO and upload the PDFs as part of your application.

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

### SHSP

- FEMA GO – Web based Summary of Grant Request Details
- Senior Advisory Committee (SAC) Charter and Membership / Point of Contact List

### UASI

- FEMA GO – Web based Summary of Grant Request Details
- Urban Area Working Group (UAWG) Charter and Membership / Point of Contact List

### OPSG

- Operations Orders – *Post Award*

### Applicable to All Programs (as appropriate)

- Detailed Budgets (web based)
- Pre-Award Costs
- Indirect Cost Agreement

For additional documents and post-award application requirements (e.g., SAFECOM letter and others), please refer to Section 9 Post-Award Requirements and Administration for guidance.

*a. IJ Development: SHSP and UASI*

Each IJ begins with an overview that aligns the proposed investments with the applicant's homeland security strategy and the program's goals.

1. Investments: Applicants must propose a minimum of two and a maximum of twelve investments within the IJ. Each investment represents a strategic area of focus and should include:
  - Investment Name: A clear title that reflects the focus area.
  - Description: An explanation of how the investment supports planning, organization, equipment, training, and exercises.
  - Alignment: Identification of goals and objectives from the State or Urban Area Homeland Security Strategy that the investment supports.
2. Projects: Each investment contains one or more projects detailing specific activities. For each project, the IJ requires:
  - Project Name and Description: A concise title and summary of the project's purpose and activities.
  - Subrecipient Information: Details about any subrecipients involved, including their names and whether they are state or local entities.
  - Location: The primary location's zip code where the project will be implemented.
  - Core Capability Supported: The main capability the project aims to build or sustain.
  - Shareability and Deployability: Information on whether the project's activities can be shared with or deployed to other jurisdictions.
3. Funding Details: The IJ must specify the funding amount for each investment and project, ensuring alignment with program guidelines and the minimum spending thresholds for NPAs and LETPA.
4. Capability Gaps and Outcomes: Applicants should describe existing capability levels, identify gaps the investment intends to address, and outline the expected outcomes and improvements resulting from the proposed projects.

*b. LETPA and NPA Requirements*

Applicants must ensure their IJs meet specific requirements for LETPA and the NPAs.

1. LETPA
  - At least 35% of SHSP and UASI funds must go toward LETPA projects that prevent terrorism, such as law enforcement training or equipment.
  - Eligible activities must have a clear nexus to law enforcement terrorism prevention, including equipment, training, exercises, and operational overtime directly related to preventing terrorism.
  - Applicants should clearly identify which investments and projects contribute to the LETPA allocation within their IJs.
  - It's allowable for an investment to simultaneously support LETPA and an NPA, provided it meets the criteria for both.
  - Investments and projects meeting LETPA requirements must be clearly labeled in the IJ.

## NPA:

- At least 30% of SHSP and UASI funds must go toward projects in five NPAs:
  1. Protecting soft targets/crowded places.
  2. Supporting Homeland Security Task Forces and Fusion Centers.
  3. Enhancing cybersecurity.
  4. Enhancing election security (requires at least 3%); and
  5. Supporting Border Crisis Response and Enforcement (requires at least 10%).
- Among these, only "Enhancing election security" and "Supporting Border Crisis Response and Enforcement" have a specified minimum spend requirement of 3% and 10%, respectively. The remaining 17% can be flexibly allocated across the remaining NPAs.
- For NPAs with a minimum spend requirement (election security and border crisis response), related projects must be consolidated into a single, clearly labeled IJ.
- Other NPA projects may be combined into one or more IJs, but applicants must clearly identify which NPAs each project supports to ensure they count toward the 30% minimum allocation.

*c. Fusion Center Project IJ Requirement*

For SHSP and UASI funded investments, each applicant must designate one project in support of the state or territory's designated fusion center under the "Supporting Homeland Security Task Forces and Fusion Centers" priority area. Coordination with the fusion center is required when developing the project prior to submission. Additional guidance on developing fusion center projects can be found below and in the [Preparedness Grants Manual](#).

*Note: Applicants may also identify additional fusion center projects or projects in support of homeland security task forces under this priority area in addition to the required designated fusion center project.*

Applicants must identify a fusion center project that includes:

- Alignment with the Designated Fusion Center: Clearly indicate which fusion center the project supports and that it's under the "Supporting Homeland Security Task Forces and Fusion Centers" priority area.
- Project Description and Funding Details: Provide a brief narrative describing the proposed activities and a detailed funding breakdown that directly supports the fusion center.

The narrative and financial itemization must align with fusion center improvement or sustainment needs, as outlined in the Fusion Center Performance Measures section of the Preparedness Grants Manual. Recipients can also refer to the [Fusion Centers | Homeland Security](#) website for more information.

*d. What Happens if IJ Requirements Aren't Met?*

- If IJs don't meet the NPA and LETPA spending requirements, FEMA may place a hold on those impacted funds until the issues are resolved.
- Applicants can provide project details either during the application process or by including them in the Biannual Strategy Implementation Report due by January 30, 2027.

*e. How to Succeed*

- Clearly explain how your projects meet LETPA and NPA goals, and which IJ includes the Fusion

Center.

- Ensure investments and projects align with homeland security strategies and fill capability gaps.
- Maintain detailed records to support your application and help FEMA review it.

By following these steps, applicants can ensure their funding proposals are clear, meet program requirements, and align with homeland security priorities.

*f. FEMA GO - Grant Request Details (Web-Based)*

When completing the Grant Request Details section in the FEMA GO Application, entities are strongly encouraged to provide complete details about their proposed projects. This includes project names, descriptions, and associated costs to ensure clarity and accuracy in funding requests.

However, applicants will not be penalized if they do not enter full details at this stage. Recipients will have another opportunity to refine and expand upon this information by November 30<sup>th</sup> in advance of the Winter BSIR.

At a minimum, applicants must submit the IJ to demonstrate the projects they intend to fund. The IJ provides a high-level summary of proposed initiatives and aligns them with grant priorities.

For additional guidance on completing the Grant Request Details section, refer to the FEMA GO Application Process Guide or consult your HQ FEMA Preparedness Officer.

*g. Senior Advisory Committee (SAC) Charter and Advisory List*

Recipients are required to establish a SAC and provide a copy of the SAC Charter with their application. The SAC Charter should include a detailed description of the committee's composition, governance processes, meeting frequency, decision-making procedures, and defined roles and responsibilities. All members of the SAC should sign and date the charter to indicate their agreement with its content and their representation on the committee. Recipients must include the information as an attachment in FEMA GO when submitting their application. SAA will use the URT to verify compliance with SAC charter requirements. For more information on SAC composition, scope, responsibilities, see the [Preparedness Grants Manual](#).

*h. National Incident Management System (NIMS) Implementation*

Prior to allocation of any federal preparedness awards, recipients must ensure and maintain adoption and implementation of NIMS, including implementation of important operational systems defined under NIMS, such as the Incident Command System (ICS). The list of objectives used for progress and achievement reporting is on FEMA's website at <https://www.fema.gov/emergency-managers/nims/implementation-training>.

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

*i. Emergency Management Assistance Compact (EMAC) Membership*

In support of the National Preparedness Goal (the Goal), SHSP recipients must participate in the EMAC. Exceptions are made for American Samoa and the Commonwealth of the Northern Mariana Islands, which are not required to join EMAC at this time.

All assets supported in part or entirely with FY 2026 HSGP funding must be readily deployable and NIMS-

typed, when possible, to support emergency or disaster operations per existing EMAC agreements. In addition, funding may be used for the sustainment of core capabilities that, while they may not be physically deployable, support national response capabilities, such as Geographic/Geospatial Information Systems, interoperable communications systems, and capabilities as defined under the Mitigation Mission Area of the Goal.

*j. Urban Area Point of Contact*

An SAA must confirm a specific POC with the designated high-risk urban area. The SAA POC is responsible for identifying and coordinating with the POC for the Urban Area Working Group (UAWG). This information must be provided to FEMA with the grant application. SAAs must work with existing high-risk urban areas to ensure that information for current POCs is on file with FEMA. For more information on UAWG composition, scope, responsibilities, and charter, see the [Preparedness Grants Manual](#).

*k. Detailed Budget*

Applicants must complete the web-based budget summary within FEMA GO for all funds requested at the time of the application. For detailed guidance, refer to the [FEMA GO Application Process Guide](#). For a visual guide on entering sub-recipient management costs in FEMA GO, you may find the following tutorial helpful: [How To Enter Sub-recipient Management Costs In FEMA-Go](#).

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

Not applicable.



## Step 4: Learn about the Award Review Process

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# Application Review Information

## A. Threshold Criteria

The SAA is the sole entity authorized to submit HSGP applications to FEMA on behalf of the state and subrecipients. This section highlights the specific criteria that determine ineligibility, ensuring applicants understand and adhere to the program's requirements.

### a. *Entities Ineligible for HSGP Funding*

- Non-SAA Organization - SAAs are the only applicants eligible to submit HSGP applications to FEMA. This includes applications for SHSP, UASI, and OPSG.
- Unaffiliated or Unauthorized Representatives - Applications submitted by individuals who are not current employees, personnel, or authorized representatives of the applicant organization (e.g., consultants or contractors acting on behalf of an organization) will be deemed ineligible.
- Organizations Not Registered in SAM.gov - Applicants that fail to register and maintain an active profile in SAM.gov, or those without a UEI, are not eligible to receive funding.
- Direct Applications by Tribal Governments- Tribal governments cannot directly apply for HSGP funding (SHSP, UASI, OPSG). However, they may receive funding as subrecipients through their state's SAA.

### b. *Ineligible Projects*

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

### c. *Non-Compliance with Federal Requirements*

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

## B. Application Criteria

### a. *Programmatic Criteria*

#### 1. Risk Methodology

The risk methodology determines the relative risk<sup>2</sup> of terrorism a jurisdiction faces by assessing the expressed or implied threats, the asset/system vulnerabilities, and potential consequences. Each component is comprised of data elements that are reviewed yearly, in collaboration with FEMA stakeholders, to ensure alignment with the changing U.S. terrorism threat environment. Each

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<sup>2</sup> DHS defines risk as: "potential for an adverse outcome assessed as a function of hazard/threats, assets and their vulnerabilities, and consequences." See DHS Lexicon Terms and Definitions: 2018 Edition – Revision 04, (Apr. 2018)

eligible jurisdiction's relative risk is assessed, which helps to inform grant funding. For more information on the SHSP, UASI, and OPSG allocation processes, please see [Appendix 1: HSGP Allocations](#).

The three components of risk and their functions are outlined below:

- Threat: Assesses reports documenting indication of potential harm to life, information, operations, the environment and/or property within a jurisdiction.
- Vulnerability: Assesses assets and systems - such as infrastructure, borders, special events, and movements of individuals or groups - that may render terrorist attacks on a jurisdiction more likely to succeed, if attempted.
- Consequence: Assesses the impact of a terrorist attack on a jurisdiction through direct measures such as the numerical values for its population, gross domestic product, and infrastructure.

NOTE: The risk methodology is separate from the THIRA/SPR process. Risk methodology results do affect grant allocations while the THIRA/SPR process does not.

#### *b. Application Evaluation Criteria*

FEMA will evaluate the FY 2026 HSGP applications for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed investments. FEMA's review will include verification that each IJ and project:

- Aligns with at least one core capability identified in the Goal;
- Demonstrates how investments support building capability and/or closing capability gaps or sustaining capabilities identified in the THIRA/SPR process; and
- Supports a NIMS-typed resource and whether those assets are deployable/shareable to support emergency or disaster operations per existing EMAC agreements.

In addition to the above, FEMA will evaluate whether proposed projects are: 1) both feasible and effective at reducing the risks for which the project was designed; and 2) able to be fully completed within the three-year period of performance. FEMA will use the information provided in the application and after the submission of the first BSIR to determine the feasibility and effectiveness of a grant project. To that end, IJs should include:

- An explanation of how the proposed project(s) will achieve objectives as identified in the SPR, including expected long-term impact where applicable, and which core capability gap(s) it helps to close and how;
- A summary of the status of planning and design efforts accomplished to date (e.g., included in a capital improvement plan); and
- A project schedule with clear milestones.

Recipients are expected to conform, as applicable, with accepted engineering practices, established codes, standards, modeling techniques, and best practices, and participate in the development of case studies demonstrating the effective use of grant funds, as requested.

FEMA will also review any submitted NPA-aligned IJs and projects to ensure they meet the minimum spend requirements. Additional information on how the NPA IJs and projects will be reviewed for

effectiveness is included in the Review and Selection Process section below.

### *c. Review and Selection Process*

#### 1. SHSP and UASI

FY 2026, HSGP applications will be reviewed through a two-phase state and federal review process for completeness, adherence to programmatic guidelines, feasibility, and how well the IJ (project description and justification) addresses the identified risk(s).

#### *State Review*

The SAA is the sole entity authorized to submit HSGP applications to FEMA on behalf of the state and subrecipients. The SAA reviews subaward applications to ensure they meet the legal, financial, and programmatic requirements set forth by FEMA and the state's guidelines before submitting on behalf of the state to DHS/FEMA.

#### *Federal Review*

All proposed investments will undergo a federal review by DHS/FEMA to ensure compliance with all administrative and eligibility criteria identified in the NOFO. The Federal Reviewers will check each proposed investment for the following:

- Eligibility, feasibility, and alignment with the application criteria listed in this NOFO;
- Compliance and effectiveness in addressing NPAs, ensuring required spend percentages are met;
- Compliance with SAFECOM Guidance on Emergency Communications Grants (SAFECOM Guidance);
- and,
- LETPA project alignment with program objectives and required percentages.

#### National Priority Area Program Holds

If applicants submit IJs and project-level details at the time of application, FEMA will evaluate effectiveness prior to award. If projects do not sufficiently align with NPAs, up to 30% of funds may be placed on hold until revisions are made.

If applicants submit IJs and project-level details as part of their December 2026 BSIR, 30% of funds will be placed on hold until FEMA reviews the BSIR and confirms alignment with NPAs.

#### 2. OPSG

For OPSG, applications will be reviewed by the SAA and USBP Sector Headquarters for completeness and adherence to programmatic guidelines and evaluated for anticipated feasibility, need, and impact. DHS/FEMA will verify compliance with all administrative and eligibility criteria outlined in the NOFO. OPSG funds will be allocated among the eligible jurisdictions based on risk-based prioritization using the OPSG Risk Assessment described in [Appendix 1: HSGP Allocations](#). Final funding allocations are determined by the Secretary of Homeland Security, who may consider information and input from various law enforcement offices or subject-matter experts within the Department.

Factors considered include but are not limited to:

- Threat and vulnerability assessments;
- Total miles of the border;
- Border-specific law enforcement intelligence; and

- Feasibility of Operations Orders to designated localities within border states and territories.

This comprehensive review and selection process ensures that HSGP and OPSG funds are distributed effectively to enhance national preparedness, border security, and overall homeland security efforts.

## C. Financial Integrity Criteria

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

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

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

## D. Supplemental Financial Integrity Criteria and Risk Review

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

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

## E. Reviewer Selection

Reviewers for the HSGP NOFO are selected from within FEMA, across the federal government, and, where applicable, may include external subject matter experts. These reviewers are chosen based on their expertise in homeland security, emergency management, and grant administration.

To prevent conflicts of interest, reviewers must disclose any personal or professional relationships with applicants before the review process begins. Any individual with a conflict is recused from evaluating the affected application. Additionally, reviewers are required to complete ethics and impartiality training to ensure a fair and unbiased review process.

## F. Merit Review Process

HSGP applications are not reviewed solely on merit. Although merit plays a role—such as evaluating the effectiveness, feasibility, and impact of proposed investments—the review process heavily incorporates

risk-based methodologies and compliance criteria. HSGP does not use a weighted scoring method. All criteria are considered equally during the review process.

Review Process:

- State Review (SHSP and UASI): The SAA conducts an initial eligibility review and prioritizes projects for submission to FEMA.
- OPSG Review: OPSG applications are reviewed in coordination with the SAA and USBP Sector Headquarters to assess completeness, feasibility, need, and the anticipated impact of proposed Operations Orders.
- Federal Review: FEMA conducts a federal review of all applications to ensure eligibility, feasibility, and compliance with NOFO requirements.

Although merit is a key factor in assessing alignment with national priorities, state and local needs, expected impact, and cost-effectiveness, funding decisions also weigh risk assessments, eligibility criteria, and available funding allocations.

## G. Final Selection

The Secretary of Homeland Security makes the final funding decisions, considering risk assessments, subject-matter-expert input, and project feasibility, while also ensuring alignment with national priorities and compliance with legal, financial, and policy guidelines for strategic allocation of funds.

# Intergovernmental Review

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

An intergovernmental review may be required. Applicants must contact their state's Single Point of Contact (SPOC) to comply with the state's process under Executive Order 12372. No further action is needed if you do not find a contact for your state in the [latest version of the SPOC list](#).

**Note:** This requirement does not apply to tribal governments.



## Step 5: Learn What Happens After Award

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# Award Notices

## A. Notice of Award

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

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

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

Recipients must accept their awards no later than 60 days from the award date. Recipients shall notify FEMA of their intent to accept the award and proceed with work in the FEMA GO system. In addition, FEMA interprets the date that an entity 'receives a grant' to be the date upon which FEMA releases any remaining funding holds in FEMA GO. Therefore, the 45-day passthrough requirement starts on the date when the amendment is issued in FEMA GO and FEMA makes the funding available to the SAA for drawdown. For detailed guidance on managing preparedness grants, including pass-through requirements and timelines, please refer to the [FEMA Preparedness Grants Manual](#), Pass-Through Requirements.

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

## B. Pass-Through Requirements

Under HSGP, SAAs must pass at least 80% of SHSP and UASI funding to local or tribal governments. The state may retain up to 20% for state-level needs. "Pass-through" means SAAs must allocate funds to eligible entities as defined by law, such as counties, municipalities, tribal governments, or other public entities. For detailed guidance on HSGP pass-through requirements and timelines, please see Section 8 of the [FEMA Preparedness Grants Manual](#).

After award acceptance, the state must pass through at least 80% of SHSP and UASI funds to local or tribal governments within 45 days. As noted in the previous section, FEMA interprets the date that an entity 'receives a grant' to be the date upon which FEMA releases any remaining funding holds in FEMA GO. Therefore, the 45-day passthrough requirement starts on the date when the amendment is issued in FEMA GO and FEMA makes the funding available to the SAA for drawdown. Funds must be distributed unconditionally, and the SAA must certify to FEMA that the pass-through is complete, listing amounts and recipients. U.S. territories are exempt, except for Puerto Rico, which must comply. States may keep more than 20% of funds only with written consent from local recipients, outlining the retained amount and purpose.

## C. Note Regarding Pre-Award Costs

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

## D. Obligation of Funds

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

## E. Notification to Unsuccessful Applicants

During the post-award review, FEMA will notify the recipient about unsuccessful subrecipients or projects and provide feedback. The SAA is then responsible for notifying the subapplicants and sharing any relevant feedback or information.

# Post-Award Requirements and Administration

## A. Administrative and National Policy Requirements

### Presidential Executive Orders

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

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

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

## Subrecipient Monitoring and Management

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

### Termination of a Federal Award

1. The termination condition below applies to the grant award and the “Termination of a Federal Award” term and condition in the FY 2026 DHS Standard Terms and Conditions does not.
2. Termination of the federal award by FEMA  
FEMA, in its sole discretion, may terminate the federal award in whole or in part for one of the following reasons consistent with [2 C.F.R. § 200.340](#):
  - a. If the recipient or subrecipient fails to comply with the terms and conditions of the federal award.
  - b. With the consent of the recipient, in which case FEMA and the recipient must agree upon the termination conditions. These conditions include the effective date and, in the case of partial termination, the portion to be terminated.
  - c. If the federal award no longer effectuates the program goals or agency priorities. Under this provision, FEMA may terminate the award for these purposes if any of the following reasons apply:
    - i. FEMA determines that a specific award objective is ineffective at achieving program goals as described in this NOFO;
    - ii. FEMA determines that an objective of the award as described in this NOFO will be ineffective at achieving program goals or agency priorities;
    - iii. FEMA determines that the design of the grant program is flawed relative to program goals or agency priorities;
    - iv. FEMA determines that the grant program is not aligned to either the DHS Strategic Plan, the FEMA Strategic Plan, or successor policies or documents;
    - v. FEMA changes or re-evaluates the goals or priorities of the grant program and determines that the award will be ineffective at achieving the updated program goals or agency priorities; or
    - vi. For other reasons based on program goals or agency priorities described in the termination notice provided to the recipient pursuant to [2 C.F.R. § 200.341](#).
  - d. For convenience, including if the award no longer advances the national interest. Termination for convenience only applies to discretionary awards, as that term is defined at [2 C.F.R. § 200.1](#). The term “discretionary award” does not include grants where legislation establishes an entitlement to the funds on the part of the recipient, such as block grants or those awarded based on a statutory formula.
3. Termination of a Subaward by the Pass-Through Entity
  - a. The pass-through entity may terminate a subaward in whole or in part for one of the following reasons identified in [2 C.F.R. § 200.340](#):
    - i. If the subrecipient fails to comply with the terms and conditions of the federal award.

- ii. With the consent of the subrecipient, in which case the pass-through entity and the subrecipient must agree upon the termination conditions. These conditions include the effective date and, in the case of partial termination, the portion to be terminated.
  - b. If the pass-through entity's award has been terminated the pass-through entity must terminate its subawards.

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

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

#### 5. Impacts of Termination

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

#### 6. Notification requirements

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

#### 7. Opportunities to Object and Appeals

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

#### 8. Effects of Suspension and Termination

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

## B. DHS Standard Terms and Conditions

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

federal award package.

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

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

Pursuant to the preliminary injunction order issued on November 21, 2025, in City of Chicago et al. v. Noem, et al., No. 25-CV-12765 (N.D. Ill.), the following terms and conditions do not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect: (1) the DHS Standard Term and Condition titled " Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act"; and (2) the DHS Standard Term and Condition titled " All Executive Orders Related to Grants". If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, both terms will immediately become effective. As stated above, paragraph (2)(a)(ii) of the DHS Standard Term and Condition titled “Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act” will not apply even if the preliminary injunction is stayed, vacated, or extinguished.

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

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

## C. Financial Reporting Requirements

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

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

Reporting Period	Report Due Date
October 1–December 31	January 30
January 01–March 31	April 30
April 01–June 30	July 30
July 01–September 30	October 30

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

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

Recipients must file the FFR electronically using FEMA GO. Note that recipients for awards covered in this manual made before FY 2024 must file the FFR using the Payment and Reporting Systems (PARS).

## D. Programmatic Performance Reporting Requirement

### Biannual Strategy Implementation Report Snapshot

1. The Biannual Strategy Implementation Report (BSIR) must be submitted annually throughout the POP.
2. The BSIR is a snapshot of approved project-level details reported in FEMA GO. Project-level detail entry shows how planned expenditures align to programmatic objectives and support Planning, Organization, Equipment, Training, and Exercises. The entry of project-level details to FEMA GO should be completed by no later than November 30, 2026. The first BSIR will be due by January 30, 2027, or 30 days after the end of the first reporting period of the award. Programmatic requirements, including request for waivers and changes to National Priority Areas, must be coordinated with the appropriate FEMA HQ Preparedness Officer prior to the fact. Subsequent project-level entries in FEMA GO must capture those approvals and updates to obligations, expenditures, and other significant developments by no later November 30<sup>th</sup> of each year until closeout.
3. The BSIR must be submitted through FEMA GO.
4. The BSIR due dates are detailed below:

<i>Reporting Period</i>	Report Due Date
January 01-December 31	January 30

## E. Closeout Reporting Requirements

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

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

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

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

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

### Administrative Closeout

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

## F. Additional Reporting Requirements

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

### a. *Reporting on the Implementation of the National Preparedness System*

Recipients are required to complete the THIRA every three years and the SPR annually through the URT on the [Preparedness Toolkit](#) no later than December 31. These assessments help jurisdictions identify and address capability gaps to enhance overall preparedness. See the [Preparedness Grants Manual](#) for information on reporting on the Implementation of the National Preparedness System.

### b. *BSIR*

Recipients are required to complete the BSIR Snapshot. The BSIR Snapshot is submitted twice a year—in July and January—and provides detailed updates on the status and progress of funded projects. For comprehensive guidance on BSIR Snapshot submission and other reporting requirements, see the [Preparedness Grants Manual](#).

### c. *Emergency Communications Investments - SAFECOM Compliant Letter*

An Emergency Communications Investments - SAFECOM Compliant Letter is required when utilizing federal grants to fund emergency communications projects. The signatory authority for the SAA must certify in writing to DHS/FEMA their compliance with the SAFECOM Guidance. The certification letter should be coordinated with the Statewide Interoperability Coordinators (SWIC) for each state and must be uploaded to FEMA GO at the time of the Winter BSIR submission.

For detailed information on SAFECOM Guidance and compliance requirements, refer to the <https://www.cisa.gov/safecom/funding>. If you have further questions or need assistance, contact the SAFECOM Program at [SAFECOMGovernance@cisa.dhs.gov](mailto:SAFECOMGovernance@cisa.dhs.gov).

### d. *Operations Orders for OPSG*

The Operations Order (OO) is a detailed plan that explains the specific aspects of an operation, including its goals, tasks, timelines, and resources needed. It provides clear instructions on how to carry out the operation, identifying who is responsible for each task, the resources required, and the expected results. Recipients are required to submit an OO to show their ability to implement the proposed activities effectively, align with program goals, and meet funding requirements.

#### 1. Accessing the OO Template Instructions

To access the OPSG OO Template:

- Find the HSGP posting via the search function on Grants.gov;
- Select the Related Documents tab on the posting; and
- Click on the OPSG OO Template and fill out all sections of the template.

#### 2. Writing the Executive Summary

The OO Executive Summary must:

- Identify the organization name, point of contact, committees, and other structures accountable for implementing OPSG in the jurisdiction (typically this will be a program lead or manager overseeing operations and individuals assigned to that agency); and
- Describe how federal and SLTT law enforcement agencies will work together to establish and

enhance coordination and collaboration on border security issues.

### 3. Budget Requirements Overview

The OO Detailed Annual Budget must:

- Explain how costs and expenses were estimated; and
- Provide a narrative justification for costs and expenses.
- Supporting tables describing cost and expense elements (e.g., equipment, fuel, vehicle maintenance costs) may be included.

### 4. Submission Requirements

The OO must meet the following submission requirements:

- Must be submitted as an Adobe PDF document.
- All documents submitted must use the unique identifier created by the OPSG data management system from the original associated operation order.
- Applicable OPSG sector representatives must coordinate with the SAA and OPSG participants to submit an accurate inventory of all specified OPSG purchased property with each Operations Order/ Fragmentary Order (FRAGO).

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

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

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

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

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

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

## H. Reporting of Matters Related to Recipient Integrity and Performance

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

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

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

## I. Single Audit Reports

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

## J. Monitoring and Oversight

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

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

## K. Program Evaluation

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

As such, recipients and subrecipients are required to participate in a Program Office (PO) or a DHS Component-led evaluation, if selected. This may be carried out by a third party on behalf of the PO or the DHS Component. Such an evaluation may involve information collections including but not limited to,

records of the recipients; surveys, interviews, or discussions with individuals who benefit from the federal award, program operating personnel, and award recipients; and site visits or other observation of recipient activities, as specified in a DHS Component or PO-approved evaluation plan. More details about evaluation requirements may be provided in the federal award, if available at that time, or following the award as evaluation requirements are finalized. Evaluation costs incurred during the period of performance are allowable costs (either as direct or indirect) in accordance with [2 C.F.R. § 200.413](#).

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

## L. Payment Information

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

### Instructions to Grant Recipients Pursuing Payments

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

### Processing and Payment Timeline

FEMA must comply with regulations governing payments to grant recipients per [2 C.F.R. § 200.305](#). For grant recipients other than States, [2 C.F.R. § 200.305\(b\)\(3\)](#) stipulates that FEMA is to make payments on a reimbursement basis within 30 days after receipt of the payment request, unless FEMA reasonably believes the request to be improper. For state recipients, [2 C.F.R. § 200.305\(a\)](#) instructs that federal grant payments are governed by Treasury-State Cash Management Improvement Act (CMIA) agreement ("Treasury-State agreement") and default procedures codified at [31 C.F.R. part 205](#) and Treasury Financial Manual 4A-200, "Overall Disbursing Rules for All Federal Agencies."

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

If additional information is needed, a request for information will be issued by FEMA to the recipient; recipients are strongly encouraged to respond to any additional FEMA request for information inquiries

within three business days. If an adequate response is not received, the request may be denied, and the entity may need to submit a new reimbursement request; this will re-start the 30-day timeline.

### Submission Process

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

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

1. Grant ID / Award Number
2. Total amount requested for drawdown
3. Purpose of drawdown and timeframe covered (must be within the award performance period)
4. Subrecipient Funding Details (if applicable).
  - Is funding provided directly or indirectly to a subrecipient?
    - If no, include statement “This grant funding is not being directed to a subrecipient.”
    - If yes, provide the following details:
      - The name, mission statement, and purpose of each subrecipient receiving funds, along with the amount allocated and the specific role or activity being reimbursed.
      - Whether the subrecipient’s work or mission involves supporting aliens, regardless of whether FEMA funds support such activities.
      - Whether the payment request includes an activity involving support to aliens.
      - Whether the subrecipient has any diversity, equity, and inclusion practices.<sup>3</sup>

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<sup>3</sup> Pursuant to the preliminary injunction order issued on November 21, 2025, in *County of Santa Clara et al. v. Noem, et al.*, No. 25-cv-08330-WHO (N.D. Cal.), the DHS Standard Term and Condition titled “Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act” does not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect. If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, the term will immediately become effective.

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

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

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

5. Supporting documentation to demonstrate that expenses are allowable, allocable, reasonable, and necessary under [2 C.F.R. part 200](#) and in compliance with the grant's NOFO, award terms, and applicable federal regulations.

## M. Immigration Conditions

### Materiality of Pending Immigration Condition

An immigration term and condition, including those in the DHS Standard Terms and Conditions, may be material to the Department of Homeland Security's decision to make this grant award, and the Department of Homeland Security may take any remedy for noncompliance, including termination, if the state or territorial recipient or any local government subrecipient fails to comply with this term and condition. No final agency determination has been made as of the date of this publication.<sup>4</sup>

# Other Information

## A. Period of Performance Extension

Extensions to the period of performance are allowed.

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

## B. Environmental Planning and Historic Preservation (EHP) Compliance

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

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

FEMA is sometimes required to consult with other regulatory agencies and the public to complete the review process. Federal law requires EHP review to be completed before federal funds are released to carry out proposed projects. FEMA may not be able to fund projects that are not in compliance with applicable EHP laws, Executive Orders, regulations, and policies. FEMA may recommend mitigation

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<sup>4</sup> The DHS Standard Term and Condition titled "Communication and Cooperation with the Department of Homeland Security and Immigration Officials" and paragraph (2)(a)(ii) of the term titled "Federal Anti-Discrimination Laws Material to the Government's Payment Decisions Under the False Claims Act" do not apply to any funding decisions associated with the Operation Stonegarden (OPSG) program.

measures, alternative courses of action, or both to lessen impacts to EHP resources and bring the project into EHP compliance. If a proposed project has been evaluated by another federal agency, FEMA may be able to streamline portions of the EHP review by adopting or supplementing previous analyses performed under the National Environmental Policy Act. If a proposed project has previously been reviewed by another federal agency, please provide those documents for FEMA's consideration.

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

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

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

## C. Procurement Compliance

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

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

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

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

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

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

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

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

## Threshold Increases Effective October 1, 2025

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

## Procurement Standards: Competition and Conflict of Interest

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

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

## Real Conflict of Interest

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

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

## Organizational Conflict of Interest

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

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

### Contractors Drafting Requirements

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

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

### Supply Schedules and Purchasing Programs

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

Information on General Services Administration programs, including multiple award schedules, for states, Indian Tribes (Tribal Nations), and local governments, and their instrumentalities, can be found in [Purchasing Under a Federal Award](#).

### Procurement Documentation

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

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

- Solicitation documentation, such as requests for quotes, invitations for bids, or requests for proposals;
- Responses to solicitations, such as quotes, bids, or proposals;
- Pre-solicitation independent cost estimates and post-solicitation cost/price analyses on file for review by federal personnel, if applicable;

- Contract documents and amendments, including required contract provisions; and
- Other documents required by federal regulations applicable at the time a grant is awarded to a recipient.

## D. Buy America Preference Requirements for Infrastructure

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

Recipients and subrecipients provided funds under this program for an infrastructure project must comply with FEMA's implementation requirements of the Build America, Buy America Act, as detailed in [FEMA's Buy America Preference Policy](#). See also [2 C.F.R. Part 184, Buy America Preferences for Infrastructure Projects](#), and [Office of Management and Budget \(OMB\), Memorandum M-24-02, Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure](#).

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

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

### Waivers

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

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

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

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

## Definitions

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

## E. Mandatory Disclosures

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

## F. Adaptive Support

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

## G. Record Retention

### Record Retention Period

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

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

### Types of Records to Retain

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

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

## H. Actions to Address Noncompliance

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

noncompliance on the part of a recipient or subrecipient.

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

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

## I. Audits

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



# Contacts and Appendices

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# Contacts

## A. Program Office

FEMA has assigned Preparedness Officers to each state for HSGP. If you are unsure who your Preparedness Officer is, please contact FEMA Grants News by phone at (800) 368-6498 or by email at [fema-grants-news@fema.dhs.gov](mailto:fema-grants-news@fema.dhs.gov), Monday through Friday, 9 a.m. – 5 p.m.

## B. FEMA Grants News

FEMA Grants News provides general information on all FEMA grant programs and maintains a comprehensive database containing key personnel contact information at the federal, state, and local levels. FEMA Grants News is reachable at [fema-grants-news@fema.dhs.gov](mailto:fema-grants-news@fema.dhs.gov) or (800) 368-6498, Monday through Friday, 9 a.m. – 5 p.m. ET.

## C. Award Administration Division

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

## D. Procurement Under Grants Division

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

## E. FEMA Regional Offices

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

## F. Civil Rights

Consistent with Executive Order 14173, Ending Illegal Discrimination & Restoring Merit-Based Opportunity, the FEMA Integration and Coordination Division (ICD) is responsible for ensuring compliance with and enforcement of federal civil rights obligations in connection with programs and services conducted by FEMA. They are reachable at [fema-ocr@fema.dhs.gov](mailto:fema-ocr@fema.dhs.gov).

## G. Environmental Planning and Historic Preservation

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

## H. Payment and Reporting

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

## I. FEMA GO

For technical assistance with the FEMA GO system, please contact the FEMA GO Helpdesk at [femago@fema.dhs.gov](mailto:femago@fema.dhs.gov) or (877) 585-3242, Monday through Friday, 9 a.m. – 6 p.m. ET.

## J. FEMA Preparedness Toolkit

The FEMA Preparedness Toolkit (PrepToolkit) provides access to tools and resources needed to implement the National Preparedness System and provides a collaborative space for communities completing the Unified Reporting Tool (URT). Recipients complete and submit their Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR), and other required assessments using the PrepToolkit. For assistance, contact [support@preptoolkit.fema.dhs.gov](mailto:support@preptoolkit.fema.dhs.gov).

## K. Preparedness Grants Manual

Recipients seeking guidance on policies and procedures for managing preparedness grants should reference the Preparedness Grants Manual at Preparedness Grants Manual.

# Appendices

## Appendix I: HSGP Allocations

HSGP Programs	FY 2026 Allocation
SHSP	\$394,250,000
UASI	\$584,250,000
OPSG	\$85,500,000
<b>Total</b>	<b>\$1,064,000,000</b>

### A. SHSP Allocations

For FY 2026, DHS/FEMA will distribute SHSP funds based on their risk assessment methodology and legal minimums outlined in the *Homeland Security Act of 2002*, as amended. *THIRA and SPR results do not affect how grant funds are allocated.*

Each state and territory will receive a guaranteed minimum amount:

- All 50 states, Washington, D.C., and Puerto Rico will receive at least 0.35% of the total funds available under Sections 2003 and 2004 of the Homeland Security Act.
- The four territories (American Samoa, Guam, the Northern Mariana Islands, and the U.S. Virgin Islands) will receive at least 0.08% of the total funds available under these sections.

States must include a separate IJ for the NPA focused on Enhancing Election Security (at least 3% minimum spend requirement) and Supporting Border Crisis Response and Enforcement (at least a 10% minimum spend requirement), but there is flexibility on the remaining 17% required to meet the overall 30% minimum spend requirement for the NPAs associated with the SHSP allocation.

### Fiscal Year 2026 State Homeland Security Program Allocations

State/Territory	FY 2026 Allocation	State/Territory	FY 2026 Allocation
Alabama	\$4,362,750	Montana	\$4,362,750
Alaska	\$4,362,750	Nebraska	\$4,362,750
American Samoa	\$997,200	Nevada	\$4,362,750
Arizona	\$4,651,543	New Hampshire	\$4,362,750
Arkansas	\$4,362,750	New Jersey	\$14,820,780
California	\$52,359,684	New Mexico	\$4,362,750

Colorado	\$4,362,750	New York	\$59,188,020
Connecticut	\$4,362,750	North Carolina	\$4,362,750
Delaware	\$4,362,750	North Dakota	\$4,362,750
District of Columbia	\$4,362,750	Northern Mariana Islands	\$997,200
Florida	\$15,118,034	Ohio	\$5,257,671
Georgia	\$6,902,198	Oklahoma	\$4,362,750
Guam	\$997,200	Oregon	\$4,362,750
Hawaii	\$4,362,750	Pennsylvania	\$8,816,599
Idaho	\$4,362,750	Puerto Rico	\$4,362,750
Illinois	\$9,784,372	Rhode Island	\$4,362,750
Indiana	\$4,362,750	South Carolina	\$4,362,750
Iowa	\$4,362,750	South Dakota	\$4,362,750
Kansas	\$4,362,750	Tennessee	\$4,362,750
Kentucky	\$4,362,750	Texas	\$24,517,419
Louisiana	\$4,362,750	U.S. Virgin Islands	\$997,200
Maine	\$4,362,750	Utah	\$4,362,750
Maryland	\$4,672,967	Vermont	\$4,362,750
Massachusetts	\$5,091,328	Virginia	\$8,204,345
Michigan	\$4,362,750	Washington	\$5,091,740
Minnesota	\$4,362,750	West Virginia	\$4,362,750
Mississippi	\$4,362,750	Wisconsin	\$4,362,750
Missouri	\$4,362,750	Wyoming	\$4,362,750
<b>Total</b>	<b>\$394,250,000</b>		

### B. UASI Allocations

For FY 2026, the UASI program will provide funding to high-risk urban areas. Eligibility has been

determined through an analysis of relative risk of terrorism faced by the 100 most populous Metropolitan Statistical Areas (MSA) in the United States, as outlined in the *Homeland Security Act of 2002*, as amended. Detailed information on MSAs is available from the U.S. Census Bureau at [Metropolitan and Micropolitan \(census.gov\)](https://www.census.gov). *It is important to note that results from THIRA/SPR do not impact grant allocations or awards.*

The [Metropolitan Areas Standardization and Protection \(MAPS\) Act of 2021 \(P.L. 117-219\)](#) prohibits automatic updates to core-based statistical areas, which are used to define MSAs, for grantmaking purposes. Any changes require a formal rulemaking process with public notice and comment. If changes become necessary in FY 2026, FEMA will initiate this process as required by the MAPS Act.

The table below lists the UASI allocations for each high-risk urban area based on DHS/FEMA’s risk-informed assessment in accordance with the *Homeland Security Act of 2002*, as amended. Each high-risk urban area, through its state, must include a separate IJ for the NPA “Enhancing Election Security”, which has a required minimum spend of 3%, and “Supporting Border Crisis Response and Enforcement”, which has a 10% minimum spend requirement. *All projects related to these requirements must be included in the separate IJs.* Additionally, the combined funding across all five NPAs must total at least 30% of the area’s overall UASI allocation.

### Fiscal Year 2026 Urban Area Security Initiative Allocations

State/Territory	Funded Urban Area	FY 2026 UASI Allocation
Arizona	Phoenix-Mesa-Chandler, AZ	\$11,512,287
California	Anaheim-Santa Ana-Irvine, CA	\$7,689,327
	Los Angeles-Long Beach-Glendale, CA	\$33,962,648
	Riverside-San Bernardino-Ontario, CA	\$6,530,082
	Sacramento-Roseville-Folsom, CA	\$3,994,615
	San Diego-Chula Vista-Carlsbad, CA	\$16,266,915
	San Francisco-San Jose-Oakland, CA	\$28,731,786
Colorado	Colorado Springs, CO	\$2,757,605
	Denver-Aurora-Lakewood, CO	\$5,790,761
District of Columbia	Washington-Arlington-Alexandria, DC-VA-MD-WV	\$32,167,653
Florida	Jacksonville, FL	\$4,232,660
	Miami-Fort Lauderdale-Pompano Beach, FL	\$13,699,865

	Orlando-Kissimmee-Sanford, FL	\$6,049,562
	Tampa-St. Petersburg-Clearwater, FL	\$6,629,070
Georgia	Atlanta-Sandy Springs-Alpharetta, GA	\$13,166,340
Hawaii	Honolulu, HI	\$5,694,660
Illinois	Chicago-Naperville-Elgin, IL-IN-WI	\$30,990,822
Indiana	Indianapolis-Carmel-Anderson, IN	\$3,050,494
Louisiana	New Orleans-Metairie, LA	\$4,077,142
Maryland	Baltimore-Columbia-Towson, MD	\$6,895,987
Massachusetts	Boston-Cambridge-Newton, MA-NH	\$14,909,697
Michigan	Detroit-Warren-Dearborn, MI	\$7,205,819
Minnesota	Minneapolis-St. Paul-Bloomington, MN-WI	\$8,344,639
Missouri	St. Louis, MO-IL	\$5,535,938
	Kansas City, MO-KS	\$3,708,524
Nevada	Las Vegas-Henderson-Paradise, NV	\$7,671,239
New Jersey	Newark-Jersey City-New Brunswick, NJ-PA	\$32,128,653
New York	New York-White Plains, NY	\$142,481,143
North Carolina	Charlotte-Concord-Gastonia, NC-SC	\$3,862,875
Ohio	Cincinnati, OH-KY-IN	\$3,665,266
	Columbus, OH	\$3,662,688
	Cleveland-Elyria, OH	\$3,837,253
Oregon	Portland-Vancouver-Hillsboro, OR-WA	\$5,539,967
Pennsylvania	Philadelphia-Camden-Wilmington, PA-NJ-DE-MD	\$16,601,884
	Pittsburgh, PA	\$4,185,597

Tennessee	Nashville-Davidson--Murfreesboro--Franklin, TN	\$3,785,734
Texas	Austin-Round Rock-Georgetown, TX	\$3,332,487
	Dallas-Fort Worth-Arlington, TX	\$15,462,065
	Houston-The Woodlands-Sugar Land, TX	\$23,347,667
	San Antonio-New Braunfels, TX	\$6,291,586
Virginia	Richmond, VA	\$3,099,953
	Virginia Beach-Norfolk-Newport News, VA-NC	\$7,802,388
Washington	Seattle-Tacoma-Bellevue, WA	\$11,212,216
Wisconsin	Milwaukee-Waukesha, WI	\$2,684,441
<b>Total</b>	<b>\$584,250,000</b>	

### C. OPSG Allocations

For FY 2026, DHS/FEMA will award OPSG funds based on two main factors: the risk to border security and the anticipated effectiveness of proposed projects. The OPSG risk assessment identifies potential threats to border security, guiding the distribution of funds to areas with the highest need. Eligible applicants are local, and tribal law enforcement agencies located along the U.S. borders.

For OPSG, "risk" refers to the potential for adverse outcomes, assessed by evaluating threats, vulnerabilities, and consequences associated with specific incidents or events. The risk model used to allocate OPSG funds considers the potential risk that certain threats pose to border security and estimates the relative risk faced by a given area. In evaluating threats, DHS/CBP considers intelligence, situational awareness, criminal trends, and statistical data specific to each of the border sectors, and the potential impacts that these threats pose to the security of the border area. For vulnerability and consequence, DHS/CBP considers the expected impact and consequences of successful border events occurring in specific areas. The effectiveness of proposed investments is evaluated based on the subrecipient's investment strategy, budget, collaboration, and past performance.

### Fiscal Year 2026 Operation Stonegarden Eligible Allocations

State/Territory	FY 2026 Allocation	State/Territory	FY 2026 Allocation
Alabama	\$475,000	Montana	\$1,702,000

Alaska	\$1,650,000	Nebraska	\$0
American Samoa	\$0	Nevada	\$0
Arizona	\$11,969,100	New Hampshire	\$16,719
Arkansas	\$0	New Jersey	\$0
California	\$13,400,000	New Mexico	\$3,100,000
Colorado	\$0	New York	\$2,512,000
Connecticut	\$0	North Carolina	\$0
Delaware	\$0	North Dakota	\$1,689,781
District of Columbia	\$0	Northern Mariana Islands	\$0
Florida	\$2,767,000	Ohio	\$750,000
Georgia	\$100,000	Oklahoma	\$0
Guam	\$0	Oregon	\$0
Hawaii	\$0	Pennsylvania	\$64,500
Idaho	\$450,000	Puerto Rico	\$1,540,000
Illinois	\$0	Rhode Island	\$0
Indiana	\$0	South Carolina	\$0
Iowa	\$0	South Dakota	\$0
Kansas	\$0	Tennessee	\$0
Kentucky	\$0	Texas	\$34,800,900
Louisiana	\$1,083,000	U.S. Virgin Islands	\$90,000
Maine	\$1,600,000	Utah	\$0
Maryland	\$0	Vermont	\$25,000
Massachusetts	\$0	Virginia	\$0
Michigan	\$2,381,000	Washington	\$1,455,000

Minnesota	\$1,094,000	West Virginia	\$0
Mississippi	\$785,000	Wisconsin	\$0
Missouri	\$0	Wyoming	\$0
<b>Total</b>			<b>\$85,500,000</b>

*\*Eligibility does not guarantee grant funding*

## Appendix 2: Allowable Costs

### A. Allowable Cost Matrix for SHSP, UASI, and OPSG

The following matrix lists allowable cost activities across cost categories described above and below. The [Preparedness Grants Manual](#) includes additional information on allowable costs. Recipients and subrecipients must follow all applicable requirements in [2 C.F.R. Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#). HSGP funds may be used to cover the costs for evaluating the impact of these grants on the state or urban area's core capabilities and capability gaps. This list is not exhaustive, therefore, if there are any questions regarding allowable costs, please contact the appropriate FEMA HQ Preparedness Officer.

Allowable Program Activities	SHSP	UASI	OPSG
<b>Allowable Planning Costs</b>			
Developing hazard/threat-specific annexes	Y	Y	N
Developing and implementing homeland security support programs and adopting ongoing DHS/FEMA national initiatives	Y	Y	N
Developing related terrorism and other catastrophic event prevention activities	Y	Y	N
Developing and enhancing plans and protocols	Y	Y	N
Developing or conducting assessments	Y	Y	N
Hiring full- or part-time staff or contract/consultants to assist with planning, engagement, and volunteer management activities	Y	Y	N
Materials required to conduct planning, engagement, and volunteer management activities	Y	Y	N
Travel/per diem related to planning, engagement, and volunteer management activities	Y	Y	Y
Overtime and backfill costs (in accordance with operational Cost Guidance)	Y	Y	Y
Issuance of Western Hemisphere Travel Initiative-compliant Tribal identification cards	Y	N	N
Activities to achieve planning inclusive of people with disabilities and others with access and functional needs and limited English proficiency.	Y	Y	N

<b>Allowable Program Activities</b>	<b>SHSP</b>	<b>UASI</b>	<b>OPSG</b>
Coordinating with Citizen Corps Councils for public information/education and development of volunteer programs	Y	Y	N
Coordinating with and material support to Citizen Corps Councils and local firehouses for the establishment, training and maintenance of CERTs	Y	Y	N
Updating governance structures and processes and plans for emergency communications	Y	Y	N
Developing and reviewing and revising of continuity of operations plans	Y	Y	N
Developing and reviewing and revising of the THIRA/SPR and continuity of operations plans	Y	Y	N
<b>Allowable Organizational Activities</b> Note: 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.			
Program management	Y	Y	N
Developing whole community partnerships	Y	Y	N
Structures and mechanisms for sharing information between the public and private sector	Y	Y	N
Implementing models, programs, and workforce enhancement initiatives	Y	Y	N
Tools, resources, and activities that facilitate shared situational awareness between the public and private sectors	Y	Y	N
Operational support	Y	Y	N
Utilizing standardized resource management concepts	Y	Y	N
Responding to an increase in the threat level under the National Terrorism Advisory System (NTAS), or needs resulting from a National Special Security Event	Y	Y	N
Reimbursement for select operational expenses associated with increased security measures at critical infrastructure sites incurred (up to 50% of the allocation)	Y	Y	Y

<b>Allowable Program Activities</b>	<b>SHSP</b>	<b>UASI</b>	<b>OPSG</b>
Overtime for information, investigative, and intelligence sharing activities (up to 50% of the allocation)	Y	Y	Y
Hiring new staff positions/contractors/consultants for participation in information/intelligence analysis and sharing groups or fusion center activities (up to 50% of the allocation).	Y	Y	Y
Hiring or maintaining staff positions/contractors/consultants at SLTT levels to deliver community preparedness training, resources and material to schools, community-based organizations, faith-based institutions and local businesses.	Y	Y	N
Hiring or maintaining staff positions/contractors/consultants to create, support and maintain CERT or Teen CERT	Y	Y	N
Cost of migrating online services to the “.gov” domain	Y	Y	N
<b>Allowable Equipment Categories</b>			
Personal Protective Equipment	Y	Y	Y
Explosive Device Mitigation and Remediation Equipment	Y	Y	N
CBRNE Operational Search and Rescue Equipment	Y	Y	N
Information Technology	Y	Y	Y
Cybersecurity Enhancement Equipment	Y	Y	N
Interoperable Communications Equipment	Y	Y	Y
Detection	Y	Y	Y
Decontamination	Y	Y	N
Medical countermeasures	Y	Y	Y
Power (e.g., generators, batteries, power cells)	Y	Y	Y
CBRNE Reference Materials	Y	Y	N
CBRNE Incident Response Vehicles	Y	Y	N
Terrorism Incident Prevention Equipment	Y	Y	Y
Physical Security Enhancement Equipment	Y	Y	Y

<b>Allowable Program Activities</b>	<b>SHSP</b>	<b>UASI</b>	<b>OPSG</b>
Inspection and Screening Systems	Y	Y	Y
Animal Care and Foreign Animal Disease	Y	Y	N
CBRNE Prevention and Response Watercraft	Y	Y	N
CBRNE Prevention and Response Unmanned Aircraft	Y	Y	N
CBRNE Aviation Equipment	Y	Y	N
CBRNE Logistical Support Equipment	Y	Y	N
Intervention Equipment (e.g., tactical entry, crime scene processing)	Y	Y	Y
Critical emergency supplies	Y	Y	N
General use vehicle acquisition, lease, and rental	N	N	Y
Specialized vehicle acquisition, lease, and rental	Y	Y	Y
Other Authorized Equipment	Y	Y	Y
<b>Allowable Training Costs</b>			
Overtime and backfill for emergency preparedness and response personnel attending DHS/FEMA-sponsored and approved training classes	Y	Y	N
Overtime and backfill expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA training	Y	Y	N
Training workshops and conferences	Y	Y	Y
Activities to achieve training inclusive of people with disabilities and others with access and functional needs and limited English proficiency	Y	Y	N
Full- or part-time staff or contractors/consultants	Y	Y	Y
Travel	Y	Y	Y
Supplies	Y	Y	N
Instructor certification/re-certification	Y	Y	N
Coordination with Citizen Corps Councils and CERT in conducting	Y	Y	N

<b>Allowable Program Activities</b>	<b>SHSP</b>	<b>UASI</b>	<b>OPSG</b>
training exercises			
Preparedness training for community preparedness initiatives and programs	Y	Y	N
Interoperable communications training	Y	Y	N
Activities to achieve planning inclusive of people with limited English proficiency	Y	Y	N
Immigration enforcement training	Y	Y	Y
<b>Allowable Exercise Related Costs</b>			
Design, Develop, Conduct, and Evaluate an Exercise	Y	Y	N
Full- or part-time staff or contractors/consultants	Y	Y	N
Overtime and backfill costs, including expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA exercises	Y	Y	N
Implementation of Homeland Security Exercise and Evaluation Program (HSEEP)	Y	Y	N
Activities to achieve exercises inclusive of people with disabilities and others with access and functional needs	Y	Y	N
Travel	Y	Y	N
Supplies	Y	Y	N
Interoperable communications exercises	Y	Y	N
Activities to achieve planning inclusive of people with limited English proficiency	Y	Y	N
<b>Allowable M&amp;A Costs</b>			
Hiring full- or part-time staff or contractors/consultants to assist with the management of the respective grant program, application requirements, and compliance with reporting and data collection requirements	Y	Y	<b>Y</b>
Development of operating plans for information collection and processing necessary to respond to DHS/FEMA data calls	Y	Y	<b>Y</b>

<b>Allowable Program Activities</b>	<b>SHSP</b>	<b>UASI</b>	<b>OPSG</b>
Overtime and backfill costs	Y	Y	Y
Travel	Y	Y	Y
Meeting related expenses	Y	Y	Y
Authorized office equipment	Y	Y	Y
Recurring expenses such as those associated with cell phones and faxes during the period of performance of the grant program	Y	Y	N
Leasing or renting space for newly hired personnel during the period of performance of the grant program	Y	Y	N
Conducting activities related to evaluating project effectiveness for HSGP-funded projects	Y	Y	Y
<b>LETPA Costs</b>			
Integration and interoperability of systems and data, such as computer aided dispatch (CAD) and record management systems (RMS), to facilitate the collection	Y	Y	N
Maturation, enhancement, and sustainment of designated state and major Urban Area fusion centers, including information sharing and analysis, threat recognition, terrorist interdiction, and intelligence analyst training and salaries (subject to certain conditions)	Y	Y	N
Regional counterterrorism training programs for small, medium, and large jurisdictions to exchange information and discuss the current threat environment, lessons learned, and best practices to help prevent, protect against, and mitigate acts of terrorism	Y	Y	N
Coordination of regional full-scale training exercises (federal, state, and local law enforcement participation) focused on terrorism-related events	Y	Y	N
Law enforcement Chemical, Biological, Radiological, Nuclear, and high yield Explosives detection and response capabilities, such as bomb detection/disposal capability development, sustainment, or enhancement, including canine teams, robotics platforms, and x-ray technology	Y	Y	N
Coordination between fusion centers and other operational analytic and investigative efforts	Y	Y	N

<b>Allowable Program Activities</b>	<b>SHSP</b>	<b>UASI</b>	<b>OPSG</b>
Implementation, maintenance, and sustainment of the Nationwide Suspicious Activity Reporting Initiative	Y	Y	N
Implementation of the "If You See Something, Say Something <sup>®</sup> " campaign	Y	Y	N
Increase physical security, through law enforcement personnel and other protective measures, by implementing preventive and protective measures at critical infrastructure locations	Y	Y	N

### B. SHSP and UASI Other Direct Costs

Recipients must comply with all the requirements in [2 C.F.R. Part 200 \(Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards\)](#). In general, recipients should consult with their FEMA HQ Preparedness Officer before making any investment that does not clearly meet the allowable expense criteria. Funding guidelines established within this section support four of the five mission areas—Prevention, Protection, Mitigation, and Response—and associated core capabilities within the Goal. While Recovery is part of the Goal, it is not explicitly part of the HSGP. Allowable investments made in support of the national priorities, as well as other capability-enhancing projects must have a nexus to terrorism preparedness and fall into the categories of planning, organization, exercises, training, or equipment, aligned to building capability, closing capability gaps, and/or sustaining capabilities, as defined by CPG 201: THIRA/SPR Guide—3rd Edition ([Comprehensive Preparedness Guide \(CPG\) 201, 3rd Edition \(fema.gov\)](#)). Recipients are encouraged to use grant funds

for evaluating grant-funded project effectiveness and return on investment. FEMA encourages recipients to provide the results of that analysis to FEMA.

#### *a. Planning*

SHSP and UASI funds may be used for a range of emergency preparedness and management planning activities, such as those associated with the development, review, and revision of the THIRA, SPR, continuity plans, and other planning activities that support the Goal and placing an emphasis on updating and maintaining a current Emergency Operations Plan (EOP) that conforms to the guidelines outlined in [Comprehensive Preparedness Guide \(CPG\) 101 v3](#). Planning efforts can also include 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.

Additionally, SHSP and UASI funds may be used for planning efforts related to state court cybersecurity, 911 call capabilities, alert and warning capabilities, and implementation of the REAL ID Act (Pub. L. No. 109-13).

#### *b. Organization*

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

States and high-risk urban areas must justify proposed expenditures of SHSP or UASI funds to support

organization activities within their IJ submission. Organizational activities include:

1. Program management.
2. Development of whole community partnerships, through groups such as Citizen Corp Councils.
3. Structures and mechanisms for information sharing between the public and private sector.
4. Implementing models, programs, and workforce enhancement initiatives to address ideologically inspired radicalization to violence in the homeland.
5. Tools, resources, and activities that facilitate shared situational awareness between the public and private sectors.
6. Operational Support.
7. Utilizing standardized resource management concepts such as typing, inventorying, organizing, and tracking to facilitate the dispatch, deployment, and recovery of resources before, during, and after an incident.
8. Responding to an increase in the threat level under the NTAS or needs resulting from a National Special Security Event.
9. Paying salaries and benefits for personnel to serve as qualified Intelligence Analysts. Per the *Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act (PRICE Act)*, Pub. L. No. 110-412, § 2, codified in relevant part, as amended, at 6 U.S.C. § 609(a), SHSP and UASI funds may be used to hire new staff and/or contractor positions to serve as intelligence analysts to enable information/intelligence sharing capabilities, as well as support existing intelligence analysts previously covered by SHSP or UASI funding. See 6 U.S.C. § 609(a). To be hired as an intelligence analyst, staff and/or contractor personnel must meet at least one of the following criteria:
  - Complete training to ensure baseline proficiency in intelligence analysis and production within six months of being hired; and/or,
  - Previously served as an intelligence analyst for a minimum of two years either in a federal intelligence agency, the military, or state and/or local law enforcement intelligence unit.
10. All fusion center analytical personnel must demonstrate qualifications that meet or exceed competencies identified in the Common Competencies for state, local, and tribal intelligence analysts, which outlines the minimum categories of training needed for intelligence analysts. A certificate of completion of such training must be on file with the SAA and must be made available to the recipient's respective FEMA HQ Preparedness Officer upon request; and
11. Migrating online services to the ".gov" internet domain.

All SAAs are allowed to use up to 50% of their SHSP funding, and all high-risk urban areas are allowed to use up to 50% of their UASI funding, for personnel costs per 6 U.S.C. § 609(b)(2)(A). 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. Personnel expenses may include, but are not limited to training and exercise coordinators, program managers and planners, intelligence analysts, and SWICs.

At the request of a recipient, the FEMA Administrator (or their designee) may grant a waiver of this 50% limitation under 6 U.S.C. § 609(b)(2)(B). Requests for waivers to the personnel cap must be submitted by the authorized representative of the SAA to FEMA in writing on official letterhead, with the following information:

1. Documentation explaining why the cap should be waived.
2. Conditions under which the request is submitted; and

3. The budget and method of calculation of personnel costs both in percentages of the grant award and in total dollar amount.

Please see [IB 421b, Clarification on the Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008 \(Public L. No. 110–412 – the PRICE Act\)](#), dated October 30, 2019, for additional information on the waiver request process.

### *c. Equipment*

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

The 21 allowable prevention, protection, mitigation, and response equipment categories for HSGP are listed on the [Authorized Equipment List](#) (AEL). Some equipment items require prior approval from FEMA before obligation or purchase of the items. Please reference the grant notes for each equipment item to ensure prior approval is not required or to ensure prior approval is obtained if necessary. Recipients and subrecipients may purchase equipment not listed on the AEL, but only if they first seek and obtain prior approval from FEMA.

Unless otherwise stated, all equipment must meet all mandatory regulatory and/or FEMA-adopted standards to be eligible for purchase using these funds. In addition, recipients will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment. Investments in emergency communications systems and equipment must meet applicable [SAFECOM Guidance on Emergency Communications Grants](#) (SAFECOM Guidance) recommendations. Such investments must be coordinated with the SWIC and the State Interoperability Governing Body to ensure interoperability and long-term compatibility. For personal protective equipment (PPE), recipients are encouraged to give procurement preference to domestic manufacturers of PPE or PPE raw materials to the maximum practicable and allowed by law.

Grant funds may be used for the procurement of medical countermeasures. Procurement of medical countermeasures must be conducted in collaboration with state, city, or local health departments that administer federal funds from the Department of Health and Human Services for this purpose and with existing Metropolitan Medical Response System committees where available, to sustain their long-term planning for appropriate, rapid, and local medical countermeasures, including antibiotics and antidotes for nerve agents, cyanide, and other toxins. Procurement must have a sound threat-based justification with an aim to reduce the consequences of mass casualty incidents during the first crucial hours of a response. Prior to procuring pharmaceuticals, recipients must have in place an inventory management plan to avoid large periodic variations in supplies due to coinciding purchase and expiration dates. Recipients are encouraged to enter into rotational procurement agreements with vendors and distributors. Purchases of pharmaceuticals must include a budget for the disposal of expired drugs within each fiscal year's Period of Performance (POP) for HSGP. The cost of disposal cannot be carried over to another FEMA grant or grant period.

EMS electronic patient care data systems should comply with the most current data standard of the [National Emergency Medical Services Information System](#).

Recipients are reminded that school hardening is an eligible activity under SHSP and UASI. School hardening measures include but are not limited to:

1. Bullet resistant doors and glass.
2. Hinge-locking mechanisms.
3. Immediate notification to emergency 911 systems.
4. Mechanisms that provide real time actionable intelligence directly to law enforcement and first responders.
5. Installation of distraction devices or other countermeasures administered by law enforcement; and
6. Other measures are determined to provide significant improvements to schools' physical security.

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

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

### 1. General Purpose Equipment

HSGP allows expenditures on general purpose equipment if it aligns to and supports one or more core capabilities identified in the Goal and has a nexus to terrorism preparedness. General purpose equipment, like all equipment funded under the HSGP, must be sharable through the EMAC3F<sup>5</sup> and allowable under 6 U.S.C. § 609, and any other applicable provision of the *Homeland Security Act of 2002*, as amended.

Examples of such general-purpose equipment may include:

- Law enforcement/general use vehicles (OPSG only);
- Emergency medical services, equipment and vehicles;
- Fire service equipment and vehicles, to include hose, pump accessories, and foam concentrate for specialized chemical/biological/radiological/nuclear/explosive (CBRNE) response;
- Interoperability of data systems, such as CAD and RMS; and
- Office equipment for staff<sup>6</sup> engaged in homeland security program activity.

### 3. Construction and Renovation

Construction and renovation costs to achieve capability targets related to preventing, preparing for, protecting against, or responding to acts of terrorism are allowed under this program. For construction and renovation costs to be allowed, they must be specifically approved by DHS/FEMA in writing prior to the use of any program funds. Limits on the total amount of grant funding that may be used for construction or renovation may apply. Additionally, recipients are required to submit [SF-424C and SF-424D](#).

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

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<sup>5</sup> Except for American Samoa and the Commonwealth of the Northern Mariana Islands, which are not required to belong to EMAC at this time.

<sup>6</sup> This applies to all homeland security personnel and is not limited to M&A staff, and costs are to be captured outside the cap on M&A costs.

#### *d. Training and Exercises*

Training and exercise costs are allowed under this program only as described in this funding notice and the [Preparedness Grants Manual](#). Recipients are encouraged to consider tuition-free courses offered by FEMA first, before investing in training. For more information and a catalog of courses please refer to the [National Preparedness Course Catalog at the National Training and Education Division \(NTED\)](#). Allowable training-related costs under HSGP include the establishment, support, conduct, and attendance of training specifically identified under the SHSP and UASI program and/or in conjunction with emergency preparedness training by other federal agencies (e.g., HHS and Department of Transportation [DOT]). Training conducted using HSGP funds should address a performance gap identified through an Integrated Preparedness Plan (IPP) or other assessments (e.g., National Emergency Communications Plan Goal Assessments) and contribute to building a capability that will be evaluated through a formal exercise. When developing new courses, recipients are encouraged to apply the Analysis, Design, Development, Implementation, and Evaluation model of instructional design.

#### 4. Law Enforcement Readiness

SHSP or UASI grant funds may be requested and may be approved on a case-by-case basis for immigration enforcement training in support of the border security mission. Requests for training will be evaluated on a case-by-case basis and can only be used for certification in the section 287(g) program provided by DHS/ICE. SHSP or UASI subrecipients with agreements under section 287(g) of the *Immigration and Nationality Act (INA)* (8 U.S.C. § 1357(g)) to receive delegated authority for immigration enforcement within their jurisdictions may also be reimbursed for section 287(g) related operational activities with approval from FEMA on a case-by-case basis.

#### *e. Maintenance and Sustainment*

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

#### *f. Travel*

Domestic travel costs are allowed under this program, as provided for in this NOFO. International travel is not an allowable cost under this program unless approved in advance by DHS/FEMA. See the Allowable Cost Matrix above for more information on allowable travel activities under SHSP and UASI.

#### *g. Personnel*

Personnel hiring, overtime, and backfill expenses are permitted under this grant to perform allowable HSGP planning, organization, training, exercise, and equipment activities. All recipients and subrecipients of HSGP funds, including SHSP and UASI allocations, may not use more than 50% of their awards to pay for personnel activities unless a waiver is approved by FEMA. For more information on the 50% personnel cap, please see FEMA [IB 421b](#), Clarification on the *Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008* (Public Law 110-412) – the PRICE Act.

HSGP funds may not be used to support the hiring of any personnel to fulfill traditional public health and safety duties nor to supplant traditional public health and safety positions and responsibilities. The following definitions apply to personnel costs:

- Hiring. State and local entities may use grant funding to cover the salary of newly hired personnel who are exclusively undertaking allowable FEMA grant activities as specified in this guidance. This may not

include new personnel who are hired to fulfill any non-FEMA HSGP program activities under any circumstances. Hiring will always result in a net increase of Full Time Equivalent (FTE) employees.

- Overtime. These expenses are limited to the additional costs that result from personnel working over and above 40 hours of weekly work time as the direct result of their performance of FEMA-approved activities specified in this guidance. Overtime associated with any other activity is not eligible.
- Backfill-Related Overtime. Also called “Overtime as Backfill,” these expenses are limited to overtime costs that result from personnel who are working overtime (as identified above) to perform the duties of other personnel who are temporarily assigned to FEMA-approved activities outside their core responsibilities. Neither overtime nor backfill expenses are the result of an increase of FTE employees.
- Supplanting. Grant funds will be used to supplement existing funds and will not replace (supplant) funds that have been appropriated for the same purpose. Applicants or recipients may be required to supply documentation certifying that a reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

### 1. Operational Overtime Costs

Supporting efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism and other catastrophic events, operational overtime costs are allowable for increased protective security measures at critical infrastructure sites or other high-risk locations and to enhance public safety during mass gatherings and high-profile events. In that regard, HSGP recipients are urged to consider using grant funding to support soft target preparedness activities. SHSP or UASI funds may be used to support select operational expenses associated with increased security measures in the authorized categories cited in the table below, but this table is not exhaustive. FEMA retains the discretion to approve other types of requests that do not fit within one of the categories of the table.

### Authorized Operational Overtime Categories

Category	Description
<b>1. National Terrorism Advisory System (NTAS)</b>	Security measures in response to an increase in the threat level under the NTAS to an “elevated” or “imminent” alert status. FEMA Information Bulletin No. 367, <a href="#">Impact of National Terrorism Advisory System on Homeland Security Grant Programs</a> , remains applicable; therefore, advance authorization from FEMA is not required. Refer to <a href="#">National Terrorism Advisory System   Homeland Security (dhs.gov)</a> for additional information on the NTAS.
<b>2. National Security Special Event (NSSE)</b>	Security measures for a <u>designated</u> NSSE. NSSEs are events of national or international significance deemed by DHS to be a potential target for terrorism or other criminal activity.
<b>3. Special Event Assessment Rating (SEAR) Level 1 through Level 4 Events</b>	Security measures required for SEAR Level 1 through Level 4 events as designated by DHS and included in the DHS National Special Events List, as defined below: <ul style="list-style-type: none"> <li>▪ SEAR 1: A significant event with national and/or international importance that may require extensive federal interagency support.</li> <li>▪ SEAR 2: A significant event with national and/or international importance that may require some level of federal interagency support.</li> <li>▪ SEAR 3: An event of national and/or international importance that requires</li> </ul>

Category	Description
	<p>only limited federal support.</p> <ul style="list-style-type: none"> <li>▪ SEAR 4: An event with limited national importance that is managed at state and local level.</li> </ul> <p>NOTE: In cases where a threat of terrorism can be associated with a SEAR Level 5 event, the event planners should coordinate with their state or territory Homeland Security Advisor to seek re-adjudication of the SEAR rating. Operational overtime for security measures associated with such events will be considered for approval by FEMA if re-adjudication results in a SEAR 1 through 4 rating.</p>
<b>4. States of Emergency</b>	<p>Declarations of states of emergency by the Governor <u>associated with a terrorism-related threat or incident</u>. This excludes Presidentially declared major disasters or emergencies where federal funding support for the proposed grant-funded activity is made available through the FEMA Public Assistance program or other federal disaster grants.</p>
<b>5. National Critical Infrastructure Prioritization Program (NCIPP)</b>	<p>Protection of Level 1 and Level 2 facilities identified through DHS's NCIPP <u>based on a terrorism-related threat</u> to critical infrastructure.</p>
<b>6. Directed Transit Patrols</b>	<p>Targeted security patrols in airports and major transit hubs <u>based on a terrorism-related threat</u> to transportation systems.</p>
<b>7. Other Related Personnel Overtime Costs</b>	<p>Overtime costs may be authorized for personnel assigned to directly support any of the security activities relating to the categories above. Examples include firefighters and emergency medical services personnel; public works employees who may be responsible for installing protective barriers and fencing; public safety personnel assigned to assist with event access and crowd control; emergency communications specialists; backfill and overtime for staffing state or major urban area fusion centers; state Active Duty National Guard deployments to protect critical infrastructure sites, including all resources that are part of the standard National Guard deployment package (note: consumable costs, such as fuel expenses, are not allowed except as part of the standard National Guard deployment package); contract security services for critical infrastructure sites; participation in Regional Resiliency Assessment Program activities, increased border security activities in coordination with USBP, etc.</p>
<b>8. Operational Support to a Federal Agency</b>	<p>Overtime costs are allowable for personnel to participate in information, investigative, and intelligence sharing activities related to homeland security/terrorism preparedness and specifically requested by a federal agency.</p>

Category	Description
	<p>Allowable costs are limited to overtime associated with federally requested participation in eligible activities, including anti-terrorism task forces, Joint Terrorism Task Forces (JTTFs), Area Maritime Security Committees (as required by the <i>Maritime Transportation Security Act of 2002</i>), DHS Border Enforcement Security Task Forces, and Integrated Border Enforcement Teams. In addition, reimbursement for operational overtime law enforcement activities related to combating transnational crime organizations in support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism is an allowable expense under SHSP and UASI on a case-by-case basis. Grant funding can only be used in proportion to the federal man-hour estimate and only after funding for these activities from other federal sources (i.e., FBI JTTF payments to state and local agencies) has been exhausted.</p>
<p><b>9. Response to Catastrophic Incidents that are Acts of Terrorism</b></p>	<p>Operational overtime is allowable for responding to acts of terrorism. This includes overtime accrued during the immediate response to events, such as mass casualty acts of targeted violence or other activities where the act (i) is dangerous to human life or potentially destructive of critical infrastructure or key resources; and (ii) is a violation of the criminal laws of the United States or of any State or other subdivision of the United States, and the act appears to be intended to coerce civilian populations, influence the policy of a government by intimidation or coercion, or affect the conduct of a government by mass destructions, assassination, or kidnapping.</p>

All allowable operational overtime costs are also subject to the administration requirements outlined in the following subsection.

## 2. Administration of Operational Overtime Requests

- Except for an elevated NTAS alert, SHSP or UASI funds may only be spent for operational overtime costs upon prior written approval by FEMA. The SAA must submit operational overtime requests in writing to its assigned FEMA HQ Preparedness Officer. FEMA will consider requests for special event activities up to one year in advance. However, such requests must be within the award's current POP and must not result in the need for a request to extend the period of performance. SAAs should contact FEMA Grants News by e-mail at [fema-grants-news@fema.dhs.gov](mailto:fema-grants-news@fema.dhs.gov) or by phone at (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET, for clarification.
- All operational overtime requests must clearly explain how the request meets the criteria of one or more of the categories listed in the table above. Requests must address the threat environment as it relates to the event or activity requiring operational overtime support and explain how overtime activity is responsive to the threat. Request letters sent to FEMA must be UNCLASSIFIED but may be labeled "For Official Use Only." If explaining the threat will require the sharing of classified information, the letter should state that fact. FEMA will then plan for the sharing of classified information through official channels.
- Post-event operational overtime requests will only be considered on a case-by-case basis, where it is demonstrated that exigent circumstances prevented submission of a request in advance of the event

or activity.

- Under no circumstances may FEMA grant funding be used to pay for costs already supported by funding from another federal source.
- States with UASI jurisdictions can use funds retained at the state level to reimburse eligible operational overtime expenses incurred by the state (per the above guidance limitations). Any UASI funds retained by the state must be used in direct support of the high-risk urban area. States must provide documentation to the UAWG and FEMA upon request demonstrating how any UASI funds retained by a state would directly support the high-risk urban area.
- FEMA will consult and coordinate with appropriate DHS components as necessary to verify information used to support operational overtime requests.

#### *h. Secure Identification*

Secure identification costs are allowed under this program. SHSP funds may be used to support the implementation activities associated with the Western Hemisphere Travel Initiative (WHTI), including the issuance of WHTI-compliant tribal identification cards.

#### *i. Multiple Purpose or Dual-Use of Funds*

Please see the [Preparedness Grants Manual](#) for information on multiple purposes of dual use of funds under SHSP and UASI.

### C. OPSG Other Direct Costs

Recipients must comply with all the requirements in 2 C.F.R. Part 200 (*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*). In general, recipients should consult with their FEMA HQ Preparedness Officer before making any investment that does not clearly meet the allowable expense criteria. Funding guidelines established within this section support four of the five mission areas—Prevention, Protection, Mitigation, and Response—and associated core capabilities within the Goal. While Recovery is part of the Goal, it is not explicitly part of the HSGP. Allowable investments made in support of the national priorities, as well as other capability-enhancing projects must have a nexus to terrorism preparedness and fall into the categories of planning, organization, exercises, training, or equipment, aligned to building capability, closing capability gaps, and/or sustaining capabilities, as defined by CPG 201: THIRA/SPR Guide—3rd Edition ([Comprehensive Preparedness Guide \(CPG\) 201, 3rd Edition \(fema.gov\)](#)). Recipients are encouraged to use grant funds for evaluating grant-funded project effectiveness and return on investment. FEMA encourages recipients to provide the results of that analysis to FEMA.

#### *a. Planning*

Planning costs are allowed under this program only as described in this funding notice. See the Allowable Cost Matrix above for more information on allowable planning activities for OPSG.

#### *b. Organization*

Organization costs are allowed under this program only as described in this funding notice and the [Preparedness Grants Manual](#). See the Allowable Cost Matrix above for more information on allowable organizational activities for OPSG.

#### *c. Equipment*

Equipment costs are allowed under this program only as described in this funding notice and

the [Preparedness Grants Manual](#).

OPSG equipment is intended to be incidental to the enhanced border security operations being performed. The grant is not intended to be used to outfit or supply general equipment to SLTT law enforcement agencies. Equipment must be relatable to and justified by the operational benefit it will provide. Each appropriate OPSG sector coordinator is required to keep an inventory of OPSG purchased equipment that includes at a minimum: 1) grant funding year; 2) purchase amount; 3) purchase date; 4) purchase quantity; 5) equipment ID; 6) source of funding for the property, including the Federal Award Identification Number; 7) who holds title to the property; 8) federal share percent of the property; 9) location of the property; 10) use and condition of the property; 11) disposal date; and 12) brief disposal justification information and sale price if sold. Each Operations Order/FRAGO will require that each friendly force submit the equipment inventory for each Operations Order/FRAGO submission.

- **Equipment Marking.** Because equipment purchased with OPSG funding is intended to be used to support OPSG activities, it may be appropriately marked to ensure its ready identification and primary use for that purpose. When practicable, any equipment purchased with OPSG funding should be prominently marked as follows: "Purchased with DHS funds for Operation Stonegarden Use."
- **Fuel Cost and Mileage Reimbursement.** There is no cap for reimbursement of fuel or mileage costs in support of operational activities. Subrecipients and friendly forces may not claim reimbursements for both mileage and fuel/maintenance for the same equipment at the same time.
- **Vehicle and Equipment Acquisition, Including Leasing and Rentals.** Allowable purchases under OPSG include patrol vehicles and other mission-specific equipment whose primary purpose is to increase operational capabilities on or near a border nexus in support of approved border security operations. A detailed justification must be submitted to the respective FEMA HQ Preparedness Officer prior to purchase.
- **Medical Emergency Countermeasures.** Allowable purchases under OPSG include narcotic antagonist pharmaceuticals, detection and identification equipment, safe storage and transportation, personnel protective equipment, and initial equipment training, as reflected in the AEL.

### 1. Requirements for sUAS

sUAS are allowable under the HSGP. See the [Preparedness Grants Manual](#) for more information.

### 2. General Purpose Equipment

HSGP allows expenditures on general purpose equipment if it aligns to and supports one or more core capabilities identified in the Goal and has a nexus to terrorism preparedness. General purpose equipment, like all equipment funded under the HSGP, must be sharable through the EMAC5F<sup>(1)</sup> and allowable under 6 U.S.C. § 609, and any other applicable provision of the *Homeland Security Act of 2002*, as amended.

Examples of such general-purpose equipment may include:

- Law enforcement/general use vehicles (OPSG only).
- Emergency medical services, equipment and vehicles.
- Fire service equipment and vehicles, to include hose, pump accessories, and foam concentrate for specialized chemical/biological/radiological/nuclear/explosive (CBRNE) response.
- Interoperability of data systems, such as CAD and RMS.
- Office equipment for staff<sup>7</sup> engaged in homeland security program activity.

<sup>7</sup> This applies to all homeland security personnel and is not limited to M&A staff, and costs are to be captured outside the cap on M&A costs.

#### 4. Construction and Renovation

OPSG funds may not be used for any construction.

##### *d. Training and Exercises*

Training and exercise costs are allowed under this program only as described in this funding notice and the [Preparedness Grants Manual](#) (e.g., related to EHP compliance). Recipients are encouraged to consider tuition-free courses offered by FEMA first, before investing in training. For more information and a catalog of courses please refer to the [National Preparedness Course Catalog at NTED](#).

##### 1. Law Enforcement Readiness

OPSG grant funds may be used to increase operational, material, and technological readiness of SLTT law enforcement agencies. The Delegation of Immigration Authority, Section 287(g) of the *Immigration and Nationality Act (INA)* program allows a state or local law enforcement entity to enter into a partnership with ICE, under a joint Memorandum of Agreement (MOA), to receive delegated authority for immigration enforcement within their jurisdictions.

OPSG grant funds may be requested and may be approved on a case-by-case basis for immigration enforcement training in support of the border security mission. Requests for training will be evaluated on a case-by-case basis and can only be used for certification in the section 287(g) program provided by DHS/ICE. OPSG subrecipients with agreements under section 287(g) of the *INA* (8 U.S.C. § 1357(g)) to receive delegated authority for immigration enforcement within their jurisdictions may also be reimbursed for section 287(g) related operational activities with approval from FEMA on a case-by-case basis. For OPSG, subrecipients must be authorized by USBP Headquarters and Sectors, and operational activities must be coordinated through a USBP Sector.

##### *e. Maintenance and Sustainment*

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

##### *f. Travel*

Domestic travel costs are allowed under this program, as provided for in this NOFO and in the [Preparedness Grants Manual](#). International travel is not an allowable cost under this program unless approved in advance by DHS/FEMA. See the Allowable Cost Matrix in [Appendix 2: Allowable Costs](#) for more information on allowable travel activities under OPSG.

##### *g. Personnel*

Personnel hiring, overtime, and backfill expenses are permitted under this grant to perform allowable HSGP planning, organization, training, exercise, and equipment activities. Under OPSG, overtime costs are allowable only in so far as they meet the intent of the program. All recipients and subrecipients of HSGP funds, including OPSG allocations, may not use more than 50% of their awards to pay for personnel activities unless a waiver is approved by FEMA. For more information on the 50% personnel cap, please see FEMA [IB 421b](#), *Clarification on the Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008 (Public Law 110-412 – the PRICE Act)* and [FEMA IB 563, Price Act Waivers for FY 2025 Homeland Security Grant Program – Operation Stonegarden Recipients and Subrecipients](#).

Further, changes in scope or objective also require FEMA's prior written approval pursuant to 2 C.F.R. § 200.308(f)(1). If the cost changes are allowable under the grant, a FRAGO must be submitted to Homeland Security Information Network (HSIN) to obtain FEMA's prior written approval of such changes in accordance with 2 C.F.R. § 200.308(f)(1). These modifications will be annotated in the annex section of the FRAGO.

OPSG funds may be used for domestic travel and *per diem*, including costs associated with the deployment/redeployment of personnel to border areas and for travel associated with law enforcement entities assisting other local jurisdictions in law enforcement activities. In addition, allowable costs include supporting up to six-month deployment of law enforcement personnel to critical Southwest Border locations for operational activities (travel costs must be in accordance with applicable travel regulations). OPSG funds may be used to pay additional current part-time law enforcement personnel salaries to bring them to temporary full-time status. OPSG funds may support a Governor's request to activate, deploy, or redeploy specialized National Guard Units/Package and/or elements of state law enforcement serving as friendly forces to increase or augment specialized/technical law enforcement elements' operational activities. Costs associated with backfill for personnel supporting operational activities are allowable. As with all OPSG personnel costs, OPSG grant funds will be used to supplement existing funds and will not replace (supplant) funds that have been appropriated for the same purpose. Applicants or recipients may be required to supply documentation certifying that a reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

### 1. Operational Overtime Costs

OPSG funds should be used for operational overtime costs associated with law enforcement activities in support of border law enforcement agencies for enhanced border security. Overtime pay is for increased patrol time for certified public safety officers, along with limited support for other law enforcement direct support personnel (e.g., Communication Officers/Dispatchers, non-sworn patrol pilots, etc.). Overtime shall be reimbursed consistently with the non-federal entity's overtime policy and the requirements as stated below:

- Overtime is time worked that exceeds the required number of hours during an employee's designated shift.
- Overtime must be worked to increase patrol capacity and be in support of identified and approved USBP border security operations.
- The OPSG overtime hourly pay will be no more than the approved overtime rate per local law and policy and must be in accordance with applicable state and federal regulations.
- All overtime expenses under OPSG must be reasonable for the services rendered and conform to the non-federal entity's established written policy, which must apply to both federally funded and non-federally funded activities and comply with the other applicable requirements under 2 C.F.R. §§ 200.430-200.431.
- The non-federal entity may not utilize OPSG funding to pay for an employee's overtime hours or pay that exceeds 16 hours worked in any 24-hour period.

### 2. Intelligence Support

Per 6 U.S.C. § 609(a), OPSG funds may, as applicable and operationally beneficial, be used to pay salaries and benefits or overtime for personnel to serve as qualified Intelligence Analysts to enable and enhance information/intelligence sharing capabilities, as well as support existing intelligence analysts previously covered by OPSG funding. Qualified OPSG-funded intelligence analysts can be assigned to an applicable

law enforcement facility/intelligence function as long as information/intelligence sharing is maintained.

To serve as an OPSG-funded intelligence analyst, personnel must meet at least one of the following criteria:

- Complete training to ensure baseline proficiency in intelligence analysis and production within six months of being hired; and/or,
- Previously served as an intelligence analyst for a minimum of two years either in a federal intelligence agency, the military, or state and/or local law enforcement intelligence unit.

OPSG-funded intelligence analysts must demonstrate qualifications that meet or exceed competencies identified in the Common Competencies for state, local, and tribal intelligence analysts, which outlines the minimum categories of training needed for intelligence analysts. A certificate of completion of such training must be on file with the SAA and must be made available to the recipient's respective FEMA HQ Preparedness Officer upon request.

#### *h. Regional Border Projects*

Recipients are encouraged to prioritize the acquisition and development of regional projects on the borders to maximize interoperability and coordination capabilities among federal agencies and with state, local, and tribal law enforcement partners. Such regional projects include:

1. Communications equipment.
2. Radio systems and repeaters.
3. Integration with regional intelligence and information sharing effort (i.e., fusion centers):
  - Intelligence analysts.
4. Situational Awareness equipment:
  - License Plate Reader Networks.
  - Visual detection and surveillance systems.
  - Sensor Systems.
  - Radar Systems (for air and/or marine incursions); and
  - Aircraft systems (manned or unmanned).

#### *i. Transportation Costs and Costs Related to the Provision of Acute Medical Care*

Vehicle, fuel, mileage, operational overtime, and other types of costs otherwise allowable under an OPSG award's HSGP NOFO are allowable where the costs are in support of the necessary transportation of individuals interdicted while carrying out allowable OPSG-funded activities or operations from the point of interdiction to an applicable law enforcement facility.

When transporting individuals interdicted while carrying out allowable OPSG-funded activities or operations from the point of interdiction, non-federal entities may charge vehicle, fuel, mileage, operational overtime, and other types of costs otherwise allowable under an OPSG award's HSGP NOFO associated with necessary transportation to provide acute medical care for individuals being transported from the point of interdiction. In such cases, non-federal entities may also charge operational overtime for personnel that monitor a detained individual receiving acute medical care where the individual remains in the custody of the non-Federal law enforcement agency. Costs incurred beyond the acute phase of medical care (e.g., upon admission to the hospital, or after transfer from an acute care facility to the hospital) and costs incurred once the custodial responsibility of the individual is transferred to CBP are not allowable under OPSG.

Costs described above are allowable regardless of what entity or agency initially makes the interdiction. Personnel costs incurred by non-Federal law enforcement agencies eligible under OPSG (including deputies, corrections officers, or detention officers) for costs described above are allowable.

*j. Temporary or Term Appointments*

Temporary or term appointments are allowable under an OPSG award, so long as they comply with the following:

1. Subrecipients may utilize temporary or term appointments to augment the law enforcement presence on the borders. However, applying funds toward hiring full-time or permanent sworn public safety officers is unallowable.
2. OPSG-funded temporary or term appointments may not exceed the approved period of performance:
  - For OPSG purposes, temporary appointments are non-status appointments for less than one year; and
  - For OPSG purposes, term appointments are non-status appointments for one year, extendable for one year as necessary.
3. OPSG funding for temporary or term appointments may pay for salary only. Benefits are not allowable expenses for term or temporary employees.
4. OPSG remains a non-hiring program. Appropriate uses of temporary or term appointments include:
  - To carry out specific enforcement operations work for ongoing OPSG-funded patrols throughout the Sector Area of Operation.
  - To staff operations of limited duration, such as OPSG-enhanced enforcement patrols targeting specific locations or criminal activity.
  - To fill OPSG positions in activities undergoing transition or personnel shortages and local backfill policies (medical/military deployments).
5. OPSG term and temporary appointments must have all necessary certifications and training to enforce state and local laws. OPSG funds will not be used to train or certify term or temporary appointments except as otherwise stated in this NOFO and the Preparedness Grants Manual; and
6. FEMA provides no guarantee of funding for temporary or term appointments. In addition to the terms of this NOFO, subrecipients must follow their own applicable policies and procedures regarding temporary or term appointments.