

Notice of Funding Opportunity

**Application due: July 31, 2026**









# National Cybersecurity Preparedness Consortium

Assistance Listing Number: 97.148

Funding Opportunity Number: DHS-26-NPD-005-00-96

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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:** Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), National Preparedness Directorate (NPD), National Training and Education Division (NTED).

**Assistance Listing Number:** 97.148

**Notice of Funding Opportunity (NOFO) Title:** Fiscal Year 2026 Homeland Security National Training Program (HSNTP), Continuing Training Grants (CTG), National Cybersecurity Preparedness Consortium (NCPC).

**Funding Opportunity Number:** DHS-26- NPD-005-00-96

**Announcement Type:** Initial

**Expected Award Range:** \$7.6 million

**Expected Total Funding:** \$7.6 million

**Anticipated Number of Awards:** 1

## B. Executive Summary

The Department of Homeland Security Fiscal Year (FY) 2026 Homeland Security National Training Program, Continuing Training Grants (CTG), National Cybersecurity Preparedness Consortium (NCPC) provides funding to the eligible applicant to develop and deliver cybersecurity to develop and ensure the availability and accessibility of high-quality, evidence-based FEMA-certified training to a nationwide audience to strengthen core capabilities and close national preparedness gaps to build a secure and resilient nation.

The NCPC plays an important role in the National Training and Education System, which is part of the larger National Preparedness System (the System). The System is designed to build, sustain, and deliver the core capabilities and achieve the desired outcomes identified in the National Preparedness Goal (the Goal). The Goal is “a secure and resilient nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.” The System provides a consistent and reliable approach to support decision making, resource allocation, and measure progress toward these outcomes. Previously developed courses are available for delivery at [firstrespondertraining.gov](https://firstrespondertraining.gov).



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

## Key Dates

Projected Application Start Date: July 1, 2026

Projected Application End Date: July 31, 2026

Anticipated Funding Selection Date: August 15, 2026

Anticipated Award Date: September 1, 2026

Projected Period of Performance Start Date: September 1, 2026

Projected Period of Performance End Date: August 31, 2029

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

# Eligibility

## A. Eligible Entities

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

### Applicant Eligibility

The University of Texas at San Antonio's Center for Infrastructure Assurance and Security, serving as the executive agent and lead for the National Cybersecurity Preparedness Consortium (NCPC).

### Subapplicant Eligibility

Subapplicants and subawards are allowed under this Funding Opportunity.

## B. Project Type Eligibility

### Allowable Project Types

- Identify current and emerging threats through Unified Training Needs Assessments to inform development of new courses and recertification to ensure communities' needs are being met.
- Collaborate with NCPC partners on new course offers to ensure alignment with current gaps/needs, identify current and future risks, and avoid unnecessary duplication.
- Identify innovative approaches by applying new methodologies, best practices, and by leveraging new technology to improve effectiveness of the training programs.

### Unallowable Project Types

This program does not allow construction and renovation projects.

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

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.

Sub-applicants/subrecipients must submit short bios and resumes. These 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

One per applicant.

## E. Additional Restrictions

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

## 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

The primary purpose of the CTG NCPC program is to provide accessible, multi-level, high-quality cybersecurity training to state, local, territorial, and tribal nation (SLTT) partner emergency management professionals and stakeholders nationwide. The training aims to build a secure and resilient nation that is ready to mitigate, respond to, and recover from hazards and disasters by closing critical infrastructure and cyber threat national preparedness gaps and increasing core capabilities. Training includes topics such as cyber threat detection and response, incident management, and cybersecurity best practices. Over 45 previously developed cybersecurity courses are available for delivery at [www.firstrespondertraining.gov](http://www.firstrespondertraining.gov). Since 2003, NCPC has delivered over 930 instructor-led classes to improve the ability of first responders, emergency managers, and SLTT leaders in the information technology community to strengthen the overall resilience of the nation’s critical infrastructure and improve the ability to respond to cyber threats.

## B. Goals and Objectives

Achieving Efficiency Through State and Local Preparedness [Executive Order 14239](#) establishes that preparedness is most effectively managed at the state, local, and individual levels, with support from a capable, accessible, and efficient federal government. This approach helps save US American lives, protect livelihoods, reduce taxpayer costs through increased efficiency, and promote collective prosperity. In

alignment with this policy and the National Preparedness Goal, FEMA's FY 2026 NCPC program seeks to advance these objectives by partnering with non-federal, state-based training organizations:

1. Identify current and emerging threats, core capabilities, and documented deficiencies.
2. Use the ADDIE instructional design process to develop, update, and sustain training solutions. Enhance training effectiveness and application using innovative approaches, new methodologies, best practices, and technology.
3. Ensure and expand access to, and availability of training at scale in a cost-effective manner.
4. Strengthen the emergency management workforce by providing safe, effective, standardized, applicable, repeatable tactics, techniques, and procedures.
5. Demonstrate good financial stewardship and maximize training return on investment by focusing on cost-effective training delivery.

Ultimately, these efforts will support the nation's first responders, emergency managers, and local leaders' ability to meet current and future needs to prepare for, mitigate against, respond to, and recover from catastrophic disasters to reduce the loss of life and property and protect the Nation from all hazards, while demonstrating good financial stewardship and maximizing return on investment.

## C. Performance Measures and Targets

NCPC members are required to collect data to allow FEMA to measure performance and outcomes. FEMA will measure the NCPC members' performance using the following indicators:

1. To prove that the program supports strategic outcomes and capability gaps through operationally relevant, evidence-based, targeted training solutions aligned with identified current and emerging threats, risks, and hazards, NCPC members and FEMA will determine the number and percentage of courses that are explicitly mapped to at least one National Preparedness Goal core capability through a completed, approved Unified Training Needs Assessment with a goal of 90% of the active portfolio meeting this standard by the end of FY 2028.
2. To ensure partners are using the ADDIE instructional design method to produce high-quality, operationally relevant, cost-effective FEMA-certified training solutions that strengthen resilience, NCPC partners and FEMA will:
  - a. Measure whether the percentage of developed, updated, and sustained courses that are mapped to at least one core capability and outcome articulated in the National Preparedness Goal meets or exceeds 95%.
  - b. Measure whether the percentage of courses that have been reviewed and recertified within their three-year recertification window meets or exceeds 90%.
3. To measure training effectiveness, NCPC partners and FEMA will:
  - a. Measure whether at least 70% of learners attain post-test scores that reflect at least a 26-point increase over pre-test scores, indicating that sufficient learning has occurred (Kirkpatrick Level 2-Learning) and compare this percentage to previous years to ensure these gains are maintained over time.
  - b. Measure whether at least 60% of learners self-report applying knowledge or skills on the job within three months of completing training (Kirkpatrick Level 3-Behavior).
4. To determine how well NCPC partners are operating as an integrated, networked community of training partners, ensuring and expanding access to and availability of high-quality, effective training at scale, FEMA and NCPC partners will:

- a. Calculate whether the percentage of respondents indicating training met or exceeded expectations (Kirkpatrick Level 1, Reaction) averages at least 75% and has not decreased since previous years.
  - b. Determine if at least 15 of 19 Olympic host communities were represented in training rosters.
  - c. Determine the number and percentage of rural communities and tribal nation representatives who attended training.
5. To evaluate how well training helps strengthen the emergency management workforce by providing safe, effective, standardized, applicable, repeatable tactics, techniques, and procedures, NCPC partners and FEMA will determine whether at least 40% of delivered courses provided learners with physical or electronic references and tools that they can retain and use outside of training.
  6. To ensure good financial stewardship of government resources, NCPC partners and FEMA will determine whether the inflation-adjusted average direct cost per course delivery (Kirkpatrick Level 5, ROI) was maintained or reduced annually without impacting satisfaction or learning levels.

## D. Federal Assistance Type

This funding opportunity is a cooperative agreement. The CTG NCPC program, prescribed by this NOFO, is awarded through a separate cooperative agreement, as defined by, and consistent with the [Federal Grant and Cooperative Agreement Act of 1977 \(Pub. L. No. 95-244, 31 U.S.C. §§ 6301-6308\)](#). FEMA maintains substantial involvement with the recipient as it carries out activities under the award to include financial monitoring and all training development and delivery activities, including the creation and approval of course content, arrangement of learning objectives, establishment of training delivery modes and methods, and use of the Kirkpatrick evaluation model. NTED Training Partners Program (TPP) managers serve as the authority to provide approval and disapproval for all activities over the life cycle of the award.

## E. Program-Specific Unallowable Costs

This program does not allow construction and renovation costs and is subject to all terms and conditions where restrictions are provided.

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

## F. General Funding Requirements

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

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

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

## G. Prohibition on Covered Equipment or Services

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

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

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

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

## H. Beneficiary and Participant Eligibility

### Beneficiary

The University of Texas at San Antonio's Center for Infrastructure Assurance and Security, serving as the executive agent and lead for the National Cybersecurity Preparedness Consortium (NCPC).

### Participant

Federal Emergency Management Agency

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

## I. Indirect Costs

Indirect costs are allowed for recipients of this grant.

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**

Pre-award costs are not allowed.

## **L. Management and Administration Costs**

Management and Administration (M&A) costs are allowed at no greater than 5% of award.

M&A are not overhead costs but are necessary direct costs incurred in direct support of the federal award or as a consequence of it, such as travel, meeting-related expenses, and salaries of full/part-time staff in direct support of the program. As such, M&A costs can be itemized in financial reports.

## **M. Authorizing Authority**

[National Cybersecurity Preparedness Consortium Act, Pub. L. No. 117-122 \(2021\)](#)

## **N. Appropriation Authority**

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



## Step 2: Get Ready to Apply

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# Submission Requirements and Application Deadlines

## A. Registration

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

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

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

## B. Requesting the Application Package

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

## C. Application and Submission Instructions

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

1. Apply for, update, or verify their UEI number and EIN from the Internal Revenue Service;
2. Provide their UEI number in the application;
3. Have an account with [login.gov](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](#);
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\(a\)\(2\)\(iv\)](#), 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 31, 2026 12 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](#) 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

No limitations for number of pages, font size and typeface, margins, paper size, number of copies. Sequence and assembly requirements described in Appendix I.

## C. Program-Specific Required Documents and Information

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

1. Project Narrative - Executive Summary and other sections described in Appendix I (submit as a separate attachment labeled as Project Narrative).
2. Detailed Budget and Budget Narrative – Budget information described in Appendix I (submit as a separate attachment labeled as Budget Narrative).
3. Active Indirect Cost Rate Agreement (submit as a separate attachment described as Indirect Cost Rate Agreement).

## 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

NCPC applicants must submit all (100%) required application forms and program specific documents as described in Appendix I of this NOFO.

## B. Application Criteria

This notice provides funding for the NCPC partners to develop, deliver, and evaluate mission critical and mission essential training for state, local, tribal and territorial partners. This training supports the National Preparedness System objective to facilitate an integrated, community-centric, risk-informed, capabilities-based approach to preparedness.

## 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

The application will be thoroughly reviewed by Program Managers from the NTED Training Partner Program and the NTED Division Director. The statement of work proposed by the NCPC will undergo final review by FEMA's Assistant Administrator (A) for the National Preparedness Directorate.

## F. Merit Review Process

There is no merit review process for these non-competitive awards.

## G. Final Selection

FEMA's Assistant Administrator for Resilience will approve or disapprove the awards proposed by the NDPC and submit award recommendations through the FEMA Administrator to the Secretary of Homeland Security.

# 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 30 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.

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

## B. Pass-Through Requirements

Not applicable.

## C. Note Regarding Pre-Award Costs

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

## D. Obligation of Funds

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

## E. Notification to Unsuccessful Applicants

Not applicable.

# 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 indicate 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:

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

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

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

## D. Programmatic Performance Reporting Requirements

1. A Performance Report must be submitted semi-annually throughout the POP.

2. A Performance Report must include: NTED provides recipients with the required template as there is no prescribed government form.
3. The Progress Report must be submitted through FEMA GO.
4. Performance Report Due Dates are as detailed below:

Reporting Period	Report Due Date
January 1 – June 30	July 30
July 1 – Dec. 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

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 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.<sup>1</sup>
5. Supporting documentation to demonstrate that expenses are allowable, allocable, reasonable, and necessary under [2 C.F.R. part 200](#) and in compliance with the grant's NOFO, award terms, and applicable federal regulations.

## M. Immigration Conditions

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

# 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 proposing projects with the potential to impact the environment or cultural resources, such as the modification or renovation of existing buildings, structures, and facilities,

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<sup>1</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.

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

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

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

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

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

## C. Procurement Compliance

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

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

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

documented procurement policies or procedures, they must follow the federal procurement rules listed in [2 C.F.R. §§ 200.318–200.327](#).

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

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

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

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

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

### Threshold 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, and local governments, and their instrumentalities, can be found in [Purchasing Resource and Support for State and Local Government](#).

### Procurement Documentation

Per [2 C.F.R. § 200.318\(i\)](#), local government and nonprofit recipients or subrecipients are required to maintain and retain records sufficient to detail the history of procurement. These records must include, but are not limited to, the rationale for the procurement method, selection of contract type, contractor

selection or rejection, and the basis for the contract price. States and Indian Tribes are reminded that in order for any cost to be allowable, it must be adequately documented per [2 C.F.R. §200.403\(g\)](#).

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

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

## D. Buy America Preference Requirements for Infrastructure

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

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

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

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

### Waivers

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

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

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

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

### 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

National Training and Education Division (NTED) maintains programmatic responsibility for the CTG program and will maintain the program management function and responsibilities throughout the life cycle of the awarded grant. Contact our NTED point of contact Ms. Jessica Sterling at (202) 212-3042 or via email to [Jessica.Sterling@fema.dhs.gov](mailto:Jessica.Sterling@fema.dhs.gov) or Mr. Samuel Phillips at [Samuel.Phillips@fema.dhs.gov](mailto:Samuel.Phillips@fema.dhs.gov) for additional information.

## 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 provide a collaborative space for communities completing the Unified Reporting Tool (URT). Recipients complete and submit their Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR), and other required assessments using the PrepToolkit. For assistance, contact [support@preptoolkit.fema.dhs.gov](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

### Program-Specific Required Documents and Information

#### ***Overview.***

Over the last several years the nation has seen a rise in cyber-attacks and cyber-crimes with disruptive and destructive physical consequences. Industrial control systems which power energy, water, communications, and other critical infrastructure sectors and supporting information technology which are becoming increasingly interdependent and targeted.

#### ***Needs Assessments.***

The University of Texas at San Antonio's Center for Infrastructure Assurance and Security, serving as the executive agent and lead for the National Cybersecurity Preparedness Consortium (NCPC) training proposal/statement of work must identify and explain preparedness gaps that could be addressed through cybersecurity training development and delivery that are distinct from other national training programs and FEMA courses. NCPC partners will use NTED's Unified Training Needs Assessment process to verify that training solutions to be developed, or to be sustained target the need, align with the FEMA mission, focused on performance-level and planning and management level curricula, are not duplicative, and are cost effective in terms of content, modality, and delivery.

#### ***Target Audience.***

Cybersecurity training must empower technical and non-technical personnel in key roles including cybersecurity and information technology professionals, leadership and organizational decision makers, SLTT emergency responders and end users.

#### ***Standards.***

The FY2023 Quadrennial Homeland Security Review is included as a foundational DHS strategic document that informs national risk priorities, SLTT engagement, and Critical Infrastructure resilience; applicable Executive Orders provide overarching policy direction, while technical cybersecurity implementation is informed by relevant cybersecurity frameworks, guidelines, and technical guidance. The NCPC will ensure that their course content aligns to current and future Executive Orders and Presidential Actions; National Frameworks, Guidelines, and Technical Assistance; National Institute of Standards and Technology (NIST) Special Publications (800 & 1800 Series); Government Specific Cybersecurity Directives; Industry Standards; Critical Infrastructure and Sector Specific Standards; and Supply Chain and Vendor Security

#### ***Adult Learning Approach.***

NCPC training programs will use an adult learning approach across of variety of modalities and delivery methods including classroom instruction, virtual training, learning through workshops and seminars, interactive web-based and computer-based training. Adult learning theory includes the following key components outlining the general ways in which adults perceive learning and how they prefer to train: Self-Concept, Adult Learner Experience, Readiness to Learn, Orientation of Learning, and Motivation to Learn.

**Instructional Systems Design (ISD) Expertise.**

NCPC partners must have staff members qualified in the field of Instructional Systems Design whose primary responsibilities are to design, develop, and review instructional content for web-based and/or instructor-led courseware.

**Non-Duplication of Existing Training Programs.**

NCPC developed training must not duplicate training provided by federal, state, local, tribal, or territorial departments and agencies, or other training providers.

**Recertification of Existing Training Programs.**

NCPC developed training must submit to recertification of courses every three years to maintain relevance, accuracy, and effectiveness.

**Course Mapping.**

NCPC partners will use NTED's course mapping process to determine appropriate course complexity, learning levels, and alignment with Mission Areas and Core Capabilities.

**Application Content.**

The NCPC application must include the following:

**Executive Summary.** The NCPC applicant must provide, in the order presented below, an executive summary that includes the following data and information as appropriate using the below template:

**EXECUTIVE SUMMARY TEMPLATE**

Organization Name: [Insert Org Name]

Submission Date: [mo./day/yr]

Summarize, in the order presented below, the following information and data as appropriate.

1. **Total Number of NTED Certified Courses: [Insert Number]**
2. **Certified Course List and Performance Targets [Fill in table, below]**

Course Number	Course Title	Most Recent Certification Date	Average Cost Per Student (by course)	Anticipated Student Throughput for this PoP	Proposed Number of Deliveries for this PoP

3. **Proposed New Courses and Overviews [Fill in table, below]**

Proposed New Courses for this Award	High Level Rationale for Proposed New Course	Average Cost Per Student (by course)	Anticipated Student Throughput for this PoP	Proposed number of deliveries for this PoP

Course: [Course Title and Description]				

### **Program Narrative, Part 1.**

Provide detailed explanations for the following:

- Program alignment with the National Preparedness Goal, National Preparedness System, National Incident Management System, National Planning Frameworks, Mission Areas, and Core Capabilities.
- Description of program management structures to illustrate how the program is organized and managed within the NCP. The NCP must provide an organizational chart and describe how the organization will support the program.
- A detailed program schedule to reflect the program life cycle with phases, deliverables, and outcomes arranged and explained. Include specific information and timelines for all new NTED course development, recertifications, and proposed sustainment plans.
- A process for identifying lessons learned and best practices for ongoing FEMA and DHS efforts.

### **Program Narrative, Part 2 (Training Objectives).**

The NCP must describe their planned approach to design, develop, implement, sustain, and evaluate training. Any new training courses shall be developed and delivered as instructor-led training, designed at the performance or management level. Proposed new courses should align to the following training objectives:

### **Artificial Intelligence and Governance, Compliance, and Risk**

Enable SLTT and applicable community members to develop, implement, and sustain AI governance, risk, and compliance (GRC) programs, including policies, risk frameworks, and procurement standards, that ensure responsible and secure use of artificial intelligence in government operations. Training should:

- Provide SLTT organizations with a foundational understanding of the AI governance landscape, including obligations under applicable international, federal, and state laws.
- Instruct participants on core AI GRC concepts: AI risk categorization, acceptable use policy development, accountability, and the distinction between AI safety, AI security, and AI ethics in government operational contexts.
- Educate participants on managing AI supply chain dependencies, specifically focusing on the security of upstream foundational models and the vetting of third-party AI service providers.
- Present NIST AI RMF (AI 100-1), ISO/IEC 42001, and CISA AI guidance as scalable policy frameworks, and train staff to select and adapt these proportionate to organizational maturity and mission scope.
- Address AI procurement risk as a core GRC competency, covering vendor due diligence, contractual AI transparency requirements, data governance clauses, and third-party AI risk in government service delivery.
- Educate staff on AI-specific threat vectors, including model manipulation, data poisoning, prompt injection, and adversarial misuse, and how these risks often originate from insecure third-party training data or vendor-managed environments ([NSA Artificial Intelligence Security Center et al., 2025](#)).

- Develop capacity to build and maintain an AI system inventory, including shadow AI identification, use-case risk classification, and documentation of human oversight mechanisms for high-impact decisions.
- Instruct organizations on integrating AI governance into existing GRC structures, information security programs, privacy programs, and continuity of operations plans, without creating duplicative frameworks.
- Educate staff on workforce AI policy dimensions: employee acceptable use, prohibition of unauthorized AI tool use with sensitive government data, and role-based training requirements proportionate to AI exposure.
- Enable organizations to engage CISA AI resources, state AI advisory bodies, and peer networks to share governance practices and build collective SLTT capacity for responsible AI adoption.
- Assess emerging AI governance challenges for SLTT environments, including agentic AI systems acting autonomously on government workflows, AI in emergency management and public safety decision support, and liability implications of AI-assisted government determinations affecting citizens (Cloud Security Alliance, 2026).
- Address emerging AI enabled and autonomous cyber threat vectors, including model misuse, data poisoning, and AI assisted decision automation, by integrating threat awareness and control requirements into AI governance, risk classification, procurement, and workforce policy frameworks.

### **Cybersecurity Clinics and Volunteer Networks**

Enable SLTT and applicable community members to establish, sustain, and leverage academic-community cybersecurity clinic partnerships and volunteer cybersecurity networks as force multipliers for community cyber readiness and workforce development. Training should:

- Provide a foundational understanding of the cybersecurity clinic model, including roles of academic, nonprofit, private sector, and government stakeholders, and how these relationships strengthen community cyber resilience without adding resource burden to understaffed SLTT entities.
- Instruct community leaders and academic partners on using volunteers and students to conduct supply chain maturity assessments and third-party risk evaluations for resource-constrained SLTT entities.
- Instruct community leaders and academic partners on applying the Community Cyber Security Maturity Model (CCSMM) as a shared assessment framework to identify gaps, prioritize clinic service delivery, and measure maturity progression across a jurisdiction.
- Present methods for initiating and structuring formal partnership agreements between universities, local government, and private sector organizations to establish or expand cybersecurity clinics that can assist in auditing vendor compliance and software dependencies.
- Address stakeholder engagement and relationship management skills required to sustain cross-sector partnerships, including navigating institutional boundaries, managing volunteers, and maintaining continuity across academic calendars and election cycles.
- Educate program leads on workforce pipeline development, demonstrating how clinic engagements produce work-ready talent aligned to NICE Workforce Framework roles, local government hiring needs, and the management of complex vendor ecosystems.
- Develop organizational capacity to integrate clinic and volunteer outputs, risk assessments, vulnerability findings, and incident response artifacts, into formal cybersecurity programs governed by maturity progression.

- Instruct SLTT organizations on structuring, governing, and safely deploying volunteer cybersecurity resources to support incident response and recovery activities, including role definition, access control, supervision, legal considerations, and integration with existing incident response plans and authorities.
- Assess models for sustaining clinic and volunteer programs beyond initial grant funding, including service-learning integration, public-private partnership structures, and coordination with relevant entities and CISA regional advisors.

### **Vulnerability Management and Vulnerability Operations in an AI World**

Enable SLTT organizations to build sustainable and accelerated vulnerability management cadences and downtime resilience that reduce exploitable windows amid AI-accelerated threats. Training should:

- Develop governance practices including documented approval chains and accountability structures that institutionalize vulnerability management cadence and emerging frontier model ("Mythos-ready") governance that accounts for the speed of AI-driven exploitation in vendor-provided code and shared libraries.
- Assess the threat implications of AI-accelerated vulnerability discovery and exploitation, preparing organizations to adjust risk tolerances, escalate patching governance, and patch third-party software dependencies before they are exploited at scale.
- Map the structural barriers to timely patching in government environments: legacy system dependencies, uptime mandates, undocumented processes, and political consequences of service disruption.
- Instruct staff on risk-based vulnerability triage, including prioritization of CISA KEV (Known Exploited Vulnerabilities) Catalog entries and critical-severity vulnerabilities, to enable rapid remediation cycles without requiring additional headcount.
- Present staged patch testing ring models and rollback drill frameworks that build organizational confidence in patch deployment through structured simulation, reducing ad-hoc practices that delay remediation.
- Address the operationalization of Software Bills of Materials (SBOMs) to identify and remediate vulnerabilities hidden within the vendor-supplied software supply chain.
- Address stakeholder communication strategies for downtime events, equipping IT and security staff with templates and protocols for informing elected officials, department heads, and the public during planned and emergency maintenance windows.
- Educate staff on free patch management and vulnerability tracking tools available through CISA and open-source ecosystems, enabling repeatable weekly cadence workflows without new tool procurement.
- Address emerging AI enabled and autonomous cyber threat vectors, including model misuse, data poisoning, and AI assisted decision automation, by integrating threat awareness and control requirements into AI governance, risk classification, procurement, and workforce policy frameworks.

### **Cybersecurity in Critical Infrastructure Operational Technology Environments**

Enable SLTT and applicable community members to assess, secure, and monitor operational technology (OT) environments supporting all Critical Infrastructure sectors and public services, including but not limited to the transportation sector including maritime transportation systems, ports, inland waterways, Great Lakes operations, ferries, bridges, and lock/dam environments, against escalating nation-state and organized crime threats. Training should:

- Provide a foundational understanding of the OT threat landscape, including IT/OT network convergence, and the security challenges of legacy industrial control systems managed by non-security personnel or third-party vendors across SLTT and Critical Infrastructure sectors, including but not limited to maritime terminal operators, vessel support contractors, and waterway system maintainers.
- Instruct cross-functional IT and OT staff on network segmentation principles, including practical zone-based architecture implementation within resource-constrained environments.
- Educate organizations on assessing the supply chain risk of OT components, ensuring that hardware and software from vendors meet "Secure by Design" principles before deployment
- Present vulnerability scanning and anomaly monitoring techniques for OT environments, emphasizing free and low-cost tools available through CISA and sector-specific resources
- Address multi-jurisdictional OT management challenges, including shared infrastructure governance, rigorous vendor access controls for third parties maintaining critical systems, and coordination protocols across SLTT and Critical Infrastructure sectors, including but not limited to port authorities, municipalities, tribal entities, state agencies, and federal partners.
- Educate organizations on applying ISA/IEC 62443 and NIST SP 800-82 proportionately to small-team capacity, focusing on actionable hygiene improvements.
- Develop awareness of the expanding OT attack surface from cloud and IoT convergence, and train staff to assess emerging technology integrations for security risk before deployment across SLTT and Critical Infrastructure sectors, encompassing remote vessel telemetry, smart port sensors, and connected logistics platforms
- Enable organizations to develop and exercise OT-specific incident response procedures that account for physical consequences and ensure coordination between cybersecurity staff, operations personnel, emergency management, and third-party service providers across SLTT and Critical Infrastructure sectors, including but not limited to degraded-mode operations where digital maritime systems are unavailable.
- Educate organizations on positioning, navigation, and timing dependencies, including GNSS/GPS spoofing and AIS manipulation risks that may disrupt awareness and operational safety across SLTT and Critical Infrastructure sectors, including but not limited to transportation, maritime, and port environments.
- Apply secure network segmentation, Zero Trust access control, and performance preserving cybersecurity controls to public safety and OT adjacent communications systems, including but not limited to LMR management, dispatch, control, logging, interoperability, and associated enabling systems, with an emphasis on maintaining availability and continuity during cyber incidents without requiring physical system reconfiguration.

### ***Work Breakdown Structure.***

The NCPD will provide a work breakdown structure (WBS) as part of the application. A WBS is a task-oriented schematic of activities that organizes, defines, and graphically displays the total work to achieve the final objectives of a project.

The WBS applies a system for subdividing a project into manageable work packages, components, or elements to provide a common framework for scope/cost/schedule communications, allocation of responsibility, risk management, performance-based evaluations, and a quality control plan. The WBS establishes deliverables arranged on an anticipated timeline. Each descending level represents an

increasingly detailed definition of the project objective. Components of the WBS include, but are not limited to, the following:

- A risk management plan describing the approach for identifying and managing risks, and identifying known or postulated events or factors that could prevent a recipient from meeting program objectives (cost, schedule, scope, performance, or quality);
- A performance-based evaluation plan, including program performance measures that will assess the attainment of goals, objectives, outcomes, and which details a data collection plan including the analysis of data; and
- A quality control plan for the development and delivery of programs and courses.

### ***Equipment Plan.***

The NCPC must provide an equipment-purchasing plan for proposed equipment purchases that are required to support the program. At a minimum, the plan must detail planned equipment purchases, why they are necessary, and the costs of the equipment.

### ***Detailed Budget.***

The NCPC must provide a detailed budget by task and a summary budget aggregating task costs into the categories of personnel, fringe benefits, travel, equipment, supplies, consultants/contracts, other costs, indirect costs, and the total budget. Submit the detailed budget with the grant application as a file attachment within FEMA GO. The budget must be complete, reasonable, and cost-effective in relation to the proposed project. The budget should provide the basis of computation of all project-related costs, any appropriate narrative, and a detailed justification of M&A costs. Budget information must also address the following:

- **PERSONNEL.** The NCPC must indicate the total projected salary and wages for all project personnel. Compensation paid for employees engaged in activities must be consistent with that paid for similar work within the NCPC organization.
- **FRINGE BENEFITS.** The NCPC must provide allowable, reasonable, and documented costs of compensation beyond salaries.
- **TRAVEL.** The NCPC must provide the total projected cost for travel. The NCPC should determine costs by the projected number of trips multiplied by the number of people traveling multiplied by an average cost for travel and per diem (airfare, lodging, meals). Separate travel for development of training and delivery of training in the detailed budget but include all travel costs as a single total in the summary budget. Detail travel performed at the request of NTED under travel for development of training.
- **EQUIPMENT.** The NCPC must provide the total projected cost for non-expendable items. Non-expendable equipment is tangible property, having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. The NCPC may use the organization's own capitalization policy and threshold amount for classification of equipment. Expendable items should be included in the "Supplies" category. The NCPC should analyze the cost benefits of purchasing versus leasing equipment, especially high-cost items, and those subject to rapid technical advances. List rented or leased equipment costs in the "Contracts" category. Identify and explain equipment purchases.

- **SUPPLIES.** The NCPC must provide the total projected cost of supplies (e.g., office supplies, postage, training materials, copying paper, and other expendable items, such as books and hand-held tape-recording devices). The organization's own capitalization policy and threshold amount for classification of supplies may be used. Generally, supplies include any materials that are expendable or consumed during the project.
- **CONSULTANTS/CONTRACTS.** The NCPC must provide the total projected cost of consultants and contracts. Identify and justify the type of consultant/contract.
- **OTHER COSTS.** The NCPC must provide a total projected cost of miscellaneous items (e.g., rent, reproduction, telephone, janitorial or security services, and investigative or confidential funds).
- **INDIRECT COSTS.** The NCPC must provide a copy of an active indirect cost rate agreement. FEMA will evaluate indirect costs as part of the application for federal funds to determine whether it is allowable and reasonable.