

The Department of Homeland Security (DHS)

Notice of Funding Opportunity (NOFO)

FIFA World Cup Grant Program

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.

Contents

1. Basic Information	4
A. Agency Name	4
B. NOFO Title.....	4
C. Announcement Type	4
D. Funding Opportunity Number	4
E. Assistance Listing Number.....	4
F. Expected Total Funding.....	4
G. Anticipated Number of Awards	4
H. Expected Award Range.....	4
I. Projected Application Start Date	4
J. Projected Application End Date.....	4
K. Anticipated Funding Selection Date	4
L. Anticipated Award Date	4
M. Projected Period of Performance Start Date.....	4
N. Projected Period of Performance End Date.....	4
O. Executive Summary	4
P. Agency Contact.....	5
2. Eligibility	6
A. Eligible Entities/Entity Types	6
B. Project Type Eligibility.....	8
C. Requirements for Personnel, Partners, and Other Parties.....	8
D. Maximum Number of Applications.....	9
E. Additional Restrictions	9
F. References for Eligibility Factors within the NOFO	9
G. Cost Sharing Requirement	10
H. Cost Share Description, Type and Restrictions.....	10
I. Cost Sharing Calculation Example.....	10
J. Required information for verifying Cost Share.....	10
3. Program Description	10
A. Background, Program Purpose, and Program History	10
B. Goals and Objectives	10
C. Program Rationale.....	10
D. Federal Assistance Type.....	11
E. Performance Measures and Targets.....	11
F. Program-Specific Unallowable Costs	11

G. General Funding Requirements.....	13
H. Indirect Costs (Facilities and Administrative Costs).....	13
I. Management and Administration (M&A) Costs	13
J. Pre-Award Costs	13
K. Beneficiary Eligibility	14
L. Participant Eligibility.....	14
M. Authorizing Authority	14
N. Appropriation Authority.....	14
O. Budget Period.....	14
P. Prohibition on Covered Equipment or Services.....	14
4. Application Contents and Format	14
A. Pre-Application, Letter of Intent, and Whitepapers	14
B. Application Content and Format	14
C. Application Components.....	14
D. Program-Specific Required Documents and Information	14
E. Post-Application Requirements for Successful Applicants	15
5. Submission Requirements and Deadlines	15
A. Address to Request Application Package.....	15
B. Application Deadline.....	18
C. Pre-Application Requirements Deadline.....	18
D. Post-Application Requirements Deadline	18
E. Effects of Missing the Deadline	18
6. Intergovernmental Review	18
A. Requirement Description and State Single Point of Contact.....	18
7. Application Review Information.....	18
A. Threshold Criteria.....	18
B. Application Criteria	19
C. Financial Integrity Criteria	19
D. Supplemental Financial Integrity Criteria and Review.....	19
E. Reviewers and Reviewer Selection	19
F. Merit Review Process	20
G. Final Selection.....	20
8. Award Notices.....	20
A. Notice of Award	20
B. Pass-Through Requirements	21
C. Note Regarding Pre-Award Costs	21
D. Obligation of Funds.....	21
E. Notification to Unsuccessful Applicants	21
9. Post-Award Requirements and Administration	22
A. Administrative and National Policy Requirements.....	22
B. DHS Standard Terms and Conditions.....	22
C. Financial Reporting Requirements	22
F. Disclosing Information per 2 C.F.R. § 180.335.....	23
G. Reporting of Matters Related to Recipient Integrity and Performance.....	23
H. Single Audit Report	23
I. Monitoring and Oversight.....	24
J. Program Evaluation.....	24
K. Additional Performance Reporting Requirements	24

L. Termination of Federal Award	25
M. Best Practices	26
N. Payment Information	27
10. Other Information	28
A. Period of Performance Extension	28
B. Other Information	28

1. Basic Information

A. Agency Name	U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA)
B. NOFO Title	FIFA World Cup Grant Program (FWCGP)
C. Announcement Type	Initial
D. Funding Opportunity Number	To be determined
E. Assistance Listing Number	97.160
F. Expected Total Funding	\$625,000,000
G. Anticipated Number of Awards	9 awards
H. Expected Award Range	\$32,000,000 – \$74,000,000
I. Projected Application Start Date	10/28/2025
J. Projected Application End Date	12/05/2025 5:00 p.m. Eastern Time (ET)
K. Anticipated Funding Selection Date	12/18/2025
L. Anticipated Award Date	No later than January 30, 2026
M. Projected Period of Performance Start Date	07/04/2025
N. Projected Period of Performance End Date	08/31/2026
O. Executive Summary	The FIFA World Cup Grant Program (FWCGP), administered by the U.S. Department of Homeland Security (DHS) through the Federal Emergency Management Agency's (FEMA) Grant Programs Directorate (GPD), provides \$625 million in federal funding to enhance security and preparedness for the 2026 FIFA World Cup events in the United States. This standalone grant program supports the safe execution of the largest sporting event in history, co-hosted with Canada and Mexico, which is expected to attract over five million international visitors and generate tens of billions of dollars in economic activity across 11 U.S. host cities over 38 days. The program addresses significant security challenges, with all 78 U.S.-

	based matches designated as Special Event Assessment Rating (SEAR) I and II events, building on historical federal support for major events like the Olympics. The FWCGP makes funds available to the Host City Committee Task Forces through governor-designated State Administrative Agencies (SAA). To carry out the extensive security activities required to protect players, staff, attendees, venues, and critical infrastructure across the host cities, strengthening them against potential terrorist attacks, the Host City Committee Task Force in each of the 11 host cities will then make subawards to local units of government.
P. Agency Contact	a. <i>Program Office Contact</i> FEMA has assigned Preparedness Officers to each state for the FWCGP. If you are unsure who your Preparedness Officer is, please contact FEMA Grants News by phone at (800) 368-6498 or by email at fema-grants-news@fema.dhs.gov, Monday through Friday, 9:00 AM – 5:00 PM ET. b. <i>FEMA Grants News</i> This channel provides general information on all FEMA grant programs and maintains a comprehensive database containing key personnel contact information at the federal, state, and local levels. FEMA Grants News Team is reachable at fema-grants-news@fema.dhs.gov OR (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET. c. <i>Grant Programs Directorate (GPD) Award Administration Division</i> GPD’s Award Administration Division (AAD) provides support regarding financial matters and budgetary technical assistance. AAD can be contacted at ASK-GMD@fema.dhs.gov. d. <i>FEMA Regional Offices</i> FEMA Regional Offices also may provide fiscal support, including pre- and post-award administration and technical assistance. FEMA Regional Office contact information is available at https://www.fema.gov/fema-regional-contacts. e. <i>Civil Rights</i> Consistent with Executive Order 14173, Ending Illegal Discrimination & Restoring Merit-Based Opportunity, the FEMA Office of Civil Rights is responsible for ensuring compliance with and enforcement of federal civil rights obligations in connection with programs and services conducted by FEMA. They are reachable at FEMACivilRightsOffice@fema.dhs.gov.

	f. <i>Environmental Planning and Historic Preservation</i> The FEMA Office of Environmental Planning and Historic Preservation (OEHP) provides guidance and information about the EHP review process to FEMA programs and recipients and subrecipients. Send any inquiries regarding compliance for FEMA grant projects under this NOFO to FEMA-OEHP-NOFOQuestions@fema.dhs.gov. g. <i>FEMA GO</i> For technical assistance with the FEMA Grants Outcomes (FEMA GO) system, please contact the FEMA GO Helpdesk at femago@fema.dhs.gov or (877) 585-3242, Monday through Friday, 9:00 AM – 6:00 PM ET. h. <i>Preparedness Grants Manual</i> Recipients seeking guidance on policies and procedures for managing preparedness grants should reference the Preparedness Grants Manual at Preparedness Grants Manual. Only the portions of the Preparedness Grants Manual specifically referenced in this NOFO apply to this grant.
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2. Eligibility

A. Eligible Entities/Entity Types	Only the following entities or entity types are eligible to apply. a. <i>Applicants</i> The SAA is the only entity eligible to submit FWCGP applications to DHS/FEMA. Funds will be awarded to SAAs in nine eligible states (California, Florida, Georgia, Massachusetts, Missouri [on behalf of Missouri and Kansas], New Jersey [on behalf of New York and New Jersey], Pennsylvania, Texas, and Washington), with a mandatory pass-through to the Host City Committee Task Forces within 45 days of receipt of funds by the SAA, to support security and preparedness activities. After release of funds, the SAA shall make 100% of the funds available to local or tribal governments within 45 days. Funds shall be distributed and the SAA must certify to FEMA that the pass-through is complete, listing amounts and recipients. b. <i>Subapplicants</i> Subapplicants and subawards are allowed. SAAs distribute FWCGP funds through subawards to the Host City Committee Task Force in each of the 11 host cities. The Host City Committee Task Force in each of the 11 host cities will then make subawards to local units of government. These organizations, called
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	subrecipients, use the funds for enhancing safety and security for the World Cup matches in their cities. 1. Subrecipient Eligibility Under the FWCGP, FEMA provides funds to each state's SAA. The SAA will then subaward these funds to the 11 designated Host City Committee Task Forces in: Atlanta, GA; Boston, MA; Dallas, TX; Houston, TX; Kansas City, MO; Los Angeles, CA; Miami, FL; New York City/Northern New Jersey Area (East Rutherford, NJ); Philadelphia, PA; San Francisco Bay Area (Santa Clara, CA); and Seattle, WA. Pursuant to 6 U.S.C. § 611(b), the SAA is required to form or utilize an existing Planning Committee. This Planning Committee will include representation from the SAA; Urban Area(s) hosting the World Cup games; local or tribal government officials; emergency response providers, which shall include representatives of the fire service, law enforcement, emergency medical services, and emergency managers; public health officials and other appropriate medical practitioners; individuals representing educational institutions, including elementary schools, community colleges, and other institutions of higher education; State and regional interoperable communications coordinators, as appropriate; State and major urban area fusion centers, as appropriate; and the Host City Committee Task Force. FWCGP funding must be subawarded to the Host City Committee Task Force after written agreement is obtained from the Planning Committee, whose membership includes local units of government. To satisfy the statutory pass-through requirements at 6 U.S.C. § 605(c), the Planning Committee will consent and confirm through a written document that the Host City Committee Task Force may receive subawards on behalf of the local government and that this satisfies the statutory pass-through requirement. The Host City Committee Task Force in each of the 11 host cities will then make subawards to local units of government. The Host City Committee Task Force may also make subawards to state agencies, such as law enforcement, emergency management, or public health agencies, to support security and preparedness activities for the FIFA World Cup. However, state agencies may only use funds subawarded by the Host City Committee Task Force and cannot receive or use funds directly awarded to the state under this program. State agencies may also enter into interagency agreements with local government subrecipients to
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	use funds subawarded to that government for allowable activities under this award. 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. c. Impact on broader FEMA grant eligibility Receipt of funding under the FWCGP will not impact funding allocations or awards under any other FEMA grant program. Awards under programs such as the Homeland Security Grant Program, Transit Security Grant Program, Regional Catastrophic Preparedness Grant Program, or the Emergency Management Performance Grant Program will be unaffected by any funding received under this program.
B. Project Type Eligibility	a. Unallowable Project Types See Section 3.F Program-Specific Unallowable Costs for more information on unallowable project types. b. Allowable Project Types Allowable costs for the FWCGP generally fall into five main categories: planning, organization, equipment, training, and exercises (POETE). All projects funded under the FWCGP must demonstrate a clear connection to building capabilities that safeguard FIFA World Cup events. All costs must have a demonstrated nexus to achieving target capabilities related to preventing, preparing for, protecting against, and responding to acts of terrorism in accordance with 6 U.S.C. 609(a) and 605(a). Funds may also be used in a manner that enhances preparedness for disasters unrelated to acts of terrorism, if such use assists such governments in achieving target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism, pursuant to 6 U.S.C. 609(c). Please see Appendix A: Allowable Costs for more information on allowable costs. If there are questions about specific expenses, contact your FEMA Preparedness Officer.
C. Requirements for Personnel, Partners, and Other Parties	An application submitted by an otherwise eligible non-federal entity (i.e., the applicant) may be deemed ineligible when the person that submitted the application is not: 1. A current employee, official, or leader of the recipient organization; and

	2. Authorized to apply for the award on behalf of the entity at the time of submission. Additionally, the Authorized Organization Representative (AOR) must: 1. Be a current authorized employee, official, or leader of the recipient organization. 2. Use a unique email address associated with the recipient organization at the time of application and upon any change in assignment during the period of performance. Consultants or contractors are not permitted to serve as the AOR of the recipient organization. For more information on the roles and responsibilities of the AOR, refer to FEMA's guidance on Roles and Permissions. Subapplicants should not have foreign nationals or noncitizens included. If a subapplicant has foreign nationals, they must be properly vetted and must adhere to all government statutes, policies, and procedures, including “staff American, stay in America” and security requirements. Subapplicants/subrecipients must submit short biographies and resumes. This should include the type of entity, organizational leadership, and board members along with both the names and addresses of the individuals. Resumes are subject to approval.
D. Maximum Number of Applications	The maximum number of applications that can be submitted is: 1. One per applicable SAA
E. Additional Restrictions	Applicants/subapplicants or recipients/subrecipients are required to certify their compliance with federal statutes, DHS directives, policies, and procedures. Under the FWCGP, there are specific funding guidelines / requirements for allocating funds: <i>a. Pass-Through Requirements</i> Awards made to the SAA for the FWCGP carry additional mandated pass-through requirements. Pass-through is defined as an obligation on the part of the SAA to make funds available to identified subrecipients. FWCGP funding must be subawarded to the Host City Committee Task Force after a written agreement is obtained from the Planning Committee, as described in Section 2.A.b.1 Subapplicant Eligibility.
F. References for Eligibility Factors within the NOFO	Please see the following references provided below: 1. “Responsiveness Review Criteria” subsection 2. “Financial Integrity Criteria” subsection

	3. “Supplemental Financial Integrity Criteria and Review” subsection 4. FEMA may/will request financial information such as Employer Identification Numbers (EIN) and bank information as part of the potential award selection. This will apply to everyone prospered, including subrecipients.
G. Cost Sharing Requirement	There is no cost share requirement.
H. Cost Share Description, Type and Restrictions	Not applicable.
I. Cost Sharing Calculation Example	Not applicable.
J. Required information for verifying Cost Share	Not applicable.

3. Program Description

A. Background, Program Purpose, and Program History

The FWCGP is a new standalone grant program designed to provide targeted funding to enhance security and preparedness for the 2026 FIFA World Cup events hosted in the United States. The 2026 World Cup, co-hosted by the United States, Canada, and Mexico, is comprised of 78 U.S.-based matches across 11 cities in the United States with an anticipated five million international visitors attending throughout the competition. The scale of the event poses significant security challenges. DHS has designated the 78 U.S.-based matches as SEAR I and II events, highlighting elevated risks. This program supports increases in training and readiness exercises, staff background checks, cybersecurity defense, as well as increased police and emergency response for FIFA venues, hotels, transportation hubs, and other critical infrastructure.

The Federal Government has historically provided financial support for large-scale, high-risk events such as the Olympic and Paralympic Games in 1984, 1996, and 2002. Considering recent threats to similar events, DHS/FEMA is making \$625 million in federal resources available through the FWCGP to the 11 Host City Committee Task Forces to address the heightened risk the World Cup matches represent. These Task Forces will collaborate throughout with the White House Task Force on the FIFA World Cup 2026.

B. Goals and Objectives

The FWCGP will provide the 11 U.S.-based FIFA World Cup Host City Committee Task Forces with Federal resources to aid Host Cities in implementing the necessary security measures and strengthen capabilities required for this series of 78 high-risk events. FWCGP funds will enhance the ability of local law enforcement, emergency responders, and public safety officials to prepare for, protect against, and respond to threats and emergencies during the World Cup matches.

C. Program Rationale

The FIFA World Cup in 2026 represents a series of high-risk events, occurring nationwide and drawing at least five million spectators. Attendees will include the general public, players, and multiple heads of state and other foreign dignitaries. Considering the significant risk posed by

the 2026 FIFA World Cup, President Trump signed Executive Order 14234, Establishing the White House Task Force on FIFA World Cup 2026 to “assist in the planning, organization, and execution of the events surrounding the 2025 Club World Cup and 2026 FIFA World Cup.” In support of this effort, DHS/FEMA is offering the FWCGP to provide the Host City Committee Task Forces in the 11 host cities with \$625 million for security and planning related to the 2026 FIFA World Cup. Investments under this program will include projects that build, sustain, and deliver the capabilities needed to prevent, prepare for, protect against, and respond to safety concerns during and related to the FIFA World Cup events.

The stated goals, objectives and priorities of the FWCGP fully support [Executive Order 14234, Establishing the White House Task Force On The FIFA World Cup 2026](#).

D. Federal Assistance Type
Grant

E. Performance Measures and Targets

1. Number of FWCGP-funded operational overtime hours tracked and reported by the recipient in support of security and public safety operations for FIFA World Cup-related planning and event execution.
2. Number of DHS/FEMA-sponsored and approved Training Sessions completed for law enforcement, emergency responders, and security personnel using FWCGP funds.
3. Number of Homeland Security Exercise and Evaluation Program (HSEEP)-compliant Exercises completed for law enforcement, emergency responders, and security personnel using FWCGP funds.
4. Number of FWCGP-funded Emergency Response Teams deployed to FIFA venues, hotels, and transportation hubs.
5. The number of security incidents successfully managed or mitigated during the World Cup events.
6. Collect feedback from international visitors, FIFA officials, and local stakeholders on the overall security and preparedness of the events.

F. Program-Specific Unallowable Costs

Per FEMA policy and published in [Information Bulletin No. 530](#), the purchase of weapons and weapons accessories, including ammunition, is not allowed with FWCGP funds. Grant funds may not be used for the purchase of the following equipment: firearms; ammunition; grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons installed. *(For the purposes of this NOFO, “weaponized aircraft” refers to any aircraft, manned or unmanned, that is equipped with, or designed to deliver, weapons or munitions. Non-weaponized aircraft and Unmanned Aircraft Systems((UAS) used for monitoring, surveillance, or data collection are not prohibited, unless otherwise specified. Requests for technologies with dual-use or mitigation functions that may fall into a gray area should be submitted to FEMA for pre-approval and justification.)*

Unauthorized exercise-related costs include:

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

FWCGP funds may not be used to support the hiring of sworn public safety officers for purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities (6 U.S.C. § 609(b)(1)(A)). ***However, funds may be spent for operational overtime costs and surge personnel.*** The SAA, on behalf of the Host City Committee Task Force, must submit operational overtime requests in writing to its assigned FEMA Headquarters Preparedness Officer (see [Appendix B](#) for additional information on operational overtime costs). FEMA will consider requests for activities in advance. However, such requests must be within the award's current period of performance and must not result in the need for a request to extend the period of performance.

Requests must address the threat environment as it relates to the event or activity requiring operational overtime support and explain how the overtime activity is responsive to the threat.

- Request letters sent to FEMA must be UNCLASSIFIED but may be labeled "For Official Use Only." If explaining the threat will require the sharing of classified information, the letter should state that fact. FEMA will then plan for the sharing of classified information through official channels;
- Post-event operational overtime requests will only be considered on a case-by-case basis, where it is demonstrated that exigent circumstances prevented submission of a request in advance of the event or activity;
- Under no circumstances may FEMA grant funding be used to pay for costs already supported by funding from another federal source;
- FEMA will consult and coordinate with appropriate DHS components as necessary to verify information used to support operational overtime requests.

As directed by Section 2008(b)(2) of the Homeland Security Act of 2002 (codified as amended at 6 U.S.C. § 609(b)(2)), FWCGP recipients and subrecipients may not use more than 50% of their total award amount to pay for personnel activities unless a waiver is approved by FEMA. ***Recognizing that 94% of these funds will be used to support operational overtime activities, when a state submits a grant application indicating that more than 50% of the funding will be allocated to personnel costs, FEMA will treat the grant application as a formal request for a waiver of the 50% limitation. FEMA's subsequent awarding of the grant will constitute approval of the waiver. A separate waiver request will not be necessary.***

G. General Funding Requirements

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

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

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

H. Indirect Costs (Facilities and Administrative Costs)

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

I. Management and Administration (M&A) Costs

Subrecipients may use up to **5%** of the funding passed through by the state specifically for M&A related to the FWCGP award.

M&A costs 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.

J. Pre-Award Costs

Pre-award costs are defined as costs incurred by the applicant prior to the start date of the period of performance of the federal award and are allowable only with the prior written approval of DHS/FEMA and as included in the award agreement. To request pre-award costs, a written request must be included with the application and signed by the AOR of the entity. The letter must outline what the pre-award costs are for, including a detailed budget break-out of pre-award costs from the post-award costs, and a justification for approval. For more information, please contact your assigned FEMA Headquarters Preparedness Officer.

K. Beneficiary Eligibility

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

L. Participant Eligibility

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

M. Authorizing Authority

Section 2004 of the *Homeland Security Act of 2002* (Pub. L. No. 107-296, as amended) (6 U.S.C. § 605).

N. Appropriation Authority

Section 90005(a)(1)(B) of the *One Big Beautiful Bill Act, 2025* (Pub. L. No. 119-21).

O. Budget Period

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

P. Prohibition on Covered Equipment or Services

See the [Preparedness Grants Manual](#) Section 3.2.3, which is incorporated by reference into this NOFO, for information on prohibitions on expending funds on covered telecommunications and surveillance equipment and services.

4. Application Contents and Format

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

Not applicable.

B. Application Content and Format

Not applicable.

C. Application Components

The following forms or information are required to be submitted via FEMA GO. The Standard Forms (SF) are also available at [Forms | Grants.gov](#).

- SF-424, Application for Federal Assistance
- Grants.gov Lobbying Form, Certification Regarding Lobbying
- SF-424A, Budget Information (Non-Construction)
- SF-424B, Standard Assurances (Non-Construction)
- SF-LLL, Disclosure of Lobbying Activities

D. Program-Specific Required Documents and Information

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

a. Investment Justification Development

Each Investment Justification begins with an overview that aligns the proposed investments with the program's goals.

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

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

- FEMA GO – Web based Summary of Grant Request Details
- FEMA GO – Detailed Budgets (web based)

E. Post-Application Requirements for Successful Applicants

Not applicable.

5. Submission Requirements and Deadlines

A. Address to Request Application Package

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

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

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

- a. Apply for, update, or verify their Unique Entity Identifier (UEI) number and EIN from the Internal Revenue Service;
- b. In the application, provide an UEI number;

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

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

How to Register to Apply:

General Instructions:

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

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

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

Obtain Employer Identification Number:

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

Create a login.gov account:

Applicants must have a login.gov account in order to register with SAM or update their SAM registration. Applicants can create a login.gov account at:

https://secure.login.gov/sign_up/enter_email?request_id=34f19fa8-14a2-438c-8323-a62b99571fd.

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

For more information on the login.gov requirements for SAM registration, refer to

<https://www.sam.gov/SAM/pages/public/loginFAQ.jsf>.

Register with SAM:

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

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

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

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

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

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

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

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

Submitting the Final Application:

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

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

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

B. Application Deadline

12/05/2025 5:00 p.m. Eastern Time

C. Pre-Application Requirements Deadline

Not applicable.

D. Post-Application Requirements Deadline

Not applicable.

E. Effects of Missing the Deadline

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

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

6. Intergovernmental Review

A. Requirement Description and State Single Point of Contact

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

7. Application Review Information

A. Threshold Criteria

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

a. Entities Ineligible to Apply for and Receive FWCGP Funding Directly from FEMA

- **Non-SAA Organization** - SAAs are the only eligible applicants to submit FWCGP applications to FEMA.
- **Unaffiliated or Unauthorized Representatives** - Applications submitted by individuals who are not current employees, personnel, or authorized representatives of the applicant organization (e.g., consultants or contractors acting on behalf of an organization) will be deemed ineligible.
- **Direct Applications by Tribal Governments** - Tribal governments cannot directly apply for FWCGP funding. However, they may receive funding as subrecipients through their state's SAA.

b. Ineligible Projects

- Projects that do not align with the purposes of the FWCGP, including those that fail to demonstrate a clear nexus to preventing, preparing for, protecting against, or responding to acts of terrorism.
- Activities not permitted under the FWCGP guidance or that do not meet criteria for allowable costs as outlined in [Appendix A](#) of this NOFO.

c. Non-Compliance with Federal Requirements

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

B. Application Criteria

Not Applicable.

C. Financial Integrity Criteria

Before making an award, FEMA 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 Review

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

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

E. Reviewers and Reviewer Selection

The FWCGP applications will be reviewed through a two-phase state and federal review process for completeness, adherence to programmatic guidelines, feasibility, and how well the project descriptions and justifications addresses the identified risk(s).

a. State Review

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

- Conduct an eligibility review;
- Coordinate with the Host City Committee Task Force(s), then prioritize projects that align with the NOFO requirements;
- Submit Investment Justifications that are recommended for funding to DHS/FEMA; and,
- Submit all Investment Justifications received and not recommended for funding, including incomplete Investment Justifications and Investment Justifications from subapplicants deemed ineligible to DHS/FEMA.

b. Federal Review

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

- Eligibility, feasibility, and alignment with the application criteria listed in this NOFO; and
- Compliance with SAFECOM Guidance on Emergency Communications Grants (SAFECOM Guidance).

F. Merit Review Process

FWCGP applications are reviewed first by the SAA for completeness, eligibility, and alignment with program priorities. All applications are then reviewed by federal reviewers for compliance with programmatic, legal, and financial requirements. Reviewers use qualitative criteria to assess each application's feasibility and alignment with FWCGP objectives. No formal numerical or weighted scoring system is used; any internal scoring is advisory only and does not serve as the basis for selection or funding levels. Final funding decisions are made by the Secretary of Homeland Security, taking into account risk, subject-matter expert input, project feasibility, and national priorities.

G. Final Selection

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

8. Award Notices

A. Notice of Award

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

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

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

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

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

B. Pass-Through Requirements

Under the FWCGP, SAAs must pass **100%** of funding to the 11 Host City Committee Task Forces. *To satisfy the statutory pass through requirements at 6 U.S.C. § 605(c), the state-led Planning Committee as required in 6 U.S.C. § 611(b), which will include representation from local governments and the Host City Committee Task Force in the state, will consent and confirm through a written document that the Host City Committee Task Force may receive subawards on behalf of the local government and that this satisfies the statutory pass through requirement.*

States must pass through **100%** of funds to the Host City Committee Task Forces within **45 days after receipt of funds**. FEMA interprets “receipt of funds” as the date FEMA releases any holds in FEMA GO. Funds must be distributed unconditionally, and the SAA must certify to FEMA that the pass-through is complete, listing amounts and recipients.

C. Note Regarding Pre-Award Costs

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

D. Obligation of Funds

Funds are obligated upon award.

E. Notification to Unsuccessful Applicants

FEMA informs the SAA about unsuccessful subrecipients or projects under the FWCGP at the time of the award. The SAA is then responsible for notifying the subapplicants and sharing any relevant feedback or information.

9. 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.

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.

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

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

C. Financial Reporting Requirements

See the [Preparedness Grants Manual](#) Section 5.2, which is incorporated by reference into this NOFO, for information on financial reporting requirements.

D. Programmatic Performance Reporting Requirements

See the [Preparedness Grants Manual](#) Section 5.3, which is incorporated by reference into this NOFO, for information on performance reporting requirements.

E. Closeout Reporting Requirements

See the [Preparedness Grants Manual](#) Section 5.5, which is incorporated by reference into this NOFO, for information on closeout reporting requirements and administrative closeout.

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

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

Before entering into a federal award, the applicant must notify FEMA if it knows that the applicant or any of the principals (as defined at [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 § 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 FEMA 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.

G. 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 2 of Appendix XII;
2. The required reporting frequency is described in paragraph 4 of Appendix XII.

H. Single Audit Report

A recipient expending \$1,000,000 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](#).

I. 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.

J. Program Evaluation

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

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

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

K. Additional Performance Reporting Requirements

Award recipients must submit the following reports: quarterly financial reports, semi-annual performance reports, final financial and performance reports, and an annual audit report (if required). These must follow the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, found at 2 C.F.R. Part 200, or specific conditions of the

award. If reports are late, future funding or fund access may be delayed, and additional reports may be requested in some cases.

L. Termination of Federal Award

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

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

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

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

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

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

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

4. Termination by the Recipient or Subrecipient

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

5. Impacts of Termination

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

6. Notification requirements

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

7. Opportunities to Object and Appeals

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

8. Effects of Suspension and Termination

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

M. Best Practices

While not a requirement in the DHS Standard Terms and Conditions, as a best practice: Entities receiving funds through this program should ensure that cybersecurity is integrated into the design, development, operation, and maintenance of investments that impact information

technology (IT) and/ or operational technology (OT) systems. Additionally, “The recipient and subrecipient must ... take reasonable cybersecurity and other measures to safeguard information including protected personally identifiable information (PII) and other types of information.” 2 C.F.R. § 200.303(e).

N. Payment Information

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

Instructions to Grant Recipients Pursuing Payments

FEMA reviews all grant payments and obligations to ensure allowability in accordance with 2 C.F.R. § 200.305. These measures 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, it will process through FEMA GO and inform recipients accordingly for drawdown purposes. If FEMA disapproves a payment, FEMA will inform the recipient.

Processing and Payment Timeline

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

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

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

Submission Process

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

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

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

10. Other Information

A. Period of Performance Extension

Extensions to the period of performance are allowed.

Recipients should consult with their FEMA Headquarters Preparedness Officer for requirements related to a performance period extension.

B. Other Information

a. *Environmental Planning and Historic Preservation (EHP) Compliance*

See the [Preparedness Grants Manual](#) Section 4.5, which is incorporated by reference into this NOFO, for information on EHP compliance.

b. *Procurement Integrity*

See the [Preparedness Grants Manual](#) Section 6.6, which is incorporated by reference into this NOFO, for information on procurement integrity.

c. Financial Assistance Programs for Infrastructure

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

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

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

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

2. Waivers

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

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

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

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

3. Definitions

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

d. *Mandatory Disclosures*

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

e. *Adaptive Support*

See the [Preparedness Grants Manual](#) Section 4.4, which is incorporated by reference into this NOFO, for information on disability integration.

f. *Record Retention*

See the [Preparedness Grants Manual](#) Section 6.7, which is incorporated by reference into this NOFO, for information on record retention.

g. *Actions to Address Noncompliance*

See the [Preparedness Grants Manual](#) Section 6.8, which is incorporated by reference into this NOFO, for information on actions to address noncompliance.

h. *Audits*

See the [Preparedness Grants Manual](#) Section 6.9, which is incorporated by reference into this NOFO, for information on audits.

11. Appendix A: FWCGP Allowable Activities

Category	Example Activities
Planning	• Developing and enhancing plans and protocols • Conducting assessments • Developing related terrorism and other catastrophic event prevention activities • Development, review, and revision of continuity of operations plans • In accordance with 2 C.F.R. 200.447, reasonable costs of general liability insurance that subrecipients pay or that are required or approved and maintained by the terms and conditions of the federal award
Organization	• Development of whole community partnerships • Tools, resources, and activities that facilitate shared situational awareness between the public and private sectors • Operational overtime associated with increased security measures associated with FIFA World Cup 2026 events, including the match venues, practice venues, fan zones, team hotels, dignitary movements, public transportation nodes, etc. • Operational overtime associated with increased intelligence and information sharing and analysis needs during the conduct of FIFA World Cup 2026
Equipment	• Chemical, Biological, Radiological, Nuclear, and high yield Explosives (CBRNE) operational search and rescue equipment • Personal protective equipment • Cybersecurity enhancement equipment • Physical security enhancement equipment • Inspection and screening services • Critical emergency supplies • Power (e.g., generators, batteries, power cells) • Terrorism incident prevention equipment • Unmanned Aircraft Systems (UAS) • Equipment for detecting and tracking UAS
Training	• Training workshops and conferences • Travel and Supplies • Overtime and backfill for emergency preparedness and response personnel attending DHS/FEMA-sponsored and approved training classes
Exercises	• Design, conduct, and evaluate a HSEEP-compliant exercises • Full- or part-time staff or contractors/consultants • Overtime and backfill for emergency preparedness and response personnel attending HSEEP-compliant exercises

Appendix B: Operational Overtime Costs

In support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism and other catastrophic events, operational overtime costs are allowable for increased

protective security measures at critical infrastructure sites or other high-risk locations and to enhance public safety during mass gatherings and high-profile events. FWGCP funds may be used to support select operational expenses associated with increased security measures in the authorized categories cited in the table below, but this table is not exhaustive. FEMA retains the discretion to approve other types of requests that do not fit within one of the categories of the table.

As directed by Section 2008(b)(2) of the Homeland Security Act of 2002 (codified as amended at 6 U.S.C. § 609(b)(2)), FWGCP recipients and subrecipients may not use more than 50% of their total award amount to pay for personnel activities unless a waiver is approved by FEMA. ***Recognizing that 94% of these funds will be used to support operational overtime activities, when a state submits a grant application indicating that more than 50% of the funding will be allocated to personnel costs, FEMA will treat the grant application as a formal request for a waiver of the 50% limitation. FEMA's subsequent awarding of the grant will constitute approval of the waiver. A separate waiver request will not be necessary.***

Authorized Operational Overtime Categories

	Category	Description
1	National Terrorism Advisory System (NTAS)	Security measures in response to an increase in the threat level under the NTAS to an “elevated” or “imminent” alert status. FEMA Information Bulletin No. 367, Impact of National Terrorism Advisory System on Homeland Security Grant Programs , remains applicable; therefore, advance authorization from FEMA is not required. Refer to National Terrorism Advisory System Homeland Security (dhs.gov) for additional information on the NTAS.
2	National Security Special Event (NSSE)	Security measures for a <u>designated</u> NSSE. NSSEs are events of national or international significance deemed by DHS to be a potential target for terrorism or other criminal activity.
3	Special Event Assessment Rating (SEAR) Level 1 through Level 4 Events	Security measures required for SEAR Level 1 through Level 4 events as designated by DHS and included in the DHS National Special Events List, as defined below: • SEAR 1: A significant event with national and/or international importance that may require extensive federal interagency support. • SEAR 2: A significant event with national and/or international importance that may require some level of federal interagency support. • SEAR 3: An event of national and/or international importance that requires only limited federal support. • SEAR 4: An event with limited national importance that is managed at state and local level.
	Category	Description

		NOTE: In cases where a threat of terrorism can be associated with a SEAR Level 5 event, the event planners should coordinate with their state or territory Homeland Security Advisor to seek re-adjudication of the SEAR rating. Operational overtime for security measures associated with such events will be considered for approval by FEMA if re-adjudication results in a SEAR 1 through 4 rating.
4	States of Emergency	Declarations of states of emergency by the Governor <u>associated with a terrorism-related threat or incident</u> . This excludes Presidentially declared major disasters or emergencies where federal funding support for the proposed grant-funded activity is made available through the FEMA Public Assistance program or other federal disaster grants.
5	National Critical Infrastructure Prioritization Program (NCIPP)	Protection of Level 1 and Level 2 facilities identified through DHS's NCIPP <u>based on a terrorism-related threat</u> to critical infrastructure.
6	Directed Transit Patrols	Targeted security patrols in airports and major transit hubs <u>based on a terrorism-related threat</u> to transportation systems.
7	Other Related Personnel Overtime Costs	Overtime costs may be authorized for personnel assigned to directly support any of the security activities relating to the categories above. Examples include firefighters and emergency medical services personnel; public works employees who may be responsible for installing protective barriers and fencing; public safety personnel assigned to assist with event access and crowd control; emergency communications specialists; backfill and overtime for staffing state or major urban area fusion centers; state Active Duty National Guard deployments to protect critical infrastructure sites, including all resources that are part of the standard National Guard deployment package (note: consumable costs, such as fuel expenses, are not allowed except as part of the standard National Guard deployment package); contract security services for critical infrastructure sites; participation in Regional Resiliency Assessment Program activities, increased border security activities in coordination with U.S. Border Patrol, etc.
8	Operational Support to a Federal Agency	Overtime costs are allowable for personnel to participate in information, investigative, and intelligence sharing activities related to homeland security/terrorism preparedness and specifically requested by a federal agency. Allowable costs are limited to overtime associated with federally requested participation in eligible activities, including anti-terrorism task forces, Joint Terrorism Task Forces (JTTFs), Area Maritime

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

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

Administration of Operational Overtime Requests

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

state that fact. FEMA will then plan for the sharing of classified information through official channels;

- Post-event operational overtime requests will only be considered on a case-by-case basis, where it is demonstrated that exigent circumstances prevented submission of a request in advance of the event or activity;
- Under no circumstances may FEMA grant funding be used to pay for costs already supported by funding from another federal source;
- FEMA will consult and coordinate with appropriate DHS components as necessary to verify information used to support operational overtime requests.