The U. S. Department of Homeland Security (DHS) Notice of Funding Opportunity (NOFO) Fiscal Year 2025 Emergency Management Performance Grant Program

Release Date: Jul 28, 2025

Download the NOFO.

All entities wishing to do business with the federal government must have a unique entity identifier (UEI). The UEI number is issued by the system. Requesting a UEI using System for Award Management (SAM.gov) can be found at: https://sam.gov/content/entity-registration.

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

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Basic Information

1. Agency Name	U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA)
2. NOFO Title	Fiscal Year 2025 Emergency Management Performance Grant (EMPG) Program
3. Announcement Type	Initial
4. Funding Opportunity Number	DHS-25- GPD-042-01-99



5. Assistance Listing Number	97.042
6. Expected Total Funding	\$319.5 million See Appendix D for the FY 2025 EMPG Program Allocations
7. Anticipated Number of Awards	56 awards
8. Expected Award Range	\$825,152 - \$24,392,241
9. Projected Application Start Date	07/28/25 09:00 a.m. Eastern Time (ET)
10. Projected Application End Date	08/11/2025 05:00 p.m. Eastern Time (ET)
11. Anticipated Funding Selection Date	No later than August 23, 2025



12. Anticipated Award Date	No later than September 30, 2025
13. Projected Period of Performance Start Date	10/01/2024
14. Projected Period of Performance End Date	09/30/2027
15. Executive Summary	The Fiscal Year (FY) 2025 Emergency Management Performance Grant (EMPG) Program is one of the grant programs that constitute DHS/FEMA's focus on all-hazards emergency preparedness, including the evolving threats and risks associated with natural disasters. EMPG Program funding is awarded to the 56 states and territories using a population-based allocation methodology. The main purpose of the program is to support the emergency management needs of state, local, tribal, and territorial governments, primarily through investments in planning, training, and exercise activities and to help cover the salaries of emergency management personnel.



16. Agency Contact

a. Program Office Contact

FEMA has assigned region specific Preparedness Officers for the EMPG Program. If you do not know your Preparedness Officer, reference FEMA Regional Grant Program Office or contact FEMA Grants News by e-mail at fema.dhs.gov OR by phone at (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET.

b. FEMA Grants News

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.dhs.gov OR (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET.

c. Grant Programs Directorate (GPD) Award Administration Division

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

d. 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 /fema-regional-contacts.

e. Civil Rights

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

f. Environmental Planning and Historic Preservation

The FEMA Office of Environmental Planning and Historic Preservation (OFHP) provides guidance and information about



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Eligibility





Eligible
 Entities/Entity
 Types

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

a. Applicants

1. Eligible Applicants

State or territorial governments (the State Administrative Agency [SAA] or the state's Emergency Management Agency [EMA]).

2. Applicant Eligibility Criteria

All 56 states and territories (collectively "state or territory") are eligible to apply for FY 2025 EMPG Program funds. Either the SAA or the EMA is eligible to apply directly to FEMA for EMPG Program funds on behalf of each state or territory. However, only one application will be accepted from each state or territory.

b. Subapplicants

Subapplicants and subawards are allowed.

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.

See the <u>Preparedness Grants Manual</u> for further information on requirements or restrictions related to subawards/subrecipients.

c. All Recipients – Compliance with Federal Immigration Laws

An immigration term and condition may be material to the Department of Homeland Security's decision to make this grant award, and the Department of Homeland Security may take any remedy for noncompliance, including termination, if the state or territorial recipient or any local government subrecipient fails to comply with this term and condition. No final agency determination



2. 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 EMPG made in support of the national priorities must fall into the categories of planning, organization, equipment, training, or exercises (POETE).

Please see Appendix A for more information on allowable costs.

For costs that do not explicitly fit within one of the mentioned categories, recipients should consult their Regional EMPG Program Manager to determine whether the cost is allowable under the award. In addition to the descriptions and references in Appendix A, applicants should refer to the Preparedness Grants Manual.



 Requirements for Personnel, Partners, and Other Parties An application submitted by an otherwise eligible non-federal entity (i.e., the applicant) may be deemed ineligible when the person that submitted the application is not: 1) a *current employee, personnel, official, staff, or leadership* of the non-federal entity; and 2) *duly authorized to apply* for an award on behalf of the non-federal entity at the time of application.

Further, the Authorized Organization Representative (AOR) must be a duly authorized current employee, personnel, official, staff or leadership of the recipient and *provide an email address* unique to the recipient at the time of application and upon any change in assignment during the period of performance. Consultants or contractors of the recipient are not permitted to be the AOR of the recipient.

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

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

4. Maximum Number of Applications The maximum number of applications that can be submitted is:

1. One per state or territory.



5. Additional Restrictions

Applicants/subapplicants or recipients/subrecipients are required to certify their compliance with federal statutes, DHS directives, policies, and procedures.

a. National Incident Management System (NIMS) Implementation

Applicants/subapplicants or recipients/subrecipients are required to certify their compliance with federal statutes, DHS directives, policies, and procedures.

Prior to allocation of any federal preparedness awards, recipients must ensure and maintain adoption and implementation of NIMS. The list of objectives used for progress and achievement reporting is on FEMA's website at https://www.fema.gov/emergency-

Relatedly, as a post-award requirement for FY 2025, all recipients and subrecipients in the 50 states and the District of Columbia must work toward achieving the Phase 3 National Qualification System (NQS) implementation objectives. In addition to executing their Implementation Plan, all jurisdictions shall work towards issuing Position Task Books to designated incident workforce personnel and ensure those personnel show progress in working toward task endorsements and minimum training requirements.

Please see the <u>Preparedness Grants Manual</u> for more information on NIMS and NQS implementation requirements.

b. Public Alert and Warning Preparedness

managers/nims/implementation-training.

When applying EMPG funding to exercises, grant recipients and subrecipients shall include exercise objectives centered on practicing and validating their plans and procedures for sending emergency alerts to the public through the FEMA Integrated Public Alert and Warning System (IPAWS). Exercise objectives for public alert and warning should include practice of analysis and decision-making in sending an alert to the public; public alert message writing; procedures for coordination, review, and approval to send the alert; and practice in sending an alert though the IPAWS. Moreover, recipients should clearly outline how they will integrate public alert and warning tests into



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6. References for Please see the following references provided below: Eligibility 1. "Responsiveness Review Criteria" subsection Factors within 2. "Financial Integrity Criteria" subsection the NOFO 3. "Supplemental Financial Integrity Criteria and Review" subsection 4. FEMA may/will request financial information such as Employer Identification Number (EIN) and bank information as part of the potential award selection. This will apply to everyone proposed, including subrecipients. Applicants and subapplicants selected for this award must 7. Cost Sharing commit to an acceptable cost share agreement. Otherwise, they Requirement will not be funded.



8. Cost Share Description, Type and Restrictions

The FY 2025 EMPG Program has a cost-share requirement. The recipient contribution can be cash (hard match) or third-party inkind (soft match). Eligible EMPG Program applicants shall agree to make available non-federal funds to carry out an EMPG Program award in an amount not less than 50% of the total project cost. In other words, the federal share applied toward the EMPG Program budget shall not exceed 50% of the total budget as submitted in the application and approved in the award. If the total project ends up costing more, the recipient is responsible for any additional costs; if the total project ends up costing less, the recipient may owe FEMA an amount required to ensure that the federal cost share is not in excess of 50%. A state must at least equally match (cash or third party in-kind) the federal contribution pursuant to sections 611(j) and 613(a) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Pub. L. No. 93-288), as amended, (42 U.S.C. §§ 5121 et seq.). Unless otherwise authorized by law, federal funds cannot be matched with other federal funds. The recipient's contribution should be specifically identified. These non-federal contributions have the same eligibility requirements as the federal share.

DHS/FEMA administers cost-matching requirements in accordance with 2 C.F.R. § 200.306. To meet matching requirements, the recipient contributions must be verifiable, reasonable, allowable, allocable, and necessary under the grant program, and in compliance with all applicable federal requirements and regulations.



9. Cost Sharing Calculation Example

For example, if the federal award were at a 50% cost share and the total approved budget cost was \$100,000, then:

- Federal share is 50% of \$100,000 = \$50,000
- Recipient share is 50% of \$100,000 = \$50,000

However, with this example, if the total cost ended up being \$120,000, the federal share would remain at 50% of the total approved budget at the time of application of \$100,000, or \$50,000. If the total cost ended up being \$80,000, then the 50% federal share would decrease to \$40,000, and the recipient cost share would be \$40,000.

In accordance with 48 U.S.C. § 1469a, cost-match requirements are waived for the insular areas of the U.S. territories of American Samoa, Guam, the U.S. Virgin Islands, and the Commonwealth of the Northern Mariana Islands.

Required information for verifying Cost Share

Applicants should submit the following cost share (or match) documents:

 A detailed description of the source of the cost share/matching funds. If funds or services are to be provided by a third party for in-kind match, a dated letter of commitment is required to document the donation.

Please see the "Application Format and Contents" section for more details.

Maintenance of Effort

Not applicable.

Program Description

A. Background, Program Purpose, and Program History



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The Fiscal Year (FY) 2025 Emergency Management Performance Grant (EMPG) Program provides funding to states or territorial governments to enhance their emergency management capabilities. The funding allows recipients to address risks and strengthen core emergency management functions.

Last year, all 56 states and territories were awarded EMPG Program funding, as were two Compact of Free Association nations. For a full list of FY 2024 recipients, please refer to Information Bulletin (IB) 517a.

B. Goals, Objectives, and Priorities

Goals: The goal of the FY 2025 EMPG Program is to provide funds to assist state, local, tribal, and territorial emergency management agencies to implement the National Preparedness System (NPS) and to support the Goal of a secure and resilient nation.

<u>Objectives</u>: The EMPG funds will address the increasing range and complexity of disasters, support the wide variety of communities we serve, and complement the nation's growing expectations of the emergency management community by meeting the following objectives:

- Building or sustaining those preparedness capabilities that are identified as high priority through the Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) process and other relevant information sources (see Priorities section below);
- 2. Closing capability gaps that are identified in the state or territory's most recent SPR; and
- 3. Building continuity capabilities to ensure governmental essential functions and services resilience.

DHS/FEMA requires EMPG Program recipients to complete a THIRA/SPR. Additional information on the THIRA/SPR process, including other NPS tools and resources, can be found at <u>National Preparedness System | FEMA.gov</u> and the <u>Preparedness Grants Manual (FM-207-23-001)</u>.

<u>Priorities</u>: All EMPG Program applicants are required to develop and submit a Work Plan as described in <u>Appendix B</u> below. All EMPG Program Work Plans will require final approval by the applicable FEMA Regional Administrator (RA). The



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applicant must work with the RA or designated Regional EMPG Program Manager to ensure that appropriate regional and state/territory priorities are effectively addressed in the Work Plan.

Priorities, and associated EMPG Program-funded projects, must be mutually agreed to by the recipient and RA. Identification of priorities and development of the EMPG Program Work Plan should involve a collaborative negotiation process through which a common set of priorities will emerge based on a combination of state/territory priorities, regional priorities, and national priorities (as outlined in the table below). State/territory priorities should be primarily driven by the THIRA/SPR process, as explained in the Objectives section above. Other relevant information sources, such as: 1) after-action reports (AARs) following exercises or real-world events; 2) audit and monitoring findings; 3) Hazard Mitigation Plans; and/or 4) other deliberate planning products may also be used to inform state/territory priorities. Additionally, states and territories are urged to consider the funding needs of local governments when developing their funding priorities. Regional priorities will be determined by the RA based on their unique knowledge of the region's preparedness and emergency management needs, including broader insight into common capability gaps across the region and potential opportunities for economies of scale to capitalize on those commonalities. Regional priorities should also be based on an analysis of THIRA/SPR data and other information sources provided by the states/territories in their area(s) of responsibility. Ideally, all EMPG Program funded projects, as outlined in the approved FY 2025 EMPG Program Work Plan, will support the priorities identified through this approach.

Through the priority development and negotiation process, each region and state/territory should discuss state/territory, regional, and national priorities. Converging their processes for identifying priorities and reaching consensus on a common set of shared priorities helps the region and each state/territory to realize economies of scale. As a result of these negotiations, the region and state/territory should reach a consensus on three-to-five priorities each recipient will focus on addressing and improving in its EMPG Program Work Plan.

Federal regulations outlined in 2 C.F.R. Part 200 require federal awarding agencies to measure recipient performance to show achievement of program goals and objectives, share lessons learned, improve program outcomes, and foster adoption of promising practices (see 2 C.F.R. § 200.301, Performance Measurement). For FY 2025, there is a continuing emphasis on priorities-based



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investments. Additionally, recipients must set outcome-oriented performance goals for closing capability gaps related to the three-to-five agreed-upon priorities, aligning funding with high-priority strategic preparedness needs. An outcome-oriented approach will allow recipients to define success, benchmark their projects, and measure their progress in building capability. Recipients will be able to use this to generate a feedback cycle. If projects are not achieving desired outcomes, recipients will have a basis for revisiting plans and assessments and adjusting their projects and other investments.

When developing state/territory priorities, applicants should consider the following national priorities:

- Extreme Weather Resilience; and
- Readiness

a. Extreme Weather Resilience

Extreme weather is one of the greatest challenges facing emergency managers today. To meet this challenge, the emergency management field needs to anticipate the increasing demands generated by more extreme and frequent disasters, from wildfires and coastal storms to inland flooding. Additionally, emergency managers must learn to manage and support weather-related emergencies such as drought and extreme heat. The emergency management community must aim to strengthen capabilities for extreme weather events by better understanding extreme weather risks and identifying mitigation strategies and other preparedness actions necessary to address those risks. This includes expanded training and capacity-building for emergency managers and first responders at the state and local level. Additionally, emergency managers at the federal, state, territorial, tribal, and local levels need to undertake targeted efforts to increase resilience in the most disaster vulnerable communities.

Extreme weather resilience requires a whole-community approach. The whole community is an inclusive approach to emergency preparedness and management through the inclusion of individuals and families, including those with access and functional needs; businesses; faith-based and community organizations; non-profit groups; schools and academia; media outlets; and all levels of government, including state, local, tribal, territorial, and federal partners. Extreme weather events can cause both acute and chronic impacts; communities



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must be resilient against threats as varied as extreme flooding, drought, hurricanes, and wildfires. Community resilience requires expanding partnerships, especially with community-based organizations that are on the ground before disasters strike and well after. Emergency management partners must support the preparedness needs of disaster vulnerable communities to mitigate the impacts of future disasters.

Many communities are faced with aging infrastructure, which can increase risk from major disasters. To have the greatest impact, FEMA encourages smart investments in system-based, community-wide projects to protect those with the most severe and persistent risk. Communities can better target investments to the most transformational projects when they better understand the unique risks posed by extreme weather events.

The future disaster environment will not resemble that of the past, or even what is experienced today. To build long-term resilience, communities must understand their future risk and have the resources and capacity to reduce that risk. Even within the same geographic area, different communities will face differing levels of risk due to their unique demographic, economic, and physical characteristics. It is important for the emergency management community to develop capacity to access and interpret accurate information about this localized risk, specifically in light of future conditions. This information will help communities better understand their own risks and identify the most appropriate resilience actions.

The more we build our partner's resilience, the more prepared our nation will be, which positively influences the impact and severity of significant events. This approach enables disaster response efforts that are locally led, state managed, and federally supported.

b. Readiness

As disasters become more frequent, severe, and complex, the demands placed upon the emergency management community have increased dramatically. To adapt to this trend, FEMA and the emergency management community must expand our approach to readiness, preparedness, continuity, and resiliency by increasing the overall emergency management capabilities at the state and local government level, as well as the private sector, the nonprofit sector, and among individuals. The National Capability Targets provide a shared vision of the staff,



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expertise, tools, and resources required to build a prepared nation. Aligning state and local readiness plans to these targets will ensure agencies can continuously support the needs and priorities identified by whole community partners, in addition to continuity of government across all hazards.

Disaster mitigation, preparedness, response, and recovery are not the responsibility of just one agency. Rather, these functions are a shared responsibility requiring coordination of federal agencies, private and social sectors, state, local, tribal, and territorial governments, and other partners. The ability to support communities begins with how emergency management agencies help them prepare before a disaster occurs. This includes preparing for evolving concurrent, complex disasters, including response to potential national security emergencies. Through better coordination of pre-disaster programs, we can all help communities identify, prioritize, and plan to address their specific community-based threats, identify hazards and risks, and mitigate capability gaps. Together, federal assistance can be targeted to address areas of greatest national risk and increase support to the most at-risk communities thereby improving our Nation's readiness.

c. Additional Guidance on EMPG Program Priorities

Recognizing that every state and territory has its own unique preparedness and emergency management needs, the national priorities outlined above should inform the identification of state/territory priorities and regional priorities when developing the common set of mutual priorities as agreed upon by the RA and each state/territory. Ideally, the regional and state/territory priorities will complement and support the national priorities. The only mandate stemming from these national priorities is the requirement for all EMPG Program recipients to develop and maintain a Distribution Management Plan as an annex to their existing Emergency Operations Plan (EOP). See the Logistics Planning section of the Preparedness Grants Manual for additional details on this requirement.

The table below provides a high-level breakdown of the national priority areas, the associated core capabilities, as well as examples of project types for each area. Please see Appendix A of this NOFO for more detailed information about allowable costs for projects.



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National Priority Area Associated Core Capabilities

Examples of Allowable Activities



Extreme Weather Resilience

- Community Resilience
- Infrastructure Systems
- Long-Term Vulnerability Reduction
- Planning
- Risk and Disaster Resilience Assessment
- Threats and Hazards Identification
- Development of/updates to disaster housing plans to incorporate and address weather-related data/projections/risks (e.g., ensure housing is not placed in potentially weather-related impacted areas and that housing solutions are weather-related resilient)
- Establishment of weather-related or resiliency positions within emergency management offices to assess weatherrelated risks, develop mitigation strategies, and support updating of EOPs
- Development of evacuation plans in accordance with weather-related exacerbated risk (e.g., mass evacuation during catastrophic fast-moving events, like wildfires)
- Establishment of risk communication plans to inform all residents (including those with access and functional needs) about weather-related risks (e.g., what the communities can do at a local and individual level to prepare) and potential evacuations
- Development of internal plans (including response and recovery) that incorporate weather-related impact on emergency management resources (e.g., personnel, logistics)
- Development of weather-related literacy plans to enable communities to understand and prepare for their weather-related risks
- Conduct exercises that incorporate weather-related considerations into response and recovery efforts to increase weather-related literacy and prepare communities to respond to and recover from extreme weather disasters
- Incorporation of weather-related considerations into risk assessments



Readiness:

Catastrophic Disaster Housing

- Housing
- Planning
- Situational Assessment
- Infrastructure Systems
- Development of state-led disaster housing task force plan
- Establishment of State Disaster Recovery Coordinator
- Completion of State Housing Strategy template
- Assessment of accessible housing needs, including the unique risks and needs of disaster vulnerable communities

Readiness:

Disaster Financial Management

- Planning
- Risk
 Management for
 Protection
 Programs and
 Activities
- Risk and Disaster Resilience Assessment
- Community Resilience
- Economic Recovery

- Development of a plan for the sequencing of federal, nonprofit, and state disaster programs
- Development of a Disaster Financial Management Plan



Readiness:

Evacuation Plan/Annex

- Planning
- Risk
 Management for
 Protection
 Programs and
 Activities
- Risk and Disaster Resilience Assessment
- Threats and Hazards Identification
- Operational Coordination
- Long-Term Vulnerability Reduction
- CriticalTransportation
- Infrastructure Systems

- Assessment of evacuation capabilities and needs, including ensuring accessibility and effective communication for persons with disabilities and others with access and functional needs, and integration of these requirements into evacuation plans
- Development of/updates to evacuation plans
- Improvement of evacuation capabilities, such as transportation systems to support contraflow lanes
- Conduct evacuation training and exercises
- Development of public awareness campaigns support evacuation plans
- (See https://www.fema.gov/emergency-managers/national-preparedness/plan/evacuation-shelter-in-place for additional guidance)

Readiness:

Logistics – Distribution Management Planning

- Logistics and Supply Chain Management
- Supply Chain Integrity and Security
- Development of/updates to a Distribution Management Plan that addresses:
- State/local staging site plans
- State/local commodity point of distribution site plans
- Staging and Point of Distribution staffing strategies/plans
- Transportation strategies/plans
- Resource sourcing and accountability strategies/plans
- Provision of critical emergency supplies for high risk communities



Readiness: Continuity of Government

- Planning
- Operational Coordination
- All other core capabilities
- Continuity planning products for the continuance of essential functions and associated leadership
- Risk-based needs assessments based on the THIRA/SPR to inform risk mitigation efforts for ensuring continuity of essential functions and services
- Policy and legislation such as through executive orders and statutes setting forth resilience requirements for continuity of essential functions and services
- Public and private sector outreach and messaging regarding continuity resilience strategies



Readiness:

Resilient Communications

- Operational Communications
- Planning
- Public Information and Warning
- Operational Coordination
- Intelligence and Information Sharing
- Cybersecurity
- Physical Protective Measures
- Long-Term Vulnerability Reduction
- Risk and Disaster Resilience Assessment
- Threats and Hazards Identification
- Infrastructure Systems

- Development of Statewide
 Communication Interoperability Plans,
 Tactical Interoperable Communications
 Plans, and Standard Operating
 Procedures that address continuity and recovery of emergency communication systems
- Conduct risk and vulnerability assessments associated with emergency communications systems, to include cybersecurity risks
- Adoption of cybersecurity performance goals (<u>Cross-Sector Cybersecurity</u> Performance Goals | CISA)
- Conduct National Incident Management System (NIMS) compliant training, exercise, and evaluation activities to test emergency communications capabilities, to include testing of resiliency and continuity of communications
- Physical hardening of infrastructure systems and support emergency communications

C. Program Rationale

The stated goals, objectives, and priorities of the EMPG Program support Section 662 of the *Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA)*, Pub. L. No. 109-295 (codified as amended at 6 U.S.C. § 762); the *Robert T. Stafford Disaster Relief and Emergency Assistance Act*, Pub. L. No. 93-288 (1974) (codified as amended at 42 U.S.C. §§ 5121-5207); the *Earthquake Hazards Reduction Act of 1977*, Pub. L. No. 95-124 (codified as amended at 42 U.S.C. §§ 7701-7709); and the *National Flood Insurance Act of 1968*, Pub. L. No. 90448 (codified as amended at 42 U.S.C. §§ 4001-4131).

D. Federal Assistance Type



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E. Performance Measures and Targets

Performance metrics for this program are as follows:

- Performance Measure 1: Percentage of capability-building projects that align to capability gaps identified by states, territories, and urban areas in their THIRA/SPR submissions (50%).
- Performance Measure 2: Percentage of high priority capabilities, as identified in THIRA/SPR submissions, that are built or sustained prior to award closeout (50%).
- Performance Measure 3: Percentage of capability-building projects that address a high priority core capability as identified by THIRA/SPR submissions (50%).
- Performance Measure 4: Percentage of projects that build or sustain capabilities relating to the EMPG Program national priority areas and RA agreed-upon priorities (80%).
- Performance Measure 5: Percentage of Planning, Training, and/or Exercise related projects that align with closing address capability gaps as identified and documented in the state/territory's most recent THIRA/SPR submission, Mitigation Plan, AARs, Audit/Monitoring Findings, Continuity Assessments, or Other Deliberate Plans (50%).

FEMA will analyze the above metrics through the review of state/territory SPR submissions, EMPG Program Work Plans, and required programmatic reports.

F. Program-Specific Unallowable Costs

Specific unallowable costs for EMPG include:

- 1. Grant funds may not be used for the purchase of firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with weapons installed;
- 2. Expenditures for weapons systems and ammunition;
- Costs associated with hiring, equipping, training, etc. sworn public safety
 officers whose primary job responsibilities include fulfilling traditional public
 safety duties such as law enforcement, firefighting, emergency medical
 services, or other first responder duties;



- 4. Costs that supplant traditional public safety positions and responsibilities;
- 5. Activities and projects unrelated to the completion and implementation of the EMPG Program; or
- Clothing used for everyday wear by emergency management employees or other personnel.

Recipients should consult with their Regional EMPG Program Manager prior to making any investment that does not clearly meet the allowable expense criteria established in this NOFO and the Preparedness Grants Manual.

G. General Funding Requirements

Costs charged to federal awards (including federal and non-federal cost share funds) must comply with applicable statutes, rules and regulations, policies, this NOFO, the <u>Preparedness Grants Manual</u>, 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).

See the <u>Preparedness Grants Manual</u> for more information on funding restrictions and allowable costs.

H. Indirect Costs (Facilities and Administrative Costs)

Indirect costs are allowed for recipients and subrecipients.

Indirect costs (IDC) are costs incurred for a common or joint purpose benefitting more than one cost objective and not readily assignable to specific cost objectives without disproportionate effort. Applicants with a current negotiated IDC rate



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

a. Unrecovered Indirect Costs

In accordance with 2 C.F.R. § 200.306(c) "[u]nrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with the prior approval of the Federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the Federal award and the amount which could have been charged to the Federal award under the non-Federal entity's approved negotiated indirect cost rate." Therefore, unrecovered indirect costs may be applied to meet cost share requirements of the EMPG Program grant with the approval of the Regional Grants Division. To meet the cost sharing requirements, the recipient's indirect costs contributions must be verifiable, reasonable, allocable, necessary, and otherwise allowable under the grant program, and in compliance with all applicable Federal requirements and regulations.

I. Management and Administration (M&A) Costs

Per FEMA policy, M&A costs are allowed for both states and territories and local-level Emergency Management Agencies (EMAs). A state or territory EMA may use up to 5% of the EMPG Program award for M&A purposes. In addition, local EMAs may retain and use up to 5% of the amount they receive from the state for local M&A purposes. If the SAA is not the state or territory-level EMA, the SAA is not eligible to retain funds for M&A costs.



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M&A activities are those defined as directly relating to the management and administration of EMPG Program funds, such as financial management, reporting, and program and financial monitoring. Some examples of M&A costs include grants management training for M&A staff, equipment and supplies for M&A staff to administer the EMPG Program grant, travel costs for M&A staff to attend conferences or training related to the EMPG Program, travel costs for the M&A staff to conduct subrecipient monitoring, contractual services to support the M&A staff with M&A activities, and auditing costs related to the grant award to the extent required or permitted by statute or 2 C.F.R. Part 200. Characteristics of M&A expenses can include the following: 1) direct costs that are incurred to administer a particular Federal award; 2) identifiable and unique to each Federal award; 3) charged based on the activity performed for that particular Federal award; and 4) not duplicative of the same costs that are included in the approved Indirect Cost Rate Agreement, if applicable.

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. They are directly related to managing and administering the award, such as financial management, reporting, and program and financial monitoring. It should be noted that salaries of state and local emergency managers are not typically categorized as M&A costs unless the state or local EMA chooses to assign personnel to specific M&A activities.

J. Pre-Award Costs

Pre-award costs are not allowed.

K. Beneficiary Eligibility

There are no program requirements. See <u>Section 2</u> for additional eligibility information. This NOFO and any subsequent federal awards create no rights or causes of action for any beneficiary.

L. Participant Eligibility



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

M. Authorizing Authority

Section 662 of the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA), Pub. L. No. 109-295 (codified as amended at 6 U.S.C. § 762); the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 93-288 (1974) (codified as amended at 42 U.S.C. §§ 5121-5207); the Earthquake Hazards Reduction Act of 1977, Pub. L. No. 95-124 (codified as amended at 42 U.S.C. §§ 7701-7709); and the National Flood Insurance Act of 1968, Pub. L. No. 90448 (codified as amended at 42 U.S.C. §§ 4001-4131).

N. Appropriation Authority

Full-Year Continuing Appropriations and Extensions Act, 2025, Pub. L. No. 119-4, § 1101.

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 <u>Preparedness Grants Manual</u> for information on prohibitions on expending funds on covered telecommunications and surveillance equipment and services.

Application Contents and Format

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

Not applicable.

B. Application Content and Format

Not applicable.



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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)
 - For construction under an award, submit SF-424C, Budget Information (Construction), in addition to or instead of SF-424A
- SF-424B, Standard Assurances (Non-Construction)
 - For construction under an award, submit SF-424D, Standard Assurances (Construction), in addition to or instead of SF-424B
- SF-LLL, Disclosure of Lobbying Activities

D. Program-Specific Required Documents and Information

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

■ EMPG Program Work Plan

a. EMPG Program Work Plan

All EMPG Program applicants must develop and submit a Work Plan. All EMPG Program applicants are strongly encouraged to use the FY 2025 EMPG Program Work Plan Template provided on <u>Grants.gov</u> to submit the required Work Plan, which outlines the state or territory's emergency management sustainment and enhancement efforts, including new and ongoing activities and projects, proposed for the EMPG Program period of performance.

All EMPG Program Work Plans will require final approval by the RA. The applicant must work with the RA or designated Regional EMPG Program Manager to ensure that the common set of agreed-upon priorities, as explained in the Priorities section above, are properly addressed in the EMPG Program Work Plan.



Regions can request additional budget detail information, if necessary, to ensure the proposed projects and associated costs are in alignment with the agreed-upon priorities, address the identified need/capability gaps, and are in compliance with the cost principles.

See the EMPG Program Work Plan appendix in <u>Appendix B</u> below for additional information on Work Plan requirements.

E. Post-Application Requirements for Successful Applicants

Not applicable.

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 Employer Identification Number (EIN) from the Internal Revenue Service (IRS);
- 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;



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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 <u>2 C.F.R.</u> § <u>25.110(a)(2)(iv)</u>, 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 <u>fema-grants-news@fema.dhs.gov</u> 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.



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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 <u>2 C.F.R. § 25.200</u>, 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

08/11/25 05:00:00 PM Eastern Time

C. Pre-Application Requirements Deadline

Not applicable.

D. Post-Application Requirements Deadline

Not applicable.



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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.

Intergovernmental Review

A. Requirement Description and State Single Point of Contact

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

Application Review Information

A. Threshold Criteria

Only State or territorial governments (the State Administrative Agency [SAA] or the state's Emergency Management Agency [EMA]) are authorized to submit EMPG applications to FEMA.

a. Unaffiliated or Unauthorized Representatives

Applications submitted by individuals who are not 1) a current employee, personnel, official, staff, or leadership of the non-federal entity; and 2) duly authorized to apply for an award on behalf of the non-federal entity at the time of application (e.g. consultants or contractors acting on behalf of an organization) will be deemed ineligible.



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b. Organizations Not Registered in SAM.gov

Applicants that fail to register and maintain an active profile in SAM.gov, or those without a UEI, are not eligible to receive funding.

B. Application Criteria

a. Programmatic Criteria

Application evaluation for the EMPG Program focuses on the EMPG Program Work Plan. Please see sections 3.B., 4.D., and the EMPG Program Work Plan in Appendix B for more information on Work Plan requirements and process.

b. Review and Selection Process

Recipients must comply with all administrative requirements described herein including the submission of the EMPG Program Work Plan and other application materials as required. The following process will be used to make awards for the EMPG Program:

1. Initial Review

The Regional EMPG Program Managers conduct all pre-award reviews for EMPG Program grant awards. All EMPG Program Work Plans require final approval by the RA. Prior to submission of the EMPG Program Work Plan, the applicant must work with the RA or designated Regional EMPG Program Manager to ensure that regional or state priorities are properly addressed in the EMPG Program Work Plan.

Funds for recipients will not be released until such Work Plan is received, reviewed, and approved by DHS/FEMA. Recipients will be notified by the RA or their Regional EMPG Program Manager should any component of the EMPG Program application require additional information.



2. Overall Review

FEMA Regions are responsible for reviewing submitted applications. Each Regional EMPG Program Manager reviews the FY 2025 EMPG Program Work Plans for their states or territories to assess the proposed EMPG Program investments against the agreed upon priorities. This will include a financial review using the following criteria:

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

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. FEMAis 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. §



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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 <u>2 C.F.R.</u> § <u>200.206</u>, FEMA will consider any comments by the applicant.

E. Reviewers and Reviewer Selection

Reviewers for the Emergency Management Performance Grant (EMPG) are typically selected from within FEMA, specifically the Regional EMPG Program Managers, who are subject matter experts in grant management and emergency management. They conduct reviews based on regional or state priorities and ensure compliance with program requirements. To avoid conflicts of interest, FEMA adheres to federal regulations, including 2 C.F.R. Part 200, which mandates financial and ethical standards, and reviewers must disclose potential conflicts before participating.

F. Merit Review Process

Not applicable.

G. Final Selection

FEMA uses a population-based allocation formula as dictated by statute. See Appendix D for details.

Award Notices

A. Notice of Award

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

By submitting an application, applicants agree to comply with the prerequisites stated in this NOFO, the <u>Preparedness Grants Manual</u>, and the material terms and conditions of the federal award, should they receive an award.



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

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

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

B. Pass-Through Requirements

Each state or territory shall obligate 100% of its total EMPG Program allocation to the designated state-level EMA. If the SAA is also the EMA, this requirement is automatically met. If the SAA is a separate agency or has a separate budget process, then all EMPG Program funds must be obligated to the EMA within 15 days of the grant award date. In instances where the state EMA is making subawards to local jurisdictions, DHS/FEMA expects the state EMA to make these subawards as expeditiously as possible.

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

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

E. Notification to Unsuccessful Applicants

Unsuccessful Applicants will be notified through the FEMA GO system after all successful awards have been made, but not sooner than October 1st of this award cycle. Applicants may contact the program office for additional feedback.



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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.

C. Financial Reporting Requirements



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See the <u>Preparedness Grants Manual</u> for information on financial reporting requirements.

D. Programmatic Performance Reporting Requirements

See the <u>Preparedness Grants Manual</u> for information on performance reporting requirements.

E. Closeout Reporting Requirements

See the <u>Preparedness Grants Manual</u> 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

See the <u>Preparedness Grants Manual</u> for information on disclosing information per 2 C.F.R. § 180.335.

G. Reporting of Matters Related to Recipient Integrity and Performance

See the <u>Preparedness Grants Manual</u> for information on reporting of matters related to recipient integrity and performance.

H. Single Audit Report

See the <u>Preparedness Grants Manual</u> for information on single audit reports.

I. Monitoring and Oversight

Per <u>2 C.F.R.</u> § 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.



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

J. Program Evaluation

Title I of the Foundations for Evidence-Based Policymaking Act of 2018, Pub. L. No. 115-435 (2019) (Evidence Act), 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.



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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

Not applicable.

L. Termination of the Federal Award

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:
- If DHS/FEMA, in its sole discretion, determines that a specific award objective is ineffective at achieving program goals as described in this NOFO;
- 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



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agency priorities;

- If DHS/FEMA, in its sole discretion, determines that the design of the grant program is flawed relative to program goals or agency priorities;
- 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;
- 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
- 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.
- 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 the pass-through entity a written notification of the reasons for such termination, the effective date, and, in the case of partial termination, the



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portion to be terminated. However, if FEMA or the 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 the 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 the pass-through entity and the 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.



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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 FY25 awards under this program.

Instructions to Grant Recipients Pursuing Payments

FEMA reviews all grant payments and obligations to ensure allowability in accordance with <u>2 C.F.R. ?§ 200.305</u>. ?These measures ensure funds are disbursed appropriately while continuing to support and prioritize communities who rely on FEMA for assistance. Once a recipient submits a payment request, FEMA will review the request. If FEMA approves a payment, recipients will be notified by FEMA GO and the payment will be delivery pursuant to the recipients SAM.gov financial information. If FEMA disapproves a payment, FEMA will inform the recipient.

Processing and Payment Timeline

FEMA must comply with regulations governing payments to grant recipients. See 2 C.F.R. § 200.305. For grant recipients other than States, 2 C.F.R. § 200.305(b)(3) stipulates that FEMA is to make payments on a reimbursement basis within 30 days after receipt of the payment request, unless FEMA reasonably believes the request to be improper. For state recipients, 2 C.F.R. § 200.305(a) instructs that federal grant payments are governed by Treasury-State



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Cash Management Improvement Act (CMIA) agreements ("Treasury-State agreement") and default procedures codified at <u>31 C.F.R. part 205</u> and <u>Treasury Financial Manual (TFM) 4A-2000, "Overall Disbursing Rules for All Federal Agencies." See 2 C.F.R. § 200.305(a).</u>

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)



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- 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 <u>2 C.F.R. Part 200</u> and in compliance with the grant's NOFO, award terms, and applicable federal regulations.

O. Immigration Conditions

1. Materiality of Pending Immigration Condition

An immigration term and condition, including those in the DHS Standard Terms and Conditions, may be material to the Department of Homeland Security's decision to make this grant award, and the Department of Homeland Security may take any

remedy for noncompliance, including termination, if the state or territorial recipient or any local government subrecipient fails to comply with this term and condition. No final agency decision has been made as of the date of this publication.

Other Information

A. Period of Performance Extension

Extensions to the period of performance are allowed.



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Recipients should consult with their FEMA point of contact for requirements related to a performance period extension. See the <u>Preparedness Grants Manual</u> for more information on period of performance extensions.

B. Other Information

a. Environmental Planning and Historic Preservation (EHP) Compliance

See the Preparedness Grants Manual for information on EHP compliance.

b. Procurement Integrity

See the <u>Preparedness Grants Manual</u> for information on procurement integrity.

c. Financial Assistance Programs for Infrastructure

1. Build America, Buy America Act

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



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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 passthrough 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.



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d. Mandatory Disclosures

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

e. Adaptive Support

Pursuant to <u>Section 504 of the Rehabilitation Act of 1973</u>, recipients of FEMA financial assistance must ensure that their programs and activities do not discriminate against qualified individuals with disabilities.

f. Record Retention

See the Preparedness Grants Manual for information on record retention.

g. Actions to Address Noncompliance

See the <u>Preparedness Grants Manual</u> for information on actions to address noncompliance.

h. Audits

See the Preparedness Grants Manual for information on audits.

Appendix A: Allowable Costs

A. Planning

Planning costs are allowed under this program only as described in this NOFO and the Preparedness Grants Manual.

Planning spans all five mission areas of the Goal and provides a methodical way to engage the whole community in the development of a strategic, operational, and/or community-based approach to preparedness. EMPG Program funds may



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be used to develop or enhance emergency management planning activities. Some examples are included below.

a. Emergency Operations Plan

- Maintaining a current EOP that is aligned with guidelines set out in <u>Comprehensive Preparedness Guide (CPG) 101: Developing and Maintaining Emergency Operations Plans;</u>
- Modifying existing incident management and emergency operations plans; and
- Developing/enhancing large-scale and catastrophic event incident plans.

b. Public Alert and Warning System Plans

Development of plans for deploying, training, exercising, and testing of public alert and warning systems.

c. Communications Plans

- Developing and updating Statewide Communication Interoperability Plans; and
- Developing and updating Tactical Interoperability Communications Plans.

d. Administrative Plans

Developing/enhancing financial and administrative procedures for use before, during, and after disaster events in support of a comprehensive emergency management program.

e. Whole Community Engagement/Planning

- Developing or enhancing mutual aid agreements/compacts, including required membership in EMAC;
- Developing/enhancing emergency operations plans to integrate citizen/volunteer and other Non-Governmental Organization (NGO) resources and participation; and
- Integrating program design and delivery practices that ensure representation and services for disaster vulnerable, at-risk populations that may be more



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impacted by disasters, including children, seniors, individuals with disabilities or other access and functional needs, non-English speaking individuals, individuals with lower economic capacity, and other at-risk populations.

f. Resource Management Planning

- Developing/enhancing logistics and resource management plans; and
- Developing/enhancing volunteer and/or donations management plans.

g. Shelter and Evacuation Planning

Developing/enhancing sheltering and evacuation plans, including plans for alerts/warning, crisis communications, pre-positioning of equipment for areas potentially impacted by mass evacuations, and re-entry.

h. Recovery Planning

- Disaster housing planning, such as creating/supporting a state disaster housing task force and developing/enhancing state disaster housing plans;
- Pre-event response, recovery, and mitigation plans in coordination with state, local, and tribal governments;
- Developing/enhancing other response and recovery plans; and
- Developing recovery plans and preparedness programs consistent with the principles and guidance in the National Disaster Recovery Framework (NDRF) that will provide the foundation for recovery programs and whole community partnerships. Preparedness and pre-disaster planning were given special attention within the NDRF with specific guidance: Planning for a Successful Disaster Recovery (pages 63-70). For more information on the NDRF see National Disaster Recovery Framework.

i. Continuity Planning

Continuity planning and operations are an inherent element of each core capability. Continuity operations increase resilience and the probability that organizations can perform essential functions. FEMA develops and promulgates Federal Continuity Directives (FCDs) to establish continuity program and planning requirements for executive departments and agencies and Continuity Guidance



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Circulars (CGCs) for SLTT governments, non-governmental organizations, and private sector critical infrastructure owners and operators. This direction and guidance assist in developing capabilities for continuing the essential functions of federal, state, local, tribal, territorial governmental entities as well as the public/private critical infrastructure owners, operators, and regulators enabling them.

Presidential Policy 40, FCD 1, FCD 2, and the CGC outline the overarching continuity requirements and guidance for organizations and provide guidance, methodology, and checklists. For additional information on continuity programs, guidance, directives, and available technical assistance, refer to the Continuity Resource Toolkit.

Allowable continuity planning activities include the development of the following:

- 1. Continuity of Operations and Continuity of Government planning products for the continuance of essential functions and associated leadership;
- 2. Continuity Assessment Tool-Based evaluations of continuity programs capability;
- Risk-based needs assessments based on the THIRA to inform risk mitigation efforts to ensure the continuity of essential functions and associated leadership; and
- 4. Public and private sector outreach and messaging regarding continuity resilience benefits and strategies.

B. Organization

Organization costs are allowed under this program only as described in this NOFO and the <u>Preparedness Grants Manual</u>.

Per the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 93-288 (1974) (codified as amended at 42 U.S.C. §§ 5121-5207), EMPG Program funds may be used for all-hazards emergency management operations, staffing, and other day-to-day activities in support of emergency management, including hazard mitigation staffing of the State Hazard Mitigation Officer position; staffing CERT and Citizen Corps positions at the state and local levels to promote whole community engagement in all phases of emergency management; performing closeout activities on FEMA disaster assistance grants; staffing



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permanent technical advisors on children's needs at the state, local, tribal, and territorial levels; staffing Continuity Coordinators and Managers to lead and coordinate development and integration of continuity readiness across all governmental levels and the private sector; and supporting fusion center analysts who are directly involved in all-hazards preparedness activities as defined by the Stafford Act. Proposed staffing activities should be linked to accomplishing the activities outlined in the EMPG Program Work Plan. Recipients are encouraged to fund at least one dedicated Planner, Training Officer, and Exercise Officer. Personnel costs, including salary, overtime, compensatory time off, and associated fringe benefits, are allowable EMPG Program costs and must comply with 2 C.F.R. Part 200, Subpart E – Cost Principles.

a. Federal (and Mutual Aid) Emergency Response Official (F/ERO) Credentialing and Validation

The following costs related to F/ERO credentialing and validation are allowable under the EMPG Program:

- Working group meetings and conferences relating to emergency responder credentialing and validation;
- Compiling data to enter into an emergency responder repository;
- Coordinating with other state, local, territorial, and tribal partners to ensure interoperability among existing and planned credentialing and validation systems and equipment; and
- Planning to incorporate emergency responder identity and credential validation into training and exercises.

b. Organizational Clothing Costs for Emergency Management Personnel

There may be a need for emergency management personnel to wear clothing that clearly identifies their agency, organizational function, and responsibilities when carrying out their official emergency-related duties. EMPG funding may be used to purchase organizational clothing for full-time emergency management personnel who may be deployed for emergency operations, including when:

1. The Emergency Operations Center (EOC) is activated;



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- 2. Emergency management personnel are deployed in the field to conduct damage assessments and response and recovery operations;
- 3. Assisting in and delivering official emergency management training and exercises, and;
- 4. Providing public information briefs and interviews on behalf of their emergency management agency.

The state or territory emergency management agency should maintain an inventory of such clothing and uniforms to allow for issuance to other personnel who may be deployed for emergency operations.

In addition:

- EMPG funding **may not** be used to purchase clothing that would be used for everyday wear by emergency management employees or other personnel; and
- Clothing, uniforms, undergarments, jackets, vests, etc. are also allowable for CERT members as listed on the Authorized Equipment List (AEL): <u>21GN-00-</u> CCEQ | FEMA.gov.

For a complete list of other eligible clothing and protective gear allowable for purchase with EMPG funding, applicants, recipients and FEMA staff are encouraged to refer to the AEL website for the most up to-date information: Authorized Equipment List | FEMA.gov.

C. Equipment

Equipment costs are allowed under this program only as described in this NOFO and the Preparedness Grants Manual.

Allowable equipment categories for the EMPG Program are listed in the <u>AEL</u>. Unless otherwise stated, equipment must meet all mandatory regulatory and/or FEMA-adopted standards to be eligible for purchase using these funds. In addition, agencies will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment. Allowable equipment includes equipment from the following AEL categories:

- Personal Protective Equipment (Category 1);
- Information Technology (Category 4);
- Cybersecurity Enhancement Equipment (Category 5);



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- Interoperable Communications Equipment (Category 6);
- Detection Equipment (Category 7);
- Power Equipment (Category 10);
- Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE) Reference Materials (Category 11);
- CBRNE Incident Response Vehicles (Category 12);
- Physical Security Enhancement Equipment (Category 14);
- CBRNE Logistical Support Equipment (Category 19); and
- Other Authorized Equipment (Category 21).

In addition to the above, general-purpose vehicles may be procured in order to carry out the responsibilities of the EMPG Program.

If recipients have questions concerning the eligibility of equipment not specifically addressed in the AEL, they should contact their Regional EMPG Program Manager for clarification. Applicants should analyze the cost benefits of purchasing versus leasing equipment, especially high-cost items and those subject to rapid technical advances. Large equipment purchases must be identified and explained. For more information regarding property management standards for equipment, please reference 2 C.F.R. Part 200, including 2 C.F.R. §§ 200.310, 200.313, and 200.316. Also see 2 C.F.R. §§ 200.216, 200.471, and FEMA Policy #405- 143-1, Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services, or successor policy, regarding prohibitions on covered telecommunications equipment or services.

Recipients using EMPG Program funds to support emergency communications equipment activities must comply with the <u>SAFECOM Guidance on Emergency Communications Grants</u>, including provisions on technical standards that ensure and enhance interoperable communications. See the <u>Preparedness Grants Manual</u> for more information.

In general, with exception of critical emergency supplies and the associated inventory management plan, equipment included in the AEL may be purchased without separate approval from FEMA. However, as with all grant-funded activities, the equipment purchase must be well justified and reasonable. Furthermore, the purchase must be supported by the approved Work Plan. If the equipment is not clearly supported by the approved Work Plan, the recipient must seek advance approval from the applicable FEMA Regional Grant Program Office



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prior to purchasing the equipment, and an updated Work Plan may be required.

FEMA will consider requests to purchase equipment that is not listed in the AEL on a case-by-case basis. Such requests should be submitted in writing to the applicable <u>FEMA Regional Grant Program Office</u>. FEMA's review and approval of such requests will involve both the FEMA regional office and headquarters program staff to ensure nationwide consistency in the decision-making process and to support any necessary updates to the AEL.

Costs associated with the development and maintenance of fixed and mobile contingency communications and information systems as well as investments in hardening and other resilience strategies to ensure the continuance of essential government functions and services are allowed.

Small Unmanned Aircraft Systems (sUAS) and critical emergency supply costs are also allowable under this program. See the <u>Preparedness Grants</u> <u>Manual</u> for more information. Additional information and requirements applicable to sUAS purchases can be found in the AEL at 03OE-07-SUAS.

D. Training and Exercises

Training and exercise costs are allowed under this program only as described in this NOFO and the Preparedness Grants Manual.

EMPG Program funds may be used for a range of emergency management-related training activities to enhance the capabilities of state and local emergency management personnel through the establishment, support, conduct, and attendance of training. Training activities should align to a current, multi-year Integrated Preparedness Plan (IPP) developed through an annual Integrated Preparedness Planning Workshop (IPPW) and build from training gaps identified in the THIRA/SPR process. Further guidance concerning the IPP and the IPPW can be found at Preparedness Toolkit Program Management Templates. Training should:

- Foster the development of a community-oriented approach to emergency management that emphasizes engagement at the community level;
- Strengthen best practices; and
- Provide a path toward building sustainable resilience.



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Allowable training-related costs include the following:

- 1. Funds Used to Develop, Deliver, and Evaluate Training: Includes costs related to administering training, such as planning, scheduling, facilities, materials and supplies, reproduction of materials, and equipment. Training should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Any training or training gaps, including those for children and individuals with disabilities or other access and functional needs, should be identified in the multi-year IPP and addressed in the training cycle. States are encouraged to use existing training rather than developing new courses. When developing new courses, states are encouraged to apply the Analysis, Design, Development, Implementation, and Evaluation (ADDIE) model for instructional design. More information is available at NTED | Training Resource Development Center;
- 2. Overtime and Backfill: Overtime costs, including payments related to backfilling personnel, that are the direct result of attendance at FEMA and/or approved training courses and programs are allowable. These costs are allowed only to the extent the payment for such services is in accordance with the policies of the state or unit(s) of local government and has the approval of the state or FEMA, whichever is applicable. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government and from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities;
- 3. **Travel**: Travel costs (e.g., airfare, mileage, per diem, and hotel) are allowable as expenses by employees who are on travel status for official business related to approved training. International travel is not an allowable cost under this program unless approved in advance by FEMA;
- 4. Hiring of Full- or Part-Time Staff or Contractors/Consultants: Full- or part-time staff or contractors/consultants may be hired to support direct training-related activities. Hiring of contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327. Payment of salaries and fringe benefits must be in accordance with the policies of the state or unit(s) of local government and have the approval of the state or FEMA, whichever is applicable; and



5. Certification/Recertification of Instructors: Costs associated with the certification and recertification of instructors are allowed. States are encouraged to follow the FEMA Instructor Quality Assurance Program to ensure a minimum level of competency and corresponding levels of evaluation of student learning. This is particularly important for those courses that involve training of trainers.

Additional types of allowable training or training-related activities include, but are not limited to:

- Developing/enhancing systems to monitor training programs;
- Public Alert and Warning System training;
- Conducting all-hazards emergency management training;
- Attending EMI training or delivering EMI train-the-trainer courses;
- Attending other FEMA-approved emergency management training;
- State-approved, locally sponsored CERT training;
- Participating in FEMA Continuity Excellence Service Certificate Program activities; and
- Mass evacuation training at local, state, territorial and tribal level.

Allowable exercise-related costs include:

- 1. Funds Used to Design, Develop, Conduct and Evaluate Preparedness Exercises: This includes costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, travel, and documentation. Recipients are encouraged to use free public space/locations/facilities whenever available prior to the rental of space/locations/facilities. Exercises should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Gaps identified during an exercise, including those for children and individuals with disabilities or other access and functional needs, should be included in the AAR/IP and addressed in the exercise cycle;
- 2. Hiring of Full- or Part-Time Staff or Contractors/Consultants: Full- or part-time staff may be hired to support direct exercise activities. Payment of salaries and fringe benefits must be in accordance with the policies of the state or unit(s) of local government and have the approval of the state or FEMA, whichever is applicable. The services of contractors/consultants may also be procured to support the design, development, conduct, and



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- evaluation of exercises. Hiring of contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327;
- 3. Overtime and Backfill: The entire amount of overtime costs, including payments related to backfilling personnel, that are the direct result of time spent on the design, development and conduct of exercises are allowable expenses. These costs are allowed only to the extent the payment for such services is in accordance with the policies of the state or unit(s) of local government and has the approval of the state or FEMA, whichever is applicable. Dual compensation is never allowable, meaning, in other words, that an employee of a unit of government may not receive compensation from their unit or agency of government and from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though their work may benefit both entities:
- 4. **Travel**: Travel costs (e.g., airfare, mileage, per diem, hotel) are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of the exercise activities;
- 5. **Supplies**: Supplies are items that are expended or consumed while planning and conducting the exercise activities (e.g., gloves, non-sterile masks, and disposable protective equipment);
- 6. **HSEEP Implementation**: This refers to costs related to developing and maintaining an exercise program consistent with HSEEP; and
- 7. Other Items: These costs are limited to items consumed in direct support of exercise activities, such as space/locations rentals for planning and conducting an exercise, equipment rentals (e.g., portable toilets, tents), food/refreshments, and the procurement of other essential nondurable goods.

Costs associated with the provision of reasonable accommodations and modifications that facilitate full access for children and adults with disabilities are allowable.

Unauthorized exercise-related costs include:

 Reimbursement for maintenance and/or wear and tear costs of general use vehicles (e.g., construction vehicles) and emergency response apparatus (e.g., fire trucks, ambulances). The only vehicle costs that are reimbursable are fuel/gasoline or mileage;



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- Equipment that is purchased for permanent installation and/or use beyond the scope of exercise conduct (e.g., electronic messaging signs); and
- Durable and nondurable goods purchased for installation and/or use beyond the scope of exercise conduct.

E. Travel

Domestic travel costs are allowed under this program, as provided for in this NOFO and the <u>Preparedness Grants Manual</u>. International travel is not an allowable cost under this program unless approved in advance by FEMA.

F. Construction and Renovation

Construction and renovation costs are allowed under this program only as described in this NOFO and the <u>Preparedness Grants Manual</u>. All proposed construction and renovation activities must undergo an Environmental Planning and Historic Preservation (EHP) review, including approval of the review from FEMA, before undertaking any action related to the project. Failure of a grant recipient to meet these requirements may jeopardize Federal funding.

Construction and renovation projects for a state, local, tribal, or territorial government's principal Emergency Operations Center (EOC), as defined by the SAA, as well as costs associated with the development and maintenance of capabilities such as alternate sites and associated fixed and mobile communications and information systems as well as investments in hardening and other resilience strategies to ensure the continuance of essential government functions and services are allowable under the EMPG Program. FEMA must provide written approval prior to the use of any EMPG Program funds for construction or renovation. Requests for EMPG Program funds for construction of an EOC must be accompanied by an EOC Investment Justification (located in the Related Documents tab of the EMPG Program Grants.gov posting) to their Regional EMPG Program Manager for review. Additionally, recipients are required to submit a SF-424C Form, SF-424D Form, and Budget detail citing the project costs.

The above examples are not intended to exclude other construction projects as potentially allowable costs. For example, construction of a facility for the storage and distribution of critical emergency supplies and/or to serve as a staging area



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for deployment of emergency response resources is potentially an allowable expense. Other construction or renovation projects, such as a secondary or local EOC, will be considered on a case-by-case basis, as described below in the guidance regarding advance written approval.

a. Advance Approval Requirement

Recipients must receive advance written approval from FEMA prior to the use of any annual EMPG Program funds for construction or renovation, including such activities at the subrecipient level. Such costs would need to fall within the scope of the recipient's final approved Work Plan, otherwise an updated Work Plan may be required. Such requests should be submitted in writing to the applicable FEMA Regional Grant Program Office. FEMA's review and approval will involve both the regional office and the FEMA Grant Programs Directorate.

b. Real Property Use and Disposition Requirements

Real property improved under a federal award falls under the 2 C.F.R. Part 200 guidance for real property. In accordance with 2 C.F.R. § 200.311, a recipient or subrecipient may only use real property acquired or improved under a federal award for the originally authorized purpose, as long as it is needed for that purpose, during which time the recipient or subrecipient must not dispose of or encumber its title or other interests. However, upon the end of that period where it needs the property for the originally authorized purpose (i.e., the functional use of the property for which FEMA awarded the grant), the recipient or subrecipient will then dispose of the property in keeping with the requirements set forth in 2 C.F.R. § 200.311. When a grant-funded property is no longer needed for the originally authorized purpose, the recipient or subrecipient (through the pass-through entity) must obtain disposition instructions from the cognizant FEMA Regional Administrator or the pass-through entity. For additional information on this, see Information Bulletin 458a, Clarifying Guidance for the Annual Emergency Management Performance Grant (EMPG) and the FY 2020 COVID-19 EMPG Supplemental (EMPG-S) Programs.

c. Construction of Communication Towers



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When applying for funds to construct communication towers, recipients and subrecipients must submit evidence that the Federal Communication Commission's Section 106 review process has been completed and submit all documentation resulting from that review to FEMA prior to submitting materials for EHP review. Recipients and subrecipients are also encouraged to have completed as many steps as possible for a successful EHP review in support of their proposal for funding (e.g., coordination with their State Historic Preservation Office to identify potential historic preservation issues and to discuss the potential for project effects, compliance with all state and EHP laws and requirements). Projects for which the recipient believes an Environmental Assessment may be needed, as defined in Implementation of the National Environmental Policy Act, and EHP Directive and Instructions: FEMA Directive 108-1 and FEMA Instruction 108-1-1, must also be identified to the Regional EMPG Program Manager within six months of the award, and completed EHP review materials must be submitted no later than 12 months before the end of the period of performance. EHP review packets should be sent to gpdehpinfo@fema.gov.

d. Davis-Bacon Act Compliance

EMPG Program recipients using funds for construction projects must comply with the Davis-Bacon Act and subsequent legislation (codified as amended at 40 U.S.C. §§ 3141-3144, 3146-3148). Grant recipients must ensure that their contractors or subcontractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the state in which the work is to be performed. Additional information regarding compliance with the Davis-Bacon Act, including Department of Labor wage determinations, is available at Davis-Bacon and Related Acts.

e. Accessibility Compliance

EMPG Program recipients using funds to build or alter buildings must comply with accessibility requirements under the Rehabilitation Act of 1973 and Architectural Barriers Act of 1968 (ABA), as well as the Americans with Disabilities Act (ADA), if applicable, to ensure individuals with disabilities have access to such buildings. Accessibility standards under the ABA and ADA are highly similar. Additional information regarding compliance with the ABA is available at Guide to the ABA.



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G. Acquisition of Real Property

Acquisition of real property is permissible if such property is needed to support other allowable program costs or activities. For additional information on this, see Information Bulletin 458a, Clarifying Guidance for the Annual Emergency Management Performance Grant (EMPG) and the FY 2020 COVID-19 EMPG Supplemental (EMPG-S) Programs.

a. Advance Approval Requirement

Consistent with the requirements outlined above regarding construction activities, recipients and subrecipients (through the pass-through entity) must obtain advance written approval from the cognizant FEMA Regional Administrator prior to obligating annual EMPG Program funds for acquisition of real property. Additionally, in cases of acquisition or improving real property, recipients are required to submit a SF-429-B, Real Property Status Report, Attachment B providing details of the relevant property to be acquired.

b. Property Use, Reporting, and Disposition Requirements

The acquisition, use, and disposition of real property shall be subject to the provisions of 2 C.F.R. Part 200. In accordance with 2 C.F.R. Part 200, recipients and subrecipients are required to report on the status of the acquired property on an annual basis using <u>SF-429-A</u>, Real Property Status Report, Attachment A (General Reporting). Such reporting shall continue as long as the property is being used for the originally authorized purpose.

The same use and disposition guidance as outlined in Sections 11.F.b above applies to real property acquired with annual EMPG Program funds. For additional information on this, see <u>Information Bulletin 458a</u>, <u>Clarifying Guidance for the Annual Emergency Management Performance Grant (EMPG) and the FY 2020 COVID-19 EMPG Supplemental (EMPG-S) Programs</u>.

H. Leasing of Real Property

Leasing of real property is permissible if the property is needed to support other allowable annual EMPG Program activities.



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a. Advance Approval Requirement

Recipients and subrecipients (through the pass-through entity) must obtain advance written approval from the cognizant FEMA Regional Administrator prior to obligating annual EMPG Program funds for the leasing of real property.

b. Allowable Period of Lease Expenses

In cases where a property will be leased and the lease will be paid in full or in part using annual EMPG Program, any costs associated with the lease that are charged to an annual EMPG Program award must occur within the period of performance of the associated award(s). Real property lease costs must also comply with 2 C.F.R. Part 200

I. Operational Overtime

Operational overtime costs are allowed under this program only as described in this NOFO and the Preparedness Grants Manual.

J. Whole Community Preparedness

EMPG Program recipients should engage with the whole community to advance community and individual preparedness and to work as a nation to build and sustain resilience. Recipients should integrate program design and delivery practices that ensure representation and services for disaster vulnerable populations that may be more impacted by disasters including children, seniors, individuals with disabilities or other access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity, and other disaster vulnerable populations.

Individual preparedness should be coordinated by an integrated body of government and nongovernmental representatives as well, including but not limited to, elected officials, the private sector (especially privately owned critical infrastructure), private nonprofits, nongovernmental organizations (including faith-based, community-based, and voluntary organizations), advocacy groups for disaster vulnerable populations that may be more impacted by disasters including children, seniors, individuals with disabilities or other access and functional needs, individuals with diverse culture and language use, individuals with lower economic



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capacity, and other disaster vulnerable populations. By engaging these stakeholders, EMPG Program recipients can help FEMA develop and promote a suite of well-targeted solutions for individuals and communities to adopt. Recipients should coordinate preparedness initiatives with FEMA and whole community partners to efficiently apply federal funding to reach the goal of individual and community resilience.

The following preparedness programs are allowable expenses and resources:

- Community Emergency Response Team (CERT) programs, which educate volunteers about disaster preparedness for the hazards that may impact their area and train them in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations. CERT offers a consistent, nationwide approach to volunteer training and organization that professional responders can rely on during disaster situations, allowing them to focus on more complex tasks.
- Financial Preparedness Activities that encourage and assist Americans in preparing for the true cost of disasters. Allowable activities include encouraging emergency savings, promoting home and renter's insurance, and promoting flood insurance for individuals and families. Partnerships with local financial wellness organizations such as credit unions, financial counselors, community banks, and others that reach a variety of audiences are encouraged.
- Preparedness of Community-Based Organizations that serve as a critical safety net for Americans disproportionately impacted by disasters. Examples of community-based organizations include but are not limited to food banks, food pantries, homeless shelters, school readiness and after school centers, adult day care centers, job training centers, legal assistance centers, and cultural centers. Allowable activities include Whole Community exercises, trainings, and activities focused on staff preparedness, information sharing with clients and government, and continuity of essential functions in the event of an emergency.
- Youth Preparedness Resources are available on Ready Kids. Bolstering youth preparedness across the nation is a priority for FEMA as the Agency works with state, local, tribal, and territorial partners to create a culture of preparedness in the United States. Information on youth-centric educational curricula, games, planning materials, and other relevant resources can be found at Ready Kids. Furthermore, FEMA's Individual and Community Preparedness Division and regional-based Community Preparedness Officers are available to provide grant recipients with guidance and assistance. Please email FEMA-



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Prepare@fema.dhs.gov to contact one of the Agency's subject matter experts.

The following are examples of youth preparedness activities that recipients are encouraged to undertake as allowable costs:

- 1. Outreach to a local school board or elementary school to encourage the adoption of the Student Tools for Emergency Planning (STEP) curriculum. STEP is a classroom-based emergency preparedness curriculum for 4th and 5th -graders in an easy, ready-to-teach format. Students will learn about disasters, emergencies, and hazards, and how to create a disaster supply kit and family emergency communication plan. An overview of the STEP program along with the instructor guide and student activity book is available at Ready STEP.
- 2. Sponsor the creation of a Teen for Community Emergency Response Team (CERT) in your jurisdiction. The CERT Program is a national program of volunteers trained in disaster preparedness and emergency response. Volunteers come from all ages and all walks of life, including teenagers. Additional information, including a step-by-step guide on how to start a Teen CERT, is available at Ready Teen CERT.

The following tools are available to order from FEMA's warehouse free of charge:

- 1. "Prepare with Pedro" is a joint product of FEMA and the American Red Cross. The "Prepare with Pedro: Disaster Preparedness Activity Book" is designed to teach young children and their families about how to stay safe during disasters and emergencies. The book follows Pedro around the United States and offers safety advice through crosswords, coloring pages, matching games, and more. Additional information, including an ordering form, is available at Ready Prepare with Pedro.
- 2. The Ready 2 Help card game is a fun way for kids to learn how to respond to emergencies by working with friends and using skills that will help in a real emergency. Ready 2 Help teaches five simple steps to stay safe and make a difference until help arrives:
 - Stay Safe
 - Stay Calm
 - Get Help
 - Give Info
 - Give Care



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 Ready 2 Help is designed for children ages 8 and up. Additional information, including an ordering form, is available at Ready 2 Help.

K. Maintenance and Sustainment

Maintenance and sustainment costs are allowed under this program only as described in this NOFO and the Preparedness Grants Manual.

L. Amendments for EMPG Program Costs

In 2 C.F.R. § 200.308(i) it states that the Federal awarding agency may, at its option, restrict transfer of funds among direct cost categories where the Federal share exceeds the simplified acquisition threshold, and the cumulative amount of the transfer exceeds 10% of the total budget last approved by the awarding agency. For purposes of 2 C.F.R. § 200.308(i), the term "budget" includes both the federal and non-federal cost share. For EMPG Program awards (which include a 50% cost share), if the recipient wants to revise their budget and there are transfers between the direct cost categories exceeding the Simplified Acquisition Threshold and the cumulative amount of the transfers exceeds 10% of the total project costs (federal and non-federal), then EMPG recipients must request prior written approval from their Regional EMPG Program Manager for those transfers and amendments. Recipients should consult with their Regional EMPG Program Manager prior to making any changes to their EMPG Program Work Plan. For more information on EMPG Program Work Plans, please see the appendix in Section 12 of this NOFO.

Appendix B: EMPG Program Work Plan

A. EMPG Program Work Plan

Submission of an EMPG Program Work Plan is mandatory. The Work Plan outlines the state's emergency management sustainment and enhancement efforts, including new and ongoing activities and projects, that are driven by identified preparedness priorities and proposed for the EMPG Program period of performance. An FY 2025 EMPG Program Work Plan Template (available on the Grants.gov EMPG Program application page and on the EMPG Program page on FEMA.gov) is provided to facilitate the work plan development process. The



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submitted Work Plan must address all the data and information requirements included in the FY 2025 EMPG Program Work Plan Template and in the supplemental guidance included in this section. Therefore, EMPG Program applicants are strongly encouraged to use the provided FY 2025 EMPG Program Work Plan Template.

Prior to submission of the EMPG Program Work Plan, the applicant must work with the Regional Administrator or designated Regional EMPG Program Manager to identify three-to-five priority areas which will serve as the focus for EMPG Program-funded investments. The priorities must be mutually agreed to by the applicant and Regional Administrator and should be driven by the THIRA/SPR process – specifically, the outputs from the THIRA/SPR process – and other relevant information sources such as AARs, audit and monitoring findings, Hazard Mitigation Plans and other deliberate planning products. Priorities should also reflect those included in each recipient's IPP so that recipients are focusing all investments, projects, and other resources on a common set of priorities. As they select priorities, applicants should consider which capability gaps would be most operationally consequential, must be closed most urgently, and could be meaningfully addressed within the period of performance. Applicants should refer to Section 3.B. above for further guidance on the priority identification process.

Applicants must set at least one performance goal for each RA agreed-upon priority area that achieves a specific outcome. Each goal must be specific, measurable, and achievable within the period of performance, relevant to the priority area, and have a target date for completion. Applicants must describe how achieving each goal or objective will impact the priority area it supports by the end of the period of performance. Each goal must include an estimate quantifying the extent to which the supporting investments will close capability gaps (e.g., "Increase the percentage of people who can find and secure long-term housing by 10% within 1 year of an incident"). The FY 2025 EMPG Program Work Plan Template includes instructions and examples to help guide this process so that recipients can develop goals that focus on achieving specific outcomes.

The Regional Administrator or designated Regional EMPG Program Manager will ensure that the mutually agreed priorities are fully addressed in the EMPG Program Work Plan. In addition, the Regional Administrator must approve final Work Plans before states may draw down EMPG Program funds. Grant funds will be released upon approval of the state's final Work Plan.



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Following Work Plan approval, regional EMPG Program Managers will work closely with recipients to monitor progress toward goals and activities in the Work Plans during the performance period and may request further documentation from the recipients to clarify the projected Work Plan. Further, in accordance with 2 C.F.R. § 200.308 – Revision of budget and program plans, any changes to the approved Work Plan – including changes in project scope and budget changes within any direct cost category exceeding 10% of the total award amount – will require advance approval from the Regional Administrator or designated Regional EMPG Program Manager.

a. Instructions

The FY 2025 EMPG Program Work Plan Template reflects the collection of objective information and quantitative data that will allow FEMA to measure program effectiveness and investment impacts more effectively. This also enables compliance with 2 C.F.R. § 200.301, which requires federal awarding agencies to measure recipient performance to show achievement of program goals and objectives, share lessons learned, improve program outcomes, and foster adoption of promising practices. To this end, the FY 2025 EMPG Program guidance in the NOFO and Work Plan requires recipients to link EMPG Program-funded investments to THIRA/SPR results and other relevant materials that inform capability priorities and needs and to include specific performance measures that will allow FEMA to measure the impact of those investments based on the core capabilities that are addressed.

The FY 2025 EMPG Program Work Plan Template largely complements the THIRA/SPR process outlined in the Comprehensive Preparedness Guide (CPG) 201, Third Edition (CPG 201, v3). As noted in CPG 201, v3, a coordinated approach to track investments, and understand the return on investments, can help improve the effectiveness of those investments. Tracking how EMPG Program-funded investments result in specific, quantitative changes in capabilities can help guide communities' strategic planning considerations and inform resource allocation decisions that will maximize effectiveness in building or sustaining capabilities. Therefore, applicants are encouraged to refer to CPG 201, v3, along with their most recent THIRA and SPR, when developing their EMPG Program Work Plan.



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The FY 2025 EMPG Program Work Plan Template consists of the following tabs: Definitions and Guidance, Quick Links, Grant Investment Strategy, Grant Activities Outline, Detailed Budget – Excluding M&A, Budget Narrative – Excluding M&A, Detailed Budget – M&A Only, Budget Narrative – M&A Only, EMPG Program Summary, Implementation Schedule, Training Data Table, and Exercise Data Table. As explained above, the focus of the FY 2025 EMPG Program Work Plan Template is on improving data collection to better enable measurement of grant outcomes. Therefore, the narrative content is minimized and many of the cells include dropdowns for selecting applicable data. This approach also helps to simplify the Work Plan development process.

Instructions for each Work Plan section are provided below. Additional guidance and instructions are provided in the FY 2025 EMPG Program Work Plan Template on <u>Grants.gov</u>.

b. Definitions and Guidance

The Definitions and Guidance tab collects applicant information and provides instructions for completing each subsequent tab.

c. Quick Links

The Quick Links Tab uses the link functionality in Excel to allow users to navigate throughout the template quickly and minimize the need to scroll through projects and implementation schedules.

d. Grant Investment Strategy

The intent of the Grant Investment Strategy tab of the FY 2025 EMPG Program Work Plan Template is to provide an overview of the state/territory's preparedness investment strategy. It should serve as the foundation for completing the remainder of the Work Plan. It includes separate sections to explain the following:

- The performance goals associated with each priority area;
- The most recent THIRA/SPR results;
- Significant risks and capability gaps that currently exist;
- Resulting preparedness priorities; and



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The anticipated impact of the proposed EMPG Program-funded investments.

For the Performance Goals section, the applicant should identify the three-to-five priorities that were mutually agreed to and approved between the Regional Administrator and the state/territory. These goals serve as the focus for the EMPG Program-funded investments. The reference materials used to identify the priorities should be cited and their relevance explained in this section. At least one performance goal should be identified for each priority area. Each goal must be specific, measurable, achievable within the period of performance, relevant to the priority area, and have a target date for completion (i.e., SMART goal). It should describe how achieving each goal will impact the priority area it supports by the end of the period of performance.

e. Grant Activities Outline

The Grant Activities Outline (GAO) is used to capture the proposed EMPG Program-funded projects and link them to the identified priorities, performance goals, and gaps or needs. Coupled with the Implementation Schedule, the GAO supports identification and tracking of EMPG Program-funded project outcomes, which will enable better understanding of the impacts of those investments relative to the performance goals and the associated core capabilities. Identifying and tracking project outcomes also supports compliance with the Foundations for Evidence-Based Policy Making Act of 2018 and changes to 2.C.F.R related to performance, evaluation, and risk for federal grants. The GAO includes sections that allow the applicant to identify the performance goals that are supported by each project and the milestones that are critical to accomplishing each goal. Additional guidance on performance goals and milestones, including specific examples of each, are provided below.

The GAO also requires the applicant to explain the objective and anticipated impact of each project relative to the associated priorities, performance goals, and related core capabilities:

- The "Project Objective" should explain what the project will accomplish; specifically, how the project will address the identified gap or need and how it supports one or more of the identified performance goals.
- The "Anticipated Project Impact" should explain the expected project outcome relative to the associated priorities and performance goals.



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The impact statement should include a quantitative estimate of the degree to which the project will contribute to achieving the identified performance goal (see hierarchy example below).

Effective completion of the GAO requires an understanding of the established planning hierarchy. Priorities are at the top of the hierarchy, followed by performance goals that define a clear outcome or end-state and provide the basis for addressing each priority. Project proposals should be identified based on the performance goals. High priority capability gaps or needs identified through the THIRA/SPR process, particularly SPR Step 2, and other assessments are also used to inform project selection and to identify specific project objectives. Project objectives, and accompanying impact statements, should complement the performance goals by including similar outcome-focused metrics, as explained above. Lastly, identifying the specific project activities are the last step in the process of completing the GAO. Project activities are key components and/or milestones that are critical to successful completion of the project.

An example of this planning hierarchy for completing the GAO is provided below:

- Priority: Logistics and Supply Chain Management
 - **Performance Goal**: Within 24 hours of an incident, identify and mobilize lifesustaining commodities, resources, and services to 10,000 people requiring shelter and 100,000 people requiring food and water. Maintain distribution system for at least 30 days.
 - Project: Update State Logistics and Distribution Management Plan and qualify 40 additional personnel for logistics operations in NQS.
 - **Project Objective/Impact**: Increase capacity to identify and mobilize life-sustaining commodities, resources, and services to people requiring shelter, food, and water by 50%, allowing the state to do so for 7,500 people requiring shelter and 75,000 requiring food and water within 24 hours of an incident and maintain that distribution system for at least 30 days.
 - Activity: Convene cross-discipline working group meeting on May 30, 2026, to review current State Logistics and Distribution Management Plan

All EMPG Program-funded investments must be accounted for in the GAO. However, recognizing that some sustainment activities, such as funding of



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emergency manager salaries, may not align to a specific priority or performance goal, applicants are not required to identify priorities and performance goals for such investments. However, all other portions of the GAO must be completed to justify the applicable sustainment costs.

In cases where emergency management personnel are not assigned to support specific projects included in the Work Plan, the applicant may choose to create a single project (e.g., Emergency Management Personnel Project) to encompass the majority of the EMPG Program-funded salaries and fringe benefits costs. This single project would be populated on the GAO and include the associated activities, priorities, goals, anticipated outcomes, milestones, etc. for the applicable EMPG Program-funded emergency management staff, including staff supporting the M&A activities.

The various elements of the GAO tab are outlined below, along with basic instructions for completing the required entries. Supplemental guidance and instructions are included in the FY 2025 EMPG Program Work Plan Template.

- **Project Name:** Provide a descriptive name for each planned project. Examples include "Development of Emergency Function Annexes," "Development of Earthquake Scenario Loss Estimations," "Implementation of Statewide Interoperability Plan," "NIMS Training for Emergency Management Personnel," "Development of Emergency Preparedness Plan for Individuals with Disabilities," etc.
- **Brief Project Description:** Provide further details on the project, particularly where the project name does not sufficiently describe the project.
- **Gap or Need Addressed:** Briefly describe the specific gap or need addressed by the project.
- Reference for Identified Gap or Need: Select the documentation used to identify the cited gap or need from the drop-down menu.
- **Project Objective:** Explain how the project addresses the identified gap or need, and how it supports the identified priorities and performance goals.
- Anticipated Project Impact: Explain the expected project outcome relative to the associated priorities and performance goals.
- Build or Sustain: Select whether the project will build or maintain/sustain the identified core capability(ies).
- EMPG Program National Priority Area: Select the applicable National Priority Area from the drop-down menu.



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- Regional Administrator (RA) Agreed Upon Priority Area: Select from a drop-down list of the 32 core capabilities and other priorities identified in the latest version of the National Preparedness Report. If the priority is not included in the drop-down list, enter "other" for Primary, Secondary and/or Tertiary, and then enter the priority in the adjacent cell.
- **POETE Category:** Select whether the project relates to Planning, Organization, Equipment, Training, or Exercises. Multiple POETE categories can be selected to accommodate projects that span multiple categories. For example, building capability often involves a combination of planning, training, and exercise activities. Space is provided to populate the Primary, Secondary and Tertiary POETE category.
- Emergency Management Accreditation Program (EMAP) Standard Element: This field is optional. It is made available to those states/territories that are EMAP certified and want to continue tracking their investments by EMAP Standard Elements. Select the appropriate EMAP Standard Elements from the drop-down menu, if applicable.
- **Mission Area:** Select the appropriate preparedness mission area supported by the project: Prevention, Protection, Mitigation, Response, or Recovery. Multiple mission areas can be selected to accommodate projects such as plans and exercises that involve multiple mission areas, and space is provided to populate the Primary, Secondary and Tertiary Mission Areas.
- Core Capabilities: Select up to five core capabilities supported by the project. Indicate whether the Core Capability has a target with a gap rated as high priority.
- **Performance Goals:** Select the performance goal(s) from the drop-down menu. The drop-down menu will consist of the performance goals as entered in the Grant Investment Strategy.
- Current Capability Metrics: Identify capability metrics prior to the project implementation.
- **Milestones:** Identify key project activities and other deliverables or outputs that are critical to accomplishing the identified performance goal and can be tracked to demonstrate progress toward achieving the performance goal.

B. Detailed Budget - Excluding M&A

The Detailed Budget – Excluding M&A tab enables a full accounting of all project activity costs, excluding M&A costs. This tab contains an itemization of non-M&A costs related to personnel, fringe benefits, travel, equipment, supplies, contractual



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services, construction, other, and indirect costs. For personnel and fringe benefits, the position title and percentage of time or fringe allocated to the EMPG Program grant is required. Each line item is assigned to its relevant project, allowing the information in mission areas, core capabilities, priorities, EMAP, and POETE categories to populate accordingly. This enables a breakdown of the full EMPG Program budget into various categories: Mission Area, Core Capabilities, National Priority Area, RA Agreed Upon Priority, EMAP Standard Elements, and POETE Category. The cells for each of these categories are automatically populated based on the project number as identified in the Grant Activities Outline.

C. Budget Narrative - M&A Only

The purpose of the Budget Narrative – M&A Only tab is to: 1) justify the need for each line item and the cost estimates; 2) explain how costs relate to the programmatic goals of the project(s); and 3) supplement other budget information provided on the Detailed Budget– M&A Only tab. For the Cost Share, applicants must include a detailed description of the source of the cost share/matching funds. If funds or services are to be provided by a third party for in-kind match, a dated letter of commitment is required to document the donation. This tab will include a narrative for each cost category of the budget.

D. Information for the Detailed Budget and Budget Narrative

This section of the Work Plan is a detailed description of the budget found in the SF-424A and must include a detailed discussion of how EMPG Program funds will be used. Applicants must **itemize** costs related to personnel, fringe benefits, travel, equipment, supplies, contractual costs, other direct costs, indirect costs, and total costs.

Applicants should use the following instructions and budget cost category descriptions to complete the Budget Detail section of the Work Plan.

Personnel: List each position with a brief description of the duties and responsibilities (no personnel names), as well as the salary computation for staff. If a Cost-of-Living Adjustment increase and/or merit pay increase in salary will be provided for the position, include those costs in calculations for personnel and the associated fringe benefits on the applicable Detailed Budget and the Budget Narrative.



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Fringe Benefits: List the computation for fringe benefits for each of the personnel listed in the budget worksheet. Estimated rates for fringe are allowable but provide the basis for that estimation in the budget narrative (e.g., average percent fringe paid for most employees within the agency). If not using an estimate, list fringe benefit and the associated costs for each employee that will be paid by EMPG Program funding (e.g., Social Security/FICA, Unemployment Compensation, Medicare, Retirement, Health Insurance, Life Insurance, etc.). Also, in cases where fringe benefits costs are included in an indirect cost rate agreement, the fringe benefits cannot also be charged as a direct cost for reimbursement.

Travel: Specify the mileage, per diem, estimated number of trips in-state and out-of-state, number of travelers, and other costs for each type of travel for staff. Travel may be integral to the purpose of the proposed project (e.g., management, monitoring and/or oversight of grant award and/or subrecipients) or related to propose project activities (e.g., attendance at training or meetings related to management of the EMPG Program award). Travel costs identified in this section are for employees of the applicant/recipient only. For travel costs related to staff training, include as many details as possible about each proposed training cost, including the name of the training course(s), training provider, personnel who will attend the training, proposed dates (estimates are accepted), etc. Travel category costs do not include 1) costs for travel of consultants, contractors, consortia members, or other partner organizations, which are included in the "Contractual" category; or 2) travel costs for employees of subrecipient agencies (those should be included in the Contractual category, if applicable).

Equipment: List each equipment item for EMPG Program purposes only by Line-Item Name and in the same order as listed on the Detailed Budget. Include a brief description of each equipment item (no brand names); per unit cost, quantity, and total cost; location of equipment (if other than the direct recipient agency); and how the equipment will be utilized. Equipment is defined in 2 C.F.R. § 200.1.

Supplies: Include all tangible personal property other than those described in the definition of "equipment" as defined by <u>2 C.F.R. § 200.1</u>. Supplies are also defined in <u>2 C.F.R. § 200.1</u>. The budget detail should identify categories of supplies to be procured for EMPG Program purposes only (e.g., printing supplies, office supplies, etc.) and the calculation of those costs (e.g., based on monthly rates or based on an average of previous years' similar costs). Non-tangible goods and services associated with supplies, such as printing service, photocopy services, and rental



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costs should be included in the "Other" category. Provide the basis for calculation of supplies including the Line-Item Name and list supplies in the Budget Narrative in the same order as listed on the Detailed Budget. Subrecipient M&A and non-M&A costs should be included in the "Other" category.

Contractual: Identify each proposed contract related to EMPG Program purposes only and specify its purpose and estimated cost. Contractual/consultant services are those services to be carried out by an individual or organization (do not include company or individual names in budget narrative), other than the applicant, in the form of a procurement relationship. Leased or rented goods (equipment or supplies) for EMPG Program purposes should be included in the "Other" category. The applicant should list the proposed contract activities along with a brief description of the scope of EMPG Program work or services to be provided and proposed duration. Include the basis for the calculation of contractual services costs (e.g., contractor training instructor speaking fee, contractor travel costs and contractor instructional materials).

Other: This category should include only those types of direct costs that do not fit in any of the other budget categories and are related to EMPG Program purposes only. Include a description of each cost by Line-Item Name and in the same order as listed on the applicable Detailed Budget. Include the basis for calculation of the costs. Examples of costs for EMPG Program purposes that may be in this category include the following: insurance, rental/lease of equipment or supplies, equipment service or maintenance contracts, printing or photocopying rental, etc. Subrecipient M&A and non-M&A costs from their subawards (e.g., subgrants) are a distinct type of cost under this category. The term "subaward" means an award of financial assistance (money or property) by any legal agreement made by the recipient to an eligible subrecipient. This term does not include procurement purchases, technical assistance in the form of services instead of money, or other assistance in the form of revenue sharing, loans, loan guarantees, interest subsidies, insurance, or direct appropriations. Subcontracts are not subawards and belong in the contractual category. Applicants must provide the aggregate amount they propose to issue as subaward work and a description of the types of M&A and non-M&A activities to be supported.

Construction: Include construction costs, including renovation projects for a state or territorial government's principal EOC. Include a description of the types of construction or renovation services proposed and the calculation of these costs



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(no company or individual names). Subrecipient construction costs should be included in the Other category. M&A funding cannot be used for construction or renovation costs.

Indirect Costs: If indirect charges are budgeted, indicate the approved rate and base (the cost categories for which this indirect cost percentage rate will be applied.) Indirect costs are those incurred by the recipient for a common or joint purpose that benefit more than one cost objective or project and are not readily assignable to specific cost objectives or projects as a direct cost. In order for indirect costs to be allowable, the applicant must have a federal or state negotiated indirect cost rate (e.g., fixed, predetermined, final or provisional), or must have submitted a proposal to the cognizant federal or state agency. An approved Indirect Cost Rate Agreement signed by the recipient agency and the cognizant agency for the recipient, or a copy of the proposal to the cognizant federal or state agency for an indirect cost rate, must be included in the submission of the Work Plan Template for application purposes.

Examples of Indirect Cost Rate calculations are shown below:

- 1. Personnel (Indirect Rate x Personnel = Indirect Costs)
- 2. Personnel and Fringe (Indirect Rate x Personnel & Fringe = Indirect Costs)
- 3. Total Direct Costs (Indirect Rate x Total Direct Costs = Indirect Costs)

Applicants who wish to use a cost allocation plan in lieu of an indirect cost rate must also reach out to the FEMA Grants Management Specialist for further instructions. Per <u>2 C.F.R. Part 200, Appendix VII, paragraph D.1.c,</u> this established rate must be accepted by any Federal agency to which the governmental department or agency applies for funding. Applicants who wish to request the case-by-case exception should reach out to their FEMA Grants Management Specialist for further instructions.

Post-award requests to charge indirect costs will be considered on a case-by-case basis and based upon the submission of an agreement or proposal as discussed above or based upon the de minimis rate or cost allocation plan, as applicable.

E. EMPG Program Summary



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This tab includes summary information for the award as entered in the budget tabs and the Grant Activity Outline. The overall budget summary will include the total award amount, federal amount, non-federal amount (cost share), and M&A amount, along with the calculated percentage of each. The additional budget summary tables will calculate the amount allocated for federal funds, non-federal funds (cost share) and total project costs for each cost category. There is also a budget summary table with similar information for each primary mission area and core capability.

The EMPG Program Summary tab also provides users with an overview of their progress in the FY 2025 EMPG Program Performance Metrics. The metrics are automatically populated from the calculations of information provided in the GAO. These metrics aim to provide the count, percentage, and associated dollar amount affiliated with the following performance metrics: 1) Capability-building Projects for Alignment to Capability Gaps in SPR; 2) Funding Spent on Capability-building Projects Aligned to Capability Gaps in SPR; 3) Building Capabilities for High Priority Targets; 4) Regional and National Priority Area Alignment; and 5) Plans-Training-Exercise Alignment.

a. Implementation Schedule

The Implementation Schedule includes the basic elements of a project management plan. It is used to capture key project activities to include both EMPG Program-funded activities that are critical to accomplishing the project objectives as identified in the Grant Activities Outline, as well as tasks that are essential to effective project management. Thus, this product can be used as a basic project management tool to plan and track the progress of key project activities and associated tasks. Key project activities should generally correlate with the "Milestones" identified for each project included in the Grant Activities Outline.

The Implementation Schedule enables the applicant to identify key project activities by year/quarter, the associated tasks, timelines, status reports, and challenges or risks that may affect successful completion of the activity as planned. It also allows for the tracking of project progress by including estimated and actual completion dates for each activity and the ability to enter quarterly accomplishments relating to the activity. This functionality allows for quarterly



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reporting of project progress, in accordance with the programmatic requirements of the EMPG Program. Also, data from the Implementation Schedule should be completed and submitted to FEMA as a component of quarterly reporting on grant activities.

b. Training Data Table

To facilitate consistent data reporting and performance measures collection, the FY 2025 EMPG Program Work Plan Template includes a Training Data Table. This table should reflect training activities outlined in the multi-year IPP and completion of required EMPG Program training courses. The data requirements are defined in the section below. Applicants/recipients are not required to report EMPG Program-funded personnel costs associated with training. Training related to the NQS is not reported on the Training Data Table. Also, data from the Training Data Table should be completed and submitted to FEMA as a component of quarterly reporting on grant activities. Upon entering the project name or number in the template, the cells located to the right of the main Training Data Table will auto-populate the associated priority, mission area, capabilities, and functional areas based on the project data included in the Grant Activities Outline.

1. Training Data Table Template

Project Number	•	Name of Fraining	Scheduled Date	Date Training was Conducted/Completed	EMPG Program Required Training? (Y/N)	Number of Personnel Trained	
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2. Training Data Table Definitions

- Column 1 Project Number from the GAO
- Column 2 Project Name from the GAO
- Column 3 Name of training course
- Column 4 Scheduled date of training course



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- Column 5 Date training was conducted or completed
- Column 6 Is the training course required by the EMPG Program?
- Column 7 Number of personnel trained
- Column 8 NIMS Training Course Number (if applicable)
- Column 9 Is the training identified in the multi-year IPP?

c. Exercise Data Tables

To facilitate consistent data reporting and performance measure collection, an Exercise Data Table should be completed for any exercises that meet EMPG Program requirements and/or exercises conducted in whole or part with EMPG Program funds. The Exercise Data should include EMPG Program-funded exercises and costs to run the exercise (e.g., planning, materials, props, contractual services for conducting the exercise, AAR and IP, etc.). Any exercise planned or conducted during the grant period of performance should be reported on the Exercise Data Table. Applicants/recipients are not required to report EMPG Program-funded personnel costs associated with exercises. Data from the Exercise Data Table should also be completed and submitted to FEMA as a component of quarterly reporting on grant activities. The data requirements are defined in the section below. Upon entering the project name or number in the template, the cells located to the right of the main Exercise Data Table will autopopulate the associated priority, mission area, capabilities, and functional areas based on the project data included in the Grant Activities Outline.

1. Exercise Data Table Template

Project Number	Project Name	Name of Exercise	Scheduled Date	Date Exercise Conducted/Completed	Type of Exercise	Exercise Fulfills Progressive Exercise Requirement (Y/N)



2. Exercise Data Table Definitions

- Column 1 Project Number from the GAO
- Column 2 Project Name from the GAO
- Column 3 Exercise Name
- Column 4 Scheduled date of exercise
- Column 5 Date exercise conducted/completed
- Column 6 Type of exercise (select from drop-down menu)
- Column 7 Is the exercise part of a progressive exercise series?
- Column 8 Is exercise identified in the multi-year IPP?
- Column 9 When was the AAR submitted to FEMA?

Appendix C: EMPG Requirements Matrix

ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
1	Allowability	Critical Emergency Supplies Purchases – 5- year viable inventory management plan with a distribution strategy	PGM, NOFO	With work plan submission or amendment (if applicable)	Varies	Work Plan/Amendment
2	Application	Work Plan	NOFO	Per the NOFO	Varies	FEMA GO



ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
4	Closeout	Closeout Reporting Requirements. (Note: FEMA GO does not have a closeout module. Regional closeout processes vary.)	PGM	Per the Closeout notification letter	Varies	FEMA GO/Electronic Notific
5	Cost Share	Cost Share	NOFO	Application, Quarterly, Closeout	Varies	Work Plan Budget, Federal Financial Report (FFR)/SF- (Quarterly and at Closeout)
6	Davis- Bacon	Davis-Bacon Compliance	PGM, NOFO	For all EMPG projects	Varies	Monitoring
7	EHP	EHP approval	PGM, NOFO	Prior to any construction, renovation, or ground disturbing activity	Varies	Email to: CivilRightsEvaluation@hq.o , and cc: Regional EMPG Program Manager
8	EHP	Construction of Communication Towers	PGM, NOFO	FCC Section 106 review must be completed prior to EHP review	Varies	Monitoring
9	EMAC	EMAC association	NOFO	Prior to award	Varies	Regional EMPG Program Manager to verify on EMAC website



ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
10	Exercise	Exercise program negotiated (align with IPP/priorities)	PGM, NOFO	With work plan submission	Varies	Work Plan
11	Exercise	AAR (After Action Report)/IPs	PGM	90 days after completion of exercises conducted in Calendar Year (CY) Q4	Varies	Email to: hseep@fema.dhs and cc: Regional EMPG Pr Manager
12	Priorities	3-5 Applicant and RA mutually agreed upon Priorities (Note: These need not be the national priorities)	NOFO	With work plan submission	Varies	Work Plan
13	Reporting	Threat and Hazard Identification and Risk Assessment (THIRA) submitted	PGM, NOFO	Every 3 years starting in 2022	31- Dec	Prep toolkit
14	Reporting	State Preparedness Review (SPR) submitted	PGM, NOFO	Annually	31- Dec	Prep toolkit



ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
15	Reporting	National Incident Management System (NIMS)	PGM, NOFO	Annually	31- Dec	Unified Reporting Tool (UR
15	Reporting	National Qualification System (NQS) implementation	PGM, NOFO	Phased-in Objectives due Annually	31- Dec	URT
17	Reporting	Distribution Management Plan (DMP) Plan review	PGM	After initial submission, DMP updates submitted annually, as necessary	30- Sep	Email to: Regional EMPG Program Manager
18	Reporting	Multi-year Training and Exercise Plan (TEP)/Integrated Preparedness Plan (IPP) developed	PGM, NOFO	Annually	31- Jan	Email to: hseep@fema.dhs and cc: Regional EMPG Pr Manager



ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
19	Reporting	Periodic Performance Reporting (PPR) Status of all EMPG Program- funded plans, training and exercise activities must be reported quarterly.	PGM	Within 30 days after the end of the CY Quarter	30- Jan 30- Apr 30- July 30- Sep	FEMA GO
20	Reporting	Financial Quarterly Reporting	PGM	Within 30 days after the end of the CY Quarter	30- Jan 30- Apr 30- July 30- Sep	FEMA GO
21	Reporting	Biannual Strategy Implementation Report (BSIR)	PGM	Biannual	No later than: 30- Jan 30- July	FEMA GO



ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
22	Reporting – Exercise	All EMPG Program-funded exercise activities must be reported quarterly.	PGM, NOFO	Quarterly	30- Jan 30- Apr 30- July 30- Sep	Exercise Data Table
23	Reporting – Training	All EMPG Program-funded training activities must be reported quarterly.	PGM, NOFO	Quarterly	30- Jan 30- Apr 30- July 30- Sep	Training Data Table
24	Telecomms	FirstNet	PGM	With work plan submission (if applicable)	Varies	Verified by Regional EMPG Program Manager



ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
25	Telecomms	SAFECOM	PGM	With work plan submission (if applicable)	Varies	Verified by Regional EMPG Program Manager
26	Training	Training activities captured (align with IPP/priorities)	PGM, NOFO	With work plan submission	Varies	Work Plan Training Data Ta PPR template
27	Training	EMPG funded personnel who have completed: Basic Academy OR Professional Development Series AND NIMS	PGM	On-going	Varies	Per Regional Guidance: FEMA GO: with PPR Roster to Regional EMP Program Manager Reviewed During Monito



IC	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
2	Training 8	Training attendance information submitted within 30 days of attendance of training supported with EMPG funding (IB 432)	PGM, NOFO	On-going	Varies	Web-Forms

Appendix D: FY 2025 EMPG Program Allocations

EMPG Program awards are based on section 662 of the *Post-Katrina Emergency Management Reform Act of 2006*, Pub. L. No. 109-295 (codified as amended at 6 U.S.C. § 762). All 50 States, the District of Columbia, and Puerto Rico receive a base amount of 0.75% of the total available funding appropriated for the EMPG Program. Four territories (American Samoa, Guam, the Commonwealth of the Northern Mariana Islands, and the U.S. Virgin Islands) receive a base amount of 0.25% of the total available funding appropriated for the EMPG Program. The remaining balance of the funds appropriated for the EMPG Program are distributed on a population-share basis.

These are target allocations pending final decisions by the Department of Homeland Security. These target allocations act as an estimate, and final allocations may be different in the award letter.

FY 2024 EMPG Funding Target Allocations

State/Territory	Target Allocation	State/Territory	Target Allocation
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Alabama	\$5,273,376	Nevada	\$4,218,945
Alaska	\$2,809,119	New Hampshire	\$3,182,252
Arizona	\$6,625,941	New Jersey	\$7,696,122
Arkansas	\$4,119,030	New Mexico	\$3,584,573
California	\$24,392,241	New York	\$13,478,822
Colorado	\$5,719,526	North Carolina	\$8,558,068
Connecticut	\$4,446,318	North Dakota	\$2,840,601
Delaware	\$2,983,042	Ohio	\$9,025,129
District of Columbia	\$2,787,987	Oklahoma	\$4,680,788
Florida	\$15,434,002	Oregon	\$4,779,512
Georgia	\$8,633,293	Pennsylvania	\$9,691,986



Hawaii	\$3,202,955	Rhode Island	\$3,016,730
Idaho	\$3,512,816	South Carolina	\$5,452,513
Illinois	\$9,486,374	South Dakota	\$2,912,059
Indiana	\$6,258,827	Tennessee	\$6,428,115
lowa	\$4,204,453	Texas	\$19,851,254
Kansas	\$4,053,347	Utah	\$4,350,675
Kentucky	\$4,955,787	Vermont	\$2,758,000
Louisiana	\$4,961,013	Virginia	\$7,311,410
Maine	\$3,180,010	Washington	\$6,835,572
Maryland	\$5,890,070	West Virginia	\$3,383,600
Massachusetts	\$6,377,029	Wisconsin	\$5,721,468



Michigan	\$8,052,915	Wyoming	\$2,724,042
Minnesota	\$5,627,851	Puerto Rico	\$4,183,148
Mississippi	\$4,037,973	U.S. Virgin Islands	\$847,363
Missouri	\$5,880,166	American Samoa	\$826,480
Montana	\$3,030,634	Guam	\$884,565
Nebraska	\$3,514,961	Northern Mariana Islands	\$825,152
Total			\$319,500,000

