The U. S. Department of Homeland Security (DHS) Notice of Funding Opportunity (NOFO) Fiscal Year 2025 Regional Catastrophic Preparedness Grant Program

Release Date: Aug 13, 2025

Download the NOFO.

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1. Basic Information

A. Agency Name	U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA)
B. NOFO Title	Fiscal Year 2025 Regional Catastrophic Preparedness Grant Program (RCPGP)
C. Announcement Type	Initial



D. Funding Opportunity Number	DHS-25-GPD-111-01-99
E. Assistance Listing Number	97.111
F. Expected Total Funding	\$10,800,000 See Appendix A for the FY 2025 RCPGP Target Allocations.
G. Anticipated Number of Awards	6 awards
H. Expected Award Amount	\$1,800,000
I. Projected Application Start Date	08/01/2025 4:00 p.m. Eastern Time (ET)



J. Projected Application End Date	08/15/2025 05:00 p.m. Eastern Time (ET)
K. Anticipated Funding Selection Date	No later than 09/30/2025
L. Anticipated Award Date	No later than 09/30/2025
M. Projected Period of Performance Start Date	10/01/2025
N. Projected Period of Performance End Date	09/30/2028



O. Executive Summary

The Fiscal Year (FY) 2025 RCPGP represents one part of a comprehensive set of actions authorized by Congress and implemented by DHS to build preparedness capabilities. The National Preparedness Goal (the Goal) defines what it means to be prepared for a wide range of threats and hazards, including catastrophic incidents. The National Preparedness System is the instrument the nation employs to build, sustain, and deliver core capabilities needed to achieve the goal of a more secure and resilient nation. Each community contributes to achieving the Goal by addressing the risks that are most relevant and urgent for them individually, which in turn strengthens the collective security and resilience of the nation. Please see Section 3.B "Priorities" of this NOFO for a table of potential RCPGP activities.

The strategic priority for the FY 2025 RCPGP focuses on investing in the following core capabilities: Housing, Community Resilience, and Long-Term Vulnerability Reduction. Community and regionallevel resilience plans and strategies should address the full range of hazards and vulnerabilities affecting the ability of communities to survive and adapt following a disaster. Communities facing severe challenges with housing that is resilient to all hazards or long-term vulnerabilities may use this planning-focused grant to develop specific, targeted resilience strategies and plans, or integrate these challenges into broader approaches. Recipients and regional partners may also use this grant to enhance existing plans and strategies to better address the broad range of resilience challenges they may face. These plans and strategies can serve as a tool for leveraging support for federal investments in infrastructure and other community resilience needs that will enhance regional preparedness.

Furthermore, planning efforts should address the needs of disaster-vulnerable communities that might be at special risk because of current and/or future hazards, including those associated with extreme weather events. By addressing the needs of disaster-vulnerable communities, the FY 2025 RCPGP aims to ensure consistent and systematic, fair, just, and impartial treatment of all individuals before, during, and after a disaster, consistent with applicable law.

When developing project proposals, FEMA encourages applicants to coordinate the provision of the education, tools, and training for emergency managers and other key stakeholders to:



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P. Agency Contact

a. Program Office Contact

GPD's Program Office coordinates the RCPGP application review process and provides support in addressing specific programmatic questions regarding the FY 2025RCPGP. The Program Officecan be reached by e- mailat FEMA-RCPGP@fema.dhs.gov.

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

Following award selection and announcement, FEMA Regional Offices manage, administer, and conduct the application budget review, create the award package, approve, amend, and close out awards, as well as conduct cash analysis, financial and programmatic monitoring, and audit resolution for RCPGP. The Regions also provide technical assistance to RCPGP recipients.

FEMA Regional Office contact information is available at https://www.fema.gov/fema-regional-contacts.

e. Civil Rights

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



2. Eligibility





A. Eligible Entities/Entity Types

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

a. Applicants

1. Eligible Applicants

The State Administrative Agency (SAA) is the only entity eligible to submit FY 2025 RCPGP applications to DHS/FEMA. Each eligible SAA will serve as the official applicant and recipient of RCPGP funds and is responsible for managing the award and ensuring compliance with all program requirements.

The SAAs for the following states are eligible for this funding opportunity:

- Alaska California
- Colorado
- Florida
- North Carolina
- Texas

Eligibility for the FY 2025 RCPGP is limited to these six states based on a risk-informed methodology that prioritizes regions with the greatest need for catastrophic preparedness planning. FEMA considered multiple factors in selecting these states, including regional threat profiles, gaps in catastrophic planning capabilities, and alignment with the program's strategic priorities of readiness and extreme weather resilience. Additionally, selection was informed by regional interdependencies with national security infrastructure, critical defense installations, and related vulnerabilities, including:

- Alaska (Anchorage region): Chosen for its unique geostrategic importance, where critical infrastructure supports military bases that offer simultaneous access to the Arctic and Indo-Pacific regions. Anchorage provides a rare dual-theater capability that is essential for U.S. force projection and national readiness.
- California (San Diego/San Jose): Hosts more than 30 major defense installations across all service branches, with irreplaceable training ranges and specialized capabilities.
 California's military infrastructure and population density demand coordinated regional planning for catastrophic incident response.



B. Project Type Eligibility

a. Unallowable Project Types

- Equipment: Equipment costs are NOT allowed under this program.
- Construction and Renovation: Construction and renovation costs are NOT allowed under this program
- Public Safety Personnel: Hiring personnel to fulfill traditional public safety duties is NOT an allowable cost under this program.
- Maintenance and Sustainment: Maintenance and sustainment costs are NOT allowed under this program.

b. Allowable Project Types

- **Planning:** Planning costs **are allowed** under this program only as described in this funding notice.
- Organization: Organization costs are allowed under this program only as described in this funding notice.
- **Training:** Training costs **are allowed** under this program only as described in this funding notice.
- Exercises: Exercise costs are allowed under this program only as described in this funding notice.
- **Personnel:** Personnel hiring, overtime, and backfill expenses, including related fringe benefits, **are allowed** under this program to perform allowable assessment, planning, training, and exercise activities. Overtime costs for backfill and overtime to enable personnel to train or participate in exercises are allowed under this program only as described in this funding notice.
- Consultants/Contractors: Hiring of full-time or part-time contract planners or consultants to assist with identifying gaps, planning, training, and exercise activities are allowed under this program and must be procured in compliance with 2 C.F.R. §§ 200.317 200.327.
- Travel: Domestic travel costs are allowed under this program, as provided for in this funding notice. International travel is not an allowed cost under this program unless approved in advance by DHS/FEMA.
- Conferences: Rental of space/locations for conferences, meetings, workshops, and webinars are allowed under this program to perform assessments, planning, training, and exercise activities in a manner consistent with 2 C.F.R. § 200.432. Recipients are encouraged to use free public



C. Requirements for Personnel, Partners, and Other Parties

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

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

Additionally, the **Authorized Organization Representative** (AOR) must:

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

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

D. Maximum Number of Applications

The maximum number of applications that can be submitted is:

One application per SAA

See eligibility section above for additional details.



E. Additional Restrictions

The applicants or recipients are required to certify their compliance with federal statues, DHS directives, polices, and procedures.

a. National Incident Management System (NIMS) Implementation

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

Emergency management and incident response activities require carefully managed resources (personnel, teams, facilities, equipment, and/or supplies) to meet incident needs. Utilization of the standardized resource management concepts such as typing, credentialing, and inventorying, promote a strong national mutual aid capability needed to support delivery of core capabilities. Additional information on resource management, NIMS resource typing definitions, job titles, and position qualifications is on FEMA's website at https://www.fema.gov/emergency-managers/nims/components.

FEMA developed the National Incident Management System
Guideline for the National Qualification System to describe
national credentialing standards and to provide written guidance
regarding the use of those standards. This guideline describes
credentialing and typing processes and identifies tools that
Federal Emergency Response Officials and emergency managers
at all levels of government may use both routinely and to facilitate
multijurisdictional coordinated responses.

Although state (including territorial), local, tribal, and private sector partners (including nongovernmental organizations) are not required to credential their personnel in accordance with these guidelines, FEMA strongly encourages them to do so to leverage the federal investment in the Federal Information Processing Standards 201 infrastructure and to facilitate interoperability for personnel deployed outside their home jurisdiction.

Additional information about NIMS in general is available on



F. References for Eligibility Factors within the NOFO	Please see the following references provided below: 1. "Financial Integrity Criteria" subsection 2. "Supplemental Financial Integrity Criteria and Review" subsection 3. FEMA may/will request financial information such as Employer Identification Number (EIN) and bank information as part of the potential award selection. This will apply to everyone prospered, including subrecipients.
G. Cost Sharing Requirement	There is no cost share requirement.
H. Cost Share Description, Type and Restrictions	Not applicable.
I. Cost Sharing Calculation Example	Not applicable.
J. Required information for verifying Cost Share	Not applicable.



3. Program Description

A. Background, Program Purpose, and Program History

Preparedness is a shared responsibility that spans across federal, state, local, tribal, and territorial governments; the private sector; non-governmental organizations; and the American people. It requires an approach that engages individuals, families, communities, private and nonprofit sectors, faith-based organizations, and all levels of government across the whole community. The purpose of the RCPGP is to build state and local capacity to manage catastrophic incidents by improving and expanding regional collaboration, across the whole community.

The National Response Framework (4th Edition or superseding edition) defines a catastrophic incident as any natural or manmade incident, including terrorism, that results in extraordinary levels of mass casualties, damage, or disruption affecting the population, infrastructure, environment, economy, national morale, or government functions. The regional interdependencies of effective prevention, protection, mitigation, response, and recovery activities require a cohesive regional approach to catastrophic planning, to include community-level stakeholder involvement to maximize both regional and community-level resilience. As part of this whole community approach, it is critical that regional catastrophic preparedness investments focus on the needs of disaster-vulnerable communities.

The Fiscal Year (FY) 2025 RCPGP represents one part of a comprehensive set of actions authorized by Congress and implemented by DHS to build preparedness capabilities. The National Preparedness Goal (the Goal) defines what it means to be prepared for a wide range of threats and hazards, including catastrophic incidents. The National Preparedness System is the instrument the nation employs to build, sustain, and deliver core capabilities needed to achieve the goal of a more secure and resilient nation. Each community contributes to achieving the Goal by addressing the risks that are most relevant and urgent for them individually, which in turn strengthens the collective security and resilience of the nation. Please see Section 3.B "Priorities" of this NOFO for a table of potential RCPGP activities.



FY 2025 RCPGP prioritizes investments in the following core capabilities: Housing, Community Resilience, and Long-Term Vulnerability Reduction. Furthermore, priority will be given to those planning efforts that address the needs of disaster-vulnerable communities that might be at special risk because of current and/or future hazards, including those associated with extreme weather events and proximity to critical infrastructure and military installations.

When developing project proposals, FEMA encourages applicants to coordinate the provision of the education, tools, and training for emergency managers and other key stakeholders to:

- Identify and address emerging risks to disaster-vulnerable communities; and
- Plan for and develop research-supported, proactive investments in community resilience.

B. Goals, Objectives, and Priorities

Goals: The goal of the RCPGP is to enhance regional resilience by supporting comprehensive planning, coordination, and collaboration across jurisdictions to improve preparedness, response, recovery, and resilience in the face of catastrophic events.

Objectives: The RCPGP provides resources that supports states and local governments in meeting the following objectives (with associated core capabilities noted in parentheses where applicable):

- Build state and local capacity to manage catastrophic incidents by improving and expanding regional collaboration among emergency managers and other preparedness stakeholders. Involve regional stakeholders in the development of plans to address those core capabilities that present persistent preparedness challenges, with specific focus on community-level resilience, and an emphasis on addressing the needs of disaster-vulnerable communities and long-term vulnerability reduction within those communities.
- Establish a resilient and sustainable housing market that addressed identified vulnerabilities and meets the needs of the community, including the need for accessible housing within the specified time frame in the recovery plan. (Housing).



- Assess preliminary housing impacts and needs, identify currently available options for temporary housing, and plan for permanent housing. (Housing)
- Ensure community housing recovery plans continue to address interim housing needs, assess options for permanent housing, and define a timeline for achieving a resilient, accessible, and sustainable housing market. (Housing)
- Maximize the coverage of the U.S. population that has a localized, riskinformed mitigation plan developed through partnerships across the entire community. (Community Resilience)
- Empower individuals and communities to make informed decisions to facilitate actions necessary to adapt to, withstand, and quickly recover from future incidents. (Community Resilience)
- Achieve a measurable decrease in the long-term vulnerability of the Nation against current baselines amid a growing population base, changing threat conditions, increasing reliance upon information technology, and expanding infrastructure base. (Long-term Vulnerability Reduction)

In addition to the objectives above, the core capability descriptions can help guide development FY 2025 RCPGP project proposals, as explained below.

FEMA defines the Housing core capability as:

Implement housing solutions that effectively support the needs of the whole community and contribute to its sustainability and resilience.

■ FEMA defines the Community Resilience core capability as:

Enable the recognition, understanding, communication of, and planning for risk and empower individuals and communities to make informed risk management decisions necessary to adapt to, withstand, and quickly recover from future incidents.

■ FEMA defines the Long-term Vulnerability Reduction core capability as:

Build and sustain resilient systems, communities, and critical infrastructure and key resources lifelines so as to reduce their vulnerability to natural, technological, and human-caused threats and hazards by lessening the likelihood, severity, and duration of the adverse consequences.



Priorities:

The strategic priorities of the RCPGP are readiness and extreme weather resilience. These priorities can also be viewed as strategic outcomes for RCPGP-funded projects. When developing RCPGP project proposals, applicants should consider how the proposed project can address these priorities and produce meaningful results, using the National Resilience Guidance | FEMA.gov and the other planning resources referenced in the section as a guide.

The FY 2025 RCPGP also prioritizes development of core capabilities that present persistent preparedness challenges, focusing on community-level resilience, longterm vulnerability reduction, and housing, with emphasis on addressing the needs of disaster-vulnerable communities specific to readiness and extreme weather resilience. To accomplish these priorities, the FY 2025 RCPGP requires that applicants develop and deliver **one planning project** that addresses specific capability gaps based on Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR) results and focuses on housing, community resilience, AND/OR long-term vulnerability reduction (i.e., must address one or more of the three core capability focus areas), with an emphasis on disaster-vulnerable communities (including areas surrounding critical infrastructure and military installations), within the strategic priorities of **readiness** and extreme weather resilience. Furthermore, the project must be regional in nature, meaning that the geographic reach of the project should span the entire state or large, high-risk areas within the state. Additionally, FY 2025 RCPGP applicants are encouraged to develop projects that build a continuous cycle of planning, organizing, training, and exercising with regional partners across the whole community to improve their collective readiness posture. This includes use of RCPGP funding to: formalize new or sustain existing interdisciplinary working groups for effective coordination of planning efforts; ensure synchronization of plans and shared best practices; implement citizen and community preparedness campaigns; and develop plans for pre-positioning of needed commodities and equipment.

RCPGP	
Focus Area	l

Examples of Allowable Activities



Community Resilience

- Partner with local community leaders, emergency managers, advocacy groups, and other key stakeholders to develop localized, risk-informed mitigation plans. Identify potential funding sources for essential mitigation activities. Develop a unified, regional mitigation plan that addresses the needs of disaster-vulnerable communities and supports the local community mitigation plans.
- Develop a plan to provide necessary outreach and training to leaders and other key stakeholders representing disaster-vulnerable communities to enable and empower individuals and communities to make informed decisions to facilitate actions necessary to adapt to, withstand, and quickly recover from disasters.
- Conduct outreach and training with local community leaders and partners to identify at-risk, disaster-vulnerable communities, analyze their risks, capabilities, and needs, and address those needs as part of a broader planning project that aims to improve community-level resilience.
- Partner with local community leaders, emergency managers, and other key stakeholders to exercise emergency operations plans to identify gaps in preparedness capabilities that affect the resilience of disaster-vulnerable communities.

Long-Term Vulnerability Reduction

- Conduct a comprehensive regional vulnerability assessment aimed at understanding the needs of disaster-vulnerable communities relative to identified capability gaps.
- In coordination with local community leaders and other key stakeholders, analyze long-term vulnerabilities affecting communities across the region and develop a plan for mitigating the identified vulnerabilities.
- Conduct outreach and training with local community leaders and partners to identify at-risk, disaster-vulnerable communities, analyze their long-term vulnerabilities, current capabilities, and long-term needs, and address those needs as part of a broader project that includes developing a plan for reducing vulnerabilities in affected communities.



Housing

- Establish a resilient and sustainable housing market that meets the needs of the community, including the need for accessible and affordable housing in coordination with community development/housing entities and other key stakeholders.
- Partner with local community leaders, housing organizations and agencies, community development officials, emergency managers, and other key stakeholders to integrate efforts and review applicable state and local housing assessments, like the Department of Housing and Urban Development's Consolidated Plans and Action Plans, which are designed to assess affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions.
- Conduct assessments of housing stock in disaster-vulnerable communities to determine investment strategies to make existing housing more resilient to all hazards.
- Develop strategies to address common barriers to housing reconstruction or redevelopment.
- Conduct a gap analysis to determine greatest current housing need and most disaster-vulnerable / at-risk housing stock to identify areas with greatest gaps to prioritize
- Develop a unified, regional housing plan that addresses the needs of disaster-vulnerable communities and other disaster-vulnerable populations and supports the local community planning goals.
- Develop a unified regional plan for upgrading existing housing stock to be more resilient to weather related threats and all other hazards.
- Develop a regional housing plan that addresses housing instability caused by weather related threats and includes solutions to increase communities' resilience.
- Identify and address gaps in resilient housing for communities with disabilities and/or access and functional needs as well as pet/animal sheltering.
- Conduct trainings with regional partners on topics related to housing resilience.
- Develop a unified regional plan for long-term housing after a catastrophic event that identifies and takes steps to rectify capability gaps related to increasing the number of people able to find and secure affordable and resilient long-term housing after a disaster focusing on populations more impacted by disasters.
- In coordination with local community leaders and other key stakeholders, review existing disaster housing plans and update as needed to ensure compliance with the latest planning and disaster housing guidance (see reference links below) with a focus on the needs of disaster-vulnerable communities



Planning Resources

A wealth of guidance is available on the internet that can be leveraged to inform and aid development of RCPGP application. Applicants are advised to conduct their own research but should consider reviewing the information available through FEMA's website and other websites such as those listed below, which represent a partial listing of publicly available planning resources.

- National Preparedness | FEMA.gov
- Resilience | Homeland Security
- Planning Guides | FEMA.gov
- National Resilience Guidance | FEMA.gov
- Planning Considerations: Disaster Housing (fema.gov)
- Home | FEMA Community Disaster Resilience Zones
- Resilience Analysis and Planning Tool (RAPT) | FEMA.gov
- Community Resilience Estimates (census.gov)
- Recovery and Resilience Resource Library | FEMA.gov
- Roadmap to Federal Resources for Disaster Recovery | FEMA.gov
- Community Recovery Management Toolkit | FEMA.gov
- Individuals and Communities | FEMA.gov
- Risk Management | FEMA.gov
- Mitigation Best Practices | FEMA.gov
- Hazard Mitigation Planning | FEMA.gov
- Building Science | FEMA.gov
- Tools for Practitioners | FEMA.gov
- Preparedness Toolkit (fema.gov)
- FEMA Case Study Library | FEMA.gov
- Housing Counseling Disaster Resources HUD Exchange
- HUD Disaster Resources | HUD.gov / U.S. Department of Housing and Urban Development (HUD)
- PrepTalks | FEMA.gov
- National Low Income Housing Coalition (nlihc.org)

Supplemental Guidance on 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 the 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 should 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 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



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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.

Supplemental Readiness Guidance

As disasters become more frequent, severe, and complex, the demands placed upon the emergency management community, as well as federal resources, 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 all levels of government, as well as the private sector, the nonprofit sector, and among individuals. The National Capability Targets provide a shared vision of the staff, 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. Program Rationale



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The stated goals, objectives, and priorities of RCPGP support the Full-Year Continuing Appropriations and Extensions Act, 2025, Pub. L. No. 119-2 as authorized and appropriated by Congress.

D. Federal Assistance Type

Grant

E. Performance Measures and Targets

Communities provide data on their proficiency across 32 core capabilities through the THIRA/SPR, after-action reports, and other preparedness data. FEMA's evaluation of FY 2025 project proposals will be measured against core capability gaps identified through relevant THIRA/SPR reports and the potential impact the proposed project will have on improving those capabilities.

To evaluate program performance, FEMA will measure the percent change in targeted capability gaps and percent improvement in the *Housing, Community Resilience*, and *Long-Term Vulnerability Reduction* core capabilities, as reported through the required THIRA/SPR covering the community. Thus, FEMA will rely upon the award recipients to develop performance measures and targets that are specific to their preparedness needs, based on the applicable THIRA/SPR results.

FEMA will compare the community's current baseline capability level of the Housing, Community Resilience, and/or Long-Term Vulnerability Reduction core capabilities against the capability level as reported at the end of the grant. Baseline capability assessments will be taken from the calendar year 2024 THIRA/SPR data; end of the grant performance data will be drawn from the calendar year 2028 THIRA/SPR data.

The capability assessments FEMA will use in the RCPGP performance analysis are guided by the standard measures listed below (the applicants will provide the relevant (#)'s and (time)'s based on their current level of capability and desired/target level of capability that will be achieved with RCPGP grant funds).

1. Housing: Within (#) (time) of an incident, (#) people requiring long-term housing, including (#) people with access and functional needs requiring



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accessible long-term housing, find and secure long-term housing.

2. Community Resilience:

- Within (#) (time), (#) households are covered by risk-appropriate insurance, including homeowners, flood, windstorm, and seismic.
- Every (#) (time frequency), conduct (#) outreach events or activities to increase awareness of locally significant threats and hazards to help the residents be more prepared to prevent, protect against, mitigate, respond to, and recover from those events.
- 3. Long Term Vulnerability Reduction. Every (#) (time), (#) jurisdictions review their building codes, and, if necessary, enact or update risk-appropriate (i.e., concerning the risk faced by that particular area), disaster resilient building codes (see FEMA's Building Codes Documents for more information).

Recognizing that capability needs can vary significantly across different jurisdictions and there may be better ways to measure the effectiveness of a project against a specific core capability, the performance measures listed above should be viewed as examples only. Applicants are permitted to develop their own performance measures to suit the unique capability evaluation needs of the covered communities. As stated above, FEMA will compare the community's current baseline capability level of the *Housing*, *Community Resilience*, and/or *Long-Term Vulnerability Reduction* core capabilities against the capability level as reported at the end of the grant. Therefore, the only requirement is that the customized performance measure enable a quantitative comparison of the applicable capability both before and after completion of the funded project.

F. Program-Specific Unallowable Costs

Funds may not be used for the following:

- Equipment costs;
- Construction and renovation costs:
- Hiring personnel to fulfill traditional public safety duties; or
- Maintenance and sustainment costs

G. General Funding Requirements



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

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

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

H. Indirect Costs (Facilities and Administrative Costs)

Indirect costs are allowed for recipients.

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

I. Management and Administration (M&A) Costs



Award recipients may use up to 5% of the RCPGP federal award amount for M&A purposes.

M&A activities are those defined as directly relating to the management and administration of RCPGP funds, such as financial management, reporting, and program and financial monitoring. M&A are not operational costs but are necessary costs incurred in direct support of the federal award or as a consequence of it, such as travel, meeting-related expenses, and salaries of full/part-time staff in direct support of the program. As such, M&A costs can be itemized in financial reports.

Some examples of M&A costs include grants management training for M&A staff, equipment and supplies for M&A staff to administer the RCPGP grant, travel costs for M&A staff to attend conferences or training related to the RCPGP, 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. 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 Emergency Management Agency (EMA) chooses to assign personnel to specific M&A activities. In this case, personnel and fringe benefits for M&A costs are allowable.

J. Pre-Award Costs

Pre-award costs are allowable only with the prior written approval of DHS/FEMA and as included in the award agreement. To request pre-award costs, a written request must be included with the application, signed by the Authorized Representative of the entity. The letter must outline what the pre-award costs are for, including a detailed budget break-out of pre-award costs from the post-award costs, and a justification for approval.

K. Beneficiary Eligibility



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

L. Participant Eligibility

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

M. Authorizing Authority

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

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

Recipients, sub-recipients, and their contractors or subcontractors must comply with the prohibitions set forth in Section 889 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which restrict the purchase of covered telecommunications and surveillance equipment and services. Please see 2 C.F.R. §§ 200.216, 200.327, 200.471, and Appendix II to 2 C.F.R. Part 200, and FEMA Policy #405-143-1 - Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services for more information.

4. Application Contents and Format

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

Not applicable



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B. Application Content and Format

See Appendix B "Project Narrative Template"

C. Application Components

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

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

D. Program-Specific Required Documents and Information

RCPGP-specific submission requirements include a project narrative, a budget worksheet and budget narrative (see <u>Appendix C "Budget Detail Worksheet and Budget Narrative Template"</u> for atemplate that applicants may use), and information regarding regional preparedness partners, as described below. All ratives must conform with the guidance provided in <u>Appendix B "Project Narrative Template"</u>.

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

- A written, signed statement explaining the regional impact of the proposed investment.
- Names of all entities partnering on the project, including but not limited to states, territories, local or tribal governments, nonprofit organizations,



and other non-governmental entities. Partner entities can extend beyond the boundaries of the state and can be located in other states for the purposes of regional collaboration.

- Letters of support from partner entities or a written, signed statement certifying the involvement and support of all partner entities that will participate in the proposed project and, if applicable, information on the relationship between the applicants and partnering entities, e.g., existing letters of cooperation/support or administrative agreements, such as a signed Memorandum of Understanding.
- A list of all counties and disaster-vulnerable communities that will be involved in the project and will directly benefit from the project.

The involvement of regional preparedness partners is critical to the success of this program. Therefore, DHS/FEMA will take necessary actions to verify the accuracy of written statements that are submitted to satisfy the requirements outlined above. Applications found to contain false or inaccurate information will be rejected. In addition, FEMA will conduct post-award monitoring activities to verify that RCPGP-funded projects are carried out

in accordance with the terms and conditions of the award, to include verifying the involvement of committed partner entities and other project details as indicated in the application. Failure to comply with the terms and conditions of the award is addressed in Section 3.B.h. "Actions to Address Noncompliance" of this funding notice.

Applicants not familiar with conducting their own THIRA/SPR should consult with their SAA to utilize the SAA's THIRA/SPR information or for help developing capability assessments as part of their application. For additional information on the THIRA/SPR, also refer to the Comprehensive Preparedness Guide (CPG) 201, Third Edition.

The RCPGP recipients should include their community's capability levels and target statements—for all core capabilities identified as priorities under the FY 2025 RCPGP (i.e., *Community Resilience*, *Long-Term Vulnerability Reduction*, and Housing) into their own THIRA/SPR, and/or incorporate their results of those capability assessments into their SAA's THIRA/SPR.

The following eligibility criteria apply for projects submitted as part of this application:



- Proposed capability-building projects should be regional (spanning the entire state or large, high-risk areas within the state) and benefit multi-state or intrastate regions.
- Applicants should propose a capability-building project that is replicable and/or sustainable after the grant period of performance ends.
- Recipients should plan to sustain these new capabilities in subsequent years with non- federal resources.
- Each project can address more than one of the Planning, Organization, Training, or Exercise solution areas. Investing in these areas will promote the creation of new capabilities among recipients. **Equipment purchases are not allowed under RCPGP**.

For more information on the Planning, Organization, Training, or Exercise solution areas, refer to the <u>CPG 201, Third Edition</u>. For further information on application forms or information to submit, see Section 4 "Content and Form of Application Submission." For further information on funding restrictions and allowable costs, see Section F "Program-Specific Unallowable Costs" and G "General Funding Requirements."

E. Post-Application Requirements for Successful Applicants

a. Grant Agreement and Acceptance

The recipients must review, sign, and return the grant agreement to formalize acceptance of the award and its terms.

b. Additional Application Material

With FEMA's approval, applicants may submit certain required information post award. For detailed guidance, please refer to the award letter or contact your assigned FEMA HQ Preparedness Officer.

c. General Information About Post-Federal Award Reporting Requirements

Award recipients must submit the following reports: quarterly financial reports, semi-annual performance reports, final financial and performance reports, and an annual audit report (if required). These must follow the Part 200 Uniform



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

5. Submission Requirements and Deadlines

A. Address to Request Application Package

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

Steps Required to Apply for an Award and Submit an Application:

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

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



Per <u>2 C.F.R.</u> § <u>25.110(a)(2)(iv)</u>, if an applicants is experiencing exigent circumstances that prevents it from obtaining an UEI number and completing SAM registration prior to receiving a federal award, the applicants 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 Unique Entity Identifier (UEI) number, Employer Identification Number (EIN), and an active System for Award Management (SAM) registration.

Obtain a UEI Number:

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

Obtain Employer Identification Number:

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



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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 on Grants.gov.

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

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

B. Application Deadline

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

C. Pre-Application Requirements Deadline

Not applicable.

D. Post-Application Requirements Deadline

Not applicable.

E. Effects of Missing the Deadline

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



deadline.

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

6. Intergovernmental Review

A. Requirement Description and State Single Point of Contact

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

7. Application Review Information

A. Threshold Criteria

FEMA will evaluate applicants and project eligibility based on the criteria included in this NOFO. Ineligible applications will not be reviewed or considered for award.

B. Application Criteria

a. Programmatic Criteria

In support of the FY 2025 RCPGP priorities, FEMA's evaluation of the proposed project will be measured against <u>core capability</u> gaps identified through relevant THIRA/SPR reports and the potential impact the proposed project will have on improving those capabilities. Additionally, FEMA will evaluate the project's effectiveness in addressing extreme weather resilience, readiness, and the benefit to disaster-vulnerable communities.

In general, project proposals should clearly explain:

 Which disaster-vulnerable communities will be involved in the project and will benefit from the project, along with an explanation of any additional risk factors



that make those communities particularly vulnerable relative to extreme weather and other catastrophic events;

- How representatives of those disaster-vulnerable communities will participate or otherwise be involved in the project;
- How the project will clearly benefit disaster-vulnerable communities, including the anticipated impact described in both qualitative and quantitative terms.
- FEMA also expects that the applicants will demonstrate use of appropriate analytical tools to identify specific risks and vulnerabilities and reference those analytics to help justify their proposed project. Some useful analytic tools include:
- Resilience Analysis and Planning Tool (RAPT)
- Community Resilience Estimates (census.gov)

See <u>Appendix B "Project Narrative Template"</u> for the requirements for addressing the above considerations and other guidance for completing the narrative portion of the application.

The application must conform with the guidance provided in <u>Appendix B "Project Narrative Template"</u>. The application will be evaluated for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed Project Narrative template. Below is a summary of the evaluation criteria.

- Need: The applicants demonstrate need for grant funds, including identifying their current capabilities (as applicable) and associated gaps/needs for a project to build beyond current capabilities within the core capabilities of interest.
- Project Design: The applicants demonstrate an effective and sustainable project approach for building their current capability within the 36-month period of performance, including the specific project implementation, project management, and regional collaboration approaches.
- 3. Impact: The applicants demonstrate the proposed project's regional impact, including how the project will build the applicant's capabilities, performance measures the project is expected to achieve, and how the project can be scaled or replicated to benefit national preparedness.
- 4. Budget: The applicants demonstrate a reasonable and cost-effective budget (based on the Budget Detail Worksheet and Project Narrative), including



explanation of reasonable project costs across the requested categories, the project's relative cost effectiveness and sustainability, and the applicant's ability to manage federal grants.

b. Review and Selection Process

1. Initial Review

Eligibility Screening: FEMA will conduct an initial review of all FY 2025 RCPGP applications to verify applicants' eligibility and ensure each application is complete. All eligible and complete applications will progress to the review panel phase for further review. FEMA will not process incomplete applications for further review and will not consider them for funding.

FEMA staff will review the following during the eligibility screening:

- Applicant is an eligible jurisdiction as defined under the <u>"Eligible Applicants"</u> header of Section 2 of this funding notice.
- Applicant has conformed to the Eligibility Criteria in Section 2 of this funding notice.
- Applicant has submitted all required assurances and standard forms.
- Application includes a Project Narrative that aligns with the format requirements specified in Appendix B "Project Narrative Template".
- Application includes a Budget Detail Worksheet and Budget Narrative (Appendix C "Budget Detail Worksheet Template").

2. Application Review Process

The application review process includes an initial eligibility and completeness review followed by an effectiveness review conducted by FEMA staff. The initial eligibility review examines whether the application meets the eligibility rules outlined in Section 2 as well as the application content requirements in Section 4. Applications that do not meet eligibility and content requirements will not be evaluated and scored by the review panel.

The effectiveness review will examine the proposed project based on specific criteria aligned to the requirements outlined in Appendix B "Project Narrative"



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Template".

3. Application Selection Process

Not applicable.

C. Financial Integrity Criteria

Before making an award, FEMA is required to review OMB-designated databases for applicants' eligibility and financial integrity information. This is required by <a href="mailto:the-name="mailto

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

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

D. Supplemental Financial Integrity Criteria and Review

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

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

E. Reviewers and Reviewer Selection



Eligibility, completeness, and effectiveness reviews will be conducted by program staff at FEMA headquarters.

F. Merit Review Process

Not applicable.

G. Final Selection

Not applicable.

8. 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 and the material terms and conditions of the federal award, should they receive an award.

FEMA will provide the federal award package to the applicants 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 recipients accept 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 **time frame** may result in a loss of funds.

B. Pass-Through Requirements



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Not applicable.

C. Note Regarding Pre-Award Costs

Even if pre-award costs are allowed, beginning performance is at the applicant's 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.

9. Post-Award Requirements and Administration

A. Administrative and National Policy Requirements

Presidential Executive Orders

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

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

Subrecipient Monitoring and Management



Not applicable. Subawards are not allowed under the RCPGP.

National Incident Management System (NIMS) Implementation

In expending funds under this program, recipients that are state, local, tribal, or territorial governments must ensure and maintain adoption and implementation of NIMS. The state, local, tribal, or territorial government must show adoption of NIMS during any point of the period of performance.

The list of objectives used for progress and achievement reporting is at https://www.fema.gov/emergency-managers/nims/implementation-training.

Emergency management and incident response activities require carefully managed resources (personnel, teams, facilities, equipment, and/or supplies) to meet incident needs. Using standardized resource management concepts such as typing, credentialing, and inventorying, promote a strong national mutual aid capability needed to support delivery of core capabilities. Additional information on resource management, NIMS resource typing definitions, job titles, and position qualifications is on FEMA's website at https://www.fema.gov/emergency-managers/nims/components.

FEMA developed the National Incident Management System Guideline for the National Qualification System to describe national credentialing standards and to provide written guidance regarding the use of those standards. This guideline describes credentialing and typing processes and identifies tools which Federal Emergency Response Officials and emergency managers at all levels of government may use both routinely and to facilitate multi-jurisdictional coordinated responses.

Although state, local, tribal, and private sector partners (including nongovernmental organizations) are not required to credential their personnel in accordance with these guidelines, FEMA strongly encourages them to do so to leverage the federal investment in the Federal Information Processing Standards 201 infrastructure and to facilitate interoperability for personnel deployed outside their home jurisdiction.

Additional information about NIMS in general is available at https://www.fema.gov/emergency-managers/nims.



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

- 1. Recipients must report obligations and expenditures through a federal financial report. The Federal Financial Report (FFR) form, also known as Standard Form 425 (SF-425), is available online at: SF-425 OMB #4040-0014.
- 2. Recipients must submit the FFR quarterly throughout the period of performance (POP) as detailed below:

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

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

FEMA may withhold future federal awards and cash payments if the recipient does not submit timely financial reports or the financial reports submitted demonstrate lack of progress or provide insufficient detail.

D. Programmatic Performance Reporting Requirements



- 1. A Performance Report must be submitted semi-annually throughout the POP.
- 2. A Performance Report must include:
- Provide a brief narrative of the overall project status;
- Identify accomplishments and milestones achieved as they related to building the approved project by Planning, Organization, Training, and Exercises;
- Summarize build expenditures by Planning, Organization, Training, and Exercises;
- Explain how your project addresses readiness (if applicable), including the tasks associated with the project that directly addresses readiness;
- Describe any potential issues that may affect project completion; and
- Describe any potential changes to the selected performance measures for the project.
- The Progress Report must be submitted through FEMA GO.
- 4. Performance Report Due Dates

Reporting Period	Report Due Date
January 1-June 30	July 30
July 1–December 31	January 30

E. Closeout Reporting Requirements

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

- 1. The final request for payment, if applicable.
- 2. The final FFR.
- The final progress report detailing all accomplishments. The recipient must include with the final progress report an inventory of all construction projects.
- 4. A qualitative narrative summary of the impact of those accomplishments throughout the period of performance.



5. Other documents required by this NOFO, terms and conditions of the federal award, or other DHS Component guidance.

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

Also, pass-through entities are responsible for closing out those subawards as described in <u>2 C.F.R.</u> § <u>200.344</u>; subrecipients are still required to submit closeout materials within 90 calendar days of the subaward period of performance end date. When a subrecipient completes all closeout requirements, pass-through entities must promptly complete all closeout actions in time for the recipient to submit all necessary documentation and information to FEMA during the closeout of their prime award. The recipient is responsible for returning any balances of unobligated or unliquidated funds that have been drawn down that are not authorized to be retained per 2 C.F.R. § 200.344(e).

Administrative Closeout

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

Additional Reporting Requirements

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

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

Before entering into a federal award, the applicants must notify FEMA if it knows that the applicants or any of the principals (as defined at 2 C.F.R. § 180.995) for



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the federal award:

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

This is requirement is fully described in 2 C.F.R. §180.335.

Additionally, <u>2 C.F.R.</u> § 180.350 requires recipients to provide immediate notice to FEMA at any time after entering a federal award if:

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

G. Reporting of Matters Related to Recipient Integrity and Performance

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

If the total value of all active federal grants, cooperative agreements, and procurement contracts for a recipient exceeds \$10,000,000 at any time during the period of performance:

- 1. The recipient must maintain the currency of information reported in SAM.gov about civil, criminal, or administrative proceedings described in paragraph 2 of Appendix XII:
- 2. The required reporting frequency is described in paragraph 4 of Appendix XII.

H. Single Audit Report



A recipient expending \$1,000,000 or more in federal awards (as defined by 2 C.F.R. § 200.1) during its fiscal year must undergo an audit. This may be either a single audit complying with 2 C.F.R. § 200.514 or a program-specific audit complying with 2 C.F.R. §§ 200.501 and 200.507. Audits must follow 2 C.F.R. Part 200, Subpart F, 2 C.F.R. § 200.501, and the U.S. Government Accountability Office (GAO) Generally Accepted Government Auditing Standards.

I. Monitoring and Oversight

Per <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.

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

J. Program Evaluation

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



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learned, as part of demonstrating recipient performance (2 C.F.R. § 200.301).

K. Additional Performance Reporting Requirements

Not applicable.

L. Termination of the Federal Award

- 1. Paragraph C.XL of the FY 2025 DHS Standard Terms and Conditions, v.3 sets forth a term and condition entitled "Termination of a Federal Award" that largely mirrors the termination condition listed below, although they are not identical. 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 for any of the following reasons apply:
- i. If DHS/FEMA, in its sole discretion, determines that a specific award objective is ineffective at achieving program goals as described in this NOFO;
- ii. If DHS/FEMA, in its sole discretion, determines than an objective of the award as described in this NOFO will be ineffective at achieving program goals or agency priorities;
- iii. If DHS/FEMA, in its sole discretion, determines that the design of the grant program is flawed relative to program goals or agency priorities;
- iv. If DHS/FEMA, in its sole discretion, determines that the grant program is not aligned to either the DHS Strategic Plan, the FEMA Strategic Plan, or successor policies or documents;
- v. If DHS/FEMA, in its sole discretion, changes or re-evaluates the goals or priorities of the grant program and determines that the award will be ineffective at achieving the updated program goals or agency priorities; or
- vi. For other reasons described in the termination notice provided to the recipient pursuant to 2 C.F.R. § 200.341.
- vii. If the awardee falls out of compliance with the Agency's statutory or regulatory authority, award terms and conditions, or other applicable laws
- 3. Termination of a Subaward by the Pass-Through Entity

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



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

4. Termination by the Recipient or Subrecipient

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

5. Impacts of Termination

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

6. Notification requirements

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



on the date of the notification unless stated otherwise in the notification.

7. Opportunities to Object and Appeals

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

8. Effects of Suspension and Termination

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

M. Best Practices

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

N.Payment Information

Recipients will submit payment requests in FEMA GO for 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.</u> ?§ 200.305. ?These measures ensure funds are disbursed appropriately while continuing to support and prioritize communities who rely on FEMA for assistance. Once a recipient submits a payment request,



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

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

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



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timeline.

Submission Process

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

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

- 1. Grant ID / Award Number
- 2. Total amount requested for drawdown
- 3. Purpose of drawdown and timeframe covered (must be within the award performance period)
- 4. Subrecipient Funding Details (if applicable).
- Is funding provided directly or indirectly to an 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 CFR 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.

10. Other Information

A. Period of Performance Extension

Extensions to the period of performance are allowed.

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

B. Other Information

a. Environmental Planning and Historic Preservation (EHP) Compliance

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

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



FEMA is sometimes required to consult with other regulatory agencies and the public in order to complete the review process. Federal law requires EHP review to be completed before federal funds are released to carry out proposed projects. FEMA may not be able to fund projects that are not in compliance with applicable EHP laws, Executive Orders, regulations, and policies. FEMA may recommend mitigation measures and/or alternative courses of action to lessen impacts to EHP resources and bring the project into EHP compliance.

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

All FEMA actions, including grants, must comply with National Flood Insurance Program (NFIP) criteria or any more restrictive federal, state, or local floodplain management standards or building code (44 C.F.R. § 9.11(d)(6)). For actions located within or that may affect a floodplain or wetland, the following alternatives must be considered: a) no action; b) alternative locations; and c) alternative actions, including alternative actions that use natural features or nature-based solutions. Where possible, natural features and nature-based solutions shall be used. If not practicable as an alternative on their own, natural features and nature-based solutions may be incorporated into actions as minimization measures.

The GPD EHP screening form is located at https://www.fema.gov/sites/default/files/documents/fema_ehp-screening_form_ff-207-fy-21-100_5-26-2021.pdf.

b. Procurement Integrity

When purchasing under a FEMA award, recipients and subrecipients must comply with the federal procurement standards in <u>2 C.F.R. §§ 200.317 – 200.327</u>. To assist with determining whether an action is a procurement or instead a subaward, please consult <u>2 C.F.R. § 200.331</u>.

For detailed guidance on the federal procurement standards, recipients and subrecipients should refer to various materials issued by FEMA's Procurement Disaster Assistance Team (PDAT). Additional resources, including an upcoming



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trainings schedule can be found on the PDAT Website: https://www.fema.gov/grants/procurement.

Under <u>2 C.F.R.</u> § <u>200.317</u>, when procuring property and services under a federal award, States (including territories) and Indian Tribes, must follow the same policies and procedures they use for procurements from their non-federal funds; additionally, states and Indian Tribes must now follow <u>2 CFR 200.322</u> regarding domestic preferences for Procurements and <u>2 C.F.R.</u> § <u>200.327</u> regarding required contract provisions.

Local government and nonprofit recipients or subrecipients must have and use their own documented procurement procedures that reflect applicable State, Local, Tribal, and Territorial (SLTT) laws and regulations, provided that the procurements conform to applicable federal law and the standards identified in 2 C.F.R. Part 200.

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

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

More information on OMB's revisions to the federal procurement standards can be found in Purchasing Under a FEMA Award: 2024 OMB Revisions Fact Sheet.

2. Competition and Conflicts of Interest

2 C.F.R. § 200.319(b), applicable to local government and nonprofit recipients or subrecipients, requires that contractors that develop or draft specifications, requirements statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. FEMA considers these actions to be an organizational conflict of interest and interprets this restriction as applying to contractors that help a recipient or subrecipient develop its grant application, project plans, or project budget. This prohibition



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also applies to the use of former employees to manage the grant or carry out a contract when those former employees worked on such activities while they were employees of the recipient or subrecipient.

Under this prohibition, unless the recipient or subrecipient solicits for and awards a contract covering both development and execution of specifications (or similar elements as described above), and this contract was procured in compliance with 2 C.F.R. §§ 200.317 – 200.327, federal funds cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of those specifications. This rule applies to all contracts funded with federal grant funds, including preaward costs, such as grant writer fees, as well as post- award costs, such as grant management fees.

In addition to organizational conflicts of interest, situations considered to be restrictive of competition include, but are not limited to:

- Placing unreasonable requirements on firms for them to qualify to do business;
- Requiring unnecessary experience and excessive bonding;
- Noncompetitive pricing practices between firms or between affiliated companies;
- Noncompetitive contracts to consultants that are on retainer contracts;
- Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance or other relevant requirements of the procurement; and
- Any arbitrary action in the procurement process.

Under 2 C.F.R. § 200.318(c)(1), local government and nonprofit recipients or subrecipients are required to maintain written standards of conduct covering conflicts of interest and governing the actions of their employees engaged in the selection, award, and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such conflicts of interest would arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agen



the recipient or subrecipient may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the recipient or subrecipient may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The recipient's or subrecipient's standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents.

Under 2 C.F.R. 200.318(c)(2), if the local government and nonprofit recipient or subrecipient has a parent, affiliate, or subsidiary organization that is not a SLTT government, the recipient or subrecipient must also maintain written standards of conduct covering organizational conflicts of interest.

Organizational conflict of interest means

that because of a relationship with a parent company, affiliate, or subsidiary organization, the recipient or subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. The recipient or subrecipient must disclose in writing any potential conflicts of interest to FEMA or the pass-through entity in accordance with applicable FEMA policy.

3. Supply Schedules and Purchasing Programs

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

Information about GSA programs for states, Indian Tribes, and local governments, and their instrumentalities, can be found at <u>Purchasing Resources and Support for State and Local Governments.pdf</u>

Help for state, local, and tribal governments to make MAS buys | GSA and https://www.gsa.gov/buying-selling/purchasing- programs/gsa-schedule-buyers/state-and-local-governments.

4. Procurement Documentation

Per <u>2 C.F.R.</u> § <u>200.318(i)</u>, local government and nonprofit recipients or subrecipients are required to maintain and retain records sufficient to detail the history of procurement covering at least the rationale for the procurement method,



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

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

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

c. Mandatory Disclosures

The non-Federal entity or applicants 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)

d. 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.

e. Record Retention

1. Record Retention Period



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

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

2. Types of Records to Retain

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

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

f. Actions to Address Noncompliance

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

In the case of any potential or actual noncompliance, FEMA may place special conditions on an award per <u>2 C.F.R. §§ 200.208</u> and <u>200.339</u>. FEMA may place a hold on funds until the matter is corrected, or additional information is provided per 2 C.F.R. § 200.339, or it may do both. Similar remedies for noncompliance



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with certain federal civil rights laws are authorized pursuant to <u>44 C.F.R. Part 7</u> and 44 C.F.R. Part 19 or other applicable regulations.

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

g. Audits

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

11. Appendix A: FY 2025 RCPGP Target Allocations

State FY 2025	Target Allocation
Alaska	\$1,800,000
California	\$1,800,000
Colorado	\$1,800,000
Florida	\$1,800,000
North Carolina	\$1,800,000
Texas	\$1,800,000
Total	\$ 10,800,000



12. Appendix B: Project Narrative Template

Required Format

Applicants must format the application according to the following guidance:

- Document Type: The Project Narrative must be submitted in Microsoft Word or Adobe PDF
- Spacing: Single
- Typeface:
 - Narrative: Times New Roman, Arial, Calibri, or Cambria; 12 pt. font size
 - Citations (in-text, endnote/footnote): Times New Roman, Arial, Calibri, or Cambria; 10, 11, or 12 pt. font sizes
 - Spreadsheet or Table Data Figures, Notes, and Titles: Times New Roman, Arial, Calibri, or Cambria; 10, 11, or 12 pt. font sizes
 - Graphics (such as pictures, models, charts, and graphs): Times New Roman, Arial, Calibri, or Cambria; 10, 11, or 12 pt. font sizes
- Margins: One inch
- Indentation/Tabs: Applicants' discretion
- Page Orientation: Portrait; exception: landscape may be used for spreadsheets and tables
- Maximum number of pages, not including cover sheet and supplemental information, such as: lists of project partners/subrecipients, disaster-vulnerable communities; letters of support; Memorandums of Understanding; budget spreadsheet; etc. (see the Project Narrative below for the maximum number of pages for each section)
- Graphics (e.g., pictures, models, charts, and graphs) will be accepted but are not required
- Primary font color will be black; however, other colors such as red and blue may be used for emphasis as appropriate
- Bold or italicized font may be used but is not required
- Spreadsheet or table format is acceptable where appropriate (e.g., timelines and matrices) but not mandatory



FEMA will not review or consider for funding any application that does not conform to the above specifications.

Required Application Contents

Applicants must present the contents of the application using the following arrangement.

Applications must not include any classified information and should not include any Law Enforcement Sensitive information.

FEMA will not consider any letters of endorsement or support submitted separately from an application. If statements of endorsement or support testimony are provided, they must be included in the Project Narrative.

Project Narrative Template (PDF)

13. Appendix C: Budget Detail Worksheet and Budget Narrative Template

The Budget Detail Worksheet Template may be used as a guide to assist applicants in the preparation of their Budget Detail Worksheet and Budget Narrative. Applicants may submit the Budget Detail Worksheet and Budget Narrative using this template or in the format of their choosing (plain sheets, spreadsheets, independently created forms, or a variation of this form). However, applicants must provide all the requested information identified in the general instructions for the worksheet and budget narrative, as well as the instructions for each section, and categorize it by activity and allowable cost.

The purpose of the Budget Narrative is to provide a detailed description of the budget found in the SF-424A and the Budget Detail Worksheet. The budget narrative must include a detailed discussion of how RCPGP funds will be used. The Budget Narrative should 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 Budget Worksheet.



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General Instructions

- Populate the tables to identify and itemize the costs to implement the proposed project.
- List and describe all activities and associated costs required to implement the project.
- Funds must be aligned to allowable cost categories in the Application for Federal Assistance SF-424a form and those cost categories which are allowable in the FY 2025 RCPGP (e.g., personnel, fringe benefits, travel, supplies, contractual, other direct costs and indirect costs) within each of the four Solution Areas: (1) Planning, (2) Organization, (3) Training, and (4) Exercises.
- Equipment, construction, renovation, maintenance, and sustainment costs are not allowed for FY 2025 RCPGP funding.
- The Budget Narrative should include a description and justification of costs for each item and should align with the Budget portion of the Project Narrative. A budget narrative should be completed for each cost category of the budget.

Cost categories and definitions are listed below:

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 Budget Detail Worksheet and the Budget Narrative.

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 RCPGP 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 outof-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 RCPGP award). Travel costs identified in this section are for employees of the applicants/recipients 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).

Supplies: Include all tangible personal property other than those described in the definition of "equipment" as defined by 2 C.F.R. § 200.1. Supplies are also defined in 2 C.F.R. § 200.1. The budget detail should identify categories of supplies to be procured for RCPGP purposes only (e.g., for gap analysis only) 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 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 Budget Detail Worksheet. As noted in the Section D.12 "Funding Restrictions and Allowable Costs," allowable supplies are limited to costs that support gap identification, planning, training, and exercise activities.

Contractual: Identify each proposed contract related to RCPGP 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 applicants, in the form of a procurement relationship. Leased or rented goods (equipment or supplies) for RCPGP purposes should be included in the "Other" category. The applicants should list the proposed contract activities along with a brief description of the scope of RCPGP 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).



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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 RCPGP 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 RCPGP purposes that may be in this category include the following: M&A, insurance, rental/lease of equipment or supplies, equipment service or maintenance contracts, printing, or photocopying rental, etc.

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 recipients 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. Not all applicants are required to have a current negotiated indirect cost rate agreement. Those that are required to have a negotiated indirect cost rate (e.g., fixed, predetermined, final, or provision) must submit their negotiated indirect cost agreement at the time of application. Applicants that are not required by 2 C.F.R. Part 200 to have a negotiated indirect cost rate agreement but are required to develop an indirect cost rate proposal must provide a copy of their proposal at the time of application. Applicants who do not have a current negotiated indirect cost rate agreement (including a provisional rate) and wish to charge the de minimis rate must reach out to the Grants Management Specialist or other relevant FEMA position for further instructions.

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.

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.

Budget Detail Worksheet (PDF)

