

The Department of Homeland Security (DHS)

Notice of Funding Opportunity (NOFO)

Fiscal Year 2025 Next Generation Warning System Grant Program

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

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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 Next Generation Warning System Grant Program
C. Announcement Type	Initial
D. Funding Opportunity Number	DHS-25-IPAWS-138-00-99
E. Assistance Listing Number	97.138
F. Expected Total Funding	\$40 million
G. Anticipated Number of Awards	5 awards

H. Expected Award Range	\$8,000,000.00
I. Projected Application Start Date	08/06/2025 1:00 p.m. Eastern Time (ET)
J. Projected Application End Date	08/15/2025 5:00 p.m. Eastern Time (ET)
K. Anticipated Funding Selection Date	09/20/2025
L. Anticipated Award Date	No later than September 29, 2025
M. Projected Period of Performance Start Date	10/01/2025
N. Projected Period of Performance End Date	09/30/2028
O. Executive Summary	This grant will fund projects to identify capability gaps and implement solutions for alert and warning to deliver timely public warning and emergency information and to protect critical infrastructure. There are rapid changes in technology, cybersecurity threats, and public preferences for consuming content, recipients will work with the Federal Emergency Management Agency (FEMA) to explore currently available, flexible, innovative, and forward-looking capabilities to disseminate emergency alerts and warnings across existing and new distribution pathways, including streaming services, sirens, giant-voice systems, satellites, internet-connected devices, and other solutions.
P. Agency Contact	<p>a. <i>Program Office Contact</i> Name: Office of National Continuity Programs Email Address: fema-ipaws-ngwsgp@fema.dhs.gov Business Phone: (202) 646-2500 Business Hours: 9:00 a.m. – 5:00 p.m.</p> <p>b. <i>FEMA Grants News</i> This channel provides general information on all FEMA grant programs and maintains a comprehensive database containing key personnel contact information at the federal, state, and local levels. FEMA Grants News Team is reachable at fema-grants-news@fema.dhs.gov OR (800) 368-6498, Monday through Friday, 9:00 AM – 5:00 PM ET.</p>

	<p>c. <i>Grant Programs Directorate (GPD) Award Administration Division</i> GPD’s Award Administration Division (AAD) provides support regarding financial matters and budgetary technical assistance. AAD can be contacted at ASK-GMD@fema.dhs.gov.</p> <p>d. <i>FEMA Regional Offices</i> FEMA Regional Offices also may provide fiscal support, including pre- and post-award administration and technical assistance. FEMA Regional Office contact information is available at https://www.fema.gov/fema-regional-contacts.</p> <p>e. <i>Civil Rights</i> Consistent with Executive Order 14173, Ending Illegal Discrimination & Restoring Merit-Based Opportunity, the FEMA Office of Civil Rights is responsible for ensuring compliance with and enforcement of federal civil rights obligations in connection with programs and services conducted by FEMA. They are reachable at FEMA-CivilRightsOffice@fema.dhs.gov.</p> <p>f. <i>Environmental Planning and Historic Preservation</i> The FEMA Office of Environmental Planning and Historic Planning (OEHP) provides guidance and information about the EHP review process to FEMA programs and recipients and subrecipients. Send any inquiries regarding compliance for FEMA grant projects under this NOFO to FEMA-OEHP-NOFOQuestions@fema.dhs.gov.</p> <p>g. <i>Payment and Reporting System</i> FEMA uses the Payment and Reporting System (PARS) for financial reporting, invoicing, and tracking payments. The Direct Deposit/Electronic Funds Transfer (DD/EFT) method of payment is used for recipients. For any questions about the system, contact the Customer Service Center at (866) 927-5646 or ask-GMD@fema.dhs.gov.</p> <p>h. <i>FEMA GO</i> FEMA uses the Direct Deposit/Electronic Funds Transfer (DD/EFT) method of payment to recipients. Payment requests are submitted through FEMA GO.</p> <p>i. <i>FEMA Preparedness Toolkit</i> The FEMA Preparedness Toolkit (PrepToolkit) provides access to tools and resources needed to implement the National Preparedness System and provide a collaborative space for communities completing the Unified Reporting Tool (URT). Recipients complete and submit their Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR), and other required</p>
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	assessments using the PrepToolkit. For assistance, contact support@preptoolkit.fema.dhs.gov .
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2. Eligibility

A. Eligible Entities/Entity Types	<p>Only the following entities or entity types are eligible to apply.</p> <p>a. <i>Applicants</i> States or Indian Tribes as defined in 2 CFR 200.1</p> <p>b. <i>Subapplicants</i> Subapplicants and subawards are allowed.</p> <p>Subapplicants should not have foreign nationals or noncitizens included. If a subapplicant has foreign nationals, they must be properly vetted and must adhere to all government statutes, policies, and procedures including “staff American, stay in America” and security requirements.</p>
B. Project Type Eligibility	<p>a. <i>Unallowable Project Types</i> Grant funds may NOT be used for purchases and services that are not directly related to advancing public alert and warning capabilities.</p> <p>b. <i>Allowable Project Types</i> The NGWSGP will support states, territories, and tribal nations in enhancing emergency alerting and warning capabilities.</p> <p>Project activities are limited to the following:</p> <ol style="list-style-type: none"> 1. Installation of IPAWS-compatible sirens and/or “giant-voice systems; 2. Coordination with the National Oceanic and Atmospheric Administration to enhance signals and availability for National Oceanic and Atmospheric Administration Weather Radios; 3. Integration and deployment of emergency alert datacasting technology; 4. Deployment of systems and technologies that enable the dissemination of advanced visual and audio alerts, such as to digital billboards, signage, and kiosks; 5. Integration of IPAWS alerts in internet of things (IoT) devices; 6. Integration of satellite-based alert and warning technologies, automated message origination and distribution capabilities, and other emerging capabilities. For example, jurisdictions could incorporate advanced warning lexicons informed by

	<p>behavioral science for more timely and effective public warning.</p> <ol style="list-style-type: none"> 7. Development of alert and warning state and local field testing, training, and exercise programming in collaboration with FEMA and federal, state, and local alert and warning partners. 8. Deploy capabilities to increase alert and warning coverage to rural areas and other locations across the state with limited communications access.
C. Requirements for Personnel, Partners, and Other Parties	<p>Subapplicants should not have foreign nationals or noncitizens included. If a subapplicant has foreign nationals, they must be properly vetted and must adhere to all government statutes, policies, and procedures including “staff American, stay in America” and security requirements.</p> <p>Subapplicants/subrecipients must submit short bios and resumes. This should include the type of entity, organizational leadership, and board members along with the both the names and addresses of the individuals. Resumes are subject to approval.</p>
D. Maximum Number of Applications	<p>The maximum number of applications that can be submitted is:</p> <ol style="list-style-type: none"> 1. One application per state, tribal, or territorial emergency management agency
E. Additional Restrictions	<p>Applicants and subapplicants are required to certify their compliance with federal statutes, DHS directives, policies, and procedures.</p>
F. References for Eligibility Factors within the NOFO	<p>Please see the following references provided below:</p> <ol style="list-style-type: none"> 1. “Responsiveness Review Criteria” subsection 2. “Financial Integrity Criteria” subsection 3. “Supplemental Financial Integrity Criteria and Review” subsection 4. FEMA may/will request financial information such as Employer Identification Number (EIN) and bank information as part of the potential award selection. This will apply to everyone prospered, including subrecipients.
G. Cost Sharing Requirement	<p>There is no cost share requirement.</p>
H. Cost Share Description, Type and Restrictions	<p>Not applicable</p>
I. Cost Sharing Calculation Example	<p>Not applicable</p>
J. Required information for verifying Cost Share	<p>Not applicable</p>

3. Program Description

A. Background, Program Purpose, and Program History

Our nation's emergency preparedness depends on having in place a secure and effective system for warning and informing the public of impending natural and man-made disasters. FEMA's Integrated Public Alert & Warning System (IPAWS) is the national system for local alerting that provides authenticated emergency and life-saving information to the public. Local radio and television stations, along with cable television, wireless carrier, direct broadcast satellite, other distribution providers and pathways disseminate the public safety messages they receive from IPAWS.

The Integrated Public Alert and Warning System Modernization Act of 2015 (P.L. 114-143) charged FEMA with upgrading and reinforcing the nation's public alert and warning system to withstand disruptive events and adapt to advancements in technology and methods of communication. This grant supports projects that aid in creating and maintaining a resilient public alert and warning system that provides timely and effective warnings. The IPAWS public alert and warning system is built on the Common Alerting Protocol standard (CAP) that permits a single CAP compatible message to activate multiple compliant warning systems.

The Next Generation Warning System (NGWS) will help support a reliable, resilient, and consistent capability for local, state, territorial, tribal, and federal public safety officials to deliver timely public warning and emergency information.

This grant will identify capability gaps and implement solutions for alert and warning to deliver timely warning and emergency information to the public and to protect critical infrastructure. There are rapid changes in technology, cybersecurity threats, and public preferences for consuming content, recipients will work with the Federal Emergency Management Agency (FEMA) to explore available, flexible, innovative, and forward-looking capabilities to disseminate emergency alerts and warnings across existing and new distribution pathways, including streaming services, sirens, giant-voice systems, satellites, internet-connected devices, and other solutions.

The recipient and the subrecipients shall comply with applicable Federal Communications Commission rules, includes, 47 Code of Federal Regulations Part 11, FEMA IPAWS best-practices, and telecommunications prohibitions set forth in Section 889 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019.

B. Goals and Objectives

Goal: The goal of this grant is to enhance alert and warning capabilities and improve resiliency of emergency alert and warning systems through effective services, solutions, and technology to improve the timely delivery of public safety information. The grant will explore and embrace currently available and emerging technology with audio and visual capabilities across all platforms to enable interactive and actionable emergency communications to the public.

Objectives: In coordination with the FEMA Integrated Public Alert and Warning System (IPAWS) Division, the grant recipients will pursue the following objectives:

1. Integrate effective, reliable, available, and timely alert and warning capabilities to enhance public emergency communications;
2. Test and deploy proven common-sense tools, pathways, and technologies that support advanced visual and audio alerts; and
3. Coordinate and execute whole-community public warning field training, testing, exercise, and evaluation in collaboration with IPAWS, federal, state, local, tribal, and private sector partners, including broadcasters and wireless carriers, to support the development of alert and warning governance, policies, plans, and procedures while improving cross-jurisdictional coordination before, during, and after incidents.

C. Program Rationale

The NGWS Grant Program makes federal funds available to explore available, flexible, innovative, and forward-looking capabilities to disseminate emergency alerts and warnings across existing and new distribution pathways and to fill gaps in current emergency alert and warning capabilities. The goals of the NGWSP align with and support the FY23 DHS Quadrennial Homeland Security Review (QHSR).

D. Federal Assistance Type

Cooperative Agreement

This award will provide rapid support to the awardees to help improve public safety in future disasters while enabling FEMA and the awardees to learn from practical application of proven emergency technology solutions, and methods that can inform future IPAWS development and support across the country. FEMA's involvement in selecting projects and evaluating successful performance is critical in helping FEMA to determine whether new technologies or approaches can be effectively applied to similar needs across the country and to make any necessary adjustments to national alerting policies, processes, or infrastructure.

E. Performance Measures and Targets

Performance measures for this award are:

1. Number of IPAWS-compatible sirens or "giant-voice" systems installed, with an emphasis on rural, tribal, and other areas with limited communications;
2. Population covered by newly integrated systems and technologies;
3. Number of new capabilities evaluated and deployed, with documented assessments of their potential value and feasibility to support emergency alerting and warning;

4. Number of public alert and warning tests and/or exercises;
5. Number of state and local public safety officials trained in alert and warning technology and capabilities;
6. The number of projects initiated and the percentage of projects that are on-track based on their individual milestone schedules; and
7. Percentage of on-time accomplishments of the overall milestone schedule below.

In addition to the above performance metrics, the awardees must meet certain award milestones.

- Within 90 days of receiving the award, each recipient must identify high-priority alert and warning capability gaps.
- By no later than December 31, 2025, each recipient identifies additional alert and warning capability gaps and develop a comprehensive plan to close those gaps, particularly in rural, tribal, and communities that lack communications infrastructure.
- By no later than June 1, 2026, each recipient must execute coordinated regional alert and warning test(s) for capabilities that have been deployed to date, The recipient must evaluate findings and share the results no later than 60 days after the test(s) are performed.
- By no later than February 28, 2027, each recipient must have executed at least 50% of their plan to close the capability gaps identified and share a report on enhancements to alert and warning through technology adoption, training, testing, and exercise.
- By no later than June 15, 2028, each recipient must have executed 100% of their plan to close the capability gaps identified and share a report on enhancements to alert and warning through technology adoption, training, testing, and exercise.
- By no later than the end of the period of performance, each recipient must submit a report sharing insights and lessons learned from the development and implementation of innovative, forward-looking capabilities to support effective alert and warning and identify potential future deployments to other states.

F. Program-Specific Unallowable Costs

This applies to the recipients and any potential subapplicants. Grant funds may NOT be used for purchases and services that are not directly related to advancing public alert and warning capabilities. The award recipient and potential subapplicants must provide procurement and funds management plans for FEMA approval.

G. General Funding Requirements

Costs charged to federal awards (including federal and non-federal cost share funds) must comply with applicable statutes, rules and regulations, policies, this NOFO, and the terms and conditions of the federal award. This includes, among other requirements, that costs must be

incurred, and products and services must be delivered within the budget period. [2 C.F.R. § 200.403\(h\)](#).

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

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

H. Indirect Costs (Facilities and Administrative Costs)

Indirect costs are NOT allowed.

I. Management and Administration (M&A) Costs

M&A costs are allowed. M&A costs are activities directly related to implementing the award. FEMA will allow recipients to use up to 5% of the amount of the award for their M&A and sub recipients may use up to 5% of the amount they receive for M&A. Funding levels for these costs must be negotiated on a per-project basis with the appropriate awarding office and should include an itemized listing of specific costs associated with M&A.

M&A costs include direct charges to the grant related to the administration aspects of implementing the award, such as salaries and benefits of human resources, administrative or finance personnel who support the execution of the grant but are not completing specific project activities.

Costs such as travel, meeting-related expenses, and salaries in direct support of the administration of the award are also examples of typically allowable M&A costs. Other M&A costs might include general operating costs when direct billed. However, M&A costs are not allowable as direct charges to the award when these costs are included in a recipient's negotiated indirect cost rate agreement.

Certain administrative costs are not considered to be M&A costs and are not subject to the M&A cap of 5% when those costs are directly related to a specific award activity.

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

J. Pre-Award Costs

Pre-award costs are not allowed.

K. Beneficiary Eligibility

The public may be third-party beneficiaries of the program if subapplicants purchase and distribute consumer devices that can receive emergency alerts (e.g., radios and other devices). The subrecipient assesses the needs of their communities and submits an application stating how the devices would benefit their communities.

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

L. Participant Eligibility

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

M. Authorizing Authority

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

The NGWSGP does not require nor will staff review pre-applications, letters of intent, and whitepapers.

B. Application Content and Format

There are no content or format requirements.

C. Application Components

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

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

D. Program-Specific Required Documents and Information

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

- **Work Plan Narrative.** A summary (narrative) of an applicant's Work Plan for the grant funding that identifies the proposed Allowable Activities, tasks, schedule, deliverables, and project management strategy for effectively leveraging the grant, if awarded, to achieve the stated goals of NGWS. The narrative should be informed by the review criteria described in Section 7, B. Application Criteria.
- **Budget.** The applicant must provide a budget for the funds requested.
- **Master Schedule/Deliverable Table.** This document will combine a schedule of planned activities with milestones and expected dates for completion, along with their associated deliverables (e.g., people trained, publications distributed, conferences/workshops/drills held, policies made, website improvements, etc.)
- **Competitive Subaward Process Description.** If applicable, a description, including a planned schedule and evaluation criteria, of how the awardee plans to solicit and review applicants and issue subawards with funding focused on the areas of greatest need and greatest likely benefit to communities
- **Milestone Schedule.** How the recipient plans to manage approval and distribution of funds over the period of performance and meet all milestones in Section 3.E.
- **Overall approach for managing the purchase and redistribution of consumer devices that can receive emergency alerts, if the applicant intends to use the grant to procure such devices.** The applicant shall describe how they intend to evaluate subaward applications

that include consumer receivers. FEMA understands that innovative uses and applications may be proposed by subapplicants, so this section should describe the general evaluation approach rather than trying to account for all approaches for the use of consumer receivers. Transparency and frequent program reporting helps FEMA assess performance of the subaward process and of subrecipients effective use of funds.

E. Post-Application Requirements for Successful Applicants

There are no post-application requirements.

5. Submission Requirements and Deadlines

A. Address to Request Application Package

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

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

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

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

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

How to Register to Apply:

General Instructions:

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

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

Organizations must have a UEI number, EIN, and an active SAM registration.

Obtain a UEI Number:

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

Obtain Employer Identification Number:

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

Create a login.gov account:

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

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

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

For more information on the login.gov requirements for SAM registration, refer to <https://www.sam.gov/SAM/pages/public/loginFAQ.jsf>.

Register with SAM:

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

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

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

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

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

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

Google Chrome;

Mozilla Firefox;

Apple Safari; and

Microsoft Edge.

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

Submitting the Final Application:

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

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

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

B. Application Deadline

08/15/2025 5:00 p.m. Eastern Time (ET)

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 [Single Point of Contact \(SPOC\)](#) to comply with the state's process under Executive Order 12372.

7. Application Review Information

A. Threshold Criteria

FEMA conducts reviews of all applications received to compare them for duplication including the narrative statements and statistical data. Therefore, all elements of the narrative statements must be specific and unique to the applying entity, and all statistical data must be accurate. Applications with narrative statements that have substantial duplication of statements, sentences, or paragraphs to other submitted applications, or inaccurate data that may mislead reviewers may be disqualified. Discovery of falsification, fabrication, or plagiarism of other grant proposals will disqualify the application(s).

Note: FEMA evaluates each application on its merit, veracity, and accuracy to ascertain how the narrative statement(s) outlined within the application depicts the applicant's and their jurisdiction's uniqueness, their particular risks, and how selecting them over a similarly situated applicant advances the objectives of the NGWSGP.

B. Application Criteria

First, IPAWS will screen applicants for eligibility and compliance. An applicant that does not meet eligibility or application submission requirements will be removed from consideration

IPAWS will then evaluate remaining applications through a review process for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed investments. Applicants can score a maximum of 100 points in this evaluation process. IPAWS will evaluate and score each application based on the evaluation criteria outlined in the following criteria:

Vulnerability Addressed: 0-25 points

How does this project address critical vulnerabilities in alert and warning?

Information reviewed includes:

- Description of need based on presence or history of hazards
- Population threatened
- Critical infrastructure threatened

Capability Gap: 0-25 points

How significant is the existing capability gap that this project addresses?

- Description of gaps based on history of alert and warning efforts
- Gaps in current alert and warning system coverage
- Gaps in high-need areas with limited communications access or few sources of emergency information available, such as rural communities

Solution (Ability to Improve Alert and Warning): 0-25 points

How well does this project support the NGWS program goals and objectives?

- Alignment of solutions with NOFO goals
- Assessed appropriateness of solutions relative to the need

Cost, Complexity, and Implementation Management: 0-15 points

How confident can FEMA be that this project will be completed as planned?

- Confidence in successful and transparent implementation within the specified timeline
- Confidence in cost reasonableness relative to the scope of the solution

Learning Opportunities: 0-10 points

How will this project enhance capabilities and share lessons learned?

- Proposal of proven alert and warning capabilities or innovative solutions with focus on increased effectiveness
- Capability for the applicant, FEMA, and other stakeholders to share lessons learned

DHS/FEMA Headquarters (HQ) Grants Management Specialists will also conduct a financial review using the following criteria:

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

C. Financial Integrity Criteria

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

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

1. Financial stability.

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

D. Supplemental Financial Integrity Criteria and Review

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

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\(a\)\(2\)](#).

1. An applicant may review and comment on any information in the responsibility/qualification records available in SAM.gov.
2. Before making decisions in the risk review required by [2 C.F.R. § 200.206](#), FEMA will consider any comments by the applicant.

E. Reviewers and Reviewer Selection

FEMA Office of National Continuity Programs (ONCP) Integrated Public Alert and Warning System (IPAWS) program staff will review the recipient applications to ensure compliance with program eligibility criteria and the program priorities detailed in Section 3 in this notice.

Applications are also reviewed by qualified FEMA grants management staff to ensure compliance with grants management principles, such as administrative requirements and cost principles. If the applicant/application does not meet eligibility or submission requirements, they are removed from consideration.

F. Merit Review Process

FEMA ONCP IPAWS program staff will review the applications received against the criteria described in *7. Application Review Information* and assign scores based on those criteria. The scores will be used to inform final selection of award recipients, as well as to inform the funding amount granted.

G. Final Selection

Final selection is made by the IPAWS program staff and FEMA grants management staff.

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 applicant electronically via FEMA GO. Award packages include an Award Letter, Summary Award Memo, Agreement Articles, and

Obligating Document. An award package notification email is sent via the grant application system to the submitting AOR.

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

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

B. Pass-Through Requirements

There are no pass-through obligations for this award.

C. Note Regarding Pre-Award Costs

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

D. Obligation of Funds

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

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 the FY 2025 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

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

B. DHS Standard Terms and Conditions

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

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

C. Financial Reporting Requirements

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
Oct. 1 – Dec. 31	Jan. 30
Jan. 1 – March 31	April 30
April 1 – June 30	July 30
July 1 – Sept. 30	Oct. 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. The recipients will submit an informal, monthly progress reports to FEMA IPAWS. IPAWS and the awardees will review the level of detail for monthly reporting as needed.
2. A Performance Report must be submitted quarterly throughout the POP.
3. A Performance Report must include:
 - a. A narrative description of overall project(s) status in support of the priorities listed in this NOFO, particularly how the recipients implement solutions for alert and warning to deliver timely warning and emergency information to the public and to protect critical infrastructure;
 - b. A summary of overall program expenditures by budget line item such as Management and Administration and Direct Costs to subawards, technical assistance (if applicable), and training;
 - c. Brief descriptions of new subawards, including awardee, amount, and focus;
 - d. The number of consumer devices purchased and distributed (if applicable);
 - e. A high-level dashboard of in-progress projects that depicts status and risk of subawards with the project name, funding committed, funds drawn down to date, project status, and target subaward closeout date;
 - f. A description of any issues, risks, or other concerns;
 - g. A detailed report on progress against key schedule milestones; and
 - h. A summary of performance measures for this period and total for the program:
 - i. Number of IPAWS-compatible sirens or “giant-voice” systems installed, with an emphasis on rural, tribal, and other areas with limited communications;
 - ii. Population covered by newly integrated systems and technologies;
 - iii. Number of new capabilities evaluated and deployed, with documented assessments of their potential value and feasibility to support emergency alerting and warning;
 - iv. Number of public alert and warning tests and/or exercises;
 - v. Number of state and local public safety officials trained in alert and warning technology and capabilities;
 - vi. The number of projects initiated and the percentage of projects that are on-track based on their individual milestone schedules; and
 - vii. Percentage of on-time accomplishments of the overall milestone schedule provided in section 3.E, above.
4. The Progress Report must be submitted through FEMA GO.
5. Performance Report Due Dates

Reporting Period	Report Due Date
Oct. 1 – Dec. 31	Jan. 30
Jan. 1 – March 31	April 30
April 1 – June 30	July 30
July 1 – Sept. 30	Oct. 30

Recipients shall also facilitate a quarterly Integrated Program Review (IPR) meeting focusing on the content of the quarterly report. In these meetings, the recipient and FEMA will discuss progress, results, and insights gained, and they will jointly work to refine criteria for future subawards to focus funding more effectively on NGWSGP objectives and priorities. FEMA does not intend to conduct a detailed review of every subaward in these meetings, since the recipient is primarily responsible for managing and overseeing progress for specific projects. Detail should be sufficient to convey the success in allocating grant funding to areas of greatest value and in accordance with priorities, overall progress of projects, insights into specific areas of concern and risk, lessons learned and recommendations to improve the program.

E. Closeout Reporting Requirements

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

1. The final request for payment, if applicable.
2. The final FFR.
3. The final progress report detailing all accomplishments. 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 [2 C.F.R. § 200.344](#); 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 [2 C.F.R. § 200.344\(h\)-\(i\)](#). It is an activity of last resort, and if FEMA administratively closes an award, this may negatively impact a recipient's ability to obtain future funding.

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

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

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

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

This requirement is fully described in [2 C.F.R. §180.335](#).

Additionally, [2 C.F.R. § 180.350](#) requires recipients to provide immediate notice to FEMA at any time after entering a federal award if:

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

G. Reporting of Matters Related to Recipient Integrity and Performance

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

If the total value of all active federal grants, cooperative agreements, and procurement contracts for a recipient exceeds \$10,000,000 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 [2 C.F.R. § 200.337](#), DHS and its authorized representatives have the right of access to any records of the recipient or subrecipient pertinent to a Federal award to perform audits, site visits, and any other official use. The right also includes timely and reasonable access to the recipient's

or subrecipient's personnel for the purpose of interview and discussion related to such documents or the Federal award in general.

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

J. Program Evaluation

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

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

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

K. Additional Performance Reporting Requirements

L. Termination of Federal Award

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

2. Termination of the Federal Award by FEMA

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

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

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

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

- a. If the subrecipient fails to comply with the terms and conditions of the federal award.
- b. With the consent of the subrecipient, in which case the pass-through entity and the subrecipient must agree upon the termination conditions. These conditions include the effective date and, in the case of partial termination, the portion to be terminated.

- c. If the pass-through entity's award has been terminated the pass-through recipient will terminate its subawards.

4. Termination by the Recipient or Subrecipient

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

5. Impacts of Termination

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

6. Notification requirements

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

7. Opportunities to Object and Appeals

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

8. Effects of Suspension and Termination

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

M. Best Practices

While not a requirement in the DHS Standard Terms and Conditions, as a best practice: Entities receiving funds through this program should ensure that cybersecurity is integrated

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

N. Payment Information

Recipients will submit payment requests in FEMA GO for FY25 awards under this program.

Instructions to Grant Recipients Pursuing Payments

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

Processing and Payment Timeline

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

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

FEMA grants are not “major federal assistance programs.” As a result, payments to states for those grants are subject to the “default” rules of [31 C.F.R. part 205, subpart B](#).

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

Submission Process

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

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

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

O. Immigration Conditions

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

Standard Terms and Conditions, v. 3 (Apr. 18, 2025) are available at www.dhs.gov/publication/dhs-standard-terms-and-conditions.

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 [2 C.F.R. §§ 200.317-200.327](#). To assist with determining whether an action is a procurement or instead a subaward, please consult [2 C.F.R. § 200.331](#). For detailed guidance on the federal procurement standards, recipients and subrecipients should refer to various materials issued by FEMA’s Procurement Disaster Assistance Team (PDAT). Additional resources, including an upcoming trainings schedule can be found on the PDAT Website: <https://www.fema.gov/grants/procurement>.

Under [2 C.F.R. § 200.317](#) 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 [2 CFR §200.322](#), regarding domestic preferences for Procurements and [2 CFR§ 200.327](#) 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 CFR §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 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 pre-award 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 agents of 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 [Purchasing Resources and Support for State and Local Governments.pdf](#)

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

4. Procurement Documentation

Per [2 C.F.R. R§ 200.318\(i\)](#), local government and nonprofit recipients or subrecipients are required to maintain and retain records sufficient to detail the history of procurement covering at least the rationale for the procurement method, selection of contract type, contractor selection or rejection, and the basis for the contract price. States and Indian Tribes are reminded that in order for any cost to be allowable, it must be adequately documented per [2 CFR §200.403\(g\)](#).

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

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

c. Financial Assistance Programs for Infrastructure

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

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

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

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

2. Waivers

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

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

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

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

3. Definitions

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

d. *Mandatory Disclosures*

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

e. *Adaptive Support*

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

f. Record Retention

1. Record Retention Period

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

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

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

g. Actions to Address Noncompliance

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

In the case of any potential or actual noncompliance, FEMA may place special conditions on an award per [2 C.F.R. § 200.208](#) and [2 C.F.R. § 200.339](#). FEMA may place a hold on funds until the matter is corrected, or additional information is provided per [2 C.F.R. § 200.339](#), or it may

do both. Similar remedies for noncompliance with certain federal civil rights laws are authorized pursuant to [44 C.F.R. Part 7](#) and [44 C.F.R. Part 19](#) or other applicable regulations. If the noncompliance is not able to be corrected by imposing additional conditions or the recipient or subrecipient refuses to correct the matter, FEMA may take other remedies allowed under [2 C.F.R. § 200.339](#).

h. 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.