

**Commonwealth of Massachusetts  
Executive Office of Public Safety and Security  
Office of Grants and Research  
Notice of Availability of Grant Funds**



**Federal Fiscal Year 2025 Homeland Security Grant  
Program –State Share**

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**Office of Grants and Research  
Federal Fiscal Year 2024  
Homeland Security Grant Program  
Notice of Availability of Grant Funds - State Share**

**September 10, 2025**  
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## **Introduction**

The **Massachusetts Office of Grants and Research (OGR)** supports public safety through the dissemination of state and federal grants funds focused on criminal justice, traffic safety, law enforcement and homeland security initiatives. OGR is the State Administering Agency for federal funds distributed to Massachusetts from the Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA), Department of Justice (DOJ) and the National Highway Traffic Safety Administration (NHTSA). OGR manages more than \$279 million in state and federal grants that are distributed to state agencies, municipalities, nonprofit and tribal entities throughout the Commonwealth.

## **Eligible Applicants**

For the purpose of this Availability of Grant Funds (AGF), only **Massachusetts State Agencies** that support the Commonwealth's homeland security needs are eligible to apply. Due to limited funding, preference will be given to public safety agencies that have statewide jurisdiction and are responsible for addressing public safety needs throughout the Commonwealth.

**Municipalities, private entities and nonprofit organizations ARE NOT eligible to apply under this solicitation.**

## **Funding Availability**

OGR will be accepting State-Share Applications from eligible state entities for Federal Fiscal Year 2025 (FFY2025) Homeland Security Grant Program (HSGP) from the DHS/FEMA. Proposed funding allocations are an approximation and contingent upon the anticipated receipt of federal funds.

OGR anticipates that approximately **\$2 million will be made available for state agencies** to competitively solicit for the purpose of addressing homeland security needs.

## **Disclaimer**

Please be advised that OGR reserves the right to amend this opportunity and revise language included in this AGF if funding rules and regulations are amended by FEMA. The OGR reserves the right to cancel this opportunity if the Commonwealth is not awarded these federal funds or unable to comply with federal grant administrative regulations being required in order to accept this award. It is the responsibility of applicants to check our website regularly for any updates/revisions being made to this opportunity. All OGR award recommendations are also subject to FEMA approval.

## **Competitive Grant Process**

This is a competitive grant process. Therefore, it will be imperative for applicants to clearly outline the need for their proposed project and identify the capability gap(s) that will be filled and

the existing capability that will be sustained or enhanced through the proposed project. Additionally, the applicant must clearly explain how the project will support implementation of the State Homeland Security Strategy goals, reduce gaps and address priorities identified in the THIRA and SPR, and enhance the specific Mission Areas and Core Capabilities of the National Preparedness Goal. Proposed projects should be based on an identified gap and not at the prompting of a vendor that may potentially benefit from the awarding of a grant.

During the application period, OGR Program Coordinator Sarah Malloy will be available to provide specific guidance to individual applicants as needed and may be reached by email at [Sarah.A.Malloy@mass.gov](mailto:Sarah.A.Malloy@mass.gov).

Please note, the following projects are considered state priorities. As such, they will not be subject to this competitive process but will be required to submit an application and all required documentation. The narrative and financial itemization must align with fusion center improvement or sustainment needs, as outlined in the Fusion Center Performance Measures section of the Preparedness Grants Manual. Recipients can also refer to the [Fusion Centers | Homeland Security website](#) for more information.

Agency	Project	Funding
Department of State Police	Commonwealth Fusion Center	\$1,000,000
Department of State Police	Commonwealth Critical Infrastructure Program	\$200,000

Please note, the agency managing the non-competitive state-funded priorities are also eligible to submit additional projects through the competitive grant process.

## Overview and Purpose of the HSGP

The following is a brief overview of the FFY2025 HSGP (Assistance Listing Number 97.067) and specific guidance needed for entities applying for funds. The information included here does not provide complete details of the HSGP, such as allowable and unallowable activities, equipment or other costs. The applicant is responsible for ensuring that its proposed project fully complies with both federal and OGR guidance for the HSGP. Links to the federal guidelines for this program and other pertinent documents are provided within this document.

The HSGP plays an important role in the implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities essential to achieving the [National Preparedness Goal](#) of “A secure and resilient Nation.”

For FFY2025, the SAA is required to dedicate 10% of the Commonwealth’s HSGP federal award to projects aimed at supporting border crisis response and enforcement as part of the national priority areas.

Within the broader construct, the objective of the HSGP is to provide funding to prevent terrorism and other catastrophic events and to prepare the Nation for the threats and hazards that pose the greatest risk to the security of the United States. The HSGP is comprised of the two following categories:

### State Homeland Security Program (SHSP)

The goal of SHSP is to support statewide and state, local, tribal, and territorial (SLTT) governments in building, enhancing, and sustaining the capabilities needed to prevent, prepare

for, protect against, and respond to acts of terrorism. SHSP funding is intended to help SLTT agencies address capability gaps identified through the THIRA/SPR process, as well as prioritize resources toward high-impact security focus areas, known as NPAs.

## Urban Area Security Initiative (UASI)

The UASI program assists high-threat, high-density Urban Areas in efforts to build, sustain, and deliver the capabilities necessary to prevent, protect against, mitigate, respond to, and recover from acts of terrorism. Eligibility has been determined through an analysis of relative risk of terrorism faced by the 100 most populous Metropolitan Statistical Areas (MSA) in the United States, as outlined in the Homeland Security Act of 2002, as amended. Detailed information on MSAs is available from the U.S. Census Bureau at Metropolitan and Micropolitan ([census.gov](https://www.census.gov)).

### Key Dates

<b>AGF Posted</b>	<b>9/10/2025</b>
<b>Information Session Webinar</b> <a href="#"><u>Registration Link</u></a>	<b>9/22/2025 at 11:00am</b>
<b>Application Due Date</b>	<b>10/3/2025 by 4:00pm</b>
<b>OGR Award Announcements</b>	<b>Tentative: November/December 2025</b>

### Federal Priorities

Given the evolving threat landscape, DHS/FEMA continuously evaluates the national risk profile and sets priorities to help ensure appropriate allocation of scarce security dollars. Due to the unique threats that the nation faces in 2025, DHS/FEMA has determined that there are five national priorities which require that SAAs allocate at least 30% of their funds to one or more of the 5 priority areas. It is the responsibility of the OGR, serving as the SAA to ensure that the Commonwealth meets the minimum spending requirements through the projects selected for an award. The five priority areas are as follows:

- 1) Enhancing the protection of soft targets/crowded places (no minimum spend).
- 2) Supporting Homeland Security Task Forces and Fusion Centers (no minimum spend).
- 3) Enhancing cybersecurity (no minimum spend).
- 4) Enhancing election security (3% of allocation)
  - To address these priorities, each SAA must make at least one (1) investment that supports physical and/or cyber election security.
  - Proposed investments must meet or exceed the FY 2025 national priority percentage for election security (minimum 3%) and will be evaluated by DHS/FEMA for effectiveness and alignment with program goals.
  - To further strengthen election integrity, agencies must:
  - Prioritize compliance with the Voluntary Voting System Guidelines (VVSG) 2.0 established by the U.S. Election Assistance Commission.

- Complete testing through a Voting System Test Laboratory (VSTL) accredited by the Commission.
- Utilize the U.S. Citizenship and Immigration Services' Systematic Alien Verification Entitlements (SAVE) system to verify that anyone working at a polling place in any capacity is a U.S. citizen.
- Additional resources and information regarding election security are available through the Cybersecurity and Infrastructure Security Agency.

**5) Supporting Border Crisis Response and Enforcement** (at least 10% of allocation) State and local law enforcement agencies are essential partners in safeguarding national security and public safety. Pursuant to Executive Order 14159, Protecting the American People Against Invasion, it is the policy of the United States to enforce immigration laws against all inadmissible and removable aliens—particularly those who threaten the safety or security of the American people. This includes the efficient execution of these laws through lawful incentives and enhanced detention capabilities. This NPA supports efforts that align with this policy and promote cooperation between local and federal partners. Projects may include, but are not limited to:

- Participation in the DHS/ICE 287(g) program, allowing trained local officers to support ICE with immigration enforcement.
- Cooperation with ICE detainers and other jurisdictional responsibilities related to immigration enforcement.
- Supportive activities such as officer training, technology and information sharing, operational support, and community engagement

*As per the federal AGF, State and local law enforcement agencies are essential partners in safeguarding national security and public safety. Pursuant to **Executive Order 14159**, Protecting the American People Against Invasion, it is the policy of the United States to enforce immigration laws against all inadmissible and removable aliens—particularly those who threaten the safety or security of the American people. This includes the efficient execution of these laws through lawful incentives and enhanced detention capabilities.*

## State Priorities

Active Shooter/Hostile Event Response (ASHER) activities that are NFPA 3000 standard compliant. ASHER activities will ensure state, local, and other public safety partner operational coordination; operational communications; and multi-agency participation. ASHER projects should seek to improve or evaluate the relevant target capabilities and the associated critical tasks in accordance with NFPA 3000 and as identified in the U.S. Department of Justice's [Critical Incident Review: Active Shooter at Robb Elementary School](#) Observations and Recommendations on pages 402-408.

Projects aligned with the **Massachusetts Homeland Security Strategic Plan Goals** as listed below:

- G1:** Strengthen the Commonwealth's ability to receive, analyze, and share actionable intelligence and information on threats and hazards.
- G2:** Enhance the Commonwealth's capabilities to combat terrorism and violent extremism.
- G3:** Protect the Commonwealth's most critical infrastructure and key resources.
- G4:** Improve the Commonwealth's ability to prevent and respond to cyber-attacks.
- G5:** Protect the Commonwealth's schools, institutions of higher learning, large venues, and houses of worship from hostile threats and active shooters.

- G6:** Enhance the Commonwealth's emergency management capabilities to respond to and recover from the increasing severity of weather events.
- G7:** Improve the public health emergency preparedness for pandemics, biological weapons, and mass casualty incidents (MCIs), including Active Shooter and Hostile Event Response.
- G8:** Expand the Commonwealth's chemical, biological, radiological, nuclear, and explosives (CBRNE) preparedness and response capabilities.
- G9:** Expand individual, community, and private sector disaster preparedness.
- G10:** Improve interoperable communications and information sharing capabilities.

## **Effectiveness Criteria**

Consideration will be given to proposed projects that reduce vulnerabilities or address high priority threats as identified in the Commonwealth's latest THIRA and the latest SPR. Applicants should review these documents during the preparation of their applications. The THIRA and SPR are considered by OGR to be **For Official Use Only** and must be requested via email from [Sarah.A.Malloy@mass.gov](mailto:Sarah.A.Malloy@mass.gov).

While these state priorities and projects in these areas will receive preference, OGR recognizes that applicants will have additional priorities unique to their mission, and OGR will do its best to consider those needs as well.

Additionally, applicants should also review and consider the priorities identified in the [FFY 2025 HSGP NOFO](#), which emphasizes activities that align to the National Preparedness System. The National Preparedness System is utilized to build, sustain, and deliver core capabilities in order to achieve the [National Preparedness Goal](#) (the Goal). The Goal is to sustain "a secure and resilient nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to and recover from the threats and hazards that pose the greatest risk."

Please note, FEMA released the Second Edition for the Goal in September 2015, which includes one additional core capability, as well as expanded details and revised titles for the original core capabilities.

## **Application Submission to OGR**

Proposals must be prepared and submitted using the [OGR online Application form](#). Only this form may be used by applicants; proposals submitted in other formats will not be reviewed or considered for funding.

Additional documentation that helps support the need for the project may be submitted with the proposal. Examples of supporting documentation include, but are not limited to, an After-Action Report and Improvement Plan that identifies operational gaps and describes specific actions that can be used to address them, a Threat and Vulnerability Assessment, and a letter(s) of partnership support from a partnering agency or agencies.

**Note:** OGR, serving as the SAA, will be required to review and determine if the costs submitted by each agency are reasonable and cost effective, align with the statewide strategic plan, and ensure that funds are going to the most pressing needs of the Commonwealth. If OGR needs more information to support your project prior to submitting it to FEMA for final approval or for your organization to revise your Plan to repurpose funding, your OGR point of contact will contact you accordingly. Final award amounts will be based on OGR and/or FEMA's evaluation of the effectiveness of proposed investments and projects.

**Online Application Form must be submitted no later than 4:00 p.m. on October 3, 2025.**

## Completing the Application and Budget Worksheet

All applicants must use the [OGR Online Application form](#). Agencies may submit more than one project, but each project must be submitted as a separate application and projects must be ranked in priority order.

**All applicants must complete and submit the following items with their application:**

- Budget Excel Worksheet (Attachment B)
- Screen shot / print out from System for Award Management (SAM) that includes agency name, Unique Entity Identifier (UEI) and registration expiration date.
- OGR Sub-Grantee Risk Assessment form.
- Letter(s) of Partnership Support, if applicable.
- Indirect Cost (IDC) rate agreement, if negotiated.

## Unique Entity Identifier (UEI) and System for Award Management (SAM)

All applicants for this award must be registered in SAM before submitting its application, provide a valid UEI (formerly DUNS number) in its application, and **continue to maintain** an active SAM registration with current information while it has an active federal award or an application or plan under consideration.

OGR will not make a federal award to an applicant until the applicant has complied with all applicable UEI and SAM requirements and/or if an applicant has not fully complied with the requirements by the application submission due date. OGR will determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

## OGR Sub-Grantee Risk Assessment

Federal regulations contained in Title 2 CFR §200.331 require that OGR evaluate each applicant's subrecipient's risk of non-compliance with Federal statutes, regulations, and the terms and conditions of the sub-award for purposes of determining the appropriate subrecipient monitoring. **In order to comply, the OGR Sub-Grantee Risk Assessment Form is included within this AGF. All applicants are required to complete and submit the OGR Risk Assessment Form along with their application.** OGR will utilize the Risk Assessment Form through its review process to help us determine appropriate monitoring plans for sub-recipients. **Please note that the OGR Sub-Grantee Risk Assessment Form is used to evaluate compliance risk, not risks associated with threats or hazards.** OGR will utilize the Sub-Grantee Risk Assessment Form through its review process to help identify if additional monitoring plan(s) and/or special conditions are required.

## Increased Emergency Communications Guidance

It is required that emergency communication projects align to the Statewide Communication Interoperability Plan (SCIP) and coordination and consultation with the Statewide Interoperability Governing Body (SIGB) or Statewide Interoperability Executive Committee (SIEC). To request a copy of the current SCIP, please contact [MA.SWIC@mass.gov](mailto:MA.SWIC@mass.gov).

Sub-recipients will be required to test their emergency communications capabilities and procedures in conjunction with regularly planned exercises (separate/additional emergency communications exercises are not required) and submit an After-Action Report (AAR) within 90 days of exercise completion.



## Letter(s) of Partnership Support

Projects that require the support of another state agency or entity must include a letter of partnership support and/or commitment from the partnering agency. A letter of partnership support is specifically required if the proposed project is to conduct a full-scale exercise to evaluate an agency's current standard operating procedures (SOP), as well as a response agency partner's SOPs. To revise both SOPs, include a letter of partnership support regarding the partnering agency's commitment to the proposed project. If there are multiple partnering agencies, include letters of support from all partners. Please do not solicit or include letters of support from agencies or officials that are not directly participating in the project.

## Review Process

Eligible applications will be reviewed and scored by three peer reviewers. Reviewers are responsible for ensuring all stated AGF rules and regulations are adhered to such as application completeness, answering questions posed, **ensuring projects have a homeland security nexus**, etc. All interoperable communications or electronic information sharing projects will be reviewed and must be approved by the SIEC or a representative thereof prior to purchasing, per [Executive Order 493](#), if approved for funding.

In addition to the peer review process, other factors will be taken into consideration by the Executive Director of OGR and Secretary of Public Safety and Security when making final award decisions, including but not limited to ensuring first responder and public safety agency needs are being met, homeland security strategic priorities are being addressed, past performance of applicants, availability of state funds for projects and the like. The Executive Director of OGR and Secretary of Public Safety and Security have final approval of all award decisions.

## Evaluation Criteria

Proposals will be evaluated by peer reviewers based on the Evaluation Criteria listed below. It is important that proposals clearly and completely address these requirements.

- a. **Agency Information (5 points maximum)**
- b. **Project Description (25 points maximum):** Not to exceed three pages, the applicant must include the following items in this section:
  - Briefly describe your agency and any statewide authority related to addressing homeland security. For example, an agency may be charged with providing training for first responders, enforcement to protect the public throughout the Commonwealth, recovery, etc.
  - The applicant must present a clearly written description of the project(s) with a detailed project scope that meets the criteria of the FFY 2025 HSGP. This section **must clearly describe the need** for the project within the context of addressing identified goals or capability gaps.
  - Expected outcomes must be clearly described and measurable within the performance period.
  - Related initiatives within your organization (if applicable).
  - A brief narrative identifying how the project(s) will be sustained by the organization in the future.
  - A brief description of how this project(s) will be managed, including key roles and responsibilities, and identification of key personnel.
  - A usage plan for equipment and owners of the proposed assets to be procured (if applicable).
  - It is important for applicants to address **all** questions completely within this section. The narratives should be clearly written without typographical and grammatical errors.
- c. **HSGP State & National Priorities (10 points maximum):** A detailed description of how the proposed project(s) supports the HSGP State and National Priorities.



- d. **Mission Areas & Core Capabilities (10 points maximum):** Identification of Mission Areas and Core Capabilities that the proposed project(s) addresses as described in the National Preparedness Goal.
- e. **State THIRA/SPR (10 points maximum):** A detailed description of how the proposed project(s) will address capabilities and gaps identified in the latest Massachusetts THIRA/SPR.
- f. **Milestones (10 points maximum):** A detailed timeline that illustrates how the project(s) will be completed within the performance period, to ensure adequate goals and resources are in place for completion of the proposed project(s).
- g. **Budget Narrative & Budget Details (30 points maximum):** A brief narrative of what the proposed budget entails (including how the budget was determined and cost-effective), as well as an accurate budget breakdown by cost category, cost, and description of expenditure.

## Additional Application Guidance

### Specificity

To the extent applicable, follow the “Who, What, When, Where, Why, and How” approach.

- Who (specifically) will benefit from this proposal, and who will implement the project?
- What (specifically) is being proposed, and what will be the outcome? (Define the project and its scope.)
- When will the project begin and end?
- Where will any equipment be located and/or where will project activities be focused?
- Why is this project important? How was this determined?
- How will the project be implemented?

Please note that the questions above are provided as a general guide to assist applicants so that sufficient detail and specificity is included. For example, a proposal merely stating, “Two generators will be procured,” does not provide enough detail.

### Budget Section

This section should include costs that are reasonable, allocable, and allowable under the HSGP. Budgets should include both itemized and total costs. The information provided here must align with the Project Summary Section. It is incumbent on the applicant to verify allowable costs and the information prior to submitting the application. Allowable equipment information may be found in FEMA's [Authorized Equipment List \(AEL\)](#). Please note, equipment listed on the AEL does NOT guarantee that it will be approved for funding. Applicants must demonstrate a homeland security nexus to justify the request. Funding is NOT intended for general emergency management use.

### Allowable Costs

Allowable costs for this program generally fall into five main categories: planning, organization, equipment, training, and exercises (POETE). **All projects funded under the program must demonstrate a clear connection to building capabilities that prevent, prepare for, protect against, or respond to acts of terrorism.** Grant funds must be used to supplement existing funds and not replace (supplant) funds that have been appropriated for the same purpose.

Applicants may utilize up to **5%** of their request for **Management and Administrative** costs.

[Information Bulletin \(IB\) 485](#) includes the most up-to-date information on project selection considerations and allowable activities for LETPA investments and compliments [IB 473](#). Both IBs are applicable to the FY 2025 HSGP AGF. For comprehensive LETPA requirements, refer to the [Law Enforcement Terrorism Prevention Activities Resource Guide](#).

As stated above, in general, HSGP funds may be invested in the following cost categories:

### **Planning**

HSGP funds may be used for a range of emergency preparedness and management planning activities, including those associated with the development, review, and revision of the THIRA or SPR; continuity of operations plans; and other planning activities that support the National Preparedness Goal and place an emphasis on updating and maintaining a current Emergency Operations Plan (EOP) that conforms to FEMA's [Comprehensive Preparedness Guide 101: Developing and Maintaining Emergency Operations Plans](#).

Planning efforts can also include conducting risk and resilience assessments on increasingly connected cyber and physical systems – on which security depends – using the Cybersecurity and Infrastructure Security Agency (CISA) [Infrastructure Resilience Planning Framework](#) and CISA resources. Additionally, funds may be used for planning efforts related to state court cybersecurity, 911 call capabilities, alert and warning capabilities, and implementation of the REAL ID Act (Pub. L. No. 109-13).

### **Organizational**

These activities include: development of whole community partnerships through groups such as Citizen Corp Councils; Structures and mechanisms for information sharing between the public and private sector; Implementing models, programs, and workforce enhancement initiatives to address ideologically-inspired radicalization to violence in the homeland; tools, resources, and activities that facilitate shared situational awareness between the public and private sectors; operational support; utilization of standardized resource management concepts such as typing, inventorying, organizing, and tracking to facilitate the dispatch, deployment, and recovery of resources before, during, and after an incident; responding to an increase in the threat level under the National Terrorism Advisory System (NTAS) or needs resulting from a National Special Security Event; and paying salaries and benefits for personnel to serve as qualified intelligence analysts.

### **Management and Administration (M&A)**

Subrecipients may use up to 5% of their awarded funds for M&A expenses; however, the total amount retained cannot exceed 5% of their award funds. M&A charged to HSGP funding must be used to support the specific HSGP program. Management and administration costs are not overhead costs, but are necessary direct costs incurred in direct support of the federal award or as a consequence of it, such as travel, meeting-related expenses, and salaries of staff in direct support of the program.

### **Operational Overtime**

Overtime hours being charged against the HSGP award are only eligible for reimbursement for actual hours worked regardless of department policy or union contract rules. For example, an officer working one hour of overtime on a federally funded project awarded by OGR is prohibited from charging the grant award for 4 hours of overtime due to a union contract. A department that must allow for this, will need to cover the remaining 3 hours of overtime from their own state or local budget. Departments found violating this policy will be subject to immediate termination of a grant award and must return all misspent funds back to OGR. HSGP-funded projects that include operational overtime require additional criteria, including specifying which types of overtime are eligible. Also, aside from the National Terrorism Advisory System alters (which do not require pre-approval), operational overtime must be preapproved before an event. HSGP

funds may not be used to support the hiring of sworn public safety officers for purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities ([6 U.S.C. § 609\(b\)\(1\)\(A\)](#)).

## **Federal Procurement Standards**

Spending under HSGP must comply with all applicable federal and state procurement standards described in 2 CFR 200.317 through 200.326 and provided by OGR via a Subgrant Conditions Form at the time of contracting. Subrecipients must also follow their own documented procurement procedures which reflect applicable federal and state rules and regulations.

Following federal requirements does not exempt subrecipients from state or local requirements. In some instances, state and/or local procurement requirements may be more stringent than the federal procurement regulations. Subrecipients must ensure any actions taken satisfy federal and state requirements.

Per FEMA, applicants using funds for personnel costs may be required to submit short biographies and resumes. OGR will contact awardees if this is needed at the time of contracting.

Additionally, OGR reserves the right to suspend or terminate a contract for non-compliance with the applicable procurement regulations. OGR is required to have policies and procedures for integrity of funds. Subrecipients will be subject to additional reporting requirements and further budget breakdowns. Please contact OGR staff for guidance when necessary. For more terms and conditions, please see attached [DHS S Terms and Conditions | Homeland Security](#).

## **Equipment**

The allowable prevention, protection, mitigation, response, and recovery equipment categories for HSGP are listed on the [Authorized Equipment List \(AEL\)](#). Some equipment items require prior approval before the obligation or purchase of the items. Please reference the grant notes for each equipment item to ensure prior approval is not required.

Unless otherwise stated, equipment must meet all mandatory regulatory and/or DHS/FEMA adopted standards to be eligible for purchase using these funds. In addition, agencies will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment.

Emergency communications systems and equipment must meet the applicable SAFECOM Guidance and be coordinated with the Statewide Interoperable Coordinator (SWIC) to ensure interoperability and long-term compatibility. SAFECOM Guidance and additional information is available on DHS website: <https://www.dhs.gov/safecom>

## **Controlled Equipment**

Not all equipment that is considered controlled equipment is allowed under the HSGP. As noted in Section B of FEMA Policy 207-22-0002, [Prohibited or Controlled Equipment Under FEMA Awards](#), certain equipment is prohibited and is not allowable under HSGP. Grant funds under this program may not be used for the purchase of equipment not approved by DHS/FEMA and OGR. For example, the purchase of tracked armored vehicles, camouflage uniforms, weapons, and weapons accessories (including ammunition) are generally not allowed with HSGP funds. For some controlled equipment that is allowable under the HSGP, additional documentation, justifications, reviews, and approvals are required, including but not limited to proof of policies and procedures to safeguard individuals' privacy, civil rights, and civil liberties. Contact your Program Coordinator if you have questions concerning SHSP requirements for controlled equipment requests.

## Requirements for Small Unmanned Aircraft System

All requests to purchase Small Unmanned Aircraft Systems (sUAS) with FEMA grant funding must comply with FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA Awards, and also include a description of the policies and procedures in place to safeguard individuals' privacy, civil rights, and civil liberties of the jurisdiction that will purchase, take title to, or otherwise use the sUAS equipment. sUAS policies are not required at the time of application but must be received and approved by FEMA prior to obligating HSGP funds. All grant-funded procurements must be executed in a manner compliant with federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327. For recipients that use HSGP funds for sUAS, FEMA advises that there is a general privacy concern related to the use of this equipment if the data the devices collect is transmitted to servers not under the control of the operator. It has been reported that some manufacturers of sUAS encrypt data and send that data to servers outside the United States. The U.S. Department of Homeland Security's Privacy Office suggests the recipient fully explore data transmission and storage issues with vendors to reduce the possibility of data breaches. Additionally, the Joint Explanatory Statement (JES) accompanying the FY 2025 DHS Appropriations Act further requires recipients to certify they have reviewed the Industry Alert on Chinese Manufactured Unmanned Aircraft Systems, and completed a risk assessment that considers the proposed use of foreign made sUAS to ascertain potential risks (e.g., privacy, data breaches, cybersecurity, etc.) related to foreign made versus domestic sUAS.

## Acquisition and Use of Technology to Mitigate UAS (Counter-UAS)

The malicious use of unmanned aircraft systems (i.e., drones) poses safety and security risks to soft targets and crowded places. Detecting drones is an allowable use of funds under the HSGP in accordance with [Executive Order 14305](#), Restoring American Airspace Sovereignty, which allows the purchase of unmanned aircraft systems (UAS) or equipment or services for the detection, tracking, or identification of drones and drone signals, and FEMA Information Bulletin 530. Before purchasing and deploying these systems, as outlined in the Domestic Counter-UAS National Action Plan, recipients must:

- **Consult FEMA and Legal Experts:** Work with FEMA's Preparedness Officer and legal experts to ensure your policies and procedures comply with federal and state laws regarding surveillance and communication.
- **Develop Standard Operating Procedures (SOPs):** Establish clear guidelines to ensure operations are conducted in a manner consistent with First and Fourth Amendment protections, and other applicable provisions of federal law.
- **Provide Training and Certification:** Ensure personnel operating UAS systems are properly trained and certified, in accordance with FEMA and Federal Aviation Administration standards.

It is strongly recommended that, prior to the testing, acquisition, installation, or use of UAS detection and/or mitigation systems, entities seek the advice of counsel experienced with both federal and state criminal, surveillance, and communications laws. Entities should conduct their own legal and technical analysis of each UAS detection and/or mitigation system and should not rely solely on vendors' representations of the systems' legality or functionality. Please also see the DHS press release on this topic for further information: [Interagency Issues Advisory on Use of Technology to Detect and Mitigate Unmanned Aircraft Systems | Homeland Security](#).

## Training

Allowable training-related costs under HSGP include the establishment, support, conducting, and attendance of training specifically identified under HSGP and/or in conjunction with emergency preparedness training by other Federal agencies (e.g., HHS and DOT). Training

conducted using HSGP funds should address a performance gap identified through an Integrated Preparedness Plan (IPP) that is part of the Integrated Preparedness Cycle or other assessments (e.g., National Emergency Communications Plan NECP Goal Assessments) and contribute to building a capability that will be evaluated through a formal exercise. Any training or training gaps, including training related to under-represented diverse populations that may be more impacted by disasters, including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations, should be identified in an IPP and addressed in the state or Urban Area Integrated Preparedness Cycle. Recipients are encouraged to use existing training rather than developing new courses. When developing new courses, recipients are encouraged to apply the Analyze, Design, Develop, Implement and Evaluate (ADDIE) model of instructional design.

Applicants are also encouraged to utilize the National Training and Education Division (NTED) [National Preparedness Course Catalog](#). Trainings include programs or courses developed for and delivered by institutions and organizations funded by DHS/FEMA/NTED. This includes the Center for Domestic Preparedness (CDP); the Emergency Management Institute (EMI); and NTED's Training Partner Programs, including the Continuing Training Grants (CTG), the National Domestic Preparedness Consortium (NDPC), the Rural Domestic Preparedness Consortium (RDPC), and other partners.

The catalog features a wide range of course topics in multiple delivery modes to meet FEMA's mission scope as well as the increasing training needs of Federal, state, local, territorial, and tribal audiences. All courses have been approved through NTED's course review and approval process.

## **Exercises**

Exercises conducted with grant funding should be managed and conducted consistent with [Homeland Security Exercise and Evaluation Program \(HSEEP\)](#). HSEEP provides guidance for exercise design, development, conduct, evaluation, and improvement planning. Exercises should involve long-term vulnerability reduction, operational coordination and communications, and community resilience. All allowable costs must follow the accepted national and/or state accepted standards and any associated plans for the relevant discipline(s) and purpose must be approved by OGR.

Unauthorized exercise-related costs include:

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

Please be aware, the above list is not comprehensive but rather provides examples of costs that will not be covered. For further details on unallowable costs, please refer to the [FFY 2025 HSGP NOFO](#).

## **Maintenance**

The use of DHS/FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades and user fees is allowable, as described in [FEMA Policy FP 205-402-125-1](#) under all active and future grant awards, unless otherwise noted. Apart from maintenance plans purchased incidentally to the original purchase of the equipment, the period



covered by maintenance or warranty plan must not exceed the period of performance of the specific grant funds used to purchase the plan or warranty.

## **Construction and Renovation**

**Construction and renovation costs to achieve capability targets related to preventing, preparing for, protecting against, or responding to acts of terrorism are allowed under this program.** For construction and renovation costs to be allowed, they must be specifically approved by DHS/FEMA in writing prior to the use of any program funds. Limits on the total amount of grant funding that may be used for construction or renovation may apply.

All proposed construction and renovation activities must undergo an EHP review, including approval of the review from FEMA, prior to undertaking any action related to the project. Failure of a grant recipient to meet these requirements may jeopardize Federal funding. Please see the Preparedness Grants Manual for more information.

## **Environmental Planning and Historic Preservation (EHP) Compliance**

Compliance with EHP requirements is a condition of the use of DHS/FEMA funds. Failure to comply with EHP requirements prior to the expenditure of DHS/FEMA funds will result in denial of reimbursement of these funds. OGR will assist sub-recipients with EHP compliance procedures. OGR has also developed an EHP guidance document to assist sub-recipients with adhering to EHP requirements, which will be made available to all successful applicants. Federal EHP review and approval is required for:

- Projects that entail installation of equipment such as smart boards, cameras, antennas, and other equipment.
- Projects involving digging into or otherwise disturbing the ground, construction, or renovation of any building or site; and
- Many training and exercise activities.

If the proposed project will require EHP review and approval, please provide a description of the scope of work for which an EHP review is required. If you do not believe that your project requires EHP review and approval, please state why (for example: equipment is portable).

The EHP review entails completing an EHP Screening Form and providing details of the project involved. Depending on the complexity of the project, additional documentation and/or approvals from other agencies may be required.

FEMA EHP reviews may take anywhere between one week to several months depending on the level of complexity of the project and the initial completeness and thoroughness of the EHP Screening Form. Applicants must factor this review process into the project timelines.

Note that the guidance document is not a substitute for Federal EHP guidance. Federal EHP guidance must be reviewed by all sub-recipients. Sub-recipients are ultimately responsible for compliance with EHP requirements. Refer to FEMA Policy (FP) documents 108-023-1 and 108-024-4 for more information. These documents and additional information on how to [Request Environmental Planning and Historic Preservation Review](#) is available on OGR's website.

## **Massachusetts Historical Commission (MHC) and/or Local Historic Commission Review**

Some projects, such as renovations and/or additions to a historic or potentially historic building, or to structures within a historic district, may require an additional review by the Massachusetts Historical Commission (MHC) and/or a local historic commission. Examples of these types of projects include, but are not limited to:



- Mounting security cameras inside or outside of a building.
- Installing a physical access control system.
- Mounting and hard-wiring video display.
- Installing fencing or other barriers surrounding a building.

The review may be initiated through the submission of a [Project Notification Form \(PNF\)](#) to MHC. Additional information about the MHC review, including FAQs, is available on the [MHC's Review and Compliance](#) page. MHC will respond with an approval or denial of a PNF, or a request for additional information, within 30 days. Otherwise, the PNF is considered approved.

## Mission Areas and Core Capabilities

Prevention		Protection	Mitigation	Response	Recovery
Planning					
Public Information and Warning					
Operational Coordination					
Intelligence and Information Sharing		Community Resilience	Infrastructure Systems		
Interdiction and Disruption			Long-term Vulnerability Reduction  Risk and Disaster Resilience Assessment  Threats and Hazards Identification	Critical Transportation	Economic Recovery
Screening, Search, and Detection				Environmental Response/Health and Safety	Health and Social Services
Forensics and Attribution	Access Control and Identity Verification	Fatality Management Services		Housing	
	Cybersecurity	Fire Management and Suppression		Natural and Cultural Resources	
	Physical Protective Measures	Logistics and Supply Chain Management			
	Risk Management for Protection Programs and Activities	Mass Care Services			
	Supply Chain Integrity and Security	Mass Search and Rescue Operations			
		On-scene Security, Protection, and Law Enforcement			
		Operational Communications			
		Public Health, Healthcare, and Emergency Medical Services			
		Situational Assessment			