

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



**Federal Fiscal Year 2026 Homeland Security Grant
Program – State Share**

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**Office of Grants and Research
Federal Fiscal Year 2026
FFY26 Homeland Security Grant Program
Notice of Availability of Grant Funds - State Share**

Application Deadline: July 14, 2026

Introduction

The **Massachusetts Office of Grants and Research (OGR)** is the State Administering Agency (SAA) 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 \$300 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 2026 (FFY2026) 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. **Please note** this amount is an estimate and could be higher or lower, contingent upon the amount of funding received from FEMA and priorities of the Commonwealth.

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. 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. As this is a competitive process, OGR cannot respond to questions regarding the merits of a specific project.

Please note, the following projects are considered state priorities. As such, they will not be subject to this competitive process, nor will they impact the \$2 million in funding made available under this competition. However, agencies will be required to submit an application through this process to fund these projects and must comply with 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 FFY2026 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 FFY2026, 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 well as 3% towards election security 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 composed of the two following categories:

State Homeland Security Program (SHSP)

The goal of SHSP is to support 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

Key Task	Date
AGF Posted	6/26/2026
Application Due Date	7/14/2026 by 4:00pm
OGR Award Announcements	Tentative: October 2026

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 2026, 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 five 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 FFY 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)

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. 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.

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.

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 [FY26 Federal 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.”

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 along 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 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 federal program priorities, 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 July 14, 2026.

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 A)
- 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 always 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.

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 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 2026 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 these questions 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 2026 HSGP AGF. For comprehensive LETPA requirements, refer to the [Law Enforcement Terrorism Prevention Activities Resource Guide](#).

Please see Appendix B at the end of this AGF for a list of priority areas, core capabilities, and example project types. 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 (1) hour of overtime on a federally funded project awarded by OGR is prohibited from charging the grant award for four (4) hours of overtime due to a union contract. A department that must allow for this will need to cover the remaining three (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 and/or local 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 \(AEL\)](#), which was recently updated. The list now includes 22 categories because Counter-UAS equipment was added. 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. Applicants can review [SAFECOM Guidance](#) and additional information available on the DHS website.

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 HSGP 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 DHS 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 FFY2026 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 displays, and
- 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				
Screening, Search, and Detection				
Forensics and Attribution	Access Control and Identity Verification Cybersecurity Physical Protective Measures Risk Management for Protection Programs and Activities Supply Chain Integrity and Security	Long-term Vulnerability Reduction Risk and Disaster Resilience Assessment Threats and Hazards Identification	Critical Transportation Environmental Response/Health and Safety Fatality Management Services Fire Management and Suppression Logistics and Supply Chain Management Mass Care Services Mass Search and Rescue Operations On-scene Security, Protection, and Law Enforcement Operational Communications Public Health, Healthcare, and Emergency Medical Services Situational Assessment	Economic Recovery Health and Social Services Housing Natural and Cultural Resources

Appendix A: DHS Standard Terms and Conditions

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 federal award, unless a term and condition specifically indicates otherwise. The DHS Standard Terms and Conditions are available online and can be found at 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 2026 Department of Homeland Security Standard Terms and Conditions, with the following exceptions. The term titled “Communication and Cooperation with the Department of Homeland Security and Immigration Officials” and paragraph (2)(a)(ii) of the term titled “Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act” do not apply to any federal award under this funding opportunity.

Pursuant to the preliminary injunction order issued on November 21, 2025, in County of Santa Clara et al. v. Noem, et al., No. 25-cv-08330-WHO (N.D. Cal.), the following terms and conditions do not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect: (1) The DHS Standard Term and Condition titled " Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act "; and (2) the DHS Standard Term and Condition titled "All Executive Orders Related to Grants". If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, both terms will immediately become effective. As stated above, Paragraph (2)(a)(ii) of the DHS Standard Term and Condition titled “Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act” will not apply even if the preliminary injunction is stayed, vacated, or extinguished.

Pursuant to the preliminary injunction order issued on November 21, 2025, in City of Chicago et al. v. Noem, et al., No. 25-CV-12765 (N.D. Ill.), the following terms and conditions do not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect: (1) the DHS Standard Term and Condition titled " Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act"; and (2) the DHS Standard Term and Condition titled " All Executive Orders Related to Grants". If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, both terms will immediately become effective. As stated above, paragraph (2)(a)(ii) of the DHS Standard Term and Condition titled “Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act” will not apply even if the preliminary injunction is stayed, vacated, or extinguished.

Pursuant to the preliminary injunction order issued on October 31, 2025, in City of Seattle v. Trump, et al., No. 2:25-cv-01435-BJR (W.D. Wa.), the following terms and conditions do not apply to awards or subawards issued to any of the plaintiffs subject to the preliminary injunction order while the order remains in effect: the DHS Standard Term and Condition titled " Federal Anti-Discrimination Laws Material to the Government’s Payment Decisions Under the False Claims Act ". If the preliminary injunction is extended to cover additional plaintiffs, this provision will also not apply to any awards or subawards issued to those plaintiffs. If the preliminary injunction is stayed, vacated, or extinguished, the term will immediately become effective. As stated above, paragraph (2)(a)(ii) the DHS Standard Term and Condition titled “Federal Anti-Discrimination Laws Material to the

Government's Payment Decisions Under the False Claims Act" will not apply even if the preliminary injunction is stayed, vacated, or extinguished.

Note: 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 per 2 C.F.R. § 200.303(e).

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.

Program Evaluation

Title I of the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act), Pub. L. No. 115-435 (2019), 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 allowed and may not be charged to the federal award.

Immigration Conditions

Materiality of Pending Immigration Condition: An immigration term and condition, including those in the DHS Standard Terms and Conditions, may be material to the Department of Homeland Security's decision to make this grant award, and the Department of Homeland Security may take any remedy for noncompliance, including termination, if the state or territorial recipient or any local government subrecipient fails to comply with this term and condition. No final agency determination has been made as of the date of this publication.

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.

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 Environmental Planning and Historic Preservation (EHP) laws, Executive Orders, regulations, and policies.

Recipients and subrecipients propose projects with the potential to impact the environment or cultural resources, such as the modification or renovation of existing buildings, structures, and facilities, either new construction 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, and historic properties; 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, alternative courses of action, or both that may lessen impacts to those resources.

FEMA is sometimes required to consult with other regulatory agencies and the public 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, alternative courses of action, or both to lessen impacts to EHP resources and bring the project into EHP compliance. If a proposed project has been evaluated by another federal agency, FEMA may be able to streamline portions of the EHP review by adopting or supplementing previous analyses performed under the National Environmental Policy Act. If a proposed project has previously been reviewed by another federal agency, please provide those documents for FEMA's consideration.

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.

The EHP screening form is available at Environmental & Historic Preservation Grant Preparation Resources.

Procurement Compliance

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). The Procurement Under Grants Policy Guide (PUGPG) and additional resources can be found on the PDAT website at Procurement and Contracting.

When conducting procurement transactions under a federal award, states, Indian Tribes (Tribal Nations), the District of Columbia, U.S. territories, and their agencies must follow their own documented procurement policies and procedures as outlined in 2 C.F.R. § 200.317. They are also required to comply with rules for domestic preferences (2 C.F.R. § 200.322), the use of recovered materials (2 C.F.R. § 200.323), and ensure all necessary contract provisions are included (2 C.F.R. § 200.327). If these entities do not have documented procurement policies or procedures, they must follow the federal procurement rules listed in 2 C.F.R. §§ 200.318–200.327.

Note: Indian Tribes (Tribal Nations) are exempt from the recovered materials requirements in 2 C.F.R. § 200.323.

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. §§ 200.318–200.327.

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.

Threshold Increases Effective October 1, 2025

Effective October 1, 2025, the United States Office of Management and Budget increased the Federal micro-purchase threshold from \$10,000 to \$15,000 and the Federal simplified acquisition threshold from \$250,000 to \$350,000. These updated thresholds now apply to recipient and subrecipient activities under 2 C.F.R. Part 200, including procurements and budget approval requests executed on or after October 1, 2025, for all open financial assistance awards.

Procurement Standards: Competition and Conflict of Interest

All procurement transactions under a federal award must provide for full and open competition. To ensure compliance, recipients and subrecipients must avoid practices that restrict competition. Examples of restrictive practices include, but are not limited to:

- Placing unreasonable requirements on firms to qualify to do business;
- Requiring unnecessary experience or excessive bonding;
- Engaging in noncompetitive pricing practices between firms or affiliated companies;
- Awarding noncompetitive contracts to consultants on retainer;

- Specifying only a “brand name” product instead of allowing “an equal” product to be offered; and
- Taking arbitrary actions during the procurement process.

Real Conflict of Interest

Under 2 C.F.R. § 200.318(c)(1), local government and nonprofit recipients or subrecipients must maintain written standards of conduct to address conflicts of interest. Employees, officers, or agents involved in the selection, award, or administration of contracts are prohibited from participating if they have a real or apparent conflict of interest. A conflict arises when the individual, their immediate family, partner, or an organization they are affiliated with has a financial or other interest in, or stands to benefit from, a firm considered for a contract.

Additionally, officers, employees, and agents may not solicit or accept gratuities, favors, or anything of monetary value from contractors or subcontractors. However, recipients or subrecipients may establish standards for situations where the financial interest is not substantial, or the gift is an unsolicited item of nominal value. Violations of these standards must result in disciplinary actions as outlined in the recipient’s or subrecipient’s policies.

Organizational Conflict of Interest

Under 2 C.F.R. § 200.318(c)(2), recipients or subrecipients with a parent, affiliate, or subsidiary organization that is not a state, local, tribal, or territorial (SLTT) government must maintain written standards of conduct to address organizational conflicts of interest. An organizational conflict of interest occurs when a relationship with a parent company, affiliate, or subsidiary compromises, or appears to compromise, the recipient’s or subrecipient’s impartiality in conducting a procurement action.

Recipients or subrecipients must disclose any potential organizational conflicts of interest in writing to FEMA or the pass-through entity, as required by FEMA policy.

Contractors Drafting Requirements

Per 2 C.F.R. § 200.319(b), contractors that develop or draft specifications, statements of work, invitations for bids, or requests for proposals are prohibited from competing for those procurements. FEMA considers this an organizational conflict of interest and extends this restriction to contractors who assist recipients or subrecipients in developing grant applications, project plans, or budgets.

This prohibition also applies to former employees who worked on such activities while employed by the recipient or subrecipient. Unless the recipient or subrecipient solicits and awards a contract that explicitly includes both the development and execution of specifications (or similar elements), and the contract was procured in compliance with 2 C.F.R. §§ 200.317–200.327, federal funds cannot be used to pay the contractor to perform the work. This rule applies to all contracts funded with federal grant funds, including pre-award costs (e.g., grant writer fees) and post-award costs (e.g., grant management fees).

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 on General Services Administration programs, including multiple award schedules, for states, Indian Tribes (Tribal Nations), and local governments, and their instrumentalities, can be found in Purchasing Under a Federal Award.

Procurement Documentation

Per 2 C.F.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. These records must include, but are not limited to, 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 (Tribal Nations) 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.

Buy America Preference Requirements 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 project are produced in the United States.

Recipients and subrecipients provided funds under this program for an infrastructure project must comply with FEMA's implementation requirements of the Build America, Buy America Act, as detailed in FEMA's Buy America Preference Policy. 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.

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.

For more information about FEMA's implementation of the Buy America Preference, please visit FEMA's Buy America Preference webpage at Programs and Definitions: Build America, Buy America Act | FEMA.gov.

Waivers

When necessary, recipients (and subrecipients through their pass-through entity) may apply for a waiver from these requirements. A waiver of the domestic content procurement preference may be granted if FEMA determines that:

- Applying the domestic content procurement preference would be inconsistent with the public interest;

- 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.

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.

Mandatory Disclosures

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

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.

Record Retention

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 per 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.

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

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.

Audits

FEMA grant recipients are subject to audit oversight from multiple entities including the DHS Office of Inspector General (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.

Appendix B: Allowable Program Activities and Examples

Allowable Program Activities	SHSP	UASI
Allowable Planning Costs		
Developing hazard/threat-specific annexes	Y	Y
Developing and implementing homeland security support programs and adopting ongoing DHS/FEMA national initiatives	Y	Y
Developing related terrorism and other catastrophic event prevention activities	Y	Y
Developing and enhancing plans and protocols	Y	Y
Developing or conducting assessments	Y	Y
Hiring full- or part-time staff or contract/consultants to assist with planning, engagement, and volunteer management activities	Y	Y
Materials required to conduct planning, engagement, and volunteer management activities	Y	Y
Travel/per diem related to planning, engagement, and volunteer management activities	Y	Y
Overtime and backfill costs (in accordance with operational Cost Guidance)	Y	Y
Issuance of Western Hemisphere Travel Initiative-compliant Tribal identification cards	Y	N
Activities to achieve planning inclusive of people with disabilities and others with access and functional needs and limited English proficiency.	Y	Y

Allowable Program Activities	SHSP	UASI
Coordinating with Citizen Corps Councils for public information/education and development of volunteer programs	Y	Y
Coordinating with and material support to Citizen Corps Councils and local firehouses for the establishment, training and maintenance of CERTs	Y	Y
Updating governance structures and processes and plans for emergency communications	Y	Y
Developing and reviewing and revising of continuity of operations plans	Y	Y
Developing and reviewing and revising of the THIRA/SPR and continuity of operations plans	Y	Y
Allowable Organizational Activities Note: Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant		
Program management	Y	Y
Developing whole community partnerships	Y	Y
Structures and mechanisms for sharing information between the public and private sector	Y	Y
Implementing models, programs, and workforce enhancement initiatives	Y	Y
Tools, resources, and activities that facilitate shared situational awareness between the public and private sectors	Y	Y
Operational support	Y	Y
Utilizing standardized resource management concepts	Y	Y
Responding to an increase in the threat level under the National Terrorism Advisory System (NTAS), or needs resulting from a National Special Security Event	Y	Y
Reimbursement for select operational expenses associated with increased security measures at critical infrastructure sites incurred (up to 50% of the allocation)	Y	Y

Allowable Program Activities	SHSP	UASI
Overtime for information, investigative, and intelligence sharing activities (up to 50% of the allocation)	Y	Y
Hiring new staff positions/contractors/consultants for participation in information/intelligence analysis and sharing groups or fusion center activities (up to 50% of the allocation).	Y	Y
Hiring or maintaining staff positions/contractors/consultants at SLTT levels to deliver community preparedness training, resources and material to schools, community-based organizations, faith-based institutions and local businesses.	Y	Y
Hiring or maintaining staff positions/contractors/consultants to create, support and maintain CERT or Teen CERT	Y	Y
Cost of migrating online services to the ".gov" domain	Y	Y
Allowable Equipment Categories		
Personal Protective Equipment	Y	Y
Explosive Device Mitigation and Remediation Equipment	Y	Y
CBRNE Operational Search and Rescue Equipment	Y	Y
Information Technology	Y	Y
Cybersecurity Enhancement Equipment	Y	Y
Interoperable Communications Equipment	Y	Y
Detection	Y	Y
Decontamination	Y	Y
Medical countermeasures	Y	Y
Power (e.g., generators, batteries, power cells)	Y	Y
CBRNE Reference Materials	Y	Y
CBRNE Incident Response Vehicles	Y	Y
Terrorism Incident Prevention Equipment	Y	Y
Physical Security Enhancement Equipment	Y	Y

Allowable Program Activities	SHSP	UASI
Inspection and Screening Systems	Y	Y
Animal Care and Foreign Animal Disease	Y	Y
CBRNE Prevention and Response Watercraft	Y	Y
CBRNE Prevention and Response Unmanned Aircraft	Y	Y
CBRNE Aviation Equipment	Y	Y
CBRNE Logistical Support Equipment	Y	Y
Intervention Equipment (e.g., tactical entry, crime scene processing)	Y	Y
Critical emergency supplies	Y	Y
General use vehicle acquisition, lease, and rental	N	N
Specialized vehicle acquisition, lease, and rental	Y	Y
Other Authorized Equipment	Y	Y
Allowable Training Costs		
Overtime and backfill for emergency preparedness and response personnel attending DHS/FEMA-sponsored and approved training classes	Y	Y
Overtime and backfill expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA training	Y	Y
Training workshops and conferences	Y	Y
Activities to achieve training inclusive of people with disabilities and others with access and functional needs and limited English proficiency	Y	Y
Full- or part-time staff or contractors/consultants	Y	Y
Travel	Y	Y
Supplies	Y	Y
Instructor certification/re-certification	Y	Y
Coordination with Citizen Corps Councils and CERT in conducting	Y	Y

Allowable Program Activities	SHSP	UASI
training exercises		
Preparedness training for community preparedness initiatives and programs	Y	Y
Interoperable communications training	Y	Y
Activities to achieve planning inclusive of people with limited English proficiency	Y	Y
Immigration enforcement training	Y	Y
Allowable Exercise Related Costs		
Design, Develop, Conduct, and Evaluate an Exercise	Y	Y
Full- or part-time staff or contractors/consultants	Y	Y
Overtime and backfill costs, including expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA exercises	Y	Y
Implementation of Homeland Security Exercise and Evaluation Program (HSEEP)	Y	Y
Activities to achieve exercises inclusive of people with disabilities and others with access and functional needs	Y	Y
Travel	Y	Y
Supplies	Y	Y
Interoperable communications exercises	Y	Y
Activities to achieve planning inclusive of people with limited English proficiency	Y	Y
Allowable M&A Costs		
Hiring full- or part-time staff or contractors/consultants to assist with the management of the respective grant program, application requirements, and compliance with reporting and data collection requirements	Y	Y
Development of operating plans for information collection and processing necessary to respond to DHS/FEMA data calls	Y	Y

Allowable Program Activities	SHSP	UASI
Overtime and backfill costs	Y	Y
Travel	Y	Y
Meeting related expenses	Y	Y
Authorized office equipment	Y	Y
Recurring expenses such as those associated with cell phones and faxes during the period of performance of the grant program	Y	Y
Leasing or renting space for newly hired personnel during the period of performance of the grant program	Y	Y
Conducting activities related to evaluating project effectiveness for HSGP-funded projects	Y	Y
LETPA Costs		
Integration and interoperability of systems and data, such as computer aided dispatch (CAD) and record management systems (RMS), to facilitate the collection	Y	Y
Maturation, enhancement, and sustainment of designated state and major Urban Area fusion centers, including information sharing and analysis, threat recognition, terrorist interdiction, and intelligence analyst training and salaries (subject to certain conditions)	Y	Y
Regional counterterrorism training programs for small, medium, and large jurisdictions to exchange information and discuss the current threat environment, lessons learned, and best practices to help prevent, protect against, and mitigate acts of terrorism	Y	Y
Coordination of regional full-scale training exercises (federal, state, and local law enforcement participation) focused on terrorism-related events	Y	Y
Law enforcement Chemical, Biological, Radiological, Nuclear, and high yield Explosives detection and response capabilities, such as bomb detection/disposal capability development, sustainment, or enhancement, including canine teams, robotics platforms, and x-ray technology	Y	Y
Coordination between fusion centers and other operational analytic and investigative efforts	Y	Y
Allowable Program Activities		
Implementation, maintenance, and sustainment of the Nationwide Suspicious Activity Reporting Initiative	Y	Y
Implementation of the "If You See Something, Say Something SM " campaign	Y	Y
Increase physical security, through law enforcement personnel and other protective measures, by implementing preventive and protective measures at critical infrastructure locations	Y	Y

Priority Areas	Core Capabilities	Example Project Types
National Priorities		
Enhancing the Protection of Soft Targets/Crowded Places (Securing Public Gathering Locations)	<ul style="list-style-type: none"> ▪ Operational coordination ▪ Public information and warning ▪ Intelligence and information sharing ▪ Interdiction and disruption ▪ Screening, search, and detection ▪ Access control and identity verification ▪ Physical protective measures ▪ Risk management for protection programs and activities 	<ul style="list-style-type: none"> ▪ Operational overtime. For more information on operational overtime, see Appendix 2 of this NOFO. ▪ Physical security enhancements <ul style="list-style-type: none"> ○ Security cameras (closed-circuit television [CCTV]) ○ Security screening equipment for people and baggage ○ Lighting ○ Access controls ○ Fencing, gates, barriers, etc. ▪ UAS and detection technologies
Enhancing Cybersecurity	<ul style="list-style-type: none"> ▪ Cybersecurity ▪ Intelligence and information sharing ▪ Planning ▪ Public information and warning ▪ Operational coordination ▪ Screening, search, and detection ▪ Access control and identity verification ▪ Supply chain integrity and security ▪ Risk management for protection programs and activities ▪ Long-term vulnerability reduction ▪ Situational assessment ▪ Infrastructure systems ▪ Operational communications 	<ul style="list-style-type: none"> ▪ Cybersecurity risk assessments ▪ Migrating online services to the “.gov” internet domain ▪ Projects that address vulnerabilities identified in cybersecurity risk assessments <ul style="list-style-type: none"> ○ Improving cybersecurity of critical infrastructure to meet minimum levels identified by the Cybersecurity and Infrastructure Security Agency and the National Institute of Standards and Technology Cybersecurity Framework (Version 1.1) ○ Adoption of cybersecurity performance goals (CISA's Cross-Sector Cybersecurity Performance Goals) ▪ Cybersecurity training, planning, and exercises
Supporting Homeland Security Task Forces	<ul style="list-style-type: none"> ▪ Intelligence and information sharing 	<ul style="list-style-type: none"> ▪ Establishing or enhancing multi-agency Homeland Security Task Forces

Priority Areas	Core Capabilities	Example Project Types
and Fusion Centers	<ul style="list-style-type: none"> ▪ Interdiction and disruption ▪ Public information and warning ▪ Operational coordination ▪ Risk management for protection programs and activities 	<p>(HSTFs), including operational coordination centers</p> <ul style="list-style-type: none"> ▪ Enhancing capabilities and integration with local fusion centers ▪ Procuring technology or equipment to support surveillance, communications, and data analysis ▪ Developing standard operating procedures for information sharing, joint operations, and immigration enforcement coordination ▪ Personnel training, credentialing, and certification to improve interoperability and mission alignment ▪ Intelligence analysis, reporting, and suspicious activity monitoring ▪ Exercises and simulations focused on joint operations, intelligence sharing, or interdiction/disruption of criminal or smuggling networks ▪ Community engagement efforts to foster trust and encourage threat reporting ▪ Information sharing with all DHS components; fusion centers; other operational, investigative, and analytic entities; and other federal law enforcement and intelligence entities ▪ Cooperating with DHS and other entities in intelligence, threat recognition, assessment, analysis, and mitigation ▪ Identifying, assessing, and reporting of threats of violence ▪ Intelligence analysis training, planning, and exercises ▪ Coordinating the intake, triage, analysis, and reporting of tips/ leads and suspicious activity, to include coordination with the <u>Nationwide Suspicious Activity Reporting (SAR) Initiative (NSI)</u>

Priority Areas	Core Capabilities	Example Project Types
Enhancing Election Security	<ul style="list-style-type: none"> ▪ Cybersecurity ▪ Intelligence and information sharing ▪ Planning ▪ Long-term vulnerability reduction ▪ Situational assessment ▪ Infrastructure systems ▪ Operational coordination ▪ Community resilience 	<ul style="list-style-type: none"> ▪ Physical security planning and exercise support ▪ Physical/site security measures (e.g., locks, shatter-proof glass, alarms, access controls) ▪ General election security navigator support ▪ Cyber and general election security navigator support ▪ Cybersecurity risk assessments, training, and planning ▪ Projects that address vulnerabilities identified in cybersecurity risk assessments ▪ Iterative backups, encrypted backups, network segmentation, monitoring/scanning software, and endpoint protection ▪ Distributed Denial of Service (DDoS) protection ▪ Migrating online services to the “.gov” internet domain ▪ Public awareness and preparedness campaigns addressing election security and integrity measures ▪ Long-term vulnerability reduction and community resilience initiatives
Supporting Border Crisis Response and Enforcement	<ul style="list-style-type: none"> ▪ Training and awareness ▪ Community resilience ▪ Operational coordination ▪ Risk management for protection programs and activities 	<ul style="list-style-type: none"> ▪ Staffing support to expand 287(g) screening operations within correctional facilities ▪ Operational overtime costs directly tied to 287(g) screening, processing, and enforcement activities ▪ Training programs for state and local law enforcement officers in immigration law, civil rights and civil liberties protections, and 287(g) procedures ▪ Developing or enhancing information-sharing platforms between ICE and

Priority Areas	Core Capabilities	Example Project Types
		local agencies <ul style="list-style-type: none"> ▪ Procuring screening, detection, and communications technology to support immigration enforcement activities ▪ Establishing secure and dedicated communication networks with ICE Field Offices ▪ Conducting joint training exercises with ICE and local law enforcement to test operational coordination ▪ Supporting facilities upgrades, such as creating dedicated interview rooms and secure processing spaces ▪ Community engagement and public briefings to promote transparency and understanding of 287(g) operations and protections
Enduring Needs		
Planning	<ul style="list-style-type: none"> ▪ Planning ▪ Risk management for protection programs and activities ▪ Risk and disaster resilience assessment ▪ Threats and hazards identification ▪ Operational coordination ▪ Community resilience 	<ul style="list-style-type: none"> ▪ Development of: <ul style="list-style-type: none"> ○ Security Risk Management Plans ○ Threat Mitigation Plans ○ Continuity of Operations Plans ○ Response Plans ○ Vulnerability Assessments ▪ Efforts to strengthen governance integration between/among regional partners ▪ Joint training and planning with DHS officials and other entities designated by DHS ▪ Cybersecurity training and planning
Training and Awareness	<ul style="list-style-type: none"> ▪ Long-term vulnerability reduction ▪ Public information and warning ▪ Operational coordination ▪ Situational assessment ▪ Community resilience 	<ul style="list-style-type: none"> ▪ Active shooter training ▪ Intelligence analyst training ▪ SAR and terrorism indicators/behaviors training ▪ Security training for employees ▪ Public awareness/preparedness campaigns ▪ Cybersecurity training and planning

Priority Areas	Core Capabilities	Example Project Types
		<ul style="list-style-type: none"> ▪ Sharing and leveraging intelligence and information
Equipment and Capital Projects	<ul style="list-style-type: none"> ▪ Long-term vulnerability reduction ▪ Infrastructure systems ▪ Operational communications ▪ Interdiction and disruption ▪ Screening, search and detection ▪ Access control and identity verification ▪ Physical protective measures 	<ul style="list-style-type: none"> ▪ Protecting high-risk, high-consequence areas or systems that have been identified through risk assessments ▪ Physical security enhancements <ul style="list-style-type: none"> ◦ Security cameras (CCTV) ◦ Security screening equipment for people and baggage ◦ Lighting ◦ Access Controls ◦ Fencing, gates, barriers, etc. ▪ Enhancing Weapons of Mass Destruction and/or improvised explosive device prevention, detection, and response capabilities <ul style="list-style-type: none"> ◦ Chemical/Biological/Radiological/Nuclear/Explosive detection, prevention, and response equipment
Exercises	<ul style="list-style-type: none"> ▪ Long-term vulnerability reduction ▪ Operational coordination ▪ Operational communications ▪ Community resilience 	<ul style="list-style-type: none"> ▪ Response exercises, including exercise planning with community-based organizations