

FY2025 Emergency Management Performance Grant Program



Summary of Changes to Note in the Notice of Funding Opportunity (NOFO)

9/15/2025

This document is for general information and should not be considered a final and complete summary of significant changes.

MT DES has submitted a list of questions and requests for clarification to FEMA. Updates will be made to this document as FEMA provides clarification and guidance.

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Page 7: 2. Eligibility, A. Eligible Entities/Entity Types, b: Subapplicants:

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

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

c. All Recipients – Compliance with Federal Immigration Laws

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

Page 8: 2. Eligibility, C. Requirements for Personnel, Partners, and Other Parties

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

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

Page 8-9, 2. Eligibility, E. Additional Resources

a. National Incident Management System (NIMS) Implementation

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

“Relatedly, as a post-award requirement for FY 2025, all recipients and subrecipients in the 50 states and the District of Columbia must work toward achieving the Phase 3 National Qualification System (NQS) implementation objectives. In addition to executing their Implementation Plan, all jurisdictions shall

work towards issuing FEMA Version 25-02 Position Task Books to designated incident workforce personnel and ensure those personnel show progress in working toward task endorsements and minimum training requirements.”

Page 13-14. 3. Program Description, B. Goals, Objectives, and Priorities

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

- Extreme Weather Resilience; and
- Readiness

a. Extreme Weather Resilience

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

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

Extreme weather events can cause both acute and chronic impacts; communities must be resilient against threats as varied as extreme flooding, drought, hurricanes, and wildfires. Community resilience requires expanding partnerships, especially with community-based organizations that are on the ground before disasters strike and well

after. Emergency management partners must support the preparedness needs of disaster vulnerable communities to mitigate the impacts of future disasters.

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

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

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

Page 15. 3. Program Description, B. Goals, Objectives, and Priorities, c. Additional Guidance on EMPG Program Priorities

National Priority Area	Associated Core Capabilities ¹	Examples of Allowable Activities
Extreme Weather Resilience	<ul style="list-style-type: none"> • Community Resilience • Infrastructure Systems • Long-Term Vulnerability Reduction • Planning • Risk and Disaster Resilience Assessment • Threats and Hazards Identification 	<ul style="list-style-type: none"> • Development of/updates to disaster housing plans to incorporate and address weather-related data/projections/risks (e.g., ensure housing is not placed in potentially weather-related impacted areas and that housing solutions are weather-related resilient) • Establishment of weather-related or resiliency positions within emergency management offices to assess weather-related risks, develop mitigation strategies, and support updating of EOPs

	<ul style="list-style-type: none"> • Development of evacuation plans in accordance with weather-related exacerbated risk (e.g., mass evacuation during catastrophic fast-moving events, like wildfires) • Establishment of risk communication plans to inform all residents (including those with access and functional needs) about weather-related risks (e.g., what the communities can do at a local and individual level to prepare) and potential evacuations • Development of internal plans (including response and recovery) that incorporate weather-related impact on emergency management resources (e.g., personnel, logistics) • Development of weather-related literacy plans to enable communities to understand and prepare for their weather-related risks • Conduct exercises that incorporate weather-related considerations into response and recovery efforts to increase weather-related literacy and prepare communities to respond to and recover from extreme weather disasters • Incorporation of weather-related considerations into risk assessments (e.g., THIRA) and mitigation plans • Creation of or updates to hazard fuel reduction and safety zone mapping to manage vegetation within a jurisdiction to minimize potential wildfire ignitions along the wildland interface, e.g., urban and/or rural • Purchase/install standby generators to supply backup power for critical Emergency Operation Center electronic systems and equipment
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Page 28, 9. Post-Award Requirements and Administration, A. Administrative and National Policy Requirements

“Presidential Executive Orders”

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

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

statutory requirements on the use of federal funds for such unmanned aircraft systems, equipment, or services.”

Page 31, 9. Post-Award Requirements and Administration, L. Termination of the Federal Award, 2. Termination of the Federal Award by FEMA

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

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

- vii. If the awardee falls out of compliance with the Agency's statutory or regulatory authority, award terms and conditions, or other applicable laws.

Page 34, 9. Post-Award Requirements and Administration, N. Payment Information, Submission Process

"Submission Process

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

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

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

O. Immigration Conditions

1. Materiality of Pending Immigration Condition

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