

EM1 Assessment of NSGP Grants FY 2024 and FY 2024

Aspect	FY 2024 Nonprofit Security Grant Program (NSGP-NSS)	FY 2025 Nonprofit Security Grant Program (NSGP)	Differences / Notes
Program Name	Nonprofit Security Grant Program - National Security Supplemental (NSGP-NSS)	Fiscal Year 2025 Nonprofit Security Grant Program (NSGP)	FY 2024 uses "National Security Supplemental" indicating supplemental funding related to national security priorities; FY 2025 returns to standard NSGP naming.
Release / Application Dates	Released Oct 28, 2024; Application start: 10/28/2024 9 AM ET; Deadline: 01/24/2025 5 PM ET	Released July 28, 2025; Application start: 07/28/2025 8 AM ET; Deadline: 08/11/2025 5 PM ET	FY 2025 NOFO published later with a shorter application window (~2 weeks) compared to about 3 months in FY 2024.
Total Funding Available	\$210 million total; \$105 million for NSGP-NSS-UA (Urban Areas) and \$105 million for NSGP-NSS-S (State)	\$274.5 million total; \$137.25 million for NSGP-UA and \$137.25 million for NSGP-S	FY 2025 funding increased by approximately \$64.5 million.
Number of Awards	Projected 56 awards	Anticipated 56 awards	Number of awards stable year over year.
Maximum Award Amounts	- \$200,000 maximum per site. - Up to 3 sites per funding stream per nonprofit, max \$600,000 per state. - Consortium max \$1 million.	- Same site and per-site maximums as FY 2024. - Consortium maximum of \$1 million. - Same site and state limits.	Maximum award amounts and site limits remain consistent.

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Period of Performance	36 months; projected start 05/01/2025; end 04/30/2028	36 months; projected start 09/01/2025; end 08/31/2028	Start date shifted later by 4 months in FY 2025.
Program Description and Purpose	Focus on enhancing physical/cybersecurity and facility hardening of nonprofits at risk of terrorist or extremist attacks. Emphasis on protecting soft targets/crowded places. Integrating nonprofit preparedness with state and local efforts. Addresses threats including evolving cyber threats and domestic violent extremists. Includes one national priority area: protection of soft targets and crowded places.	Similar purpose: physical/cybersecurity and facility hardening of nonprofits at risk. FY 2025 adds more detailed national priority areas including:- Enhancing protection of soft targets/crowded places- Supporting Homeland Security Task Forces and Fusion Centers- Enhancing Cybersecurity- Enhancing Election Security- Supporting Border Crisis Response and Enforcement Support. Emphasis on whole community preparedness.	FY 2025 expands priority areas beyond soft targets to include fusion centers, cybersecurity, election security, and border crisis response. FY 2024 focuses more narrowly on soft targets/crowded places as the single national priority.
Eligible Applicants	Only State Administrative Agencies (SAAs) may apply to FEMA. Nonprofits and consortia apply through SAAs. Nonprofits must be 501(c)(3) or equivalent. Must demonstrate high risk of terrorist or extremist attack. NSGP-NSS-UA for nonprofits within FY 2024 UASI-designated high-risk urban areas. NSGP-NSS-	Same eligibility framework: SAAs apply, nonprofits are subapplicants. 501(c)(3) or equivalent nonprofits. Must demonstrate risk. NSGP-UA and NSGP-S designations based on FY 2025 designated high-risk urban areas. Consortium applications allowed. Additional vetting for foreign nationals in personnel. Explicit	Eligibility criteria consistent, but FY 2025 includes explicit language on personnel vetting and restrictions regarding foreign nationals. FY 2025 also clarifies "Designated" high-risk urban areas terminology

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	S for nonprofits outside. Consortium applications allowed.	mention of adhering to "staff American, stay in America" policies for personnel.	versus FY 2024 "UASI-designated".
Application Process	Applications submitted by SAAs in FEMA GO. Subapplicants submit to SAAs per state-specific deadlines. Required documents include Investment Justifications (IJs), vulnerability/risk assessments, mission statements. Consortium applications require additional Consortium Workbook. SAAs rank and submit prioritization trackers. Technical assistance funding of 2% allowed for outreach.	Similar process with FEMA GO submission by SAAs. Subapplicants submit IJs, vulnerability assessments, mission statements. Consortium applications similar. SAAs submit prioritization trackers representing 150% of allocation to FEMA. No mention of 2% technical assistance funding for outreach in FY 2025.	Application procedures largely consistent. FY 2025 requires SAAs to submit prioritization trackers with IJs totaling 150% of allocations to allow adjustment. Technical assistance funding is detailed in FY 2024 NOFO but not explicitly in FY 2025.
Application Evaluation and Scoring	SAAs score applications using criteria aligned to program intent. Final scores multiplied by factors:- 4x for heightened threat from Israel-Hamas war (FY 2024 specific)- 3x for ideology-based/spiritual/religious nonprofits- 2x for secular educational and medical- 1x for others. 10 extra points for disadvantaged communities (via CEJST). Security review	Similar SAA scoring with multipliers:- 3x for ideology-based/spiritual/religious nonprofits- 2x for secular medical and educational- 1x for others. 15 bonus points for nonprofits never funded before. Security review by DHS Intelligence after scoring. Selection by score within state/urban area allocation until exhausted. Secretary of Homeland Security	FY 2024 includes a 4x multiplier specifically for Israel-Hamas war related threats and 10 points for disadvantaged communities. FY 2025 replaces Israel-Hamas multiplier with 15 bonus points for first-time applicants and removes CEJST-based points.

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	by DHS Intelligence after scoring. Selection based on final scores and Secretary discretion.	makes final funding decisions.	Both apply multipliers for organization type. FY 2025 provides more detail on tie-breaking and final selection. Security review processes are consistent.
Funding Restrictions and Allowable Costs	<p>Allowable costs include:- Planning, Equipment, Training, Exercises (POETE) focused on facility hardening and cybersecurity.- Contracted security personnel allowed but no equipment for them.- Management & Administration (M&A) up to 5% for both SAAs and subrecipients.- Indirect costs allowed with documentation.- Prohibitions include organization costs, operational overtime, hiring public safety personnel, lobbying, and certain technologies (license plate readers, facial recognition).- Construction only with prior FEMA approval, capped at \$1 million or 15% of award.</p>	<p>Similar guidelines:- Planning, Equipment, Training, Exercises allowed.- Contracted security personnel allowed with restrictions.- M&A allowed up to 5% for SAAs and subrecipients.- Indirect costs allowed with agreements.- Same prohibitions on organization costs, operational overtime, hiring public safety personnel, lobbying, and prohibited tech.- Construction requires prior approval, capped at greater of \$1 million or 15% of award.- Explicit allowance of unmanned aircraft systems consistent with new Executive Order (FY 2025).</p>	<p>Funding restrictions and allowable costs are largely consistent. FY 2025 adds allowance for drones (unmanned aircraft systems) in compliance with Executive Order 14305. Both prohibit certain surveillance tech and operational costs. Construction and renovation restrictions consistent. M&A and indirect cost policies consistent.</p>

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Cost Share / Match	No cost share requirement.	No cost share requirement.	No change.
Reporting and Monitoring	Standard reporting (financial, programmatic) per Preparedness Grants Manual. Monitoring includes site visits, desk reviews. Compliance with civil rights laws required. Participation in program evaluation required if selected.	Same as FY 2024: financial and programmatic reporting, monitoring, civil rights compliance. Program evaluation participation required if selected.	Consistent reporting and oversight requirements.
Unique Features	<ul style="list-style-type: none"> - Specific 4x multiplier for Israel-Hamas war related threats.- 10 point bonus for disadvantaged communities via CEJST.- Technical assistance funding of up to 2% for outreach.- Detailed Authorized Equipment List (AEL) with equipment codes.- Emphasis on integration with state/local preparedness.- Emphasis on protecting soft targets/crowded places as national priority area. 	<ul style="list-style-type: none"> - First-time applicants receive 15 bonus points.- Broader list of National Priority Areas (including fusion centers, election security, border crisis).- Explicit vetting policies for foreign nationals.- Executive Order allowance for unmanned aircraft systems.- SAAs submit 150% of allocations in prioritization trackers.- Emphasis on whole community preparedness and multiple enduring needs.- Updated AEL with similar equipment categories. 	FY 2024 includes Israel-Hamas war related multiplier and disadvantaged community scoring; FY 2025 replaces with first-time applicant bonus. FY 2025 expands national priorities. FY 2025 includes personnel vetting language and drone equipment allowance. NSGP-NSS (2024) is supplemental funding; FY 2025 NSGP is base program funding. Both have

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			detailed AEL lists with similar equipment types but some code/title changes may exist. FY 2025 incorporates new Executive Orders and recent policy updates.
Urban Area Designations	Based on FY 2024 Urban Area Security Initiative (UASI) designated high-risk urban areas (detailed list provided).	Based on FY 2025 Designated high-risk urban areas (detailed list provided).	Different fiscal year designations; lists updated annually reflecting threat assessments.
Application Systems and Requirements	Applications submitted through FEMA GO, with detailed registration requirements (UEI, SAM, login.gov). FEMA GO supports latest browsers; IE not supported. Electronic submission mandatory. Proof of timely submission via system timestamp.	Same systems and requirements for FEMA GO, UEI, SAM, login.gov. Same browser support. Electronic submission mandatory. Proof of timely submission via system timestamp.	Consistent application system and requirements.
Consortium Applications	Allowed; consortium lead applies for up to \$1 million total. Consortium must submit Consortium Workbook. Lead must manage subaward compliance. \$52.5 million (25% of total) reserved	Allowed; same \$1 million max per consortium. Consortium Workbook required. Lead manages subaward compliance. No specific dollar amount reserved mentioned.	Consortium application process consistent. FY 2024 specifies 25% funding reserved for consortiums; FY 2025 does not

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	for consortium applications.		explicitly mention this.
Training and Exercise Costs	Allowed for security-related training and exercises. Overtime, backfill, and travel not allowed. Training topics include terrorism awareness, active shooter, first aid, etc. Exercises must follow HSEEP guidance.	Same allowable costs and restrictions. Training topics and exercise guidance consistent. Emphasis on addressing specific threats and vulnerabilities.	Consistent training and exercise funding policies and requirements.
Priority Areas Table	Focus on Protection of Soft Targets/Crowded Places as national priority. Secondary priorities include planning, training, exercises. Table links priorities to core capabilities and lifelines.	Broader national priority areas including fusion centers, cybersecurity, election security, border crisis response. Enduring needs (planning, training, equipment, exercises).	FY 2025 expands priority areas to address evolving homeland security concerns. FY 2024 focused narrowly on soft targets/crowded places.
Mandatory Civil Rights and Compliance	Compliance required with federal civil rights laws (Section 504, Title VI, etc.). Monitoring and oversight for compliance. Non-discrimination emphasized.	Same civil rights compliance and monitoring requirements. Explicit reference to Executive Order 14173 (FY 2025).	Consistent civil rights requirements; FY 2025 references recent EO on ending illegal discrimination.
Environmental Planning and Historic Preservation (EHP)	Compliance required; some equipment installation may trigger EHP review. Refer to Preparedness Grants Manual for details.	Same EHP compliance requirements and references.	Consistent EHP requirements.

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Build America, Buy America Act (BABAA)	Applies to infrastructure projects; requires domestic sourcing of materials. Waivers allowed under specified conditions. Detailed FEMA policy referenced.	Same BABAA requirements and waiver process. Reference to recent OMB guidance and FEMA policy.	Consistent BABAA compliance, reflecting updated federal infrastructure policies.
Contact Information	FEMA Grants News, Preparedness Officers, Award Administration Division, Regional Offices, Civil Rights Office, EHP Office, FEMA GO Helpdesk contacts provided.	Same types of contact information with updated emails and phone numbers. Addition of FEMA Office of Environmental Planning and Historic Preservation contact.	Contact structure consistent; updated contact details.

Summary:

- The FY 2024 NSGP-NSS is a supplemental funding opportunity with a focused priority on protecting soft targets and crowded places, including a specific scoring multiplier tied to heightened threats from the Israel-Hamas war and consideration of disadvantaged communities.
- The FY 2025 NSGP is a broader base program with expanded national priority areas, including fusion centers, election security, cybersecurity, and border crisis response, reflecting an evolving threat environment.
- Eligibility, application processes, funding limits, period of performance, and reporting requirements remain largely consistent, with minor updates such as personnel vetting policies and allowance for unmanned aircraft systems in FY 2025.
- Scoring and evaluation criteria are similar, but FY 2025 removes the Israel-Hamas multiplier and CEJST scoring, replacing them with bonus points for first-time applicants.
- Both years require applications through State Administrative Agencies and utilize a two-tiered review process involving state and federal reviews, including a DHS intelligence security review.
- Funding levels increased in FY 2025, with more emphasis on whole community preparedness and broader homeland security mission alignment.

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Differences / Notes
Funding Amount	\$319,550,000	\$319.5 million	Essentially the same, FY24 states exact \$319,550,000, FY25 rounds to \$319.5 million.
Number of Awards	Not explicitly stated in excerpt	56 awards	FY25 explicitly states 56 awards.
Award Range	Not explicitly stated	\$825,152 - \$24,392,241	FY25 provides specific award range.
Application Start Date	04/16/2024	07/28/2025	Different application start dates by over a year.
Application End Date	06/24/2024 05:00 PM ET	08/11/2025 05:00 PM ET	Different deadlines aligned with application start dates.
Funding Selection Date	No later than August 23, 2024	No later than August 23, 2025	One year apart.
Award Date	No later than September 30, 2024	No later than September 30, 2025	One year apart.
Period of Performance Start/End	10/01/2023 - 09/30/2026	10/01/2024 - 09/30/2027	One year shift forward.
Eligible Applicants	States, territories, Republic of Marshall Islands	States and territories (56	FY24 includes Republic of Marshall Islands

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Differences / Notes
		states and territories)	explicitly; FY25 does not mention it.
Cost Share Requirement	50% cost share required; waived for insular areas and Republic of Marshall Islands	50% cost share required; waived for insular areas	FY24 explicitly includes Republic of Marshall Islands waiver; FY25 does not mention it explicitly.
National Priorities	Equity, Climate Resilience, Readiness	Extreme Weather Resilience, Readiness	FY24 highlights Equity and Climate Resilience as priorities; FY25 replaces Equity with Extreme Weather Resilience as a national priority. Both retain Readiness.
Equity Priority	Strong emphasis on equity including underserved communities, at least one project must focus exclusively on equity	No explicit mention of equity as a national priority in provided excerpt	FY24 mandates at least one equity-focused project; FY25 does not mention equity as a national priority.
Climate Resilience	Detailed focus on climate resilience and related planning	Extreme Weather Resilience focus, similar in concept but	FY25 frames climate issues as "Extreme Weather Resilience," continuing

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Differences / Notes
		emphasized as national priority	similar themes but with slightly different phrasing.
NIMS and NQS Implementation	FY24 requires Phase 2 NQS implementation for states and D.C.; territories to develop Implementation Plan	FY25 requires Phase 3 NQS implementation for states and D.C.; territories not specified	FY25 advances the NQS implementation phase requirement from Phase 2 to Phase 3 for states and D.C.
Public Alert and Warning	Exercise objectives to practice emergency alerts via IPAWS; detailed integration guidance	Same requirements	Similar language regarding IPAWS exercises and After-Action Reports.
EMAC Membership	Required except for American Samoa, Republic of Marshall Islands, and Northern Mariana Islands	Required except for American Samoa and Northern Mariana Islands; Marshall Islands not mentioned	FY25 excludes Marshall Islands from exception list, possibly implying different treatment.
Management and Administration (M&A) Costs	State/territory EMA may use up to 5% of award; local EMAs may retain up to 5% of funds from state. SAA not eligible if separate from EMA	Same description	Language is very similar; no material difference noted.

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Differences / Notes
Pre-Award Costs	Allowed only with prior written approval and detailed justification	Pre-award costs not allowed	FY24 allows pre-award costs with approval; FY25 states pre-award costs are not allowed.
Program Evaluation	Recipients required to participate in DHS-led evaluations if selected; evaluation costs allowable	Same requirement	Similar language and requirements.
Allowable Costs	Detailed lists including planning, organization, equipment, training, exercises, travel, construction (with advance approval), real property, etc.	Similar detailed lists; emphasis on POETE categories	Both detailed; no major differences in allowed cost categories.
Unallowable Costs	Firearms, ammunition, sworn public safety officer costs, supplanting public safety positions, unrelated activities, clothing for everyday wear	Same categories	Consistent unallowable costs.
Application Submission	Via FEMA GO; requires UEI, EIN, SAM registration, login.gov account	Same process	No change in application submission process.
Application Deadline	06/24/2024 05:00 PM ET	08/11/2025 05:00 PM ET	Different deadlines reflecting respective fiscal years.
Work Plan	Mandatory submission; must identify 3-5 priorities, align with THIRA/SPR, include performance goals	Same requirement	Similar requirements for Work Plan content and approval.

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Differences / Notes
Reporting Requirements	Includes THIRA every 3 years, SPR annually, NIMS and NQS annually, Distribution Management Plan annually, Quarterly Performance and Financial Reports	Same requirements	Reporting cycles and content consistent between years.
Build America Buy America Act	Applies to infrastructure projects; waivers possible	Same requirements	No change noted.

Summary of Key Differences:

- FY 2024 NOFO emphasizes **Equity** as a national priority with a project requirement focused on equity; FY 2025 replaces this with **Extreme Weather Resilience** as a priority.
- FY 2025 advances NQS implementation requirements from Phase 2 to Phase 3 for states and D.C.
- FY 2024 allows pre-award costs with approval; FY 2025 prohibits pre-award costs.
- FY 2024 explicitly mentions the Republic of Marshall Islands for eligibility and cost share waiver; FY 2025 does not.
- Application timelines and award periods shift forward by one year, consistent with fiscal year differences.

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Detailed Differences / Notes
Funding Amount & Awards	- Total Funding: \$319,550,000- No explicit mention of number of awards or award range	- Total Funding: \$319.5 million- Anticipated Number of Awards: 56- Award Range: \$825,152 - \$24,392,241	FY25 explicitly states the number of awards (56) and award range, while FY24 only states total funding. FY25 provides more granularity on award distribution.
Application Dates	- Start Date: 04/16/2024- Deadline: 06/24/2024 5:00 PM ET- Funding Selection: No later than 08/23/2024- Award Date: No later than 09/30/2024- Period of Performance: 10/01/2023 - 09/30/2026	- Start Date: 07/28/2025 9:00 AM ET- Deadline: 08/11/2025 5:00 PM ET- Funding Selection: No later than 08/23/2025- Award Date: No later than 09/30/2025- Period of Performance: 10/01/2024 - 09/30/2027	Dates shift forward by approximately one year, consistent with the fiscal year cycle. FY25 application window is shorter (about two weeks) compared to FY24 (about two months).
Eligible Applicants	- States, territories, Republic of Marshall Islands- Only one application per state/territory- Authorized Organization Representative (AOR) must be authorized employee; consultants/contractors not allowed as AOR	- All 56 states and territories eligible- Only one application per state/territory- Same AOR requirements	FY24 explicitly includes Republic of Marshall Islands as eligible applicant; FY25 does not mention it. Both maintain strict AOR requirements.

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Detailed Differences / Notes
Cost Share Requirement	- 50% non-federal cost share required- Waived for insular areas and Republic of Marshall Islands - Cost share can be cash or third-party in-kind- Federal funds cannot be matched with other federal funds- Recipient contributions must be verifiable, reasonable, allowable, allocable, necessary, and compliant with federal regulations	- 50% non-federal cost share required- Waived for insular areas (American Samoa, Guam, U.S. Virgin Islands, Northern Mariana Islands)- Same matching rules and requirements	FY24 specifically includes the Republic of Marshall Islands in the cost share waiver; FY25 omits this. Both emphasize compliance with 2 CFR 200.306 cost share rules.
National Priorities	- Equity (strong emphasis)- Climate Resilience- Readiness- At least one project must focus exclusively on equity considerations- Equity includes underserved communities and a broad definition of at-risk populations- Climate Resilience includes detailed activities supporting mitigation, planning, and adaptation- Readiness focuses on increasing emergency management capabilities and coordination	- Extreme Weather Resilience- Readiness- No explicit mention of equity as a national priority- Extreme Weather Resilience focuses on strengthening capabilities to manage extreme and frequent disasters such as wildfires, flooding,	FY24 introduces Equity as a mandatory national priority with explicit project requirements, reflecting a significant policy focus.FY25 replaces Equity with Extreme Weather Resilience as the major national priority, reflecting evolving threat focus.Climate Resilience in FY24 is rebranded or refocused as Extreme Weather Resilience in FY25.Readiness remains a priority in both but with slightly different framing.This shift shows a change

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Detailed Differences / Notes
		drought, and heat-Readiness aligns with FEMA's National Capability Targets to build a prepared nation- Both emphasize whole community approach	in programmatic emphasis between years.
NIMS and NQS Implementation	- Recipients must maintain NIMS adoption and implementation- FY24 requires Phase 2 NQS implementation for states and D.C.; territories develop Implementation Plan- Lists FEMA website for objectives and reporting- Emphasis on execution of Phase 1 NQS Implementation Plan as minimum for states/D.C.	- Recipients must maintain NIMS adoption and implementation- FY25 requires Phase 3 NQS implementation for states and D.C.; territories not specified in excerpt- Same FEMA website for objectives- Emphasis on moving toward issuing Position Task Books and task endorsement	FY25 advances the NQS phase requirement for states and D.C. from Phase 2 to Phase 3, indicating progression in qualification system implementation. Territories' requirements in FY25 are less explicit. This reflects a programmatic maturation in qualifications and standardization.

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Detailed Differences / Notes
		s- Stronger and advanced NQS requirements compared to FY24	
Public Alert and Warning	<p>- Exercises must include objectives to practice alerting via FEMA IPAWS- Exercises to cover message writing, decision-making, coordination, approval, and sending alerts- Integration of IPAWS exercises into overall preparedness- After-Action Reports and Improvement Plans required- Reference to IPAWS Exercise Starter Kit and IPAWS Message Design Dashboard training</p>	<p>- Same exercise and alerting requirements- Emphasis on practice of analysis, decision-making, message writing, approval coordination, and sending alerts via IPAWS- Integration of IPAWS testing and drills into preparedness and exercises- After-Action Reports and Improvement Plans required- Reference to IPAWS resources</p>	<p>Language and requirements are essentially consistent; no significant differences noted.</p>

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Detailed Differences / Notes
EMAC Membership	<ul style="list-style-type: none"> - Recipients must belong to or act as EMAC member states- Exceptions: American Samoa, Republic of Marshall Islands, Northern Mariana Islands- Assets funded must be deployable per EMAC agreements 	<ul style="list-style-type: none"> - Same requirement- Exceptions: American Samoa and Northern Mariana Islands only- Republic of Marshall Islands not mentioned 	FY25 omits the Republic of Marshall Islands from the exception list, possibly implying different treatment or omission. This may reflect policy or eligibility changes.
Management & Administration (M&A) Costs	<ul style="list-style-type: none"> - States/territories EMA may use up to 5% of award for M&A- Local EMAs may retain up to 5% of funds received from state- SAA not eligible to retain funds for M&A if not EMA- M&A costs include financial management, reporting, monitoring, training, travel, and contractual support- Salaries of emergency managers typically not M&A unless assigned specifically 	<ul style="list-style-type: none"> - Same policy and percentage limits- Similar examples and descriptions of M&A costs- Same notes on salaries 	No substantive differences; language is consistent.
Pre-Award Costs	<ul style="list-style-type: none"> - Allowable only with prior written approval- Requires detailed justification in application- Must be signed by AOR- Must include budget break-out and justification 	<ul style="list-style-type: none"> - Not allowed 	FY24 allows pre-award costs with FEMA approval and justification; FY25 explicitly prohibits pre-award costs. This is a significant change in funding policy.
Program Evaluation	<ul style="list-style-type: none"> - Recipients required to participate in 	<ul style="list-style-type: none"> - Same requirements 	No material differences; consistent

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	DHS/Component/Program Office-led evaluation if selected- Evaluations may involve surveys, interviews, site visits- Costs allowed as direct or indirect costs- Encouraged but not required to participate after period of performance- References Evidence Act and OMB guidance	and guidance- Same emphasis on evaluation as a tool for learning and improving program delivery	emphasis on program evaluation.
Allowable and Unallowable Costs	- Detailed allowable categories: Planning, Organization, Equipment (per Authorized Equipment List), Training, Exercises, Travel, Construction (with prior approval), Real Property (with prior approval), Operational Overtime, Whole Community Preparedness, Maintenance and Sustainment- Unallowable: firearms, ammunition, sworn public safety officer costs, supplanting public safety positions, unrelated activities, clothing for everyday wear	- Similar detailed allowable cost categories and guidance- Same unallowable costs listed- Emphasis on consulting Regional EMPG Program Manager for unclear items	Language and categories are substantially consistent; no major differences.
Application Submission Process	- Via FEMA GO system- Requires UEI, EIN, SAM registration, login.gov account- Detailed registration steps and timeline advice- Applicants encouraged to begin registration 4 weeks prior to deadline- Standard	- Same process and requirements- Same registration and application submission	Submission requirements and process are the same, reflecting continuity in application procedures.

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Detailed Differences / Notes
	SF forms required- Work Plan mandatory- Late applications not accepted unless good cause- Technical support contacts provided	steps- Same advice on starting registration early- Same forms and Work Plan requirements- Same deadline and late application policies- Technical support contacts consistent	
Work Plan Requirements	<p>- Mandatory submission- Identify 3-5 priorities mutually agreed with Regional Administrator- Priorities driven primarily by THIRA/SPR process and other relevant sources- At least one performance goal per priority- Performance goals must be SMART (specific, measurable, achievable, relevant, time-bound)- Must describe impact and quantify capability gap closure- Regional Administrator approval required before fund drawdown- Changes require prior approval if >10% budget transfer</p>	<p>- Same mandatory submission- Same priority identification and agreement process- Same emphasis on THIRA/SPR and other relevant sources- Same SMART goals and impact description requirements- Same requirement for Regional Administrator</p>	Work Plan requirements are effectively unchanged, ensuring continuity in planning and accountability.

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Detailed Differences / Notes
		approval- Same advance approval requirement for significant changes	
Reporting Requirements	<ul style="list-style-type: none"> - THIRA every 3 years- - SPR annually- - NIMS and NQS annual reporting- - Distribution Management Plan annual updates- - Multi-year Training and Exercise Plan (TEP)/IPP annually- - Quarterly Performance and Financial Reports- - Biannual Strategy Implementation Report- - Quarterly exercise and training activity reports- - Various submission platforms (Prep Toolkit, FEMA GO, email) 	<ul style="list-style-type: none"> - Same reporting requirements with identical due dates and submission methods 	Reporting cadence and content consistent; no substantive differences.
Build America, Buy America Act	<ul style="list-style-type: none"> - Applies to infrastructure projects funded by EMPG- - Must use U.S.-produced iron, steel, manufactured products, and construction materials- - Waivers may be granted under specific conditions- - Applies only to permanent infrastructure components, not tools or movable equipment 	<ul style="list-style-type: none"> - Same requirements, including waivers and definitions- - Reference to FEMA Policy 207-22-0001 and relevant OMB memoranda 	No change in BABAA compliance requirements or procedures.
EMAC Membership	<ul style="list-style-type: none"> - Required for all assets funded by EMPG- - Exceptions: American 	<ul style="list-style-type: none"> - Same requirement- - Exceptions: 	FY25 omits Republic of Marshall Islands from exceptions,

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Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Detailed Differences / Notes
	Samoa, Republic of Marshall Islands, Northern Mariana Islands- Assets must be deployable per EMAC agreements	American Samoa and Northern Mariana Islands only- Republic of Marshall Islands omitted	possibly indicating policy change or oversight.
Equity Focus	- Equity is a national priority - Applicants required to designate at least one project exclusively addressing equity- Equity includes underserved communities broadly defined- Recipients encouraged to factor equity into all investments	- No explicit mention of equity as a national priority- No explicit project requirement for equity focus- Emphasis shifts toward Extreme Weather Resilience	FY24 places strong emphasis and mandates equity-focused investments; FY25 shifts away from explicit equity priority, focusing instead on extreme weather resilience. This represents a notable policy and funding focus shift.
Pre-award Costs	- Allowed with prior written approval and detailed justification included in application	- Not allowed	FY25 restricts pre-award costs more strictly than FY24.
NQS Implementation	- Phase 2 implementation for states and D.C.- Territories develop Implementation Plan	- Phase 3 implementation for states and D.C.- Territories not specified	FY25 shows advancement of NQS implementation requirements, indicating a step forward in emergency management workforce qualification standards.

EM1 FY 2024 and FY 2025 In-Depth Assessment

Section/Topic	FY 2024 EMPG NOFO	FY 2025 EMPG NOFO	Detailed Differences / Notes
Application Submission Window	- Approximately 2 months (April 16 to June 24)	- Approximately 2 weeks (July 28 to August 11)	FY25 compresses the application window significantly, potentially impacting applicant preparation timelines.
Award Range	- Not specified	- \$825,152 - \$24,392,241	FY25 provides explicit award range, helping applicants understand funding scale.

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National Priorities - Equity	<p>"Equity in emergency management requires proactively prioritizing actions that reinforce cultural competency, accessibility, and inclusion, as well as reflect the historical context of specific groups of people. To that end, states and territories are strongly encouraged to explore how EMPG Program-funded activities can address the needs of underserved, at-risk communities to help ensure consistent and systematic, fair, just, and impartial treatment of all individuals before, during, and after a disaster, consistent with applicable law. The focus on equity and investing in strategies that meet the needs of underserved communities will strengthen the whole of community system of emergency management... To the extent possible, equity</p>	<p>The FY 2025 EMPG NOFO does not explicitly mention equity as a national priority or mandate a project focused exclusively on equity. Instead, it emphasizes "Extreme Weather Resilience" as a national priority area, describing the need to anticipate increasing demands from extreme and frequent disasters and build resilience through whole community engagement. While the whole community approach is discussed, there is no explicit mandatory equity-focused project requirement as was in FY 2024. Equity considerations may be implied within whole community preparedness but are not expressly stated or mandated.</p>

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	<p>considerations must be factored into all FY 2024 EMPG Program-funded investments across all national priority areas. Additionally, applicants are required to designate at least one project in their FY 2024 EMPG Program Work Plan and budget narrative that exclusively focuses on addressing equity considerations."</p>	
NQS Implementation Requirements	<p>"Relatedly, as a post-award requirement for FY 2024, all recipients and subrecipients in the 50 states and the District of Columbia must work toward achieving the Phase 2 National Qualification System (NQS) implementation objectives and must, at a minimum, execute the Implementation Plan they developed last year as part of the Phase 1 NQS Implementation Objectives. All other jurisdictions (including territories and FY 2024 EMPG Program subrecipients) are required to work toward implementation of NQS by developing an Implementation Plan."</p>	<p>"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 Position Task Books to designated incident workforce personnel and ensure those personnel show progress in working toward task endorsements and minimum training requirements. All other jurisdictions, including territories, are encouraged to work toward NQS implementation."</p>
Pre-Award Costs	<p>"Pre-award costs are allowable only with the prior written approval of DHS/FEMA and if they are included in the award agreement. To request pre-award costs, a written request must be included with the</p>	<p>"Pre-award costs are not allowed."</p>

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	application and be signed by the AOR. The request letter must outline what the pre-award costs are for, including a detailed budget break-out of pre-award costs from the post-award costs and a justification for approval."	
EMAC Membership Exception	"In support of the Goal, EMPG Program recipients must belong to, be located in, or act as an EMAC temporary member state, except for American Samoa, the Republic of the Marshall Islands, and the Commonwealth of the Northern Mariana Islands, which are not currently subject to these requirements. All assets supported in part or entirely with FY 2024 EMPG Program funding must, where applicable, be readily deployable to support emergency or disaster operations per existing EMAC agreements."	"In support of the National Preparedness Goal (the Goal), EMPG Program recipients must belong to, be located in, or act as an EMAC temporary member state, except for American Samoa and the Commonwealth of the Northern Mariana Islands, which are not currently subject to these requirements, though FEMA encourages EMAC membership regardless. All assets supported in part or entirely with FY 2025 EMPG Program funding must, where applicable, be readily deployable to support emergency or disaster operations per existing EMAC agreements."
Award Range	Not specified.	"Expected Award Range: \$825,152 - \$24,392,241"
Application Period	"a. Application Start Date: 04/16/2024.b. Application Submission Deadline: 06/24/2024 at 5 p.m. ET"	"Projected Application Start Date: 07/28/25 09:00 a.m. Eastern Time (ET).Projected Application End Date: 08/11/2025 05:00 p.m. Eastern Time (ET)"
Work Plan Project Goals	"Applicants must set at least one performance goal for each RA agreed-upon priority area that achieves a specific	"Applicants must set outcome-oriented performance goals for closing capability gaps related to the three-to-five agreed-upon

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	<p>outcome. Each goal must be specific, measurable, and achievable within the period of performance, relevant to the priority area, and have a target date for completion. Applicants must describe how achieving each goal or objective will impact the priority area it supports by the end of the period of performance. Each goal must include an estimate quantifying the extent to which the supporting investments will close capability gaps (e.g., 'Increase the percentage of people who can find and secure long-term housing by 10% within 1 year of an incident')."</p>	<p>priorities, aligning funding with high-priority strategic preparedness needs. An outcome-oriented approach will allow recipients to define success, benchmark their projects, and measure their progress in building capability. Recipients will be able to use this to generate a feedback cycle. If projects are not achieving desired outcomes, recipients will have a basis for revisiting plans and assessments and adjusting their projects and other investments."</p>
Unallowable Costs	<p>"Grant funds must comply with FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA Awards, and may not be used for the purchase of firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with weapons installed; Expenditures for weapons systems and ammunition; Costs associated with hiring, equipping, training, etc. sworn public safety officers whose primary job responsibilities include fulfilling traditional public safety duties such as law enforcement, firefighting, emergency medical services, or other first responder duties;</p>	<p>Same language with minor formatting differences: "Grant funds may not be used for the purchase of firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with weapons installed; Expenditures for weapons systems and ammunition; Costs associated with hiring, equipping, training, etc. sworn public safety officers whose primary job responsibilities include fulfilling traditional public safety duties such as law enforcement, firefighting, emergency medical services, or other first responder duties; Costs that supplant traditional public safety positions and responsibilities; Activities and</p>

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	<p>Costs that supplant traditional public safety positions and responsibilities; Activities and projects unrelated to the completion and implementation of the EMPG Program; or Clothing used for everyday wear by emergency management employees or other personnel."</p>	<p>projects unrelated to the completion and implementation of the EMPG Program; or Clothing used for everyday wear by emergency management employees or other personnel."</p>
<p>Indirect Costs (IDC)</p>	<p>"Applicants with a current negotiated IDC rate agreement who desire to charge indirect costs to a federal award must provide a copy of their IDC rate agreement with their applications. Not all applicants are required to have a current negotiated IDC rate agreement. Applicants that are not required to have a negotiated IDC rate agreement but are required to develop an IDC rate proposal must provide a copy of their proposal with their applications. Applicants who do not have a current negotiated IDC rate agreement (including a provisional rate) and wish to charge the de minimis rate must reach out to FEMA for further instructions. Applicants who wish to use a cost allocation plan in lieu of an IDC rate proposal must reach out to the FEMA Point of Contact for further instructions. As it relates to the IDC for subrecipients, a recipient must follow the</p>	<p>Similar language: "Applicants with a current negotiated IDC rate agreement who desire to charge indirect costs to a federal award must provide a copy of their IDC rate agreement with their applications. Not all applicants are required to have a current negotiated IDC rate agreement. Applicants that are not required to have a negotiated IDC rate agreement, but are required to develop an IDC rate proposal, must provide a copy of their proposal with their applications. Applicants without a current negotiated IDC rate agreement (including a provisional rate) and wish to charge the de minimis rate must reach out to FEMA for further instructions. Applicants who wish to use a cost allocation plan in lieu of an IDC rate proposal must reach out to FEMA for further instructions. As it relates to the IDC for subrecipients, a recipient must follow the requirements of 2 C.F.R. §§ 200.332 and 200.414 in approving the IDC rate for subawards."</p>

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	requirements of 2 C.F.R. §§ 200.332 and 200.414 in approving the IDC rate for subawards."	
Application Submission Process	<p>"To apply for an award under this program, all applicants must: 1. Apply for, update, or verify their UEI number and Employer Identification Number (EIN) from the Internal Revenue Service; 2. In the application, provide an UEI number; 3. Have an account with login.gov; 4. Register for, update, or verify their SAM account and ensure the account is active before submitting the application; 5. Register in FEMA GO, add the organization to the system, and establish the Authorized Organizational Representative (AOR). The organization's electronic business point of contact (EBiz POC) from the SAM registration may need to be involved in this step; 6. Submit the complete application in FEMA GO; and 7. Continue to maintain an active SAM registration with current information at all times during which it has an active federal award or an application or plan under consideration by a federal awarding agency."</p>	<p>Same instructions, nearly identical wording: "To apply for an award under this program, all applicants must: 1. Apply for, update, or verify their Unique Entity Identifier (UEI) number and Employer Identification Number (EIN) from the Internal Revenue Service (IRS); 2. In the application, provide an UEI number; 3. Have an account with login.gov; 4. Register for, update, or verify their System for Award Management (SAM) account and ensure the account is active before submitting the application; 5. Register in FEMA GO, add the organization to the system, and establish the Authorized Organizational Representative (AOR). The organization's electronic business point of contact (eBiz POC) from the SAM registration may need to be involved in this step; 6. Submit the complete application in FEMA GO; 7. Continue to maintain an active SAM registration with current information at all times during which it has an active federal award or an application or plan under consideration by a federal awarding agency."</p>

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Category	FY 2024 HSGP NOFO	FY 2025 HSGP NOFO	Differences / Notes
Funding Components	Three components: 1. State Homeland Security Program (SHSP) 2. Urban Area Security Initiative (UASI) 3. Operation Stonegarden (OPSG)	Two components: 1. State Homeland Security Program (SHSP) 2. Operation Stonegarden (OPSG)	UASI program is included in FY 2024 but not mentioned in FY 2025. FY 2025 focuses on SHSP and OPSG only.
Total Funding Available	\$1,008,000,000 SHSP: \$373,500,000 UASI: \$553,500,000 OPSG: \$81,000,000	\$454,500,000 SHSP: \$373,500,000 OPSG: \$81,000,000	FY 2025 total funding is significantly reduced compared to FY 2024, primarily due to absence of UASI funding. SHSP and OPSG funding amounts remain the same.
Program Goals	Enhance ability of state, local, tribal, and territorial governments and nonprofits to prevent, prepare for, protect against, and respond to terrorist attacks and other threats. Focus on building and sustaining core capabilities and addressing capability gaps identified in THIRA/SPR. Emphasis on six National Priority Areas.	Support statewide and SLTT governments in building, enhancing, and sustaining capabilities to prevent, prepare for, protect against, and respond to terrorism. Emphasis on five National Priority Areas (NPAs) aligned with Administration priorities.	FY 2024 identifies six National Priority Areas, FY 2025 defines five NPAs with slight changes (e.g., "Supporting Homeland Security Task Forces and Fusion Centers" replaces "Enhancing information and intelligence sharing and analysis"). The "Enhancing Election Security" and "Supporting Border Crisis Response and

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			Enforcement" have minimum spend requirements in both years, but the overall NPA structure varies. UASI is not present in FY 2025.
National Priority Areas (NPAs)	Six NPAs: 1) Enhancing protection of soft targets/crowded places (no minimum spend) 2) Enhancing information and intelligence sharing and analysis (no minimum spend) 3) Combating domestic violent extremism (no minimum spend) 4) Enhancing cybersecurity (no minimum spend) 5) Enhancing community preparedness and resilience (no minimum spend) 6) Enhancing election security (3% minimum spend)	Five NPAs: 1) Enhancing 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% minimum spend) 5) Supporting Border Crisis Response and Enforcement (10% minimum spend)	FY 2025 adds "Supporting Border Crisis Response and Enforcement" with a 10% minimum allocation, a new priority area. "Combating domestic violent extremism" and "Enhancing community preparedness and resilience" are not explicitly listed in FY 2025 NPAs. "Supporting Homeland Security Task Forces and Fusion Centers" replaces the information sharing and intelligence sharing priority. Minimum spend requirements differ slightly.
Law Enforcement Terrorism Prevention	At least 35% of combined SHSP and UASI funds must be allocated to LETPA	Maintains the 35% LETPA allocation requirement for SHSP funds.	LETPA percentage and requirements consistent between years. FY 2025

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Activities (LETPA)	activities. LETPA funds can be allocated across the six National Priority Areas or other investments meeting LETPA criteria.	LETPA funds can be applied to projects across the five NPAs or other eligible investments.	applies LETPA only to SHSP (no UASI).
Eligible Applicants	State Administrative Agency (SAA) only eligible to submit applications. Subawards allowed to local, tribal, and other entities. Tribal governments not eligible to apply directly but may receive funds via state. OPSG subrecipients divided into three tiers based on proximity to border.	Same as FY 2024: SAA only eligible to apply. Subawards to local, tribal, and other entities. Tribal governments not eligible to apply directly but may receive funds through SAA. OPSG subrecipients divided into three tiers based on border proximity.	Eligibility criteria remain consistent.
Pass-Through Requirements	SAAs must pass through at least 80% of SHSP and UASI funds to local units of government or tribes within 45 calendar days of receipt. Pass-through percentages based on total HSGP award before M&A deductions. Territories except Puerto Rico exempt.	SAAs must pass through at least 80% of SHSP funds to local or tribal governments within 45 calendar days of receipt. Pass-through percentages calculated before M&A deductions. Territories except Puerto Rico exempt.	Similar pass-through requirements; FY 2025 excludes UASI (which is not funded).

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Management and Administration (M&A) Costs	Up to 5% of total HSGP funds awarded may be used for M&A by SAAs; subrecipients may use up to 5% of passed-through funds for M&A. M&A funds may be credited toward National Priority Area minimum spends. OPSG M&A funds capped and may be retained from SHSP to cover OPSG management.	Up to 5% of SHSP and OPSG combined award may be used for M&A by SAAs; subrecipients may use up to 5% of subawards for M&A. States may retain up to 2.5% of OPSG funds for M&A, with an additional 2.5% from SHSP for OPSG management, totaling 5%. M&A can be applied toward NPA spending requirements.	FY 2025 clarifies OPSG M&A retention capped at 2.5% with an additional 2.5% from SHSP for OPSG management. M&A rules largely consistent but wording more detailed.
Period of Performance	36 months Start: 09/01/2024 End: 08/31/2027	36 months Start: 09/01/2025 End: 08/31/2028	Same duration, shifted one year later for FY 2025.
Application Submission Dates	Start: 04/16/2024 Deadline: 06/24/2024 5 PM ET Funding selection no later than 08/23/2024 Award date no later than 09/30/2024	Start: 07/28/2025 8 AM ET Deadline: 08/11/2025 5 PM ET Funding selection no later than 08/23/2025 Award date no later than 09/30/2025	FY 2025 application period roughly 1.5 months; FY 2024 period was about 2 months. Dates shifted approximately one year later.
Application Requirements	Standard forms including SF-424 series, Grants.gov Lobbying Form, SF-LLL. Program-specific forms	Same standard forms required. Program-specific forms include Investment Justification (IJ) for	More detailed instructions in FY 2025 regarding SAC Charter and Membership requirements. IJ

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	include Investment Justification (IJ) for SHSP and UASI, Concept of Operations and Operations Orders for OPSG, detailed budgets. Must submit fusion center project for SHSP and UASI. OPSG requires Concept of Operations and Operations Orders.	SHSP, Operations Orders for OPSG, detailed budgets. SAC Charter and Membership list required for SHSP. Fusion center project mandatory for SHSP. OPSG requires Operations Orders and inventory. Pre-award costs, indirect cost agreement may be required.	requirements largely consistent. OPSG requirements similar but more detailed on Operations Orders submission.
National Incident Management System (NIMS) Implementation	Required for all SLTT governments prior to allocation; includes Incident Command System. Recipients must demonstrate adoption and implementation during period of performance.	Same requirement as FY 2024.	No change.
Emergency Management Assistance Compact (EMAC)	SHSP recipients must belong to or act as temporary members of EMAC (except American Samoa and Northern Mariana Islands). Assets funded must be deployable and NIMS-typed when possible.	SHSP recipients must participate in EMAC; same exceptions. Assets funded must be deployable and NIMS-typed when possible.	No change.

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Operational Overtime Costs	Allowable under specific categories such as NTAS elevated alerts, National Security Special Events, states of emergency, National Critical Infrastructure Prioritization Program, directed transit patrols, etc. Prior approval required except for NTAS elevated alerts. Operational overtime must be reasonable, justified, and documented.	Same categories and conditions as FY 2024. Prior approval required except NTAS alerts. Overtime pay limits and documentation rules consistent.	No substantive change; FY 2025 clarifies and reiterates policies.
Construction and Renovation	Allowed with prior written FEMA approval for capability targets related to terrorism preparedness. Must undergo Environmental Planning and Historic Preservation (EHP) review. SF-424C and SF-424D required.	Allowed under SHSP with prior approval and EHP review. OPSG funds may not be used for any construction.	FY 2025 explicitly prohibits construction under OPSG.
Allowable Equipment	21 categories listed on Authorized Equipment List (AEL). Equipment must meet regulatory and FEMA standards.	Similar equipment categories and requirements as FY 2024. Controlled equipment restrictions reiterated. sUAS	No major change; updated references and guidance documents.

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	Controlled equipment restrictions apply (e.g., no tracked armored vehicles, weapons, ammunition). PPE procurement preference to domestic manufacturers encouraged. Includes general purpose equipment and small unmanned aircraft systems (sUAS).	allowed. General purpose equipment and PPE procurement preferences consistent.	
Unallowable Costs	Weapons and accessories (including ammunition), evidence collection, arrest processing, DUI checkpoints equipment, staffing (except overtime) and general IT equipment under OPSG. Construction and exercise expenses prohibited under OPSG. Supplanting traditional public safety positions prohibited.	Same unallowable costs as FY 2024. Additional emphasis on exercise expenses not allowed under OPSG. Supplanting prohibited.	No substantive change.
THIRA/SPR Process	Required for SHSP and UASI. Results do not affect	Same requirements for SHSP. No UASI in FY 2025. OPSG	Consistent.

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	allocation but inform capability gap identification and investment priorities. OPSG not required to complete THIRA/SPR.	not required. THIRA/SPR results do not affect allocation.	
Investment Justification (IJ)	Required for SHSP and UASI; must address National Priority Areas and LETPA requirements. Minimum 2 and maximum 12 investments. Must include fusion center project. Detailed project info encouraged at application or by Biannual Strategic Implementation Report (BSIR).	Required for SHSP. Minimum 2 and maximum 12 investments. Must include fusion center project under "Supporting Homeland Security Task Forces and Fusion Centers." Detailed project info encouraged at application or in BSIR. IJ must label projects supporting LETPA and NPAs clearly.	UASI removed in FY 2025. Fusion center project requirement remains but priority area name updated. Greater emphasis on clear labeling and project justification.
Application Review and Selection	Two-phase review: State review by SAA, then federal review by DHS/FEMA. Evaluated for eligibility, programmatic criteria, NIMS compliance, and effectiveness in addressing NPAs and LETPA. Funds may be placed on hold up to 30% if	Similar two-phase review: SAA initial review, federal review by DHS/FEMA. Evaluation includes eligibility, programmatic criteria, NIMS, NPAs, and LETPA. Funds hold policy for unmet NPA requirements applies. OPSG reviewed by SAA	Process largely unchanged; FY 2025 includes more detailed descriptions of review criteria and procedures.

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Category	FY 2024 HSGP NOFO	FY 2025 HSGP NOFO	Differences / Notes
	NPA requirements unmet. OPSG applications reviewed by SAA and USBP Sector.	and USBP Sector Headquarters for feasibility and impact.	
Program Evaluation	Required participation if selected for DHS or third-party evaluation. Costs allowable during period of performance.	Same as FY 2024. Encouraged but not required to participate in additional evaluations after period of performance.	No change.
Reporting Requirements	Financial, programmatic, closeout, and civil rights reports required per Preparedness Grants Manual. BSIR required twice annually. Recipients must submit Emergency Communications SAFECOM compliance letter.	Same reporting requirements as FY 2024. Detailed BSIR submission requirements and SAFECOM compliance letter required.	No substantive change.
Cybersecurity Requirements	Encouraged to invest in cybersecurity projects. SLCGP recipients must complete Nationwide Cybersecurity Review (NCSR). Cybersecurity investments reviewed by	Encouraged to submit cybersecurity proposals. Cybersecurity investments reviewed by DHS/FEMA, CISA, and others.	Similar emphasis; FY 2024 includes a formal mandatory NCSR for SLCGP recipients, FY 2025 mentions encouragement but no explicit NCSR requirement stated.

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	DHS/FEMA and CISA.		
Unmanned Aircraft Systems (UAS)	Allowed; must comply with Domestic Counter-UAS National Action Plan and legal requirements. Advice of counsel recommended before deployment.	Allowed consistent with Executive Order 14305 (Restoring American Airspace Sovereignty). Recipients must comply with federal, state, and local laws and develop SOPs consistent with constitutional protections.	Updated references reflecting latest Executive Order (14305) in FY 2025. More detailed compliance instructions in FY 2025.
Immigration Enforcement & 287(g) Program	OPSG supports cooperation with CBP/USBP and ICE under 287(g). Funding for 287(g) training and operational activities allowed on case-by-case basis. OPSG subrecipients must coordinate with USBP Sector and SAA. SHSP LETPA funds can support immigration enforcement activities.	OPSG encourages participation in 287(g) coordinated with USBP. Funding for 287(g) training and operational activities allowed case-by-case. SHSP includes a new NPA for Supporting Border Crisis Response and Enforcement requiring at least 10% allocation, including 287(g) related activities coordinated with ICE. OPSG 287(g) activities do not count toward the SHSP 10% minimum NPA allocation.	FY 2025 formalizes border crisis response and enforcement as an NPA with a 10% minimum spend requirement under SHSP, distinct from OPSG funding. More detailed coordination and compliance guidance.

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UASI Program	Included with \$553.5M allocation. Focused on high-threat urban areas. THIRA/SPR required. Investment Justifications for National Priority Areas required.	Not included in FY 2025 NOFO.	UASI program removed from FY 2025.
Program Category	Preparedness: Community Security	Same	No change.
Authorizing Authority	Section 2002 of Homeland Security Act of 2002 (6 U.S.C. § 603)	Same	No change.
Appropriation Authority	Department of Homeland Security Appropriations Act, 2024, Pub. L. No. 118-47, Title III	Full-Year Continuing Appropriations and Extensions Act, 2025, Pub. L. No. 119-4, § 1101	Updated appropriation act based on fiscal year.
Program Overview and Priorities	Emphasis on information sharing, collaboration, combating domestic violent extremism, cybersecurity, community preparedness, and election security. OPSG uniquely focused on border security with information sharing and intelligence cooperation priority.	Emphasis on five NPAs with a new focus on border crisis response and enforcement support. Continuation of election security, cybersecurity, and soft target protection priorities. Homeland Security Task Forces and Fusion Centers support included. OPSG retains focus	Some shifts in priority areas reflecting evolving threats and policy priorities. Border crisis response elevated to NPA in FY 2025. Domestic violent extremism priority not explicitly listed in FY 2025 NPAs.

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		on border security and cooperation with CBP/USBP and ICE/287(g).	

Summary of Key Differences:

- **UASI Program:** Present in FY 2024, absent in FY 2025.
- **Total Funding:** FY 2025 funding reduced due to removal of UASI.
- **National Priority Areas:** FY 2025 consolidates and modifies NPAs, adds "Supporting Border Crisis Response and Enforcement" with 10% minimum allocation.
- **Immigration Enforcement:** FY 2025 formalizes border crisis response as an NPA with minimum spending requirement.
- **Application and Reporting:** More detailed requirements for SAC Charter, clear labeling of LETPA and NPA investments, and Operations Orders for OPSG in FY 2025.
- **Construction and Renovation:** OPSG prohibits construction in FY 2025.
- **Operational Overtime:** Policies largely consistent with minor clarifications.
- **Program Structure:** FY 2025 focuses on SHSP and OPSG only; FY 2024 includes UASI.
- **Regulatory Citations:** Updated to reflect current fiscal year laws and executive orders (e.g., EO 14305 for UAS).