

## FY25 EMERGENCY MANAGEMENT PERFORMANCE GRANT NOFO CHANGES SUMMARY

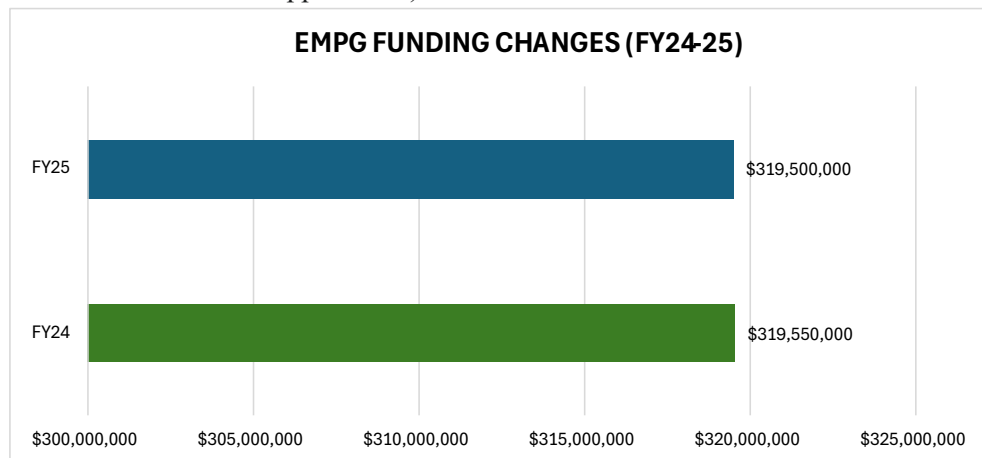
The FY25 Emergency Management Performance Grant (EMPG) Program Notice of Funding Opportunity (NOFO) introduces several key updates compared to the FY24 NOFO. The total available funding has seen a **minor decrease from \$319,550,000 to \$319,500,000**. The application timeline has also been adjusted, with the Application End Date on August 11, 2025, reflecting a shorter application window. Another significant change is the removal of "Equity" as a standalone national priority, integrating its considerations implicitly within the broader "Extreme Weather Resilience" and "Readiness" priorities. The "Climate Resilience" priority from 2024 has been rephrased to "Extreme Weather Resilience" in 2025.

New requirements for sub-applicants include vetting for foreign nationals/noncitizens and the submission of short biographies and resumes for personnel, partners, and other parties. Additionally, the National Qualification System implementation objectives have advanced to Phase 3 for FY25, requiring more robust progress from recipients. Performance measures have been refined with specific percentage targets for various capability-building projects.

### DETAILED OVERVIEW OF CHANGES:

#### Total Available Funding and Program Structure:

- **FY24:** Total funding was \$319,550,000 (plus \$50,000 from the DRF for Republic of the Marshall Islands).
- **FY25:** Total funding is \$319,500,000—a slight decrease in overall announced funding. The specific mention of additional funds for the Republic of the Marshall Islands is removed from this section, though it's still listed in the allocation table in Appendix D).



#### National Priorities:

- **FY24:** Equity, Climate Resilience, and Readiness. Explicitly required at least one project to exclusively focus on addressing equity considerations.
- **FY25:** Extreme Weather Resilience and Readiness. The explicit "Equity" national priority is removed, and its considerations are implicitly integrated into the other priorities. "Climate Resilience" is rephrased as "Extreme Weather Resilience."

#### Sub-applicant Eligibility / Requirements for Personnel, Partners, and Other Parties:

- **FY24:** No explicit mention of vetting foreign nationals or submitting bios/resumes for sub-applicants.
- **FY25:** Introduces new requirements: 1) sub-applicants should not have foreign nationals or noncitizens included (if they do, they must be properly vetted and adhere to "staff American, stay in America" and



security requirements); and 2) sub-applicants/sub-recipients must submit short biographies and resumes, which are subject to approval.

#### **National Qualification System (NQS) Implementation:**

- **FY24:** Required recipients and sub-recipients in 50 states and DC to work toward achieving Phase 2 NQS objectives and execute their Phase 1 Implementation Plan. Other jurisdictions were required to develop an Implementation Plan.
- **FY25:** All recipients and sub-recipients in 50 states and DC must work toward achieving **Phase 3 NQS implementation objectives**. This includes executing and Implementation Plan, issuing PTBs to designated personnel, and ensuring progress toward task endorsements and minimum training requirements.

#### **Pre-Award Costs:**

- **FY24:** Allowable only with prior written approval from DHS/FEMA and inclusion in the award agreement.
- **FY25:** Pre-award costs are explicitly stated as **"not allowed."**

#### **Performance Measures and Targets:**

- **FY24:** Listed five performance measures without specific percentage targets.
- **FY25:** Lists five performance measures with **specific percentage targets**:
  1. Percentage of capability-building projects that align to capability gaps identified by states, territories, and urban areas in their THIRA/SPR submissions **(50%)**.
  2. Percentage of high priority capabilities, as identified in THIRA/SPR submissions, that are built or sustained prior to award closeout **(50%)**.
  3. Percentage of capability-building projects that address a high priority core capability as identified by THIRA/SPR submissions **(50%)**.
  4. Percentage of projects that build or sustain capabilities relating to the EMPG program national priority areas and RA agreed-upon priorities **(80%)**.
  5. Percentage of planning, training, and/or exercise related projects that align with closing address capability gaps as identified in the state/territory's most recent THIRA/SPR submission, mitigation plan, AARs, audit/monitoring findings, continuity assessments, or other deliberate plans **(50%)**.

#### **Payment Information:**

- **FY24:** General information on payment requests and compliance.
- **FY25:** Adds a new bullet point under "Submission Process" for all non-disaster reimbursement requests:
  - 1) Whether the subrecipient's work or mission involves supporting aliens, regardless of whether FEMA funds support such activities; 2) whether the payment request includes an activity involving support to aliens; 3) whether the subrecipient has any diversity, equity, and inclusion practices.

#### **Immigration Conditions:**

- **FY24:** No specific section on immigration conditions.
- **FY25:** Introduces a new section on "Immigration Conditions," stating that an immigration term and condition may be material to DHS' decision to make the grant award, and non-compliance may lead to termination. A final agency decision is pending on this term and condition.

#### **EMAC Membership:**

- **FY24:** American Samoa, Republic of the Marshall Islands, and Commonwealth of the Northern Mariana Islands were not currently subject to EMAC requirements.
- **FY25:** Only American Samoa and the Commonwealth of the Northern Mariana Islands are listed as not currently subject to these requirements.