

FY25 HOMELAND SECURITY GRANT PROGRAM NOFO CHANGES SUMMARY

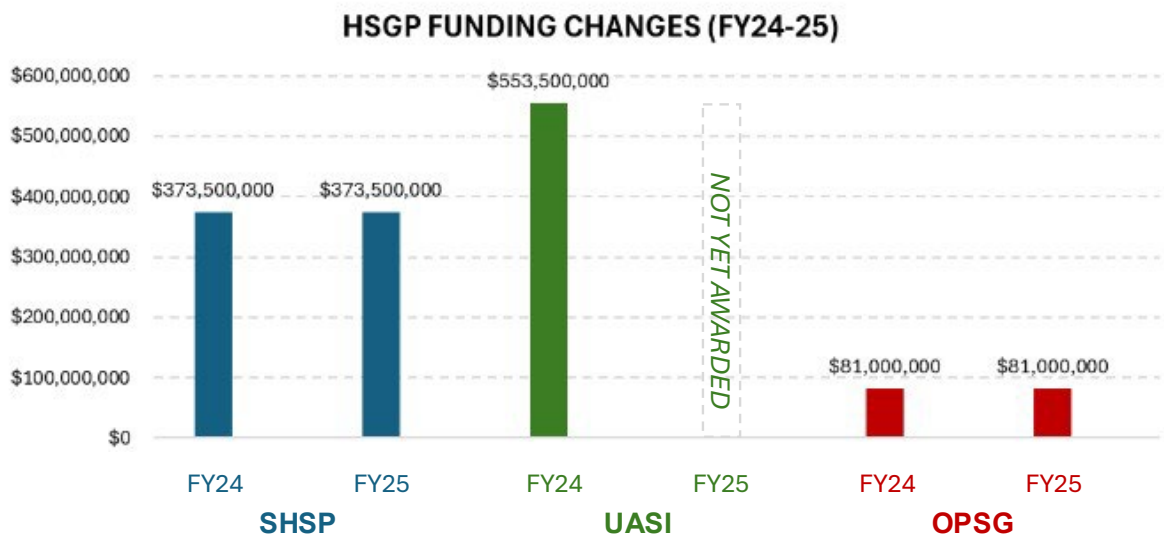
The Fiscal Year 2025 Homeland Security Grant Program (HSGP) Notice of Funding Opportunity (NOFO) introduces several significant changes compared to the FY24 version. Most notably, the **Urban Area Security Initiative (UASI) program has been removed** as a component of the HSGP, leading to a substantial decrease in total available funding. Additionally, some allowable activities previously specified for UASI have now been consolidated under the State Homeland Security Program (SHSP).

Additionally, the National Priority Areas (NPA) for SHSP have been revised, with "Enhancing Community Preparedness and Resilience" and "Combating Domestic Violent Extremism" removed as distinct priorities, and a new priority, "**Supporting Border Crisis Response and Enforcement**," added with a **10% minimum allocation**. The application period is also significantly shorter—**just two weeks**—and there are new immigration-related conditions and requirements for sub-applicants, including vetting for foreign nationals and biographies/resumes for personnel.

DETAILED OVERVIEW OF CHANGES:

Total Available Funding and Program Structure:

- **FY24:** Total funding was \$1,008,000,000, distributed across SHSP (\$373,500,000), UASI (\$553,500,000), and Operation Stonegarden (OPSG) (\$81,000,000).
- **FY25:** Total funding is \$454,500,000, distributed across SHSP (\$373,500,000) and OPSG (\$81,000,000). The **Urban Area Security Initiative (UASI) program has been removed** from HSGP for FY25, resulting in a \$553,500,000 reduction in overall funding.



SHSP National Priority Areas and Minimum Spend Requirements:

- **FY24:** Six NPAs were identified: 1) enhancing the protection of soft targets/crowded places; 2) enhancing information and intelligence sharing and analysis; 3) combating domestic violent extremism; 4) enhancing cybersecurity; 5) enhancing community preparedness and resilience; and 5) enhancing election security (3% minimum). A total of 30% of SHSP/UASI funds had to be allocated across these priorities.
- **FY25:** Five NPAs are identified: 1) enhancing the protection of soft targets and crowded places (including faith-based organizations and election sites); 2) supporting Homeland Security Task Forces (a new function



within DHS) and Fusion Centers; 3) enhancing and integrating cybersecurity resiliency; 4) enhancing election security (3% minimum); and 5) Supporting Border Crisis Response and Enforcement (10% minimum). A total of 30% of SHSP funds must be allocated across these priorities.

- **Additional Details:**

- "Combating Domestic Violent Extremism" and "Enhancing Community Preparedness and Resilience" are no longer distinct NPAs and a new NPA, **"Supporting Border Crisis Response and Enforcement,"** has been added with a **10% minimum allocation requirement**.
- "Enhancing information and intelligence sharing and analysis" has been integrated into "Supporting Homeland Security Task Forces and Fusion Centers."
- Applicants must now submit Investment Justifications (IJ) for the two NPAs with minimum spend requirements.

Law Enforcement Terrorism Prevention Activities (LETPA) Allocation:

- **FY24:** At least 35% of combined SHSP and UASI funds were required for LETPAs.
- **FY25:** The 35% LETPA allocation remains but now applies only to SHSP funds due to UASI's removal.

Eligible Entities / Subrecipient Eligibility:

- **FY24:** OPSG eligible subrecipients were divided into three Tiers (Tier 1: physical border, Tier 2: contiguous to Tier 1, Tier 3: contiguous to Tier 2).
- **FY25:** OPSG subrecipient tiers remain, but the new language explicitly states: "Sub-applicants should not have foreign nationals or noncitizens included. If a sub-applicant 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."

Required Documents and Information:

- **FY24:** Required IJ for SHSP and UASI, Concept of Operations for OPSG, Operations Orders (OPSG), and Detailed Budgets.
- **FY25:** Requires FEMA GO – Web-based Summary of Grant Request Details, Senior Advisory Committee Charter and Membership / Point of Contact List (for SHSP), Operations Orders (OPSG), Detailed Budgets (web-based), Pre-Award Costs, and Indirect Cost Agreement.

SHSP Allowable Costs - Operational Overtime Categories:

- **FY24:** Listed eight categories, including "Other Related Personnel Overtime Costs" and "Operational Support to a Federal Agency."
- **FY25:** Adds a ninth category: "Response to Catastrophic Incidents that are Acts of Terrorism" for operational overtime.

Immigration Conditions (New Section):

- **FY24:** No explicit section on "Immigration Conditions."
- **FY25:** A new section outlines prohibitions and certifications related to "sanctuary jurisdictions" and cooperation with DHS/immigration officials. This includes requirements for states/territories to not be designated as sanctuary jurisdictions, prohibitions on subawards to local governments designated as sanctuary jurisdictions, and certifications under penalty of perjury for compliance with 8 U.S.C. §§ 1373 and 1644 (information sharing), prohibitions on encouraging/inducing illegal aliens, honoring cooperation requests (e.g., detainers, access to detainees), and not publicizing immigration enforcement operations.