



GRANT MANAGEMENT MEMORANDUM GMM 2025-03

Date: April 11, 2025

To: All California Governor's Office of Emergency Services (Cal OES) Homeland Security Grant Program (HSGP), Nonprofit Security Grant Program (NSGP), Emergency Operations Center Grant Program (EOCGP), Emergency Management Performance Grant (EMPG) Program and State and Local Cybersecurity Grant Program (SLCGP) Subrecipients

From: Cal OES Grants Management

Subject: **DHS/FEMA Grant Guidance Impacting HSGP, NSGP, EOCGP, EMPG, & SLCGP Subrecipients**

As you are aware, the Department of Homeland Security (DHS) and the Federal Emergency Management Agency (FEMA) have paused federal grant funding while they conduct a "manual review" of its grant programs, including pending disbursement requests for obligated grant funds. The California Governor's Office of Emergency Services (Cal OES) recognizes that this funding pause has significantly impacted the operations of many grant subrecipients, fostering uncertainty. As the state administrator of these affected grant programs in California, Cal OES wanted to provide you information about current efforts to address this funding pause, including the status of litigation brought by California and 22 other states to restore congressionally authorized funding.

Since the issuance of an Office of Management and Budget's memorandum on January 27, 2025, directing federal agencies to pause federal funding while agencies conducted a review of its federal programs, California and 22 other states have worked tirelessly to compel federal departments and agencies, including DHS and FEMA, to unfreeze grant funding.

Most recently, on April 4, 2025, the federal district court in Rhode Island issued an order to FEMA to end the "manual review" process and comply with the court's prior order that FEMA not pause or impede the disbursement of federal grant funds. That order, however, is temporarily stayed while the Rhode Island district court considers a motion brought by FEMA on April 6, 2025, asking the court to reconsider its April 4 order. The Rhode Island district court has provided the parties until April 14 to submit additional briefing.

While we are hopeful that the Rhode Island district court will issue its decision soon thereafter, we also wanted to inform you of the nature of requests made by FEMA

so that you are aware of the types of information and documentation we may need to request of you when submitting disbursement requests depending on the grant program involved. For example, recent information and documentation requests from FEMA related to disbursement requests in the EMPG and EOCGP include summaries and back up documentation related to the following categories:

- Budget, including costs categorized as “Other Costs” (including invoices supporting payment requests)
- Personnel
- Fringe Benefits
- Travel
- Equipment
- Supplies
- Contracts (including invoices supporting payment requests), and
- Indirect Cost Rate Information

We recognize the amount of effort that this will take for your organization to prepare and provide the requested information. However, we want to provide you with as much notice as possible so that you may begin to gather this information, and documentation should it be necessary. We have also made a request for relief from some of this required documentation directly to the Senior Official Performing the Duties of FEMA Administrator. We will notify you if any relief is authorized.

We understand that the federal funding pause has caused much anxiety to you and the communities you serve. Rest assured that while we await the court's decision, we will continue to actively work to submit disbursement requests while also keeping you informed of significant developments as information becomes available.

In the meantime, if you have questions regarding your grant, you can email grantsmanagement@caloes.ca.gov.

Cal OES Grants Management