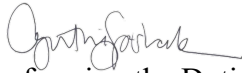




FEMA

Grant Programs Directorate Information Bulletin
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MEMORANDUM FOR: All State Administrative Agencies
All State Homeland Security Directors
All State Administrative Agency Points of Contact
All Urban Area Security Initiative Points of Contact
FEMA Regional Administrators

FROM: Cynthia Spishak 
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Resilience

SUBJECT: **Fiscal Year 2026 Election Security Guidance**

I. Purpose

The purpose of this Information Bulletin is to provide additional clarity to the Fiscal Year (FY) 2026 Homeland Security Grant Program (HSGP) Notice of Funding Opportunity (NOFO).

II. Applicability

This IB is only applicable to the FY 2026 HSGP NOFO, specifically the election security requirements.

III. Overview

To receive full grant funding, each state must submit evidence of compliance with the following five election security requirements.

- Submit a plan to transition from barcode and QR code based tabulation to handmarked paper ballot tabulation.
- Conduct a postelection 5% manual audit of paper ballots and compare it to electronic voting system results.
- Confirm voter and ballot reconciliation.

- Verify the citizenship of all registered voters using the SAVE¹ system or another authorized government system.
- Ensure that all individuals administering elections are United States citizens.

If current state procedures meet or exceed any of the requirements set forth in these guidelines, the chief election official may submit an attestation of current processes along with an explanation of each requirement met.

For each state and high-risk urban area, FEMA will withhold from drawdown an amount equal to 20% of the recipient's total HSGP award. This includes awards under the State Homeland Security Program, the Urban Area Security Initiative and Operation Stonegarden. FEMA will continue to withhold these funds until the recipient submits proof of compliance with these requirements and the Department verifies that proof. Meeting the % election security minimum investment required elsewhere in the FY 2026 HSGP NOFO does not, by itself, release this 20% holdback, which applies to funds beyond the 3% set-aside. This condition applies at the recipient level; FEMA does not apply it subrecipient by subrecipient.

Application of the holdback across programs.

The 20% is calculated against the recipient's total HSGP award. The recipient determines which program account the withheld amount is drawn from and may concentrate it in one or more programs rather than spreading it evenly, provided that the total amount withheld equals 20% of the total HSGP award and that all other program requirements continue to be met. In allocating the withheld amount, a recipient may not impair its pass-through obligations to local and tribal units of government or place a disproportionate share on a high-risk urban area without that urban area's concurrence and may not withhold amounts committed to Operation Stonegarden operations addressed in an approved Operations Order. Recipients should document their allocation and provide it to the assigned FEMA Preparedness Officer. The full withheld amount is released at once upon the Department of Homeland Security's verification of the recipient's proof of compliance, regardless of how the recipient allocated it.

The holdback affects the timing of access to funds, not the amount of the award. No portion of the award is deobligated or reduced by operation of this condition, and the withheld amount remains available to the recipient upon verified compliance, subject to the period of performance.

IV. Guidance

A. Submit a Plan to Transition from Barcode/QR Code Tabulation to HandMarked Paper Ballot Tabulation

¹ Where the functionality of SAVE is impacted by the June 22, 2026, order in **League of Women Voters v. DHS**, Civ. Action No. 25-3501, while on appeal, treat the following as controlling:

For any person registered to vote for whom the state does not have records of citizenship, the state may resolve this uncertainty by submitting relevant information to USCIS for an immigration records search consistent with 8 U.S.C. § 1373.

Submit a plan to transition from electronic voting systems that use bar codes or QR codes to count votes to systems that tabulate hand-marked paper ballots. For every jurisdiction currently using barcode or QR code based tabulation, the plan must:

- Identify which counties or local jurisdictions use systems that count votes from barcodes or QR codes and provide the approximate number of precincts using such systems.
- Describe the equipment, replacement voting system or configuration that will tabulate directly from voter-verifiable, human readable, hand-marked paper ballots. Explain which components of the jurisdiction(s) systems will need to be updated or replaced.
- Ensure that Americans with Disabilities Act (ADA) compliant ballot marking devices are still available for disabled voters.
- Present a schedule for phasing out barcode or QR code based tabulation, including key milestones such as procurement and deployment, if necessary. Indicate the target election by which all affected jurisdictions will be using handmarked paper ballots.
- Provide an estimate of the total cost of the plan for all applicable jurisdictions within the state, covering equipment, software, training, testing, deployment, storage.

Evidence of Compliance: The chief election official of the state must submit a copy of the plan described above.

Submission deadline: The transition plan is due within 120 days of accepting the FY 2026 HSGP award, consistent with the deadline for voter roll citizenship verification in Section 4.D of the FY 2026 HSGP NOFO.

B. Manual Post-Election Audit

The chief election official of the state must ensure that each election jurisdiction (county or municipality) conducts a post-election manual audit of the paper ballots in at least 5% of the precincts in each jurisdiction, and at least 5% of all of the centrally tabulated batches in each jurisdiction.

- All ballots from each randomly selected precinct and from each randomly selected batch must be manually counted.
- The random selection must include ballots from all methods of voting, including Election Day in-person, early in-person, vote by mail or absentee, and provisional ballots.
- At a minimum, the audit must include at least two races with at least one race for federal office.
- Each jurisdiction must ensure that the electronic voting system accurately counted votes and that the audit is completed in time for results to inform certification decisions, when consistent with applicable law.

Random Selection: States should adopt a transparent random selection method which could include among other methods, a physical container with numbered slips, or balls drawn at random. Election officials must continue selecting units until at least 5% of precincts and 5% of centrally tabulated batches are included from each jurisdiction.

Transparency: To support public confidence, conduct the selection and post-election manual count with bipartisan observers present, and where feasible, provide livestream or recorded video where consistent with applicable law.

Manual Counting Procedures: States should ensure that each jurisdiction uses bipartisan counting teams and standardized tally sheets unless otherwise specified by state law. Each jurisdiction should also adhere to clear voter intent rules consistent with applicable laws such as how to treat ambiguous marks, overvotes, and undervotes.

Discrepancy Management: Before the election, states must define when differences between manual and machine counts will trigger action. Apply thresholds uniformly across jurisdictions. Record all discrepancies, investigations, and corrective actions. Where audit results change reported vote totals, ensure the canvass is amended consistent with state law.

Audit Timeline: Unless state law mandates post-certification audits, jurisdictions should conduct the audit after completion of the unofficial canvass, including late-arriving, vote by mail, and provisional ballots. Complete the audit before certification of election results, where permissible.

Evidence of Compliance: The chief election official must submit an attestation confirming that each jurisdiction in the state conducted a 5% manual audit as described above, the number of races counted, the method of random selection, the manual counting process used, whether discrepancies existed, the nature of any discrepancies, and how discrepancies were resolved.

C. Voter and Ballot Reconciliation

Each election jurisdiction must reconcile the number of voters who voted in each federal election with the number of ballots cast. After all ballots have been cast in a federal election, each jurisdiction must create a static list of each voter who participated in the election. The list must include the name, unique voter ID number, and the method of voting for each voter who participated in the election. The method of voting must include all methods of voting in the state, such as Election Day in-person, provisional, absentee or mail, early voting and whether the voter's ballot was counted.

This list is a jurisdiction record. It is retained locally by the election jurisdiction and is not submitted to FEMA. The evidence of compliance below is the certification and the checklist figures, not the underlying voter list itself.

- The number of voters who voted must be equal to or greater than the number of ballots cast and counted for each method of voting.
- If the number of ballots exceeds the number of voters for any method of voting, the election official(s) in that jurisdiction should document and attempt to resolve the discrepancy.
- The records of this reconciliation should be retained for at least 22 months as required under federal law or longer if required by state law.

Evidence of Compliance: The chief election official must certify that the static lists of voters were compared with the ballots cast and counted by each vote method and that all discrepancies have been documented and resolved where possible. The certification checklist will include total number of voters who participated, total number of voters who successfully had a ballot counted, total number of ballots cast, and total number of ballots rejected. If the state's current procedures meet or exceed those required under the NOFO, details of compliance.

D. Voter Roll Citizenship Verification

Each state must use the U.S. Citizenship and Immigration Services' (USCIS) Systematic Alien Verification for Entitlements (SAVE¹) system to verify the citizenship of all individuals in the state voter registration database within 120 days of accepting the grant award.

The Process: States must sign the SAVE memorandum of understanding/agreement (MOU/MOA), query SAVE¹ or authorized DHS systems, and act on verified non-U.S. citizen records by taking timely corrective action consistent with applicable law.

For identifying deceased registrants specifically, states may use the Social Security Administration's Death Master File, which the Social Security Administration manages, given that SAVE's collection of Social Security numbers has been affected by court order.

Alternate Process (Pending Appeal of Civ. Action No. 253501): Provide a list of registered voters with unknown citizenship status to be reviewed by USCIS before the election.

Evidence of Compliance: The chief election official must certify that a SAVE MOU/MOA has been signed, provide a count of total transactions submitted to SAVE, and a count of the total registered voters in the state. If the state has already signed the MOU/MOA and processed all current files, indicate this on the attestation and provide the information required as evidence of compliance.

E. Election Worker Citizenship Verification

Each jurisdiction must verify U.S. citizenship for any person who works at a polling place; or who operates any election system in the jurisdiction, including temporary

agency workers and vendors who work on or with election systems, through existing or new state processes, or, where a legal requirement or authorization exists under applicable state law, through SAVE or another authorized government system. To prevent sabotage, infiltration or foreign interference, the state's chief election official must ensure that only verified U.S. citizens are administering U.S. elections.

Evidence of Compliance: The chief election official of the state must attest that all jurisdictions satisfied this citizenship verification requirement, identifying how this verification was made - whether through an explanation of existing state laws or procedures that effectively fulfill this requirement, or through another method. If vendors or temporary workers are used in any jurisdiction, provide confirmation that the relevant contracts require citizenship verification.

V. Questions

Questions regarding this IB may be directed at the Grant Programs Directorate at fema-gpd-grantprograms@fema.dhs.gov.

VI. Review Date

This IB will be reviewed, updated or rescinded as needed.