



FEMA

**Grant Programs Directorate Information Bulletin
No. 569a
August 12, 2026**

MEMORANDUM FOR: All State Administrative Agency Heads
All Tribal Homeland Security Grant Program Recipients
All State Administrative Agency Points of Contact
All Urban Area Security Initiative Points of Contact
All State Homeland Security Directors

FROM: Pamela S. Williams *P.S. Williams*
Deputy Assistant Administrator (Acting)
Grant Programs Directorate

SUBJECT: **Homeland Security Grant Program Border Security and
Election Security National Priority Area Requirements
and Compliance Vetting Process – Updated**

I. Purpose

This Information Bulletin (IB) serves three purposes:

- **Border Security National Priority Area Clarification:** Clarifies activities eligible under the existing Supporting Border Crisis Response and Enforcement National Priority Area (NPA) for the Fiscal Year (FY) 2025 Homeland Security Grant Program (HSGP).
- **Election Security National Priority Area Update:** Establishes updated compliance requirements for the FY 2025 Election Security NPA and outlines actions that the Federal Emergency Management Agency (FEMA) will take to ensure State Administrative Agencies (SAAs) and subrecipients efficiently and effectively meet those requirements.
- **Compliance Verification Attachments:** Transmits the FY 2025 Election Security Compliance Guidance for SAAs, consisting of Appendix A (Election Security Self-Verification Checklist), Appendix C (Template Letter from State Administrative Agency to Subrecipient), and Appendix D (Summary Compliance Letter Template from State Administrative Agency to FEMA), which support verification of compliance and release of held funds.), which support verification of compliance and release of held funds. The checklist and templates have been submitted through the Paperwork Reduction Act (PRA)

approval process and will be shared with the SAAs upon approval. In the interim, SAAs may use the currently provided templates voluntarily, as appropriate.

This updated IB supersedes the June 8, 2026, version of IB No. 569. It incorporates the published Systematic Alien Verification for Entitlements) and clarification footnote, resolves reviewer input from FEMA and United States Citizenship and Immigration Services (USCIS), and makes the editorial corrections listed in the Summary of Updates.

II. Applicability

This IB clarifies and updates requirements for the Supporting Border Crisis Response and Enforcement and Election Security NPAs in the FY 2025 HSGP. The border security clarification restates existing eligibility and applies to the FY 2025 HSGP and any future Notices of Funding Opportunity. The election security updates in this IB apply to the FY 2025 HSGP only and do not amend the FY 2026 HSGP NOFO, including the FY 2026 Election Security NPA requirements and the associated 20 percent withholding, which are addressed separately.

III. Guidance

A. Supporting Border Crisis Response and Enforcement National Priority Area (*No Change in Requirements*)

The requirements for this NPA are unchanged from the FY 2025 HSGP Notice of Funding Opportunity (NOFO). This IB does not impose any new obligations with respect to the Supporting Border Crisis Response and Enforcement NPA. It confirms eligible activities to help SAAs and subrecipients expend funds with confidence.

Each SAA must allocate at least 10 percent of total combined State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI) funds to this NPA, with at least one supporting investment. The associated core capabilities are risk management for protection programs and activities, operational coordination, and community resilience. FEMA recommends that SAAs coordinate with U.S. Immigration and Customs Enforcement (ICE) on all projects under this NPA, as appropriate. All investments are reviewed by FEMA to ensure effectiveness, legality, and alignment with program goals.

Eligible Activities

As stated in the NOFO, projects may include, but are not limited to:

- Participation in the ICE 287(g) program, allowing trained local officers to support ICE with immigration enforcement;
- Cooperation with ICE detainees and other jurisdictional responsibilities related to immigration enforcement;
- Other jurisdictional responsibilities to support the enforcement of United States immigration law; and,
- Supportive activities such as officer training, technology and information sharing, operational support, and community engagement.

Eligibility and Coordination Notes

- ICE 287(g) activities funded under Operation Stonegarden (OPSG) are encouraged, but

do not satisfy the 10 percent minimum allocation required for this NPA under SHSP and UASI.

- U.S. Customs and Border Protection (CBP) is the lead federal entity for OPSG eligibility, operational priorities, and coordination. Any use of 287(g) as part of OPSG eligibility must be developed in close coordination with CBP and reflect their operational assessments.
- Management and administration (M&A) allocated under State Homeland Security Program (SHSP) for administering OPSG may be applied toward meeting this NPA's spending requirement, consistent with the NOFO.

FEMA may coordinate with ICE and CBP subject matter experts when reviewing proposed projects. Any such input is integrated into the existing HSGP NPA project review process. FEMA retains sole project approval authority.

B. Election Security National Priority Area (*Updated Requirements*)

To strengthen election integrity consistent with Executive Order 14248, *Preserving and Protecting the Integrity of American Elections*, Section 4(d), FEMA provides the following supplemental guidance. Election Security portion of the SHSP and UASI Funding Priorities and Requirements subsection of the FY 2025 HSGP NOFO. The guidance has been updated as set forth below:

Eligible Activities

Department of Homeland Security (DHS) has designated election infrastructure as critical infrastructure. Voter list maintenance and election worker verification are necessary to protect voting systems. By reducing vulnerabilities in voter registration data and election-system access, these requirements assist recipients in achieving target capabilities (including cybersecurity, physical protective measures, and risk management) related to preventing, preparing for, protecting against, and responding to acts of terrorism.

Recipients are encouraged to design FY 2025 HSGP projects to focus on compliance, particularly with federal recommendations for election security and the use of equipment certified to the Voluntary Voting System Guidelines (VVSG) 2.0 standards. These projects must meet or exceed the three percent minimum spend for election security and demonstrate alignment with FEMA program goals.

Eligible activities include (but are not limited to):

- Election system upgrades to VVSG 2.0–certified systems;
- Voter verification using the U.S. Citizenship and Immigration Services (USCIS); Systematic Alien Verification for Entitlements (SAVE) program;¹
- Cybersecurity assessments and remediation aligned with federal directives;
- Physical security enhancements (access controls, monitoring) for election sites;

¹ To the extent that the functionality of the Systematic Alien Verification for Entitlements (SAVE) system has been impacted by the June 22, 2026 order in the *League of Women Voters v. U.S. Department of Homeland Security*, Civ. Action No. 25-3501, while on appeal, for any person who is registered to vote but for whom a state does not have records of citizenship, the state may resolve this uncertainty by submitting relevant information to United States Citizenship and Immigration Services for an immigration records search consistent with the requirements of 8 U.S.C. § 1373.

- Poll worker and staff training, including incident response, chain of custody, and data privacy;
- Secure data management and encryption for storage and transmission;
- Multi-factor authentication and access controls for sensitive systems;
- Incident response and continuity of operations planning;
- Vulnerability scanning and penetration testing with documented remediation; and,
- Election worker eligibility verification to confirm the U.S. citizenship of anyone working on election administration or with election systems in any capacity through new or existing processes that a state has, or through a system such as SAVE or another authorized government system.²

Requirements

1. Continuation of the Three Percent Minimum Spend:

The three percent minimum spend requirement for election security continues in FY 2025 HSGP. Each SAA must make at least one investment supporting enhancements to election administration and physical and/or cyber election security, with a nexus to preventing, preparing for, protecting against, and responding to acts of terrorism. The three percent is calculated against the combined SHSP and UASI award.

Subrecipients are not required to individually meet the three percent threshold. The SAA, as prime recipient, is responsible for meeting or exceeding the cumulative requirement.

2. Integration of Executive Order 14248:

Executive Order 14248, *Preserving and Protecting the Integrity of American Elections*, Section 4(d), is directly referenced in the Election Security NPA in the FY 2025 HSGP NOFO. This Executive Order increases the emphasis on election integrity, transparency, and resilience — all of which support the terrorism-preparedness purpose of the HSGP.

3. Certifiable Compliance Conditions:

The fourth paragraph under the “Election Security (3% minimum allocation)” header on page 17 of the FY 2025 HSGP NOFO is revised as follows:

“To further strengthen election integrity, jurisdictions can demonstrate compliance by meeting the 3 percent investment minimum and following certifiable conditions:

Voter verification: Become a participant in the SAVE program and process the state voter list through SAVE to the fullest possible extent to identify potentially ineligible registrants;³

- **Election worker eligibility verification:** Use existing or develop new state processes to verify that anyone working at a polling place or on election administration in any capacity is a U.S. citizen and support local election jurisdiction use of available services for verifying U.S. citizenship. One example of this may be using SAVE or another authorized government system

² *Id.*

³ *Id.*

or process.⁴

Before incurring costs for election security activities, jurisdictions must certify at least one of the conditions through the process described in Requirement 5 and the attached compliance guidance.”

4. Monitoring and Reporting:

This IB does not amend the monitoring and reporting requirements of the FY 2025 HSGP NOFO. If there are any updates to your projects, make sure to include them in your progress report. If nothing has changed, be sure to note this in the corresponding report through the FEMA Grants Outcome (FEMA GO) system.

- 5. Compliance Verification and Cost Incurrence:** Until FEMA has verified compliance with the requirements of this IB, recipients and subrecipients may not incur costs for election security activities under the FY 2025 HSGP, and such costs may not be charged to the award. To support verification, FEMA is transmitting with this IB the FY 2025 Election Security Compliance Guidance for State Administrative Agencies (Appendices A, C, D). Appendix B is not included, as this is an internal template for FEMA. The checklist and templates are administrative tools recommended by the Grant Programs Directorate to facilitate verification; they do not impose requirements beyond the terms of the grant award. SAAs should collect subrecipient checklists or alternative compliance certifications and submit a summary certification to FEMA on official letterhead by February 28, 2027. Upon FEMA review and approval of the summary certification, recipients and subrecipients may begin incurring costs for election security activities.

SAAs that have already submitted certifications to FEMA do not need to resubmit. FEMA will review the prior submission and contact the SAA if follow-up information or clarification is needed. Upon FEMA review and approval of an SAA’s summary certification, recipients and subrecipients may begin incurring costs for election security activities.

IV. Questions

Questions regarding this IB may be directed to fema-gpd-grantprograms@fema.dhs.gov.

Attachments: FY 2025 Election Security Compliance Guidance for State Administrative Agencies, Appendices A, C, and D.

⁴ *Id.*

Appendix A: Fiscal Year 2025 Election Security Self-Verification Checklist

This checklist provides instructions for subrecipients, compliance requirements, and certification signatures and dates.

Instructions for Subrecipients

All entities receiving Fiscal Year (FY) 2025 Homeland Security Grant Program funds are asked to complete this checklist as the Grant Programs Directorate's recommended method to verify and document their compliance with the election security requirements stated in the NOFO and [IB 569a](#). The checklist itself, and the submission deadlines in this appendix, are administrative tools established by FEMA to facilitate compliance verification and the incremental release of held funds—not separate requirements found in the terms of the grant award.

Key Deadlines and Funding Release Process

These dates represent a tentative, target timeline. State Administrative Agencies may adapt the schedule to meet their operational needs, and additional time may be taken as necessary.

- **Checklist Completion by Subrecipients:** State Administrative Agencies should compile all subrecipient checklists and/or alternative compliance certification and submit a **summary certification** to FEMA/DHS. State Administrative Agencies will establish specific deadlines for subrecipients to submit compliance documentation in order to remove the funding hold in a timely manner. Their subrecipients must complete the checklist or some form of alternative certification, affirm compliance, and confirm that supporting documentation is available. Completed subrecipient checklists should be returned to the State Administrative Agency by date established by the State Administrative Agency that allows timely submission of the summary certification to FEMA by **February 28, 2027**.
- **Summary Certification Submission:** State Administrative Agencies are strongly encouraged to compile all completed checklists from subrecipients and submit a summary certification to FEMA (see Appendix D) by **February 28, 2027**, on official letterhead.
 - **Funding Release:** Until FEMA has verified compliance with the requirements of IB 569a, recipients and subrecipients may not incur costs for election security activities, and such costs may not be charged to the award. Upon FEMA review and approval of the summary certification, recipients and subrecipients may begin incurring costs for election security activities.

Election Security Self-Verification Checklist

Compliance Overview

Instructions: Please check each applicable box to certify compliance with the guidance issued in IB 569a and the Fiscal Year 2025 Homeland Security Grant Program Notice of Funding Opportunity.

We have read the guidance issued in IB 569a regarding the following updates:

- ☐ **Election Security Investment:** We have invested at least 3% of the State Homeland Security Program/Urban Area Security Initiative award in eligible election security activities.

- ☐ **Voter Verification:** We participate in the United States Citizenship and Immigration Services Systematic Alien Verification for Entitlements (SAVE) program and have processed the state voter list through SAVE to the fullest possible extent to identify potentially ineligible registrants.
- ☐ **Election Worker Eligibility Verification:** We have used existing or new state processes to verify that anyone working at a polling place or on election administration in any capacity is a U.S. citizen, and we support local election jurisdiction use of available services for verifying U.S. citizenship, such as the SAVE program or another authorized government system or process.

Record Retention: We are retaining all supporting records and documentation and will make them available to FEMA/DHS upon request or during audit.

Certification

By signing below, I certify that the above statements are true and correct to the best of my knowledge, that supporting documentation is on file, and that we are maintaining compliance in accordance with the Fiscal Year 2025 Homeland Security Grant Program Notice of Funding Opportunity, as updated by IB 569a.

Name: _____

Title: _____

Agency: _____

Date: _____

Appendix B: Internal FEMA template. Not included.

This page is intentionally left blank.

Appendix C: Template Letter from State Administrative Agency to Subrecipient

This draft template is for State Administrative Agencies to send to subrecipients to provide information on checklist submission. The letter should outline contents of the checklists and information about documentation retention.

Subject: Action Required: FY25 Election Security Compliance Checklist Submission

Dear [Subrecipient Name],

As part of the Fiscal Year (FY) 2025 Homeland Security Grant Program (HSGP), all recipients must submit election security projects totaling at least 3% of the award amount. To demonstrate election security compliance, recipients are asked to complete the attached Election Security Self-Verification Checklist. Because your organization's FY 2025 HSGP subaward includes an election security component, submitting this checklist [or alternative compliance certification] is needed to assist us in certifying compliance with federal requirements.

Completion and submission of this checklist is the Grant Programs Directorate's recommended method for verifying and documenting compliance with the election security requirements outlined in the Notice of Funding Opportunity and [IB 569a](#). Please note that the checklist and the submission deadlines referenced in this email are administrative tools established by FEMA to facilitate compliance verification and the incremental release of held funds. They are not separate requirements beyond those contained in the terms of the grant award.

To ensure compliance at the subrecipient level, please complete the following steps:

1. **Complete the attached checklist or provide alternative certification:** Provide full and accurate responses certifying compliance with the FY 2025 election security requirements, as updated in IB 569a.
2. **Review the IB 569a language revising the Notice of Funding Opportunity:** IB 569a revises the fourth paragraph under the "Election Security (3% minimum allocation)" header on page 17 of the FY 2025 HSGP funding notice to state:

"To further strengthen election integrity, jurisdictions can demonstrate compliance by meeting the 3% investment minimum and following certifiable conditions:

 - **Voter list maintenance:** Participate in the SAVE program and process the state voter list through SAVE to the fullest possible extent to identify potentially ineligible registrants.
 - **Election worker eligibility verification:** Use existing or develop new state processes state processes to verify that anyone working at a polling place or on election administration in any capacity is a U.S. citizen and support local election jurisdiction use of available services for verifying U.S. citizenship. One example of this may be using SAVE or another authorized government system or process."
3. **Submit the completed checklist:** Return the completed checklist to [State Administrative Agency Contact/Email] no later than [TBD].

Important Funding Information

Please note that funds associated with election security activities cannot be incurred or reimbursed until FEMA verifies compliance. Submitting your checklist is necessary to confirm compliance and enable the release of these funds once FEMA reviews and approves the State Administrative Agency's certification package.

Documentation Retention

At this time, State Administrative Agencies are not required to submit supporting documentation to FEMA. However, all records verifying compliance must be retained and made available upon request during monitoring, audit or inspection.

Your cooperation is critical to ensure that the state remains compliant with federal election security requirements.

Thank you for your prompt attention to this matter. If you have any questions about the checklist or submission process, please contact: [State Administrative Agency Point of Contact Name, Title, Phone, Email].

Sincerely,

[Title]

[State Administrative Agency]

Appendix D: Summary Compliance Letter Template from State Administrative Agency to FEMA

This draft template is for State Administrative Agencies to submit to FEMA/DHS after collecting all subrecipient certifications and verifying compliance with Fiscal Year 2025 election security requirements. Submit the compliance letter on official agency letterhead.

Dear [Preparedness Officer Name],

The [State Administrative Agency Name] hereby certifies compliance with all applicable election security requirements stated in the Fiscal Year (FY) 2025 Homeland Security Grant Program (HSGP) Notice of Funding Opportunity (NOFO).

Certification Statement

As the prime recipient, we have invested at least 3% of the total Fiscal Year 2025 State Homeland Security Program and Urban Area Security Initiative award in eligible election security activities. Subrecipients are not required to meet the 3% threshold for subawards. The State Administrative Agency is responsible for meeting or exceeding the cumulative requirement.

- Per the guidance issued in [IB 569a](#), the Fiscal Year 2025 election security requirements have been updated to the following certifiable conditions, at least one of which must be met and certified before costs for election security can be incurred:
 - **Voter list maintenance:** Sign the SAVE Memorandum of Agreement and process the full state voter list through the SAVE system to identify deceased and non-citizen registrants.
 - **Voter verification:** Participate in the SAVE program and process the state voter list through SAVE to the fullest possible extent to identify potentially ineligible registrants.
 - **Election worker eligibility verification:** Use existing or develop new state processes to verify that anyone working at a polling place or on election administration in any capacity is a U.S. citizen, and support local election jurisdiction use of available services for verifying U.S. citizenship. One example of this may be using SAVE or another authorized government system or process.

Documentation and Reporting

All required supporting documentation is retained by subrecipients and will be produced promptly upon request.

Authorized Certification and Request

I, the undersigned, certify on behalf of the [State Administrative Agency] that the FY 2025 election security requirements, as updated by IB 569a, have been met and properly documented, and that all relevant supporting records are maintained in accordance with federal requirements. We respectfully request the release of the associated funding hold upon FEMA verification.

We respectfully request FEMA review and approval of this summary certification so that costs for election security activities may be incurred.

Sincerely,

[Authorized Official Name]

[Title]

[State Administrative Agency]

[Signature Block]