

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

Civil Action No. 1:25-cv-39 (JJM)

DONALD TRUMP, IN HIS OFFICIAL
CAPACITY AS PRESIDENT OF THE
UNITED STATES, *et al.*,

Defendants.

**DEFENDANTS' OPPOSITION TO PLAINTIFFS' RENEWED SECOND
MOTION TO ENFORCE REGARDING FEMA FUNDING**

As explained in connection with Defendants' prior Status Report and accompanying declaration, *see* ECF No. 166, the Federal Emergency Management Agency ("FEMA") is currently complying with the Court's preliminary injunction. With the exception of a small number of programs not at issue here, FEMA has not implemented any "freezes" on funding awarded to the Plaintiff States.

Plaintiffs have nonetheless renewed their motion to enforce the preliminary injunction, claiming that FEMA has implemented a manual review process that is improperly delaying their payments. *See* ECF No. 168 ("Pls.' Mot."). The Court's preliminary injunction, however, does not regulate agencies' timing for reviewing and approving grant payments; it prohibits agencies from *freezing* grant payments. Specifically, the Court's Order prohibits implementation of "the OMB Directive" and other "categorical pause[s] or freeze[s] of funding[.]" PI Order (ECF No. 161) at 44. But FEMA's manual review process has nothing to do with the OMB Directive, and

is expressly *not* a pause or freeze on funding—it is instead a change to the manner in which FEMA processes and *approves* payment requests. FEMA intends to make appropriate payments under the relevant grants, which forecloses Plaintiffs’ allegations of a continued “pause” or “freeze.”

More generally, this Court should decline to entertain Plaintiffs’ grant-specific compliance disputes. Allowing Plaintiffs to bring an enforcement motion each time they are unhappy with the pace of disbursement for grants administered by any of the twenty-three agencies regulated by the preliminary injunction would turn this Court into an overseer of countless federal funding streams, displacing the remedies available under each individual funding agreement. In a case that Plaintiffs have previously characterized as being about “categorical freezes,” the Court should not entertain compliance disputes based on the timing of particular payment requests under individualized grant agreements.

In any event, even setting aside the above defects, FEMA continues to work to implement its manual review process and process payments as quickly as possible, as discussed further in the attached declaration. *See* 3d Hamilton Decl. (attached hereto). Thus, the Court should deny Plaintiffs’ motion and decline to provide further relief. To the extent the Court disagrees, however, any relief should be substantially more limited and specific than what Plaintiffs request.

I. The Court Should Not Allow Plaintiffs to Convert Grant-Specific Disputes Into Matters of Compliance or Contempt

At the outset, this Court should reject Plaintiffs’ invitation to become an overseer of each and every grant-specific dispute involving any of the twenty-three

federal agencies subject to the Court’s preliminary injunction. Doing so would displace the specific remedies available under those funding agreements, and would convert ordinary breach-of-contract or other funding agreement disputes into potential violations of a court order. Plaintiffs should instead be directed to pursue their disputes through existing mechanisms for addressing grant-related claims.

For example, depending on the specific terms and conditions of the relevant grant agreements at issue here, Plaintiffs may have remedies available through contract actions in the Court of Federal Claims—which would generally foreclose relying on the Administrative Procedure Act and its waiver of sovereign immunity to provide relief. *See Perry Cap. LLC v. Mnuchin*, 864 F.3d 591, 618–19 (D.C. Cir. 2017) (“We have interpreted the Tucker Act, 28 U.S.C. § 1491(a)(1), which waives sovereign immunity for some claims ‘founded upon’ a contract and brought in the U.S. Court of Federal Claims, to ‘impliedly forbid’ contract claims against the Government from being brought in district court under the waiver in the APA.” (cleaned up)); *cf. Columbus Reg’l Hosp. v. United States*, 990 F.3d 1330, 1338 (Fed. Cir. 2021) (holding that “grant agreements [are] contracts when the standard conditions for a contract are satisfied”); *Henke v. U.S. Dep’t of Com.*, 83 F.3d 1445, 1450 (D.C. Cir. 1996) (“An NSF grant agreement includes the essential elements of a contract and establishes what would commonly be regarded as a contractual relationship between the government and the grantee.”). And even if the relevant grant agreements here are not contracts, Plaintiffs still could seek to enforce whatever rights they have through an APA suit specific to the relevant grant agreements—*i.e.*, directly challenging the

manual review process as unlawful through an independent APA suit against FEMA.

Instead, Plaintiffs have sought to bring their disputes to this Court in a compliance posture—essentially taking the view that any agency action that delays their payments and that, in Plaintiffs’ view, is unlawful is also a violation of the Court’s preliminary injunction. *See* Pls.’ Mot. at 7-9. But Defendants should not be forced to litigate individual contract or grant disputes in an enforcement (or contempt) posture. Doing so would supplant the existing remedies available to Plaintiffs for such claims, and would necessarily transform this Court into an overseer of all funding provided by the numerous Defendant agencies to the Plaintiff States. *Cf.* PI Hr’g Tr. at 55:1–7 (this Court stating that overseeing funding decisions to the Plaintiff States for two dozen agencies is “not anything I would ever do”).

Plaintiffs themselves have characterized their claims as “only targeting the limited freezes that we talked about” and “not targeting the very well trodden scope of what agencies have always done, which is act pursuant to the statutes and regulations that govern their authority and exercise whatever discretion they have under the law.” *Id.* at 26; *cf.* Am. Compl. ¶ 1 (“This action seeks declaratory and injunctive relief against the federal government’s categorical, immediate, and indefinite freeze on trillions of dollars of Congressionally authorized and appropriated federal funding (Federal Funding Freeze).”). In a case that is purportedly about a “categorical, immediate, and indefinite freeze on trillions of dollars,” *id.*, this Court should not allow its enforcement power to become a vehicle for Plaintiffs to complain about the pace of reimbursements on specific grants

involving a single agency. To the extent Plaintiffs believe that FEMA lacks statutory or regulatory authority to implement its manual review process, *see* Pls.’ Mot. at 8-9, Plaintiffs can present such claims through existing mechanisms (including other APA litigation if necessary). But this Court should not allow Plaintiffs to transform such disputes into matters involving the Court’s enforcement and potential contempt powers. *Cf. AIDS Vaccine Advoc. Coal. v. Dep’t of State*, --- F. Supp. 3d ----, 2025 WL 577516, at *2 (D.D.C. Feb. 22, 2025) (“While agency determinations based on wholly independent legal authority and justification such as the terms of particular agreements or sets of agreements, rather than deriving from a general directive to suspend aid, may be subject to some other legal challenge, whether it be under the APA, separation of powers, individual breach of contract cases, or otherwise, such determinations do not violate the present TRO.”).

II. FEMA’s Manual Review Process Complies with the Court’s Preliminary Injunction as a Matter of Law

Regardless, this Court’s preliminary injunction does not prohibit implementation of FEMA’s manual review process for two independent reasons. First, the manual review process is not a “pause” or “freeze” of funding at all—it is instead a process for *reviewing and approving* payment requests, which is the very opposite of a categorical halt on disbursement. Second, the manual review process is implemented pursuant to FEMA’s independent authorities, which are not circumscribed by the Court’s injunction. Thus, Plaintiffs have failed to demonstrate any violation of the Court’s injunction.

A. The Manual Review Process Is Not a “Freeze” on Funding

This Court’s injunction prohibits agencies from implementing “a categorical pause of freeze of funding,” ECF No. 161 at 44, but that is not what FEMA’s manual review process does. Instead, it is a process for reviewing and approving payment requests. As a matter of law, then, Plaintiffs cannot demonstrate a violation of the Court’s preliminary injunction.

In relevant part, this Court’s injunction provides:

The Agency Defendants are enjoined from pausing, freezing, blocking, canceling, suspending, terminating, or otherwise impeding the disbursement of appropriated federal funds to the States under awarded grants, executed contracts, or other executed financial obligations based on the OMB Directive, including funding freezes dictated, described, or implied by Executive Orders issued by the President before rescission of the OMB Directive or any other materially similar order, memorandum, directive, policy, or practice under which the federal government imposes or applies a categorical pause or freeze of funding appropriated by Congress. This includes, but is by no means not limited to, Section 7(a) of Executive Order 14154, Unleashing American Energy.

ECF No. 161 at 44, ¶ 2; *see* Pls.’ Mot. at 7 (quoting this paragraph in arguing that “FEMA appears to be violating the preliminary injunction”).

Plaintiffs never specifically identify the language in the injunction that they contend FEMA is violating. Plaintiffs do not argue, for example, that FEMA has improperly frozen funds to the Plaintiff states “based on the OMB Directive.” ECF No. 161 at 44, ¶ 2. Nor do they contend that FEMA has implemented a “funding freeze[] dictated, described, or implied by [an] Executive Order[] issued by the President before rescission of the OMB Directive[.]” *Id.* That leaves only the question whether FEMA is implementing a “materially similar order, memorandum, directive, policy, or practice under which the federal government imposes or applies a

categorical pause or freeze of funding appropriated by Congress.” *Id.* Plaintiffs’ motion does not even attempt to connect their assertions of noncompliance with the actual text of the Court’s injunction, *see* Pls.’ Mot. at 7-9, which is reason enough to deny them relief.

In any event, as discussed previously, FEMA’s “manual review process is not a pause or withholding of grant funds . . . nor does it mean that the grant is being frozen, held, or not being distributed.” 2d Hamilton Decl. (ECF No. 166-1) ¶ 9. “Instead, it is simply an internal control where FEMA staff manually review all grant payment requests before disbursing payments to recipients.” *Id.* Plaintiffs do not explain how a review process, specifically for the purpose of approving payments, equates to a “categorical pause or freeze of funding” for the grant itself. *See* 3d Hamilton Decl. ¶ 8 (“confirm[ing] that FEMA has already made payments since instituting the manual review process”).

Instead, Plaintiffs seize on isolated words in various documents to portray Defendants as having acknowledged that a “hold” or “pause” is in effect. *See* Pls.’ Mot. at 7. Plaintiffs continue to focus on a February 10 e-mail, but Mr. Hamilton has already explained that, despite some imprecise language in the e-mail, the e-mail’s directive was not “inten[ded] to freeze grant payments,” 2d Hamilton Decl. ¶ 6, and FEMA officials promptly clarified the matter within days, *id.* ¶¶ 6-8.¹

¹ Plaintiffs also contend that FEMA has, in fact, “paused funding to entire programs.” Pls.’ Mot. at 7. But those pauses have nothing to do with the manual review process that is the subject of their enforcement motion. Defendants have already explained that those three specific programs were paused in a permissible

Plaintiffs also assert that the manual review process “is essentially the same funding pause pending purported review of grant programs that OMB directed each agency to carry out, and which this court enjoined.” Pls.’ Mot. at 8. But that argument mischaracterizes the two fundamentally different “reviews.” The review contemplated by OMB Memo M-25-13 was for agencies to “review agency programs and determine the best uses of the funding for those programs consistent with the law and the President’s priorities.” OMB Memo M-25-13, at 2. The manual review process, in contrast, is “intended to ensure reimbursement payment requests are allowable, allocable, and reasonable per each award’s terms and conditions . . . and are free from fraud, waste, or abuse.” 2d Hamilton Decl. ¶ 9. The latter cannot possibly be equated to the “review” contemplated by OMB Memo M-25-13, and in any event the Court’s injunction does not prohibit agencies from engaging in “reviews”—only freezes on payments, which the manual review process is not.

In an attempt to further support their assertion that the “manual review process” is just a freeze by another name, yesterday Plaintiffs filed a supplemental declaration attaching an e-mail from a FEMA employee who stated that “[c]urrently, all grants are still pending review for compliance with Executive Orders.” ECF

exercise of agency discretion, based on concerns about funding illegal activities. See 2d Hamilton Decl. (ECF No. 166-1) ¶ 3; 1st Hamilton Decl. (ECF No. 102-1) ¶¶ 4-6; DHS Memorandum, *Direction on Grants to Non-governmental Organizations* (Jan. 28, 2025) (ECF No. 102-2). Indeed, one of those paused grant programs—the Shelter and Services Program—was the subject of Defendants’ earlier pre-clearance motion, see ECF No. 102, which Plaintiffs did not oppose, see ECF No. 104, and which this Court denied as moot, see ECF No. 107. That particular pause, therefore, cannot possibly form the basis for Plaintiffs’ allegations of noncompliance.

No. 169-1, Ex. C. As the attached declaration confirms, however, that individual employee is mistaken, FEMA has taken steps to correct that employee's understanding, and that employee's statement does not accurately reflect the current status of that particular payment request. *See* 3d Hamilton Decl. ¶ 27. A single employee's mistaken understanding is not a valid basis for concluding that the agency as a whole is violating the Court's injunction, particularly in the face of the attached declaration (and prior ones) from the current head of FEMA.

At bottom, FEMA's manual review process cannot be described as a "pause" or "freeze" of funding that would be subject to the Court's injunction. And to the extent there were any doubt, the First Circuit's decision yesterday on Defendants' stay motion confirms that this Court's injunction is limited to funding freezes, not ancillary practices like agency review and processing of payment requests:

[W]e understand the scope of the District Court's preliminary injunction to operate on freezes that were implemented: (1) pursuant to the Unleashing EO and Guidance, the OMB Directive itself, or the other EOs referenced in the OMB Directive; and (2) regardless of whether the freezes began before the OMB Directive's issuance on January 27, 2025.

New York v. Trump, No. 25-1236 (1st Cir. Mar. 26, 2025), slip op. at 30; *see also id.* at 45 ("The order granting the preliminary injunction plainly enjoins the Agency Defendants from maintaining categorical 'funding freezes' based on the identified Executive Orders. And, as we have explained, 'funding freezes' are 'categorical' freezes on obligated funds."). Plaintiffs' enforcement motion—essentially arguing that FEMA's process for reviewing payment requests is too slow—has nothing to do with a categorical freeze on funding, let alone one undertaken pursuant to OMB Memo M-25-13 or any of the Executive Orders. Plaintiffs may think that FEMA's

review process is unlawful or inappropriate, but that is a dispute for a separate case—not a matter of compliance with this Court’s injunction.

B. The Manual Review Process Is Also Justified by FEMA’s Independent Authorities

Even if this Court concluded that FEMA’s manual review process operated as a categorical freeze on funding, that still would not establish a violation of the injunction. The Court’s order also allows agencies to implement freezes as long as they do so on the basis of the agency’s own authorities. *See* ECF No. 161 at 42-43 (“The Court’s order does not prevent the Defendants from making funding decisions in situations under the Executive’s actual authority in the applicable statutory, regulatory, or grant terms; rather it enjoins agency action that violates statutory appropriations and obligations.” (citation omitted)); *New York v. Trump*, No. 25-1236 (1st Cir. Mar. 26, 2025), slip op. at 40 n.16 (explaining that the court’s preliminary injunction “could not apply to a pause or freeze based on an individualized determination under an agency’s actual authority to pause such funds.”); *see also id.* at 43 (“The District Court’s order granting the preliminary injunction does not bar all freezes in funding, however. It instead enjoins the discrete final agency actions to adopt the broad, categorical freezes challenged here.”).

As relevant here, FEMA plainly has authority to review payment requests “to ensure reimbursement payment requests are allowable, allocable, and reasonable per each award’s terms and conditions . . . and are free from fraud, waste, or abuse.” 2d Hamilton Decl. ¶ 9. Under the applicable grant regulations, in order for costs to be allowable under an award, those costs must (among other things) “[b]e necessary and

reasonable for the performance of the Federal award and be allocable thereto,” and “[b]e adequately documented.” 2 C.F.R. § 200.403(a), (g); *see also id.* §§ 200.404-405. And FEMA has an obligation to “manage and administer [each] Federal award in a manner so as to ensure that Federal funding is expended and associated programs are implemented in full accordance with the U.S. Constitution, applicable Federal statutes and regulations . . . and the requirements of this part.” *Id.* § 200.300(a); *see also* 2 C.F.R. § 3002.10 (DHS regulation adopting the general OMB regulations in 2 C.F.R. part 200). Thus, FEMA has independent regulatory authority to review payment requests to ensure they are appropriate and lawful before approving funds for disbursement.

Contrary to Plaintiffs’ assertions, *see* Pls.’ Mot. at 9, FEMA’s manual review process implements and is justified by these regulatory authorities. *See* 2d Hamilton Decl. ¶¶ 5, 9-10. Plaintiffs cannot seriously dispute that agencies are entitled to ensure that payment requests are proper; indeed, Plaintiffs previously conceded that point in connection with one of Defendants’ prior preclearance motions. *See* ECF No. 103 (Defendants seeking permission to continue implementing an agency process for ensuring that payments are lawful and appropriate); ECF No. 104 at 2 (Plaintiffs’ non-opposition asserting that Defendants’ motion was “unnecessary”); ECF No. 107 (Order denying Defendants’ motion as moot). And as discussed previously, FEMA’s manual review process is likewise longstanding in nature, as “[s]ix FEMA programs have historically been subject to a manual review process.” 2d Hamilton Decl. ¶ 10. FEMA’s decision to extend the manual review process to additional grant programs

is a lawful exercise of FEMA’s own discretion and authorities under the regulations, which forecloses any assertion of injunction noncompliance.

Finally, Plaintiffs assert that FEMA’s review process runs afoul of the regulations governing timing of payments, including the 30-day payment window set forth in 2 C.F.R. § 200.305(b)(3). *See* Pls.’ Mot. at 8-9. As Plaintiffs note, however, that 30-day window does not apply to payments to States, *id.* at 8, and the regulation applicable to payments to States does not require payment on any specific timeline, only that “[t]he timing and amount of funds transfers must be as close as is administratively feasible to a State’s actual cash outlay[.]” 31 C.F.R. § 205.33(a). Regardless, that timing regulation does not supersede FEMA’s antecedent obligation to ensure that all payment requests are lawful and appropriate, and here FEMA has determined to use a manual review process in connection with such payment requests. Nothing in the regulations prohibits or limits FEMA’s discretion to structure its review process in such a manner.

Again, Plaintiffs may disagree with FEMA’s manual review process, and perhaps believe it is unlawful. But because FEMA has implemented that manual review process on the basis of its own authorities—not any of the enjoined authorities such as OMB Memo M-25-13 or any of the Executive Orders listed in that OMB Memo—FEMA has not violated the Court’s preliminary injunction.

III. The Attached Declaration Explains FEMA’s Ongoing Manual Review, Highlighting that No Relief is Necessary

The above discussion demonstrates that, as a matter of law, FEMA’s manual review process does not violate the Court’s preliminary injunction. The Court should

thus deny Plaintiffs' motion without any further consideration of the facts. To the extent the Court believes further factual information regarding FEMA's manual review process is necessary, however, Defendants submit the attached declaration apprising the Court of the current status of FEMA's manual review process, which further highlights that injunctive relief invalidating FEMA's ongoing review processes would be inappropriate. *See* 3d Hamilton Decl. (attached hereto).

In particular, FEMA acknowledges that its manual review process may result in grantees waiting a longer time to receive payments on their grants compared to the prior system, but FEMA believes that the manual review is warranted to ensure all payments are lawful and appropriate, and FEMA is continuing to work to improve and expedite its manual review process. *See* 3d Hamilton Decl. ¶¶ 6-10. Given the many different grant programs and systems that FEMA administers, "the development and implementation of the manual review process has taken time" but "[t]he process continues to be refined and improved every day." *Id.* ¶ 9. FEMA currently expects that "it will be able to fully clear the backlog of grant payment requests within 90 days of the writing of this Declaration." *Id.* ¶ 10.

As to the specific payment requests identified in Plaintiffs' motion and accompanying declarations, FEMA is continuing to process and review them. *See id.* ¶¶ 22-26. For Hawai'i in particular, review is ongoing based in part on the concerns expressed in the Secretary's January 28, 2025 memorandum regarding funds provided to non-governmental organizations being used to promote illegal activities. *See id.* ¶ 22; ECF No. 102-2. Given the seriousness of those concerns and extent of

review required, FEMA cannot commit to a particular timeframe for acting on the pending payment requests from Hawai'i. *See id.* ¶ 22.

As for the other States that have submitted declarations, Colorado does not indicate that it has attempted to submit any payment requests since March 19, 2025, which is when FEMA distributed instructions to grantees about how to submit payment requests through the ND Grants system in light of the recently discovered issue with PARS that FEMA was working to correct. *See* 3d Hamilton Decl. ¶ 11 (discussing the new instructions distributed to grantees); 2d Hamilton Decl. ¶ 27 (discussing this previously unknown issue); *see also* Colorado Decl. (ECF No. 168-3) ¶¶ 7-20 (discussing various payment requests, or attempts to submit payment requests, none of which appears to be after March 17, 2025). As for Oregon's declaration, it is similarly not specific as to when the State attempted to submit payment requests, and at least some of their issues may likewise have been attributable to the now-corrected PARS issue. *See* Oregon Decl. (ECF No. 168-2) ¶ 18 ("Many of OEM's FEMA grants are hosted on the PARS platform."). In any event, FEMA's declaration confirms that FEMA is working to process the payment requests it has received from those States. *See* 3d Hamilton Decl. ¶¶ 22-26.

In sum, the attached declaration confirms that FEMA is working to process the Plaintiff States' payment requests, while also seeking to implement its manual review process across the wide number of grants and systems that FEMA administers. That implementation process has taken some time, but FEMA continues to work to improve the process, which underscores that injunctive relief

from this Court—invalidating or otherwise overseeing FEMA’s ongoing efforts to improve grant processing—would be inappropriate.

IV. Any Relief Should Be Limited

For the foregoing reasons, the proper course is to deny Plaintiffs’ motion. Out of an abundance of caution, however, Defendants also emphasize that the relief requested by Plaintiffs is both vague and intrusive. *See* Pls.’ Mot. at 10 (requesting that the Court “order FEMA to immediately halt the challenged practice,” without ever defining what Plaintiffs understand the challenged practice to encompass). Accordingly, any relief that the Court orders should be substantially more limited.

Specifically, to the extent the Court does enter relief, such relief should—at most—direct FEMA to act on the Plaintiff States’ payment requests within seven days of any such request. That would approximately accord with Plaintiffs’ own asserted timeframe for prior receipt of funds from FEMA. *See* ECF No. 168-1 ¶ 13 (“In the past, it typically took approximately 1 week for the state to receive federal funds from a PMS drawdown request.”). Such an order, although intrusive and unwarranted, would fully resolve Plaintiffs’ concerns about delays in the processing of their payment requests. For that reason, there is certainly no need or basis for the Court to issue a broader order, such as invalidating FEMA’s manual review process as a whole—a process which FEMA currently applies (and has historically applied) to numerous grant programs and entities not at issue in this case.

Additionally, to the extent the Court deems it necessary to order dissemination of its prior or subsequent orders to employees within FEMA, the Court should not require Defendants to provide “the names of recipients of the notice.” Pls.’ Mot. at 10.

That would be highly burdensome to compile, especially on Plaintiffs' requested 48-hour timeline (which is itself arbitrary and unnecessary). Moreover, Plaintiffs have not demonstrated any plausible need for knowing the names of all FEMA employees who are considered "leadership" or "who administer . . . grants and other federal financial assistance." Pls.' Mot. at 10. Creating (let alone filing) such a list would threaten the personal privacy interests of numerous individuals not directly involved in this lawsuit. There is plainly no basis for such a list of names, and this Court should not order Defendants to prepare or submit such a list, even if it otherwise grants Plaintiffs' motion.

Conclusion

Plaintiffs' renewed second motion to enforce the preliminary injunction with respect to FEMA funding, ECF No. 168, should be denied.

Dated: March 27, 2025

Respectfully submitted,

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CERTIFICATION OF SERVICE

I hereby certify that on March 27, 2025, I electronically filed the within Certification with the Clerk of the United States District Court for the District of Rhode Island using the CM/ECF System, thereby serving it on all registered users in accordance with Federal Rule of Civil Procedure 5(b)(2)(E) and Local Rule Gen 305.

/s/ Andrew F. Freidah
Andrew F. Freidah

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLANDSTATE OF NEW YORK, *et al.*,

Plaintiffs,

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Civil Action No. 1:25-cv-39 (JJM)

DONALD TRUMP, IN HIS OFFICIAL CAPACITY AS
PRESIDENT OF THE UNITED STATES, *et al.*,

Defendants.

THIRD HAMILTON DECLARATION

I, Cameron Hamilton, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am the Senior Official Performing the Duties of the Administrator, Department of Homeland Security (DHS or Department), Federal Emergency Management Agency (FEMA).
The Senior Official Performing the Duties of the FEMA Administrator is the DHS official responsible for being the principal advisor to the President and Secretary of Homeland Security (Secretary) for all matters related to emergency management in the United States.
2. The statements made in this Declaration are based on my personal knowledge, on information provided to me in my official capacity, reasonable inquiry, and information obtained from various records, systems, databases, Department of Homeland Security employees, and information portals maintained and relied upon by the Department of Homeland Security in the regular course of business, and on my evaluation of that information.

3. In this Declaration, I incorporate by reference all the information in my earlier declaration filed with the Court on March 14, 2025. (March 14 Declaration) ECF No. 166-1. I also previously submitted a declaration dated February 11, 2025. ECF No. 102-1.
4. It is my understanding that on March 24, 2025, Plaintiffs filed a motion seeking to enforce the Court's Preliminary Injunction, claiming that FEMA is not in compliance with the Court's previously issued Preliminary Injunction. To the best of my knowledge FEMA continues to comply with the Preliminary Injunction.
5. This Declaration provides an update of the status of FEMA's implementation of the manual review process as described in my March 14 Declaration.
6. As stated in the March 14 Declaration, all requests for reimbursement related to FEMA grants are currently required to go through a manual review process prior to funds being disbursed. This process was started in response to the Secretary's January 28, 2025, memorandum and was formalized by me through the issuance of Grant Processing Guidance on February 14, 2025 (ECF No. 166-7). For the reasons stated in the March 14 Declaration, the manual review process is justified by and permissible under FEMA's independent regulatory authorities, including because it complies with the payment regulations governing Federal grant awards at 2 C.F.R. § 200.305 as well as Treasury-State Cash Management Improvement Act (CMIA) agreements.
7. The Department and FEMA believes that there are good reasons for instituting the manual review process for all grant reimbursement requests, the most important of which is to ensure consistency with the law and prevent fraud, waste, and abuse. The increased manual review process provides FEMA with increased internal controls which allows FEMA to confirm that each payment disbursed under a grant is supported by proper programmatic

and financial documentation, the conditions for the award are met, that high-risk transactions are flagged for further review, that the request is eligible under program regulations and/or guidance, that the request aligns with the program's Notice of Funding Opportunity (NOFO), and complies with federal financial regulations, including 2 C.F.R. Part 200. Further, the manual review process gives FEMA the ability to verify that each individual cost is eligible, allowable, allocable, reasonable, necessary, and aligns with the program award's terms and conditions. The manual review process is not intended to stymie preparedness, mitigation, and disaster recovery activities carried out by the States with FEMA grant funding. It simply gives FEMA a greater ability to monitor grant payments for compliance with all legal, financial, and programmatic requirements, including the grant's NOFO and grant conditions.

8. For most FEMA grants, the manual review process constituted a significant change in the way payments for grants were issued. Under the previous process, grant recipients were able to drawdown grant money without FEMA approving the individual payment. FEMA did not directly review documentation on the reason for the drawdown or the costs associated with it after the money was already withdrawn. FEMA's manual review process will likely result in some grant payments taking longer to process and approve, particularly as FEMA works to develop and implement its review process across multiple different grant programs, especially compared to timeframes under the prior system. But FEMA's manual review process is not a pause, freeze, or withholding of grant funds, as discussed in my March 14 Declaration. FEMA continues to work to improve and expedite its manual review process going forward. In fact, I can confirm that FEMA has already made payments since instituting the manual review process. On March 19, 2025, FEMA released funds to the State of Missouri for the Emergency Management Performance Grant Program (EMPG) and

Cooperative Technical Partners (CTP) program. On the same day, payments were issued under the Urban Search & Rescue (US&R) program for local Task Forces located in the following states: Massachusetts, Missouri, Ohio, Maryland, Colorado, Utah, Nevada, Washington, California, Florida, New Jersey, Pennsylvania, Nebraska, Indiana, and Texas.

9. Given that FEMA's grant awards have different terms and conditions, statutory, and regulatory requirements, as well as different payment systems, there is no "one size fits all" process by which FEMA can effectively review grant payments. It has taken time for FEMA to develop the manual review process. In part because doing so has involved engagement with multiple FEMA program, financial, and regional offices. Different processes had to be developed for FEMA's disaster, non-disaster, and mitigation grants. For that reason, the development and implementation of the manual review process has taken time. The process continues to be refined and improved every day.
10. I can confirm that FEMA has begun applying the manual review process to process grant payments and will continue to do so as quickly as permissible. FEMA staff have already begun to extract drawdown amendment requests from ND Grants and FEMA GO and begun a programmatic and financial review of the requests. FEMA believes it will be able to fully clear the backlog of grant payment requests within 90 days of the writing of this Declaration.
11. On March 19, 2025, FEMA distributed information and detailed instructions to all its grant recipients regarding the manual review process for non-disaster grants. Exhibit 1. These are the instructions that I discussed in paragraph 27 of my March 14 Declaration. At the time I expected the new process for submitting payment requests through ND Grants to be functional on or around March 14, 2025 with instructions to be distributed to grant recipients shortly thereafter. However, further coordination resulted in the new process

becoming functional and instructions being distributed on March 19, 2025. Since being provided these instructions, FEMA grant recipients have submitted 271 requests for payment or amended their earlier payment requests for 27 of the GPD grant programs. FEMA continues to work closely with our grant recipients to assist them with the manual review process. If additional information is needed from the grant recipient, a request for information will be submitted and recipients are strongly encouraged to respond within three business days.

12. On March 25, 2025, FEMA began training hundreds of employees daily on the manual review process. The training focuses on reviewing grant payment requests for completeness, accuracy, and compliance with all applicable laws, regulations, and grant terms and conditions. Once payment requests are received by FEMA, employees are being trained to immediately begin the manual review process to ensure that payments, once approved, are quickly distributed to our grant recipients. We are moving as fast as we can so that approved payments can begin as soon as feasible.
13. The manual review process involves several steps, each designed to ensure that payments made to grant recipients are consistent with the terms and conditions of the grant, all applicable laws and regulations, as well as FEMA and the Department's priorities. These steps are necessary to ensure that the funds are used for the statutory purpose of the grant and to safeguard taxpayer funds. The process is complicated by the fact that FEMA uses multiple grant and payment systems for the programs it administers.
14. Individual Assistance (IA) is conducting a manual review of payments on its community services grants: Disaster Case Management (DCM), Crisis Counseling Program (CCP), and Disaster Legal Services (DLS). As part of this review, FEMA staff will compile details on the

recipients to seek clearance to release payments, while also pursuing adjustments that will further reduce risk on these programs so FEMA can return to a more routine grant review and approval process. For some programs such as Disaster Unemployment Assistance (DUA), FEMA has successfully moved through a review process and are able to resume approvals and movement of those programs. For some programs, the manual review may also require Department approval for payments, based on the Secretary's January 28, 2025, Memorandum.

15. FEMA's manual review process for the Public Assistance (PA) grant payment requests is designed to ensure that federal disaster funds are appropriately allocated and that projects comply with existing laws and policies. The process requires both a programmatic and financial review of reimbursement requests and ensures that all payments expenses are reasonable, necessary, and allowable under the terms and conditions of the PA program, including compliance with existing laws and policies. Once reimbursement requests are approved, they are routed to FEMA and Department leadership for final approval before being released to PA recipients.

16. FEMA's manual review of non-disaster grant payment requests is a three-step process.

Once a payment request has been received, the first step of the process is a programmatic review of the reimbursement request and supporting documentation by the FEMA program officers. If additional program information needs to be submitted by the recipient, a request for information will be submitted with a requested response within 3 business days. As part of this review and verification, grant program offices will confirm that all the conditions for the award are met, that high-risk transactions are flagged for further review, that the request is eligible under program regulations and/or guidance, and that the request aligns with the program's NOFO. This includes verifying that the individual requests are eligible, allowable,

allocable, reasonable, necessary, and align with the program's terms and conditions. FEMA grant program staff will then recommend approval or disapproval of the grantee's reimbursement request to FEMA leadership, the Department, and/or the Secretary, depending on the grant program, for final approval.

17. The second step of the non-disaster grant manual review process described above is a review by FEMA financial grant management specialists (GMS). GMS will ensure that all the financial documentation supporting the drawdown of grant funds is submitted into the system. The type of supporting documentation needed is dependent on the grant program and could include budget tracking documents showing the approved budget and actual expenditures of the grant project, cost summary sheets detailing the costs covered by the drawdown request, and other documentation supporting the costs claimed (e.g., invoices, cost breakdowns, and cost justifications). If additional financial information needs to be submitted by the recipient, a request for information will be submitted with a requested response within 3 business days. This financial review will verify that the reimbursement requests comply with federal financial regulations, including 2 C.F.R. Part 200. In addition, FEMA GMS will confirm that the relevant expenses are reasonable, necessary, and allowable per the grant's NOFO and award conditions. This will include verifying that the costs were incurred within the grant's period of performance and that the expenditures align with the project's budgeted costs. FEMA GMS will then recommend approval or disapproval of the grantee's reimbursement request to FEMA leadership, the Department, and/or the Secretary, depending on the grant program, for their final approval.
18. The third and final step of the manual review process, following final approval by FEMA leadership, the Department, and/or the Secretary, program, financial, and regional offices, is that FEMA will process the payment request through the relevant grant system. This

requires FEMA staff to upload the final determination into the grant file. As stated above, because FEMA grant payments are administered through several different systems, the technical process for final release of the funds will vary depending on the grant program. However, once the final determination has been made and uploaded into the respective system, the approved funds will be made available to the grantee.

19. If a reimbursement request is denied, grant recipients will be notified and may be able to submit a new reimbursement request.
20. FEMA's manual review process for mitigation grants (e.g. HMGP, BRIC, PDM, FMA, STRLF, NDSP, HHPD, CAP-SSSE) is designed to ensure that federal mitigation funds are appropriately allocated and that projects comply with existing laws and policies. The process requires both a programmatic and financial review of reimbursement requests and ensures that all payments expenses are reasonable, necessary, and allowable under the terms and conditions of the mitigation program, including compliance with existing laws and policies.
21. As to the specific payment requests addressed in Plaintiffs' motion:
22. Hawaii: The Disaster Case Management Program (DCMP) is part of the Individual Assistance manual review. Individual Assistance is conducting a manual review of these grants and is collecting information regarding the request for payment referenced in the motion regarding more specifics as to the identity of the providers of the services, and the nature of the services provided. Once this information is collected, it will be provided to the Department for review and approval. This is consistent with the Secretary's January 28, 2025 memorandum and the concerns expressed in that memorandum. I understand that Hawaii has expressed concerns about the timing of its payments; FEMA is actively reviewing

Hawaii's payment requests but cannot commit to a particular timeframe for doing so given the Department's concerns about ensuring that federal funds provided to nongovernmental organizations do not promote illegal activities, as expressed in the Secretary's January 28, 2025 memorandum.

FEMA is currently reviewing payment requests from Hawaii under the following grant programs under the manual review process described above in paragraphs 16 to 18.

- FY 2023 Assistance to Firefighters Grants (AFG)
- FY 2023 Cooperating Technical Partners (CTP)
- FY 2023 Homeland Security National Training Program- National Domestic Preparedness Consortium (HSNTP-NDPC)
- As of the filing of this Declaration, payments are set to be made for Hawaii's FY 2022, FY 2023, and FY 2024 Emergency Management Performance Grants (EMPG) pending final approval. FEMA is working as quickly as possible on the final approval process.

23. Oregon: FEMA is currently reviewing payment requests from Oregon under the following grant programs under the manual review process described above in paragraphs 16 to 18.

- FY 2023 Cooperating Technical Partners (CTP)
- FY 2024 Cooperating Technical Partners (CTP)
- FY 2019 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2020 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2021 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2022 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2023 Assistance to Firefighters Grants (AFG)

The Individual State Earthquake Assistance (ISEA) grant program is still under review by FEMA and DHS for further direction on the best process for conducting a manual review. FEMA is working as quickly as possible to implement the manual review for such programs.

As of the filing of this Declaration, payments are set to be made for Oregon's FY 2023 and FY 2024 EMPG, its FY 2022 State Homeland Security Grant Program (SHSGP), and a Staffing for Adequate Fire and Emergency Response (SAFER) award for Marion County Fire District No. 1 pending final approval. FEMA is working as quickly as possible on the final approval process.

24. Colorado: FEMA is currently reviewing payment requests from Colorado under the following grant programs under the manual review process described above in paragraphs 16 to 18.

- FY 2020 Assistance to Firefighters Grants (AFG)
- FY 2021 Assistance to Firefighters Grants (AFG)
- FY 2021 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2022 Assistance to Firefighters Grants (AFG)
- FY 2022 Fire Prevention and Safety (FP&S)
- FY 2023 Cooperating Technical Partners (CTP)
- FY 2023 Homeland Security National Training Program- National Domestic Preparedness Consortium (HSNTP-NDPC)
- FY 2023 Staffing for Adequate Fire and Emergency Response (SAFER)

The Hazardous Materials Emergency Preparedness, grant program is still under review by FEMA and DHS for further direction on the best process for conducting a manual review. As noted above, FEMA is working as quickly as possible to implement the manual review for such programs.

25. Arizona: FEMA is currently reviewing payment requests from Arizona under the following grant programs under the manual review process described above in paragraphs 16 to 18.

- FY 2020 Fire Prevention and Safety (FP&S)
- FY 2020 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2021 Assistance to Firefighters Grants (AFG)
- FY 2021 Fire Prevention and Safety (FP&S)
- FY 2022 Assistance to Firefighters Grants (AFG)
- FY 2022 Fire Prevention and Safety (FP&S)
- FY 2022 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2023 Assistance to Firefighters Grants (AFG)
- FY 2023 Fire Prevention and Safety (FP&S)
- FY 2023 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2023 Urban Search and Rescue (US&R)
- FY 2024 Urban Search and Rescue (US&R)

As of the filing of this Declaration, payments are set to be made for Arizona's FY 2022 State and Local Cybersecurity (SLCGP) and FY 2022 Urban Area Security Initiative (UASI) grant program pending final approval. FEMA is working as quickly as possible on the final approval process.

26. Illinois: FEMA is currently reviewing payment requests from Illinois under the following grant programs under the manual review process described above in paragraphs 16 to 18.

- FY 2020 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2021 Assistance to Firefighters Grants (AFG)
- FY 2021 Staffing for Adequate Fire and Emergency Response (SAFER)

- FY 2022 Assistance to Firefighters Grants (AFG)
- FY 2022 Staffing for Adequate Fire and Emergency Response (SAFER)
- FY 2023 Assistance to Firefighters Grants (AFG)
- FY 2023 Fire Prevention and Safety (FP&S)
- FY 2023 Staffing for Adequate Fire and Emergency Response (SAFER)

As of the filing of this Declaration, payments are set to be made for Illinois's FY 2022 and FY 2023 State Homeland Security Grant Program (SHSGP) and its FY 2021 Urban Area Security Initiative (UASI) grant program pending final approval. FEMA is working as quickly as possible on the final approval process.

27. In addition, it is my understanding that after business hours on March 26, 2025, Plaintiffs filed a Notice of Supplemental Filing attaching an Affidavit of R. Henry Weaver regarding Illinois grants. In the Affidavit, Mr. Weaver states that on March 25, 2025, a FEMA employee responded to Mr. Weaver's notice that he had submitted a grant payment request under the manual review process and stated: "Currently, all grants are still pending review for compliance with Executive Orders. We are waiting for further guidance for when we can approve payment requests. I'll provide an update as soon as possible." This email is not accurate. FEMA is not holding grant payments "pending review for compliance with Executive Orders." FEMA has identified this employee and has corrected this employee's misunderstanding. This employee has also been instructed to immediately attend the manual review training on March 27, 2025. Moreover, FEMA has informed the employee that if the employee sent the same or a similar message to any other grant recipients to immediately notify these recipients that FEMA is not withholding grant payments pending review for compliance with Executive Orders. As to the grant identified in Mr. Weaver's Affidavit, the Individual State Earthquake Assistance (ISEA) grant program is still

under review by FEMA and DHS for further direction on the best process for conducting a manual review. FEMA is working as quickly as possible to implement the manual review for such programs.

Executed this 27th day of March 2025

A handwritten signature in black ink, appearing to read "C. Hamilton", is written over a horizontal line.

Cameron Hamilton
Senior Official Performing the Duties of Administrator



From: FEMA (Federal Emergency Management Agency) <fema@service.govdelivery.com>

Sent: Wednesday, March 19, 2025 6:44 PM

To: [REDACTED]

Subject: Instructions to Grant Recipients Pursuing Payments in FEMA GO and ND Grants/PARS

FEMA Grants News Banner



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Instructions to Grant Recipients Pursuing Payments in FEMA GO and ND Grants/PARS

FEMA and the Department of Homeland Security (DHS) are instituting additional reviews on all grant payments and obligations to ensure allowability in accordance with 2 C.F.R. § 200.305. As noted in the February 28, 2025, *Message to Grant Recipients on Manual Review Process*, the Federal Emergency Management Agency (FEMA) is taking swift action to ensure the alignment of its grant programs with Secretary of Homeland Security Kristie Noem's direction.

These measures will ensure funds are disbursed appropriately while continuing to support and prioritize communities and disaster survivors who rely on FEMA for assistance. Once a recipient submits a payment request, FEMA will review the request. If FEMA approves a payment, it will process the payment through the respective non-disaster grant systems and inform recipients accordingly for drawdown purposes. If FEMA disapproves a payment, FEMA will inform the recipient.

Processing and Payment Timeline:

FEMA must comply with regulations governing payments to grant recipients. See 2 C.F.R. § 200.305. For grant recipients other than States, 2 C.F.R. § 200.305(b)(3) stipulates that FEMA is to make payments on a reimbursement basis within 30 days after receipt of the payment request, unless FEMA reasonably believes the request to be improper. For state recipients, 2 C.F.R. § 200.305(a) instructs that federal grant payments are governed by Treasury-State Cash Management Improvement Act (CMIA) agreements ("Treasury-State agreement") and default procedures codified at 31 C.F.R. part 205 and Treasury Financial Manual (TFM) 4A-2000, "Overall Disbursing Rules for All Federal Agencies." See 2 C.F.R. § 200.305(a).

Treasury-State agreements generally apply to "major federal assistance programs" that are governed by 31 C.F.R. part 205, subpart A and are identified in the Treasury-State agreement. 31 C.F.R. §§ 205.2, 205.6. Where a federal assistance (grant) program is not governed by subpart A, payment and funds transfers from FEMA to the state are subject to 31 C.F.R. part 205, subpart B. Subpart B requires FEMA to "limit a funds transfer to a state to the minimum amounts needed by the state and must time the disbursement to be in accord with the actual, immediate cash requirements of the state in carrying out a federal assistance program or project. The timing and amount of funds transfers must be as close as is administratively feasible to a state's actual cash outlay for direct program costs and the proportionate share of any allowable indirect costs." 31 C.F.R. § 205.33(a). Nothing in 31 C.F.R. part 205, subpart B or the Treasury Financial Manual (TFM) 4A-2000 prohibits FEMA's manual review process. Nearly all FEMA grants are not "major federal assistance programs." As a result, payments to states for those grants are subject to the "default" rules of 31 C.F.R. part 205, subpart B.

If additional information is needed, a request for information will be issued by FEMA to the recipient; recipients are strongly encouraged to respond to any additional FEMA request for information inquiries within three business days. If an adequate response is not received, the request may be denied, and the entity may need to submit a new reimbursement request; this will re-start the 30-day timeline.

Submission Process

All non-disaster grant program reimbursement requests must be reviewed and approved by FEMA prior to drawdowns.

For all non-disaster reimbursement requests (regardless of system), please ensure submittal of the following information:

1. Grant ID / Award Number
 2. Total amount requested for drawdown
 3. Purpose of drawdown and timeframe covered (must be within the award performance period)
 4. Non-Governmental Organizations (NGOs) Funding Details (if applicable).
- Is funding provided directly or indirectly to an NGO?
 - If no, include statement "This grant funding is not being directed to NGOs."
 - If yes, provide the following details:
 1. The name, mission statement, and purpose of each NGO receiving funds, along with the amount allocated and the specific role or activity being reimbursed.
 2. Whether the NGO's work or mission involves supporting aliens, regardless of whether FEMA funds support such activities.
 3. Whether the payment request includes an activity involving support to aliens?

5. Supporting documentation to demonstrate that expenses are allowable, allocable, reasonable, and necessary under 2 CFR Part 200 and in compliance with the grant's Notice of Funding Opportunity (NOFO), award terms, and applicable federal regulations.

In some cases, additional supporting documentation may be required (if not already stipulated in the NOFO and/or award Terms and Conditions). Additional documentation could include:

- Invoices
- Purchase Orders – Supporting documentation for procured goods/services
- Evidence that the Indirect Cost Rate Agreement is current (if applicable)

If required, additional documentation would be submitted through the respective grants system (ND Grants or FEMA GO). Please coordinate with your FEMA program officer for more guidance.

For non-disaster grant programs, FEMA uses two different systems; each system requires different processes. More recent grant awards are managed (including payments) through the FEMA Grants Outcomes (FEMA GO) system. Older/legacy awards are managed in the Non-disaster Grants (ND Grants) System; ND Grants payments are facilitated through the separate Payment and Reporting System (PARS).

FEMA GO

FEMA GO Steps to Submit Payment Requests for active grant awards – Authorized Organizational Representative (AOR) User Role

The following guide provides instructions for FEMA GO external users to log-in, navigate the system, complete a request for payment, and view the request or FEMA decision. Once the grantee submits the payment request in FEMA GO it will contain the amount requested. The payment is then reviewed and approved/denied/returned by FEMA. If payment is approved, it is sent to the financial processing system to be processed by Treasury. Once processed, FEMA GO will notify the grantee of the final decision via email through the FEMA GO system and a copy of the email will be saved in the Grant File in the FEMA GO System. If FEMA disapproves a payment, FEMA will inform recipient. Please use the guide to submit the required information as noted under "Submission Process" above.

- [FEMA GO Request for Payment Guide](#)

For assistance, please contact the FEMA GO Help Desk, Monday-Friday | 9 a.m. – 6 p.m. E.T. | 1-877-585-3242 | FEMAGO@fema.dhs.gov

ND Grants/PARS

Steps to Submit Payment Requests

Historically, grant recipients whose awards were located in ND Grants visit PARS to draw down for reimbursement. Given the manual review process underway, **grant recipients must now submit a narrative amendment first in ND Grants**. FEMA will review the narrative amendment and communicate approval status back to the recipient. If approved, the recipient will be instructed to draw down their approved monetary amount from PARS. If FEMA disapproves a payment, FEMA will inform recipient.

The following guide – [ND Grants Creating Narrative Only Amendment](#) - provides instructions for grant recipients to submit payment requests via a narrative amendment approach in ND Grants.

For system assistance, please contact the ND Grants Service Desk. For programmatic or

grants management questions, please contact your Program Manager or Grants Specialist, Monday – Friday, 9 a.m. – 6 p.m. E.T. at 1-800-865-4076 or by email at NDGrants@fema.dhs.gov.

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