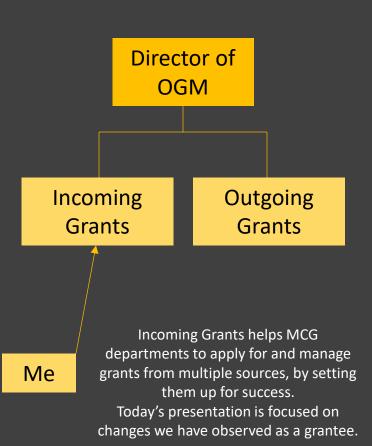


Current State of the Federal Funding Landscape Update for local nonprofits in Montgomery County

Office of Grants Management (OGM)
Incoming Grants
July 31, 2025

Federal "Grants" = A type of Federal Financial Assistance (FFA); including Discretionary Grants, Formula Funding, Cooperative Agreements, and Congressionally Directed Spending (CDS/Earmarks), including State pass-through grants

Office of Grants Management (OGM)



Agenda

- Introduction to Office of Grants Management (OGM),
 Montgomery County Government (MCG)
- What we are seeing
- Responding to change
- Best Practices and Lessons Learned

DISCLAIMER: This presentation is NOT legal advice. The advice and recommendations included here are for information purposes only and do not replace consulting an attorney.

Incoming Grants



While this presentation is focused on incoming grants, let's get this out of the way:

Federal Impact on MCG Outgoing Grants

• Close to **Zero**

Incoming Grants

- Almost ALL signed County Outgoing Grants are from non-federal sources
 - General Funds (County tax revenues)
 - Current Revenue (County tax revenue for Capital Improvement Program)
 - Enterprise Funds (Revenue from permits, fines, or other govt. fees)
 - State Settlement Funds (Transfers from the State for legal settlements)
- <u>ALL</u> currently open grant programs <u>AND ALL</u> grant programs <u>currently</u> on the Grant Program Forecast are from **non-federal sources**
- <u>Exception</u>: FY25 Low & Middle Income Electrification grant program (DEP) and the FY25 Edible Food Recovery Pilot (also DEP) are both federally funded <u>earmarks</u>. Both programs have been awarded and <u>Federal Grantors have given a green light for these programs to move forward.</u>







What we are seeing

Changes in the federal funding landscape

Additional resource: Federal Funding Landscape Timeline and Best Practices

The Trump Administration is working to cut Federal Financial Assistance (FFA), including grants

- 1. The Trump Administration is trying to cut government spending (in their non-priority areas) and bureaucracy by cutting FFA:
 - However, the process of cancellation is governed by law.
 - And keep in mind that grants are authorized by specific laws (passed by Congress), which must be followed.
 - And grant agreements are legal documents that must be followed.
- 2. Groups and individuals are filing suit in court to stop cuts.
- 3. The Courts are issuing orders to:
 - Let pauses or cuts proceed when they don't cause immediate harm or when courts find cuts align with laws.
 - Stop pauses or cuts when they may cause harm or when courts find they don't align with laws.
- 4. The Administration is testing the FULL extent and applicability of laws, regulations, and court orders, leading to uncertainty.
- 5. Uncertainty is everywhere except in one place: Expect reduced availability of federal funding, including grants.



Impacts throughout FFA cycle

Federal opportunities re-appeared, but with updated terms and conditions (immigration compliance, drug approaches, DEI certifications), very short turn-around times, or nuanced requirements at the time of application (mandated time for community review); Lots of unpredictability; Grants.gov back with HHS (w/post-DOGE backlog).

Negotiations on hold; new awards slowly being announced but many under review. Many awarded but unsigned/unobligated grants are being eliminated if Congress deobligates or rescinds funds.

Once an award is executed by both sides, it is obligated and legally binding.

Terminations, stop-work orders, certification requests, and expected amendments; limited and varied contact with Grants Officers makes compliance difficult; Reimbursements taking longer and require justification and multi-step processes. Some reductions in requirements (NEPA).











Categories of federal action



EXECUTIVE ORDERS (EOs) & DIRECTIVES:

These express how the President *would like* the federal government to operate.



FEDERAL AGENCY CHANGES:

Agencies interpret and implement the EOs. Could include updates to grant agreements and terms, or guidance for policies and NOFOs.



COURT ACTIONS:

States, universities, nonprofits, and others are party to suits filed against the administration, *challenging the legality* of the changes.



CONGRESSIONAL BUDGETING:

Congress is *agreeing with many cuts* to grant programs, including rescissions of existing funding and reduced future funding.

High level impacts

- Executive Orders have no immediate impact on grantees, but Agency actions do.
- There are significant differences in federal agency implementation of policies, but they are increasingly restrictive.
- Court Actions and federal agency interpretations often delay and modify the long-term effects of any federal actions, adding to uncertainty.
- The Administration is finding new ways to stop, pause, delay, restrict, or cut grants (existing and future) despite what the Courts or Congress says.
- <u>Decreased funding and increased risks are to be</u>
 <u>expected and will increase.</u> All should be prepared to respond and adapt.





White House sets policy on grants



Executive Orders

- Court cases have blocked direct implementation of most Executive Orders (EO)
- Continue to see new EOs and policies causing disruption and uncertainty over a growing list of topics

Regulations

- White House Office of Management and Budget (OMB) announced upcoming update to 2 CFR 200
- Executive actions to reduce regulatory burdens

Policy Directive Topics

- Diversity, Equity, Inclusion, and Accessibility (**DEIA**)
- Gender issues and identity
- Climate and energy, carbon and social accounting
- Immigrants and immigration enforcement,
 limiting benefits to qualified recipients
- Antisemitism and religion
- Criminality and enforcement (drugs, homelessness)
- Abortion and family planning
- Foreign involvement
- Nonprofits
- Jurisdiction (FEMA, vaccines, housing, homeless)





Agency actions are extensive and wide-reaching

Existing Grants

- Amendments and certification requirements (DEI, Immigrants, Immigration enforcement)
- Grant pauses, terminations, clawbacks, and program cancellations – especially for States and nonprofits; Many blocked by courts
- Still seeing pauses and new cuts (even for newly approved grants)
- Slow (if any) adherence to court orders to release funds (months not days, using the appeals process to advantage)
- Staffing cuts and difficulty communicating with Grant Officers

Compliance

- More tripwires to stay compliant (e.g. 30-day review; multi-step processes; no benefits for unqualified aliens)
- More attention to compliance (automated alerts)
- Communications gag orders make compliance difficult,
- Communications not standard among agencies
- Agency "orders" come in many forms to many locations (Memos, Stop-work orders to: Principal Investigators, eBiz contacts, sam.gov contacts)
- DOJ "Civil Rights Initiative" encourages use of False Claims Act (relevant to certifications)

Payments

- Payments cannot be paused, but HHS, DHS/FEMA, DOE, DOD, NIH, and EPA doing "manual reviews" or requiring "Secretarial Approval" and using other administrative means to delay spending
- "Defend the Spend" & ASAP justification delaying or stopping payments (months not days)

Opportunities and New Grants

- Incorporating EOs into priorities/ programs, NOFOs, grant agreements, terms & conditions; adding Effectuate Clause
- New grant opportunities tightly linked to authorizing law (e.g. nothing outside of law is allowed)
- Manipulation of NOFOs, more strings to get funding (certify immigration, certify 30-day community review or Leadership review)
- Changing eligibility and evaluation criteria (e.g. Opportunity Zones)
- Very short turn-around times (a "recission"?)
- Grants.gov back with HHS, not DOGE
- NIH limiting # of applications, Al

Data/Technical

- Data removals
- Data being put back in some cases (cases dropped)
- Reduced regulations (NEPA)
- e Coordinated actions by agencies on single days (e.g. removed DEI reporting requirements on same day)





Federal Agency actions vary

Federal agency	Program-wide Cancellations	Grant Terminations (Whole or Partial)	Payment Pauses	Clawbacks	Policy changes	New Terms & Conditions	Programming shifts
DHS (FEMA)	Many: FEMA, immigrant services, "Sanctuary Cities"	Many: Local gov internet, "Sanctuaries", nonprofits	FEMA pause (blocked by Court)	De-obligation efforts	Mandates Infrastructure Risk Register. FEMA being restructured.	No DEI, gender, non-citizens; Immigration cooperation	National security, Border
EPA	Many: Climate, wildlife, NEPA	Many: 4 public rounds for non- alignment	Many: IRA and IIJA, some still paused	Attempted (Citibank)	Reduced NEPA reporting; May eliminate Energy Star	No DEI, less on WBEs, MBEs, less recycling, less regulated	Cost-efficient clean water, energy, reduced regulations
HUD	Many: Energy assistance, DEI, gender, Fair housing	Many: Nonprofits, IRA/IIJA, Fair housing	Some: Affordable housing, green	Some: Green building	Prioritize places w/drug criminalization policies; limit CDBG and Home benefits	No DEI, no gender, immigration cooperation, limit benefits by citizenship	Less CDBG, "DEI is dead at HUD", nothing gender
DOJ	Many: Gun, crime victim, opioid, women's violence	Many: Universities, nonprofits	Holds on "Sanctuary Cities", says won't follow court order	Coordinated on university clawbacks	Sanctuary City Initiatives, Civil Rights/False Claims initiative	Updated no major changes	Examining grantees for antisemitism
DOL	Many: Global/International programs	Some: Nonprofit cancellations	Defend the Spend, DEI freeze	Unclear	Support for apprenticeships	Cease DEI orders (blocked by court)	No DEI. "Reindustrialization" skilled trades, workforce, Al
HHS (NIH)	Many: Research, public health, education, victims	Many: Gender, DEI, Universities, Public Health,	Manual reviews, delays	Covid-era funds back from state and local governments	Attempted 15% IDC; Communications gag order	Updated with no DEI, nothing for non-citizens	Reduced purview across the board
DOT	Some: Environmental Justice	Some: Unobligated green grants	IRA & IIJA freezes	Unclear	Require Benefit-Cost Analysis for all applications; OZ changes, family req's, more	No-DEI, immigration cooperation	Shift to rural, less climate, Nothing Woke, Family- friendly, Road capacity
USDA	Some: Food assistance, Farmers, climate smart	Some: Local government, school, nonprofit cancellations	Some: IRA pauses	Unclear	Climate data put back online rather than continue court fight; less NEPA required	Updated no major changes	Focusing on farmers, reduce SNAP, innovations, protect taxpayers
DOEd	Some: TQP, SEED	Some: Universities, Maine	Not tracking	Unliquidated ARPA	Not tracking	Not tracking	No DEI, Skilled trades workforce, apprentices, AI
DOEnergy	Some: Private investments in Green Energy	All will eventually be under review	Halted some IRA and IIJA	Unclear	15% IDC for IHLs and 10% for local gov; Website scrubbed	Not updated yet	Remove DEI; Reduce energy, regulation burdens
NEH/Arts	Many nonprofit, universities	Many nonprofit, universities	Some, esp. for DEI	Not tracking	Not tracking	Not tracking	Few DEI, gender, cultural

Color Codes

Aggressive action by Federal Agency, OR Could pose a significant risk to projects

Moderately aggressive action by Federal Agency, OR Could pose a moderate risk to projects

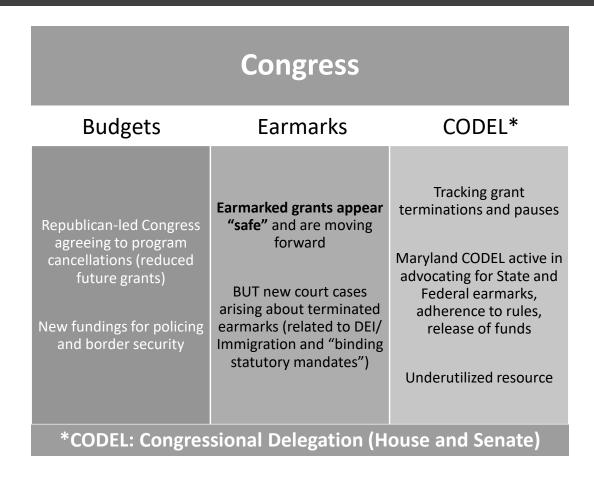
Mild action by Federal Agency, OR Could pose a low risk to projects





Court & Congressional actions are stop and go

Courts Limits Jurisdiction **Topics** Cases so far limiting SCOTUS finding against agency actions on most nationwide injunctions; Fight over District versus topics: Relief/injunctions limited **Claims Court** Immigration cooperation to plaintiffs (often clause, includes Maryland – e.g. IDC limits, Cases being refiled or HHS initially cancelled DEI-certifications/ and then reinstated) thrown out eliminations. they require data Allowing individual grant Cases being appealed to Not much on climate. terminations with specific Circuit and Supreme gender; religion varies Courts (with reasoning, disallowing Findings on Procedural general cancellations unpredictable outcomes) and 1st amendment grounds Court cases starting over (new court, new grounds)







Congressional budgets cut FFA and grants

One Big Beautiful Bill Act (OBBBA) PASSED

- Mandatory spending (cuts Medicaid and SNAP)
- Long-term spending (10 years)
- Tax policy
- Rescinds unobligated Inflation Reduction Act (IRA) (esp. energy grant) funds
- Limits benefits to non-citizens
- More funding for border and justice initiatives

Rescissions Act of July 2025 PASSED

- Rescinds (removes
 Congressional approval) for unobligated funds
- Rescinded future funds for international aid programs and the Corporation for Public Broadcasting (may impact emergency broadcasting)
- More rescissions packages are expected (Education)

FY26 Discretionary Budget (Skinny Budget) IN CONSIDERATION

- Discretionary spending
- Annual agency budgets, including grants
- Would rescind unobligated IIJA (energy, transportation, EJ @ DOT, DOE, EPA)
- Proposes cuts to dozens of programs:
 HUD CDBG, HOME, Continuum of Care
 grants, HHS HIV prevention, CSBG,
 Substance Abuse, Mental Health grants,
 DHS Non-Disaster FEMA programs, DOJ
 Gender programming
- Would add grant funding to immigration enforcement





FY26 Discretionary Budget remains in flux

1. Congressional packages are different from the President's Skinny Budget request

- President requested 23% cut to non-defense spending and elimination or consolidation of specific programs
- House and Senate releasing their versions of appropriations bill, with much lower cuts (if any), ranging around
 6-13%

2. A Court has placed an injunction on enforcement of one clause in the recently-passed OBBBA

- Abortion-clauses, defunding Planned Parenthood, and the 1st Amendment
- Some Congressional Republicans are calling for additional cuts to reduce the deficit in further reconciliation bills
- **3. Expect more rescissions** (Education rescissions are expected)

The annual discretionary budget impacts grants much more directly than the long-term mandatory spending bill.





EXISTING funding varies, FUTURE funding reduced

Existing Federal Funding (Grants in hand)				
Take-home:	Varied impacts to existing grants. Unsigned awards are in limbo.			
Stop-work and Termination Orders	Limited, some being overturned, but Administration using other means to delay funding. Maryland State protected by injunctions (esp. HHS)			
Compliance	Essential to be compliant – A sure route to termination			
Programming	Community Benefits Plans and DEI activities under official stop-work orders; specific grants Few mandated revisions or adoption of new grant terms and conditions yet			
Legal				
Financial	Funds paused despite court orders, Reimbursement rates lagging for some grants and require justification, "Reviews"			
Source	Earmarks progressing normally, Some State Passthrough funds paused (EVs, public health)			
Partners	Nonprofits feeling funding pauses and terminations more acutely; less so government Contractors and businesses beginning to see impacts			
Awarded, unsigned	Little communication or progress on unsigned awards			

Future Federal Funding (Grants to apply for)				
Take-home:	Funds mandated by Congress will be offered, but with new terms and conditions. Less funding available.			
Compliance	 More strings attached; Smaller federal staff w/less capacity & delays Fewer requirements for WBEs/MBEs and lessened NEPA reporting Mandate for increased data sharing and payment oversight 			
Programming	 Programming is expected to change Rural emphasis Traditional transportation options over green/transit Less environmental and climate money Nothing related to race allowed, less DEI or gender funding, prioritize families Less at federal level, possibly more through State (FEMA, Health, Education) Few to no opportunities to help non-Citizens, or for research 			
Legal	 Will need to be willing to accept new Terms & Conditions (T&C): To include requirements such as cooperation with federal immigration or criminalization policies. New T&C allow Federal Termination for "not effectuating policy" 			
Financial	 Expect many fewer grant opportunities. IDC unknown. Costs for applying will likely increase due to legal/BCA requirements 			
Source	Fewer Earmarks offered; they seem to be secure - but this could change			
Partners	Funding to nonprofits is expected to decline significantly: Trump Administration targeting nongovernment organizations			

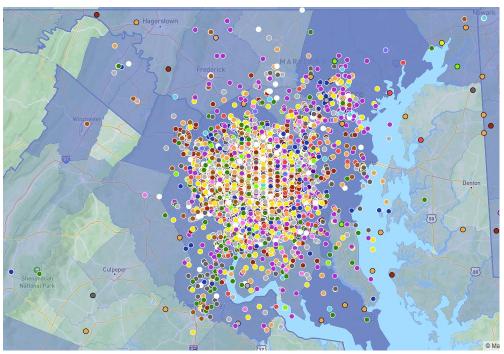




County Government impacts - LIMITED, Nonprofit and community Impacts - SEVERE

	Action by	Immediate Impact on:			
	Federal Government	County Government	Community organizations and Nonprofits		
	Grant Terminations	Limited (only 1 so far)	Loss of a large federal grant/contract often results in layoffs and service gaps that are not easily replaced. Nationwide, 14,000 job losses have occurred among nonprofits (Chronicle of Philanthropy). See: This administration is changing the entire partnership with nonprofits. & Is it a war on nonprofits?		
	Delaying Grant Reimbursements	Local governments may have reserves.	Most Community Organizations cannot be solvent waiting months for reimbursements.		
	Uncertainty of Future Funding	State and local revenue declines and loss of partners may make it hard to meet service levels/needs	Community Organization capacity will be already strained, possibly can't meet demand and maintain staff levels w/out federal funds. 800,000 jobs in the green economy sector expected to be lost; no clear estimates of job creation from tax cuts.		

According to DOGE data, at least 473 contracts/grants to nonprofits and businesses have been terminated or frozen in MD-08 (Raskin) (including Montgomery College)



https://theimpactproject.org/the-impact-map/





Responding

To changes at the federal level

Ignore the headlines, Follow the facts and legal requirements

Judge blocks Trump's federal funding freeze for loans, grants

Get the latest news on President Donald Trump's return to the White

January 28, 2025

Trump White House rescinds order freezing federal spending, reversing course

office came under immense pressure over the impacts of a sudden pause in key government grant

environmental grants, documents show According to an internal email, EPA officials knew they had no contractual right to cancel dozens of grants. They did it

EPA knew it wrongfully canceled dozens of

White House pauses all federal grants, sparking

confusion

Trump administration targets billions in funding

to Harvard

An antisemitism task force will review \$8.7 bil

and its affiliates.

INCOMINA climate nonprofit groups.

E.P.A. Cancels Climate Grants, Intensifying Battle Over \$20 Billion

Here is what we know about the billions in funds that have led to federal investigations, lawsuits and frozen bank accounts for

HHS slashes over \$350M in grant funding for gender ideology, DEI research projects Included among the grants cut was a nearly \$1M project to study 'multilevel and multidimental racism'

Trump Asks Supreme Court to Let Him Cancel Grants to Teachers NEA nixes grant program for 'underserved communities,' shifting priorities

> Montgomery County Office of **Grants Management**

For existing grants: Compliance essential, Compliance will become more complex

Non-Compliance on the part of a grantee gives funders an immediate and legal REASON to terminate for CAUSE. This is the equivalent of a debarment list for federal assistance and is listed on sam.gov for 5 years.

Told not to submit a report? Get everything in writing.

Ask for an official stop-work order.

Reading and education are essential NGMA & GPA memberships useful and full of resources, templates, etc.

Self-advocate.Contact CODEL, Use advocacy materials.

Review everything: NOFOs, grant applications, agreements, amendments, and changes.

They are making changes everywhere.

Empower staff to get help quickly - Agency orders need immediate action.

Enable staff to get quick legal advice and contact subrecipients in the event of a stop-work order.

Be prepared for hard decisions.

Know in advance how to comply.





There is a lot you can do

Change your processes

Risk Assessment and Mitigation

Understand Compliance

Scenario Analysis

Education and Grants Capacity

- Short NOFO = quicker decisions, applications
- Don't delay
- Prepare in advance for desired projects
- 30-day reviews & Certifications need time
- Incorporate multi-step justification process

- Inventory grants for procedural/topical risk
- Read terms and conditions for termination clauses
- Inventory grants for internal financial risk (e.g. staff dependency)
- Spend down, request reimbursement quickly

- Attend webinars
- Read the fine print
- Calendar your requirements
- Stay in contact with your Program Manager; ask about required reports
- Follow your grant
- Follow the CFR

- Model potential effects of a termination or stopwork order.
- Decide in advance whether you will:1) Self-fund and take on the risk of non-reimbursement;2) Stop work
- NGMA and GPA memberships with ondemand resources, webinars and forum discussions are very valuable
- Bring on staff with grants expertise (investment pays off)
- Troubleshooting

Incoming Grants



Follow a simple process to assess risk

Programmatic

Risks

DEI, Immigrants, Gender, Climate, Religion, Criminality, Enforcement, Family planning

Financial Risks

Terminations, Payment pauses, IDC limits; large unspent balances; Mismatch between time elapsed and funds reimbursed

Logistical

Risks

Nonprofit partnerships, Difficulty tracking grants, Forced non-compliance

Continuation risks

Unsigned grants, Reliance on repeated annual grants

STEP 1: Assess External Likelihood and rate High, Medium, or Low

- 1. Are you at risk programmatically? Does your grant cover programs and topics that are being eliminated or disallowed? How many and how integrated into the project are they?
- 2. What is the likelihood that your grant will be terminated?

STEP 2: Assess Internal Impact and Vulnerabilities and rate as Severe, Intermediate, Minor

- Cashflow (%spent versus %reimbursed)
- 2. Dependency of Staff paid by grants
- 3. Financial responsibilities to subawardees, contracts
- 4. Annual reliance (Renewable versus One-time grants)
- 5. Partnerships
- 6. Presence of Alternatives
- 7. Beneficiary impacts (services, jobs, economic-social-environmental)

STEP 3: Add External and Internal together to get risk

1. Take steps to avoid or mitigate your highest risks





Best Practices

Lessons Learned

Best Practices throughout the cycle

APPLYING

- Prepare in advance
- Don't wait!
- Read the NOFO very carefully and address each topic and evaluation criteria
- Shoot for every evaluation point you can
- Decide if avoiding "topics of interest" is right for you
- Be prepared to sign certifications and assurances truthfully if you apply
- Involve CODEL or State Representatives

COMPLYING

- Know your grants and where they stand
- Calendar your reports
- Document everything in writing; write back for clarification
- Understand that the Program Officers still employed and working want you to succeed, they are not looking to trip you
- Stay on top of contact information (sam.gov, eBiz)
- Check all communications avenues regularly
- Follow your grant's plan

SURVIVING

- Make hard decisions in advance
- Be able to describe "WHY" in detail (beneficiaries, \$ impact, etc.)
- Appeal the squeaky wheels are more likely to make it through
- Fight what you can join lawsuits if that is right for you (e.g. Lawyers for Good or your own legal action), or approach CODEL

THRIVING

- Embrace the challenge!
- Pivot to private or State non-federal sources (be able to measure your success and revise applications)
- Stay on top of State
 opportunities there are
 dozens (MEA alone has 19)
- Charge IDC and/or Administration fees every place you can
- You may be able to recoup IDC up to two years after a project is done if you left grant money on the table





Best Practice: Communicate with CODEL

Communicate with your Congressional Delegation and your State Legislative Representatives

They have a lot on their plate – don't assume they know what is happening to grants!

Feed CODEL with specific, detailed information (e.g. the timing when grants.gov went down; or the number and time and deadlines for short-window NOFOs)

Squeaky wheels protect and win grants.







Best Practice: Plan ahead



Matthew Hanson, CGMS, GPC . 1st

Managing Director | Full Grants Lifecycle SME | NGMA Public Sector Impact Award ...

Compressed Grant Timelines Signal Quiet Recission Activity

On the heels of USDOT and other recent grant releases, the sudden release of seven FEMA grant programs posted yesterday—due August 11, is more than a scheduling issue—it's yet another form of programmatic rescission by the current administration. Whether it's through impoundment, legislative rescission, pocket recission or quiet NOFO manipulation, the message is clear: communities must be ready to act—fast.

Yes, advocacy matters. But so does action.

There is no reason to wait for a specific Notice of Funding Opportunity (NOFO) to begin preparing your materials or securing grant writing support.

- § The hardest part of any application? Assembling strong, current programmatic content. And that content is valuable far beyond a single grant submission.
- Use it for a general fund proposal
- Adapt it for bond or financing packages
- Pitch it for public-private partnerships
- ✓ Keep it ready for the next NOFO

Solid program information is your most strategic asset—don't wait until the clock is ticking to build it.

#GrantsManagement #FederalFunding #PublicSectorStrategy #GrantProfessionals #GovernmentFinance #InfrastructureFunding #NOFOReadiness #LocalGovernment

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Best Practice (the 4 P's):

Identify your Priority and Pipeline Projects and Pre-prepare:

- What is a <u>priority</u> that you need funded? Write it down and describe why it is worth funding.
- What do you have that is already progressing in the <u>pipeline</u>? Has it already started in some way (e.g. plan or engineering design or training materials, etc.) and is it "shovel-ready"?
- Organize and write it up as a <u>project</u>: Goals, Objectives, Actions, Indicators, <u>AND</u> Budget
- <u>Pre-prepare</u>: Don't wait for the NOFO. Get started now and have a plan for how you will respond to a NOFO when it posts.

People who follow the 4 P's win grants!





Lesson Learned: Don't hesitate

US DOT Low and No Emissions Grant Program NOFO

Applicant Certification

The applicant assures and certifies, with respect to any application and awarded Project under this NOFO, that it will comply with all applicable Federal laws, regulations, executive orders, policies, guidelines, and requirements as they relate to the application, acceptance, and use of Federal funds and will cooperate with Federal officials in the enforcement of Federal law, including cooperating with and not impeding U.S. Immigration and Customs Enforcement (ICE) and other Federal offices and components of the Department of Homeland Security in and the enforcement of Federal immigration law.

Lesson Learned: Don't be scared off by this language!

Check with your lawyers. If you follow the law, then you are eligible. (Disclaimer: This is not legal advice and does not replace consulting your attorney).

US DOJ Enforcement of Cybercrimes Program NOFO

- (2) An assurance that, not later than 30 days before the application (or any amendment to the application) was submitted, the application (or amendment) was submitted for review to the governing body of the State, Tribe, or unit of local government (or to an organization designated by that governing body);
- (3) An assurance that, before the application (or any amendment to the application) was submitted, the application (or amendment) was made public and an opportunity to comment on the application (or amendment) was provided to citizens, to neighborhood or community-based organizations, and to victim service providers, to the extent applicable law or established procedure makes such an opportunity available;

Lesson Learned: Don't wait!

Waiting until less than 30 days to start an application meant this assurance could not be signed truthfully.





Questions and Resources

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