



Faith-Based Security Advisory Council

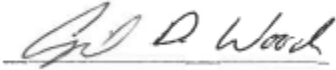
Grants and Resources Subcommittee

Faith-Based Security Advisory Council
June 6, 2023



Homeland
Security

This publication is presented on behalf of the Faith-Based Security Advisory Council (FBSAC), Grants and Resources Subcommittee, Chaired by April D. Wood and Vice-Chaired by Reverend Dr. Gabriel Salguero to the Secretary of the Department of Homeland Security (DHS), Alejandro N. Mayorkas.



April D. Wood, Chair

President and CEO

National Voluntary Organizations
Active in Disaster



Reverend Dr. Gabriel Salguero, Vice Chair

President and Founder

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GRANTS AND RESOURCES SUBCOMMITTEE

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EXECUTIVE SUMMARY

In January 2023, the Secretary tasked the Faith-Based Security Advisory Council (FBSAC) to form a subcommittee on Grants and Resources to develop recommendations on how the Department can most effectively and appropriately share resources that meet the needs of diverse faith-based organizations and communities, including remedying challenges to applying for Department of Homeland Security (DHS) grants. The Secretary specifically set the following two taskings:

1. Provide recommendations for how the Department can most effectively and appropriately address challenges to applying for DHS grants for which faith-based organizations are eligible, as well as how best these grants can meet the needs of faith-based organizations; and
2. In addition to relevant DHS grants, provide recommendations for how the Department's existing resources can better meet the needs of diverse faith-based organizations and communities. This includes recommendations for the development and implementation of specific best practices to prevent, protect against, respond to, and recover from acts of targeted violence or terrorism, major disasters, cyberattacks, or other threats or emergencies while preserving individual privacy and civil rights and civil liberties.

FRAMING

It is a tenet of the founding mission of this country that it is the fundamental right of every individual to be able to worship in freedom and safety. In addition to supporting the spiritual and communal needs of this country, a 2016 studyⁱ estimated that faith-based institutions contribute \$1.2 trillion in socioeconomic value to the U.S. economy. Across this country, many members of faith-based institutions make these contributions to society under the increasing threat of risks to their personal safety. In many cases, groups targeted for hate crimes and violence also face numerous challenges of social vulnerability, including lack of adequate access to education, housing, healthcare, food, and transportation. While the scope of the taskings focused on existing resources, more resources are needed to protect the safety of the faith community and houses of worship.

METHODOLOGY

The subcommittee compiled its recommendations over five collaborative group sessions throughout April and May 2023, following a briefing period that extended from March 2023 to April 2023. Over the course of the entire 120-day period, the subcommittee met with representatives, subject matter experts, and select leadership from DHS offices and components and external stakeholders with a goal of providing recommendations for how the Department can most effectively and appropriately address challenges to applying for DHS grants for which faith-based organizations are eligible, and how the Department's

existing resources can better meet the needs of diverse faith-based organizations and communities.

The subcommittee drew upon the knowledge it gained from briefings with the Cybersecurity and Infrastructure Security Agency (CISA), the Federal Emergency Management Agency (FEMA), Secure Community Network, Sikh-American Legal Defense and Education Fund (SALDEF), Arizona Department of Homeland Security (AZDOHS), Administration/Grants Bureau, DC Homeland Security and Emergency Management Agency (HSEMA), and DHS Center for Prevention, Programs, and Partnerships (CP3). Based on the input from experts, supplemental research, and the expertise and experience of its members, the subcommittee worked to identify substantive and meaningful recommendations to support and enhance DHS's grants and resources opportunities with its faith-based organization (FBO) partners.

The subcommittee was deeply appreciative of, and highly impressed with, the professional staff at every level of the process, both those who supported the work of the report, and the interviewees who devoted their time and expertise to facilitating the subcommittee's research.

KEY OBSERVATIONS

Through its research, the subcommittee found that the essential help and support offered by DHS to faith communities has consistently increased over time, notably including improvements to the online form in the current 2023 grant cycle. These efforts reflect the genuine commitment on the part of DHS to help keep communities safe. Several of the subcommittee's key findings highlight ways that DHS can better support communities, especially in cases where those communities are under-resourced, highly targeted, and socially vulnerable. Some of the subcommittee's recommendations in addressing these needs can be applied to the work referenced by both tasking questions. The subcommittee offers recommendations as to ways that DHS can deploy staff, create, and disseminate digital and other resources, and work with communal leadership and communal media to improve communication, outreach, education, and collaboration.

Insofar as this report makes recommendations regarding optimal deployment of staff and resources, the focus in several areas, especially as it relates to the Nonprofit Security Grant Program (NSGP), should be on directly resolving problems with the grant application structure and process ensuring alignment with 6 U.S.C. § 609a(f)(2) guidelines for grant administration. While additional staff and resources will help communities better cope with difficulties in the process, resolving those challenges directly should be the priority. Issues include:

- Reimbursement-based grants create significant obstacles to under-resourced and socially vulnerable communities;
- Lack of suggested projects and sample language place the burden on lay persons without the needed expertise to reinvent the wheel for each application and guess

what language and framing is needed. The programs should support faith communities by providing models for best practices to keep them safe, and specific suggested language for how to describe those security changes they wish to implement, and the support needed;

- Highly complicated applications that are hard to successfully complete without subject matter expertise in both security and grant writing;
- Inconsistent application deadlines across State Administrative Agencies (SAAs), including some that leave little time to apply after FEMA guidelines are released; and
- Lack of feedback to sub-applicants on reasons for application rejections.

Corrections to these issues would better align the grants program with 6 U.S.C. § 609a(f)(2) as well as President Biden’s Executive Order (EO) 14058 of December 13, 2021, *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*,ⁱⁱ directing agencies to improve the overall experience for customers accessing government services and benefits.

In keeping with Foundations for Evidence-based Policymaking Act of 2018,ⁱⁱⁱ additional steps should be taken to leverage federal data sources including from the U.S. Census, the Community Resilience Score, and the Social Vulnerability index, which would help with continuous quality improvement of the program. Also, making publicly available the information collected annually as described in 6 U.S.C.§ 609a(e) and 6 U.S.C.§ 609a(f)(2) would advance the Secretary’s goal of equity and efficacy in distribution of resources. Information needed includes multivariable analyses of the communities, including threat level by region, identity demographics, social vulnerability, and other factors. Additionally, analysis of how these factors correlate with statistics regarding those who do and do not succeed in obtaining grants, and monies returned due to inability to complete the granted projects, would help improve the program and make it more equitable.

Highlights of the changes needed are:

Goal	Current state	Recommended steps
Equity in access to grants regardless of state.	Inconsistent deadlines across states including some that leave no meaningful time for application.	Ensure application deadlines and policies are consistent so that all FBOs have equal opportunity to apply regardless of their state. Support legislation to extend the time in which sub-applicants can apply and stipulate minimum time periods of no less than 60 days after FEMA’s release of the Notice of Funding Opportunity (NOFO) for sub-applicants to apply.
Equity in access to grants regardless of ability to purchase equipment on a reimbursement-only basis.	Reimbursement-based grants that present a significant obstacle to socially vulnerable, under-	Money-up-front grants or waivers by eligibility that allow institutions to purchase approved items, or

	resourced, and economically disadvantaged communities.	Milestone-based grants that provide money-up-front based upon proof of successful implementation by stage.
Equity in access to grants regardless of barriers including English language proficiency and government grant-writing expertise.	Highly complicated application with limited access to technical assistance, which is inconsistent with reasonable expectations for sub-applicant expertise.	Build capacity for under-resourced communities by creating additional resources to clarify NOFO, sample language, and sample suggested projects to keep houses of worship safe. Improved outreach to ethnic and religious media and community leaders.
Equity in access to data and NSGP-related information in an available, user-friendly format that allows FBOs and houses of worship to understand and remedy grant denials, and self-advocate for their community.	No information on rejected applications as to the reason for rejection. No publicly available data sets on how grants awarded correlate to annual statistics on threat level by region, demographics, social vulnerability, and other factors.	Publicly available data sets (de-identified and anonymized to protect the privacy and safety of the individual institution) that allow for continuous quality improvement of the NSGP. Focus on data-driven efforts to help underserved and under-resourced communities in building capacity in terms of successful grant applications and self-advocacy. Easily available data for FBOs seeking grants to increase trust and to ensure due process and civil rights for all sub-applicants. Align NSGP with Foundations for Evidence-Based Policymaking Act of 2018.

KEY FINDINGS AND RECOMMENDATIONS

The recommendations put forth in this report are broad, to provide a wide berth for the Secretary to identify appropriate policy and operational responses. The subcommittee worked to identify areas for improvement and offer practical and well-resourced recommendations to help improve communication, access, and collaboration with faith-based and community partners.

The following recommendations are made via the subcommittee’s assessment of potential agency enhancements across the enterprise, to include increased connectivity with state, local, tribal, and federal law enforcement. Notably, the below recommendations, contextualized from the key findings, are focused largely on increasing access to information for underserved communities, and facilitating the grant application process for grantees and sub-applicants.

Ongoing DHS support for faith communities and houses of worship makes a sustained and steadily increasing impact. The subcommittee members, reflecting on their own insights as subject matter experts, highlighted multiple areas worthy of commendation, especially:

- **Commendation #1:** The subcommittee commends DHS for the use of data to create bonus points for first-time sub-applicants and those in areas of high social vulnerability.
- **Commendation #2:** The DHS offices focused on faith-based outreach, such as the Office of Partnership and Engagement and the DHS Center for Faith-Based and Neighborhood Partnerships, have been instrumental in serving and connecting key networks and local faith and community leaders to the ongoing work of DHS. Their efforts are notable and worthy of further investment and expansion.
- **Commendation #3:** Support of DHS and affiliated agencies has helped to thwart or lessen the impact of potential or actual incidents.
- **Commendation #4:** The budget increase for administrative funding (up to five percent) has helped organizations and institutions carry out grant programs.
- **Commendation #5:** The NSGP sub-applicant form was simplified within the 2023 cycle.

Key Finding #1: Sub-applicant deadlines and guidelines vary greatly by state, which often causes confusion. Some state deadlines and guidelines leave little-to-no time between the release of FEMA guidelines and the SAA application deadline.

- **Recommendation:** The Department should support legislation to extend time in which sub-applicants can apply and have minimum time periods of no less than 60 days to apply.

Key Finding #2: Marginalized and minority houses of worship encounter difficulty accessing DHS resources and grants. In addition, underserved communities have difficulties completing the grants process due to financial challenges within the existing reimbursement model and lack of access to critical data documenting threat levels.

- **Recommendation:** Expand resource accessibility through increased translation services, networks, and outreach through the following actions:
 - Increase DHS outreach and presence in faith-based communities and gatherings to host outreach and training sessions;
 - Increase DHS outreach to ethnic and religious media about grant programs, including sending these media outlets the NSGP NOFO;
 - Increase DHS outreach by leveraging the existing platforms of interfaith networks, denominational gatherings, and intermediaries and local groups, and host outreach and training sessions;
 - Optimize and publicize use of the Protective Security Advisors (PSAs) network in an efficient manner. Recommend PSAs proactively approach the faith and interfaith communities (e.g., actively engaging during network meetings, denominational gatherings and attend and present in those places as opposed to people going out of their way to reach out to them);
 - Expand PSA resources and language accessibility through increased translation services;

- Conduct outreach to new sub-applicants in a more consistent manner; and
- Leverage existing networks such as state/local Voluntary Organizations Active in Disaster (VOAD) for information sharing and trust building with community leaders and influencers.
- **Recommendation:** Conduct an audit of grantees and sub-applicants to identify and highlight which communities are underserved and disconnected from the grant processes; identify levels of threat directed toward specific communities.
 - Create intentional outreach and technical assistance to identified underserved communities.
 - Identify communities that have best practices to share as a resource for new grantees and sub-applicants.
- **Recommendation:** Invite successful sub-applicants to address and share best practices for applying, in order to:
 - Increase awareness of the benefits of these grants and resources through testimonies and “so what” impact statements.
 - Expand the amount of entry points to DHS resources with attention to marketing and promoting those points of entry among underrepresented groups.
 - Leverage partnerships with interfaith networks and local communities to accomplish this.
- **Recommendation:** Switch from a reimbursement model to a “grant up front” model for all sub-applicants or, at a minimum, for sub-applicants who meet certain thresholds of demonstrated financial need, through the following actions:
 - Create a “waiver” program for sub-applicants whose financial resources may prohibit the use of a reimbursement model. Institutions that meet certain budget thresholds and/or social vulnerability thresholds would be eligible to receive funds in advance to carry out approved projects.
 - Mandate a milestone reimbursement structure or another mechanism to pre-pay grants such as the NSGP in segments to provide under-resourced recipients with the resources they need to use the grants.
 - Update DHS timelines to reflect realistic financial situations of non-profits in terms of successfully carrying out projects.
 - Design a template on how to disburse funds and to walk sub-applicants through pain points in that process.
- **Recommendation:** Address the shortage and inaccessibility of data pertaining to hate crimes and heightened threat levels; encourage PSAs to help potential grantees tell their story by facilitating access to critical threat data highlighting their threat levels.

Key Finding #3: When acts of terrorism or threats of violence occur, local underserved communities and their response and recovery efforts are disconnected from the greater

systems. Efforts to respond to acts of terrorism or threats of violence and/or emergencies in many underserved communities still need support connecting to larger efforts. The larger system can also benefit from collecting intelligence from impacted local, underserved communities.

- **Recommendation:** Leverage and coordinate the relationships between the faith-based offices and community-based networks, through the following:
 - Leverage offices focused on faith-based equities for outreach to the impacted communities;
 - Leverage ethnic and religious media to identify local contacts who are working on the ground and learn what local efforts are being done to lift and strengthen affected communities;
 - Proactively invest resources in DHS offices focused on faith-based outreach in building networks and establishing points of contact with underserved communities before disaster occurs;
 - Coordinate a rapid response with state, local, and tribal leadership to bring greater resources and coordination using a multi-agency approach;
 - Leverage and coordinate with existing networks such as state/local VOAD and other interfaith networks;
 - Identify/create and use a list of ethnic and religious media in all departments/divisions; and
 - Leverage data-driven efforts to help underserved communities in building capacity (i.e., technical assistance, direct service, and/or disaster response training) in terms of successful grant applications.

Key Finding #4: While the NSGP funding has increased, the overall grants management system remains underfunded. For the NSGP, the five percent devoted to grants management and administration is not enough. Low staffing and lack of redundancy in FEMA Grant Programs Directorate (GPD) increases risk and a lack of continuity. The current needs heavily outweigh the resources available.

- **Recommendation:** DHS should support legislation to increase the budget, supplementing efforts to increase support staff and enhance internal and external training as applicable, as well as hire new staff.
 - Implement a process of knowledge sharing and capacity building within the FEMA GPD and the SAAs to ensure that the domain and subject matter expertise that is available with a few key personnel does not potentially become a bottleneck in the future or a single point of failure.
- **Recommendation:** Implement a capacity building component in grant applications with a focus on underrepresented and newer sub-applicants.
 - Increase funding and staff to manage and act on an outreach effort.

- Introduce a feedback loop for sub-applicants after they submit their application to address the unequal relationship between applicant and sub-applicant that places the burden of work on the sub-applicant.
- **Recommendation:** Create a process to address feedback from SAAs to sub-applicants whose applications were rejected to improve those sub-applicants' chances for future applications, as described in U.S.C. § 609a(f)(2)(C).

Key Finding #5: There does not appear to be a continuous, data-informed quality improvement system for the NSGP consistent with 6 U.S.C. § 609a(e), U.S.C. § 609a(f)(2)(D), the Foundations for Evidence-based Policymaking Act of 2018, and the January 2021 Presidential Memorandum, *Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policy Making*.^{iv}

- **Recommendation:** Create and implement a data-driven process of continuous quality improvement, consistent with periodic evaluation of the DHS grants, that includes:
 - Feedback from grantees;
 - Information on granted funds returned unused, and why;
 - Feedback for sub-applicants when their application is rejected so they can improve their application and reapply; and
 - The creation of a continuity committee or advisory board to evaluate ongoing progress on previous recommendations and ensure continuous quality improvement.

Key Finding #6: Many faith organizations lack capacity and the NSGP grant application process is often cumbersome and difficult to navigate for new and emerging sub-applicants. This is primarily due to the technical nature of the language, which creates barriers for sub-applicants that need it the most. For under-resourced and socially vulnerable organizations, especially new and emerging grantees, the lack of equitable access to resources such as consultants, or comparable technical expertise and support, is a disadvantage when applying for NSGP grants.

- **Recommendation:** DHS should support legislation to increase funding for additional outreach efforts to support under-resourced and socially vulnerable communities who may be helped by the NSGP. Such assistance would further the aims described in U.S.C. § 609a(f)(2)(A), including outreach, engagement, education, and technical assistance and support to eligible nonprofit organizations as described in subsection (b). With particular attention to those organizations in underserved communities, before, during, and after the awarding of grants, including web-based training videos for eligible nonprofit organizations that provide guidance on preparing an application and the environmental planning and historic preservation process.

- **Recommendation:** Optimize PSAs and increase the PSA workforce as an alternative option for communities that cannot afford to hire consultants to create further equity in the system and the process.
- **Recommendation:** Continue to reduce the complexities of the application, and simplify the language on proposals, to minimize the dependency on grant writing consultants, which can often create disadvantages for sub-applicants who lack the resources to hire this type of support. In addition, there have been cases of consultants that do not customize their proposal to the expertise, needs, and realities of the sub-applicant.
- **Recommendation:** Proactively reach out to under-resourced and socially vulnerable groups to provide training focused on supporting FBOs with navigating the application process and best practices from previous sub-applicants.

CONCLUSION

The subcommittee found the DHS grants programs helped decrease potential attacks in vulnerable communities. For those who have been able to access the grants, it has been instrumental in developing lifesaving safety procedures and protocols. The committee commends these notable efforts of an under-resourced Department even as it calls for needed growth and expansion in key areas moving forward.

There are several challenges that remain around areas of accessibility, particularly among certain underrepresented groups and newer organizations seeking grants. Innovative methods should be implemented to increase both outreach and feedback to these communities. The subcommittee found that partnerships and continued communication with umbrella organizations and local partners are essential to overcoming these outreach and feedback chasms. Additionally, enhanced guidance for SAAs is critical, and the importance of feedback and outreach is crucial for expanding impact and outreach.

APPENDIX 1: TASKING LETTER

MEMORANDUM FOR: Kiran Kaur Gill
Chair, Faith-Based Security Advisory Council

CC: Julie Schonfeld
Vice Chair, Faith-Based Security Advisory Council

FROM: Alejandro N. Mayorkas
Secretary

SUBJECT: New Faith-Based Security Advisory Council Subcommittees and Taskings

I respectfully request that the Department of Homeland Security's (DHS) Faith-Based Security Advisory Council (FBSAC) form three subcommittees to provide findings and recommendations in these critical areas of the Department's work:

1. How the Department can more efficiently and effectively share information to enhance the security and preparedness of places of worship, faith communities, and faith-based organizations.
2. How the Department can most effectively and appropriately share resources that meet the needs of diverse faith-based organizations and communities, including remedying challenges to applying for DHS grants.
3. How the Department can build trust and resilience with faith community stakeholders.

These subjects are described in greater detail below. My staff will follow up with you shortly regarding formation of the subcommittees.

I request that the FBSAC submit its findings and key recommendations to me no later than 120 days from the date of this memorandum, consistent with applicable rules and regulations.

Thank you for your work on these important matters, your service on the FBSAC, and your dedication to securing our homeland.

Information Sharing

To protect faith-based organizations and all members of the public, we must prioritize timely two-way sharing of threat and security-related information with faith-based organizations.

This subcommittee is tasked to:

Review and assess the efficiency and effectiveness of the Department's information sharing to enhance the security and preparedness of places of worship, faith communities, and faith-based organizations. This includes recommendations for new information-sharing mechanisms, whether via existing information-sharing platforms or networks, or by creating a new process that will effectively communicate threat information and other relevant federal resources to faith communities of diverse backgrounds.

DHS Grants and Resources

Following the hostage situation at the Congregation Beth Israel synagogue in Colleyville, Texas, I called for an increase in funding for the Nonprofit Security Grant Program (NSGP). This program provides essential resources to help protect nonprofit organizations at risk of terrorist attacks. In Fiscal Year 2022, Congress provided \$250 million for the NSGP, an increase of \$70 million from the prior year. For Fiscal Year 2023, Congress increased the NSGP funding to \$305 million, a 22% increase on Fiscal Year 2022. These increases allowed more nonprofit organizations across the nation to make physical security enhancements to help protect against attacks. These increases also enable DHS to expand participation in this critical program and increase our support to historically marginalized communities and Historically Black Colleges and Universities in an effort to build capacity and address an evolving threat environment. One of my priorities is to ensure equity in all DHS grant awards.

This subcommittee is tasked to:

- a. Provide recommendations for how the Department can most effectively and appropriately address challenges to applying for DHS grants for which faith-based organizations are eligible, as well as how best these grants can meet the needs of faith-based organizations, and;
- b. In addition to relevant DHS grants, provide recommendations for how the Department's existing resources can better meet the needs of diverse faith-based organizations and communities. This includes recommendations for the development and implementation of specific best practices to prevent, protect against, respond to, and recover from acts of targeted violence or terrorism, major disasters, cyberattacks, or other threats or emergencies while preserving individual privacy and civil rights and civil liberties.

Building Partnerships

DHS is defined by its partnerships—not only with law enforcement, emergency responders, and our international partners, but also with the diverse communities we serve. To protect the homeland, we must have strong relationships with these communities and work in partnership to build strong, resilient communities.

This subcommittee is tasked to:

Provide recommendations for how the Department can build trust with faith community stakeholders to better understand their concerns, including real or perceived threats from violent actors or groups, and empower local leaders to mobilize resources to mitigate and respond to threats.

APPENDIX 2: SUBJECT MATTER EXPERTS AND OTHER WITNESSES

Debbie Gottlieb	Grants Director	Secure Community Network
Cheryl Kennedy	Assistant Director – Community Preparedness	Arizona Department of Homeland Security (AZDOHS)
Charles Madden	Grants Bureau Chief	Administration/Grants Bureau, DC Homeland Security and Emergency Management Agency (HSEMA)
Asma Noray	Grants Manager	DHS Center for Prevention, Programs, and Partnerships (CP3)
Susan Schneider	Branch Chief, Active Assailant Security	Office of Security Programs, CISA
Mark Silveira	Senior Advisor, Branch Chief	Grants Programs Directorate, FEMA
Jyot Singh	Resource Manager	Sikh-American Legal Defense and Education Fund (SALDEF)
Dena Weiss	Assistant Director	Secure Community Network

APPENDIX 3: ENDNOTES

ⁱ **The unseen economic and social impacts of American faith** |

<https://www.deseret.com/faith/2021/5/12/22429166/the-unseen-economic-social-impact-of-american-faith-brian-grim-religious-freedom-business-foundation>

ⁱⁱ **Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government** | <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/12/13/executive-order-on-transforming-federal-customer-experience-and-service-delivery-to-rebuild-trust-in-government/>

ⁱⁱⁱ **Foundations for Evidence-based Policymaking Act of 2018** |

[https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjsm5mSm4__AhVYCTQIHf-](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjsm5mSm4__AhVYCTQIHf-8AB8QFnoECBYQAQ&url=https%3A%2F%2Fwww.whitehouse.gov%2Fwp-content%2Fuploads%2F2021%2F06%2FM-21-27.pdf&usg=AOvVaw0kOJmQ4Eu2Kfh3p8uD75Rr)

[8AB8QFnoECBYQAQ&url=https%3A%2F%2Fwww.whitehouse.gov%2Fwp-content%2Fuploads%2F2021%2F06%2FM-21-27.pdf&usg=AOvVaw0kOJmQ4Eu2Kfh3p8uD75Rr](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjsm5mSm4__AhVYCTQIHf-8AB8QFnoECBYQAQ&url=https%3A%2F%2Fwww.whitehouse.gov%2Fwp-content%2Fuploads%2F2021%2F06%2FM-21-27.pdf&usg=AOvVaw0kOJmQ4Eu2Kfh3p8uD75Rr)

^{iv} **OMB M-21-27: Guidance worth getting excited about** | <https://www.evaluation.gov/2021-09-27-OMB-M-21-27-guidance/>