




FEMA

Grant Programs Directorate Information Bulletin
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MEMORANDUM FOR: All State Administrative Agency Heads
All State Administrative Agency Points of Contact
All State Homeland Security Directors
All State Emergency Management Agency Directors
All State Hazard Mitigation Officers
All State Floodplain Managers
All Tribal Nation Leaders
All Tribal Nation Points of Contact
All Eligible Regional Transit Agencies
All Private Sector Transportation Security Partners
All Public and Private Sector Port Security Partners
All Assistance to Firefighters Grant Program Recipients
All Staffing for Adequate Fire and Emergency Response Grant Program Recipients
All Fire Prevention and Safety Grant Program Recipients

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SUBJECT: **Good Jobs and Safe Workplaces Best Practices for
DHS/FEMA Disaster and Non-Disaster Grant Programs**

I. Purpose

This Information Bulletin (IB) explains the Federal Emergency Management Agency's (FEMA) current policy on existing employment and labor laws and encourages recipients and subrecipients to take every step possible to create working conditions aligned with the Department of Labor (DOL) and Department of Commerce's Good Jobs Principles.

This IB explains FEMA's recommended best practices for supporting good jobs in the administration of Department of Homeland Security (DHS) / FEMA grant programs.

II. Applicability

This IB is applicable to all recipients and subrecipients of disaster and non-disaster grants administered by FEMA.

III. Guidance

A. Authorities

1. Federally funded recipients and subrecipients should be mindful of all federal, state, local, tribal and territorial laws protecting and providing rights to workers. The following authorities are most relevant to the topics covered in this IB:
 - a. Fair Labor Standards Act, Title 29 United States Code. Section 201, et seq.
 - b. False Claims Act, Title 31 United States Code. Sections 3729-3733.
 - c. National Labor Relations Act, Title 29 United States Code Section 151, et seq.
 - d. Occupational Safety and Health Act, Title 29 United States Code. Section 651, et seq.
 - e. Section 504 of the Rehabilitation Act of 1973, Title 29 United States Code. Section 794
 - f. Title VII of the Civil Rights Act of 1964, Title 42 United States Code Section 2000e, et seq.
 - g. Title IX of the Education Amendments of 1972, Title 20 United States Code Section 1681, et seq.
 - h. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, including 2 Code of Federal Regulations. Section 200.300(a) (general federal statutory requirements for pass-through entities), Section 200.332(e) (monitoring requirement to ensure compliance with applicable federal law), Section 200.339 (remedies for noncompliance), and Appendix II (Contract Provisions for Non-Federal Entity Contracts Under Federal Awards).

B. Existing Labor and Employment Law Requirements

Below, FEMA emphasizes **existing** labor and employment laws applying to DHS/FEMA disaster and non-disaster funded projects. Additionally, it **encourages** recipients and subrecipients to improve the quality of jobs to attract and retain talent.

DHS/FEMA is committed to ensuring the fair treatment and safety of workers in activities relating to federally funded disaster and non-disaster grant programs. These workers perform essential work, in some cases, under the worst of circumstances. It is encouraged, then, that DHS/FEMA funded recipients and subrecipients take steps to ensure they meet basic employment and labor requirements when carrying out DHS/FEMA disaster and non-disaster funded projects.

When workers are paid fair wages on time, at safe, healthy, and accessible workplaces, they perform well. When a project has less turnover because of favorable working conditions, the work performed is more cost efficient.

- a. Existing labor and employment obligations:** DHS/FEMA-funded recipients and subrecipients must be mindful of existing labor and employment obligations to provide safe work environments and fair, timely payment to their employees. Recipients and subrecipients of DHS/FEMA funding must also ensure that their contractors and subcontractors are mindful of such requirements. FEMA emphasizes the following obligations as being of high importance on FEMA-funded programs:
- i. Preventing wage theft and ensuring the timely payment of wages to all workers, as well as compliance with all applicable federal, state, tribal, and local wage and hour laws.
 - ii. Providing for worker health and safety in compliance with applicable federal, state, local, tribal, and territorial worker safety laws.
 - iii. Ensuring that workers have a free and fair choice to organize, where applicable.
 - iv. Preventing retaliation in violation of applicable law against workers who report, discuss, or raise concerns about wages, working conditions, or equity with others.
 - v. Monitoring compliance with applicable federal labor and employment law requirements for FEMA disaster and non-disaster funded projects consistent with the terms of the grant award, including the requirements for pass-through entities at Title 2 Code of Federal Regulations Sections 200.300 and 200.332.

C. Encouraged Good Job Principles

- 1. Creating Good Jobs:** Wherever possible, the Biden-Harris Administration is committed to using federal projects to create the types of jobs that help workers get ahead, not just get by. In 2022, the DOL and Department of Commerce published the [Good Jobs Principles](#). This shared federal vision of job quality has since impacted billions in the generational federal investments made in communities through the American Rescue Plan Act, the Bipartisan Infrastructure Law, the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act, and the Inflation Reduction Act. The Biden-Harris Administration’s commitment to job quality was reaffirmed in [Executive Order 14126](#), *Investing in America and Investing in American Workers*, which President Biden signed in September 2024.

DHS/FEMA encourages recipients and subrecipients, to the extent possible under all applicable laws, to take every step possible to create working conditions aligned with the [Good Jobs Principles](#). Below is a list of Good Jobs Principles which highlight the steps that recipients, subrecipients, contractors and subcontractors can take to align with these efforts. The examples below are not exhaustive, meaning other steps not described here could also align a worksite with the Good Jobs Principles.

For more information and tools helpful in creating good jobs, please visit [The Good Jobs Initiative | U.S. Department of Labor \(dol.gov\)](#).

- **Recruitment and Hiring:** Qualified job applicants are actively recruited – especially those from underserved communities. Job applicants are free from discrimination, including unequal treatment or application of selection criteria that

are unrelated to job performance. Job applicants are evaluated with relevant skills-based requirements. Unnecessary educational, credentials and experience requirements are minimized.

- **Benefits:** Full-time and part-time workers are provided family-sustaining benefits that promote economic security and mobility. These include health insurance, a retirement plan, workers' compensation benefits, work-family benefits such as paid leave and caregiving supports, and others that may arise from engagement with workers. Workers are empowered and encouraged to use these benefits.
- **Diversity, Equity, Inclusion, and Accessibility (DEIA):** All workers have equal employment opportunity. Employers provide anti-harassment policies and trainings. Workers are respected, empowered, and treated fairly. DEIA is a core value and practiced norm in the workplace. Individuals from underserved communities face systemic barriers in the workplace. Underserved communities are persons adversely affected by persistent poverty, discrimination, or inequality, including Black, Indigenous, and other people of color; LGBTQ+ individuals; women; immigrants; veterans; individuals with disabilities; individuals in rural communities; individuals without a college degree; individuals with or recovering from substance use disorder; and justice-involved individuals. Barriers to underserved communities accessing employment are addressed by ensuring they have access to childcare, transportation, healthcare, and other supportive services.
- **Empowerment and Representation:** Workers can form and join unions. Workers can engage in protected, concerted activity without fear of retaliation. Workers contribute to decisions about their work, how it is performed, and organizational direction.
- **Job Security and Working Conditions:** Workers have a safe, healthy, and accessible workplace, built on input from workers and their representatives. Workers have job security without arbitrary or discriminatory discipline or dismissal. They have adequate hours and predictable schedules. The use of electronic monitoring, data, and algorithms is transparent, equitable and carefully deployed with input from workers. Workers are free from harassment, discrimination, and retaliation at work. Workers are properly classified under applicable laws. Temporary or contractor labor solutions are minimized.
- **Organizational Culture:** All workers belong, are valued, contribute meaningfully to the organization, and are engaged and respected especially by leadership. Widely accepted practices and strategies are adopted to improve the culture of the workplace.
- **Pay:** All workers are paid a stable and predictable living wage before overtime, tips, and commissions. Workers' pay is fair, transparent, and equitable. Workers' wages increase with increased skills and experience.
- **Skills and Career Advancement:** Workers have equitable training opportunities and tools to progress to future good jobs within their organizations or outside them. Workers have transparent promotion or advancement opportunities. Workers have access to quality employer- or labor-management-provided training; instituting registered apprenticeship programs that include training, advancement, and promotion opportunities; and education.

IV. Questions

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

V. Review Date

This IB will be reviewed within four years of the date of issuance.