

# Safeguarding Tomorrow Through Ongoing Risk Mitigation Revolving Loan Fund Program – Notice of Funding Opportunity Changes Summary

The Safeguarding Tomorrow Through Ongoing Risk Mitigation Revolving Loan Fund (Safeguarding Tomorrow RLF) program provides capitalization grants to help entities set up a revolving loan fund. This document details changes in the Notice of Funding Opportunity (NOFO) for fiscal year (FY) 2025.

## Background

The Safeguarding Tomorrow RLF program has published its FY 2025 NOFO. It outlines the requirements for program funding including changes from past versions aiming to clear up the program’s long-term approach. This document highlights the changes made in the FY 2025 NOFO and details how these changes affect applicants and the program.

## Key Changes

The FY 2025 Safeguarding Tomorrow RLF NOFO contains nine key changes. The table below outlines those changes. Each section that follows fully describes each change.

**Table 1: Key Changes in the Safeguarding Tomorrow RLF NOFO for FY 2025**

	Change	NOFO Section
<b>Change 1</b>	Applications for the Safeguarding Tomorrow RLF will be accepted on a rolling basis over FY 2025	D.1. Key Dates and Timelines E.2. Review and Selection Criteria
<b>Change 2</b>	Allocation approach	E.2. Review and Selection Process
<b>Change 3</b>	Expanded cost share eligibility	D.12. Funding Restrictions and Allowable Costs F.2.c. Environmental Planning and Historic Preservation Act



Change		NOFO Section
<b>Change 4</b>	Allowing maintenance as an eligible activity and clarifying the definition of “hazard mitigation”	D.12.b. Entity Loan Fund
<b>Change 5</b>	Added examples of eligible administrative costs and technical assistance activities	D.12.d. Management and Administration Costs
<b>Change 6</b>	Transitioned the application submission from FEMA’s Non-Disaster Grants Management System (ND Grants) to FEMA Grants Outcomes (FEMA GO)	D. Application and Submission Information F. Federal Award Administration Information G. Systems Information
<b>Change 7</b>	Clarified allowable loan recipients for Safeguarding Tomorrow RLFs established by tribal governments	D.10.b. Program-Specific Required Forms
<b>Change 8</b>	Clarified timeline and requirement for annual submission of the Intended Use Plan and Project Proposal List	F.3.b.III. Reporting: Annual Intended Use Plan and Project Proposal List Updates
<b>Change 9</b>	Clarified allowable entity contributions to the entity loan fund	D.12.b. Entity Loan Fund

## Change 1 – Applications Will Be Accepted on a Rolling Basis Over FY 2025

This NOFO opens an availability window for fiscal year 2025. FEMA will accept applications during the entire availability window. Applications will be assessed as they are received until all available funds are used or the application deadline has passed.

Applications must be complete and include all required documentation. Funding availability may affect award amounts. As such, FEMA suggests that applicants submit a complete and thorough application as soon as possible.

### PRIORITY FUNDING FOR TRIBES

FEMA will set aside funding each fiscal year as priority for eligible tribal governments. To receive this funding, eligible tribal applicants must first apply to the “Priority Funding for Tribes Submission Deadlines” stated in the NOFO. Tribes can still submit applications after this deadline or after all priority funds have been awarded. These applications will be reviewed and awarded based on the overall funding available.

## Change 2 – Allocation Approach

This NOFO will apportion funding based on the program’s four statutory priorities. While funding is available, eligible applications will receive at least \$5.1 million in grant funding. Funding above \$5.1 million per applicant will be given based on availability and whether the application clearly addresses the priority criteria listed in the table below.

**Table 2: Priority Criteria**

Priority Criteria	Additional Funding Available
Priority 1: Risk Reduction and Resilience	\$750,000
Priority 2: Partnerships	\$1.2 million
Priority 3: Regional Impacts	\$1.2 million
Priority 4: Major Economic Sectors	\$750,000

In past NOFOs, applications were scored based on how well the application addressed these four priorities. Each priority was scored on a scale from 1 to 4. A score of one meant the priority was barely addressed. A score of four was given for exceptional work.

Under the new funding opportunity, the full amount of extra funding for each priority will be awarded to applications that clearly address the priority funding criteria (formerly a score of 3 or 4). Applications that do not clearly address the priority funding criteria will not receive extra funding for that priority.

The Safeguarding Tomorrow RLF Application Review, Scoring, and Allocation Approach Program Support Material gives more detail on funding priorities, application review, and evaluation. Program Support Materials can be found on the [Safeguarding Tomorrow RLF program resources webpage](https://www.fema.gov/grants/mitigation/learn/storm-rlf/resources), (<https://www.fema.gov/grants/mitigation/learn/storm-rlf/resources>).

### Change 3 – Expanded Cost Share Eligibility

In past NOFOs, Safeguarding Tomorrow RLF loans for cost share have been limited to other FEMA Hazard Mitigation Assistance programs. This NOFO expands the eligible use of Safeguarding Tomorrow RLF loans as the non-federal cost share for mitigation activities under all Stafford Act programs and Flood Mitigation Assistance.

The Safeguarding Tomorrow RLF Environmental and Historic Preservation checklist is not required for loans used as a non-federal cost share for another FEMA grant application.

### Change 4 – Allowing Maintenance Projects as an Eligible Activity and Clarification on the “Hazard Mitigation” Definition

This NOFO states that projects for ongoing and deferred maintenance activities are allowed under the Safeguarding Tomorrow RLF program. It also defines “hazard mitigation” as “any sustained action taken to reduce or eliminate long-term risk to people and property from natural hazards and their effects.”

FEMA considers these clarifications. They are not changes to the overall program approach. As such, they apply to loans from past capitalization grant awards and funds issued under this NOFO.

## Change 5 – Added Examples of Eligible Administrative Costs and Technical Assistance Activities

This NOFO added examples of eligible administrative costs and technical assistance activities. This will help applicants find the best way to use management and administrative funding. These examples describe administrative costs and technical assistance activities that broadly apply to the program. They are not specific to this NOFO.

Administrative costs used for setting up and managing entity loan funds include, but are not limited to the following:

- Completing pre-award activities. This includes setting up the fund and the initial Intended Use Plan.
- Completing grant requirements. Examples include submitting the Intended Use Plan and Project Proposal List each year.
- Managing the review of project proposals and selecting projects for loans.
- Tracking compliance of loan projects with federal requirements, such as Environmental and Historic Preservation review.
- Carrying out loan agreements. This includes disbursing funds, monitoring project completion, processing loan repayments, and managing delinquencies.
- Reporting program progress and fund health to FEMA through required performance monitoring.

Examples of technical assistance activities may include the following:

- Scoping assistance. This includes finding solutions for hazards and determining whether to apply to the program.
- Finding ways to use loans for innovative mitigation projects that other programs normally do not fund.
- Finding and setting up revenue streams for repayment.
- Planning for loan repayment schedules.
- Collecting and analyzing local government financial information.

## Change 6 – New Application Portal

In the past, applicants used FEMA's Non-Disaster Grants system to apply for funding for this program. Under the new funding opportunity, applicants will use the FEMA Grants Outcomes ([FEMA GO](https://go.fema.gov)), (<https://go.fema.gov/login?redirect=%2F>) system. Steps to apply for a Safeguarding Tomorrow RLF grant will be available on the [Safeguarding Tomorrow RLF program resources webpage](https://www.fema.gov/grants/mitigation/learn/storm-rlf/resources), (<https://www.fema.gov/grants/mitigation/learn/storm-rlf/resources>).

## **Change 7 – Clarified Allowable Loan Recipients for Revolving Loan Funds Established by Tribal Governments**

This NOFO defines eligible recipients for loans from federally recognized tribal governments. This helps the NOFO address a wide range of government structures.

Federally recognized tribal governments that receive funding for the Safeguarding Tomorrow RLF program may offer loans to local government entities. Examples include the following:

- A subcomponent or department of the tribal nation.
- A designated “authorized tribal organization.”
- An entity that the tribal nation sets up for this purpose.
- An entity that may fall under the broad definition of “local government.”
- Another entity to which the tribal nation has the legal authority to provide a loan.

## **Change 8 – Clarified Timeline for Annual Intended Use Plan and Project Proposal List Submission**

This NOFO describes the timeline for submitting the Intended Use Plan and Project Proposal List each year. It also simplifies the process if the recipient is applying for another Safeguarding Tomorrow RLF program capitalization grant.

The NOFO states that recipients must submit their Intended Use Plan and Project Proposal List each year. This must be done no later than the end of the federal fiscal year (Sept. 30). For entities that submit an Intended Use Plan and Project Proposal List as part of an application package for a Safeguarding Tomorrow RLF capitalization grant, the materials submitted with the application will meet this requirement for the fiscal year in which they are submitted.

The NOFO also states that the Intended Use Plan must be posted for public review and comment for each submission. In contrast, the Project Proposal List does not require public notice unless the list is included in the entity’s Safeguarding Tomorrow RLF grant application. However, FEMA recommends that the Project Proposal List be provided to the public—even if it is not included in the grant application.

## **Change 9 – Clarified Allowable Entity Contributions to the Entity Loan Fund**

Past NOFOs did not clearly state that non-federal contributions to the entity loan fund outside of the entity match portion of the capitalization grant are allowed. This NOFO explains that these contributions are allowed. FEMA will provide more guidance on legal requirements that will apply to loans sourced solely from non-federal funds.

## Summary of Changes

**Table 3: Notice of Funding Opportunity Comparison and Summary of Key Changes**

Key Change	FY 24 NOFO	FY 2025 NOFO
1	Applications were reviewed and evaluated once the submission deadline passed.	Applications will be reviewed and evaluated on a rolling basis. <ul style="list-style-type: none"> <li>Application Start Date: <i>FY 2025: January 14, 2025</i></li> <li>Priority Funding for Tribes Submission Deadline: <i>FY 2025: July 1, 2025, 5 p.m. ET.</i></li> <li>Final Application Submission Deadline: <i>FY 2025: Sept. 30, 2025, 5 p.m. ET.</i></li> </ul>
2	Applications were eligible for more funding based on how well they addressed the four priority criteria. Applications were scored on a range of 1 to 4. The amount of extra funding was based on their score.	Applications that clearly address a priority criterion will receive the full amount of extra funding for that priority. Applications that do not clearly address a priority criterion will not receive extra funding for that priority.
3	Using the funding as the non-federal cost share was limited to grants offered by other HMA programs.	Safeguarding Tomorrow RLF loans may be used for the non-federal cost share for all Stafford Act mitigation grants and Flood Mitigation Assistance.
4	Maintenance activities were not clearly stated to be eligible to receive funding. "Hazard mitigation" was also not defined.	Ongoing and deferred maintenance is allowed. The NOFO clearly defines "hazard mitigation."
5	The NOFO did not describe eligible administrative costs and technical assistance activities.	The NOFO describes eligible administrative costs and technical assistance activities. It also gives an example of each one.
6	The application was submitted on ND Grants.	The application is submitted on FEMA GO.
7	Eligible loan recipients established by tribal governments were not defined.	Eligible loan recipients and the flexibility offered to federally-recognized tribal governments are clearly defined.
8	The NOFO did not detail the required yearly submission of the Intended Use Plan and Project Proposal List.	The updated Intended Use Plan and Project Proposal List must be submitted each year. This must occur no later than the end of the federal fiscal year, Sept. 30. The submission process is simplified if the recipient is applying for another Safeguarding Tomorrow RLF program capitalization grant.

Key Change	FY 24 NOFO	FY 2025 NOFO
9	The NOFO did not state that non-federal contributions to the loan fund outside of the entity match portion of the capitalization grant are allowed.	Non-federal contributions made from outside of the entity match portion of the capitalization grant are clearly allowed.

## Additional Information

You can learn more on the [Safeguarding Tomorrow RLF program website | FEMA.gov](https://www.fema.gov/grants/mitigation/storm-rlf), (<https://www.fema.gov/grants/mitigation/storm-rlf>). FEMA will update program resources and materials as needed. You can send comments and questions through email to [FEMASTORMRLF@fema.dhs.gov](mailto:FEMASTORMRLF@fema.dhs.gov).