

**NATIONAL EMERGENCY MANAGEMENT ASSOCIATION
EMAC COMMITTEE
POSITION PAPER**

DATE: October 13, 2025

SUBJECT: Adoption of EMAC Guidance by the U.S. Department of Justice (DOJ) for National Special Security Events (NSSEs)

DISCUSSION: When a city is selected to host a National Special Security Event (NSSE) and receives Department of Justice (DOJ) grant funding, the city may not have enough personnel or equipment to fully implement its security plan. One of the main ways to obtain additional support is through the Emergency Management Assistance Compact (EMAC). EMAC is a state-to-state mutual aid system managed by state emergency management agencies on behalf of their governors¹. Because EMAC is initiated and administered at the state level, a city cannot directly request EMAC resources from another state; the city must work through their home state emergency management agency.

The city must establish a subrecipient agreement with the state. The state then requests out-of-state resources through EMAC using **Resource Support Agreements (RSAs)**.

Currently, three reimbursement policies collide:

1. DOJ's *Grants Financial Guide* (Uniform Guidance, 2 C.F.R. Part 200);
2. EMAC reimbursement standards in the **Operations Manual** (R-1/R-2 packets, RSA as controlling document, policy-based travel rates);
3. Event-specific addenda and local travel rules (e.g., the Milwaukee / Cleveland Addendums), which are supplemental documents attached to the grant or subaward that impose host-city terms, additional documentation requirements, and travel-policy requirements on Assisting States beyond what is in the main award or in EMAC policy.

This misalignment produces reimbursement delays, repeated Requests For Information (RFIs), and denials despite states' compliance with EMAC law and EMAC Operations Manual

¹ EMAC Members include the 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, and the Northern Mariana Islands, all are referred to as "States" in EMAC law.

reimbursement guidelines. The use of addenda and local city rules creates further confusion and significant delays.

FEMA resolved an analogous issue by embedding EMAC acceptance into its Public Assistance Program and Policy Guide (PAPPG). PAPPG §6.XI on Mutual Aid confirms that costs incurred under EMAC, supported by standard EMAC documentation, are eligible for reimbursement. FEMA does not perform a reasonable cost analysis of work performed through EMAC, as long as the project follows established EMAC rules and procedures.

A comparable policy within DOJ's grant guidance would ensure states remain willing to support NSSEs through EMAC in the future, shorten reimbursement timeframes, and reduce the risk of resource shortfalls. Without these changes, Resource Providers may decline to respond to future DOJ grant funded NSSEs, limiting the availability of trained personnel and equipment.

RECOMMENDATIONS:

NEMA recommends that the U.S. Department of Justice amend its *Grants Financial Guide* to recognize the **Emergency Management Assistance Compact (EMAC)** as the governing framework for reimbursing interstate resources supporting NSSEs when subrecipients are using EMAC.

Specifically, DOJ should:

- Retain its existing award **timelines** for obligation, liquidation, and closeout; and
- Accept **EMAC reimbursement standards** as outlined in the EMAC Operations Manual — including the executed Resource Support Agreement (RSA), R-1/R-2 documentation package, and the assisting entity's written travel and overtime policies — as sufficient for allowability, allocability, and reasonableness under 2 C.F.R. Part 200.

Moved:

DISPOSITION:

Second:

Authenticated: _____

NEMA Secretary