

**United States Department of State  
Office of International Religious Freedom (IRF)  
Notice of Funding Opportunity (NOFO)**

<b>Funding Opportunity Title</b>	IRF FY25 Nigeria Strengthening Capacity of the Legal Community
<b>Funding Opportunity Number</b>	DFOP0018450
<b>Type of Solicitation</b>	Open Competition
<b>Application Deadline</b>	11:59 PM ET on <b>Thursday, July 9, 2026</b>
<b>Assistance Listing Number</b>	19.345
<b>Length of Program</b>	24-48 months
<b>Number of Awards Anticipated</b>	1
<b>Type of Award</b>	Grant or Cooperative Agreement
<b>Award Amount(s)</b>	\$3,500,000
<b>Total Funding Available (Pending Availability of Funds)</b>	\$3,500,000
<b>Anticipated Program Start Date</b>	4 months

**This notice is subject to availability of funding.** The authority for this funding opportunity is found in the Foreign Assistance Act of 1961, as amended (FAA).

#### **A. EXECUTIVE SUMMARY**

The Office of International Religious Freedom (IRF) announces an open competition for organizations interested in submitting applications for projects that improve documentation and reporting efforts on religious freedom abuses in Nigeria, for the purposes of accountability, advocacy, and memorialization. (see Section C for a fuller description of the desired program).

Proposed programming must be responsive to restrictions on religious freedom and must be in line with the U.S. Government's foreign policy goals. Applicants are encouraged to review the International Religious Freedom Act for additional information, which can be found at the following links:

- [International Religious Freedom Act of 1998](#)
- [Frank R. Wolf International Religious Freedom Act \(2016 amendment\)](#)

Applicants will be responsible for ensuring program activities and products are implemented in accordance with the Establishment Clause of the United States Constitution.

#### **B. ELIGIBILITY INFORMATION**

##### ***B.1 Eligible Applicants***

The following organizations are eligible to apply:

- Foreign-based non-profit organizations/nongovernment organizations (NGO)
- U.S.-based non-profit organizations/NGOs with or without 501(c)(3) status

- Public International Organizations
- Private, public, or state institutions of higher education
- For-profit organizations or businesses

IRF's preference is to work with **non-profit entities**; however, there may be some occasions when a for-profit entity is best suited. Applications from for-profit entities may be subject to additional review following the panel selection process. The Department of State does not allow for-profit or commercial organizations to make a profit from its assistance awards. Profit is defined as any amount more than allowable direct and indirect costs. The allowability of costs incurred by commercial organizations is determined by the Federal Acquisition Regulation (FAR) at 48 CFR 30, Cost Accounting Standards Administration, and 48 CFR 31 Contract Cost Principles and Procedures.

### ***B.2 Cost Sharing or Matching***

Providing cost sharing, matching, or cost participation is not required for this NOFO and will not improve competitive ranking of an application. According to 2 CFR 200.306, any budget items proposed for cost share must be allowable per 2 CFR 200, Subpart E—Cost Principles.

### ***B.3 Other Eligibility Requirements***

All organizations must have a Unique Entity Identifier (UEI) issued via SAM.gov as well as a valid registration in SAM.gov. Please see **Section E.3** for more information. Individuals are not required to have a UEI or be registered in SAM.gov.

Primary applicants can submit **one application** in response to the NOFO. If more than one application is submitted by a primary applicant, only the first application submitted and time-stamped by Grants.gov or MyGrants will be reviewed for eligibility.

## **C. PROGRAM DESCRIPTION**

### ***C.1 Goals and Objectives***

The Office of International Religious Freedom (IRF) announces an open competition for organizations interested in submitting applications for projects that support Nigeria's legal community to defend religious freedom and constructively engage state actors on cases involving religious freedom violations, including violations of mutually reinforcing rights, such as the freedoms of association, assembly, expression, and movement.

On October 31, 2025, President Trump designated Nigeria as a Country of Particular Concern (CPC) under the IRF Act, determining that Nigeria has "engaged in or tolerated particularly severe violations of religious freedom." This solicitation is a part of the overall U.S. Government effort to improve the religious freedom for Christians, Muslims, and other affected religious communities in Nigeria.

The constitution of Nigeria enshrines the right to freedom of thought, conscience, and religion, prohibits religious discrimination, and bars federal and state governments from adopting a state religion. While the constitution provides for states to establish courts based on sharia or customary (traditional) law in addition to common law civil courts, it also establishes that civil courts have preeminence over all other courts. Nigeria's constitution and law also provide for freedom of expression. Despite all of these constitutional provisions and Nigeria's status as a ratifying party to the International Covenant on Civil and Political Rights, some state authorities, including secular and religious judges and security agencies, enforce laws and religious norms that restrict the free expression of religious beliefs and other forms of expression connected to full enjoyment of the right to religious freedom.

Societal attitudes regarding the enforcement of laws and religious norms restricting religious freedom or freedom of expression prevent many individuals from openly professing beliefs that are contrary to societal norms for fear of retribution. Compounding this problem further, international human rights organizations report ongoing intimidation and threats against lawyers representing or that consider representing individuals formally accused of committing crimes involving expression of beliefs that challenge, criticize, satirize, or ridicule other religious beliefs or practices. Societal stigma that, at times, triggers mob violence, a perception of judicial impasse, and heavy-handed responses from security or judicial actors to members of marginalized or minority religious or belief groups are barriers deterring young lawyers or law students from making efforts to engage on cases of religious freedom or interconnected rights violations. As a result, the legal community's ability and willingness to fully defend religious freedom cases in Nigeria remains limited and usually concentrated among an ageing generation of human rights lawyers.

A lack of understanding about international human rights law, including religious freedom, and obligations to uphold it in line with Nigeria's constitution, may also contribute to reticence among state officials, and even legal actors, to address threats against religious freedom and free expression. Moreover, navigating Nigeria's hybrid legal system against a backdrop of societal pressure related to religious values remains a challenge for both Nigeria's legal community and state officials, with scarce opportunities for communication or collaboration between these groups to improve efforts to uphold human rights obligations outlined in the constitution and law. Combined, all of these factors have the potential to reinforce a repressive environment for human rights defenders and stymie access to justice.

IRF's goal is to ensure that all individuals can freely and safely exercise their rights to religious freedom and mutually reinforcing rights in Nigeria. IRF seeks to achieve this goal by improving access to justice, particularly for members of Christian and other religious groups facing repression or persecution. The program should seek to ensure that members of the legal community (including but not limited to law students, faculty, experts, lawyers, and advocates) can better defend religious freedom cases and engage state authorities about religious freedom concerns without further exacerbating societal intolerance. The program should achieve impact beyond the life of the project.

Program outcomes may include but are not limited to:

- Civil society and legal actors pursue strategic litigation to improve policy, law, and jurisprudence to protect religious freedom.
- Legal mechanisms adjudicate religious freedom violations fairly for all communities.
- Religious freedom advocates, legal defenders, and government actors increase the public demands to meet international law and standards on religious freedom.

Competitive applicants will demonstrate experience navigating provision of technical assistance to lawyers or other legal advocates working in country settings with hybrid legal systems that blend or permit co-existence of sharia or customary (traditional) law and common law civil courts in the Sub-Saharan Africa region. Additionally, competitive applicants will demonstrate a deep understanding of security limitations and opportunities for risk mitigation related to legal interventions on culturally sensitive topics.

All programs should aim to have **impact that leads to reforms** and the **potential for sustainability** beyond IRF resources. Applicants should have, or be able to develop, active partnerships with thematic or local partners, entities, and relevant partners, including private sector partners and NGOs. Applicants should also have **proven experience** in managing successful and preferably similar projects. Applicants may **form consortia** to combine different expertise into one comprehensive proposal. However, only one organization can be designated as the prime applicant, while the remaining organizations must be designated as partners or sub-awardees. The prime applicant must meet the eligibility criteria listed above. IRF may ask for more background information from applicants without previous federal grant experience, and these applicants might receive limited funding on a trial basis.

IRF is committed to an **anti-discrimination** policy in all its programs and activities. IRF looks for applications that show the recipient does not discriminate against any beneficiaries when implementing a potential award. This means not withholding, negatively affecting, or denying access to the benefits of the award based on any factor not stated in the award. **The recipient should insert this provision, including this paragraph, in all solicitations for sub-grants and contractual agreements under a potential award.**

**Certification Regarding Compliance with Applicable Federal Anti-Discrimination Laws:**

If the place of performance or delivery of any award made under this NOFO will be **within the United States**, applicants are advised that they will be required to certify the following at the time of award:

1. Its compliance in all respects with all applicable Federal anti-discrimination laws is material to the government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code and;
2. It does not operate any programs promoting Diversity, Equity, and Inclusion that violate any applicable Federal anti-discrimination laws. A program promoting Diversity, Equity, and Inclusion means a program whose purpose is to promote preferences based on race, color religion, sex, or national origins, such as in training or hiring.

Activities that are **not** typically allowed include, but are not limited to:

- Activities that repeat or significantly overlap with existing activities without providing a clear, additional benefit to program beneficiaries

- Provision of humanitarian aid
- English language instruction
- Development of advanced computer or communications software and/or hardware
- Purely academic exchanges or fellowships
- External exchanges or fellowships lasting longer than six months
- Activities conducted outside the target country that are not clearly connected to local initiatives and impact, or are not necessary due to security concerns
- Theoretical studies of human rights or democracy issues, including programs focused mainly on research and evaluation without training or capacity-building for local civil society
- Micro-loans or similar small business development initiatives

### ***C.2 Substantial Involvement***

IRF plans to award either a grant or cooperative agreement based on the program's needs and risks. The Grants Officer will make a final determination on the type of award. The main difference between grants and cooperative agreements is the level of "substantial involvement" by the federal government. Cooperative agreements require more Federal government participation. If a cooperative agreement is awarded, IRF will be significantly involved as needed. Examples of this involvement include, but are not limited to:

- Actively participating or collaborating with the recipient in carrying out the award
- Reviewing one stage of work before the next can begin
- Reviewing key provisions of proposed sub-awards or contracts beyond existing Federal policy
- Reviewing a recipient's work plan before the award is final

## **D. APPLICATION CONTENTS AND FORMAT**

Please follow all instructions below carefully. **Proposals that do not meet the requirements of this announcement or fail to comply with the stated requirements will be ineligible.**

### ***D.1 Content and Form of Application Submission***

Please ensure:

- The proposal clearly addresses the goals and objectives of this funding opportunity
- All documents are in English
- All budgets are in U.S. Dollars
- All pages are numbered
- All documents are formatted to 8 ½ x 11 paper
- All documents are single-spaced, 12-point Calibri or Times New Roman font, with 1-inch margins. Captions and footnotes may be 10-point Calibri or Times New Roman font. Font sizes in charts and tables, including the budget, can be reformatted to fit within one page width.

## ***D.2 Application Requirements***

The following documents are **required**:

- 1) **Mandatory Application Forms:** Completed and signed SF-424, SF-424A, and SF-424B forms. **Please see SF-424 instructions in Section 2B of the PSI.**
  
- 2) **Proposal:** The proposal should contain sufficient information that anyone not familiar with it would understand exactly what the applicant wants to do. Applicants may use their own proposal format, but **it must include all the items below**.
  - **Cover Page** (no more than page, preferably as a Word Document) that includes a table with the following information:
    - Organization name of the prime applicant
    - Program title
    - Target country/countries
    - Program synopsis
    - Name and contact information for the main point of contact

**Please see *Cover Page Section 2C of the PSI* for a template and more details.**
  
  - **Executive Summary** (no more than one page, preferably as a Word Document) that outlines program goals, objectives, and activities. The Executive Summary should include a brief section that explicitly states:
    - The problem the program addresses
    - Research-based evidence that supports the unique approach of the program
    - Measurable program outcomes and impacts
  
  - **Table of Contents** (no more than one page, preferably as a Word Document) listing all documents and attachments with page numbers.
  
  - **Proposal Narrative** (no more than ten pages, preferably as a Word Document). The ten-page limit **does not include** the Cover Page, Executive Summary, Table of Contents, Attachments, Detailed Budget, Budget Narrative, Audit, or NICRA. Applicants are encouraged to combine multiple documents into a single Word Document or PDF (i.e., Cover Page, Table of Contents, Executive Summary, and Proposal Narrative in one file). Please see ***Proposal Narrative Guidelines in Section 2F of the PSI*** for more details.
  
- 3) **Budget** (preferably as an Excel workbook) that includes three columns: the request to IRF, any cost sharing contribution, and the total budget. Include a summary budget using the OMB-approved budget categories (see SF-424A as a sample) in a separate tab. Costs must be in U.S. Dollars. Detailed line-item budgets for sub-grantees should be included as additional tabs within the Excel workbook (if available at the time of submission).

Please see ***Budget Guidelines Section 2G of the PSI*** for more information.

- 4) **Budget Narrative** (preferably as a Word Document) that provides detailed explanations and justifications for each line item in the detailed budget spreadsheet, as well as the source and a

description of all cost-share offered. Please see [Budget Guidelines Section 2G of the PSI](#) for more information.

- 5) **Logic Model** (preferably as a Word Document). Please see [Logic Model Section 2I of the PSI](#) for more information.
- 6) **Monitoring, Evaluation, and Learning Narrative** (no more than four pages, preferably as a Word Document). Please see [Monitoring, Evaluation, and Learning Narrative Section 2J of the PSI](#) for more information.
  - IRF strongly encourages applicants to ensure their monitoring, evaluation, and learning systems use human rights-based approaches and include the participation of sub-grantees and participants. In the Monitoring, Evaluation, and Learning Narrative, applicants should demonstrate that evaluation design, data collection, analysis, reporting and learning will be done ethically and responsibly with all program participants (e.g., direct beneficiaries, sub-grantees). Applicants should also protect the privacy of individuals when collecting data. For example, when collecting data from program participants, consider whether your organization has the necessary informed consent forms, confidentiality agreements, and data security protocols.
- 7) **Monitoring, Evaluation, and Learning Plan** (preferably as an Excel workbook). Please see [Monitoring and Evaluation Plan Section 2J of the PSI](#) for more information.
- 8) **Risk Analysis** (preferably as a Word Document). Please see [Risk Analysis Section 2K of the PSI](#) for more information on this requirement, including Do No Harm principles and Preventing Sexual Exploitation and Abuse (PSEA) policies/plans.
- 9) **Key Personnel** (no more than two pages, preferably as a Word Document). Please include short biographies that highlight relevant professional experience. Given the limited space, CVs are not recommended. Per 2 CFR 200.701.1, Key Personnel is defined as: those individuals identified for approval as part of substantial involvement in a cooperative agreement whose positions are essential to the successful implementation of an award. Applicants should keep in mind that any changes to key personnel during the life of the award must be approved of by the Grants Officer.
- 10) **Timeline** (no more than one page, preferably as a Word Document or Excel Sheet). The timeline of the overall program should include activities, evaluation efforts, and closeout.
- 11) **Security Plan** that addresses any issues related to in-person events and recruitment for these events, as well as safety for any online programs or communications. This includes independent IT security audits (with a vulnerability assessment) of any proposed web application or platform. The Security Plan should show that the applicant has considered the risks identified in the Risk Analysis. Costs can also be included in the budget and budget narrative. Applicants are also encouraged to include contingency plans for in-person or online activities.

### ***D.3 Additional Application Documents***

Strong applications will also include:

- Individual Letters of Support and/or Memorandum of Understanding. These must be specific to the program implementation (e.g., from proposed partners or sub-award recipients) and will not count towards the page limit.

IRF can ask for additional documents not mentioned in this NOFO. To ensure fair evaluation, the IRF review panel will only review up to the page limit for each section.

## **E. SUBMISSION REQUIREMENTS AND DEADLINES**

### ***E.1 Address to Request Application Package***

Application forms required above are available at [www.grants.gov](http://www.grants.gov) and MyGrants (<https://mygrants.servicenowservices.com>) under the announcement title “***IRF FY25 Nigeria Strengthening Capacity of the Legal Community***,” funding opportunity number “***DFOP0018351***.” If reasonable accommodation is needed for persons with disabilities or for security reasons, please contact the IRF point of contact listed below. Note that reasonable accommodations do not include deadline extensions.

### ***E.2 Contact Information***

For **technical submission questions** related to this NOFO, please contact [IRFGrants@state.gov](mailto:IRFGrants@state.gov).

For assistance with **MyGrants** accounts and technical issues related to the system, please contact the ILMS help desk by phone at +1 (888) 313-4567 (toll charges apply for international callers) or through the Self Service online portal that can be accessed from <https://afsitsm.servicenowservices.com/ilms>. Customer support is available 24/7.

For assistance with **Grants.gov** accounts and technical issues related to using the system, please call the Contact Center at +1 (800) 518-4726 or email [support@grants.gov](mailto:support@grants.gov). The Contact Center is available 24 hours a day, seven days a week, except federal holidays.

### ***E.3 Unique Entity Identifier (UEI) and System for Award Management (SAM.gov)***

All prime applicants, whether based in the United States or another country, must have a UEI and an active registration with the SAM.gov. A UEI is required by Public Law 109-282, the Federal Funding Accountability and Transparency Act (FFATA), for all Federal awards. An applicant must maintain an active registration while it has a proposal under review by the Department and must continue to keep the registration active for the entire duration of the period of performance of any Federal award that results from this NOFO.

The 2 CFR 200 requires that subrecipients obtain a UEI number. UEI numbers for subrecipients are not required at the time of application but will be required before an award is processed and/or directed to a subrecipient.

***The process of obtaining or renewing a SAM.gov registration may take anywhere from four to eight weeks. Please begin your registration as early as possible.***

- Organizations **based in the United States** or that pay employees within the United States will need an Employer Identification Number (EIN) from the Internal Revenue Service (IRS) and a UEI number prior to registering in SAM.gov.
- Organizations **based outside of the United States** and that do not pay employees within the United States do not need an EIN from the IRS but do need a UEI number prior to registering in SAM.gov.
- **Organizations based outside of the United States that do not intend to apply for U.S. Department of Defense (DoD) awards are no longer required to have a NATO CAGE (NCAGE) code to apply for non-DoD foreign assistance.** If an applicant organization is mid-registration and wishes to remove an NCAGE code from their SAM.gov registration, the applicant should submit a help desk ticket (“incident”) with the Federal Service Desk (FSD) online at [www.fsd.gov](http://www.fsd.gov) using the following language: “I do not intend to seek financial assistance from the Department of Defense. I do not wish to obtain an NCAGE code. I understand that I will need to submit my registration after this incident is resolved in order to have my registration activated.”

**Organizations based outside of the United States that DO NOT plan to do business with the DoD should follow the below instructions:**

Step 1: Proceed to SAM.gov to obtain a UEI and complete the SAM.gov registration process. SAM.gov registration must be renewed annually.

**Organizations based outside of the United States that DO plan to do business with the DoD should follow the below instructions:**

Step 1: Apply for an NCAGE code by following the instructions on the NSPA NATO website linked below:

NCAGE Homepage: <https://eportal.nspa.nato.int/AC135Public/sc/CageList.aspx>

NCAGE Code Request Tool (NCRT): [NCAGE Code Request Tool \(nato.int\)](#)

For NCAGE help from within the United States, call +1 (888) 227-2423.

For NCAGE help from outside the United States, call +1 (269) 961-7766.

Or, email [NCAGE@dlis.dla.mil](mailto:NCAGE@dlis.dla.mil) for any problems in applying for an NCAGE code.

Step 2: After receiving an NCAGE code, proceed to SAM.gov to obtain a UEI and complete the SAM.gov registration process. SAM.gov registration must be renewed annually.

***Information to help with international registrations is included on the SAM.gov website. Go to SAM.gov, click “HELP,” then scroll down to “New to SAM.gov?” for general information.***

***Guidance on SAM.gov and the guidance on GSA's website about requirement for registering in SAM.gov may change, so applicants should check the website for the latest information.***

### **Exemptions**

An exemption from the UEI and SAM.gov registration requirements may be permitted on a case-by-case basis. See [2 CFR 25.110](#) for a full list of exemptions.

Organizations requesting exemption from UEI or SAM.gov requirements must email the point of contact listed in the NOFO **at least two weeks prior to the deadline in the NOFO** providing a justification of their request. Approval for a SAM.gov exemption must come from the warranted Grants Officer before the application can be deemed eligible for review.

### ***E.4 Submission Dates and Times***

**Applications are due no later than 11:59 PM Eastern Time (ET) on Thursday, July 9, 2026.**

### ***E.5 Funding Restrictions***

Any applicant listed on the Excluded Parties List System in the [System for Award Management \(SAM.gov\)](#) ([www.sam.gov](http://www.sam.gov)) or who has a current debt to the U.S. government is not eligible to apply for an assistance award, according to OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 and 12689, "Debarment and Suspension." Additionally, no entity or person listed on the Excluded Parties List System in SAM.gov can take part in any activities under an award. All applicants are strongly encouraged to review the Excluded Parties List System in SAM.gov to make sure no ineligible entity or person is included in their application.

IRF will not consider applications that provide support for any member, affiliate, or representative of a designated terrorist organization. For more information, refer to the list of Foreign Terrorist Organizations: <https://www.state.gov/foreign-terrorist-organizations/> Program activities that directly benefit foreign militaries or paramilitary groups or individuals will not be considered for IRF funding due to funding restrictions.

According to Department of State policy on terrorism, applicants are advised that successful passing of a vetting process to evaluate the risk that funds may benefit terrorists or their supporters is a condition for receiving an award. If selected for an award, applicants will need to provide information required by DS Form 4184, Risk Analysis Information about their company and its principal personnel. Vetting information is also required for all sub-award performance on assistance awards identified by the Department of State as having a risk of terrorist financing. Vetting information may also be requested for program beneficiaries and participants. Failure to provide the requested information or to pass the vetting process may result in the proposal being rejected.

The Leahy Law prohibits Department of State foreign assistance funds from supporting foreign security force units if the Secretary of State has credible information that the unit has committed a gross violation of human rights. Per [22 USC §2378d\(a\) \(2017\)](#), "No assistance shall be furnished under this chapter [FOREIGN ASSISTANCE] or the Arms Export Control Act [22

USC 2751 et seq.] to any unit of the security forces of a foreign country if the Secretary of State has credible information that such unit has committed a gross violation of human rights.” Restrictions may apply to any proposed assistance to police or other law enforcement. Among these, pursuant to section 620M of the Foreign Assistance Act of 1961, as amended (FAA), no assistance provided through this funding opportunity may be furnished to any unit of the security forces of a foreign country when there is credible information that such unit has committed a gross violation of human rights. In accordance with the requirements of section 620M of the FAA, also known as the Leahy Law, program beneficiaries or participants from a foreign government’s security forces may need to be vetted by the Department before the provision of any assistance. If a proposed grant or cooperative agreement will provide assistance to foreign security forces or personnel, compliance with the Leahy Law is required.

U.S. foreign assistance for Burma or Burmese beneficiaries is subject to restrictions. This includes restrictions, pursuant to section 7043(a)(3) of the Department of State, Foreign Operations, and Related Programs Appropriations Act, 2024 (SFOAA) (Div. F, P.L. 118-47), as carried forward by the Full-Year Continuing Appropriations Act, 2025 (Div. A, P.L. 119-4), on funds appropriated under title III of the act for assistance for Burma. Section 7043(a)(3) provides that “none of the funds appropriated by this Act that are made available for assistance for Burma may be made available to the State Administration Council or any organization or entity controlled by, or an affiliate of, the armed forces of Burma, or to any individual or organization that has committed a gross violation of human rights or advocates violence against ethnic or religious groups or individuals in Burma, as determined by the Secretary of State.” In addition, funds cannot be made available to any individual or organization that has committed serious human rights abuse.

United Nations Relief and Works Agency (UNRWA): None of the funds awarded resulting from this Notice of Funding Opportunity may be made available for subawards, direct financial support, or otherwise used to provide any payment or transfer to UNRWA.

Certification Regarding Compliance with 20 U.S.C. 1011f and any other applicable foreign funding disclosure requirements: Applicants are advised that IHEs must certify the following at the time of award, and that this certification requirement must be included in any subaward agreements to IHEs:

- Its compliance in all respects with section 1011f of title 20, United States Code, and any other applicable foreign funding disclosure requirements is material for purposes of section 3729 of title 31, United States Code, and for receipt of appropriate Federal grant funds.

Certification of Trafficking in Persons Compliance and Compliance Plan: Applicants are advised that they will be required to certify the following at the time of award for awards where the estimated value of services to be performed outside the United States exceeds \$500,000:

- To the best of the Recipient’s knowledge, neither the Recipient, nor any subrecipient, contractor, or subcontractor of the Recipient or any agent of the recipient or of such a subrecipient, contractor, or subcontractor, is engaged in any of the activities described in 2 CFR 175.105(a).

- The recipient has implemented a Trafficking in Persons compliance plan to prevent activities described in 2 CFR 175(a) and is compliant with this plan; and the compliance plan must follow the minimum requirements described in 2 CFR 175(b)(5).
- That the Recipient has and will implement procedures to prevent activities described in 2 CFR 175.105(a) and to monitor, detect, and terminate any subrecipient, contractor, subcontractor, or employee of the recipient engaging in these activities.

Recipients do not need to submit a copy of the plan. However, they must provide it to the Grants Officer upon request, and as appropriate, must post the useful and relevant contents of the plan or related materials on their website and at the workplace. Recipients must re-certify on an annual basis for the entire award period of performance.

Promoting Human Flourishing in Foreign Assistance (PHFFA): Applicants for foreign assistance awards should be aware of requirements in 2 CFR Part 602, 603, and 604. These policies are referred to collectively as the Promoting Human Flourishing in Foreign Assistance (PHFFA) Policy.

602: The award term imposes certain abortion-related requirements on foreign nongovernmental organizations (NGOs), United States NGOs, public international organizations, foreign governments, and parastatals.

603: The award term imposes certain requirements relating to gender ideology on foreign nongovernmental organizations (NGOs), United States NGOs, international organizations, foreign governments, and parastatals.

604: The award term imposes certain requirements relating to discriminatory equity ideology on foreign nongovernmental organizations (NGOs), United States NGOs, international organizations, foreign governments, and parastatals.

The Department recognizes there are costs associated with these policies. Potential one-time and recurring costs the Department identifies for recipients and grantees are for familiarization with the policy, development and delivery of organizational training and implementation guidance, routine compliance monitoring, and recordkeeping and reporting requirements.

Organizations should be aware of these restrictions when developing proposals, as they will need to conduct proper due diligence on program beneficiaries and work with IRF to ensure compliance. Due diligence vetting will apply to any individuals or entities receiving foreign assistance funding or support and will include a review of publicly available information.

### ***E.6 Other Submission Requirements***

Unless otherwise specified, all application submissions must be made electronically via [www.grants.gov](http://www.grants.gov) or MyGrants (<https://mygrants.servicenowservices.com>). IRF is not responsible for disqualification due to applicants not being registered before the due date, system errors in MyGrants or Grants.gov, or other errors in the application process. Applicants must save a

screenshot of the checklist showing all documents submitted in case any document fails to upload successfully.

IRF encourages organizations to **submit applications during normal business hours** (Monday – Friday, 9:00 AM-5:00 PM ET). If an applicant experiences technical difficulties and has contacted the appropriate help desk but is not receiving timely assistance (e.g., no response within 48 hours), they may contact the IRF point of contact listed in the NOFO in Section E.2. The point of contact may assist in contacting the appropriate help desk.

### **MyGrants Applications:**

Applicants using MyGrants for the first time should complete the “New Organization Registration.” To register with MyGrants, go to <https://MyGrants.servicenowservices.com> and click “Create an Account” under “New User.” Select “Create a SAMS/MyGrants Applicant/Grantee Account” and complete all required fields.

MyGrants will send an email to verify the account, followed by an “Okta Account” set-up, which may require the use of smartphone for multi-factor authentication (MFA). If an applicant does not have accessibility to a smartphone during the time of creating an account, please contact the ILMS help desk and request instructions on MFA for Windows PC.

### **Grants.gov Applications:**

Applicants who do not submit applications via MyGrants may submit via [www.grants.gov](http://www.grants.gov). Completing all the necessary registration steps for obtaining a username and password from Grants.gov **can take ten business days or longer.**

Please refer to the Grants.gov website for definitions of various "application statuses" and the difference between a submission receipt and a submission validation. Applicants will receive a validation e-mail from Grants.gov upon the successful submission of an application. Validation of an electronic submission via Grants.gov can take up to two business days.

## **F. APPLICATION REVIEW INFORMATION**

### ***F.1 Review Criteria***

Each application will be evaluated and rated based on the evaluation criteria outlined below. **Do not structure your application according to these sub-sections.**

#### Quality of Program Idea

Applications should align with the program framework and policy objectives in the NOFO; be suitable for the country/region; and show originality, substance, precision, and relevance to IRF’s mission of promoting religious freedom. Programs should aim for immediate impact leading to long-term, sustainable reforms. IRF prefers new approaches that do not duplicate efforts but will consider programs that improve or expand existing successful programs in a new way. In countries where similar activities are already happening, applicants must explain how

new activities will not duplicate or simply add to existing ones and how these efforts will be coordinated. Proposals that offer creative solutions to ongoing challenges are encouraged.

#### Program Planning/Ability to Achieve Objectives

Strong applications will show how the proposed activities contribute to the overall objectives, with each activity well-developed and detailed. Include a comprehensive monthly work plan demonstrating the organization's capacity. Objectives should be ambitious yet measurable, results-focused, and achievable within a reasonable timeframe. An applicant's Logic Model must show how activities will impact proposed objectives, matching the objectives, outcomes, key activities, and outputs described in the Proposal Narrative. Applicants are expected to address how the program will engage relevant partners and should identify local partners if appropriate.

If local partners are identified, submit letters of support from them and describe the division of labor among the applicant and local partners. Identify geographic locations for activities, target participant groups or selection criteria for participants, and roles of sub-awardees if applicable.

IRF recognizes that all programs have some level of risk due to internal/external variables that have the potential to adversely affect a program. Risk management should address how the program design incorporates the identification, assessment, and management of key risk factors. IRF will review the Risk Analysis based on the organization's ability to identify risks that could impact the program, as well as how the organization will manage these risks.

#### Institution's Record and Capacity

IRF will consider the past performance of prior recipients and the demonstrated potential of new applicants. Applications should show a record of successful religious freedom and/or human rights programs, responsible fiscal management, and compliance with reporting requirements and federal procurement regulations. Proposed personnel and resources should be appropriate to achieve the project's objectives. Programs should have potential for continued funding beyond IRF resources.

#### Rights Based Approach

IRF aims to advance the rights of all persons and requests program approaches dedicated to strengthening rights-respecting societies as a necessary pillar of strong democracies. Discrimination and violence targeting any members of society undermines collective security and threatens democracy. The proposal should show how the program will further engagement in persecuted communities and improve the respect for the rights of these individuals at the societal and/or governmental level. This approach should be included in the program concept and design, as well as in implementation of all proposed activities, objectives, and monitoring.

#### Cost Effectiveness

Applications should clearly demonstrate cost-effectiveness, including leveraging institutional and other resources. However, cost-sharing is not required and does not result in preference during the review process. Budgets should have low and reasonable overhead and administration costs, with clear explanations and justifications for these costs in relation to the work involved.

All budget items should be clearly explained to show necessity, appropriateness, and connection to the program objectives.

*If cost share is included in the budget, the recipient must maintain written records to support all allowable costs that are claimed as its contribution to cost share, as well as costs to be paid by the federal government. Such records are subject to audit. In the event the recipient does not meet the minimum amount of cost-sharing as stipulated in the recipient's budget, IRF's contribution may be reduced in proportion to the recipient's contribution.*

If two or more applications receive equivalent scores based on the evaluation criteria outlined in this NOFO, preference will be given to the applicant with the lower indirect cost rate, as consistent with Executive Order 14332, Section 4(b)(iii). This preference will only be applied as a tie-breaking mechanism and does not supersede the primary evaluation criteria.

#### Multiplier Effect/Sustainability

Applications should show how the program will have a multiplier effect and be sustainable beyond the life of an award. A good multiplier effect will have an impact beyond the direct beneficiaries of the grant (e.g., participants trained under a grant go on to train other people; workshop participants use skills from a workshop to enhance a national-level election that affects the entire populace). A strong sustainability plan may include continuing impact beyond the life of the program or securing other donor support after IRF funding ends.

#### Project Monitoring, Evaluation, and Learning

Applications must include a Monitoring, Evaluation, and Learning Narrative explaining how the program's progress will be monitored and evaluated, and who will be responsible for those activities. Applications should demonstrate the capacity to provide measurable outputs and outcomes. The Monitoring, Evaluation, and Learning Narrative should explain how internal or external evaluations will be incorporated into the program timeline, or how the program will be systematically assessed without them. Please see **Section 2J on Monitoring, Evaluation, and Learning Narrative in the Proposal Submission Instructions (PSI)** for more information.

### ***F.2 Review and Selection Process***

The warranted Grants Officer will determine technical eligibility for all applications. A merit review panel will evaluate all eligible applications based on the criteria above.

The IRF merit review panel typically includes representatives from IRF, the appropriate Department of State regional bureau, functional bureau, and if possible, U.S. Embassies. If embassy personnel cannot join the panel, their feedback will be incorporated via regional bureau participants. At the end of the panel's discussion about an application, the review panel votes on whether to recommend the application for approval by the Ambassador at Large for International Religious Freedom or their delegate. If more applications are recommended for approval than IRF can fund, the merit review panel will rank the recommended applications in priority order for consideration by the Ambassador at Large. All panelists must sign non-disclosure agreements and conflicts of interest agreements.

IRF merit review panels may provide conditions and recommendations on applications to enhance the proposed project, which must be addressed by the applicant before further consideration of the award. To ensure effective use of IRF funds, conditions or recommendations may include requests to increase, decrease, clarify, and/or justify costs and project activities.

### ***F.3 Risk Review***

Under the merit review as required by 2 CFR 200.206, prior to making a Federal Award the Department will review and consider the following risk factors:

- Financial stability
- Management systems and standards
- History of performance
- Audit reports and findings
- Ability to effectively implement requirements

Before issuing a federal award with a total federal share over \$350,000, the Department of State must review information about the applicant found in the designated integrity and performance system on SAM.gov (41 USC §2313). Applicants can review and comment on any information about themselves in this system. The Department of State will consider these comments, along with other information in the system, to assess the applicant's integrity, business ethics, and record of performance under federal awards.

## **G. AWARD NOTICES**

The award or cooperative agreement will be written, signed, awarded, and administered by the Grants Officer. The award agreement is the authorizing document, and it will be provided to the recipient for review and countersignature. The recipient may only start incurring project expenses beginning on the start date shown on the award document signed by the Grants Officer.

If a proposal is selected for funding, the Department of State has no obligation to provide any additional future funding. Renewal of an award to increase funding or extend the period of performance is at the discretion of the Department of State.

Issuance of this NOFO does not constitute an award commitment on the part of the U.S. government, nor does it commit the U.S. government to pay for costs incurred in the preparation and submission of proposals. Further, the U.S. government reserves the right to reject any or all proposals received.

IRF will provide a separate notification to applicants on the result of their applications. Successful applicants will receive a letter electronically via email requesting that the applicant respond to review panel conditions and recommendations.

If awarded, payments under this award will be made through PMS or by completing form SF-270, Request for Advance or Reimbursement. Final determination will be made in conjunction

with the Grants Officer. Unless otherwise stipulated, the recipient may request payments on a reimbursement or advance basis.

- Instructions for requesting payments via PMS are available at: <https://pms.psc.gov/>.
- Instructions for requesting payments via SF-270 are available at: <https://apply07.grants.gov/apply/forms/sample/SF270-V1.0.pdf>.

Advance payments must be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements of the recipient in carrying out the purpose of this award. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the recipient for direct program or project costs and the proportionate share of any allowable indirect costs.

Recipients may not draw down funds without the affirmative authorization of the Department of State. In addition, recipients must submit, with each PMS or SF-270 payment request, a detailed explanation justifying the request.

## **H. POST-AWARD REQUIREMENTS AND ADMINISTRATION**

### ***H.1 Administrative and National Policy Requirements***

Before submitting an application, applicants should review all the terms and conditions and required certifications which will apply to this award, to ensure that they will be able to comply. These include the [Guidance for Grants and Agreements in Title 2 of the Code of Federal Regulations](#) (2 CFR), as updated in the Federal Register's 89 FR 30046 on April 22, 2024, and the [U.S. DEPARTMENT OF STATE STANDARD TERMS AND CONDITIONS](#).

#### [2 CFR 25 - UNIVERSAL IDENTIFIER AND SYSTEM FOR AWARD MANAGEMENT](#)

#### [2 CFR 170 - REPORTING SUBAWARD AND EXECUTIVE COMPENSATION INFORMATION](#)

#### [2 CFR 175 - AWARD TERM FOR TRAFFICKING IN PERSONS](#)

#### [2 CFR 182 - GOVERNMENTWIDE REQUIREMENTS FOR DRUG-FREE WORKPLACE \(FINANCIAL ASSISTANCE\)](#)

#### [2 CFR 183 - NEVER CONTRACT WITH THE ENEMY](#)

#### [2 CFR 600 – DEPARTMENT OF STATE REQUIREMENTS](#)

Recipients must comply with all applicable Executive Orders. A searchable list can be found in the Federal Register: <https://www.federalregister.gov/>

Due to the determination made under the **Trafficking Victims Protection Act (TVPA)** for funds obligated during FY 2026, assistance that benefits the governments of the following

countries may be subject to a restriction. The Department of State determines on a case-by-case basis what constitutes assistance to a government; the general principles listed below apply.

Assistance to the government includes:

- All branches of government (executive, legislative, judicial) at all levels (national, regional, local)
- Public schools, universities, hospitals, and state-owned enterprises, as well as government employees
- Cash, training, equipment, services, or other assistance provided directly to the government, assistance provided to an NGO or other implementer for the benefit of the government, and assistance to government employees

**Subject to TVPA for funds obligated during FY 2026:**

**AF:** Eritrea, South Sudan, Sudan

**EAP:** Burma, Cambodia, China (PRC), North Korea

**EUR:** Belarus, Russia

**NEA:** Iran, Syria

**SCA:** Afghanistan

**WHA:** Cuba

Additional requirements may be included depending on the program.

***H.2 Reporting***

Applicants should be aware of the post award reporting requirements reflected in [2 CFR 200 Appendix XII—Award Term and Condition for Recipient Integrity and Performance Matters](#).

Recipients will be required to submit financial reports and program reports. The award document will specify what reports are required and how often these reports must be submitted, typically on a quarterly basis.

The Federal Financial Report (FFR or SF-425) is the required form for **financial reports** and must be submitted in PMS, and a copy of the report submitted in PMS then uploaded to the award file in MyGrants. Program reports uploaded to the award file in MyGrants must include a narrative as described below, as well as Program Indicators (or other mutually agreed upon format approved by the Grants Officer), including standard (F) framework indicators and IRF framework indicators. F and IRF framework indicators will be reviewed and negotiated during the final stages of issuing an award on a program-by-program basis.

**Narrative progress reports** should reflect the focus on measuring the program's progress on the overarching objectives and should be compiled according to the objectives, outcomes, and outputs as outlined in the award's Scope of Work (SOW) and in the Monitoring, Evaluation, and Learning Narrative. An assessment of the overall project's achievements should be included in each progress report. Where relevant, progress reports should include the following sections:

- Relevant contextual information (limited)
- Explanation and evaluation of significant activities of the reporting period and how the activities reflect progress toward achieving objectives, including meeting

benchmarks/targets as set in the approved Monitoring, Evaluation, and Learning Plan. In addition, attach the Monitoring, Evaluation, and Learning Plan, comparing the target and actual numbers for the indicators

- How relevant communities are being included in program activities
- Any qualitative impact or success stories from the project, when possible
- Copy of baseline, mid-term, and/or final evaluation report(s) conducted by an external evaluator; if applicable
- Relevant supporting documentation or products related to the project activities (such as articles, meeting lists and agendas, participant surveys, photos, manuals, etc.) as separate attachments
- Description of how the recipient is pursuing sustainability, including looking for sources of follow-on funding
- Any problems/challenges in implementing the project and a corrective action plan with an updated timeline of activities
- Reasons why established goals were not met
- Data for the required F and/or IRF framework indicator(s) for the quarter as well as aggregate data by fiscal year
- Program Indicators or other mutually agreed upon format approved by the Grants Officer
- Proposed activities for the next quarter
- Additional pertinent information, including analysis and explanation of cost overruns or high unit costs, if applicable

A final narrative and financial report must also be submitted within 120 days after the expiration of the award.

**Foreign Assistance Data Review:** As required by Congress, the Department of State must make progress in its efforts to improve tracking and reporting of foreign assistance data through the Foreign Assistance Data Review (FADR). The FADR requires tracking of foreign assistance activity data from budgeting, planning, and allocation through obligation and disbursement. Successful applicants will be required to report and draw down federal funding based on the appropriate FADR Data Elements, indicated within their award documentation. In cases of more than one FADR Data Element, typically program or sector and/or regions or country, the successful applicant will be required to maintain separate accounting records.

Delays in reporting may result in delays of payment approvals and failure to provide required reports may jeopardize the recipient's' ability to receive future U.S. government funds. IRF reserves the right to request any additional programmatic and/or financial program information during the award period.

### ***H.3 Branding and Marking***

The Department of State, its programs, and U.S. Government funding and assistance should be easily identifiable to the Department's global audiences.

Recipients of federal assistance awards must follow the branding guidance published at [Guidance for Contracts and Grants - U.S. Department of State Brand System](#). Branding policy

exceptions are outlined in the U.S. Department of State Foreign Affairs Manual [10 FAM 416, Policy Exceptions](#). For more information, visit: <https://brand.america.gov>.

Due to the sensitivity of religious freedom programming, DRL/IRF will seek a branding waiver for programs funded through this solicitation.

## **I. OTHER INFORMATION**

Applicants should be aware that IRF understands that some information contained in applications may be considered sensitive or proprietary and will make appropriate efforts to protect such information. However, applicants are advised that IRF cannot guarantee that such information will not be disclosed, including pursuant to the Freedom of Information Act (FOIA) or other similar statutes.

Background information on IRF can be found on <https://www.state.gov/bureaus-offices/under-secretary-for-foreign-assistance-humanitarian-affairs-and-religious-freedom/office-of-international-religious-freedom/>.