



Notice of Funding Opportunity (NOFO)

Countering Iran and its Proxies through Enhanced Counterterrorist Financing in Iraq

Bureau of Counterterrorism, Department of State

Opportunity number: DFOP0018732

Application deadline: **[date]**

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**U.S. Department of State
Bureau of Counterterrorism
Notice of Funding Opportunity**

A. Basic Information

1. Overview

Funding Opportunity Title	Countering Iran and its Proxies through Enhanced Counterterrorist Financing in Iraq
Funding Opportunity Number	DFOP0018670
Announcement Type	New
Deadline for Applications	07/17/2026, 5:00 P.M. (Washington, D.C. time)
Assistance Listing Number	19.701
Length of Performance Period	24 months
Number of Awards Anticipated	1 award
Award Amounts	\$2,910,039
Total Available Funding	\$2,910,039 pending availability of funds
Type of Funding	FY25/26 Nonproliferation, Anti-terrorism, Demining and Related Programs (NADR) funds under the Foreign Assistance Act
Anticipated Program Start Date	September 30, 2026

Funding Instrument Type: Cooperative agreement

Project Performance Period: Proposed project should be completed in 24 months or less.

This notice is subject to availability of funding.

2. Executive Summary

Priority Region: Iraq

Executive Summary

The Department of State's Bureau of Counterterrorism (CT) announces this funding opportunity to strengthen Iraq's anti-money laundering and countering the financing of terrorism (AML/CFT) regime through targeted training and technical assistance. This program should deliver concrete returns for American taxpayers by disrupting the financial networks of Iran, its proxy groups, and other U.S.-designated foreign terrorist organizations (FTOs), which exploit Iraq's financial system to fund destabilizing activities and attacks against U.S. facilities, personnel, and interests in the region.

Making America Safer and More Prosperous

Iran-aligned terrorist militia groups (IAMGs), many of which are FTOs, Specially Designated Global Terrorists (SDGTs), and other terrorist organizations operating in Iraq leverage illicit financial networks to sustain operations, procure weapons, and conduct attacks that directly threaten U.S. personnel, facilities, and businesses in Iraq.

Recent attacks and events illustrate the ongoing threat from IAMGs and designated entities, which have attacked numerous U.S. personnel, facilities and businesses in Iraq, including in the Iraqi Kurdistan Region, since February 28. IAMGs have historically conducted rocket and drone attacks on U.S. diplomatic facilities, military installations, and economic interests. By strengthening Iraq's AML/CFT regime, this program will enhance the Iraqi government's ability to identify, disrupt, and prevent terrorist financing activity and reduce the financial resources available to fund these attacks against the United States.

The recently released U.S. Counterterrorism Strategy emphasizes, "the greatest threat to the United States emanating from the Middle East comes specifically from Iran, directly in the form of its nuclear and missile capabilities, and indirectly in the form of the billions of dollars it funnels to its terror proxies." The Financial Action Task Force (FATF) has identified several deficiencies in Iraq's CFT regime that are exploited by terrorist groups. This program should directly address these vulnerabilities by building Iraq's capabilities to detect, investigate, and prosecute terrorist financing in line with FATF standards.

Fostering Iraqi Self-Reliance and Burden-Shifting

This program should be designed to reduce Iraq's long-term dependency on U.S. taxpayer resources by building sustainable Iraqi civilian law enforcement and financial regulatory capabilities to independently detect and dismantle terrorist financing networks. Consistent with the 2025 National Security Strategy (NSS)'s principle of "burden-sharing and burden-shifting," this program should include a train-the-trainer component to enable Iraqi civilian authorities to establish an Iraqi-owned training capability, reducing long-term U.S. resource commitments.

This approach reflects the Counterterrorism Strategy and NSS's call for countries to "assume primary responsibility for their regions and contribute far more to our collective defense." All activities should emphasize Iraqi ownership, institutional capability, and graduation to self-sufficiency without ongoing U.S. support.

Goals and Objectives:

- U.S. Department of State Agency Strategic Plan Fiscal Years 2026-2030 - Goal 6: Targeted Foreign Assistance that Puts American Interests First
 - Objective 6.1: Leverage assistance as a tool of statecraft.
 - Objective 6.2: Promote and provide trade, not aid.

CT Program Outcome(s):

- Outcome 1: Protect the homeland, Americans, and U.S. interests by denying Iran and its proxies the ability to raise, store, and move funds through Iraq's financial system by assisting Iraq with enacting and implementing laws and regulations in line with international standards set by FATF.
- Outcome 2: Protect the homeland, Americans, and U.S. interests by strengthening Iraq's ability to investigate and prosecute, and disrupt terrorist financing and other illicit

activities through enhanced collaboration among key Iraqi national authorities (including regulators, law enforcement agencies, prosecutors, and financial intelligence units), as well as regional and international bodies.

- Outcome 3: Protect the homeland, Americans, and U.S. interests by strengthening the ability of Iraqi national authorities to collect, analyze, and appropriately and securely share financial intelligence to identify, investigate, and disrupt terrorist financing and other illicit financial activity, including through cooperation with the Egmont Group and the United States Government.
- Outcome 4: Protect the homeland, Americans, and U.S. interests by strengthening Iraqi public and private sector compliance with AML/CFT obligations through improved understanding of terrorist financing and other illicit financial activity and risk and taking appropriate risk-mitigation measures, including increased quality and quantity of suspicious transactions and suspicious activity reporting to national authorities and U.S. aligned international authorities.

- **B. Eligibility**

1. ***Eligible Applicants***

The following types of organizations are eligible to apply:

- Not-for-profit organizations, including think tanks and civil society/non-governmental organizations
- Public and private educational institutions
- For-profit organizations
- Public International Organizations (PIOs) and Governmental institutions

CT invites ALL eligible organizations, as described above, to submit an application/s for a program that disrupts the financial networks of Iran, its proxy groups, and other terrorist organizations through providing training, technical assistance, and train-the-trainer initiatives to Iraq. Please follow all instructions below.

2. ***Cost Sharing or Matching***

Providing cost sharing, matching, or cost participation - while encouraged - is not an eligibility factor or requirement for this NOFO, and providing cost share will not result in a more favorable competitive ranking.

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 at the time of application. Please see Section D.3 for more information.

Applicants are only allowed to submit one proposal per organization. If more than one proposal is submitted from an organization, all proposals from that institution will be considered ineligible for funding.

C. Program Description

1. *CT Program Outcomes*

The U.S. Counterterrorism Strategy emphasizes that the mission of the U.S. Government is to identify and disrupt terrorist attacks before they occur. Protecting American personnel and interests abroad requires Iraq to possess robust capabilities to counter transnational threats within its borders. Iraq must possess the ability to secure its financial systems against exploitation by IAMGs, particularly when porous financial controls enable threats that directly endanger the U.S. facilities and personnel.

Terrorist Financing Threat

IAMGs pose a persistent threat to U.S. personnel, Iraqi sovereignty, and regional stability through their exploitation of Iraq's financial system. IAMGs continue to attack U.S. personnel and facilities in Iraq, including rocket and drone attacks on U.S. diplomatic facilities, military installations, and business interests. These groups maintain sophisticated financial networks that facilitate weapons procurement, operational funding, and personnel support, all of which directly threaten American security.

Iranian Financial Influence

Iran exploits Iraq's financial, investigative, and prosecutorial weaknesses to fund proxy groups and evade international sanctions. Iranian financial networks use Iraqi financial institutions and money service businesses to move funds, procure weapons and materials, and support IAMG operations. Strengthening Iraq's CFT regime directly counters Iranian malign influence and reduces resources available to Iran-backed terrorist groups.

ISIS Financial Networks

ISIS maintains financial networks in Iraq that support its continued operations, which often overlap with other criminal enterprises, creating a nexus of illicit financial activity that threatens regional stability and American interests.

Program Focus

The program should work exclusively with any applicable U.S.-aligned Iraqi financial authority, the GOI Financial Intelligence Unit, law enforcement agencies with financial crimes jurisdiction, customs authorities, judicial authorities, and other relevant national authorities that play a role in financial investigations and prosecutions.

Applicants should propose a comprehensive program to achieve the following counterterrorism outcomes:

Outcome 1: Protect the homeland, Americans, and U.S. interests by denying Iran and its proxies the ability to raise, store, and move funds through Iraq's financial system by assisting Iraq with enacting and implementing laws and regulations in line with international standards set by FATF.

- Iraqi authorities demonstrate measurable progress in enacting and implementing relevant CFT laws and regulations, including criminalization of terrorist financing, asset freezing mechanisms, and international cooperation frameworks, with enhanced regulatory supervision and enforcement capabilities, in line with FATF standards.

Outcome 2: Protect the homeland, Americans, and U.S. interests by strengthening Iraq's ability to investigate and prosecute, and disrupt terrorist financing and other illicit activities through enhanced collaboration among key Iraqi national authorities (including regulators, law enforcement agencies, prosecutors, and financial intelligence units), as well as regional and international bodies.

- Iraqi authorities demonstrate improved and sustainable interagency coordination through functional national CFT coordination mechanisms, enhanced law enforcement capabilities to conduct financial investigations targeting IAMGs and FTO funding networks, improved prosecutorial and judicial capabilities to successfully convict terrorist financing cases, and strengthened cooperation with regional and international bodies.

Outcome 3: Protect the homeland, Americans, and U.S. interests by strengthening the ability of Iraqi national authorities to collect, analyze, and appropriately and securely share financial intelligence to identify, investigate, and disrupt terrorist financing and other illicit financial activity, including through cooperation with the Egmont Group and the United States Government.

- Iraq's financial intelligence unit demonstrates improved ability to collect, analyze, and disseminate high-quality financial intelligence domestically and internationally, including enhanced engagement with the Egmont Group and effective bilateral financial intelligence sharing with the United States.

Outcome 4: Protect the homeland, Americans, and U.S. interests by strengthening Iraqi public and private sector compliance with AML/CFT obligations through improved understanding of identified risks of terrorist financing and other illicit financial activity and risks and taking appropriate risk-mitigation measures, including increased quality and quantity of suspicious transactions and suspicious activity reporting to national authorities and U.S. aligned international authorities.

- Iraqi financial institutions, including banks, money service businesses, exchange houses, and other covered financial institutions, demonstrate improved understanding of terrorist financing risks and implementation of enhanced CFT controls, resulting in significant increases in the quantity and quality of suspicious transaction reports filed with national authorities.

Desired End State

This program should enable Iraq's financial regulatory authorities, law enforcement agencies, and judicial institutions to independently detect, investigate, prosecute, and disrupt terrorist financing networks that threaten U.S. personnel and interests. By the end of the program, Iraq should demonstrate sustainable functional capabilities including financial intelligence operations that identify terrorist financing patterns, effective supervision of financial institutions (including banks, money service businesses, exchange houses, and other covered financial institutions), law enforcement ability to dismantle IAMG and FTO financial networks, prosecutorial and judicial capabilities to convict terrorist financing cases, and effective interagency coordination. The program should prioritize Iraqi ownership, institutionalize best practices, and establish a clear path to full operational self-sufficiency, in line with the Administration's commitment to burden-shifting and sustainable security partnerships.

Sustainability: Applicants should demonstrate how program activities will create lasting institutional abilities beyond the program period, such as through:

- Train-the-trainer models to institutionalize skills transfer
- Integration of training into Iraqi law enforcement curricula
- Maintenance and sustainment plans for potential provided equipment

2. *Substantial Involvement*

This funding opportunity will be awarded as a cooperative agreement, which requires substantial involvement by CT throughout the program lifecycle. Substantial involvement means CT will be actively engaged in program implementation, not merely monitoring from a distance. CT's substantial involvement in this program will include, but is not limited to:

Program Design and Approval

- Review and approval of detailed training curricula, lesson plans, and instructional materials before delivery
- Approval of all equipment lists, specifications, and procurement plans
- Approval of train-the-trainer curriculum and Iraqi instructor selection
- Review of key personnel assigned to the program, including trainers, subject matter experts, and program management staff

Ongoing Program Direction

- Regular participation in program planning meetings and strategic reviews
- Joint decision-making on program modifications, scope changes, or timeline adjustments
- Approval authority over significant programmatic decisions, including changes to training locations, participant selection, or activity sequencing
- Direction on prioritization of program activities based on evolving threat assessments and policy priorities
- Review and approval of implementer international travel funded under this agreement

Coordination with U.S. Mission Iraq (USMI)

- Close coordination with U.S. Embassy Baghdad, including the U.S. Department of the Treasury Financial Attache to Iraq, on program implementation, technical assistance priorities, and Iraqi government engagement
- Joint participation in meetings with Iraqi government counterparts
- Alignment of program activities with broader USMI priorities and bilateral relationship management

Monitoring and Evaluation (M&E)

- Regular site visits to training facilities and operational areas when/where feasible
- Participation in training observations and capability assessments when/where feasible
- Potential independent evaluation of Iraqi institutions performance and capability improvements
- Maintenance of and access to relevant financial, procurement, and programmatic records for monitoring, audit, evaluation, and compliance purposes.
- Review and approval of M&E reports before finalization (e.g., documents noted in Section D.3 of this NOFO, etc.)

Conditionality Monitoring

- Authority to adjust program implementation based on conditionality progress

Information Sharing and Reporting

- Regular briefings to CT and the USMI on program progress and challenges, and impact
- Joint analysis of terrorist financing trends, illicit financial activity, sanctions evasion typologies, IAMG activities, and terrorist threats
- Coordination with the USMI on program activities and bilateral engagement
- Integration of program outcomes into broader U.S. counterterrorism strategies and policy

Applicants must be prepared for regular engagement and collaborative decision-making, adapt quickly to Department guidance, provide full visibility into program activities, allow sufficient time for CT approval on significant activities, and demonstrate experience managing complex, multi-stakeholder programs in high-threat environments. Recipients must also implement appropriate controls to prevent the diversion of award funds, goods, or services to sanctioned individuals or entities, terrorist organizations, or their affiliates and must comply with all applicable U.S. sanctions and counterterrorism authorities.

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.

Content of Application

Please ensure:

- The proposal clearly addresses the goal(s), objective(s), and CT outcome(s) 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 Microsoft Word documents are single-spaced, 12-point Times New Roman font, with a minimum of 1-inch margins.

The following documents are **required**:

1. Mandatory application forms

- SF-424 (Application for Federal Assistance – organizations).
- SF-424A (Budget Information for Non-Construction programs).
- SF-424B (Assurances for Non-Construction programs)

2. Summary Page (optional)

Cover sheet stating the applicant's name and organization, proposal date, program title, program period proposed start and end date, and brief purpose of the program.

3. Proposal (no more than 12 pages, excluding the title page, table of contents, attachments, mandatory application forms)

The proposal should contain sufficient information such 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.

- **Proposal Summary:** Short narrative that outlines the proposed program, including anticipated results and impact that are in alignment with relevant goal, objectives, and CT outcomes noted in the Executive Summary.
- **Introduction to the Organization applying:** A description of past and present operations, showing the ability to carry out the project, including information on relevant previous grants from the State Department and/or U.S. government agencies.
- **Project Methods and Design:** A description of how the program is expected to resolve the stated problem. Program design must include the following:
 1. **Situational Analysis:** Open your proposal with a brief review of the current state or conditions surrounding the program that could affect its design, implementation, or results. This analysis should include an assessment of political/legal, security, economic, infrastructure, institutional, and other relevant conditions or factors to understand and define baseline and context.
 2. **Problem Statement:** Follow the brief situational analysis with a clear, concise, and well-supported statement of the problem to be addressed and why the proposed program is needed. The program's activities articulated under the "Program Activities" section below must demonstrate that they address the problem statement. Draw upon the situational analysis to inform the justification.
 3. **Alignment with U.S. Counterterrorism Strategy and Policy:** A program must prioritize contributions to stated goal(s), objective(s), and CT outcome(s) in the Executive Summary. Applicants must clearly identify and describe how the program will meet these goal(s), objective(s), and outcome(s).
 4. **Project Activities:** Description of proposed activities to produce specific outputs and outcomes.

5. **Logic Model and Theory of Change:**

- *Logic Model:* Articulates how and why the program is expected to contribute to achieving the goal(s), objective(s), and outcome(s) noted in the Executive Summary. The logic model sets a foundation for monitoring and evaluating progress. It must also demonstrate the causal linkages between program inputs, activities, outputs, and stated goal(s), objective(s), and outcome(s).
- *Theory of Change:* A brief statement that ties a logic model together by summarizing why, based on available evidence and consideration of other possible paths, the changes described in the model are expected to occur. It explains why we believe our program activities will result in specific outcomes. These can be written as “If X (activities), then Y (outcomes).”
- CT will provide applicants with a template/guidance for the proposed logic model and theory of change.

6. **Performance Monitoring Plan (PMP):** Applicants must include a preliminary performance monitoring plan (PMP), which is a planning tool for tracking data on program performance. A PMP provides information on data collection against indicators to gauge the direct and near-term effects of activities and whether desired results are occurring as expected during implementation. The plan must consider activities, outputs, and outcomes. The plan must be documented (using CT’s provided template/guidance) and include:

- Illustrative indicators to monitor the progress and measure actual results compared to expected ones.
 - At least three relevant CT Indicators, per the final page of the CT PMP “How-To” guidance/template.
 - Establishment of a baseline, and discussion of how it will be collected.
 - Targets established for each performance indicator.
 - Establishment of the data source, data collection frequency, and individual responsible for each indicator.
 - Note: The PMP’s indicators, activities, and outcomes will be reflected in a Performance Indicator Tracking Table (PITT), a separate table and companion to the PMP that shows quarter-by-quarter and annual (cumulative) results for each indicator. The PITT will be required as part of mandatory quarterly performance reporting for the successful applicant but is not part of the NOFO application.
- **Proposed Project Schedule and Timeline:** The proposed timeline for the program activities. Include the dates, times, and locations of planned activities and events.
 - **Key Personnel:** Names, titles, roles, responsibilities, and experience/qualifications of key personnel involved in the program. State the proportion of their time that will be used to support the project.
 - **Project Partners:** List the names and type of involvement of key partner organizations and sub-awardees.
 - **Future Funding or Sustainability:** Applicant’s plan for continuing the program beyond the grant period, or the availability of other resources, if applicable. Competitive proposals will describe strategies to sustain program outcomes after the period of performance ends.

4. **Budget Justification Narrative**

After filling out the SF-424A Budget (noted above), use a separate file to describe each of the budget expenses in detail. See Section *I. Other Information: Guidelines for Budget Submissions* below for further information.

5. *Attachments*

- CT Logic Model Template and How to Guide
- CT PMP Template and How to Guide
- 1-page Curriculum Vitae (CV) or resume of key personnel proposed for the project.
- Letters of support from project partners describing the roles and responsibilities of each partner.
- If your organization has a Negotiated Indirect Cost Rate Agreement (NICRA) and includes NICRA charges in the budget, your latest NICRA should be included as a PDF file.
- Official permission letters, if required for program activities.
- Risk analysis: Identify the internal and external risks associated with the proposed program, rate the likelihood of the risks, rate the potential impact of the risks on the program, and identify actions that could help mitigate the risks.

E. Submission Requirements and Deadlines

1. *Address to Request Application Package*

Application forms required above are available at grants.gov and MyGrants.

2. *Department of State Contacts*

If you have any questions about the grant application process, please contact CT Grants at CT_Grants@state.gov

Deadline for Receipt of Questions: 06/24/2026, 5:00 p.m. (Washington, D.C., time). Questions and Answers or FAQ will be posted by 07/02/2026 on grants.gov to answer questions from all potential applicants.

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

Required Registrations

All organizations, whether based in the United States or in another country, must have a Unique Entity Identifier (UEI) and an active registration in SAM.gov. A UEI is one of the data elements mandated 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 subrecipients to obtain a UEI number. Please note the UEI for subrecipients is not required at the time of application but will be required before an award is processed and/or directed to a sub-grantee.

Note: The process of obtaining or renewing a SAM.gov registration may take anywhere from 4-8 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 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 prior to registering in SAM.gov.

- **Organizations based outside of the United States that do not intend to apply for U.S. Department of War (DoW) awards are no longer required to have a NATO Commercial and Government Entity (NCAGE) code to apply for non-DoD foreign assistance funding opportunities.** 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 using the following language: “I do not intend to seek financial assistance from the Department of War. 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 and 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 and that DO plan to do business with the DoD in addition to Department of State 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 \(nato.int\)](https://eportal.nspa.nato.int/AC135Public/sc/CageList.aspx)

Exemptions

An exemption from the UEI and sam.gov requirements may be permitted on a case-by-case basis. See [2 CFR 25.110](https://www.ecfr.gov/current/title-2/chapter-I/subchapter-B/part-200/subpart-201/section-201.110) 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 of 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.

4. Submission Dates and Times

Applications are due no later than *07/17/2026, 5:00 P.M. (Washington, D.C. time)*

5. Funding Restrictions

i. Funding Restrictions for the 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 United Nations Relief and Works Agency (UNRWA).

ii. 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.

iii. 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:

- 1) 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.

iv. 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:

1) 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).

2) 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.

v. Prohibition on Unmanned Aircraft Systems Manufactured or Assembled by American Security Drone Act-Covered Foreign Entities

(a) *Definitions.*

American Security Drone Act-covered foreign entity means an entity included on a list developed and maintained by the Federal Acquisition Security Council (FASC) and published in the System for Award Management (SAM) at <https://www.sam.gov>

FASC-prohibited unmanned aircraft system means an unmanned aircraft system manufactured or assembled by an American Security Drone Act-covered foreign entity.

Unmanned aircraft means an aircraft that is operated without the possibility of direct human intervention from within or on the aircraft.

Unmanned aircraft system means an unmanned aircraft and associated elements (including communication links and the components that control the unmanned aircraft) that are required for the operator to operate safely and efficiently in the national airspace system.

(b) *Prohibition.* Recipients of funding under this Notice of Funding Opportunity (including subawards and subcontracts issued by the recipient) will be prohibited from:

(1) Delivering any FASC-prohibited unmanned aircraft system, which includes unmanned aircraft (i.e., drones) and associated elements;

(2) Operating a FASC-prohibited unmanned aircraft system in the performance of the award; and

(3) Using Federal funds for the purchase or operation of a FASC-prohibited unmanned aircraft system.

c) *Exemptions, exceptions, and waivers.* The prohibitions described above will not apply if the agency determines that an exemption, exception, or waiver applies and the award indicates that such a determination has been made. [See sections 1823 through 1825 and 1832 of Public Law 118-31 (41 U.S.C. 3901 note prec.) for statutory requirements pertaining to exemptions, exceptions, and waivers.].

vi. **Leahy Law Vetting:** Funds provided under this award are subject to Section 620M of the Foreign Assistance Act of 1961, as amended, a provision titled “Limitation on Assistance to Security Forces” (the “Leahy Amendment”). The Department of State implements the Leahy Amendment requirement by vetting units or individuals proposed for training or other assistance to check for credible information of a gross violation of human rights by such units or individuals. “Security forces” personnel include a member of a foreign police or military unit who will participate in any activity under this award. This includes both civilian and military employees of security forces participating in any activities funded under this award, including training, workshops or meetings, conferences, or other activities.

Vetting Process and Timeline:

- All Iraqi security forces personnel receiving training or equipment must undergo Leahy vetting
- Vetting is conducted by the U.S. Department of State Bureau of Democracy, Human Rights and Labor (DRL)
- Vetting typically requires 30-60 days but may take longer for complex cases
- Recipients must submit vetting nomination packages at least 90 days before planned training events

Recipient Responsibilities:

- Collect required biographical information from all Iraqi participants (full name, date of birth, unit affiliation, rank, national ID number)
- Submit vetting packages through the U.S. Embassy Baghdad
- Maintain roster of vetted individuals and ensure only vetted personnel participate
- Re-vet individuals if there is a break in programming exceeding 12 months
- Budget for potential delays due to vetting timelines

The recipient must coordinate closely with the U.S. Embassy Baghdad's Leahy Vetting Coordinator and should not promise training participation to any individual or unit until vetting is complete.

vii. **National Security Vetting:** Key beneficiaries and partner organization leadership may be required to undergo national security vetting prior to and during program implementation.

6. Other Submission Requirements

All application materials must be submitted electronically through www.Grants.gov or MyGrants.

F. Application Review Information

1. Review Criteria

Each application will be evaluated and rated based on the evaluation criteria outlined below. Criteria are listed in order of importance.

Quality and Feasibility of the Program Idea – 30 points:

- The proposal responds to the NOFO and is appropriate in the context of the proposed country/region.
- The proposal exhibits originality but is feasible.
- The program idea is well developed, with detail about how program activities will be carried out.
- The proposal includes a reasonable implementation timeline.
- The proposal clearly aligns with the stated goal(s), objective(s), and CT outcome(s) in the Executive Summary.
- The proposal directly connects proposed activities with outputs and desired outcomes in both the logic model and PMP.

Organizational Capacity and Record on Previous Grants – 20 points:

- The organization has expertise in its stated field and has the internal controls in place to manage federal funds, including a financial management system and a bank account.
- The proposal demonstrates an institutional record of previous successfully implemented programs in issues and regions outlined in this NOFO.
- The proposal articulates past performance and experience in working with relevant host governments, local organizations, and communities.
- The proposal clearly defines the roles and responsibilities of primary staff under this program and relevant counterterrorism expertise.
- The proposal describes the division of labor among the recipient organization and potential implementing partner organization(s) and identifies local partner organization(s) that would assist with implementation, where appropriate.
- The organization has sufficient capabilities and resources to report and monitor the indicators proposed and collect on those.

Program Planning/Ability to Achieve Program Outcomes – 15 points:

- The proposal provides a detailed and logical model of proposed program activities and includes a clear articulation of how these activities will contribute to or align with the overall outcomes.

- The CT program outcomes in the proposal are specific, measurable, attainable, relevant, and time bound (SMART).
- The proposal clearly demonstrates how the program will benefit the target population with a sound justification.
- The proposal contains a performance monitoring plan (PMP) containing at least three relevant CT Indicators, per CT's "How-To" guidance/template.
- The proposal provides a plan to de-conflict (or complement, if appropriate) with other donors and/or organizations that are active or plan to be active in the proposed program country or region.
- The proposal addresses how the program will engage or obtain support from relevant stakeholders, including host government, to obtain access and conduct programming.
- The proposal includes a contingency plan to account for delays in implementation, achieving program results, or other timeline issues.

Monitoring and Evaluation – 15 points:

- The proposal includes narrative explaining how monitoring will be carried out and who will be responsible for monitoring program activities (including potential contracted experts, if applicable).
- The proposal provides realistic methods for measuring changes that can be correlated with program implementation. These methods may include but are not limited to pre-and/or post-testing of assistance recipients or target audiences, and public perception polling.
- The proposal includes a logic model and theory of change that sequentially maps how program activities are expected to produce results including program inputs, activities, outputs, and CT outcomes.

Budget – 10 points:

- The administration of the proposal budget, including salaries and honoraria, are explained and justified for the work involved.
- Proposed costs are reasonable and necessary and linked to CT program outcomes and demonstrate efficient use of U.S. Government funds.
- Contingency plan demonstrates efficient use of U.S. Government funds.
- The budget justification is detailed.
- Costs are reasonable in relation to the proposed activities and anticipated results.
- The budget is realistic, accounting for all necessary expenses to achieve proposed activities.

Sustainability – 10 points:

- Clearly delineates how program will be sustainable with beneficiaries beyond the life of the grant.
- Clearly outlines plan how impact will be maintained by applicant or others after the grant or if follow on engagements will be required.

2. Indirect Costs

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.

3. Review and Selection Process

A review committee will evaluate all eligible applications. CT will conduct a merit review of all eligible applications as outlined in this NOFO. Applications will be reviewed by an independent review panel consisting of qualified subject matter experts from other Department of State bureaus and offices, U.S. Embassies, and/or other U.S. Government agencies. Final approval resides with the Department of State Grants Officer.

4. Risk Review

i. Risk factors

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:

- a. Financial stability
- b. Management systems and standards
- c. History of performance
- d. Audit reports and findings
- e. Ability to effectively implement requirements

ii. Responsibility/Qualification Information in SAM.gov

The Federal awarding agency, prior to making a Federal award with a total amount of Federal share greater than the simplified acquisition threshold, is required to review and consider any information about the applicant that is in the U.S. government designated integrity and performance system accessible through SAM.gov (see 41 U.S.C. 2313).

An applicant can review and comment on any information about itself in responsibility/qualification records in SAM.gov.

Before making decisions in the risk review required by 2 CFR 200.206, the Department will consider any comments by the applicant, along with information available in the responsibility/qualification records in SAM.gov.

G. Award Notices

The successful 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 counter-signature. The recipient may only start incurring program 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.

Unsuccessful applicants: Unsuccessful applicants will be notified by 9/30/2026 via email.

Payment Method: Payments under this award will be made either through the U.S. Department of Health and Human Services (HHS) Payment Management System (PMS), or through submitting Form SF 270 (Request for Advance or Reimbursement form) to the Grants Officer.

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

H. Post-Award Requirements and Administration

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:

In accordance with the Office of Management and Budget's guidance located at 2 CFR part 200, all applicable Federal laws, and relevant Executive guidance, the Department of State will review and consider applications for funding, as applicable to specific programs, pursuant to this notice of funding opportunity in accordance with the following

- [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, particularly on:
 - Selecting recipients most likely to be successful in delivering results based on the program objectives through an impartial process of evaluating Federal award applications (2 CFR part 200.205),
 - Promoting the freedom of speech and religious liberty in alignment with *Promoting Free Speech and Religious Liberty* (E.O. 13798) and *Improving Free Inquiry, Transparency, and Accountability at Colleges and Universities* (E.O. 13864) (§§ 200.300, 200.303, 200.339, and 200.341),
 - Providing a preference, to the extent permitted by law, to maximize use of goods, products, and materials produced in the United States (2 CFR part 200.322), and

- Terminating agreements pursuant to the U.S. Department of State Standard Terms and Conditions, including, to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities (2 CFR part 200.340). For the avoidance of doubt, the Department has sole discretion over the determination that an award no longer effectuates program goals or agency priorities, and this provision permits awards to be terminated at the Department's convenience, including when it determines that the award no longer advances the national interest.
- [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](#)
- [U.S. DEPARTMENT OF STATE STANDARD TERMS AND CONDITIONS](#)
- Recipients must comply with all applicable Executive Orders. A searchable list can be found in the Federal Register: <https://www.federalregister.gov/>

2. *Reporting*

Reporting Requirements: Recipients will be required to submit financial reports and program reports, as well as accompanying related CT reporting templates, to include an updated quarterly PITT submission that tracks progress toward established targets over time. The award document will specify what reports are required and how often these reports must be submitted.

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

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.

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](#).

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://afsism.service-now.com/ilms/home>. 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. The Contact Center is available 24 hours a day, seven days a week, except federal holidays.

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/>

I. Other Information

Guidelines for Budget Justification

Personnel and Fringe Benefits: Describe the wages, salaries, and benefits of temporary or permanent staff who will be working directly for the applicant on the program, and the percentage of their time that will be spent on the program.

Travel: Estimate the costs of travel and per diem for this program, for program staff, consultants or speakers, and participants/beneficiaries. If the program involves international travel, include a brief statement of justification for that travel.

Equipment: Describe any machinery, furniture, or other personal property that is required for the program, which has a useful life of more than one year (or a life longer than the duration of the program), and costs at least \$10,000 per unit.

Supplies: List and describe all the items and materials, including any computer devices, that are needed for the program. If an item costs more than \$10,000 per unit, then put it in the budget under Equipment.

Contractual: Describe goods and services that the applicant plans to acquire through a contract with a vendor. Also describe any sub-awards to non-profit partners that will help carry out the program activities.

Other Direct Costs: Describe other costs directly associated with the program, which do not fit in the other categories. For example, shipping costs for materials and equipment or applicable taxes. All “Other” or “Miscellaneous” expenses must be itemized and explained.

Indirect Costs: These are costs that cannot be linked directly to the program activities, such as overhead costs needed to help keep the organization operating. If your organization has a Negotiated Indirect Cost Rate (NICRA) and includes NICRA charges in the budget, attach a copy of your latest NICRA. Organizations that have never had a NICRA may request indirect costs of 15% of the modified total direct costs as defined in 2 CFR 200.1.

“Cost Sharing” refers to contributions from the organization or other entities other than the U.S. Embassy. It also includes in-kind contributions such as volunteers’ time and donated venues.

Alcoholic Beverages: Please note that award funds cannot be used for alcoholic beverages.