FEMA Region 6
Procurement Compliance Purple Sheet
FEMA-4950-DR-OK
Incident Period: July 4, 2026

As a condition of Federal Emergency Management Agency (FEMA) funding, projects must be reviewed for compliance with all applicable procurement laws and grant regulations. The intent of "Purple Sheet" is to identify the applicable procurement rules for recipients and subrecipients purchasing under a FEMA award, highlight common issues of noncompliance, and provide helpful resources and points of contact for support, including compliance reviews, training, and guidance related to procurement under grants. FEMA staff are available to answer questions and direct you to other resources as needed.

Procurement Under Grants (PUG) Guidance and Key Contacts

FEMA Region 6 Grants Management Division can assist in addressing any procurement-related questions. Please email us at: FEMA-R6Compliance@fema.dhs.gov.

Procurement Under Grants Website: http://www.fema.gov/grants/procurement

Procurement Training (register through this link): http://www.fema.gov/grants/procurement/training

Procurement Under Grants Policy Guide:https://www.fema.gov/sites/default/files/documents/fena_gpd_procurement-under-grants-policy-guide_fiscal-year-2025.pdf

The Contract Provisions Guide: https://www.fema.gov/sites/default/files/documents/fema_contract-provisions-guide_fy24.pdf

Roadmap to Procurement Compliance (Checklist): https://www.fema.gov/sites/default/files/documents/fema_rsl-gpd_roadmap-to-procurement-compliance_202601.pdf

Purchasing Under a FEMA Award: Exigency or Emergency Circumstances: https://www.fema.gov/sites/default/files/documents/fema_procurement-during-EE_factsheet_fy25.pdf

FEMA Region 6 Grants Management FEMA-R6Compliance@fema.dhs.gov Christina Valle, 202-769-6364	**FEMA Procurement Disaster Assistance Team** (PDAT) fema-gpd-pdat@fema.dhs.gov	**Oklahoma Department of Emergency Management and Homeland Security** Financegroup@oem.ok.gov

Steps to Take During Emergency or Exigent Circumstances for Local Governments and Nonprofits

1. **Request or register for FEMA training and/or consults as needed** – see resources above – we are here to help!
2. **Sole-sourcing** may be allowed for non-state entities during emergency or exigent circumstances, but they must still follow federal procurement regulations. States and tribes follow their own procurement policies and procedures, including their own procedures for emergency or exigent procurements.
3. **Define and justify the period of emergency or exigency**. Write a justification to describe the emergency or exigent circumstances and why sole-sourcing is/may be necessary based on the specific conditions and circumstances. The period of emergency or exigent circumstances may vary per incident.
4. **Estimate the expected dollar amount of the goods or services**: Non-state applicants must complete a cost or price analysis for all procurement transactions above $350,000 to determine that the cost/price is fair/reasonable.
5. **Describe any known conflicts of interests** and efforts made to identify and avoid possible conflicts of interests.
6. **Transition to a competitively bid contract as soon as the emergency or exigent period ends**: Failure to plan for transition to a competitively bid contract cannot be the basis for continued use of the E&E exception.

Always Remember

- ✓ Contracts must include the required contract clauses.
- ✓ For local governments and nonprofits, contracts must include the federal bonding requirements if the contract is for construction or facility improvement.
- ✓ Contracts must be awarded to a responsible contractor. Check Sam.gov for suspension/debarment status.
- ✓ Local governments and nonprofit entities must not use the "cost plus a percentage of cost" and "percentage of construction costs" methods of contracting.
- ✓ When using a time-and-materials contract, local governments and nonprofit applicants must comply with the applicable rules.

Avoid the Top 10 Procurement Under (FEMA) Grants Mistakes

1	Restricting full & Open Competition	6	Missing contract provisions
2	Not performing price/cost analysis ($350k+)	7	Awarding Cost-Plus-Percentage Contract
3	Continue sole source after E&E ended	8	Awarding suspended/debarred contractors
4	Not implementing the general procurement standards	9	Not documenting all procurement history
5	Awarding T&M contract without ceiling price and documenting why no other type is suitable	10	Engaging in sole-source procurement without documenting emergency/exigent situation