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Congress of the United States
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November 17, 2025

The Honorable Kristi Noem
Secretary
Department of Homeland Security
Washington, DC 20528

Mr. David Richardson
Senior Official Performing the Duties of Administrator
Federal Emergency Management Agency
500 C Street, SW Washington, DC 20024

Dear Secretary Noem and Mr. Richardson:

I write to express serious concern regarding the FIFA World Cup Grant Program Notice of Funding Opportunity (NOFO) recently issued by the Department of Homeland Security (DHS) and administered through the Federal Emergency Management Agency (FEMA).

Congress appropriated funds for the 11 U.S. cities that will host World Cup matches in 2026, an event expected to be the largest sporting event in history. These funds are intended to help ensure the safety of millions of attendees. While safeguarding the World Cup is a shared national priority, this NOFO grants the Secretary of Homeland Security extraordinary and unconstrained control over the distribution of this \$625 million in Federal funds. This raises major questions about transparency, governance, and political neutrality.

According to the NOFO, the Secretary has sole discretion over the amount of funding to be awarded to World Cup host cities.ⁱ The NOFO states that no formal scoring or review process will be used. Instead, decisions will be based on unidentified “qualitative criteria,” leaving the cities and public without an objective, auditable record of how funding choices were made.ⁱⁱ This structure invites corruption.ⁱⁱⁱ By law, FEMA’s State Homeland Security Program (SHSP) funds must be distributed according to a clear, risk-based formula – not the personal discretion of any political appointee.^{iv}

Over the past year, DHS has exhibited a troubling pattern of politicization in its management of FEMA’s preparedness grant programs, including SHSP and the Urban Area Security Initiative (UASI). UASI funding for New York City and New Jersey was reduced by a staggering \$147 million – an 85% decrease – with no detailed explanation.^v When funding decisions are made to reward or punish jurisdictions based on partisan political considerations it erodes public trust and directly jeopardizes public safety.

I also have concerns that the framework DHS and FEMA created weakens safeguards against waste, fraud, and abuse. FEMA plans to direct this funding to “Host City Committee Task Forces” – an opaque entity lacking any statutory basis. The NOFO is unclear as to whether State Administrative Agencies will receive funds for Management and Administration (M&A). M&A funds enable states to perform audits and financial monitoring over taxpayer dollars, undermining evaluations of risk and monitoring compliance.^{vi}

Furthermore, FEMA is claiming that the shutdown rendered the agency “unable” to post the NOFO publicly to Grants.gov.^{vii} That claim is inaccurate. Grants.gov remained operational, and the World Cup Program funds derive from appropriations not tied to fiscal year 2025 annual funding, meaning they are not subject to

shutdown restrictions regardless. Withholding or delaying the public posting of this major funding announcement undermines transparency.

Lastly, the NOFO contains two conflicting application deadlines. This suggests a lack of internal coordination. Such basic errors erode confidence in the Agency's ability to manage the program responsibly.

Accordingly, I urge DHS and FEMA to:

1. Clarify the deadline by which State Administrative Agencies must submit application materials to FEMA;
2. Establish a transparent review process for determining the amount of World Cup funds that will be awarded to each host city, including scoring or evaluation standards;
3. Commit publicly that World Cup funding will be allocated strictly based on security considerations and not on political calculations;
4. Define "Host City Committee Task Force," including its legal status, composition, and fiscal-oversight responsibilities;
5. Clarify whether M&A funding will be provided to State Administrative Agencies so they can perform oversight, monitoring, and compliance functions to prevent waste, fraud, and abuse.

My district will host some of the most visible matches of the 2026 FIFA World Cup, including the final championship game. Our state and local public safety agencies have proven records of securing major events in partnership with Federal counterparts. American taxpayers deserve a funding process grounded in transparency and data-driven risk assessment – not politically motivated decision-making.^{viii}

Thank you for your prompt attention to these concerns. I look forward to your timely response detailing how DHS and FEMA intend to safeguard the integrity and impartiality of this critical grant program.

Sincerely,



Nellie Pou
Member of Congress

ⁱ DHS, *Notice of Funding Opportunity, FIFA World Cup Grant Program* (on file with the Committee on Homeland Security of the U.S. House of Representatives).

ⁱⁱ *Id.*

ⁱⁱⁱ H.R. Rep. No. 119-106 (119th Cong., 1st Sess. 2025), <https://www.congress.gov/119/crpt/hrpt106/CRPT-119hrpt106-pt1.pdf>.

^{iv} Pub. L. No. 107-296, § 2007.

^v Compl., *State of Illinois v. Kristi Noem et al.*, No. 1:25-cv-00495, (D.R.I., Sept. 29, 2025), <https://storage.courtlistener.com/recap/gov.uscourts.ri.60525/gov.uscourts.ri.60525.1.0.pdf>.

^{vi} 2 C.F.R. § 200.232.

^{vii} FEMA Advisory, *FEMA Announces Over \$1 Billion in Federal Funding to Secure the FIFA World Cup Games and Protect Americans* (Oct. 28, 2025) (on file with the Committee on Homeland Security of the U.S. House of Representatives).

^{viii} Steven Goff, *The World Cup is one year away. Is the U.S. ready?* WASHINGTON POST (June 11, 2025) <https://www.washingtonpost.com/sports/2025/06/11/2026-world-cup-tickets-stadiums-usmnt>.