

RAIN-2027-G01

Prohibition on the Purchase and Operation of FASC-Prohibited Unmanned Aircraft Systems Under EPA Assistance Agreements

Notification Date: October 1, 2026

Effective Date: December 22, 2025

Purpose: This Recipient/Applicant Information Notice (RAIN) informs recipients and applicants of EPA's implementation of the Office of Management and Budget (OMB) Memorandum M-26-02, "Ensuring Government Use of Secure Unmanned Aircraft Systems and Supporting United States Producers" (November 21, 2025), which effectuates the American Security Drone Act of 2023 (ASDA), Pub. L. No. 118-31.

Summary: Pursuant to section [1825 of the American Security Drone Act of 2023](#) (P.L. 118-31), effective December 22, 2025, EPA recipients and subrecipients are prohibited from using EPA financial assistance for the procurement or operation of [Federal Acquisition Security Council \(FASC\) – prohibited Unmanned Aircraft Systems \(UAS\)](#). Prohibited unmanned aircraft systems are ones manufactured or assembled by a covered foreign entity that presents a security risk. A list of covered foreign entities is developed and maintained by the FASC and published in the [System for Award Management](#).

Action: All EPA assistance agreement recipients and subrecipients are prohibited from using federal funds for the purchase, operation, or use of FASC-prohibited unmanned aircraft systems. This prohibition extends to subrecipients including borrowers under EPA funded revolving loan programs. The prohibition applies to any previously purchased FASC-prohibited unmanned aircraft systems in use on an EPA grant award.

EPA assistance agreement recipients and subrecipients can verify the status of any unmanned aircraft systems used or planned for purchase under their award by following these steps:

1. Check the FASC Covered Foreign Entity List published in the [System for Award Management](#) before purchasing or operating any unmanned aircraft systems.
2. The FASC Covered Foreign Entity List directs users to the Consolidated Screening List where unmanned aircraft system manufacturers can be searched by name. If the unmanned aircraft system's manufacturer appears on the list, federal funds are not allowed for its purchase and the equipment is not to be used for the project.
3. EPA recipients and subrecipients must keep a record of their search in their award file to document compliance. The record must include the date the Consolidated Screening List was searched, the unmanned aircraft system manufacturer and model checked, and the overall search result indicating whether the items to be procured or operated are prohibited.

It is the sole responsibility of pass-through entities receiving EPA funds to communicate this requirement to their subrecipients including borrowers under EPA funded revolving loan fund programs.

To fully implement these prohibitions, EPA has updated our [General Terms and Conditions](#).

EPA recipients should contact the Project Officer and Grants Specialist listed on their award document if they have questions about whether these requirements apply to their project or how to document

compliance.