### **Abstract**

Nonprofit leaders face a challenging close to 2025 as the critical year-end fundraising season unfolds amid heightened economic pressure, workforce shortages, and new federal oversight measures. This week's Navigator highlights how nonprofits are managing surging holiday-season demand, adapting to federal funding uncertainty under a continuing resolution, and responding to significant policy, HR, IRS, and state-level developments. With shifting federal rules, rising compliance burdens, slowing government grants, and increased operating costs, organizations must strengthen resilience, sharpen operational planning, and maximize the effectiveness of year-end giving strategies. This update equips you with actionable insights to navigate regulatory volatility, protect revenue streams, manage risk, and maintain organizational stability during the highest stakes fundraising period of the year.

# November 24, 2025 Navigator News Update: Including Nonprofits During the Year-End Holiday Season and Federal Funding Uncertainty Through January 2026 — and More!

From Nonprofit Management Navigator

Please see Understanding This Information and Disclaimer at the conclusion of the article

## Introduction

As you head into the most mission-critical giving period of the year, the nonprofit operating environment remains exceptionally fluid. Year-end donations—still the backbone of nonprofit revenue—are arriving just as organizations confront federal funding uncertainty, new regulatory and HR obligations, rising operating costs, and increased state-level compliance requirements. At the same time, demand for nonprofit services continues to accelerate, particularly in food security, housing, education, and community support programs stretched by holiday-season pressures and the recent SNAP disruption.

This week's Navigator distills the developments nonprofit leaders must understand right now—highlighting federal regulatory shifts, HR compliance risks, IRS and accounting updates, and major state news affecting funding, privacy, and security grants. Each section begins with a short

Executive Summary and Key Actions designed to help you make sense of rapid changes, protect your funding streams, mitigate risks, and prepare for the pivotal first quarter of 2026. Our goal is to help you stay informed, adaptive, and strategically focused during this high-stakes period.

## **Priority Legend**

Priority indicators help nonprofit leaders quickly identify which developments require their most immediate attention based on urgency and operational impact.

Immediate Action

Requires Organizational Response

Monitor and Prepare

# **Nonprofit News**



Nonprofits are entering the most consequential fundraising period of the year amid rising service demand and federal funding instability. Holiday giving patterns remain strong, but year-end pressure is compounded by continued SNAP disruptions, surging community needs, and ongoing uncertainty as the federal government operates under a continuing resolution through January 30, 2026. Federal grant processing has resumed post-shutdown, though tight timelines and shifting program guidance continue to affect operations. Nonprofits must prepare for compressed application cycles, fluctuating donor behavior, and broader economic stress on families who rely on nonprofit support during winter months.

# **Key Actions for This Section**

- Strengthen year-end giving campaigns and messaging emphasizing holiday-season need.
- Prepare contingency plans for January 2026 funding disruptions due to the continuing resolution.
- Document SNAP-related increases in service demand to support emergency funding requests.
- Communicate proactively with federal program officers regarding grant timelines and allowable modifications.
- Mobilize additional volunteers for peak seasonal operations and staff shortages.

# Nonprofits During Year-End Holiday Season and Thanksgiving

The holiday season beginning with Thanksgiving represents the most critical fundraising period for nonprofits, with 62% of Americans planning donations in November-December, approximately one-third of annual giving occurring in December, and some organizations generating as much as 50% of their annual revenue in the final two months. Nonprofits play a vital role during the holiday season when food insecurity peaks for many families as winter costs rise—heating bills, holiday meals, and school breaks without free lunches—requiring charities to distribute millions of pounds of food and expand outreach while year-end donations help stock shelves, fuel deliveries, and determine operational capacity for the upcoming year.

### Source:

https://www.philabundance.org/a-guide-to-end-of-year-giving-why-it-matters-and-how-to-make-it-count/

## Role and Importance of Nonprofit Volunteers at Year-End

Volunteers provide the backbone of nonprofit organizations offering critical support to fulfill missions and serve communities, dedicating their time and energy to furthering causes and ensuring campaign success throughout the year, particularly during fundraising and awareness campaigns. While more than 75.7 million Americans formally volunteered last year for nearly 5 billion service hours, nonprofit professionals report organizations often receive an influx of volunteers around the holidays corresponding with particular events, though formal volunteering continues rebounding from pandemic lows while nonprofits nationwide struggle to recruit and retain volunteers, making year-end engagement strategies more important than ever.

### Source

https://www.pbs.org/newshour/nation/thinking-about-holiday-volunteering-heres-how-to-make-it-go-the-distance

# Continuing Resolution Creates Funding Uncertainty Through January 2026

Most federal agencies operate under continuing resolution through January 30, 2026, creating budget uncertainty for nonprofits dependent on federal contracts and grants. The short-term funding measure maintains current spending levels but limits new program initiatives. Organizations should develop contingency plans for potential funding disruptions, diversify revenue sources, and strengthen relationships with non-federal funders to reduce dependency on government support during this volatile period.

### **Source:**

https://www.councilofnonprofits.org/impacts-recent-executive-orders-nonprofits

# **Output** Federal Grant Processing Resumes With Short-Term Stability

Federal agencies resumed processing grant applications and awards following the shutdown, though most operate under continuing resolution funding through January 30, 2026. Previously paused programs are restarting, but nonprofits face compressed timelines and potential policy shifts. Organizations should verify project timelines with program officers and document shutdown-related delays for potential grant modifications.

### **Source:**

https://www.usgrants.com/us-federal-grants-and-funding-updates-after-government-reopening-november-2025-8.htm



## SNAP Program Disruption and Restart Impact

The Trump administration froze SNAP funding beginning November 1, 2025—the first time in the program's six-decade history—affecting 42 million recipients, before federal judges ruled the pause unlawful and ordered restoration of benefits, though the administration initially provided only partial funding before eventually agreeing to full benefits. The disruption pushed increased demand toward food banks, shelters, and community organizations already stretched thin by federal funding holds, with nonprofits experiencing record donation surges from individual donors while facing their own operational challenges as delayed SNAP benefits created additional strain on the nonprofit sector serving families, children, and seniors at risk.

### Source:

https://www.cnbc.com/2025/11/04/snap-food-bank-donations-hunger-relief.html

# **Education Department Finalizes Controversial PSLF Eligibility Rule**

The Department of Education finalized regulations on October 30 narrowing Public Service Loan Forgiveness eligibility despite widespread opposition from nonprofits, labor groups, and public-sector stakeholders. The rule takes effect July 1, 2026, allowing exclusion of organizations with "substantial illegal purpose"—defined vaguely to potentially include immigrant services, gender-affirming care providers, and advocacy groups. Nonprofits must assess workforce recruitment and retention risks as employee loan payment uncertainty

increases.

### Source:

https://independentsector.org/blog/public-service-loan-forgiveness-final-rule/

## C Federal Courts Block Trump Administration DEI **Executive Order Provisions**

Federal courts continued blocking enforcement of certification requirements in Trump's anti-DEI executive orders during November, with litigation ongoing in multiple circuits. The 7th Circuit is hearing appeals on provisions requiring federal contractors and grantees to certify nonengagement in "illegal DEI." Chicago Women in Trades secured preliminary injunction protecting its Labor Department grants. Nonprofits with federal funding should monitor court proceedings and avoid altering DEI programs until legal clarity emerges. Source:

https://www.npr.org/2025/11/19/nx-s1-5611496/trump-dei-women-construction-jobs



## **Nonprofit Operating Cost Increases in 2026**

Organizations are projecting mean salary increase budgets between 3.2% and 3.5% for 2026, down from 3.7% actual in 2025, though healthcare and social service organizations continue experiencing higher wage pressure at 4.5% growth over the twelve-month period ending June 2025. Nonprofits face increased unemployment insurance tax rates and wage bases across multiple states in 2026, plus the ongoing impact of new overtime rules requiring organizations to either raise salaries to \$58,656 by January 2026 or begin paying overtime, with estimated costs of \$44.8 million sector-wide. These increases strain nonprofit budgets, requiring organizations to balance competitive compensation with limited revenue growth while managing rising administrative costs that could force difficult choices about staffing levels and program delivery. Source:

https://astronsolutions.net/compensation-trends/

## AHA Report Highlights Nonprofit Hospital Community **Benefits**

The American Hospital Association released new analysis estimating that nonprofit hospitals deliver community benefits valued at more than eleven times the value of their federal tax exemption. While centered on health-care institutions, the findings reinforce the scrutiny applied to nonprofit tax-exemption standards more broadly. Policymakers may use this data in future

reviews of nonprofit community-benefit reporting, making it important for all nonprofit leaders to ensure their own mission-aligned outcomes are documented clearly.

### Source:

https://www.aha.org/news/headline/2025-11-17-report-nonprofit-hospitals-value-communitiesmore-11-times-federal-tax-exemption

# **Nonprofit Regulatory Developments**



## **E** Executive Summary

Federal regulatory scrutiny intensified throughout late 2025, increasing compliance responsibilities for nonprofits engaged in advocacy, grant-funded activities, and public policy work. New lobbying rules expand registration requirements for organizations spending even modest time on advocacy. Executive orders and federal memoranda broaden agency authority to review, terminate, or restrict grants based on shifting political priorities. Additional oversight affects DEI programs, public safety concerns, and tax-exempt standards, while Treasury and IRS guidance signals significant upcoming rulemaking for exempt organizations. Nonprofits must strengthen compliance tracking, update internal controls, and prepare for rapid regulatory shifts that could impact funding eligibility and mission-critical activities.



## **Key Actions for This Section**

- Audit staff advocacy time to ensure compliance with new federal lobbying-registration thresholds.
- Conduct enterprise-wide risk assessments tied to grantmaking, program activities, and funding sources.
- Review DEI, immigration-related, and public-policy programs for alignment with new federal oversight directives.
- Prepare board-level briefings on forthcoming Treasury/IRS guidance projects affecting exempt organizations.
- Update grant-management systems to accommodate stricter termination and review provisions.

## New Rule: More Nonprofits Must Register as Lobbyists **Under Stricter Federal Rules**

A ruling announced Oct. 31 2025 expands federal lobbying-registration obligations for organizations, including nonprofits, requiring any organization that lobbies eight or more hours in a rolling four-week period to register. Nonprofits engaged in public policy or advocacy must audit hours, update tracking systems, register appropriately, and potentially increase staffing or legal support to ensure compliance.

### Source:

https://futureofgood.co/more-non-profits-and-organizations-must-register-as-lobbyists-under-stricter-federal-rules/

# Presidential Memorandum on Countering Domestic Terrorism and Organized Political Violence

The memorandum issued Sept. 25 2025 directs federal agencies to strengthen oversight of organizations, including nonprofits, to prevent funding or support of domestic terrorism or organized political violence. Nonprofits must now evaluate their grantmaking, funding sources, and program activities to ensure none could be construed as linked to prohibited conduct. Boards should adopt stronger due-diligence and risk-monitoring frameworks immediately.

### Source:

 $\underline{https://www.unitedphilforum.org/resources/executive-actions-impacting-philanthropic-nonprofit-sectors}$ 

# Federal Government Intensifies Grant Oversight and Termination Authority

Executive orders issued throughout 2025 direct federal agencies to implement immediate termination provisions in grant agreements and conduct comprehensive reviews of existing awards. Agencies must assess whether grants fund activities related to DEI initiatives, immigration services, or positions contrary to administration priorities. The changes authorize termination "for convenience" if awards no longer advance "agency priorities or the national interest," creating unprecedented uncertainty for nonprofits dependent on federal funding partnerships and forcing organizations to develop contingency plans.

### Source:

https://www.councilofnonprofits.org/articles/proposed-changes-federal-grants

# Treasury & IRS Issue 2025–2026 Priority Guidance Plan Affecting Tax-Exempt Organizations

On Sept. 30 2025 the Internal Revenue Service and Department of the Treasury released the 2025–26 Priority Guidance Plan, signalling forthcoming guidance projects that include Section 501(c)(3) issues, public-policy and race-discrimination standards, and regulatory burden

reduction. For nonprofits this means anticipating change: review governance, compensation, fundraising and advocacy practices now in preparation for formal rule-making and guidance issuance.

### **Source:**

https://nonprofitlawblog.com/treasury-and-irs-2025-2026-priority-guidance-plan/

# ○ IRS & Treasury Guidance on "No Tax on Tips" Provision Under One Big Beautiful Bill

On Sept. 19 2025 the IRS and Treasury issued guidance defining occupations that "customarily and regularly receive tips" under tax-law changes, listing nearly 70 occupations. While not exclusively nonprofit-targeted, this affects nonprofits running covered tipped-worker programs. Nonprofits must audit payroll classifications, ensure correct tip-reporting, and update payroll systems to avoid mis-classification penalties.

### **Source:**

https://www.irs.gov/newsroom/treasury-irs-issue-guidance-listing-occupations-where-workers-customarily-and-regularly-receive-tips-under-the-one-big-beautiful-bill

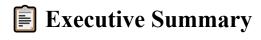
# **ORS Webinar: Exempt Organizations Update with Focus on E-Filing and Guidance Changes**

On Sept. 17 2025 the IRS posted an Exempt Organizations Update (webinar announcement) covering recent law and guidance changes, including electronic filing requirements for tax-exempt organizations. Nonprofits need to ensure their e-filing systems are ready, that board and staff are trained, and that future guidance notices are monitored—increasing risk for those still using outdated filing procedures.

### **Source:**

https://www.irs.gov/charities-non-profits/exempt-organizations-update

# Nonprofit Human Resources Developments



HR compliance pressures on nonprofits continue to escalate as federal agencies revise employment rules and courts reshape the regulatory landscape. The Pregnant Workers Fairness Act (PWFA) remains subject to ongoing legal challenges and religious-organization carve-outs,

requiring careful policy review. At the same time, the Department of Justice's new DEI-related guidance places nonprofits receiving federal funds under heightened scrutiny regarding nondiscrimination, hiring, volunteer engagement, and grant-funded employment practices. Statelevel privacy laws in Oregon and Delaware add new data-handling, training, and recordmanagement obligations affecting HR, IT, and operations. Nonprofits must proactively adjust policies, strengthen documentation, and prepare staff for a more complex employmentcompliance environment in 2026.

## **Key Actions for This Section**

- Update PWFA accommodation procedures and consult counsel regarding potential religious exemptions.
- Conduct a full audit of hiring, DEI, and volunteer-management policies in light of DOJ
- Train HR and program staff on new state privacy laws, including required documentation and handling of employee data.
- Monitor PWFA litigation outcomes for changes affecting compliance requirements.
- Ensure contractors and sub-recipients comply with federal nondiscrimination rules tied to grant funding.

# **EEOC Settles PWFA Litigation with Religious Organization Over Abortion Accommodations**

On November 19, 2025, the Equal Employment Opportunity Commission agreed to a permanent injunction exempting a Missouri-based Christian education foundation from providing workplace accommodations for abortion under Pregnant Workers Fairness Act regulations. The settlement resolves litigation challenging the agency's authority to require religious nonprofits to accommodate employees seeking elective abortions. Religious organizations must assess whether similar exemptions apply to their circumstances while maintaining compliant accommodation processes for other pregnancy-related conditions covered under PWFA. Source:

https://www.law360.com/articles/2413204

# ODJ Releases New Technical Assistance for Federal **Grant Recipients on DEI-Related Employment Practices**

The Department of Justice issued updated guidance clarifying that federal-funded DEI, equity, or inclusion programs must comply with nondiscrimination laws and cannot use racial or other protected-class preferences unless strictly allowed by law. The guidance underscores that

nonprofits receiving federal funds remain responsible for ensuring contractor and sub-recipient compliance. Nonprofits should immediately audit HR-related DEI initiatives, hiring programs, volunteer programs, and any grant-funded employment practices to ensure alignment with federal civil-rights standards.

### Source:

**Source:** 

https://www.vorys.com/publication-recipients-of-federal-funds-directed-to-align-diversity-equity-and-inclusion-practices-with-department-of-justice-guidance

# Ongoing PWFA Litigation Challenges EEOC Regulatory Interpretation

Multiple legal challenges continue targeting aspects of the Pregnant Workers Fairness Act regulations, with states, religious organizations, and businesses contesting the EEOC's interpretive authority and scope of required accommodations. A May 2025 district court ruling ordered removal of requirements related to elective abortion accommodations, while other cases proceed through federal courts. Despite ongoing litigation, the EEOC continues enforcing PWFA provisions. Nonprofits must maintain compliant accommodation processes while monitoring judicial developments that may modify regulatory requirements or employer obligations.

https://nationalpartnership.org/report/know-your-rights-pregnant-workers-fairness-act/

# **Obligations for Nonprofits**State Privacy Laws Create New Data Protection Obligations for Nonprofits

Oregon and Delaware implemented enhanced privacy protection laws in 2025 requiring numerous nonprofits to adopt more stringent data handling standards. Multi-state organizations face complex compliance obligations reconciling varying state requirements with federal standards. Nonprofits must audit data collection, storage, and sharing practices, implement enhanced security protocols, provide employee training on privacy requirements, and establish procedures for handling data subject requests. The patchwork of state laws creates significant compliance costs for organizations operating across multiple jurisdictions.

https://themjcos.com/2025/02/nonprofit-sector-trends-to-watch-in-2025/

# IRS, Accounting and Finance Developments

# **Executive Summary**

The IRS has resumed normal operations following the lengthy federal shutdown, but nonprofits should expect backlogs in determinations, reinstatements, and correspondence well into December. A series of IRS and Treasury updates—including the 2025–2026 Priority Guidance Plan, electronic-filing requirements, and updated due-date tables—signal increased enforcement and stricter compliance expectations for exempt organizations. Nonprofits must prepare for enhanced filing scrutiny, new digital-compliance standards, and major changes tied to the One Big Beautiful Bill, which preserves certain charitable incentives while introducing new limitations. Recent high-profile fraud prosecutions underscore the importance of strong internal controls. Nonprofits should closely monitor IRS and Treasury guidance, update filing systems, and ensure boards understand emerging compliance risks.

# **Key Actions for This Section**

- Prepare for IRS delays and update filing calendars to reflect potential backlog impacts.
- Review internal controls and financial-oversight practices in light of recent IRS enforcement cases.
- Train staff on expanded electronic-filing mandates and ensure systems meet IRS digitalcompliance standards.
- Brief boards and finance committees on the 2025–2026 Priority Guidance Plan and potential rulemaking.
- Evaluate implications of new tax provisions (e.g., 0.5% AGI floor, reduced deduction values) on fundraising projections.

# **OPERATE OF STREET OF STRE**

The IRS announced the full resumption of normal operations following the 2025 federal shutdown, ending weeks of processing delays that affected exemption applications, refund workflows, and taxpayer correspondence. Nonprofits relying on IRS determinations or timesensitive filings should anticipate a backlog as staff work through accumulated submissions. Organizations waiting for 990 acknowledgments, reinstatement decisions, or determination-letter processing should monitor timelines closely and prepare for continued delays in early December. **Source:** 

 $\frac{https://www.irs.gov/newsroom/irs-resumes-normal-activities-following-the-2025-lapse-in-appropriations}{}$ 



The IRS and Treasury's 2025–26 Priority Guidance Plan highlights upcoming changes impacting exempt organizations, including political-activity rules, donor reporting, and burden-reduction efforts. While not final, the plan signals regulatory tightening in several core compliance areas. Nonprofits should monitor anticipated rulemakings, prepare board updates, and review internal policies related to lobbying, grants, and disclosures. Early preparation reduces compliance risk once formal guidance is issued.

### Source:

https://www.afslaw.com/perspectives/alerts/irs-and-treasury-release-2025-2026-guidance-planwhat-tax-exempt-organizations



## TCJA Expirations Replaced by July 2025 Provisions

The One Big Beautiful Bill Act addressed expiring provisions from the 2017 Tax Cuts and Jobs Act scheduled to sunset at the end of 2025, making permanent the more generous standard deduction increased to \$15,750 for single filers and \$31,500 for joint filers in 2025 indexed to inflation annually, with most of the revenue reduction coming after 2025 when major TCJA provisions were scheduled to expire. The law preserves higher AMT exemption amounts and phaseout thresholds while reducing the number of taxpayers who itemize from 32 percent to about 14.2 percent in 2026, and raises average after-tax incomes by 2.9 percent in 2025 and 5.4 percent in 2026, with the income increase higher in 2026 because TCJA individual tax provisions were not scheduled to expire until after the end of 2025. For nonprofits, this means the feared reversion to pre-2017 charitable giving incentives was avoided, but new restrictions including the 0.5% AGI floor and reduced deduction values for high-income donors create different challenges for fundraising.

### Source:

https://taxfoundation.org/research/all/federal/one-big-beautiful-bill-act-tax-changes/

# IRS Criminal Investigation Announces Guilty Pleas in **Nonprofit Fraud Case**

IRS Criminal Investigation reported that three executives of the Primary Health Network, a nonprofit medical provider, pleaded guilty to defrauding the organization of millions of dollars. Although the case involves a healthcare entity, the message is broad: nonprofit boards must maintain strong internal controls and financial oversight. The announcement underscores the IRS's continued post-shutdown enforcement focus on governance failures and misuse of charitable assets.

### **Source:**

https://www.irs.gov/compliance/criminal-investigation/three-leaders-of-primary-health-networkplead-guilty-to-defrauding-non-profit-medical-organization-of-millions-of-dollars

# **Council of Nonprofits Issues November 17 "Nonprofit Champion" Update**

The National Council of Nonprofits published its November 17 policy update summarizing federal developments impacting nonprofits, including IRS processing delays and federal budget uncertainty. While not an IRS publication, it identifies operational effects nonprofits must prepare for in late 2025, including potential impacts on filing deadlines, grant administration, and compliance timelines. Nonprofit leaders should review the update for broader federal context shaping IRS operations and sector-wide risk exposure.

### Source:

https://www.councilofnonprofits.org/nonprofit-champion-november-17-2025-0

## How the IRS Can—and Cannot—Revoke Exempt Status

TNPA's analysis explains limits on IRS authority but underscores its active use of audits, proposed revocations, and appeals processes when nonprofits violate exemption requirements. Violations involving private benefit, political intervention, or inadequate governance remain high-risk areas. Nonprofits should strengthen compliance monitoring, ensure board oversight, and document mission alignment to withstand scrutiny. Strategic preparation reduces the likelihood of enforcement actions or reputational harm.

### Source

 $\underline{https://tnpa.org/nonprofits-under-fire-how-the-irs-can-and-cannot-revoke-federal-tax-exempt-status/$ 

# Form 990 Electronic Filing Mandate Expands for Asset Thresholds

Organizations with \$200,000 or more in assets must file Form 990 electronically as of 2025, with paper forms facing processing delays and potential penalties up to \$20,000. The electronic filing requirement includes all schedules and attachments, with Schedule J now demanding deeper disclosure of executive compensation arrangements. Nonprofits must invest in compatible accounting software, train staff on e-filing procedures, and implement internal controls ensuring accurate and timely electronic submissions to avoid substantial late-filing penalties.

Source:

https://silentgconsulting.com/understand-the-501c3-nonprofit-rule-changes-for-2025/



## IRS Guidance Page for TE/GE Programs Updated

The IRS refreshed its Tax-Exempt and Government Entities (TE/GE) program page, which aggregates notices, regulations, and compliance updates affecting exempt organizations. Although the November review did not introduce new rules, it confirms current guidance and signals active oversight as the agency returns to full operations. Nonprofits should periodically review TE/GE pages to confirm they are working from updated guidance, especially during lateyear filing and planning cycles.

### **Source:**

https://www.irs.gov/newsroom/tax-exempt-government-entities

# IRS Clarifies Return Due Dates for Exempt-**Organization Filings**

Updated IRS due-date tables provide clearer guidance on filing deadlines for Forms 990, 990-EZ, 990-PF, and 990-N, depending on fiscal-year end. The clarification helps organizations reduce late-filing errors, which can lead to penalties or even automatic revocation. Nonprofits should update compliance calendars, confirm extension procedures, and ensure staff understand new timelines. Maintaining accurate filing discipline strengthens donor confidence and protects eligibility for federal grants and partnerships.

### **Source:**

https://www.irs.gov/charities-non-profits/return-due-dates-for-exempt-organizations-annualreturn

# IRS Reaffirms Electronic Filing Requirements for **Exempt Organizations**

The IRS reiterated that most exempt-organization returns—including Forms 990, 990-EZ, 990-PF, 4720, and 990-T—must be filed electronically under Taxpayer First Act requirements. Organizations relying on outdated systems may face filing rejects, delays, or penalties. Nonprofits should confirm their e-filing capacity, test systems with vendors, and update internal filing procedures. Strengthening digital-compliance workflows will prevent administrative disruption during peak filing periods.

### **Source:**

https://www.irs.gov/publications/p557

# **State Nonprofit News**

## Executive Summary

State developments this week focus on enhanced data-privacy requirements, increased arts and culture funding, expanded public safety resources, and new county and foundation grant opportunities across the country. Nonprofits operating in multiple states must prepare for varying and expanding compliance demands, especially in the areas of data privacy and charitable registration. Several states announced major grant cycles—representing both opportunities for new funding and elevated competition, particularly in arts, education, community services, and security preparedness. These developments underline the importance of monitoring state-level opportunities and policy changes that directly affect nonprofit funding, reporting obligations, and program design.

## **Key Actions for This Section**

- Audit data-collection and storage processes to comply with Oregon and Delaware privacy
- Track state and county grant calendars for 2026 program funding.
- Prepare strong documentation for security and preparedness grant applications.
- Confirm state charitable registration requirements when pursuing new grant opportunities.
- Assess collaboration opportunities to strengthen competitiveness in state-level funding cycles.

# States Implement Enhanced Data Privacy Standards for **Nonprofits**

Oregon and Delaware are implementing new laws in 2025 requiring numerous nonprofit organizations to follow more stringent privacy standards. The state-level requirements add complexity to compliance obligations for multistate organizations and create potential conflicts with federal standards. Nonprofits must assess their data collection, storage, and sharing practices to ensure compliance with varying state privacy regimes while managing costs of implementing enhanced security protocols and conducting regular privacy audits across iurisdictions.

### Source:

https://themjcos.com/2025/02/nonprofit-sector-trends-to-watch-in-2025/

# New York Awards \$63 Million in Arts & Culture Grants to Nonprofits

New York State awarded more than \$63 million in arts and culture funding through NYSCA, supporting over 2,400 nonprofits statewide. Many awards went to small and mid-sized groups, reinforcing the state's emphasis on regional cultural stability. Nonprofits should monitor NYSCA's next funding round, as multi-year funding patterns will shape program planning throughout 2026.

### **Source:**

https://www.governor.ny.gov/news/governor-hochul-announces-63-million-arts-and-culture-grants-awarded-new-york-state-council

# Ohio Emergency Management Highlights FEMA Nonprofit Security Grant Program

Ohio EMA issued a statewide notice reminding at-risk nonprofits of available federal security-grant funding under FEMA's NSGP. The program supports security enhancements, planning, and preparedness for nonprofits facing elevated threats. Ohio organizations should expect increased competition and must submit vulnerability assessments and investment justifications aligned with FEMA scoring criteria.

### **Source:**

https://ema.ohio.gov

# TFEC Opens Pennsylvania Grant Cycle for 2026 Nonprofit Funding

The Foundation for Enhancing Communities (TFEC) opened its first 2026 grant cycle on November 1, supporting Pennsylvania nonprofits delivering regional community services. Eligible organizations must demonstrate measurable public benefit and meet Pennsylvania's charitable-registration requirements. Nonprofits should prepare early, as TFEC routinely prioritizes clear outcomes, audited financials, and community partnerships.

### **Source:**

https://www.tfec.org

# United Way of St. Johns County Opens Strategic Grant Fund Applications

United Way of St. Johns (Florida) opened its Strategic Grant Fund on November 17, inviting nonprofits to apply for support tied to local impact goals. Funding focuses on education, economic mobility, and health initiatives. Applicants must demonstrate clear outcome measures and collaborative approaches, as competition for United Way funds remains intense in Florida counties.

### **Source:**

https://www.unitedway-sjc.org

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The New Jersey Center for Nonprofits highlighted Mercer County's Local Arts Program (LAP) grants and an accompanying November 19 webinar for arts nonprofits. The program supports cultural programming and nonprofit arts capacity within the county. New Jersey arts groups should track this and similar county grant cycles, as state—county partnerships often require strict compliance with reporting and accessibility standards.

### Source:

https://njnonprofits.org

# California Nonprofits Eligible for Statewide Safety and Preparedness Grants

Cal OES reaffirmed ongoing application opportunities for state and federal nonprofit safety grants supporting security enhancements for at-risk organizations. The program remains a key funding avenue for faith-based institutions, community centers, and culturally targeted nonprofits. California nonprofits should prepare for rigorous documentation standards, including threat assessments and cost-benefit alignment with state scoring rules.

### **Source:**

https://www.caloes.ca.gov

# Summary

This week's Navigator highlights an increasingly complex operating landscape for nonprofit leaders. Year-end giving and seasonal service demands coincide with federal funding uncertainty, renewed regulatory scrutiny, and shifting employment-compliance obligations. IRS operations have resumed but with expected delays, emphasizing the need for strong financial controls and timely digital compliance. States continue to expand privacy obligations and introduce competitive funding opportunities across arts, culture, safety, and community-impact programs. Together, these developments require heightened organizational agility: strengthening strategic planning, investing in compliance infrastructure, reinforcing documentation and reporting practices, and adapting quickly to policy and funding changes. Nonprofit leaders who proactively prepare for these evolving risks and opportunities will be best positioned to navigate the demanding close of 2025 and enter 2026 with resilience and confidence.

### **About Nonprofit Management Navigator**

Nonprofit Management Navigator is a trade name of PMG46, LLC doing business as Nonprofit Management Navigator. Nonprofit Management Navigator provides this complimentary weekly subscription service designed for nonprofit leaders. This essential resource provides curated news updates on the legal, regulatory, and operational developments impacting organizations, saving executives time while keeping them informed about the important changes directly impacting their organizations. In addition to timely news, Nonprofit Management Navigator also offers in-depth reports and practical management guidance to help leaders navigate an increasingly unpredictable operating environment. What makes Nonprofit Management Navigator particularly valuable is its commitment to accessibility—the entire service is available as a complimentary subscription, ensuring critical operational intelligence reaches nonprofit leaders regardless of budget limitations during these chaotic regulatory times.

## **Understanding This Information and Disclaimer**

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