Nonprofit Security Grant Program -National Security Supplemental Frequently Asked Questions

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General Program Questions

1. What is the purpose of the Nonprofit Security Grant Program - National Security Supplemental?

The Nonprofit Security Grant Program – National Security Supplemental (NSGP-NSS) supplements one of three grant programs that support the U.S. Department of Homeland Security (DHS)/Federal Emergency Management Agency's (FEMA) focus on enhancing the ability of state, local, tribal and territorial governments, as well as nonprofit organizations, to prevent, protect against, prepare for, and respond to terrorist or other extremist attacks. These grant programs are part of a comprehensive set of measures authorized by Congress and implemented by DHS to help strengthen the nation's communities against potential terrorist or other extremist attacks. The NSGP provides funding to nonprofit organizations at high risk of a terrorist or other extremist attack for facility hardening and other physical security enhancements and activities. The NSGP-NSS was authorized by Congress to bolster nonprofit security and protect those organizations facing an elevated threat level due to the Israel-Hamas war.

2. How much funding is available under the NSGP-NSS?

The total amount of funding available under the NSGP-NSS is \$210 million:

- \$105 million for NSGP-NSS-Urban Area (UA); and,
- \$105 million for NSGP-NSS-State (S).



3. What is the difference between NSGP-NSS-UA and NSGP-NSS-S?

NSGP-NSS-UA provides funding to nonprofit organizations and consortium of nonprofit organizations located within an FY 2024 Urban Area Security Initiative (UASI)-designated high-risk urban area. NSGP-NSS-S provides funding for nonprofit organizations and consortium of nonprofit organizations located outside of fiscal year (FY) 2024 UASI-designated high-risk urban areas.

The NSGP-NSS Notice of Funding Opportunity (NOFO) includes a list of the FY 2024 UASI-designated high-risk urban areas.

4. When will the NSGP-NSS NOFO be released, and where will it be located?

The NSGP-NSS NOFO was released on Oct. 28, 2024, and is available online at www.fema.gov/grants as well as on www.grants.gov.

5. Who is eligible to apply for NSGP-NSS funds?

The State Administrative Agency (SAA) is the only entity eligible to apply for NSGP-NSS funds. The SAA applies to FEMA on behalf of eligible nonprofit organizations and consortia of nonprofit organizations (subapplicants) that are at high risk of terrorist or other extremist attack.

6. How do nonprofit organizations and consortia apply?

Eligible nonprofit organizations and consortia must apply to their <u>SAA</u> for NSGP-NSS funds. Nonprofit organizations and consortia may not apply to FEMA directly.

The <u>SAA</u> is the only eligible applicant and submits applications to FEMA on behalf of subapplicants. Contact your <u>SAA</u> for information on how to apply.

7. What is the application period and deadline?

The application period started when the NSGP-NSS NOFO was released on Oct. 28, 2024, and will be open for 88 days. The application deadline for subapplicants is determined by your <u>SAA</u>. Contact your <u>SAA</u> for details on the application deadline.



8. What is a period of performance (POP) for the NSGP-NSS?

The POP is the amount of time you have to complete your proposed projects. For the NSGP-NSS, the POP for the SAA is 36 months. SAAs generally impose a shorter POP for nonprofit organizations and consortium, so it is important to check with your SAA. The POP also includes any Environmental Planning and Historic Preservation (EHP) considerations required for the project, if applicable. For more information on the EHP process, consult the <u>Subapplicant Quick Start Guide</u>.

The NSGP-NSS is a reimbursement grant. Only expenditures incurred during the POP listed in your subaward documentation from the SAA are allowable.

9. What other resources are available to address general programmatic, technical, and financial questions?

- For general questions regarding preparedness grant programs, please contact the FEMA Grants News at (800) 368-6498 or by e-mail at fema.dhs.gov, 9 a.m. 5 p.m. ET, Monday through Friday.
- For additional resources on FEMA preparedness grant programs, visit Preparedness Grants | FEMA.gov.
- For additional resources on FEMA procurement and grant processes, visit
 Contracting with Federal Funds for Goods and Services Before, During and After Disasters | FEMA.gov.
- For support regarding financial grants management and budgetary technical assistance, applicants may contact the FEMA Award Administration Help Desk at ASK-GMD@fema.dhs.gov.
- For NSGP-NSS-specific questions, e-mail <u>FEMA-NSGP@fema.dhs.gov</u>, or reference our other existing resources, including the NSGP-NSS NOFO and Ancillary Documents.

Nonprofit Organization Eligibility

10. How do I determine whether a nonprofit organization is eligible?

To be eligible for the NSGP-NSS, a nonprofit organization and all nonprofit organizations within a consortium must:



- Meet the description under section 501(c)(3) of the Internal Revenue Code (IRC) of 1986 and be exempt from tax under section 501(a) of such code;
- For NSGP-NSS-UA, be located within one of the FY 2024 UASI-designated high-risk urban areas; for NSGP-NSS-S, be located outside of the FY 2024 UASI-designated high-risk urban areas; and,
- Be able to demonstrate, through the application, that the organization is at high risk of a terrorist or other extremist attack.

11. Can the lead member of a consortium pass through funds to other eligible nonprofit organizations?

No. If successful, the lead consortium member will accept the subaward on behalf of the consortium, implement the approved projects/contracts for all consortium member sites, and manage the subaward throughout the period of performance, to include ensuring that all terms and conditions of the subaward are met.

12. Which NSGP-NSS sub-program should I apply for?

If the physical address of the nonprofit organization for which you are applying is within a FY 2024 UASI-designated high-risk urban area, then you must apply to NSGP-NSS-UA. If the physical address of the nonprofit organization for which you are applying is outside of a FY 2024 UASI-designated high-risk urban area, then you must apply to NSGP-NSS-S. If you are unsure whether your nonprofit organization's physical address is located within or outside of a FY 2024 UASI-designated high-risk urban area, contact your SAA. SAAs and nonprofit organizations should be aware that city limits do not always equate to the UASI footprint.

For consortium applications, all nonprofit organizations within a consortium application must be eligible under the applied-for funding stream. For example, if a consortium applies to the SAA to receive funding under NSGP-NSS-UA, all nonprofit organizations within the consortium must be located within the same FY 2024 UASI-designated high-risk urban areas.

13. Can organizations that have received funding or have been rejected in the past from the NSGP apply for the NSGP-NSS?



There is no prohibition on applying to the NSGP-NSS if you have received previous NSGP funding or been rejected from receiving NSGP funding in past years.

14. Can nonprofit organizations apply for both state-funded and federally-funded grants?

Several states have state-led programs very similar to the federal DHS/FEMA NSGP-NSS. There is no prohibition at the federal level to apply for both programs. Please contact the SAA concerning the state program for any restrictions.

15. What is the maximum amount of funding I can apply for? Can I apply for multiple locations/facilities for the same organization?

Nonprofit organization subapplicants with one site may apply for up to \$200,000 for that site. Subapplicants with multiple sites may apply for up to \$200,000 per site for up to three sites per NSGP-NSS-UA and NSGP-NSS-S funding stream, for a maximum of \$600,000 per nonprofit organization per state. Each unique site must have a unique Vulnerability Assessment and completed Investment Justification (IJ). If a nonprofit organization has physical locations both within and outside of a FY 2024 UASI-designated high-risk urban area, they may apply to both funding streams (NSGP-NSS-S and NSGP-NSS-UA) but may not exceed a total of six applications for a total of \$600,000 in requested funding per state. In states with no urban area, no more than three applications per nonprofit organization are allowable.

Consortium applications are also permitted for the NSGP-NSS. Consortium may apply for a maximum of \$1,000,000. Awards over \$250,000 must comply with the Build America, Buy America Act (BABAA). For more information, see the NSGP-NSS NOFO. The \$200,000 per site maximum still applies for each individual nonprofit organization within the consortium. Total funding available for consortium applications is limited to 25% of the NSGP-NSS award allocation, or \$52,500,000.

- Up to \$26,250,000 is available for consortium subapplicants in NSGP-NSS-S.
- Up to \$26,250,000 is available for consortium subapplicants in NSGP-NSS-UA.

Applications that are received for the wrong funding stream (NSGP-NSS-UA or NSGP-NSS-S) will be deemed ineligible.



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16. What constitutes a site when applying for NSGP-NSS funding?

The NSGP-NSS defines a "site" as a singular address or physical building. If a nonprofit organization has multiple buildings at the same address, each building can be identified by name (e.g., "Building A," "Building B"). Each site applying for funding must have its own unique Vulnerability Assessment and application.

Application Development for Subapplicants

17. What do I need to submit to my SAA to apply for NSGP-NSS funds?

Each eligible nonprofit organization must submit the following to their SAA:

Vulnerability Assessment

A vulnerability assessment specific to the location/facility for which the nonprofit organization is applying. Currently, there are no other FEMA-specific requirements for the Vulnerability Assessment, but SAAs may have state-specific requirements. Consortium applications must include Vulnerability Assessment(s). They can be either one shared and collective assessment or separate/individual ones for every site.

NSGP-NSS IJ

The IJ is a required application form used to apply for NSGP-NSS funds. It includes sections on the nonprofit organization's risks, vulnerabilities, and the proposed projects that are intended to address or mitigate the identified risks and vulnerabilities. Proposed projects must be for the locations that the nonprofit organization occupies at the time of application. The IJ must:

- Demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA;
- Be both feasible and effective at reducing the risks for which the project was designed;
- Be able to be fully completed within the three-year period of performance; and,



■ Be consistent with all applicable requirements outlined in the funding notice and the Preparedness Grants Manual.

The IJ, and in the case of consortium applications, the Consortium Workbook, are the only documents submitted to FEMA by the SAA for applications. As a result, it is important to avoid referencing out to any external materials in your IJ.

Consortium IJs should contain references to the required Consortium Workbooks. Please consult the Subapplicant Quick Start Guide or the NSGP-NSS Consortium Application Guide for more information on completing the IJ.

Mission Statement

A Mission Statement and any mission-implementing policies or practices that may elevate the organization's risk must also be submitted to the SAA. The SAA will use the Mission Statement, along with the information provided in the IJ, to determine the central purpose of the organization and will validate the nonprofit 'organization type' selected by the nonprofit organization in the IJ. The organization type may be one of the following: 1. Ideology-based/Spiritual/Religious (Houses of Worship, Religious Schools, etc.), 2. Educational (Secular), 3. Medical (Secular), or 4. Other.

SAA-optional documentation

Some SAAs may allow supporting documentation related to actual incidents that have occurred at the location/facility, if applicable. This documentation could include items such as police reports, insurance claims, or photographs; include a brief description of the items you are submitting in your IJ. Be sure to check with your SAA if optional supporting documentation is allowed.

Any other SAA-required documentation

Contact your <u>SAA</u> to get information on any additional requirements.

18. What is a consortium application?

A consortium application is an opportunity for an eligible nonprofit organization to act as a lead and apply for funding on behalf of itself and any number of other



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participating NSGP-NSS eligible nonprofit organizations. A consortium of nonprofit organizations must fill out one IJ (done by the consortium lead nonprofit organization) and the Consortium Workbook, in addition to the Vulnerability Assessment(s) and Mission Statements. All nonprofit organizations in the consortium application must be compliant with the NSGP-NSS eligibility requirements. Nonprofit organizations may not apply individually and as part of a consortium. The lead nonprofit organization and its partners must be the intended beneficiaries of the requested funding. The lead nonprofit organization shall not distribute grant-funded assets or provide grant-funded contractual services to noncompliant partner nonprofit organizations or other ineligible organizations. If successful, the lead consortium member will accept the subaward on behalf of the consortium, implement the approved projects/contracts for all consortium member sites, and manage the subaward throughout the period of performance, to include ensuring that all terms and conditions of the subaward are met.

For additional information on consortium applications, please consult the NSGP-NSS Consortium Application Guide.

19. What makes a strong IJ?

- Clearly identified risks, including threats, vulnerabilities, and consequences;
- Description of findings from a previously conducted Vulnerability Assessment;
- Details of any incidents including description, dates, etc.;
- Brief description of any supporting documentation (such as police reports or photographs) that is submitted to the SAA as part of the application, if applicable;
- Explanation of how the investments proposed will mitigate or address vulnerabilities identified in a vulnerability assessment;
- Verification that all proposed activities are allowable costs per the NSGP-NSS NOFO;
- Realistic milestones that consider the EHP review process, if applicable; and,
- Description of the project manager(s) and level of experience.

20. What are ways that a nonprofit organization can demonstrate that it is at a high risk of a terrorist or other extremist attack?



Ways an organization can demonstrate that it is at high risk of a terrorist or other extremist attack include but are not limited to:

- Describe any incidents that have occurred at the facility.
- Describe any threats (e.g., verbal threats, vandalization) made against the organization.
- Describe current events with specific attention to incidents impacting organizations that have been targeted due to a similar mission, belief, or ideology.
- Contact organizations/agencies that can provide information on the current threat environment, such as local law enforcement agencies, local emergency management offices, Federal Bureau of Investigation Field Offices, or Regional Protective Security Advisors. To reach a Protective Security Advisor, email Central@cisa.gov.
- If selecting that an organization is experiencing heightened threat due to the Israel-Hamas war, describe any recent incidents, threats, or tensions faced as a result of the ongoing conflict.

21. Why am I required to self-identify with one of the following four categories: 1) Ideology-based/Spiritual/Religious; 2) Educational; 3) Medical; or 4) Other?

As noted in question 20, organizations that are at heightened risk due to their ideology, beliefs, or mission are prioritized in the final scoring process.

Organizations that are at heightened risk resulting from the Israel-Hamas war will also be prioritized during the final scoring process.

If you are an organization that has any form of religious affiliation, you are encouraged to select "Ideology-based/Spiritual/Religious" as your nonprofit category to ensure your organization is prioritized correctly in scoring.

22. What kinds of security-related activities are allowable?

Allowable costs include contract security, as well as planning, equipment, training, and exercises. Below are some examples:

- Planning activities related to the development of plans such as:
- Security Risk Management Plans;



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- Continuity of Operations Plans; and,
- Response Plans.
 - Equipment –those items listed in the <u>Authorized Equipment List</u> as allowable under NSGP.
- Training:
- Active shooter training; and,
- Security training for employees or members of the organization.
 - Response exercises.

For a complete description on allowable activities, see the NSGP-NSS NOFO and the FY 2024 Preparedness Grants Manual.

23. What is the maximum percentage allowed for management and administration (M&A) of the program?

Subrecipients may use up to 5% of their subaward for M&A purposes. M&A expenses must be based on actual expenses or known contractual costs. Requests that are simple percentages of the award, without supporting justification, will not be allowed or considered for reimbursement. M&A costs for the NSGP-NSS are calculated as up to 5% of the total federal award allocated to the subrecipient, not on final expenditures at close out.

24. Does the NSGP-NSS allow funding for outreach and technical assistance?

NSGP-NSS allows for states and territories to utilize up to 2% of the total grant awarded to provide outreach and technical assistance to eligible nonprofit organizations. Outreach and technical assistance sourced with this additional funding should prioritize rural and underserved communities and nonprofit organizations that are traditionally underrepresented in the program. If a state would like to receive this funding, they must indicate that in their FEMA GO application.

25. Do nonprofit organizations have to own the building they apply for?

No, but any work funded by the NSGP-NSS must be permissible to the owner.

26. Can the building for an application be under construction?



Nonprofit organizations must be occupying and fully operational out of the facility listed in their Vulnerability Assessment and IJ at the time of application to be eligible for funding.

27. What is a Unique Entity Identifier (UEI) and how long is it valid for?

Please consult the Subapplicant Quick Start Guide for more information on UEIs.

28. How should a nonprofit organization determine the pricing for proposed projects in the IJ?

Nonprofit organizations should base their cost requests on reasonable estimates, which can include rough estimates received from vendors prior to applying, an online search of quotes for similar projects, etc., and organizations are encouraged to reasonably incorporate the potential for price changes. Nonprofit organizations are NOT required or expected to use exact numbers; educated estimates are acceptable. The same vendors can bid on the final project unless there is a conflict of interest. Policies and procedures on managing conflicts of interest for preparedness grants can be found in the Preparedness Grants Manual

Nonprofit organizations must ALWAYS abide by federal and state procurement guidelines.

Application Review and Subaward

29. If I receive a subaward, where can I learn more about procurement policies?

As stated in question 28, <u>nonprofit organizations must ALWAYS abide by federal and state procurement guidelines</u>. Your SAA as the grant recipient will provide information for how procurement is managed in your specific state. States interpret federal guidance and integrate this guidance into their state guidance. For more information on federal procurement, please see <u>Resource Library:</u> <u>Purchasing Under a FEMA Award | FEMA.gov</u> and <u>Procurement Under Grants Training | FEMA.gov</u>.

30. How will my application be reviewed or evaluated?



NSGP-NSS applications will be scored by the SAA in coordination with its state, territory, and urban area partners, as applicable. The SAA will submit a prioritized list of IJs with all scores to FEMA. FEMA will not undertake a full scoring of each individual IJ as in previous years. In the final scoring process, organizations that are at risk due to their ideology, beliefs, or mission are prioritized. Organizations facing a heightened threat resulting from the Israel-Hamas war will also be prioritized during the final scoring process. Additionally, organizations that are located in a disadvantaged community (based on the Climate and Economic Justice and Screening Tool) are prioritized.

Consortia applications and individual nonprofit organization applications are scored, ranked, and prioritized separately.

Based on the review process described above, FEMA will then make funding recommendations to the Secretary of Homeland Security. All final funding determinations will be made by the Secretary, who retains the discretion to consider other factors and information in addition to FEMA's funding recommendations. For additional information on how IJs are reviewed and scored at the SAA and federal levels, please refer to the NSGP-NSS NOFO.

31. Is there a security review performed on my application?

Yes, there is a security review performed by the DHS Office of Intelligence and Analysis on prospective subrecipient nonprofit organizations. This review takes place after the competitive scoring and selection process is complete. The information provided is limited to the organization's name and physical address, as submitted by the nonprofit organization.

32. What are the requirements for nonprofit organizations to work with or share information with law enforcement?

There are no requirements for information sharing between nonprofit organizations and federal, state, local, tribal and/or territorial law enforcement. However, the NSGP-NSS seeks to bring nonprofit organizations into broader state and local preparedness efforts, including with law enforcement, by removing barriers to communication and being more inclusive.

33. How does FEMA EHP factor into the NSGP-NSS?



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Please consult the Subapplicant Quick Start Guide for more information on EHP.

34. If my organization receives funds through the NSGP-NSS, will the federal government be able to impose restrictions on my organization in any other area of policy that may contradict the religious and/or other beliefs of my organization?

FEMA/DHS oversight and involvement is limited to monitoring the appropriate use and stewardship of federal grant dollars. Please note that some federal requirements apply to the life of the equipment or property purchased using federal grant funds.

