



## **FY 2020 JFNA/SCN Webinar**

### **Accompanying Notes**

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#### **I. Intro NSGP/Slide 4**

On December 11, 2001, the United States Senate Committee on Governmental Affairs held the first Federal hearing on “The Local Role in Homeland Security in the wake of 9/11.

At that time JFNA, then the United Jewish Communities, submitted a statement for the record setting forth the justification and recommendations for what would become the NSGP program.

From that point to the present JFNA has led the advocacy effort to establish and fund the program.

The Department of Homeland security was created in November 2002, and the Nonprofit Security Grant Program was established two years later (on October 18, 2004).

FY 2020 is the 15<sup>th</sup> phase of the program and we are already very immersed in advocating for funding for next year’s program.

#### **II. National Preparedness Goal: Preparedness, Mitigation, Response & Recovery/Slide 9**

The NSGP program supports the country’s shared national preparedness responsibility (or goal) to achieve a secure and resilient nation.

Towards this end, the following are the enumerated core capabilities (or elements) the Department of Homeland Security has established to achieve the National Preparedness Goal.

As we discuss later in the Impact section of the power point, an applicant for NSGP resources will need to identify one or more of these core capabilities it will achieve through their project.

Failing to clearly identify the applicable capabilities will negatively impact an applicant’s score.

### III. Funding Allocations/Slide 10

For this program Phase (FY 2020), Congress increased funding by 50% (from \$60 million to \$90 million). This will support a minimum of 900 grant awards, up from 718 awards last year.

The funding will be split between the two prongs of the program.

Congress determined that NSGP-UA will receive \$50 million and NSGP-S \$40 million. The entirety of the additional funding secured this year will bolster the statewide program, which was funded at \$10 million last year and the year before.

FEMA will determine which urban areas will be eligible for participation in the NSGP-UA program and the allocation each participating urban area will receive based on a risk calculation. FEMA will also set the funding allocations each state will receive under NSGP-S. It should be noted that if an urban area is not included for eligibility under NSGP-UA, it would be eligible under the NSGP-S option.

FEMA has established a 3-year period of performance, although most projects are generally completed within a shorter timeframe.

Additionally, the state or federal reviewers may prefer projects with completion times that do not drag on. As we discuss later in the power point, applicants must set forth their estimated program time-line in the Project Milestones Section of the application.

Following general federal grant practices, the NSGP awards are paid out through a reimbursement system as a precaution against misuse of funds. The sub-grantees are required to lay out the money for the approved project investments and activities and submit reports to the State Administrative Agency substantiating their outlays in order to seek reimbursement. Only permissible uses of the funds will be reimbursed.

In speaking with FEMA, we expect that the Notice of Funding Opportunity will be announced a week from tomorrow (or Feb. 14<sup>th</sup>). This will activate the SAAs, who will have between 45 and 60 days to receive, score and submit sub-grant applications to FEMA. Within this time frame, each SAA will establish the grant period to receive sub-grant applicants. We expect nonprofits will have about 30 days to complete and submit their applications to their SAAs.

We also expect FEMA will establish a funding award cap of \$100 thousand for both NSGP-UA and NSGP-S prongs, although the SAAs, especially under the NSGP-S program, may establish a lower cap in order to make a greater number of awards across the state.

Awards must be announced by mid-night September 30<sup>th</sup>, and typically the announcements are made in early September.

#### **IV. Authorized Equipment and Allowable Costs/Slide 11**

As previously mentioned, the program can support a variety of permissible costs, from target hardening to emergency preparedness planning and training.

On target hardening, the program is limited to two categories of physical security equipment and inspection and screening systems – from bollards and parking lot lighting to access control systems, video surveillance, secure locks and doors, and more. The SAA will direct applicants to FEMA’s Approved Equipment List, which specifies the various eligible subcategories for target hardening.

When we review Sections III and IV of the Investment Justification, we will address in greater detail what target hardening entails, as well as the types of training, planning and exercises that can be utilized under the grant.

#### **V. Unallowable Costs/Slide 12**

All permissible costs to be considered for funding using the NSGP must be included in the applicant’s Investment Justification. If it’s not included, equipment and/or activities normally permissible will become ineligible for funding.

Additionally, pre-award costs are generally unallowable, such as reimbursement for pre-award security investments, conducting the vulnerability/risk assessment or costs associated with completing the Investment Justification.

**I note that it is permissible for a nonprofit organization that receives a subaward under NSGP to allocate up to 5 percent of their budget on Management and Administration costs associated with the subaward.**

#### **VI. Evaluation Criteria/Slide 14**

The enumerated criteria apply to both NSGP-UA and NSGP-S. The application is structured to assess how well an applicant meets these requirements. Our written guidance is geared to satisfying these criteria.

For scoring purposes, as we get into later, it is paramount that all applicants make clear that they are at a high risk of terrorist attacks due to their ideology, beliefs, or mission. If the applicant does not make this case, typically they will NOT score high enough to secure a grant.

Additionally, applicants will be evaluated to make sure they have made the correct designation for applying to either NSGP-UA or NSGP-S (which is based on their address) and whether they have previously received NSGP funding in prior phases. We expect that there will be a 5-point bonus to the state score for all organizations that have not received NSGP funding in previous years. More on this later.

## **VII. Role of the State/Slide 15**

When FEMA releases its Notice of Funding Opportunity for the NSGP program, they are addressing the NOFO to all of the States' designated homeland security/emergency management agencies (referred to in the grant guidelines as State Administrative Agencies or SAAs). The SAAs are the actual applicants of the NSGP program, and they are responsible for administering NSGP on behalf of the nonprofit sub-grantees.

The sub-grantees will look to their SAAs for all of the official guidance, instructions and applications. They are the sub-grantees' points of contact. In most circumstances, there would be no reason for a sub-grantee to engage FEMA directly. That would be a red flag.

It should be noted that the State Administrative Agencies may operate their NSGP programs somewhat differently from state to state, as FEMA guidelines provide the SAAs with a degree of latitude and discretion in how they proceed. As such, while JFNA and SCN will assist sub-applicants based on the overarching FEMA-provided guidance, the SAAs interpretation and application of those guidelines is paramount (the final word) to the sub-applicants in their jurisdictions.

Under these circumstances, all applicants should carefully review the instructions and requirements posted or provided by their respective SAA and to rely utmost on the state guidance or any additional details or requirements provided by their SAA.

**I note that sometimes SAAs do make mistakes in processing FEMA guidance, and we can be a resource in those events to facilitate a clarification or remedy from FEMA.**

## **VIII. Examining the Grant Process/Slide 16**

The application is called an Investment Justification or IJ.

These are the seven parts to the Investment Justification, which we will review in order. Some but not all of the sections have character limitations and most but not all of the sections will be scored.

However, completeness is paramount as even sections that are not scored specifically, will still be evaluated and can impact the final score.

**Consequently, all sections should be treated with the same level of importance and care and none should be taken for granted.**

## IX. Applicant Information/Slide 17

The first section focuses on the applicant's general demographics. This seems innocuous enough, but this is not the case.

How an applicant responds to **"Organization Type"** could make the difference between securing a grant or not. In answering this question, it is imperative to make the connection to the organization's Jewish-faith, values, learning, heritage and life.

Additionally, each nonprofit is required to submit a Mission Statement along with the IJ, and the statement should similarly reflect the organizations Jewish identity and connectivity to Jewish community.

**As you draft your responses always be thinking about how to articulate how your ideology, beliefs or mission make you a high risk-of a terrorist attack.**

Also, the physical address question will determine whether the applicant applies under NSGP-UA or NSGP-S.

With respect to providing a 501(c)(3) Number (or EIN), certain organizations such as churches, mosques, and synagogues are automatically exempt and are not required to provide recognition of exemption. They would leave the EIN number blank. **Some SAAs may require these exempt organizations to submit an affidavit or other statement certifying their exempt status.**

## X. Background/Slide 18

There are two parts to this section.

In the first part, the applicant should make the case that the type of organization it is, and its role and place in the community, make it a likely target of terrorism. This could be exemplified by its membership, mission statement, services offered, population served, and its symbolic value in the community.

For example, for more than 100 years, the Federation continues to be recognized in the community as the central body for raising funds and helping to coordinate programs and services to advance multiple aspects of Jewish life in our community, nationally and abroad.

In the second part, the applicant must explain any role it has in responding to or recovering from a terrorist attack. It is this second part that many applicants struggle to answer because they do not see themselves in a responder role.

Another example, the Federation is a member of JVOAD (or Jewish Voluntary Organizations Active in Disaster) and raises funds to respond to man-made and natural disasters such as the recent earthquake in Puerto Rico and in response to the devastating attacks on September 11. Often in a crisis, we open our doors and services to first responders, serving as a central meeting point for them and providing them with respite support they need to successfully do their jobs.

**Our written guidance provides recommendations on how to respond to these questions, as well as every other aspect of the application.**

## **XI. Risk/Slide 19**

NSGP is a risk-based program.

In making decisions, the determination of risk is a central factor in how the SAAs and FEMA rank and prioritize the applications they review. This is why each applicant must provide a Vulnerability/Risk Assessment, which serves as a framework for the applicant to use to identify risks and weaknesses and prioritize resources that address their most critical security needs.

The Risk Section of the IJ has three parts to complete that address the specific or relative threats to the applicant; the identified vulnerabilities (or weaknesses) in their physical security and/or emergency preparedness planning and training; and the consequences or impact a terrorist threat would have on the applicant, its staff, volunteers, constituents and community.

A good Vulnerability/Risk Assessment will identify any specific record of or relevant threat to the applicant and describe the vulnerabilities to be addressed through the grant award. It should spell out the specific protective measures required or recommended (whether target hardening, planning, training or exercises) that would most efficiently and effectively counter the risks, minimize the vulnerabilities and mitigate the potential consequences of an attack.

Whatever the quality of the Vulnerability/Risk Assessment is, the applicant must address these questions as best they can, and the materials we provide are intended to help in that way.

**I note that we will delve further into the Vulnerability/Risk Assessment and the contextualization of risk (and threat) in subsequent slides.**

## **XII. Contracted Security Personnel/Slide 27**

The ability to contract security personnel (or off-duty police) was first allowed under this program last year, with the limitation that no funding could be used to purchase equipment for the contracted security.

The guidance also implied that the applicant must be able to sustain this capability in future years without NSGP funding. However, this was an expression of concern rather than a requirement.

We expect that contracted security personnel will be a continued eligible cost this year.

**I note that this is not a typically funded investment under the FEMA emergency preparedness grant programs and the SAAs may treat it differently from state to state.**

### **XIII. Project Milestones/Slide 28**

This question goes to competency. The SAAs and FEMA want to have confidence in the applicant's understanding of the scope and nature of their project and that the project can be completed within the 36-month period of performance.

Milestones may include the hiring of vendors; ordering, acquiring and installing equipment; planning, scheduling and carrying out training; submitting required paperwork, and so forth. As I mentioned previously, a long and drawn out process that sets forth unusual, insufficient or unrealistic timelines and goals will raise red flags during the review process.

**Our written guidance provides a sample sequence of possible milestones from program start to finish, which you can draw from.**

### **XIV. Project Management/Slide 29**

This section also serves as a confidence builder in the review process. It shows that the applicant has a management plan worked out, has assigned responsibilities to competent people, has thought through the process and identified any potential challenges it might have to address or resolve during project implementation.

**This section also importantly provides an opportunity for the applicant to highlight how the grant opportunity will promote coordination and collaboration with state and local security and law enforcement or other public partners (such as first responders and hospitals).**

By way of illustration, perhaps local law enforcement conducted the applicant's Vulnerability/Risk assessment. Perhaps they will lead or participate in preparedness training or table-top exercises. Perhaps they will have some role in program management oversight, particularly with respect to the investments they may have recommended in the assessment. If any of these apply, they should be described in this section.

**The takeaway is to find a way to incorporate community responder assets into the framework of project planning and management.**

## **XV. Impact/Slide 30**

In this section, the applicant should explain the expected measurable outcomes of the completed project. Two responses are required:

First, there should be a statement on how the investments set forth in Section IV will counter the risks, reduce the vulnerabilities and mitigate the consequences of a potential terrorist attack identified in Part III. In other words, explain how the investments in Section IV will efficiently and effectively address the risks/vulnerabilities/consequences in Section III.

Second, there should be a statement describing how the project will achieve one or more of the core capabilities that were discussed earlier: How the project will prevent, protect, mitigate, respond to and/or recover from an act of terrorism.

An illustration: The Vulnerability/Risk Assessment found that the day school was vulnerable to an intruder because it has multiple unsecured entry points and no access controls. It is vulnerable to an intrusion that could place the lives of the students, faculty and visitors at risk of an active shooter incident. Other schools have previously been targeted by active shooters. This could lead to multiple casualties including loss of life. It is possible that the school would not be able to recover and remain open in the community if such an incident were to occur. Through the acquisition and installation of an access control system and creating a single point of entry, the school will be able to **Prevent** a possible Active Shooter attack.

**Our upcoming written guidance will delve into the particulars of each core capability.**

**XVI. Scoring/Slide 31**

The grant is highly competitive.

Therefore, an applicant should never leave an open question. Partial answers are better than no answers and our written guidance is intended to help prompt answers.

Additionally, applicants must be especially careful to answer the questions asked where asked. The right answer placed in the wrong place in the IJ will earn zero points.

Additionally, while there is a maximum raw score of 40 points that can be earned, the final score will be calculated by a factor between 1 and 3, depending on how an organization describes its organization type.

For example: An applicant that illustrates that it is at high risk of a terror attack due to its ideology, beliefs or mission will have its raw score multiplied by a factor of 3, tripling its final score, where as an applicant that simply describes itself as an educational institution will have its raw score multiplied by a factor of 2, only doubling its final score.

**An illustration: As we know, a Jewish day school is not simply a school. It may include religious services and Jewish learning. It may be pro-Israel. It may fly the Israeli flag alongside the American flag. Its mission may state it is pro Zionist. The school's name may identify it as Jewish. It may open its doors to host Jewish festivals, and so on. These characteristics would make a school at high risk for a terrorist attack because of its ideology, beliefs and mission. Each applicant must do its best to make this point based on their particulars.**

One last scoring point. As I previously mentioned, we expect that FEMA will add a 5-point bonus to the state score for all organizations that have not received NSGP funding in previous years. This is down from a 10-point bonus established last year.

The reason for this bonus is that the demand for the grant far exceeds the available resources. The bonus attempts to incorporate fairness into the program.