



Nonprofit Security Grant Program: Preliminary Guidance Vulnerability/Risk Assessment

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Before proceeding, if you are a New York-based applicant, please contact David Pollock, Associate Executive Director, and Director of Public Policy & Security, JCRC of New York, on all matters pertaining to the NSGP application process at: pollockd@jrcny.org <http://www.jrcny.org/security>. The below guidance is for all other applicants.

Overview

The NSGP provides funding support for hardening and other physical security enhancements to nonprofit organizations that are at high risk of terrorist attack. NSGP project funding is based on the ability of the proposed project to mitigate the risk factors identified in the application (the Investment Justification (IJ)). (A copy of the FY 2019 IJ is attached. The entire IJ will be reviewed in later guidance.) The risk factors for which the IJ is based are derived from a vulnerability/risk assessment each NSGP project applicant must conduct and submit to the State Administrative Agency. NSGP projects are assessed based significantly on the ability of a proposed project to mitigate the risk factors identified in the IJ. **Past applicants who have recently conducted a risk/vulnerability assessment may rely on it again for FY 2020.** However, they will be limited to addressing the risks set forth in the previously conducted assessment. They will need an assessor to redo, update or modify the prior assessment if they want to capture emerging risks and the corollary investments.

Vulnerability/Risk Assessment Preliminary Guidance

Each applicant must include a vulnerability/risk assessment on which its application is based, and which is to be submitted with the application to the state agency administering the application process. The vulnerability/risk assessment helps to identify and prioritize resources to address the most critical needs and to ensure transparent, accountable and effective use of grant funds to address identified gaps in existing capabilities.

Often local police departments will conduct such an assessment, as do private companies. Also, our colleagues at the Secure Community Network (SCN) (and related federation security directors as applicable) may be able to help, as described in Recommendation 3, below.

In practical terms the vulnerability/risk assessment is used to complete two sections of the application (IJ): Part III. Risk and Part IV. Target Hardening & Training.

The Part III. Risk section focuses on three questions pertaining to Threat, Vulnerabilities, and Potential Consequences of an attack. **We recommend that an applicant's vulnerability/risk assessment address these variables as follows:**

- **Threat:** The identification and substantiation of prior threats or attacks against the applicant or a closely related organization by a terrorist organization, network, or cell (to include both foreign and domestic terrorists or violent homegrown extremists);
- **Vulnerabilities:** An explanation of the ways the organization is susceptible to destruction, incapacitation, or exploitation by a terrorist attack; and
- **Potential Consequences:** The discussion of potential negative impacts on the applicant's asset, system, and/or network if damaged, destroyed, or disrupted by a terrorist attack.

The Part IV. Target Hardening & Training section is where the applicant describes the proposed target hardening and training activities that address the identified threat, vulnerabilities and potential consequences established in Part III. Only specified permissible costs set forth in this section will be considered for funding. Permissible costs include:

- **Equipment:** Funding may be used for target hardening and physical security enhancements, limited to two categories: Physical Security Enhancement Equipment (Section 14 of the authorized equipment list) and Inspection and Screening Systems (Section 15 of the authorized equipment list) The authorized equipment list may be reviewed at: <http://www.fema.gov/authorized-equipment-list>.
- **Planning:** Funding may be used for security or emergency planning expenses and the materials required to conduct planning activities.
- **Exercise:** Funding may be used to conduct security-related exercises.
- **Training:** Funding may be used for security-related training of security staff, volunteers or members/congregants.
- **Hiring:** Funding to support contracted security personnel were allowed for the first time in FY 2019. Whether it will be permissible of not in FY 2020 will be determined in the upcoming Notice of Funding Opportunity.

Recommendations

Recommendation 1 – Risk Assessor Should be Familiar with the IJ

Whoever is conducting the risk assessment an applicant should make sure that assessor is familiar with the IJ template, and, particularly, the Risk and Target Hardening & Training sections, and designs of furnishes the assessment with the necessary format and details to answer these sections. Relying on the risk/vulnerability assessment, the applicant should ensure a clear, cohesive and rational connections between the risks identified in Part III and the solutions (or investments) identified in Part IV. Part III explains the risks, vulnerabilities, and consequences of an attack or threat. Part IV describes the recommended improvements (permissible costs) that would best address and minimize the identified risks, vulnerabilities, and consequences. There should be continuity between these sections; together they establish that the applicant fully understands its vulnerabilities and the best approaches to mitigating the risks. The application will be assessed through a two-phase state and Federal review process based significantly on the ability of a proposed project to mitigate the risk factors identified in the IJ.

Recommendation 2 – Emergency Planning & Training Activities should be Considered

Historically the NSGP has been restricted to purchases related to target hardening and physical security equipment. In recent years, funding allowances have expanded to place a priority focus on training and other planning and preparedness activities, to include the development of emergency plans and procedures. As we have seen in past incidents and attacks, training and emergency response plans are some of the best investments organizations can make as part of a comprehensive security program and have saved lives. As such, **we encourage applicants to include emergency planning and training activities as part of their grant applications.**

Recommendation 3 -- The Secure Community Network may be Helpful

The Secure Community Network (SCN)¹ provides a range of services to assist organizations and facilities in support of the NSGP process. With respect to grant applications, SCN provides assessments as well as services in support of the application process. Post-grant award, SCN can provide technical information and advice. Additionally, SCN provides several training courses, tabletop exercises and related preparedness and training opportunities that may be funded with NSGP grant funds. We encourage you to contact SCN as you begin your planning process and for assistance with assessments and critical infrastructure planning consultation. Note: Due to the volume of requests during grant season, SCN can conduct a limited number of assessments on a first-come, first-serve basis. For General Inquiries & Security Consultation, individuals may contact SCN by email (dutydesk@securecommunitynetwork.org) or by phone 844.SCN.DESK to be connected with SCN security experts. For Training Requests, individuals may inquire about trainings, or to schedule one for their community and/or facility, please contact our Training Desk via email at training@securecommunitynetwork.org.

The Investment Justification

An example of the FY 2019 IJ is attached. It is for illustrative purposes only (do NOT fill it out). The FY 2020 IJ may be different (I understand that FEMA may be considering modifications to make the IJ more user friendly).

In upcoming guidance, I will break down and review all the IJ components. For now, I am sharing the example, for the benefit of organizations who are undertaking a risk/vulnerability assessment in contemplation of applying for FY 2020. **They should make sure to provide a copy of it to their assessor, along with the above guidance for the assessor's understanding of what the assessment is for and how it will be used in the application.**

¹ SCN is a non-profit organization that serves as the official safety and security organization of the Jewish community in North America, working under the auspices of The Jewish Federations of North America and the Conference of Presidents of Major American Jewish Organizations.

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Nonprofit Security Grant Program (NSGP) Investment Justification Template Introduction

PAPERWORK BURDEN DISCLOSURE NOTICE

Public reporting burden for this form is estimated to average 84 hours per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and submitting the form. This collection of information is required to obtain or retain benefits. You are not required to respond to this collection of information unless a valid OMB control number is displayed in the upper right corner of this form. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing the burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 500 C Street, SW., Washington, DC 20472-3100, Paperwork Reduction Project (1660-0110) NOTE: Do not send your completed form to this address.

Security Warning:

When opening the IJ template, some users may see a note that says "Security Warning: some active content has been disabled." Click on the [Options ...] button next to the message, select "Enable this content," then click on the [OK] button. If this is not done, the text boxes may not function properly.

As part of the Nonprofit Security Grant Program (NSGP) application, eligible 501(c)(3) organizations must develop a formal Investment Justification (IJ) that addresses each initiative proposed for funding. These IJs must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities, as well as how the investment supports the building or sustaining of core capabilities within the National Preparedness Goal (the Goal). For more information on the Goal see: <http://www.fema.gov/national-preparedness-goal>. Additionally, the IJ must demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by the Federal Emergency Management Agency (FEMA). Applicants must ensure that the IJ is consistent with all applicable requirements outlined below. Each IJ must be for one facility/location.

FEMA has developed guidelines that establish the required IJ content and helps ensure that submissions are organized in a consistent manner while addressing key data requirements. This template (Office of Management and Budget [OMB] Number: 1660-0110/FEMA Form Number: 089-25) may be used by applicants to complete and submit their IJ. Failure to address these data elements in the prescribed format could potentially result in the rejection of the IJ from review consideration.

Applications must use the following file naming convention when submitting required documents for the NSGP-UA: "FY2019_NS GP_UA <State Abbreviation>_<Urban Area>_<Nonprofit Name>"; and NSGP-S: "FY2019_NS GP_S <State Abbreviation>_<Nonprofit Name>"

If using Excel 2007, applicants are required to save the final version of the IJ in the Excel 97-2003 format before submitting. Excel 2007 or PDF formats cannot be accepted. Instructions on saving the IJ template in the Excel 97-2003 format are below in the "Helpful Hints" Section.

Applications should be submitted by the nonprofit organization to the State Administrative Agency (SAA). Applicants should contact their respective SAA to get information on the application deadline and other SAA requirements. If an extension to the deadline is required, nonprofit organizations must consult with their respective SAA/UAWG. The NSGP Scoring Worksheet will be used by the SAA to review and score NSGP applications consistent with the guidelines provided in the NSGP IJ and Selection Criteria as well as ensure consistency with programmatic requirements. The NSGP Scoring Worksheet will be available on Grants.gov.

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Nonprofit Security Grant Program (NSGP) Investment Justification Template Introduction

Helpful Hints:

Moving through the Investment Justification:

While entering information in the IJ template, applicants should try to minimize the use of the Tab and Enter keys to move between data entry fields. As the template consists of a combination of text boxes and cells, using these keys may cause the cursor to move to an undesired location.

Copying & Pasting in the Investment Justification:

Some applicants may find it helpful to begin drafting their IJ information in MS Word and then pasting this into the Excel-based template. However, please be aware that, when copying and pasting information from Word into the text boxes in the template, any formatting will not carry over. Also, right-clicking in the text boxes in Excel will not provide the usual pop-up menu where you can select Cut, Copy, Paste, or any of the usual such options. To copy from a text box, users must select the text, then use the [Edit] menu in Excel 2003 or the [Home] tab in Excel 2007 and select [Copy]. To paste data into a text box, click in the text box, then use the [Edit] menu in Excel 2003 or the [Home] tab in Excel 2007 and select [Paste].

Character Count:

The data entry fields included in the IJ allow for the maximum number of characters noted for that section, plus an additional number of characters to account for spaces. Once that limit has been reached, users will not be able to include any additional text.

Spell Check:

When using Spell Check in MS Excel, it will not review information entered into the data entry boxes. Therefore, it is suggested that applicants use MS Word to ensure that the entered information is spelled correctly. To use Spell Check in MS Word:

In MS Word 2003

- a) Click on the [Tools] menu
- b) Select [Spelling] and all spelling issues will be displayed

In MS Word 2007

- a) Click on the [Review] tab near the top of the screen
- b) Click on [Spelling & Grammar] and all spelling issues will be displayed

Saving in Excel 2003 Format:

As stated above, if using Excel 2007 to complete the IJ template, applicants are required to save the final version in the Excel 97-2003 format before submitting. To do that:

- a) Click on the Office Button at the top left of the Excel window
- b) Hover over [Save As] in the list
- c) Click on [Excel 97-2003 Workbook]
- d) In the "Save As" Window, chose a location and file name for the new file. Be sure to use the file naming convection or format above.

To begin entering information into the IJ, click on the "Investment Justification" tab below.

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NSGP Investment Justification

I. Nonprofit Organization Applicant Information

Identify the Following:

Legal Name of the Organization

Physical Address of the Facility

(One Investment Justification per facility; include city, state, and zip code)

County

Year the Original Facility was Constructed

Organization Type (Short description of organization's ideology, beliefs and mission)

(400 character max- not including spaces)

Membership and community served

501(c)(3) Tax-exempt designation

Dun and Bradstreet Number

Applications can only be submitted with a current and valid DUNS number; pending DUNS numbers will not be accepted.

Urban Area Security Initiative - designated Urban Area (if applicable)

NSGP Federal Funding Request

NSGP Total Project Cost

Any Current Contract with DHS (yes/no)

This does not include any DHS or NSGP grant funds previously awarded to the nonprofit organization.

If Yes, please describe:

Investment Phase - New or Ongoing

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NSGP Investment Justification

II. Background (2 possible points out of 40)

Describe the nonprofit organization including: (500 character max per text box - not including spaces)

Describe the symbolic value of the site as a highly recognized national or historic institution or significant institution within the community that renders the site as a possible target of terrorism

Describe any previous or existing role in responding to or recovering from terrorist attacks

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NSGP Investment Justification

III. Risk (12 possible points out of 40)

DHS defines risk as the product of three principal variables: *Threat, Vulnerability, and Consequences*. In the space below, describe specific findings from previously conducted risk assessments, including A) Threats, B) Vulnerabilities, and C) Potential Consequences of an attack.

A) Threat: In considering threat, the applicant should discuss the identification and substantiation of specific threats or attacks against the nonprofit organization or closely related organization by a terrorist organization, network, or cell. The applicant should also discuss findings from a risk assessment, police findings, and/or insurance claims specific to the location being applied for including dates and specific threats.

[Empty response box for Threats]

B) Vulnerabilities: In considering vulnerabilities, the applicant should discuss the organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist attack.

[Empty response box for Vulnerabilities]

C) Potential Consequences: In considering potential consequences, the applicant should discuss potential negative effects on the organization's asset, system, and/or network if damaged, destroyed, or disrupted by a terrorist attack.

[Empty response box for Potential Consequences]

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NSGP Investment Justification

IV. Target Hardening (14 possible points out of 40)

In this section, describe each proposed activity or investment and the identified threat or vulnerability that it addresses as well as the associated cost with each activity or investment. Allowable costs are focused on target hardening activities as well as planning related costs, exercise related costs, contracted security personnel, and security-related training courses and programs limited to the protection of critical infrastructure key resources, including physical and cyber security, target hardening, and terrorism awareness/employee preparedness. Funding can also be used for the acquisition and installation of security equipment on real property (including buildings and improvements) owned or leased by the (2,200 character max - not including spaces)

In this section, list all target hardening equipment being proposed. Include the Authorized Equipment List (AEL) number and description, the vulnerability the equipment addresses, and the funding requested.

Allowable equipment is limited to two categories of items on the AEL:

- AEL Section 14 - Physical Security Enhancement Equipment
- AEL Section 15 - Inspection and Screening Systems

The equipment categories are listed on the web based AEL on the FEMA website, <https://www.fema.gov/authorized-equipment-list>.

AEL Number	Description of Item to be Purchased	Vulnerability to be Addressed	Funding Requested
Ex. 14SW-01-ALRM	Systems/Sensors, Alarm	Vulnerable entry	\$7,000
1.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>
2.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>
3.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>
4.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>
5.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>
6.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>
7.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>
8.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>
9.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>
10.	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>	<input style="width: 90%;" type="text"/>

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NSGP Investment Justification

V. Milestones (4 possible points out of 40)

Provide description and associated key activities that lead to the milestone event over the NSGP period of performance. Start dates should reflect the start of the associated key activities and end dates should reflect when the milestone event will occur. Milestones should reflect considerations to Environmental Planning and Historic Preservation reviews when applicable. (10 milestones maximum)

	Milestone	Start Date	Completion Date
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

VI. Project Management (3 possible points out of 40)

Who will manage the project:

Include the name, phone number, and/or email address, and experience of the project manager(s)

Describe the project management, including:

- Description of any challenges to the effective implementation of this project
 - Coordination of the project with State and local homeland security partners
- (2,200 character max - not including spaces)

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NSGP Investment Justification

VII. Impact (5 possible points out of 40)

What measurable outputs and outcomes will indicate that this investment is successful at the end of the period of performance?
(2,200 character max - not including spaces)

Which specific National Preparedness Goal (the Goal) core capabilities does this investment work to achieve? Explain how this investment supports the building or sustaining of these Goal core capabilities. For more information on the Goal see: <http://www.fema.gov/national-preparedness-goal>.

Funding History

If the nonprofit organization has received NSGP funding in the past, provide the funding source, funding amount, funding year, and the investment type. If the nonprofit organization has not received NSGP funding in the past, select no and skip to the next section.

NSGP Funding in the Past (yes/no)

Year(s) NSGP Funding Received

Funding Amount

Investment Type

	▼
	▼

Additional Information

Applicant Contact Information

I certify that I am an employee of the aforementioned nonprofit organization or have been hired by the nonprofit organization to apply on their behalf for the NSGP.

Name and e-mail address or phone number