



Nonprofit Security Grant Program: NOFO Summary on Key Points

March 5, 2021, 2021

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The Federal Emergency Management Agency announced the start of the FY 2021 Nonprofit Security Grant Program on February 25th. At this point, most communities have 3 to 5 weeks to complete and submit their applications. The following overview highlights a few changes to FEMA's Notice of Funding Opportunity and Preparedness Grants Manual, as well as items that FEMA has underscored this year.

I. Program Priorities

FEMA's stated priorities of the program are important to remember as you develop your proposals.

There are three stated priorities this year in the guidance worth noting:

- First, the NSGP seeks to integrate the preparedness activities of nonprofit organizations with broader state and local preparedness efforts. This goal is addressed in the Project Management Section of the IJ (Part VI.).
- Second, for FY 2021, the area that still attracts the most attention is enhancing the protection of soft targets. In other words, physical security enhancements remain the priority.
- Third, the sub-applicant needs to demonstrate, through the application, that the organization is at high risk of a terrorist attack. This should be the common narrative thread throughout the application.

II. Award Caps

This year, sub-applicants with one location may apply for up to **\$150,000** for their physical address. This is a \$50 thousand increase over last year.

Also, new this year, sub-applicants with multiple locations may apply for up to \$150,000 per physical address, for up to three locations, for a maximum of **\$450,000** per sub-applicant. If a sub-applicant applies for multiple locations, they will be required to submit a complete IJ for each location and a separate vulnerability/risk assessment for each location, as well.

Note: For the NSGP-State program, the SAA may still determine an award cap for individual subawards that are below FEMA's listed amounts, in their discretion.

III. Allowable Costs

Equipment

There are two new allowable equipment costs outside of the NSGP-approved AEL Categories 14 and 15, which include:

- Handheld/portable radios (AEL 06CP-01-PORT - Radio, Portable)
- Public warning/address systems (03OE-03-MEGA - System, Public Address, Handheld or Mobile)

Each SAA will determine how broad these two new categories will be implemented.

Contracted Security Personnel

Contracted security personnel remains an allowable cost.

As with last year, application for this cost must include a written plan that explains sustainment of contracted security personnel beyond the 36-month period of performance.

- Some SAAs may request this plan at the beginning of the application phase, while others may require it at the close out of project implementation.

Additionally, this year, application for this cost must include a breakdown in the narrative section of Part IV of the IJ, the number of personnel, frequency of use, and hourly rate that justifies the funding level requested.

Cybersecurity

The NSGP program continues to focus on conventional physical security (soft targets/crowded places) and not cyber.

Consequently, projects associated with cybersecurity will be less attractive in a competitive process than more traditional physical security projects. As such, cyber costs under NSGP remain limited to one approved AEL category, regarding the acquisition and installation of backup computer hardware, operating systems, data storage, and application software (14CI-00-COOP).

Target Hardening

This year, FEMA underscores that all proposed purchases (including projects and activities) should be thoroughly detailed, costs justified, and linked to the vulnerability/risk assessment in the narrative portion of the Target Hardening section (Part IV of the IJ).

- This includes equipment and proposed contracted security personnel, planning, training, and exercise costs. Two examples by way of illustration:
 - Fencing: 240 feet of 8-foot chain-length fencing topped with 1 foot of barbed wire, to address vulnerability to breaching along the west side of the facility – equates to 240 feet x \$208.33 per foot, totaling \$50,000
 - Cameras: 8 exterior cameras, 3 located on lighting poles in the parking lot, 1 adjacent to the main entrance to the facility, and 1 on each corner of the building (4 corners), to address inability to monitor the exterior of our facility and identify suspicious activity – equates to 8 cameras x \$625, totaling \$5,0000

Additionally, Part IV includes a section where sub-applicants must also list all physical security equipment that is proposed for purchase in the narrative portion.

- This includes the correct AEL number(s) and title(s) of all proposed equipment purchases, the vulnerability in Section III it addresses, and the total amount requested per item.

Note: Total funds requested must match in both the narrative and budget portions of Section IV, along with the total federal funding requested in Section I.

IV. Unallowable Costs

Generally speaking, pre-award costs are not eligible for reimbursement under the NSGP program. This year, FEMA also makes clear that unallowable costs include:

- **License Plate Reader (LPR) Systems and Facial recognition software.** FEMA deems that there are ready alternatives to nonprofits for access controls.

Note: Several states prohibit their use or prevent their use without probable cause or a search warrant. There are also privacy and ethical concerns in empowering nonprofits for what is considered a law enforcement function.

Other examples of unallowable costs include:

- Knox Boxes
- Guns/Weapons
- Landscaping
- Weapons Training

V. Vendors

To eliminate unfair competitive advantage, during the application process, vendors should be treated at arms-length. Their purpose should be limited to providing requested cost estimates, preferably with the details necessary for the sub-applicant to complete the Investment Justification.

- Any vendors, consultants, or contractors who assist sub-applicants develop grant applications, project plans, or project budgets -- including the development of statements of work, invitations for bids, or requests for proposals -- are prohibited from competing for such procurements during the post-award period.

VI. Scoring (and connection to Organization Type and Mission)

All sub-applicants are not alike when it comes to grant scoring.

In Part I of the application, sub-applicants are required to self-identify with one of four categories in the Investment Justification as part of the application process, including:

- Ideology-based/Spiritual/Religious orgs
- Educational orgs
- Medical orgs
- Other

They are also required to submit a **Mission Statement**, which is used to validate information in the IJ, such as the sub-applicant's self-identified organizational type. Specifically, the Mission Statement:

- Should be on official letterhead, if available
- Should provide the "Who, What, and Why" of the organization
- Should state the intent and purpose of the organization and any mission implementing policies or practices that may elevate its risk

Note: There is otherwise no official format to the Mission Statement.

These details will impact the final scoring process. After the SAAs and FEMA score the sub-applications, FEMA will then apply a multiplier between 1 and 3 to determine the final score for each sub-application:

- A factor of three will be applied for nonprofit groups that are at a high risk of terrorist attack due to their ideology, beliefs, or mission
- A factor of two will be applied for medical or educational institutions and
- A factor of one will be applied for all other nonprofit organizations

VII. Post Award Considerations

All sub-grant awardees will be required to satisfy an Environmental and Historic Preservation review, develop a project implementation plan, submit scheduled progress reports, complete reimbursement requests, complete program closeout paperwork, and of course manage project implementation.

- This year, JFNA is working with FEMA on developing a post-award webinar that will cover key grant administration requirements, which we would conduct sometime in early fall, after awards are announced.

Other post-award considerations to remember:

- Any post-award scope of work or budget changes will require prior approval from FEMA and may be denied without compelling justification given the competitive nature of the program.
- Nonprofits selected for awards that subsequently seek to renovate their facilities so as to affect the vulnerability/risk assessment upon which their applications were based will not be approved for a scope of work change.
- Also, investments once installed in a physical structure may not be relocated by the sub-applicant if they subsequently move – the improvements must stay with the structure for which they were approved.

Note: All this is to say, be careful in the development of your projects, so as to avoid problematic post award change requests, and do not plan to apply at this time, if you know or are seriously contemplating construction, renovation, or relocation during a project's 36-month period of performance.