FAQs
FY 2021 Webinar: Navigating the DHS Nonprofit Security Grant Program (NSGP)
March 3, 2021

Q: When is the FY 2021 Application due?
A: The State Administrative Agency (SAA) will set the due date for receipt of sub-applications from nonprofits located in their state or jurisdiction. It will be in the SAA's posted application instructions. The SAAs are responsible for administering the program in their respective states and it is up the nonprofits to contact their SAA or visit their website to request or locate their instructions. The following is a link to FEMA's SAA contact list: https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts. **Sub-applicants only apply through their SAA.**

Q: Where can I find word counts or other length limits for the portions of the IJ?
A: The Investment Justification consists of 7 parts (6 pages, with several space limitations). Parts II, VI, and VII have specific character limitations. In general, the IJ is not a dense document and efficiency and brevity of responses is recommended. There is no need to use up every character space or fill up sections with text. What is important is to provide the information requested in the correct places and to be clear and succinct.

Q: Are there differences between the 2020 solicitation and the 2021 solicitation?
A: JFNA has prepared two documents that highlight key modifications to the FY 2021 Notice of Funding Opportunity and Preparedness Grants Manual that are pertinent to the sub-applicants. You may request copies of those from Rob.Goldberg@JFNA.org. FEMA has also posted explanatory materials for the State Administrative Agencies, which may be found at: https://www.fema.gov/media-collection/nonprofit-security-grant-program-notices-funding-opportunity.

Q: There is some differences in the various documents on due date for our submission (I saw a March 18 and a May 14). What is the correct due date?
A: FEMA's Notice of Funding Opportunity sets forth Key Dates for the State Administrative Agencies. The SAAs will set forth Key Dates for the nonprofits (sub-applicants) located in their state of jurisdiction. Nonprofits should NOT delay in contacting their SAAs or visiting their websites to ascertain relevant Key Dates. For most states, the deadlines to submit applications are only two to five weeks from now. The following is a link to FEMA's SAA contact list and web-links: https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts.

Q: Could you please explain the requirements for an audit of the organization?
A: **Actions to Address Noncompliance:** Non-federal entities receiving financial assistance from FEMA are required to comply with requirements in the terms and conditions of their awards, the Notice of Funding Opportunity and Preparedness Grants Manual, throughout the award lifecycle or even after an award has been closed. Common areas of noncompliance for the preparedness grant programs include:

- Insufficient documentation and lack of record retention.
- Failure to follow the procurement under grants requirements.
- Failure to submit closeout documents in a timely manner.

- Failure to follow Environment and Historic Preservation requirements.
- Failure to comply with the Period of Performance deadline.

Audits: While rare for the NSGP program, all FEMA grant recipients are subject to audit oversight. Subgrantees must retain award documents for at least three years. It is recommended that sub-recipients apply/conform to their regular internal controls, record keeping and accounting practices in carrying out their NSGP project and in accordance with the conditions set forth in their awards package. For more information, a copy of FEMA's Preparedness Grants Manual may be accessed at: https://www.fema.gov/sites/default/files/documents/FEMA_2021-Preparedness-Grants-Manual_02-19-2021.pdf.

Q: Are there any resources for grant writing assistance or project management?
A:
- Both The Jewish Federations of North America and the Secure Community Network provide written and recorded grant writing guidance and maintain support desks.
  - To access JFNA's technical assistance, contact: Rob.Goldberg@JFNA.org.
  - To access SCN's technical assistance, dutydesk@securecommunitynetwork.org.
- For communities with professional Jewish communal security directors, you may seek grant guidance/assistance from them. For details, go to: https://www.live-secure.org/local-security.html.
- For communities without Security Directors, there may be some grant writing support available through the local Federation. For details, contact: justin.shechtel@jewishfederations.org.

Q: As the NOFO has been issued nationally, when will my state's program launch?
A: The SAAs are responsible for administering the program (including establishing deadlines and opening the program) in their respective states. It is up the nonprofits to contact their SAA or visit their website to request or locate their instructions. The following is a link to FEMA's SAA contact list: https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts.

Q: Can you provide the web link to Live Secure?
A: https://www.live-secure.org/.

Q: Explain how sub-applicants are eligible to apply for multiple locations?
A: 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, at their discretion.

[Per FEMA, each submission must have a physical address - no P.O. Box Numbers, only one site and one address per Investment Justification, and must be for a location the organization occupies at the time of application.]

Q: What is a Sub-applicant?
A: To be clear, the State Administrative Agency is the applicant, and the nonprofits are the sub-applicants. When FEMA released its Notice of Funding Opportunity for the NSGP program, they released it to the State's designated homeland security/emergency management agencies (referred to in the

NOFO as the State Administrative Agency or SAA). The SAAs are responsible for applying for the grants on behalf of the nonprofit sub-applicants. The sub-applicants are to look to their SAAs for all official guidance, instructions and application materials required of FEMA and the state. They are the sub-applicant's point of contact. In nearly all circumstances, there would be no reason for a nonprofit to engage FEMA directly. The following is a link to FEMA's SAA contact list and web-links: https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts.

Q: Can states lower the Federal cap amount?

A: For the NSGP-State program, the SAA may establish an award cap for individual subawards that are below FEMA's listed amounts, at their discretion.

Q: What are the requirements for Contracted Security Personnel?
A: 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, to include the number of personnel, frequency of use, and hourly rate that justifies the funding level requested. As in the past, if the requested cost/budget for Contracted Security Personnel is expected to exceed 50% of the total project cost, then the sub-applicant will need to seek a waiver through their SAA to FEMA for approval. The period of performance for this cost is up to 36 months.

Restrictions: the funding may not be used to underwrite existing security contracts (may be able to add to current contracted security personnel if substantiated in the vulnerability/risk assessment) and may not be used to purchase equipment for contracted security personnel.

Q: We did not receive funding last year. Is it possible to get feedback on why that decision was made?
A: There are several factors that influence award decisions that make it difficult to provide feedback to a particular applicant, including quantity of applicants (limited resources), quality of the application (competency and impact of the IJ), static factors (rankings of applicants from higher risk to less risk), risk ranking by state (based on risk analysis formula), and related national intelligence analysis (immediate security concerns facing the nation). Consequently, it is not generally feasible to assess a particular applicant's deficiencies. Some SAAs may be able to provide some details about the State's review of a past sub-application upon request (but not likely in the midst of the open period for the FY 2021 grant opportunity).

Q: Do you have samples of successful grant applications you can share?
A: The review process is diffuse and is influenced by both state and local assessments involving multiple factors and thousands of reviewers. Furthermore, each applicant is required to develop their application based on very individualized circumstances. It is, therefore, difficult to provide a "sample application." Rather, we have developed detailed written guidance to assist applicants with completing each section of the application. It is advisable to carefully review the guidance when thinking about and drafting responses. To receive this guidance contact Rob Goldberg at: Rob.Goldberg@jewishfederations.org.

Q: What is the scope or interpretation of FEMA's prohibition on the acquisition and installation of facial recognition systems?

A: This prohibition stems in part from several states prohibiting or preventing 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. FEMA deems that there are ready alternatives to nonprofits for access controls. For questions of interpretation of this prohibition, sub-applicants should consult their SAAs.

Q: How do you incorporate the cost of Security personnel into the grant?
A: 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.

Q: Does an intercom system qualify as an allowable cost? Would phone systems be allowed?
A: 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.

Q: Is anyone going to address registering and submissions to grants.gov and ndgrants.gov?
A: Sub-applicants do NOT register onGrants.gov. The SAAs are responsible for applying for the grants on behalf of the nonprofit sub-applicants. The sub-applicants are to look to their SAAs for all official guidance, instructions, and application materials required of FEMA and the state. They are the sub-applicant's point of contact. In nearly all circumstances, there would be no reason for a nonprofit to engage FEMA directly. The following is a link to FEMA's SAA contact list and web-links: https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts.

Q: Does allowable equipment cost include installation labor, e.g., surveillance cameras and monitor screens install labor?
A: Yes, the grant covers the "acquisition and installation" of security equipment.

Authorized equipment under NSGP are primarily limited to Categories 14 and 15 of FEMA's Approved Equipment List, which may be found at: https://www.fema.gov/grants/guidance-tools/authorized-equipment-list. Examples of eligible equipment include:

- Access control equipment
- Surveillance equipment (cameras)
- Impact resistant doors and gates
- Intrusion detection sensors and alarms
- Exterior lighting
- Physical perimeter security (fencing, walls, jersey barriers)
- Screening and inspection equipment
- Backup computer hardware, operating system, data storage, and application software

Q: Are there additional requirements for projects that will involve construction/renovation requests?

A: NSGP funding may not be used for construction and renovation projects without prior written approval from DHS/FEMA. All recipients of NSGP funds must request and receive prior approval from DHS/FEMA before any NSGP funds are used for any construction or renovation. The total cost of any construction or renovation paid for using NSGP funds may not exceed 15% of the NSGP award. Given DHS/FEMA's approval, the State Administrative Agency would have to be engaged at the onset to facilitate. Additional considerations:

- 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.

Q: How are investments to be listed in the Investment Justification?
A: The relevant section of the IJ is Part IV, Target Hardening, which consists of two parts – a narrative section and an equipment categories section. As described below, every investment requested must be described in the narrative section (including equipment). Additionally, all equipment must be stated again in the equipment section.

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:
  o 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
  o 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.

Q: Can the application include the replacement of exterior doors to enhance protection of the building?
A: All requested investments should be identified and prioritized in the vulnerability/risk assessment. Impact resistant doors and gates are among permissible costs.

Q: We are renovating a synagogue building and security upgrades are part of the plan. Are we eligible to apply for these costs? (The upgrades will be installed this year and will remain in place for at least 3 years.)
A: No. Pre-award costs are ineligible. No pre-award costs can be reimbursed. Note: grant awards will not be announced until the fall, and work on the project may not be allowed to commence until several months after that. All sub-grant awardees will be required to satisfy a number of pre-requisites, including satisfying an Environmental and Historic Preservation review and develop an approved project implementation plan before the project can start.

Q: We are a synagogue with a driveway and parking lot. Our local police advised us to install cameras at the entrance to our driveway to record license plates of all vehicles entering our driveway. Would such hardware not be allowed for grant consideration?
A: FEMA prohibits funding for License Plate Reader (LPR) Systems. They are not considered appropriate investments for nonprofit institutions to enhance their physical security, which is the objective of the program. There is no prohibition on using non-federal funds for such investments.

Q: Can you give some examples of what would constitute "high-risk" for these applications?
A: When completing the Threat section of the IJ (Part III. Risk) and generally making the "risk" case:

- First Choice: Describe specific terror (or violent homegrown extremist) incidents, threats, hate crimes, and/or related vandalism, trespass, intimidation, or destruction of property that have targeted its property, membership, or personnel. This may also include a specific event or circumstance that impacted an affiliate or member of the organization's system or network.
- Second Choice: Report on known incidents/threats that have occurred in the community and/or state where the organization is located.
- Third Choice: Reference the public record regarding incidents/threats against similar or like institutions at home or abroad.

Since there is limited working space in the IJ, the sub-applicant should be selective in choosing appropriate examples to incorporate into the response: events that are most recent, geographically proximate, and closely related to their type or circumstance of their organization or are of such magnitude or breadth that they create a significant existential threat to the Jewish community at large. To request an up-to-date compilation of recent threat incidents, at home or abroad, targeting Jews and Jewish institutions that have been reported in the public record, contact: Rob.Goldberg@JFNA.org

Q: How best to draft and save responses to the Investment Justification?
A: There are no guidance restrictions on what platform an applicant uses to apply. However, as the application is a Microsoft Excel product, there have been errors with Excel for Mac programs. We, therefore, recommend that applicants consider using alternatives to Apple computers that are more conducive to Microsoft operating systems. Additionally, the platform can be unstable. We recommend drafting responses in Word and copying and pasting answers into the IJ when ready. We also recommend only using the most recent version of the IJ provided by the SAA, as there may have been software updates to the FY 2021 version.

Q: Does it matter when we send in the application? Is there any merit to sending it in earlier vs later?
A: There is no advantage to submitting the application early. However, application submitted after the SAA's stated deadline will be disqualified. We advise that sub-applicants be prepared to submit

applications no later than 24-hours before the stated deadline. If there are technical difficulties, the sub-applicant must notify the State Administrative Agency prior to the application deadline.

Q: Are Bi-Directional Amplifiers (BDA), as part of the National Fire Protection Association (NFPA) national compliance mandate for identified sites that are problematic for first responder 2-way radio transmissions, included in the communications allowance as part of the 2021 NSGP? (Due to the fact that first responder communication as part of response to terror act being critical)

A: Newly allowable equipment includes handheld/portable radios (AEL 06CP-01-PORT - Radio, Portable). This section includes equipment and systems that provide connectivity and electrical interoperability between local and interagency organizations to coordinate CBRNE response operations. When utilizing FEMA program funds in the category of Interoperable Communications Equipment to build, upgrade, enhance, or replace communications systems, grantees and sub-grantees should develop a comprehensive interoperable communications plan before procurement decisions are made. Check the AEL or with the SAA about standards and options.

Q: Can you provide information on where we get details to submit the Maryland application?
A: There are two eligible Urban Areas in Maryland: the Baltimore Area (consists of Annapolis and Baltimore cities, and Anne Arundel, Baltimore, Carroll, Harford, and Howard counties), and the National Capital Region Area (covers the District of Columbia, Montgomery, and Prince George's Counties).

- The point of contact for the Baltimore Area is Janet Moncrieffe at: janet.moncrieffe@maryland.gov or (410) 517-3622 (O) or (443) 324-7517 (M).

    For the Baltimore Area, Keith Tiedemann is the Security Director at Baltimore Jewish Council, and can be reached at: ktiedemann@associated.org.

- The point of contact for the National Capital Region is Cembrye Ross at: cembrye.ross@dc.gov. or Desk: (202) 481-3190 (O) or (202) 603-5710 (M).

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    For the National Capital Region Area, Robert Graves is the SCN Regional Security Advisor for the Jewish Federation of Greater Washington, and can be reached at: robert.graves@shalomdc.org or (202) 841-6302 (M).

Q: Does a synagogue answer yes to 501(c)3 even though technically they are not?
A: All houses of worship and other faith- and community-based 501(C)(3) organizations are eligible to apply. 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. In the Investment Justification (application), they would leave the EIN number question blank, and would explain their status in response to the Investment Justification question to describe "Organization Type." Note: Some State Administrative Agencies may require exempt organizations in their jurisdictions to submit an affidavit or other written statement affirming the applicant's tax-exempt status.

Q: What is UASI?
A: UASI, or Urban Area Security Initiative, is one of several FEMA preparedness grant programs. The NSGP-Urban Area program is eligible to the same 31 eligible urban areas that are eligible to participate in the UASI program, as follows:

Arizona: Phoenix Area
California: Anaheim/Santa Ana Area
California: Bay Area
California: Los Angeles/Long Beach Area
California: Riverside Area
California: Sacramento Area
California: San Diego Area
Colorado: Denver Area
District of Columbia: National Capital Region
Florida: Miami/Fort Lauderdale Area
Florida: Orlando Area
Florida: Tampa Area
Georgia: Atlanta Area
Hawaii: Honolulu Area
Illinois: Chicago Area
Maryland: Baltimore Area

Massachusetts: Boston Area
Michigan: Detroit Area
Minnesota: Twin Cities Area
Missouri: St. Louis Area
Nevada: Las Vegas Area
New Jersey: Jersey City/Newark Area
New York: New York City Area
North Carolina: Charlotte Area
Oregon: Portland Area
Pennsylvania: Philadelphia Area
Texas: Dallas/Fort Worth/Arlington Area
Texas: Houston Area
Texas: San Antonio Area
Virginia: Hampton Roads Area
Washington: Seattle Area

Q: Will FEMA be awarding bonus points to organizations that have never received NSGP funding?
A: Yes. Due to the competitive nature of the NSGP program (more applications than available funds), FEMA has historically applied between 1 – 10 bonus points to the overall IJ score of sub-applicants who have not received a prior grant award. In FY 2021, 5 bonus points will be applied. All sub-applicants must set forth their NSGP funding history in the Funding History section of the IJ.

Q: FEMA and the SAAs set funding caps. Are there also funding minimums?
A: FEMA establishes the maximum funding award. The State Administrative Agencies may choose to lower the cap in their discretion. Sub-applicants need to follow the guidance established by their respective SAA, including on spending limitations. There is no minimum request. It is advisable that sub-applicants apply for what they need as established, and in the order prioritized, by their vulnerability/risk assessments. Only allowable investments that are included in the assessment will be considered for funding and those investments not established as priorities within the assessment will be scrutinized by assessors relative to their efficacy.

Q: Can we use a Risk Assessment that was completed a couple of years ago? How old is too old for a Risk Assessment?
A: For an assessment that occurred 36 months or longer, a best practice would be to update the assessment. Risks and vulnerabilities may have changed in the timeframe, which could impact recommended investments to address them. And if you are seeking investments that are not justified within the vulnerability/risk assessment, an update to the existing assessment might be warranted to address additional categories of investments.

Q: What if you are building an addition that you want to fund security equipment for - so there is no security assessment on the "existing building"?
A: Only the physical structure at the time of application would be eligible for security enhancements. All allowable investments will be based on a vulnerability/risk assessment of the existing physical structure.

Q: If we were previously awarded a grant for certain security enhancements and are going to continue the same project with additional enhancements, can we use the previous application as a template and update it for the additions?

A: A new IJ is required. It is up to the sub-applicant to develop its IJ proposal. Make sure the vulnerability/risk assessment is current (no older than 36 months), and that whatever is being requested is allowable and support by the assessment. As the NSGP is a competitive program, be wary of cutting corners. Each IJ will be judged on its merits – on the quality and completeness of all responses.

Q: How do I get a risk assessment performed quickly?

A: Contact SCN at: nsgpsupport@securecommunitynetwork.org for immediate assistance.
Generally speaking, there are basically three approaches to obtaining a vulnerability/risk assessment. Through:

- A professional assessment conducted by a Federation or Secure Community Network community or regional security director, a Department of Homeland Security Protective Security Advisor, or a state or local law enforcement partner may be provided at no or minimal cost.
- A private vendor, whose cost would not be reimbursable through the grant. Private sector venders may vary in cost, quality, and competency, so it would be advisable to vet/conduct due diligence on all prospective candidates and confer with SCN's Duty Desk if there are questions or concerns: dutydesk@securecommunitynetwork.org.
- A self-assessment, at no cost. Two preferred self-assessment tools include:
    - SCN Self-Assessment Tool: https://securecommunitynetwork.org/resources/dhs-grant-funds-information/nsgp-tvra-tool
    - DHS Self-Assessment Tool: https://www.cisa.gov/houses-of-worship

Q: How does one download the application materials?

A: The SAAs are responsible for administering the program in their respective states and it is up to the nonprofits to contact their SAA or visit their website to request or locate their instructions. The following is a link to FEMA's SAA contact list: https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts.

Q: Does an applicant have to own the space for which it is applying to secure?

A: The physical address for the grant may be rented or owned by the sub-applicant. Tenants should make sure that if required, landlord consent or approval is provided.

Q: If an organization received a grant under this program last year, how likely is it that they would receive another grant this year?

A: There is no way to predict. There are several factors that influence award decisions, including the quantity of applicants (limited resources), quality of the application (competency and impact of the IJ), static factors (rankings of applicants from higher risk to less risk), risk ranking by state (based on risk analysis formula), and related national intelligence analysis (immediate security concerns facing the nation). For an applicant with a history of an award, they will not receive the 5-point bonus provided. This year, we have secured substantially increased funding for the program which may minimize the bonus impact and allow for more grants to be approved.

Q: What are the training opportunities?

A: Training and Exercises are limited to an organization's security personnel, staff, members, and volunteers. Offsite or onsite security training is allowed. Train-the trainer courses are allowed.

Allowable training-related costs are limited to attendance fees and related expenses, such as materials, supplies, and/or equipment. Travel is not a reimbursable cost.

Allowable training/exercise topics include physical security and cybersecurity, target hardening and terrorism awareness, and employee preparedness topics, such as Community Emergency Response Team (CERT) training, active shooter training, and emergency first aid training. Applications should include specific details about any proposed training/exercises, to include topic, organizational attendees/participants, length, and what vulnerability the activity will help mitigate.

Training and Exercises should be supported in the vulnerability/risk assessment and set forth and budgeted in the narrative section of Part IV, Target Harding. SCN can assist with identifying training offerings. Contact training@securecommunitynetwork.org for more information.

Q: **How does one account for inflation or cost increases between a bid now and final bid in October?**
A: Sub-applicants are submitting cost estimates. If a sub-applicant has concerns about the potential for significant fluctuation of costs, it should be stated in the second section of Part VI, Project Management, where potential challenges to the effective implementation of the project should be described. Additionally, bidding for project investments should be identified in Part V, Milestones.

Q: Our synagogue owns 2 cemeteries, how do we handle those, all in one or separate applications?
A: A sub-applicant with one site may apply for up to $150,000 for that site. A sub-applicant with multiple sites may apply for up to $150,000 per site, for up to three sites, for a maximum of $450,000 per sub-applicant. For multiple applications, each site requires its own vulnerability/risk assessment and all other required submission requirements must also be duplicated.

Q: What are the vendor limitations with respect to pre-award assistance?
A: To eliminate unfair competitive advantage during the application process vendors 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.

Q: Should we enter the items we have completed as we finish them or wait and do the whole application at one time?
A: TO BE CLEAR, no pre-award costs or expenditures would be eligible for NSGP approval. Only eligible costs incurred after the project is officially commenced can be reimbursed. No pre-award costs or costs incurred prior to permission to commence the project will be eligible for reimbursement.

Q: Is a Duns # required?
A: Dun & Bradstreet Number: This is requisite of all sub-applicants. To register or search for an existing DUNS Number, go to: http://fedgov.dnb.com/webform/displayHomePage.do. The process is free and simple.

Q: If we rent our facility, does the landlord need to be the one to file for the grant versus our synagogue?

A: No. The physical address for the grant may be rented or owned by the sub-applicant. Tenants should make sure that, if required, landlord consent or approval is provided.

Q: Last year we applied but never received a reply, is that normal?
A: All SAAs notify successful sub-grant awardees. Not all SAAs notify unsuccessful applicants. If you have questions about the status of an FY 2020 grant, contact Rob Goldberg at: Rob.Goldberg@JFNA.org.

Q: Can a project manager be from our organization or must this person be professional from outside?

A: Commonly, project management is conducted by committed and responsible personnel or lay volunteers of the sub-applicant. In Part VI, Project Management, the sub-applicant will provide management details, such as the complete contact information for the project manager and a description of their relevant experience. To the degree known and applicable, a sub-applicant should also identify other persons who will be enlisted to advise, coordinate, or help carry out the project, their expected roles, responsibilities, and relevant experience. Note: Where there are vacant positions or unknowns that are expected to be filled, include each position to be filled and the expected roles, responsibilities, and qualifications for each position.

Q: How many sub-applicants do you anticipate will apply?
A: In FY 2019 and FY 2020, approximately 2,000 sub-applications were deemed eligible and submitted by the SAAs to FEMA. In FY 2019, about one-third of the submissions were funded for a total of $60 million in awards. In FY 2020 about 50% of the submissions were funded for a total of $90 million in awards. For FY 2021, up to $190 million is available to award. The expectation is that there will be more demand this year with an increased number of sub-applicants. However, the numbers could be suppressed in the midst of the pandemic.

Q: When and where can we find guidance to address the Core Capabilities question in the IJ Part VII, Impact?
A: In Part VII, sub-applicants are required to address two narrative sections:

- In the first, the sub-applicants must describe how the projects proposed in the IJ will mitigate known threats and vulnerabilities. Explain how in practice the allocation of resources – the target hardening investments (set forth in Part IV) acquired through the grant – most efficiently and effectively reduce the risks and vulnerabilities identified in the Risk sections (Part III) of the application and thus protect against the potential consequences of a potential terrorist attack.

- In the second, the sub-applicant must identify the core capabilities the proposed projects and activities in their IJ will help to address. This question will help DHS/FEMA assess the contributions the sub-applicant will make to national preparedness through the application of DHS/FEMA developed Core Capabilities descriptors (critical mission areas). In this section, sub-applicants should explain how the Investment/s they are requesting support building or sustaining one or more DHS/FEMA designated Core Capabilities through the grant. Core capabilities might be considered the intended security outcomes or achievements of the project, resulting from the investments made to address the threats and vulnerabilities assessed. Additionally, as national preparedness is considered interdependent, requiring a "Whole Community" approach, it would be advisable to address how the outcomes and achievements (Core Capabilities) brought about through the grant might contribute to the greater resiliency and preparedness of the Whole Community.

The Core Capabilities are listed here: https://www.fema.gov/emergency-managers/national-preparedness/mission-core-capabilities.

SCN has prepared a resource to assist with identifying the Core Capabilities addressed by the proposed investment(s), which may be accessed here:

Q: Would it help or hurt the application if we contacted our state representative(s)?
A: The NSGP is a competitive program that is not influenced by elected official involvement.
Q: As part of "planning security procedures" can we request funds for a new risk assessment of our site?
A: No. Unallowable costs include any pre-award costs, as well as the development of risk/vulnerability assessment models.

Q: Are cemeteries eligible for funding to prevent vandalism?
A: Yes. All places of worship and other faith- and community-based 501(C)(3) organizations are eligible to apply.

Q: What do we do if the SAA is just releasing its site and the deadline says February 24, 2021?
A: Contact the SAA for specific instructions. A few SAAs may have established deadlines preceding the release of FEMA's Notice of Funding Opportunity.

Q: Related to multiple buildings, what about agencies that are on larger agency campus, such as a Federation campus?
A: Tenants may apply individually for their occupied spaces.

Q: Any problem submitting two risk/vulnerability assessments with the IJ? Each was done by a security professional.
A: The SAA is looking for a clear, succinct, and organized application. They do not want extraneous materials. If the two IJs would create confusion, would be redundant or conflict with one another, then it would not be advisable. If deemed necessary or appropriate to submit two, make sure your reasoning is clearly explained.

Q: Are vulnerability assessments expected in a particular format?
A: SAAs prefer professional assessments, where possible. If time (or cost) is a concern, self-assessments are allowable under FEMA guidance.

There are basically three approaches to obtaining a vulnerability/risk assessment:

- A professional assessment conducted by a Federation or Secure Community Network community or regional security director, a Department of Homeland Security Protective Security Advisor, or a state or local law enforcement partner may be provided at no or minimal cost.
- A private vendor, whose cost would not be reimbursable through the grant. Private sector vendors may vary in cost, quality, and competency, so it would be advisable to vet/conduct due diligence on all prospective candidates and confer with SCN's Duty Desk if there are questions or concerns at: dutydesk@securecommunitynetwork.org.
- A self-assessment, at no cost. Two preferred self-assessment tools include:

- SCN Self-Assessment Tool: https://securecommunitynetwork.org/resources/dhs-grant-funds-information/nsgp-tvra-tool
- DHS Self-Assessment Tool: https://www.cisa.gov/houses-of-worship

Q: Should the mission statement be in a separate letter, or can it be just included in the application?
A: The Mission Statement should be a stand-alone document submitted with the Investment Justification. The Mission Statement 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: Otherwise, there is no official format to the Mission Statement.

Q: With character limits in a number of sections, what guidance can you provide?
A: There are 7 Parts to the IJ. Some, but not all, 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 the quality and completeness of all responses will 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.

Generally speaking, reviewers are interested in clear, concise, well-thought out responses. They will not be persuaded or influenced by dramatic, verbose writing styles. Give them the facts in a straightforward manner.

Q: Are there specific percentages of funding that must be used for target hardening, training, exercises, etc.? Similar to how security personnel are limited to 50%?
A: There are no specific percentages for funding. However, the investment that still attracts the most attention is enhancing the protection of soft targets. In other words, physical security enhancements remain the priority. With respect to limitations of security personnel costs, this limitation is required under the Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008 (PRICE Act) (Pub. L. No. 110-412). **However, FEMA, at the request of the sub-applicant through their SAA, will approve personnel waiver requests that are well justified based on vulnerability assessment results and how the contracted security personnel will address and mitigate those vulnerabilities.**

Q: How are the sub-applications scored?
A: Generally speaking, the State Administrative Agencies (SAAs) administer the program locally, score and prioritize sub-applications, and submit the applications for federal review on behalf of the sub-applicant nonprofit organizations. The Federal Emergency Management Agency (FEMA) administers the program nationally, reviews and further assesses (based on national threat considerations) the submissions, and makes funding recommendations to the Secretary of Homeland Security. The Secretary of Homeland Security makes the final award determinations.

Q: Is there a maximum percentage of our total request that can be for cybersecurity investments?

A: There are no specific percentages for funding. However, the investment that still attracts the most attention is enhancing the protection of soft targets. In other words, physical security enhancements remain the priority. Consequently, projects associated with cybersecurity will be less attractive in a competitive process than more traditional physical security projects. 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).

Q: If we want to ask for more than 50% for contracted security personnel, do we need to include the waiver with the application? Or we apply and then seek a waiver?

A: The IJ MUST include the entire cost of the program investments requested, explained in detail in the Target Hardening section (Part IV) of the IJ. Security personnel costs in excess of 50% of project costs must be clearly supported in the vulnerability/risk assessment. In the IJ, the applicant should make clear they will be seeking a waiver.

Q: Can you provide more details on how to complete the Milestones section (Part V)?
A: in this section, sub-applicants are asked to outline sequentially the expected key preparations, acquisition, and installation milestones that allow them to reach their objectives during the project's period of performance (i.e., the project schedule and scope of work). Estimated start and completion dates must be provided for each milestone.

In this section, sub-applicants are asked to outline their "estimated" project implementation plan. Completeness is important as the reviewers need to have confidence in the sub-applicant's full understanding of the scope of the project and what amounts to key milestones. Space is limited, so just the facts. The following serves as an example of a condensed list of milestones to illustrate ONLY what a sequence might look like. Each sub-applicant's response should be specific, complete, and relevant to their respective request and timeline. Sample Sequence:

- Receive award notification, complete award acceptance agreement, satisfy FEMA's Environmental Planning and Historic Preservation review (see below), and commence project.
- Establish payment method and satisfy all financial and programmatic reporting requirements.
- Hire vendors and contractors.
- Order and acquire equipment.
- Conduct engineering back work.
- Install equipment.
- Test equipment, develop punch list, and satisfy outstanding items and issues.
- Train staff in use and maintenance of equipment and technologies.
- Finalize delivery of project.
- Schedule/conduct allowable training/exercises.
- Close out project.

Q: Is a SAM number required for the entity?
A: SAM stands for System for Award Management. DHS/FEMA does not require nonprofit organizations to register with SAM.gov. However, some states do require it. States that require it will include the requirement in their Notice of Funding Opportunity. It may take four weeks or more for SAM registration to activate. Typically, states will require only funded sub-applicants (post award determinations) to register and the registration must be completed before projects can commence. But if it is a requirement in your state, check with the SAA on when the registration must be activated.

Information on SAM can be found at:
https://sam.directory/?gclid=EAIaIQobChMIvIyJ9dH05gIVBqSzCh2JAwtlEAAYASAAEgK7mfD_BwE.