



The Jewish Federations®  
OF NORTH AMERICA



## **Navigating the Nonprofit Security Grant Program (NSGP)**

### **Webinar FAQs**

**14 January 2021**

Prepared By: The Jewish Federations of North America (JFNA) & Secure Community Network (SCN)

#### **Q: Are previous grant recipients eligible for funding?**

A: Yes, if the award was made three or more years ago, we recommend that you undertake a new vulnerability/risk assessment. By reapplying, you are not eligible for the scoring bonus (5 points last year) FEMA has provided in recent years to first time grant recipients.

#### **Q: We had an official risk assessment in June 2019 in anticipation of applying for last year's grant. Can we use that same assessment, or do we need to have a more current one?**

A: 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.

#### **Q: Can we use this grant for cybersecurity?**

A: System, Information Technology Contingency Operations (14CI-00-COOP) is an eligible investment category under the Approved Equipment List. However, as a policy, FEMA and the SAAs have generally considered physical security enhancements more of a priority for funding. As cybersecurity has become a more pressing concern during the COVID-19 pandemic (as more people and businesses have moved to remote work settings), we have asked FEMA to address the cybersecurity question more clearly in the upcoming Notice of Funding Opportunity (NOFO). In the meantime, we advise that if seeking cyber-related investments that they be identified as a top vulnerability in the risk assessment and a recommended priority investment request.

#### **Q: Can you use a MAC to apply?**

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.

#### **Q: Do you know if two-way radio communications systems would be covered by the grant?**

A: Two-way radio communication systems are not covered by the grant. FEMA is considering reinstating Long Range Hailing and Warning Device (14SW-01-LRHW) in the Approved Equipment List. If reinstated, permissible costs might include audible hailing, buzzers, bells, whistles, voice instructions, and early warning technologies (i.e., cell phone messaging, flash messages, flash lighting (ADA compliant)). Once the NOFO is published, we will notify and provide guidance on any revisions to the AEL.

**Q: In order to start now, where do we get the application?**

A: Contact Rob Goldberg at: [Rob.Goldberg@JFNA.org](mailto:Rob.Goldberg@JFNA.org) to receive a sample Investment Justification and other preliminary guidance materials and updates.

**Q: Is there any sense of the range of “normal” grants that have been awarded?**

A: The award cap in recent years has been \$100,000.00 for both NSGP-Urban Area and NSGP-State initiatives. Depending on the program’s annual appropriation, the cap amount could go up or down. This year (FY 2021), we expect that the cap will remain the same or possibly increase to reflect the increase in the program’s annual appropriation by \$90 million over last year. Applicants should apply for investments up to the cap (or exceeding the cap, if warranted and additional non-federal resources are available), based on the priorities identified in the vulnerability/risk assessment and which, by industry standards, would be considered most appropriate. Generally speaking, applications funded under NSGP-Urban Area are awarded the amount requested so long as all the investments are eligible costs. However, under NSGP-State, State Administrative Agencies may reduce the cap and partially award applications in order to approve more applications. This year, as the NSGP-State program will receive \$50 million more than last year (for a total of \$90 million), it is possible that fewer states will opt to reduce the cap FEMA established in the NOFO.

**Q: If your 501(c)3 has locations in separate states, can you apply for the full amount both places or is it 1 lump sum for the entire agency?**

A: Yes, it is generally permissible for a 501(c)3 with locations in multiple states to apply for a grant in each state at the full cap amount. Additionally, FEMA is reviewing whether to allow in the next Notice of Funding Opportunity a 501(c)(3) with multiple locations within a single state to apply for multiple grants in that state. If FEMA permits this, the NOFO will set forth whether each application may apply for the cap independent of the other applications or whether in the aggregate they will be limited to falling within the cap.

**Q: Will the CISA House of Worship self-assessment tool be mentioned as a security assessment option?**

A: FEMA does not prescribe which tool an applicant may utilize as a basis for the grant. A professional assessment conducted by experienced assessors is advisable. SCN-supported community/regional security directors/advisors or state or local law enforcement partners may provide them free of charge.

If these options are not available, there may be privately available vendors available that will conduct assessments at a cost (not reimbursable through the grant). Private sector vendors may vary in cost, quality, and competency, so it is 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](mailto:dutydesk@securecommunitynetwork.org).

SCN has developed an NSGP-specific [Threat, Vulnerability & Risk Assessment \(TVRA\) Tool](#). CISA has also recently updated its faith-based resource page that supports efforts to maintain safe and secure houses of worship and related facilities, which can be accessed at: <https://www.cisa.gov/faith-based-organizations-houses-worship>.

**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](mailto:Rob.Goldberg@jewishfederations.org).

**Q: How do I find out who my SAA is in order to contact them?**

A: A number of State Administrative Agencies (SAA) are already taking proactive steps and posting preliminary information and pre-requisites to applying for the FY 2021 NSGP grant opportunity. It is therefore recommended that interested parties check in with their respective State Administrative Agencies (including their websites) to monitor whether any announcements or other preliminary actions have been taken by their SAAs and to request notification when the SAAs plan to initiate guidance on the next grant opportunity. The following is a link to FEMA's SAA contact list: <https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts>.

**Q: Our State has a state nonprofit security grant program. Is this federal grant separate or related to the State program?**

A: The Federal program is not formally affiliated with any state developed or led NSGP program. However, some states do relate their state grant opportunity with the Federal opportunity. It is therefore incumbent upon any potential federal applicant who is also considering applying for a state opportunity, if applicable, to review the requirements of the state grant opportunity. The States of CA, CT, FL, IL, MD, MA, MN, NJ, NY, OH and PA have on the books one or more state nonprofit security grant programs. You may request a Point of Contact for states with one or more state-based nonprofit security grant initiatives at: [Rob.Goldberg@jewishfederations.org](mailto:Rob.Goldberg@jewishfederations.org).

**Q: Our experience with past NSGP cycles is that it takes a while to get all of the interested organizations to undergo the required on-site assessment. Is the current assessment form available or can we use last year's application packet for this assessment?**

A: Generally speaking, any risk assessment 3 years or older should be redone. Any new investments being sought through the grant must be identified and supported through the risk assessment. If not, an applicant may need to supplement their existing risk assessment to cover new issues or concerns. If an applicant is planning to complete unfinished investments identified in its previous assessment, there

should be no problem in relying on the existing assessment. See above links to recommended self-assessment tools. Additionally, if your community has access to a Federation or SCN-supported community/regional security director/advisor you may want to consult them on questions pertaining to the risk-assessment and if not, to contact SCN's Duty Desk at: [dutydesk@securecommunitynetwork.org](mailto:dutydesk@securecommunitynetwork.org).

**Q: Under a prior coordinator, our synagogue was awarded a security grant. It then got caught in state red tape and bureaucracy and we have yet to receive any of the funds. I recently took over the lead on grant issues and cannot even get the state representative to return calls and e-mails. I am considering abandoning that grant and starting over and apply anew. If we have an unused grant from last year, can we apply this year?**

A: If you secured a grant in FY 2020, it would be strongly advisable to proceed with completing that grant as you are still in the period of performance for that grant. You may also seek an extension to the POP. Contact Rob Goldberg, directly, for additional assistance in navigating this post-award issue at: [Rob.Goldberg@jewishfederations.org](mailto:Rob.Goldberg@jewishfederations.org).

**Q: Are you familiar with any 3rd party services that can help in preparing the application?**

A: Often, Federation government affairs professionals and JCRC directors provide application assistance or advice, as do Federation community directors, SCN professionals. Additionally, JFNA provides extensive written guidance and is available to answer application questions at: [Rob.Goldberg@jewishfederations.org](mailto:Rob.Goldberg@jewishfederations.org). This advice comes without a fee. There are grant writers and vendors that may be hired from the private sector whose fees cannot be reimbursed through the grant. We do not provide referrals or vouch for the quality or veracity of their work. There is also no discernable advantage or disadvantage in the grant award results when employing a private sector grant writer. The SAA and FEMA reviewers will call into question applications with duplicate or template answers that may arise whether derived from private sector vendors or other potentially coordinated assistance. Additionally, the post-award administrative process requires competent grant managers. If an applicant is not equipped to undertake their application, they very well may not be competent to meet their post-award administrative responsibilities under the grant.

**Q: How do we determine who our State contact is supposed to be?**

A: The following is a link to FEMA's SAA contact list: <https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts>.

**Q: Is it true that the government does not want to fund security personnel on an on-going basis?**

A: Correct. We expect that the FEMA's FY 2021 guidance will continue to require nonprofit sub-applicants to submit a plan that explains how contracted security personnel costs will be sustained after the funding or period of performance of the award expires. In the absence of sustainment capabilities, this may not be considered by the SAA to be a good investment of limited resources. Additionally, given that the NSGP grant is competitive and possible that an applicant will not secure a grant year over year, FEMA and the SAAs prefer funding investments with long-term impacts relative to physical security investments.

**Q: What is the maximum grant allowed per entity?**

A: FEMA will set the funding caps in the Notice of Funding Opportunity. The current cap is \$100,000.00 for both the Urban Area and State programs, although the SAAs, especially under the State program, may choose to set a lower cap in their jurisdiction to increase the total number of applicants they recommend for funding across the state. If Congress increases or decreases the program's annual appropriations, FEMA may elect to increase or decrease the cap, accordingly for one or both programs. For FY 2021, Congress significantly increased the program's appropriation.

**Q: Does the federal grant program exclude funding for exercises and training? Our State's grant programs did not include these areas.**

A: The federal NSGP program can support several categories of permissible costs, including: Physical target hardening; emergency preparedness planning, training, and exercises; and the hiring of contracted security personnel. However, the lion share of the grant supports physical target hardening, consistent with FEMA's position that the program's primary intent is to save lives and protect property. Nevertheless, investments in emergency preparedness planning, training, and exercises are highly advisable.

**Q: Is it all or nothing? Either they accept all our requests or just a portion?**

A: Generally speaking, award decisions are not all or nothing. First, if an application includes impermissible costs, those costs could not be included in an award. Second, particularly under the NSGP State initiative, the SAA may choose to set a lower cap in their jurisdiction to increase the total number of applicants they recommend for funding across the state. We recommend that applicants apply for what they need as established by the vulnerability/risk assessment in order of priority as established by the assessment. Only 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 to be effective and efficient investments. It is advisable to organize investment requests and preliminary post-award implementation plans with the expectation that only partial funding might be awarded.

**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 feasible to assess a particular applicant's deficiencies.

**Q: Are Jewish summer camps eligible?**

A: Yes. The advent of the NSGP-State initiative has led to greater number of camps applying and receiving awards (and the fewer camps located within the NSGP-Urban Area jurisdiction have also received awards in the past). This year, SCN has invested in camp security assistance, including establishing a Camp Security Advisor. Interest camp directors may contact Jonathan Lacey, SCN Camp Security Advisor, at: [jlacey@securecommunitynetwork.org](mailto:jlacey@securecommunitynetwork.org).

**Q: Do we have documentation of where these security measures have actually deterred violence?**

A: The DHS Cybersecurity and Infrastructure Security Agency (CISA) reported in December 2020, that acts of targeted violence against houses of worship are a real—and potentially growing—problem in the United States. The data points to two distinct trends: that houses of worship face a baseline of persistent targeted criminal activity and that the specific threat of targeted violence may be increasing. One estimate based on FBI data projects that between 2000 and 2016, there were approximately 480 violent incidents per year against houses of worship. Additionally, mass shootings at houses of worship, which represent the greatest trauma and loss of life, have increased in the last five years. Qualitatively, a strong association appears to exist between social climate and threats to houses of worship. Historical analysis reveals that attacks on distinct ethnic and religious groups and individual houses of worship often accompany periods of intense racial and religious strife. Troubling signs indicate that the country has once again entered a period of social unrest with a simultaneous rise in bias-motivated attacks and hate crimes. In response, CISA recommends houses of worship [and related and affiliated organizations] develop and implement sound security practices to mitigate future incidents, including investments that are required, supported, and funded through FEMA’s Nonprofit Security Grant Program, including: conducting a vulnerability assessment, which identifies and prioritizes safety investments; applying physical security measures to monitor and protect houses of worship, childcare, daycare, and schools; and creating emergency action plans and incident response plans that are well communicated and exercised.

**Q: What if we have a religious exemption so are not a 501(C)(3) but are a non-profit?**

A: 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 application, they would leave the EIN number question blank. However, 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: If funds from a past grant have not been used up by the grant deadline, will we still be eligible?**

A: There is no prohibition to applying for a second grant, even if a prior grant is still in its period of performance. In the appropriate place in the Investment Justification (application), applicants are required to disclose and describe prior NSGP grant awards. If applying, the applicant should make sure that the investments requested are identified and prioritized in the vulnerability/risk assessment and differ, complement, or add to the existing award project plan, but do not duplicate it.

**Q: Most organizations that do vulnerability assessments have stopped doing them due to COVID. Will there be some consideration given by the awarding agencies due to COVID?**

A: FEMA does not prescribe which assessment tool an applicant should utilize as a basis for the grant. Regardless of the source, the SAAs will be reviewing the assessments for quality and completeness and prioritize and support the investments requested as efficient and effective impacts to address an applicant’s vulnerabilities.

As discussed above, there are basically three approaches to obtaining a vulnerability/risk assessment. Through:

- A professional assessment conducted by a Federation- and/or SCN-supported community/regional security directors/advisors, or state or local law enforcement partners.

- 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](mailto:dutydesk@securecommunitynetwork.org).
- A self-assessment, at no cost (See links above for recommend self-assessments).

[Obtaining an assessment is paramount to moving forward with the application. If struggling to proceed with an assessment plan, contact SCN's Duty Desk.]

**Q: Does FEMA provide the scores to applicants after they have made the awards?**

A: No, however, some State Administrative Agencies, in their discretion, may share some scoring details, if requested. FEMA and the SAAs are reviewing and administering tens of thousands of grants, NSGP being only a part. It is generally not their practice, as a logistical and/or security matter, to provide specific details regarding the review and scoring processes.

**Q: Is there someone we can contact before starting the application to get a sense as to whether work might meet the funding criteria? In our case specifically updating an alarm system's capabilities and adding an exit door that would improve sanctuary egress ability in the event of an incident?**

A: The investments requested must be clearly identified and prioritized in the mandatory vulnerability/risk assessment. Our preliminary grant guidance intends to help applicants understand what are considered eligible costs. Additionally, the Approved Equipment List identifies permissible physical security investments under the program and the industry standards for same. The State Administrative Agency is the ultimate advisor (and final word) as to what will be deemed a permissible cost under the grant. For further assistance:

- You may request JFNA's written guidance and technical assistance questions at: [Rob.Goldberg@jewishfederations.org](mailto:Rob.Goldberg@jewishfederations.org).
- You may seek guidance, particularly as they relate to preparedness planning, training and exercises under the program, at: [dutydesk@securecommunitynetwork.org](mailto:dutydesk@securecommunitynetwork.org).
- You may review FEMA's Approved Equipment List at: <https://www.fema.gov/grants/guidance-tools/authorized-equipment-list>. [Eligible NSGP equipment is limited to Categories 14 (physical security enhancement equipment) and 15 (inspection and screening systems)].
- You may locate your State's State Administrative Agency at: <https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts>.

**Q: Can you apply for this if you received CSNSGP funding this year? If so, does CSNSGP impact your eligibility?**

A: Securing a state grant through the California State Nonprofit Security Grant Program (CSNSGP), would not impact applying for the federal NSGP grant. There are no questions asked in the Investment Justification that refer to or seek details or confirmation of a state grant. Conversely, some state NSGP grants may be impacted if an applicant has previously secured the federal grant. That would be something to investigate, if applicable.

**Q: Can it be used towards a new building to be built?**

A: There are no prohibitions on seeking a federal NSGP grant for an existing structure, regardless of its age. However, the newness of a building might be a factor by state and federal reviewers. The vulnerability/risk assessment will bear out the vulnerabilities and weaknesses of the physical structure. With respect to applying federal NSGP funds “for” construction, per the most current guidance, all construction or renovation requests would require pre-approval from FEMA and, if approved, would be limited in cost to 15% of the total federal award. [JFNA plans to put out additional guidance on the question of construction and renovation shortly.]

**Q: Is the urban versus non-urban based on the company address or address of the site where the needs are?**

A: The physical address question will determine whether the sub-applicant applies under NSGP-Urban Area or NSGP-State. This will be one of the first checks the SAA makes. It is important that all applicants check to make sure they are applying for the correct program based on the physical address of the structure to be secured.

**Q: Does SCN think that the Christmas Day bombing may impact the state of available funding for Tennessee?**

A: There are generally four considerations/factors that will impact the scoring and final award decisions: 1) Whether the sub-applicant is deemed at a high risk of terrorist attacks due to their ideology, beliefs, or mission; 2) Whether the sub-applicant has previously received an award; 3) U.S. intelligence community reporting on security risks; and 4) All final funding determinations will be made by the Secretary of Homeland Security, who retains the discretion to consider other factors and information in addition to DHS/FEMA’s funding recommendations.

Additionally, within the Investment Justification, applicants are asked to discuss the identification and substantiation of prior threats or attacks against the organization or a closely related organization by a terrorist organization, network, or cell [or lone actor] (to include both foreign and domestic terrorists or violent homegrown extremists). You may request additional guidance on answering this question at: [Rob.Goldberg@jewishfederations.org](mailto:Rob.Goldberg@jewishfederations.org).

**Q: Is a permanent (rented, owned) physical location an eligibility requirement for this grant?**

A: The physical address for the grant may be rented or owned by the applicant. Temporary structures would not be eligible.

**Q: Can the funding be used to pay for contracted security personnel?**

A: We expect that the FEMA’s FY 2021 guidance will continue to require nonprofit sub-applicants to submit a plan that explains how contracted security personnel costs will be sustained after the funding or period of performance of the award expires. In the absence of sustainment capabilities, this may not be considered by the SAA to be a good investment of limited resources. Additionally, given that the NSGP grant is competitive and possible that an applicant will not secure a grant year over year, FEMA and the SAAs prefer funding investments with long-term impacts relative to physical security investments.

**Q: Is the grant evaluated at the state or federal level?**

A: Yes, to both. NSGP applications will be reviewed through a two-phase state and Federal review process for completeness, adherence to programmatic guidelines, feasibility, and how well the IJ (project description and justification) addresses the identified risk(s).

**Q: If not used for a new building - how about an additional wing added to a current building?**

A: An applicant may be located in a newer, older, or expanded building. The grant guidance does not prohibit or prescribe eligibility, per se, based on the age of the building or whether the original structure has been modified. As a risk-based program, the vulnerability/risk assessment provides an essential basis of review.

**Q: Is this grant open to all churches?**

A: All places of worship and other faith- and community-based 501(C)(3) organizations are eligible to apply.

**Q: Applicants must sign up with sam.gov. Does the Federal Government award the contract say for physical security and the applicant only manages the grant project, correct?**

A: Presently, and for the FY 2021 NSGP program DHS/FEMA does not require nonprofit organizations to register with the System for Award Management (SAM). However, some states do require it to contract with the state. States that require it will include the requirement in their respective Notice of Funding Opportunity instructions. If required, it may take four weeks or more for SAM registration to activate. Typically, states that require SAM registration will do so only for funded sub-applicants (post-award), who will need to complete the registration before projects can commence. In its simplest terms, SAM registration is a verification system that provides assurances to federal and state governments that they know the identities of the private sector entities they contract with.

**Q: Our location is about 20 miles away from Baltimore City. Would this be considered in the Baltimore Area?**

A: It is advisable to contact your SAA. You may locate your State's State Administrative Agency at: <https://www.fema.gov/grants/preparedness/sate-administrative-agency-contacts>.

**Q: Is it advisable to include letters of support from local politicians, leaders or law enforcement?**

A: No. FEMA and the SAAs want and will accept only the Investment Justification, Mission Statement, Vulnerability/Risk Assessment, documentation of specific threats to the entity, and any other specific materials requested by the respective SAA. This is a risk-based program. Efforts to impact the impartiality of the process would not be welcomed. Additionally, the submission of materials extraneous to what is requested or permitted by FEMA or the SAAs could lead to disqualification of an applicant.

**Q: Before COVID, our community was meeting at a local church (they have been providing space for free). We also do outdoor religious services and other on-location events and are looking to increase security awareness and preparedness in the greater community we serve.**

A: The Secure Community Network (SCN) provides several training courses, tabletop exercises and related preparedness and training opportunities. You may contact SCN to request critical infrastructure planning consultation. For general inquiries and security consultation, contact SCN at:

[dutydesk@securecommunitynetwork.org](mailto:dutydesk@securecommunitynetwork.org) or 844.SCN.DESK. For training requests, contact SCN at: [training@securecommunitynetwork.org](mailto:training@securecommunitynetwork.org).

**Q: Can we apply for funding for two different projects, e.g., (1) target hardening and (2) planning?**

A: Applicants may apply for multiple and varying investments within the same application. What is essential is that the investments requested are identified and supported as priorities within the vulnerability/risk assessment, are eligible costs under the grant guidance, are considered to be impactful to address identified vulnerabilities, and can be completed within the expected 36-month period of performance.

**Q: I got an email this morning that the Homeland security grants division has already posted request for applications and the application is available- due March 18 at 5 pm CST.**

A: FEMA will not release the FY 2021 NSGP Notice of Funding Opportunity until on or about the last week of February. However, some State Administrative Agencies are commencing advanced preparations for the pending FEMA NOFO announcement. Given these proactive steps, we recommend that interested applicants check in with their respective State Administrative Agencies (including their websites) for any announcements or other preliminary actions the SAAs may be taking or planning in advance of FEMA's release of the NOFO. The following is a link to FEMA's SAA contact list: <https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts>.

**Q: Can funding be used for internal security cameras as well as external?**

A: Generally speaking, yes. It is important that the investments requested are identified and supported as priorities within the vulnerability/risk assessment.

**Q: Assume U.S. Virgin Islands eligible to apply?**

A: Yes, under the NSGP-State initiative. In FY 2020, FEMA allocated \$300,000.00 to the U.S. Virgin Islands. The upcoming FY 2021 NSGP Notice of Funding Opportunity will set forth all allocations under the NSGP-State initiative for this year, including the U.S. Virgin Islands.

**Q: Is there a size requirement for the organization to apply? Can several organizations apply jointly?**

A: All places of worship and other faith- and community-based 501(C)(3) organizations are eligible to apply. Only one organization can apply per application. However, for multiple organizations located within the same physical structure, campus, or contiguous physical setting, investments sought could benefit multiple organizations.

**Q: In Maryland there are a number of grants that schools have recently applied for (3 just two weeks ago). Some of these grant funds overlap areas that are also funded by the NSPG. If we apply for funding through NSPG but subsequently receive funding through the state of MD, can we switch our NSPG request to an alternative allowed use?**

A: Funding may only be used for the investments specifically approved. Post-award waivers to modify approved investments are frowned-upon by FEMA, require SAA and FEMA approval, are time-consuming (could take up to a year or more for an outcome), and difficult to secure. Each waiver is reviewed on a case-by-case basis.

**Q: If I need a design by a structural engineer to provide a vehicle barrier, does the grant cover that?**

A: Possibly. Pre-award costs are generally not allowable for this program, nor are proof-of-concept initiatives. In general, costs related to construction and renovation projects require prior written approval from FEMA. It would be advisable to address the particulars of this question to the State Administrative Agency for a more definitive response.

**Q: How much can you ask for contracted security personnel?**

A: Contracted security personnel are allowed under this program. The FY 2021 NSGP Notice of Funding Opportunity will set forth the requirements for this allowable cost. Based on the FY 2020 NOFO and related guidance:

- Contracted security personnel cannot be a full or part-time employee on the payroll.
- The sub-applicant must demonstrate that they can sustain the cost without an NSGP award.
- NSGP funds cannot be used to purchase equipment for contract security personnel.
- Generally speaking, contracted security costs cannot exceed 50% of a total award without a waiver submitted by the SAA to FEMA. However, FEMA will generally 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.
- Always check in with the SAA before submitting a contracted security personnel request to be clear on their views and expectations with respect to this cost.

**Q: Assuming a grant application for say \$75,000, if the grant is given and there are insufficient funds to prepay, since we are dealing with reimbursement, are we eligible?**

A: The NSGP program is based on a reimbursement process. The period of performance is 36 months. Some vendors may agree to accept payment for services based on the reimbursement timeline. Some applicants may space the work out over time, implementing the next stage only after the prior stage is reimbursed. Some applicants may seek short term bridge loans. Others will apply up to what they are able to afford to lay out.

**Q: Are we eligible for the future expense of repaying a loan incurred for recent security enhancements?**

A: Among the unallowable costs are reimbursement of pre-award security expenses.

**Q: Where can we find the point system?**

A: The NSGP Investment Justification Scoring Worksheet is utilized by the State Administrative Agency. Materials related to the FY 2021 NSGP grant opportunity are not yet available. A sample copy of a previous scoring worksheet may be obtained at: <https://www.jrcny.org/security-justification/>

**Q: Can it be used in conjunction with the renovation of a building where increased target hardening is part of the renovation?**

A: Yes. What is essential is that the investments requested are identified and supported as priorities within the vulnerability/risk assessment, are eligible costs under the grant guidance, are considered to be impactful to address identified vulnerabilities, and can be completed within the expected 36-month period of performance. However, no pre-award costs can be reimbursed, and be cognizant that the

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. Be sure the timeline for NSGP project milestones lines up with existing or ongoing renovations.

**Q: So our congregation pays up front for the project and then we get reimbursed with the understanding that we are approved for the grant?**

A: FEMA will make an awards announcement sometime between mid-August and early September, and no later than September 31<sup>st</sup>. On a rolling basis, FEMA will inform the SAAs of the specific award results for their jurisdiction. The SAAs will then notify by email (to the points of contact specified in the application) if they have secured an award. The official notification of award received by the sub-applicant will include instructions on a number of post-award prerequisites and instructions that must be met and satisfied before they will be permitted to begin spending on the project. 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: Since the IJ has limited space to enter answers, is there guidance available as to how to shorten responses? Knowing which is the most important items to leave in?**

A: You may request additional written guidance materials on navigating the application at: [Rob.Goldberg@JFNA.org](mailto:Rob.Goldberg@JFNA.org).

**Q: Are the normal federal government requirements for competition for products and/or services applicable to the grant?**

A: While not mandatory per se, it is advisable to seek multiple bids for the acquisition and installation of approved equipment. The quality and cost of vendors and their products may vary.

**Q: Can an organization apply for 2 different locations?**

A: Currently it is permissible for an organization with locations in two or more states to apply separately in each state for an award. For FY 2021, FEMA is considering a change in the guidelines to allow an organization with multiple locations within the same state to each apply separately for a grant. Currently, it may be permissible for an organization with multiple locations located within the same state to split a single award between more than one location up to the cap. In these circumstances, it is best to confer with the SAA about such plans before applying, as the viability and allowability of a multi-location application may vary between SAAs.

**Q: Is this grant available to non-Jewish communities?**

A: All places of worship and other faith- and community-based 501(C)(3) organizations are eligible to apply.

**Q: What guidance is available for a proposed expenditure that logically is likely to be considered to be a 'Physical Security Enhancement Equipment' yet this equipment is a new physical security enhancement system that has never been submitted in the past as it is an innovation this year and has not previously been available commercially?**

A: Eligible NSGP equipment is limited to Categories 14 (physical security enhancement equipment) and 15 (inspection and screening systems)]. You may review FEMA's Approved Equipment List at:

<https://www.fema.gov/grants/guidance-tools/authorized-equipment-list>. Any modifications to the AEL would be described in the FY 2021 Notice of Funding Opportunity or accompanying supportive documents.

**Q: If we had received a separate state grant for security, do we need to identify that?**

A: No. Only previously funded federal NSGP award must be disclosed.

**Q: If you have a three-year Federal security grant awarded last year which won't be spent until after April 2021 can you still apply for another one, if warranted?**

A: Yes, there is no prohibition on applying for a second grant during the period of performance of an existing previous grant. Per the application, you would be required to disclose the prior grant.

**Q: How long does the reimbursement process take?**

A: Sub-recipients will be notified of awards (by email to the point of contact set forth in the Investment Justification). The notification will include an award package, which includes instructions on administering the grant award and requisite conditions associated with responsibilities for the project. The sub-recipients must accept all conditions in order to receive the award. Among the conditions for accepting the grant award will be a number of reporting requirements, including financial, programmatic, and closeout reporting. The awards package will provide instructions on satisfying these requirements and samples or links to necessary documentation/forms. Among the materials will be a reimbursement form, which would be submitted electronically. Each SAA will process submissions at their own rate, some may be more efficient than others. It would be advisable to speak with your respective SAA on timelines and expectations regarding the administration of the award.

**Q: Are there character limitations in the various sections of the grant application?**

A: There are seven parts to the Investment Justification. Some, but not all the sections, have character limitations. For those applicable sections of the IJ, the character limitations will be noted.

**Q: Usually there is a severe limitation on pure construction costs as a percentage of the grant received (I seem to remember 15% but I could be wrong).**

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.

**Q: What makes a strong application for contracted security personnel funding? We did a major physical hardening project this year and our application for funds for that last year were denied.**

A: We expect that the FEMA's FY 2021 guidance will continue to require nonprofit sub-applicants to submit a plan that explains how contracted security personnel costs will be sustained after the funding or period of performance of the award expires. In the absence of sustainment capabilities, this may not be considered by the SAA to be a good investment of limited resources. Additionally, given that the NSGP grant is competitive and possible that an applicant will not secure a grant year over year, FEMA

and the SAAs prefer funding investments with long-term impacts relative to physical security investments. A compelling request would require clear and strong justification for contracted security personnel in your vulnerability/risk assessment, and a strong articulation in both the Risk (part III) and Impact (part VII) sections of the IJ, in addition to a written plan that specifies how you will sustain the contracted security personnel over time.

**Q: When writing about how the organization has responded to terror attacks- would it be helpful to talk about how we have responded to the community in regard to COVID-19? Or will that not strengthen the point?**

A: A sub-applicant should explain the organization's specific or predominant role(s) played or expertise provided in emergency response/disaster recovery situations, using illustrations where possible. If making this case is more tenuous, the arguments may need to go broader. In times of emergency, whether man-made, such as a terror attack, or natural disaster, such as a hurricane or wildfire, consider what role the organization plays on behalf of the community. Examples may be as straightforward as the sub-applicant sharing vital information with the community (i.e., security alerts; hosting security briefings; organizing security-related community action); raising emergency funds; serving as a central point of contact with government agencies/first responders/other coordinating bodies, such as Federation; providing supports and services to community members/government agencies/first responders/other coordinating bodies. Responding to the COVID-19 pandemic might be an appropriate response.

**Q: The church I am involved in is needing to update its physical security majorly in regard to entrance points and video capability. Is this something that would be a potential candidate for the grant?**

A: All requested investments should be identified and prioritized in the vulnerability/risk assessment. Types of permissible physical security enhancements that could be funded, if identified and recommended in the assessment and considered to lead to the most effective and efficient impacts, include: Surveillance systems, Physical access control equipment, Impact resistant doors and gates, Intrusion detection sensors and alarms, Exterior lighting, Physical perimeter security: gates, fences, jersey barriers, Screening and inspection equipment. This list is not exhaustive. The entire list of eligible physical investments may be accessed at: <https://www.fema.gov/grants/guidance-tools/authorized-equipment-list>.

**Q: Is there an SCN resource available to review our application and provide specific guidance?**

A: Sub-applicants may want to contact SCN as they begin the planning process and with assistance with risk/vulnerability assessments and critical infrastructure planning consultation. For general inquiries and security consultation, contact SCN at: [dutydesk@securecommunitynetwork.org](mailto:dutydesk@securecommunitynetwork.org). For training requests, contact SCN at: [training@securecommunitynetwork.org](mailto:training@securecommunitynetwork.org).

**Q: I didn't see Ohio listed. Will Ohio be included this year?**

A: FEMA determines eligible areas for inclusion in the NSGP-Urban Area initiative. This may change from year to year. In the past and at differing times, Cleveland, Cincinnati, Columbus and Toledo have been included as designated Urban Areas. More recently, all Ohio communities have been eligible under the NSGP-State program. Remember, if not eligible under NSGP-UA, an organization will be eligible under

NSGP-State. FEMA will release the updated list of NSGP-UA areas in the upcoming Notice of Funding Opportunity.

**Q: Does a security assessment "expire"? If the assessment is two years old can we still use that or do we have to conduct another 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: Would monitoring fees for security cameras be included?**

A: Possibly. Fees associated with use or maintenance of equipment might be eligible. Check with SAA about the specifics and whether they would view them as permissible costs.

**Q: Is fencing including in physical hardening?**

A: Yes. The applicable descriptor: 14SW-01-WALL - Barriers: Fences; Jersey Walls - Obstacles designed to channel or halt pedestrian or vehicle-borne traffic in order to protect a physical asset or facility.

**Q: Are radios still allowed? I believe they do not fall under AEL 14 or 15 list?**

A: Two-way radio communication systems are not covered by the grant. FEMA is considering reinstating Long Range Hailing and Warning Device (14SW-01-LRHW) in the Approved Equipment List. If reinstated, permissible costs might include audible hailing, buzzers, bells, whistles, voice instructions, and early warning technologies (i.e., cell phone messaging, flash messages, flash lighting (ADA compliant)). Once the NOFO is published, we will notify and provide guidance on any revisions to the AEL.

**Q: How do I find out if Worcester is considered part of Boston for this grant?**

A: Worcester is not a part of the Boston Urban Area. The FY 2021 NSGP Notice of Funding Opportunity will list all eligible NSGO-Urban Area Areas. If Worcester is not listed, organizations from Worcester would apply under the NSGP-State initiative. You may always reach out to your SAA with questions, who can be located at: <https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts>.

**Q: Regarding internal/external cameras...Can application for grant money be used for leased equipment or only purchased?**

A: You would need to check with your SAA on the permissibility of acquiring and installing leased equipment. Even if permissible, the SAA may have opinions on whether leasing (verses purchasing) would be an efficient, effective (long term) investment. You may always reach out to your SAA with questions, who can be located at: <https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts>.

**Q: Many of these trainings are offered for free through DHS, local law enforcement agencies, and our regional security advisor. For budgeting purposes and to get a sense of the range of offerings, can you please provide a list of resources for training contractors?**

A: Planning, training and exercise workshops and opportunities are advisable inclusions in the NSGP application. To consider your training options, contact SCN at: [training@securecommunitynetwork.org](mailto:training@securecommunitynetwork.org).

**Q: Can Federations as a local convener in the community apply for training grants that are offered and open throughout the larger Jewish community or must the training be specific to Federation stakeholders relative to the Federation's facility?**

A: For the purposes of the grant, training costs would need to be specific to the applicant's physical location, and its staff, security, and members in order to be applicable. However, there are other opportunities you may pursue as a community convener outside of the NSGP grant. Planning, training and exercise workshops and opportunities may be provided by state/local law enforcement, CISA Protective Security Advisors, Federation or regional security advisors and or SCN personnel. To consider possible community preparedness training options, contact SCN at: [training@securecommunitynetwork.org](mailto:training@securecommunitynetwork.org).

**Q: If we already have contracted security personnel (off-duty police officers), can we seek funding to cover future costs?**

A: No. Pertaining to any investments under this program, organization costs, or operating expenses are not allowable. An expansion of existing contacted security personnel, however, would be allowable, if supported as a priority within the vulnerability/ risk assessment.

**Q: Can milestones be phrased as 2 months after award of grant, rather than specific date?**

A: Milestones are projections. Precise dates for meeting milestones are not required. Estimates would suffice. The period of performance for the entire project will specify a key and certain date and all project milestones must be completed before that date. You may request additional written guidance on completing the Investment Justification, including a sample milestones sequence at: [Rob.Goldberg@JFNA.org](mailto:Rob.Goldberg@JFNA.org).

**Q: Pandemic has severely impacted our ability to reach milestones as outlined in previous applications. How to communicate that to mitigate perception of incompetence?**

A: Part VI of the Investment Justification pertains to Project Management. In this section, applicants are requested to identify any potential challenges to project implementation. There are a number of common or predictable challenges a sub-applicant should consider, such as delays in the acquisition of equipment and installation of same, changes in cost estimates or other planning assumptions. This year, the impact of the COVID-19 pandemic could also be considered as a special circumstance that could impact program implementation. All projects run into problems, delays, challenges. Sub-applicants should give real thought to what they might expect and convey a competence for handling challenges to a satisfactory conclusion.

**Q: Including local law enforcement...is that emphasized to help create the relationship or does it help the application, or both?**

A: In addition to grant funding for target hardening and training activities or exercises, the NSGP grant opportunity is intended to promote a "Whole Community" approach to homeland security. In Part VI of the application under Project Management, applicants are requested to explain how they intend to improve integration of their nonprofit security within broader State and local preparedness efforts. The

steps to accomplish this may also be explained in the Milestone section of the application. You may request additional written guidance on this and other aspects of completing the Investment Justification at: [Rob.Goldberg@JFNA.org](mailto:Rob.Goldberg@JFNA.org).

**Q: Are religious schools eligible?**

A: Yes. All places of worship and other faith- and community-based 501(C)(3) organizations are eligible to apply.

**Q: 5 additional points for "not previously funded" or not funded in the last 5 years?**

A: Due to the competitive nature of the NSGP program (more applications than available funds), FEMA has applied a bonus between 1 – 10 points to the overall IJ score of sub-applicants who have not received a prior grant award. In FY 2020, 5 bonus points was applied. All sub-applicants are required to set forth their NSGP funding history.

**Q: Have the scoring rubrics been the same year to year or has there ever been significant changes to it?**

A: The evaluation criteria and scoring work sheet have been largely static. We will notify the field of any significant changes to the FY2021 Notice of Funding Opportunity once it is published.

**Q: Is Dun & Bradstreet number required?**

A: Yes. A current Dun & Bradstreet Number is required of all sub-applicants. To register or search for an existing DUNS Number, go to: <http://fedgov.dnb.com/webform/displayHomePage.do>. If one does not exist, it can be created as soon as one business day.

**Q: You mentioned that lighting would be included, does that mean if we replaced the lighting in the parking lot it would be covered?**

A: Yes. The Approved Equipment List includes 14SW-01-LITE - Lighting, Area, Fixed, described as fixed high-intensity lighting systems for improved visibility in areas such as building perimeters and surveillance zones.

**Q: How much time should I estimate the grant writing should take to complete?**

A: The Investment Justification consists of 7 parts (6 pages, with several space limitations). It is not a dense document and efficiency and brevity of responses is recommended. However, conducting a risk assessment takes time. Developing a plan takes thought. Prioritizing investments takes consideration, as does vetting and choosing vendors. We, therefore, advise applicants to do as much preliminary work and planning as possible and not to wait for the launch of Notice of Funding Opportunity to begin.

**Q: How much does an assessment usually cost?**

A: FEMA does not prescribe which self-assessment tool an applicant may utilize as a basis for the grant. A professional assessment conducted by experienced assessors is advisable. SCN-supported community/regional security directors/advisors or state or local law enforcement partners may provide them free of charge.

If these options are not available, there may be privately available vendors available that will conduct assessments at a cost (not reimbursable through the grant). Private sector vendors may vary in cost, quality, 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](mailto:dutydesk@securecommunitynetwork.org).

**Q: Will we be applying directly to UASI or via CalOES?**

A: FEMA administers the program nationally. The applicant is the State Administrative Agency. The sub-applicant is the nonprofit organization. The SAA is the point of contact for the sub-applicant on all matters pertaining to the program. For California, the SAA is California's Office of Emergency Services. Interested parties may access their respective SAAs at:

<https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts>

**Q: We are in capital campaign, and our current building is being used minimally. Can we apply for the security costs of our new facility?**

A: A organization may apply for a facility they are moving into if they own or lease it, conduct all requisites to applying, including conducting the vulnerability/risk assessment, and can complete the project within the 36-month period of performance.

**Q: Our current vulnerability assessment (which needs to be updated) was conducted by the county prosecutor's office. I noted that their VA only includes deficiencies in physical security, and does not address policies and procedures, training, exercises, presence (or quality of) EOPs. Is it permissible for us to develop an addendum to the county prosecutor's VA that covers these additional topics so we can request them in the IJ?**

A: If the current vulnerability/risk assessment is 3 or more years old, or is deficient in scope, it would be advisable to redo. As discussed above, there are several options to satisfying the assessment, including through self-assessment. For additional information, you may confer with SCN's Duty Desk at:

[dutydesk@securecommunitynetwork.org](mailto:dutydesk@securecommunitynetwork.org).

**Q: Alarm system installs or upgrades are allowable expenses, correct?**

A: Yes. The Approved Equipment List includes 14SW-01-ALRM - Systems/Sensors, Alarm, described as systems and standalone sensors designed to detect access violations or intrusions using sensors such as door/window switches, motion sensors, acoustic sensors, seismic, and thermal sensors. May also include temperature sensors for critical areas.

**Q: Would something that protects valuable items within the facility be allowable? ex. a safe**

A: No. Eligible NSGP equipment is limited to Categories 14 (physical security enhancement equipment) and 15 (inspection and screening systems)]. You may review FEMA's Approved Equipment List at:

<https://www.fema.gov/grants/guidance-tools/authorized-equipment-list>.

**Q: Many of us in NY have applied for the Securing Communities against Hate Crimes grant in 2020. Is there a timeline as to when those grants will be awarded? So that we don't apply for the same project from different funding streams?**

A: For New York State-related grant questions, we recommend contacting David M. Pollock, Associate Executive Director & Director, Public Policy and Jewish Security, JCRC of New York at: [pollockd@jcrny.org](mailto:pollockd@jcrny.org).

**Q: Will FEMA pay for the local contractors to provide plans and estimates used in the application?**

A: No. Unallowable costs include: Initiatives that fund risk or vulnerability security assessments or the development of the IJ proof-of-concept initiatives, or generally, any pre-award security expenses.

**Q: Are there defined suburban areas that are NOT applicable, eg, outside of NYC?**

A: Eligible nonprofit organization located in any community in the country may apply for the NSGP grant. They do so through either of two related initiatives – The NSGP-Urban Area or the NSGP-State. NSGP-Urban Area is limited to approximately 30 high-risk urban areas (the number may grow or decrease based upon a number of factors). The FY 2021 FEMA Notice of Funding Opportunity will set forth all eligible Urban Areas for the pending NSGP-Urban Area initiative. Organizations located anywhere else in the country will apply under the NSGP-State grant. The FY 2021 NOFO will also set forth minimum funding allocations available to each state and eligible U.S. territory.

**Q: There are local officers with Dept of Homeland Security in our community, and they have provided help with risk assessments to some organizations in prior years. Do you know if this is part of their job or is this a "side gig" which we would pay them?**

A: As time and resources are available, DHS Cybersecurity and Infrastructure Security Agency Protective Security Advisors may be able to help with vulnerability/risk assessments. You may locate and contact your regional PSA at: <https://www.cisa.gov/contact-us>

**Q: Steel or concrete barriers in front of main door to impede vehicle trying to crash thru-what category would this fit? and would it qualify for "points."**

A: All potential investments must be supported and prioritized in the vulnerability/risk assessment. There are a number of possible investments that might address the concerns you raise in this question. Two potential examples: 14SW-01-WALL - Barriers: Fences; Jersey Walls (obstacles designed to channel or halt pedestrian or vehicle-borne traffic in order to protect a physical asset or facility); and 14SW-01-DOOR - Doors and Gates, Impact Resistant (reinforced doors and gates with increased resistance to external impact for increased physical security).

**Q: Assuming that our SAA approves our application for continued grant funding, what is the likelihood we will obtain the grant?**

A: The SAA scores and prioritizes sub-applications, and then submits them to FEMA for review. FEMA further scores and prioritizes the sub-applications and makes recommendations to the Secretary of Homeland Security. The Secretary makes all final award decisions. Historically, about one-third of requests submitted by SAAs were funded in any given year. This past year, with increased funding, closer to 50 percent of applications submitted by SAAs were funded. For this cycle, available funding has doubled over last year's level which may have a positive impact on results. However, there are several factors that influence award decisions that make it difficult to predict outcomes, 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).

**Q: Is there a cost-sharing requirement?**

A: We do not expect any cost-sharing requirement.

**Q: Should we plan to include actual quotes for proposed work with our application?**

A: No, do not submit any extraneous materials not requested by the State Administrative Agency. There are 2 sections to Part IV of the Investment Justification In the narrative section, sub-applicants are instructed to describe all target hardening activities, as well as costs related to planning, exercises, training and contracted security personnel. In the equipment identification section, sub-applicants are required to input details identifying the specific equipment (from the AEL list) to be acquired, including estimated costs.

**Q: Estimates used for last year's NSGP application are proving to be inadequate. May we request funding to complete an approved project?**

A: Generally, sub-applicants may request investments that complete, expand or relate to investments previously acquired and funded through a prior NSGP award. However, if unforeseen circumstances, such as changes in cost estimates or other planning assumption, have impacted the completion of a current grant, it is advisable to confer with your State Administrative Agency on both remedying your current grant situation and plans to apply for a subsequent award.

**Q: If we apply for \$100,000 but only receive \$75,000, will we be allowed to reduce our milestones accordingly?**

A: Yes. There will be a number of post-award requisites to be satisfied before a project may commence. This includes developing an approved implementation plan, which will address a number of items estimated in the Investment Justification, such as estimated milestones that will reflect the actual award amount and approved investments.

**Q: How does the requesting organization manage the external hardening needs vs the restrictions on a building on the national and state historic registers. Does this have to be resolved prior to application submission?**

A: There will be a number of post-award requisites to be satisfied before a project may commence. This includes environmental planning and historic preservation (EHP) compliance. DHS/FEMA is required to ensure that all activities and programs funded by them, including NSGP grant-funded projects, comply with Federal EHP regulations, laws, and Executive Orders, as applicable. The EHP review process involves the submission of a detailed project description along with any supporting documentation requested by DHS/FEMA in order to determine whether the proposed project has the potential to impact environmental resources or historic properties. For most sub-grantees, meeting the requirement is merely a nuisance that delays their project start date. However, if a sub-applicant is contemplating potential issues pertaining to securing EHP compliance, it is advisable that they be proactive in understanding what is required and if they have concerns certain investments may not satisfy EHP compliance, they may want to consider avoiding them. Information about EHP certification may be found at: <https://www.fema.gov/grants/preparedness/preparedness-grants-ehp-compliance> and

<https://www.fema.gov/grants/guidance-tools/environmental-historic>. Remember, this is a post-award requirement. The SAA may be able to address additional preliminary questions.