Nonprofit Security Grant Program (FY 2021)

Overview and Preliminary Guidance

21 December 2020

NONPROFIT SECURITY GRANT PROGRAM
OVERVIEW & GUIDANCE

December 2020

BACKGROUND

In 2005, the U.S. Department of Homeland Security (DHS) established the Nonprofit Security Grant Program (NSGP), as part of the Department's Urban Areas Security Initiative (UASI). The NSGP was designed to provide grant funding to eligible nonprofit organizations determined to be at-risk of terrorist attack, with a specific objective of supporting the acquisition and installation of physical target hardening measures and related security equipment. The initial program was established at the behest of The Jewish Federations of North America (JFNA), who has worked diligently each year leading a coalition of partners to ensure the continuity and funding of the program. Since the program's inception, Congress has appropriated nearly $418 million dollars for this initiative, and has awarded more than 4,900 grant awards through Fiscal Year (FY) 2020.

CURRENT PROGRAM STATUS UPDATE

It is expected that the NSGP will continue to focus on the nation's highest risk areas, including urban areas that face the most significant threats. Since 2018, however, and recognizing shifting threat dynamics, a designated amount of funding has been made available to entities located outside of designated Urban Areas, to include smaller and rural communities.

The amount of funding to be appropriated by Congress for the NSGP-UA (Urban Areas) and the NSGP-S (Non-Urban Areas) for FY2021 is expected to total $180M, split evenly between the two. The program will provide support for permissible target hardening equipment and measures as well as related training/activities.

The target date for the announcement of the State and Local Preparedness Grant Programs for FY2021 is expected to be in February 2021, dependent upon final approval of funding amounts by Congress. Historically, applications have been released on/or about 14 February 2020. The announcement in the form of a Notice of Funding Opportunity is expected to coincide with the release of grant guidance to all of the State designated homeland security/emergency management agencies (State Administrative Agencies). The State Administrative Agencies (SAAs) are the applicants responsible for administering the NSGP program on behalf of the nonprofit sub-grantees.

Shortly after the guidance is released, SCN, JFNA and its partners will be releasing additional guidance developed specifically for sub-grantees, based on the new DHS guidance.

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The following information is based on previous guidance as well as what is known about the forecasted guidance for FY2021:

ELIGIBILITY
- Applicants must be the State Administrative Agency (SAA).
- Sub-grantees must be 501(c)(3) nonprofit organizations.
- Eligible sub-grantees will be able to apply under either NSGP-UA or NSGP-S (See Appendix).
- Sub-grantees must only request funding for approved equipment/activities.
- Sub-grantees must submit their applications to the SAA.

APPLICATION
- Sub-grant applications are competitive and risk-based.
- Sub-grantees must use the Investment Justification (IJ) template provided by their SAA.
- Sub-grantees must include the organization's Dun & Bradstreet Number (DUNS) in the IJ application template where requested or obtain one.
- Sub-grantees must provide a "mission statement", which explains the nature of the applicant organization's purpose and mission, and choose from one of the following designations: 1) Ideology-based/spiritual/religious; 2) Educational; 3) Medical; or 4) Other.
- Sub-grantees must have a vulnerability/risk assessment on which the IJ is based.
- The IJ will be reviewed in two steps. First, the SAA will score each IJ, rank them, and submit them to FEMA. FEMA will review the submissions further and make a final award determination.

TIMING
- The Notice of Funding Opportunity will be released about 60 days after Congress approves funding for FY2021. The Grant process has historically commenced during the middle of February, specifically on/or around 14 February 2020.
- FEMA will set the deadline for SAAs to submit their applications to FEMA. This period is expected to run between 45 and 60 days. Part of this period (approximately 30 days) will be designated for nonprofits to submit their applications. The remainder of the time will be designated for SAAs to review and submit the requests to FEMA.
- The SAAs will set the deadline (with some discretion and variations between localities) for sub-grantees to submit their IJs to them.
- FEMA will announce final award decisions likely on/or about September 1st.

CURRENT FUNDING OPPORTUNITIES

As initially established in FY 2005, the NSGP program funded projects in a limited number of qualifying high-threat urban areas (NSGP-Urban Area). Beginning in FY2018, Congress, at the request of JFNA, expanded the eligibility of the program through a second prong to assist a greater number of communities (NSGP-State). In nearly all respects, the two program prongs operate

identically, but are funded through separate appropriations. As noted, appropriations for FY21 are expected to designate $90M to both the NSGP-UA and $90M to the NSGP-S programs.

This year, as with last year, we expect that the maximum possible grant award for both prongs of the program will be set by FEMA at the identical level of $100,000. However, especially with the NSGP-State prong, the SAAs may set the award level for their jurisdiction below the maximum level established by FEMA. Note: FEMA determines the level of funding per each state (under NSGP-S) and UASI Area (under NSGP-UA), and the funding once awarded is distributed on a reimbursement basis.

GUIDANCE

I.   **Nonprofit Security Grant Program (NSGP)**

With the NSGP, it is the responsibility of the SAAs to provide official guidance to the sub-grantees and administer the application process locally. The nonprofit sub-grantees have no direct communication or relationship with FEMA in this process. Once released, JFNA, SCN and partners will review the guidance to ascertain what is applicable to the sub-grantees, and then in short order send out broad supplemental guidance to stakeholders that is designed to assist in completing the application, Investment Justification, and in fulfilling the requirements of the grant.

II.   **Permissible Costs**

General allowable NSGP costs:

- **Equipment:** Funding is limited to target hardening and physical security enhancements. This includes the acquisition (purchase or possible leasing) and installation of security equipment on real property (including buildings and improvements) <u>owned or leased</u> by the nonprofit organization, specifically in prevention of and/or protection against the risk of a terrorist attack. This equipment is limited to select items within two categories on the **Authorized Equipment List (AEL)**:

  o   Physical Security Enhancement Equipment (Section 14)
  o   Inspection and Screening Systems (Section 15)

  The two allowable prevention and protection categories and equipment standards for the NSGP are listed at http://www.fema.gov/authorized-equipment-list.

- **Planning:** Funding may be used for security or emergency planning expenses and the materials required to conduct planning activities. Planning must be related to the protection of the facility and the people within the facility. Examples of planning activities allowable under this program include:

- o Development and enhancement of security plans and protocols
- o Development or further strengthening of security assessments
- o Emergency contingency plans
- o Evacuation/Shelter-in-place plans

- **Exercises:** Funding may be used to conduct security-related exercises. This includes costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, and documentation. Exercises afford organizations the opportunity to validate plans and procedures, evaluate capabilities, and assess progress toward meeting capability targets in a controlled, low risk setting.

- **Training:** Nonprofit organizations may use NSGP funds for the following training-related costs:

  - o Employed or volunteer security staff to attend security-related training within the United States;
  - o Employed or volunteer staff to attend security-related training within the United States with the intent of training other employees or members/congregants upon completing the training (i.e., "train-the-trainer" type courses);
  - o Nonprofit organization's employees, or members/congregants to receive on-site security training.

  Allowable training-related costs under the NSGP are limited to attendance fees for training and related expenses, such as materials, supplies, and/or equipment.

  Allowable training topics are limited to the protection of critical infrastructure key resources, including physical and cybersecurity, target hardening, and terrorism awareness/employee preparedness including programs such as Community Emergency Response Team (CERT) training, Active Shooter training, and emergency first aid training. Training conducted using NSGP funds must address a specific threat and/or vulnerability, as identified in the nonprofit organization's Investment Justification. Training should provide the opportunity to demonstrate and validate skills learned as well as to identify any gaps in these skills.

- **Hiring:** Beginning in the FY 2019 Notice of Funding Opportunity, contracted security personnel are allowed under this program. Any applicant wishing to utilize funding for these costs must demonstrate the ability to sustain this capability in future years without NSGP funding. The SAAs may value this investment differently (some may favor, others disfavor, and others have no opinion), so it is incumbent upon an applicant planning on contracting security personnel to check in with their SAA before pursuing this investment regarding the SAA's requirements of and perspectives on this investment.

All permissible costs to be considered for funding using the NSGP must be included in the nonprofit organization's Investment Justification. If not included, equipment and/or activities will be ineligible

for funding. As described below, SCN may provide support and consultation related to these permissible investments. Reimbursement for pre-award security investments, the implementation of the vulnerability/risk assessment and the development/completion of the Investment Justification are generally unallowable costs.

III.   Engaging the State Administrative Agencies

The State Administrative Agencies may operate the NSGP-UA and NSGP-S programs somewhat differently from state to state, as the guidelines provide the SAAs with a degree of latitude/discretion in how they proceed. While JFNA and SCN will help sub-applicants with FEMA-provided guidance, the SAAs interpretation and application of those guidelines may vary between states.

Under these circumstances, it is recommended that individuals who are leading/coordinating the submission of applications for the NSGP for Federations, organizations and/or communities contact the appropriate grant administrator or other point-of-contact at their respective SAA to obtain state guidance and any additional details, as necessary.

As the NSGP-S is new, this outreach may provide a particularly valuable opportunity to assist SAA's with developing and/or shaping guidance and program parameters. As key stakeholders for the Jewish community, you will want to weigh in on how the SAA proceeds with this new opportunity in order to maximize the potential benefit to at-risk communities/organizations.

FEMA maintains an SAA Contact List, which can be accessed on the FEMA website.

GRANT APPLICATION: PREPARATION & GUIDANCE

Based on a review and assessment of prior year applications, it is expected that the NSGP application will feature similar components and requirements. We urge applicants who have not already started to complete key pre-requisite activities – to include appropriate federal registrations, vulnerability/risk assessments and other pre-application activities – to do so immediately.

Pre-Application Checklist & Process Recommendations

We urge organizations and applicants interested in applying to undertake the following best practices in order to ensure a strong application:

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- Bring together key stakeholders within your organization to plan how you will approach the process. This may include your executive, finance personnel, to include those responsible for grant applications, any individuals responsible for security and/or facilities as well as, depending on the nature of the desired improvements, Information Technology staff or support.
- Contact your SAA for specific grant information, guidance, deadlines and any state-level requirements (i.e., some states require sub-awardee to register with SAM.gov)
- Contact and/or coordinate with your Federation Community Security Director or SCN Regional Security Advisor, if applicable.
- Complete any state-level pre-registrations or pre-qualifications, if required, to ensure your organization is eligible and pre-registered to apply for a grant, if applicable.
- Conduct a facility risk/vulnerability assessment to determine the risks, vulnerabilities (gaps and areas that require target hardening), and consequences of a terrorist attack. This is a requirement for all grant applicants.
- Review the 2020 Investment Justification (IJ). The IJ is the bulk of the application and makes your case, based on risk and threat, for target hardening and equipment selection justification based on your risk/vulnerability assessment of risk, vulnerability and consequence of an attack (i.e., identified gaps, and recommended security considerations, enhancements and upgrades).
- Compile and research relevant risk and threat information as it relates to your facility, state or Jewish community in general. Known threats or issues related to a specific facility and/or the community as well local crime statistics are good resources for additional historical data and incidents.
- Review the Authorized Equipment List (AEL) to familiarized yourself with approved security equipment.
- Identify what solutions and/or enhancements are desired and/or required for your facility.
- Identify vendors and security solutions providers who can review your risk/vulnerability assessments and offer preliminary scope of work, project estimates and related costs, which can be incorporated into the application.

SCN SUPPORT & CONSULT

The Secure Community Network, formed in 2004 under the auspices of The Jewish Federations of North America and the Conference of Presidents of Major American Jewish Organizations, serves as the official safety and security organization, working on behalf of the organized Jewish community in North America

Through the Duty Desk, SCN acts as a central coordinating entity for the Jewish community, undertaking threat monitoring, intelligence as well as information gathering, analysis and

dissemination and also provides an operational response capability during incidents (e.g., mass casualty events and/or targeted attacks and/or threats against the Jewish community).

SCN routinely supports the development of strategic security programs, to include training and conducting and/or assisting in the coordination and facilitation of risk assessments for Federations and other Jewish institutions and facilities, which are both a component of any comprehensive security program and which may be used in support of the NSGP.

Through the SCN Critical Infrastructure Program, SCN's team can assist in providing physical security consultation, assist with recommendations based on a completed risk/vulnerability assessment and provide general guidance and specifications on physical equipment and enhancement.

As part of our service offering, SCN may be able to offer a limited number of risk assessments during the grant application period for the NSGP and following the completion of previously requested and scheduled assessments which are currently underway.

Dependent on operational demands and scheduling, and following the completion of prior requests, SCN will have some availability to conduct additional assessments over the coming months. Priority will be given to communities who have undertaken, are in the process of and/or interested in developing a comprehensive security framework.

For those communities with a Federation-based Community Security Director or SCN Regional Security Advisor, organizations should contact and/or coordinate with them to determine if they are able to support risk assessments during the grant application period.

It is strongly advised to work through Jewish-community organization-based professionals, due to their understanding of the unique threats and issues facing institutions as well as capability to provide ongoing support during the entire process.

Another trusted partner is the DHS Protective Security Advisor (PSA) program. SCN has worked extensively with PSAs throughout the country, and they may be able to assist with vulnerability/risk assessments. Please note that PSAs generally have a very full schedule and any effort to have them support an assessment process should be initiated well in advance of the grant application process.

As another option, facilities and organizations should contact their local law enforcement agency or state homeland security office who may be able to assist in conducting or recommending additional resources to conduct an assessment.

Lastly, for those organizations unable to coordinate or schedule an outside assessment, SCN has developed an "SCN Self-Assessment Tool" for facilities to complete to conduct their own self-assessment, which will be made available to interested organizations by request.

To discuss your strategic security efforts, to include the potential for undertaking risk assessments, please contact the SCN Duty Desk at DutyDesk@securecommunitynetwork.org.

CONTACT

For specific grant related questions, individuals are encouraged to contact Rob Goldberg, Senior Director, Legislative Affairs, at Robert.Goldberg@JewishFederations.org

For security, risk assessment, critical infrastructure consultation or other related questions, please contact the SCN Duty Desk at 844-SCN-DESK or DutyDesk@securecommunitynetwork.org

Note: Special Thanks to the team members at the JFNA Washington, D.C. office for their ongoing work and development efforts, to include related to this guidance, for the NSGP, and on behalf of the community.

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APPENDIX

FY 2020 Designated UASI Regions*

Arizona: Phoenix Area
California: Anaheim/Santa Ana Area, Bay Area, Los Angeles/Long Beach Area, Riverside Area, Sacramento Area, San Diego Area
Colorado: Denver Area
District of Columbia: National Capital Region
Florida: Miami/Fort Lauderdale Area, Orlando Area, Tampa Area
Georgia: Atlanta Area
Hawaii: Honolulu
Illinois: Chicago Area
Louisiana: New Orleans Area
Maryland: Baltimore Area
Massachusetts: Boston Area
Michigan: Detroit Area
Minnesota: Twin Cities Area
Missouri: St. Louis Area
Nevada: Las Vegas
New Jersey: Jersey City/Newark Area
New York: New York City Area
Oregon: Portland Area
Pennsylvania: Philadelphia Area, Pittsburgh Area
Texas: Dallas/Fort Worth/Arlington Area, Houston Area, San Antonio Area
Virginia: Hampton Roads Area
Washington: Seattle Area

* Designated areas are determined annually through a calculation mandated by Congress. Through this measurement, the program is limited to urban areas representing up to 85 percent of the cumulative national terrorism risk to urban areas and that resources will continue to be allocated in proportion to risk.

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