

**The U.S. Department of Homeland Security (DHS)
Notice of Funding Opportunity (NOFO)
Fiscal Year (FY) 2018 Nonprofit Security Grant Program (NSGP)**

NOTE: If you are going to apply for this funding opportunity and have not obtained a Data Universal Numbering System (DUNS) number and/or are not currently registered in the System for Award Management (SAM), please take immediate action to obtain a DUNS Number, if applicable, and then to register immediately in SAM. It may take 4 weeks or more after you submit your SAM registration before your registration is active in SAM, then an additional 24 hours for Grants.gov to recognize your information. Information on obtaining a DUNS number and registering in SAM is available from Grants.gov at: <http://www.grants.gov/web/grants/register.html>. Detailed information regarding DUNS and SAM is also provided in Section D of this NOFO, subsection, [Content and Form of Application Submission](#).

A. Program Description

Issued By

U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Grant Programs Directorate (GPD)

Catalog of Federal Domestic Assistance (CFDA) Number

97.008

CFDA Title

Nonprofit Security Grant Program (NSGP)

Notice of Funding Opportunity Title

Nonprofit Security Grant Program

NOFO Number

DHS-18-GPD-008-00-01

Authorizing Authority for Program

Section 2003 of the *Homeland Security Act of 2002* (Pub. L. No. 107-296, as amended) (6 U.S.C. § 604)

Appropriation Authority for Program

Department of Homeland Security Appropriations Act, 2018 (Pub. L. No. 115-141)

Program Type

New

Program Overview, Objectives and Priorities

Overview

The FY 2018 Nonprofit Security Grant Program (NSGP) is set against the backdrop of a year in which the United States faced numerous and unprecedented homeland security challenges. These included the three major hurricanes that devastated parts of Texas, Florida, and much of Puerto Rico and the U.S. Virgin Islands, as well as massive wildfires across the State of California. In addition to these natural disasters, the Nation also responded to multiple incidents as part of the evolving threat landscape, including witnessing the first known terrorist attack executed against mass transportation on our soil; cyberattacks against critical port infrastructure; and mass casualty events involving both vehicles and active shooters.

The National Preparedness Goal (the Goal) defines what it means to be prepared for such diverse and complicated events. The National Preparedness System is the instrument the Nation employs to build, sustain, and deliver the core capabilities needed to achieve the goal of a more secure and resilient Nation. The development and sustainment of these core capabilities is not exclusive to any single level of government or organization, but rather requires the combined effort of the whole community. To that end, the FY 2018 NSGP represents one part of a comprehensive set of measures authorized by Congress and implemented by the Administration. Among the five basic homeland security missions noted in the DHS Quadrennial Homeland Security Review, the NSGP supports the goal to Strengthen National Preparedness and Resilience.

The recently released [2018-2022 FEMA Strategic Plan](#) creates a shared vision for the field of emergency management and sets an ambitious, yet achievable, path forward to unify and further professionalize emergency management across the country. The Nonprofit Security Grant Program supports the goal of Ready the Nation for Catastrophic Disasters. We invite all of our stakeholders and partners to also adopt these priorities and join us in building a stronger Agency and a more prepared and resilient Nation.

Objectives

NSGP seeks to integrate the preparedness activities of nonprofit organizations that are at high risk of a terrorist attack with broader state and local preparedness efforts. In FY 2018, multiple funding allocations have been appropriated for nonprofit organizations located inside or outside of FY 2018 Urban Area Security Initiative (UASI) designated urban areas. As in previous fiscal years, the Nonprofit Security Grant Program - Urban Area (NSGP-UA) will be a competitive grant program that funds nonprofits located in UASI-designated urban areas. Under the Nonprofit Security Grant Program - State (NSGP-S), each state will receive an allocation for nonprofit organizations located outside of FY 2018 Urban Area Security Initiative (UASI)-designated urban areas.

The FY 2018 NSGP objectives are to support efforts that:

- Build and sustain core capabilities
- Strengthen governance integration between private nonprofit entities and Federal, state, and local governments
- Encourage a whole community approach to security and emergency management

Performance metrics for this program are as follows:

- Percent of NSGP funding used to build new capabilities
- Percent of NSGP funding used to sustain existing capabilities

Priorities

The FY 2018 NSGP provides funding support for physical security enhancements and other security activities to nonprofit organizations that are at high risk of a terrorist attack.

The FY 2018 NSGP plays an important role in the implementation of the National Preparedness System by supporting the development and sustainment of core capabilities. The core capabilities, outlined in the Goal are essential for the execution of the five mission areas—Prevention, Protection, Mitigation, Response, and Recovery—and the realization of a secure and resilient Nation. The development and sustainment of these core capabilities are not exclusive to any single organization, but rather require the combined effort of the whole community. The FY 2018 NSGP’s allowable costs support efforts to build and sustain core capabilities across mission areas. For additional details on priorities and additional costs for this program, please refer to [Appendix B – NSGP Priorities](#).

B. Federal Award Information

Award Amounts, Important Dates, and Extensions

Available Funding for the NSGP: \$60,000,000, of which:

\$50,000,000 for NSGP-UA; and

\$10,000,000 for NSGP-S

NSGP-UA

Each nonprofit organization may apply for up to \$150,000 and must apply through their respective State Administrative Agency (SAA).

NSGP-S

The SAA may determine an award cap for individual subawards up to a maximum of \$100,000. Nonprofit organizations must apply through their respective SAA.

Period of Performance:

Thirty-six (36) months

Extensions to the period of performance are allowed. For additional information on period of performance extensions, refer to [Section H](#) of this NOFO, *Additional Information - Extensions*.

Projected Period of Performance Start Date(s): September 1, 2018

Projected Period of Performance End Date(s): August 31, 2021

Funding Instrument:

Grant

C. Eligibility Information

Eligible Applicants

The SAA is the only entity eligible to apply for FY 2018 NSGP funds on behalf of eligible nonprofit organizations.

Nonprofit organizations must apply for FY 2018 NSGP through their SAA. A list of SAA points of contact is available at: <http://www.fema.gov/media-library/assets/documents/28689?id=6363>. Nonprofit organizations **may not** apply directly to DHS/FEMA for FY 2018 NSGP funds.

SAA's, in coordination with the Urban Area Working Groups (UAWG) and other state partners, are encouraged to notify and actively inform eligible nonprofit organizations of the availability of FY 2018 NSGP funding.

Eligibility Criteria

Eligible nonprofit organizations are those organizations that are:

1. Described under section 501(c)(3) of the Internal Revenue Code of 1986 (IRC) and exempt from tax under section 501(a) of such code; refer to links below for additional information:

- <https://www.irs.gov/charities-non-profits/charitable-organizations/exemption-requirements-section-501-c-3-organizations>
- <https://www.irs.gov/publications/p557/ch03.html>
- <https://www.irs.gov/charities-non-profits>

Note: The Internal Revenue Service (IRS) does not require certain organizations such as churches, mosques, and synagogues to apply for and receive a recognition of exemption under section 501(c)(3) of the IRC. Such organizations are automatically exempt if they meet the requirements of section 501(c)(3). These organizations are not required to provide recognition of exemption. For organizations that the IRS requires to apply for and receive a recognition of exemption under 501(c)(3), the state may or may not require recognition of exemption, as long as the method chosen is applied consistently.

2. Determined to be at high risk of a terrorist attack by the Secretary of Homeland Security; and
3. For NSGP-UA only, located within one of the FY 2018 UASI-designated urban areas, listed in [Appendix A- FY 2018 NSGP UASI- Designated Urban Areas](#).

Eligible nonprofits located outside of FY 2018 UASI-designated urban areas may apply to the SAA to receive funding only under NSGP-S and eligible nonprofits located within FY 2018 UASI-designated urban areas may apply to the SAA to receive funding only under NSGP-UA. DHS/FEMA will verify that the nonprofit has been included in the correct program and may disqualify applications that are not included in the correct program.

Other Eligibility Criteria

National Incident Management System (NIMS) Implementation

Prior to allocation of any Federal preparedness awards in FY 2018, recipients must ensure and maintain adoption and implementation of NIMS. DHS/FEMA describes the specific activities involved in NIMS implementation in the NIMS Implementation Objectives

<https://www.fema.gov/implementation-guidance-and-reporting>.

Incident management activities require carefully managed resources (personnel, teams, facilities, equipment and/or supplies). Utilization of the standardized resource management concepts such as typing, credentialing, and inventorying promote a strong national mutual aid capability needed to support delivery of core capabilities. Recipients should manage resources purchased or supported with DHS/FEMA grant funding according to NIMS resource management guidance. Additional information on resource management and NIMS resource typing definitions and job titles/position qualifications is available on DHS/FEMA's website under <http://www.fema.gov/resource-management-mutual-aid>.

Nonprofit subrecipients are not required to maintain adoption and implementation of NIMS.

Cost Share or Match

There is no cost share requirement for the FY 2018 NSGP.

D. Application and Submission Information

Key Dates and Times

Date Posted to Grants.gov:

May 21, 2018

Application Submission Deadline for the SAA: June 20, 2018, 5:00PM ET

Application Submission Deadline for Nonprofit Organizations:

SAAs establish all requirements and deadlines to manage their nonprofit sub-application process in support of their submissions to DHS/FEMA. Deadlines and state requirements may vary from state to state. Contact the SAA for submission deadlines or additional information.

Nonprofit applications are due to the SAA before the application submission deadline for SAAs of June 20, 2018.

All applications **must** be received by the established deadline. The Non-Disaster (ND) Grants System has a date stamp that indicates when an application is submitted. Applicants will receive an electronic message confirming receipt of the full application. **Due to the competitive nature of the NSGP, DHS/FEMA will not review applications that are not received by the deadline or consider them for funding.** DHS/FEMA may, however, extend the application deadline by request for any applicant who can demonstrate that good cause exists to justify extending the deadline. Good cause for an extension may include technical problems outside of the applicant's

control that prevent submission of the application by the deadline, or other exigent or emergency circumstances. Applicants who experience technical issues must notify their DHS/FEMA Headquarters (HQ) Program Analyst before the application deadline. Applicants should contact the Centralized Scheduling and Information Desk (CSID) for FEMA HQ Program Analyst contact information. CSID can be reached by phone at (800) 368-6498 or by e-mail at askcsid@fema.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

Anticipated Funding Selection Date: **August 27, 2018**

Anticipated Award Date: **No later than September 30, 2018**

Address to Request Application Package

Application forms and instructions are available on Grants.gov (hardcopies of the NOFO and associated application materials are not available.) To access the application package, select “Applicants” then “Apply for Grants” followed by “Get Application Package.” Enter the Funding Opportunity Number located on the first page of this NOFO. Select “Apply” and then “Create Workspace.” Follow the prompts to download the instructions and begin the application.

In addition, the following Telephone Device for the Deaf (TDD) and/or Federal Information Relay Service (FIRS) number available for this Notice is: (800) 462-7585

Initial applications will be processed through the Grants.gov portal and final applications are processed through FEMA’s Non-Disaster Grants ([ND Grants](#)) System.

Content and Form of Application Submission

Applying for an award under this program is a multi-step process. To ensure that an application is submitted on time applicants are advised to start the required steps well in advance of their submission. Failure of an applicant to comply with any of the required steps before the deadline for submitting their application may disqualify their application from funding.

The steps involved in applying for an award under this program are:

1. Applying for, updating, or verifying their Data Universal Numbering System (DUNS) Number and Employer ID Number (EIN);
2. Updating or verifying their System for Award Management (SAM) Registration;
3. Establishing an Authorized Organizational Representative (AOR) in Grants.gov;
4. Submitting an initial application in Grants.gov; and
5. Submitting the final application in the [ND Grants](#) system.

Unique Entity Identifier and System for Award Management (SAM)

All applicants for this award must:

1. Be registered in SAM before submitting its application;

2. Provide a valid DUNS number in its application; and
3. Continue to maintain an active SAM registration with current information at all times during which it has an active federal award or an application or plan under consideration by DHS/FEMA.

DHS/FEMA may not make a federal award to an applicant until the applicant has complied with all applicable DUNS and SAM requirements. If an applicant has not fully complied with the requirements by the time DHS/FEMA is ready to make a federal award, DHS/FEMA may determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

Electronic Delivery

DHS/FEMA is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. DHS/FEMA requires applicants to submit their initial applications online through [Grants.gov](https://www.grants.gov) and their final applications through [ND Grants](https://www.ndgrants.gov).

How to Register to Apply through [Grants.gov](https://www.grants.gov)

1. *Instructions:* Read the instructions below about registering to apply for DHS/FEMA funds. Applicants should read the registration instructions carefully and prepare the information requested before beginning the registration process. Reviewing and assembling the required information before beginning the registration process will alleviate last-minute searches for required information.

The registration process can take up to four weeks to complete. Therefore, registration should be done in sufficient time to ensure it does not impact your ability to meet required application submission deadlines.

Organizations must have a DUNS Number, active SAM registration, and Grants.gov account to apply for grants.

If individual applicants are eligible to apply for this grant funding opportunity, refer to: <https://www.grants.gov/web/grants/applicants/registration.html>

Organization applicants can find complete instructions here: <https://www.grants.gov/web/grants/applicants/organization-registration.html>

2. *Obtain a DUNS Number:* All entities applying for funding, including renewal funding, must have a DUNS number from Dun & Bradstreet (D&B). Applicants must enter the DUNS number in the data entry field labeled "Organizational DUNS" on the SF-424 form.

For more detailed instructions for obtaining a DUNS number, refer to: <https://www.grants.gov/web/grants/applicants/organization-registration/step-1-obtain-duns-number.html>

3. *Register with SAM:* In addition to having a DUNS number, all organizations applying online through Grants.gov must register with the System for Award Management (SAM). Failure to register with SAM will prevent your organization from applying through Grants.gov. SAM registration must be renewed annually.

For more detailed instructions for registering with SAM, refer to:

<https://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html>

4. *Create a Grants.gov Account:* The next step in the registration process is to create an account with Grants.gov. Applicants must know their organization's DUNS number to complete this process.

For more information, follow the on-screen instructions or refer to:

<https://www.grants.gov/web/grants/applicants/registration.html>

5. *Add a Profile to a Grants.gov Account:* A profile in Grants.gov corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant. If you work for or consult with multiple organizations and have a profile for each, you may log in to one Grants.gov account to access all of your grant applications. To add an organizational profile to your Grants.gov account, enter the DUNS Number for the organization in the DUNS field while adding a profile.

For more detailed instructions about creating a profile on Grants.gov, refer to:

<https://www.grants.gov/web/grants/applicants/registration/add-profile.html>

6. *EBiz POC Authorized Profile Roles:* After you register with Grants.gov and create an Organization Applicant Profile, the organization applicant's request for Grants.gov roles and access is sent to the EBiz POC. The EBiz POC will then log in to Grants.gov and authorize the appropriate roles, which may include the AOR role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.

For more detailed instructions about creating a profile on Grants.gov, refer to:

<https://www.grants.gov/web/grants/applicants/registration/authorize-roles.html>

7. *Track Role Status:* To track your role request, refer to:
<https://www.grants.gov/web/grants/applicants/registration/track-role-status.html>

8. *Electronic Signature:* When applications are submitted through Grants.gov, the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The EBiz POC **must** authorize individuals who are able to make legally binding commitments on behalf of the organization as an AOR; **this step is often missed and it is crucial for valid and timely submissions.**

How to Submit an Initial Application to DHS/FEMA via Grants.gov

Grants.gov applicants apply online using Workspace. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different web forms within an application. For each NOFO, you can create individual instances of a Workspace. Initial applications in Grants.gov must be submitted no later than seven days prior to the final application deadline.

Below is an overview of applying on Grants.gov. For access to complete instructions on how to apply for opportunities using Workspace, refer to:

<https://www.grants.gov/web/grants/applicants/workspace-overview.html>

1. *Create a Workspace:* Creating a workspace allows you to complete it online and route it through your organization for review before submitting.
2. *Complete a Workspace:* Add participants to the workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission.
3. *Adobe Reader:* If you decide not to apply by filling out web forms you can download individual PDF forms in Workspace so that they will appear similar to other Standard or DHS/FEMA forms. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, then accessed through Adobe Reader.

NOTE: Visit the Adobe Software Compatibility page on [Grants.gov](https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html) to download the appropriate version of the software at: <https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html>

4. *Mandatory Fields in Forms:* In the forms, you will note fields marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.
5. *Complete SF-424 Fields First:* The forms are designed to fill in common required fields across other forms, such as the applicant name, address, and DUNS number. To trigger this feature, an applicant must complete the SF-424 information first. Once it is completed, the information will transfer to the other forms.
6. *Submit a Workspace:* An application may be submitted through workspace by clicking the “Sign and Submit” button on the Manage Workspace page, under the Forms tab. Grants.gov recommends submitting your application package at least seven days prior to the close date to provide you with time to correct any potential technical issues that may disrupt the application submission.
7. *Track a Workspace:* After successfully submitting a workspace package, a Grants.gov Tracking Number (GRANTXXXXXXXX) is automatically assigned to the application. The number will be listed on the Confirmation page that is generated after submission. Using the

tracking number, access the Track My Application page under the Applicants tab or the Details tab in the submitted workspace.

For additional training resources, including video tutorials, refer to:
<https://www.grants.gov/web/grants/applicants/applicant-training.html>

Applicant Support: Grants.gov provides applicants 24/7 support via the toll-free number 1-800-518-4726 and email at support@grants.gov. For questions related to the specific grant opportunity, contact the number listed in the application package of the grant you are applying for.

If you are experiencing difficulties with your submission, it is best to call the [Grants.gov](#) Support Center and get a ticket number. The Support Center ticket number will assist the DHS/FEMA with tracking your issue and understanding background information on the issue.

Submitting the Final Application in Non Disaster Grants System (ND Grants)

After submitting the initial application in [Grants.gov](#), eligible applicants will be notified by DHS/FEMA and asked to proceed with submitting their complete application package in [ND Grants](#). Applicants can register early with ND Grants and are encouraged to begin their ND Grants registration at the time of this announcement or at the latest, seven days before the application deadline. Early registration will allow applicants to have adequate time to start and complete their application.

In [ND Grants](#) applicants will be prompted to submit all of the information contained in the following forms. Applicants should review these forms before applying to ensure they have all the information required:

- Standard Form 424A, Budget Information (Non-construction)
- Standard Form 424B, Standard Assurances (Non-construction)
- Standard Form LLL, Disclosure of Lobbying Activities

In addition applicants must submit copies of the following in ND Grants:

- Investment Justifications (IJ) from **eligible nonprofits only - one facility per IJ having a physical address not a PO Box Number**;
- Standard Form 424D, Standard Assurances (Construction) if applying for funds to use for construction;
- Standard Form 424C Budget Information (Construction) if applying for funds to use for construction;
- SAA Prioritization of Investment Justifications) in DHS/FEMA-provided template (OMB Control Number: 1660-0110/FEMA Form 089-24).
 - SAAs must submit a Prioritization of Investment Justifications for NSGP-UA and a separate Prioritization of Investment Justifications for NSGP-S
 - Each nonprofit organization must be scored and must have a **unique rank (#1 [one] being the highest ranked through the total number of applications the SAA scored)**

- States with multiple FY 2018 UASI-designated urban areas must ensure that nonprofits are individually ranked within their urban area
- Only eligible nonprofits with complete applications shall be included on the Prioritization of Investment Justifications.
- Indirect Cost Agreement if applicable.

The standard forms can be found here: <http://www.grants.gov/web/grants/forms/sf-424-family.html#sortby=1>

For assistance registering for the [ND Grants](#) system, please contact ndgrants@fema.gov or (800) 865-4076.

Timely Receipt Requirements and Proof of Timely Submission

All applications must be received in [ND Grants](#) by **5:00 PM Eastern Time on June 20, 2018**. Proof of timely submission is automatically recorded by [ND Grants](#). An electronic date/time stamp is generated within the system when the application is successfully received by [ND Grants](#). The applicant with the AOR role who submitted the application will receive an acknowledgement of receipt and a tracking number (GRANTXXXXXXXX) from [Grants.gov](#) with the successful transmission of their initial application. This applicant with the AOR role will also receive the official date/time stamp and [Grants.gov](#) Tracking number in an email serving as proof of their timely submission.

Applicants using slow internet, such as dial-up connections, should be aware that transmission can take some time before [Grants.gov](#) and [ND Grants](#) receive your application. Again, [Grants.gov](#) will provide either an error or a successfully received transmission in the form of an email sent to the applicant with the AOR role. The [Grants.gov](#) Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Please be patient and give the systems time to process the application.

Applicants needing assistance with the [ND Grants](#) system should contact ndgrants@fema.gov or (800) 865-4076.

NSGP Nonprofit Application

As part of the FY 2018 NSGP application, each eligible nonprofit sub-applicant must submit the following three documents to the SAA:

1. NSGP IJ

Each subapplicant must develop a formal IJ that addresses each investment proposed for funding. Security enhancements must be for the locations that the nonprofit occupies at the time of application. The investments or projects described in the IJ must:

- Address an identified risk, including threat and vulnerability, and build or sustain a core capability identified in the Goal;
- Demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA;

- Be both feasible and effective at reducing the risks for which the project was designed;
- Be able to be fully completed within the three-year period of performance; and
- Be consistent with all applicable requirements outlined in the NOFO.

2. *Vulnerability/Risk Assessment*

Each sub-applicant must include its vulnerability/risk assessment on which the request in the IJ is based.

3. *Mission Statement*

Each subapplicant must include its Mission Statement and any mission implementing policies or practices that may elevate the organization's risk. Recognizing the impact an organization's ideology, beliefs, or mission may have on their risk of potential terrorist threats, SAA's will use the Mission Statement along with information provided in the applicant's IJ in order to validate the organization type. The central purpose of the organization described in the Mission Statement will be used to validate the organization type identified in the IJ as one of the following: 1) Ideology-based/Spiritual/Religious; 2) Educational; 3) Medical; or 4) Other.

The organization type is a factor when calculating the final score of the application; see [Section E. Application Review Information – Final Score](#).

The Vulnerability/Risk Assessment and the Mission Statement are **not** to be submitted in ND Grants but should be maintained by the SAA and must be made available to DHS/FEMA upon request.

Applicants will find additional information regarding the NSGP IJ template, DHS/FEMA Form 089-24 (OMB Control Number: 1660-0110), in [Appendix D –NSGP Investment Justification and Scoring Criteria](#).

Funding Restrictions

Federal funds made available through this award may only be used for the purpose set forth in this award and must be consistent with the statutory authority for the award. Award funds may not be used for matching funds for any other Federal award, lobbying, or intervention in Federal regulatory or adjudicatory proceedings. In addition, Federal funds may not be used to sue the Federal Government or any other government entity.

Environmental Planning and Historic Preservation (EHP) Compliance

As a Federal agency, DHS/FEMA is required to consider the effects of its actions on the environment and/or historic properties to ensure that all activities and programs funded by the agency, including grant funded projects, comply with Federal EHP regulations, laws and Executive Orders as applicable. Recipients and subrecipients proposing projects that have the potential to impact the environment, including but not limited to construction of communication towers, modification or renovation of existing buildings, structures and facilities, or new construction including replacement of facilities, must participate in the DHS/FEMA EHP review process. The EHP review process involves the submission of a detailed project description along

with supporting documentation so that DHS/FEMA may determine whether the proposed project has the potential to impact environmental resources and/or historic properties. In some cases, DHS/FEMA is also required to consult with other regulatory agencies and the public in order to complete the review process. The EHP review process must be completed before funds are released to carry out the proposed project; otherwise DHS/FEMA may not be able to fund the project due to non-compliance with EHP laws, executive orders, regulations, and policies.

Additionally, all recipients are required to comply with DHS/FEMA EHP Policy Guidance FEMA Policy #108-023-1. The EHP screening form is located [here](#) and further EHP guidance can be found at <https://www.fema.gov/media-library/assets/documents/85376>.

Emergency Communications and Resilience

All entities using NSGP funding to support emergency communications investments are required to comply with the [SAFECON Guidance on Emergency Communications Grants \(SAFECON Guidance\)](#). The SAFECON Guidance provides current information on emergency communications policies, eligible costs, best practices, and technical standards for State, local, tribal, and territorial grantees investing Federal funds in emergency communications projects. It is also designed to promote and align with the [National Emergency Communications Plan \(NECP\)](#). Conformance with the SAFECON Guidance helps ensure that Federally-funded investments are compatible, interoperable, resilient, and support national goals and objectives for improving emergency communications.

Pre-award Costs

Pre-award costs are allowable only with the prior written approval of DHS/FEMA and if they are included in the award agreement. To request pre-award costs a written request must be included with the application and signed by the Representative of the entity. The letter must outline what the pre-award costs are for, including a detailed budget break-out of pre-award costs from the post-award costs, and a justification for approval.

Cost Principles

Costs charged to this award must be consistent with the Cost Principles for Federal Awards located at 2 C.F.R. Part 200, Subpart E.

Direct Costs

Planning

Planning related costs are allowed under this program only as described in this NOFO.

Organization

Organization related costs are not allowed under this program.

Equipment

Equipment related costs are allowed under this program only as described in this NOFO.

Applicants should analyze the cost benefits of purchasing versus leasing equipment, especially high cost items and those subject to rapid technical advances. Large equipment

purchases must be identified and explained. For more information regarding property management standards for equipment, please reference 2 C.F.R. § 200.313, located at http://www.ecfr.gov/cgi-bin/text-idx?SID=c836a011886f180dac489e15c059b1aa&node=sg2.1.200_1309.sg2&rgn=div7.

Training

Training related costs are allowed under this program only as described in this NOFO.

Exercises

Exercise related costs are allowed under this program.

Travel

Travel costs are not allowed under this program.

Construction and Renovation

Construction and renovation costs are allowed under this program only as described in this NOFO.

Operational Overtime

Operational Overtime costs are not allowed under this program.

Maintenance and Sustainment

Maintenance and Sustainment related costs, such as maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable as described in DHS/FEMA Policy FP 205-402-125-1 (<https://www.fema.gov/media-library/assets/documents/32474>).

For additional details on allowable costs under the NSGP, see [Appendix C – Funding Guidelines](#) of this NOFO.

Management and Administration (M&A) Costs

M&A are costs for activities directly related to the management and administration of the award. M&A costs are allowed under this program as described below.

NSGP-UA (recipient) M&A:

The NSGP-UA is a sub-component of the UASI program and states must ensure that 100 percent (100%) of each individual NSGP-UA award is passed through to the nonprofit organizations awarded funding by DHS/FEMA.

The state may use UASI funding for M&A purposes associated with administering the NSGP-UA award. However, the state's overall M&A withholding for the NSGP-UA and UASI programs may not exceed five percent (5%) of the sum total of the state's combined UASI and NSGP-UA awards.

NSGP-S (recipient) M&A:

The NSGP-S is a sub-component of the State Homeland Security Program and states must ensure that 100 percent (100%) of each individual NSGP-S award is passed through to the nonprofit organizations awarded funding by DHS/FEMA.

The state may use SHSP funding for M&A purposes associated with administering the NSGP-S award. However, the state's overall M&A withholding for the NSGP-S and SHSP programs may not exceed five percent (5%) of the sum total of the state's combined SHSP and NSGP-S awards.

Note: States must be able to separately account for M&A costs associated the NSGP-UA from NSGP-S.

Nonprofit (subrecipient) M&A:

Nonprofit organizations that receive a subaward under this program may use and expend up to five percent (5%) of their FY 2018 NSGP funds for M&A purposes associated with the subaward.

M&A activities are those defined as directly relating to the management and administration of NSGP funds, such as financial management and monitoring. Management and administrative expenses must be based on actual expenses or known contractual costs. Requests that are simple percentages of the award, without supporting justification, will not be allowed or considered for reimbursement.

M&A costs are not operational costs, they are the necessary costs incurred in direct support of the grant or as a consequence of the grant and should be allocated across the entire lifecycle of the grant. Examples include preparing and submitting required programmatic and financial reports, establishing and/or maintaining equipment inventory, documenting operational and equipment expenditures for financial accounting purposes; and responding to official informational requests from state and federal oversight authorities.

Indirect (Facilities & Administrative [F&A]) Costs

Indirect costs are allowable under this program as described in 2 C.F.R. § 200.414. With the exception of recipients who have never received a negotiated indirect cost rate as described in 2 C.F.R. § 200.414(f), recipients must have an approved indirect cost rate agreement with their cognizant Federal agency to charge indirect costs to this award. A copy of the approved rate (a fully executed, agreement negotiated with the applicant's cognizant Federal agency) is required at the time of application and must be provided to DHS/FEMA before indirect costs are charged to the award. See [Appendix C - Funding Guidelines](#) for additional details.

E. Application Review Information

Application Evaluation Criteria

Prior to making a Federal award, FEMA is required by 31 U.S.C. § 3321 and 41 U.S.C. § 2313 to review information available through any OMB-designated repositories of government-wide eligibility qualification or financial integrity information. Therefore application evaluation

criteria may include the following risk based considerations of the applicant: (1) financial stability; (2) quality of management systems and ability to meet management standards; (3) history of performance in managing Federal award; (4) reports and findings from audits; and (5) ability to effectively implement statutory, regulatory, or other requirements.

FY 2018 NSGP applications are to be submitted by nonprofit organizations to their respective SAA. FY 2018 NSGP-UA applications will be reviewed through a two-phased 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. FY 2018 NSGP-S applications will be reviewed by the SAA for eligibility, completeness, adherence to programmatic guidelines, feasibility, and how well the IJ (project description and justification) addresses the identified risk. The SAA will make recommendations to DHS/FEMA, and FEMA HQ Program Analysts will review the recommended IJs to ensure that proposed investments are allowable.

Criteria

The following are FY 2018 NSGP evaluation criteria:

- For NSGP-UA only: State and Federal verification that the nonprofit organization is located within one of the FY 2018 UASI-designated urban areas, listed in [Appendix A – FY 2018 NSGP UASI-designated urban areas](#).
- Identification and substantiation of current or persistent threats or attacks (from within or outside the U.S.) by a terrorist organization, network, or cell against the applicant based on their ideology, beliefs, or mission
- Symbolic value of the site(s) as a highly recognized regional and/or national or historical institution(s) that renders the site a possible target of terrorism
- Role of the applicant nonprofit organization in responding to or recovering from terrorist attacks
- Findings from previously conducted threat and/or vulnerability assessments
- Integration of nonprofit preparedness with broader state and local preparedness efforts
- Complete and feasible IJ that addresses an identified risk, including the assessed threat, vulnerability, and consequence of the risk, and proposes building or sustaining a core capability identified in the Goal
- For NSGP-UA only: History of prior funding under NSGP. Not having received prior year funding is a positive factor when calculating the state score of the application; see [Section E. Application Review Information – Review and Selection Process](#) for additional information.

For complete information on the criteria used to review and score IJs at the state and Federal levels, please refer to [Appendix D – NSGP Investment Justification and Scoring Criteria](#).

Grant projects must be: 1) both feasible and effective at reducing the risks for which the project was designed; and 2) able to be fully completed within the 3-year period of performance.

DHS/FEMA will use the information provided in the application, as well as any supporting documentation, to determine the feasibility and effectiveness of the grant project. Information that would assist in the feasibility and effectiveness determination includes the following:

- Scope of work (purpose and objectives of the project, identification of what is being protected)
- Desired outcomes, including expected long-term impact where applicable
- Summary of status of planning and design accomplished to date (e.g. included in a capital improvement plan)
- Project schedule

Recipients (and subrecipients) are expected to conform, as applicable, with accepted engineering practices, established codes, standards, modeling techniques, and best practices.

Review and Selection Process (NSGP-UA)

State Review

Application packages are submitted by the nonprofit organization to the SAA and the UAWG based on the established criteria.

As part of the State Review, the SAAs must:

- Conduct an eligibility review, in coordination with the UAWG;
- Verify that the nonprofit is located within a FY 2018 UASI-designated urban area;
- Review and score all complete application packages (including mission statements and vulnerability assessments) using the NSGP Scoring Worksheet provided by DHS/FEMA; see [Appendix E – NSGP Investment Justification Scoring Worksheet](#); **Note:** A bonus point will be added to the state score for all organizations that have not received NSGP funding in previous years; this will be the final state score;
- Validate the organization type listed in the IJ by assessing the central purpose of the organization described in the Mission Statement, as either 1) Ideology-based/Spiritual/Religious; 2) Educational; 3) Medical; or 4) Other; and
- Prioritize all NSGP IJs by ranking each IJ. Each IJ will receive a **unique rank** (#1 [one] being the highest ranked through the total number of applications the SAA scored).
- Submit the scores from the state review along with the prioritized list of all NSGP projects to DHS/FEMA using the SAA Prioritization Tracker.
- Retain the mission statements and vulnerability assessments submitted by each nonprofit organization.

The SAA will base the ranking on the SAA's subject matter expertise and discretion with consideration to the following factors:

- **Need:** The relative need for the nonprofit organization compared to the other applicants; and
- **Impact:** The feasibility of the proposed project and how effectively the proposed project addresses the identified need.

Federal Review (NSGP-UA)

The highest-scoring IJs from each submitting urban area (at least one from each urban area) are reviewed by a panel made up of DHS/FEMA HQ Program Analysts and Regional Program Analysts or Grants Management Specialists. Federal staff will verify that the nonprofit is located

within a FY 2018 UASI designated urban area. Two Federal reviewers will score each IJ using the NSGP Investment Justification Scoring Worksheet.

Determining the number of applications that will advance to the Federal Review:

- 1) FEMA will organize applications in rank order (based on the state scores) from highest to lowest score.
- 2) Federal reviewers will come up with the federal review pool by reviewing the highest scored projects equal to 150% of the available funding, which is \$75 million this year. At least one IJ from each submitting urban area will be included as part of the federal review pool.

Final Score (NSGP-UA)

To calculate an application's final score, the sum of the applicant's state score and the average of the two Federal reviewers' scores will be multiplied:

- By a factor of three for nonprofit groups that are at a high risk of terrorist attacks due to their ideology, beliefs, or mission;
- By a factor of two for medical and educational institutions; and
- By a factor of one for all other nonprofit organizations.

All final application scores will then be sorted in descending order, regardless of urban area, and applicants will be selected from highest to lowest until available FY 2018 NSGP funding has been exhausted. In the event of a tie during the funding determination process, priority will be given to nonprofit organizations that have not received prior year funding, then those ranked highest by their SAA.

DHS/FEMA will use the final results to make funding recommendations to the Secretary of Homeland Security. 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.

Review and Selection Process (NSGP-S)

State Review

Application packages are submitted by the nonprofit organization to the SAA based on the established criteria.

The SAA will review applications and recommend to FEMA/DHS which nonprofit organizations should be selected for funding. As part of the State Review, the SAAs must:

- Conduct an eligibility review;
- Review and score all **complete** application packages (including and vulnerability assessments) using the NSGP Scoring Worksheet provided by DHS/FEMA; see [Appendix E – NSGP Investment Justification Scoring Worksheet](#);
- Prioritize all NSGP IJs by ranking each IJ. Each IJ will receive a **unique rank** (#1 [one] being the highest ranked through the total number of applications the SAA scored).

- Submit to DHS/FEMA the prioritized list of recommendations using the SAA Prioritization of Investment Justification form.
- SAAs must submit IJs with a total requested funding amount of the state NSGP-S allocation plus \$300,000 or plus three additional IJs whichever is greater. This will allow DHS/FEMA to award the next prioritized IJ in instances when a significant portion of an IJ includes proposed projects that are unallowable.

For Example,

<u>State Allocation</u>	<u>Submit IJs Totaling Below Amount to DHS/FEMA</u>
\$100,000	\$400,000
\$150,000	\$450,000
\$200,000	\$500,000
\$250,000	\$550,000
\$300,000	\$600,000
\$400,000	\$700,000

- Retain the vulnerability assessments submitted by each nonprofit organization.

The SAA will base its recommendations on the SAA's subject matter expertise and discretion with consideration to the following factors:

- **Need:** The relative need for the nonprofit organization compared to the other applicants; and
- **Impact:** The feasibility of the proposed project and how effectively the proposed project addresses the identified need.

Federal Review (NSGP-S)

DHS/FEMA HQ Program Analysts will review the IJs recommended by the SAA to ensure that all proposed investments are allowable. DHS/FEMA will select nonprofits for funding as prioritized by the SAA unless proposed projects are unallowable. If recommended IJs include unallowable projects, DHS/FEMA will decide to either partially fund the IJ or select the next prioritized IJ.

Should additional NSGP-S funding remain unobligated after reviewing all State submissions, FEMA will use the SAA scores, in part, to determine how the remaining balance of funds will be allocated. Submissions will be selected for funding until the remaining balance of funds is exhausted.

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.

Financial Review

DHS/FEMA HQ Grants Management Specialists will conduct a financial risk assessment using the following criteria:

- Allowability, allocability, and financial reasonableness of the proposed budget and investment information.
- Whether the recipient meets the financial and legal requirements listed in 2 C.F.R. Part 200.

Prior to making a Federal award with a total amount of Federal share greater than the simplified acquisition threshold, currently \$150,000, DHS/FEMA is required to review and consider any information about the applicant that is in the designated integrity and performance system accessible through SAM (currently FAPIIS).

An applicant, at its option, may review information in the designated integrity and performance systems accessible through SAM and comment on any information about itself that a Federal awarding agency previously entered and is currently in the designated integrity and performance system accessible through SAM.

DHS/FEMA will consider any comments by the applicant, in addition to the other information in the designated integrity and performance system, in making a judgment about the applicant's integrity, business ethics, and record of performance under Federal awards when completing the review of risk posed by applicants as described in 2 C.F.R. § 200.205 Federal awarding agency review of risk posed by applicants.

F. Federal Award Administration Information

Notice of Award

Notification of award approval is made through the ND Grants system through an automatic e-mail to the awardee point of contact (the "authorized official") listed in the initial application. The "award date" for NSGP will be the date that DHS/FEMA approves the award. The recipient should follow the directions in the notification to confirm acceptance of the award.

Funds will remain on hold until the recipient accepts the award through the ND Grants system and all other conditions of award have been satisfied, or the award is otherwise rescinded. Failure to accept the grant award within the 90 day timeframe may result in a loss of funds.

Recipients must accept their awards no later than 90 days from the award date. The recipient shall notify the awarding agency of its intent to accept and proceed with work under the award through the ND Grants system. Instructions on how to accept or decline an award in the ND Grants system is in the [ND Grants Grantee Training Manual](#).

Administrative and National Policy Requirements

All successful applicants for all DHS grant and cooperative agreements are required to comply with DHS Standard Administrative Terms and Conditions, which are available online at: [DHS Standard Terms and Conditions](#).

The applicable DHS Standard Administrative Terms and Conditions will be those in effect at the time the award was made.

Before accepting the award the AOR should carefully review the award package. The award package includes instructions on administering the grant award and the terms and conditions associated with responsibilities under Federal Awards. Recipients must accept all conditions in this NOFO as well as any Special Terms and Conditions in the Notice of Award to receive an award under this program.

Pass-through Funding Requirements

Pass-through funding is required under this program.

Awards made to the SAA for the FY 2018 NSGP carry additional pass-through requirements. Pass-through is defined as an obligation on the part of the state to make subawards to selected nonprofit organizations. The SAA must provide 100 percent (100 %) of funds awarded under NSGP to successful nonprofit applicants within 45 days of receipt of the funds. A letter of intent (or equivalent) to distribute funds is not sufficient. Award subrecipients that are selected for funding under this program must be provided with funding within 45 days from the date the funds are first made available to the recipient so that they can initiate implementation of approved investments.

For the SAA to successfully meet the pass-through requirement and provide funding to the subrecipients, the SAA must meet the following four requirements:

- There must be some action by the SAA to establish a firm commitment to award the funds to the selected nonprofit organization;
- The action must be unconditional on the part of the SAA (i.e., no contingencies for availability of SAA funds);
- There must be documentary evidence of the commitment of the award of funding to the selected nonprofit organization; and
- The SAA must communicate the terms of the subaward to the selected nonprofit organization.

If a nonprofit organization is selected for a FY 2018 NSGP award and elects to decline the award, the SAA must notify their HQ Program Analyst. The SAA may not re-obligate to another subrecipient without prior approval.

Reporting

Recipients are required to submit various financial and programmatic reports as a condition of award acceptance. Future awards and fund drawdowns may be withheld if these reports are delinquent.

Federal Financial Reporting Requirements

Federal Financial Report (FFR)

Recipients must report obligations and expenditures on a quarterly basis through the FFR (SF-425) to DHS/FEMA. Recipients must file the FFR electronically using the [Payment and Reporting Systems \(PARS\)](#). A FFR must be submitted quarterly throughout the period of performance, including partial calendar quarters, as well as for periods where no grant award activity occurs. The final FFR is due 90 days after the end of the performance period. Future

awards and fund drawdowns may be withheld if these reports are delinquent, demonstrate lack of progress, or are insufficient in detail.

The Federal Financial Reporting Form (FFR) is available online at:

<https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html#sortby=1>, SF-425 OMB #4040-0014.

Financial Reporting Periods and Due Dates

The following reporting periods and due dates apply for the FFR:

Reporting Period	Report Due Date
October 1 – December 31	January 30
January 1 – March 31	April 30
April 1 – June 30	July 30
July 1 – September 30	October 30

Financial and Compliance Audit Report

For audits of fiscal years beginning on or after December 26, 2014, recipients that expend \$750,000 or more from all Federal funding sources during their fiscal year are required to submit an organization-wide financial and compliance audit report. The audit must be performed in accordance with the requirements of Government Accountability Office's (GAO) Government Auditing Standards, located at <http://www.gao.gov/govaud/ybk01.htm>, and the requirements of Subpart F of 2 C.F.R. Part 200, located at https://www.ecfr.gov/cgi-bin/text-idx?SID=408661e2ab32a5312f29042d33a66028&mc=true&tpl=/ecfrbrowse/Title02/2cfrv1_02.tpl#200.

Program Performance Reporting Requirements

Performance Progress Reports (PPR)

Recipients will be required to report on progress towards implementing projects described in their application on a biannual basis.

Program Performance Reporting Periods and Due Dates

The following reporting periods and due dates apply for the PPR:

Reporting Period	Report Due Date
January 1 – June 30	July 30
July 1 – December 31	January 30

Biannual Strategy Implementation Reports (BSIR)

In addition to the quarterly financial and biannual performance progress reports, recipients are responsible for completing and submitting summer and winter BSIRs in the Grants Reporting Tool (GRT). The BSIR is due within 30 days after the end of the reporting period (July 30 for the reporting period of January 1 through June 30 (the summer BSIR report); and January 30 for the reporting period of July 1 through December 31 (winter BSIR report).

The Grants Reporting Tool (GRT) is the system in which NSGP recipients will submit their BSIR information. Recipients should go to the following link and follow the links to create a new account as needed: <https://www.reporting.odp.dhs.gov/>. This report is used to track the progress toward the completion of projects.

Closeout Reporting Requirements

DHS/FEMA will close out the grant award when it determines that all applicable administrative actions and all required work of the NSGP award have been completed by the recipient. This section summarizes the actions that the recipient must take to complete the closeout process in accordance with 2 C.F.R. § 200.343 at the end of the grant's period of performance or the issuance of a Grant Amendment Notice issued to close out the grant.

Within 90 days after the end of the period of performance, or after an amendment has been issued to close out a grant, whichever comes first, recipients must submit a final FFR and final progress report detailing all accomplishments and a qualitative summary of the impact of those accomplishments throughout the period of performance, as well as the following documentation:

- 1) Final request for payment, if applicable;
- 2) SF-425 – Final Federal Financial Report;
- 3) Final Performance Progress Report;
- 4) A qualitative summary of the impact of accomplishments throughout the entire period of performance. This summary is submitted to the respective FEMA HQ Program Analyst in a Word document; and
- 5) Other documents required by program guidance or terms and conditions of the award.

Additionally, the recipient must liquidate all obligations incurred under the NSGP award no later than 90 calendar days after the end date of the period of performance or issuance of a Grant Amendment Notice that closes out the award, whichever comes first. If recipients fails to liquidate their obligations within this time period, DHS/FEMA may disallow the costs associated with those unliquidated obligations disallowed. Recipients also are responsible for promptly returning to DHS/FEMA the balance of any funds that have been drawn down, but remain unliquidated.

After final reports have been reviewed and approved by DHS/FEMA, a closeout notice will be completed. The notice will indicate the period of performance as closed, list any remaining funds the recipient has not drawn down that will be deobligated, and address requirements for record retention, and disposition and reporting requirements for any equipment or real property purchased using NSGP funding.

In addition, NSGP state-level recipients are responsible for closing out all subawards made to individual nonprofits as described in 2 C.F.R. § 200.343. Recipients must ensure that they complete the closeout of these subawards in time to submit all necessary documentation and information to DHS/FEMA during the closeout of their own grant award.

Disclosing Information Per 2 C.F.R. § 180.335

This reporting requirement pertains to disclosing information related to government-wide

suspension and debarment requirements. Before a recipient enters into a grant award with FEMA, the recipient must notify FEMA if it knows if any of the recipient's principals under the award fall under one or more of the four criteria listed at 2 C.F.R. § 180.335. At any time after accepting the award, if the recipient learns that any of its principals falls under one or more of the criteria listed at 2 C.F.R. § 180.335, the recipient must provide immediate written notice to FEMA in accordance with 2 C.F.R. § 180.350.

**G. DHS/FEMA Awarding Agency Contact Information
Contact and Resource Information**

Centralized Scheduling and Information Desk (CSID)

CSID is a non-emergency comprehensive management and information resource developed by DHS/FEMA for grants stakeholders. CSID provides general information on all DHS/FEMA grant programs and maintains a comprehensive database containing key personnel contact information at the Federal, state, and local levels. When necessary, recipients will be directed to a Federal point of contact who can answer specific programmatic questions or concerns. CSID can be reached by phone at (800) 368-6498 or by e-mail at askcsid@fema.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m.ET.

GPD Grant Operations Division

GPD's Grant Operations Division Business Office provides support regarding financial matters and budgetary technical assistance. Additional guidance and information can be obtained by contacting the DHS/FEMA Call Center at (866) 927-5646 or via e-mail to ASK-GMD@fema.gov.

FEMA Regional Offices

DHS/FEMA Regional Offices also may provide fiscal support, including pre- and post-award administration and technical assistance such as conducting cash analysis, financial monitoring, and audit resolution to the grant programs included in this solicitation. GPD will provide programmatic support and technical assistance. FEMA Regional Office contact information is available [here](#).

GPD Environmental Planning and Historic Preservation (GPD EHP)

The FEMA GPD EHP Team provides guidance and information about the EHP review process to recipients and subrecipients. All inquiries and communications about GPD projects or the EHP review process, should be sent to gpdehpinfo@fema.gov. EHP Technical Assistance, including the EHP Screening Form, can be found [online](#).

Systems Information

Grants.gov

For technical assistance with [Grants.gov](#), please call the [Grants.gov](#) customer support hotline at (800) 518-4726.

Non-Disaster (ND) Grants

For technical assistance with the ND Grants system, please contact ndgrants@fema.gov or (800) 865-4076, Monday through Friday 9:00 a.m. to 6:00 p.m. ET.

Payment and Reporting System

DHS/FEMA utilizes the DHS/FEMA [Payment and Reporting System \(PARS\)](#) for financial reporting, invoicing and tracking payments.

DHS/FEMA uses the Direct Deposit/Electronic Funds Transfer (DD/EFT) method of payment to recipients. To enroll in the DD/EFT, the recipients must complete a Standard Form 1199A, Direct Deposit Form.

H. Additional Information

National Preparedness

DHS/FEMA coordinates with local, state, tribal, and territorial governments as well as the private and nonprofit sectors to facilitate whole community, risk driven, and capabilities-based approach to preparedness. This approach is grounded in the identification and assessment of risk through the Threat and Hazard Identification and Risk Assessment (THIRA). For additional information on THIRA, please refer to the following website: <http://www.fema.gov/threat-and-hazard-identification-and-risk-assessment>. Urban Areas and States must maintain and update their THIRAs, and States their Stakeholder Preparedness Review, annually to ensure that the community's shared understanding of risk evolves to account for changes in the risk landscape, including successful mitigation efforts, emerging threats, hazards, and associated consequences. Information on the National Preparedness System can be found at <https://www.fema.gov/national-preparedness-system>. Additional details regarding how the National Preparedness System is supported by the NSGP can be found in [Appendix B – NSGP Priorities - Program Specific Priorities](#).

Active Shooter Preparedness

DHS aims to enhance national preparedness through a whole community approach by providing the necessary products, tools, and resources to help all stakeholders prepare for and respond to an active shooter incident. To that end, DHS has developed a comprehensive “Active Shooter Preparedness” website, which includes a variety of informational resources. The website address is: <https://www.dhs.gov/active-shooter-preparedness>.

In addition, within the Homeland Security Information Network (HSIN), the Joint DHS and FBI Countering Violent Extremism (CVE) and Active Shooter Web Portal provides a restricted-access forum to share Unclassified For Official Use Only (FOUO), Sensitive but Unclassified (SBU), and Law Enforcement Sensitive (LES) Information. The portal provides users and training practitioners with accurate, appropriate, and relevant CVE and Active Shooter training development resources, subject matter expert information, and outreach initiatives. It also has forums to provide feedback, products useful to others, and allows participants to ask questions concerning CVE or the Active Shooter Program. Persons with a job-related duty, public service interest, or who support a CVE and/or Active Shooter program can request access into this Portal. Additional information can be found on the DHS website at: <https://www.dhs.gov/cveas-portal#>.

Nonprofit organizations are encouraged to review the referenced active shooter guidance, evaluate their preparedness needs, and consider applying for NSGP funding to address any needs identified in this area (see [Appendix C – Funding Guidelines](#) for allowable costs). To address

training needs associated with active shooter incidents, DHS/FEMA's Emergency Management Institute provides a free, web-based training course entitled *IS-907: Active Shooter: What You Can Do*, available at the following website:

<https://training.fema.gov/is/courseoverview.aspx?code=IS-907>.

Soft Targets and Crowded Places

There are continued and growing threats facing Soft Targets and Crowded Places (ST-CP) throughout the nation. ST-CPs are those locations or environments that are easily accessible to large numbers of people on a predictable or semi-predictable basis that have limited security or protective measures in place. These locations are vulnerable to attack using simple tactics and readily accessible weapons such as small arms, edged weapons, and vehicles as a weapon, improvised explosive devices, and unmanned aerial systems. ST-CPs can include places such as town centers, shopping malls, open-air venues, outside hard targets/venues perimeters, and other places of meeting and gathering. DHS is committed to reducing the risk of attacks against ST-CPs and the impact of attacks if they do occur. However, the protection and security of ST-CPs is a shared responsibility among whole community partners including: the public, ST-CP owners and operators, security industry partners, the Federal Government, and State, local, tribal, and territorial (SLTT) government partners. States, territories, urban areas, and public and private sector partners are encouraged to identify security gaps and build capabilities that address security needs of ST-CP, understanding the unique challenges related to protecting locations that are open to the public. States, territories, urban areas, and public and private sector partners are also encouraged to use resources to instill a culture of awareness, vigilance, and preparedness. For more information and additional resources please see the Department of Homeland Security's (DHS's) [Hometown Security Program](#).

Protecting Houses of Worship and Public Venues

Across the United States, Americans congregate in faith-based venues to worship, learn, play, and bond as a community. However, public gatherings are vulnerable, and adversaries may perceive houses of worship as attractive targets where they can inflict mass casualties, cause substantial psychological impacts, and draw extensive media coverage. The Department of Homeland Security Center for Faith-Based & Neighborhood Partnerships (DHS Center) partners with interagency and whole community partners to offers numerous resources to assist faith-based and community organizations with their efforts to prepare for all types of hazards, whether natural or man-made. Technical assistance is provided through presentations, workshops, training, webinars, tabletop exercises, and training. Access to these free resources can be found at www.fema.gov/faith-resources.

Monitoring and Evaluation

Recipients will be monitored on an annual and as needed basis by DHS/FEMA staff, both programmatically and financially, to ensure that the project goals, objectives, performance requirements, timelines, milestone completion, budgets, and other related program criteria are being met.

Monitoring may be accomplished through either a desk-based review or on-site monitoring visits, or both. Monitoring will involve the review and analysis of the financial, programmatic, performance, compliance and administrative processes, policies, activities, and other attributes of

each Federal assistance award and will identify areas where technical assistance, corrective actions, and other support may be needed.

As part of its grant oversight responsibility, FEMA is conducting a series of grant effectiveness case studies jointly with grant recipients to highlight how states and urban areas have used federal grants to improve preparedness. The purpose of the project is to better understand the factors that grant recipients consider when determining which grant projects to fund, understand how recipients measure grant effectiveness, and document key findings and success stories that will help both grant recipients and FEMA more effectively communicate the importance of Federal grant programs to policymakers and the public. Although not mandatory, recipients are encouraged to participate given the mutual benefits to be gained from this collaborative effort.

Conflicts of Interest in the Administration of Federal Awards or Subawards

For conflicts of interest under grant-funded procurements and contracts, please refer to the [Section H](#) on Procurement Integrity in this NOFO and 2 C.F.R. §§ 200.317 – 200.326.

To eliminate and reduce the impact of conflicts of interest in the subaward process, recipients and pass-through entities must follow their own policies and procedures regarding the elimination or reduction of conflicts of interest when making subawards. Recipients and pass-through entities are also required to follow any applicable state, local, or tribal statutes or regulations governing conflicts of interest in the making of subawards.

The recipient or pass-through entity must disclose to DHS/FEMA, in writing, any real or potential conflict of interest as defined by the Federal, state, local, or tribal statutes or regulations or their own existing policies that may arise during the administration of the Federal award. Recipients and pass-through entities must disclose any real or potential conflicts to Program Analyst within five days of learning of the conflict of interest. Similarly, subrecipients must disclose any real or potential conflict of interest to the pass-through entity as required by the recipient's conflict of interest policies, or any applicable state, local, or tribal statutes or regulations.

Conflicts of interest may arise during the process of DHS/FEMA making a Federal award in situations where an employee, officer, or agent, any members of his or her immediate family, his or her partner has a close personal relationship, a business relationship, or a professional relationship, with an applicant, subapplicant, recipient, subrecipient, or DHS/FEMA employees.

Investment Modifications

NSGP is competitive, with applications recommended for funding based on the threat, vulnerability, and consequence to a specific facility/location. As a result, any change in scope of the grant-funded activity after the award is made has the potential to negatively impact the competitive process used to recommend NSGP awards. DHS/FEMA will generally not approve FY 2018 NSGP change of scope requests resulting from the following situations:

- Subrecipients that relocate their facilities after submitting their application who are requesting a change of scope to allow them to use NSGP funds towards projects at the new facility; or

- Subrecipients that renovate their facilities after submitting their application in cases where the subsequent renovations would affect the vulnerability/risk assessment upon which the IJ is based.

Furthermore, FY 2018 NSGP project funding is based on the ability of the proposed project to mitigate the risk factors identified in the IJ. For this reason, DHS/FEMA may reject requests to significantly change the physical security enhancements that are purchased with FY 2018 NSGP funding where DHS/FEMA believes approval of the request would change or exceed the scope of the originally approved project. DHS/FEMA will consider all requests to deviate from the security project as originally proposed on a case by case basis.

Extensions

Period of Performance Extensions

Extensions to this program are allowed. Extensions to the initial period of performance identified in the award will only be considered through formal, written requests to the recipient's FEMA HQ Program Analyst and must contain specific and compelling justifications as to why an extension is required. SAAs are advised to coordinate with the FEMA HQ Program Analyst as needed, when preparing an extension request. All extension requests must address the following:

- 1) Grant program, fiscal year, and award number;
- 2) Reason for delay – this must include details of the legal, policy, or operational challenges being experienced that prevent the final outlay of awarded funds by the applicable deadline;
- 3) Current status of the activity/activities;
- 4) Approved period of performance termination date and new project completion date;
- 5) Amount of funds drawn down to date;
- 6) Remaining available funds, both Federal and non-Federal;
- 7) Budget outlining how remaining Federal and non-Federal funds will be expended;
- 8) Plan for completion, including milestones and timeframes for achieving each milestone and the position/person responsible for implementing the plan for completion; and
- 9) Certification that the activity/activities will be completed within the extended period of performance without any modification to the original Statement of Work, as described in the investment justification and approved by DHS/FEMA.

Extension requests will be granted only due to compelling legal, policy, or operational challenges. Extension requests will only be considered for the following reasons:

- Contractual commitments by the grant sub-recipient with vendors or sub-recipients prevent completion of the project within the existing period of performance;
- The project must undergo a complex environmental review that cannot be completed within the existing Period of Performance;
- Projects are long-term by design and therefore acceleration would compromise core programmatic goals; and

- Where other special circumstances exist.

Recipients must submit all proposed extension requests to DHS/FEMA for review and approval no later than 120 days prior to the end of the period of performance. In accordance with GPD policy, extensions are typically granted for no more than a six month time period.

Procurement Integrity

Through audits conducted by DHS Office of Inspector General (OIG) and FEMA grant monitoring, findings have shown that some FEMA recipients have not fully adhered to the proper procurement requirements when spending grant funds. Anything less than full compliance with Federal procurement policies jeopardizes the integrity of the grant as well as the grant program. Noncompliance with the Federal procurement rules may result in FEMA imposing specific conditions as described in 2 C.F.R. § 200.207 or other remedies for noncompliance under 2 C.F.R. § 200.338.

The below highlights the Federal procurement requirements for FEMA recipients when procuring goods and services with Federal grant funds. DHS will include a review of recipients' procurement practices as part of the normal monitoring activities. All procurement activity must be conducted in accordance with Federal Procurement Standards at 2 C.F.R. §§ 200.317 – 200.326. Select requirements under these standards are listed below. The recipient must comply with all requirements, even if they are not listed below.

Under 2 C.F.R. § 200.317, when procuring property and services under a Federal award, states must follow the same policies and procedures they use for procurements from their non-Federal funds; additionally, states must follow 2 C.F.R. § 200.322 regarding procurement of recovered materials, and 2 C.F.R. § 200.326 regarding required contract provisions.

All other non-Federal entities, such as tribes, must use their own documented procurement procedures which reflect applicable state, local, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in 2 C.F.R. Part 200. These standards include, but are not limited to providing for full and open competition consistent with the standards of 2 C.F.R. § 200.319.

Competition and Conflicts of Interest

Among the requirements of 2 C.F.R. § 200.319(a) applicable to all non-Federal entities other than States, in order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. FEMA considers this an organizational conflict of interest and interprets this restriction as applying to contractors that help a recipient develop its grant application, project plans, or project budget. This prohibition also applies to the use of former employees to manage the grant or carry out a contract when such former employees worked on such activities while they were employees of the non-Federal entity.

Under this prohibition, unless the non-Federal entity solicits for and awards a contract covering both development and execution of specifications (or similar elements as described above), and this contract was procured in compliance with 2 C.F.R. §§ 200.317 – 200.326,

Federal funds cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of such specifications. This rule applies to all contracts funded with Federal grant funds, including pre-award costs, such as grant writer fees, as well as post-award costs, such as grant management fees. For more information on grant writer and grant management costs, see Section D.

Additionally, some of the situations considered to be restrictive of competition include, but are not limited to:

- Placing unreasonable requirements on firms in order for them to qualify to do business.
- Requiring unnecessary experience and excessive bonding.
- Noncompetitive pricing practices between firms or between affiliated companies.
- Noncompetitive contracts to consultants that are on retainer contracts.
- Organizational conflicts of interest.
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement.
- Any arbitrary action in the procurement process.

Pursuant to 2 C.F.R. § 200.319(b), non-Federal entities other than states must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

Pursuant to 2 C.F.R. § 200.318(c)(1), non-Federal entities other than states are required to maintain written standards of conduct covering conflicts of interest and governing the actions of their employees engaged in the selection, award, and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such conflicts of interest would arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

If the recipient or subrecipient (other than states) has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. In this context, organizational conflict of interest means that because of a relationship with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. The non-Federal entity must disclose in writing any potential conflicts of interest to FEMA or the pass-through entity in accordance with applicable FEMA policy.

Supply Schedules

Generally, a non-Federal entity may seek to procure goods or services from a Federal supply schedule, state supply schedule, or group purchasing agreement. State and local governments may procure goods and services from a General Services Administration (GSA) schedule. Information about GSA programs for state and local governments can be found at <https://www.gsa.gov/resources-for/programs-for-state-and-local-governments>. For local governments that purchase off a GSA schedule, this will satisfy the Federal requirements for full and open competition provided that the recipient follows the GSA ordering procedures; however, local governments will still need to follow the other rules under 2 C.F.R. §§ 200.317 – 200.326, such as contract cost and price (§ 200.323) and solicitation of minority, women-owned, or small businesses (§ 200.321).

For non-Federal entities other than states, such as tribes, that want to procure goods or services from a state supply schedule, cooperative purchasing program, or other similar program, in order for such procurements to be permissible, the following must be true:

- The procurement of the original contract or purchasing schedule and its use by the recipient complies with state and local law, regulations, and written procurement procedures.
- The state or other entity that originally procured the original contract or purchasing schedule entered into the contract or schedule with the express purpose of making it available to the recipient and other similar types of entities.
- The contract or purchasing schedule specifically allows for such use, and the work to be performed for the non-Federal entity falls within the scope of work under the contract as to type, amount, and geography.
- The procurement of the original contract or purchasing schedule complied with all of the procurement standards applicable to a non-Federal entities other than states under 2 C.F.R. §§ 200.317 – 200.326.
- With respect to the use of a purchasing schedule, the recipient must follow ordering procedures that adhere to state and local laws and regulations and the minimum requirements of full and open competition under 2 C.F.R. Part 200.

If a non-Federal entity other than a state seeks to use such a state supply schedule, cooperative purchasing program, or other similar type of arrangement, it is recommended that recipients discuss their procurement plans with the FEMA Grant Programs Directorate.

Documentation

Non-Federal entities are required to maintain and retain the following:

- Backup documentation, such as bids and quotes.
- Cost/price analyses on file for review by Federal personnel, if applicable.
- Other documents required by Federal regulations applicable at the time a grant is awarded to a recipient.

FEMA requires that non-Federal entities maintain the following documentation for federally funded purchases:

- Specifications
- Solicitations
- Competitive quotes or proposals
- Basis for selection decisions
- Purchase orders
- Contracts
- Invoices
- Cancelled checks

Non-Federal entities should keep detailed records of all transactions involving the grant. FEMA may at any time request copies of purchasing documentation along with copies of cancelled checks for verification.

Non-Federal entities who fail to fully document all purchases will find their expenditures questioned and subsequently disallowed.

Appendix A – FY 2018 NSGP UASI-Designated Urban Areas and NSGP-S Targeted Allocations

FY 2018 NSGP UASI-Designated Urban Areas

State/Territory	Urban Area
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 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
	Pittsburgh Area
Texas	Dallas/Fort Worth/Arlington Area
	Houston Area
	San Antonio Area
Virginia	Hampton Roads Area
Washington	Seattle Area

FY 2018 NSGP-S Target Allocations

State/Territory	FY 2018 Allocation	State/Territory	FY 2018 Allocation
Alabama	\$ 200,000	Montana	\$ 100,000
Alaska	\$ 100,000	Nebraska	\$ 150,000
American Samoa	\$ 100,000	Nevada	\$ 100,000
Arizona	\$ 150,000	New Hampshire	\$ 150,000
Arkansas	\$ 200,000	New Jersey	\$ 150,000
California	\$ 300,000	New Mexico	\$ 150,000
Colorado	\$ 150,000	New York	\$ 300,000
Connecticut	\$ 200,000	North Carolina	\$ 300,000
Delaware	\$ 100,000	North Dakota	\$ 100,000
District of Columbia	\$ -	Northern Mariana Islands	\$ 100,000
Florida	\$ 250,000	Ohio	\$ 400,000
Georgia	\$ 250,000	Oklahoma	\$ 200,000
Guam	\$ 100,000	Oregon	\$ 150,000
Hawaii	\$ 100,000	Pennsylvania	\$ 250,000
Idaho	\$ 150,000	Puerto Rico	\$ 200,000
Illinois	\$ 250,000	Rhode Island	\$ 100,000
Indiana	\$ 250,000	South Carolina	\$ 200,000
Iowa	\$ 200,000	South Dakota	\$ 100,000
Kansas	\$ 150,000	Tennessee	\$ 250,000
Kentucky	\$ 200,000	Texas	\$ 400,000
Louisiana	\$ 200,000	U.S. Virgin Islands	\$ 100,000
Maine	\$ 150,000	Utah	\$ 150,000
Maryland	\$ 150,000	Vermont	\$ 100,000
Massachusetts	\$ 250,000	Virginia	\$ 200,000
Michigan	\$ 250,000	Washington	\$ 200,000
Minnesota	\$ 150,000	West Virginia	\$ 150,000
Mississippi	\$ 150,000	Wisconsin	\$ 250,000
Missouri	\$ 200,000	Wyoming	\$ 100,000
Total Allocation			\$ 10,000,000

Figures reflected above are target allocations. Final allocation decisions are subject to change based on the number of applications and total federal funding request from each eligible recipient.

Appendix B – FY 2018 NSGP Priorities

The Alignment of NSGP to the National Preparedness System

The FY 2018 NSGP contributes to the implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities. The core capabilities are essential for the execution of critical tasks identified in the National Planning Frameworks for each of the five mission areas outlined in the Goal. The NSGP allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas described in the Goal.

Emphasis is placed on capabilities that address the greatest risks to the security and resilience of the United States.

The FY 2018 NSGP supports investments that improve the ability of organizations nationwide to:

- Prevent a threatened or an actual act of terrorism;
- Protect our citizens, residents, visitors, and assets against the greatest threats and hazards;
- Mitigate the loss of life and property by lessening the impact of future disasters;
- Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of a catastrophic incident; and/or
- Recover through a focus on the timely restoration, strengthening, and revitalization of infrastructure, housing, and a sustainable economy, as well as the health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident.

The core capabilities contained in the Goal are highly interdependent and require the use of existing preparedness networks and activities, improved training and exercise programs, innovation, and appropriate administrative, finance, and logistics.

To support building, sustaining, and delivering these core capabilities, recipients will use the components of the National Preparedness System, which are: Identifying and Assessing Risk; Estimating Capability Requirements; Building and Sustaining Capabilities; Planning to Deliver Capabilities; Validating Capabilities; and Reviewing and Updating. For more information on each component, read the National Preparedness System description available at <http://www.fema.gov/national-preparedness-system>. Recipients are expected to use the components when using grant funds to address their capability gaps.

Building and Sustaining Capabilities

The FY 2018 NSGP focuses on the development and sustainment of core capabilities as outlined in the Goal. Particular emphasis will be placed on building and sustaining capabilities that address high consequence events that pose the greatest risk to the security and resilience of the United States.

Capabilities are the means to accomplish a mission, function, or objective based on the performance of related tasks, under specified conditions, to target levels of performance.

Working together, individuals, government and nonprofit officials, and elected leaders can develop plans to allocate resources effectively and reduce risk. For these plans to be effective, those involved must consider methods to reduce and manage risk as well as how to sustain appropriate levels of capability and address potential gaps in order to achieve the Goal.

Achieving the Goal will require participation and resources from the whole community. Not all capabilities can be addressed in a given local, state, or Federal funding cycle, nor can funding be expected to flow from any one source. Officials must prioritize the achievement of certain capabilities to most effectively ensure their security and resilience while understanding the effects of not addressing other identified needs. Building and sustaining capabilities will include a combination of organizational resources, equipment, training, and education. Consideration must also be given to finding, connecting to, and strengthening community resources by using the expertise and capacity of the whole community: individuals, communities, private and nonprofit sectors, faith-based organizations, and all levels of government. Officials are encouraged to use program design and delivery practices that ensure representation and services for under-represented diverse populations that may be more impacted by disasters including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations. Jurisdictions must also use mutual aid agreements to fill needs and work with partners to develop regional capabilities. Ultimately, a jurisdiction may need to rely on other levels of government or partners to address a particular need. This expectation should be communicated well before an event occurs when the capabilities are most urgently needed.

Strengthening Governance Integration

DHS/FEMA preparedness grant programs are intended to support the core capabilities across the five mission areas of Prevention, Protection, Mitigation, Response and Recovery that are necessary to prepare for incidents that pose the greatest risk to the Nation's security. Each program reflects the Department's intent to build and sustain an integrated network of national capabilities across all levels of government and the whole community. Disparate governance structures must be integrated and refined to ensure resources are targeted to support the most critical needs of a community based on risk driven, capabilities-based planning. Strong and inclusive governance systems better ensure that disparate funding streams are coordinated and applied for maximum impact.

DHS/FEMA requires that all governance processes that guide the allocation of preparedness grant funds adhere to the following guiding principles:

- *Prioritization of Investments* – resources must be allocated to address the most critical capability needs.
- *Transparency* – stakeholders must be provided visibility on how preparedness grant funds are allocated and distributed, and for what purpose.
- *Substantive Local Involvement* – the tools and processes that are used to inform the critical priorities, which DHS/FEMA grants support must include local government representatives. At the state and regional levels, local risk assessments must be included in the overarching analysis to ensure that the threats and hazards of primary concern to the jurisdiction are accounted for.

- *Accountability* –FEMA recognizes that unique preparedness gaps exist at the local level. However, grant recipients are responsible for ensuring the effective use of grant funds to address those gaps and for maintaining and sustaining existing capabilities.
- *Support of Regional Coordination* – Inter/intra-state partnerships and dependencies at the state and regional levels, including those within metropolitan areas, must be recognized.

Appendix C – Funding Guidelines

NSGP grant recipients and subrecipients may only use NSGP grant funds for the purpose set forth in the grant award, and must use funding in a way that is consistent with the statutory authority for the award. Grant funds may not be used for matching funds for other Federal grants or cooperative agreements, lobbying, or intervention in Federal regulatory or adjudicatory proceedings. In addition, Federal funds may not be used to sue the Federal Government or any other government entity.

Pre-award costs are allowable only with the prior written approval of DHS/FEMA and if they are included in the award agreement. To request pre-award costs a written request must be included with the application, signed by the Authorized Organizational Representative of the entity. The letter must outline what the pre-award costs are for, including a detailed budget break-out of pre-award costs from the post-award costs, and a justification for approval.

The following information outlines general allowable and unallowable NSGP costs guidance.

Allowable Costs

Management and Administration (M&A)

M&A activities are those costs defined as directly relating to the management and administration of NSGP funds, such as financial management and monitoring. The amount of M&A is specified in each fiscal year's NOFO. M&A costs include the following categories of activities:

- Hiring of full-time or part-time staff or contractors/consultants responsible for activities relating to the management and administration of NSGP funds
- Meeting-related expenses directly related to M&A of NSGP funds

Indirect Costs

Indirect costs are allowable under this program as described in 2 C.F.R. § 200.414. With the exception of recipients who have never received a negotiated indirect cost rate as described in 2 C.F.R. § 200.414(f), recipients must have an approved indirect cost rate agreement with their cognizant Federal agency to charge indirect costs to this award. A copy of the approved rate (a fully executed, agreement negotiated with the applicant's cognizant Federal agency) is required at the time of application, and must be provided to DHS/FEMA before indirect costs are charged to the award.

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 and should include with access and functional needs as well as those with limited English proficiency. Examples of planning activities allowable under this program include:

- Development and enhancement of security plans and protocols;
- Development or further strengthening of security assessments;

- Emergency contingency plans;
- Evacuation/Shelter-in-place plans; and
- Other project planning activities with prior approval from DHS/FEMA.

Equipment

Allowable costs are focused on target hardening and physical security enhancements. Funding can be used for the acquisition and installation of security equipment on real property (including buildings and improvements) owned or leased 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 in the following two categories** of items on the Authorized Equipment List (AEL):

- Physical Security Enhancement Equipment (Category 14)
- Inspection and Screening Systems (Category 15)

The two allowable prevention and protection categories and equipment standards for the NSGP are listed on DHS AEL located on the DHS/FEMA site at <http://www.fema.gov/authorized-equipment-list>. Unless otherwise stated, equipment must meet all mandatory regulatory and/or DHS-adopted standards to be eligible for purchase using these funds, including the Americans with Disabilities Act. In addition, agencies will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment.

Applicants should analyze the cost benefits of purchasing versus leasing equipment, especially high cost items and those subject to rapid technical advances. Large equipment purchases must be identified and explained. For more information regarding property management standards for equipment, please reference 2 C.F.R. Part 200, including 2 C.F.R. §§ 200.310, 200.313, and 200.316.

Exercise

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. All shortcomings or gaps—including those identified for children and individuals with access and functional needs—should be identified in an improvement plan. Improvement plans should be dynamic documents with corrective actions continually monitored and implemented as part of improving preparedness through the exercise cycle.

The Homeland Security Exercise and Evaluation Program (HSEEP) provides a set of guiding principles for exercise programs, as well as a common approach to exercise program management, design and development, conduct, evaluation, and improvement planning. For additional information on HSEEP, refer to <https://www.fema.gov/exercise>. In accordance with HSEEP guidance, subrecipients are reminded of the importance of implementing corrective actions iteratively throughout the progressive exercise cycle. This link provides access to a sample AAR/IP template: <https://preptoolkit.fema.gov/web/hseep->

[resources/improvement-planning](#). Recipients are encouraged to enter their exercise data and AAR/IP in the Preparedness Toolkit at <https://preptoolkit.fema.gov/web/hseep-resources>.

Maintenance and Sustainment

The use of DHS/FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable, as described in DHS/FEMA Policy FP 205-402-125-1 (Additional guidance is provided in DHS/FEMA Policy FP 205-402-125-1, *Maintenance Contracts and Warranty Coverage Funded by Preparedness Grants*, located at: <http://www.fema.gov/media-library/assets/documents/32474>), under all active and future grant awards, unless otherwise noted.

Grant funds are intended to support the National Preparedness Goal and fund projects that build and sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats that pose the greatest risk to the security of the Nation. In order to provide recipients the ability to meet this objective, the policy set forth in GPD's [IB 379: Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows for the expansion of eligible maintenance and sustainment costs which must be in (1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program, and (3) be tied to one of the core capabilities in the five mission areas outlined in the Goal. Additionally, eligible costs may also support equipment, training, and critical resources that have previously been purchased with either Federal grant or any other source of funding other than DHS/FEMA preparedness grant program dollars.

Construction and Renovation

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 approval from DHS/FEMA before any NSGP funds are used for any construction or renovation. Additionally, recipients are required to submit a SF-424C Budget and budget detail citing the project costs. The total cost of any construction or renovation paid for using NSGP funds may not exceed the greater amount of \$1,000,000 or 15 percent (15%) of the NSGP award. Recipients and subrecipients are also encouraged to have completed as many steps as possible for a successful EHP review in support of their proposal for funding (e.g., coordination with their State Historic Preservation Office to identify potential historic preservation issues and to discuss the potential for project effects, compliance with all state and EHP laws and requirements). Projects for which the recipient believes an Environmental Assessment (EA) may be needed, as defined in [DHS Instruction Manual 023-01-001-01, Revision 01](#), [FEMA Directive 108-1](#) and [FEMA Instruction 108-1-1](#), must also be identified to the FEMA HQ Program Analyst within six months of the award and completed EHP review materials must be submitted no later than 12 months before the end of the period of performance. EHP review packets should be sent to gpdehpinfo@fema.gov.

NSGP Program recipients using funds for construction projects must comply with the *Davis-Bacon Act* (40 U.S.C. § 3141 *et seq.*). Grant recipients must ensure that their contractors or subcontractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics employed on projects of a character similar to the contract work in

the civil subdivision of the state in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*, including Department of Labor (DOL) wage determinations, is available from the following website:
<https://www.dol.gov/whd/govcontracts/dbra.htm>.

Training

Nonprofit organization staff may use NSGP funds to attend security-related training courses and programs within the United States. Allowable training-related costs under the NSGP are limited to attendance fees for training, and related expenses, such as materials, supplies, and/or equipment. Overtime, backfill, and/or travel expenses are not allowable costs. 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 IJ. Training should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills.

Proposed attendance at training courses and all associated costs using the NSGP must be included in the nonprofit organization's IJ.

1. Unallowable Costs

The following projects and costs are considered **ineligible** for award consideration:

- Organization costs, and operational overtime costs
- Hiring of public safety personnel
- General-use expenditures
- Overtime and backfill
- Initiatives that do not address the implementation of programs/initiatives to build prevention and protection-focused capabilities directed at identified facilities and/or the surrounding communities
- The development of risk/vulnerability assessment models
- Initiatives that fund risk or vulnerability security assessments or the development of the IJ
- Initiatives in which Federal agencies are the beneficiary or that enhance Federal property
- Initiatives which study technology development
- Proof-of-concept initiatives
- Initiatives that duplicate capabilities being provided by the Federal Government
- Organizational operating expenses
- Reimbursement of pre-award security expenses

Appendix D – NSGP Investment Justification Scoring Criteria

APPLICANT INFORMATION

Identify the following (this information will not be scored but must be included in order for the application to be considered complete):

- Legal Name of the Organization
- Physical Address of the Facility: the City, State, Zip Code, and County Name. (Only one facility per Investment Justification)
- Year the Original Facility was Constructed
- Organization Type (Short description of organization's ideology, beliefs, or mission)
- Membership and community served
- 501(c)(3) Number (If Applicable)
- Current Dun and Bradstreet Number
- FY 2018 UASI Urban Area in which the organization is located, (NSGP-UA only)
- NSGP Federal Funding Request
- NSGP Total Project Cost
- Any Current Contract with DHS (not including previously awarded DHS funding) (Yes/No – if yes, please describe)
- Investment Phase – New or Ongoing

Scoring Criteria: Applicant Information section will not be scored.

I. BACKGROUND

Describe the nonprofit organization including:

- Symbolic value of the site(s) as a highly recognized national or historical institution or significant institution within the community that renders the site as a possible target of terrorism
- Any previous or existing role in responding to or recovering from terrorist attacks

Scoring Criteria: The information provided will be scored in terms of its contribution to setting context and its relationship to other questions. Out of 40 points, this section is worth 2 possible points.

II. RISK

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

A. Threat: In considering threat, the applicant should discuss the identification and substantiation of prior threats or attacks against the nonprofit organization or closely related organization by a terrorist organization, network, or cell. The applicant should also discuss findings from risk assessment, police findings, and/or insurance claims at the location where the physical security enhancements will be installed.

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

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

Scoring Criteria: The information provided will be scored based on the indication of an understanding of the organization's risk, including threat and vulnerabilities, as well as potential consequences of an attack. Out of 40 points, this section is worth 12 possible points.

III. TARGET HARDENING

In this section, describe the proposed target hardening activity, including the total Federal funds requested, that addresses the identified threat or vulnerability.

Allowable costs are focused on target hardening activities as well as security-related training courses and programs limited to the protection of critical infrastructure key resources, including physical and cybersecurity, target hardening, and terrorism awareness/employee preparedness. Funding can also be used for the acquisition and installation of security equipment on real property (including buildings and improvements) owned or leased by the nonprofit organization, specifically in prevention of and/or in protection against the risk of a terrorist attack. This equipment is **limited to two categories** of items on the Authorized Equipment List (AEL).

- Physical Security Enhancement Equipment (AEL Category 14)
- Inspection and Screening Systems (AEL Category 15)

The two allowable prevention and protection categories and equipment standards for the NSGP are listed on DHS AEL located on the DHS/FEMA site at <http://www.fema.gov/authorized-equipment-list>. The description must identify the respective AEL number, category, and funding amount for **all** requested equipment. For investments addressing multiple sites, this section must detail which security enhancements are proposed for each site.

Scoring Criteria: Target hardening activity and impact address prevention of, protection against, and/or mitigation of the identified risk(s). Out of 40 points, this section is worth 14 possible points.

IV. MILESTONES

Provide description and associated key activities that lead to the milestone event over the NSGP period of performance. Start dates should reflect the start of the associated key activities and end dates should reflect when the **milestone event will occur**.

Scoring Criteria: Milestones collectively present a clear sequence of events that will allow the Investment to reach its objectives for this period of performance. Out of 40 points, this section is worth 4 possible points.

V. PROJECT MANAGEMENT

Describe the project management, including:

- Who will manage the project
- Description of any challenges to the effective implementation of this project
- Coordination of the project with State and local homeland security partners

Scoring Criteria: Response describes, at a high-level, the roles and responsibilities of the management team, governance structures, and subject matter expertise required to manage the Investment. Out of 40 points, this section is worth 3 possible points.

VI. IMPACT

What measurable outputs and outcomes will indicate that this investment is successful at the end of the NSGP period of performance? Which specific National Preparedness Goal core capabilities does this investment work to achieve? Explain how this investment supports the building or sustaining of the National Preparedness Goal core capabilities.

Scoring Criteria: Response describes how the outcomes will mitigate risks outlined in the Background and Risk sections, as well as how the investment supports building or sustaining the identified National Preparedness Goal core capabilities. Out of 40 points, this section is worth 5 possible points.

VII. BONUS - FUNDING HISTORY

Previous Request Name and Funding: If the nonprofit organization has received NSGP funding in the past, provide the funding source, funding amount, funding year, and the investment type

Scoring Criteria: Due to the competitive nature of this program, preference will be given to nonprofit organizations that have not received prior years funding. Applicants that have not received NSGP funding in the past will receive an additional one bonus point to their total State application score at the time of submission to DHS/FEMA.

Appendix E – FY 2018 NSGP Scoring Worksheet

FISCAL YEAR (FY) 2018 NONPROFIT SECURITY GRANT PROGRAM (NSGP) INVESTMENT JUSTIFICATION SCORING WORKSHEET

State	
Urban Area	
Name of the Nonprofit Organization	
FY 2018 NSGP Federal Funding Request	

Scoring Legend

Did Not	The applicant provided no response
Poor	The applicant's response is incomplete and does not address all of the required information
Partial	The applicant's response is complete but minimally addresses all of the required information
Adequate	The applicant's response is complete and moderately addresses all of the required information
Thorough	The applicant's response is complete and fully addresses all of the required information

I. Applicant Information (Unscored)

1. Did the applicant provide all of the required information in the Applicant Information Section?

No The applicant **did not** provide all of the required information

Yes The applicant **did** provide all of the required information

II. Background (Total of 2 possible points)

2. Did the applicant provide a description of their nonprofit organization to include:

▪ Symbolic value of the site as a highly recognized national or historical institution or significant institution within the community that renders the site as a possible target of terrorism

▪ Any role in responding to or recovering from terrorist attacks

0 = The applicant **did not** provide a response to all of the required information regarding their nonprofit organization

1 = The applicant provided **some** of the required information regarding their nonprofit organization

2 = The applicant provided **all** of the required information regarding their nonprofit organization

Score

III. Risk (Total of 12 possible points)

3. In considering threat, how well did the applicant address findings from previously conducted risk assessments, police reports, and/or insurance claims?

- 0 = The applicant **did not** address findings from previously conducted risk assessments, police reports, and/or insurance claims
- 1 = The applicant **poorly** addressed findings from previously conducted risk assessments, police reports, and/or insurance claims
- 2 = The applicant **partially** addressed findings from previously conducted risk assessments, police reports, and/or insurance claims
- 3 = The applicant **adequately** addressed findings from previously conducted risk assessments, police reports, and/or insurance claims
- 4 = The applicant **thoroughly** addressed findings from previously conducted risk assessments, police reports, and/or insurance claims

Score

4. In considering vulnerabilities, how well did the applicant describe the organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist attack?

- 0 = The applicant **did not** address the organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist attack
- 1 = The applicant **poorly** addressed the organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist attack
- 2 = The applicant **partially** addressed the organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist attack
- 3 = The applicant **adequately** addressed the organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist attack
- 4 = The applicant **thoroughly** addressed the organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist attack

Score

5. In considering potential consequences, how well did the applicant address potential negative effects on the organization's asset, system, and/or network if damaged, destroyed, or disrupted by a terrorist attack?

- 0 = The applicant **did not** address potential negative effects on the organization's asset, system, and/or network if damaged, destroyed, or disrupted by a terrorist attack
- 1 = The applicant **poorly** addressed potential negative effects on the organization's asset, system, and/or network if damaged, destroyed, or disrupted by a terrorist attack
- 2 = The applicant **partially** addressed potential negative effects on the organization's asset, system, and/or network if damaged, destroyed, or disrupted by a terrorist attack
- 3 = The applicant **adequately** addressed potential negative effects on the organization's asset, system, and/or network if damaged, destroyed, or disrupted by a terrorist attack
- 4 = The applicant **thoroughly** addressed potential negative effects on the organization's asset, system, and/or network if damaged, destroyed, or disrupted by a terrorist attack

Score

IV. Target Hardening (Total of 14 possible points)

6. How well does the proposed target hardening activity mitigate the identified risk(s) and/or vulnerabilities?

- 0 = The applicant **did not** provide a description of how the proposed target hardening activity will mitigate the identified risk(s)
- 1 = The applicant provided a **poor** description of how the proposed target hardening activity will mitigate the identified risk(s)
- 2 = The applicant provided a **partial** description of how the proposed target hardening activity will mitigate the identified risk(s)
- 3 = The applicant provided an **adequate** description of how the proposed target hardening activity will mitigate the identified risk(s)
- 4 = The applicant provided a **thorough** description of how the proposed target hardening activity will mitigate the identified risk(s)

Score

7. Did the applicant's proposed target hardening activity focus on the prevention of and/or protection against the risk of a terrorist attack?

- 0 = The applicant's target hardening activity **did not** focus on the prevention of and/or protection against the risk of a terrorist attack
- 1 = The applicant's target hardening activity **poorly** focused on the prevention of and/or protection against the risk of a terrorist attack
- 2 = The applicant's target hardening activity **partially** focused on the prevention of and/or protection against the risk of a terrorist attack
- 3 = The applicant's target hardening activity **adequately** focused on the prevention of and/or protection against the risk of a terrorist attack
- 4 = The applicant's target hardening activity **thoroughly** focused on the prevention of and/or protection against the risk of a terrorist attack

Score

8. Did the applicant propose projects that are allowable based on the priorities of the program?

- 0 = The proposed projects are not allowable based on the priorities of the program
- 1 = The proposed projects are partially allowable and the unallowability will compromise the successful implementation of the project.
- 2 = The proposed projects are partially allowable but could be resolved with a minor modification to the proposed project
- 3 = The proposed projects are all allowable based on the priorities of the program.

Score

9. Did the applicant propose projects that are feasible based on the priorities of the program?

- 0 = The proposed projects are not feasible based on the priorities of the program
- 1 = The proposed projects could be feasible but require significant changes.
- 2 = The proposed projects could be feasible but require minor changes.
- 3 = The proposed projects are feasible based on the priorities of the program.

Score

V. Milestones (Total of 4 possible points)

10. How well did the applicant describe the milestones and the associated key activities that lead to the milestone event over the FY 2018 NSGP period of performance?

- 0 = The applicant did not provide a description of milestones and associated activities that lead to the milestone event over the FY 2018 NSGP period of performance
- 1 = The applicant provided a poor description of milestones and associated activities that lead to the milestone event over the FY 2018 NSGP period of performance
- 2 = The applicant provided a partial description of milestones and associated activities that lead to the milestone event over the FY 2018 NSGP period of performance
- 3 = The applicant provided an adequate description of milestones and associated activities that lead to the milestone event over the FY 2018 NSGP period of performance
- 4 = The applicant provided a thorough description of milestones and associated activities that lead to the milestone event over the FY 2018 NSGP period of performance

Score

VI. Project Management (Total of 3 possible points)

11. How well did the applicant justify the effectiveness of the proposed management team's roles and responsibilities and governance structure to support the implementation of the Investment?

- 0 = The applicant **did not** justify the effectiveness of the proposed management team's roles and responsibilities and governance structure to support the implementation of the Investment
- 1 = The applicant **partially** justified the effectiveness of the proposed management team's roles and responsibilities and governance structure to support the implementation of the Investment
- 2 = The applicant **adequately** justified the effectiveness of the proposed management team's roles and responsibilities and governance structure to support the implementation of the Investment
- 3 = The applicant **thoroughly** justified the effectiveness of the proposed management team's roles and responsibilities and governance structure to support the implementation of the Investment

Score

VII. Impact (Total of 5 possible points)

12. How well did the applicant describe the outcomes/outputs that would indicate that the investment was successful?

- 0 = The applicant did not discuss what outcomes/outputs indicate that the investment was successful
- 1 = The applicant poorly discussed what outcomes/outputs indicate that the investment was successful
- 2 = The applicant partially discussed what outcomes/outputs indicate that the investment was successful
- 3 = The applicant adequately discussed what outcomes/outputs indicate that the investment was successful
- 4 = The applicant thoroughly what outcomes/outputs indicate that the investment was successful

Score

13. Did the applicant describe how the investment supports building or sustaining the identified Goal Core Capabilities?

- 0 = The applicant did not provide a description of how the investment supports building or sustaining the identified Goal Core Capabilities
- 1 = The applicant provide a description of how the investment supports building or sustaining the identified Goal Core Capabilities

Score

Total Score

Total Investment Justification

Score:

Based on a possible score of **40**, this Investment Justification scored a:

Appendix F –Application Information for Nonprofit Organizations

Who is eligible to apply for the FY 2018 NSGP?

Eligible nonprofit organizations are those organizations that are:

1. Described under section 501(c)(3) of the Internal Revenue Code of 1986 (IRC) and exempt from tax under section 501(a) of such code; refer to links below for additional information:
 - <https://www.irs.gov/charities-non-profits/charitable-organizations/exemption-requirements-section-501-c-3-organizations>
 - <https://www.irs.gov/publications/p557/ch03.html>
 - <https://www.irs.gov/charities-non-profits>

Note: The Internal Revenue Service (IRS) does not require certain organizations such as churches, mosques, and synagogues to apply for and receive a recognition of exemption under section 501(c)(3) of the IRC. Such organizations are automatically exempt if they meet the requirements of section 501(c)(3). These organizations are not required to provide recognition of exemption. For organizations that the IRS requires to apply for and receive a recognition of exemption under 501(c)(3), the state may or may not require recognition of exemption, as long as the method chosen is applied consistently.

2. Determined to be at high risk of a terrorist attack by the Secretary of Homeland Security; and
3. For NSGP-UA only, located within one of the FY 2018 UASI-designated urban areas, listed in [Appendix A- FY 2018 NSGP UASI-Designated Urban Areas](#); and

Should I apply to NSGP-UA or NSGP-S?

If your nonprofit organization is physically located within a FY 2018 UASI-designated urban area, then you may apply to NSGP-UA; if your nonprofit organization is not physically located within a FY 2018 UASI-designated urban area then you may apply to NSGP-S. **You may not apply to both programs.** Contact your SAA if you are not sure whether your nonprofit organization's physical address is located within a designated urban area.

How can a nonprofit organization apply for FY 2018 NSGP?

Nonprofit organizations must apply for FY 2018 NSGP through their SAA.

A list of SAA points of contact is available at: <http://www.fema.gov/media-library/assets/documents/28689?id=6363>. Nonprofit organizations **may not** apply directly to DHS/FEMA for FY 2018 NSGP funds.

SAAs establish all requirements and deadlines to manage their nonprofit subapplication process in support of the SAAs submissions to DHS/FEMA. Deadlines and state requirements may vary from state to state. Contact the SAA for submission deadlines or additional information/requirements.

What must a nonprofit organization submit to apply?

As part of the FY 2018 NSGP application each eligible nonprofit subapplicant must submit the following three documents to the SAA:

1. *NSGP Investment Justification (IJ)*

Each sub-applicant, must develop a formal IJ that addresses each investment proposed for funding. Security enhancements must be for the locations that the nonprofit occupies at the time of application. The investments or projects described in the IJ must:

- Address an identified risk, including threat and vulnerability, and build or sustain a core capability identified in the Goal;
- Demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA;
- Be both feasible and effective at reducing the risks for which the project was designed;
- Be able to be fully completed within the three-year period of performance; and
- Be consistent with all applicable requirements outlined in the NOFO.

2. *Vulnerability/Risk Assessment*

Each sub-applicant must include its vulnerability/risk assessment on which the request in the IJ is based.

3. *Mission Statement*

Each subapplicant must include its Mission Statement and any mission implementing policies or practices that may elevate the organization's risk. Recognizing the impact an organization's ideology, beliefs, or mission may have on their risk of potential terrorist threats, SAA's will use the Mission Statement along with information provided in the applicant's IJ in order to validate the organization type. The central purpose of the organization described in the Mission Statement will be used to validate the organization type identified in the IJ as one of the following: 1) Ideology-based/Spiritual/Religious; 2) Educational; 3) Medical; or 4) Other.

For NSGP-UA, the organization type is a factor when calculating the final score of the application; see [Section E. Application Review Information – Final Score](#).

Applicants will find additional information regarding the NSGP IJ template, DHS/FEMA Form 089-24 (OMB Control Number: 1660-0110), in [Appendix D –NSGP Investment Justification and Scoring Criteria](#).

What is the application review criteria?

Criteria

The following are FY 2018 NSGP evaluation criteria:

- For NSGP-UA only, State and Federal verification that the nonprofit organization is located within one of the FY 2018 UASI-designated urban areas, listed in [Appendix A – FY 2018 NSGP UASI-Designated Urban Areas](#)

- Identification and substantiation of current or persistent threats or attacks (from within or outside the U.S.) by a terrorist organization, network, or cell against the applicant based on their ideology, beliefs, or mission
- Symbolic value of the site(s) as a highly recognized regional and/or national or historical institution(s) that renders the site a possible target of terrorism
- Role of the applicant nonprofit organization in responding to or recovering from terrorist attacks
- Findings from previously conducted threat and/or vulnerability assessments
- Integration of nonprofit preparedness with broader state and local preparedness efforts
- Complete and feasible IJ that addresses an identified risk, including the assessed threat, vulnerability, and consequence of the risk, and proposes building or sustaining a core capability identified in the Goal
- For NSGP-UA only, history of prior funding under NSGP. Not having received prior year funding is a positive factor when calculating the state score of the application; see [Section E. Application Review Information – Review and Selection Process](#) for additional information.

For complete information on the criteria used to review and score IJs at the state and Federal levels, please refer to [Appendix D – NSGP Investment Justification and Scoring Criteria](#).

What is the application review process for NSGP-UA?

The FY 2018 NSGP Application review process is a two-phased state and Federal review process.

State Review: SAAs in coordination with the UAWGs will score and prioritize all eligible nonprofit applications using the NSGP Scoring Worksheet, see [Appendix E – FY 2018 NSGP Scoring Worksheet](#). The SAAs will submit a prioritized list with scores of all eligible IJs along with all eligible IJs for Federal review.

Federal Review: Federal reviewers will then review the highest scoring highest prioritized applications from each urban area, each IJ will be reviewed by two Federal reviewers.

How is an application’s final score determined?

To determine an application’s final score, the sum of the applicant’s state score and the average of the two Federal reviewers’ scores will be multiplied:

- By a factor of three for nonprofit groups that are at a high risk of terrorist attacks due to their ideology, beliefs, or mission;
- By a factor of two for medical and educational institutions; and
- By a factor of one for all other nonprofit organizations.

Final Score Calculation Example:

If the Nonprofit Organization receives the following scores:

State Score: 38

Federal Score 1: 39

Federal Score 2: 37

$$(39+37)/2 + 38 = 76$$

76 would then be multiplied by 1-3 depending on the organization type:

If the organization type is:

Religious/Spiritual: the final score would be 228 (76 x 3)

Medical/Educational: the final score would be 152 (76 x 2)

Other: the final score would be 76 (76 x 1)

How Does FEMA Determine which applications will get funded for NSGP-UA?

All final application scores will be sorted in descending order, regardless of urban area, and applicants will be selected from highest to lowest until available FY 2018 NSGP funding has been exhausted. In the event of a tie during the funding determination process, priority will be given to nonprofit organizations that have not received prior year funding, then those prioritized highest by their SAA.

DHS/FEMA will use the final results to make funding recommendations to the Secretary of Homeland Security. 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.

What is the application review process for NSGP-S?

The SAA will review applications based on the following criteria and recommend to FEMA/DHS which nonprofit organizations should be selected for funding.

- Identification and substantiation of current or persistent threats or attacks (from within or outside the U.S.) by a terrorist organization, network, or cell against the applicant based on their ideology, beliefs, or mission
- Symbolic value of the site(s) as a highly recognized regional and/or national or historical institution(s) that renders the site a possible target of terrorism
- Role of the applicant nonprofit organization in responding to or recovering from terrorist attacks
- Findings from previously conducted threat and/or vulnerability assessments
- Integration of nonprofit preparedness with broader state and local preparedness efforts
- Complete and feasible IJ that addresses an identified risk, including the assessed threat, vulnerability, and consequence of the risk, and proposes building or sustaining a core capability identified in the Goal

The SAA will also base its recommendations on the SAA's subject matter expertise and discretion with consideration to the following factors:

- **Need:** The relative need for the nonprofit organization compared to the other applicants; and
- **Impact:** The feasibility of the proposed project and how effectively the proposed project addresses the identified need.

DHS/FEMA HQ Program Analysts will review the IJs recommended by the SAA to ensure that all proposed investments are allowable.

How Does FEMA Determine which applications will get funded for NSGP-S?

DHS/FEMA will select nonprofits for funding as prioritized by the SAA unless proposed projects are unallowable. If prioritized IJs include unallowable projects, DHS/FEMA will decide to either partially fund the IJ or select the next prioritized IJ.

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.

Helpful Hints for Nonprofits

Has the nonprofit organization/subapplicant contacted the State Administrative Agency (SAA) to:

- Verify the state's application deadline?
- Obtain information on any additional state requirements?

Are the following components included in the application package?

- Mission statement
- Vulnerability Assessment
- Investment Justification (IJ)
- Supporting documentation that substantiates threat, if applicable
- Any other state required information

Are the following items addressed within the IJ?

- Clearly identify risk , vulnerabilities, and consequences
- Description of findings from a previously conducted vulnerability assessment
- Details of any incident(s) that include description, dates etc.
- Brief description of any supporting documentation such as police reports or photographs
- Explanation of how the investments proposed will mitigate or address the vulnerabilities identified from a vulnerability assessment
- Establish a clear linkage with the investment(s) and core capabilities (See National Preparedness Goal)
- All proposed activities are allowable costs
- Realistic milestones that consider Environmental Planning and Historic Preservation review process if applicable
- Description of the project manager(s) level of experience