



# FY 2022 Nonprofit Security Grant Program Notice of Funding Opportunity (NOFO)



## Grant Issued By:

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

## Grant Issued Through:

Missouri Department of Public Safety (DPS), Office of Homeland Security (OHS)

## Assistance Listing:

97.008

## Funding Opportunity Title:

Nonprofit Security Grant Program

## Program Description

The Fiscal Year (FY) 2022 Nonprofit Security Grant Program (NSGP) is one of three grant programs that support DHS/FEMA's focus on enhancing the ability of state, local, tribal, and territorial governments, as well as nonprofits, to prevent, protect against, prepare for, and respond to terrorist attacks. These grant programs are part of a comprehensive set of measures authorized by Congress and implemented by DHS to help strengthen the nation's communities against potential terrorist attacks. Among the five basic homeland security missions noted in the DHS Strategic Plan, NSGP supports the goal to Strengthen National Preparedness and Resilience.

The 2022-2026 FEMA Strategic Plan outlines three bold, ambitious goals in order to position FEMA to address the increasing range and complexity of disasters, support the diversity of communities we serve, and complement the nation's growing expectations of the emergency management community. The NSGP supports FEMA's efforts to instill equity as a foundation of emergency management (Goal 1), as well as promote and sustain a ready FEMA and prepared nation (Goal 3). We invite our stakeholders and partners to also adopt these priorities and join us in building a more prepared and resilient nation.

In FY 2022, there are two funding sources appropriated for nonprofit organizations:

- 1) **Nonprofit Security Grant Program (NSGP) - Urban Area (NSGP-UA):** NSGP-UA funds nonprofit organizations located within FY 2022 Urban Area Security Initiative (UASI)-designated urban areas. Eligible applicant criteria is listed below under Applicant Eligibility Criteria.
- 2) **Nonprofit Security Grant Program (NSGP) - State (NSGP-S):** Under NSGP-S, each state will receive a target allocation for nonprofit organizations located outside of FY 2022 UASI-designated urban areas. Eligible applicant criteria is listed below under Applicant Eligibility Criteria.

For FY 2022, DHS is focused on the importance of information sharing and collaboration to building a national culture of preparedness and protecting against terrorism and other threats to our national security. The threats to our nation have evolved during the past two decades. We now face continuous cyber threats by sophisticated actors, threats to soft targets and crowded places, and threats from domestic violent extremists who currently pose the greatest terrorism threat to the nation. Therefore, for FY 2022, we have identified one priority area tied to some of the most serious threats that recipients should address with their NSGP funds. DHS is focused on forging partnerships to strengthen information sharing and collaboration and, while there are no requirements for information sharing between nonprofit organizations and federal, state, local, tribal, and territorial law enforcement, the NSGP seeks to bring nonprofit organizations into broader state and local preparedness efforts by removing barriers to communication and being more inclusive.

## Objectives

The objective of the FY 2022 NSGP is to provide funding for physical and cyber security enhancements and other security-related activities to nonprofit organizations that are at high risk of a terrorist attack. The NSGP also seeks to integrate the preparedness activities of nonprofit organizations with broader state and local preparedness efforts.

## Priorities

Given the evolving threat landscape, DHS/FEMA has evaluated the national risk profile and set priorities that help ensure appropriate allocation of scarce security dollars. In assessing the national risk profile for FY 2022, one area attracts the most concern under the Nonprofit Security Grant Program:

### 1) Enhancing the protection of soft targets/crowded places

Likewise, there are several enduring security needs that crosscut the homeland security enterprise. The following are second-tier priority areas that help recipients implement a comprehensive approach to securing communities:

- 1) Effective planning
- 2) Training and awareness campaigns
- 3) Exercises

The table below provides a breakdown of these priority areas for the FY 2022 NSGP, showing both the core capabilities enhanced and lifelines supported, as well as examples of eligible project types for each area. A detailed description of allowable investments for each project type is included in the [Preparedness Grants Manual](#).

### FY 2022 NSGP Funding Priorities

Priority Areas	Core Capabilities Enhanced	Lifelines	Example Project Types
<b>National Priorities</b>			
Enhancing the Protection of Soft Targets/Crowded Places	<ul style="list-style-type: none"> <li>• Operational coordination</li> <li>• Public information and warning</li> </ul>	<ul style="list-style-type: none"> <li>• Safety &amp; Security</li> </ul>	<ul style="list-style-type: none"> <li>• Private contracted security guards</li> <li>• Physical security enhancements                             <ul style="list-style-type: none"> <li>○ Closed circuit television (CCTV) security cameras</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• Intelligence and Information Sharing</li> <li>• Interdiction and disruption</li> <li>• Screening, search, and detection</li> <li>• Access control and identity verification</li> <li>• Physical protective measures</li> <li>• Risk management for protection programs and activities</li> </ul>		<ul style="list-style-type: none"> <li>○ Security screening equipment for people and baggage</li> <li>○ Access controls</li> <li>▪ Fences, gates, barriers etc.</li> </ul>
<b>Enduring Needs</b>			
Planning	<ul style="list-style-type: none"> <li>• Planning</li> <li>• Risk management for protection programs &amp; activities</li> <li>• Risk &amp; disaster resilience assessment</li> <li>• Threats and hazards identification</li> <li>• Operational coordination</li> </ul>	<ul style="list-style-type: none"> <li>• Safety &amp; Security</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct or enhancement of security risk assessments</li> <li>• Development of: <ul style="list-style-type: none"> <li>○ Security plans and protocols</li> <li>○ Emergency contingency plans</li> <li>○ Evacuation/shelter in place plans</li> </ul> </li> <li>• Assessment of capabilities and gaps in planning for the needs of persons with disabilities and others with access and functional needs</li> </ul>
Training & Awareness	<ul style="list-style-type: none"> <li>• Long-term vulnerability reduction</li> <li>• Public information &amp; warning</li> </ul>	<ul style="list-style-type: none"> <li>• Safety &amp; Security</li> </ul>	<ul style="list-style-type: none"> <li>• Active Shooter training, including integrating the needs of persons with disabilities</li> <li>• Security training for employees</li> <li>• Public awareness/preparedness campaigns</li> </ul>
Exercises	<ul style="list-style-type: none"> <li>• Long-term vulnerability reduction</li> </ul>	<ul style="list-style-type: none"> <li>• Safety &amp; Security</li> </ul>	<ul style="list-style-type: none"> <li>• Response Exercises</li> </ul>

## **NSGP-UA Maximum Award**

### **St. Louis Urban Area**

Applicants located within the St. Louis Urban Area Security Initiative (UASI)-designated urban area (St. Louis City and Missouri counties of St. Charles County, Franklin County, Jefferson County, St. Louis County and Illinois counties of Madison, St. Clair, and Monroe) with one site may apply for up to \$150,000 per site. Applicants with multiple sites may apply for up to \$150,000 per site, for up to three sites, for a maximum of \$450,000 per organization. If an applicant applies for projects at multiple sites, regardless of whether the projects are similar in nature, it must include an assessment of the vulnerability and risk unique to each site. Failure to do so may be cause for rejection of the application. Applicants must apply through the Missouri Department of Public Safety, Office of Homeland Security using the WebGrants System at <https://dpsgrants.dps.mo.gov/index.do>.

*If an applicant applies for multiple sites, it must submit one complete Investment Justification (IJ) for each site.*

### **Kansas City Urban Area**

Applicants located within the Kansas City Urban Area Security Initiative (UASI)-designated urban area (Missouri counties of Jackson, Cass, Platte, Clay, and Ray and Kansas counties of Leavenworth, Wyandotte, and Johnson) with one site may apply for up to \$150,000 per site. Applicants with multiple sites may apply for up to \$150,000 per site, for up to three sites, for a maximum of \$450,000 per organization. If an applicant applies for projects at multiple sites, regardless of whether the projects are similar in nature, it must include an assessment of the vulnerability and risk unique to each site. Failure to do so may be cause for rejection of the application. Applicants must apply through the Missouri Department of Public Safety, Office of Homeland Security using the WebGrants System at <https://dpsgrants.dps.mo.gov/index.do>.

*If an applicant applies for multiple sites, it must submit one complete Investment Justification (IJ) for each site.*

### **NSGP-S Maximum Award**

Applicants located within the state of Missouri **outside** of the St. Louis and Kansas City Urban Area Security Initiatives with one site may apply for up to \$150,000 per site. Applicants with multiple sites may apply for up to \$150,000 per site, for up to three sites, for a maximum of \$450,000 per organization. If an applicant applies for projects at multiple sites, regardless of whether the projects are similar in nature, it must include an assessment of the vulnerability and risk unique to each site. Failure to do so may be cause for rejection of the application. Applicants must apply through the Missouri Department of Public Safety, Office of Homeland Security using the WebGrants System at <https://dpsgrants.dps.mo.gov/index.do>.

*If an applicant applies for multiple sites, it must submit one complete Investment Justification (IJ) for each site.*

**Period of Performance:** 24 months

Extensions to the period of performance may be allowed. For additional information on period of performance extensions refer to the Office of Homeland Security Administrative Guide for information.

**Projected Period of Performance Start Date(s):** September 1, 2022

**Projected Period of Performance End Date(s):** August 31, 2024

**Funding Instrument Type:** Grant

### **Applicant 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.

**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 section 501(c)(3), the state of Missouri requires recognition of exemption to be submitted with the application.

Refer to links below for additional information:

- <https://www.irs.gov/charities-non-profits/charitable-organizations/exemption-requirements-501c3-organizations>
- <https://www.irs.gov/publications/p557/ch03.html>
- <https://www.irs.gov/charities-non-profits>

2. Able to demonstrate, through the application, that the organization is at high risk of a terrorist attack;

3. NSGP-UA

- a. located **inside** of the FY 2022 St. Louis UASI-designated urban area (St. Louis City and the Missouri Counties of Franklin, Jefferson, St. Charles, and St. Louis and Illinois counties of Madison, St. Clair, and Monroe)
- b. located **inside** of the FY 2022 Kansas City UASI-designated urban area (Missouri Counties of Jackson, Cass, Platte, Clay, and Ray and Kansas counties of Leavenworth, Wyandotte, and Johnson)

4. NSGP-S, located within the State of Missouri **outside** of the FY 2022 St. Louis UASI-designated urban area (St. Louis City and the Missouri Counties of Franklin, Jefferson, St. Charles, and St. Louis) and Kansas City UASI-designated urban area (Missouri Counties of Jackson, Cass, Platte, Clay, and Ray)

*An application submitted by an otherwise eligible non-federal entity (i.e., the applicant) may be deemed ineligible when the person that submitted the application is not: 1) a **current employee, personnel, official, staff, or leadership of the non-federal entity**; and 2) **duly authorized to apply for an award on behalf of the non-federal entity at the time of application**. Further, the Authorized Organization Representative (AOR)/Authorized Official must be a **duly authorized current employee, personnel, official, or leadership of the recipient and provide an email address unique to the recipient at the time of application and upon any change in assignment during the period of performance**. **Consultants or contractors of the recipient are not permitted to be the AOR/Authorized Official of the recipient.***

## **Application and Submission Information**

### **1. Key Dates and Times**

**a. Application Start Date:** May 18, 2022

**b. Application Submission Deadline:** June 1, 2022, 5:00 p.m. CST

### **2. Agreeing to Terms and Conditions of the Award**

By submitting an application, applicants agree to comply with the requirements of this NOFO and the terms and conditions of the award, should they receive an award.

## NSGP Nonprofit Organization Specific Application Instructions

Applications will only be accepted through the Missouri Department of Public Safety (DPS) online WebGrants System. <https://dpsgrants.dps.mo.gov/index.do>.

Applicants must designate the NSGP funding source they are applying for in the WebGrants System. Applicants should review the FY 2022 NSGP Funding Source Map in WebGrants to determine which program to apply for based on the physical location of the facility for the project. If the incorrect funding source is chosen, the application will be ineligible for funding.

- NSGP – S
- NSGP – UA St. Louis
- NSGP – UA Kansas City

A PowerPoint presentation with instructions on how to apply through the WebGrants System will be available on the DPS website under Grant Applications and Forms, FY 2022 Nonprofit Security Grant Program (NSGP): <https://dps.mo.gov/dir/programs/ohs/grantstraining/>.

As part of the FY 2022 NSGP application, each eligible nonprofit applicant must submit the following documents:

### 1. NSGP Investment Justification (IJ)

Applicants with one site may apply for up to \$150,000 for that site. Applicants with multiple sites may apply for up to \$150,000 per site, for up to three sites, for a maximum of \$450,000 per applicant. If an applicant applies for multiple sites, it **must submit one complete IJ for each site**.

The IJ must describe each investment proposed for funding. The investments or projects described in the IJ must:

- Be for the location(s) that the nonprofit occupies at the time of application;
- **Address an identified risk, including threat and vulnerability, and build or sustain a core capability identified in the National Preparedness Goal for that site, regardless of whether it is submitting for similar projects at multiple sites;**
- 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 two-year period of performance; and
- Be consistent with all applicable requirements outlined in the NOFO and the [Preparedness Grants Manual](#).

Applicants are required to self-identify with one of the following four categories in the IJ as part of the application process:

1. Ideology-based/Spiritual/Religious
2. Educational
3. Medical
4. Other

The IJ must be submitted as an attachment to the application through the WebGrants System.

## **2. Vulnerability/Risk Assessment**

Each applicant must include a vulnerability/risk assessment **unique to the site** the IJ is being submitted for.

The Vulnerability/Risk Assessment must be submitted as an attachment to the application through the WebGrants System.

## **3. Mission Statement**

Each applicant must include its Mission Statement and any mission implementation policies or practices that may elevate the organization's risk.

The Mission Statement must be submitted as an attachment to the application through the WebGrants System.

## **4. Audit**

Each applicant must provide the agency's most recent audit. If the audit is more than three years old, the agency must provide their most recent annual financial statement.

The audit/financial statement must be submitted as an attachment to the application through the WebGrants System.

## **5. 501(c)(3) Documentation**

Applicants, that are required by the IRS to apply for and receive a recognition of exemption under section 501 (c)(3), must submit recognition of exemption as an attachment to the application through the WebGrants System.

## **Funding Restrictions and Allowable Costs**

All costs charged to awards covered by this NOFO must comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements at 2 C.F.R. Part 200, unless otherwise indicated in the NOFO, the terms and conditions of the award, or the [Preparedness Grants Manual](#). This includes, among other requirements, that costs must be incurred, and products and services must be delivered, within the period of performance of the award. *See* 2 C.F.R. § 200.403(h) (referring to budget periods, which for FEMA awards under this program is the same as the period of performance).

Federal funds made available through this award may be used for the purpose set forth in this funding notice, the [Preparedness Grants Manual](#), and the terms and conditions of the 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 awards, 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. See the [Preparedness Grants Manual](#) for more information on funding restrictions and allowable costs.

## **1. Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services**

Recipients and subrecipients of FEMA federal financial assistance are subject to the prohibitions described in section 889 of the [John S. McCain National Defense Authorization Act for Fiscal Year 2019 \(FY 2019 NDAA\)](#), Pub. L. No. 115-232 (2018) and 2 C.F.R. §§ 200.216, 200.327, 200.471, and Appendix II to 2 C.F.R. Part 200. Beginning August 13, 2020, the statute – as it applies to FEMA recipients, subrecipients, and their contractors and subcontractors – prohibits obligating or expending federal award funds on certain telecommunications and video surveillance products and contracting with certain entities for national security reasons.

Guidance is available at [Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services \(Interim\) FEMA Policy #405-143-1](#), or superseding document.

Additional guidance is available at [Contract Provisions Guide: Navigating Appendix II to Part 200 – Contract Provisions for Non-Federal Entity Contracts Under Federal Awards](#) (fema.gov).

**Effective August 13, 2020**, FEMA recipients and subrecipients **may not** use any FEMA funds under open or new awards to:

- a. Procure or obtain any equipment, system, or service that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology of any system;
- b. Enter into, extend, or renew a contract to procure or obtain any equipment, system, or service that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology of any system; or
- c. Enter into, extend, or renew contracts with entities that use covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system.

## **I. Replacement Equipment and Services**

FEMA grant funding may be permitted to procure replacement equipment and services impacted by this prohibition, provided the costs are otherwise consistent with the requirements of the funding notice, the [Preparedness Grants Manual](#), and any other state-specific requirements.

## **II. Definitions**

Per section 889(f)(2)-(3) of the FY 2019 NDAA and 2 C.F.R. § 200.216, covered telecommunications equipment or services means:

- i. Telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation, (or any subsidiary or affiliate of such entities);
- ii. For the purpose of public safety, security of Government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and telecommunications equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology



- Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities);
- iii. Telecommunications or video surveillance services provided by such entities or using such equipment; or
  - iv. Telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned or controlled by, or otherwise connected to, the People's Republic of China.

Examples of the types of products covered by this prohibition include phones, internet, video surveillance, and cloud servers when produced, provided, or used by the entities listed in the definition of "covered telecommunications equipment or services." See 2 C.F.R. § 200.471

## **2. Pre-Award Costs**

Pre-award costs are generally not allowable for this program. However, certain pre-award costs can be allowable only with the prior written approval of DHS/FEMA/OHS and only if the costs are included in the award agreement. To request pre-award costs, a written request must be included with the application and signed by the AOR/Authorized Official of the entity. The request letter must outline what the pre-award costs are for, including a detailed budget breakout of pre-award costs from the post-award costs, and a justification for approval. Please note that pre-award security expenses are not allowable. Pre-award costs resulting from pre-award grant writing services provided by an independent contractor that shall not exceed \$1,500 are allowed, as detailed in this funding notice.

## **3. Management and Administration (M&A) Costs**

Nonprofit organizations that receive a subaward under this program may use and expend up to 5 percent of their FY 2022 NSGP funds for M&A purposes associated with the subaward.

M&A costs are for activities directly related to the management and administration of the award. M&A activities are those defined as directly relating to the management and administration of NSGP funds, such as financial management and monitoring. M&A 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 result 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.

## **4. Indirect Facilities & Administrative (F&A) Costs**

Indirect costs are allowable under this program as described in 2 C.F.R. Part 200, including 2 C.F.R. § 200.414. Applicants with a current negotiated indirect cost rate agreement that desire to charge indirect costs to an award must provide a copy of their negotiated indirect cost rate agreement at the time of application. Not all applicants are required to have a current negotiated indirect cost rate agreement. Applicants that are not required by 2 C.F.R. Part 200 to have a

negotiated indirect cost rate agreement but are required by 2 C.F.R. Part 200 to develop an indirect cost rate proposal must provide a copy of their proposal at the time of application. Applicants who do not have a current negotiated indirect cost rate agreement (including a provisional rate) and wish to charge the de minimus rate must reach out to the OHS for further instructions. Applicants who wish to use a cost allocation plan in lieu of an indirect cost rate must also reach out to the OHS. Post-award requests to charge indirect costs will be considered on a case-by-case basis and based upon the submission of an agreement or proposal as discussed above or based upon the de minimus rate or cost allocation plan, as applicable.

## 5. Other Direct Costs

### a. 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 consideration of access and functional needs considerations as well as those with limited English proficiency. Planning efforts can also include conducting risk and resilience assessments on increasingly connected cyber and physical systems, on which security depends, using the [Infrastructure Resilience Planning Framework](#) and related CISA resources. 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
- Coordination and information sharing with fusion centers
- Other project planning activities with prior approval from FEMA

### b. Organization

Organization costs are not allowed under this program.

### c. 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 sections** of items on the [Authorized Equipment List](#) (AEL):

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

In addition to the select items in Sections 14 and 15 listed above, the following equipment is also allowable:

- Notification and Warning Systems

- Radios and Public Warning Systems – Public Address, Handheld, or Mobile

**\*\*Note: Radios purchased with NSGP funding will not be permitted to operate on the Missouri Statewide Interoperability Network (MOSWIN). \*\***

Unless otherwise stated, equipment must meet all mandatory statutory, regulatory, and FEMA-adopted standards to be eligible for purchase using these funds, including the Americans with Disabilities Act. In addition, recipients will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment, whether with NSGP funding or other sources of funds. In addition, recipients that are using NSGP funds to support emergency communications equipment activities must comply with the SAFECOM Guidance on Emergency Communications Grants, including provisions on technical standards that ensure and enhance interoperable communications. This SAFECOM Guidance can be found at <https://www.cisa.gov/safecom/funding>.

Applicants should analyze the costs and 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 but not limited to 2 C.F.R. §§ 200.310, 200.313, and 200.316. Also see 2 C.F.R. §§ 200.216, 200.471, and [FEMA Policy #405-143-1, Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services](#), regarding prohibitions on covered telecommunications equipment or services.

The installation of certain equipment may trigger EHP requirements. Please reference the EHP section in the NOFO and the [Preparedness Grants Manual](#) for more information.

#### **d. Maintenance and Sustainment**

Maintenance and sustainment costs, such as maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable. For additional information, see the [Preparedness Grants Manual](#).

#### **e. Training**

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

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

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

Allowable training-related costs under the NSGP are limited to attendance fees for training and related expenses, such as materials, supplies, and/or equipment. Overtime, backfill, and 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 such as Community Emergency Response Team (CERT) training, indicators and behaviors indicative of terrorist threats, Active Shooter training, and emergency first aid training. Additional examples of allowable training courses include: “Stop the Bleed” training, kits/equipment, and training aids; First Aid and other novice level “you are the help until help arrives” training, kits/equipment, and training aids; and Automatic External Defibrillator (AED) and AED/Basic Life Support training, kits/equipment, and training aids.

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.

#### **f. Exercises**

Funding may be used to conduct security-related exercises. This includes costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, and documentation. Exercises afford organizations the opportunity to validate plans and procedures, evaluate capabilities, and assess progress toward meeting capability targets in a controlled, low-risk setting. 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/emergency-managers/national-preparedness/exercises/hseep>. 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 After Action Report (AAR)/Improvement Plan (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](#).

#### **g. Construction and Renovation**

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

For construction costs to be allowed, they must be specifically approved by DHS/FEMA/OHS in writing prior to the use of any program funds for construction or renovation. Limits on the total amount of grant funding that may be used for construction or renovation may apply.

NSGP funding may not be used for construction and renovation projects without prior written approval from FEMA. In some cases, the installation of equipment may constitute construction and/or renovation. If you have any questions regarding whether an equipment installation project could be considered construction or renovation, please contact the OHS. Recipients are required to submit a SF-424C Budget and budget detail citing the project costs and an SF-424D Form for standard assurances for the construction project. The total cost of any construction or renovation paid for using NSGP funds may not exceed 15% of the NSGP award.

All construction and renovation projects require Environmental Planning and Historic Preservation (EHP) review. Recipients are 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 project effects, compliance with all state and local 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 OHS 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. Additional information on EHP policy and EHP review can be found online at <https://www.fema.gov/media-library/assets/documents/90195>.

NSGP recipients using funds for construction projects must comply with the *Davis-Bacon Act* (codified as amended at 40 U.S.C. §§ 3141 *et seq.*). See 6 U.S.C. § 609(b)(4)(B) (cross-referencing 42 U.S.C. § 5196(j)(9), which cross-references Davis-Bacon). 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>.

#### **h. Operational Overtime**

Operational overtime costs are not allowed under this program.

#### **i. Contracted Security**

Contracted security personnel are allowed under this program only as described in this NOFO and comply with guidance set forth in [IB 421b](#) and [IB 441](#). The nonprofit organization must be able to sustain this capability in future years without NSGP funding, and a sustainment plan will be required as part of the closeout package for any award funding this capability. Contracted security costs described in the IJ should include the hourly/daily rate, the number of personnel, and anticipated number of hours/days the personnel will work over the course of the period of performance. NSGP funds may not be used to purchase equipment for contracted security.

Additionally, NSGP recipients may not use more than 50 percent of their awards to pay for personnel activities unless a waiver is approved by FEMA. For more information on

the 50 percent personnel cap and applicable procedures for seeking a waiver, please see IB 421b, [Clarification on the Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008 \(Public Law 110-412 – the PRICE Act\)](#).

## **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
- Cameras for license plate readers/license plate reader software
- Cameras for facial recognition software
- Weapons or weapons-related training
- Knox boxes

## **Administrative and National Policy Requirements**

In addition to the requirements in this section, FEMA/OHS may place specific terms and conditions on individual awards in accordance with 2 C.F.R. Part 200.

In addition to the information regarding DHS Standard Terms and Conditions and Ensuring the Protection of Civil Rights, see the [Preparedness Grants Manual](#) for additional information on administrative and national policy requirements, including the following:

- [Environmental Planning and Historic Preservation \(EHP\) Compliance](#)
- [FirstNet](#)
- [National Incident Management System \(NIMS\) Implementation](#)
- [SAFECOM Guidance on Emergency Communications Grants](#)

### **1. DHS Standard Terms and Conditions**

All successful applicants for DHS grant and cooperative agreements are required to comply with DHS Standard Terms and Conditions, which are available online at: [DHS Standard Terms and Conditions](#). The applicable DHS Standard Terms and Conditions. The applicable DHS Standard Terms and Conditions will be those in effect at the time the award was made. What terms and conditions will apply for the award will be clearly stated in the award package at the time of award.

## **2. Ensuring the Protection of Civil Rights**

As the Nation works towards achieving the [National Preparedness Goal](#), it is important to continue to protect the civil rights of individuals. Recipients and subrecipients must carry out their programs and activities, including those related to building, sustaining, and delivering core capabilities, in a manner that respects and ensures the protection of civil rights for protected populations. Federal civil rights statutes, such as Section 504 of the Rehabilitation Act of 1973 and Title VI of the Civil Rights Act of 1964, along with DHS and FEMA regulations, prohibit discrimination on the basis of race, color, national origin, sex, religion, age, disability, limited English proficiency, or economic status in connection with programs and activities receiving federal financial assistance from FEMA.

In accordance with civil rights laws and regulations, recipients and subrecipients must ensure the consistent and systematic fair, just and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.

## **3. Environmental Planning and Historic Preservation (EHP) Compliance**

Recipients and subrecipients proposing projects that have the potential to impact the environment, including, but not limited to, the construction of communication towers, modification or renovation of existing buildings, structures and facilities, or new construction including replacement of facilities, must participate in the FEMA EHP review process. The EHP review process involves the submission of a detailed project description along with any supporting documentation requested by FEMA in order to determine whether the proposed project has the potential to impact environmental resources or historic properties.

In some cases, FEMA is also required to consult with other regulatory agencies and the public in order to complete the review process. Federal law requires EHP review to be completed before federal funds are released to carry out proposed projects. FEMA may not be able to fund projects that are not in compliance with applicable EHP laws, Executive Orders, regulations and policies.

DHS and FEMA EHP policy is found in directives and instructions available on the [FEMA.gov EHP page](#), the FEMA website page that includes documents regarding EHP responsibilities and program requirements, including implementation of the National Environmental Policy Act and other EHP regulations and Executive Orders.

The GPD EHP screening form is located at <https://www.fema.gov/medialibrary/assets/documents/90195>. Additionally, all recipients under this funding opportunity are required to comply with the FEMA GPD EHP Policy Guidance, FEMA Policy #108-023-1, available at <https://www.fema.gov/media-library/assets/documents/85376>.

**Contact Information:**

Additional information and resources can be located on the Missouri Department of Public Safety, Office of Homeland Security website: <https://dps.mo.gov/dir/programs/ohs/grantstraining/>

WebGrants System, application submission site: <https://dpsgrants.dps.mo.gov/index.do>

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