

FY 2024 Nonprofit Security Grant

Nonprofit Security Grant - State Program

**FY 2024
State Guidance**

Guidance Released: January 3, 2024



**MONTANA
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Montana Disaster and Emergency Services**

FY 2024 Nonprofit Security Grant

Administered By

Montana Disaster and Emergency Services (MT DES) is the State Administrative Authority (SAA) for the Nonprofit Security Grant – State (NPSG-S)

Catalog of Federal Domestic Assistance (CFDA)

CFDA Title: Nonprofit Security Grant Program (NPSG)

CFDA Number: 97.008

Notice of Funding Opportunity Number

Not yet released

Applications

Applications may be obtained at <https://des.mt.gov/Grant-Programs/Nonprofit-Security-Grant-Program-NSGP>

Applications open on Wednesday, January 3, 2024.

Application deadline is Friday, March 29, 2024, at 11:59 PM.

Period of Performance:

1 October 2024 – June 30, 2027

NOTE: Changes to the FY24 Notice of Funding Opportunity Guidance may result in modifications to this document.

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1.0 Nonprofit Security Grant Program

1.1 Overview

The Nonprofit Security Grant Program-State (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.

Sub-applicants with one site may apply for a maximum of up to \$150,000 for that one site. Sub-applicants with multiple sites may apply for up to \$150,000 per site, for no more than three sites, for a maximum of \$450,000 per applicant. Each site *must* have its own Investment Justification (IJ) and vulnerability/risk assessment for and unique to each site.

At the date of publication of this document, the Department of Homeland Security (DHS) has not released the FY24 NSGP Notice of Funding Opportunity (NOFO). Any changes to the NOFO will be updated at <https://des.mt.gov/>.

1.2 Objectives

The objectives of this grant are to support efforts that:

- 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.
- Integrate the preparedness activities of nonprofit organizations with broader state and local preparedness efforts.
- Encourage a whole community approach to security and emergency management.

1.3 Priorities

Four funding priorities are designated under the FY 2024 NSGP and will continually be evaluated to help ensure appropriate allocation.

- Enhancing the protection of soft target/crowded places (National Priority)
- Effective Planning (Enduring Need)
- Training and awareness campaigns (Enduring Need)
- Exercises (Enduring Need)

2.0 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.

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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 501(c)(3) of the IRC. Such organizations are automatically exempt if they meet the requirements of section 501(c)(3).

2. Determined to be at high risk of a terrorist attack by the Secretary of Homeland Security

3.0 Cost Share

There is NO cost share requirement for this grant.

4.0 NSGP Application

Eligible nonprofit sub-applicants must submit the following three documents to MT DES through the AmpliFund system:

4.1 NSGP Investment Justification (IJ) (PDF File)

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. Applicants must submit in AmpliFund the most current version of the IJ form as provided by FEMA. The investments or projects described in the IJ must:

- Be for the location(s) that the nonprofit occupies at the time of the 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 three-year period of performance.
- Be consistent with all applicable requirements outlined in the NOFO.
- Identify with one of the four categories of: Ideology-based/Spiritual/Religious, Educational, Medical, or Other.

4.2 Vulnerability/Risk Assessment

Each sub-applicant **must** include its vulnerability/risk assessment unique to the project site identified in the application. As part of the vulnerability/risk assessment, police findings/reports and insurance claims (if applicable) should be included as additional supporting documentation.

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4.3 Mission Statement

Each sub-applicant **must** include its Mission Statement and any policies or practices that may elevate the organization's risk. MT DES will use the Mission Statement along with information provided in the application to validate the organization type. The organization purpose as 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
4. Other

5.0 Application Process:

Eligible nonprofit applicants will complete and submit the FY 2024 NSGP application to MT DES through the [AmpliFund](#) grant management system. Applications open January 3, 2024, and the **deadline is March 29, 2024, at 11:59 PM**. Note that Changes to the FY 2024 Notice of Funding Opportunity may result in modifications to this Deadline date.

The following are required documents that must be submitted with the AmpliFund application:

1. **Mission statement** for the nonprofit organization.
2. **Vulnerability assessment** specific to the location/facility being applied for.
3. **Investment Justification (IJ)** which includes sections on the nonprofit organization's risks, vulnerabilities, and the proposed projects that are intended to address or mitigate the identified risks and vulnerabilities. Proposed projects must be for the locations that the nonprofit occupies at the time of application.

5.1 Unique Entity Identifier (UEI)

The federal government now requires the Unique Entity Identifier (UEI) numbers that are created in [SAM.gov](#). This number is required to apply for NSGP. Jurisdictions that do not have a UEI may retrieve it through [SAM.gov](#).

5.2 Applicant Agent or Authorized Representative

The applicant agent or authorized representative is the individual who is authorized to make legally binding commitments for the applicant organization.

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5.3 Grant Coordinator Contact Information

For more information regarding the application process, please contact a MT DES Preparedness Grant Coordinator listed below:

Sarah Harmon	Pamela Fruh
SarahHarmon@mt.gov	Pam.Fruh@mt.gov
406-417-9354	406-439-5917

6.0 Evaluation Process:

FY2024 NSGP applications will be evaluated by MT DES staff through a review process to determine the application completeness and eligibility based on adherence to state and federal program guidance. MT DES utilizes scoring criteria established by FEMA when reviewing and ranking submitted applications. The project applications will be reviewed for project relevance to the mission areas outlined in the Notice of Funding Opportunity (NOFO).

Ranked applications will be included in the State of Montana NSGP application to FEMA. Final awards are determined by FEMA. Applications that meet all the elements listed in the NOFO are not guaranteed funding.

7.0 Funding Restrictions

Federal funds made available through this award may only be used for the purpose set forth in the Notice of Funding Opportunity (NOFO) 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.

8.0 Environmental Planning and Historic Preservation (EHP) Compliance

Subrecipients proposing projects that have the potential to impact the environment, including but not limited to construction, modification, renovation of existing buildings, structures, and facilities must participate in the DHS/FEMA EHP review process. This includes any changes to the structure such as adding security cameras, security doors, security glass, etc. Projects selected for award will work with MT DES to submit project information for EHP review. All relevant sections of the FEMA EHP form must be submitted to MT DES along with all other pertinent project information within 90 days of the period of performance start date. Failure to provide requisite information could result in delays in the release of grant funds. MT DES will work with Grant Programs Directorate for EHP approval.

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9.0 Build America, Buy America Act (BABAA)

All awarded sub-recipients must comply with the Build America, Buy America Act (BABAA), which was enacted as part of the Infrastructure Investment and Jobs Act §§ 70901-70927, Pub. L. No. 117-58 (2021); and Executive Order 14005, Ensuring the Future is Made in All of America by All of America's Workers. This requires that any funds used for a project for infrastructure utilizing iron and steel, manufactured products, and construction materials should be produced in the United States. This preference only applies to articles, materials, and supplies that are consumed in, incorporated into, or affixed to an infrastructure project.

As such, it does not apply to tools, equipment, and supplies, such as temporary scaffolding, brought to the construction site and removed at or before the completion of the infrastructure project. Nor does it apply to equipment and furnishings, such as movable chairs, desks, and portable computer equipment, that are used at or within the finished infrastructure project but are not an integral part of the structure or permanently affixed to the infrastructure project.

For more information or to see if a project is considered an infrastructure program, please see: [Programs and Definitions: Build America, Buy America Act | FEMA.gov](#)

Or contact a MT DES Grant Coordinator.

10.0 Procurement

All FEMA awards are subject to the federal procurement standards under the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* found at [2 C.F.R. § 200.317-200.327](#). Applicants selected for funding does not constitute award. Any costs incurred or obligated prior to the execution of an award are not allowed.

When purchasing under a FEMA award, a **non-state entity** must have and use documented procurement procedures, consistent with state, local, and Tribal laws and regulations and conforming to applicable federal law and the procurement standards identified in [2 C.F.R. § 200.317-200.327](#). For a **non-state entity**, where a difference exists between a federal procurement standard and a state, local, and/or Tribal procurement standard or regulation, the **non-state entity** must apply the most restrictive standard.

MT DES may request a copy of an entity's own documented procurement procedures which reflect applicable state and local laws and regulations. Procurement procedures must conform to applicable Federal law and the standards identified in [2 C.F.R. § 200.318](#)

More information on Federal Procurement standards can be found in [2 C.F.R. Part 200](#)

For more information on MT Procurement laws, rules, policies, and executive orders please visit [State Procurement Bureau](#).

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11.0 Funding Guidelines

The following information outlines general allowable and unallowable NSGP costs (see the full NOFO for more detail):

11.1 Allowable Costs

9.1.1 Planning

Funding may be used for security or emergency planning expenses and 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 individuals with access and functional needs as well as those with limited English proficiency.

Examples of allowable planning activities:

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

9.1.2 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. 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)

These categories can be found on DHS AEL at <http://www.fema.gov/authorized-equipment-list>.

9.1.3 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. An After-Action Report (AAR) and Improvement Plan (IP) is required to be submitted to MT DES for any exercise funded with NSGP funds.

9.1.4 Construction and Renovation

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NSGP funding may not be used for construction and renovation projects without prior written approval from DHS/FEMA. All subrecipients must request and receive approval from DHS/FEMA before any NSGP funds are used for any construction or renovation. Subrecipients using funds for construction projects must comply with the [Davis-Bacon Act](#) (40 U.S.C. subsection 3141 et seq.).

9.1.5 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 training, Active Shooter training, and emergency first aid training.

9.1.6 Contracted Security

Contracted security personnel are allowed under this program, but the nonprofit organization must be able to sustain this capability in future years without NSGP funding. A sustainment plan will be required as part of the closeout package for any award funding this capability. Contracted security costs described in the application 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 subrecipients 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 [https://www.fema.gov/sites/default/files/2020-04/Price Wavier Act Clarification IB 421B GPD Approved.pdf](https://www.fema.gov/sites/default/files/2020-04/Price_Wavier_Act_Clarification_IB_421B_GPD_Approved.pdf)

11.2 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

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- Initiatives that do not address the implementation of program/initiatives to build prevention and protection-focused capabilities directed at identified facilities and/or the surrounding community
- The development of risk/vulnerability assessment models
- Initiatives that fund risk or vulnerability security assessments or the development of the application
- Initiatives in which Federal agencies are the beneficiary or that enhance Federal property
- Initiatives which study technology development
- Initiatives that duplicate capabilities being provided by the Federal Government
- Organizational operating expenses
- Reimbursement of pre-award security expenses

Prohibition on Telecommunication, Video Surveillance Equipment and Services

Subrecipients may not use any FEMA funds to procure or obtain China made or China affiliated telecommunication, video surveillance equipment or services. Reference FEMA policy #405-143-1 https://www.fema.gov/sites/default/files/documents/fema_prohibitions-expending-fema-award-funds-covered-telecommunications-equipment-services.pdf

Please reference the System for Award Management (SAM) for a consolidated exclusion list of subsidiaries of telecommunication companies <https://sam.gov/SAM/>. Please contact your MT DES grant coordinator to determine if equipment or services is eligible under this program.

12.0 Subrecipient Award

Applicants that are awarded NSGP funds will be notified by MT DES. Funds will remain on hold until the subrecipient formally accepts the award within 45 days of notification. All successful applicants are required to comply with DHS Standard Terms and Conditions, as part of the award agreement. Subrecipients must report on progress towards implementing projects described in their applications on a quarterly basis.

13.0 Performance Progress Reports

Performance progress reports are required to be completed and submitted in AmpliFund by the 10th day following the end of each quarter.

- January 10th
- April 10th
- July 10th
- October 10th

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14.0 Reimbursement Process

The NSGP grant is a reimbursement-based model: funding is provided to grant recipients **after** expenses have been incurred. To receive reimbursement, payment requests must be submitted through the AmpliFund grant management system. MT DES will provide sub-recipients with information regarding the payment request process following the award of funding. Payment requests must include the following supporting documentation:

- Invoices/purchase orders outlining costs for any equipment/materials purchased
- Proof of payment as identified in a general ledger/financial report
- If a credit card is used for a purchase, a credit card statement showing proof of payment is needed

MT DES will process payment requests within 30 days of receiving the payment request in the AmpliFund grant management system.

If the organization does not currently have a vendor ID with the State of Montana, one may be requested.

To request a vendor ID through MT DES, the organization must fill out [IRS Form W-9](#). The Federal Employer Identification Number (FEIN) is needed when filling out IRS Form **W-9**. To establish electronic funds transfer for reimbursement, [State of Montana Form 204](#) must be filled out and returned to MT DES. Following award of federal funds, MT DES can provide these forms to the sub-recipient.