

Nonprofit Security Grant -State Program

**FY 2020
State Guidance**



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Montana Disaster and Emergency Services

FY2020 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) Number

97.008

Title: Nonprofit Security Grant Program

Catalog of Federal Domestic Assistance (CFDA)

CFDA Title: Emergency Management Performance Grants (EMPG)

CFDA Number: 97.042

Notice of Funding Opportunity Number

EMW-2020-UA-00019

Applications

Applications may be obtained at <http://readyandsafe.mt.gov/Home/Articles/nonprofit-security-grant-program> or by emailing bhonzel@mt.gov.

Period of Performance:

1 October 2020 – August 31, 2023 (estimated)

NOTE: Changes to the FY20 Notice of Funding Opportunity Guidance may result in modifications to this document.

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Overview – Nonprofit Security Grant – State (NPSG-S)

A. Program Overview, Objectives and Priorities

Overview:

The Nonprofit Security Grant Program-State (NSGP-S) 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 FY19, each state will receive an allocation for nonprofit organizations located outside the Urban Area Security Initiative designated urban areas.

Applicants may apply for up to a maximum of \$100,000.

At the date of publication of this document, the Department of Homeland Security (DHS) has not released the FY19 NPSG Notice of Funding Opportunity (NOFO). Release of the NOFO is expected on or around April 16, 2019 and any changes will be updated at www.readyandsafe.mt.gov.

Objectives:

The objectives of the grant are to support the 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

Priorities:

The FY 2019 NSGP provides funding support for physical security enhancements and other security activities to nonprofit organizations that are at high risk of a terrorist attack.

B. 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 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
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Eligible nonprofits must apply for the FY2019 NSGP-S through the State Administrative Authority (SAA), Montana Disaster and Emergency Affairs Division (MT DES).

C. Cost Share

There is NO cost share requirement for this grant.

D. NSGP-S Application:

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

1. NSGP Investment Justification (IJ) (Excel 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 as 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
- 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. As part of the threat assessment, police findings/reports and insurance claims should be included as part of the justification.

3. Mission Statement

Each sub-applicant 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, MT DES 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;
- 4) Other.

The organization type is a factor when calculating the final score of the application.

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E. Funding Restrictions

Federal funds made available through this award may only be used for the purpose set forth in the 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.

F. Environmental Planning and Historic Preservation (EHP) Compliance

Recipients 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. Projects selected for award will work with MT DES to submit project information for EHP review.

G. Procurement

Recipients of Federal grant funds must comply with the Federal procurement requirements when spending grant funds. Procurement standards can be found in 2 CFR Part 200 <https://www.gpo.gov/fdsys/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-part200.pdf>. Select requirements under these standards is listed in the NOFO (pages 29 – 32) https://www.fema.gov/media-library-data/1526585999645-b157aa32e8dda49c604e82c6202b6d7e/FY_2018_NSGP_NOFO_051718_508.pdf

H. New Prohibition Memorandum

Please see the attached memorandum on - Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services.

I. Funding Guidelines

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

Allowable Costs

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

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

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:

- 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>.

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 and Improvement Plan is required to be submitted to MT DES for any exercise funded with NSGP funds.

Construction and Renovation

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

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.

Unallowable Costs

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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 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 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

J. Application Process:

Eligible nonprofit applicants will complete and submit the FY2019 Montana NSGP-S application to MT DES. Applications will be accepted for review until May 10, 2019 at 5PM. Please send completed application via email to bhonzel@mt.gov.

For more information regarding the NSGP-S please refer to the FY18 Notice of Funding Opportunity located at https://www.fema.gov/media-library-data/1526585999645-b157aa32e8dda49c604e82c6202b6d7e/FY_2018_NSGP_NOFO_051718_508.pdf

For more information regarding the application process, please contact Burke Honzel, MT DES Preparedness Bureau Chief, at bhonzel@mt.gov or 406-324-4771.

K. Subrecipient Award

Applicants that are awarded NSGP-S funds, will be notified by MT DES. Funds will remain on hold until the sub-recipient formally accepts the award within 90 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.

Award agreements will provide more detail on reporting, reimbursement and monitoring of projects.

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L. Reimbursement Process

This is a reimbursement grant; you must always show proof of payment in order to be reimbursed.

- a. complete reimbursement form - please see appendix 2
- b. attach all applicable invoices
- c. attach proof of payment – typically a ledger showing the requested reimbursement items have been paid by your organization
- d. if you are using a credit card or bank card to purchase items, we would need you to show that you paid the credit card.
- e. Email the above package of information to your MT DES grant coordinator, we recommend you utilize email read receipt for this. Be sure to keep a copy of everything in your grant's binder.
- f. Once we receive the package of information, we will review it. If we have questions or need further information, we will contact you.
- g. You can typically expect to receive a payment within 30 days of a completed request for reimbursement.

If your organization does not currently have a vender ID with the State of Montana:

To get a vendor ID you will need your FEIN or SS number, you must fill out a W9. If you want to be paid by EFT, you will need to fill out Form 204. MT DES can provide these forms upon request.

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Appendix 1

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