

FY 2023 Nonprofit Security Grant

Nonprofit Security Grant - State Program

**FY 2023
State Guidance**

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FY 2023 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 Monday, January 9, 2023.

Application deadline is Friday, March 10, 2023, at 11:59 PM.

Period of Performance:

1 October 2023 – August 31, 2026

NOTE: Changes to the FY23 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 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 FY23 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 2023 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:

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 as the time of application. 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 two-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 site that IJ is based. As part of the threat assessment, police findings/reports and insurance claims should be included as part of the justification.

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4.3 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 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.

5.0 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.

6.0 Environmental Planning and Historic Preservation (EHP) Compliance

Subrecipients proposing projects that have the potential to impact the environment, including but not limited to sonar devices, 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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7.0 Procurement

Subrecipients 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.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>

8.0 Funding Guidelines

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

8.1 Allowable Costs

8.1.1 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

8.1.2 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>.

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8.1.3 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.

8.1.4 Construction and Renovation

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.).

8.1.5 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.

8.1.6 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 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 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%20Waiver%20Act%20Clarification%20IB%20421B%20GPD%20Approved.pdf)

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8.2 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
- 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

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 grant coordinator to determine if equipment or services is eligible under this program.

9.0 Application Process:

Eligible nonprofit applicants will complete and submit the FY 2023 Montana NSGP application to MT DES. Applications open January 9, 2023, and the deadline is March 10, 2023 at 11:59 PM. Note that Changes to the FY23 Notice of Funding Opportunity Guidance may result in modifications to this Deadline date.

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Please send completed application via email to mtdesprep@mt.gov

For more information regarding the NSGP please refer to the FY 2023 Notice of Funding Opportunity located at <https://des.mt.gov/Grant-Programs/Nonprofit-Security-Grant-Program-NSGP>

9.1 Unique Entity Identifier (UEI)

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

9.2 Applicant Agent or Authorized Representative

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

9.3 Electronic Signature

Applications submitted to MT DES constitute a submission as electronically signed applications. When submitting the application, the name of the applicant's authorized representative will be typed into the certification block.

9.4 Grant Coordinator Contact Information

For more information regarding the application process, please contact an MT DES grant coordinator below:

Preparedness Grant Coordinator, Justin Webster – (406) 417-9352 – Justin.Webster@mt.gov

10.0 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.

11.0 Amplifund

While the application is required to be submitted in the PDF format provided by FEMA, once a subrecipient receives their award package we will set up your sub award in the **Amplifund** system and coordinate with you to get you signed up and into the system.

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12.0 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

13.0 Reimbursement Process

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

- Complete your payment request through the Amplifund system
<https://mt.amplifund.com/account/Login.aspx>
- Attach all applicable invoices
- Attach proof of payment – typically a general ledger/financial report showing the requested reimbursement items have been paid by your organization
- If you are using a credit card or bank card to purchase items, we would need you to show that you paid the with credit card.
- Once we receive your payment request in Amplifund, we will review it. If we have questions or need further information, we will contact you.
- You can typically expect to receive a payment within 30 days of a completed payment 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 Federal Employer Identification Number (FEIN) or social security number, you must fill out a **W9**. If you want to be paid by electronic funds transfer, you will need to fill out **Form 204**. MT DES can provide these forms upon request.

14.0 Extension Requests

Grant amendments are required to significantly modify planned activities of this grant.

Any changes to the grant period of performance (PoP) will require a grant extension.

Subrecipients are provided with a 2-year PoP at the time of award. If additional time is needed to complete the project, it is possible that a one-year extension, at the most, may be approved.

Extension requests are made by filling out an amendment request in the **AmpliFund** system. A

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subrecipient may request an extension at any point during the period of performance. Allow for 30 days' notice prior to the implementation of the requested modification. Subrecipients should contact their MT DES Grant Coordinator with any questions regarding the extension process.

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Appendix 1

Helpful Hints for Nonprofits

Has the nonprofit organization/sub-applicant 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 requested 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