

## Appendix A

### NSGP Subapplicant Quick Start Guide

Nonprofit organizations should use the information in this appendix as a reference when preparing to submit applications under the NSGP.

#### What is the NSGP?

The NSGP is a competitive grant program appropriated annually through DHS and administered by FEMA. It is intended to help nonprofit organizations increase their physical security posture against [acts of terrorism as defined by law](#). Eligible organizations are registered 501(c)(3) nonprofits or otherwise are organizations as described under 501(c)(3) of the Internal Revenue Code (IRC) and tax-exempt under section 501(a) of the IRC. More information on tax-exempt organizations can be found at: <https://www.irs.gov/charities-non-profits/charitable-organizations>.

#### How to Apply

To apply for NSGP funds, interested nonprofit organizations must apply through their SAA. Each SAA has an established application submission process with a state-specific deadline to submit all required materials. ***The application submission deadline in the funding notice applies to the SAA and is the deadline for SAAs to submit all administratively reviewed application materials to FEMA.*** You will need to contact your SAA point of contact on state-specific deadlines and supplemental application materials or requirements unique to your state. The list of SAAs can be found at: <https://www.fema.gov/grants/preparedness/state-administrative-agency-contacts>.

Nonprofit organizations must fully answer each question in all the sections of the Investment Justification(s). In their Investment Justification, nonprofit organizations should summarize the most critically important, impactful, and salient information. You may submit up to three (3) Investment Justifications, which function as an application document, per organization for up to three (3) unique physical locations/addresses. You must submit one (1) unique Investment Justification form and required documents as part of a complete submission package for each physical location/unique address. Each Investment Justification can request up to \$150,000 per location for a total of \$450,000 across three Investment Justifications for three unique physical locations/addresses. The amount of funding requested, and number of submissions, may **not** exceed these limits.

Nonprofit organizations applying after April 4, 2022, must have a Unique Entity Identifier (UEI), which is obtained through [SAM.gov](#). Nonprofit organizations must only register in SAM.gov to obtain the UEI **but are not required to go through the full SAM.gov registration process and are not required to obtain or maintain an active registration in SAM.gov**. Guidance on obtaining a UEI in SAM.gov can be found at [GSA UEI Update](#) and [SAM.gov Update](#).

***Tip:*** For FY 2022, NSGP has three funding streams: NSGP-State (NSGP-S), NSGP-Urban Area (NSGP-UA), and Community Project Funding (CPF). Identify and apply for the proper funding stream (NSGP-S, NSGP-UA, or CPF) based on the physical geographical location/address of the facility or specific project. A full list of eligible high-risk urban areas is included in this funding notice. Contact your [SAA](#) for questions about the appropriate funding stream based on our organization's location. Applications submitted to the incorrect funding stream will not be considered.

## NSGP-S and NSGP-UA Application Elements

The following materials, including any additional required or requested materials specific to the state, must be submitted to the SAA as part of a complete application package. A submission that is missing any required document(s) will be considered incomplete and will not be reviewed.

- **Mission Statement**

A mission statement is a formal summary of the aims and values of an organization. The three components of a mission statement include the purpose, values, and goals of the organization. The provided statement should discuss the “who, what, and why” of your organization.

*Tip: It is highly recommended that the Mission Statement is documented on official letterhead. This element helps inform and validate a nonprofit organization’s categorical self-identification based on its ideology, beliefs, mission, function, or constituency served/supported.*

- **Vulnerability Assessment**

A vulnerability assessment is used to identify and validate physical security deficiencies of your organization/facility and is the foundation of an NSGP application. Vulnerability assessments can be provided in the form of a Cybersecurity and Infrastructure Security Agency (CISA) Self-Assessment ([Facility Security Self-Assessment | CISA](#)), State or Local Law Enforcement Assessment, Contractor Assessment, or other valid method of assessment. The SAA may require a specific format/type of vulnerability assessment, so be sure to review the state-specific guidelines for their application requirements. The vulnerability assessment is uniquely different than a risk/threat assessment: in essence, a risk assessment involves looking outside of an organization to determine external threats that exist that could potentially lead to security issues, whereas a vulnerability assessment involves looking inside the organization for internal vulnerabilities and weaknesses. Projects/activities requested through the NSGP should align to mitigate items identified in the vulnerability assessment.

*Tip: In preparation to describe how they intend to use NSGP grant funding, nonprofit organizations should think broadly and holistically in their approach to security measures designed to protect buildings and safeguard people. Some physical security control examples include locks, gates, and guards (e.g., contract security). While these may be effective measures, there are many additional layers to physical security that can help, including creating comprehensive physical security plans, conducting training and exercises (e.g., active shooter and evacuation), identifying countermeasures against intrusion (e.g., access controls), preventing physical security breaches (e.g., security enhanced doors/windows), and reducing physical security threats (e.g., cameras/surveillance). Descriptions of allowable costs and activities can be located in this funding notice and the [PGM](#). Unallowable costs will not be reimbursed.*

- **Investment Justification**

The Investment Justification is a fillable template provided and required by FEMA (which will be made available through [Grants.gov](#)) that asks nonprofits to describe the organization, the organization’s risks/threats, and proposed projects/activities to mitigate security deficiencies (as identified in the vulnerability assessment) utilizing NSGP funding.

- **Supplemental Documents**

Each state is unique in how they manage and administer the NSGP. The SAA may require specific supplemental documents or templates in addition to those required by FEMA as part of the state's internal NSGP application submission requirement. However, when preparing the Investment Justification, organizations must answer questions completely and cannot rely on references to or cite page numbers of any supplemental documents as they are not submitted to nor reviewed by FEMA. Only the Investment Justification is submitted to FEMA by the SAA.

*Tip: Contact your [SAA](#) for unique, state-specific submission requirements.*

### **Scoring and Funding Recommendations**

Upon submission of your completed application to the SAA, the state will review, score, and rank every complete application it has received from eligible nonprofit organizations. The results of the scoring process will be forwarded to FEMA and will inform the federal review of the Investment Justifications based on the criteria outlined in this funding notice. Following the federal review and based on a combination of state and federal scoring, nonprofit organizations are recommended for funding. The final list of recommended nonprofit organizations to be funded is provided to the Secretary of Homeland Security for final approval.

### **Investment Justification Checklist**

Nonprofit organizations must fully answer each question in all the sections of the Investment Justification(s) for the form to be considered complete. In their Investment Justification, nonprofit organizations should summarize the most critically important, impactful, and salient information. The Investment Justification is the only document submitted to FEMA by the SAA and should be crafted using the identified threats/risks to your organization, the results of the vulnerability assessment of a physical location/structure/building, and details of the requested projects/activities to mitigate or remediate those vulnerabilities with associated estimated costs. ***Nonprofit organizations should describe their current threat/risk. While historic risk may be included for context, the Investment Justification should focus on current threats and risks.***

***Reminder: Applicants may submit up to three (3) Investment Justifications with one (1) unique Investment Justification form and required documents for each unique physical location/address. Each Investment Justification can request up to \$150,000 per location for a total of \$450,000 across three unique physical locations/addresses. The amount of funding requested, and number of submissions, may not exceed these limits.***

Below is the Investment Justification Checklist that includes the required contents of a complete NSGP Investment Justification:

#### **Section I – Applicant Information**

- Legal Name of the Organization/Physical Address of the Facility/County
- Year the Original Facility was Constructed
- Owning vs. Leasing/Renting and Permission to Make Enhancements
- Year the Organization Began Operating from the Facility
- Other Organizations in Facility
- Mission Statement Summary
- Membership/Population Served
- Organization Type

- Organization's Affiliation
- 501(c)(3) Tax-Exempt Designation
- UEI obtained via the [System for Award Management](#)
- Funding Stream
  - Designated high-risk urban area (if applicable)
- Federal Funding Request (total estimated cost of projects/activities)
- Investment Phase (new or continuation)

### **Section II – Background**

- Describe the symbolic value of your organization's site as a highly recognized national or historical institution, or significant institution within the community that renders the site a possible target of terrorism.
- Describe any role in responding to or recovering from terrorist attacks, specifically highlighting the efforts that demonstrate integration of nonprofit preparedness with broader state and local preparedness efforts.

### **Section III – Risk**

- **Threat:** Describe the identification and substantiation of specific threats, incidents, or attacks against the nonprofit organization or a closely related organization, network, or cell (examples include police report, insurance claim, internet threats, etc.).
- **Vulnerability:** Describe your organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist attack.
- **Consequence:** Describe potential negative effects/impacts on your organization's assets, systems, and/or function if disrupted, damaged, or destroyed due to a terrorist attack.

### **Section IV – Facility Hardening**

- Describe how the proposed projects/activities will harden (make safer/more secure) the facility and/or mitigate the identified risk(s) and/or vulnerabilities based on the vulnerable assessment
- Describe how the proposed target hardening focuses on the prevention of and/or protection against the risk/threat of a terrorist attack.
- Confirm that the proposed projects are allowable in accordance with the priorities of the NSGP ([Funding Notice](#), [PGM](#)).
- Confirm that the proposed projects are feasible (meaning there is a reasonable expectation based on predicible planning assumptions to complete all tasks, projects and/or activities within the subaward period of performance) and proposed milestones under the NSGP.

### **Section V – Milestones**

- Describe any key activities that will lead to milestones in the program/project and grants management over the course of the NSGP grant award period of performance.

### **Section VI – Project Management**

- Describe the proposed management team's roles, responsibilities, and governance structure to support the implementation of the projects/activities.
- Assess the project management plan/approach.

## Section VII – Impact

- Describe the outcome and outputs of the proposed projects/activities that will indicate that the investment was successful.

## Funding History

- Include past funding amounts and projects under NSGP.

## Definitions

- **Vulnerability Assessment**: The vulnerability assessment is a documented review of your facility that identifies gaps in security. Addressing gaps as they are identified in the vulnerability assessment keeps a facility and its users safer. This document is the foundation of an NSGP application.
- **Subapplicant/Subrecipient**: Individual nonprofit organizations are considered the subapplicants or the subrecipients of the NSGP grant; the SAA is the primary applicant and recipient. Each nonprofit organization must individually submit an application to their SAA, which will then submit it to FEMA for consideration, but the award itself will be made directly to the state or territory's SAA. The SAA will then manage the grant and be the main point of contact for the nonprofit organizations for everything related to their grant award.
- **Period of Performance**: The period of performance is the length of time that recipients and subrecipients have to implement their project(s), accomplish all goals, and expend all grant funding. The period of performance under the NSGP is 36 months for SAAs. However, given the SAA has a high level of administrative burden in managing the NSGP, typically a shorter period of performance than 36 months is given to nonprofit subrecipients. There may be situational extensions to the period of performance based on undue hardships, but recipients and subrecipients should not assume any extensions will be granted and plan for full project completion within the designated period of performance. **All costs must be incurred, and all services or goods must be completed or delivered within the period of performance.** Unless the subrecipient and SAA have requested and received approval from FEMA for pre-award costs, any expenditures made prior to official notification of award from the SAA and before the start of the subrecipient's period of performance will be considered unallowable.
- **High-Risk Urban Area**: High-risk urban areas are metropolitan locations designated in FEMA's Urban Area Security Initiative (UASI) program each year based on the 100 most populous metropolitan statistical areas (MSAs). Nonprofit organizations with physical locations in one of those high-risk urban areas are eligible under the NSGP-UA program; all other nonprofits are eligible under the NSGP-State program. The list of high-risk urban areas under UASI changes every year based on risk. A list of eligible high-risk urban areas will be included in each year's NSGP funding notice. Because high-risk urban areas often extend beyond the local city limits and because the localities included within the corresponding MSA are not always included in the high-risk urban area, contact your SAA to confirm whether your organization is located within a designated high-risk urban area for the purposes of the NSGP-UA program. If a nonprofit does not apply for the correct funding stream based on location, the application will be automatically determined ineligible.
- **State Administrative Agency (SAA)**: SAAs are the designated state and territory offices that manage the NSGP awards. These offices are the primary applicants to and recipients of NSGP funds. The SAA will make NSGP subawards to subrecipients (e.g., nonprofit organizations).

- **Risk**: Potential for an adverse outcome assessed as a function of hazard/threats, assets and their vulnerabilities, and consequence. In other words, nonprofit organizations should describe their current threat/risk of terroristic attack and how those identified vulnerabilities (in the vulnerability assessment) could potentially be exploited.
- **Threat**: Indication of potential harm to life, information, operations, the environment and/or property; may be a natural or human-created occurrence and includes capabilities, intentions, and attack methods of adversaries used to exploit circumstances or occurrences with the intent to cause harm.
- **Vulnerability**: Physical feature or operational attribute that renders an entity open to exploitation or susceptible to a given hazard; includes characteristic of design, location, security posture, operation, or any combination thereof, that renders an asset, system, network, or entity susceptible to disruption, destruction, or exploitation.
- **Consequence**: Effect of an event, incident, or occurrence; commonly measured in four ways: human, economic, mission, and psychological, but may also include other factors such as impact on the environment.
- **Terrorism**: Any activity that:
  1. Involves an act that: A) is dangerous to human life or potentially destructive of critical infrastructure or key resources; and B) is a violation of the criminal laws of the United States or of any State or other subdivision of the United States; and
  2. Appears to be intended to: A) intimidate or coerce a civilian population; B) influence a policy of a government by intimidation or coercion; or C) affect the conduct of a government by mass destruction, assassination, or kidnapping.
- **Equity**: 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, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.
- **Underserved Community**:
  - Per the [FEMA National Disaster Recovery Framework](#): groups that have limited or no access to resources or that are otherwise disenfranchised. These groups may include people who are socioeconomically disadvantaged; people with limited English proficiency; geographically isolated or educationally disenfranchised people; people of color as well as those of ethnic and national origin minorities; women and children; individuals with disabilities and others with access and functional needs; and seniors.
  - Per [Executive Order 13985](#): populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the preceding definition of “equity.”

Additional definitions can be found in the [DHS Lexicon Terms and Definitions](#).