NEW YORK STATE | Homeland Security and Emergency Services

FY2022 Nonprofit Security Grant Program (NSGP)
Frequently Asked Questions
(New and/or updated FAQs are highlighted in red;
Please check the DHSES website frequently for updates)

Eligibility:

Question: Who is eligible to apply for the FY2022 NSGP?

Answer: To be considered for funding, eligible organizations must:

- Be described under section 501(c)(3) of the Internal Revenue Code of 1986 and exempt from tax under section 501(a) of such Code.

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

- Be prequalified, through New York State Grants Management at the time of application submission: https://grantsmanagement.ny.gov/get-prequalified .

- Provide a current and valid Unique Entity Identifier (UEI) obtained via the System for Award Management (SAM). Applicants may request a UEI by visiting https://sam.gov/content/duns-uei.

  ➢ **Please note: if your organization is experiencing unexpected issues due to technical difficulties or backlogs in processing at SAM.gov resulting in a longer than anticipated timeframe in obtaining a UEI number, you will not be disallowed/disqualified from applying solely based on not having a UEI number at the time of application submission to DHSES. If your organization is selected by FEMA to receive funding, you must obtain and provide your UEI number prior to DHSES issuing your subaward (expected fall of 2022).**

- Be registered, have recently applied for registration or be exempt from registering with the NYS Attorney General's Office Charities Bureau. https://www.charitiesnys.com/charities_new.html

Question: My organization is a house of worship and is therefore exempt from registering as a 501(c)(3). Are we still eligible to apply?

> **Answer:** Yes. 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.

Question: Can I apply for multiple locations for the same organization?

> **Answer:** Yes, each nonprofit organization may apply for up to $150,000 per site, for up to three (3) sites, for a maximum award of $450,000 per organization. For each requested site you must:
>   a) Submit a separate E-Grants application specific to each site;
>   b) Submit a separate site-specific Investment Justification;
>   c) Submit a separate site-specific vulnerability assessment; and
>   d) Ensure that the total amount you are requesting for all locations does not exceed the maximum award allowed by the program

Question: Can an organization with sites located in both urban (UA) and state (S) areas apply to both programs?

> **Answer:** Yes, as long as the application cap and three site maximum per organization are not exceeded, and the information provided on each Investment Justification is completed according to the area for which you are requesting funding.

Question: Can multiple nonprofits that share a building/facility/physical structure/address each apply for funding?

> **Answer:** No, per page 6 of the Request for Applications (RFA), only one nonprofit can apply per building/facility/physical structure/address. However, the request and subsequent security enhancements may benefit nonprofits who cohabitate/operate in/from the same location. Multiple requests for federal assistance from the same physical address/building/facility/structure will all be deemed ineligible.

Question: Can an application be submitted for a new building that is under construction?

> **Answer:** No, per page 6 of the Request for Applications (RFA), you may only submit for existing sites that the organization occupies at the time of application.

Question: How is "site" defined under the program? Would multiple buildings owned by an organization located on a campus that share the same street address be considered one site or multiple sites?

> **Answer:** Each "site" must have a separate and distinct street address. Separate buildings that share the same numerical street address must be identified distinctly from one another, i.e., 123 Main Street-Building A, 123 Main Street-Building B, etc.

Question: Would a parking lot or piece of property without a building but used by a nonprofit be considered eligible to apply for funding?

> **Answer:** No. An eligible site requires a physical address and a building where people will congregate.

Question: What are some ways that a nonprofit organization can demonstrate that it is at a high risk of a terrorist attack?

> **Answer:**
> - Describe any incidents that have occurred at the facility.
> - Describe any threats (e.g., verbal threats, vandalization) made against the organization.
> - Describe current events with specific attention to incidents impacting organizations that have been targeted due to a similar mission, belief, or ideology.
> - Contact organizations/agencies that can provide information on the current threat environment, such as local law enforcement agencies, local emergency management offices, Federal Bureau of Investigation Field Offices, or Regional Protective Security Advisors. To reach a Protective Security Advisor, email Central@cisa.gov.

Requirements:

Question: What must be submitted to consider the application complete?

> **Answer:** To be considered for funding, eligible nonprofit organizations must submit an application using the State's Electronic Grants (E-Grants) System (see the Request for Applications - Exhibit A: E-Grants Instructions). A complete application includes the following:
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> - E-Grants Application Information:
>   - Contact Information
>   - Please provide at least two (2) contacts from your organization
>   - Proposed Project Workplan Information
>   - Please use Workplan language found in the E-Grants Tutorial
>   - Budget Request Information
>   - All requested projects must be clearly linked to security vulnerabilities identified in the vulnerability assessment
>   - Certification to Accept the Assurances
>
> - Required Attachments to Upload to the E-Grants Application:
>   - Completed site-specific FY2022 NSGP Investment Justification
>   - Status History report from Grants Gateway website showing prequalification status
>   - Mission Statement of the applying organization
>   - Vulnerability Assessment specific to the site listed on the Investment Justification.
>
>   - Please note that for **each** requested site, the applicant must provide:
>   - A separate E-Grants application
>   - A separate site-specific Investment Justification
>   - A separate site-specific vulnerability assessment **to include the site's address**

Question: Is a Vendor Responsibility Questionnaire required to be submitted with the application?

> **Answer:** No, a Vendor Responsibility Questionnaire is not required for your FY2022 NSGP application submission.

Question: What makes a strong Investment Justification?

    Answer:
- Clearly identified risks, vulnerabilities and consequences;
- Description of findings from a previously conducted vulnerability assessment;
- Details of any incident(s) including description, dates, etc.;
- A brief description of any supporting documentation (such as police reports or photographs) that is submitted as part of the application, if applicable;
- Explanation of how the investments proposed will mitigate or address the vulnerabilities identified from the submitted vulnerability assessment;
- Verification that all proposed activities are allowable costs per the FY2022 NSGP RFA;
- Realistic milestones that consider the Environmental Planning and Historic Preservation (EHP) review process, if applicable; and
- Description of the project manager(s) and level of experience.

Question: What qualifies as an acceptable vulnerability assessment?

    Answer: There is not a prescribed or required template for vulnerability assessments, however, please note the following requirements pertaining to vulnerability assessments:

- A separate site-specific vulnerability assessment must be provided for <u>each site</u> for which funding is requested;
- The vulnerability assessment must contain the site's physical address, which must match the physical address provided in the Investment Justification (IJ) and in the Work Plan of your E-Grants application;
- Each and every project being requested in the IJ must be clearly linked to a security vulnerability identified in the vulnerability assessment. Requested projects that are not reflected as vulnerabilities in the assessment <u>will not</u> be funded; and
- The vulnerability assessment must accurately and completely reflect the site's security vulnerabilities at the time your application is submitted.

There are several ways to obtain a vulnerability assessment, including but not limited to: requesting from a local police department or private vendor, conducting a self-assessment, etc.

Question: Should we submit proposals or quotes for requested projects with our grant application?

> **Answer:** No, proposals/quotes should not be submitted with your application, nor should they be sought without having an executed grant contract with DHSES. Cost estimates are sufficient for your application.

Allowable Expenses:

Question: Does allowable equipment include both interior and exterior projects?

> **Answer:** Yes, the equipment may be interior or exterior, provided it addresses an identified vulnerability of the site.

Question: What kinds of expenses would be allowed for contracted security personnel?

> **Answer:** Hiring of contracted security personnel is allowed under this program. NSGP funds may not be used to purchase equipment for contracted security. The sub-recipient 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. These costs should be classified as organization costs. Subrecipients may not use NSGP funding to hire full or part-time employees that will be placed on a nonprofit's payroll.
>
> The Homeland Security Act of 2002, as amended by the PRICE of Homeland Security Act limits the use of no more than 50 percent of an award for personnel activities unless a waiver is approved by FEMA. Nonprofit organizations that apply for and are awarded NSGP funds for contracted security personnel must count such costs towards the nonprofit organization's 50% personnel cap. FEMA will review an applicant's contracted security costs prior to award and if approved, will waive the 50 percent personnel cap as a term and condition of the award.

Question: If we are requesting to apply more than 50 percent of the award towards contracted security personnel costs, do we need to also submit a personnel cap waiver request with our application?

>   **Answer:** No, applicants wishing to submit for more than 50% in personnel costs may do so in their grant application. No additional procedures regarding exceeding the personnel cap are necessary for your application.

Question: Are Planning and Training considered two separate budget items?

>   **Answer:** Yes, Planning and Training projects should be identified separately in your IJ.

Question: Are Management and Administration costs allowed under this grant?

>   **Answer:** Per page 13 of the RFA: "M&A Activities are those costs defined as directly relating to the management and administration of NSGP funds, such as financial management and monitoring. Sub-recipients may use up to five percent (5%) of the FY2022 NSGP funds awarded to them by the State to be used solely for Management and Administration purposes associated with 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. Management and administrative 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 consequence 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."
>
>   M&A costs include the following categories of activities:
>
>   - Hiring of full-time or part-time staff or contractors/consultants responsible for activities relating to the management and administration of NSGP funds;
>
>   - Meeting-related expenses directly related to M&A of NSGP funds

Question: Can an existing employee be utilized for Planning or M&A activities?

> **Answer:** Yes, but only for time worked above and beyond their normal work schedule, otherwise this may be considered supplanting. Please also note that overtime and backfill are not allowable expenses.

Technical

Question: Can we use the Investment Justification (IJ) form from a prior year to submit our application?

> **Answer:** No. Make sure to use the FY2022 Nonprofit Security Grant Program Investment Justification template, available here: https://www.dhses.ny.gov/nonprofit-programs, to submit your application. Submission of any other IJ template or changing the IJ from its original fillable PDF format will not be accepted.

Question: Is the Streamlined Prequalification Questionnaire that was available through the NYS Securing Communities Against Hate Crimes (SCAHC) Grants also acceptable for prequalification for a nonprofit seeking to apply for the federal FY2022 Nonprofit Security Grant Program (NSGP)?

> **Answer:** No. The Streamlined Prequalification process was *only* applicable to the Securing Communities Against Hate Crimes program. All applicants of the FY2022 Nonprofit Security Grant Program (NSGP) must use the traditional prequalification process, available here: https://grantsmanagement.ny.gov/get-prequalified.

Question: One of the documents that needs to accompany our grant application for FY2022 is documentation that we are prequalified. Where do I obtain such documentation?

> **Answer:** Please refer to pages 60-62 of the E-Grants Tutorial for instructions on how to obtain the required documentation to demonstrate prequalification status. The E-Grants Tutorial can be found with the application documents on the DHSES website: https://www.dhses.ny.gov/nonprofit-programs.

Question: What is the correct funding year to select in the E-Grants application?

> **Answer:** Make sure you select **2022** as the funding year in E-Grants for the FY2022 Nonprofit Security Grant Program, as this round of funding is sourced from the federal fiscal year (FFY) 2022 budget. **Selecting the wrong year will invalidate your application.**

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Question: Regarding Funding History listed on the Investment Justification, how far back (in terms of years) should an organization go in listing past NSGP funding?

> **Answer:** You should list ALL years of NSGP funding that an organization has received.

Question: How will bonus points for new recipients be assessed?

> **Answer:** Nonprofit organizations that have not previously received NSGP funding will have 15 points added to their project score.

Question: How will bonus points for underserved communities be assessed?

> **Answer:** To advance considerations of equity in awarding NSGP grant funding, FEMA will add additional points to the scores of organizations that are located in historically underserved or disadvantaged communities. FEMA will apply the CDC's Social Vulnerability Index tool to each applicant and will add ten (10) points to applications from organizations in communities with a "High" SVI ranking (.60 - .79) and fifteen (15) points to applications from organizations in communities with a "Very High" SVI ranking (.80 – 1.0).

Question: What is the application due date for nonprofit organizations to apply to the FY2022 NSGP?

> **Answer:** Applications must be submitted via the DHSES E-Grants System by 5:00 PM on May 31, 2022. **No extensions will be granted.**