



# Homeland Security and Emergency Services

## Nonprofit Security Grant Program National Security Supplemental (NSGP-NSS)

### 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 NSGP-NSS?

**Answer:** To be considered for funding, eligible organizations, including those represented in a consortium, 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.
- Demonstrate, through the application, that the organization is at risk of a terrorist or other extremist attack.
- Be prequalified, through the New York Statewide Financial System (SFS) prior to application submission <https://grantsmanagement.ny.gov/get-prequalified>.
  - If applying as a consortium, please note that **all organizations** represented in the application must be prequalified in SFS.
- Provide a current and valid Unique Entity Identifier (UEI) with the application. Organizations should verify that they have a UEI number, or take the steps necessary to obtain one, as soon as possible. Applicants may request a UEI by visiting <https://sam.gov/content/duns-uei>.
  - If applying as a consortium, please note that **all organizations** represented in the application are subject to this eligibility requirement.
  - **Please note: You will not be disallowed/disqualified from applying solely based on not having a UEI number at the time of application submission to DHSES. However, if your organization is selected by FEMA to receive funding, you must obtain and provide your UEI number prior to DHSES issuing your subaward. It is therefore recommended to start the process of obtaining a UEI as soon as possible if you have not already done so.**



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- 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](https://www.charitiesnys.com/charities_new.html).
  - If applying as a consortium, please note that **all organizations** represented in the application are subject to this eligibility requirement.

**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:** I work with a nonprofit organization interested in applying for funds through the NSGP-NSS Program. Our organization is a nonprofit organization, registered with the NYS Charities Bureau and registered and pre-qualified in the New York Statewide Financial System (SFS), but we are a 501(c)(5) tax classification, not a 501(c)(3). Is this a disqualifying factor?

**Answer:** Eligible organizations must meet all of the criteria listed in the RFA, including being described under section 501(c)(3) of the Internal Revenue Code of 1986 and exempt from tax under section 501(a) of such Code. 501(c)(5) organizations do not meet those criteria.

**Question:** Can multiple organizations apply for funding as a consortium?

**Answer:** Yes. For the NSGP-NSS, a consortium of eligible nonprofit organizations is also an eligible applicant. A consortium application is an opportunity for an eligible nonprofit organization to act as a lead and apply for funding on behalf of itself and any number of other eligible nonprofit organizations. The lead nonprofit organization must fill out the Investment Justification (IJ) to represent the collective of the consortium. Additionally, consortium applicants are required to fill out and submit a Consortium Workbook to DHSES which captures the necessary data for all participating consortium nonprofit organizations. The Consortium Workbook can be found at the following link: <https://www.dhSES.ny.gov/nonprofit-programs>. All nonprofit organizations in the consortium application must be compliant with the NSGP-NSS eligibility requirements listed above. **Nonprofit organizations may not apply both individually and as part of a consortium.** The lead nonprofit organization and its partners must be the intended beneficiaries of the requested funding. The lead nonprofit organization shall not



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distribute grant-funded assets or provide grant-funded contractual services to non-compliant partner nonprofit organizations or other ineligible organizations.

**Note:** *If successful, the lead consortium member will accept the subaward on behalf of the consortium, implement the approved projects/contracts for all consortium member sites, and manage the subaward throughout the period of performance, to include ensuring that all terms and conditions of the subaward are met.*

**Question:** Can I apply for multiple sites for the same organization?

**Answer:** Yes. Nonprofits with multiple sites may apply for additional sites at up to \$200,000 per site for a maximum of three (3) sites located within the NSGP-NSS-UA area and three (3) sites located within the NSGP-NSS-S area, for a maximum of six (6) sites total, not to exceed a grand total of \$600,000 per organization. A nonprofit organization with locations in multiple states may apply for up to these application limits within *each* state. 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

Consortium applications are also eligible under the NSGP-NSS. In this case, an eligible entity would apply on behalf of themselves and other eligible entities as an applicant. A Consortia may apply for an award totaling \$1 million. The \$200,000 per site maximum still applies for each individual nonprofit organization within the consortium. If successful, the lead consortium member will accept the subaward on behalf of the consortium, implement the approved projects/contracts for all consortium member sites, and manage the subaward throughout the period of performance, to include ensuring that all terms and conditions of the subaward are met.

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

**Answer:** No. Per page 8 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.



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

**Answer:** No. Per page 7 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 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 or other extremist 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](mailto:Central@cisa.gov).



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## 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:

- 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 NSGP-NSS Investment Justification (IJ) in the **original fillable PDF format with all fillable fields and drop-downs enabled**
  - Grants Information report showing prequalification status in the SFS System
  - Mission Statement(s) of all applying organizations
  - Vulnerability Assessment(s) specific to all sites identified in the application
  - Completed NSGP-NSS Consortium Workbook, **only if** applying as a consortium
  - 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**, and consortia applications must include a separate vulnerability assessment for each site requested in the application.

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

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



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**Question:** What makes a strong Investment Justification?

**Answer:**

- Clearly identified risks, including threats, vulnerabilities and consequences;
- Description of findings from a previously conducted vulnerability assessment;
- Details of any incident(s) including description, dates, etc.;
- 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 NSGP-NSS 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 **each site** for which funding is requested;
- The vulnerability assessment must contain the site's **physical address**, which must match the physical address provided in the IJ and in the Workplan 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 will not be funded;**
- The vulnerability assessment must accurately and completely reflect the site's security vulnerabilities at the time your application is submitted. An assessment containing outdated or inaccurate information may be considered invalid;
- If applying as a consortium, **individual** vulnerability assessments for **each** nonprofit/site in the consortium must be submitted.



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- 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:** Are all projects listed in the dropdown menu of Section IV-B of the Investment Justification template (IJ) allowable?

**Answer:** Per FEMA, all listed projects in this section are allowable. Please note that all projects you are requesting must be clearly linked to vulnerabilities identified in your submitted vulnerability assessment(s).

**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-SS funds may not be used to purchase equipment for contracted security. The sub-recipient should be able to sustain this capability in future years without NSGP-SS funding. 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. Subrecipients may not use NSGP-NSS funding to hire full or part-time employees that will be placed on a nonprofit's payroll. NSGP-NSS funds may not be used to support security personnel costs that the organization already had in their budget prior to the grant award, as this would be considered supplanting.



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Please note that, beginning in FY2024, the 50 percent personnel cap, as identified by the PRICE Act, will no longer apply to NSGP-NSS funding. For purposes of your NSGP-NSS application, applicants may request any amount of contracted security personnel costs, within the application limits, provided this request is supported by information provided in the submitted vulnerability assessment.

**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. The previous 50% personnel cap no longer applies to the NSGP.

**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 pages 18-19 of the RFA: "M&A Activities are those costs defined as directly relating to the management and administration of NSGP-NSS funds, such as financial management and monitoring. Sub-recipients may use up to five percent (5%) of the NSGP-NSS 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-NSS 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:

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- Hiring of full-time or part-time staff or contractors/consultants responsible for activities relating to the management and administration of NSGP-NSS funds;
- Meeting-related expenses directly related to M&A of NSGP-NSS 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.

**Question:** Does the NSGP-NSS allow for cybersecurity related projects?

**Answer:** The NSGP-NSS allowable costs are focused on facility hardening and physical and cybersecurity enhancements. Information regarding allowable cybersecurity projects, as well as all other allowable projects, can be found on pages 13 and 14 of the Request for Applications (RFA). For further information on allowable equipment projects, please see the NSGP-NSS Authorized Equipment List, available here: <https://www.dhSES.ny.gov/nonprofit-programs>.

**Question:** We would like to make announcements throughout the building via a loudspeaker. Are Public Address (PA) Systems restricted to only being handheld, mobile and/or portable?

**Answer:** Yes, allowable public address systems must be handheld, mobile and/or portable. This means no PA system can be affixed to the building, which includes speakers or any type of sound system. An example of a handheld, mobile and/or portable PA system would be a megaphone.

**Question:** Can an organization conduct an agencywide online training that is streamed to multiple sites/locations, but have the training project reflect the site that the application is for?

**Answer:** An agencywide online training may be an allowable project, granted the following criteria are met:

- Training conducted using NSGP-NSS funds must address a specific threat and/or vulnerability, as identified in the nonprofit's Investment Justification (IJ). Training should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills.
- Proposed attendance at training courses and all associated costs leveraging the NSGP-NSS must be included in the nonprofit organization's Investment Justification. Any training attendance, to include curricula, requires prior approval by DHSES.



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## Technical

**Question:** I am having trouble downloading / opening the Investment Justification (IJ) template as a fillable-PDF. What procedures should be used to download the IJ?

**Answer:** Due to compatibility issues with FEMA's IJ template, the following options for accessing the document may be used:

- **Important:** Make sure you have **Adobe Acrobat** or **Adobe Acrobat Reader** installed on your computer. If accessing the IJ from the web, the IJ must be downloaded and saved as a PDF to your desktop or local hard drive before you start working on it.
  - If using **Google Chrome** or **Microsoft Edge** web browsers, after you click to open the document, a "Please wait..." message will appear.
  - Click the "Download" or "Save as" icon (upper right corner of the screen) and save the file to your desktop.
  - If using the **Firefox** web browser, the IJ will be viewable when you open it, however, you must download and save it as a PDF before you start working on it, otherwise errors may occur.
  - Navigate to your desktop where the file has been saved and open the document from here.
  - If the file does not open normally, right-click the file on your desktop and select "Open with", then select Adobe (acrobat, reader, etc.), then the file should open.
  - **Please keep the file saved on your desktop/local hard drive and do not save to any cloud-based storage, as future accessibility issues may occur. The IJ will also need to be uploaded/submitted with your application in this fillable-PDF format with all fillable fields and drop-downs enabled.**

**Question:** Can we receive feedback from a previously denied NSGP application?

**Answer:** Due to the competitive nature of the Nonprofit Security Grant Program National Security Supplemental (NSGP-NSS), DHSES cannot provide feedback regarding a previous application during an open application period, as this gives an unfair



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advantage over other applicants. It is recommended that unsuccessful applicants reach out to request application feedback upon receipt of your regret letter.

**Question:** What are the character limits for the narrative boxes within the Nonprofit Security Grant Program National Security Supplemental (NSGP-NSS) Investment Justification (IJ) template?

**Answer:** Character limits within the text fields of the IJ are identified per section below:

- Part I: 400-character limit each
- Part II: 500-character limit each
- Part III & Part IV: 2,200-character limit each
- Part VI: 1,000-character limit each
- Part VII: 2,200-character limit

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

**Answer:** No. Make sure to use the Nonprofit Security Grant Program National Security Supplemental (NSGP-NSS) 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 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 Nonprofit Security Grant Program (NSGP) must use the standard prequalification process, available here: <https://grantsmanagement.ny.gov/get-prequalified>.

**Question:** One of the documents that needs to accompany our grant application for is the Grants Information report from the New York Statewide Financial System (SFS) website showing prequalification status. 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 Grants Information report to demonstrate prequalification status. The E-



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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 **2024** as the funding year in E-Grants for the NSGP-NSS. **Selecting the wrong year will invalidate your application.**

**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 your organization has received.

**Question:** Will previously unfunded applicants be awarded bonus points?

**Answer:** No. There will be no bonus points issued for applicant organizations that have not received NSGP funding in the past for the NSGP-NSS. However, FEMA will add ten (10) points to applications from organizations in communities that are identified as “disadvantaged” by CEJST.

**Question:** If our organization previously received NSGP funding, but for a different site than we are applying for now, should we still indicate on the IJ that we received federal NSGP funding in the past?

**Answer:** Yes. Under “Funding History”, the Investment Justification (IJ) asks “Has the organization received federal NSGP funding in the past?” Please be sure to include any funding previously awarded to the organization as this question is not specific to individual sites.

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

**Answer:** To advance considerations of equity in awarding NSGP-NSS grant funding, FEMA will add additional points to the scores of organizations that are located within a disadvantaged community and demonstrate how they serve a disadvantaged community or population. FEMA will apply the Council on Environmental Quality’s Climate and Economic Justice Screening Tool (CEJST) to each applicant and will add ten (10) points to applications from organizations in communities identifies as “disadvantaged” by CEJST. For consortia applicants, only the lead nonprofit organization in a consortium is evaluated using CEJST.



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**Question:** What is the application due date for nonprofit organizations to apply to the NSGP-NSS?

**Answer:** Applications must be submitted via the DHSES E-Grants System by 5:00 PM on December 11, 2024. **No extensions will be granted.**