



NEW MEXICO DEPARTMENT OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT (NMDHSEM)

2024 Nonprofit Security Grant Program National Security Supplemental (NSGP-NSS) Funding Announcement and Allocation Methodology

1. Issued By

U.S. Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA)/Grant Programs Directorate (GPD)

New Mexico Department of Homeland Security and Emergency Management (DHSEM)

2. Assistance Listings Number

97.008

3. Assistance Listings Title

Nonprofit Security Grant Program

4. Funding Opportunity Title

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

5. Funding Opportunity Number

DHS-24-GPD-008-00-98

6. Authorizing Authority for Program

Section 2009 of the Homeland Security Act of 2002 (Pub. L. No. 107-296, as amended) (6 U.S.C. 609a)

7. Appropriation Authority for Program

National Security Supplemental (Israel Security Supplemental Appropriations Act, 2024, Pub. L. No. 118-50, Title II, Protection, Preparedness, Response and Recovery

8. NMDHSEM Contact

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A. PURPOSE, GOALS, OBJECTIVES, NATIONAL PRIORITIES

The Homeland Security Non-Profit Grant Program (NSGP) is a competitive grant program appropriated annually through the Department of Homeland Security (DHS) and administered by the Federal Emergency Management Agency (FEMA). It is intended to help nonprofit organizations increase their physical security posture against acts of terrorism or other extremist attacks. The National Security Supplemental (NSS) to the NSGP was authorized by Congress to bolster nonprofit security and protect those organizations facing an elevated level due to the Israel-Hamas war.

For FY 2024, DHS is focused on building a national culture of preparedness and protecting against terrorism and other threats to our national security. The threats to our Nation have evolved during the past two decades. We now face continuous cyber threats by sophisticated actors, threats to soft targets and crowded places, and threats from domestic violent extremists, who represent one of the most persistent threats to the nation today. Therefore, DHS/FEMA has identified one national priority area related to some of the most serious threats that subrecipients should address with their NSGP funds: **enhancing the protection of soft targets/crowded places.**

DHS/FEMA is also focused on forging partnerships to strengthen information sharing and collaboration among federal, state, local, tribal, and territorial law enforcement. There are no requirements for information sharing between nonprofit organizations and law enforcement; however, the NSGP-NSS seeks to bring nonprofit organizations into broader state and local preparedness efforts by removing barriers to communication and being more inclusive. DHS/FEMA encourages information sharing, while the goal of the NSGP-NSS is centered on improving and increasing a nonprofit organization's physical/cyber security and facility/target hardening to enhance the protection of soft targets/crowded places.

The objective of the NSGP-NSS is to provide funding for physical and cybersecurity enhancements and other security-related activities to nonprofit organizations that are at high risk of a terrorist or other extremist attack within the period of performance. The **NSGP-NSS seeks to address and close capability gaps identified in individual nonprofit organization Vulnerability Assessments.**

Given the evolving threat landscape, DHS/FEMA has evaluated the national risk profile and set priorities that help ensure appropriate allocation of scarce security dollars. In assessing the national risk profile, one area warrants the most concern under the NSGP-NSS:

- Enhancing the protection of soft targets/crowded places.

Likewise, there are several enduring security needs that crosscut the homeland security enterprise. The following are second-tier priority areas that help subrecipients implement a comprehensive approach to securing communities:

- Effective planning;
- Training and awareness campaigns; and
- Exercises.

A continuing area of concern is the threat posed by malicious cyber actors. Additional resources and information regarding cybersecurity and cybersecurity performance goals are available through the Cybersecurity and Infrastructure Security Agency, Cross-Sector Cybersecurity Performance Goals, and the National Institute of Standards and Technology.

NSGP-NSS Funding may be used for:

- Planning
- Equipment
- Training
- Exercises
- Maintenance and Sustainment
- Contracted Security Personnel

NSGP-NSS FUNDING: National Priorities

Priority Areas	Core Capabilities Enhanced	Example Project Types
Enhancing the Protection of Soft Targets/Crowded Places	<ul style="list-style-type: none"> • Planning • Operational coordination • Public information and warning • Intelligence and Information Sharing • Interdiction and disruption • Screening, search, and detection • Access control and identity verification • Physical protective measures • Risk management for protection programs and activities • Cybersecurity • Long-term vulnerability reduction • Situational assessment • Infrastructure systems 	<ul style="list-style-type: none"> • Private contracted security guards • Physical security enhancements <ul style="list-style-type: none"> ○ Closed circuit television (CCTV) security cameras ○ Security screening equipment for people and baggage ○ Access controls <ul style="list-style-type: none"> ▪ Fencing, gates, barriers, etc. ▪ Card readers, associated hardware/software • Cybersecurity enhancements <ul style="list-style-type: none"> ○ Risk-based cybersecurity planning and training ○ Improving cybersecurity of access control and identify verification systems ○ Improving cybersecurity of security technologies (e.g., CCTV systems) ○ Adoption of cybersecurity performance goals (https://www.cisa.gov/cpg)

NSGP-NSS FUNDING: Enduring Needs

Priority Areas	Core Capabilities Enhanced	Example Project Types
Planning	<ul style="list-style-type: none"> • Planning • Risk management for protection programs and activities • Risk and disaster resilience assessment • Threats and hazards identification • Operational coordination 	<ul style="list-style-type: none"> • Conduct or enhancement of security risk assessments • Development of: <ul style="list-style-type: none"> ○ Security plans and protocols ○ Emergency/contingency plans ○ Evacuation/shelter in place plans
Training & Awareness	<ul style="list-style-type: none"> • Long-term vulnerability reduction • Public information and warning 	<ul style="list-style-type: none"> • Active shooter training, including integrating the needs of persons with disabilities • Security training for employees • Public awareness/preparedness campaigns
Exercises	<ul style="list-style-type: none"> • Long-term vulnerability reduction 	<ul style="list-style-type: none"> • Response exercises

B. PERFORMANCE MEASURES

The performance metric for this program is:

- Percentage of funding awarded to the Soft Targets/Crowded Places national priority area by POETE (Planning, Organization, Equipment, Training, and Exercise) solution area, which includes:
 - Funding awarded for contract security;
 - Funding awarded for target hardening;
 - Funding awarded for cybersecurity measures; and
 - Funding awarded for training, awareness campaigns, and exercises.

C. ELIGIBILITY

The **State Administrative Agency (SAA)** is the **only eligible applicant to apply for funding through this grant program**. The New Mexico Department of Homeland Security and Emergency Management (NMDHSEM) is the SAA for this grant. Nonprofit organizations and consortia of nonprofit organizations **must apply for NSGP-NSS through NMDHSEM** who then

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submits the sub-applications information to FEMA. Nonprofit organizations and consortia of nonprofit organizations may **NOT** apply directly to DHS/FEMA for 2024 NSGP-NSS funds.

New for NSGP-NSS, nonprofit organizations can apply individually or as a group of sub-applicants through a consortium application. A consortium application is an opportunity for a nonprofit organization to act as a lead and apply for funding on behalf of itself and any number of other participating NSGP-NSS eligible nonprofit organizations. A consortium must fill out one IJ (done by the consortium lead) and the Consortium Workbook, in addition to the Vulnerability Assessment(s) and Mission Statements. All nonprofit organizations in the consortium application must be compliant with the NSGP-NSS eligibility requirements. 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 distribute grant-funded assets or provide grant-funded contractual services to non-compliant partner nonprofit organizations or other ineligible organizations. See [U.S. Department of Homeland Security \(DHS\) Notice of Funding Opportunity \(NOFO\) Nonprofit Security Grant Program National Security Supplemental \(NSGP-NSS\)](#) and the [Nonprofit Security Grant Program – National Security Supplemental Consortium Application Guide](#) for more information applying as part of a consortium.

Upon final approval from DHS/FEMA, funds are awarded to nonprofit organizations across the state utilizing a pass-through application process. Eligible sub-applicants must be registered in the federal System for Award Management (SAM) database and have a UEI (Unique Entity ID) number assigned to its agency (to get registered in the SAM database and request a UEI number, go to <https://sam.gov/>). Eligible sub-applicants must have an active/valid filing with the IRS to ensure 501(c)(3) status. Failure to comply with program eligibility requirements may cause funds to be withheld and/or suspension or termination of grant funds.

Sub-applicants are advised that FEMA may not make a federal award until the sub-applicant has complied with all applicable SAM requirements. Therefore, an applicant's SAM registration must be active not only at the time of application, but also during the application review period and when FEMA is ready to make a federal award. Further, as noted above, a sub-applicant's or subrecipient's SAM registration must remain active for the duration of an active federal award. If a sub-applicant's SAM registration is expired at the time of application, expires during application review, or expires any other time before award, FEMA may determine that the sub-applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

Nonprofit organizations eligible as sub-applicants 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. **This includes entities designated as "private" (e.g., private institutions of higher learning), as private colleges and universities can also be designated as 501c3 entities.**

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 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. For organizations that the IRS requires to apply for and receive a recognition of exemption under section 501(c)(3), the state may or may not require recognition of exemption, as long as the method chosen is applied consistently. Refer to links below for additional information:

- [Exemption Requirements - 501\(c\)\(3\) Organizations | Internal Revenue Service \(irs.gov\)](#)
- [Publication 557 \(01/2022\), Tax-Exempt Status for Your Organization | Internal Revenue Service \(irs.gov\)](#)
- [Charities and Nonprofits | Internal Revenue Service \(irs.gov\)](#)

2. Able to demonstrate, through the application, that the organization is at high risk of a terrorist or other extremist attacks and
3. For NSGP-NSS-S, located outside of a FY 2024 UASI-designated high risk urban area.

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Examples of eligible sub-applicant organizations can include houses of worship, museums, educational facilities, senior centers, community centers, day camps, medical facilities, and museums, among many others. Additionally, the final beneficiary of the NSGP-NSS grant award must be an eligible nonprofit organization and cannot be a for-profit/fundraising extension of a nonprofit organization or organizations. While these for-profit or fundraising extensions may be associated with the eligible nonprofit organization or organizations, NSGP-NSS funding cannot be used to benefit those extensions and therefore they will be considered ineligible applications.

If the funding being sought is for the benefit of a for-profit/fundraising extension, then that would constitute an ineligible subaward since only nonprofit organizations and consortia of nonprofit organizations are eligible subrecipients. This is distinct from a contract under an award in which a nonprofit organization could seek the assistance of a for-profit/fundraising extension, but the purpose would be to benefit the nonprofit organization and not for the benefit of the for-profit/fundraising extension. For information on the distinction between a subaward and contract, see [2 C.F.R. § 200.331](#).

D. FEDERAL AWARD INFORMATION

FY 2024 New Mexico Target Allocation NSGP-NSS:	\$1,852,500.00
5% for SAA Management & Administration:	\$97,500.00
Maximum Amount of Award for each entity:	\$200,000.00 per site (maximum 3 sites)
Projected Period of Performance Start Date:	May 1, 2025
Projected Period of Performance End Date:	April 30, 2028
Funding Instrument:	Sub-Grant Agreement from the SAA

E. FUNDING METHODOLOGY

The [Nonprofit Security Grant Program - National Security Supplemental Sub-applicant Quick Start Guide \(NSGP-NSS Quick Start Guide\)](#), [DHS NOFO NSGP-NSS](#), [NSGP-NSS Consortium Application Guide](#), and this funding announcement describes the steps taken by DHS/FEMA and NMDHSEM to allocate NSGP-NSS funding to stakeholders. These documents identify the priorities for funding so that subrecipients can be prepared to address the highest priority activities. They also serve as one way to increase transparency by sharing the decision-making approach with all stakeholders. Activities funded through NSGP-NSS have a Sub-grant Period of Performance that runs from May 1, 2025, to April 30, 2028.

Nonprofit organizations must apply through NMDHSEM and may only represent one site/location/physical address per application. For example, a nonprofit organization with one site may apply for up to \$200,000.00 for that site. Nonprofit organizations with multiple sites/locations/physical addresses may choose to apply for additional sites up to \$200,000.00 per site, for a maximum of three sites, not to exceed \$600,000.00 total per nonprofit organization.

If a nonprofit sub-applicant applies for projects at multiple sites, regardless of whether the projects are similar in nature, each individual site must include an assessment of the vulnerability and risk unique to each site. That is, one vulnerability assessment per location/physical address. Failure to do so may be cause for rejection of the application.

F. FUNDING RESTRICTIONS AND ALLOWABLE COSTS

All costs charged to awards covered under the 2024 NSGP-NSS must comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements at [2 C.F.R. Part 200](#), unless otherwise indicated in the NOFO, the terms and conditions of the award, or the [FEMA Preparedness Grant Manual - 2024](#). This includes, among other requirements, that costs must be incurred, and products and services must be delivered, within the period of performance of the award. See [2 C.F.R. § 200.403\(h\)](#), referring to budget periods, which for FEMA awards under this program is the same as the period of performance.

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Federal funds made available through this award may be used for the purpose set forth in this this funding announcement, [DHS NOFO NSGP-NSS](#) and the [FEMA Preparedness Grant Manual - 2024](#), and the terms and conditions of the award and must be consistent with the statutory authority for the award. Award funds may not be used for matching funds for any other federal awards, 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. See the [FEMA Preparedness Grant Manual - 2024](#) for more information on funding restrictions and allowable costs.

Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services

See the [FEMA Preparedness Grant Manual - 2024](#) for information on prohibitions on expending FEMA award funds for covered telecommunications equipment or services.

Management and Administration (M&A) Costs

M&A costs are allowed by the National Security Supplemental (Israel Security Supplemental Appropriations Act, 2024). M&A 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 but are necessary costs incurred in direct support of the federal award or as a consequence of it, such as travel, meeting-related expenses, and salaries of full/part-time staff in direct support of the program. As such, M&A costs can be itemized in financial reports. Other M&A costs 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.

Nonprofit organizations that receive an award under the NSGP-NSS may use and expend up to 5% of each subaward for M&A purposes associated with that award. If an organization is receiving more than one award, they must be able to separately account for M&A costs for each award. To calculate the 5% Management and Administration (M&A) allowance on a federal grant, start by identifying the total amount of federal funding provided. For example, if the grant award is \$200,000 in federal funds, multiply that amount by 0.05 (5%) to find the maximum allowed for M&A. In this case, $\$200,000 \times 0.05 = \$10,000$, meaning you can allocate up to \$10,000 for grant-related administrative tasks like paperwork, monitoring, or reporting

Planning

Planning costs are allowed under this program only as described in this funding notice and the [FEMA Preparedness Grant Manual - 2024](#).

Funding may be used for security or emergency planning expenses and the 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 consideration of access and functional needs as well as those with limited English proficiency. Planning efforts can also include conducting risk and resilience assessments on increasingly connected cyber and physical systems, on which security depends, the [Resilience Planning Program | CISA](#) and related CISA resources. Examples of planning activities allowable under this program include:

1. Development and enhancement of security plans and protocols;
2. Development or further strengthening of security assessments;
3. Emergency contingency plans;
4. Evacuation/Shelter-in-place plans;
5. Coordination and information sharing with fusion centers; and
6. Other project planning activities with prior approval from FEMA.

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Organization

Organization costs are **not allowed** under this program.

Equipment

Equipment costs are allowed under this program only as described in this funding announcement, the [DHS NOFO NSGP-NSS](#) and the [FEMA Preparedness Grant Manual - 2024](#).

Allowable costs are focused on facility 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 or other extremist attack. This equipment is **limited to select items** on the [Authorized Equipment List](#) (AEL). These items, including the item’s plain-language description **specific to the NSGP-NSS**, are as follows:

AEL Number	Title	Description
03OE- 03- MEGA	System, Public Address, Handheld or Mobile	Systems for mass audio notification, including vehicle-mounted high powered speaker systems, or battery powered megaphone/public address systems with corded microphone.
03OE-03- SIGN	Signs	Restricted access and caution warning signs that preprinted or field printable and can be various colors, sizes, and shapes. Examples can include traffic cones, other free-standing signage, mountable items, and signs and devices for individuals with disabilities and others with access and functional needs (e.g., programmable audible caution cones and scrolling marquis signs).
04AP-05- CRED	System, Credentialing	Software application and associated hardware and material for creating site/event credential badges and controlling scene access. Although some hardware may be required, functionality may also be obtainable via subscription as a cloud-based service, as opposed to purchasing software.
04AP- 06-VIDA	Software, Video Analytics	Software, either local or cloud-based, that analyzes video input to detect/determine temporal and spatial events, either in real time or using archival video. Analytical priorities might include recognition or patterns (movement or arrangement or persons, vehicles, or other objects). For the NSGP, license plate reader and facial recognition software are not allowed, but software to detect weapons through video analysis is allowed.
04AP-09- ALRT	Systems, Public Notification and Warning	Systems used to alert the public of protective actions or to provide warning to the public in the event of an incident, such as sirens, the Emergency Alert System (EAS), the Integrated Public Alert and Warning System (IPAWS), and Wireless Emergency Alerts (WEA).
04AP-11- SAAS	Applications, Software as a Service	Sometimes referred to as “on-demand software,” this application runs on the provider’s servers, delivering functionality via the internet to any device having connectivity and the required browser or interface. Access to the application is obtained via a service subscription rather than outright purchase, with all updates and configuration requirements handled by the service provider. This item is limited to those services that support security systems such as access controls, camera networks, cybersecurity services or other critical infrastructure security.
05AU-00- TOKN	System, Remote Authentication	Systems used to provide enhanced remote authentication, often consisting of a server or synchronization scheme and a device, token, or smartphone application.
05EN-00- ECRP	Software, Encryption	Encryption software used to protect stored data files or email messages.

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05HS-00- MALW	Software, Malware/Anti-Virus Protection	Software for protection against viruses, spyware, and malicious code. May be obtained for individual hosts or for entire network segments.
05HS-00- MALW	Software, Malware/Anti-Virus Protection	Software for protection against viruses, spyware, and malicious code. May be obtained for individual hosts or for entire network segments.
05HS-00- PFWL	System, Personal Firewall	Personal firewall for operation on individual workstations. This item is usually a software solution, but appliances are also available. See also: 05NP-00-FWAL.
05NP-00- FWAL	Firewall, Network	Firewall (software or standalone appliance) for use in protecting networks. See also 05HS-00-PFWL.
05NP-00- IDPS	System, Intrusion Detection/Prevention	Intrusion Detection and/or Prevention System deployed at either host or network level to detect and/or prevent unauthorized or aberrant (i.e., abnormal) behavior on the network.
06CP-01- PORT	Radio, Portable	Individual/portable radio transceivers, for notifications and alerts.
06CP-01- REPT	Repeater	Electronic device that receives a weak or low-level signal and retransmits that signal to extend usable range.
06CC-02- PAGE	Services/Systems, Paging	Paging services/systems/applications; one-way text messaging for notifications or alerts.
06CP-03- ICOM	Intercom/Intercom System	Communication system for a limited number of personnel in close proximity to receive alerts or notifications
06CP-03- PRAC	Accessories, Portable Radio	Speaker/microphone extensions to portable radios.
10GE-00- GENR	Generators	Generators (gasoline, diesel, propane, natural gas, etc.) and their required installation materials, including 10PE-00-PTSW (a power switch) if not already included, to support a redundant power supply for security systems, alarms, lighting, and other physical security/cybersecurity infrastructure or systems.
13IT-00- ALRT	System, Alert/Notification	Alert/notification software that allows for real-time dissemination of information for situational awareness or alerts among a group via means such as smartphones, landlines, pagers, etc. This item may also be a subscription cloud-based service using a web browser interface or a mobile application instead of a software.
10PE-00- UPS	Supply, Uninterruptible Power (UPS)	Systems that compensate for power loss to serviced equipment (e.g., short-duration battery devices, standby generator devices for longer duration).
14CI-00- COOP	System, Information Technology Contingency Operations	Back-up computer hardware, operating systems, data storage, and application software necessary to provide a working environment for contingency operations. May be purchased as a remote service or a dedicated alternate operating site.
14EX-00- BCAN	Receptacles, Trash, Blast-Resistant	Blast-resistant trash receptacles.
14EX-00- BSIR	Systems, Building, Blast/Shock/Impact Resistant	Systems to mitigate damage from blasts, shocks, or impacts, such as column and surface wraps, wall coverings, portable or fix ballistic boards/barriers, breakage/shatter resistant glass, window wraps/films/velums, etc.
14SW-01- ALRM	Systems/Sensors, Alarm	Systems and standalone sensors designed to detect access violations or intrusions using sensors such as door/window switches, motion sensors, acoustic sensors, seismic sensors, and thermal sensors. May also include temperature sensors for critical areas.
14SW-01- ASTN	Network, Acoustic Sensor Triangulation	Network of deployed acoustic sensors and one or more processing nodes for data integration and analysis. Such networks can be set to one or more ranges of frequencies to detect sounds such as gunshots, heavy weapons discharge, explosions, man-portable air defense system launches, vehicle noises, etc., and utilize acoustic

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		triangulation to provide accurate location data. Such networks can be wired, wireless, or hybrid, and are capable of operation near critical infrastructure assets or in wide areas.
14SW-01- DOOR	Doors and Gates, Impact Resistant	Reinforced doors and gates with increased resistance to external impact for increased physical security.
14SW- 01- LITE	Lighting, Area, Fixed	Fixed high-intensity lighting systems for improved visibility in areas such as building perimeters, parking lots, and other critical zones to increase physical security.
14SW-01- PACS	System, Physical Access Control	Locking devices and entry systems for control of physical access to facilities.
14SW-01- SIDP	Systems, Personnel Identification	Systems for positive identification of personnel as a prerequisite for entering restricted areas or accessing information systems.
14SW-01- SIDV	Systems, Vehicle Identification	Systems for identification of vehicles, ranging from decals to radio frequency identification or other transponder devices. (License plate reader and facial recognition software are NOT allowed.)
14SW-01- SNSR	Sensors/Alarms, System and Infrastructure Monitoring, Standalone	Standalone sensors/alarms for use on critical systems or infrastructure items (e.g., security systems, power supplies, etc.) to provide warning when these systems fail or are near failure.
14SW-01- VIDA	Systems, Video Assessment, Security	Camera-based security systems utilizing standard, low light, or infrared technology. (License plate reader and facial recognition software are NOT allowed.)
14SW-01- WALL	Barriers: Fences; Jersey Walls	Obstacles designed to channel or halt pedestrian or vehicle-borne traffic to protect a physical asset or facility such as barriers, bollards, planters, benches etc. (Earthen barriers, berms, trees, or other botanical obstacles are NOT allowed.)
15SC-00- PPSS	Systems, Personnel/Package Screening	Hand-held or fixed systems such as walk-through magnetometers used to screen personnel and packages for hazardous materials/devices.
21GN-00- INST	Installation	Installation costs for authorized equipment purchased through FEMA grants.
21GN-00- TRNG	Training and Awareness	See Section "Training and Exercises"

The AELs listed above are available as choices in the dropdown menus Section IV-B of the 2024 NSGP-NSS IJ. While not part of the AEL, the following are also available in the dropdown menus:

Code	Title
Contract Security	Private Contact Security Personnel/Guards
M&A	Management and Administration (M&A)
Planning	Planning
Exercise	Exercise

Unless otherwise stated, equipment must meet all mandatory statutory, regulatory, and FEMA-adopted standards to be eligible for purchase using these funds, including the Americans with Disabilities Act. In addition, subrecipients will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment, whether with NSGP-NSS funding or other sources of funds. See the Maintenance and Sustainment section in this document.

Subrecipients may purchase equipment not listed on the AEL, but only if they first seek and obtain prior approval from FEMA through NMDHSEM. **Note:** Nonprofits should indicate in their budget narratives if a cost includes shipping and/or tax. It is not required to break the costs out as separate from the relevant purchase(s).

Subrecipients should analyze the cost benefits of purchasing versus leasing equipment, especially high-cost items, and those subject to rapid technical advances. Large equipment purchases must be identified and explained. For more information regarding property management standards for equipment, please reference [2 C.F.R. Part 200](#), including but

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not limited to [2 C.F.R. 200.310](#), [2 C.F.R. 200.313](#), and [2 C.F.R. 200.316](#). Also see [2 C.F.R. 200.216](#), [2 C.F.R. 200.471](#), and [FEMA Policy #405-143-1 – Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services](#), regarding prohibitions on covered telecommunications equipment or services. Additionally, subrecipients that are using NSGP-NSS funds to support emergency communications equipment activities must comply with the [SAFECOM Guidance on Emergency Communications Grants](#), including provisions on technical standards that ensure and enhance interoperable communications.

The Installation of certain equipment may trigger Environmental Planning and Historic Preservation (EHP) requirements. Please reference the EHP sections in this document, [DHS NOFO NSGP-NSS](#) and the [FEMA Preparedness Grant Manual - 2024](#) for more information. Additionally, some equipment installation may constitute construction or renovation. Please see Construction and Renovation in this document for additional information.

Training

Training and exercise costs are allowed under this program only as described in this funding announcement, [DHS NOFO NSGP-NSS](#) and the [FEMA Preparedness Grant Manual - 2024](#).

Nonprofit organizations may use NSGP-NSS funds for the following training-related costs:

1. Employed or volunteer security staff to attend security-related training within the United States;
2. Employed or volunteer staff to attend security-related training within the United States with the intent of training other employees or members/congregants upon completing the training (i.e., “train-the-trainer” type courses); and
3. Nonprofit organization’s employees, or members/congregants to receive on- site security training.

Allowable training-related costs under the NSGP-NSS are limited to attendance fees for training and related expenses, such as materials, supplies, and/or equipment. Overtime, backfill, and travel expenses are **NOT** allowable costs.

Allowable training topics are limited to the protection of critical infrastructure key resources, including physical and cybersecurity, facility hardening, and terrorism/other extremism awareness/employee preparedness such as Community Emergency Response Team (CERT) training, indicators and behaviors indicative of terrorist/other extremist threats, Active Shooter training, and emergency first aid training. Additional examples of allowable training courses include: “Stop the Bleed” training, kits/equipment, and training aids; First Aid and other novice level “you are the help until help arrives” training, kits/equipment, and training aids; and Automatic External Defibrillator (AED) and AED/Basic Life Support training, kits/equipment, and training aids.

Here
Training conducted using NSGP-NSS funds must address a specific threat and/or vulnerability, as identified in the nonprofit organization’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 using the NSGP-NSS **must be included in the nonprofit organization’s IJ**.

Exercises

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. Exercises afford organizations the opportunity to validate plans and procedures, evaluate capabilities, and assess progress toward meeting capability targets in a controlled, low risk setting. All shortcomings or gaps—including those identified for children and individuals with access and functional needs—should be identified in an improvement plan. Improvement plans should be dynamic documents with corrective actions continually monitored and implemented as part of improving preparedness through the exercise cycle.

The Homeland Security Exercise and Evaluation Program (HSEEP) provides a set of guiding principles for exercise programs, as well as a common approach to exercise program management, design and development, conduct, evaluation, and

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improvement planning. For additional information on HSEEP, refer to [Homeland Security Exercise and Evaluation Program | FEMA.gov](#). In accordance with HSEEP guidance, subrecipients are reminded of the importance of implementing corrective actions throughout the progressive exercise cycle. This link provides access to a sample After Action Report (AAR)/Improvement Plan (IP) template: [Improvement Planning – HSEEP Resources – Preparedness Toolkit \(fema.gov\)](#). Subrecipients are encouraged to enter their exercise data and AAR/IP in the [Preparedness Toolkit](#).

Maintenance and Sustainment

Maintenance and sustainment costs, such as maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable. For additional information, see [FEMA Preparedness Grant Manual - 2024](#).

Construction and Renovation

NSGP-NSS funding **may not** be used for construction and renovation projects without **prior written approval** from FEMA through NMDHSEM. In some cases, the installation of equipment may constitute construction and/or renovation. Additionally, subrecipients are required to submit a SF-424C budget and budget detail citing the project costs and a SF-424D Form for standard assurances for the construction project. The total cost of any construction or renovation paid for using NSGP-NSS funds may not exceed the greater amount of \$1 million or 15% of the NSGP-NSS award. If you have any questions regarding whether an equipment installation project could be considered construction or renovation, please contact the NMDHSEM Grants Management Bureau at dhsem-grantsmanagement@state.nm.us.

Contracted Security Personnel

Contracted security personnel are allowed under this program only as described in this NOFO and must comply with guidance set forth in [IB 441 Allowability to Reprogram Nonprofit Security Grant Program Funding to Contracted Security Personnel](#). NSGP-NSS funds may not be used to purchase equipment for contracted security.

G. 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 programs/initiatives to build prevention and protection-focused capabilities directed at identified facilities and/or the surrounding communities;
- 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;
- Cameras for license plate readers/license plate reader software;
- Cameras for facial recognition software;
- Weapons or weapons-related training; and
- Knox boxes.

H. BUILD AMERICA, BUY AMERICA ACT (BABAA)

Build America, Buy America Act (BABAA), which was enacted as part of the Infrastructure Investment and Jobs Act §§ 70901-70927, Pub. L. No. 117-58 (2021); and Executive Order 14005, Ensuring the Future is Made in All of America by All of America's Workers. See also 2 C.F.R. Part 184 and Office of Management and Budget (OMB) Memorandum M-24-02,

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Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure.

None of the funds provided under this program may be used for a project for infrastructure unless the iron and steel, manufactured products, and construction materials used in that infrastructure are produced in the United States. The Buy America preference only applies to articles, materials, and supplies that are consumed in, incorporated into, or affixed to an infrastructure project. As such, it does not apply to tools, equipment, and supplies, such as temporary scaffolding, brought to the construction site and removed at or before the completion of the infrastructure project. Nor does a Buy America preference apply to equipment and furnishings, such as movable chairs, desks, and portable computer equipment, that are used at or within the finished infrastructure project but are not an integral part of the structure or permanently affixed to the infrastructure project.

For FEMA's official policy on BABAA, please see [FEMA Policy 207-22-0001: Buy America Preference in FEMA Financial Assistance Programs](#) for Infrastructure. To see whether a FEMA federal financial assistance program is considered an infrastructure program and required to include a Buy America preference, visit <https://www.fema.gov/grants/policy-guidance/buy-america/programs-definitions>.

Waivers

When necessary, subrecipients through NMDHSEM may apply for, and FEMA may grant, a waiver from these requirements. A waiver of the domestic content procurement preference may be granted by the agency awarding official if FEMA determines that:

- Applying the domestic content procurement preference would be inconsistent with the public interest.
- The types of iron, steel, manufactured products, or construction materials are not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality.
- The inclusion of iron, steel, manufactured products, or construction materials produced in the United States will increase the cost of the overall project by more than 25%.

For FEMA awards, the process for requesting a waiver from the Buy America preference requirements can be found on FEMA's website at: <https://www.fema.gov/grants/policy-guidance/buy-america>.

I. REPORT ISSUES OF FRAUD, WASTE, ABUSE

Please note, when applying to this notice of funding opportunity and when administering the grant, applicants may report issues of fraud, waste, abuse, and mismanagement, or other criminal or noncriminal misconduct to the Office of Inspector General (OIG) Hotline. The toll-free numbers to call are 1 (800) 323- 8603, and TTY 1 (844) 889-4357.

J. PROTECTING HOUSES OF WORSHIP AND PUBLIC VENUES

Across the United States, Americans congregate in faith-based venues to worship, learn, play, and bond as a community. However, public gatherings are vulnerable, and adversaries may perceive houses of worship as attractive targets where they can inflict mass casualties, cause substantial psychological impacts, and draw extensive media coverage. The DHS Center for Faith-Based & Neighborhood Partnerships (DHS Center) partners with interagency and whole community partners to offer numerous resources to assist faith-based and community organizations with their efforts to prepare for all types of hazards, whether natural or man-made. Technical assistance is provided through presentations, workshops, training, webinars, tabletop exercises, and training. Access to these free resources can be found at [DHS Center for Faith-Based and Neighborhood Partnerships Resources | FEMA.gov](#).

K. IMPORTANT CHANGES TO PROCUREMENT STANDARDS IN 2 C.F.R. PART 200

On April 22, 2024, OMB updated various parts of Title 2 of the Code of Federal Regulations, among them the procurement standards. These revisions apply to all FEMA awards with a federal award date or disaster declaration date on or after October 1, 2024, unless specified otherwise. The changes include updates to the federal procurement standards, which govern how FEMA award recipients and subrecipients must purchase under a FEMA award.

More information on OMB's revisions to the federal procurement standards can be found in [Purchasing Under a FEMA Award: 2024 OMB Revisions Fact Sheet](#).

L. APPLICATION REVIEW INFORMATION

Nonprofit organizations must submit their 2024 NSGP-NSS applications to DHSEM no later than January 3, 2024 at 5:00 p.m. MST. **Applications received after that date and time will not be considered for funding.** 2024 NSGP-NSS applications will be reviewed through a two-phase state and federal review process for completeness, adherence to programmatic guidelines, feasibility, and how well the IJ (project description and justification) addresses the identified risk(s).

The following are the 2024 NSGP-NSS evaluation process and criteria:

- For NSGP-NSS, verification that the nonprofit organization or all nonprofit organizations within a consortium are located outside of one of the FY 2024 UASI-designated high risk urban areas.
- Identification and substantiation of current or persistent threats or attacks (from within or outside the United States) by a terrorist or other extremist organization, network, or cell against the sub-applicant based on their ideology, beliefs, and/or mission as:
 1. An ideology-based/spiritual/religious (houses of worship, educational institutions, medical facilities, etc.);
 2. Educational (secular);
 3. Medical (secular); or
 4. Other nonprofit entity;
- Heightened threat resulting from the Israel-Hamas war;
- Symbolic value of the site(s) as a highly recognized regional and/or national or historical institution(s) that renders the site a possible target of terrorist or other extremist attack;
- Role of the nonprofit organization in responding to or recovering from terrorist or other extremist attacks;
- Alignment between the project activities requested within the physical or cyber vulnerabilities identified in the organization's vulnerability assessment;
- Integration of nonprofit preparedness with broader state and local preparedness efforts;
- Completed IJ **for each site or the collective consortium** that addresses an identified risk **unique to that site or consortium**, including the assessed threat, vulnerability, and consequence of the risk; and
- Demonstration that the nonprofit organization (the individual nonprofit organization or the lead nonprofit organization for a consortium application) is located within a disadvantaged community;
- **For consortium applications only:** IJ clearly identifies shared threat, vulnerability and consequences of risk(s) facing all nonprofit organizations within the consortium and demonstrates how the proposed investments respond to or support the recovery from the identified shared risks.

Grant projects must be:

1. Both feasible and effective at mitigating the identified vulnerability and thus reducing the risks for which the project was designed; and
2. Able to be fully completed within the three-year period of performance. DHS/FEMA will use the information provided in the application, as well as any supporting documentation, to determine the feasibility and effectiveness of the grant project. Information that would assist in the feasibility and effectiveness determination includes the following:
 - Scope of work (purpose and objectives of the project, identification of what is being protected);
 - Desired outcomes, including expected long-term impact where applicable;

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- Summary of status of planning and design accomplished to date (e.g., included in a capital improvement plan); and
- Project schedule.

Subrecipients are expected to conform, as applicable, with accepted engineering practices, established codes, standards, modeling techniques, and best practices.

M. REVIEW AND RECOMMENDATION TO DHS/FEMA

1. The NMDHSEM's Grants Management Bureau uses the attached Nonprofit Security Grant Program Scoring Matrix – Fiscal Year 2024 to review and score all IJs for eligibility, completeness and to validate compliance with both the Federal NOFO and State Funding Announcement.
2. The NMDHSEM Grants Support Unit will contact each applicant that needs to submit additional 'proof' or 'back-up.' To meet the requirement for a grant award, there is a 72-hour turn-around required for the submittal of these materials.
3. IJs that meet the criteria established in the attached Nonprofit Security Grant Program Scoring Matrix – Fiscal Year 2024, [Department of Homeland Security \(DHS\) Notice of Funding Opportunity \(NOFO\) Fiscal Year 2024 Nonprofit Security Grant Program](#) and the [FEMA Preparedness Grant Manual - 2024](#) will be submitted by NMDHSEM to DHS/FEMA for final approval and allocation of funds.
4. Award letters are sent to applicants that are allocated funding. Letters will also be sent to applicants that do not receive funding and will include a description of why activities were not selected for funding. It is anticipated that these letters will be sent within 45 – 60 days of NMDHSEM's receipt of the NSGP award.
5. For those communities that are allocated funding, a Sub-grant Agreement will be sent. As the Sub-grant Agreement can be sent only after FEMA awards funding to the State, the distribution date will be within 45 – 60 days of NMDHSEM's receipt of the NSGP award.

N. FINANCIAL INTEGRITY CRITERIA

Prior to making a state and federal award, FEMA is required by 31 U.S.C. § 3354, as enacted by the Payment Integrity Information Act of 2019, Pub. L. No. 116-117 (2020); 41 U.S.C. § 2313; and 2 C.F.R. § 200.206 to review information available through any Office of Management and Budget (OMB)-designated repositories of governmentwide eligibility qualification or financial integrity information, including whether SAM.gov identifies the applicant as being excluded from receiving federal awards or is flagged for any integrity record submission. FEMA may also pose additional questions to the applicant to aid in conducting the pre-award risk review. Therefore, application evaluation criteria may include the following risk- based considerations of the applicant:

1. Financial stability.
2. Quality of management systems and ability to meet management standards.
3. History of performance in managing federal award.
4. Reports and findings from audits.
5. Ability to effectively implement statutory, regulatory, or other requirements.

O. SUPPLEMENTAL FINANCIAL INTEGRITY CRITERIA AND REVIEW

Prior to making a federal award where the anticipated total federal share will be greater than the simplified acquisition threshold, currently \$250,000:

1. FEMA is required by 41 U.S.C. § 2313 and 2 C.F.R. § 200.206(a)(2) to review and consider any information about the applicant, including information on the applicant's immediate and highest-level owner, subsidiaries, and predecessors, if applicable, that is in the designated integrity and performance system accessible through the System for Award Management (SAM), which is currently the Federal Awardee Performance and Integrity Information System (FAPIIS).
2. An applicant, at its option, may review information in FAPIIS and comment on any information about itself that a federal awarding agency previously entered.
3. FEMA will consider any comments by the applicant, in addition to the other information in FAPIIS, in making a

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judgment about the applicant's integrity, business ethics, and record of performance under federal awards when completing the review of risk posed by applicants as described in 2 C.F.R. § 200.206.

P. SECURITY REVIEW

DHS Intelligence and Analysis receives a list of potential NSGP subrecipient organizations, which it reviews against U.S. intelligence community reporting. The security review occurs after the competitive scoring and selection process is complete. The information provided for the security review is limited to the nonprofit organization's name and physical address, as submitted by the nonprofit organization. Any potentially derogatory information, as well as any potentially mitigating information, that could assist in determining whether a security risk exists is sent to FEMA and is used in making final award decisions.

Q. NSGP -NSS APPLICATION REVIEW AND SELECTION PROCESS

NMDHSEM Review

Application packages are to be submitted by the sub-applicant to NMDHSEM based on the established criteria. NMDHSEM will review applications and recommend to DHS/FEMA which sub-applicants should be selected for funding. As part of the state review, NMDHSEM must:

1. Conduct an eligibility review;
2. Verify that the nonprofit organization or all nonprofit organizations within the consortium are located outside a FY 2024 UASI-designated high-risk urban area;
3. Review and score only **complete** application packages (including mission statements and vulnerability assessments and for consortium applications, Consortium Workbooks) using the NSGP-NSS Scoring Criteria provided by DHS/FEMA;
4. Validate the **self-certified organization type listed in the IJ** and in the Consortium Workbook by assessing the central purpose of the nonprofit organization(s) described in the mission statement(s);
5. Prioritize all NSGP-NSS IJs by ranking each IJ. Each IJ will receive a unique rank (#1 [one] being the highest ranked through the total number of applications the SAA scored);
6. Consortium applications and individual nonprofit organization applications must be **ranked separately**;
7. Submit the results of the DHSEM review of **complete applications from eligible sub-applicants** to DHS/FEMA using the SAA Prioritization Tracker;
8. Submit sub-applicant application details for applications received but not recommended for funding (including incomplete applications and ineligible sub-applicants), as well as justification as to why they are not being recommended for funding to DHS/FEMA using the SAA Prioritization Tracker;
9. Submit all IJs, even those that are not recommended for funding;
10. Record all IJs received and total budget requests in the SAA prioritization tracker, including those not recommended for funding, such as incomplete IJs and IJs from sub-applicants deemed ineligible; and
11. Retain the mission statements and vulnerability assessments submitted by each sub-applicant.

NMDHSEM will base the ranking on the final scores from the Prioritization Tracker as determined by NMDHSEM's subject-matter expertise and discretion with consideration of the following factors:

- **Need:** The relative need for the sub-applicant compared to the other sub-applicants; and
- **Impact:** The feasibility of the proposed project and how effectively the proposed project addresses the identified need.

NMDHSEM reviewers will score each question in the IJ according to the scoring matrix in the federal [DHS NOFO NSGP-NSS](#), Appendix A.

Federal Review

The IJs submitted by each SAA will be reviewed by DHS/FEMA federal staff. Federal staff will also verify that the sub-applicant is located outside of a FY 2024 UASI-designated high-risk urban area. Federal reviewers will review each IJ to

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check for the following:

- Eligibility (e.g., that a potential subrecipient meets all the criteria for the program);
- Allowability of the proposed project(s); and
- Any derogatory information on the sub-applicant applying per Section E.1.d “Security Review” of the [DHS NOFO NSGP-NSS](#).

Final Score

To calculate an application’s final score, the sub-applicant's SAA score will be multiplied:

- By a factor of four for nonprofit organizations facing heightened threat resulting from the Israel-Hamas war (*sub-applicants **must draw a clear connection between the heightened threat they face and the Israel-Hamas war in their project narratives to qualify for this multiplier.***)

Any nonprofit organization that can demonstrate it faces heightened threat resulting from the Israel-Hamas war is eligible for this multiplier, regardless of the organization’s purpose, mission, viewpoint, membership, or affiliations. Below are a few illustrative examples of scenarios that may qualify a nonprofit organization for this multiplier:

- A Nonprofit organization that can demonstrate a clear threat of violence based on its actual or perceived views, positions, or advocacy related to aspects of the Israel-Hamas war.
- A private, secular university that faces threats from violent extremists that are associated with increased protest activity relating to the Israel-Hamas war, resulting in the need for additional public safety assets.
- An Arab organization that has been targeted, due to its ethnic affiliation, by violent extremists through online hate referencing the Israel-Hamas war.
- A Jewish day school that was vandalized by violent extremists seeking to commit attacks based on the Israel-Hamas war.
- An LGBTQ+ organization that faced violent protests during Pride events related to aspects of the Israel-Hamas war.
- A mosque that has received threats of violence based on the worldwide unrest because of the ongoing Israel-Hamas war.
- A Sikh organization where a violent extremist attempted to access a holiday celebration due to the organization’s perceived position on the Israel-Hamas war.

These cases are merely illustrative, not exhaustive, of the types of nonprofits and conditions under which this multiplier would apply. For sub-applicants who claim this multiplier, they must draw a clear connection between the heightened threat they face due to the ongoing conflict in the Middle East, though descriptive examples of real-world situations to include, but not limited to, supporting documents such as insurance claims, threat reporting, police reports, and online threats. **Note: This multiplier is specific to the NSGP-NSS funding opportunity only.**

- By a factor of three for ideology-based/spiritual/religious entities (e.g., houses of worship, ideology-based/spiritual/religious educational institutions, ideology-based/ spiritual/religious medical facilities);
- By a factor of two for secular educational and medical institutions; and
- By a factor of one for all other nonprofit organizations.

To advance considerations of equity in awarding NSGP-NSS grant funding, FEMA will add 10 additional points to the scores of sub-applicants that are located within a disadvantaged community. FEMA will apply the Council on Environmental Quality’s [Climate and Economic Justice Screening Tool \(CEJST\)](#) to each sub-applicant using the address of their physical location. FEMA will add 10 points-to applications from organizations in communities identified as “disadvantaged” by CEJST. Only the lead nonprofit organization in a consortium is evaluated using CEJST.

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Sub-applicants will be selected from highest to lowest scored within their respective state/territory until the available state target allocation has been exhausted. In the event of a tie during the funding determination process, priority will be given to sub-applicants located in disadvantaged communities, then those that have not received prior year funding, and then those prioritized highest by their SAA. Should additional NSGP-NSS funding remain unobligated after reviewing all state/territory submissions, FEMA will use the final scores, in part, to determine how the remaining balance of funds will be allocated. Submissions will be selected for funding until the remaining balance of funds is exhausted.

DHS/FEMA will use the final results to make funding recommendations to the Secretary of Homeland Security. All final funding determinations will be made by the Secretary of Homeland Security, who retains the discretion to consider other factors and information in addition to DHS/FEMA's funding recommendations

Required Notice of Non-Selection

NMDHSEM is required to inform sub-applicants of their non-selection no later than 90 days from the date NMDHSEM accepts their NSGP award.

R. ADMINISTRATIVE AND NATIONAL POLICY REQUIREMENTS

In addition to the requirements of in this section and in this NOFO, FEMA may place specific terms and conditions on individual awards in accordance with [2 C.F.R. Part 200](#)

DHS Standard Terms and Conditions

All successful sub-applicants for DHS/FEMA grants are required to comply with [DHS Standard Terms and Conditions](#). The applicable DHS Standard Terms and Conditions will be those in effect at the time the subaward was made. The terms and conditions that will apply for the subaward will be clearly stated in the subgrant agreement.

In addition to the information regarding DHS Standard Terms and Conditions and Ensuring the Protection of Civil Rights, see the [FEMA Preparedness Grant Manual - 2024](#) for additional information on administrative and national policy requirements, including the following:

- Environmental Planning and Historic Preservation (EHP) Compliance
- FirstNet
- National Incident Management System (NIMS) Implementation
- SAFECOM

Ensuring the Protection of Civil Rights

As the Nation works towards achieving the National Preparedness Goal, it is important to continue to protect the civil rights of individuals. Recipients and subrecipients must carry out their programs and activities, including those related to the building, sustainment, and delivery of core capabilities, in a manner that respects and ensures the protection of civil rights for protected populations.

Federal civil rights statutes, such as Section 504 of the Rehabilitation Act of 1973 and Title VI of the Civil Rights Act of 1964, along with DHS and FEMA regulations, prohibit discrimination on the basis of race, color, national origin, sex, religion, age, disability, limited English proficiency, or economic status in connection with programs and activities receiving federal financial assistance from FEMA, as applicable.

The DHS Standard Terms and Conditions include a fuller list of the civil rights provisions that apply to recipients and subrecipients. These terms and conditions can be found in the [DHS Standard Terms and Conditions](#). Additional information on civil rights provisions is available at FEMA [External Civil Rights Division](#).

Monitoring and oversight requirements in connection with subrecipient compliance with federal civil rights laws are also

authorized pursuant to 44 C.F.R. Part 7 or other applicable regulations.

In accordance with civil rights laws and regulations, recipients and subrecipients must ensure 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.

Environmental Planning and Historic Preservation (EHP) Compliance

See the [FEMA Preparedness Grant Manual - 2024](#) for information on EHP compliance.

National Incident Management System (NIMS) Implementation

Subrecipients are highly encouraged to adopt and implement NIMS. Subrecipients are encouraged to reach out to their local Emergency Manager for assistance with establishing a NIMS implementation plan. See the [FEMA Preparedness Grant Manual - 2024](#) for information about NIMS implementation.

Mandatory Disclosures

The non-Federal sub-applicant for a Federal award must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. See ([2 C.F.R. 200.113](#)). Please note applicants and subrecipients may report issues of fraud, waste, abuse, and mismanagement, or other criminal or noncriminal misconduct to the [Office of Inspector General \(OIG\) Hotline](#). The toll-free numbers to call are 1 (800) 323- 8603, and TTY 1 (844) 889-4357.

Reporting

Subrecipients are required to submit various financial and programmatic reports as a condition of subaward acceptance. Future awards and funds drawdown may be withheld if these reports are delinquent.

Monitoring and Oversight

The regulation at [2 C.F.R. 200.337](#) provides DHS and any of its authorized representatives with the right of access to any documents, papers, or other records of the recipient [and any subrecipients] that are pertinent to a federal award in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the recipient's or subrecipient's personnel for the purpose of interview and discussion related to such documents. Pursuant to this right and per [2 C.F.R. § 200.329](#), DHS may conduct desk reviews and make site visits to review project accomplishments and management control systems to evaluate project accomplishments and to provide any required technical assistance. During site visits, DHS may review a recipient's or subrecipient's files pertinent to the federal award and interview and/or discuss these files with the recipient's or subrecipient's personnel. Recipients and subrecipients must respond in a timely and accurate manner to DHS requests for information relating to a federal award. See the [DHS NOFO NSGP-NSS](#) and [FEMA Preparedness Grant Manual - 2024](#) for mor information.

Equal Rights

The FEMA Office of Equal Rights (OER) is responsible for compliance with and enforcement of federal civil rights obligations in connection with programs and services conducted by FEMA and subrecipients of FEMA financial assistance. All inquiries and communications about federal civil rights compliance for FEMA grants under the [DHS NOFO NSGP-NSS](#) should be sent to FEMA-CivilRightsOffice@fema.dhs.gov.

S. ADDITIONAL INFORMATION

The Grants Program Directorate (GPD) has developed the Preparedness Grants Manual to guide sub-applicants and subrecipients of grant funding on how to manage their grants and other resources. Subrecipients seeking guidance on policies and procedures for managing preparedness grants should reference the [FEMA Preparedness Grant Manual - 2024](#) for further information. Examples of information contained in the manual include:

- Actions to Address Noncompliance

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- Audits
- Case Studies and Use of Grant-Funded Resources During Real-World Incident Operations
- Community Lifelines
- Conflicts of Interest in the Administration of Federal Awards and Subawards
- Disability Integration
- National Incident Management System
- Payment Information
- Period of Performance Extensions
- Procurement Integrity
- Record Retention
- Termination Provisions
- Whole Community Preparedness
- Report issues of Fraud, Waste, and Abuse
- Hazard Resistant Building Codes
- Other Post-Award Requirements

T. TERMINATION PROVISIONS

Pass-through entities should refer to [2 C.F.R. 200.340](#) for additional information on termination regarding subawards. Note that all information in Section H.1 of the [DHS NOFO NSGP-NSS](#) “Termination Provisions” is repeated in the [FEMA Preparedness Grant Manual - 2024](#).

Noncompliance

If a subrecipient fails to comply with the terms and conditions of a state/federal award, NMDHSEM or DHS/FEMA may terminate the award in whole or in part. If the noncompliance can be corrected, NMDHSEM or DHS/FEMA may first attempt to direct the subrecipient to correct the noncompliance. This may take the form of a Compliance Notification. If the noncompliance cannot be corrected or the subrecipient is non-responsive, NMDHSEM or DHS/FEMA may proceed with a Remedy Notification, which could impose a remedy for noncompliance per [2 C.F.R. 200.339](#), including termination. Any action to terminate based on noncompliance will follow the requirements of [2 C.F.R. 200.341](#) and [2 C.F.R. 200.342](#) as well as the requirement of [2 C.F.R. 200.340\(c\)](#) to report in FAPIIS the recipient’s material failure to comply with the award terms and conditions. See also the section on Actions to Address Noncompliance in the [FEMA Preparedness Grant Manual - 2024](#).

U. APPLICATION EVALUATION CRITERIA AND PROCESS

A sub-application submitted by an otherwise eligible nonprofit may be deemed ineligible when the person that submitted the sub-application is not:

1. A current employee, personnel, official, staff, or leadership of the nonprofit organization; and
2. Duly authorized to apply for an award on behalf of the nonprofit organization at the time of application.

Further, the Authorized Organization Representative (AOR) must be a duly authorized current employee, personnel, official, staff or leadership of the subrecipient and provide an email address unique to the subrecipient at the time of application and upon any change in assignment during the period of performance. Consultants or contractors of the subrecipient **are not permitted to be the AOR of the subrecipient.**

Grant projects must be:

1. Both feasible and effective at mitigating the identified vulnerability and thus reducing the risks for which the project was designed; and
2. Able to be fully completed within the period of performance.

The information provided in the application, as well as any supporting documentation, will be used to determine the

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feasibility and effectiveness of the grant project. Information that would assist in the feasibility and effectiveness determination includes the following:

- Scope of work (purpose, desired outcomes, and objectives of the project, identification of what is being protected);
- Including expected long-term impact where applicable;
- Summary of status of planning and design accomplished to date (e.g., included in a capital improvement plan); and
- Project schedule.

Recipients and subrecipients are expected to conform, as applicable, with accepted engineering practices, established codes, standards, modeling techniques, and best practices.

See the [DHS NOFO NSGP-NSS](#), Appendix A: Evaluation Criteria and Scoring for the specific criteria used for scoring sub-applicant IJs.

2024 NSGP-NSS Investment Justification

Nonprofit sub-applicants with one site may apply for up to \$200,000 for that site. Non-Profit sub-applicants with multiple sites may apply for up to \$200,000 per site, for up to three sites with a maximum of \$600,000 per nonprofit organization. If a nonprofit organization applies for multiple sites, it **MUST** submit one IJ per each site. IJ's cannot include more than one physical site.

The IJ must describe each investment proposed for funding. The investments or projects described in the IJ must:

1. Be for the location(s)/physical address(es) (NOT P.O. Boxes) that the nonprofit occupies at the time of application;
2. Address an identified risk, including threat and vulnerability, regardless of whether it is submitting for similar projects at multiple sites;
3. Demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA;
4. Be both feasible and effective at reducing the risks for which the project was designed;
5. Be able to be fully completed within the three-year period of performance; and
6. Be consistent with all applicable requirements outlined in this NOFO and the Preparedness Grants Manual.

Nonprofit sub-applicants are required to self-identify with one for the following categories in the IJ as part of the application process:

- a) Ideology-based/Spiritual/Religious
- b) Educational
- c) Medical
- d) Other

Vulnerability/Risk Assessment

Each nonprofit sub-applicant must include a vulnerability/risk assessment unique to the site the IJ is being submitted for. INA

Mission Statement

Each nonprofit sub-applicant must include its Mission Statement and any mission implementation policies or practices that may elevate the organization's risk. SAAs will use the Mission Statement along with the nonprofit sub-applicant's self-

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identification in the IJ to validate that the organization is one of the following types: 1) Ideology-based/Spiritual/Religious; 2) Educational; 3) Medical; or 4) Other. The organization type is a factor when calculating the final score of the application; see Section E “Application Review Information,” subsection “Final Score.”

V. SUBMITTING THE APPLICATION

1. Read this Funding and Allocation Methodology.
2. Review the [NSGP-NSS Quick Start Guide](#) and [DHS NOFO NSGP-NSS](#).
3. Read the [FEMA Preparedness Grant Manual - 2024](#).
4. If beneficial for your organization, request technical assistance from the NMDHSEM Grants Management dhsem-grantsmanagement@state.nm.us. Be sure to include **2024 NSGP-NSS Grant Program** in the subject line of your email.
5. Prepare and email the attached Nonprofit Security Grant Program Investment Justification (FEMA Form FF-207-FY-21-115 [formerly 089-25] (10/24), NMDHSEM Supplemental Application and all supporting documentation to dhsem-grantsmanagement@state.nm.us **no later than 5:00 p.m. MST on January 3, 2025**. Be sure to include: **2024 NSGP-NSS Grant Program Application – Applicant Name** in the subject line. **Applications submitted after this deadline will not be accepted.**
6. For the IJ and supplemental NMDHSEM application, an electronic certified signature is acceptable. Scan of hard copy wet ink signatures is also acceptable.

W. IMPORTANT DATES

Deadline	Description
November 27, 2024	Release of 2024 NSGP-NSS State Funding Announcement and Allocation Methodology, and Application
December 9, 2024	2024 NSGP-NSS Webinar – Rescheduled for 12/12/24 @ 9:30 a.m. to 11:00 a.m.
January 3, 2025	2024 NSGP-NSS Application due to NMDHSEM by Close of Business 5:00 p.m. MST
January 6 – 10, 2025	NM DHSEM Review of IJs and Request for Information (RFI) process
January 13 – 17, 2025	2024 NSGP-NSS IJs Review Process
January 24, 2025	NMDHSEM State 2024 NSGP-NSS application due to FEMA
45 – 60 days following FEMA’s award of funds to State; award and denial letters sent to applicants	
45 – 60 days following FEMA’s award of funds to State; Sub-grants awarded to applicants (Sub-grants will be sent only after FEMA awards the grant to State)	

X. RESOURCES:

The following are links to websites that can provide you helpful information on the 2024 NSGP-NSS:

- [Fiscal Year 2024 Nonprofit Security Grant Program \(NSGP\) Sub-applicant Quick Start Guide](#)
- [U.S. Department of Homeland Security \(DHS\) Notice of Funding Opportunity \(NOFO\) Nonprofit Security Grant Program \(NSGP\) National Security Supplement \(NSS\)](#)
- [Nonprofit Security Grant Program – National Security Supplemental Fact Sheet](#)
- [Nonprofit Security Grant Program – National Security Supplemental Key Changes](#)
- [Nonprofit Security Grant Program – National Security Supplemental Frequently Asked Questions](#)
- [Nonprofit Security Grant Program - National Security Supplemental Consortium Application Guide](#)
- For technical assistance, email: dhsem-grantsmanagement@state.nm.us.