

**FISCAL YEAR 2007  
URBAN AREAS SECURITY INITIATIVE (UASI)  
NONPROFIT SECURITY GRANT PROGRAM (NSGP)**

**ADDITIONAL FOLLOW UP  
QUESTIONS AND ANSWERS**

**The guidance talks about “international” terrorism, but does not mention “domestic” terrorism? Would threats of or acts of terrorism by “domestic” groups be allowed as part of the justification for eligibility and inclusion in the Investment Justification (IJ)?**

- A. The statute appropriating funds specifically calls out “international” terrorism. Therefore, threats or acts of “international” terrorism are to be reviewed, scored, and prioritized in the IJ.

These threats or acts of “international” terrorism would apply to both 1) actual international organization/cell threats or acts, and 2) internationally motivated threats.

Thus, nonprofit applicants can address the direct international threat from an organization/cell or the threat from a group (domestic/”homegrown” or international) basing their motivations on international issues/cells/threats (i.e. inspired by foreign/international groups) in their IJ.

**What if my nonprofit organization (churches, synagogues, religious/sectarian educational institutions, etc.) does not hold or has not formally applied for a 501(c)(3) registration number?**

- A. In accordance with the statute appropriating funds and in support of the intent of the program to provide support to nonprofit institutions at a high risk of terrorist attack, nonprofit organizations may show their tax-exempt status through an affidavit or other indicia certifying or verifying their 501(c)(3) compliance, if they do not have a 501(c)(3) registration number or IRS *Letter of Recognition*.

An affidavit of 501(c)(3) compliance must be signed by the nonprofit organization’s chief executive officer, or his/her designee, and must certify that the nonprofit organization meets the compliance/status as a 501(c)(3) federally tax-exempt organization, as outlined by the IRS at <http://www.irs.gov/charities/charitable/article/0,,id=96099,00.html>.

To be tax-exempt under 26 U.S.C. § 501(c)(3) of the Internal Revenue Code, an organization must be organized and operated exclusively for purposes set forth in section 501(c)(3), and none of its earnings may inure to any private shareholder or individual. In addition, it may not attempt to

influence legislation as a substantial part of its activities and it may not participate in any campaign activity for or against political candidates. For additional information on meeting 501(c)(3) tax exempt compliance, applicants may refer to IRS publication 557.

The SAA will be responsible for maintaining the affidavit and/or other indicia on file for review by DHS, as necessary.

**Has the submission deadline for FY 2007 NSGP applications been extended?**

- A. No. Completed applications must be submitted via Grants.gov no later than 11:59 p.m. Eastern Daylight Time, June 22, 2007.

**The guidance differs in terms of substantiation of threats or attacks. Page 2 of the NSGP guidance refers to attacks against the site or “directly” related sites, while the further guidance and the IJ terms also notes “closely” related sites. There is a difference between the two terms, directly and closely. For consistency, what term should be used?**

- A. Prior threats or attacks (within or outside the U.S.) directly against the organization/site, as well as threats or attacks against closely related organizations/sites are eligible to be identified, reviewed and scored in the IJ.

**To evaluate eligibility, can you clarify what parameters DHS would use to consider a site to be 'highly-recognized'? Should the evaluation consider how recognizable the nonprofit organization/site is at a “national” level or a “local” level?**

- A. Eligibility is limited to nonprofit organizations (as described under section 501(c)(3) of the Internal Revenue Code of 1986 and exempt from tax under section 501(a) of such Code) that are at **high risk of international terrorist attack** and are located within one of the specific UASI-eligible urban areas. Whether an eligible applicant is recognizable at the national or local level should not impact the eligibility criteria identified in the guidance.

Additionally, the review and evaluation considering how recognizable the nonprofit organization/site is should be relative to the insight from the State, UAWG, and local Citizen Corps Council level. Thus, a local level evaluation of how recognizable the nonprofit organization/site is will suffice.

Final review and award determinations will be made by DHS.

**Are nonprofit organizations in jurisdictions outside the eligible FY 2007 UASI areas eligible to apply for funds via the FY 2007 NSGP?**

- A. Nonprofit organizations in jurisdictions outside the eligible FY 2007 UASI areas are not eligible to apply for funds under the FY 2007 NSGP. State and local jurisdictions should leverage other available HSGP funding to support and/or fund other identified nonprofit organizations that may be at high risk of terrorist attacks, in accordance with requirements set forth in respective program guidance and their State and Urban Area Homeland Security Strategies.

**What documentation can the SAA/UAWG Review Panel use to validate or substantiate the risks identified in the proposed IJ?**

- A. The SAA may use documents such as identified/submitted police reports, insurance claims, news reports, etc. to validate or substantiate the risks identified in the proposed IJs.

**Who is responsible for completing any risk assessments? If a nonprofit has a completed risk assessment, is anyone required to determine the validity of the assessment?**

- A. The NSGP Guidance and IJ template state that the nonprofit can provide findings from previously conducted risk assessments. Therefore, the nonprofit organization is responsible for completing/conducting any risk assessments. During the review, scoring, and prioritization process, the SAA/UAWG review panel may request a copy of the assessment to support its ability to verify and/or substantiate any risk-related information during the review process.

**Can multiple 501(c)(3)'s apply under one IJ application?**

- A. Multiple 501(c)(3)'s cannot submit one bundled application. Each eligible 501(c)(3) applicant must submit their own individual IJ application for a maximum \$100,000 award.

However, an umbrella group/parent organization may submit one application on behalf of its separate sites/agencies in an eligible urban area. In this case, the maximum award would be \$100,000, total, and disseminated by the umbrella group/parent organization. Otherwise, each individual 501(c)(3) organization/site would have to submit its own application for up to \$100,000.

Jurisdictions that are coordinating their proposed application and target hardening activities with other nonprofit organizations and/or facilities should note this, along with the name of the nonprofit organization and facility, in Section V, Project Management, of the IJ.

**Where should requested training costs be included in the IJ?**

- A. Section IV, Target Hardening Activity of the IJ provides space to “describe the proposed target hardening activity, including total funds requested.” This space is available for requested equipment and training, as well as allowable M&A expenses.

**Equipment costs are limited to only two categories from the AEL. Did DHS purposely omit AEL category 21, Other Related Equipment Costs, which includes vendor training costs, shipping, installation, etc.?**

- A. The full AEL category 21 is not allowable. However, costs inherent to the purchase of equipment, such as shipping, taxes, and/or installation can be included in the bundled cost for the requested equipment. Training on the use of the equipment would not be eligible as an expense under the grant program, but could be conducted/funded as part of the match requirement.

**Please clarify how training costs can be used as a match for equipment costs?**

- A. As stated in the guidance, “Allowable training-related costs under NSGP are limited to attendance fees for the training, and related expenses, such as materials, supplies, and/or equipment.” Therefore, a nonprofit could purchase equipment, and an eligible match could include training for that equipment, if the training costs were not paid for with grant funds. Additionally, other CI/KR protection training, as noted in the guidance, not funded with federal funds could be eligible to meet the match.

**If a specific training course/activity is used as a match, can HSGP, IPP, or NSGP grant funds be used to pay for it?**

- A. No. Training may be used as a match; however, if it is used as a match, it cannot be paid with grant funds.

**Page 10 of the NSGP guidance includes an example of adherence to standards for PPE, but PPE is not allowable.**

- A. This is standard language for all grants. PPE is not allowable; however, please refer to the AEL located on the FEMA National Preparedness Directorate website at <http://www.ojp.usdoj.gov/odp/equipment.htm> or at <https://www.rkb.mipt.org/> to see if there are any standards associated with the equipment that you request/purchase under this program.

**Can you be more specific as to what training costs are or are not allowed? For example, are instructor costs eligible (for bringing in a vendor to teach the course since travel costs to a course are not permitted)?**

- A. The Guidance states “only allowable training-related costs under NSGP are limited to attendance fees for the training, and related expenses, such as materials, supplies, and/or equipment.” Therefore, instructor fees would not be eligible as they are beyond attendance fees and supplies/materials for the attendee.

**Page 13 of the NSGP guidance notes the minimum NIMS training is IS-700, while other training is only recommended. Per the NIMS website, NGO minimum also includes IS-800 and 100-400 depending on the site's role in a response. Which training is the minimum required training?**

- A. IS-700 is the minimum required training. If the NGO is involved in a larger response role, they should follow appropriate guidelines as set forth by the NIMS Integration Center (NIC).

**Who from the nonprofit organization is required to complete the NIMS IS-700 course? Does the SAA need to have a copy of their certificate of completion?**

- A. The guidance states that “all emergency preparedness, response, and/or security personnel in the organization participating in the development, implementation, and/or operation of resources and/or activities awarded through this grant must complete the NIMS IS-700 course.” The SAA is not required to keep a copy of their certificate of completion; however, the nonprofit organization should have these certificates available to share with the SAA, upon request, in support of any reporting and/or monitoring processes.

**M&A costs are eligible, but there is no inclusion or discussion of M&A costs in the IJ. Will funding recipients receive an additional 3% from DHS to cover those costs or does this need to be addressed at all in the IJ?**

- A. There will be no additional M&A funds provided beyond the requested and funded IJ requests. Each SAA will be eligible to spend up to 3% of the total award on M&A. This can be passed through to locals, if desired.

Therefore, M&A costs should be addressed in the IJ. If M&A costs are not addressed in the IJ, the SAA may take 3% off the top of the overall award for allowable M&A costs.

**Can you provide additional information on the match requirement for each allowable category?**

- A. You do not need to match 75/25 in each eligible category (i.e. equipment, Training, and M&A). As long as the overall 25% match includes eligible

costs, no matter what eligible category, it can serve to meet the match requirement.

**Why are travel costs authorized under M&A?**

- A. Travel under M&A supports program monitoring activities and this category is limited to 3% of the overall award.

**The equipment section does not discuss construction or renovation. If installation of eligible equipment includes construction or renovation, is that allowed? Can renovation or construction costs directly related to installation be used as matching costs?**

- A. Request for construction or renovation related activities will be evaluated on a case-by-case basis. Any questions related to construction or renovation should be provided to your Preparedness Officer. However, generally speaking, the allowable activities under this program (fencing, barriers, security systems, etc.) are not considered “construction”. Additionally, all NEPA considerations apply.

**The guidance states that the SAA in coordination with the UAWGs and local Citizen Corps Council must develop a prioritized list of IJ proposals. Does that simply mean that the submitted IJ requests must be reviewed and scored based upon the methodology provided on a scale from 1-5, and the resulting scored/prioritized list must be submitted as an attachment to the grant application?**

- A. Yes, submitted IJs should only be review and scored overall on a scale from 1-5 based upon the methodology provided. No subdivision of scores per question needs to occur. The resulting prioritized scores must be submitted as an additional attachment in the grants.gov application. An excel format is preferred.

**Is there a cut-off on the number of applicants that the state can submit through grants.gov?**

- A. No. All IJ requests can be submitted via grants.gov. Due to size restrictions and time constraints for uploading files, we recommend that all submitted IJs be combined into one PDF file and this one (1) file be uploaded to grants.gov with the application submission.

**Page 10 of the NSGP guidance includes a bullet for evaluation as to how the site integrates its preparedness efforts with the local Citizen Corps Council. However, the application information does not include this bullet statement. Does DHS assume this topic should be discussed under the bullet of explaining the site's role in a response or recovery to an incident?**

- A. Yes, DHS assumes that this integration will be discussed under the bullet that explains the organization/site's role in a response or recovery to an incident.

**Are there any restrictions on the use or pass-through of M&A funds available to the SAA?**

- A. 3% of total award is available to be distributed for M&A at the discretion of the SAA, in accordance with allowable M&A expenses described in the guidance.

**Once individual nonprofits are selected for funding, will the UAWG have any grant management function or responsibility? Does DHS expect the SAA to pass-through these funds directly to the individual nonprofits, and thus not require additional work of the UAWG?**

- A. Awarded funds, minus any allowable M&A expenses, must be passed through directly to the nonprofit organization, and, thus, will not require any additional work of the UAWG.

**Will the NSGP be reported through the Biannual Strategy Implementation Report (BSIR)?**

- A. Yes, reporting through the BSIR will be required.

**During award closeout, there is a requirement for the submission of a final CAPR and a Final Report on program accomplishments. If the program accomplishments are provided in block 12 of the CAPR, will that report suffice?**

- A. A final BSIR will be required to address all final closeout reporting.

**Did DHS make the program guidance and press release publicly available?**

- A. Yes, the program guidance was announced by DHS via a press release and also distributed via an Information Bulletin to all SAA, HSA, and UASI points of contact. These materials are also available on the web at [http://www.ojp.usdoj.gov/odp/grants\\_programs.htm#fy2007UASI](http://www.ojp.usdoj.gov/odp/grants_programs.htm#fy2007UASI). Outreach calls were also conducted with nonprofit organizations in coordination with the DHS Office of Faith-Based Initiatives.