

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

**QUESTIONS AND ANSWERS**

**Who will determine whether an organization is a terrorist group?**

The statute requires applicants to identify prior threats or attacks toward the nonprofit or directly related organization (within or outside the United States) by a terrorist organization, network, or cell against the organization. Information provided by the applicant nonprofits will be reviewed by several DHS components, including the Office of Intelligence and Analysis, to evaluate the threats and ensure that terrorist groups cited by the applicants are, in fact, defined as terrorist groups by the U.S. Department of State.

**Does a nonprofit have to be threatened by a terrorist group in order to be eligible?**

No, an identified and substantiated threat from a terrorist organization is only one of the determining criteria. Other criteria for determining whether a nonprofit is eligible for NSGP funding include an organization's symbolic value that would make it a likely terrorist target, a prior vulnerability assessment that shows an organization is at high risk of an attack, proximity of an organization to other key assets or critical infrastructure at high risk of an attack, or the role of an organization in responding to a terrorist attack that would increase its risk. A nonprofit organization can demonstrate risk by meeting any or all of these criteria.

**Does an "identified and substantiated threat" have to come from an Islamic extremist group?**

No. The UASI NSGP is focused on applicants who are at high risk of terrorist attack, but does not require threats that are identified and substantiated in the application process by nonprofits to come from Islamic extremist groups.

**How does the department define terrorism?**

No one definition of terrorism has gained universal acceptance. However, Title 22 of the United States Code, Section 2656f(d) contains the following definitions:

- The term "terrorism" means premeditated, politically motivated violence perpetrated against noncombatant targets by subnational groups or clandestine agents, usually intended to influence an audience.
- The term "terrorist group" means any group practicing, or that has significant subgroups that practice terrorism.

The U.S. Government has employed this definition of terrorism for statistical and analytical purposes since 1983.

**How does the Department determine which organizations are most at risk?**

Applications will be reviewed in two phases to leverage local knowledge and understanding of the applicant's risk for terrorist attack while also ensuring coordination and alignment with Federal, State, and local preparedness efforts.

First, applications will be reviewed and prioritized by the respective Urban Area Working Group (UAWG) in coordination with the local Citizen Corps Council, if they are separate entities. As part of the Urban Area Security Initiative (UASI) Nonprofit Security Grant Program application, the State Administrative Agency (SAA) must work with the UAWG and local Citizen Corps Council to develop a prioritized list of nonprofit proposals and submit that list with the investment justifications through grants.gov.

Applications will then be reviewed and award determinations made through a panel of evaluators from across DHS, including FEMA and components from within the Office of Infrastructure Protection (e.g., Protective Security Coordination Division, Office of Bombing Prevention), the Domestic Nuclear Detection Office (as applicable), and the Office of Intelligence and Analysis.

Evaluation criteria include such items as:

- Identification and substantiation of prior threats or attacks toward the nonprofit or closely related organization (within or outside the U.S.) by a terrorist organization, network, or cell against the applicant
- Symbolic value of the site(s) as a highly recognized national or historical institution that renders the site a possible target of terrorism
- Proximity of the nonprofit organization to identified CI/KR
- Role of the applicant nonprofit organization in responding to terrorist attacks
- Findings from previously conducted threat and/or vulnerability assessments
- Integration of nonprofit preparedness with broader state and local preparedness efforts to include coordination with the Citizen Corps Council
- Complete, feasible investment justifications that address an identified risk, including threat, vulnerability or consequence

**Will the Secretary certify that a threat has been made to a particular group?**

No. The updated guidance from the FY 2007 DHS appropriations bill establishes that applicants shall identify for the Secretary's consideration prior threats or attacks (within or outside the United States) by a terrorist organization, network, or cell against an organization and does not require the Secretary to certify that threat.

In applying for a grant, nonprofit organization applicants must submit an Investment Justification that details:

- Prior threats or attacks toward the nonprofit or closely related organization, either within or outside the U.S., against the nonprofit by a terrorist organization
- Symbolic value of a nonprofit site that renders it a possible terrorist target
- Nonprofit organization's role in responding to or recovering from terrorist attacks
- Findings from previously conducted risk assessments including threat, vulnerability or consequence

**Why does NSGP only provide support to nonprofit organizations in FY 2007 UASI cities?**

The FY 2006 DHS Appropriations Act linked the Nonprofit Security Grant Program to the UASI Grant Program. Funds for NSGP are part of the UASI appropriation, thus NSGP is part of UASI. UASI has always been risk-based, with the focus on supporting the highest risk urban areas and nonprofit organizations.

Not all eligible nonprofit organizations and UASI communities are guaranteed to receive funding under the FY 2007 NSGP. Allocation decisions will be made based on risk and how well applicants address program requirements through their investment justifications.

**What is the purpose of the FY 2007 Urban Areas Security Initiative (UASI) Nonprofit Security Grant Program (NSGP)?**

The FY 2007 NSGP will provide funds to support security enhancements to property owned or leased by nonprofit organizations at high risk of attack from terrorist organizations. While this funding is provided specifically to high-risk nonprofit organizations, the program seeks to integrate nonprofit preparedness activities with broader State and local preparedness efforts and promote coordination and collaboration in emergency preparedness activities among public and private community representatives, State and local government agencies, and Citizen Corps Councils.

**How much funding will be awarded through the FY 2007 NSGP?**

The UASI Nonprofit Security Grant Program will provide \$24,007,500 to high-risk nonprofit organizations. Each eligible nonprofit organization may apply for up to a \$100,000 grant award. The awardees will have up to 24 months to spend their awards.

**Why has it taken so long to release the NSGP Guidance and Application Kit?**

Although these are FY 2006 funds, the issue of how DHS could meet the congressional requirements for award, i.e. how the Secretary could reliably “certify” the threat to a selected nonprofit organization, was not resolved until passage of the FY 2007 DHS Appropriations Bill in October 2006. In the bill, Congress amended the 06 language, dropping the certification requirement clarifying that grants would be made to organizations at high risk of attack, and directing that grants be awarded by September 30, 2007.

**Which nonprofit organizations are eligible to apply for NSGP funding?**

Any nonprofit organization (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 is at high risk of terrorist attack and is located within one of the FY 2007 UASI areas is eligible to apply.

Criteria for determining eligible applicants who are at high risk of terrorist attack include, but are not limited to:

- Identification and substantiation (e.g. police reports or insurance claims) of prior threats or attacks toward the nonprofit or closely related organization (within or outside the U.S.) by a terrorist organization, network, or cell against the nonprofit organization
- Symbolic value of the site(s) as a highly recognized national or historical institution that renders the site a possible target of terrorism
- Role of the applicant nonprofit organization in responding to or recovering from terrorist attacks
- Findings from previously conducted risk assessments including threat, vulnerability, or consequences

Not all eligible nonprofit organizations and UASI communities are guaranteed to receive funding under the FY 2007 NSGP. Allocation decisions will be made based on risk and how well applicants address program requirements through their investment justifications.

### **What can the nonprofit organizations use these federal grant dollars for?**

Allowable costs are focused on target hardening activities, which can be accomplished through training or the purchase or 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 attack. Additionally, nonprofit organization security personnel may use NSGP funds to attend security-related training courses and programs. Allowable training-related costs under NSGP are limited to attendance fees for the training, and related expenses, such as materials, supplies, and/or equipment. Overtime, backfill, and/or travel expenses are not allowable costs. Allowable training topics are limited to the protection of CI/KR, including physical and cyber security, target hardening, and terrorism awareness/employee preparedness.

Additionally, up to 3 percent of the total award amount may be used for management and administration (M&A) purposes by the State. M&A activities are those defined as directly relating to the management and administration of the grant funds, such as financial management and monitoring.

The grantee may meet a soft match requirement through cash, training investments related to use of equipment purchased with the grant, or training investments related to general purpose security and emergency preparedness for staff. In the case of training projects, awardees must meet the matching requirement through cash. In no event can regular personnel costs such as salary, overtime, or other operational costs unrelated to training be used to satisfy the matching requirement.

### **Why are the State Administrative Agencies (SAA) involved in the application process?**

To be consistent UASI and other homeland security grant programs, the SAA is the only entity eligible formally to apply for these funds. Applications must be provided to the SAA from

eligible 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 terrorist attack and are located within one of the FY 2007 UASI areas.

**Was there any stakeholder involvement in the guidance and application development process?**

As with the development of other DHS grant programs, DHS solicited the input of stakeholders on the NSGP guidance and application development process. A December 2006 working group of selected stakeholders, as well as regular discussions with nonprofit organizations, provided valuable feedback that helped DHS develop the NSGP.