Federal Fiscal Year 2024 Department of Homeland Security (DHS) Nonprofit Security Grant Program - National Security Supplemental (NSGP-NSS) Application Kit State Overview and Guidelines

Overview and Eligibility

The Alaska Division of Homeland Security and Emergency Management (DHS&EM) is soliciting applications for the Federal Fiscal Year (FY) 2024 Nonprofit Security Grant Program - National Security Supplemental (NSGP-NSS). **Applications are due by 12:00 pm, Monday, December 23, 2024**; DHS&EM serves as Alaska's State Administrative Agency (SAA) for the NSGP-NSS.

The NSGP-NSS is a reimbursable, federally funded pass-through grant program that assists local nonprofit organizations' facilities at risk of terrorist or other extremist attacks with physical security enhancements and other security-related activities.

The FY 2024 pass-through target allocation for Alaska is \$1,567,200. The federal award date of funding to the State of Alaska is anticipated to will be no later than May 10, 2025, and Alaska's NSGP-NSS subrecipient performance period is anticipated to from June 1, 2025, through April 30, 2027.

The complete FFY 2024 FEMA NSGP-NSS Notice of Funding Opportunity is available on the DHS&EM website at DHS&EM | Nonprofit Security Grant Program National Security Supplemental (NSGP-NSS) (alaska.gov).

Nonprofit organizations are eligible as subapplicants for this program must meet the definition of nonprofit organization described under section 501(c)(3) of the Internal Revenue Code of 1986 (IRC) and be exempt from tax under section 501(a) of such code. 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 recognition of exemption under 501(c)(3), the state will require recognition of exemption.

- AND: Be able to demonstrate, through application, that the organization is at high risk of a terrorist or other extremist attack.
- AND: Be located outside of an FY 2024 UASI-designated high-risk urban area (all nonprofits physically in Alaska meet this requirement).
- AND: 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
- The organization must agree to comply with the standards, regulations, and requirements applicable to subrecipients receiving pass-through subawards found in 2 CFR Part 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (<u>http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=dcda7ff3275e13d43b34534d456521d7&mc=true&n=pt2.1.200&r=PART&ty=HTML)</u>

Financial and program management standards in 2 CFR include, but ARE NOT limited to, requirements of financial management systems, established internal controls, procurement standards procedures for

determining costs, property management standards, acceptance of audit applicability, programmatic and financial reporting requirements, and record-keeping requirements.

If, in review with successful applications, it is determined a subapplicant may have difficulty meeting the subrecipient requirements of 2 CFR Part 200, a state-managed award may be available. This will be determined through discussion after award notifications are made.

NOTE: The State of Alaska WILL NOT be accepting Consortium Applications in the FY24 NSGP-NSS.

If you feel your organization would have difficulty meeting any of the grant requirements, please contact DHS&EM.

Funding Priorities and Objectives

The NSGP-NSS is an assistance program that provides funds enhance capabilities of eligible nonprofits to prevent, protect against, prepare for, and respond to terrorist or other extremist attacks. The NSGP-NSS goal is to improve and increase the physical/cyber security and facility/target hardening of nonprofit organizations' facilities at risk of a terrorist of other extremist attack, ultimately safeguarding the lives and property of the American people. All NSGP-NSS activities must be linked to enhancing the security and safety at the physical site of the nonprofit organization.

DHS/FEMA priority for NSGP-NSS is:

• Enhancing the protection of soft/targets/crowded spaces

The following are identified by DHS/FEMA as second-tier priority areas/enduring needs:

- Effective planning
- Training and awareness campaigns
- 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 <u>Cybersecurity and</u> <u>Infrastructure Security Agency</u>, <u>Cross-Sector Cybersecurity Performance Goals</u>, and the <u>National Institute of</u> <u>Standards and Technology</u>.

The State of Alaska directs that the 2024 NSGP-NSS works towards target hardening projects and projects related to security training for nonprofit staff, planning-related costs, and exercise-related costs, in addition to allowable target hardening equipment.

The NSGP-NSS objectives for nonprofit organizations are:

- provide funding for physical and cybersecurity enhancements and other security-related activities to enhance the protection of soft targets and crowded places
- Integrate preparedness activities with state and local preparedness efforts
- Address and close gaps identified in individual nonprofit organization Vulnerability Assessments

The NSGP-NSS plays an important role in the implementation of the National Preparedness Goal (<u>https://www.fema.gov/emergency-managers/national-preparedness/goal</u>) the NSGP-NSS supports FEMA's efforts to instill equity as a foundation of emergency management (Goal 1), as well as promote and sustain a ready FEMA and prepared nation (Goal 3) through supporting the building, sustainment, and delivery of core capabilities (<u>https://www.fema.gov/core-capabilities</u>) through eligible activities.

Core capabilities require the combined effort of the whole community rather than the exclusive effort of any single organization or level of government. The NSGP-NSS allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas (<u>https://www.fema.gov/mission-areas</u>) and encourage whole community involvement in project development.

Project Eligibility

Each nonprofit subapplicant may only represent one site/location/physical address per Investment Justification. For example, a nonprofit organization with one site may apply for up to \$200,000 for that site (on one IJ).

Nonprofit organizations with multiple sites/locations/physical addresses may choose to apply for another additional site for up to \$200,000, for a maximum of two sites, and *not to exceed \$400,000 per subapplicant*. Each site's individual IJ must:

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

Allowable Costs and Activities

Below is not an all-inclusive list. Please review the FFY 2024 DHS Notice of Funding Opportunity and the FEMA Preparedness Grants Manual for additional information and project examples.

Planning: NSGP-NSS funds 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 considerations as well as those with limited English proficiency. Planning should be flexible enough to address incidents of varying types and magnitudes.

Equipment: Allowable costs are focused on facility hardening and physical security enhancements the nonprofit occupies at the time of application. 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. The allowable equipment categories and equipment standards for FY 2024 NSGP-NSS can be found in the FY2024 NSGP-NSS NOFO or on the DHS&EM website. Unless otherwise stated, equipment must meet all mandatory regulatory and/or FEMA-adopted standards to be eligible for purchase using these funds, including the American Disabilities Act. In addition, recipients will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment. Installation and training on the equipment should be included in the cost of the equipment. Subapplicants 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).

The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees is allowable under all active and future grant awards unless otherwise noted. Federal guidance (Preparedness Grants Manual) also provides guidance on the support of equipment previously purchased with both federal grant and non-federal grant funding. While these activities may be submitted, they are not a priority for the state. General maintenance and repairs are not allowable.

Recipients using NSGP-NSS funds to support emergency communications equipment activities must comply with the SAFECOM Guidance on Emergency Communications Grants, which includes provisions on technical standards that ensure and enhance interoperable communications. This SAFECOM Guidance can be found on the Funding and Sustainment page on CISA.gov.

For additional information on allowable equipment costs, please see the DHS Notice of Funding Opportunity and the FEMA <u>Preparedness Grants Manual</u>.

Subapplicants should analyze the cost benefits of purchasing versus leasing equipment, especially highcost 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 not limited to 2 C.F.R. §§ 200.310, 200.313, and 200.316. Also see 2 C.F.R. §§ 200.216, 200.471, and <u>FEMA Policy #405-143-1 – Prohibitions on Expending FEMA</u> <u>Award Funds for Covered Telecommunications Equipment or Services</u>, regarding prohibitions on covered telecommunications equipment or services. Additionally, recipients that are using NSGP funds to support emergency communications Grants, including provisions on technical standards that ensure and enhance interoperable communications. This SAFECOM Guidance can be found at the <u>Funding and</u> <u>Sustainment page on CISA.gov</u>.

The installation of certain equipment may trigger Environmental Planning and Historic Preservation (EHP) requirements. Please reference the EHP sections in this NOFO and the <u>Preparedness Grants Manual</u> for more information. Additionally, some equipment installation may constitute construction or renovation.

Training: Allowable training-related costs under NSGP-NSS include:

- Employed or volunteer security staff to attend security-related training within the United States;
- 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);
- Nonprofit organization's employees or, members/congregants to receive on-site security training.

Training conducted using NSGP-NSS funds must address a specific threat and/or vulnerability, as identified in the subapplicant'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. 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.

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. **Overtime, backfill, and travel expenses are <u>not</u> allowable costs.**

For additional information on allowable training costs, please see the FY 2024 NSGP-NSS Notice of Funding Opportunity.

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. Exercises must be managed and executed per the Homeland Security Exercise and Evaluation Program (HSEEP), be NIMS compliant, and validate existing capabilities.

For additional information on allowable exercise costs, please see the DHS FY 2024-NSGP-NSS Notice of Funding Opportunity and the FEMA Preparedness Grants Manual.

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 <u>IB 441</u>. NSGP-NSS funds may not be used to purchase equipment for contracted security.

Management and Administration (M&A): The state allows subrecipients to use funds for M&A, but it should be included in the project's total cost.

Construction and Renovation: NSGP-NSS funding may not be used for construction and renovation projects without prior written approval from FEMA and is generally not allowable.

In some cases, the installation of equipment may constitute construction and/or renovation. If you have any questions regarding whether an equipment installation project could be considered construction or renovation, please contact your DHS&EM Grants Section. FEMA approval must be requested and received prior before any NSGP-NSS funds are used for any construction or renovation.

Subrecipients requesting construction and renovation projects limited to security systems and critical infrastructure facilities will be required to complete a FEMA EHP Screening Form and Statement of Work at <u>DHS&EM | Grants Section Documents (alaska.gov)</u>.

Unallowable Costs and Activities

Below is not an all-inclusive list. For additional information, please review the DHS FY 2024 Notice of Funding Opportunity and FEMA Preparedness Grants Manual.

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
- Salaries
- 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 beneficiaries or that enhance federal property
- Initiatives which study technology development
- Proof-of-concept initiatives/studies
- Initiatives that duplicate capabilities being provided by the Federal Government
- Organizational operating expenses
- Reimbursement of pre-award security expenses
- Per FEMA policy, the purchase of weapons, weapons accessories, and weapons-related training is not allowed with DHS funds.
- Knox boxes/key safe
- Salaries and personnel costs of planners, equipment managers, exercise coordinators, and/or training coordinators
- Construction and renovation (except in specific equipment installation circumstances)
- Supplanting any expense already budgeted
- Cameras for license plate readers/license plate reader software;
- Cameras for facial recognition software;
- Reimbursable training costs not pre-approved by DHS&EM
- Contracts and procurements over \$10,000.01 not pre-approved by DHS&EM
- Sole source contracts and procurements not pre-approved by DHS&EM
- Stand-alone working meals
- Expenditures not supported with appropriate documentation when submitted for reimbursement. Only
 properly documented expenditures will be processed for payment. Unsupported expenditures will be
 returned for resubmission
- Drawdown of funds prior to expenditure*

* Reimbursement advances with strict guidelines can be requested from DHS&EM

Application Submission Requirements

Each sub-applicant may submit up to IJs for up to \$200,000 in the form of an Investment Justification (IJ). The funding may be requested for up to two sites, but the organization must submit a complete individual IJ for each site. The IJ must describe each investment proposed for funding and all of the following:

- Be for the location(s) that the nonprofit occupies at the time of application;
- Address an identified risk, including threat and vulnerability, and the consequence of the risk;
- Demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA
- Be both feasible and effective at reducing the risks for which the project was designed
- Be able to be fully completed within the two-year period of performance
- Be consistent with all applicable requirements outlined in the NOFO, this guidance, and the FEMA Preparedness Grants Manual.

Subapplicants with multiple sites may apply for up to \$200,000 per site, <u>for up to two sites</u>, for a maximum of <u>\$400,000 per subapplicant</u>. If a subapplicant applies for projects at multiple sites, regardless of whether the projects are similar in nature, it must include an assessment of the vulnerability and risk unique to each site.

Complete application packages consist of:

- 1. Investment Justification Application Form found at <u>DHS&EM | NSGP-NSS (alaska.gov)</u>
- 2. Vulnerability Assessment/Risk Assessment specific to the facility being applied for;
- 3. Mission Statement

Each sub-applicant must include its Mission Statement and any mission-implementing policies or practices that may elevate the organization's risk. SAAs will use the Mission Statement along with information provided in the sub-applicant's IJ in order to validate that the organization is one of the following types: 1) Ideology-based/Spiritual/Religious (Houses of Worship, Religious Schools, etc.); 2) Educational (Secular), 3) Medical (Secular), or 4) Other.

- 4. Signatory Authority Form (available at <u>DHS&EM | Grants Section Documents (alaska.gov)</u> with required three (3) signatures for organization
- 5. Organization's procurement policy, electronic copies are acceptable
- 6. If applicable, any Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA) related to inter-agency projects

Applications are due by 12:00 PM, Monday, December 23, 2024

Applications must be submitted electronically in PDF format with complete signatures or by mail or fax to:

Division of Homeland Security and Emergency Management Attn: Homeland Security Grants Administrator PO Box 5750 JBER, Alaska 99505-5750 Fax : (907) 428-7009 Email: <u>mva.grants@alaska.gov</u> Phone : (907) 428-7000, 1-800-478-2337

Project Review and Selection Process

DHS&EM will review subapplicant submissions to determine application completeness and eligibility based on state and federal program guidance adherence. DHS&EM will also review an organization's previous performance history, if applicable.

The project applications (IJs) will be scored using FEMA's Nonprofit Security Grant Program – National Security Supplemental (NSGP-NSS) Investment Justification (IJ) Scoring Worksheet. The FY 2024 version of this scoring tool is available for review here: <u>https://ready.alaska.gov/Grants/NSGPS</u>.

As prescribed by the federal program guidance, DHS&EM (the SAA) will review applications and recommend to DHS/FEMA which nonprofit organizations should be selected for funding. As part of the state review, the SAAs must:

- Conduct an eligibility review.
- Verify that the nonprofit is located outside a current fiscal year UASI-designated urban area.
- Review and score all **complete** application packages (including mission statements and vulnerability assessments) using the NSGP-NSS Scoring Criteria provided by DHS/FEMA.
- Validate the self-certified organization type listed in the IJ by assessing the central purpose of the nonprofit organization(s) described in the mission statement(s) as either 1) Ideology-based/Spiritual/Religious, 2) Educational, 3) Medical, or 4) Other.
- 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).
- Submit the state review results along with complete applications from eligible subapplicants to DHS/FEMA using the SAA Prioritization Tracker.
- Submit nonprofit organization application details for applications received but not recommended for funding (including incomplete applications and ineligible subapplicants), as well as justification as to why they are not being recommended for funding to DHS/FEMA using the SAA Prioritization Tracker.
- Retain the mission statements and vulnerability assessments submitted by each nonprofit organization.

The SAA will base its recommendations on the SAA's subject matter expertise and discretion with consideration to the following factors:

- Need: The relative need for the nonprofit organization compared to the other subapplicants; and
- Impact: The feasibility of the proposed project and how effectively the proposed project addresses the identified need.

The SAA reviewers will score each question in the IJ according to the scoring matrix in Appendix A of the DHS FY 2024 NSGP-NSS Notice of Funding Opportunity.

Federal Review and Final Score

The IJs submitted by each SAA will be reviewed by a panel made up of DHS/FEMA federal staff. As a part of this review, federal staff will verify that the nonprofit organization is located outside of an FY 2024 UASI-designated urban area. Federal reviewers will review each IJ to 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 organization applying per Section E.1.d "Security Review."

To calculate an application's final score, the sum of the subapplicants' SAA score will be multiplied:

- By a factor of four for nonprofit organizations facing heightened threat resulting from the Israel-Hamas war (subapplicants must draw a <u>clear</u> 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. See the FY2024 page 48 of the NSGP-NSS NOFO for illustrative examples of scenarios that may qualify a nonprofit organization for this multiplier.
- By a factor of three for ideology-based/spiritual/religious entities (e.g., houses of worship, ideologybased/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 subapplicants 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 subapplicant using the address of their physical location. FEMA will add 10 points to applications from organizations in communities identified as "disadvantaged" by CEJST.

Subapplicants 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 nonprofit organizations that are 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 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.

Additional Award and Program Information

If your organization is successful in receiving an award, the following are required:

- Subrecipients must have a UEI number. If you have questions regarding this requirement, contact the Grants Section.
- Subrecipients must complete an Environmental and Historic Preservation (EHP) review on any ground-disturbing activities, communication towers, or modification/renovation of existing buildings or structures. Additional information on EHP Reviews can be found below.
- Subrecipients must have a fiscal and programmatic representative attend the 2024 DHS Grant Award Kick-off meeting in Spring 2025.
- Subrecipients must follow procurement processes and documentation.
- Subrecipients must complete an annual inventory review of grant-funded equipment, if applicable.

Reporting: Each subrecipient must report quarterly progress in Performance Progress Reports on the timelines, milestones, and related project activities. This information is captured as a statewide report used to assess overall program effectiveness, impact, and to report results to Congress.

Quarterly Performance and Financial Progress Reports are required by the 20th of the month following each calendar quarter. Narrative Reports must describe, clarify, and support the expenditures submitted in the Financial Report for reimbursement. NSGP-NSS Report forms are available on the DHS&EM website at DHS&EM | Grants Section Documents (alaska.gov) and are updated as needed or required. Instructions and compliance information are included on the back of both report forms. Organizations are encouraged to use the updated forms from the website each quarter to ensure the most updated information is used. Use of incorrect or outdated forms will be returned and cause payment reimbursement delays.

Each quarterly report should show activity toward the completion of grant-funded projects. Failure to do so may result in the de-obligation of funds. A Final Performance Progress Report is required within 45 days after the end of the performance period. It serves as a summary detailing all project accomplishments, achievements, impacts, challenges, unmet goals, and the reasons why, etc., throughout the entire grant award period. The Final Performance Progress Report does not replace the last Quarterly Performance Progress Report. More information on final reporting can be found on the DHS&EM website.

Environmental and Historic Preservation Compliance: All DHS projects that may have a potential impact on the environment require a FEMA Environmental and Historic Preservation (EHP) review per the Grant Programs Directorate (GPD) Programmatic Environmental Assessment (PEA). Ground-disturbing activities, new construction, including communication towers, or modification/renovation of existing buildings or structures must undergo a FEMA EHP review. For more information on the PEA, see FEMA Information Bulletin (IB) 345 <u>Grant Programs Directorate Information Bulletins | FEMA.gov</u> and http://www.fema.gov/pdf/government/grant/bulletins/fonsi.pdf.

The following activities would not require the submission of the FEMA EHP Screening Form: planning and development of policies or processes; management, administrative, or personnel actions; classroom-based training; tabletop exercises; and acquisition of mobile and portable equipment (not involving installation). While an EHP Screening Form may not be required, an EHP Statement of Work may be required for the items above, especially training, exercise, and mobile/portable equipment. The state reserves the authority to request a review of any approved projects that could potentially fall closely out of these areas.

For more information on FEMA's EHP requirements, grant recipients should refer to DHS&EM's webpage at <u>https://ready.alaska.gov/Grants/OurDocs</u>. Additional information and resources can also be found in FEMA Policy 108-023-1, which is located at <u>https://www.fema.gov/grant-programs-directorate-policy</u>.

Subrecipient Monitoring: DHS&EM will monitor organizations to ensure that project goals, objectives, timeliness, budgets, and other related program criteria are being met. Monitoring will be accomplished through a combination of office-based and on-site monitoring visits. DHS&EM is responsible for providing assurance to FEMA that awards are compliant with federal and state requirements, including but not limited to the accomplishment of project goals, accounting of receipts and expenditures, cash management, maintenance of adequate financial records, and the refunding of expenditures disallowed by audits.

Pass-Through Requirements: The state shall pass-through 95% percent of the total NSGP-NSS funding available to local units of government within 45 days of the receipt of its state award.

Memorandum of Understanding Requirements/State-Managed Awards: The State may retain part of the pass-through funding for expenditures made by the State on behalf of the organization.

Financial Assistance Programs for Infrastructure

a. Build America, Buy America Act

Recipients and subrecipients must comply with the 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, 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 available at

https://www.fema.gov/sites/default/files/documents/fema_build-america-buy-america-act-policy.pdf To see whether a particular FEMA federal financial assistance program is considered an infrastructure program and thus required to include a Buy America preference, please see Programs and Definitions: Build America, Buy America Act | FEMA.gov. and https://www.fema.gov/sites/default/files/documents/fema_build-america-buy-america-actpolicy.pdf

b. Waivers

When necessary, recipients (and subrecipients through their pass-through entity) 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: "Buy America" Preference in FEMA Financial Assistance Programs for Infrastructure | FEMA.gov.

c. Definitions

For BABAA specific definitions, please refer to the FEMA Buy America website at: "Programs and Definitions: Build America, Buy America Act | FEMA.gov."

Please refer to the applicable DHS Standard Terms & Conditions for the BABAA specific term applicable to all FEMA financial assistance awards for infrastructure.

Applications are due by 12:00 PM, Monday, December 23, 2024

Applications must be submitted electronically in PDF format with complete signatures or by mail or fax to:

Division of Homeland Security and Emergency Management Attn: Nonprofit Security Grant Administrator PO Box 5750 JBER, Alaska 99505-5750 Fax : (907) 428-7009 Email: <u>mva.grants@alaska.gov</u> Phone : (907) 428-7000, 1-800-478-2337