

**Federal Fiscal Year 2025 Department of Homeland Security (DHS)
Nonprofit Security Grant Program State (NSGP)
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) 2025 Nonprofit Security Grant Program (NSGP). **Applications are due by 11:59 pm, Monday, January 12, 2026**; DHS&EM serves as Alaska's State Administrative Agency (SAA) for the NSGP.

The NSGP is a reimbursable, federally funded pass-through grant program that assists improves and increases the physical/cybersecurity and facility/target hardening of nonprofit organizations' facilities at risk of a terrorist or other extremist attack, ultimately safeguarding the lives and property of the American people. In FY 2024, the types of equipment nonprofit organizations requested and received the most NSGP funding for included: 1) video assessment and security systems; 2) impact resistant doors and gates; 3) physical access control systems; 4) jersey walls, fences, and other barriers; and 5) fixed area lighting. By providing crucial funding to high-risk nonprofit organizations, the NSGP supports the ability of non-profit organizations to protect themselves and the individuals targeted by affiliation.

The FY 2025 allocation for Alaska is \$1,650,000.00. The State received the FY 2025 NSGP award on September 29, 2025 with all funding being conditionally held by the Federal Emergency Management Agency (FEMA). As FEMA scores and approves subrecipient Investment Justifications, the funding will be released to the State. The subapplicant performance period is anticipated to be 18 months, April 1 2026 to September 30, 2027.

The complete FY 2025 FEMA NSGP Notice of Funding Opportunity is available on the DHS&EM website at <https://ready.alaska.gov/Grants/NSGP>

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. *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.* 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. The final beneficiary of the NSGP grant award must be an eligible nonprofit organization and cannot be a for-profit/fundraising extension of a nonprofit organization. While these for-profit or fundraising extensions may be associated with the eligible nonprofit organization, NSGP funding cannot be used to benefit those extensions and therefore they will be considered ineligible applications. Nonprofit organizations must meet the conditions below.

- 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 a FY 2025 UASI-designated high-risk urban area (all nonprofits physically in Alaska meet this requirement);
- AND: 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 (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>), the FY 2025 Nonprofit Security Grant Program Notice of Funding Opportunity (NOFO), the FEMA Preparedness Grant Manual (PGM), and all terms and conditions on the final obligating award document.

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, conflict of interest, 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.

AND: The FY 2025 NOFO also states subapplicants should not have foreign nationals or noncitizens included. If a subapplicant has foreign nationals, they must be properly vetted and must adhere to all government statutes, policies, and procedures including “staff American, stay in America” and security requirements

AND: Subapplicants/subrecipients must submit short bios and resumes. This should include the type of entity, organizational leadership, and board members along with both the names and addresses of the individuals. Resumes are subject to approval.

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

Funding Priorities and Objectives

Given the evolving threat landscape, it is incumbent to continuously evaluate the national risk profile and set priorities that help ensure appropriate allocation of scarce security dollars. The FY 2025 National Priority Areas (NPAs) reflect FEMA’s broader mission across all preparedness efforts. Applicants should be familiar with these NPAs, as they represent DHS’s current focus areas and may shape future guidance:

- Enhancing Protection of Soft Targets/Crowded Places
- Supporting Homeland Security Task Forces and Fusion Centers
- Enhancing Cybersecurity
- Enhancing Election Security
- Supporting Border Crisis Response and Enforcement

Enduring needs include:

- Effective planning
- Training and awareness campaigns
- Equipment and capital projects
- Exercises

The NSGP will improve and increase the physical/cybersecurity and facility/target hardening of nonprofit organizations’ facilities at risk of a terrorist or other extremist attack, ultimately safeguarding the lives and property of the American people. Concurrently, the NSGP will integrate the preparedness activities of nonprofit organizations that are at high risk of a terrorist or other extremist attack with broader state and local preparedness efforts. The NSGP is an assistance program that provides funds to build and sustain capabilities at the state and local levels to prevent, protect against, prepare for, and respond to terrorist or other extremist attacks. The NSGP goal is to improve and increase the physical/cybersecurity and facility/target hardening of nonprofit organizations’ facilities at risk of terrorist or other extremist attacks, ultimately safeguarding the lives and property of the American people. All NSGP activities must be linked to enhancing the security and safety at the physical side of the nonprofit organization.

In FY 2025, DHS 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 recipients should address with their NSGP funds: **enhancing the protection of soft targets/crowded places**.

The State of Alaska directs that the 2025 NSGP 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 objectives for nonprofit organizations are:

- Enhance equipment and conduct security-related activities to improve the security posture of nonprofit organizations that are at high risk of a terrorist or other extremist attack.
- Address and close capability gaps that are identified in individual nonprofit organizations' Vulnerability Assessments via funding spent on Planning, Equipment, and Training and Exercises that aim to enhance the protection of soft targets and crowded places.
- Strengthen relationships across non-profit organizations, state, local, and territorial homeland security agencies for a whole community approach to preparedness.

The NSGP plays an important role in the implementation of the National Preparedness System (<https://www.fema.gov/national-preparedness-system>) by supporting the building, sustainment, and delivery of core capabilities (<https://www.fema.gov/core-capabilities>) 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 allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas (<https://www.fema.gov/mission-areas>) and encourage whole community involvement in project development.

Project Eligibility

Each nonprofit subapplicant may apply for up to \$200,000 per site. Subapplicants with multiple sites may request up to \$200,000 per site for up to three sites, for a maximum of \$600,000 per nonprofit organization per state. The required application form is the Investment Justification (IJ). Funding may be requested for multiple sites; however, the organization must submit a complete, standalone IJ for each site. Each IJ must describe the investments proposed for funding and must include all of the following:

- Be for the location(s)/physical address(es) (NOT PO Boxes) that the nonprofit occupies at the time of application, if you are leasing or renting at the physical address, documentation of owner's permission to make the proposed security enhancements will be required. If the physical address that will be enhanced is also a private domicile, that information must be disclosed.
- Address an identified risk, including threat and vulnerability, regardless of whether it is submitted for similar projects at multiple sites. See section below on Vulnerability Assessments for further information;
- 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 a two-year period of performance;
- Be consistent with all applicable requirements outlined in the NOFO, this guidance, and the FEMA Preparedness Grants Manual and the award terms and conditions.

Vulnerability Assessment

Each nonprofit subapplicant must include a site-specific vulnerability assessment for the location associated with the IJ. A completed vulnerability assessment identifies the facility's vulnerabilities within the context of credible threats and the potential consequences of an event.

Proposed equipment, projects, and activities must be directly linked to mitigating the specific vulnerabilities identified in the assessment. In this way, the vulnerability assessment serves as the foundation for the IJ content, ensuring that all requested investments address documented security needs.

A vulnerability assessment is different from a risk/threat assessment. A risk assessment involves looking *outside* of an organization to determine external threats that exist that could potentially lead to security issues, whereas a vulnerability assessment involves looking *inside* the organization for internal vulnerabilities and weaknesses. A vulnerability assessment is used to identify and validate your organization's physical security deficiencies.

The federal Cybersecurity and Infrastructure Security Agency (CISA) provides a security self-assessment resource for nonprofit applicants, which was developed for Houses of Worship, available here: <https://www.cisa.gov/topics/physical-security/protecting-houses-worship>. This tool is appropriate for all NSGP applicants, regardless of the nonprofit's identified type- ideology-based/spiritual/religious; educational, medical, or other. The methodology can be used by any nonprofit organization, from a museum to a church to a cultural heritage site.

Vulnerability assessments can be provided in the form of the CISA Self-Assessment, a state or local law enforcement assessment, an assessment by an outside contractor, or another valid method of assessment.

A vulnerability assessment should be **refreshed every five (5) years**, or sooner if substantive changes in vulnerability, and/or safety/security posture have occurred. If a prior fiscal year NSGP grant awarded funds to close a gap on identified on a vulnerability assessment, that should be validated in your vulnerability assessment.

Nonprofits must tie threats/risks to existing physical vulnerabilities and the threats/risks must have a potential terrorism/extremism nexus.

Allowable Costs and Activities

Below is not an all-inclusive list. Please review the FY 2025 DHS Notice of Funding Opportunity and the FEMA Preparedness Grants Manual for additional information. Examples of project types can be found on beginning on page 15 of the FY 2025 NOFO.

Planning:

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, using the Resilience Planning Program | CISA and related Cybersecurity and Infrastructure Security Agency (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.

Equipment:

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 the 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). The allowable equipment categories and equipment standards including the item's plain-language description *specific to the NSGP* can be found beginning on page 44 in the FY 2025 NSGP NOFO. 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, whether with NSGP funding or other sources of funds. Installation and training on the equipment should be included in the cost of the equipment.

The use of FEMA preparedness grant funds for maintenance and sustainment costs, such as maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable under all active and future grant awards unless otherwise noted. The Preparedness Grants Manual and the FEMA Policy 205-402-125-1 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 funding priority for the state. General maintenance and repairs are not allowable.

Subapplicants 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 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 [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, recipients that are using NSGP 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. This SAFECOM Guidance can be found at the [Funding and Sustainment page on CISA.gov](#).

The installation of certain equipment may trigger Environmental Planning and Historic Preservation (EHP) requirements. Please reference the EHP sections in the FY 2025 NOFO and the Preparedness Grants Manual for more information. Additionally, some equipment installation may constitute construction or renovation. Please see the Construction and Renovation subsection for additional information.

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

Training:

Allowable training-related costs under NSGP include:

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);
3. Nonprofit organization's employees or members/congregants to receive on-site security training.

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.

Allowable training-related costs under the NSGP 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.

Training conducted using NSGP funds must address a specific threat and/or vulnerability, as identified in the subapplicant's 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 must be included in the subapplicant's IJ.***

For additional information on allowable training costs, please see the FY 2025 NSGP Notice of Funding Opportunity (NOFO) and the FEMA Preparedness Grants Manual.

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 FY 2025 Notice of Funding Opportunity (NOFO) and the FEMA Preparedness Grants Manual.

Personnel Activities:

Contracted Security Personnel are allowed under this program only as described in the FY 2025 NSGP NOFO and the FEMA Preparedness Grants Manual. The subrecipient must be able to sustain this capability in future years without NSGP funding. Contractual services will be allowed for project-based specific activities only.

Additionally, NSGP recipients and subrecipients contracted security personnel are allowed under this program only as described in the NOFO and must comply with guidance set forth in FEMA [Information Bulletin \(IB\) 441](#) and [IB 421b](#). NSGP 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 and cannot exceed 5%. An organization may use and expend up to 5% of each subaward for M&A purposes associated with that subaward. If an organization receives more than one subaward, they must be able to separately account for M&A costs for each subaward. 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 meeting-related expenses, and salaries of full/part-time staff in direct support of the program. As such, M&A costs are 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.

Construction and Renovation:

NSGP funding may not be used for construction and renovation projects without prior written approval from FEMA. All subrecipients of NSGP funds must have received prior approval from FEMA before any NSGP funds are used for any construction or renovation. Such construction and renovation shall be strictly limited and allowable only when they are necessary components of a security system at critical infrastructure facilities.

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 DHS&EM.

These installation, construction, and renovation projects may need to be submitted to FEMA for compliance review under federal Environmental and Historic Preservation (EHP) laws and requirements before the project is initiated. The following types of projects are considered to constitute construction or renovation and must be submitted through DHS&EM to FEMA for compliance review under EHP laws and requirements prior to initiation of the project:

- Renovation of and modifications, including the installation of security and communication equipment, to buildings and structures that are 50 years old or older;
- Security enhancements to improve perimeter security or any other construction or renovation efforts that change or expand the footprint of a facility;
- Physical security enhancements, including but not limited to:
 - Lighting
 - Fencing
 - Closed-circuit television (CCTV) systems
 - Motion detection systems
 - Barriers, doors, gates, and related security enhancements

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 <https://ready.alaska.gov/Grants/OurDocs>.

Unallowable Costs and Activities

Below is not an all-inclusive list. For additional information, please review the DHS FY 2025 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 (excluding off duty law enforcement personnel in the capacity of contract security)
- 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 beneficiaries or that enhance federal property
- Initiatives which study technology development
- Proof-of-concept initiatives
- Direct or indirect pass-through of benefits to non-eligible entities
- 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
- Construction and renovation (except for those applicable items on page 6)
- Supplanting any expenses already budgeted
- Indirect costs
- Cameras for license plate readers/license plate reader software;
- Cameras for facial recognition software; Earthen barriers, berms, trees, or other botanical obstacles
- Reimbursable training and related travel 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 are 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 before expenditures*
* Reimbursement advances with strict guidelines can be requested from DHS&EM

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Application Submission Requirements and Application Coversheet

Each sub-applicant may apply for up to \$200,000 per site in the form of an Investment Justification (IJ). Funding may be requested for multiple sites, but the subapplicant 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)/physical address(es) (NOT P.O. Boxes) 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.

Using the FY 2025 NSGP NOFO as a guide, subapplicants with multiple sites may apply for up to \$200,000 per site, for up to three sites, for a maximum of \$600,000 per sub-applicant. If a sub-applicant 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. Application Coversheet found at <https://ready.alaska.gov/Grants/NSGP>
2. Investment Justification Application Form (s) found at <https://ready.alaska.gov/Grants/NSGP>
3. Vulnerability Assessment specific to the facility being applied for;
4. Mission Statement:
Each subapplicant 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 subapplicant's IJ to validate that the organization is one of the following types: 1) Ideology-based/Spiritual/Religious; 2) Educational, 3) Medical, or 4) Other.
5. Short bios and resumes:
This should include the type of entity, organizational leadership, and board members, along with both the names and addresses of the individuals. Resumes are subject to approval. The submittal of the organization's website, including board member information, is acceptable. This may include information from the [Division of Corporations, Business and Professional Licensing Search page](#).
6. Signatory Authority Form (available at <https://ready.alaska.gov/Grants/NSGP>) with required three (3) signatures for the organization.

Applications are due by 11:59 pm, Monday, January 12, 2026

Applications must be submitted electronically in PDF format with complete signatures to:

Division of Homeland Security and Emergency Management

Attn: Homeland Security Grants Administrator

Email: mva.grants@alaska.gov 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 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 (NSGP) Investment Justification (IJ) Scoring Worksheet. The FY 2025 version of this scoring tool is available for review here:

<https://ready.alaska.gov/Grants/NSGP>.

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 vulnerability assessments and mission statements, and other required documents) using the NSGP Scoring Criteria provided by DHS/FEMA.
- Validate the self-certified organization type listed in the IJ by assessing the central purpose of the organization described in the Mission Statement as either 1) Ideology-based/Spiritual/Religious, 2) Educational, 3) Medical, or 4) Other.
- Prioritize all received NSGP 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 matrix made available in the FY 2025 Notice of Funding Opportunity.

Federal Review and Final Score

The IJs submitted by each SAA will be reviewed by DHS/FEMA federal staff. As a part of this review, federal staff will verify that the nonprofit organization is located outside of an FY 2025 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 7.B.3 "Security Review" of the FY 2025 Notice of Funding Opportunity.

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

- By a factor of three for ideology-based/spiritual/religious entities (Houses of Worship, Educational Institutions, Medical Facilities, etc.); By a factor of two for secular medical and educational institutions; and
- By a factor of one for all other nonprofit organizations.

Subapplicants who have never received a NSGP award will have 15 points added to their score.

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 have not received prior year funding, and then those prioritized highest by their SAA.

DHS/FEMA will use the final results to make funding recommendations to the Secretary of Homeland Security.

All final funding determinations for subawards 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:

- Subapplicants/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, 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 2025 DHS Grant Award Kick-off meeting in Spring 2026
- Subrecipients must follow procurement processes and documentation.
- Subrecipients must complete an annual inventory review of grant-funded equipment, if applicable.
- Subrecipients must follow the award's applicable DHS Standard Terms and Conditions, available here: <https://www.dhs.gov/publication/dhs-standard-terms-and-conditions>. These are subject to change and will be integrated as part of the obligating award document. Some newer DHS conditions are described below, but the list below is not all inclusive.

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 Report forms are available on the DHS&EM website at [DHS&EM | Grants Section Documents \(alaska.gov\)](https://www.dhs.gov/publication/dhs-standard-terms-and-conditions) 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.

Pass-Through Requirements: The state shall pass-through NSGP funding as required to subrecipients per terms in the Notice of Funding Opportunity.

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 subrecipients.

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 <https://www.fema.gov/grants/preparedness/about/informational-bulletins> 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 out of these areas.

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

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.

Required Use of American Iron, Steel, Manufactured Products, and Construction Materials ***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

Currently FEMA has a *Small Projects General Applicability Waiver*. This waives the need for small projects to comply with the Buy America domestic content procurement preference ("Buy America preference") for otherwise covered infrastructure project purchases. This waiver applies to projects under FEMA financial assistance awards where the total project costs do not exceed the federal simplified acquisition threshold of \$250,000. Based on the FY 2025 Notice of Funding Opportunity, NSGP awards would be eligible for this waiver.

Anti-Discrimination

Recipients must comply with all applicable Federal anti-discrimination laws material to the government's payment decisions for purposes of 31 U.S.C. § 372(b)(4).

- 1) Definitions. As used in this clause –
 - a) DEI means "diversity, equity, and inclusion."
 - b) DEIA means "diversity, equity, inclusion, and accessibility."
 - c) Discriminatory equity ideology has the meaning set forth in Section 2(b) of Executive Order 14190 of January 29, 2025.
 - d) Discriminatory prohibited boycott means refusing to deal, cutting commercial relations, or otherwise limiting commercial relations specifically with Israeli companies or with companies doing business in or with Israel or authorized by, licensed by, or organized under the laws of Israel to do business.
 - e) Federal anti-discrimination laws mean Federal civil rights law that protect individual Americans from discrimination on the basis of race, color, sex, religion, and national origin.
 - f) Illegal immigrant means any alien, as defined in 8 U.S.C. § 1101(a)(3), who has no lawful immigration status in the United States.
- 2) Grant award certification.
 - a) By accepting the grant award, recipients are certifying that:

- i) They do not, and will not during the term of this financial assistance award, operate any programs that advance or promote DEI, DEIA, or discriminatory equity ideology in violation of Federal anti-discrimination laws; and
 - ii) They do not engage in and will not, during the term of this award engage in a discriminatory prohibited boycott.
- 3) DHS reserves the right to suspend payments in whole or in part and/or terminate financial assistance awards if the Secretary of Homeland Security or her designee determines that the recipient has violated any provision of subsection (2).
- 4) Upon suspension or termination under subsection (3), all funds received by the recipient shall be deemed to be in excess of the amount that the recipient is determined to be entitled to under the Federal award for purposes of 2 C.F.R. § 200.346. As such, all amounts received will constitute a debt to the Federal Government that may be pursued to the maximum extent permitted by law.

Non-Supplanting Requirement

Subrecipients of federal awards under this program are prohibited from supplanting. Subrecipients must ensure that federal funds *supplement* but do not supplant (replace) non-federal funds that, in the absence of such federal funds, would otherwise have been made available for the same purpose.

FY 2025 NSGP Applications are due by 11:59 pm, Monday, January 12, 2026

Applications must be submitted electronically in PDF format with complete signatures to:

Division of Homeland Security and Emergency Management
Attn: Homeland Security Grants Administrator
Email : mva.grants@alaska.gov Phone : (907) 428-7000, 1-800-478-2337