application; see Section E "Application Review Information," subsection "Final Score."

The Vulnerability/Risk Assessment and Mission Statement are not to be submitted in FEMA GO but should be maintained by the SAA and must be made available to DHS/FEMA upon request.

11. Intergovernmental Review

An intergovernmental review may be required. Applicants must contact their state's Single Point of Contact (SPOC) to comply with the state's process under Executive Order 12372 (See https://www.archives.gov/federal-register/codification/executive-order/12372.html; Intergovernmental Review (SPOC List) (whitehouse.gov)

12. Funding Restrictions and Allowable Costs

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

Federal funds made available through this award may be used for the purpose set forth in this NOFO, the Preparedness Grants Manual, and the terms and conditions of the award and must be consistent with the statutory authority for the award. Award funds may not be used for matching funds for any other federal awards, lobbying, or intervention in federal regulatory or adjudicatory proceedings. In addition, federal funds may not be used to sue the Federal Government or any other government entity. See the Preparedness Grants Manual for more information on funding restrictions and allowable costs.

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

See the Preparedness Grants Manual for information on prohibitions on expending FEMA award funds for covered telecommunications equipment or services.

b. *Pre-Award Costs*

Recipient (SAA) pre-award costs are allowable only with the prior written approval of DHS/FEMA and as included in the award agreement. To request pre-award costs, a written request must be included with the application, signed by the SAA. The letter must outline what the pre-award costs are for, including a detailed budget break-out of pre-award costs from the post-award costs, and a justification for approval. Subrecipients cannot claim pre-award costs. Please contact your SAA should exigent circumstances exist.

c. ***Management and Administration (M&A) Costs***

M&A costs are allowed by the 2024 DHS Appropriations Act. M&A costs are for activities directly related to the management and administration of the award. M&A activities are those defined as directly relating to the management and administration of NSGP funds, such as financial management and monitoring. M&A expenses must be based on actual expenses or known contractual costs. Requests that are simple percentages of the award, without supporting justification, will not be allowed or considered for reimbursement. M&A costs for the NSGP are calculated as up to 5% of the total Federal award allocated to the recipient, not on final expenditures at close out.

M&A costs are not operational costs but are necessary costs incurred in direct support of the federal award or as a consequence of it, such as travel, meeting-related expenses, and salaries of full/part-time staff in direct support of the program. As such, M&A costs can be itemized in financial reports. Other M&A costs examples include preparing and submitting required programmatic and financial reports, establishing and/or maintaining equipment inventory, documenting operational and equipment expenditures for financial accounting purposes, and responding to official informational requests from state and federal oversight authorities.

Note: SAAs must be able to separately account for M&A costs associated with the NSGP-UA award from those associated with the NSGP-S award.

M&A costs are allowed under this program as described below:

I. SAA (RECIPIENT) FOR NSGP-S AND NSGP-UA M&A

The SAA may use and expend up to 5% of their total FY 2024 NSGP-S and NSGP-UA awards for M&A purposes associated with administering the NSGP-S and NSGP-UA awards. **SA*As must include the amount they are requesting for NSGP-S and NSGP-UA M&A in the SF-424A form.*** The amount should be in addition to the total requested by the subapplicant nonprofit organizations, but not exceed 5% of the total requested by the subapplicant nonprofit organizations. SAAs must be able to separately account for M&A costs associated with the NSGP-UA award from those associated with the NSGP-S.

II. NONPROFIT ORGANIZATION (SUBRECIPIENT) FOR NSGP-S AND NSGP-UA M&A

Nonprofit organizations that receive a subaward under the NSGP may use and expend up to 5% of each subaward for M&A purposes associated with that subaward. If an organization is receiving more than one subaward, they must be able to separately account for M&A costs for each subaward.

d. ***Indirect Facilities & Administrative (F&A) Costs***

Indirect (F&A) costs (IDC) mean those costs incurred for a common or joint purpose benefitting more than one cost objective and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results

achieved. IDC are allowable by the recipient [and subrecipients] as described in 2 C.F.R. Part 200, including 2 C.F.R. § 200.414. Applicants with a current negotiated IDC rate agreement who desire to charge indirect costs to a federal award must provide a copy of their IDC rate agreement with their applications. Not all applicants are required to have a current negotiated IDC rate agreement. Applicants that are not required to have a negotiated IDC rate agreement but are required to develop an IDC rate proposal must provide a copy of their proposal with their applications. Applicants who do not have a current negotiated IDC rate agreement (including a provisional rate) and wish to charge the de minimis rate must reach out to FEMA for further instructions. Applicants who wish to use a cost allocation plan in lieu of an IDC rate proposal must reach out to the FEMA Point of Contact for further instructions. As it relates to the IDC for subrecipients, a recipient must follow the requirements of 2 C.F.R. §§ 200.332 and 200.414 in approving the IDC rate for subawards. For information on procedures for establishing indirect cost rates, see the Preparedness Grants Manual.

d. ***Evaluation Costs***

Per Section H.2 of this NOFO, specific evaluation costs associated with the award or subaward may be allowable. See Section H.2 "Program Evaluation" for more details.

f. ***Other Direct Costs***

I. PLANNING

Planning costs are allowed under this program only as described in this funding notice and the Preparedness Grants Manual.

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 CISA resources. Examples of planning activities allowable under this program include:

i. Development and enhancement of security plans and protocols;
ii. Development or further strengthening of security assessments;
iii. Emergency contingency plans;
iv. Evacuation/Shelter-in-place plans;
v. Coordination and information sharing with fusion centers; and
vi. Other project planning activities with prior approval from FEMA.

II. ORGANIZATION

Organization costs are not allowed under this program.

III. EQUIPMENT

Equipment costs are allowed under this program only as described in this funding notice and the Preparedness Grants Manual.

Allowable costs are focused on facility hardening and physical security enhancements. Funding can be used for the acquisition and installation of security equipment on real property (including buildings and improvements) owned or leased by the nonprofit organization, specifically in prevention of and/or protection against the risk of a terrorist or other extremist attack. This equipment is **limited to select items** on the Authorized Equipment List (AEL). These items, including the item's plain-language description *specific to the NSGP*, are as follows:

AEL Code	Title	Description
03OE-03-MEGA	System, Public Address, Handheld or Mobile	Systems for mass audio notification, including vehicle-mounted high powered speaker systems, or battery powered megaphone/public address systems with corded microphone.
03OE-03-SIGN	Signs	Restricted access and caution warning signs that preprinted or field printable and can be various colors, sizes, and shapes. Examples can include traffic cones, other free-standing signage, mountable items, and signs and devices for individuals with disabilities and others with access and functional needs (e.g., programmable audible caution cones and scrolling marquis signs).
04AP-05-CRED	System, Credentialing	Software application and associated hardware and material for creating site/event credential badges and controlling scene access. Although some hardware may be required, functionality may also be obtainable via subscription as a cloud-based service, as opposed to purchasing software.
04AP-09-ALRT	Systems, Public Notification and Warning	Systems used to alert the public of protective actions or to provide warning to the public in the event of an incident, such as sirens, the Emergency Alert System (EAS), the Integrated Public Alert and Warning System (IPAWS), and Wireless Emergency Alerts (WEA).
04AP-11-SAAS	Applications, Software as a Service	Sometimes referred to as "on-demand software," this application runs on the provider's servers, delivering functionality via the internet to any device having connectivity and the required browser or interface. Access to the application is obtained via a service subscription rather than outright purchase, with all updates and configuration requirements handled by the service provider. *This item is limited to those services that support security systems such as access controls,*

AEL Code	Title	Description
		camera networks, cybersecurity services or other critical infrastructure security.
05AU-00-TOKN	System, Remote Authentication	Systems used to provide enhanced remote authentication, often consisting of a server or synchronization scheme and a device, token, or smartphone application.
05EN-00-ECRP	Software, Encryption	Encryption software used to protect stored data files or email messages.
05HS-00-MALW	Software, Malware/Anti-Virus Protection	Software for protection against viruses, spyware, and malicious code. May be obtained for individual hosts or for entire network segments.
05HS-00-PFWL	System, Personal Firewall	Personal firewall for operation on individual workstations. This item is usually a software solution, but appliances are also available. See also: 05NP-00-FWAL.
05NP-00-FWAL	Firewall, Network	Firewall (software or standalone appliance) for use in protecting networks. See also 05HS-00-PFWL.
05NP-00-IDPS	System, Intrusion Detection/Prevention	Intrusion Detection and/or Prevention System deployed at either host or network level to detect and/or prevent unauthorized or aberrant (i.e, abnormal) behavior on the network.
06CP-01-PORT	Radio, Portable	Individual/portable radio transceivers, for notifications and alerts.
06CP-01-REPT	Repeater	Electronic device that receives a weak or low-level signal and retransmits that signal to extend usable range.
06CC-02-PAGE	Services/Systems, Paging	Paging services/systems/applications; one-way text messaging for notifications or alerts.
06CP-03-ICOM	Intercom/Intercom System	Communication system for a limited number of personnel in close proximity to receive alerts or notifications
06CP-03-PRAC	Accessories, Portable Radio	Speaker/microphone extensions to portable radios.
10GE-00-GENR	Generators	Generators (gasoline, diesel, propane, natural gas, etc.) and their required installation materials, including 10PE-00-PTSW (a power switch) if not already included, to support a redundant power supply for security systems, alarms, lighting, and other physical security/cybersecurity infrastructure or systems.
13IT-00-ALRT	System, Alert/Notification	Alert/notification software that allows for real-time dissemination of information for situational awareness or alerts among a group via means such as smartphones, landlines, pagers, etc. This item may also be a subscription cloud-based service

AEL Code	Title	Description
		using a web browser interface or a mobile application instead of a software.
10PE-00-UPS	Supply, Uninterruptible Power (UPS)	Systems that compensate for power loss to serviced equipment (e.g., short-duration battery devices, standby generator devices for longer duration).
14CI-00-COOP	System, Information Technology Contingency Operations	Back-up computer hardware, operating systems, data storage, and application software necessary to provide a working environment for contingency operations. May be a purchased as a remote service or a dedicated alternate operating site.
14EX-00-BCAN	Receptacles, Trash, Blast-Resistant	Blast-resistant trash receptacles.
14EX-00-BSIR	Systems, Building, Blast/Shock/Impact Resistant	Systems to mitigate damage from blasts, shocks, or impacts, such as column and surface wraps, wall coverings, portable or fix ballistic boards/barriers, breakage/shatter resistant glass, window wraps/films/velums, etc.
14SW-01-ALRM	Systems/Sensors, Alarm	Systems and standalone sensors designed to detect access violations or intrusions using sensors such as door/window switches, motion sensors, acoustic sensors, seismic sensors, and thermal sensors. May also include temperature sensors for critical areas.
14SW-01-ASTN	Network, Acoustic Sensor Triangulation	Network of deployed acoustic sensors and one or more processing nodes for data integration and analysis. Such networks can be set to one or more ranges of frequencies to detect sounds such as gunshots, heavy weapons discharge, explosions, man-portable air defense system launches, vehicle noises, etc., and utilize acoustic triangulation to provide accurate location data. Such networks can be wired, wireless, or hybrid, and are capable of operation near critical infrastructure assets or in wide areas.
14SW-01-DOOR	Doors and Gates, Impact Resistant	Reinforced doors and gates with increased resistance to external impact for increased physical security.
14SW-01-LITE	Lighting, Area, Fixed	Fixed high-intensity lighting systems for improved visibility in areas such as building perimeters, parking lots, and other critical zones to increase physical security.
14SW-01-PACS	System, Physical Access Control	Locking devices and entry systems for control of physical access to facilities.
14SW-01-SIDP	Systems, Personnel Identification	Systems for positive identification of personnel as a prerequisite for entering restricted areas or accessing information systems.

AEL Code	Title	Description
14SW-01-SIDV	Systems, Vehicle Identification	Systems for identification of vehicles, ranging from decals to radio frequency identification or other transponder devices. (License plate reader and facial recognition software are NOT allowed.)
14SW-01-SNSR	Sensors/Alarms, System and Infrastructure Monitoring, Standalone	Standalone sensors/alarms for use on critical systems or infrastructure items (e.g., security systems, power supplies, etc.) to provide warning when these systems fail or are near failure.
14SW-01-VIDA	Systems, Video Assessment, Security	Camera-based security systems utilizing standard, low light, or infrared technology. (License plate reader and facial recognition software are NOT allowed.)
14SW-01-WALL	Barriers: Fences; Jersey Walls	Obstacles designed to channel or halt pedestrian or vehicle-borne traffic to protect a physical asset or facility such as barriers, bollards, planters, benches etc. (Earthen barriers, berms, trees, or other botanical obstacles are NOT allowed.)
15SC-00-PPSS	Systems, Personnel/Package Screening	Hand-held or fixed systems such as walk-through magnetometers used to screen personnel and packages for hazardous materials/devices.
21GN-00-INST	Installation	Installation costs for authorized equipment purchased through FEMA grants.
21GN-00-TRNG	Training and Awareness	See Section D.12.f.iv “Training and Exercises”

Other dropdowns in the Section IV-B of IJ, while not part of the AEL, include the following:

–Code	Title	Description
Contract Security	Private Contact Security Personnel/Guards	See Section D.12.f.vii “Contracted Security Personnel”
M&A	Management and Administration (M&A)	See Section D.12.c “Management and Administration (M&A)”
PLANNING	Planning	See Section D.12.f.i “Planning”
EXERCISE	Exercise	See Section D.12.f.iv “Training and Exercises”

Unless otherwise stated, equipment must meet all mandatory statutory, regulatory, and FEMA-adopted standards to be eligible for purchase using these funds, including the Americans with Disabilities Act. In addition, 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 (see the Maintenance and Sustainment section below for more information).

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

Applicants and 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 this 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.

IV. Training and Exercises

Training and exercise costs are allowed under this program only as described in this funding notice and the Preparedness Grants Manual.

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

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

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.

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.

Training conducted using NSGP funds must address a specific threat and/or vulnerability, as identified in the nonprofit organization's Investment Justification (IJ). Training should provide the opportunity to demonstrate and validate skills learned as well as to identify any gaps in these skills. ***Proposed attendance at training courses and all associated costs using the NSGP must be included in the nonprofit organization's IJ.***

Funding may be used to conduct security-related exercises. This includes costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, and documentation. Exercises afford organizations the opportunity to validate plans and procedures, evaluate capabilities, and assess progress toward meeting capability targets in a controlled, low risk setting. All shortcomings or gaps—including those identified for children and individuals with access and functional needs—should be identified in an improvement plan. Improvement plans should be dynamic documents with corrective actions continually monitored and implemented as part of improving preparedness through the exercise cycle.

The Homeland Security Exercise and Evaluation Program (HSEEP) provides a set of guiding principles for exercise programs, as well as a common approach to exercise program management, design and development, conduct, evaluation, and improvement planning. For additional information on HSEEP, refer to Homeland Security Exercise and Evaluation Program | FEMA.gov. In accordance with HSEEP guidance, subrecipients are reminded of the importance of implementing corrective actions iteratively throughout the progressive exercise cycle. This link provides access to a sample After Action Report (AAR)/Improvement Plan (IP) template: Improvement Planning – HSEEP Resources – Preparedness Toolkit (fema.gov). Recipients are encouraged to enter their exercise data and AAR/IP in the Preparedness Toolkit.

V. MAINTENANCE AND SUSTAINMENT

Maintenance and sustainment costs, such as maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable. For additional information, see the Preparedness Grants Manual.

VI. CONSTRUCTION AND RENOVATION

NSGP funding may not be used for construction and renovation projects without prior written approval from FEMA. 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 Preparedness Officer. All recipients of NSGP funds must request and receive prior approval from FEMA before any NSGP funds are used for any construction or renovation. Additionally, recipients are required to submit a SF-424C Budget and budget detail citing the project costs and an SF-424D Form for standard assurances for the construction project. The total cost of any construction or renovation paid for using NSGP funds may not exceed the greater amount of $1 million or 15% of the NSGP award.

VII. CONTRACTED SECURITY PERSONNEL

Contracted security personnel are allowed under this program only as described in this NOFO and must comply with guidance set forth in IB 421b and IB 441. NSGP funds may not be used to purchase equipment for contracted security.

e. ***Unallowable Costs***

The following projects and costs are considered **ineligible** for award consideration:

- Organization costs, and operational overtime costs;
- Hiring of public safety personnel;
- General-use expenditures;
- Overtime and backfill;
- Initiatives that do not address the implementation of programs/initiatives to build prevention and protection-focused capabilities directed at identified facilities and/or the surrounding communities;
- The development of risk/vulnerability assessment models;
- Initiatives that fund risk or vulnerability security assessments or the development of the IJ;
- Initiatives in which federal agencies are the beneficiary or that enhance federal property;
- Initiatives which study technology development;
- Proof-of-concept initiatives;
- Initiatives that duplicate capabilities being provided by the Federal Government;
- Organizational operating expenses;
- Reimbursement of pre-award security expenses (see Section D.12.b);
- Cameras for license plate readers/license plate reader software;
- Cameras for facial recognition software;
- Weapons or weapons-related training; and
- Knox boxes.