



Governor Katie Hobbs

# State of Arizona Department of Homeland Security



Director Kim O'Connor

## FFY 2025 USDHS/FEMA Nonprofit Security Grant Program Information Sheet

As appropriated by the *Full-Year Continuing Appropriations and Extensions Act, 2025* (Public Law No. 119-4, §1101); and authorized by Sections 2009 of the *Homeland Security Act of 2002*, (Public Law No. 107-296 as amended) (6 U.S.C. § 609a); the Federal Fiscal Year (FFY) 2025 Nonprofit Security Grant Program (NSGP) provides funding support for physical and cyber security enhancements and other security-related activities to nonprofit organizations that are at high risk of a terrorist or other extremist attack.

In FFY 2025, multiple funding allocations have been appropriated for nonprofit organizations located inside or outside of FFY 2025 Urban Area Security Initiative (UASI)-designated urban areas. As in previous fiscal years, the **Nonprofit Security Grant Program - Urban Area (NSGP-UA)** will be a competitive grant program that funds nonprofits located in UASI-designated urban areas. Under the **Nonprofit Security Grant Program - State (NSGP-S)**, each state will receive an allocation for nonprofit organizations located outside of FFY 2025 Urban Area Security Initiative (UASI)-designated urban areas.

### Priorities

The FFY 2025 NSGP provides funding support for physical security enhancements and other security activities to nonprofit organizations that are at high risk of a terrorist attack.

Given the evolving threat landscape, DHS/FEMA has evaluated the national risk profile and set priorities that help ensure appropriate allocation of scarce security dollars. In assessing the national risk profile for FFY 2025, one area warrants the most concern under the Nonprofit Security Grant Program:

- 1) Enhancing the protection of soft targets/crowded places;

Likewise, there are several enduring security needs that crosscut the homeland security enterprise. The following are second-tier priorities that help recipients implement a comprehensive approach to securing communities:

- 1) Effective planning;
- 2) Training and awareness campaigns; and
- 3) Equipment
- 4) Exercises

## Application Information

**October 15, 2025, 5:00 p.m. – Deadline for submitting** to [hs@azdohs.gov](mailto:hs@azdohs.gov) no later than **5:00 p.m.**

1. **Investment Justification (IJ) Application**
2. **Arizona NSGP Supplement Forms, and**
3. **Vulnerability Risk Assessment**

Information and application forms are available at <https://azdohs.gov/usdhs-fema-nsgp>. No other forms of application will be accepted. ***An application must be submitted by a current employee, personnel, official, staff or leadership that is duly authorized to apply for an award on behalf of the nonprofit organization at the time application. Consultants or contractors of the subrecipient are not permitted to be the authorized organization representative.***

Eligible nonprofit organizations may apply for an award amount:

- Up to \$200,000 for the NSGP-UA per site
- Up to \$200,000 for the NSGP-S per site

**Nonprofit organizations with one site may apply for up to \$200,000 for that site. Sub-applicants 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 per funding stream. 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.**

- Only nonprofit organizations as described under section 501(c)(3) of the Internal Revenue Code of 1986 (IRC), exempt from tax under section 501(a) of such code may apply.
- Applicant must provide a Unique Entity Identifier (UEI) Number. **If applicant has applied but not yet received a UEI from SAM.gov, you may still submit application. However, if a nonprofit organization does not have a valid UEI number by the time the State Administrative Agency is ready to make a subaward, then the State Administrative Agency is not permitted to issue the subaward.**
- Eligible nonprofit organizations **must submit a copy of their organization's Vulnerability Assessment (on which the application is based) with their application.**
- **Arizona NSGP Supplement Forms document: Complete information on all 7 tabs.**
- Please note that should a nonprofit organization receive an award, an Environmental Planning and Historic Preservation (EHP) compliance review may be required prior to beginning any project. It is suggested that you reflect an EHP application submission/review in the Investment Justification application, Section V Milestones.

## Tips for Completing the NSGP Investment Justification Application

- **Review the evaluation and scoring criteria** on pages 51 – 57 of the FFY 2025 NSGP Guidance (Notice of Funding Opportunity-NOFO).
- **Investment Justification Application (Template)** – The IJ Application PDF template is the **ONLY** form that will be accepted. Submissions in any other format are unacceptable and will not be scored. **Please note the naming convention to be used when submitting the Investment Justification.**
- **Investment Justification Application, Part V – Milestones:** Milestones should be within the period starting **11/1/25** and ending **12/31/26**.
- **Save the file** using the following naming convention:
  - For **NSGP-UA**
    - FY2025\_NSQP-UA\_AZ\_Phoenix\_<Nonprofit Name>
  - For **NSGP-S**
    - FY2025\_NSQP-S\_AZ\_<Nonprofit Name>

## Eligible Applicants

### CRITERIA

An eligible nonprofit organization must:

- Meet the description under section 501(c)(3) of the Internal Revenue Code of 1986 (IRC) and exempt from tax under section 501(a) of such code;

- **For NSGP-UA**, be located within the FFY 2025 UASI-designated Phoenix urban area; **OR for NSGP-S**, be located outside of the FFY 2025 UASI-designated Phoenix urban area;
- Be able to demonstrate, through the application, that the organization is at high risk of a terrorist attack.

## Scope of Eligible Projects

The following information outlines general allowable and unallowable NSGP costs guidance.

### Allowable Costs

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

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

#### Equipment

Allowable costs are focused on target 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 attack. This equipment **is limited to select items** on the Authorized Equipment List (AEL).

Per the 2025 FEMA NSGP Notice of Funding Opportunity (Page 43 - 46), equipment **is limited to select items on the Authorized Equipment List**.

All other allowable cost items (**training, contract security, planning, exercise, M&A**) are at the **bottom of the drop-down menu** under **AEL NUMBER & TITLE – EQUIPMENT, PROJECT, OR ACTIVITY**.

The allowable prevention and protection categories and equipment standards for the NSGP are listed on DHS AEL located on the DHS/FEMA site at <http://www.fema.gov/authorized-equipment-list>. 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 for more information). In addition, 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 <https://www.cisa.gov/safecom/funding>.

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.

#### Training

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

- 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.

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 including programs 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 II. 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 II.***

### **Exercise**

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 <https://www.fema.gov/emergency-managers/national-preparedness/exercises/hseep>. 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 AAR/IP template: <https://preptoolkit.fema.gov/web/hseep-resources/improvement-planning>. Recipients are encouraged to enter their exercise data and AAR/IP in the Preparedness Toolkit at <https://preptoolkit.fema.gov/web/hseep-resources>.

### **Contracted Security**

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](#). Contracted security costs described in the Investment Justification should include the hourly/daily rate, the number of personnel, and the anticipated number of hours/days the personnel will work over the course of the period of performance. NSGP funds may not be used to purchase equipment for contracted security.

**Management and Administration (M&A) – Please contact AZDOHS Finance Staff for further clarification on allowable expenses at [hs@azdohs.gov](mailto:hs@azdohs.gov).**

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 are not operational costs, they are the necessary costs incurred in direct support of the grant or as a consequence of the grant and should be allocated across the entire lifecycle of the grant. 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.**

M&A costs include the following categories of activities:

- Hiring of full-time or part-time staff or contractors/consultants responsible for activities relating to the management and administration of NSGP funds
- Meeting-related expenses directly related to M&A of NSGP funds

### **Indirect Costs**

Indirect costs are allowable under this program as described in 2 C.F.R. § 200.414. With the exception of recipients who have never received a negotiated indirect cost rate as described in 2 C.F.R. § 200.414(f), recipients must have an approved indirect cost rate agreement with their cognizant Federal agency to charge indirect costs to this award. A copy of the approved rate (a fully executed, agreement negotiated with the applicant's cognizant Federal agency) is required at the time of application, and must be provided to DHS/FEMA before indirect costs are charged to the award.

### **Maintenance and Sustainment**

The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable. Preparedness grant funds may be used to purchase maintenance contracts or agreements, warranty coverage, licenses and user fees. For additional information, see the Preparedness Grants Manual.

### **Construction and Renovation**

NSGP funding may not be used for construction and renovation projects without prior written approval from DHS/FEMA. All recipients of NSGP funds must request and receive approval from DHS/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. The total cost of any construction or renovation paid for using NSGP funds may not exceed the greater amount of \$1,000,000 or 15 percent (15%) of the NSGP award.

### **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
- Cameras for license plate readers/license plate reader software
- Cameras for facial recognition software
- Weapons or weapons-related training
- Knox boxes