



Preparedness Grants Manual

FM-207-23-001

April 2024



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FEMA

April 12, 2024

MEMORANDUM FOR RECORD

FROM: Pamela S. Williams *P.S. Williams*
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Grant Programs Directorate

SUBJECT: Preparedness Grants Manual, April 2024

The Grant Programs Directorate's Office of Grants Administration (OGA) has developed FEMA Manual 207-23-001, *Preparedness Grants Manual*, April 2024. FEMA has developed the Preparedness Grants Manual (PGM) to guide preparedness grant recipients, including subrecipients, on how to manage their grants. The preparedness grant programs covered in the PGM include the following:

- Homeland Security Grant Program (comprising the State Homeland Security Grant Program, the Urban Area Security Initiative, and Operation Stongarden);
- Tribal Homeland Security Grant Program;
- Nonprofit Security Grant Program;
- Transit Security Grant Program;
- Intercity Passenger Rail Program;
- Intercity Bus Security Grant Program;
- Port Security Grant Program; and
- Emergency Management Performance Grant Program.

Recipients seeking guidance on policies and procedures for managing the aforementioned FEMA preparedness grants should reference this manual for further information. Chapters 8-12 of the PGM contain program-specific information and requirements, while the main content of the PGM (chapters 1-7) contains important information relevant to all preparedness grant programs unless otherwise noted.

The PGM has been updated pursuant to FEMA Directive 112-12 v2, *Development and Management of FEMA Policy* (October 28, 2019), and in collaboration with the Regional Grants Management Divisions, the OGA program areas and their Department of Homeland Security counterparts (e.g., the U.S. Coast Guard, the Transportation Security Administration, and the Cybersecurity and Infrastructure Security Agency), the Office of External Affairs (including Tribal Affairs), the Office of Chief Counsel, the Office of Environmental and Historic Preservation, the Office of Resilience Strategy, the Office of Equal Rights, the Office of Disability Integration and Coordination, the Office of Policy and Program Analysis, and other financial assistance support offices.

The PGM April 2024 update associated with this memorandum supersedes the previously published version of the PGM issued on February 27, 2023, for Fiscal Year 2024 and into the future, and is effective as of the date of this memorandum. An explanation of specific updates to the PGM can be found in Section 1.3, *Key Changes*, after the Table of Contents.

Please contact the GPD Office of Enterprise Grants Services Policy Division at fema-gpd-policy@fema.dhs.gov if you have any questions regarding FEMA Manual 207-23-001, *Preparedness Grants Manual*, April 2024.

9. Nonprofit Security Grant Program

9.1. Program Funding Guidelines and Priorities

NSGP grant recipients (e.g., SAAs) and subrecipients (e.g., nonprofit organizations) may only use NSGP grant funds for the purpose set forth in the grant award and must use funding in a way that is consistent with the statutory authority for the award. See the annual NSGP NOFO for program Priorities.

9.1.1. NATIONAL INCIDENT MANAGEMENT SYSTEM IMPLEMENTATION

Recipients receiving NSGP funding must implement NIMS. Recipients must manage resources purchased or supported with FEMA grant funding according to NIMS resource management guidance.

9.2. Nonprofit Security Grant Program Investment Modifications – Changes in Scope or Objective

Changes in scope or objective of the award—whether as a result of intended actions by the recipient or subrecipients—require FEMA’s prior written approval, in accordance with 2 C.F.R. § 200.308(c)(1), § 200.407. NSGP is competitive with applications recommended for funding based on threat, vulnerability, consequence, and their mitigation to a specific facility/location. However, consistent with 2 C.F.R § 200.308(c)(1), Change in Scope Notification, FEMA requires prior written approval of any change in scope/objective of the grant-funded activity after the award is issued. See 2 C.F.R. § 200.308(b), (c). Scope/objective changes will be considered on a case-by-case basis, provided the change does not negatively impact the competitive process used to recommend NSGP awards. Requests to change the scope or objective of the grant-funded activity after the award is made must be submitted by the SAA via FEMA GO as a Scope Change Amendment. The amendment request must include the following:

- A written request from the NSGP subrecipient on its letterhead, outlining the scope or objective change including the approved projects from the subrecipient’s IJ, the funds and relative scope or objective significance allocated to those projects, the proposed changes, and any resulting reallocations as a result of the change of scope or objective;
- An explanation why the change of scope or objective is necessary;
- Validation from the SAA that any deviations from the approved IJ are addressed in the vulnerability assessment submitted by the subrecipient at the time of application; and
- The subrecipient request must also address whether the proposed changes will impact its ability to complete the project within the award’s POP.

FEMA will generally not approve NSGP change-of-scope requests resulting from the following situations:

- Subrecipients that relocate their facilities after submitting their application who are requesting a change of scope to allow them to use NSGP funds toward projects at the new facility; or

- Subrecipients that renovate their facilities after submitting their application in cases where the subsequent renovations would affect the vulnerability/risk assessment upon which the IJ is based.

NSGP project funding is based on the ability of the proposed project to mitigate the risk factors identified in the IJ. For this reason, FEMA may reject requests to significantly change the physical security enhancements that are purchased with NSGP funding where FEMA believes approval of the request would change or exceed the scope of the originally approved project. FEMA will consider all requests to deviate from the security project as originally proposed on a case-by-case basis, *consistent with 2 C.F.R. § 200.308(c)(1)*.

Subrecipients may not proceed with implementing any scope/objective changes until the SAA receives written approval from FEMA through FEMA GO and until the SAA has made any required subaward modifications.

If a subrecipient is simply making changes to its own budget without impacting the scope or objective of the subaward, and where the budget changes do not involve other prior approval requirements listed in 2 C.F.R. § 200.407, then the subrecipient does not need the prior approval of the SAA or FEMA. See 2 C.F.R. § 200.308. Instead, the subrecipient is only required to report to the SAA the budget changes. Similarly, the SAA should report those budget changes to FEMA.

9.3. Pass-Through Requirements

Pass-through funding is required under this program. Awards made to the SAA for the NSGP carry additional pass-through requirements. Pass-through is defined as an obligation on the part of the state to make subawards to selected nonprofit organizations. The SAA must provide funds awarded under NSGP to subrecipients within 45 days of receipt of the funds. A letter of intent (or equivalent) to distribute funds is not sufficient. Award subrecipients that are selected for funding under this program must be provided with funding within 45 days from the date the funds are first made available to the recipient so that they can initiate implementation of approved investments.

For the SAA to successfully meet the pass-through requirement and provide funding to the subrecipients, the SAA must meet the following four requirements:

- There must be some action by the SAA to establish a firm commitment to award the funds to the selected nonprofit organization;
- The action must be unconditional on the part of the SAA (i.e., no contingencies for availability of SAA funds);
- There must be documentary evidence of the commitment of the award of funding to the selected nonprofit organization; and
- The SAA must communicate the terms of the subaward to the selected nonprofit organization.

If a nonprofit organization is selected for an NSGP award and elects to decline the award, the SAA must notify their FEMA Preparedness Officer. The SAA may not re-obligate to another subrecipient without prior approval. "Receipt of the funds" occurs either when the SAA accepts the award or 15 calendar days after the SAA receives notice of the award, whichever is earlier. SAAs are sent notification of NSGP awards via the FEMA GO system. If an SAA accepts its award within 15 calendar days of receiving notice of the award in the FEMA GO system, the 45-calendar day pass-through period will start on the date the SAA accepted the award. Should an SAA not accept the NSGP award

within 15 calendar days of receiving notice of the award in the FEMA GO system, the 45-calendar days pass-through period will begin 15 calendar days after the award notification is sent to the SAA via the FEMA GO system.

It is important to note that the POP start date does not directly affect the start of the 45-calendar day pass-through period. For example, an SAA may receive notice of the NSGP award on Aug. 20, 2023, while the POP dates for that award are Sept. 1, 2023, through Aug. 31, 2026. In this example, the 45-day pass-through period will begin on the date the SAA accepts the NSGP award or Sept. 4, 2023 (15 calendar days after the SAA was notified of the award), whichever date occurs first. The POP start date of Sept. 1, 2023, would not affect the timing of meeting the 45-calendar day pass-through requirement.