

Nonprofit Security Grant - State Program

FY 2025 State Guidance

Guidance Released: January 22, 2025

Updated September 4, 2026



**MONTANA
DISASTER AND EMERGENCY SERVICES
1956 Mt. Majo Street
P.O. BOX 4789
FORT HARRISON, MT 59636
Montana Disaster and Emergency Services**

Administered By

Montana Disaster and Emergency Services (MT DES) is the State Administrative Authority (SAA) for the Nonprofit Security Grant – State (NPSG-S)

Catalog of Federal Domestic Assistance (CFDA)

CFDA Title: Nonprofit Security Grant Program (NPSG)

CFDA Number: 97.008

Notice of Funding Opportunity Number

DHS-25-GPD-008-00-99

Applications

Applications may be obtained at <https://des.mt.gov/Grant-Programs/Nonprofit-Security-Grant-Program-NSGP>

Application period: September 8, 2025 – October 15, 2025, at 11:55pm.

Period of Performance:

1 October 2025 – June 30, 2028

NOTE: The FY25 NSGP NOFO was published on August 13, 2025 at <https://www.fema.gov/fact-sheet/departments-homeland-security-dhs-nsgp-notice-funding-opportunity-nofo-fiscal-year-2025>.

TABLE OF CONTENTS

1.0	Nonprofit Security Grant Program.....	4
1.1	Overview.....	4
1.2	Objectives	4
1.3	Priorities	4
2.0	Eligibility Criteria	4
2.1	Requirements for Personnel, Partners, and Other Parties	5
3.0	Cost Share	5
4.0	NSGP Application	5
4.1	NSGP Investment Justification (IJ)	5
	(PDF FY25 IJ Template is available on the MT DES webpage).....	5
4.2	Vulnerability/Risk Assessment.....	6
4.3	Mission Statement.....	6
5.0	Application Process	6
5.1	Unique Entity Identifier (UEI).....	7
5.2	Applicant Agent or Authorized Representative	7
6.0	Evaluation Process	7
7.0	Funding Restrictions	7
8.0	Environmental and Historic Preservation (EHP) Compliance.....	7
9.0	Build America, Buy America Act (BABAA)	8
10.0	Procurement	8
11.0	Funding Guidelines	9
11.1	Allowable Costs	9
11.2	Unallowable Costs	10
12.0	Subrecipient Award	11
13.0	Performance Progress Reports	11
14.0	Reimbursement Process	11
15.0	Monitoring/Technical Assistance	12
16.0	Project Closeout.....	13
17.0	MT DES Contact Information	13

1.0 Nonprofit Security Grant Program

1.1 Overview

The Nonprofit Security Grant Program-State (NSGP) seeks to integrate the preparedness activities of nonprofit organizations that are at high risk of a terrorist attack with broader state and local preparedness efforts.

Sub-applicants with one site may apply for a maximum of up to \$200,000 for that one site. Sub-applicants with multiple sites may apply for up to \$200,000 per site, for no more than three sites, for a maximum of \$600,000 per applicant. Each site *must* have its own Investment Justification (IJ) and vulnerability/risk assessment for and unique to each site.

1.2 Objectives

The NSGP, via State Administrative Agencies (SAA), provides funds to nonprofit organizations that are at high risk of terrorist or other extremist attack to meet the following three objectives throughout the period of performance:

- 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 organization 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.

1.3 Priorities

Given the evolving threat landscape, it is incumbent upon DHS/FEMA to continuously evaluate the national risk profile and set priorities that help ensure appropriate allocation of scarce security dollars. The FY 2025 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.

2.0 Eligibility Criteria

Eligible nonprofit organizations are those organizations that are:

1. Described under section 501(c)(3) of the Internal Revenue Code of 1986 (IRC) and exempt from tax under section 501(a) of such code.

Note: 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 501(c)(3) of the IRC. Such organizations are automatically exempt if they meet the requirements of section 501(c)(3).

2. Able to demonstrate, through the application, that the organization is at high risk of a terrorist or other extremist attack.

Examples of eligible sub-applicant organizations can include houses of worship, museums, educational facilities, senior centers, community centers, and day camps, among many others.

New Restriction: Applicants with previously awarded NSGP projects that are in open status and are not closed at the time of the application are **not eligible** to apply under FY 2025 NSGP.

2.1 Requirements for Personnel, Partners, and Other Parties

Sub-applicants should not have foreign nationals or noncitizens included. If a sub-applicant has foreign nationals, they must be properly vetted and must adhere to all government statutes, polices, and procedures including “staff American, stay in America” and security requirements. Sub-applicants/subrecipients must submit short bios and resumes. This should include the type of entity, organizational leadership, and board members along with the both the names and addresses of the individuals. Resumes are subject to approval. See pg. 7 of the FY25 NSGP NOFO.

3.0 Cost Share

There is NO cost share requirement for this grant.

4.0 NSGP Application

Eligible nonprofit sub-applicants must submit the following three documents to MT DES through the EUNA Grants, the grant management system:

4.1 NSGP Investment Justification (IJ)

(PDF FY25 IJ Template is available on the [MT DES webpage](#))

Each sub-applicant **must** develop a formal IJ using the FY25 template that addresses each investment proposed for funding. Security enhancements must be for the locations that the nonprofit occupies at the time of application. Applicants must submit in EUNA Grants the most current version of the IJ form as provided by FEMA. The investments or projects described in the IJ must:

- Be for the location(s) that the nonprofit occupies at the time of the application.
- Address an identified risk, including threat and vulnerability, and build or sustain a core capability identified in the National Preparedness Goal for that site, regardless of whether it is submitting for similar projects at multiple sites.
- Demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA.
- Be both feasible and effective at reducing the risks for which the project was designed.
- Be able to be fully completed within the three-year period of performance.

- Be consistent with all applicable requirements outlined in the NOFO.
- Identify with one of the four categories of: Ideology-based/Spiritual/Religious, Educational, Medical, or Other.

4.2 Vulnerability/Risk Assessment

Each sub-applicant must include its [vulnerability/risk assessment](#) unique to the project site identified in the application. A vulnerability assessment is used to identify and validate physical security deficiencies of your organization/facility and is the foundation of an NSGP application. Vulnerability assessments can be provided in the form of a Cybersecurity and Infrastructure Security Agency (CISA) Self-Assessment ([Facility Security Self-Assessment | CISA \[cisa.gov\]](#)), a state or local law enforcement assessment, an outside contractor's assessment, or other valid method of assessment.

4.3 Mission Statement

Each sub-applicant **must** include its Mission Statement and any policies or practices that may elevate the organization's risk. MT DES will use the Mission Statement along with information provided in the application to validate the organization type. The organization purpose, as described in the Mission Statement, will be used to validate the organization type identified in the IJ as one of the following:

1. Ideology-based/Spiritual/Religious
2. Educational
3. Medical
4. Other

5.0 Application Process

Eligible nonprofit applicants will complete and submit the FY 2025 NSGP application to MT DES through the [EUNA Grants](#).

The following are required documents that must be submitted with the EUNA Grants application:

1. **Mission statement** for the nonprofit organization.
2. **Vulnerability assessment** specific to the location/facility being applied for.
3. **FY25 Investment Justification (IJ)** which includes sections on the nonprofit organization's risks, vulnerabilities, and the proposed projects that are intended to address or mitigate the identified risks and vulnerabilities. Proposed projects must be for the locations that the nonprofit occupies at the time of application.

5.1 Unique Entity Identifier (UEI)

The federal government now requires the Unique Entity Identifier (UEI) numbers that are created in [SAM.gov](https://sam.gov). This number is required to apply for NSGP. Jurisdictions that do not have a UEI may retrieve it through [SAM.gov](https://sam.gov).

5.2 Applicant Agent or Authorized Representative

The applicant agent or authorized representative is the individual who is authorized to make legally binding commitments for the applicant organization.

6.0 Evaluation Process

FY2025 NSGP applications will be evaluated by MT DES staff through a review process to determine the application completeness and eligibility based on adherence to state and federal program guidance. MT DES utilizes scoring criteria established by FEMA when reviewing and ranking submitted applications. The project applications will be reviewed for project relevance to the mission areas outlined in the Notice of Funding Opportunity (NOFO).

Ranked applications will be included in the State of Montana NSGP application to FEMA; Final awards are determined by FEMA. Applications that meet all the elements listed in the NOFO are not guaranteed funding.

7.0 Funding Restrictions

Federal funds made available through this award may only be used for the purpose set forth in the Notice of Funding Opportunity (NOFO) and must be consistent with the statutory authority for the award. Award funds may not be used for matching funds for any other Federal award, 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.

8.0 Environmental and Historic Preservation (EHP) Compliance

Subrecipients proposing projects that have the potential to impact the environment, including but not limited to construction, modification, renovation of existing buildings, structures, and facilities must participate in the DHS/FEMA EHP review process. This includes any changes to the structure such as adding security cameras, security doors, security glass, etc. Projects selected for award will work with MT DES to submit project information for EHP review. All relevant sections of the FEMA EHP form must be submitted to MT DES along with all other pertinent project information within 90 days of the period of performance start date. Failure to provide requisite information could result in delays in the release of grant funds. MT DES will work with Grant Programs Directorate for EHP approval.

9.0 Build America, Buy America Act (BABAA)

All awarded sub-recipients 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. This requires that any funds used for a project for infrastructure utilizing iron and steel, manufactured products, and construction materials should be produced in the United States. This 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 it 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 more information or to see if a project is considered an infrastructure program, please see: [Programs and Definitions: Build America, Buy America Act | FEMA.gov](#)

10.0 Procurement

All FEMA awards are subject to the federal procurement standards under the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* found at [2 C.F.R. § 200.317-200.327](#). Applicants selected for funding does not constitute award. Any costs incurred or obligated prior to the execution of an award are not allowed.

When purchasing under a FEMA award, a **non-state entity** must have and use documented procurement procedures, consistent with state, local, and Tribal laws and regulations and conforming to applicable federal law and the procurement standards identified in [2 C.F.R. § 200.317-200.327](#). For a **non-state entity**, where a difference exists between a federal procurement standard and a state, local, and/or Tribal procurement standard or regulation, the **non-state entity** must apply the most restrictive standard.

MT DES may request a copy of an entity's own documented procurement procedures which reflect applicable state and local laws and regulations. Procurement procedures must conform to applicable Federal law and the standards identified in [2 C.F.R. § 200.318](#)

More information on Federal Procurement standards can be found in [2 C.F.R. Part 200](#)

For more information on MT Procurement laws, rules, policies, and executive orders please visit [State Procurement Bureau](#).

11.0 Funding Guidelines

The following information outlines general allowable and unallowable NSGP costs (see the full NOFO for more detail).

11.1 Allowable Costs

11.1.1 Planning

Funding may be used for security or emergency planning expenses and 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 individuals with access and functional needs as well as those with limited English proficiency.

Examples of allowable planning activities:

- Development and enhancement of security plans and protocols
- Development of further strengthening of security assessments
- Emergency contingency plans
- Evacuation/shelter-in-place plans

11.1.2 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 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). See Appendix A, Section C of the FY25 NOFO for the limited list of items.

11.1.3 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.

11.1.4 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.

11.1.5 Training

Nonprofit organization staff may use NSGP funds to attend security-related training courses and programs within the United States. 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/or travel expenses are **not allowable costs**. Allowable training topics are limited to the protection of critical infrastructure key resources, including physical and cybersecurity, target hardening, and terrorism awareness/employee training, Active Shooter training, and emergency first aid training.

11.1.6 Contracted Security

Contracted security personnel are allowed under this program, but the nonprofit organization must be able to sustain this capability in future years without NSGP funding. A sustainment plan will be required as part of the closeout package for any award funding this capability. Contracted security costs described in the application should include the hourly/daily rate, the number of personnel, and 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.

If the estimated contract security personnel costs at the time of application exceed 50 percent of a nonprofit organization's total funding amount, the application must include a waiver request. FEMA will review contracted security costs prior to award and, if approved, will waive the 50 percent personnel cap as a term and condition of the award. [FEMA IB 421b. Clarification on the Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008 \(Public Law 110-412 - the PRICE Act\)](#)

11.2 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 program/initiatives to build prevention and protection-focused capabilities directed at identified facilities and/or the surrounding community
- The development of risk/vulnerability assessment models
- Initiatives that fund risk or vulnerability security assessments or the development of the application
- Initiatives in which Federal agencies are the beneficiary or that enhance Federal property
- Initiatives which study technology development
- Proof-of-concept initiatives; and
- Direct or indirect pass-through of benefits to non-eligible entities.

Prohibition on Telecommunication, Video Surveillance Equipment and Services

Subrecipients may not use any FEMA funds to procure or obtain China made or China affiliated telecommunication, video surveillance equipment or services. Reference [FEMA policy #405-143-1 Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services](#).

Please reference the System for Award Management (SAM) for a consolidated exclusion list of subsidiaries of telecommunication companies <https://sam.gov/SAM/>. Please contact your MT DES grant coordinator to determine if equipment or services is eligible under this program.

12.0 Subrecipient Award

Applicants that are awarded NSGP funds will be notified by MT DES. Funds will remain on hold until the subrecipient formally accepts the award within 45 days of notification. All successful applicants are required to comply with DHS Standard Terms and Conditions, as part of the award agreement. Subrecipients must report on progress towards implementing projects described in their applications on a quarterly basis.

13.0 Performance Progress Reports

Performance progress reports are required to be completed and submitted in EUNA Grants by the 10th day following the end of each quarter.

- January 10th
- April 10th
- July 10th
- October 10th

14.0 Reimbursement Process

The NSGP grant is a reimbursement-based model: funding is provided to grant recipients **after** expenses have been incurred. To receive reimbursement, payment requests must be submitted through EUNA Grants. MT DES will provide sub-recipients with information regarding the payment request process following the award of funding. Payment requests must include the following supporting documentation:

- Invoices/purchase orders outlining costs for any equipment/materials purchased
- Proof of payment as identified in a general ledger/financial report
- If a credit card is used for a purchase, a credit card statement showing proof of payment is needed
- Additional requirements listed in the FY25 NSGP NOFO: see NOFO pg. 40

- The name, mission statement, and purpose of each subrecipient receiving funds, along with the amount allocated and the specific role or activity being reimbursed.
- Whether the subrecipient's work or mission involves supporting aliens, regardless of whether FEMA funds support such activities.
- Whether the payment request includes an activity involving support to aliens.
- Whether the subrecipient has any DEI practices.

MT DES will process payment requests within 30 days of receiving the payment request in EUNA Grants.

If the organization does not currently have a vendor ID with the State of Montana, one may be requested.

To request a vendor ID through MT DES, the organization must fill out [IRS Form W-9](#). The Federal Employer Identification Number (FEIN) is needed when filling out IRS Form **W-9**. To establish electronic funds transfer for reimbursement, [State of Montana Form 204](#) must be filled out and returned to MT DES. Following award of federal funds, MT DES can provide these forms to the sub-recipient.

Changes to the period of performance are **not accepted**. Scope of work changes and budget amendments require FEMA approval. Subrecipients will need to contact their grant coordinator as soon as possible if any amendments are being requested.

15.0 Monitoring/Technical Assistance

Sub-recipients will be monitored by MT DES staff, both programmatically and financially, to ensure that the project goals, objectives, performance requirements, timelines, milestone completion, budgets, and other related program criteria are being met.

Technical Assistance will be accomplished through desk-based reviews of financial reimbursement requests and project status reports. In addition, on-site technical assistance visits will be performed according to MT DES schedules, as requested, or as needed. Technical Assistance will involve the review of the financial, programmatic, performance, compliance, administrative processes, policies, activities, and other attributes of each Federal assistance award and will identify areas where further assistance, corrective actions or other support may be needed.

16.0 Project Closeout

Closeout of Nonprofit Security Grant Program projects will be administered by MT DES upon determination of grant completion in accordance with 2 C.F.R. § 200.344 and upon receipt of a signed sub-recipient letter requesting closeout. MT DES will complete a project and file review prior to closing out a project and provide the subrecipient with a closeout confirmation letter for the grant files.

17.0 MT DES Contact Information

MT DES will provide programmatic support and technical assistance for the NSGP Grant, please contact a MT DES Preparedness Grant Coordinator:

Pam Fruh | Preparedness Program Manager
pam.fruh@mt.gov

Crystal Guerrero | Preparedness Grant Coordinator
crystal.guerrero@mt.gov

Genny Lighthiser | Preparedness Grant Coordinator
genevieve.lighthiser@mt.gov

Emily Schuff | Preparedness Grant Coordinator
emily.schuff@mt.gov