




**Grant Programs Directorate Information Bulletin
No. 441**

June 6, 2019

MEMORANDUM FOR: All State Administrative Agency Heads
All State Agency Points of Contact
All Urban Areas Security Initiative Points of Contact
All State Homeland Security Directors
All State Emergency Management Agency Directors

FROM: Bridget Bean 
Acting Assistant Administrator
Grant Programs Directorate

SUBJECT: **Allowability to Reprogram Nonprofit Security Grant Program
Funding to Contracted Security Personnel**

I. Purpose

The purpose of this Information Bulletin (IB) is to provide increased flexibility in the use of grant funds by Nonprofit Organizations, herein referred to as subrecipients, that have received Nonprofit Security Grant Program (NSGP) funding, starting with funding provided in Fiscal Year (FY) 2017 and going forward. Specifically, these subrecipients may reprogram remaining FY 2017, FY 2018, FY 2019, or future NSGP funding to support contracted security personnel (costs to purchase equipment for contracted security is not allowable). The request for reprogramming must be submitted to the State Administrative Agency (SAA) for review, approval, and submission to the Federal Emergency Management Agency (FEMA) for final consideration.

In light of recent violent incidents that have taken place at houses of worship, and more generally, the continuing threat to soft targets both domestically and abroad, FEMA expanded NSGP cost allowability for FY 2019 and future FY funding to include contracted security personnel. In an effort to provide houses of worship and other nonprofit organizations with additional flexibility to address their ongoing security vulnerabilities, FEMA is also extending the allowability for contracted security personnel to FY 2017 and FY 2018 NSGP subrecipients.

II. Applicability

This reprogramming flexibility is limited to unspent funding under FY 2017, FY 2018, FY 2019, or future NSGP subawards. Further, subrecipients may not reprogram Federal funds to

reimburse costs that have already been obligated or incurred for contracted security personnel prior to FEMA's official approval of the reprogramming request.

III. Guidance

To reprogram funding, subrecipients must submit an Investment Modification to the SAA for review, approval, and submission to FEMA.¹ Instructions on Investment Modifications are available in the applicable FY's NSGP Notice of Funding Opportunity (NOFO) for FY 2017 and FY 2018 or the Preparedness Grants Manual (PGM) for FY 2019 and future NSGP funding.

In addition to the requirements outlined in the NOFO or PGM, the Investment Modification request must explain the status of any previously approved or ongoing NSGP-funded projects, to include:

- A brief description of the project(s).
- How much NSGP funding has been obligated toward each project.
- The impact that the reprogramming may have on project completion.
- The financial impact (cost), as well as the impact on the nonprofit organization's security (benefit), that will result from the reprogramming of funds.

FEMA will consider all the above information in determining whether to approve the reprogramming request. Reprogramming requests are more likely to be approved if they demonstrate that contracted security personnel will contribute to the subrecipient's long-term security even after the grant award ends.

If a request is approved, it will be included as part of the overall NSGP award's revised award terms and conditions.

Further, FEMA notes that contracted personnel funding is subject to the requirements of section 2008 of the *Homeland Security Act of 2002* (Pub. L. No. 107-296), as amended by the *Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008* (PRICE Act) (Pub. L. No. 110-412). FEMA will review reprogramming requests for consistency with applicable laws, regulations, and policies, including the PRICE Act. See IB 421A for instructions on requesting a waiver where personnel costs would exceed 50 percent of the total budget.

For additional resources, see the Department of Homeland Security's (DHS) [Securing Soft Targets and Crowded Places](#) site and the DHS Center for Faith and Opportunity Initiatives' [Resources to Protect Your House of Worship](#) site.

¹ Recipients are reminded that only one amendment can be submitted in the Non-Disaster Grants (ND Grants) system at any given time, and therefore, if multiple nonprofits are requesting reprogramming, the SAA should consolidate the requests into a single amendment request.

IV. Questions

Questions regarding this IB may be directed to your assigned FEMA program analyst or the Centralized Scheduling and Information Desk (CSID) at askcsid@fema.dhs.gov or (800) 368-6498, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

V. Review Date

This IB will be reviewed within five years from date of issuance.