

**NONPROFIT SECURITY GRANT PROGRAM  
INVESTMENT JUSTIFICATION**

As part of the Nonprofit Security Grant Program (NSGP) application, eligible 501(c)(3) organizations must develop a formal Investment Justification (IJ) that addresses each initiative proposed for funding. These IJs must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities. Additionally, the IJ must demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by the Federal Emergency Management Agency (FEMA). Nonprofit subapplicants must ensure that the IJ is consistent with all applicable requirements outlined below. Each IJ must be for one facility/location.

FEMA has developed guidelines that establish the required IJ content and helps ensure that submissions are organized in a consistent manner while addressing key data requirements. This form (Office of Management and Budget [OMB] Number 1660-011/ FEMA Form Number FF-207-FY-21-115) may be used by nonprofit subapplicants to complete and submit their IJ. Failure to address these data elements in the prescribed format could potentially result in the rejection of the IJ from review consideration.

Nonprofit subapplicants must use the following naming convention when submitting required documents for the NSGP-UA: "FY2024\_NS GP\_UA\_<State Abbreviation>\_<Urban Area>\_<Nonprofit Name>"; and NSGP-S: "FY2024\_NS GP\_S\_<State Abbreviation>\_<Nonprofit Name>".

Applications should be submitted by the nonprofit organization to the State Administrative Agency (SAA) as a completed fillable Adobe file. Scanned copies will not be accepted. Nonprofit subapplicants should contact their respective SAA to get information on the application deadline and other SAA requirements. If an extension to the deadline is required, nonprofit organizations must consult with their respective SAA.

**PAPERWORK REDUCTION ACT STATEMENT**

Public reporting burden for this form is estimated to average 84 hours per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and submitting the form. This collection of information is required to obtain or retain benefits. You are not required to respond to this collection of information unless a valid OMB control number is displayed in the upper right corner of this form. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing the burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 500 C Street, SW., Washington, DC 20472-3100, Paperwork Reduction Project (1660-0110) NOTE: Do not send your completed form to this address.

**PRIVACY ACT STATEMENT**

**AUTHORITY:** The Homeland Security Act of 2002, as amended by Title I of the Implementing Recommendations of the 9/11 Commission Act of 2007, 6 U.S.C. §§ 605 and 606.

**PRINCIPAL PURPOSE(S):** This information is being collected for the primary purpose of facilitating correspondence between the grant applicant and the Department of Homeland Security and for determining eligibility and administration of FEMA Preparedness Grant Programs, specifically, the Nonprofit Security Grant Program.

**ROUTINE USE(S):** The information on this form may be disclosed as generally permitted under 5 U.S.C. § 552a(b) of the Privacy Act of 1974, as amended. This includes using this information as necessary and authorized by the routine uses published in DHS/ FEMA – 004 Grants Management Information Files System of Records, 74 FR 39,705 (August 7, 2009), and upon written request, by agreement, or as required by law.

**DISCLOSURE:** The disclosure of information on this form is voluntary; however, failure to provide the information requested may delay or prevent the organization from receiving grant funding.

**PART I. NONPROFIT ORGANIZATION SUBAPPLICANT INFORMATION**

Identify the following:

LEGAL NAME OF THE ORGANIZATION

[REDACTED]

Please list the physical address of the facility.

STREET

[REDACTED]

One investment justification per facility.

CITY

[REDACTED]

STATE

OH

ZIP CODE

[REDACTED]

COUNTY

[REDACTED]

Is the building owned, or are you leasing/renting?

Own

If leasing or renting, do you have the owner's permission to make the proposed security enhancements?  Yes  No

At the time of application, is the organization actively occupying and functioning out of the location listed above?  Yes  No

Are you the only nonprofit operating in/from this facility/building?  Yes  No

**Note:** Only one nonprofit can apply per building/facility/physical structure/address. However, the request and subsequent security enhancements may benefit nonprofits who cohabitate/operate in/from the same location. Multiple requests for federal assistance from the same physical address/building/facility/structure will all be deemed ineligible.

If “No,” please explain how the proposed security enhancements benefit both you and the other organization(s).

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Based on your mission statement, please summarize your organization's mission, ideology, and/or beliefs.  
 [REDACTED] ministers to all people through hospitality, prayer, formation, and service. Eucharist centered and led by the Holy Spirit we strive to be grateful stewards of all God's gifts.

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What is the primary organization type? Ideology-based/Spiritual/Religious  
 If “Other,” please describe the type of organization.  
 Not applicable

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Please select the function that best describes the organization: House of Worship  
 Please select the organization's primary affiliation: Christian

**Note:** Please select the main religious affiliation that describes your organization. If the organization is a denomination of an affiliation, please select the corresponding affiliation from the drop down menu instead of "Other." If your organization has NO religious affiliation, please select "None/Unaffiliated." There is NO scoring preference given to certain affiliations or lack thereof.

If “Other,” please describe affiliation.  
 Not applicable

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Eligible organizations are registered 501(c)(3) nonprofits or otherwise are organizations as described under 501(c)(3) of the Internal Revenue Code (IRC) and tax-exempt under section 501(a) of the IRC. More information on tax-exempt organizations can be found at: <https://www.irs.gov/charities-non-profits/charitable-organizations>.

Is the organization eligible under the IRC to receive NSGP funds?  Yes  No

Does the organization have a Unique Entity ID ( UEI ) Number?  Yes  No

If “Yes,” please enter the UEI Number for the organization: [REDACTED]  
 Nonprofits do not need to have a valid UEI at the time of application; however, subrecipients must have a valid UEI in order to receive a subaward.

Are you physically located in a current Urban Area Security Initiative designated urban area?  Yes  No

If “Yes,” select the designated urban area from the list:

Total federal funding requested under the NSGP (will automatically populate based on entries in Section IV-B): \$150,000

**PART II. BACKGROUND INFORMATION (5 POSSIBLE POINTS OUT OF 40)**

Please describe (if applicable) this location's symbolic value as a highly recognized national or historic institution/landmark that renders the site as a possible target of terrorism or other extremist attack.

The Church is one of the largest parishes within the Archdiocese of Cincinnati and represents the Catholic faith as a local institution within ██████ County. Its building boasts a beautiful facade and interior which serves as a representation of those who practice the Catholic faith and follow the teachings of Jesus Christ. The sanctuary is home to stained glass windows and exquisitely crafted woodwork which, if damaged or destroyed, are priceless to the parish.

Please select (if applicable) the current, ongoing, or recent (last 3 years) event(s) in which your organization has been involved in prevention, protection, response, and/or recovery:

Other

*Please describe the organization's role in prevention, protection, response, and/or recovery, specifically highlighting the efforts that demonstrate integration of nonprofit preparedness with broader state and local preparedness efforts.*

The Church has made a concerted effort to establish a Security Program by devoting time, resources and concentrations focused on the ongoing security increases. They have contracted ██████ to assist in this endeavor for guidance and support and is now requesting this funding to ensure that resource allocation is not an obstacle moving forward.

**PART III. RISK (15 POSSIBLE POINTS OUT OF 40)**

Department of Homeland Security defines risk as the product of three principal variables: Threat, Vulnerability, and Consequence. In the space below, describe the risk(s) faced by your organization specifically in terms of the A) Threats, B) Vulnerabilities, and C) Potential Consequences of an attack.

A) Threat: In considering a threat, please describe the identification and substantiation of specific threats or attacks against the nonprofit organization or a closely related organization, network, or cell.  
*Description can include findings from a threat or risk assessment, police report(s), and/or insurance claims specific to the location being applied for including dates of specific threats.*

From a local perspective, the Church is located in ██████ Township within ██████ County and offers access to individuals and families in need through a variety of programs. The Outreach Commission strives to inspire the parish community to perform and spread works of charity and justice within and beyond the parish boundaries, in a spirit of respect for the dignity of all people. As a result of the foregoing, fostering good will towards all people the Church and by approximation the neighborhood is susceptible to an extremist attack against the Church, which represents a symbol of Christian prosperity which is under siege today in our present culture.

From a nationwide perspective, Houses of Worship face an ongoing and increased threat from terrorists and extremist attacks based on the current economic and political climates. According to the Department of Homeland Security, "Foreign adversaries, including terrorist organizations and nation state adversaries, also remain intent on exploiting the threat environment to promote or inspire violence, sow discord, or undermine U.S. democratic institutions. DHS continues to assess that the primary threat of mass casualty violence in the United States stems from lone offenders and small groups motivated by a range of ideological beliefs and/or personal grievances." Additionally, the FBI reports that, "Threats to members of faith-based communities across the United States, houses or worship and schools have been rising in recent months as evidenced by the rise of anti-Semitism on college campuses and throughout our country happening today.

B) Vulnerabilities: Please describe the organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist or other extremist attack.

████████ currently has a variety of vulnerabilities across all 6 areas of evaluation in the Vulnerability Assessment ("SVA") completed March 15, 2024. Seven (7) priorities were identified as part of the SVA as follows:

1. Replace Door Handles on Double Doors
2. Make Enhancements to Video Surveillance System
3. Protect Large Glass Areas on Windows & Doors from Intrusion
4. Increase Law Enforcement Linking Technology Capabilities
5. Protect the Facility from Vehicular Assaults on Entrances/Exits
6. Limit Physical Access Points during Mass
7. Build an Infrastructure to support a Security Program

If granted funding under this grant award program, ██████ will seek to remediate as many vulnerabilities as possible, prioritizing the door handles, video surveillance system upgrades and protecting large glass areas first and foremost.

C) Potential Consequences: Please describe the potential negative effects on the organization's assets, systems, and/or function if damaged, destroyed, or disrupted by a terrorist or other extremist attack.

The negative effects of a terrorist or extremist attack at the Church would be devastating to the local community.

Church serves as a backbone to the County Community. The Church hosts many beloved events and traditions that bring the community together celebrating both joy and sadness by offering faith and guidance to any persons wishing to devote themselves to the teachings of the Catholic Church. From the annual Parish Festival to the Friday Lenten Fish Frys to sporting events to Euchre Tournaments and Social Gatherings, the Church offers a comprehensive community to parishioners and families alike. The families at are more than just parishioners, they are part of the Family and bring the community together in ways that generations have counted on for many years and hope to continue for many to come.

Additionally, the Church provides resources and support to local residents and prides itself on the closeness of this small community. Some of the residents rely on the Church for food assistance, clothing and more.

is a small, tightly knit community, with many families residing in the community for generations. A traumatic safety event, especially one that may involve casualties, would have a lasting detrimental impact. Due to limited mental health support services in the immediate area, individuals subject to a traumatic event where availability becomes stressed or unavailable to those in need predisposes them to a life of substance abuse and/or higher rate of suicide increases dramatically.

It is vitally important that the Church be protected to deter any acts of violence at the hands of extremists who may wish to undermine the religious practices of local Christians and specifically Catholics.

#### PART IV. FACILITY HARDENING (9 POSSIBLE POINTS OUT OF 40)

**Section IV-A: In this section, describe each proposed activity or investment (as selected in Section IV-B), identify the vulnerability that it addresses, and detail the cost associated with the activity or investment. For each activity/investment, include the quantity, estimated hourly rate or estimated price per unit, and proposed usage.**

**Note: This section should include narrative information about all costs listed in Section IV-B. The objective is for the information contained in this section to allow reviewers to validate the need of all costs in Section IV-B.**

Allowable costs include facility hardening activities, such as planning and exercise related costs, contracted security personnel, and security-related training courses and programs limited to the protection of critical infrastructure key resources. Funding can also be used for the acquisition and installation of security equipment on real property (including buildings and surrounding property) owned or leased by the nonprofit organization, specifically in prevention of and/or in protection against the risk of terrorist or other extremist attack.

Video Surveillance: Upgrades to its Video Surveillance, adding additional camera points and upgrading to include better quality images and video storage.

Bollards: To protect entryways from vehicular intrusion or assault.

Safety Film: Safety film cost is estimated at \$25 per square foot (including supplies, labor for installation and liners) and with the requested \$25,000, 1,000 square feet of glass could be strategically placed at the most vulnerable glass areas of the facility.

Exterior and Interior Doors: \$15,000 to replace or remediate security vulnerabilities of its interior and exterior doors.

Training: Costs related to attendance fees for training and related expenses, such as materials, supplies, and/or equipment.

M&A Fees: To aide in the effective implementation of the safety remediation projects, the Church has contracted to assist with the project management once a potential grant award is received. will invoice the Church for all post award time.

Planning: Costs related to (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 (iv) Other project planning activities with prior approval from FEMA.

Exercises: Costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, and documentation.

**Section IV-B: In this section, list all proposed facility hardening equipment, projects, or activities as allowable per the Authorized Equipment List (AEL), NSGP Notice of Funding Opportunity (NOFO), and Preparedness Grants Manual (PGM). Select the AEL number and title, list the vulnerability the equipment/project/activity addresses, and enter the estimated funding requested (round up to the nearest dollar).**

<b>AEL NUMBER &amp; TITLE – EQUIPMENT, PROJECT, OR ACTIVITY</b>	<b>VULNERABILITY TO BE ADDRESSED</b>	<b>ESTIMATED FUNDING REQUESTED (Round to nearest dollar)</b>
14SW-01-VIDA: Systems, Video Assessment, Security	Video Surveillance Cameras and Software Fees	\$50,000
14SW-01-WALL: Barriers: Fences; Jersey Walls	Bollards	\$13,000
14EX-00-BSIR: Systems, Building, Blast/Shock/Impact Resistant	Safety Film for Select Areas	\$25,000
14SW-01-DOOR: Doors and Gates, Impact Resistant	Exterior and Interior Doors	\$15,000
06CP-01-PORT: Radio, Portable	Portable Radios for Staff	\$2,000
21GN-00-TRNG: Training and Awareness	On-site Safety Training(s) for organization's employees	\$5,000
M&A: Management and Administration (M&A)	Post award PM Fees incurred by ██████ for remediation projects	\$7,500
13IT-00-ALRT: System, Alert/Notification	MARCS radios and panic alarms	\$25,000
PLANNING: Planning	Planning	\$5,000
EXERCISE: Exercise	Exercise	\$2,500
	<b>Total Funding Requested:</b>	\$150,000

**PART V. MILESTONE (5 POSSIBLE POINTS OUT OF 40)**

**Provide descriptions and associated key activities that lead to the milestone event over the NSGP period of performance.**

Start dates should reflect the start of the associated key activities and end dates should reflect when the milestone event will occur. Milestones should reflect considerations to Environmental Planning and Historic Preservation reviews when applicable.  
(10 milestones maximum)

<b>KEY ACTIVITIES &amp; CORRESPONDING MILESTONES</b>	<b>START DATE</b>	<b>COMPLETION DATE</b>
Environmental Planning and Historical Preservation review.	10/01/2024	03/01/2025
Grant Research, Vulnerability Assessment, Document Gathering and Application Process	03/01/2024	05/21/2024
Grant Award, Federal Procurement Guidelines & Grant Administration Research	10/01/2024	12/31/2024
Project Plan(s) and Development of RFP(s)	01/01/2025	03/01/2025
Vendor Quotes & Vendor Selection	03/01/2025	04/30/2025
Finance Council & Archdiocese Approval (All Projects)	05/01/2025	05/31/2025
Project Administration (All Projects)	06/01/2025	12/31/2026
Ongoing Grant Management, Administration & Reporting Requirements	10/01/2024	12/31/2026

**PART VI. PROJECT MANAGEMENT (2 POSSIBLE POINTS OUT OF 40)**

Who will manage the project? *Include the name, phone number, email address, and experience of the project manager(s).*

This project will be managed by [REDACTED] on behalf of St. Max Church as part of the ongoing efforts to remediate the known vulnerabilities of the Church. [REDACTED] is owned and operated by Lindsay Marlar, a local consultant specializing in physical and cyber security with a background in Criminal Justice from Xavier University. [REDACTED] can be reached by phone at [REDACTED], by email at [REDACTED].com or more information can be read on the company's website [REDACTED]. [REDACTED] team will offer a multi disciplinary approach with experts in the areas of Law Enforcement, Construction and Facilities Management, Federal Compliance, Network Security, Project Management, Process Excellence, Best Practices Implementation and Change Management.

Please assess your project management plan/approach. Assessment could include challenges to the effective implementation of this project and the coordination of the project with state and local homeland security partners.

[REDACTED] has completed an extensive evaluation on behalf of the church, evaluating the policies/procedures, physical structures and their vulnerabilities, staff temperament, and local challenges associated with protecting the school and its students from terrorists and extremist attacks. [REDACTED] is prepared to assist the Church with a multi-faceted approach to foster an attitude of ongoing improvements and remediations including identifying future grants, working directly with the parish staff and various committees to raise additional capital for future projects, working with local law enforcement and [REDACTED] County Emergency Management Agency, and liaising with the staff to increase training, confidence and ability to meaningfully increase their security posture over time. The current administration, with the assistance of [REDACTED], has committed to making safety and security of parishioners their top priority in the immediate future.

**PART VII. IMPACT (4 POSSIBLE POINTS OUT OF 40)**

Please describe the measurable outputs and outcomes that will indicate that this investment is successful at the end of the period of performance.

The Church, with the assistance of [REDACTED], will be able to commit to making the time and investments necessary to carry out the projects for the requested funds. Detailed project plans will be prepared and submitted to the Archbishop for approval at which time vendors will be selected for each project (in compliance with the Federal Procurement Guidelines). The Church will keep all detailed records required and be prepared to submit them as part of the Grant Administration and Reporting requirements. All funds will be encumbered and administered by their respective deadlines and projects will be completed prior to the Period of Performance. The Church has made significant headway in these projects by preemptively consulting with [REDACTED] as well as various vendors which aided in the application process and will thereby benefit the post award project administration. All activities will be documented and provided as necessary and/or upon request. Based on the requested funds and their purposes, the Church anticipates completing the following projects:

- Video Surveillance Upgrades.
- Technology Equipment Purchases and Implementation including MARCS Radios, Panic Alarms and portable radios.
- Bollards.
- Door Replacement or Remediation (Interior and Exterior)
- Safety Film Installation.
- Infrastructure Development including Grant Management & Administration, Planning and Exercise Costs.

**FUNDING HISTORY**

**If the nonprofit organization has received NSGP funding in the past, provide the funding amount, funding year, and the investment type.**

Has the organization received federal NSGP funding in the past?  Yes  No

*NOTE: Please only include federal NSGP funding. If the organization has received state-funded NSGP awards, or any other federal awards, please do NOT include those here.*

Please select the MOST RECENT fiscal year in which the nonprofit received federal NSGP funding:

*If "Yes," please list the year(s), amount(s), and Project(s)/Investment(s). (Example: FY20 / \$150K / CCD Camera System and Lighting.)*

**NONPROFIT SUBAPPLICANT CONTACT INFORMATION**

This application was written by: Contractor/grant-writer on behalf of the nonprofit

By clicking this box, I certify that I am an employee or affiliated volunteer on behalf of the nonprofit organization or have been hired by the nonprofit organization to apply on their behalf for the Nonprofit Security Grant Program.

FULL NAME

[REDACTED]

POSITION/TITLE

[REDACTED]

EMAIL

[REDACTED]

WORK PHONE

[REDACTED]