DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency

NONPROFIT SECURITY GRANT PROGRAM
INVESTMENT JUSTIFICATION

OMB Control No.: 1660-0156
Expiration Date: 08-31-2023

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 [OMB] Number: 1660-011/FEMA Form Number: 089-25) 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: "FY2023_NSGP_UA_<State Abbreviation>_<Urban Area>_<Nonprofit Name>; and NSGP-S: "FY2023_NSGP_S_<StateAbbreviation>_<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.

PART I. NONPROFIT ORGANIZATION SUBAPPLICANT INFORMATION

Identify the following:

LEGAL NAME OF THE ORGANIZATION

██████████████

Please list the physical address of the facility.	STREET			
	████████████			
One investment justification per facility.	CITY	STATE	ZIP CODE	COUNTY
	██████	OH	████	████

Is the building owned, or are you leasing/renting?	*If leasing or renting, do you have the owner's permission to make the proposed security enhancements?*	☐ Yes ☐ No
Own		

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).

Based on your mission statement, please summarize your organization's mission, ideology, and/or beliefs.

Mission:As a private Pre-K to 8th Catholic school, our mission is provide a quality religious and academic education.

Belief Statements: Commitment to Christian service, Emphasis on development of the whole person, Attention to the needs of the individual, Openness to diversity, Academic excellence in all areas, Recognition of each person's dignity and gifts, and Strong sense of Catholic spirit.

What is the primary organization type?   Educational

If "Other," please describe the type of organization.
Not Applicable.

Please select the function that best describes the organization: Elementary School

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.

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: ██████████

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.

████████ Elementary is the primary school for the ████████ ████████████ Parish, comprised of ████████ ██████ ██████ and ████████ which is part of the South East Region of Cincinnati Archdiocese, Section 5. Because of this association with multiple parishes in the local community as well as the association to the Archdiocese of Cincinnati (located in a high risk urban area), ██████ symbolic value as a prominent institution of the Catholic Church is great.

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:

Man-made disaster (non-terrorist)

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.

██████ School has been working closely with the ████████████ Emergency Management Agency to establish a presence in the local community and join in the collective effort to aide the local EMA with safety and public service to carry out the responsibility of protecting lives, property and the environment through recovery, response, mitigation and preparedness by committing to an ongoing effort to increase the safety of its students and the community at large for disaster readiness.

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 School is located in ████████ which is a largely rural community located in ████████ County (just outside of Cincinnati). The median income in ████████ is significantly below that of the Cincinnati areas and there are many families that participate in subsidized housing and other public assistance programs. ████████ offers limited access to food necessities and is considered a "grocery desert", further limiting residents quality of life. Additionally, local residents have limited transportation and therefore limited access to health resources including mental health and substance abuse resources. As a result of the foregoing, the residents in the areas immediately surrounding the school are ripe with discontent and susceptible to an extremist attack against the School, which represents a symbol of Christian prosperity that they may not feel priivy to.

From a nation wide 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 undermain 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 years, as evidenced by the hostage-taking at Congregation Beth Israel, a synagogue in Colleyville, Texas, and the bomb threats against Historically Black Colleges and Universities (HBCU) that continue today. Just as recently as March 27, 2023, Audrey Hale, a former student of The Covenant School (part of the Covenant Presbyterian Church), specifically targeted the elementary based on a resentment of the school's faith and religious beliefs.

B) Vulnerabilities: Please describe the organization's susceptibility to destruction, incapacitation, or exploitation by a terrorist or other extremist attack.
The School currently faces a variety of vulnerabilities to the safety of its students and staff on a daily basis:

Structural Issues: The School was built in an era when the type of architecture needed to accommodate today's safety standards was not yet contemplated. Because of this, without modifications and capital investments, the school's physical building will not be able to remediate the vulnerabilities identified in the assessment completed by local law enforcement, such as exterior doors equipped with keyless entry, interior doors meeting the proper safety standards, a visitor vestibule, fortified glass windows. Notwithstanding the architectural defects, the amount of investments needed to bring in other possible remedies is not possible without additional funding from outside revenue sources, such as fencing for the perimeter, bollards, safety film, exterior lighting, etc.

Security Staff: The School is currently currently vulnerable due to its lack of security staff, a dedicated Security Control Room and/or the policies, procedures and recurring security activities needed to comply with the PASS Tier 1 Guidance.
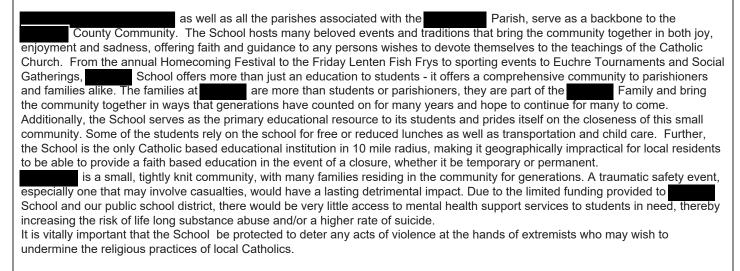
Staff Training: The School wishes to increase its staff awareness, training and confidence in order to properly respond to a terrorist and/or extremist attack

Technologies: The School is currently vulnerable by virtue of poor video surveillance, lack of intrusion detection, the absence of MARCS Radios, Updated Public Address System, upgrades and improvements to the telephone systems, and/or a Silent Panic Alarm, all of which are needed in the event of a terrorist or extremist attack to communicate with and aide in the investigation of with local law enforcement. The School is also vulnerable by virtue of a lack of cybersecurity awareness and training as well as deficiencies with the the technologies that could aide in the improvement of their ability to share information with other local agencies, license plate and/or facial recognition software to alert authorities to suspicious or undesirable persons on the School's campus.

In summation, the School has a variety of vulnerabilities and would remediate them with additional funding.

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 School would be devastating to the local community.

███████████████ as well as all the parishes associated with the ████████ Parish, serve as a backbone to the ██████ County Community. The School hosts many beloved events and traditions that bring the community together in both joy, enjoyment and sadness, offering faith and guidance to any persons wishes to devote themselves to the teachings of the Catholic Church. From the annual Homecoming Festival to the Friday Lenten Fish Frys to sporting events to Euchre Tournaments and Social Gatherings, ██████ School offers more than just an education to students - it offers a comprehensive community to parishioners and families alike. The families at ██████ are more than students or 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 School serves as the primary educational resource to its students and prides itself on the closeness of this small community. Some of the students rely on the school for free or reduced lunches as well as transportation and child care. Further, the School is the only Catholic based educational institution in 10 mile radius, making it geographically impractical for local residents to be able to provide a faith based education in the event of a closure, whether it be temporary or permanent.

██████ 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 the limited funding provided to ██████ School and our public school district, there would be very little access to mental health support services to students in need, thereby increasing the risk of life long substance abuse and/or a higher rate of suicide.

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

The School would like to upgrade its Video Surveillance, adding additional camera points and upgrading to include better quality images and video storage. This will allow for more adequate real time monitoring as well as aide in the investigation of potential incidents. The School would like to add Intrusion Detection system. This will detect access violations or intrusions and allow for local law enforcements' immediate notification and response in the event of a terrorist or extremist attack. The School would like to upgrade its Intercom/PA System to allow for adequate communication in the event of an emergency caused by a terrorist or extremist attack. The estimated cost for a unified solution for these three objectives is estimated at $90,421.00.

The School would like to install Safety Film for Exterior Doors and Windows to prevent unauthorized entry through glass portions of the building exterior to reduce the likelihood of an assailant gaining unauthorized entry to the building. Safety film is estimated at $25 per foot (film, application and all labor) and a total of 982 feet is estimated to adequately protect the most vulnerable positions in the building for a total cost of $24,577.

The School would like to update/replace Interior Doors for Elementary Hallway to reinforce the physical structures and add additional technologies that would allow for centralized locking mechanisms in the event of a terrorist or extremist attack. This is currently estimated at $22,500.00

Training: The School would like to have onsite training(s) for school staff to increase their safety awareness and preparedness in the event of a terrorist or extremist attack.

M&A Fees: M&A Fees: To aide in the effective implementation of the safety remediation projects, the School has contracted ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮ to assist with the project management once a potential grant award is received. ▮▮ will invoice the School for all post award time. All time will be reviewed by the School administration and included in any reporting required as part of the Subaward Terms & Conditions.

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).

AEL NUMBER & TITLE – EQUIPMENT, PROJECT, OR ACTIVITY	VULNERABILITY TO BE ADDRESSED	ESTIMATED FUNDING REQUESTED (Round to nearest dollar)
14SW-01-VIDA: Systems, Video Assessment, Security	Video Surveillance Cameras and Software Fees	$33,935
14SW-01-ALRM: Systems/Sensors, Alarm	Intrusion Detection and Software Fees	$15,094
14EX-00-BSIR: Systems, Building, Blast/Shock/Impact Resistant	Safety Film	$24,577
14SW-01-DOOR: Doors and Gates, Impact Resistant	Interior Doors for the classroom hallway	$22,500
03OE-03-MEGA: System, Public Address, Handheld or Mobile	Intercom/PA System	$41,394
21GN-00-TRNG: Training and Awareness	On-site Safety Training(s) for organization's employees	$5,000
M&A: Management and Administration (M&A)	PM Fees incurred by ▮▮ for remediation projects	$7,500
	Total Funding Requested:	$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)

KEY ACTIVITIES & CORRESPONDING MILESTONES	START DATE	COMPLETION DATE
Environmental Planning and Historical Preservation review.	03/01/2023	12/31/2023
Grant Research, Vulnerability Assessment, Document Gathering and Application Process	03/01/2023	04/13/2023
Grant Award, Federal Procurement Guidelines & Grant Administration Research	08/01/2023	09/01/2023
Vendor Quotes & Project Plan - Technology (Video Surveillance, Intrusion Detection, Intercom)	09/01/2023	11/01/2023
Vendor Quotes & Project Plan - Interior Doors	09/01/2023	11/01/2023
Vendor Quotes & Project Plan - Training	09/01/2023	11/01/2023
Vendor Selection, Finance Council & Archdiocese Approval (All Projects)	11/01/2023	12/31/2023
Project Administration (All Projects)	01/01/2024	08/31/2025
Ongoing Grant Management, Administration & Reporting Requirements	08/01/2023	08/31/2025

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 ███████████████████████████ , on behalf of ██████ School as part of the ongoing efforts to remediate the known vulnerabilities of the School. ████ is owned and operated by ██████████ a local consultant specializing in physical and cyber security with a background in Criminal Justice from Xavier University. She can be reached by phone at ██ ███████ by email at ████████████████ or more information can be read on the company's website ████████████████████████ . ████ 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.

████ has completed an extensive evaluation on behalf of the school, 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. ████ is prepared to assist the School with a multi-faceted approach to foster an attitude of ongoing improvements and remediations including identifying future grants, working directly with the school administration to raise additional capital for future projects, working with local law enforcement and ████████ 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 ████ has committed to making safety and security of students 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 School, with the assistance of ████ 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 School 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 School has made significant headway in these projects by preemptively consulting with ████ 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 School anticipates completing the following projects:
1. Unified Solution for Video Surveillance, Intrusion Detection & Intercom/PA System;
2. Interior Doors (Classroom hallway);
3. Safety Film for Exterior Doors and Windows; and
4. Training.

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: Consultant on behalf of the nonprofit organization (at no-cost)

☒   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	POSITION/TITLE
███████████	Owner

EMAIL	WORK PHONE
███████████	███████████