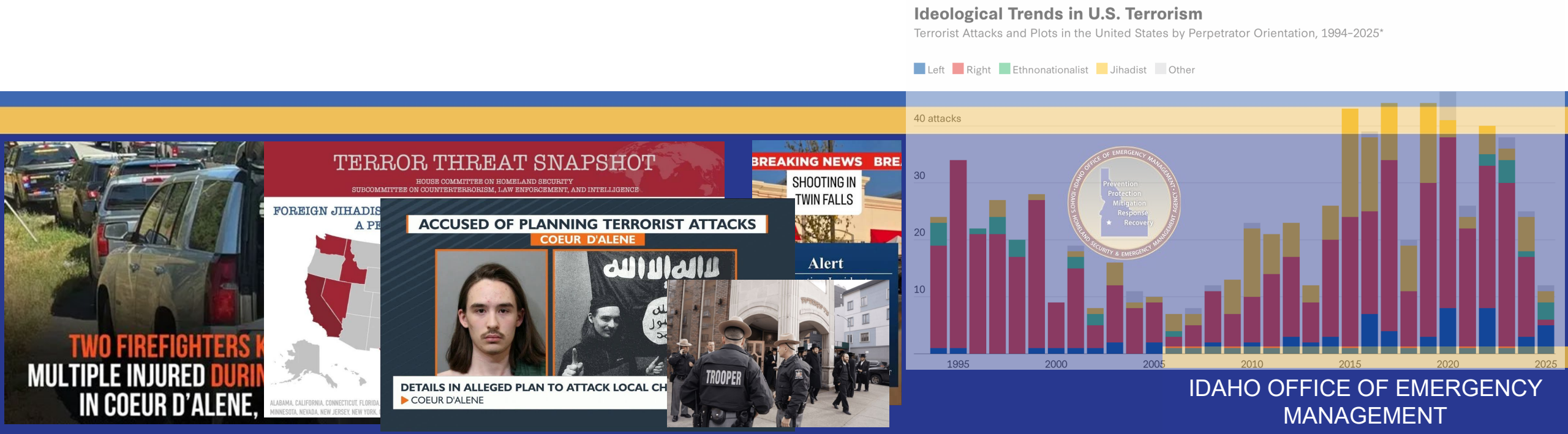
2026 DHS FEMA Nonprofit Security Grant Program (NSGP) Subrecipient Kickoff



Implementing Your Award Successfully

- Congratulations on your FY2026 NSGP award
- Focus: implementation, compliance, reimbursement, and closeout
- Objective: successfully complete your approved projects

Agenda

- Award startup
- Approved project mgmt.
- Procurement
- Reimbursement readiness
- Advance payments
- Reporting
- EHP and BABAA
- Foreign National Vetting
- Monitoring and closeout
- Resources and contacts

Before You Spend Any Funds

Required before project activities begin:

✓ Countersigned GAN

✓ Active SAM registration

✓ PaymentWorks registration

✓ EUNA access

✓ EHP approval (when applicable)

Managing the Approved Project and Budget

FEMA approved:

- A specific project
- A specific budget
- A specific scope of work

Not every future security improvement.

Project Changes Require Approval

✅ Contact IOEM before changing scope

Example / reason:

- ❌ Fence becomes gate (BABAA-wood becomes iron/steel)
- ❌ Different camera system (AEL & prohibited manufacturers)
- ❌ Additional quantities (Budget neutral changes generally okay)
- ❌ New project activity (FEMA must approve new SOW)

Procurement Compliance

Follow:

- 2 CFR Part 200; FEMA FY26 grants manual & NSGP NOFO;
- Organizational procurement policies
- FEMA requirements

FEMA approval does not replace procurement requirements.

Procurement Documentation

Maintain:

- Nexus to IJ
- Quotes / bids
- Sole source documentation
- Vendor selection records
- Contracts
- Purchase orders
- Invoices
- Proof of payment

The Documentation Chain

1. Approved Project (IJ nexus)
2. Procurement
3. Purchase
4. Receipt & (post-EHP if needed) Installation
5. Payment



- 6. Reimbursement
- 7. Monitoring
- 8. Closeout
- 9. (3-Year) Record retention

Reimbursement Readiness

Documentation package should include:

- ✓ Invoice
- ✓ Procurement file
- ✓ Proof of payment
- ✓ Delivery/installation records
- ✓ IJ line item
- ✓ Budget category

Advance Payments

- Available for immediate cash needs
- Not reimbursement approval
- Documentation still required
- Reconciliation still required
- Takes at least three weeks
- FEMA GO payment system has a planned upgrade so will be unavailable from Nov. 20 through Mid-Dec. The earliest possibility for 2026 NSGP advance payments is late January 2027.

Financial and Programmatic Reporting

Financial Reporting

- Quarterly
  - Due 15 days after quarter ends. Deadlines:
    - January 15, April 15,
    - July 15, October 15

Program Reporting

- Biannual
  - Due 15 days after biannual period ends. Deadlines:
    - January 15
    - July 15

EUNA: Grant → Custom → Quarterly Reports

EHP Requirements

Frequently applicable to:

- Cameras
- Doors
- Access Control

- Fencing
- Gates
- Bollards

Do not begin installation before approval.

BABAA Requirements

Potentially applicable to:

- Fencing
- Gates
- Bollards

- Impact-resistant doors
- Fixed improvements

Maintain product certifications and documentation.

Foreign National Vetting (IB 568A)

- Key Takeaway:
- IB 568A applies to NSGP
- Personnel-cost requirements generally do not affect NSGP subawards
- Do not submit I-9s or PII
- Retain records for monitoring or audit (e.g. contract security hires)

Monitoring, Records and Closeout

Monitoring may include:

- Desk reviews
- Site visits
- Technical assistance
- Reimbursement review

Closeout requires:

- Final reporting
- Complete documentation
- Record retention

Resources and Contacts

Resources:

- FY26 NSGP NOFO
- FY26 Preparedness Grants Manual
- EUNA User Guides
- FY26 NSGP Subrecipient Guidance
  - Reimbursement Checklist
  - BABAA Training Resources

Contacts:

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Questions & Discussion

2026 NSGP Subrecipient Thank you for participating

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