

DEPARTMENT OF HOMELAND SECURITY  
Federal Emergency Management Agency  
**APPENDIX E - TSGP INVESTMENT JUSTIFICATION**

OMB Control Number: 1660-0112  
Expiration: xx/xx/xxxx

**PAPERWORK BURDEN DISCLOSURE NOTICE**

Public reporting burden for this form is estimated to average 15 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, Paperwork Reduction Project (1660-0112). **NOTE: DO NOT SEND YOUR COMPLETED FORM TO THIS ADDRESS.**

**PRIVACY NOTICE**

The collection of this information is authorized by Section 1406, Title XIV of the Implementing Recommendations of the 9/11 Commission Act of 2007, 6 U.S.C. § 1135. This information is being collected for the primary purpose of facilitating correspondence between the grant applicant and the Department of Homeland Security to determine eligibility and administration of FEMA's Transit Security Grant Program (TSGP). 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.

**INVESTMENT JUSTIFICATION INSTRUCTIONS**

Please review the entire Notice of Funding Opportunity (NOFO) announcement before writing the Investment Justification (IJ). This is critical to ensuring accuracy, completion, and abating possible errors for program funding. As part of the TSGP application process, applicants must develop one formal IJ for each proposed project including funding and M&A costs. An agency may submit up to eight projects/ IJs per region. Agencies may also submit up to five additional projects/IJs for law enforcement providers dedicated to the transit organization. Each IJ must demonstrate how a proposed project addresses gaps and deficiencies in current programs and capabilities. The IJ must demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA. Applicants must ensure that the IJ is consistent with all applicable requirements outlined in this application kit.

**IJ Submission and File Naming Convention**

All application submissions in ND Grants must be electronic file attachments to the grant application. Applicants must use this file naming convention to identify their investment(s):

**DRAFT**  
UASI Area\_Applicant\_IJ Number  
Example: Chicago\_XYZTA\_IJ\_1

If submitting multiple encrypted documents, you must use the same password for all files.

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**Investment Heading**

Date	
Applicant	
Region and Urban Area(s) impacted	
Investment Name	
Investment Amount	
Investment Scalable (Yes/No)	

**I. Strategic and Program Priorities**

**I.A. Describe what the project is, how it will be executed, and its purpose.**

Response Type	Narrative
Response Instructions	<p>Describe what the project is, how it will be executed, and its purpose.</p> <ul style="list-style-type: none"> <li>• Define the vision, goals, and objectives for the risk reduction, and summarize how the proposed investment will fit into the overall effort to meet the critical infrastructure security priorities (including integration into existing security protocols);</li> <li>• Describe how the investment ties back to a recent vulnerability assessment, security plan, and/or real-world event;</li> <li>• Describe how the investment builds or sustains one or more core capabilities outlined in the National Preparedness Goal (the Goal) core capabilities;</li> <li>• Describe the specific needs and/or resource limitations that need to be addressed;</li> <li>• Identify any potential partners and their roles and staffing requirements, and provide information on any existing agreements such as Memoranda of Understanding (MOU);</li> <li>• Identify specific equipment needs (e.g., number of facility cameras, number of security lights, amount of security fencing, etc.) and other details for training, awareness, exercises, and other programs, if applicable (e.g., number of people to be trained, length of training, type of training, number of printed materials, number of agencies and staff members involved in exercise planning, execution, and review);</li> <li>• Describe progress made on the security project this investment will be completing, if applicable; and</li> <li>• Reference use of prior year grant fund, if applicable.</li> </ul> <p>• Capital Projects</p> <ul style="list-style-type: none"> <li>• If requesting consequence management, clearly detail the prevention and protection measures already in place, or funded to be completed;</li> </ul> <p>• Operational Projects</p> <ul style="list-style-type: none"> <li>• If requesting funding for both new OPacks and sustainment of existing OPacks describe which is the higher priority for the agency and why.</li> </ul> <p style="text-align: center;"><b>Expansion/New Teams (whole numbers only):</b></p> <ul style="list-style-type: none"> <li>• Total number of new Team/Patrols requested _____</li> <li>• Total number of law enforcement officers (LEOs) for each new Team/Patrol _____</li> <li>• Total number of new LEOs to be hired _____</li> </ul> <p style="text-align: center;"><b>Sustainment (whole numbers only):</b></p> <ul style="list-style-type: none"> <li>• Total number of new Team/Patrols requested _____</li> <li>• Total number of new LEOs to be hired _____</li> </ul>

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Response: Additional space is provided at the end of this form.

**I.B. Describe how this investment specifically addresses one or more of the funding priorities identified in the current year grant NOFO.**

Response Type	Narrative
Response Instructions	<ul style="list-style-type: none"><li>• Describe how the investment addresses one of the Funding Priority Areas outlined in this NOFO.</li></ul> <p><i>Note: For a project claimed as scalable clearly identify to what degree, and justify how partial funding will support proportional levels of success. Due to program funding limitations and priorities, if a project is identified as non-scalable and is at the funding cut-off line it may not be funded.</i></p>

Response: Additional space is provided at the end of this form.

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**II. Impact**

**II.A. Discuss how the implementation of this investment will decrease or mitigate risk. Describe how the project offers the highest risk reduction potential at the least cost. Include output and outcome metrics.**

Response Type	Narrative
Response Instructions	<ul style="list-style-type: none"><li>• Discuss how this investment will reduce risk (e.g., reduce vulnerabilities identified in a vulnerability assessment/ security plan, or mitigate the consequences of a real-world event) in a cost effective manner;</li><li>• Identify the nature of the risk and how the risk and need are related to show how addressing the through this investment will also mitigate risk (e.g., reduce vulnerabilities or mitigate the consequences of an event);</li><li>• Outline the expected, high-level impacts this investment is expected to attain or achieve if implemented, and potential negative impacts if the investment is not implemented.</li></ul>

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### III. Funding & Implementation Plan

#### III.A. Investment Funding Plan.

Response Type	Numeric and Narrative
Response Instructions	<ul style="list-style-type: none"> <li>• Complete the chart below to identify the amount of funding the recipient is requesting for this investment only;</li> <li>• Funds should be requested and detailed by allowable cost categories (i.e., planning, organization, equipment, training, exercises, and management and administration);</li> <li>• Applicants must make funding requests that are reasonable and justified by direct linkages to activities outlined in this particular investment; and</li> <li>• Applicants must indicate whether additional funding (non-Federal grants) will be leveraged for this investment.</li> </ul> <p><i>Note: Investments will be evaluated on the expected impact on security relative to the amount of the investment (i.e., cost effectiveness). An itemized Budget Detail Worksheet and Budget Narrative must also be completed for this investment.</i></p>

Response: Additional space is provided at the end of this form.

The following template illustrates how recipients should indicate the amount of TSGP funding required for the investment, how these funds will be allocated across the cost elements, and what (if any) non-TSGP funds will be utilized:

	Federal Request Total	Other Funding Sources Applied	Grand Total
Planning			
Equipment			
Training			
Exercises			
Operational Packages			
M&A			
Total			

#### III.B. Discuss the implementation and sustainment of this investment.

Response Type	Narrative
Response Instructions	<ul style="list-style-type: none"> <li>• Give the expected total life-span for this investment if fully implemented and sustained through completion;</li> <li>• Investments will be evaluated on the extent to which they exhibit a likelihood of success, or continued success, without requiring additional Federal assistance; and</li> <li>• For all new and sustainment OPack requests a five-year Security Capital and Operational Sustainment Plan is required with application submission.             <ul style="list-style-type: none"> <li>• A five-year Security Capital and Operational Sustainment Plan is attached to this application: <input type="checkbox"/> YES <input type="checkbox"/> NO</li> </ul> </li> </ul>

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Response: Additional space is provided at the end of this form

### III.C. Financial Need.

Response Type	Narrative
Response Instructions	<ul style="list-style-type: none"><li>• Describe the financial need and how it is consistent with the intent of the TSGP Program;</li><li>• Include details describing the applicant's financial situation, summarizing budget constraints, unsuccessful attempts to secure other funding, and any other resource impacts to the applicant that affect it from receiving security funds from other sources.</li><li>• Discuss other funding sources (e.g., non-Federal grant programs, public or private agreements, future fiscal year grants) that the applicant currently or plans on utilizing for the implementation and/or continued sustainment of this investment;<ul style="list-style-type: none"><li>• Identify any additional outside funds considered/used for this project request, including but not limited to<ul style="list-style-type: none"><li>• Federal Transit Administration's Urbanized Area Formula Grants (Section 5307);</li><li>• Homeland Security Grant Program (HSGP);</li><li>• State and local bonds;</li><li>• Private/public agreements or programs;</li><li>• Funds raised on own.</li></ul></li></ul></li><li>• If no other funding resources have been identified, or if none are necessary, provide rationale as to why the requested TSGP funding is sufficient for the implementation and sustainment of this investment.</li></ul>

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### III.D. Provide a high-level time-line, milestones and dates, for the implementation of this investment. Up to 10 milestones may be provided.

Response Type	Narrative
Response Instructions	<ul style="list-style-type: none"><li>• Only include major milestones that are critical to the success of the investment;</li><li>• While up to 10 milestones may be provided, the applicant should only list as many milestones as necessary;</li><li>• Milestones are for this discrete investment – those that are covered by the requested TSGP funds and will be completed over the grant period;</li><li>• Milestones should be kept to high-level, major tasks that will need to occur;</li><li>• Identify the planned start date associated with the identified milestone. The start date should reflect the date at which the earliest action will be taken to start achieving the milestone;</li><li>• Identify the planned completion date when all actions related to the milestone will be completed and overall milestone outcome is met; and</li><li>• List any relevant information that will be critical to the successful completion of the milestone (such as those examples listed in the question text above).</li></ul>

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*Note: After completing the template for each investment, the recipient should review the information provided to ensure accuracy, particularly in the Funding & Implementation Plan.*

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**I.B. Describe how this investment specifically addresses one or more of the funding priorities identified in the current year grant NOFO. Response Continued:**

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**II.A. Discuss how the implementation of this investment will decrease or mitigate risk. Describe how the project offers the highest risk reduction potential at the least cost. Include output and outcome metrics. Response Continued:**

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**III.D. Provide a high-level time-line, milestones and dates, for the implementation of this investment. Up to 10 milestones may be provided. Response Continued:**

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