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**Jewish Community Relations Council (JCRC) of Greater Washington
Testimony by Rachel Feinstein, Director of DC Government and Community Relations
Before the DC Council – Committee on the Judiciary and Public Safety
Performance Oversight Hearing – Homeland Security and Emergency Management
Agency
February 25, 2024**

Good morning, Chair Pinto, councilmembers, staff, and fellow panelists. My name is Rachel Feinstein and I'm a Ward 6 resident and Director of DC Government and Community Relations with the Jewish Community Relations Council of Greater Washington. The JCRC is the public affairs arm of the regional organized Jewish community, representing over 100 synagogues, community centers, schools, and social service agencies throughout DC, Maryland, and Virginia, including nearly 20 in the District alone.

Thank you for the opportunity today to speak on the Jewish community's experiences with DC's Homeland Security and Emergency Management Agency's (HSEMA) administration of the federal Nonprofit Security Grant Program (NSGP). I want to clarify that this program is not to be confused with the recently established DC-funded Safe and Secure DC Nonprofit Fund, administered by the Mayor's Office for Public Safety and Justice, which just closed its first application window of opportunity.

The NSGP is funded federally and administered by state agencies to help nonprofits at risk of hate crimes to pay for security enhancements and personnel. HSEMA administers this program for DC in addition to some suburbs of Maryland and Virginia within the National Capital Region. We are grateful for this program as it has provided significant investments and opportunities for nonprofits that otherwise would not be able to afford necessary security upgrades that enable Washingtonians, Marylanders, and Virginians to worship safely and joyfully.

While the federal program remains vital, grantees have experienced significant communication challenges when attempting to communicate with HSEMA program administrators. I reached out to HSEMA staff before this hearing to try to talk through these issues and find solutions for everyone to communicate more effectively, but I never received a response to my inquiry. This is indicative of the community's experience in working with HSEMA – no response to emails or even an acknowledgement of receipt.

HSEMA staff expect grantees to turn in paperwork on time, which is reasonable, but in many cases it's almost impossible to do so when responses from administrators are so delayed.

Grantees send several emails requesting technical assistance on paperwork or for grant extensions, but administrators take several weeks or months to reply. Following this testimony are examples provided by some grantees about their experiences with HSEMA.

One grantee reported that they finished a project funded by the grant and had extra funds left. They requested at the appropriate time – in August 2024 – to use the extra funds to pay for additional security training and on-site personnel, which was funded by the grant. Three months later, in November, HSEMA responded to the organization and approved the extension request; however, they did not approve the funding to be spent on the enhancements listed. Out of frustration, this grantee decided to close out their grant early, despite receiving an extension approval, as they doubted they would be able to complete additional projects in a timely manner due to such significant communication delays and inconsistent guidance from HSEMA.

It is possible for state and local administrators to run this program efficiently. One grant coordinator reported to us that they had a process question for DC's HSEMA. After a week or so passed with no response to several emails and with the clock ticking, this grant coordinator reached out to an NSGP administrator in a different state and received a response within minutes. HSEMA staff has never answered the original inquiry.

We know that DC's HSEMA staff are very hard-working, covering DC and two external jurisdictions, for which we are very grateful. Managing a grant program involves a detailed process to ensure transparency and equity. However, the process in practice is not equitable or transparent. We look forward to working with you and our partners at HSEMA to help rectify these issues and ensure this program continues to be a lifeline. Thank you for the opportunity to provide you with these comments.

Attachment 1: Feedback about DC Grant Office from Congregations

Congregation A

As a relatively new Executive Director, who stepped into this role, AFTER the grant applications were submitted. I am frustrated by the process. People who work for the office are not 'user friendly', they really don't answer questions. The process is not new user friendly – if you haven't done this before, they really don't help you. The process makes you NOT want to submit grants – which isn't a good answer either – when dealing with safety.

At CONGREGATION A, I would love to have armed security guards during preschool hours – 8:30-2:30 – Monday through Friday – but that is expensive, and when I asked about getting a grant – just to cover that, I was told there is nothing out there for personnel.

Thanks for listening...

Congregation B

We are in the same boat as many others regarding response times with the NSGP grants. When sending e-mails to request assistance or approval on various issues from the grant administrator, it will take weeks to months for us to get a response. When the responses come in, they are often inadequate.

Quarterly reports take weeks to months to get approval. Our grant extension wasn't approved until after the grant deadline had already passed (we continued to work on it anyway). At times, we have sent requests to one person, and have had to continue to push for a supervisor to respond.

Overall, it has been very frustrating to keep the paperwork going in a timely manner. They expect us to turn in everything on time, but cannot respond fast enough for us to do so.

Thanks for your help!

Congregation C

We have discussed the problems associated with DC-HSEMA in the past. The problems are summarized below.

- The project managers are extremely slow to respond to [in]queries. In far too many cases they simply do not respond. I have always used e-mail with “Request A Delivery Receipt” and “Request A Read Receipt”. One of the project managers responds to the delivery receipt, but the other does not. I have had to make numerous repeat calls and send e-mail reminders in order to get a response to matters associated with the grant. This is a source of unnecessary frustration and a waste of time.
- The project managers’ voice mail is either inoperative or they are extremely slow to respond to voice mail messages. In too many cases, there has been no response.
- The project managers are extremely slow in the review and approval of the Project Management Plans (PMP) and the Environmental and Historic (EHP) forms.

The above deficiencies makes it extremely difficult to properly and efficiently execute a grant.

The following suggestions are offered:

- The project managers either need additional help or they should operate in a more efficient way and with far better communication with the users.
- The training video should be taped so that the users can watch and rewatch it at their convenience. All documents needed by the users should be available for download by the users. This should include all instruction material.
- The website portal used by the users should also allow for communication with the project managers and with attachments allowed. This would provide a complete record of all project communications with the exception of phone conversations.
- All messages should be given a priority and users should know where they stand in the queue and when a response might be expected. And, when forms and items for reimbursement are submitted, the users should be given an approximate date when they might receive feedback or approval. Reimbursements have taken far too long.
- Users should be able to submit proposals from contractors to the project managers for their review. I.e., the project managers should tell the user if the items on a proposal are consistent with the approved PMP and eligible for reimbursement. I have been told by the project managers that they do not do this. But, in fact they do review the final invoice which should coincide with the proposal from the contractor. The issue is that items might not be approved for payment by the project managers when a user thought that the items were allowed by his/her PMP. The project managers may be operating under guidelines that do not allow them to review proposals. But, if this is the case, the user could prepare a detailed list of the items to be done by a contractor and then submit this list to the project managers.

- DC-HSEMA should strive to develop a quality system. This would include periodic reviews of operations by the director of DC-HSEMA or his/her designate as well as reviews and suggestions by users.
- The Department of Homeland Security should exercise its oversight of grant operations to include the efficiency, accuracy, and aid given to users. If an agency is not performing its job properly, it should be replaced by another agency.

Congregation D

Thank you for inquiring about this issue. Please forgive the length of my response, but I wanted to include details, including dates.

I have been the lead for my synagogue for 2 NSGP grants, one in 2019, the other 2021. The challenges in dealing with the grant managers in DC have been beyond frustrating; they have delayed and sometimes prevented us from using the grant funding effectively. I want to note that we are a small Temple, primarily volunteer run, including myself in the grant management role.

In general, email questions go unanswered, though on rare occasion I did get a prompt response. The pattern seems to be that you might on occasion get a response the same day or next day, but if you don't its likely none will ever occur. On a few instances I tried to reach the individual [staff] by phone and was unsuccessful. In some cases [voice] mail boxes were full, in other cases messages simply went unanswered. I gave up attempting communication by phone several years ago since that was never successful.

Requests for any type of approval (PMP, EHP, etc.) would take months. I will provide two representative examples, one regarding our most recent grant extension, the other our last PMP update.

This relates to our request for a grant extension.

- Background: By March 2024 we had essentially completed all items in the original plan, but had some funds unspent from several physical enhancements that were completed under budget.
- August 2024: Extension request submitted. From that request "The purpose of the extension is to leverage unspent funds related to security plans, procedures, training, and on-site security personnel for the extension period as we are still in a higher than usual threat environment for the Jewish community due to current

events.” FYI, the total dollar amount being requested for reallocation was \$7250 (a lot for our small organization) out of a total grant award of \$104,000.

- November 7, 2024: Extension approval received. Same day email from me to the people identified above, “Please confirm that the extension includes the reallocation of unspent funds per the extension request in SAA.SP since the only thing specified in the sub-award adjustment letter is the change in performance period.” Next day response from [HSEMA staff], “The subaward adjustment does not imply the approval of the reallocation of funds”. Why approve the extension without approving the rationale for it, which was provided in detail in the request, including specific dollar amounts? Still, I then responded, same day via email “Then what must be done to obtain approval for the reallocation, since that was the rationale behind the extension?”. No response was ever received. I suspected a PMP update would be required, but if so, when didn't they "return" the PMP to an unapproved state in SAA.SP, a necessary precursor to us requesting a PMP update? I did suspect a PMP update would be required, but the last time we did that the process took 6 months (8/2022 – 2/2023) just to get the status reset, and I was hoping to shortcut that kind of lengthy delay.

This relates to that last PMP update, mentioned above.

- Background: As mentioned above, to update the PMP the grant administrator must “return” the PMP to an unapproved state in SAA.SP. A formal PMP update request cannot be done until this occurs.
- Aug 21, 2022: Email sent to [HSEMA staff] requesting that PMP state be changed (“returned”) to allow us to submit updates. No response received.
- Sept 4, 2022: Desired PMP changes uploaded SAA.SP as PDF document along with repeat of request to change actual PMP state to allow changes to be submitted. My thinking was formally documenting the request within the grant management tool might help get some attention. I also sent another email that same day stating what I had done. No response received; no action resulted.
- Oct 3, 2022: Third quarter status report submitted, again stating the need for the PMP state to be updated to allow changes to be submitted. An email was also sent to [HSEMA staff], again stating the need for an update. No response received; no action resulted.
- Oct 25, 2022: In response to email from the grant administrators that our 3rd quarter status report had been approved I again emailed regarding the need to update the PMP. No response received; no action resulted.
- Feb 14, 2023: Email received from [HSEMA staff] questioning what changes we wanted to make to the PMP. It sounded to me as if [they] had never read the prior

emails or updates in SSA.SP. About 30 minutes later she sent a second email stating the PMP state has been changed to allow updates.

- Feb 17, 2023, I formally submitted the PMP updates in SSA.SP. Approval occurs the same day. (Now, that was a surprise.)
- Elapsed time from first request to reset PMP state to allow updates until this occurred, 6 months.

These scenarios are indicative of many in the past. Because of past frustration I actually skipped one of my required 2024 quarterly status reports. No one seemed to notice. Again, out of frustration we decided after the start of the new calendar year to simply close out the 2021 grant, despite the extension, since we doubted we could get the PMP updates done in time to make it useful.

Thanks for tolerating this long email. Writing it was actually somewhat cathartic.

Congregation E

- I generally try to avoid reaching out to the DC office unless I absolutely need to; when I've had inquiries in the past on clarification questions, confusion with using the system, or in familiarizing myself with the 'vocabulary' of the grant, I sometimes feel like the response is 'DUH - why don't you get this!?' - the attitude / feedback loop isn't always worth the outreach.
- They very strongly encourage the process of reporting but when I've put inquiries directly into the reports, I haven't heard back.
- It's hit or miss on how quickly I receive a response when I do need to reach the office; sometimes they will respond immediately and other times, it will take a few tries.
- Computer system and log-in are always challenging and not user-friendly. I've had times where I've spent 10 minutes trying to submit the same form, wondering if I've lost my information, etc.
- Big Picture - It feels like all of these stereotypes around government inefficiency come to life whenever I have to deal with this grant.