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The Honorable Kristi Noem
Secretary, U.S. Department of Homeland Security
2707 Martin Luther King Jr. Ave SE
Washington, DC 20528

August 22, 2025

The Honorable David Richardson Senior Official Performing the Duties of FEMA Administrator 500 C St. SW Washington, DC 20024

Dear Secretary Noem and Acting Administrator Richardson,

I am writing to urge you to issue new guidance that waives vague and concerning language in the terms and conditions for the Nonprofit Security Grant Program (NSGP). As written, these terms and conditions have created significant confusion among potential recipients -- and could force Jewish and other houses of worship and institutions to choose between vital security funding and their core religious beliefs and values. JCPA has been in close coordination with our national, state, and local partners in the Jewish and interfaith community, as well as with federal, state, and local government officials – and as State Administrative Agencies prepare the process for individual institutions to apply, there is now a limited vital window to clarify these terms and conditions before institutions must decide whether to accept a grant.

NSGP is incredibly important to the safety and security of the Jewish community and so many others. At a time of rising violent antisemitism, NSGP funding helps synagogues and other Jewish institutions protect against threats by supporting added safety measures, like security cameras or hardened facility security. That is why, as our communities face an alarmingly high number of hate crimes, we have both encouraged institutions to apply for these vital funds and called on Congress to significantly increase NSGP funding to meet this need.

We are grateful that the latest round of NSGP funding has been officially noticed and that states have completed their applications. Now, as houses of worship and other nonprofits prepare to apply for NSGP funds through their states, we are deeply concerned about requirements in the terms and conditions published by DHS on April 18, 2025 that would

dictate how these recipients can conduct themselves, such as requiring cooperation with immigration enforcement and prohibiting work considered to be "illegal DEIA."

We appreciated that the Notice of Funding Opportunity released through grants.gov on July 28, 2025 clarified that the language around "Communication and Cooperation with the Department of Homeland Security and Immigration Officials" does not apply to this funding. However, a different Notice of Funding Opportunity posted by FEMA on August 13, 2025 did not include this exemption -- instead stating that the immigration conditions "may be material" to the award. While this second notice appears to be an error, this has contributed to the significant confusion and concern about the terms synagogues and other institutions will actually agree to in accepting NSGP funds.

In addition to the contradictory information put out about cooperation with immigration enforcement, there is confusion and concern about what is meant by "illegal DEIA." While work to promote diversity and equal opportunity remains legal, this language creates confusion about how it will be applied and who will be targeted. The Jewish community is incredibly diverse - from LGBTQ+ Jews, to Jews of Color, to immigrant and refugee Jews. Many synagogues and Jewish institutions host programs and services to engage and support these vital parts of our community, as well as to support and advance core Jewish values of justice, charity, and equity with our neighbors and in our broader communities and society.

The additional community security made possible by NSGP funding has saved lives and helped communities, including and especially Jewish communities, become more secure at a time of increasing violence and hatred. That is precisely why this funding is too important to be politicized.

We continue to encourage Jewish and other institutions to apply for this vital funding. However, before institutions accept these grants, the terms and conditions must be updated to waive the immigration enforcement conditions and the prohibition on "DEIA" work.

Our communities desperately rely on this security funding -- and they need clarity that what they are agreeing to in accepting these funds won't force them to override their deeply held religious values and beliefs.

Sincerely,

Amy Spitalnick

CEO

Jewish Council for Public Affairs