

American Rescue Plan Act (ARPA) Nonprofit Assistance
Frequently Asked Questions (FAQ)
Revised Version – April 15, 2022

QUESTION:

Do you have to have a storefront to be considered for ARPA Nonprofit Assistance?

RESPONSE:

There is no ARPA requirement to have a physical location of storefront.

QUESTION:

We are working to complete the ARPA screening form and are finding the selections made are not saving and/or are showing in different places. We can send examples if requested.

Is it acceptable that we print, complete and submit to ensure accuracy?

RESPONSE:

We recommend that you download a copy of the PDF ARPA screening form and fill in and then save. If you are still having trouble, you can print and complete legibly, and then scan and submit that copy. You may also email budget@myokaloosa.com and ask for a copy of the form in Word.

QUESTION:

I need clarification as it was my understanding that the only way ARPA funding could be used towards a building was if you applied for capital and qualified under the special circumstance and could only request up to the amount of losses incurred – is this correct?

Would losses from not being able to hold normally scheduled fundraisers be allowed to be used as part of the amount lost/impacted?

RESPONSE:

On page 18 of the ARPA Application document (or page 6 of 10), capital expenditures are eligible if the applicant identifies a harm or impact to a beneficiary caused or exacerbated by the public health emergency or negative impacts.

Additionally, on page 15 of the ARPA Application document (or page 3 of 10), you are asked to indicate the challenges faced since the start of the pandemic. One of the options is decreased revenue (donations and fees).

The Coronavirus State and Local Fiscal Recovery Fact Sheet dated May 10, 2021, states the funding can be used to:

- Support public health expenses
- Address negative economic impacts caused by the public health emergency
- Replace lost public sector revenue
- Provide premium pay for essential works, and
- Invest in water, sewer and broadband infrastructure

Under the “Addressing the negative economic impacts caused by the public health emergency” section, providing loans, grants, in-kind assistance, and counseling programs to enable small business to rebound from the downturn is allowable. I would encourage you to read the FACT SHEET and more detailed Federal Guidance on the uses of the funds. The link is provided on the County’s page below:

<https://myokaloosa.com/nonprofitfunding>

QUESTION:

In the budget lines, is this our current and past years annual budget? Or do you want our budget for the upcoming project?

RESPONSE:

This is for your current year budget. Some applicants in the past have included the budget for the proposed project. The directions state “Provide a clear budget that indicates a reasonable expense for the Program services leverages other funds to the greatest extent possible”. The objective here is to show how the funding request from Okaloosa County is supported by other agency funding.

QUESTION:

Can we apply for both grants without negative impact on either?

RESPONSE:

Applying for both grants is permissible. The applications will be independently considered.

QUESTION:

Can we use capital funding for renovations of a building?

RESPONSE:

The Coronavirus State and Local Fiscal Recovery Fact Sheet dated May 10, 2021, states the funding can be used to:

- Support public health expenses
- Address negative economic impacts caused by the public health emergency
- Replace lost public sector revenue
- Provide premium pay for essential works, and

- Invest in water, sewer and broadband infrastructure

Further, on page 18 of the ARPA Application document (or page 6 of 10), capital expenditures are eligible if the applicant first identifies a harm or impact to a beneficiary caused or exacerbated by the public health emergency or negative impacts. If that can be done, there are further steps to be followed.

I would encourage you to read the FACT SHEET and more detailed Federal Guidance on the uses of the funds. The link is provided on the County's page below:

<https://myokaloosa.com/nonprofitfunding>

American Rescue Plan Act (ARPA) Nonprofit Assistance
Frequently Asked Questions (FAQ)
Interim Version – April 4, 2022

QUESTION:

Are churches eligible to apply for assistance for activities that are open to the community at large (feeding programs, etc.)? Churches don't file 990s and don't have the State of Florida Solicitation of Contributions form.

RESPONSE:

Religious organizations are eligible to apply for funding if they qualify under the application process, including being organized as a 501(c)(3) or 501(c)(15) corporation. The federal funds provided may not be used to support what the law calls "inherently religious" activities which the U.S. Supreme Court has opined is religious worship, instruction or proselytization, but a religious organization may be used to support the non-religious social services provided for by the organization. The Federal government also requires that if any nonprofit receives federal money it may not discriminate against a person seeking help who is eligible for the service. For example, if a religious organization receives public money to run an emergency food distribution program, it may not serve only persons of the same faith and turn away others.

QUESTION:

May an employee of Okaloosa County, that is also associated with a Nonprofit, apply for this grant opportunity, would this be a Conflict of Interest?

RESPONSE:

The Federal law under 2 CFR Part 200 requires the County to adopt conflict of interest requirements for funding. The County has adopted the conflict of interest requirements that mirror the Florida Commission on Ethics laws found in chapter 112, Florida Statutes.

So long as the County employee at issue serves solely as an uncompensated member of the Board of Directors of the nonprofit, there would be no prohibited conflict under 112.313(7)(a), Florida Statutes. Additionally, within the grant context, there are opinions where the Florida Commission on Ethics that have found no violation where a local government employee/officer applies for grants through a program administered by the local government so long as the employee does not have any role in the program or the approval of the grants.

A county employee who is applying for funds must confirm in writing that they serve solely in an uncompensated capacity as a member of the Board of Directors.

QUESTION:

I was looking at the grant application for 501 C 3 organizations and am wondering if our Foundation might be able to apply for funding. There are a lot of projects that fall under our Foundation that we are not able to do because the funding is not there. Our charter is focused on supporting educational, environmental and arts related projects.

RESPONSE:

Visit our recently updated webpage: <https://myokaloosa.com/nonprofitfunding>. To be eligible to apply for ARPA funding, a non-profit must be a 501(c)(3) or 501 (c)(19). There is additional eligibility criteria identified in the May 21, 2019 funding policy and ARPA funding guidance supplement.

QUESTION:

What is the intent behind these grants and what type of project/support funding applications are they looking for?

RESPONSE:

Review the guidance and each application for insight. Please also refer to the evaluation criteria identified on page 5 of the Non-Profit Application. It may also be helpful to listen to BCC discussion on this topic:

March 1, 2022 (1:56:54)

<http://okaloosacountyfl.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=1792&Format=Agenda>

January 4, 2022 (1:21:30)

<http://okaloosacountyfl.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=1788&Format=Agenda>

QUESTION:

If I can't locate our organization's IRS Determination Letter of 501c3 status, how do we obtain one?

RESPONSE:

Per the IRS website, you can obtain an IRS Determination Letter of 501c3 status as follows:

"You can download copies of original determination letters (issued January 1, 2014 and later) using the IRS on-line search tool: Tax Exempt Organization Search (TEOS).

To otherwise request a copy of the original determination letter, submit Form 4506-B, Request for a Copy of Exempt Organization IRS Application or Letter PDF using the email feature on the form. You can also fax Form 4506-B to 855-204-6184 or mail to:

Internal Revenue Service
Attn: Correspondence Unit
P.O. Box 2508, Room 6-403
Cincinnati, OH 45201

This may take 60 days or longer to process your request this way, so you may wish to use the download method in order to obtain the document more quickly. You may also request an affirmation letter using Form 4506-B. The affirmation letter serves the same purpose for grantors and contributors as the original determination letter.

Additionally, the website for information and links is: <https://www.irs.gov/charities-non-profits/eo-operational-requirements-obtaining-copies-of-exemption-determination-letter-from-irs>.

If you are a subordinate organization under group exemption ruling, contact the central organization that holds the group ruling to obtain confirmation of your status as a member of the group. See Publication 4573 PDF, Group Exemptions, for more information."

QUESTION:

Can nonprofits submit applications for both annual and ARPA funding?

RESPONSE:

Yes; however, organizations should be aware that applications that provide evidence of decreased reliance on Okaloosa County funding will receive greater consideration per the evaluation and scoring criteria outlined on Page 5 of the Non-Profit Application.

QUESTION:

If my organization is awarded a grant and cannot meet the federal procurement requirements, such as securing a sufficient number of quotes from vendors, can this be waived?

RESPONSE:

The County will provide training and assistance to organizations that are awarded funding to ensure that federal grant requirements are met. When it comes to obtaining quotes, we have to document all requests for quotes. We have to show a concerted effort to obtain multiple quotes. If after all of this we have received only one quote, we then have to determine if the quote is reasonable. Generally, the Federal granting agencies, like Treasury, require us to then try receiving additional quotes. As we go through this process, we can evaluate the current circumstances and provide further input at that time.

QUESTION:

Is a copy of the presentation from the March 31 webinar available?

RESPONSE:

A copy of the presentation slides and recorded webinar is available on the County's website at <https://myokaloosa.com/nonprofitfunding>.

QUESTION:

If I have additional questions, how should I should them?

RESPONSE:

Please send an email to budget@myokaloosa.com with your detailed questions and we will respond as soon as possible.

QUESTION:

What is a unique entity ID verification and how do I obtain one?

RESPONSE:

On April 4, 2022, the unique entity identifier used across the federal government changed from the DUNS Number to the Unique Entity ID (generated by SAM.gov). The Unique Entity ID is a 12-character alphanumeric ID assigned to an entity by SAM.gov.

If your entity was already registered in SAM.gov, your Unique Entity ID has already been assigned and is viewable in SAM.gov. This includes inactive registrations. The Unique Entity ID is located on your entity registration record. You must be signed in to your SAM.gov account to view entity records.

New entities can get their Unique Entity ID at SAM.gov and, if required, complete an entity registration. Once you have successfully registered in Sam.gov, you are issued a unique entity identifier. Institutions should allow 10-12 business days after completing the process for the registration to be active in SAM.

Visit sam.gov for more information.

QUESTION:

Is the tax ID number the same as the unique entity ID?

RESPONSE:

No. Please see information above.

QUESTION:

Is the number of clients served section on the application for the number served by the entire organization or for the number served specifically for the program you're seeking funding for?

RESPONSE:

It is specific to the project or the program or capital expenditure that you are seeking funds for. Feel free to include more information within your proposal about your total clients that you serve.

QUESTION:

Would updating a software program be allowable-it is heavily relied on, especially during pandemic?

RESPONSE:

The application is encouraged to review the Final Rule on the Coronavirus State and Local Fiscal Recovery Funds published January 27, 2022 to review information specifically related to the eligibility of software.

An applicant must provide clear justification on how such a proposed expenditure will respond to the public health emergency or address its negative economic impacts.

QUESTION:

Can you define what you mean by one year of operation?

RESPONSE:

The dates reflected on the organization's establishing documents must be on or before March 1, 2021.

QUESTION:

Are there any regulations for organizations that span multiple counties?

RESPONSE:

Organizations may have originated in other places or may be serving multiple counties; however, for funding under the Okaloosa County program, the funds must be serving Okaloosa County residents.

QUESTION:

Are subscriptions an eligible expense?

RESPONSE:

For the purpose of the non-profit application, an annual subscription service would be classified as an operating expense. Your application would have to explain what this service is, who benefits, what is the purpose, etc. Also, as with all applications, show how the expenses meets the eligible of the American Rescue Plan Act and how the project supports the County's vision.
