



# Loudoun County



VIRGINIA

WHERE TRADITION MEETS INNOVATION

## American Rescue Plan Act (ARPA) Frequently Asked Questions

*for the 2021 Nonprofit and Faith-based Organizations ARPA Application*

- 1. I heard that if we received CARES funding, we are not eligible for ARPA funding, is that correct?** That is not correct. All nonprofits with a 501(c)3 designation are eligible to apply for ARPA funds, regardless of other funding they received to support COVID-19 mitigation efforts.
- 2. Is ARPA funding only for organizations that have not received CARES funding? Or CARES altogether? So, if we applied to CARES we are not a new applicant?** Correct.
- 3. If we received CARES funding but NOT from Loudoun County, can we apply?** Yes, as long as you meet the eligibility requirements.
- 4. If we received CARES funding, we could apply for ARPA, correct?** Correct.
- 5. For County Funding Requested in the application, do we submit our one-year request or our two-year request? I ask because we are asked to include a spending plan for two years.** Your funding request should be for one year.
- 6. Since this application is for FY22 funds, why are we being asked to estimate our FY23 funds on this application?** Loudoun County wants organizations to begin thinking about their long-term recovery plan.
- 7. Please provide chapter and verse that defines "non-profit" in the American Rescue ACT.** Under the definitions section (§35.3 Definitions.) of the Department of the Treasury's Interim Final Rule (p. 26820) found here: [Interim Final Rule](#), a *Nonprofit means a nonprofit organization that is exempt from Federal income taxation and that is described in section 501(c)(3) of the Internal Revenue Code.*



# Loudoun County



VIRGINIA

WHERE TRADITION MEETS INNOVATION

8. **What are the average grant amounts?** There is not an average amount. Loudoun County asks that organizations be reasonable and realistic in their funding request.
9. **Is there a cap on request amounts?** There is no cap. Loudoun County asks that organizations be reasonable and realistic in their request.
10. **Our FY23 estimate is like looking in a crystal ball. Will we be constrained to whatever estimate we provide? And should we include the FY23 estimate in the box for total funds requested?** Your organization will not be held to the estimates, but we will need these to plan for FY23 funding programs.
11. **Are software programs for virtual services such as GoTo Meeting or Zoom allowable costs?** Yes, GTM and Zoom would be eligible expenses.
12. **Does this include churches that have reduced staffing pay and would like to make those folks whole? Does this include church staffing and payroll reductions?** Funds cannot be utilized for any religious purpose including, but not limited to; religious worship, instruction, or proselytization. Funding may be used only to support nonreligious social services. Organization may not discriminate, or otherwise condition its services, based on religious affiliation.
13. **We only list amount requested for year 1 in the appropriate box, correct? So, I should exclude the FY23 estimates from the total amount requested, right?** That is correct. The requests should only include one-year costs.
14. **Does the application allow the applicant to save the content and return later or do you have to complete the application all at once? Is there an accessible version of this application for those who have vision impairments and/or for those who require simple language format? Can you provide a word version of the application?** All applicants must submit through the online application. Loudoun County has created a fillable PDF worksheet to assist organizations in drafting answers to questions that require a narrative. The form can be found here: [loudoun.gov/grantopportunities](https://loudoun.gov/grantopportunities). Note that this form is a data gathering worksheet and is not in place of the online application.



# Loudoun County



VIRGINIA

WHERE TRADITION MEETS INNOVATION

- 15. My organization is a 501(c)(4) and we received thousands of dollars under the CARES ACT. Will we be able to apply under the new act? Did Loudoun County make the decision to restrict the funding to 501(c)(3)?** 501(c)(4) organizations are not eligible to apply under this funding opportunity. This decision was made to be consistent with CARES Act Funding as well as other programming.
- 16. So you are saying that organizations that are 501(c)(4) who have spent over \$10,000 to help COVID-19 victims and who have not able to raise funds are expected to spend all their funds until our organization is forced to close its doors?** 501(c)(4) organizations are not eligible to apply under this funding opportunity.
- 17. If the national branch holds the 501(c)(3) and the funds then flow to us on the local branch level as a 501(c)(4) can we still participate in the ARPA funding?** No. Distribution of funds from one charitable organization to another is not allowable under this funding.
- 18. We have partnered extensively for Sterling Ruritan during COVID-19. As a 501(c)(3), could we partner with an organization like this, with us as the lead, that is a 501(c)(4), or is that prohibited because of the 501(c)(4) designation?** Loudoun County staff have requested interpretation from the County Attorney's Office, and this is the official response: Organizations who are the direct beneficiary of ARPA funds must be 501(c)(3) organizations. No organization can be a subrecipient to another grantee, regardless of exempt status. ARPA funds are not intended to be pass through to additional organizations.
- 19. To confirm, we must choose either service interruption OR service expansion, even if different programs have been affected differently?** Organizations can apply for Food Assistance and Expansion jointly. If not applying for Food Assistance funding, organizations must choose between Expansion, Interruption or Continuity Programs.
- 20. For recovery plan - are you speaking more broadly to the agency as a whole or specific to this funding request?** More broadly to the agency as a whole.



# Loudoun County



VIRGINIA

WHERE TRADITION MEETS INNOVATION

- 21. Is there a word limit to the answers?** There is no word limit. Loudoun County asks that your responses be clear and concise.
- 22. We run a childcare center that we kept open to serve our community parents that still needed childcare (such as first responders, health care workers and others that still needed to go to work). Many childcare centers closed all together but we stayed open to serve the community--the number of children and income went way down from our pre COVID-19 levels of course but we kept our staff on and we had a very negative cash flow issue. So, does this apply?** Yes, this would apply.
- 23. If we were to partner with churches to reach multiple marginalized communities, is that acceptable?** That is acceptable as long as the funds stay with the organization funded. No organization can be a subrecipient to another grantee, regardless of exempt status. Additionally, churches may not use the funding for religious services, or activities that support religious services.
- 24. For amount of COVID-19 funding question listed in the application, should we only include the portion of funding that we received as an agency that benefited Loudoun programming/residents?** Yes, Loudoun County is looking at Loudoun County programming only.
- 25. So, can non-religious nonprofits use these funds for payroll costs?** Yes. A non-religious nonprofit may request payroll or operations for non-religious activities.
- 26. Do you need detail on ALL other funding from private sources that came in to support COVID-19 relief? If so, can I roll up to categories rather than itemizing donors?** Yes, you can roll up to the categories.
- 27. If your operations extend beyond Loudoun, do you want non-Loudoun CARES funding?** No, Loudoun County is only interested in Loudoun funding.



# Loudoun County



VIRGINIA

WHERE TRADITION MEETS INNOVATION

- 28. Is continuity of service from pre-COVID-19 activities?** This program provides funds to organizations that can demonstrate that their level of services and residents served have been maintained at a consistent, stable level but have had unexpected costs due to the COVID-19 pandemic. New applicants must demonstrate that their services have; (a) expanded due to COVID-19 and are now maintaining pandemic-level services or, (b) have maintained their service level throughout the pandemic but can demonstrate additional new costs for adaptations or service delivery changes.
- 29. What is difference between service expansion and food assistance if your expansion is to provide food services for additional residence?** Under food assistance, organizations may request funding for the purchase of food and food delivery expenses. Each applicant must demonstrate a continued need for funding, such as year-over-year increases in the number of clients, to be considered for ARPA funding. Under service expansion, Loudoun County will provide ARPA funds to organizations who demonstrate they have significantly expanded their services due to COVID-19. Each applicant must demonstrate their expansion for COVID-19 services will continue into the next fiscal year. New applicants must demonstrate how they expanded services due to COVID-19, while previous applicants who have expanded services and require further expansion, must demonstrate the need for further expansion.
- 30. If we are able to prove that different programs in our organization have been impacted differently by COVID-19, do we still need to choose between service expansion and service interruption?** Yes, if you are not applying for Food Assistance funding, organizations must choose between Expansion, Interruption or Continuity Programs.
- 31. Must an organization have brick and mortar location in Loudoun County to apply or can organizations that serve Loudoun County with no building apply also?** A physical location in Loudoun County is not required however, you must serve Loudoun County residents.
- 32. Is 990 postcard sufficient?** Yes.



# Loudoun County



VIRGINIA

WHERE TRADITION MEETS INNOVATION

- 33. What if your 990 for 2020 has not been filed since the year end is 6-30-2021.** Provide the most up to date information you have and explain any variances or reasons why the required documentation is not included.
- 34. Can you send the link to the VA laws that restrict funding of this type to go to churches?** Churches and faith-based organizations that are 501(c)3s are eligible to apply for this funding. Subject to limited exceptions, Virginia law prohibits localities from appropriating public funds to organizations controlled in whole or in part by churches [to include other houses of worship such as temples, mosques, synagogues, etc.] or sectarian societies. Therefore, a faith-based organization may be eligible to receive grants from Loudoun County only if it can submit evidence satisfactory to Loudoun County staff demonstrating that (i) it is not controlled in whole or in part by a church or sectarian society; and (ii) the programs of such organization do not discriminate based on and are not otherwise contingent upon the religious affiliation of participants or those eligible to receive assistance. Furthermore, Loudoun County grants may not be used for any religious activity. [§ 15.2-953. Donations to charitable institutions and associations, volunteer and nonprofit organizations, chambers of commerce, etc. \(virginia.gov\)](#)
- 35. Regarding staffing, is the question regarding all staff in the organization or only the staff directly working on the program.** Under the financial section, Loudoun County is asking for the number of employees on your payroll for your organization.
- 36. Back to staffing, should we list only staff who are working in Loudoun County?** Loudoun County is interested in the impact within Loudoun; therefore your organization will need to report any staff that are working on behalf of Loudoun residents.
- 37. What is requirement for statement of activities and position?** A statement of activities quantifies the revenue and expenses for a reporting period while the balance sheet provides a snapshot of your assets and liabilities. Statement of Activity = Profit/Loss Statement. Statement of Financial Position = Balance Sheet. If a recently completed audit is provided, internal financial statements are not necessary. If no audit file is submitted, both Statement of Activities and Balance Sheet are required.



# Loudoun County



VIRGINIA

WHERE TRADITION MEETS INNOVATION

- 38. Do you need us to upload our SCC doc? There is not a request for it, but the guidelines state good standing is required.** Yes, a request for it has been added to the application.
- 39. So how do I provide a budget balance sheet?** Your balance sheet is your organization's Statement of Financial Position.
- 40. Will a completed copy of the proposal be sent to us with a confirmation once we hit submit?** Yes, you will get a copy of your application with a confirmation notice.
- 41. Under the Financial Questions, with budget: I thought I saw "2021 budget", then a place to upload statement of activities, and financial position. Do you want our 2021 budget, as an attachment?** Yes, please upload it under additional attachments.
- 42. Are attachments subject to the FOIA?** Yes. Only under certain circumstances will documents be deemed confidential. Should any FOIA requests be made, Loudoun County lets the organization know.
- 43. Will Loudoun reduce requests amounts in awards if needed or deny the request altogether if the requested amount is deemed too high?** Award amounts may likely be reduced to allow for more organizations to receive funding. Requests will be denied only if the organization is deemed ineligible or, the proposed uses of funds do not meet the criteria.
- 44. Does the funding request need to be spent in a particular time frame?** Yes, between July 1, 2021 and June 30, 2022.
- 45. With Services Continuation - can the funds be used for transportation to/from services in Loudoun County?** Yes, this would be an eligible expense.
- 46. Are capital expenses allowed?** Yes. Loudoun County will look at these by a case-by-case basis.



# Loudoun County

VIRGINIA

WHERE TRADITION MEETS INNOVATION

- 47. Follow up on Capital Expenses - When you say that a capital expenses request may be moved to another funding source, should we wait to apply for that or proceed and apply here?** Proceed and apply here so Loudoun County can better determine need.
- 48. If your services expanded considerably in 2020 but now have stabilized to the same 2020 level, is that expansion or continuity?** Continuity.
- 49. Will this recording be available after this meeting?** Yes.
- 50. Will the webinar slides be sent to attendees?** No. The webinar will be posted to Loudoun County's website and can be found here:  
<https://www.loudoun.gov/grantopportunities>
- 51. How many years of income statement and balance sheet? If we just have most recent does that suffice?** 2019, 2020 and YTD 2021 are required.
- 52. If awarded, when would funding be received?** Loudoun County staff will review applications and determine funding on a rolling basis until July 28, 2021.
- 53. When is the application due? When will grantees be announced? When will funds be delivered?** Applications are due July 28<sup>th</sup> at 4:00 p.m. Loudoun County staff will review applications and determine funding on a rolling basis until that date.
- 54. Should the funding request be based on our organizations needs for the grant period, i.e., 7/1/21-6/30/22?** Yes.
- 55. So for administrative expenses, we will have to provide timesheets of indirect staff who support the project (e.g., finance staff who process direct assistance) with highlighted hours of time charged to the grant?** Yes, if you are requesting funding for staff, you will need to report their time charged to provide direct or indirect assistance to Loudoun residents.



# Loudoun County



VIRGINIA

WHERE TRADITION MEETS INNOVATION

- 56. If we are doing rental assistance, are we able to help those that would qualify for RRP? We now have to refer them if they might qualify to RRP.** Rental assistance can be provided only to those not eligible under the state’s Rental Relief Program (RRP). If your organization is interested in supporting residents with rental relief, consider requesting funds for staff who can support residents in completing RRP application. If residents are not eligible for RRP funding, your organization can apply for funds to support their rental needs up to \$599.
- 57. Will Loudoun County be providing a sample logic model template for evaluation/reporting?** Yes.
- 58. May a single nonprofit apply for multiple grants if we have 2 programs in different categories.** No, an organization is only allowed to submit one application. Be as descriptive as possible in your narrative explaining your two programs and how funding will be distributed.
- 59. On the application budget grids: Is the food expense budget a subset of the spending plan? If so, does all food go in supplies in the spending plan? Or, are they two separate things and if there are no non-food or food delivery expenses we leave spending plan blank?** If you apply for food assistance, a spending plan that breaks down food, boxes and packing materials is provided.
- 60. For food assistance, are gift cards to grocery stores allowable expenses. If so, is there specific reporting such as recipient, date, etc.?** Gift cards are an eligible expense. The following information will be required to track the expense:
1. Card number
  2. Card source (Giant, Safeway, Aldi, Food Lion, Harris Teeter)
  3. Location of card purchase
  4. Date of card purchase (keep receipt as attachment)
  5. Name of staff who purchased card
  6. Name of staff person distributing card
  7. Location where card was distributed
  8. Date card was distributed
  9. Name of person to whom the card was distributed
  10. Signature of person to whom the card was distributed
  11. COVID-related hardship for recipient