



STATE OF ALABAMA
DEPARTMENT OF MENTAL HEALTH

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Kay Ivey
Governor

Kimberly G. Boswell
Commissioner

April 2, 2024

Commissioner Kent Davis
Alabama Department of Veterans Affairs
100 North Union Street
Montgomery, AL 36104

Dear Commissioner Davis,

This letter serves as notice of intent to terminate the Interagency Agreement between the Alabama Department of Mental Health (ADMH) and the Alabama Department of Veterans Affairs (ADVA) for the administration of \$7 million in ARPA funds. After much discussion with your staff, we have been unable to agree on several contracting issues. I have outlined below the reasons for the decision.

As you know, ADVA requested that ADMH serve as the fiscal agent for the ARPA funds by writing contracts, processing invoices and payments, and managing program monitoring/accountability through quarterly reports. ADVA was responsible for developing and writing an RFP for grants and making decisions regarding who is selected to receive the funds and how much funding is allocated to each applicant.

After many conversations and a recent zoom call with grant recipients, there are serious concerns about the administration of these grants:

- We raised concerns about a grant recipient who requested funding for lobbying and explain that all our contracts contain language that prohibits the use of state and federal funds for lobbying. This is state and federal law. We did not receive a firm commitment to require the grantee to remove this item from their request. Of note, this same entity is a member of the ADVA Board.
- In the recent Zoom call with grantees, it was suggested that the contract amount could be the amount proposed in the application rather than the amount approved by ADVA. This is not true and would create a financial obligation for ADMH if we wrote contracts above the approved amount.
- There has been a lot of discussion about lump sum payments versus cost reimbursement. While this is an acceptable practice, our experience has taught us lump sum payments make accountability very difficult.



These concerns put ADMH at risk of potential audit findings and other negative consequences. Given the current ADVA position on these matters, this is our sixty-day notice to terminate the agreement. We will return the \$7 million in ARPA funds in full.

It is our understanding you have been working with the Department of Finance regarding the contracting process, sample templated, and other assistance that will allow you to expedite the contracts to meet the June 1, 2024, deadline.

While this sounded like a great opportunity to work together, I am sure you understand the need for ADMH to decline to assume the potential liability.

Sincerely,



Kim Boswell
Commissioner

cc: Nicole Walden
Tommy Klinner
Leola Rogers



Kay Ivey
Governor

Bill Poole
Finance Director

STATE OF ALABAMA
Department of Finance
Legal Division

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Taylor Nichols
General Counsel

April 12, 2024

Ms. Beverly Gebhardt
General Counsel
Department of Veteran's Affairs

Ms. Gebhardt:

On November 16, 2022, the Department of Finance (DOF), in accordance with Alabama Act No. 2022-1, provided the Alabama Department of Veteran's Affairs (ADVA) with \$5,000,000 in American Rescue Plan Act (ARPA) funds to be used for the reimbursement of mental health care costs at Alabama's state veteran homes.

On August 24, 2023, the DOF, in accordance with Alabama Act No. 2023-1, provided ADVA with an additional \$2,000,000 in ARPA funds to be used to support mental health programs and services. At the time of this second agreement, the ADVA had not obligated or expended any of the funds distributed pursuant to the first agreement. In addition, the terms of the second agreement supersede the terms of the first agreement, and the second agreement presently remains in effect. The second agreement states that the ADVA will comply with all U.S. Treasury guidance for the use of ARPA funds and permits administration of the funds through a subsequent agreement between the ADVA and the Alabama Department of Mental Health (ADMH). ADVA subsequently entered into an agreement with ADMH to administer the grant of ARPA funds.

Although the disbursement of the ARPA funds is not subject to the procedures of Alabama procurement law, ADVA and ADMH released a Request for Proposals (RFP), apparently mirroring procurement procedures required by the state's procurement law, to solicit proposals for projects to be funded with the funds. Proposals were submitted to ADVA by December 1, 2023. DOF advised against the use of the RFP process due to the requirement that the funds be obligated by June 1, 2024, as set forth in the agreement between DOF and ADVA. DOF further advised that if an RFP process was utilized, ADVA should use some form of an abbreviated process to enable a timely disbursement and obligation of funds.

On January 10, 2024, a selection committee composed of ADVA and ADMH representatives met to choose awardees to receive ARPA funds. After reaching a decision to fully fund the fifteen top-ranked proposals, ADVA and ADMH representatives discussed the intent of ADVA

for the use of the grant funds. As a result, the award decision was expanded to include the top thirty-three ranked proposals, with thirty-two proposals receiving half of the requested funding and the remainder of the funds going to the thirty-third proposal.

On January 11, 2024, the State Board of Veterans Affairs (SBVA) met and voted to approve the selection committee's thirty-three selected proposals. The vote took place in a bloc manner and did not allow for decisions on whether individual proposals (or parts thereof) would be funded. During the SBVA meeting, there was discussion of the selection committee's decision the previous day. It is unknown to DOF which members of the SBVA took part in the discussion with the selection committee the previous day or what was discussed that resulted in the pool of awardees being expanded from fifteen to thirty-three.

In addition, it is unknown to DOF whether any of the SBVA members who recused themselves from voting at the SBVA meeting were a part of the ADVA group that took part in the selection committee discussion the previous day that changed the committee's recommendation to thirty-three awards. Following the January 11, 2024, SBVA meeting, SBVA sent notices to each entity that submitted a proposal informing the entity of whether they were selected for funding and the amount of funding (if selected).

On March 12, 2024, the ADVA inquired with the DOF on whether ARPA funds could be distributed in a lump sum once contracts were completed with the awardees. While funds can be distributed in a lump sum, the inquiry raised concerns at the DOF due to the requirement in the agreement between the DOF and the ADVA that the ARPA funds be obligated no later than June 1, 2024. The DOF began requesting status updates from the ADVA on the progress of the agreements between ADVA/ADMH and the grant recipients and the DOF offered to draft a template agreement.

On April 2, 2024, the DOF was informed that the ADMH was terminating their agreement with ADVA and would no longer administer the ARPA programs. In the ADMH termination notice to ADVA, there are a number of concerns cited by the ADMH regarding the grant selection process. These concerns include concerns regarding one approved proposal including lobbying expenses (which the DOF previously advised the ADVA was an impermissible expense) and that communications took place with awardees stating that funding amounts could be different than what was approved by SBVA and listed in the notification of funding provided to the awardees.

On April 4, 2024, the DOF requested that the ADVA provide all of the proposals selected for ARPA funding. After a thorough review of the proposals, the DOF has significant concerns regarding many of the proposals selected for award by SBVA. The DOF's concerns with the proposals are found throughout the majority of the thirty-three awarded programs and include:

- 1) Proposals, and portions of programs, that are ineligible for ARPA funding pursuant to U.S. Treasury rules and regulations and/or state law or policy governing the use of said funds;
- 2) Proposals, and portions of programs, having no nexus to mental health services/programs;

- 3) Proposals lacking adequate data to ensure sustainability of the funded programs (e.g. creating new programs or funding part-time or undeveloped/immature programs) beyond the period for which ARPA funding can be utilized;
- 4) Proposals lacking adequate data to determine whether eligible portions of the proposed programs can be carried out if the ineligible portions are not funded;
- 5) Proposals lacking adequate data to determine whether the proposed programs can be carried out with partial funding; and
- 6) Proposals with an excessive use of ARPA funding for administrative costs.

A detailed account of the DOF's concerns with each of the proposals approved by the SBVA is attached.

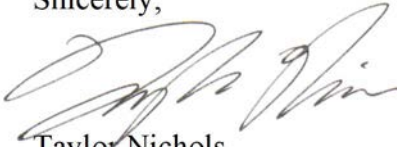
The DOF fully intends to ensure the entirety of the ARPA funding provided to the ADVA goes to the care of Alabama's veterans. However, in accordance with paragraph II.A.4. of the agreement between the DOF and the ADVA, no later than May 3, 2024, the DOF is requesting that ADVA provide the DOF with the following information in order to ensure the legal and appropriate expenditure of the funds:

- 1) A list of the members of the source selection team made up of ADMH and ADVA members that recommended the approval of the fifteen top ranked, and later the thirty-three top ranked, proposals, to include all individuals present;
- 2) A statement detailing any conversation(s) that took place between ADVA members of the source selection team that led the source selection team to change their recommendation to that of funding thirty-three proposals;
- 3) A statement detailing ADVA's response to the concerns raised by ADMH in their April 2, 2024 agreement termination notice concerning the funding of lobbying expenses and the possible change in approved funding amounts;
- 4) A statement summarizing all communications in any form that occurred between ADVA, and/or the SBVA, to recommended awardees concerning the selection of proposals or approval of funding;
- 5) An itemized statement detailing for each proposal recommended for approval of what specific proposed expenditures in the proposal is approved for funding, as well as an explanation of the provision of the ARPA Final Rule, or other Treasury Guidance, that authorizes each expenditure to be funded; and
- 6) A statement detailing what communications, if any, have been made with awardees to ensure that the proposed programs can be carried out at the proposed funding

amounts and/or without funding for any unauthorized expenditures contained in the proposals.

The requested information is required to ensure the funds provide for the care of Alabama's veterans. Considering the short timeframe with which DOF has to ensure these funds are obligated as required by ARPA, you must provide the requested information and/or alleviate the concerns of the DOF no later than May 3, 2024. Failure to do so may lead the DOF to take appropriate remedial action, including termination of the agreement between the DOF and the ADVA in accordance with paragraph III of the agreement and/or making alternate arrangements for the use of the funds.

Sincerely,

A handwritten signature in black ink, appearing to read 'Taylor Nichols', written in a cursive style.

Taylor Nichols
General Counsel

VA ARPA2 Proposal Review Notes

Awardee (In Rank Order)	Concerns
1. Council on Substance Abuse (250,000)	<ul style="list-style-type: none"> • Current mission involves multiple areas of veteran engagement • Concern program appears to be less towards providing mental health supports and instead is to provide referral and access services via already existing programs. • Considering focus, the staffing is excessive. • Marketing and advertising budget seems excessive; however, significant component of program funding is for information dissemination (kiosks, community partner outreach) • 7% admin (based on % of included salary costs)
2. Warhawgs (114,120)	<ul style="list-style-type: none"> • WarHawgs attempts to improve veterans and service member's psychological well-being through outdoor activities such as hunting, fishing, shooting, etc. Established in 2016 in Dothan. • Funds will be used specifically for the organization's adaptive outdoor recreation efforts. • 3 FTE, 2 PTE, and 12 volunteers • Budget concerns: Can we buy ammunition with ARPA funds? \$10,320 for travel • Overall concerns: Weak to nonexistent nexus to veterans' mental health.
3. Alabama Head Injury Foundation (113,753)	<ul style="list-style-type: none"> - Appears to be expanding current offerings with increased focus on teaching out veterans population - Employee costs allocations do not raise same level of concerns as this is an existing program and, when the funding expires, it is likely that employees can shift original program (staff attrition) - With reduced award amount, need to see employee costs lowered especially as compared to professional therapy service costs. Note: proposal states that staff also fill therapeutic roles. <p>Generally, seems like a good program and will be able to offer valuable services to veterans. Travel to group meetings costs (looks like mileage) and handouts are not excessive</p>

<p>4. Alabama Veterans (f/b/o Dovetail Landing) (250,000)</p>	<ul style="list-style-type: none"> - Total Revenue 22-23: \$352K w/ expenditures of \$233K (cash in/out) <ul style="list-style-type: none"> o Admin expenses 30%, fundraising 29% (higher due to new initiatives) o 0 employees (all volunteer) <ul style="list-style-type: none"> ▪ Will hire 1-4 once Dovetail is operational ▪ Dovetail has \$640K in assets - Dovetail Landing – no-cost reverse boot camp for transitioning veterans <ul style="list-style-type: none"> o Physical/mental health is one aspect of program o Also offered to active personnel planning transition o Plan is for construction of full campus o CONCERN: New program/facility currently under construction <ul style="list-style-type: none"> ▪ No data on prior operations/capabilities - Proposal lists start-up costs for mental health therapy programs such as: <ul style="list-style-type: none"> o Equine Therapy (horses, care/vet, hay/feed, trainer, saddles/equipment, accreditation) o Scuba (gear, trainer, certification) o Kayaking (kayaks, jackets, paddles) o Mountain Biking (trails, bikes, helmets, biking center) o Gardens (healing/kitchen garden, family garden) o Reflecting Pool o Community Center Counseling Floor (soundproofing, <i>therapist</i>) - NO Actual Provision of Mental Health Treatment <p>Appears to be start-up investment in long-term project with mental-health only one portion of funded program</p>
<p>5. Jacksonville State University (250,000)</p>	<ul style="list-style-type: none"> - Victory Center overseen by the Office of Institutional Research and Effectiveness <ul style="list-style-type: none"> o Counseling to veterans - New program, no prior date on success or sustainability - Funding includes additional compensation for existing employees? <ul style="list-style-type: none"> o Travel 12K - Partial funding would require JSU “to decide which parts of the model are more important than others, which will be a difficult proposition”

<p>6. Sojourn Counseling (222,207)</p>	<ul style="list-style-type: none"> - Existing 501(c)(3) non-profit organization with mission to make counseling and Microcurrent Neurofeedback (MCN) services accessible to everyone, regardless of their ability to pay; four full-time counselors plus five part-time staff - Not previously focused on veterans, so it appears this grant will allow them to expand into that arena - In operation since 2012 with 2023 budget of \$549k - Admin expenses at 85% (likely not being defined/calculated correctly, based on the budget chart provided) - Jefferson County, Cullman County, Autauga County, Walker County, and St. Clair County - Plans to offer \$298,900 in free MCN services and \$93,296 in free mental health counseling; expects to impact 75 Veterans each week. <ul style="list-style-type: none"> - Plan to buy and operate a van for \$229k, plus \$50k marketing (including a wrap for the van)
<p>7. Veterans Recovery Resources (250,000)</p>	<ul style="list-style-type: none"> - Intends to utilize funding to provide services for Veterans and families experiencing the plethora of mental health and substance use issues as direct results from the COVID pandemic and the ongoing Opioid Crisis through three crucial integrated aspects of long-term recovery: Outpatient Treatment, Detox & Residential Treatment, and Community Integration. - Well-established program since 2015 in Mobile. <p>Budget concerns:</p> <ul style="list-style-type: none"> \$76,49.91 (23%) in fringe benefits which is not allowable per DOF policy 10% admin costs \$12,000 in travel expenses
<p>8. Gadsden State Community College (250,000)</p>	<ul style="list-style-type: none"> - Veterans Upward Bound and Educational Opportunity Center <ul style="list-style-type: none"> o To “discover” mental health needs of veterans o Emotional Support for Alabama Veterans, lessen PTSD <ul style="list-style-type: none"> ▪ Free MH services to vets and families through therapy, group therapy and community referrals ▪ New program <ul style="list-style-type: none"> • No other funding determined, currently searching • If partial funding, budget revisions will be submitted

	<ul style="list-style-type: none"> ○ Budget includes Program Coordinator (55K), 5 Therapists (250K), salaries, supplies, training, veteran care fund (30K) <p>Sustainability w/out identified outside funding?</p>
9. Southern Alabama AHEC (250,000)	<ul style="list-style-type: none"> - Proposal focuses on suicide prevention with significant focus on weapon safety - Social media and traditional outreach campaigns, mental health community training, reduce access to lethal weapons (gun locks and family resources), suicide/mental health screenings, and outreach to communities and primary care providers - Allocation of personnel appears appropriate; however, all services are contracted out to AHEC, etc. - Proposed 10% admin - If AHEC can provide all these services, why not just fund them for statewide program?
10. Forging A Difference (248,518)	<ul style="list-style-type: none"> - Forging A Difference, Inc. proposes to utilize funding to use Blacksmithing to creatively address mental health issues among the veteran community. Funding will sustain the program for 2 years. - Existing, part-time program that they want to mature into a full-time program. - Baldwin and Mobile Counties. - Fees for participants. <p>Budget concerns: Roughly 35% of the budget is salaries, including fringe benefits Rent and Insurance account for roughly 10% of budget Positive note—only 5% dedicated to admin costs.</p> <p>Sustainability is of some concern. Also, not a conventional approach to mental health counseling and/or treatment, so pushes the boundaries of allowability.</p>
11. SpectraCare Health Systems (250,000)	<ul style="list-style-type: none"> - Entity in operation since 1968 in Barbour, Dale, Geneva, Henry, and Houston Counties; FKA Wiregrass Mental Health Board; 270 fulltime and 66 part-time employees; FY22 budget of \$22.4m - 19% admin costs across the organization - ADMH awarded \$234k in ARPA funds in FY22; 700 active duty/vets/families served under that program; have received an additional \$832k in ARPA funds for other projects - Operates one of the 6 behavioral health crisis centers in Alabama; \$7m appropriation <p>No concern over sustainability relative to other proposals</p>

	<ul style="list-style-type: none"> - Asking for \$500k to serve 400 veterans; will deliver mental health services to veterans and their family members through a mobile clinic (\$260k) designed to offer on-site clinical treatment in rural areas; includes training for clinicians; will employ two new FTEs - Services will be free for those without insurance, but insured will be billed through their plans
<p>12. Veteran Impact Services (240,731)</p>	<ul style="list-style-type: none"> - Operates in Alabama as Operation Combat Bikesaver - Not seeing a direct nexus to mental health <ul style="list-style-type: none"> o Hot Rod Therapy: motorcycles o Lima Charlie: veteran peer group (does not need specific funding) o Blaster: vehicle repair and replacement options for veterans o On Your Feet: financial assistance in crisis o Return to Wind Therapy: assistance to terminally ill veterans o JAM: musical therapeutics (instruments and sound equipment) o FAT: physical fitness and mental health o Get Lost: nature based programs for mental health
<p>13. Bondfire Ranch (44,500)</p>	<ul style="list-style-type: none"> - Total annual budget \$18K (\$107K with VA grant – funded at ½) - 44% admin expenses w/grant, hiring horse trainer/instructor <ul style="list-style-type: none"> o Programs free - 2 full time employees, 5 part time employees - In operation since May 2022 - Collaborating with SOS on integrating resiliency? - Program: Cowboy Boot Camp – new initiative, equine-based mental health <ul style="list-style-type: none"> o Primary objectives: equine safety, health and wellness, grooming, equine behavior, basic groundwork skills, importance of groundwork, leading with respect, lunging, moving away, farm/ranch management - Funds to construct 60 x 120 pole barn with power/water <ul style="list-style-type: none"> o Would the reduced funding impact their ability to build the barn, which enables the proposed programs? <p>Do not see other proposed allowable expenses in their budget other than those above</p>
<p>14. University of South Alabama (219,791)</p>	<ul style="list-style-type: none"> - \$453k in prior ARPA funding; requesting \$439k - Funding would go to USA's s Office of Veteran Affairs (OVA); operated for 30 years; currently has 3 staff plus 7 work-study students; specializes in veteran benefits

	<p>Funding would allow OVA to expand into mental health services; campus has MH services, but not specific to vets</p> <p>Includes two new FTEs including benefits, plus renovation of office space (\$42k)</p> <p>Limited to students, faculty, and staff on campus; estimated reach of 300</p>
<p>15. Faulkner University (250,000)</p>	<ul style="list-style-type: none"> - Faulkner intends to utilize funding to expand its existing Center for Therapy and Research for veterans and their families to receive mental health counseling services, in person and via telehealth. - Specifically, Faulkner intends to add an additional site to be known as The Faulkner Mental Health Center specifically for mental health services by expanding into what is currently a nail salon located immediately next door to the Center for Therapy and Research (the 2,400 sq. ft. addition will come available in early 2025). The funds from this grant would cover the cost of renovation, furnishing, personnel capital and operating expenses for the period of 1 year. <p>Budget concerns:</p> <ul style="list-style-type: none"> Renovations and furnishings account for \$223,100 of the request, or nearly one-half. \$176,900 is budgeted for salaries of an occupational therapist and psych/counselor. \$31,900 of this is for fringe benefits which DOF will not allow by policy. \$13,500 is budgeted for travel <ul style="list-style-type: none"> - No veterans program currently exists and it appears the grant funds will be used to create one in order to expand Faulkner’s existing therapy center as evidenced by the fact that ½ of the requested amount will be spent on renovating a space they intend to purchase/acquire in 2025. - Sustainability is a real concern.
<p>16. Family Counseling Center of Mobile (250,000)</p>	<p>Well established organization with significant annual budget and staffing</p> <p>Applicant Programs:</p> <p>Financial counseling – NOT ARPA or Act 2023-1 eligible</p> <p>211 referrals</p> <p>Direct Services</p> <p>10% proposed admin</p> <p>Personnel and operating expenses excessive and some not allowed (furniture)</p> <p>Susan: concerned that bulk of funding not going to services</p>

<p>17. Veterans 4 Veterans (248,803)</p>	<ul style="list-style-type: none"> - Proposal focused on suicide prevention - Organization does not provide mental health treatment <p>Proposed use of award:</p> <ul style="list-style-type: none"> - Public education - request \$240k for 20 3-day workshops for individuals likely to encounter family or community member in a suicidal crisis - Suicide intervention – request \$257k for suicide regiment search and rescue (vehicles, rental space, staff, S&R equipment) <p>Seems excessive for the geographic area covered and the service to be provided</p>
<p>18. Wings Across Alabama (111,000)</p>	<ul style="list-style-type: none"> - 1M FY24 receipts w/ 10& admin - Mental health organization w/ 2 full time & 12 part time employees - Operating for 8 years - New Program – Veterans Across America prioritizing women, BIPOC, children/adolescents, LGBTQ, rural, elderly <ul style="list-style-type: none"> ○ Web-based program for non-crisis peer support services for daily mental health challenges before they develop to crisis ○ Current program has 15 regular attendees, looking to scale up to 5K <p>Budget: 20K travel, fringe benefits 20K, direct/indirect?</p>
<p>19. Institute for Social Science Research at the University of Alabama (250,000)</p>	<ul style="list-style-type: none"> - Expansion of an existing academic program with clearly established goals and focus; clear timeline of implementation and expected outcomes - Existing program with established staff, designed for criminal justice-involved veterans with TBI; project funds would be used to employ a TBI screener and a TBI navigator - Frequently references “research” including data collections for TBI studies - TBI studies have clear nexus to mental health - Aims to reach 600 vets annually - Fringe benefits included, 31% for faculty, 35.7% for staff - Admin costs capped at 15%
<p>20. Auburn University (247,853)</p>	<ul style="list-style-type: none"> - Operation Grow for Beginning Veteran Farmers <ul style="list-style-type: none"> ○ To improve self-employment and improve mental health of veterans ○ Objectives: Training, Networking (involves mental health), Sustainable Support ○ Mental Health nexus as small part of program?

	<ul style="list-style-type: none"> - Pilot program in 2016, revised and relaunched (in 2022) <ul style="list-style-type: none"> o Is this a new program? No. Currently serves over 100 veterans in 49 AL counties <ul style="list-style-type: none"> ▪ But no accounting of existing mental health impact - Requesting salary and travel <p>Cannot find any specific mental health expenditures in proposed budget</p>
<p>21. Americas Heroes Enjoying Recreation Outdoors (AHERO) (250,000)</p>	<ul style="list-style-type: none"> - All-volunteer board w/ 2022 revenue of \$311K/expenses \$163K <ul style="list-style-type: none"> o Admin limited to 6% - Provides veterans rural communities together to socialize and learn how to improve wildlife habitat through conservation programs <ul style="list-style-type: none"> o Screen porch therapy concept (no cost) o Program operates through AL, Georgia and Florida panhandle - Funding will allow establishment of program but partial funding (what is being done) will “impact ability to fund long-term paid positions needed to advance outreach programs . . .” <ul style="list-style-type: none"> o Start-up and Sustainability concerns - Funding Proposal (all used on programs/facilities for rural veterans at risk of suicide – IS THIS THE FRONT PORCH PROGRAM?): <ul style="list-style-type: none"> o 200K – veteran support expenses (including travel, lodging, meal costs) o 115K – transition training program expenses (firefighting and burn management courses) o 5K – volunteer travel expenses o 75K – administrative position (new hire) o 5K – facilities maintenance o 50K – SFC Burnette Cabin renovation o 50K – Maj Gen Livingston Warrior Lodge renovation
<p>22. Mother Mary Mission (140,878)</p>	<ul style="list-style-type: none"> - Female Veteran Transitional Living Facility will provide Emergency Shelter, Homelessness Prevention, Rapid Rehousing services in Lee, Macon, and Russell Counties - Facility has been operating for 7 months; total residential capacity of 24 with 12 rooms - Plan to serve average of 72 residential clients in a year, and to serve approximately 50-100 additional non-residential clients with essential services and provide financial assistances and services through homelessness prevention and rapid rehousing

	<ul style="list-style-type: none"> - Have previously received two grants totaling \$70k, requested \$282k - Budget includes \$218k for salaries and \$22k for fringe benefits
23. Drake State Community and Technical College (250,000)	<p>Funding will be used <u>to establish</u> the Eagle’s Heroes Haven. The Provider will increase access to mental health support to low-income, and minority communities while tracking veteran participants; establish a comprehensive social-emotional support program for veterans in underserved communities, fostering mental well-being, resilience, and a sense of community; and deliver free, effective counseling services.</p> <p>Budgetary concerns:</p> <ul style="list-style-type: none"> \$60,000 for “emergencies” for veteran students experiencing hardships that may prevent successful completion of programs of study. Appears to be a loan/grant program for students facing financial hardships. Not allowable. \$45,000 for real property renovations and furniture. Not allowable. \$2,000 for office supplies. Not allowable. \$15,000 for marketing/PR is excessive. \$40,000 for speaker fees and honorariums is questionable. 10% admin allocation. <ul style="list-style-type: none"> - The letters of support included in the application package state that “space is being renovated on campus to create a new Veteran’s Center, with an anticipated opening date of late spring 2024.” Why would the budget include funds for renovations? - Because no veterans’ mental health program currently exists at this location, sustainability is a real concern with this application.
24. Samsons Strength Sustainable Veterans Project (147,213)	<ul style="list-style-type: none"> - Program focuses on veteran homelessness and unemployment; NOT mental health - Includes construction of housing and equine facilities - Eligibility concerns under ARPA and 2023-1
25. Drug Education Council (250,000)	<p>Bulk of funding to be applied to a veterans-specific abatement planning module to help model best practices</p> <ul style="list-style-type: none"> - PROVIDES NO DIRECT SERVICES - Personnel costs are excessive considering funding goes largely to model provider. If there are

	<p>- Eligibility concerns: Is this a research program that does not provide services to individuals</p>
<p>26. Chattahoochee Valley Community College (250,000)</p>	<p>- Has an existing Center of Excellence for Veteran Student Success (CEVSS) and will use ARPA funds to create the CEVSS Supporting Alabama Veterans Program. The Program will provide emotional, and mental health support programs and services to better serve Alabama veterans and military-connected students and their families residing in Alabama, who experience social, emotional, and mental health issues.</p> <p>- Anticipates service 230 military-connected students and their families at no cost to the students.</p> <p>- Funding will cover two and half years of the program during which time CVCC will “continue to monitor the need for additional human and financial resources to sustain the comprehensive functions of the” program.</p> <p>Concerns with budget:</p> <p>Hiring of a project admin assistant at approx. \$30,000 per year for years 1 and 2, and \$15,000 for year 3. Cost includes fringe benefits which DOF has consistently disallowed WRT ARPA funds.</p> <p>\$10,000 will be used to train the admin assistant to run the program—this is due to the fact that the program is being created with this funding and is not an existing or established program.</p> <p>More than 80% of the project budget is for contractual counseling, telehealth services, and awareness events.</p> <p>Overall, sustainability is highly questionable. Funding is to create a program, not to assist an existing program impacted by COVID.</p>
<p>27. Veterans Memorial Park Association (239,459)</p>	<p>Project proposes to 1) build an outdoor park, 2) recruit mental health professionals to use the park, 3) ???</p> <p>Park (233 acres in Etowah County) has been owned since 1947 but is undeveloped; established a 501(c)19 governing board in 2022</p> <p>Park board has never had ARPA funding or any other funding</p> <p>No employees and plans to do all admin work for this project on volunteer basis</p>

	<p>Almost all of the funds go to capital projects within the park; remaining costs are for equipment such as Gator 4x4 and chainsaws</p>
<p>28. Auburn Student Veterans Association (249,024)</p>	<p>ASVA’s annual budget in 2023 was \$98,300 and \$48,000 in 2022. Grant/ARPA funds to be used for operational expenses related to Operation Iron Ruck (OIR) which is designed to raise awareness and prevention of veteran suicide. COVID nexus is minimal at best, but not nonexistent.</p> <p>OIR total cost by year: 2023-\$10,561.20 2022-\$5,841.94 2021-\$4,698.10</p> <p>The largest donation in OIR’s history is \$5,000. Given the total costs over the last three years, and considering the largest donation in history is \$5,000, an award of nearly \$250,000 seems very excessive</p> <ul style="list-style-type: none"> - Specific budget items that are concerning: - \$65,000 for full-time coordinator – no current employees and with a 2023 budget of \$98,000, this full-time position is not sustainable as required by the Final Rule \$4,000 for TV Advertising Campaign, \$9,750 for Marketing Firm, and \$2,500 for digital advertising—all three not sustainable and not enough nexus to covid prevention, mitigation, and treatment \$15,000 for travel expenses—DOF has consistently treated payroll as a reimbursable expense, but not other employment-related benefits. Said benefits are hard to track and are high risk for fraud, waste, and abuse. I would classify travel expenses in this instance as ineligible. \$10,000 for custom vehicle wrapping—this is advertising in a different form. Not sustainable and no COVID nexus.
<p>29. Visualize Everyone That Serves (250,000)</p>	<ul style="list-style-type: none"> - “Our vision is to create gardens in suburban and urban communities with an emphasis on memorial gardens that honor veterans” - “VETS requests \$500,000 to build a greenhouse for youth agriculture training and mentor program delivered by veterans in the Africatown community in Mobile, AL” <p>Would produce fresh fruits and vegetables for 77 families, 40% of whom are veterans</p>

	<p>Five year-old organization, less than \$20k annual budget, no paid employees; have restored 8 homes and performed 2k hours of community service in underserved minority communities ADVA awarded \$250k</p>
<p>30. Krulak Marine Alliance of Alabama (14,375)</p>	<p>Krulak Marine Alliance of Alabama intends to utilize funding to support their ongoing efforts to prevent veteran suicide. These efforts include printed materials for distribution as well as online information sources. Additionally, Provider intends explore adding to their efforts with new informational and promotional products. Awarded \$14,375. Annual budget is \$30,000; have no employees Suicide prevention initiatives include digital and tangible promotional materials such as the 1) Spare a Life informational kit; 2) Vet Force Multiplier digital suicide prevention online portal; and the 3) Prevail suicide prevention card deck (which uses suggestive messaging on each playing card). Overall concerns: This program prints materials and distributes them, but there is no way to measure outcomes or successes. Budget concerns: \$3,500 requested for “New Product Development”</p> <p>Proposal states that they will exclude admin and travel costs and will not use ARPA funding for these purposes.</p>
<p>31. Alabama Council of Chapters – Military Officers Association of America (250,000)</p>	<p>\$150,000 for “advocacy” which seems to be thinly disguised lobbying No direct services Community Outreach Grant Program: Plans to split up \$130,000 among 13 different suborganizations for a wide variety of direct services including “housing, food assistance, employment, health (including behavioral health), family support, community reintegration, financial assistance, legal assistance, transportation, and crisis relief.” Would reach approximately 200 veterans. Outreach, Peer Support and Transportation: Plans to split up \$170,000 among various Veterans Service Organizations which would provide direct services to approx. 1500 veterans. Would spend \$50,000 on grant admin/compliance, or 10% of total grant</p>

	<p>On p. 10, the budget appears to be for “Vets Recover” which is another VA ARPA grant applicant; it appears that Vets Recover and this application are supported by the same individual</p>
<p>32. Shelton State Community College (245,312)</p>	<ul style="list-style-type: none"> - In partnership with VA Hospital in Tuscaloosa for HERO PATH program - Pair veterans with mentors for skill building - New program, hiring/publication/marketing to begin after funds provided - “Emergency funds will be made available to any family member or military cohort member who is enrolled in non-credit or for-credit training with SSCC. <ul style="list-style-type: none"> o What does this mean? Is this providing funding to veterans directly? <p>No details of impact of partial funding - “funding amounts will affect programming”</p>
<p>33. Selah Christian Counseling and Wellness (72,465)</p>	<p>Currently in first year of operation; have a “sister organization” that is for-profit, Warrior Wellness Group LLC, operating since 2017</p> <p>No grant funding in the past two years, requested \$500k, awarded \$71k</p> <p>Would hire 2 full-time and 3 part-time employees: 1 full-time mental health counselor, 1 chaplain, 1 part-time mental health counselor, 1 part-time clinical director/grant facilitator, 1 part-time admin asst.</p> <p>Significant concerns about sustainability</p> <p>35% admin costs (\$97k annually)</p> <p>Plan to hire a chaplain at \$54k annually</p> <p>Plan to rent billboard space at \$15k annually</p> <p>Focused on Jefferson, Chilton, Shelby counties</p>