

LIMESTONE COUNTY COMMISSION

Athens, Alabama

NON-GOVERNMENTAL ENTITY APPROPRIATION APPLICATION POLICY AND PROCEDURE

Policy No. FIN-2026-01

Adopted: July 6, 2026 | Effective: July 6, 2026 | Review Cycle: Annual

Issuing Authority:	Limestone County Commission
Administered By:	County Administrator, in coordination with the CFO and County Attorney
Legal Authority:	Ala. Code § 11-3-11; § 11-8-3; § 11-8-8; Ala. Const. Art. IV, § 94; Alabama Ethics Law (Ala. Code § 36-25-1 et seq.)
Applies To:	All non-governmental entities requesting a County appropriation, grant, or monetary contribution from Limestone County general funds

I. PURPOSE AND POLICY STATEMENT

The Limestone County Commission (the "Commission") is charged with the responsible stewardship of public funds on behalf of the citizens of Limestone County, Alabama. In certain circumstances, the Commission may determine that an appropriation of County funds to a qualifying non-governmental entity advances a legitimate public purpose consistent with the County's mission and authority under applicable Alabama law.

This policy establishes a uniform, transparent, and accountable process for receiving, reviewing, and acting upon requests for County appropriations from non-governmental entities, including nonprofit organizations. It is the policy of Limestone County that no appropriation of public funds to a private or non-governmental entity shall be made except pursuant to the requirements and procedures set forth herein, and only upon a finding by the Commission that such appropriation serves a public purpose benefiting the residents of Limestone County.

II. SCOPE AND APPLICABILITY

A. Entities Covered

This policy applies to all requests for a monetary appropriation, contribution, donation, grant, or financial assistance from the general funds or any discretionary funds of Limestone County, Alabama, made by:

- Nonprofit organizations exempt from federal income tax under Section 501(c)(3) or any other subsection of 26 U.S.C. § 501(c);
- Charitable organizations registered with the Alabama Attorney General pursuant to the Alabama Charitable Organization Registration Act (Ala. Code § 13A-9-71 et seq.);
- Civic leagues, fraternal organizations, or other non-governmental associations; and

- Any other private entity, association, or organization that is not a unit of federal, state, or local government.

B. Entities and Transactions Not Covered

This policy does not apply to the following:

- Contracts for goods and services procured pursuant to the County's purchasing policy and applicable Alabama competitive bid laws (Ala. Code § 41-16-1 et seq.);
- Intergovernmental agreements with other units of government;
- Expenditures for County operations, grant matching or related expenditures, employee compensation, or capital projects;
- Court-ordered payments; or
- Emergency disbursements authorized by the Commission by separate resolution in declared emergency circumstances.

III. DEFINITIONS

As used in this policy, the following terms have the meanings set forth below:

Applicant: Any non-governmental entity that submits a formal application for a County appropriation pursuant to this policy.

Appropriation: Any direct transfer of Limestone County public funds to a non-governmental entity, however designated, including grants, contributions, donations, subsidies, or matching funds.

Commission: The Limestone County Commission, the governing body of Limestone County, Alabama.

County Administrator: The Limestone County Commission Administrator or his or her designee.

County Attorney: The County Attorney for the Limestone County Commission or his or her designee.

CFO: The Limestone County Chief Financial Officer or designee of County Administrator.

IRS Determination Letter: The letter issued by the Internal Revenue Service confirming an organization's tax-exempt status under 26 U.S.C. § 501(c).

Nonprofit Organization: An organization that holds current tax-exempt status under 26 U.S.C. § 501(c) or is organized and operated for charitable, religious, educational, scientific, or other non-profit purposes under applicable law.

Public Purpose: A governmental or civic purpose that has a direct public benefit of a reasonably general character to a significant part of the public in the allowable discretion of the Commission, as distinguished from a remote and indirect or private benefit. The existence of a valid public purpose is a prerequisite for any County appropriation to a non-governmental entity.

Accountability Report: A post-disbursement written report submitted by a grantee documenting how County funds were expended, as required by Section VIII of this policy.

IV. ELIGIBILITY REQUIREMENTS

To be eligible to apply for a County appropriation, an entity must meet all of the following minimum criteria at the time of application and at the time of any disbursement:

A. Nonprofit or Non-Governmental Status

1. The entity must be a non-governmental organization organized and operating on a nonprofit basis;
2. The entity must hold current, valid tax-exempt status under 26 U.S.C. § 501(c), or must demonstrate that it is organized exclusively for charitable, educational, civic, or public-benefit purposes; and
3. The entity must be in good standing with the Alabama Secretary of State, if incorporated or registered in Alabama.

B. Residency and Service Area Nexus

4. The entity must primarily serve residents of Limestone County, Alabama, or must demonstrate that its proposed use of County funds will provide a direct and substantial benefit to Limestone County residents.

C. Legal Compliance

5. The entity must not be debarred, suspended, or otherwise excluded from receiving public funds by any federal, state, or local authority;
6. The entity must be current on all applicable state and local registrations and filings, including, if applicable, charitable solicitation registration with the Alabama Attorney General's Office; and
7. The entity must be in material compliance with all applicable federal, state, and local laws and regulations.

D. No Prohibited Purpose

8. The requested appropriation must not primarily benefit a private individual, inure to the benefit of private shareholders, or be used for lobbying or political campaign activities.

V. APPLICATION REQUIREMENTS

Each Applicant must submit a complete application package to the County Administrator's Office. Incomplete applications will not be processed. The application package must include all of the following:

A. Completed Application Form

9. Applicants must complete the official Limestone County Non-Governmental Appropriation Application Form, available from the County Administrator's Office or the County's official website;
10. The Application Form must be signed by an authorized officer or representative of the Applicant; and
11. The Form must include the full legal name of the organization, principal business address, telephone number, email address, website (if any), and Federal Employer Identification Number (FEIN).

B. Cover Letter

12. A cover letter on the organization's official letterhead, signed by the Chief Executive Officer, Executive Director, Board Chair, or equivalent authorized officer, summarizing the request and confirming the accuracy and completeness of all information submitted.

C. Statement of Purpose and Project Narrative

13. A detailed written statement describing:
 - The specific public purpose for which the requested funds will be used;
 - The program, project, or service to be funded;
 - The anticipated outcomes, deliverables, and measurable benefits to Limestone County residents;
 - The proposed timeline for the project or use of funds; and
 - How the requested appropriation furthers the charitable or civic mission of the organization.
14. The narrative must identify the specific population or geographic area of Limestone County to be served.

D. Itemized Budget and Requested Amount

15. A precise statement of the total dollar amount of funds requested from Limestone County;
16. An itemized budget or line-item schedule showing specifically how all requested County funds will be expended, including any allocated amounts for:
 - Personnel costs (salaries, benefits, contractors);
 - Program supplies and materials;
 - Facilities, equipment, or capital items;
 - Administrative or overhead costs (not to exceed 15% of the total appropriation without written justification and Commission approval); and
 - Any other expenditure category.
17. A statement identifying all other funding sources for the same project or program, including amounts received or anticipated, to enable the Commission to assess the proportionality of the County's contribution; and
18. If the requested funds are to supplement other funding, the Applicant must identify any matching or leveraging commitments.

TRANSPARENCY REQUIREMENT: *The Commission will not approve any appropriation in which the proposed budget does not itemize the use of County funds with reasonable specificity. Lump-sum "general operating" requests without project-specific justification are disfavored.*

E. Proof of Nonprofit or Non-Governmental Status

19. A copy of the organization's IRS Determination Letter confirming tax-exempt status under 26 U.S.C. § 501(c), issued by the Internal Revenue Service;
20. If the organization is incorporated in Alabama, a current Certificate of Existence (Certificate of Good Standing) issued by the Alabama Secretary of State within the preceding twelve (12) months;
21. If the organization is incorporated in another state and registered to do business in Alabama, evidence of foreign qualification and good standing in the state of incorporation and in Alabama;

22. The organization's most recent IRS Form 990, Form 990-EZ, or Form 990-N (e-Postcard), as applicable, for the most recently completed fiscal year; and
23. If the organization is not required to file a Form 990, a written statement explaining the basis for the exemption and an IRS Form W-9.

F. Financial Statements

24. The organization's most recent annual financial statements, which should be audited or reviewed by an independent certified public accountant (CPA) if the organization's annual revenues exceed \$250,000;
25. For organizations with annual revenues of less than \$250,000, internally prepared financial statements (including a balance sheet or statement of financial position and a statement of activities or income and expense) for the most recently completed fiscal year, signed by the Chief Financial Officer, Treasurer, or Executive Director; and
26. If the organization has not completed a full fiscal year of operations, a projected budget and any available financial records.

G. Organizational Documents

27. A current list of all officers and members of the Board of Directors or governing body, including names, titles, and contact information;
28. A copy of the organization's current bylaws; and
29. If the organization has adopted a written conflict-of-interest policy, a copy of such policy.

H. Certification of No Conflict of Interest

30. A signed Certification, executed by an authorized officer, representing that, to the best of the Applicant's knowledge, no officer, director, or employee of the Applicant has a financial interest in or a personal relationship with a Limestone County Commissioner, the County Administrator, or a County employee that would create a conflict of interest under the Alabama Ethics Law (Ala. Code § 36-25-1 et seq.); and
31. Disclosure of any such relationship or potential conflict, if applicable.

I. Prior Accountability Report (If Applicable)

32. If the Applicant has received an appropriation from Limestone County in any prior fiscal year, the Applicant must submit the Accountability Report required by Section VIII of this policy for the most recent prior appropriation before a new application will be deemed complete.

J. Compliance and Accountability Agreement

33. A signed Compliance and Accountability Agreement acknowledging the Applicant's obligations under this policy, including the requirement to submit a post-disbursement Accountability Report and to submit to audit or inspection of records upon request by the County.

VI. APPLICATION DEADLINES AND SUBMISSION PROCEDURES

A. Annual Application Window

34. The County Administrator shall establish and publish an annual application period for non-governmental appropriation requests, coinciding with the County's budget development cycle. Applications received outside the annual window will be held for consideration in the next application cycle unless the Commission, by majority vote, authorizes out-of-cycle consideration for good cause.
35. The application deadline shall be no less than thirty (30) calendar days prior to the Commission meeting at which the request is to be considered, to allow adequate time for staff review.

B. Submission

36. All applications must be submitted in both printed hard copy (one original and two copies) and electronically (via email or other method designated by the County Administrator) to:

Limestone County Commission
Attn: County Administrator
310 West Washington Street
Athens, Alabama 35611
Re: Non-Governmental Appropriation Application

37. Applications submitted by mail must be received no later than the stated deadline. Late applications will not be processed in the current cycle.

C. Completeness Review

38. Within ten (10) business days of receipt, the County Administrator shall conduct an initial completeness review to determine whether all required documents and information have been provided;
39. If an application is incomplete, the County Administrator shall provide written notice to the Applicant identifying the specific deficiencies; the Applicant shall have ten (10) business days from the date of such notice to cure identified deficiencies; and
40. If deficiencies are not timely cured, the application shall be deemed withdrawn without prejudice and the Applicant may reapply in the same cycle, if the re-application is still timely, or in a subsequent cycle.

VII. REVIEW, EVALUATION, AND COMMISSION ACTION

A. Staff Review and Recommendation

41. Upon a determination that an application is complete, the County Administrator shall forward the application to the CFO for fiscal review and shall notify the County Attorney of the pending request;
42. The CFO shall prepare a fiscal review memorandum that addresses:
 - The availability of funds in the appropriate budget category;
 - A comparison of the request to prior-year appropriations to the same entity, if applicable; and
 - Any financial concerns or flags identified in the Applicant's financial statements or Form 990.

43. The County Attorney shall review the application for legal sufficiency, including the adequacy of the public purpose showing, compliance with Ala. Const. Art. IV, § 94, and any conflict-of-interest concerns; and
44. The County Administrator shall compile the complete application, fiscal review memorandum, and legal review memorandum into a staff recommendation memorandum for Commission review.

B. Evaluation Criteria

The Commission shall consider the following criteria in evaluating appropriation requests, which are listed for guidance and are not exclusive:

- The clarity, specificity, and legitimacy of the stated public purpose;
- The degree to which the proposed use of funds will benefit residents of Limestone County;
- The financial health, transparency, and accountability track record of the Applicant;
- The amount requested relative to the County's overall budget and available discretionary funds;
- The availability of alternative funding sources and whether the County appropriation is necessary to accomplish the stated purpose;
- The Applicant's compliance history with prior County appropriation requirements, if any;
- Whether the organization is in good standing with all regulatory authorities; and
- The overall merits of the program or project to be funded.

C. Agenda Placement and Public Consideration

45. Appropriation requests that pass staff review may be placed on the agenda of a regular Commission meeting in accordance with the Limestone County Commission Rules of Procedure (November 2024), Section V;
46. All appropriation requests placed on the Commission agenda shall be made available for public inspection in accordance with the Alabama Open Meetings Act, Ala. Code § 36-25A-1 et seq., and applicable public records laws; and
47. The Applicant's authorized representative may be requested to appear before the Commission to present the application and respond to questions.

D. Commission Action

48. The Commission shall act on each appropriation request by resolution or recorded vote;
49. An appropriation shall be approved only upon a finding, stated in the approving resolution, that the appropriation serves a public purpose benefiting the residents of Limestone County;
50. The Commission may approve the requested amount, approve a modified amount, deny the request, or defer action pending submission of additional information; and
51. The County Administrator shall provide written notice of the Commission's action to the Applicant within five (5) business days of the meeting at which action is taken.

VIII. DISBURSEMENT CONDITIONS AND ACCOUNTABILITY

A. Disbursement Agreement

52. No County funds shall be disbursed to an approved Applicant until the Applicant has executed a written Disbursement and Accountability Agreement with Limestone County, prepared by the County Attorney, which shall include at minimum:
- The specific amount approved and the purpose for which funds may be used;
 - A prohibition on use of County funds for purposes other than those expressly approved by the Commission;
 - A prohibition on use of County funds for political campaign activities, lobbying, or any purpose that would violate applicable law;
 - A requirement to maintain records and documentation of all expenditures of County funds for a minimum of five (5) years;
 - A right of the County to audit, inspect, and copy the Grantee's financial records pertaining to County funds upon reasonable notice;
 - A clawback provision requiring repayment of funds used for purposes inconsistent with the approved purpose; and
 - A reporting obligation consistent with Section VIII(B) of this policy.

B. Accountability Report

53. Not later than sixty (60) calendar days after the conclusion of the funded project or program, or sixty (60) days before the end of the County's fiscal year in which funds were disbursed, whichever occurs first, the Grantee shall submit a written Accountability Report to the County Administrator's Office;
54. The Accountability Report shall include:
- A narrative description of how the funds were used and the outcomes achieved;
 - An itemized accounting of all County funds expended, organized by budget line-item;
 - Copies of supporting documentation (receipts, invoices, payroll records, etc.) for expenditures of County funds;
 - A statement of any unexpended County funds, with an explanation; and
 - Any other information requested by the County Administrator.
55. Unexpended County funds not authorized to be retained must be returned to the County within thirty (30) days of the end of the County's fiscal year in which funds were disbursed; and
56. Failure to submit a timely Accountability Report shall disqualify the Grantee from consideration for future County appropriations until the delinquent report is received and accepted.

C. Right to Audit

57. Limestone County reserves the right, exercisable at the County's discretion and at the County's expense unless fraud or material misuse is found, to audit or inspect any Grantee's financial records relating to the use of County funds. A finding of misuse may result in demand for repayment and referral to appropriate authorities.

IX. LIMITATIONS AND PROHIBITIONS

58. No County appropriation shall be made to any entity for the primary purpose of benefiting a private individual or paying the personal expenses of any individual;
59. No County appropriation shall be used for alcoholic beverages, entertainment of a non-public nature, or any expenditure that a reasonable person would consider inconsistent with a public purpose;
60. No appropriation shall be made to an entity that advocates for or engages in discriminatory practices in violation of applicable federal or state law; and
61. Nothing in this policy shall be construed to obligate the Commission to approve any application or to create an entitlement to County funds.

X. RECORDKEEPING AND PUBLIC TRANSPARENCY

62. The County Administrator shall maintain a complete file for each appropriation application received, including the application, all supporting documents, staff review memoranda, and Commission action records;
63. All approved appropriations shall be recorded in the Commission's official minutes and shall be reflected in the County's annual budget and financial reports;
64. A summary register of all non-governmental appropriation applications received, including amounts requested, amounts approved, and Grantees, shall be made available for public inspection upon request pursuant to the Alabama Open Records Act (Ala. Code § 36-12-40 et seq.); and
65. The County shall retain all application records for a minimum of seven (7) years from the date of Commission action, consistent with applicable records retention schedules.

XI. POLICY ADMINISTRATION, REVIEW, AND AMENDMENT

66. This policy shall be administered by the County Administrator, with the assistance of the CFO and County Attorney;
67. The County Administrator is authorized to develop and maintain application forms, checklists, and procedural guidance documents consistent with this policy;
68. This policy shall be reviewed annually by the County Administrator and County Attorney, with any recommended amendments presented to the Commission for approval; and
69. This policy may be amended by majority vote of the Commission at any regular meeting, subject to the notice and agenda requirements of the Commission's Rules of Procedure.

XIII. APPLICATION CHECKLIST AND PROCESS SUMMARY

REQUIRED DOCUMENT CHECKLIST – Applicant must provide ALL items marked “Required”

DOCUMENT / ITEM	STATUS
Completed Application Form (signed)	Required
Cover Letter on Organizational Letterhead	Required
Purpose and Project Narrative	Required
Itemized Budget / Line-Item Use of Funds	Required
Amount Requested (exact dollar figure)	Required
IRS Determination Letter (501(c)(3) or other)	Required
Current Alabama Secretary of State Certificate of Existence	Required
Most Recent Annual Financial Statements (audited or reviewed preferred)	Required
Most Recent IRS Form 990 (or 990-EZ / 990-N)	Required
List of Officers and Board of Directors	Required
Federal Employer Identification Number (FEIN)	Required
DUNS / SAM.gov Registration (if applicable)	If applicable
Certification of No Conflict of Interest	Required
Prior-Year Accountability Report (if prior recipient)	If applicable
List of Other Funding Sources for Same Project	Required
Signed Compliance & Accountability Agreement	Required

APPLICATION REVIEW AND APPROVAL PROCESS SUMMARY

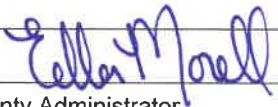
STEP	ACTION / RESPONSIBILITY
Step 1 – Obtain Application	County Administrator's Office or County website
Step 2 – Complete & Compile	Applicant assembles all required documents
Step 3 – Submit by Deadline	30 days before requested Commission meeting
Step 4 – Completeness Review	County Administrator within 10 business days
Step 5 – Staff Analysis	CFO prepares fiscal review memo; County Attorney prepares legal review memo
Step 6 – Agenda Placement	Administrator places on Commission agenda

STEP	ACTION / RESPONSIBILITY
Step 7 – Commission Action	Commission votes; resolution issued if approved
Step 8 – Disbursement	Finance Office releases funds per agreement
Step 9 – Accountability Report	Grantee submits report by sooner of 60 days of project end or 60 days before fiscal year end

XIV. ADOPTION AND CERTIFICATION

This Non-Governmental Entity Appropriation Application Policy and Procedure was duly adopted by the Limestone County Commission at a regular meeting held on the date set forth below, and shall be effective immediately upon adoption.

	7-6-26
Commission Chair, Limestone County Commission	Date of Adoption

	
County Administrator	County Attorney

END OF POLICY – Policy No. FIN-2026-01