Florida & Alabama Brownfields Conference 2022

Voluntary Cleanup Tax Credit (VCTC) Application Submission



VCTC application Submission: Does it make sense?

Yes! The VCTC Program is well defined.

- All sites must have an executed BSRA or a VCA (Lisa discussed)
- Consistent review phases
 - **Completeness** specific doc types required in every application
 - Eligibility allowable expenses (Scott will focus on this)
- Specific Tax Credit Types (Site Rehab/Solid Waste) available
 - Bonuses available for Site Rehab
- Quantifiable results



The VCTC Program is well defined

- Consistent Completeness requirements
 - (Site Rehab and Solid Waste):
 - Application Form and \$250 Non-Refundable Review Fee
 - **►** FDEP Website has VCTC Application Form & Guidance Documents
 - Documentation (BSRA/VCA, Contracts, Scope of Work, PE/PG Memo re: Prorated Costs)
 - Invoices and Proof of Payment by the Applicant
 - **■**CPA Review, Attestation & Report
 - Submitted On Time for Site Rehab and SRCO Bonus!
- Applicant = PRFBSR = Exact Entity that paid!



The VCTC Program is well defined.

- Has quantifiable results since 1998
 - 1578 Applications submitted
 - About \$139 Million awarded to local governments and corporate entities
 - Must have Florida Corporate Income Tax to use the VCTC
 - Many VCTC Certificates are sold or transferred to <u>corporate</u> entities (Sue Ellyn will talk about this)
 - This is allowed one-time per certificate issued, in 25% or more increments.



\$s and Cent\$

- ■BSRA (eligible); BF Area Designation (not eligible)
 - ▶BSRA is for the site; when did the Applicant start the work?
 - ► Executed by 12/31 allow enough time
- Rehabilitation (eligible); Redevelopment (not eligible)
- Assessment, Remediation, Closure Capping, Property Transactions, Landscaping
- Biz Transactions vs VCTC Calendar
 - ■VCTC Annually incurred by 12/31, Paid by 1/31
 - ■VCTC Solid Waste Applicant determines



The VCTC Program Summary

Tax Credit Type	% of Eligible Cost Awarded	Work Completed:	Application Submitted:
Annual Site Rehab	50% (≤\$500K)	Each December 31st	By January 31 st for the prior CY costs
SRCO Bonus	25% (≤\$500K)	When SRCO (NFA) is issued	Once: Within 1 year of SRCO issuance
Health Care/ Affordable Housing Bonus	25% (≤\$500K)	When Req's Met	Once: Applicant's Choice
Solid Waste Removal	50% (≤\$500K)	Applicant's Choice	Once: Applicant's Choice



\$s and Cent\$

- Award vs VCTC submittal cost
 - BSRA is eligible
 - Application prep/submittal & Independent CPA costs are not eligible
 - Consider:
 - If eligible costs are \$20,000, the VCTC Award is \$10,000
 - What if the App submittal & CPA costs are \$8K?
 - ► For Annual Site Rehab, remember to consider the 25% Bonuses (up to 2)!
 - First Bonus (Site Rehabilitation Completion Order [SRCO] is most common);
 - Add \$5K to the \$10K above for a total of \$15,000
 - Second Bonus (likely Health Care Facility or Affordable Housing)
 - Add another \$5K to the above for a total of \$20,000



Any Questions?

beth.walker@vctcapps.com

VCTC & Appropriation Services, LLC **850-752-2022**

