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Coronavirus / COVID-19 Response Team

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How Can I Help Now? Charitable Giving and The CARES Act Tax Incentives

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Overview of Today's Webinar

1. Philanthropy in the United States
2. Charitable Giving and Disaster Response
3. Giving During a Time of Crisis
4. CARES Act Charitable Giving Provisions
5. Paycheck Protection Program Loans
6. National Emergency Declaration
7. Employer-Provided Assistance Prior to National Emergency Declaration
8. How You Can Make a Difference

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1. Philanthropy in the United States

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Giving USA 2019

- $427.71 billion in 2018 according to Giving USA 2019: The Annual Report on Philanthropy for the Year 2018
- Includes individuals, bequests, foundations, and corporations
- Increase of .7% over 2017 giving measured in current dollars
- Adjusted for inflation, total giving declined by 1.7%

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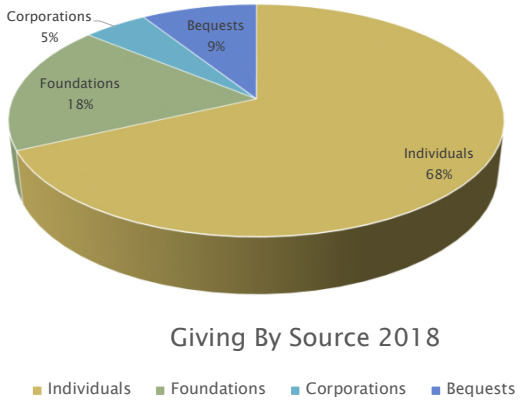
Charitable Giving by Source



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Amount of Giving By Source

- Individuals: $292.09 billion
- Private Foundations: $75.86 billion
- Corporations: $20.05 billion
- Bequests: $39.71 billion

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Origin of Charitable Deductions

- Income Tax Charitable Deduction: Revenue Act of 1917
- Estate Tax Charitable Deduction: Estate Tax Act of 1921
- Gift Tax Charitable Deduction: Gift Tax Act of 1932

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Charitable Planning

- One objective of charitable giving is to reduce taxes
- Income tax (IRC §§ 170, 642(c))
- Gift tax (IRC § 2522)
- Estate tax (IRC §2055)

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2020 Tax Rates

- 10% to 37% ordinary income brackets
- Additional .9% Medicare payroll surtax on high income earners
- 0 to 20% long-term capital gain rate
- Plus 3.8% Medicare surtax
- Estate/Gift/GST tax exemptions set at $11.52 million in 2020; marital portability allows couples to exclude $23.04 million; top rate of 40%

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Charitable Planning Objectives

- Serve the public interest
- Keep taxable income as low as possible
  - Maximize charitable deductions
  - Maximize tax-free income
  - Reduce or eliminate capital gains tax
  - Reduce or eliminate transfer taxes

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2. Charitable Giving and Disaster Response

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FEMA's Recommendations

- Cash donations are the best type of donation
- Vetted non-profit organizations supporting COVID-19 response efforts may be found at NVOAD.org
- National Voluntary Organizations Active in Disaster coordinate with HHS, FEMA, and the CDC
- Do not make unsolicited donations of material goods

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NVOAD's Recommendations

- Affiliate with existing organizations
- Communities can become overwhelmed by the number of people willing to volunteer
- By working with an existing organization, volunteers can ensure that they will be properly trained and supported
- Do not self-deploy
- Cash gifts

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State of Michigan Cash Gifts

- Monetary Donation to the Michigan COVID-19 Response and Recovery Initiative
- Supports critical services for Michiganders impacted by the pandemic
- Funds are distributed through the State Emergency Operations Center established process, based on critical needs

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State of Michigan Material Gifts

- Masks: NIOSH N95 or better
- Ventilators
- Sanitizer (Hand/Wipes)
- Gloves
- Surgical Masks (No handmade)
- Hospital Gowns
- No-Touch Thermometers
- Contact Michigan Community Service Commission at COVID19donations@michigan.gov or 517-335-4295.

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3. Giving During a Time of Crisis

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Types of Assets Used for Gifts

- Cash
- Stock
- Real Estate
- Tangible Personal Property
- Insurance
- Retirement Assets
- Business Interests

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Cash is Best in Times of Crisis

- Offers charities the most flexibility
- It costs money to store, sort, and ship gifts of material supplies
- Material gifts require charities to pull staff away from critical needs in order to sort, package, transport, store, and distribute items
- CARES Act waived charitable deduction limits for cash gifts to public charities in 2020

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Long-Term Capital Gain Property

- Appreciated stock or land held for at least a year and a day
  - Bypass capital gain
  - Deduct full fair market value of the asset
  - Gift limit is 30 percent of donor's AGI

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Why Not Short-Term Capital Gain Property?

- Short-Term Capital Gain Property is held for less than a year and a day
- Deductible at cost basis only
- 50 percent gift limit

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Securities Which Have Declined in Value

- Donor may wish to sell depreciated securities, realize the capital loss and contribute cash without regard to percentage limitations
- Capital loss may be used to offset gain on sale of appreciated assets, which could generate more cash that can be used for charitable contributions without percentage limitations

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IRA Charitable Rollover

- Age 70.5 or older
- Give up to $100,000 outright to a qualified charity each year
- Satisfies required minimum distribution (RMD) requirement (RMD suspended in 2020)
- Not included in taxable income
- No charitable deduction available
- May satisfy a previously existing pledge
- IRA rollovers are limited to public charities

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Withdrawals from IRAs in 2020?

- Take a taxable withdrawal from IRA and make cash gift to public charity, if you are over 59.5 years of age?
- Deduction without percentage limitations allows taxpayer to offset income
- Impact on taxation of Social Security benefits
- Increase in Medicare premiums
- Consult your tax and legal advisors

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Donor Advised Funds

- Very popular charitable giving vehicle
- Receive immediate charitable income tax deduction
- Recommendations for potential grant recipients can be made to DAF
- Alternative to a private foundation
- Reasonable Start Up Costs
- Opportunity to involve family in charitable giving

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DAF vs. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATION
Start-Up Costs	Minimal (often covered by sponsoring organization); no IRS application for tax exempt status required; minimal time commitment from donor	Legal and accounting fees and other start-up costs can be substantial; typically takes several weeks and months to create and obtain tax exempt status from the IRS

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DAF vs. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATION
Administrative and Management Fees	Varies with sponsoring organization and level of services; typically less than private foundations; no separate annual filings (e.g. Form 990) required; DAFs can be efficient when committing small charitable gift amounts	Varies with choice of board, and level of services required; Must file annual tax returns, conduct independent audit, manage and administer all functions

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DAF vs. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATIONS
Income Tax Deduction Limits	Gifts or cash are typically deductible up to 60 percent of AGI; Gifts of short-term capital gain property are deductible up to 50 percent of AGI; Gifts of appreciated property, held long-term, are deductible up to 30 percent of AGI	Gifts or cash are typically deductible up to 30 percent of AGI; Gifts of short-term capital gain property are deductible up to 30 percent of AGI; Gifts of long-term capital gain property are deductible up to 20 percent of AGI; Gifts of "qualified appreciated stock" are deductible up to 20 percent of AGI

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DAF vs. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATION
Excise Taxes	The DAF, unlike a private foundation, is exempt from excise taxes	Annual excise tax of 1 to 2 percent of net investment income

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DAF vs. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATION
Value for Deduction Purposes	Cash is deductible at face value; Short-term capital gain property is deductible at its cost basis; Long-term capital gain property is deductible at FMV	Cash is deductible at face value; Short-term capital gain is deductible at its cost basis; Gifts of appreciated real estate and privately-held stock are limited to the donor's cost basis; Gifts of long-term capital gain property, in general, are deductible at cost basis; Gifts of "qualified appreciated stock" are deductible at FMV

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DAF v. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATION
Control	The DAF must retain the right to control the donated property; the donor may recommend charities as potential grant recipients; the DAF may override the donor's recommendation as to the timing and recipient of any grant; the DAF must retain control of the donated property, including the right to sell and invest any proceeds	Trustees or Directors control and manage activities and investments of the foundation

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DAF vs. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATION
Required Payout	No required minimum charity distributions	Must distribute the "minimum investment return," which is 5 percent of the excess of the aggregate fair market value of the foundation's assets other than those which are used directly in carrying out its exempt purpose, over any acquisition indebtedness with respect to those assets

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DAF vs. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATION
Privacy	Opportunity to remain anonymous; tax filings are not public documents; grants to ultimate charity may remain anonymous; a DAF is not required to disclose a list of its contributors	Must file detailed and public tax returns on grants, investment fees, trustee fees, staff salaries, etc.

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DAF vs. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATION
Governance	Donor(s) may name advisors to recommend grants and investments; Donors may also name successors to the account, and ensure a continuing legacy; opportunity to educate family members about philanthropy by authorizing them to recommend grants from the donor's account	Opportunities for board selection, training and bringing in the next generation are greater; opportunity for family participation and legacy; satisfaction of family goals and desires; no restrictions regarding who may serve on the board

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DAF vs. Private Foundation

	DONOR ADVISED FUND	PRIVATE FOUNDATION
Term	Can exist in perpetuity	Can exist in perpetuity

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Charitable Lead Annuity Trust

- Tax efficient charitable vehicle used to transfer property to children
- Typically funded with a combination of publicly traded stocks and real estate
- Assets are frozen on date of transfer to trust
- To the extent trust assets appreciate in excess of Sec. 7520 rate, wealth is shifted free of transfer tax
- Gift and/or income tax deduction

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Charitable Lead Annuity Trust

- Lead income interest paid to charity
- Upon expiration of lead interest term, assets are transferred to children
- CLATs are very attractive during periods of low interest rates
- Low Sec. 7520 rate provides for a larger charitable tax deduction for CLAT
- Excellent vehicle for leveraging lifetime exemption

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Early Termination of a Charitable Remainder Unitrust

- With a CRUT, the donor has made an irrevocable gift of the remainder interest, but has retained the income interest
- If the donor then transfers the income interest to the vested remainder recipient, the charity then owns the remainder and the income interest
- A charitable deduction is available for the gift of the income interest

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Irrevocable Assignment of Charitable Gift Annuity to Charity

- Through a signed and dated writing, the annuitant may transfer the contract back to the charity
- Some annuitants no longer need annuity payments and desire a charitable deduction
- After the annuitant irrevocably assigns the annuity contract to the charity, the charity has no further obligation to make annuity payments

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Annual Exclusion Gifts

- $15,000 per year, per individual gift recipient
- Married couples may give $30,000 per year, per individual gift recipient
- No charitable deduction allowed

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Educational and Medical Exclusion Gifts

- Unlimited exclusion for tuition paid directly to an educational institution
- Payments qualifying for the educational exclusion are limited to tuition, and do not cover room and board
- Gift exclusion for payments to health care providers
- No charitable deduction allowed

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4. CARES Act: Charitable Giving Tax Incentives

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Charities Needed Now More Than Ever

- The Coronavirus Aid, Relief, and Economic Security (CARES) Act signed into law by the President on March 27, 2020
- National Council of Nonprofits reports that our nation has over 1.3 million nonprofits
- Half of nonprofits have just one month of cash reserves
- Includes provisions to encourage charitable giving now when giving is most needed

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New Above the Line Charitable Deduction

- Taxpayers who do not itemize deductions are able to deduct up to $300 for certain charitable gifts in 2020
- The gift must be made in cash to a public charity
- Married couples are able to deduct up to $600 for cash gifts
- Reduce the donor-taxpayer's adjusted gross income (AGI), which in turn reduces taxable income

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New Above Line Charitable Deduction

- Not available for gifts to donor advised funds (DAFs), supporting organizations, or private foundations
- Only available for cash gifts made in 2020
- Not available for cash deductions carried forward from prior years

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Increased Percentage Limitation on Cash Gifts for Individuals

- Eliminates the Code § 170 percentage limitation on most cash gifts to public charities
- Prior to the adoption of the CARES Act, donors making cash gifts to public charities were able to deduct up to 60 percent of adjusted gross income (AGI)

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Increased Percentage Limitation on Cash Gifts for Individuals

- The 100 percent of AGI limit does not apply to carry-over deductions from prior years
- If a contribution is in excess of a donor's AGI, the excess may be carried over to subsequent years, but will be subject to the percentage limitations in place in the carryover years
- The 100 percent AGI limit is not available for gifts to donor advised funds, private foundations, or supporting organizations

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Increased Percentage Limitation on Cash Gifts from Corporations

- Under prior law, charitable contributions made by corporations could not exceed 10 percent of taxable income
- The limit on cash contributions to public charities from corporations for 2020 purposes has been increased from 10 percent to 25 percent of taxable income
- Does not apply to private foundations, supporting organizations, or donor advised funds (DAFs)

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Suspension of RMD Requirements and Impact on Charitable Giving

- Suspends required minimum distributions (RMD) from most qualified retirement plans, including IRAs
- May reduce the incentive for taxpayers to make qualified charitable distributions (QCDs) from their IRAs in 2020
- Nonetheless, the IRA charitable rollover remains available in 2020 for taxpayers who choose to make qualified charitable distributions (QCDs)

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5. Paycheck Protection Program Loans

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Paycheck Protection Program Loans

- Sec. 501(c)(3) organizations generally qualify.
- Covers eight weeks of payroll, benefits, rent, or mortgage interest and utilities
- Potential forgiveness of loan
- Policy purpose behind the PPP Loans is to prevent layoffs
- Nonprofits with significant endowments or reserves likely will not qualify

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Qualification Requirements

- Issued under the Small Business Administration (SBA) Sec. 7(a) program
- 501(c)(3) organization must have 500 or fewer employees
- Must have paid employees on February 15, 2020
- Nonprofits with multiple related organizations may be subject to the SBA affiliation standards under 13. C.F.R. § 121.103

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Qualification Requirements: Faith Based Organizations

- SBA Faith-Based Organizations FAQ
- Published in response to questions regarding the SBA affiliation standards for the funding of payroll for religious entities
- Affiliation with other entities of similar faith will not violate the SBA affiliation standards
- Specimen religious organization statement is included as an exhibit to SBA Faith-Based Organizations FAQ

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Nonprofit "Shall Make a Good Faith Certification"

1. that the uncertainty of current economic conditions makes necessary the loan request to support the ongoing operations of the eligible recipient
2. acknowledging that the funds will be used to retain workers and maintain payroll or make mortgage payments, lease payments, and utility payments
3. that the eligible recipient does not have an application pending for a loan under this subsection for the same purpose or duplicative of amounts applied for or received under a covered loan, and

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Nonprofit "Shall Make a Good Faith Certification"

4. during the period beginning on February 15, 2020 and ending on December 31, 2020, that the eligible recipient has not received amounts under this subsection for the same purpose and duplicative amounts applied for or received under a covered loan

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PPP: First Come, First Served Basis

- On April 16, 2020, the SBA reported that 1,636,000 loan applications valued at over $339 billion have been approved
- Congress allocated $349 billion to the PPP
- SBA has indicated that it has stopped accepting claims based on available appropriations funding
- Lawmakers are currently negotiating a path forward to allocate more funds to the program

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6. National Emergency Declaration

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Tax-Favored Financial Assistance to Employees

- On March 13, 2020, the President declared a national emergency under the Robert T. Stafford Disaster Relief and Emergency Assistance Act
- Gives employers a means to provide tax-free financial assistance to employees who are affected, directly or indirectly, by COVID-19
- Preserves the employer's ability to deduct the payments of financial assistance

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"Qualified Disaster Relief Payments"

- Any amount paid to reimburse or pay reasonable and necessary personal, family, living or funeral expenses (not otherwise compensated by insurance) incurred because of a "qualified disaster"
- "Qualified disaster" includes a federally declared disaster or emergency under the Stafford Act; COVID-19 is a "qualified disaster" under Section 139 of the Code

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Employers May Provide Tax-Free Financial Assistance

- Under Section 139, employers may provide direct financial assistance to employees affected by a qualified disaster
- Assistance not treated as income/wages
- Employer may deduct payments as ordinary and necessary business expenses
- No ceiling on amount; must be "reasonable and necessary;" must not be for an expense reimbursable by the employee's insurance

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Emergency Funds Designated as Private Foundations

- Employer-sponsored Emergency Funds designated as private foundations may now provide assistance to employees without adverse tax consequences
- Payments by the private foundation, if properly made and documented, will not be treated as acts of self-dealing under Section 4941 or taxable expenditures under Section 4945

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Donor-Advised Fund Administered by an Independent Public Charity

- Employers may not want to establish a charitable organization for qualified disasters
- Donor-Advised Funds may not generally make grants to individuals
- Exception exists for funds or accounts established specifically to benefit employees and their family members who are victims of a qualified disaster

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Donor-Advised Fund Administered by an Independent Public Charity

- Requirements for employer-sponsored donor-advised fund to be able to give directly to employees:
  - 1) Fund must serve the single identified purpose of providing relief from one or more qualified disasters
  - 2) Must serve a "broad and indefinite" charitable class

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Donor-Advised Fund Administered by an Independent Public Charity

- 3) Recipients of donations must be selected based on an objective determination of need. Selections must be made by:
  - (a) using an independent person or group, or
  - (b) establishing adequate substitute procedures to ensure that any benefit to the employer is incidental and tenuous

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Donor-Advised Fund Administered by an Independent Public Charity

- 4) No payment may be made from the fund to or for the benefit of any director, officer, or trustee of the sponsoring community foundation or public charity, or any person who is selecting recipients
- 5) The fund must maintain adequate records to demonstrate the recipients' need for the disaster assistance provided

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7. Employer-Provided Assistance Prior to National Emergency Declaration

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Taxable Payments to Employees

- Employers may continue to pay employees affected by COVID-19 in the form of taxable wages and other distributions
- Payments are taxable income/wages to the recipient
- Employer withholds taxes

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Employee Emergency Financial Assistance Funds

- Some larger employers have established 501(c)(3) charitable organizations to provide emergency disaster and/or financial hardship assistance to employees facing unexpected financial emergencies
- If the Emergency Fund receives significant support from the employees as opposed to the employer, it may be classified as a public charity

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Employee Emergency Financial Assistance Funds

- The Emergency Fund may provide financial assistance to any employee who experiences a qualifying financial hardship
- Cannot simply be wage replacement
- The Emergency Fund must make determinations of individual financial need for each affected employee
- If administered properly, payments should be treated as tax-free to the employees

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8. How You Can Make a Difference

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COVID-19 Response Funds

- Contact charities and inquire about COVID-19 Response Funds
  - Hospital Foundations
  - Community Foundations
  - Faith Based Organizations
  - Food Pantries
  - Homeless Shelters
  - Funds for First Responders
    - Health care workers, EMTs, paramedics, firefighters, police officers, local government officials

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Volunteer Opportunities

- Qualified Health Professionals are needed to supplement Michigan's current hospital capacity
- Individuals with a background in public health and health care fields may be able to volunteer to assist with contact tracing
- Register at mivolunteerregistry.org

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Donate Blood

- Healthy donors are needed to ensure an adequate blood supply
- Donor centers and community blood drives across the State of Michigan remain open because of the critical nature of blood donation to our country
- Individuals are allowed to leave their residence to donate blood

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Slow the Spread of Covid-19

- Stay home
- Practice Social Distancing
- Wash your hands often
- Avoid touching your eyes, nose and mouth
- Clean and disinfect household surfaces
- Cover your coughs and sneezes

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