REQUEST FOR INFORMATION

MULTISTATE REGISTRATION & FILING PORTAL

On **March 15, 2016**, MRFP, Inc. hosted an open conference call to provide additional background information about the project and answer any questions from the public. Additionally, interested parties were permitted to submit questions about the RFI in writing until **March 16, 2016**.

RESPONSES TO QUESTIONS

Will changes in law be needed to make the single filing portal fully efficient?

The project is not contingent upon changes in law. However, the pilot states are being strongly encouraged to make changes to their statutes as necessary to allow their participation and reduce the amount of data that will need to be collected from users of the charities filing portal.

Is there going to be a system requirement for registrants from pilot states to use the Single Portal, or will we allow registrants to submit registration either thru state-specific system or the Single Portal?

Initially registrants will have the option to file through the charities portal or directly with the states. Making this optional will enable us to proceed more quickly and to get feedback from users before launching a permanent solution.. State laws would need to be changed in order to make filing through the charities filing portal the only filing option.

Will customers be able to use a third-party preparer?

As is already the case in many states, we will allow third-party preparers to enter data into the system for a client through a special type of login credential. We anticipate that the system will allow a third-party preparer to submit data on behalf of a charity.

There are so many different States that have different requirements for what needs to be submitted along with your registration forms, how is the committee proposing to unify those differences, and make it consistent for those different requirements? How will we handle different state requirements?

The states participating in the Single Portal Pilot project have had a series of bi-weekly "data mapping" calls to map out each state's data requirements for registration and or renewal of registrations where applicable. Customers will need to provide all data necessary in every state it selects, which is why the pilot states are working to consolidate their requirements as much as possible. We are also hoping that the right design can make it easier for registrants to answer only the questions they have to.

RESPONSES TO QUESTIONS (CONTINUED)

How would registered agent come into play, receiving legal documentation?

The charities filing portal will collect registered agent information in the same manner as required by each pilot state.

What is going to be the system of record?

This will be up to each pilot state to determine. Some states may choose to access the data directly from the charities filing portal, while others may choose to download the data from the portal and integrate into their own databases, which will be their system of record.

What will data resolution look like?

We did not understand this question.

How will you manage expectations that you have that this Portal will help us in determining in which state we must register? How would an organization know what states to register in?

Having a single website will also provide a single stop location from which to offer such guidance, which is greatly in demand. Technology, such as an expert system, can also help registrants to get these questions answered more quickly. Although not in scope for this RFI, we may want, in due course, to integrate FAQs, Q&As and expert systems to help streamline the process of providing guidance. Charities may still need legal counsel where the statutory requirements are vague or ambiguous, but customers could complete a short questionnaire and be presented with a list of states that would require them to register or allow them to apply for an exemption based on their answers. We have yet not determined whether this process will be iterative and confined to pilot states, or cover all 39 states plus D.C.. We would prefer to offer the latter service.

How much of the personal information required for charity registration would be made public? Social Security number, date of birth, residential addresses of the organization's officers and directors, bank account information, conviction records of officers, etc.

Each state's statutes would govern this disclosure. For example, if Colorado were to download residential address information and integrate it into its own database, that information would not be disclosed on the Colorado website. Consolidation of these rules in solicitation statutes would be very helpful, but each state has slightly different open records law. Most states already redact personally identifiable information.

RESPONSES TO QUESTIONS (CONTINUED)

If a vendor was selected and there was a data breach, would MRFP take all legal responsibility regarding the breach or would this potentially fall on the vendor?

MRFP, Inc. will take every precaution to design a secure system. The question is both legal and contractual and will need to be negotiated with the vendor.

What are the anticipated fees for this service? Would there be both a “convenience fee” for filing using the portal as another “convenience fee for” using a credit card which would be necessitated by filing online?

As indicated in the RFI, we are interested in transaction-based funding model, in which a single, modest convenience fee would be charged.

Aren’t some of the states participating in the project legally required to use their own state’s payment portals and systems?

Each pilot state must be able to receive its fees from the single filing portal.

How is payment anticipated to work?

We are seeking recommendations for achieving 100% PCI SCC compliance in payment processing through the RFI. We would like customers to be able to make a single payment at the portal to cover all filing and transaction fees, and the portal must be able to distribute fees to each pilot state and process refunds accurately. Refunds may need to be handled by each pilot state independent of the portal.

Regarding payment could there be a prepaid account option similar to those employed by Colorado?

This is a feature that we would be open to, if it’s feasible.

What are the expectations for the site availability? Does the site need to be able to handle large volumes of people logging in at one time prior to a filing deadline?

Yes, the website would need to be available as close to 24/7 as possible, with an acceptable response time during peak filing periods and fairly minimal scheduled down time. The initial pilot will help us to determine the number of anticipate parallel users.

RESPONSES TO QUESTIONS (CONTINUED)

You mentioned that a data mapping project is underway.   In so far as several terms such as "fundraiser," "contribution," "related organization," "solicit," fundraising counsel," "related party," etc. have very different meanings in different states, how is the data mapping project handling this? Is it an anticipated that there will be a single question "do you have a professional fundraiser" which a charity can answer (even if not answered legally correctly in some states), or is the expectation that the organization will answer questions about fundraisers for each separate state. A similar question applies to fundraisers, solicitors, and commercial co-venturers that perform work in some but not all states (e.g. even organizers).

Customers must have access to thorough guidance throughout the e-filing process, so instructions pertaining to terminology and particular line items will be a key feature. FAQs, instructions, and questionnaires will address these differences in meaning. In addition, part of the data mapping process will endeavor to reconcile terminology and vocabulary, where possible.

Could this system also analyze which charities likely should be registering, but are not and let those organizations know about the registration requirement?

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For Missouri, will the system only need to handle required filings such as 501(c)(4)'s or will it need to handle voluntary check-a-charity filings as well?

Both

Would there need to be "digital signatures" in this system, and if so, how many? Could paid preparers be listed as the form signers who digitally sign?

Each pilot state will need to determine how many signature it needs and consider whether one signature would suffice. Currently one or more states require two signatures. Some states requires that the signer be an officer of the organization. Our expectation is that the system will provide a third-party preparer login that would enable data entry and sufficient notification, but would not include signing privileges.

RESPONSES TO QUESTIONS (CONTINUED)

For states which have laws with requirements for notarized forms, how is it proposed that this be met using an online filing system?

Pilot states will be strongly encouraged to remove requirements for notarized signatures.

What are the criteria for moving forward to the RFP phase?

The MRFP, Inc. has not committed to moving to an RFP. That decision will in part be informed by the information collected through this RFI.

Would the MRFP consider a more aggressive pilot/implementation timeline?

Yes; however, MRFP, Inc. is committed to the principle of iterative development with ample customer input informing each new phase of development.

If you can get agreement from everyone to take ACH credit payment and an electronic reconciliation file that will make things much easier for each state and any vendor involved.

We welcome further discussion regarding this suggestion.

Just a quick question after looking at the data fields. I noticed that payment information fields are on the fields list. Does that mean the agencies keep the payment information or is it that they accept the payment information fields for payment purposes only?

We strongly prefer a payment processing solution that does not require retention of payment information.

Does MRFP plan on taking any action to gain access to the IRS API? We understand that the IRS plans to release Form 990 data but has not yet done so.

MRFP Inc. intends to allow for collection of digitized Form 990 data from the IRS or other possible sources. But, because MRFP, Inc. is committed to the principle of iterative development, we do not anticipate delaying development to wait for any IRS API.