

GUIDE TO GRANTS



STRENGTHENING THE VOICES OF CASA STATEWIDE

Updated June 2021

Texas CASA
Grants Management



Contents

Organization of This Guide. The Guide to Grants is organized along the grant lifecycle. To use this guide digitally, click on the page number for the topic you are interested in. Click on the links on the right side for additional information and resources.

The Guide as a Pointer System. This guide does not provide every rule or policy that governs your grant. It is meant to provide information about the most common issues and to point you to other source documentation that will allow you to develop a deeper understanding.

Links not working? From Adobe Acrobat, select *Edit, Preferences, Trust Manager*, and adjust your setting to allow Acrobat to reach Internet sites or adjust your custom settings to allow the blocked sites.

- Grants Management Overview & Staff	3
- Fund Sources	4
- Application Timeline	7
1. AWARD	
- Grants Department	9
- Getting Started	10
- Conditions of Funding	11
- Rules & Guidance	12
- Grant Officials: Roles	13
- Grant Authorized Signers	14
2. REPORT	
- Requests for Reimbursement (RFR)	16
- Direct Reimbursements	17
- Performance Reporting	18
3. MANAGE	
- Financial Management	20
- Board-approved Operating Budget	21
- Unallowable Costs	22
- Matching Contributions	23
- Budget Cost Allocation	24
- Personnel	25
- Time & Activity Documentation	26
- Contracts for Professional Services	27
- Equipment	28
- Travel for Child Visits & Staff Training	30
- Supplies & Direct Operating Expenses	31
- Budget Revision Requests	32
4. MONITOR	
- Monitoring by Texas CASA	34
- Grantee Monitoring	35
- Annual Audit Reports	36
- Fraud, Waste & Abuse	37
- Reducing Risk	38
5. CLOSE	
- Closing the Grant	40
- Records Retention	41

Grants Management Overview & Staff

The Grants Management Department of Texas CASA administers state, federal and private grant funds that are passed through to the local CASA programs.

Grants Management personnel manage these grant funds; including handling monthly Reimbursement (RFRs) from local programs; making monthly, quarterly and annual reports to our various funding agencies; conducting grant application reviews; managing grant formulas; and conducting grants compliance monitoring.

In addition, the staff conducts an annual grant application/grant management workshop, conducts reviews of each program's internal controls through our Internal Control Questionnaire, and is responsible for the receipt and review of the annual independent audits required from each local CASA program. Staff also reviews each local program's timesheets, payroll records and travel documentation at least one time randomly during the grant fiscal year for CVC and VOCA funding.

The Grants Management Department includes the following persons:

Tamea Byrd.....Chief Grants Management Officer

Mary Hightower.....Senior Grants Management Specialist (CVC and CVC Growth)

Brandi Goen.....Grants Management Specialist II (VOCA)

Benita Pekkattil.....Grants Management Specialist I (VOCA Direct Reimbursements, VOCA Courtesy, Swalm, Title IV-E (PSVT), and License Plate)

Fund Sources

Texas CASA administers approximately \$33.5 million in pass-through grant funds. The primary funding sources are as follows:

Victims of Crime Act (VOCA). Federal funds that Texas CASA has received since 2004 as a block grant from the Texas Governor's Office, Criminal Justice Division (CJD). The Victims of Crime Act of 1984 is the federal government's principle means of providing support for programs that serve victims of all types of crime. Each year, federal criminal fines, forfeitures and special assessments are deposited into the Crime Victims Fund. A portion of these funds, as determined by Congress, are allocated to all states on a population-based formula. An estimated \$17.9 million will be distributed to local programs in FY 2022. Texas CASA receives a VOCA grant from CJD and passes through to the local programs based on a formula of a \$50,000 base amount, \$3,000 per outlying county, 45% share of the balance of funds of total children served and 45% share of the balance of funds of the number of active/assigned volunteers, and last, 5% of the balance of funds for each program with 80% compliance with the Volunteer to Case Ratio (VCR). *See side reference bar for more VOCA formula information.*

VOCA funds must be used primarily for direct services to child victims. Local programs use VOCA funds for personnel, travel, training, equipment, contractual and direct operating expenses (such as supplies, rent, utilities, communications, etc.).



References

[VOCA Funding Formula](#)

Fund Sources (Continued)

Crime Victims Compensation (CVC). These are state funds that Texas CASA receives as an appropriation by the state legislature through the Health and Human Services Commission (HHSC). Our appropriation is both CVC funds and General Revenue (GR). An estimated \$13.3 million will be distributed in FY 2022 directly to the local CASA programs that have been in operation more than six months. This will be distributed by our CVC formula based on the number of children served with volunteer advocates and includes a base of \$25,000 for each eligible program. In addition, multi-county funds are distributed to those programs serving two or more counties. A flat \$3,000 is allocated per outlying county.

Local programs primarily use CVC funds for personnel, travel, training, equipment, contractual, supplies and direct operating expenses.

Additional CVC Growth Funds. (\$1.75 million) are available and may be applied for on a competitive basis by submitting a separate CVC growth application for programs that want to increase their number of children served with volunteers, establish or maintain satellite offices and increase racial and ethnic diversity of volunteer advocates.

Swalm Endowment. Private foundation funds that Texas CASA received as an endowment several years ago. Part of the funds earned from this endowment are distributed to local programs as determined by staff and the Texas CASA Board of Directors. We will administer approximately \$300,000 in Swalm monies during FY 2022. These funds have been used for such projects as volunteer recruitment and public awareness, technical assistance for programs in need and model/innovative projects that can be replicated within the CASA network.



References

[CVC Funding Formula](#)

Fund Sources (Continued)

License Plate (LP). This is a state fund that Texas CASA receives based on the number of CASA license plates sold in each county. This is a grant initiative where Texas CASA is sharing half of the funds received with the local CASA program based on the number of plates registered in the area. Local programs are able to use their funds for any expense that is currently allowable under the CVC funding guidelines. The license plate amount is usually a small amount of money for rural programs with some counties not receiving any. There is a one-time request for reimbursement of these funds, usually in July or August.

Title IV-E (PSVT). Through the federal grant program Title IV-E, Texas CASA has a grant agreement with the Texas Department of Family and Protective Services (DFPS) to provide additional federal funding to programs based on their CVC expenses incurred for pre-service volunteer advocate training. Local programs are required to identify these expenses in their CVC grant budgets and then report them on their monthly RFRs. The programs must use these reimbursements for outside training and conferences for staff, volunteers and/or board members or for contracting with outside contractors for in-service training.



References

[CASA License Plate Flyer](#)

[Do I want to
participate in Title
IV-E \(PSVT\) funds?](#)

Application Timeline

CVC Application. Each program will receive an automated award letter when the CVC grant applications are loaded onto Texas CASA’s Online Data Manager (ODM). The first letter goes out for CVC usually in late June or early July, and it will list your program’s award amount and the application due date, and provide a link to the ODM.

CVC Growth Application (Optional). If a program is eligible and decides to apply for the additional CVC growth funds, they will first need to submit the regular CVC application for approval and obtain contract signatures. The CVC growth application is due a week later than the regular CVC application; therefore, it’s important to submit early in order to leave enough time to finish the growth application. See the side bar reference to read the request for proposals about program eligibility and also to see the conditions associated with receiving a growth fund award.

VOCA Application. Each program will receive an automated award letter when the VOCA grant applications are loaded onto the ODM. The award letter goes out for VOCA usually in mid-July.

References

[CVC Growth Funds Request for Proposals](#)

[CVC Growth Fund Award Conditions](#)



1. Award



Grants Department

Contact Information. Each grant has a staff member who is assigned as the grant manager. This person is responsible for oversight of your grant project and can help you with your questions and other needs. We recommend that you contact your grant manager directly for specific questions about your grant.

Contact Information	
Texas CASA Main Telephone	(512) 473-2627
Toll-Free Telephone	(844) 230-6467
Mailing Address	1501 W. Anderson Lane, Suite B-2 Austin, TX 78757
Tamea Byrd	tbyrd@texascasa.org
Mary Hightower	mhightower@texascasa.org
Brandi Goen	bgoen@texascasa.org
Benita Pekkattil	bpekkattil@texascasa.org
Grants Department Email	grants@texascasa.org

Getting Started

Award Notification. Each local CASA program's Executive Director will receive an email announcing their program's formula award amount, instructions where to access the application on the Online Data Manager (ODM) and the application due date.

Application and Budget. The grant application and budget should be completed and submitted by the specified due date. The completed application will be sent to the Executive Director for signature via a DocuSign email from the assigned grant manager. The due date is posted in the award letter and listed on the application itself.

Contract and Assurances. Once the application has been approved the grant manager will generate a contract and assurances to be sent via DocuSign for signature by the Executive Director, Board President, Board Treasurer and Texas CASA CEO. The grant officials should review the contract and assurances before signing.

Obligating Funds. Once you receive an award and accept it, you may begin obligating funds on your project start date, but not before. We cannot reimburse expenses obligated before the grant start date, nor can we reimburse expenses incurred after the grant end date.

Final VOCA RFR note: Only expenses incurred on or before September 30, can be included on the final RFR. Some of the invoices are not paid until October, but if the expense was incurred in September, it should go on the September RFR and not October. The same concept applies to the final CVC RFR in August.



References

- [1 TAC §3.11, Grant and Supplemental Award Acceptance](#)
- [1 TAC §3.2503, Obligating Funds](#)



Tools

- [ODM User Guide](#)

Conditions of Funding

Special Conditions. Texas CASA may place special conditions on your grant award prior to or during the project period beyond those in the Standard Conditions. They are listed in the Texas CASA grant contracts.

Risk-based Conditions. When Texas CASA finds that a risk exists because a grantee has not submitted required information or has not complied with any applicable statute, rule, regulation, guideline or requirement, we may place a condition of funding on the grant, which may include a financial hold on funds.

Non-profit Bonds. Each nonprofit corporation receiving funds must obtain and have on file a blanket fidelity bond that indemnifies Texas CASA against the loss and theft of the entire amount of grant funds, both VOCA and CVC combined. The cost of the bond is an eligible expense of the grant.



References

[1 TAC §3.2001, Conditions of Funding](#)

[1 TAC §3.2515,](#)

[Bonding Standard](#)

[Conditions](#)

Rules & Guidance

Rules

The following are three sets of rules that apply to all grants, whether from a state or a federal funding source. In the event that any of these rules conflict, the more restrictive rule applies.

- **Texas Administrative Code (TAC).** The TAC includes regulations issued by the State of Texas. Title I, Part I, Chapter 3 of the TAC specifically applies to the Criminal Justice Division (CJD) in the Office of the Governor.
- **Uniform Grant Management Standards (UGMS).** The Texas State Comptroller's Office issues UGMS. It applies to all grants, funded with state funds, issued by state agencies.
- **Uniform Administrative Requirements, Cost Principles and Audit Requirements.** Found in the Code of Federal Regulations, these rules were issued by the White House Office of Management and Budget. CJD adopts these rules for all federally funded grants. Throughout the Guide to Grants, these rules are referred to as 2 CFR 200.

Guidance

In addition to the rules, the **DOJ Financial Guide (VOCA)** - Issued by the Office of Justice Programs, US Department of Justice, is applicable to Texas CASA grantees receiving federal pass-through funds originating from the US Department of Justice and offers more in-depth information on common issues in grants and financial management.



References

[Texas Administrative Code](#)

[UGMS](#)

[2 CFR 200](#)

[DOJ Grants Financial Guide](#)

Grant Officials: Roles

Each grant must have a project director, financial officer and authorized official. No person can serve in more than one of these roles.

The **Authorized Official** is usually President or Chairman of a nonprofit board. They are authorized by the governing body of the organization to:

- Certify the grant contract and amendments.

The **Executive Director** is an employee of the grantee agency, who is responsible for:

- Applying for, accepting, rejecting, altering or terminating the grant;
- The day-to-day operations of the project; and
- Required programmatic reporting.

The **Financial Official** must be the chief financial officer (Treasurer of the Board for the grantee agency). This person must be either an employee or a Board member. They are responsible for:

- Maintaining financial records to account for all grant expenditures; and
- Certifying contracts, request for reimbursements and budget revision requests.*

Programs should always keep their contact information and grant officials up to date on the Accounts page of the ODM. Please notify Texas CASA of any agency name changes.



References

[1 TAC §3.2501, Grant Officials](#)

Grant Authorized Signers

Grant Officials <i>Who signs what?</i>	Executive Director	Board Treasurer	Board President
Certify a Grant Application	✓		
Certify a Grant Contract	✓	✓	✓
Certify a Budget Revision Request*	✓	✓	
Certify an RFR (Request for Reimbursement)*		✓	

References

[1 TAC §3.2501, Grant Officials](#)

*The Board Treasurer may designate an alternate to certify or sign budget revisions and monthly requests for reimbursements. The alternate can be a CASA agency staff person, **but cannot be the same person who creates the budget revision or monthly RFRs**. In order to maintain proper internal controls, Texas CASA must review and approve any alternate Board Treasurer level signer designee.

2. Report



Requests for Reimbursement (RFR)

Monthly Requirement. Requests for reimbursements are submitted monthly.

Contents. An RFR reflects the cumulative expenditures from the start date of the grant through the period being reported. All expenditures must be supported by an approved budget line item in the Online Data Manager (ODM).

Method. See ODM User Guide under references.

DUE DATES

CVC – 5th business day of the month.

VOCA – 15th of the month.

Direct Reimbursements – 15th of the month.

License Plate (LP) – One-time annual submission late summer.

If there is a holiday or weekend, the due date will be the next business day.



References

[1 TAC §3.2507, Financial Status Reports](#)

[2 CFR §200.327, Financial reporting](#)

[UGMS, Part III, Subpart C, .41 Financial Reporting](#)

[ODM User Guide](#)

[Direct Deposit Authorization](#)

[RFR Timelines](#)

Direct Reimbursements

Direct Grants. Direct grants are funds set aside for a specific purpose such as volunteer travel and background checks. The total statewide award amount is determined at the beginning of the grant year, and funds are available for programs to request from until exhausted. Requests are processed on a first-come, first-served basis. Participation is optional.

Monthly RFR Requirement. Requests for Reimbursement can be submitted at any point, but should be submitted on a monthly basis. Requests for Reimbursements are processed on a monthly basis.

Method. See ODM User Guide under references.



References

[ODM User Guide](#)

[VOCA Grant Funds FBC
Background Checks](#)

[VOCA Grant Funds Volunteer
Mileage Reimbursement](#)

Performance Reporting

Requirement. Grantees must report quarterly their progress in meeting the goals, objectives and measures of their grant. (1 TAC§3.2527)

VOCA Progress Reports. Local Programs are required to submit quarterly progress reports to the Governor's office [here](#).

CVC Performance Measure Reports. The CVC performance measures are entered on the Online Data Manager (ODM) – see Accounts page.



References

[TAC §3.2527, Grantee Reports](#)

[UGMS, Part III, Subpart C, 40. Monitoring and reporting program performance](#)

[CFR §200.328\(a\), Monitoring and reporting program performance](#)

[CFR §200.331\(d\), Requirements for pass-through agencies](#)

[ODM User Guide](#)

[CVC Performance Data and VOCA Progress Report Due Dates](#)

3. Manage



Financial Management

A local CASA program's internal financial management system and practices, including documentation, must:

- **Identify Awards.** The system must identify, in its accounts, all grant awards received and expended as well as the source and application of funds for grant-funded activities. These records must contain information pertaining to awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest; and be supported by source documentation. The accounting systems of all recipients and sub-recipients must ensure that agency funds are not commingled with funds from other federal or private agencies.
- **Report.** The system must be sufficient to provide for accurate, current and complete disclosure of the grant's financial results; prepare required monthly RFRs; and trace funds to a level of expenditures adequate to establish that the funds have been used according to the rules and requirements of the grant.
- **Exercise Controls.** The system must enforce effective control over, and accountability for, all funds, property and other assets. It must also adequately safeguard all assets and assure that they are used solely for authorized purposes.
- **Manage Budget.** The system must provide for comparison of expenditures with budget amounts for each grant and include written procedures for determining the eligibility of costs.



References

[2 CFR §200.302, Financial management](#)

[2 CFR §200.303, Internal controls](#)

[UGMS, Part III, Subpart B, .13
Determination of Financial
Management System Adequacy](#)

[DOJ Grants Financial Guide, 2.3
Standards for Financial
management Systems](#)

[Model Internal Controls](#)

[Petty Cash Sample](#)

Board-approved Operating Budget

Board-approved Agency Operating Budget. Each program must provide their board-approved operating budget on the ODM Accounts page. Umbrella agencies will need to fill in two budgets, one for their overall agency and one for the CASA portion. The Operating budget should be broken down by funding source and expense category. The operating budget is due by November 30 of each grant period, but may be filled out sooner.



References

[ODM User Guide](#)

Unallowable Costs

The Request for Applications for each grant program may set out additional unallowable costs. However, there are some costs that are never allowed:

- Supplanting or the use of grant funds to replace any other existing federal, state or local funds
- Inherently religious activities such as prayer, worship, religious instruction or proselytization
- Promotional gifts
- Any salary or compensation for an elected or appointed city, county or state government official
- Construction/Remodeling
- Food and Entertainment (food excluding per diem for overnight travel)
- Corporate formation
- Entertainment
- Fines and penalties
- Credit card fees
- Tips
- Contributions or donations
- General government expenses
- Idle facilities
- Contingency line items
- Goods or services for personal use
- Mortgage payments
- Compensation for federal personnel
- Prepaid credit, debit or store cards
- Membership dues for individuals
- Vehicles or equipment for government agencies that are for general agency use
- Costs incurred outside the project period
- Bonuses and overtime
- Lobbying
- Fundraising
- Alcoholic beverages and related costs
- Counseling, housing and other child direct services as listed in the Texas CASA Standards 7.E.6.b-c.

References

[DOJ Grants Financial Guide, 3.11 Unallowable Costs](#)

[UGMS, Part II, Attachment B, Selected Items of Cost](#)

[2 CFR 200, Subpart E, General Provisions for Selected Items of Cost](#)

[CVC Eligible & Ineligible Types of Expenses](#)

[VOCA Allowable & Unallowable Costs](#)



Matching Contributions (VOCA Only)

Guaranteed Match. VOCA requires 20% matching funds toward the total project cost on a grant. The grantee must ensure that it possesses or can acquire the required matching funds.

Cash Match Expenditures. Matching funds are considered grant funds and may only be used for eligible, approved budget items. State funds, such as CVC, can be used as cash match.

In-kind Contributions. If a program allows for in-kind contributions, the fair market value of goods and services must be documented and, to the extent feasible, supported by the same methods otherwise used by the grantee agency. Either the grantee or third parties may make in-kind contributions. Many programs prefer to use the value of volunteer hours as in-kind match, over cash match which requires using hard cash. Texas CASA allows \$24 per hour for rural/smaller programs and \$26 per hour for all others.

Applicable Rules and Policies. Matching funds are part of the overall total project budget. As a result, all rules and policies that apply to the Texas CASA award amount also apply to the matching funds. This policy applies to both the required match and any voluntary overmatch.



References

[1 TAC §3.73, Matching Funds Policy](#)

[2 CFR §200.306, Cost Sharing or Matching](#)

[UGMS, Part III, Subpart C, .24, Matching or cost sharing.](#)

Budget Cost Allocation

Programs should use a best practice cost allocation method when building their grant budgets. The two most common cost allocation methods are full time employee (FTE allocation) and proportional revenue stream allocation. See an example of each below.

Full-Time Equivalent (FTE) Allocation Example.

The FTE Allocation method uses personnel to divvy up shared costs. In the example on the right, the organization has 10 employees; 5 are fully funded by VOCA, 4 are fully funded by CVC, and 1 is funded through United Way. Using the FTE Allocation method, we will determine how to allocate monthly rent of \$1,000.

Grant Name	VOCA	CVC	United Way	Total
FTEs Funded	5	4	1	10
Percent of Total	50%	40%	10%	100%
Use the same percentages to allocate cost:				
Grant Name	VOCA	CVC	United Way	Total
Percent of Total	50%	40%	10%	100%
Rent Allocation	\$ 500	\$ 400	\$ 100	\$ 1,000

Revenue Stream Allocation Example.

The Revenue Stream Allocation method uses proportional components of total revenue to divvy up shared costs. In the example on the right, the organization receives \$300,000 in total revenue; \$100,000 from the VOCA Grant, \$50,000 from the CVC Grant, \$75,000 from a United Way grant, and \$75,000 in unrestricted fundraising. Using the Revenue Stream Allocation method, we will determine how to allocate total audit fees of \$10,000.

Grant Name	VOCA	CVC	United Way	Unrestricted	Total
Revenue	\$ 100,000	\$ 50,000	\$ 75,000	\$ 75,000	\$ 300,000
Percent of Total	33%	17%	25%	25%	100%
Use the same percentages to allocate cost:					
Grant Name	VOCA	CVC	United Way	Unrestricted	Total
Percent of Total	33%	17%	25%	25%	100%
Audit Allocation	\$ 3,333	\$ 1,667	\$ 2,500	\$ 2,500	\$ 10,000

Personnel

Salary & Fringe Benefits

Salary Level. Compensation for grant-funded employees must be comparable to that of non-grant-funded employees performing similar work duties.

Leave. The cost of fringe benefits in the form of regular compensation paid to employees during periods of authorized absences from the job, such as for annual leave, family-related leave, sick leave, holidays, court leave, military leave, administrative leave, and other similar benefits, are allowable if all of the following criteria are met:

- 1) They are provided under established written leave policies;
- 2) The costs are equitably allocated to all related activities, including Federal awards; and,
- 3) The accounting basis (cash or accrual) selected for costing each type of leave is consistently followed by the non-Federal entity or specified grouping of employees

Unallowable Cost. Texas CASA will not pay bonuses or overtime pay or any portion of the salary of, or any other compensation for, an elected or appointed city, county or state government official.

Fringe Benefits

Fringe benefits are allowances provided by employers to their employees as compensation in addition to regular salaries and wages. Fringe benefits include: the costs of leave, employer contributions for social security and payroll taxes, employee life, health insurance premiums, unemployment and workers' compensation. The costs are to the extent that the benefits are reasonable and are required by law, or an established policy of the agency.

References

[Budget Cost Allocations](#)

[1 TAC §3.75, Personnel](#)

[2 CFR § 200.430, Compensation—Personal Services](#)

[UGMS, Part II, Attachment B, 11. Compensation for personnel services](#)

[DOJ Grants Financial Guide, 3.9 Allowable Costs](#)

Budget Tip:

Fringe percent applied to the grant must be equal to or less than the associated salary percent.

Time & Activity Documentation

Determination of Costs. Personnel costs must be based on records that accurately reflect the work performed and comply with the established policies and practices of the organization.

Internal Controls. Charges must be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable and properly allocated.

100% on a Single Grant. Employees working solely (100% of their time) on a single grant must periodically certify that the employee worked solely on that grant project. Note: In addition to the periodic certifications, nonexempt employees must also maintain time sheets indicating the total number of hours worked each day.

Less than 100% on a Single Grant. If an employee works on a grant but also on other duties or a separate grant, in addition to time sheets, the employee must keep activity reports that reflect actual time worked on each grant or source of funds. These reports should be developed at least monthly.

Documentation. All time and activity reports (timesheets) must be signed by the employee, and a supervisory official having firsthand knowledge of the work performed and the documentation must be incorporated into the grantee's official records. Staff paid under CVC and VOCA grants must maintain timesheets that are prescribed by Texas CASA. Volunteers report time either on timesheets, a contact log or online software.



References

[1 TAC §3.75, Personnel](#)

[2 CFR § 200.430, Compensation—
Personal Services](#)

[UGMS, Part II, Attachment B, 11.
Compensation for personnel
services](#)

Forms

[Volunteer Contact Log](#)

[Volunteer Timesheet](#)

[Sample Staff Timesheet](#)

Contracts for Professional Services

Professional services generally are obtained by contract from external sources. Some examples are accounting, auditing, trainers and bookkeeping. Audits must be in accordance with state regulations.

Contract Management. Grantees must have in place a contract administration system to consistently ensure that contract deliverables are being provided as specified in the contracts.

Contract Monitoring. Part of the contract administration includes contract monitoring. The general premise of contract monitoring is how you ensure that you get what you are paying for. A monitoring plan should include who will perform the monitoring, what will be monitored, the frequency of monitoring, documentation that will be maintained to prove monitoring was conducted, and the location of the documentation. The plan may provide general statements that contract monitoring will be conducted, who is responsible for the monitoring, that checklists or specific monitoring requirements will be developed for each contract, and where the documentation resides. When this type of monitoring plan is developed, the plan should include an example of each checklist that will be used. Please note that monitoring is more than confirming the invoice is correct.

Procurement. Grantees must use established procurement policies that are in line with state and federal law and regulation for purchase of goods and services.



References

[1 TAC §3.77, Professional and Contractual Services](#)

[1 TAC §3.2013, Pre-Approval Requirements for Procurement](#)

[2 CFR 200, Subpart D, Post Award Requirements, Procurement Standards](#)

[DOJ Grants Financial Guide, 3.9 Allowable Costs](#)



Equipment

Definition. The state defines equipment as tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit cost of \$5,000 or more, or less if the grantee chooses to capitalize items costing less. Equipment and furniture must be thoroughly justified as essential to the operations of the grant project.

All computer hardware and software must be classified as equipment regardless of cost. Other items having a unit cost at or below \$500 need not be classified as equipment unless the applicant intends to record them as capital assets.

State-controlled Assets. The following items valued between \$500 and \$4,999.99 are designated by the Texas Comptroller as controlled assets within the State Property Accounting guidance and must be maintained within the grantee's inventory records: sound systems and other audio equipment; cameras; TVs; video players/recorders; desktop or laptop computers; data projectors; and smartphones, tablets and other handheld devices.

Pre-approval. Texas CASA must approve, in advance, each piece of equipment to be purchased under a grant either through the original grant award or subsequent grant adjustment.

Use. Equipment must be used by the grantee in the program or project for which it was acquired as long as needed, whether or not the program or project continues to be supported by grant funds. When no longer needed for the original program or project, the equipment may be used in other activities supported by the awarding agency.

References

[1 TAC §3.2509, Equipment Inventory Reports](#)

[1 TAC §3.81, Equipment](#)

[2 CFR §200.33, Equipment](#)

[2 CFR §200.439, Equipment and other capital expenditures](#)

[2 CFR §200.313, Equipment](#)

[UGMS, Part II, Attachment B, 20, Equipment and other capital expenditures](#)

[UGMS, Part III, Subpart C .32 Equipment](#)

[State Comptroller's Controlled Assets List](#)

[DOJ Grants Financial Guide, 3.9 Allowable Costs](#)

Equipment (Continued)

Inventory and Disposition. The state requires each grantee to maintain on file a current inventory report of all equipment and state-controlled assets (as defined above) purchased with grant funds during the grant period. This report must reconcile with the approved grant budget and the final financial status report. The grantee needs not maintain an inventory of tangible items that do not meet the definition of equipment even if they are commonly referred to as “equipment.”

Property Records. Texas CASA requires each grantee to maintain on file a current inventory report as well as property records for all equipment and state-controlled assets (as defined above) purchased with grant funds during the grant period. The grantee needs not maintain an inventory of tangible items that do not meet the definition of equipment even if they are commonly referred to as “equipment.” The following elements must be included within the property record’s description of the property: serial number or other ID number, source of funding (including grant award number), who holds title, acquisition date, cost of property, percentage of the property’s cost paid with grant funds, location, use and condition, and disposition data (including date of disposal and sale price).

Physical Inventory. A physical inventory of the property must be taken and the results reconciled with the property records as least once every two years.

Control System and Maintenance. A control system must be developed to ensure adequate safeguards to prevent loss, damage or theft of the property. Any loss, damage or theft must be investigated. Adequate maintenance procedures must be developed to keep the property in good condition.

References

- [1 TAC §3.2509, Equipment Inventory Reports](#)
- [3 TAC §3.81, Equipment](#)
- [4 CFR §200.33, Equipment](#)
- [2 CFR §200.439, Equipment and other capital expenditures](#)
- [2 CFR §200.313, Equipment](#)
- [UGMS, Part II, Attachment B, 20, Equipment and other capital expenditures](#)
- [UGMS, Part III, Subpart C .32 Equipment](#)
- [State Comptroller’s Controlled Assets List](#)
- [DOJ Grants Financial Guide, 3.9 Allowable Costs](#)

Forms

- [Property Inventory Control Log](#)

Travel for Child Visits & Staff Training

Travel Policy. Grant funds used for travel expenses must be limited to the grantee's agency's established mileage, per diem, and lodging policies, not to exceed State travel guidelines. If a grantee does not have such policies, then the grantee must use the State of Texas travel guidelines. Keep the following policies in mind:

- Travel expenses must be directly related to the purpose of the grant.
- Allowable travel includes: travel within the service area by staff and volunteers of the grant project to coordinate activities, including court-appointed special advocacy and travel (in-state or out-of-state) by staff and volunteers of the grant project to obtain training in the skills of providing court appointed special advocacy. Costs are strictly limited to per diem, lodging, airfare and mileage (or rental car, whichever is more cost effective).
- You must select the lowest comparable air rate. We will not reimburse for business or first-class travel.

Training Courses. Grantees must maintain records that properly document the completion of all grant-funded training courses.



References

[State Travel Guidelines](#)

[1 TAC §3.79, Travel and Training](#)

[2 CFR §200.472, Training and Education Costs](#)

[2 CFR §200.474, Travel Costs](#)

[UGMS, II, Attachment B, 42, Training](#)

[UGMS, II, Attachment B, 43, Travel costs](#)

[DOJ Grants Financial Guide, 3.9 Allowable Costs](#)



Budget Tip:

Categorize training and conference **registration fees** under direct operating in your grant budgets.

Supplies

Supplies. Includes office supplies, postage, training supplies and printing of materials (e.g. brochures) that describe available services and how to obtain them.

Direct Operating Expenses

Direct Operating Expenses. This budget category includes registration fees for conference/training; building rent; utilities; telephone service; building and property insurance (CVC only); janitorial service; copying; copy lease; equipment maintenance; minor building maintenance; grounds maintenance; fidelity bonds; advertising for the purpose of recruiting staff or volunteers or soliciting bids by suppliers; production costs for public service announcements; yellow page listings; non personal memberships and literature for child victims recovery purposes; security deposits; training for employee development; professional liability insurance (includes automobile liability for CVC only); Directors and Officers (D&O) insurance; employee counseling service (CVC only), employee information publications and related expenses incurred in accordance with a governmental unit's policy; subscriptions to business, professional and technical periodicals; and copyright fees.



References

[1 TAC §3.83, Supplies and Direct Operating Expenses](#)

[2 CFR §200.94, Supplies](#)

[UGMS, Part II, Attachment B, Selected Items of Cost](#)

[DOJ Grants Financial Guide, 3.9 Allowable Costs](#)

Budget Revision Requests

Initiating a Notification. The Executive Director may submit requests for grant adjustments, to be signed by the Board Treasurer or designated alternate.

Budget revision requests are created on the Online Data Manager system (ODM) and default to a conventional revision request unless a change is made that will re-classify it to a formal revision request. See the ODM user guide for step-by-step instructions.

Conventional Revision Requests (Informal) may only transfer funds among existing approved budget line items that do not exceed 10% of the total grant budget. This does not apply to the equipment or contractual categories. You may submit unlimited conventional budget revision requests throughout the grant period; however, these conventional revisions cannot exceed a cumulative 10% of the total grant budget.

Formal Revision Requests include the addition of a new budget line item; increasing or decreasing the contractual or equipment category amounts, or the transfer of more than 10% of the budget amount. Formal budget revision requests are limited to one per quarter.



References

[1 TAC §3.2501, Grant Officials](#)

[1 TAC §3.2513, Grant Adjustments](#)

[ODM User Guide](#)

4. Monitor



Monitoring by Texas CASA

Overview. Texas CASA has oversight responsibility for the grants it awards. Monitoring may consist of programmatic reviews, financial reviews, technical assistance or formal audits commissioned by Texas CASA and may initiate monitoring through an onsite review at the grantee's location.

Annual Internal Control Review. Texas CASA will annually review each program's financial policies and procedures. Texas CASA will request programs' financial policies and producers, blanket fidelity bond and the Texas CASA internal controls worksheet be submitted by November 30 each year.

Annual Review of Grant Documentation. Texas CASA will randomly select a month, once a fiscal year for supporting grant documentation (personnel timesheets, volunteer timesheets, travel documentation, employee payroll records and proof of most recent payroll tax payment).

Documentation Inquiries. Texas CASA may request grantees to submit information needed to conduct a monitoring review. Grantees must make available all records relevant to a monitoring review. Inadequate documentation may result in disallowed costs or other remedies for noncompliance.

Technical Site Visits. Texas CASA's Grants Department conducts technical site visits for programs if requested by the Quality Assurance (QA) team or by the local program itself. Technical site visits include assistance and monitoring of all grant processes, including grant applications, creating and submitting request for reimbursements, monitoring of internal controls, budget revisions and navigating the Online Data Manager system (ODM).

Follow-up. After a monitoring review is complete, the grantee will receive either a preliminary report or a final report. Texas CASA will issue a preliminary report outlining identified findings (if any), along with recommendations to resolve the findings.



References

[1 TAC §3.2601, Monitoring](#)

[1 TAC §3.2525, Evaluating Project Effectiveness](#)

[1 TAC §3.2529, Grant Management](#)

[2 CFR § 200.331\(d\)-\(f\), Requirements for pass-through entities](#)

[2 CFR §200.338, Remedies for noncompliance](#)

[UGMS, Part III, Subpart C, 40. Monitoring and reporting program performance](#)

[UGMS, Part III, Subpart C, .43 Enforcement](#)

Response. The grantee must respond to the preliminary report with a management response that addresses the finding(s) included in the report. This management response must be provided to the monitor within the timeframe specified in the report. A corrective action plan shall include:

- the titles of the persons responsible for implementing the corrective action plan,
- the corrective action to be taken, and
- the anticipated completion date.

Disagreement. If the grantee believes corrective action is not required, the management response must provide an explanation of the specific reason(s). Texas CASA will determine whether the response is adequate.

Final Report and Resolution. The grantee's management response and the approved corrective action plan will become part of the final report. The grantee shall resolve all identified findings within the time specified by Texas CASA.

Grantee Monitoring

Grant and Sub-award Monitoring. Grantees must regularly evaluate their projects. Grantees are responsible for monitoring the day-to-day operations of grant and sub-award supported activities, including those of their contractors and subcontractors. Grantees must develop and maintain a standardized monitoring program incorporating best practices. Grantees must maintain written documentation supporting monitoring conducted by the grantee in their project files for inspection during a monitoring review.



References

[1 TAC §3.2601, Monitoring](#)

[1 TAC §3.2525, Evaluating Project Effectiveness](#)

[1 TAC §3.2529, Grant Management](#)

[2 CFR §200.328\(a\) Monitoring and reporting program performance](#)

[UGMS, Part III, Subpart C,](#)

[. Monitoring and reporting program performance](#) ⁴⁰

Annual Audit Reports

Requirement. Grantees that expend \$750,000 or more in combined federal grant funding, during the entity's fiscal year, or \$750,000 or more in combined state grant funding, during the entity's fiscal year, must submit a Single Audit reporting package. If a grantee expends less than \$750,000 in combined federal or combined state grant funding in a fiscal year, the grantee must certify this fact to Texas CASA and submit a program audit. Audits must be uploaded to Texas CASA in the ODM.

Reporting. Annual Audit reports are due within 30 calendar days of receiving from the auditor or no later than 9 months after the end of the fiscal year, whichever is earlier.

All other audits performed by auditors independent of Texas CASA must be maintained at the grantee's administrative offices and be made available upon request.

Adverse Findings. Grantees must notify Texas CASA of any audit results that may adversely impact grant funds.



References

[1 TAC §3.2603, Audits Not Performed by CJD, HSGD, or OCM](#)

[2 CFR 200, Subpart F-Audit Requirements](#)

[UGMS IV.B. .200- .205 Audit requirements](#)

[UGMS IV.C. .300 Auditee responsibilities.](#)

Fraud, Waste & Abuse

Most Common Types of Fraud. Most cases of fraud fall into one of three categories:

- **Conflict of Interest.** No one involved with a grant can participate in any decisions, approvals, disapprovals, recommendations, decisions or other action if it concerns or benefits family members, a partner, any organization they serve in an official capacity or any organization they are considering employment with.
- **Failure to Properly Support the Use of Award Funds.** Typical issues involve deliberate redirection of funds in a manner different from the purpose outlined in the award agreement or failure to adequately account for, track or support transactions.
- **Theft.** This is the most common issue. Keep in mind that people who embezzle funds can be extremely creative, while often appearing very trustworthy. These abilities are precisely why they can do so much damage to an organization and remain undetected for extended periods of time. Poor or no internal controls provide an opening for theft. A lack of proper separation of duties is one of the most common weaknesses.

Mandatory Disclosures. Grantees and applicants must disclose, in a timely manner, in writing to Texas CASA, all violations of federal or state criminal law involving fraud, bribery or gratuity violations potentially affecting the grant award. Failure to make required disclosures can result in grant sanctions including termination of the award.



References

[DOJ Grants Financial Guide, 3.20
Grant Fraud, Waste, and Abuse](#)
[2 CFR §200.113, Mandatory
Disclosures](#)

Reducing Risk

Reduce the Risk. There are several things that you can do to reduce the risk of fraudulent use of your grant funds:

- **Controls.** Examine your operations and internal controls to identify your fraud vulnerabilities. Maintain a well-designed and tested system of internal controls.
- **Education.** Implement specific fraud prevention strategies including educating others about the risks. The more people are aware of the issues, the more they can help prevent problems or detect them as early as possible.
- **Documentation.** Ensure all financial or other certifications and progress reports are adequately supported with appropriate documentation and evidence.
- **Conflicts of Interest.** Identify any potential conflict-of-interest issues and disclose them to the awarding agency for specific guidance and advice.
- **Fair Procurement.** Follow a fair and transparent procurement process, especially when using consultants. Ensure that the rate of pay is reasonable and justifiable, and that the work product is well-defined and documented.



References

[DOJ Grants Financial Guide, 3.20 Grant Fraud, Waste, and Abuse](#)



Tools

[Check Receipt Log](#)

[Checks Received Policies & Procedures](#)

5. Close



Closing the Grant

Liabilities. All payments made after the completion of the grant period must relate to obligations incurred or expended during the grant period.

Deobligation. Funds not obligated by the end of the grant period will revert to the grantor agency.

Progress Reports and Performance Measures. *For VOCA:* Local programs are required to submit quarterly progress reports to the Governor's office [here](#). *For CVC:* Submit your final CVC performance measure report through the Online Data Manager.

Once your report has been approved by Texas CASA, your grant will be considered programmatically closed.

Final RFR. Once you have expended all obligations, submit the final RFR that includes all cumulative expenses incurred under the grant. This report must be submitted by the provided due date, which is the 10th business day of the following month for CVC and the 15th of the following month for VOCA.

Outstanding Findings. All outstanding findings or corrective active plans from programmatic monitoring or Texas CASA must be resolved prior to the close of the grant.



References

[1 TAC §3.2527, Grantee Reports](#)

[1 TAC §3.2525, Evaluating Project Effectiveness](#)

[1 TAC §3.2529, Grant Management](#)

[1 TAC §3.2509, Equipment Inventory Reports](#)

[1 TAC §3.2507, Financial Status Reports](#)

[2 CFR §200.313, Equipment](#)

[UGMS, Part III, Subpart C, .41 Financial Reporting](#)

[CVC Performance & VOCA Progress Report Deadlines](#)

Records Retention

Core Requirement. Grantees are required to maintain for a period of time as required under the grant contracts with Texas CASA. Grantees may retain records in an electronic format. All records are subject to audit or monitoring during the entire retention period.

Equipment. Grantees must retain records for equipment, non-expendable personal property and real property for a period of three years from the date of the item's disposition, replacement or transfer.

Further Actions. If any litigation, claim or audit is started before the expiration of the three-year records retention period, the grantee must retain the records under review until completion of the action and resolution of all issues which arise from it or until the end of the regular three-year period, whichever is later.

*Grantees receiving an award between 9/1/15 and 8/31/16 are required to maintain records for a period of seven years as stated within the grant conditions for those awards.



References

[1 TAC §3.2505, Retention of Records](#)

[2 CFR §200.333, Retention requirements for records](#)

[UGMS, Part III, Subpart C, .42 Retention and access requirements for records](#)

[Records Retention Policy](#)