

Texas CASA Grants Management

Guide to Grants

Updated September 2024



STRENGTHENING THE VOICES OF CASA STATEWIDE



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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 below for additional information and resources.

The Guide as a Pointer System:

This guide does not provide every rule or policy that governs your grant. The guide 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.

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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 Request for Reimbursements (RFRs) from local programs; making monthly, quarterly and annual reports to our various funding agencies; internal controls; conducting grant application reviews; managing grant formulas; and conducting grants compliance monitoring.

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
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Melissa Foley Grant Advising Manager	mfoley@texascasa.org
Wilbert King Grants Compliance Specialist	wking@texascasa.org
Grants Department Email	grants@texascasa.org

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 \$19.4 million of VOCA funds, including Urban and Nonurban, will be distributed to local programs in FY 2024. 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, \$5,000 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 Percent of Children Served with a Volunteer (PChV). See the below 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.).

Additional VOCA Urban and Nonurban Funds: (\$2.6 million) are available and may be applied for by submitting a separate application. Eligible nonurban programs may submit a competitive application to increase the number of children served in their service area and/or improve volunteer advocacy to promote better outcomes for children. Urban programs receive additional funding for sustainability, capacity building and to strengthen child advocacy. See the below reference bar for more information



References:
[VOCA Funding Formula](#)

Fund Sources (continued)

Health and Human Services Commission (HHSC): 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 consists mainly of General Revenue (GR). An estimated \$13.3 million will be distributed in FY 2025 directly to the local CASA programs that have been in operation more than six months. This will be distributed by our HHSC formula based on the number of children served with volunteer advocates and includes a base of \$45,000 for each eligible program. In addition, multi-county funds are distributed to those programs serving two or more counties. A flat \$5,000 is allocated per outlying county.

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

Additional HHSC Priority Funds: (\$1.75 million) are awarded to programs based on children served in permanent managing conservatorship (PMC) and serving children with Collaborative Family Engagement (CFE) activities.

Volunteer Travel Direct Grant: The volunteer travel direct grant is a separate grant comprised of programmatic VOCA, HHSC and Swalm funds. The purpose of the volunteer travel reimbursement funding is to help local CASA programs assist their volunteers with the travel costs for long distance travel to visit their CASA children. During FY 2025, there will be an initial grant set up of \$150,000. The grant is first come, first serve, and additional funds will only be added if they become available.

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 \$222,000 in Swalm monies during FY 2025. 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:

[HHSC Funding Formula](#)
[FY25 VT Direct Grant Guidelines](#)

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 their area. Local programs are able to use the 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 HHSC expenses incurred for pre-service volunteer advocate training. Local programs are required to identify these expenses in their HHSC 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:

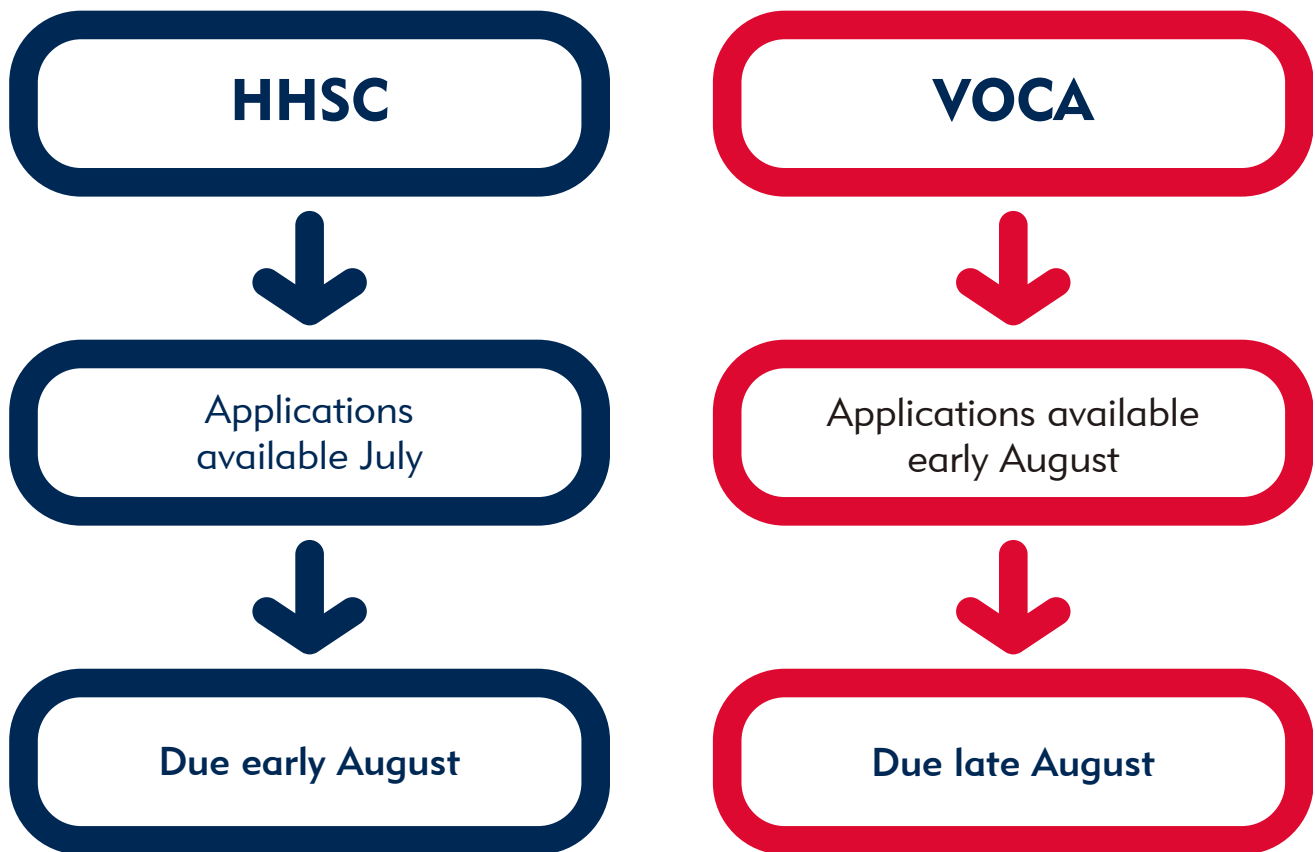
[CASA License Plate Flyer](#)

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

Application Timeline

HHSC Application: Each program will receive an automated award letter when the HHSC grant applications are loaded onto Texas CASA's Online Data Manager (ODM). The first letter goes out for HHSC 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.

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.



Award



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 HHSC 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.

Nonprofit 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 HHSC combined. The cost of the bond is an eligible expense of the grant.



References:

References 1 TAC §3.2001, Conditions of Funding

1 TAC §3.2515,

Bonding Standard

Conditions

Requirements & Guidance

Requirements:

The following are three sets of requirements 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.

- 1) 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.
- 2) Texas Grant Management Standards (TxGMS): The Texas State Comptroller's Office issues TxGMS. This applies to all grants funded with state funds issued by state agencies.
- 3) 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. The Criminal Justice Division adopts these rules for all federally funded grants. Throughout the Guide to Grants, these rules are referred to as 2 CFR Part 200.

In addition to the requirements, 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 U.S. Department of Justice and offers more in-depth information on common issues in grants and financial management.



References:

Texas Administrative Code

Title 2 CFR Part 200

TxGMS

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.
- 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.
- 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 Who signs what?	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)*		✓	

*The Board Treasurer may designate an alternate to certify or sign budget revisions and monthly requests for reimbursements. The alternate cannot sign contracts. 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.

References:

1 TAC §3.2501, Grant Officials

Report



Requests for Reimbursement

Monthly Requirement: Requests for reimbursements (RFR) 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

HHSC – 10th of the month.

VOCA – 15th of the month.

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



References:

1 TAC §3.2507, Financial Status Reports

2 CFR §200.327, Financial reporting

TxGMS Financial Reporting_(pg. 28).

ODM User Guide

Direct Deposit Authorization

RFR Timelines

Annual Reporting

VOCA Subgrant Award Report: Grantees must report to the governor's office within 45 days of signing the VOCA contract [here](#).

Quarterly 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: The VOCA progress reports are entered on the Online Data Manager (ODM) – see Accounts page.

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



References:

[TAC §3.2527, Grantee Reports](#)

[TxGMS Monitoring and Reporting_\(pg. 28\)](#)

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

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

[ODM User Guide](#)

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

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 subrecipients 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

TxGMS, (pg. 13)

DOJ Grants Financial Guide, 2.3 Standards for Financial Management Systems 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.



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, including shirts
- Any salary or compensation for an elected or appointed city, county or state government official
- Construction/Remodeling
- Food and Entertainment (meals excluding meals with receipts for overnight travel)
- Corporate formation
- Entertainment
- Fines and penalties
- Credit card fees
- Tips
- Lobbying
- Fundraising
- 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
- 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:

[Eligible & Ineligible Types of Expenses – VOCA & HHSC DOJ Grants Financial Guide, 3.11 Unallowable Costs TxGMS, Part II, Attachment B, Selected Items of Cost](#)
[2 CFR 200.420, Consideration for Selected Items of Cost](#)

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 HHSC, cannot 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 an in-kind match, over cash match which requires using hard cash. Texas CASA allows \$31 per hour for volunteers.

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 TxGMS, Cost Sharing or Matching, pg. 15

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 below, the organization has 10 employees; 5 are fully funded by VOCA, 4 are fully funded by HHSC, 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	HHSC	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	HHSC	United Way	Total
Percent of Total	50%	40%	10%	100%
Rent Allocation	\$500	\$400	\$100	\$1,000

Budget Cost Allocation (continued)

Revenue Stream Allocation Example:

The Revenue Stream Allocation method uses proportional components of total revenue to divvy up shared costs. In the example below, the organization receives \$300,000 in total revenue; \$100,000 from the VOCA Grant, \$50,000 from the HHSC 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	HHSC	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	HHSC	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

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.
- 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.

**Budget Tip: Fringe percent applied to the grant must be equal to or less than the associated salary percent.*



References:

- Budget Cost Allocations
- 1 TAC §3.75, Personnel
- 2 CFR § 200.430, Compensation— Personal Services
- TxGMS, Starting on Pg. 96
- DOJ Grants Financial Guide, 3.9 Allowable Costs

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 HHSC 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

TxGMS, (pg. 29), Compensation - Personal Services

Forms:

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
- TxGMS – Procurement Standards

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 purchases must be classified as equipment regardless of cost. Software as a service/subscription is a direct operating expense (DOE). 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

- References 1 TAC §3.2509, Equipment Inventory Reports
- 3 TAC §3.81, Equipment
- 2 CFR §200.439, Equipment and other capital expenditures
- 2 CFR §200.313, Equipment
- TxGMS (pg. 26)
- 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 previously defined) 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 does not need to 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 does not need to 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:

References 1 TAC §3.2509, Equipment Inventory Reports
3 TAC §3.81, Equipment
2 CFR §200.439, Equipment and other capital expenditures
2 CFR §200.313, 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 local program's established mileage, allowable meal reimbursement, 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 by staff and volunteers for direct services, case recruitment and court appointed special advocacy training.
 - No administrative travel costs should be charged to the grant.
 - On grant budgets, case-related travel and training/other travel must be separated as two different line items.
- Some examples of allowable travel costs are meal reimbursement for staff, lodging, airfare and mileage (or rental car, whichever is more cost effective). Gas for rental cars is allowable, but only when not prepaid.
- 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.

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



References:

State Travel Guidelines

1 TAC §3.79, Travel and Training

2 CFR §200.473, Training and Education Costs

2 CFR §200.474, Transportation Costs

TxGMS, Travel Costs, (pg. 128)

DOJ Grants Financial Guide, 3.9 Allowable Costs

GSA Travel Resources

Supplies

Supplies: Includes office supplies, postage, training supplies and printing of materials (e.g. brochures) that describe available services and how to obtain them. Promotional items (e.g. t-shirts, pens, cups, etc.), even when used at a volunteer recruitment event, are not allowable.

Direct Operating Expenses

Direct Operating Expenses. This budget category includes registration fees for conference/training; building rent; utilities; telephone service; building and property insurance (HHSC 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 HHSC only); Directors and Officers (D&O) insurance; employee counseling service (HHSC only), employee information publications and related expenses incurred in accordance with a governmental unit's policy; advertising for the purpose of volunteer recruitment; subscriptions to business, professional and technical periodicals; software subscriptions; and copyright fees.

Note: A cell phone reimbursement is allowable for up to \$60 per employee, per month.



References:

1 TAC §3.83, Supplies and Direct Operating Expenses

2 CFR §200.453, Supplies

TxGMS General Provisions for Selected Items of Cost (pg. 39)

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 and must be submitted 30 days prior to the end of the grant term.

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 and must be submitted 30 days prior to the end of the grant term.



References:

[1 TAC §3.2501, Grant Officials](#)

[1 TAC §3.2513, Grant Adjustments](#)

[ODM User Guide](#)

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 on-site review at the grantee's location.

Annual Internal Control Questionnaire (ICQ) Review: Texas CASA will annually review each program's financial policies and procedures. Texas CASA will request programs' financial policies and procedures, 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 specific month, once a fiscal year for supporting grant documentation (personnel timesheets, volunteer timesheets, travel documentation, employee payroll records, invoices/ receipts for supplies, proof of payment for supplies, invoices/receipts for DOE, proof of payment for DOE 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.

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.
- The anticipated completion date.

Monitoring by Texas CASA (continued)

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.



References:

- [1 TAC §3.2601, Monitoring](#)
- [1 TAC §3.2525, Evaluating Project Effectiveness](#)
- [1 TAC §3.2529, Grant Management](#)
- [2 CFR § 200.332\(d\)-\(f\), Requirements for pass-through entities](#)
- [2 CFR §200.339, Remedies for noncompliance](#)
- [TxGMS Monitoring and Reporting Program Performance \(pg. 40\)](#)
- [TxGMS Remedies for Noncompliance \(pg. 29\)](#)

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 activities, including those of their contractors. 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 §200.329\(a\) Monitoring and reporting program performance \(HELP\)](#)
- [TxGMS Monitoring and Reporting Program Performance \(pg. 28\)](#)

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

TxGMS Audits (pg. 40) and Auditee (pg. 43).

Fraud, Waste & Abuse

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

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](#)

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.

De-obligation: Funds not obligated by the end of the grant period will revert to the grantor agency.

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 of the following month for HHSC 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

TxGMS Performance and Financial Monitoring and Reporting (pg. 28)

HHSC Performance & VOCA Progress Report Deadlines

Records Retention

Core Requirement: Grantees are required to maintain records for a period of seven (7) years. 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 seven 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 seven-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 seven-year period, whichever is later.



References:

- 1 TAC §3.2505, Retention of Records
- 2 CFR §200.333, Retention requirements for records
- TxGMS Records Retention and Access (pg. 29)