



# Fund for Veterans' Assistance

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# Grant Compliance

Fund for Veterans' Assistance: [www.tvc.texas.gov/grants](http://www.tvc.texas.gov/grants)



# Fund for Veterans' Assistance

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## Topics

- Overview
- Compliance Reviews
- Documentation Requirements
- Performance Standard
- Key Terms
- Questions?



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## Overview

- Ensure all grantees are aware of the rules governing the program
- Provide a summary of expectations and desired results
- Provide guidance for a successful grant period



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## Compliance Reviews

### **Purpose:**

- Protect the fund from fraud, waste, and abuse
- Evaluate adherence to rules and regulations governing the fund
- Verify funds are spent for costs that are allowable, reasonable, and allocable
- Evaluate grant performance





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## Compliance Reviews

### Financial

#### Financial Management System:

- Your financial management system (accounting software) must be sufficient to prepare accurate, current, and complete statements and reports AND have the ability to trace funds to ensure they were used according to all applicable laws, rules, and terms & conditions.





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## Compliance Reviews

### Financial

#### General Ledger:

- Record of all financial transactions
- Reconciled monthly to ensure accuracy
- Separation of duties: one person should not prepare, review and approve





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## Compliance Reviews

### Financial



### Check/Electronic Payment Controls:

- If checks are physical, are they securely stored?
- Who has access?
- Separation of duties: one (1) person should not prepare, review and/or approve
- Who has authority to approve/sign?
- Grants providing Financial Assistance must make payments directly to the vendor, not the client.



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## Compliance Reviews

### Financial



### **Credit/Debit/Purchase Card & Line of Credit Controls:**

- If cards are physical, are they securely stored?
- Who has access?
- Separation of duties: one (1) person should not prepare, review, and/or approve.
- Who has authority to approve/sign?





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## Compliance Reviews

### Beneficiary Eligibility

#### Identity



#### Relationship

(Dependents & Surviving Spouses)



#### Veteran Status





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## Compliance Reviews

### TVC Recognition

**Grantee must include the “3 L’s” on website and all Grant Project-related materials.**

- Logo
- Lingo
- Link



*This program is supported by a grant from the Texas Veterans Commission Fund for Veterans' Assistance. The Fund for Veterans' Assistance provides grants to organizations serving veterans and their families. For more information, visit [www.tvc.texas.gov](http://www.tvc.texas.gov).*



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## Documentation

### Governance Documents

**All grantees should be familiar with:**

- Code of Federal Regulations (CFR) “2 CFR 200”
- Texas Grant Management Standards (TxGMS)
- Texas Administrative Code (TAC)
- TVC-FVA Request for Applications (RFA)
- TVC-FVA Program Requirements and Terms & Conditions (PR)
- TVC-FVA Beneficiary Eligibility Documentation Requirements
- TVC-FVA Reimbursement Documentation Requirements (RDR)
- Grantee’s Awarded Grant





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## Documentation

### Payment Reimbursement Request (PRR)

- Each reimbursed cost/expense must match with your General Ledger and supporting documentation:
  - Beneficiary Information
  - Proof of Cost Incurred
  - Demonstration of Payment





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## Documentation

### Beneficiary Eligibility



- You can only serve the clients in your Awarded Grant
  - Awarded Grant-specific Veterans, Dependents and/or Surviving Spouses
- Documentation must be retained in the clients' file for a minimum of 3 years
- See 2024-25 Beneficiary Eligibility Documentation Requirements



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## Documentation

### Verification:

Veteran



### 1. Identity

valid Texas-issued Photo ID

### 2. Veteran Status

Record of Military Service



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## Documentation

### Verification:

Dependent (Child)



1. **Identity** (if available)  
valid Photo ID
2. **Relationship to Veteran**  
Birth Certification or  
Adoption Certificate
3. **Veteran Status**  
Record of Military Service



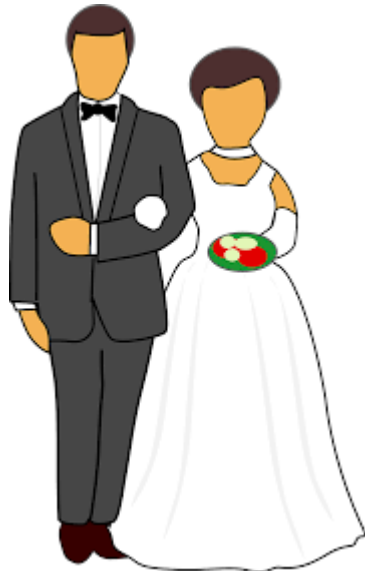
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## Documentation

### Verification:

Dependent (Spouse)



### 1. Identity

valid Texas-issued Photo ID

### 2. Relationship to Veteran

Marriage Certificate or  
Common Law Declaration

### 3. Veteran Status

Record of Military Service





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## Documentation

### Verification:

Surviving Spouse



### 1. Identity

valid Texas-issued Photo ID

### 2. Relationship to Veteran

Marriage Certificate or  
Common Law Declaration  
**AND** Death Certificate

### 3. Veteran Status

Record of Military Service



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## Documentation

### Reporting Clients Served



#### **Beneficiary Eligibility Determination**

The Grantee must ensure that clients served using TVC grant funds are eligible prior to providing services to these clients. Eligibility documentation for each client served must be maintained by the Grantee for a minimum of three (3) years after the grant period ends.

#### **Unduplicated Beneficiaries Served**

Grantees shall report beneficiaries served as *Unduplicated* in the Monthly Report. For purposes of this grant, unduplicated shall be defined as not previously counted during the grant award period.

#### **Counting Beneficiaries**

Beneficiaries/clients are not considered served and cannot be counted if they did not receive grant-funded services as outlined in the Approved Application.







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## Performance Standard (Benchmark)

Quarter	Dates	Performance
1st	July - September	15%
2nd	October - December	40%
Renewal Eligibility	July - February	60%
3rd	January - March	70%
4th	April - June	95%

- Calculated by the Total Number of *Unduplicated* Clients Served
- Set according to the Quarter timeframe of the grant period
- Measurement to reveal how the grant is performing
- Target to keep Grantees on pace throughout the grant period



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## Performance Standard

### Renewal Eligibility

**Grant Renewal Eligibility:** The Commission may, in its sole discretion, exercise the option to renew the grant for an additional one (1) year period. FVA will notify the Commission during the 3rd Quarter Regular Commission meeting of all Grantees who have met the criteria listed below for renewal. Grantees must meet the following criteria:

- Achieve 60% of their *'Total Number of Clients to Be Served'* by February 28th, which is the eighth (8<sup>th</sup>) month of the grant period (July 1<sup>st</sup> – February 28<sup>th</sup>).
- Have no unresolved compliance findings.



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## Prohibited Uses of Funds

- Capital expenditures, including capital purchases or capital leases, except for grant funds awarded under the Housing for Texas Heroes program.
- Sub-granting of funds to other organizations or agencies.
- Distribution of cash or a cash equivalent to veterans and/or their dependents. Cash equivalents include gift cards or pre-paid service cards, such as gas, grocery, and department store-related cards.
- Acquisition or construction of facilities, except for grant funds awarded under the Housing for Texas Heroes program for home modifications, repairs, and weatherization.
- Scholarships for Education.
- Payment of Child Support.
- Any expense not necessary to complete the grant project, or not consistent with the Grant Agreement.
- Contributions to any political party, political association, or the campaign of any candidate for public office, party office, or similar political activities.
- Contributions that support or oppose candidates for public or party office, or to support or oppose any ballot propositions.
- Medical costs, including physician fees, prescription medications, over-the-counter medications, medical insurance premiums or copays, emergency/after-hours clinic fees, and prescribed prosthetics.
- Stipends for beneficiaries, volunteers, students, interns, employees, and members of the board of directors.
- Payments for capital assets that are not physically in Texas.
- Any cost that is not allowable under the Grant Agreement, the Fund for Veterans' Assistance Fiscal Guidelines, Texas Grant Management Standards (TxGMS), or 2 C.F.R. 200 - Uniform Administrative Requirements, Costs Principles, and Audit Requirements for Federal Awards.



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## Key Terms

**Beneficiary:** a member of the target population served by the Grantee. For purposes of this grant, the Beneficiary, is a Texas Veteran, Texas Veteran's Dependent, or a Texas Surviving Spouse.

**Veteran:** as defined by each Grantee's Awarded Grant.

**Dependent (Child):** a minor (before the age of 18) biological, step, or adopted child of a Texas Veteran residing with the Veteran or under age 23 if a full-time student. Includes a child who is incapable of self-support because of a mental or physical incapacity that existed before age 21 or occurred before the age of 23 while a full-time student.

**Dependent (Spouse):** the husband or the wife of a Texas Veteran residing with the Veteran.

**Surviving Spouse:** a person who was the spouse of the Veteran at the time of the veteran's death and (a) who lived with the veteran continuously from the date of marriage to the date of the veteran's death, and (b) has not remarried or has not since the death of the veteran and after September 19, 1962, lived with another person and held himself or herself out openly to the public to be the spouse of such other person.





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## Key Terms

(continued)

**Low Income:** 80% of the median family income for the county in which the beneficiary lives as defined by the U.S. Department of Housing and Urban Development (HUD).

**Very Low-Income:** 50% of the median family income for the county in which the beneficiary lives as defined by the U.S. Department of Housing and Urban Development (HUD).

**Homeless Veteran:** individuals who have lost their primary nighttime residence or are living in a place not meant for human habitation, in an emergency shelter, in transitional housing, have transitioned out of a homeless status, or are exiting an institution where they temporarily resided.



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## Key Terms

(continued)

**Reasonable:** a cost is reasonable if, in its nature and amount, it does not exceed that which would be paid by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

**Allowable:** a cost that is allocable, necessary, and reasonable for the performance of the award and conforms to any limitation set forth in the RFA and is consistent with policies and procedures that apply uniformly to grant awards and other activities of the grantee.

**Allocable:** the process of assigning a cost in reasonable proportion to the benefit provided or other equitable relationship. A cost is allocable to an award if the goods or services involved are chargeable or assignable to that award in accordance with relative benefits received.



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## Grantee Resources

[www.tvc.texas.gov/grantees](http://www.tvc.texas.gov/grantees)

For 2024-2025 Grantees

### Governance Documents

- FVA Governance Documents
- Other Governance Documents
- Housing for Texas Heroes
- User Guides
- Direct Deposit Forms



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# Questions?