

# Honor Guard Grant Program

Comprehensive Grant Manual

Tennessee Department of Veterans Services | Comprehensive Guide | January 2024

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# **Executive Summary**

The Honor Guard Grant Program (HGGP) is a state-administered initiative that provides financial support to Tennessee Veteran Service Organizations (VSOs). The program's primary goal is to offset expenses incurred by VSOs in providing honor guard burial details at the funerals of qualifying Tennessee veterans. The program covers various expenses, including training, transportation, food, and equipment, ensuring our veterans' dignity and respect are maintained during these services.

The program operates under the governance of the Tennessee Code Annotated, Title 4, Chapter 3, Part 25. It was legislated under Public Chapter No. 404, House Bill No. 1072. This establishes the Department of Veterans Services' authority to administer the grant program and sets forth the conditions under which grants may be issued.

The HGGP is primarily funded through appropriations by the Tennessee General Assembly. The program may also receive gifts, grants, and other donations. The legislative intent for the fiscal year 2023-2024 is an appropriation of seventy-five thousand dollars (\$75,000) for awarding grants from the fund. The allocation and disbursement are based on the availability of funding and are at the discretion of the Department of Veterans Services.

To be eligible for the grant, VSOs must be registered with the Secretary of State and fall under the tax-exempt § 501(c)(19) category per the Internal Revenue Code. Additionally, "qualifying veterans" are decedents eligible for a military funeral honors ceremony under the National Defense Authorization Act for Fiscal Year 2000, Public Law 106-65.

This Executive Summary serves as an overview of the critical components of the Honor Guard Grant Program. Please refer to the comprehensive manual below for detailed guidelines, procedures, and eligibility criteria.



#### State of Tennessee

#### **PUBLIC CHAPTER NO. 404**

#### **HOUSE BILL NO. 1072**

By Representatives Haston, Littleton, Hurt, White, Warner, Stevens, Slater, Bulso, Brock Martin, Raper, Leatherwood, Greg Martin, Hale, Moody, Cepicky, Moon, Lamberth, Grills, Barrett, Doggett, Boyd, Camper, Carringer, Ragan, Faison, Russell, Parkinson, Whitson, Wright, Campbell, Butler, Rudder, Terry, Beck, Bricken, Chism, Powell, Alexander, Holsclaw, Curtis Johnson, Jernigan, Powers, Eldridge, Sherrell, Hulsey, Hawk, Capley, Howell, Lafferty, Williams, Sparks, Davis, Todd, Reedy

#### Substituted for: Senate Bill No. 1046

By Senators Jackson, Lowe, Walley, Yager, Yarbro, Akbari, Crowe, Massey, Niceley, Rose, Stevens

AN ACT to amend Tennessee Code Annotated, Title 4, Chapter 3, Part 25; Title 46, Chapter 6 and Title 58, relative to funeral honors.

BE IT ENACTED BY THE GENERAL ASSEMBLY OF THE STATE OF TENNESSEE:

SECTION 1. Tennessee Code Annotated, Title 4, Chapter 3, Part 25, is amended by adding the following as a new section:

- (a) The department of veterans services shall establish and administer an honor guard grant program. The purpose of the program is to provide grants to veteran service organizations registered with the secretary of state to offset expenses incurred by the organization and members of the organization's honor guard in providing honor guard burial details at the funerals of qualifying Tennessee veterans, including expenses for training, transportation, food, equipment, and supplies.
- (b) The grant fund is subject to appropriations by the general assembly and gifts, grants, and other donations received by the department for the grant fund. It is the legislative intent that the amount of seventy-five thousand dollars (\$75,000) be appropriated in fiscal year 2023-2024 in the general appropriations act for awarding grants from the fund.
- (c) Subject to the availability of funds, the department shall allocate and disperse grants each fiscal year to nonprofit veteran service organizations. The commissioner of veterans services is authorized to promulgate rules to effectuate the purposes of this section in accordance with the Uniform Administrative Procedures Act, codified in title 4, chapter 5.

#### (d) For purposes of this section:

- (1) "Veteran" means a decedent who is eligible to receive a military funeral honors ceremony pursuant to the National Defense Authorization Act for Fiscal Year 2000, Public Law 106-65; and
- (2) "Veteran service organization" means an association, corporation, or other entity that aids and serves veterans, servicemembers, and dependents, and that is a § 501(c)(19) organization that is exempt from taxation under § 501(a) of the Internal Revenue Code, codified in 26 U.S.C. § 501(a), a federally chartered veterans' service corporation, or a veterans' affairs office or agency established by state law.

SECTION 2. For purposes of promulgating rules, this act takes effect upon becoming a law, the public welfare requiring it. For all other purposes, this act takes effect January 1, 2024, the public welfare requiring it.

# Part 1. Introduction

The Honor Guard Grant Program (HGGP) Manual serves as a comprehensive guide for Veteran Service Organizations (VSOs) seeking to obtain grants for providing honor guard burial details at the funerals of qualifying Tennessee veterans. For this manual, a Veteran Service Organization is defined as an association, corporation, or other entity registered with the Secretary of State that aids and serves veterans, service members, and dependents and that is a § 501(c)(19) organization exempt from taxation under § 501(a) of the Internal Revenue Code, a federally chartered veterans' service corporation, or a veterans' affairs office or agency established by state law. This manual outlines the program's objectives, eligibility criteria, application process, funding and reimbursement guidelines, compliance requirements, and legal framework.

# 1.1 Purpose of the Manual

The purpose of this manual is to provide a detailed operational framework for the HGGP, enabling veteran service organizations to understand the process from start to finish. It aims to ensure that the application and management of grants are conducted in a transparent, equitable, and efficient manner.

#### This manual will:

- Clearly define eligibility criteria to ensure that only qualified organizations apply.
- Lay out the application process, ensuring organizations understand how to submit a comprehensive and accurate application.
- Describe the funding and reimbursement mechanisms helping organizations manage grants effectively.
- Provide a framework for compliance and monitoring, allowing organizations to maintain accountability.

By adhering to the guidelines presented in this manual, organizations can streamline their efforts and make the best use of grant funds, thereby fulfilling the program's objective of honoring Tennessee's veterans.

#### 1.2 Intended Users and How to Use This Manual

#### **Intended Users**

This manual is primarily designed for:

- Veteran Service Organizations (VSOs): Those interested in applying for an HGGP grant or have already secured one.
- Internal Staff within TDVS: Individuals responsible for administering and monitoring the HGGP.
- Other Stakeholders, such as auditors, state officials, and policymakers, requiring an understanding of the HGGP's operational framework.

#### How to Use This Manual

- Pre-Application Phase: VSOs considering applying should first read the 'Eligibility Criteria'
  and 'Application Process' sections. This will help assess whether they meet the program
  requirements and provide an overview of the application steps.
- Application Phase: During this period, VSOs must adhere to the guidelines in the 'Grant Application Components' and 'Required Documentation' sections.
- Post-Application and Award Phase: Once awarded, organizations should consult the 'Funding and Reimbursement Mechanisms' and 'Compliance Monitoring' sections for guidance on effective grant management.
- Compliance and Reporting: All parties, applicants, and awardees should refer to the 'Monitoring and Reporting' and 'Financial Audits' sections. These provide insights into compliance requirements and performance metrics.
- Conflict Resolution and Amendments: If conflicts or changes arise, the 'Conflict Resolution' and 'Amendments' sections provide the needed direction.

The manual is designed to be both comprehensive and modular. Users can refer to individual sections without reading the manual cover to cover.

# Part 2 Program Overview

This section offers a comprehensive snapshot of the Honor Guard Grant Program (HGGP). It outlines the program's primary objectives, grounding in Tennessee state law, and funding mechanisms. For prospective applicants and internal administrators, a clear understanding of these foundational elements is pivotal for effective engagement with the program.

### 2.1 Objective

The primary objective of the Honor Guard Grant Program (HGGP) is to provide grants to veteran service organizations (VSOs) registered with the Secretary of State to offset expenses incurred in delivering honor guard burial details at the funerals of qualifying Tennessee veterans. These expenses include costs incurred by the VSO for:

- 1. **Training:** To ensure that honor guards are well-trained.
- 2. **Transportation and Food:** To offset the logistical costs of providing these services.
- 3. **Equipment and Supplies:** To ensure honor guards are well-equipped to perform their duties.

# 2.2 Legal Framework

The Honor Guard Grant Program operates under the governance of the Tennessee Code Annotated, Title 4, Chapter 3, Part 25. This establishes the Department of Veterans Services' authority to administer the grant program and sets forth the conditions under which grants may be issued.

# 2.3 Funding Sources

The HGGP is primarily funded through appropriations by the Tennessee General Assembly. The program may also receive gifts, grants, and other donations. The legislative intent for the fiscal year 2023-2024 is an appropriation of seventy-five thousand dollars (\$75,000) for awarding grants from the fund. All funding is subject to availability, and the allocation and disbursement of grants each fiscal year are at the discretion of the Department of Veterans Services.

# Part 3 Eligibility Criteria

This section outlines the specific criteria that Veteran Service Organizations and veterans must meet to be eligible for the HGGP. A thorough understanding of these criteria is essential for a successful application and to maintain grant status.

### 3.1 For Veteran Service Organizations

To be eligible for the HGGP, the following criteria must be met by the Veteran Service Organization:

- 1. **Type of Organization:** Must be a § 501(c)(19) organization, federally chartered veterans' service corporation, registered with the Secretary of State or a veterans' affairs office or agency established by state law.
  - a. § 501(c)(19) Organizations: Must be tax-exempt under Section 501(c)(19) of the U.S. tax code. This typically includes posts or auxiliaries of war veterans, organizations of past or present Armed Forces members, and Honor Guard groups.
    - i. Proof: IRS determination letter confirming tax-exempt status under Section 501(c)(19).
  - b. **Federally Chartered Organizations:** Organizations chartered by the U.S. Congress, e.g., American Legion, Veterans of Foreign Wars (VFW), and Disabled American Veterans (DAV).
    - i. Proof: Federal charter outlining mission and purpose in serving veterans.
  - c. **State Veterans' Affairs Offices or Agencies:** Governmental agencies or offices at the state level dedicated to veterans' affairs.
    - i. Proof: Documentation from the state government establishing the agency or office.
- 2. **Qualifying Veteran:** To be eligible for reimbursement, expenses must be incurred by the grantee in providing honor guard burial details at the funerals of qualifying veterans. A "Qualifying Veteran" means a decedent who:
  - a. Served in the active military, naval, or air service and who was discharged or released therefrom under conditions other than dishonorable; or
  - b. Was a member or former member of the Selected Reserve described in 38 U.S.C.A. § 2301(f).

3.	<b>Compliance:</b> By signing the grant application, the applicant certifies that they, along with any officers, directors, owners, partners, employees, or agents, are not debarred or suspended by any state or federal agency. This is by Federal Acquisition Regulation 52.209-5 and Tennessee Comprehensive Rules and Regulations 0690-03-0117.

# Part 4 Registration Requirements

This section outlines the mandatory registration requirements for organizations wishing to participate in the Honor Guard Grant Program (HGGP). Compliance with state and federal requirements is essential for grant eligibility and disbursement of funds.

# 4.1 State Requirements

Before engaging in the application process for the HGGP, organizations must fulfill the following state requirements:

- Registered with the Tennessee Secretary of State: Your organization should have an 'active' status. To verify the roster, visit Tennessee Secretary of State – Business Entity Search.
- 2. **Charitable Contributions Division:** Non-profit agencies soliciting contributions in Tennessee must be registered and renewed annually with the Tennessee Secretary of State, Charitable Contributions Division, unless exempt. More information can be found at <a href="https://sos.tn.gov/charities">https://sos.tn.gov/charities</a>.
- 3. **Tennessee Department of Revenue:** Organizations should be registered for Sales/Use Tax or have exemption documentation. Visit the TN Department of Revenue at <a href="https://tntap.tn.gov/eservices/">https://tntap.tn.gov/eservices/</a> for the necessary forms.

# 4.2 Federal Requirements

To meet federal eligibility criteria for the HGGP, organizations must adhere to the following:

1. **Employer Identification Number (EIN):** Organizations must have an EIN registered with the Internal Revenue Service. For more information, visit the IRS website <a href="https://www.irs.gov/charities-and-nonprofits">https://www.irs.gov/charities-and-nonprofits</a>.

Compliance with these federal and state requirements is non-negotiable for participation in the HGGP. Please meet these criteria to avoid application disqualification.

# **Part 5 Application Process**

This section breaks down the steps involved in applying for the HGGP. From expressing initial interest via an application to successfully submitting the required documentation, this section aims to guide organizations through each phase of the application process.

# 5.1 Application Overview

Prior to applying for the HGGP, applicants should ensure they meet the HGGP registration requirements and eligibility criteria. Additionally, if selected for the funding opportunity, the selected applicant must ensure that they maintain satisfaction of these requirements throughout the duration of their grant contract with TDVS. Failure to do so may result in the termination of a grant contract between TDVS and the selected applicant and/or the return of any money provided to the selected applicant by TDVS while the selected applicant was non-compliant with these eligibility requirements.

Generally, any application submitted will be reviewed by TDVS to determine if the applicant meets the eligibility criteria. If eligibility is established, TDVS will notify the entity that they may proceed with Edison Vendor Setup. (Section 5.3). Upon successful completion of Edison Vendor Setup, TDVS will notify the applicant have been selected for the funding opportunity, and provide information on execution of the grant contract. This notification is non-binding and will remain so until a grant contract is fully executed between the State and the selected applicant. (Section 5.4).

TDVS is not liable and will not reimburse grantee for any expenses incurred prior to the grant contract being fully executed between the State and the grantee or prior to the grant contract's effective date, whichever is later.

### 5.2 Grant Application

The HGGP application must be submitted through the TDVS online grant portal at <a href="https://www.tn.gov/veteran/HGGP">www.tn.gov/veteran/HGGP</a>. The application will require the following information:

1. **Organization Information:** Include the name of your organization, contact information, and the EIN to verify § 501(c)(19) status.

- 2. **Description:** Provide a concise outline of the proposed activities and services you seek funding for.
- 3. **Estimated Funding Request:** An outline of planned expenses in categories like training, transportation, etc. This helps TDVS anticipate the volume and nature of future reimbursement requests but isn't binding.
- 4. **Reimbursement Protocol**: A brief description of how the organization plans to handle reimbursements internally, including who will be responsible for submitting the necessary proof.

**Incomplete Applications:** Incomplete or improperly formatted applications may lead to delays or disqualification. Organizations must ensure their submissions are complete and comply with these guidelines.

### 5.3 Edison Vendor Setup

- 1. **Prerequisite:** Before proceeding with vendor setup, organizations must receive successful verification of their application and 501(c)(19) status from TDVS.
- 2. **Initial Steps:** Upon successful verification, organizations will receive detailed email instructions on registering as a vendor in the Edison system.
- 3. **Required Documentation:** Typically, you'll need the following to register:
  - a. W-9 that is legible and physically signed within a year prior to submission.
  - b. Federal Employer Identification Number (FEIN) or Social Security Number (SSN)
  - c. Banking details for direct deposit
  - d. Contact information
- 4. **Validation:** After all the required information is submitted in Edison, the Edison Team will validate the information.
- 5. **Notification:** Once validated, organizations will receive a confirmation email indicating they are now set up as a vendor.
- 6. **Direct Deposit:** If opting for direct deposit, submit a Direct Deposit Authorization Form to the Financial & Administration department once the Edison team assigns a supplier ID.

**Edison Support:** For any issue, organizations should refer to the Edison support contact provided in the setup instructions.

### 5.4 State of Tennessee Grant Contracts

For each grant, there will be a corresponding grant contract. This is the legally binding document between the grantee and TDVS and allows TDVS to process payments as part of the grant.

Each grant contract ensures that the grantee and the State comply with both federal and state law. Each grant contract is generally broken down into six (6) sections (see below) all of which are subject to grantee monitoring. Each section outlines different responsibilities and legal requirements that an agency must satisfy:

- 1. **Section A Scope of Service:** Defines what the grant is and sets the stage for what can and cannot be purchased. It is recommended that you stay in contact with your grant monitor regarding purchases and reimbursement requests to ensure that what you are considering is indeed eligible.
- 2. **Section B Term of Contract:** Defines the time period that the grant contract is in effect, and corresponding considerations.
- 3. **Section C Payment Terms and Conditions:** Specifies financial requirements under the grant contract. This section includes terms relating to the grant contract's maximum liability and corresponding program budget, how the grantee should submit invoices and what these invoices must contain, and limits on reimbursement.
- 4. **Section D Standard Terms and Conditions:** Provides "Standard Terms and Conditions." This section provides wide-varying terms that protect the State's interest and ensures that the grantee is complying with state and federal law. Additionally, this section includes terms related to grant contract amendment and grant contract termination.
- 5. **Section E Special Terms and Conditions:** Provides "Special Terms and Conditions." This section provides terms and conditions that will vary per grant contract depending upon the program for which the State is contracting. Special terms may include terms related to grantee insurance, indemnification of the State, and other terms as deemed necessitated under federal or state law.

Prior to signing a grant contract, the grantee should <u>read the entire grant contract</u>, <u>understand</u> <u>all of their obligations under the grant contract</u>, <u>and ensure they can meet such obligations</u>.

Failure to meet the obligations under the grant contract may result in grant contract termination and/or reimbursement to the state of funds dispersed to the grantee.

# Part 6 Funding and Reimbursement

This section outlines the types of expenses eligible for reimbursement under HGGP. It also details the procedure for requesting reimbursements and the documentation required.

#### 6.1 Reimbursement Grants

The HGGP is a cost-reimbursement grant. What this means is that the grantee will not receive a single lump sum at the beginning of the grant. Instead, the funds will be dispersed upon receipt of eligible invoices to TDVS, subject to available funding.

Reimbursement it contingent upon the grantee complying with all grant requirements and the availability of sufficient funds. TDVS does not represent or guarantee availability of funds for reimbursement. Once a grant has been awarded and becomes effective, TDVS will reimburse the grantee for actual, reasonable, and necessary costs of items eligible within the grant. It is preferable that purchases occur early in the grant period for maximum benefit.

# 6.2 Eligible Costs and Allocation Cap

The HGGP offers reimbursements for specific categories. These categories are as follows:

1. **Training:** Costs associated with training of Honor Guard members are allowable if the training and costs support the objectives outlined in the HGGP.

#### 2. Transportation and Food:

- a. VSO: Mileage is reimbursed at the federal rate, and there is an additional allowance of up to \$200 for other transportation-related expenses.
- b. Individual: A per diem rate of \$50 per person per day involved in the honor guard detail covers food and travel-related expenses.

#### 3. Equipment and Supplies:

- **a. Ceremonial Equipment:** Includes items, e.g., flags, flag stands, rifles, bugles, uniforms, and other items used explicitly in honor guard burial details.
- **b. Other Supplies:** This category includes miscellaneous items needed for the honor guard service but not considered ceremonial equipment, such as first-aid kits, cleaning supplies for equipment, and small hand tools for repairs.

**Total Allocation Cap:** Reimbursement will be based on expenses incurred, up to the overall cap of \$7,500 per organization per fiscal year.

**Federal Allowance Rates:** Mileage reimbursement rates are based on the federal allowance rates, and the amounts will be calculated based on the address registered with the IRS and Secretary of State. Those rates are at this link: <u>Per Diem Rates | GSA</u>.

#### 6.3 Reimbursement Procedure

- 1. **Vendor Setup:** Ensure your organization is set up as a vendor in the Edison system.
- 2. **Initiation:** To initiate the reimbursement process, visit <a href="https://www.tn.gov/veteran/HGGP">www.tn.gov/veteran/HGGP</a> and complete the Reimbursement Request Form.
- 3. **Documentation Upload:** Attach all required documentation within the form. (Section 6.3). Only complete submissions will be processed.
- 4. **Initial Review**: TDVS staff will review the request and attached documents for completeness and compliance with HGGP rules.
- 5. **Approval or Query:** TDVS will approve the invoice for payment if all requirements are met and if funding is available. You'll be contacted for clarification or additional documentation if there are issues.
- 6. **Payment Processing**: Approved reimbursements will be forwarded to the Tennessee Department of Finance and Administration and processed via the Edison system.
- 7. **Processing Time:** Approximately 30 business days
- 8. **Notification:** Organizations will be emailed upon approval or rejection of their reimbursement request.

**Reimbursement Frequency**: It is requested that invoices and reimbursement requests be submitted by the 15<sup>th</sup> of every month following the approval of the individual contract, except for the final invoice. The final invoice is due no later than July 7th at 4PM CST due to the State's fiscal year end.

# 6.3 Required Documentation

1. **Original Itemized Receipts or Invoices:** Detailed financial documents showing the incurred expenses. These must be clearly labeled and organized. Review Section 6.4 for more information on invoicing guidelines.

- 2. Burial Service Reimbursement Request Form: TDVS will provide a form that must be included with each request for burial service reimbursements. This form will require documentation including, but not limited to, the name and signature of each member of the honor guard detail performing the service, the signature of the funeral or cemetery director, and an attestation that the service was provided for a "Qualified Veteran." See Section 3.
- 3. **Service Agreements or Contracts:** Documentation detailing the services' scope, especially for training or equipment purchases.
- 4. **Expense Category:** Indicate which expense category (Training, Transportation and Food, Equipment, and Supplies) each item falls under. This helps streamline the verification process.
- 5. **Attestation:** Each reimbursement request will include an online attestation statement confirming that all expenses for which reimbursement is sought were incurred exclusively for costs associated with performing honor guard burial details or associated training. The grantee is responsible for maintaining adequate records to corroborate this attestation.
- 6. **Certification of Compliance:** By submitting the reimbursement request, the organization certifies that it and its representatives are not debarred or suspended by any state or federal agency.
- 7. **Other Documentation:** TDVS may require submission of any additional documentation related to the HGGP.

Ensure all documents are clear, legible, and correctly dated. Incomplete or unclear documentation may lead to delays or rejection of the reimbursement request.

# 6.4 Invoicing Guidelines

With a reimbursement system, your grant monitor relies on invoices to ensure that funds have been properly expended on eligible items or services. All invoices and reimbursement requests must be submitted to the designated grant monitor via the TDVS online portal at <a href="https://www.tn.gov/veteran/HGGP">www.tn.gov/veteran/HGGP</a>.

- 1. Invoice Components:
  - **Invoice Number/Reference:** Each invoice must have a unique number for tracking purposes.
  - Grantee Name

- **Grantee Tennessee Edison Registration ID Number:** Referenced in signed Grant Contract
- **Grantee Remittance Address or Direct Deposit Information:** Include information for the preferred payment method, either a physical address for checks or direct deposit details.
- Grantee Contact for Invoice Questions: Name, Phone, or E-mail
- **Grantor:** Veterans Services
- **Grantor Number**: Assigned by the Grantee to the above-referenced Grantor.
- **Date:** The date on the invoice must be after the contract is signed and prior the contract end date.
- **Invoice Period**: First of the month, or when contract was signed, and the last day of the month.
- **Grant Contract Number:** Provided in signed document.
- Itemization of Reimbursement Requested for the Invoice Period— it must detail, at minimum, all of the following:
  - The amount requested by Grant Budget line-item: including any travel expenditure reimbursement requested and for which documentation and receipts.
  - The amount reimbursed by Grant Budget line-item to date.
  - The total amount reimbursed under the Grant Contract to date.
  - The total amount requested (all line-items) for the Invoice Period.
  - TDVS cannot accept pro forma invoices (invoices that are created at the point of sale as a draft, not a final invoice), sales quotes, or purchase requests in lieu of actual invoices. If this type of documentation is submitted, you will be asked to provide an actual invoice.
- 2. **Receipts:** Original itemized receipts or invoices that are date, service agreements or contracts, and photographic or video proof, if applicable, are required for reimbursement.
- 3. **Ineligible Items:** Mark out and initial any ineligible items on the invoice. The grant monitor will only process reimbursement for eligible items.
- 4. **Encumbered Funds:** If you do not have invoices that are dated on or before your grant contract end date, you will be asked to provide documentation to show that your funds have been encumbered. Your grant monitor will need documentation to show that the funds were at least encumbered by the contract end date.

Invoices that fail to meet these guidelines will delay the reimbursement process and may result in non-payment. Always consult these guidelines before submitting an invoice for reimbursement.

# Part 7 Monitoring and Compliance

This section focuses on the various checks and measures to ensure that funds disbursed under the HGGP are used appropriately. This includes regular compliance checks, financial audits, and reporting requirements that grantees must adhere to.

Grantee monitoring and financial auditing are different processes. Monitoring ensures compliance with the terms of the grant contract while an audit evaluates the general fiscal and operational health of the grantee organization.

### 7.1 Grantee Monitoring

- 1. **Quarterly Review:** The Tennessee Department of Veterans Services will perform random quarterly compliance checks to ensure that funds are being utilized according to the guidelines and objectives of the Honor Guard Grant Program.
- 2. **Spot Checks:** In addition, TDVS reserves the right to perform unannounced spot checks to validate the information submitted during the reimbursement process. During these checks, TDVS will also reassess the organization's continued eligibility to participate in the HGGP. (See 8.1)
- 3. **Submission Verification:** Each reimbursement request is subject to verification for its accuracy and alignment with the grant's purpose. Non-compliance will trigger further investigation.
- 4. **Non-compliance Consequences:** Failure to comply with the guidelines may result in temporary suspension of grant activities, withholding funds, or termination of the grant contract.
- 5. **Notification:** Organizations will be informed in writing of the outcome of each compliance check, including any areas requiring remedial action.
- 6. **Remedial Actions:** Organizations found to be non-compliant will be given a defined period to correct the issues identified. Please comply within this period to avoid further actions, including disqualification from current and future grant cycles.

7. **Certification Requirement:** Upon each compliance review, a certification from the organization's head confirming adherence to the grant terms and conditions may be required.

#### 7.2 Financial Audits

The integrity of the Honor Guard Grant Program (HGGP) relies heavily on all participating organizations' honest and compliant behavior. Adherence to guidelines or misuse of funds jeopardizes the organization's standing and could imperil the entire program.

While the Comptroller's Office primarily conducts audits in cases of suspected misuse or abuse of state funds, they also have the authority to perform random audits to ensure program integrity. Organizations should operate under the assumption that their financial activities will be scrutinized and should, therefore, maintain meticulous records.

For any questions concerning compliance or the audit process, please refer to this manual's "Contact Information" section or directly consult with the Tennessee Department of Veterans Services.

#### **Compliance Certification**

At the close of the grant period, grantee must submit a Compliance Certification Form. This form will attest to the organization's adherence to all guidelines and proper use of grant funds. It will also serve as the final reporting requirement before the closure of the grant cycle.

# **Part 8 Additional Considerations**

#### 8.1 Record Retention and Access to Records

Organizations must keep all HGGP grant records on file for <u>a minimum of five (5) years</u>. This includes a copy of your application, a copy of your contract, copies of all invoices, reports, correspondence, and any other programmatic and financial documents associated with your HGGP grant.

The State of Tennessee and TDVS shall have the right to access any applicable books, documents papers, invoices, receipts, reports, or other records of the grantee that pertain to, support, or document the HGGP funds for monitoring, auditing, or examination purposes. The right of access shall not be limited to the retention period, but shall extend as long as the records are retained by the organization.

#### 8.2 Public Record

Any information submitted by the VSO may be considered public record and will be subject to disclosure to the public as required by Tennessee law. By submitting an application for a grant, applicants agree to allow the use of applicant and grant information as provided in the application and grant documents to be published or distributed in various print or electronic media publications.

The application is also subject to the State of Tennessee's applicable laws governing the public disclosure of personally identifiable information, which are set forth in Tennessee Code Annotated section 10-7-504(a)(29). Pursuant to Tennessee Code Annotated section 10-7-503(a)(5), "information made confidential by State law shall be redacted whenever possible, and the redacted record shall be made available for inspection and copying."

#### 8.3 Title VI Nondiscrimination

By signing the grant contract, the grantee agrees, warrants, and assures that no person shall be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination in the performance of this Grant Contract or the employment practices of the Grantee on the

grounds of handicap or disability, age, race, color, religion, sex, national origin, or any other classification protected by Federal, Tennessee State constitutional, or statutory law.

### 8.4. Non-Compliance/Termination

TDVS will impose sanctions in the event of any noncompliance or violation of any grant provision by the grantee. Appropriate sanctions may include, but are not limited to, withholding payments, suspension, or termination of a portion or the entire grant. TDVS will provide 30 days' notice to the grantee if the grant is terminated for "convenience." Grants terminated for "cause" will take effect immediately. Both options are located in Section D of the grant contract under "Standard Terms and Conditions." If the grant is terminated, the grantee will be paid only for activities/services allowable under the grant contract that were completed prior to the effective termination date.

### 8.5 State Regulations

#### **Tennessee Code Annotated**

The HGGP is primarily regulated by Tennessee Code Annotated, Title 4, Chapter 3, Part 25. This legislative framework establishes the basic parameters for the program, including eligibility criteria and funding allocations.

#### **Tennessee Department of General Services - Central Procurement Office**

The Department of General Services' Central Procurement Office establishes rules and policies for the procurement of goods and services in the State of Tennessee. These rules and policies can be found here: Department of General Services' Central Procurement Office

#### **State Compliance Requirements**

- 1. **Organizational Status**: Must be registered with the Secretary of State.
- 2. **Financial Audits**: Subject to audits by the Comptroller's audit team, both random and triggered by suspicions of misuse or abuse.
- 3. **Monthly Reporting**: As detailed in Section 7.3, monthly reports must be submitted to maintain grant eligibility.

4. **Confidentiality**: While this program has no specific state-level confidentiality requirements, general state laws concerning proprietary information apply.

# 8.6 Federal Regulations

#### **IRS Section 501(c)(19)**

To be eligible for HGGP, an organization must be tax-exempt under Section 501(c)(19) of the U.S. tax code. This section typically applies to veterans' organizations, including posts or auxiliaries of war veterans and organizations of past or present Armed Forces members.

#### National Defense Authorization Act for Fiscal Year 2000, Public Law 106-65

The definition of a "qualifying veteran" is outlined in this federal law. It stipulates who is eligible for a military funeral honors ceremony and, thereby, under what conditions an honor guard service can be considered for reimbursement under HGGP.

#### **Federal Acquisition Regulation 52.209-5**

By signing the grant application, the applicant certifies that they are not debarred, suspended, proposed for debarment or suspension, or declared ineligible for an award by any federal agency.

#### **Federal Mileage Rates**

Travel reimbursement will be based on the federal allowance rates. The address registered with the IRS and Secretary of State will be used to calculate these amounts.

# Part 9 Dispute Resolution

This section outlines the established procedures and points of contact for resolution of disputes related to any unfavorable grant decision. Adherence to these procedures ensures fair treatment and clear communication channels for all involved parties.

In the event that a grant applicant or authorized representative wishes to contest the denial of a grant, in whole or in part, the following three-step process shall be used:

- 1. **Informal Review**: Contact the Grant Monitor to discuss the unfavorable decision. The grant monitor will explain the reason for denial and inform the applicant of any documentation that may be submitted to support a favorable decision.
- 2. **Request for Reconsideration**: Submit a written request for reconsideration, stating the reason(s) why the grant should have been awarded, and provide any supporting documentation. A designated official within the department will review the request and issue a formal written decision within ten (10) business days of the receipt of the request.
- 3. Commissioner Review: Submit a written request for Commissioner review, stating the reason(s) why the previous decision was erroneous, and provide any supporting documentation. The request for Commissioner review must be submitted within fourteen (14) business days from the date the Step II decision is received. The Commissioner will review and issue a written decision within fourteen (14) business days of receipt of the Step III request.

All requests may be submitted to <u>TDVS.Grants@tn.gov</u>. Written requests may also be sent via mail to:

Tennessee Department of Veterans Services 312 Rosa L. Parks Ave 13<sup>th</sup> Floor, Veterans Services Nashville, TN 37243

# Part 10 Amendments and Updates

This section describes the procedures for amendments to this manual and how stakeholders will be notified about such changes. Amendments may be necessary to align the manual with new legislation, resolve ambiguities, or clarify existing provisions.

#### 10.1 Process

Amendments to this manual can be initiated by the Department of Veterans Services or upon recommendation from stakeholders, including grantees and auditors. All proposed amendments will undergo an internal review for approval. The Commissioner of Veterans Services holds the final authority on any changes made to this manual.

- 1. **Proposal:** Amendments can be proposed by internal TDVS staff or external stakeholders. All proposals must be submitted in writing to TN.Veterans@tn.gov.
- 2. **Review:** The proposed amendments will be reviewed by a designated committee within the TDVS, which may consult legal advisors as necessary.
- 3. **Approval:** After review, the committee will recommend whether the amendment is adopted by the Commissioner, who has the final say.
- 4. **Documentation:** Once approved, the amendment will be documented and inserted into the manual in the appropriate section.

# 10.2 Notification

Once an amendment is approved and documented, notification stakeholders will receive a notification cation process as follows:

- 2. **Email:** All registered stakeholders will be emailed detailing the change. The amended manual will be uploaded to the TDVS website, replacing the previous version.
- 3. **Public Notice:** Depending on the significance of the amendment, a public notice may also be issued.

All stakeholders must stay informed about amendments, as they are binding and take effect immediately upon notification unless otherwise stated.

# **Part 11 Frequently Asked Questions**

This section addresses common questions that stakeholders may have regarding the Honor Guard Grant Program (HGGP). It aims to clarify uncertainties and offer immediate answers to frequent inquiries. Stakeholders are encouraged to consult this section before reaching out with questions.

### 11.1 Eligibility and Application

Q1: Who is eligible to apply for the Honor Guard Grant Program?

A1: Veteran service organizations (VSOs) registered with the Secretary of State and who meet the criteria outlined in Section 3 of this manual are eligible to apply.

Q2: Can we apply for multiple grants in one fiscal year?

A2: Organizations can submit multiple applications, but the total maximum liability per organization is \$7,500.

Q3: What is the grant application, and is it mandatory?

A3: The grant application is a crucial document that formally initiates your organization's request for grant funds. It is mandatory for funding as it provides TDVS with essential information about your organization, including its name, contact details, the scope of honor guard activities, and the estimated amount of funding required. This application is the basis for eligibility assessment and subsequent contract execution.

Q4: Do we need to be set up as a vendor in Edison before applying?

A4: Vendor setup in Edison is required before you can receive reimbursements. This should be completed after your grant application approval and before the grant period starts.

Q5: What if our organization is not a § 501(c)(19)?

A5: Only organizations that are § 501(c)(19) or federally chartered veteran service corporations are eligible. Refer to Section 3 for complete eligibility criteria.

Q6: How are grant recipients selected?

A6: All applications go through a review process by TDVS. Awards are subject to available funds and are at the discretion of TDVS.

Q7: How will we know if our application is approved or rejected?

A7: You will be notified via the contact information provided in your application.

Q8: Can we appeal if our application is rejected?

A8: The guidelines for appeals are outlined in the 'Conflict Resolution' section 8 of this manual.

Q9: Are there penalties for late submissions for applications or required documentation?

A9: Late submissions may not be considered for grant awards or reimbursements. It's essential to adhere to the timelines specified in the manual.

# 11.2 Funding and Reimbursement

Q10: What are the funding limits per organization?

A10: The total allocation cap is \$7,500, with sub-limits for training, transportation, food, and equipment expenses. Refer to Section 6.1 for specific caps.

Q11: What documents are needed for reimbursement?

A11: Original itemized receipts or invoices, service agreements or contracts, and photographic or video proof, if applicable. More details can be found in Section 6.3.

Q12: Can funds be used for administrative or overhead costs?

A12: No, the grant funds are strictly for offsetting expenses related to providing honor guard burial details. These include costs for training, transportation, food, equipment, and supplies.

Q13: How do we calculate transportation and food costs for reimbursement?

A13: Transportation costs are reimbursed based on the federal allowance rates. Ensure your organization's address is registered correctly with the IRS and Secretary of State, as these rates will be calculated based on that address. Food and travel costs are covered under the per diem of \$50 per individual.

Q14: What forms of proof are acceptable for reimbursement?

A14: Original itemized receipts or invoices, service agreements or contracts, and photographic or video proof, if applicable, are required for reimbursement.

Q15: What happens if we use only some of the grant funds?

A15: All grant funds should be used for expenses directly incurred in performing honor guard services or related training. This grant is on a first come first serve basis of up to \$7,500 per grantee.

Q16: Are there any restrictions on the equipment and supplies that can be purchased?

A16: Equipment and supplies must be directly related to the honor guard services. For a detailed list, refer to Section 6.1.

### 11.3 Compliance and Reporting

Q18: Are there any reporting requirements?

A18: Yes, monthly status reports are required. Additional details are in Section 7.3.

Q19: What are the consequences of non-compliance?

A19: Non-compliance with the grant's terms and conditions may result in termination of the grant, return of disbursed funds, and exclusion from future grant cycles.

Q20: How do we report our grant usage?

A20: Monthly status reports are required under Monitoring and Controlling, as Section 7.3 of this manual outlines.

Q21: How often are compliance checks conducted?

A21: Compliance checks are conducted randomly by TDVS.

#### 11.4 Miscellaneous

Q22: How long does it take to process a reimbursement?

A22: The standard processing time is 30 business days.

Q23: What happens if we encounter issues or conflicts during the grant period?

A23: For conflicts or challenges, consult the Tennessee Department of Veterans Services Commissioner for resolution as outlined in Section 9.

Q24: How do we know if we've been selected for a financial audit?

A24: You will be notified by the Tennessee Comptroller if your organization is selected for an audit. Audits are performed by the Comptroller's audit team, as explained in Section 7.2.

Q25: What happens if laws or regulations change?

A25: Amendments to the manual will be made as necessary to comply with new laws or regulations. Stakeholders will be notified as outlined in Section 10.

Q26: Who do we contact for more information?

A26: For any questions or clarifications, please get in touch with HGGP staff. The official contact email is TN.Veterans@tn.gov, as specified in the manual.

Q27: What's the process for amendments to the grant, such as budget changes?

A27: For any amendments, consult this manual's 'Amendments and Updates' section (Section 10) for the proper procedure and notification requirements.

Q28: Can one organization apply for multiple grants?

A28: An organization can submit multiple reimbursement requests once per month, but the total allocation cap per organization per fiscal year is \$7,500.

Q29: Who can we contact for technical issues during the application process?

A29: For any technical issues, contact HGGP staff email at TN.Veterans@tn.gov.

Q30: What should we do if there are changes in our organization's contact information?

A30: Any changes in contact information should be promptly updated in the Edison system and communicated to TDVS.

# Part 12 Appendices

This section contains supplementary material to assist stakeholders in navigating the Honor Guard Grant Program (HGGP). It includes contact information, sample forms, and a glossary of terms to understand the program comprehensively.

# 12.1 Contact Information

This subsection provides the essential contact points for inquiries, technical assistance, and dispute resolution related to the HGGP.

• General Inquiries and Application Process:

**Contact: HGGP Staff** 

**Email:** TDVS.Grants@tn.gov

Technical Issues:

Contact: HGGP Staff

**Email:** TDVS.Grants@tn.gov

• Compliance and Reporting:

**Contact: HGGP Staff** 

**Email:** TDVS.Grants@tn.gov

• Financial Audits:

Contact: TN Comptroller Audit Division Email: <a href="mailto:comptroller.state.audit@cot.tn.gov">comptroller.state.audit@cot.tn.gov</a>

• Conflict Resolution:

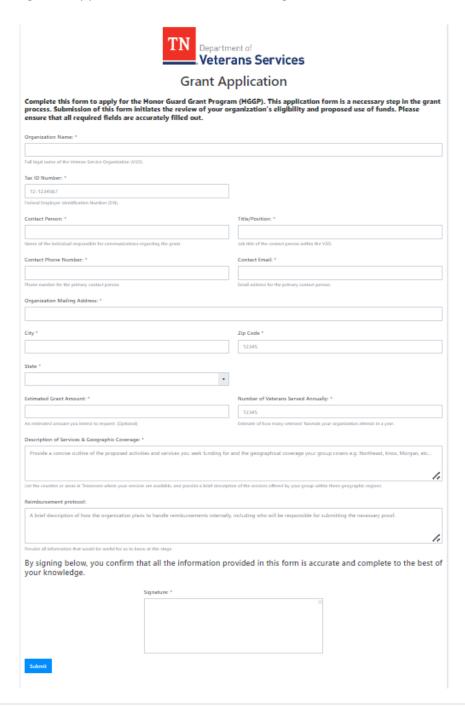
**Contact: Tennessee Department of Veterans Services Commissioner** 

Email: TDVS.Grants@tn.gov

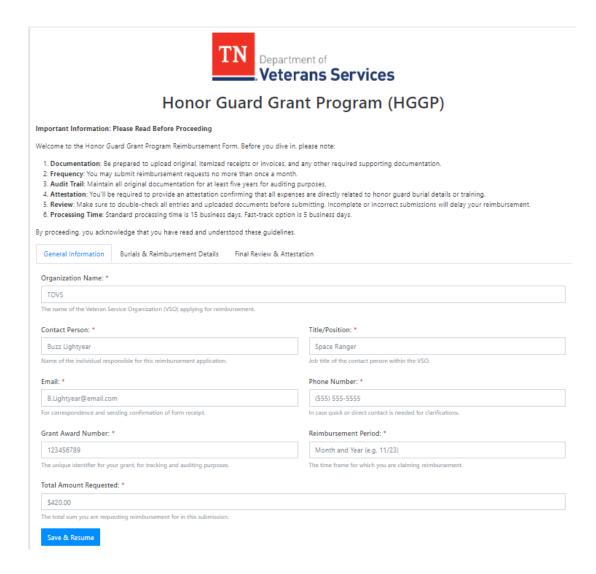
# 12.2 Sample Forms and Templates

This subsection provides sample forms and templates that stakeholders may find helpful in the application and reporting processes for the HGGP. These templates are designed to streamline the program's administrative aspects and ensure submission consistency.

• **Grant Application:** A sample of the online form provided to assist organizations in preparing their application for the HGGP funding.



• Reimbursement Request and Monthly Status Report Form: A sample of the online form designed to simplify the process of requesting reimbursements for eligible expenses and fulfilling their monthly reporting requirements.



General Information Burials & Reimbursement Details Final Review & Attestation

#### **Burial Services**

#### **Rurial Services Conducted**

Please enter the total number of burial services conducted by your organization during the reimbursement period. For each burial service, ensure you have a completed and signed roster detailing the participation of each Honor Guard member. Please upload these rosters in the 'Burial Rosters' section below.

#### Number of Burials During Reimbursement Period

10

Please enter the total number of burial services conducted by your organization during the reimbursement period.

#### **Burial Rosters**

Select files...

Drop files here to upload

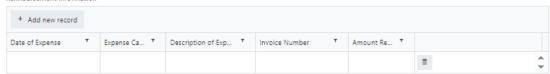
#### Reimbursements

#### Reimbursement Expense Table Instructions and Document Attachments

Use this data table to list each expense for which you are seeking reimbursement. Make sure to fill in all required fields for each entry. To add more lines for additional expenses, click the '+' button at the top of the table.

For each expense listed, attach the required supporting documents such as itemized receipts, service agreements, or contracts. Each file should be named according to the expense it corresponds to, for easier cross-referencing. For example, if you have a transportation expense listed, name the supporting document 'Transportation\_Expense\_MMDDYY'. Ensure all files are clear and legible.

#### Reimbursement Information



#### Supporting Documents \*

Select files...

Drop files here to upload

General Information	Burials & Reimbursement Details	Final Review & Attestation		
Summary of Total Reimbursement Request				
\$86.74				
Auto-calculated total sum o	of all the expenses listed in the expense tabl	e.		
Attestation and Signat	ure:			
By signing below, lightest that all expenses listed are accurate and were incurred while performing honor guard burial details or related training. Lunderstand it is my				

By signing below, I attest that all expenses listed are accurate and were incurred while performing honor guard burial details or related training. I understand it is my responsibility to keep records that corroborate this attestation for a minimum of five years for auditing purposes.

Additional Notes or Comments:

• **Honor Guard Burial Service Reimbursement Request Form:** The Honor Guard Burial Service Reimbursement Request Form is a mandatory form that records the organization's name, date and location of the burial service, the veteran honored, and details of each participating honor guard member, including their role and signature.

Honor Guard Grant Program Burial Service Roster			
Organization Name:		Date of Service	
Veteran Honored:		Locatio Service	
Name of Funeral Home:		Funeral Director Printed Name:	
Funeral Director Signature:		Date:	
Name of Honor Guard Member	Role (e.g bearer, b		Signature of Honor Guard Member
Tennessee Department of Veterans Services 312 Rosa L. Parks Blvd. Nashville, TN 37243			TN Department of Veterans Services

These forms and templates are available to view or download on the TDVS website or requested via email at TDVS.Grants@tn.gov.

# 12.3 Glossary of Terms

- **Appropriations:** Funds allocated by the legislative body for specific uses; in this context, funds earmarked for the HGGP.
- **Compliance Checks:** Periodic reviews conducted by TDVS to ensure organizations are adhering to the grant guidelines.
- **Comptroller's Audit Team**: The body responsible for conducting financial audits to ensure proper use of grant funds.
- **Dispute Resolution:** The formal process for resolving disputes or challenges related to the HGGP.
- **EIN (Employer Identification Number):** A unique identification number the IRS assigns to organizations for tax purposes.
- **Edison System:** The vendor registration system where organizations must be set up to receive reimbursements.
- **Financial Cap:** The upper limit of funding allocated to a VSO within a fiscal year under the HGGP.
- **Fiscal Year:** One year for budgeting and financial reporting, as defined by the state.
- **Itemized Receipt:** A document detailing the goods or services purchased, with individual costs for each.
- **Military Funeral Honors Ceremony:** A ceremony conducted for a deceased veteran, including folding and presenting the United States flag and playing "Taps."
- **Monitoring:** The process of overseeing the grant's activities and performance to ensure compliance with guidelines.
- **Per Diem Rate:** A daily allowance for food and travel expenses, set at \$50 per person participating in the honor guard detail.
- **Public Law 106-65:** National Defense Authorization Act for Fiscal Year 2000 sets the guidelines for eligibility for military funeral honors.

- **Qualifying Veteran:** A deceased veteran is eligible for a military funeral honors ceremony per Public Law 106-65.
- Reimbursement Request Form: Organizations must fill out the online form to request reimbursement for eligible expenses.
- **Selected Reserve:** Members or former members described in section 2301(f) of title 38, United States Code, typically part of the reserve components of the Armed Forces.
- **Stakeholders:** Parties interested in the HGGP, including VSOs, TDVS, and veterans.
- **Vendor:** An organization or individual providing goods or services to the state registered in the Edison system in this context.
- **Veteran:** An individual who has served in the active military, naval, or air service and was discharged or released under conditions other than dishonorable.
- **VSO (Veteran Service Organization):** An organization registered with the Secretary of State that provides various services to veterans, including honor guard burial details.

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