

## VHA GENERAL POST FUNDS - GIFTS AND DONATIONS

- 1. REASON FOR ISSUE:** This Veterans Health Administration (VHA) directive defines VHA policy regarding gifts and donations as well as proper and efficient operation of General Post Funds (GPF) and accounts regarding donations.
- 2. SUMMARY OF MAJOR CHANGES:** This VHA directive has been revised to update the following: references, nomenclature and office mail codes, deadlines for the disposition of donations, and incorporating the prior VHA Handbook 4721 with updates to definitions, references, procedures for acceptance and management of gifts and donations, and GPF operational activities.
- 3. RELATED ISSUE:** None.
- 4. RESPONSIBLE OFFICE:** The VHA Chief Financial Officer (10A3), VHA Central Office, is responsible for the contents of this directive. Questions may be addressed to the VHA CFO Accounting Policy Office (10A3A) at 202-461-1099.
- 5. RECISSIONS:** VHA Directive 4721, dated May 24, 2007, and VHA Handbook 4721, dated May 24, 2007, are rescinded.
- 6. RECERTIFICATION:** This VHA directive is scheduled for recertification on or before the last working day of August 2023. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

Richard A. Stone, M.D.  
Executive in Charge

**NOTE:** *All references herein to VA and VHA documents incorporate by reference subsequent VA and VHA documents on the same or similar subject matter.*

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## VHA GENERAL POST FUNDS - GIFTS AND DONATIONS

### 1. PURPOSE

This Veterans Health Administration (VHA) Directive defines VHA policy regarding gifts, donations, and General Post Fund accounts. **AUTHORITY:** Title 31 United States Code (U.S.C.) 1321(45); 31 U.S.C. 8301.

### 2. BACKGROUND

a. The General Post Fund (GPF) is a trust fund authorized by 31 U.S.C. 1321(45). Monies in trust funds are held to be disbursed in compliance with the terms of the trust. GPF funds are appropriated funds per 31 U.S.C. 1321(b)(1). The Secretary of Veterans Affairs is authorized to deposit funds in the GPF under the authority of 38 U.S.C. Chapters 83 and 85.

b. GPF funds must be deposited and allocated to the appropriate funding accounts established by the VHA Office of Finance to provide accountability in the Department of Veterans Affairs (VA) financial management system of records. The three funding accounts are:

- (1) 8180S (Specific),
- (2) 8180G (General), and
- (3) 8180A (Allocation).

**NOTE:** For more details on each of these accounts, see Appendix A.

### 3. DEFINITIONS

a. **Allocation.** An allocation is the process by which funds are made available by management, or the budget office, for use in program or operating activities.

b. **Bequest.** A gift of personal property, such as money, stock, bonds, or jewelry, owned by a decedent at the time of death which is directed by the provisions of the decedent's will.

c. **Delegation of Authority.** A delegation of authority is the formal transfer of an authority to make certain actions or to make certain decisions, which have legal or administrative significance. Delegation is generally to the position and not to an individual.

d. **Devise.** To give or leave real property by will upon the owner's death.

e. **Donation.** A donation is a gift: see "Gift," below.

f. **E-Donate.** The platform that allows for electronic donations to be received through <https://pay.gov/paygov/> that is recorded and credited to the appropriate GPF

account as prescribed by VHA Financial Policies and Procedures. **NOTE:** See Appendix D for E-Donate Standard Operating Procedures.

g. **Expendable Property.** Property valued at less than \$300 and with a useful life of less than 2 years.

h. **Gift.** A gift is the gratuitous transfer of ownership without consideration consisting of (a) the Donative Intent, (b) Transfer of Title or Ownership, and (c) Donee acceptance. Gifts or donations may be cash, services, gifts-in-kind, personalty, or realty, including bequests and devises.

i. **Issuance Document.** The issuance document is prepared when gifts are recorded in the facility's accountability records stating a gift has been received, its donor, and the purpose of the gift.

j. **Members.** Members are individuals in Department of Veterans Affairs (VA) care other than medical center inpatients. Members include outpatients, homeless Veterans, Veteran residents in domiciliaries or community living centers, caregivers of Veterans, and other eligible beneficiaries, who are being treated in VA facilities.

k. **Solicited Funds.** Solicited funds are funds collected and/or donated as a result of efforts by VA officials to make the public aware of VA's willingness to accept gifts and VA's gift needs. **NOTE:** *The authority of the Secretary of Veterans Affairs to accept gifts includes the implicit authority to solicit for them. A gift need not be accepted. For example, if the agency cannot use a gift, it should be rejected.*

#### 4. POLICY

It is VHA policy that the Secretary of Veterans Affairs, the Under Secretary for Health, or the VACO GPF Review Committee must authorize the use of funds in the GPF 8180(G)eneral account for VHA field facilities or activities . This does not apply to 8180(G) accounts in the field. *All gifts and donations and GPF-related expenditures incurred must comply with established VA financial policy and procedures including those set forth in this directive. Specific/Directed/Restricted [synonymous terms] donations similarly must be deposited in 8180(S)pecific accounts, either VACO GPF 8180(S) [Specific/Directed/Restricted] or local VISN/VAMC 8180(S)pecific accounts to be used in accordance with the Donor's intent and stated restrictions.*

#### 5. RESPONSIBILITIES

##### a. **Under Secretary for Health.**

(1) The Under Secretary for Health, or designee, is authorized to accept gifts for the benefit of inpatients and members of VA medical facilities, and for the benefit of one or more VA medical facilities. (**NOTE:** *Once the Fisher House Foundation, Inc. builds a Fisher House and turns it over to VA, the given medical center assumes responsibility and though a Fisher House is a temporary lodging facility, it would appear as a budget line item in the medical center's accounts.*)

**NOTE:** VA may accept gifts and donations only because Congress gave the agency the explicit statutory authority to do so codified at 38 U.S.C. 322(b)(5), 521(b), 2406-2407, 7802(h), 8103, 8104(e), and 8301, and 5 U.S.C. 4111(e).

(2) The Under Secretary for Health, or designee, is responsible for ensuring the:

(a) Acceptance of Gifts and Donations. Gifts and donations must be accepted or rejected in an appropriate, timely, and documented manner:

1. VHA employees may not accept gifts or donations unless they have delegated authority as designated in this directive or elsewhere.

2. The Secretary delegated his gift acceptance authority under 38 U.S.C. 8301 to Deputy Secretaries, Assistant Secretaries, and Other Key Officials via Memorandum dated September 10, 2005 under his authority codified at 38 U.S.C. 512.

3. Gifts of space, property, or major construction may only be accepted by the Secretary of Veterans Affairs or by those agency officers or employees with properly delegated authority (see below). Requests for using non-directed, general gifts deposited in the VACO GPF must be forwarded through the appropriate organizational channels to the VA Central Office GPF Review Committee for submission to the Under Secretary for Health.

4. VHA employees may not accept gifts on the agency's behalf unless they have the delegated authority to do so as outlined in this policy. VHA employees who do not have authority to accept gifts should generally refer all questions of offers of gifts or donations Voluntary Services (VAVS) to determine whether a gift can be accepted, by whom, and where.

5. VHA employees may not accept gifts in return for VA endorsements of, or testimonials for, any product or commercial line of endeavor.

6. If a donor does not intend to relinquish all control over the future use of the donated property, either personalty or realty, the donor's intent must be set forth in a Memorandum of Agreement (MOA) to which the VHA accepting official agrees. VA employees may accept temporary use of property for a set period of time without charge to VA as well as low-cost leases of capital equipment. MOAs may be used to delineate both the donor's and the agency's intentions and understandings regarding a gift.

7. Devises and bequests, if administratively acceptable, are referred to the appropriate District Chief Counsel in the Office of General Counsel to determine legal acceptability. Local counsel will process bequests or devises according to applicable state law. No commitment to accept the devise or bequest may be made until a legal opinion has been obtained from the OGC.

8. OGC can provide guidance on how to proceed and whether a gift can be accepted. If a gift involves either a bequest or a devise to VA, a potential gift of cash or personalty or realty under someone's Last Will & Testament or Testamentary Trust, OGC can help determine whether the bequest or devise can or should be accepted, and

then, district counsel will be assigned to work with the decedent's Estate or Trust since they will be more familiar with local jurisdictions' practices, laws, and procedures. VACO OGC may be consulted as necessary.

(b) Disposition of Donations. All monetary donations to the GPF must be deposited within 2 business days of receipt or as soon thereafter as possible. The Agent Cashier is responsible for ensuring the deposit is made in accordance with Financial Policies and Procedures Volume VIII, Chapter 3, Agent Cashier Accountability Policy, available at <https://www.va.gov/finance/docs/VA-FinancialPolicyVolumeVIIIChapter03.pdf>. Outside accounts (e.g., banks or credit union accounts) may not be used to maintain GPF funds. See Treasury Financial Manual (TFM) Part 5 Chapter 4100, Requirements for Using Depositories to Hold Public Money, available at: <https://tfm.fiscal.treasury.gov/v1/p5/c410.html>.

(c) Solicitation of Contributions. VA's express statutory authority to accept gifts under 38 U.S.C. 8301 includes the implied authority to solicit gifts, see *Authority to Solicit Gifts; Memorandum Opinion for the Director, Office of Government Ethics*, Attorney General, Office of Legal Counsel, January 19, 2001, and also *VAOPGCPREC 2-2015, Authority to Solicit Gifts under 38 U.S.C. 8301*, March 20, 2015.

(d) VHA officials who have delegated authority to accept gifts may:

1. Take action to raise the public's awareness of VHA's willingness to accept gifts and the productive use of GPF gifts; and may delegate their authority to raise the public's awareness to other VHA management employees.

2. Communicate VHA gift needs to potential donors.

3. Caveat: To avoid ethics violations, solicitations may not include participation in or support of a third party's fundraising initiatives or include lobbying, grassroots or otherwise. The Ethics Specialty Team (EST) in OGC should be consulted regarding these issues.

(e) Appropriate VA Official Travel. Travel for VA employees may be paid for in whole or in part in certain circumstances by GPF funds as noted below. Government ethics rules apply to acceptance of gifts for travel. VA may accept travel funding from non-Federal sources in accordance with 31 U.S.C. 1353, as implemented by the Federal Travel Regulations in 41 C.F.R. Chapter 304.

1. VA employees may accept training and related expenses under 5 U.S.C. 4111 if the donor is a 501(c)(3) entity. Gifts of travel from non-Federal sources must be approved by appropriate VA officials through VA Form 0893. The Ethics Specialty Team (EST) in OGC may advise regarding gifts of travel to individual employees.

2. Official travel to attend a meeting or similar function. See the VA Employee Travel Management Manual (currently Financial Policies and Procedures, Vol. XIV, Chapter 9) for Department policy on VA or VA employees accepting gifts for official

travel to attend a meeting or similar function. **NOTE:** "Meeting or similar function" is defined in title 41 Code of Federal Regulations (CFR) 304-2.1.

3. Official travel other than to attend a meeting or similar function. For support of official travel other than to a meeting or similar function, authorized VHA officials may accept gifts to VA for official travel to conduct Government business, but only for attendance at, or participation in, an event relating to the employee's official duties and only if the gifts are:

a. In compliance with the designated purpose of the donor (if the donation is designated for a research or education project, only that portion identified by the donor as appropriate for travel by VA staff members may be used for travel) or,

b. For conducting VA National Rehabilitation Special Events or otherwise for the direct benefit of VA patients or members (e.g., travel accompanying a patient).

(f) Liquidation of Donated Property Not Needed for VA Purposes. In accordance with 38 CFR 12.22, any assets accruing to the GPF, including stocks, bonds, and similar instruments, must be sold or otherwise converted to cash. Any such property received as general or specific donations must be redeemed in accordance with 38 CFR 12.19-23. **NOTE:** *Although this provision addresses assets accruing to the GPF in cases when Veterans die in VA facilities without heirs or next of kin, these procedures also apply when property is donated to VA.*

b. Office of Finance. The VHA Office of Finance is responsible for establishing and maintaining current policy, procedures, and other requirements governing GPFs.

c. VA Central Office General Post Fund Review Committee.

(1) The VA Central Office GPF Review Committee is responsible for the review of all distributions of the national 8180(G) funds even if the Committee did not approve the distributions. The Committee may also approve distributions out of 8180G funds to VHA facilities or program offices. 8180G funds approved for distribution are distributed to station level 8180A accounts. **NOTE:** *Distributions approved by the Secretary of Veterans Affairs or the Under Secretary for Health do not require the approval of the GPF Review Committee.*

(2) The VA Central Office GPF Review Committee is comprised of VA Central Office Directors of Chaplain Service, Recreation Therapy Service, and Voluntary Service, or their designees. A VHA representative from the VHA Office of Resource Management serves as a non-voting, advisory member.

(a) The Chairperson of the GPF Review Committee rotates among the members on a biannual basis.

(b) To ensure the VA Central Office GPF Review Committee provides effective GPF stewardship, all VHA requests for distributions from the 8180G Fund must be routed through the Committee for review. Transitional Housing Programs. Allocation of GPF

monies to the VA Transitional Housing Program is not mandatory and is, therefore, subject to the approval of the GPF Review Committee.

d. **VA Medical Facility Fiscal or Finance Officer.** The VA medical facility Fiscal or Finance Officer is responsible for ensuring that the GPF accounts are maintained and operated in accordance with the procedures set forth in this directive. To prevent the loss of supporting documentation such as donor letters and other important information, facilities must maintain this documentation either as hard copy or in an electronic format (e.g., PDF files or SharePoint). Supporting documentation for gifts may be in the forms of acknowledgment/thank-you letters and/or Memoranda of Agreement (MOAs).

e. **VA Medical Facility Voluntary Service Officer/Program Manager.** The VA medical facility Voluntary Service Officer/Program Manager is responsible for ensuring that, except as otherwise provided in Appendix B, all donations and all applicable GPF accounts are used appropriately in accordance with donor intent and with all procedures set forth in this directive. Gifts for medical research must be congruent with an agency need or mission. Note: Donations for the construction or alteration of a medical facility are not accepted under 38 U.S.C. 8301 but would be accepted under 38 U.S.C. 8103, 8104.

f. **VHA Employees.** Except as specified in this directive, VHA employees cannot be authorized to accept or to solicit gifts and donations to VA without the appropriate, delegated authority. VA employees who do not have authority to accept or solicit gifts generally must refer all offers of gifts and donations to the Voluntary Service Officer/Program Manager to determine acceptability, and for proper record documentation and acknowledgement to the donor. Appendix B describes officials and employees authorized to accept gifts/donations to the agency.

## **6. DISBURSING AUTHORITY**

a. VHA utilizes the Automated Allotment Control System (AACS) to provide authority to expend GPF funds granted to field facilities. Funds are disbursed to the field in the 8180A and 8180S accounts. Supporting document(s) must indicate the amounts made available, any special purpose or restriction on the use of the funds, as well as the ACCs to be used for National Program allocations.

b. All funds for national events and programs must be deposited to the Program Code 9600 or 9700 series account according to instructions from the Office of Finance (10A3B) before the disbursement.

## **7. TRAINING REQUIREMENTS**

There are no training requirements associated with this directive.

## **8. RECORDS MANAGEMENT**

All records regardless of format (paper, electronic, electronic systems) created by this directive shall be managed per the National Archives and Records Administration (NARA) approved records schedules found in VA Records Control Schedule 10-1. If you

have any questions regarding any aspect of records management you should contact your facility Records Manager or your Records Liaison.

**9. REFERENCES**

- a. 31 U.S.C. 1321.
- b. 38 U.S.C. 8103, 8104, and 8301.
- c. 38 U.S.C. Chapters 83 and 85.
- d. 38 CFR Part 12.
- e. 38 U.S.C. 523
- f. 41 CFR Chapter 304.
- g. 41 CFR, Chapter 101.
- h. 5 U.S.C. Ch. 41.
- i. VA Directive 7531, Acquisition of Artwork, Decorative Furnishings, and Decorative Items, dated March 1, 2017.
- j. VHA Directive 1111, Spiritual and Pastoral Care Procedures, dated November 22, 2016.
- k. VHA Directive 1200.02, Research Business Operations, dated March 10, 2017.
- l. VHA Directive 1107, VA Fisher Houses and Other Temporary Lodging, dated March 10, 2017.
- m. VA Financial Policies and Procedures, Volume XVI, Chapter 2, Government Charge Card Program.
- n. VA Directive 0008, Developing Public-Private Partnerships with, and Accepting Gifts to VA from, Non-Governmental Organizations, dated May 29, 2015.
- o. VHA Manual M-8, Pt. V, Chapter 5, dated February 28, 1990.
- p. Financial Policies and Procedures, Volume I, Chapter 2, US Standard General Ledger.
- q. Financial Policies and Procedures, Volume I, Chapter 6, Reconciliations.
- r. Financial Policies and Procedures, Volume II, Chapter 1, VA's Accounting Classification Structure.
- s. Financial Policies and Procedures, Volume II, Chapter 6, Appendix A, 20. Non-Procurement Obligations.

t. Financial Policies & Procedures, Volume. V, Chapter 9 General Property, Plant, and Equipment.

u. Financial Policies and Procedures, Volume VIII, Chapter 3, Agent Cashier Accountability.

v. Financial Policies and Procedures, Volume VIII, Chapter 4, Personal Funds of Patients FOP.

w. Financial Policies and Procedures, Volume XIV, Chapter 9, Travel.

x. Treasury Financial Manual (TFM) Part 5 Chapter 4100, Requirements for Using Depositories to Hold Public Money.

**GENERAL POST FUND FINANCIAL OPERATIONS****1. GENERAL POST FUND ACCOUNTS**

GPF funds must be deposited and allocated to the appropriate funding accounts established by the VHA Office of Finance to provide accountability in the VA financial management system of record. GPF accounts are authorized at each VA medical facility. The three funding accounts are:

a. **8180S (Specific).** This Fund Account is for Donations for a Specific Purpose or to a Specific Facility; it was established for the distinct and separate financial reporting of restricted donations (gifts, bequests, devises, etc.) designated by donors for a specific purpose or a specific VA facility. This account is also used for general donations allocated by the Secretary of Veterans Affairs to a specific facility.

(1) **Specific or Restricted Donation.** A specific or restricted donation to the GPF is any gift, bequest, devise, or donation received by a VA official that the donor has specified the donation be used for the exclusive benefit of inpatients or members at one VA facility or for which the donor designated a specific use for the donation that may be intended for the agency at large.

(2) Donors may designate restricted funds for uses that do not directly benefit inpatients or members, and for purposes that cannot be funded by unrestricted funds. VA organizations other than VHA may accept gifts and donations under appropriate statutory authorities. For example, the National Cemetery Administration has specific gift acceptance authorities for the beautification or enhancement of national cemeteries, etc.

(3) Restricted donations must be documented with written instructions from the donor specifying the purpose for which the donation has been made, and originals or copies of this documentation is to be maintained by the fiscal activity because this documentation is required for fiscal reviews and audits. **NOTE:** *See this Appendix, paragraph 2.b.(1)(b). If this documentation cannot be obtained, consult with the appropriate District Counsel or the Office of Resource Management (10A3B) to determine if the donation can be accepted. This may be done through a Memorandum of Agreement (MOA) that sets out the parties' expectations and responsibilities. VACO OGC may be consulted if necessary.*

(4) Donations that are restricted by the donor only in that they are given to one or more specific facilities, but otherwise have no restrictions placed by the donor are treated as general donations for the purpose of determining how they may be used (i.e., they must be used for expenditures that directly benefit inpatients or members while receiving care or treatment from VA).

b. **8180G (General).** This Fund Account is for General Donations; it was established for the distinct and separate financial reporting of unrestricted donations, donations for non-VHA purposes, and interest income from Treasury investments.

This national account is maintained in Central Office. Local facilities may also have a General Purpose GPF for unrestricted donations. Medical facilities with a Fisher House must establish a Fisher House General Post Fund specifically to support VA Fisher House program operations and the needs of Fisher House guests.

(1) **General or Unrestricted Donation.** A general or unrestricted donation to the GPF is any remittance tendered to a VA official of a VA facility for the benefit of inpatients or members with no restrictions or designated uses placed on the donation by the donor. Funds received from these donations are available only for expenditures that directly benefit inpatients or members while receiving care or treatment from VA (with certain exceptions set forth in this directive).

**(2) The Following Collections, though Not Donations, Must be Handled and Processed in the Same Manner as General Donations.**

(a) The proceeds of the sale of personal property left on any VA facility or premise (including contract facilities) by a decedent who did not leave any survivors, next of kin, or heir, entitled under the law of their domicile, to personal property as to which the person died intestate (i.e., without a will) pursuant to 38 U.S.C. 8501.

(b) Any monies or proceeds of the sale of personal property left by a Veteran, or a dependent or a survivor of a Veteran, who dies while receiving care or treatment in a VA medical center or facility (including contract facilities) and whose property is vested in the United States pursuant to 38 U.S.C. 8520 (see title 38 C.F.R. 12.19-.22).

(c) The proceeds of the sale of unclaimed property, exclusive of government property, found on premises under VA control pursuant to 38 U.S.C. 8504.

(d) Any monies left or found upon any premise used as a VHA facility if the purpose or owner of the funds cannot be identified, provided the funds are held by the facility for 90 days in suspense account 3875 before expenditure in accordance with 38 U.S.C. 8504.

(e) The proceeds from the sale of GPF equipment and other property (i.e., articles of value received as a gift or bequest, or equipment and property previously purchased with GPFs).

(f) Funds of deceased patients deposited to the GPF in accordance with 38 U.S.C. 8520, and VA Handbook 4020, Personal Funds of Patients, dated October 17, 1994.

(g) Donations that are specific only in that they are donated for use at a specific facility but otherwise have no restrictions placed by the donor on VA's use of the funds are subject to the same rules as general donations with respect to how they may be used (see this appendix, paragraph 1).

**NOTE: Explanation of Restricted versus Unrestricted Funds.** *Restricted and unrestricted donations are accounted for using fund accounting principles. Accordingly, the terms "restricted" and "unrestricted" funds refer to the presence or lack*

*of restrictions placed on the funds by the donor. The terms can be confusing in that restricted funds may often be expended on events, services, and items for which unrestricted funds cannot be used. Any gift or donation must align with a licit agency function or mission. Gifts cannot be accepted for any purpose or function that the agency cannot carry out legally. Note: The GPF is a trust account to hold funds "in trust" to carry out Donors' intentions.*

c. **8180A (Allocation).** This Fund Account is for allocations; it was established for the distinct and separate financial reporting of unrestricted funds taken from general purpose account 8180G and allocated to VHA field facilities under the authority of the VA Central Office GPF Review Committee (GPFRC) in support of National Programs or as the GPFRC may deem appropriate for regional or specific requests. All allocations are designated and approved by the VA Central Office GPFRC, the Secretary of Veterans Affairs, and/or the Under Secretary for Health. Transfer of Disbursing Authority through the Automated Allotment Control System (AACs) is the medium used to allocate the funds to the field facilities. Donations received at the facility must not be recorded in the 8180A funding account.

## 2. REQUESTS FOR FUNDING FROM GENERAL DONATIONS

a. All requests for General Post Fund support from field facilities and VA Central Office program offices must be submitted in writing to the Office of Resource Management (10A3B) for referral to the GPFRC. Upon approval of a request, the GPFRC Chairperson directs the VHA Office of Resource Management (10A3B) to transmit funding.

b. National Programs requesting support from the GPFRC must submit their request for funding in the upcoming fiscal year to the Office of Resource Management (10A3B) by the required date as specified in the call memorandum. Submissions by memorandum with back up spreadsheets detailing expenses, desired quarterly distribution, and justification must be signed by the National Program Director or hosting facility Director. Notification of the disposition of requests is made by email by the GPFRC Chairperson.

c. Field facilities submitting funding requests for supplemental support to the initial annual allocation must submit their request, with a justification memorandum signed by the facility Director to the Office of Resource Management (10A3B). Requests received before the 10<sup>th</sup> of the month are included in the agenda of the next GPFRC meeting. The GPFRC Chairperson notifies the field site facility Director of the GPFRC decision.

d. A special request that occurs during the fiscal year follows the same guidelines as supplemental support.

e. **Distribution of Funds.** The GPFRC Chairperson directs the Office of Resource Management (10A3B) to transmit funding approved by the committee. The AACs issues a Transfer of Disbursement Authority (TDA) to the applicable program at undistributed level.

(1) Funding in support of the Initial Annual Allocation, supplemental to the Annual Allocation or special requests is allocated in 8180A.

(2) Funding in support of National Programs is allocated to the field in 8180A, after unique subaccounts are created within the facility 8180A account. The VHA Office of Resource Management (10A3B) provides any facility receiving such funds with the standardized accounting classification codes (ACCs) for these subaccounts prior to transmittal of the funding.

### 3. GENERAL POST FUND SUBSIDIARY LEDGER

a. The maintenance of subsidiary ledgers covering GPFs is the responsibility of the accounting activity.

b. The subsidiary accounts in the operating ledger are maintained in accordance with VA Financial Policies and Procedures, Volume 1, Chapter 6 [Reconciliations](#). The accounting section for each facility in receipt of GPFs is required to maintain separate and perpetual subsidiary ledgers for each fund account. Individual subsidiary ledgers are to be established and maintained for each 8180(S) fund account and each 8180(A) fund account. A separate Account Classification Code (ACC) will be established for each account.

c. At the end of each month, subsidiary accounts must be reconciled to all respective controlling accounts within the general ledger. Inaccuracies and discrepancies will be corrected promptly.

d. A separate ACC will be established for each capital improvement project authorized by VA Central Office for which funds are received.

e. Each facility must establish and maintain a separate account for the 8180A fund VA Central Office's allocation. This account receives all funding from VA Central Office. **NOTE:** *Donations will not be credited to this account.* VA Central Office will use this account for two purposes: to allocate unrestricted funds to field facilities that may be used as the facility Director, or designee, deems best (the annual allocation); and to allocate funds for national program activities, such as sporting and cultural events. Facilities must use the standardized ACCs communicated by VA Central Office along with each distribution of National Program funds.

f. One general purpose account (8180G) must be established and maintained for those donations defined in paragraph 1 of this appendix.

g. At the end of each accounting month, subsidiary accounts must be totaled, and the total reconciled with the balances in appropriate general ledger accounts. Any inaccuracies or discrepancies must be corrected promptly. Subsidiary accounts balances must be maintained and retained for audit purposes. The F827 detailed transactions report for treasury symbol 36X8180 SGL 4610 must be reconciled to the

subsidiary accounts. This monthly reconciliation is required per VA Financial Policies and Procedures, Volume I, Chapter 6 [Reconciliations](#).

h. An account for the funds or the proceeds from the disposition of other personal property for deceased Veterans will be established in the Veterans Personal Finance System (VPFS). If the next of kin cannot be determined, the proceeds will be transferred to general purpose account 8180G.

(1) The Administrative Officer of the Day (AOD) provides the Personal Funds of Patients (PFOP) Patient Funds Clerk a death notice. The PFOP clerk prepares a VA Form 90-2064 Authority to release and ship effects and funds, or successor form, complete with signature of the medical facility Director, or designee, and returns form to AOD who is responsible to determine next of kin.

(2) When it is determined that there is no next of kin, the PFOP clerk is notified. The PFOP Patient Funds Clerk requests a Journal Voucher number from the accounting department and funds are withdrawn from VPFS and completed VA Form 90-2064 is forwarded to accounting.

(3) Accounting prepares a OF 1017-G Journal Voucher and processes a transfer of funds from PFOP Fund 6020 to 8180G fund.

(4) The Journal Voucher and VA Form 90-2064 are kept on file in accounting.

#### 4. COLLECTIONS

a. Collected donations may not be deposited into a non-Government account. Department of the Treasury Section 4120-Guidance: US Treasury guidance, as outlined in Treasury Financial Manual (TFM) Part 5 Chapter 4100 <http://fms.treas.gov/tfm/vol1/v1p5c410.html> states that Federal agencies receiving public money from any source are statutorily required to deposit these funds into the U.S. Treasury, unless otherwise specifically authorized by law. Commercial accounts (e.g., banks or credit union accounts) may not be used to maintain GPF funds. See Treasury Financial Manual (TFM) Part 5 Chapter 4100, Requirements for Using Depositories to Hold Public Money.

b. All monetary donations must be deposited into the GPF within 2 business days of receipt or as soon thereafter as possible. The Agent Cashier is responsible for ensuring the deposit is made in accordance with Financial Policies and Procedures, Volume VIII, Chapter 3, Agent Cashier Accountability Policy, available at <https://www.va.gov/finance/policy/pubs/index.asp>.

c. Field service receipts for deposit to the GPF account must clearly indicate the name of the donor, nature of the gift, purpose of the donation, and any specific limitation, restriction, or identification required on items authorized for purchase from such funds, including identification as a specific or general donation. All collections credited to the GPF account must be scheduled on the SF-215, Deposit

Ticket, or subsequent issue (available through the Government Printing Office only) under the identifying symbol 36X8180.

d. The Budget Clearing Account (Suspense) should not contain GPF donations. Any GPF funds currently accounted for in a suspense account must be transferred to the GPF and credited to account 36X8180. GPF is not an auxiliary or “slush” fund to augment appropriated funding or accounts. The GPF is a federal trust account under 31 U.S.C. 1321(45) and must be used primarily for the benefit of patients and members (Veterans receiving care or treatment in or through VA facilities. 38 U.S.C. 8303 directs that GPF disbursements to be made within the Secretary’s discretion and should be aimed at the benefit of persons in hospitals or other facilities. While the agency has great latitude in how it administers and disburses GPF funds, Congress directed that GPF disbursements primarily help patients and members under 38 U.S.C. 8523.

e. The availability of GPF collections for disbursement purposes is determined in accordance with the type of donation:

(1) **Specific Donations.** A specific donation becomes immediately available for expenditure at the field facility for the enumerated purpose. If the donation is made by personal check, there is a 10-working day deferral period. The deferral period will be 2 days for Paper Check Conversion Over The Counter (PCC OTC). The deferral date will be annotated on the field service receipt.

(2) **General Donations.** General donations are deposited or transferred to the general purpose account 8180G (General Donation for Central Office-Restricted). All deposits and transfers to this account must be identified on collection documents, journal vouchers, and SF-224, Statement of Transactions. Facilities are not to disburse from 8180G fund under any circumstances.

## 5. EXPENDITURES

a. **General.** All GPF related expenditures incurred must comply with established VA financial policies and procedures. Gifts may only be used for a purpose that is authorized by law or directly beneficial to VA patients receiving care from VA except as otherwise authorized by statute. **GPF shall not be used as a “slush fund” or alternative to other appropriated fund accounts, e.g., IT, Medical Services, GenAd, or GOE accounts, etc.**

(1) GPF funds may be used to purchase items to be blessed or consecrated for use in serving the religious needs of Veteran patients of a particular faith group or denomination. These items remain under the custody of the chaplain of the particular faith group or denomination for the purposes of appropriate use, and at the end of their useful life, for appropriate disposal. GPF funds may be used to provide honoraria for clergy, or musicians who provide services on a non-recurring basis. Payment for such services must be made in accordance with VA contracting policies and procedures (See VHA Directive 1111, Spiritual and Pastoral Care Procedures, dated November 22, 2016).

(2) GPF funds and in-kind donations that have been earmarked for Homeless Veterans are permitted to be used as needed for this Veteran population for the purposes set forth below. Veteran Homelessness is considered a health issue. Any of the VHA officials authorized under this directive to accept gifts may authorize these expenditures:

(a) Transportation needed by Veterans under VA care or treatment to and from stand downs and as necessary to facilitate in their finding and moving into permanent housing. This includes travel by common carrier/public transportation (bus, train, subway/light rail/Metro, taxi, etc.).

(b) Personal comfort items needed by Veterans under VA care or treatment, which include: clothing (e.g., socks, underwear, pants, shirts, footwear, coats, gloves, hats, etc.); blankets; quilts/lap robes; sleeping bags; pre-paid cell phones; phone cards; or personal care items to facilitate and assist with meeting a Veteran's basic immediate needs.

(c) Household goods, cleaning supplies, apartment start-up kits, small household appliances, furniture, and cookware needed by Veterans under VA care or treatment (for example with their start-up needs when transitioning into permanent housing).

(d) Rental deposits, utility bills, laundry vouchers needed by Veterans under VA care or treatment. Funds must be disbursed directly to the vendor of laundry vouchers, utility, or landlord for the specific purpose identified. GPF is not to be used for any other debits such as rental payments, credit card bills, car loans, or personal loans.

(3) GPF accounts are not to be used for the acquisition, construction, renovation, expansion, alteration, or repair of VA medical facilities and space used to provide care and treatment except with the Secretary of Veterans Affairs' approval as noted in appendix B, paragraph 2.g.

(4) GPF expenditures incurred for the sole benefit of individual patients, such as training of caregivers, travel and lodging expense of visiting families, telephone calls, or similar purposes are authorized.

(5) GPF expenditures of specific donations for food, refreshments, and entertainment incurred for dedication ceremonies, rededication ceremonies, groundbreaking, and building anniversaries are authorized (unrestricted donated funds may be used only if approved by the Secretary of Veterans Affairs, or appropriate delegates; OGC may be consulted to assist in the approval analysis process as desirable.

(6) GPF funds may not be accepted or used to purchase items for resale.

(7) GPF funds may not be accepted or given to a Veterans Service Organization (VSO) or other non-VA entity unless these funds are used to pay for services provided

under a contract with the entity. **NOTE:** *Expenditures under the contract must be for a purpose authorized under this directive.*

(8) GPF funds and in-kind donations that have been earmarked to support Fisher Houses may not be used for any other purposes. Such purposes may include: Items and services to support ongoing Fisher House operations (e.g., cleaning supplies, appliances, furniture, refurbishment projects, and contractual services including HVAC maintenance, housekeeping, cable and internet, Hotel contacts for Fisher House over flow accommodations, and landscaping services).

b. **Expenditures Using Restricted Donations.** The VHA officials who are authorized to receive gifts as described in appendix B, paragraph 2.a. may delegate the authority to incur expenditures using restricted donations. This authority must be documented by a delegation of authority and must assign the appropriate control point officials and clerks. The delegation of authority must be signed by one of the VHA officials authorizing the delegation listed in appendix B, paragraph 2.a.

(1) Money designated for VA Voluntary Service (VAVS) Committee purposes may be used to pay for recognition ceremonies attended by VA volunteers.

(2) Separate accounts for major faith groups may be established to receive and expend funds from chapel offerings. **Expenditures Using Unrestricted Donations (includes donations specific to one or more facilities that otherwise have no restrictions placed on them by the donor).** The VHA officials who are authorized to receive gifts as described in appendix B, paragraph 2.a. may delegate the authority to incur expenditures using unrestricted donations. This authority must be documented by a delegation of authority and must assign the appropriate control point officials and clerks. The delegation of authority must be signed by the VHA official authorizing the delegation (those officials authorized to accept donations). The appointed Control Point (CP) official(s) will ensure that the expenditure is for the benefit of patients or members who are being supplied care or treatment by VA in any medical facility.

(1) Unrestricted money may not be used for expenditures incurred in the care and treatment of a patient in a VA medical facility, or to purchase, maintain, or repair equipment used to provide care and treatment, nor are they to be used for recurring operations.

(2) Unrestricted money may not be used to reimburse the salary or contract costs of medical care providers.

(3) Only the Secretary of Veterans Affairs or the Under Secretary for Health may approve the use of unrestricted funds to purchase food and/or refreshments at activities that do not involve the direct participation of inpatients and/or members; the USH may delegate his/her authority as may be desired. Reference: VA Financial Policy Vol. II, CH. 4, Awards, Ceremonies, Food, or Refreshments, Gifts or Mementos (<https://www.va.gov/finance/docs/VA-FinancialPolicyVolumellChapter04.pdf>). The following do not need such approval:

(a) Receptions at VA National Sports Programs and Special Events. However, GPF is not the sole funding source for these programs;

(b) Multi-patient memorial services honoring deceased Veterans, attended by caregivers and families;

(c) Stand Downs and Welcome Home Events for Veterans.

(4) The following are some examples of prohibited GPF expenditures using unrestricted funds:

(a) Unrestricted GPF funds may not be used to fund an individual's membership in a professional association, but such GPF funds can be used to pay for the agency's membership in an association.

(b) Employee activities except for recognition ceremonies for VA Voluntary Service (VAVS) volunteers. **Approval of Expenditures.** All withdrawals from the GPF must be approved by the designated CP official and be in accordance with the purpose of the donation. All obligations must be recorded in the subsidiary ledger (Integrated Funds Control, Accounting, and Procurement (IFCAP) fund control point). CP officials should review Control Point balances on a daily/routine basis to ensure funding is available. All purchases made from the GPF are subject to audit and can be reviewed to ensure the intent of the donation is met.

**e. Obligation and Posting Procedures.**

(1) All purchase card orders will be processed in accordance with VA Financial Policies and Procedures, Volume XVI, Chapter 1, Government Purchase Card Program. All purchase orders should be input within 1 business day. The IFCAP fund control point for GPF's should always be set to "overcommit not allowed" to ensure funding is available. CP officials are responsible for ensuring adequate funding is available prior to authorizing any expenditure. All obligations or change in obligation will be requested by the CP clerk and approved by the CP official prior to purchase. VA Form 1358 Obligation or Change in Obligation using GPF must be used for Veteran meal tickets or payments to Veterans only. Purchase Card orders may not be "sub-divided" into smaller amounts to avoid Purchase Card authority limits.

(2) Cash payments can be authorized by the CP official. The request for cash must contain a valid obligation number (1358) which references Financial Policies and Procedures, Volume II, Chapter 6, Appendix A: VA Form 1358 Approved Uses # 20, Non-Procurement Obligations. The request for cash must be signed by the CP official and will be attached to the Agent Cashier Replenishment.

**(3) Advances to Social Workers from the General Post Fund.**

(a) When specific donations are received for making payments to, or for Veterans for travel of visiting families, telephone calls, and cash advance may be made to a designated social worker on behalf of the Veteran. The VA medical facility Director

must designate the social worker in writing, by name and title, to receive and disburse such funds.

1. Use of purchase cards is preferred, but not required. If this is not a practicable option, cash advances may be made based on the availability of cash funds, up to a maximum of \$200, to the social worker.

2. These funds may not be deposited into personal bank accounts or commingled with personal funds, and must be properly safeguarded against theft.

3. Only the employee receiving the advance can disburse the funds.

**NOTE:** *Unannounced verification of outstanding advances will be made in connection with the audit of the agent cashier funds per Financial Policies & Procedures, Volume VIII, Chapter 3 Agent Cashier Accountability Policy, available at <https://www.va.gov/finance/docs/VA-FinancialPolicyVolumeVIIIChapter03.pdf>.*

(b) A memorandum requesting the cash advance is prepared and must cite the authority for the advance, the purpose, and the specific account from which the advance is to be made. The memorandum must be approved by the VA medical facility Director, or designee, and forwarded to the fiscal activity for obligation. A copy must be retained for obligation control purposes and the original forwarded to the agent cashier authorizing the cash advance.

1. The social worker must follow agent cashier policy and procedures and acknowledge receipt of the advance with the social worker's signature.

2. An accounting of each cash advance is made as additional funds are required and at least once per quarter.

3. Receipts and remaining cash must be returned to the agent cashier in exchange for the receipted memorandum. The agent cashier notes the obligation copy of the memorandum to show that the remaining cash was returned, and that the replenishment voucher is posted as a withdrawal and the obligation liquidated.

g. **Gift Cards/Canteen Coupon Book Purchases.** Gift cards and canteen coupon books may be purchased from GPF for distribution to inpatients, members, and/or caregivers of the Veteran (for Veteran use) only, if the distribution of the cards or books will support the mission and goals of VHA and will directly benefit the Veteran.

(1) The purchase card holder making the purchase of a gift card or Canteen coupon book will maintain an electronic tracking (spreadsheet) to include date of purchase, purchase order number, date of distribution, card serial number, value of card or coupon, and purpose/activity. This electronic tracking mechanism (spreadsheet) will be maintained for accountability and auditing purposes. Unannounced audits should be completed at least quarterly.

(2) Gift cards and Canteen coupon books must be maintained in a secure manner, either in a safe or a locked area. The CP official who authorized the purchase is personally responsible for ensuring the material is stored in a secure environment.

## **6. ACCOUNTING FOR DONATED ARTICLES AND ITEMS PURCHASED WITH GENERAL POST FUNDS**

a. **Trust Fund Property.** A trust is a relationship whereby property is held by one party for the benefit of another, created by a grantor or settlor, who transfers property to a trustee to hold or to use the money for the benefit of a third party.

(1) GPF is a federal trust account established to hold donated funds/proceeds to carry out Donors' intent to benefit the agency/patients/members.

(2) Before the beneficiary receives the property/proceeds, the property is first transferred to a third party, called the "trustee." The trustee is responsible for collecting and protecting the trust fund property. Trust fund property is property received as a gift or bequest from individuals or non-government organizations and personal property purchased from General Post Funds, but may also include the following:

(a) Equipment donated by manufacturers for promotional, experimental purposes.

(b) Personal property left on VA property by a deceased patient or member of a VA facility who dies intestate and who does not leave any survivors, next of kin, or heir entitled under the law of the decedent's domicile to that personal property. See 38 U.S.C. 8501.

(c) Unclaimed property, exclusive of government-owned property, found on premises under the control of the VA.

(d) Trust fund property transferred between stations.

(e) Building service equipment and nonexpendable property held pending disposal which was previously acquired (purchased or donated) as trust fund property.

b. **Types of Donated Articles.** All items described below should be recorded in the Voluntary Service System (VSS) as a donation.

(1) **GPF Trust Expendable Supplies.** Expendable items placed in stock that were donated or purchased from GPFs must be recorded in the trust supplies inventory control account. OAL perpetual inventory records are the subsidiary to this account.

(2) **GPF Trust Equipment, Non-Expendable or durable equipment.** Non-expendable equipment is an item which retains its identity throughout its useful life and whose dollar value is high enough to warrant accountability. VA will capitalize all equipment when the acquisition cost or fair market value (donated value) is \$1,000,000 (per unit) or more and the useful life is greater than 2 years. All non-expendable equipment items are recorded in the Equipment Inventory Listing (EIL) and recorded in

the Fixed Asset Subsystem (FAP). This recording includes both capitalized and non-capitalized non-expendable items.

(3) **Property Pending Disposal (Trust).** The value of materials, supplies, and equipment purchased with GPFs and/or donated, which are on hand pending sale, transfer, salvage, destruction, etc. must be recorded in the property pending disposal (trust) inventory control account. Balances in this account control the subsidiary records maintained by OAL. Proceeds from the sale of such property must be deposited as general donations to the GPF unless the donor originally specified otherwise.

(4) **GPF Supplies (Expendable).** Expendable items purchased from GPF's and upon receipt issued immediately to patients, members, or others must be recorded as a credit to the accounts payable account and a debit to an expense account. Expendable items that are donated and issued immediately to patients, members, or others must be recorded as an operating expense.

(5) **GPF Building Service Equipment and Real Property.**

(a) For donated real property, the asset will be recorded in the GPF and immediately be transferred to the Assets and Miscellaneous Accounts Fund (AMAF) series of accounts. All costs associated with bringing the donated asset to a form suitable for its intended use will be capitalized. Similarly, building service equipment is not to be recorded in the GPF, but must be recorded in the AMAF series of accounts.

(b) Buildings and building service equipment purchased with GPF's must be recorded in the work-in-process holding account used to track costs/value. When the project is complete, VHA Office of Finance will make the appropriate accounting entries to move the cost into the appropriate AMAF general ledger accounts. Only buildings/service equipment will be capitalized if all capitalization requirements are met. All equipment and real property will be accounted for in accordance with Financial Policies and Procedures, Volume. V, Chapter 9 General Property, Plant, and Equipment, available at <https://www.va.gov/finance/policy/pubs/index.asp>.

(c) Land. VA will capitalize (and not depreciate) land, regardless of cost, in the Department's Financial Management System (FMS). All equipment and real property will be accounted for in accordance with Financial Policies and Procedures, Volume. V, Chapter 9 General Property, Plant, and Equipment, available at <https://www.va.gov/finance/policy/pubs/index.asp>. Donations of land should not be accepted unless the agency can use the land; e.g., land too encumbered or unsuited for a given purpose.

(6) **GPF Non-Government Securities.** Non-government securities donated to the GPF must be recorded at the market or appraised value at the time of acquisition.

## 7. RESIDUAL FUNDS

a. Residual balances are the result of funds remaining in an account that were donated for a specific purpose that have been expended to the extent that further execution of the purpose specified is impractical. When the residual balance is less than \$100, the funds must be transferred to the general purpose account (8180G) using an Official Form (OF) 1017-G, Journal Voucher, or subsequent issue, to record the entries. Where the residual balance is \$100 or more, reasonable effort must be made to contact the donor and obtain approval to transfer the residual balance. In the event that a donor cannot be contacted, the funds must be transferred to the general purpose account (8180G) as instructed above.

b. Residual funds allocated by VA Central Office in 8180A for a National Program event, or other specific purpose, normally are to be returned to VHA Central Office. To accomplish this, the fiscal activity must transfer the residual funds from the designated ACC to the budgetary level that allows VHA Central Office to withdraw the funds (the "undistributed" line in the Financial Management System (FMS)).

(1) Facilities must notify VHA Office of Resource Management (10A3B) by email of amounts available for withdrawal. Contact the Office of Resource Management (10A3B) for current email address in use.

(2) Facilities may request by email, or written memorandum, that the Office of Resource Management (10A3B) grant permission to transfer the funds directly to another field facility for use in funding the same event in the future.

## **8. INACTIVE BALANCES**

An account with an inactive balance is an account that holds funds void of any transactions or activity for a period of 2 years. Accounts with an inactive balance in excess of 2 years must be administratively evaluated at a local level to determine the need for and/or the feasibility of expending funds for the purpose specified by the donor. If a determination is made that the funds will be used in the next 24 months, the fund may be considered active. If a determination is made that the funds are no longer needed for execution of the specified purpose, a reasonable effort must be made to contact the donor(s) and obtain approval to transfer the residual balance. If the donor is not agreeable to the transfer, the funds must be returned to the donor with an appropriate letter of explanation. In the event that a donor cannot be contacted, the funds must be transferred to the general purpose GPF account (8180G) using an Official Form (OF) 1017-G, Journal Voucher, to record the entries. VHA Office of Resource Management (10A3B) must be notified by email of any such amounts transferred to 8180G fund. GPF accounts with an inactive balance of less than \$25 may be closed and the balance transferred to the general purpose GPF.

## **9. INVESTING THE GENERAL POST FUND TRUST FUND BALANCE**

a. The GPF is a Federal trust fund authorized by 31 U.S.C. 1321(45). Department of the Treasury policy requires Federal trust funds to invest in non-marketable, "special" securities that are created and made available exclusively to the Federal Trust and

other funds. All of these investment options pay interest semi-annually and have maturity dates ranging from 1 month to 30 years.

b. The VA Office of Financial Policy, Management, and Financial Reports Service, must notify the VHA Chief Finance Officer (CFO) monthly of the cash balance in the 8180 account. The cash balance is analyzed for potential investment in light of future funding requirements, approaching maturities of current investments and other factors impacting the cash balance. **NOTE:** *The VHA CFO may delegate this authority to a VHA Associate CFO as the CFO may authorize appropriate staff to allocate the GPF investments.* The VHA Office of Finance directs the Department of the Treasury to allocate the GPF investments according to the instructions from the VHA CFO.

c. The entire cash balance must not be invested. A sufficient cash reserve must remain available to meet the current operating needs of the GPF (i.e., to liquidate obligations as required). Historically, \$1.5 to \$2 million of the cash balance is not invested, when a security matures and surplus cash must be reinvested. This range for the cash reserve has always proven sufficient; however, the VHA CFO must adjust this amount if future fund activity necessitates a larger cash balance.

d. The investment strategy seeks to optimize interest income to fund operations and events supported by the GPF while guarding against the dual risks of future interest rate changes and future cash requirements. Income is maximized by investing in longer-term maturities that pay higher-interest rates. A balance must be maintained between longer-term and shorter-term investments, such that at least one-half or more of all the investments must mature within every 6-month period.

e. In general, and especially when the availability of GPF monies may be insufficient to fund typical outlays within the ensuing 2 years, investments that require a significant premium are to be avoided because the premium cannot be recouped until the investment matures. Care needs to be taken to avoid large interest pre-payments, if there is deemed to be any possibility of a cash shortage before the next semi-annual interest payment is made on that investment by the Department of the Treasury (interest pre-payments are recouped with the first semi-annual interest payment).

f. The preceding thresholds for cash reserves, interest payments due within every 6 month period, and securities maturing within every 6-month period have been set based on historical operations of the GPF. These threshold amounts may need to be reviewed and adjusted, if future fund operations vary significantly from historical operations. **NOTE:** *More information about investing trust fund monies can be found in the Department of the Treasury Operating Circular – Responsibilities Relating to Government Investment Accounts and Investing in Government Account Series Treasury Securities at: [http://www.treasurydirect.gov/govt/apps/fip/fip\\_fedinvest.htm](http://www.treasurydirect.gov/govt/apps/fip/fip_fedinvest.htm).*

## GIFTS AND DONATIONS

**NOTE:** For purposes of this directive, the term “gift” includes donated money, donated personal property, real property, in-kind donations, devises, and bequests. VA, as other federal agencies, may only accept gifts and donations that augment their appropriations if they have the specific statutory authority to do so.

### 1. Accepting Gifts and Donations.

a. In accordance with 38 U.S.C. 8301, the Secretary of Veterans Affairs may accept gifts, bequests, and devises that support Veterans who are patients or members of any VHA facility or are for the benefit of VA facilities. The Secretary also may accept gifts for use in carrying out the laws under VA administration that would enhance the Secretary's ability to provide services and benefits.

b. If it is determined that a gift, donation, or general post funds can be accepted but there is an ethical concern about whether it should be accepted, medical center leaders and staff may make an ethics consultation request to the OGC Ethics Specialty Team. at [OGC023Ethics@va.gov](mailto:OGC023Ethics@va.gov)

c. The Under Secretary for Health (USH), or designee, is authorized to accept gifts for the benefit of patients and members of VA medical facilities, and for the benefit of one or more VA medical facilities. The Under Secretary for Health, or designee (including the GPFRC), must authorize all transfers or allocations to VHA field facilities. Note: the USH may only accept donations for the acquisition, construction, improvement, or expansion of medical facilities and acquiring sites for such facilities but only for gifts valued at \$100,000 or less. The Directors of the Office of Acquisitions, Logistics, and Construction (OALC) and the Director of Construction and Facilities Management (CFM) may accept donations under 38 U.S.C. 8103, 8104 for these purposes without a dollar amount limitation (but for major construction).

d. Other VHA officials authorized to accept gifts include the following:

(1) The Director, Voluntary Service Office at VA Central Office, or designee, is authorized to accept gifts for the benefit of patients and members of VA medical facilities, and for the benefit of one or more VA medical facilities.

(2) Veterans Integrated Service Network (VISN) and facility Directors are authorized to accept gifts for the benefit of patients at their VISN or facility and for the general benefit of the network or medical facility.

(3) The Chief Learning Officer is authorized to accept, for use in carrying out all laws, regulations, and VHA policies administered by the Employee Education System (EES), gifts which enhance its ability to provide services for VHA. This authority may not be delegated.

(4) The Chief, Chaplain Service at each facility is authorized to accept gifts for the benefit of the religious needs of patients and to support all Chaplain Service activities at

the facility (see VHA Directive 1111, Spiritual and Pastoral Care). At VA facilities that do not have a Chief, Chaplain Service, the facility Director may delegate this authority to the lead or coordinating chaplain. The Voluntary Service Officer/Program Manager at each VA facility is authorized to accept gifts that benefit the facility and/or its inpatients or members. This authority may not be delegated. The Voluntary Service Officer/Program Manager is not authorized to accept gifts for research and education purposes.

(5) The Chief Consultant, Public Health Strategic Health Care Group (10P3) is authorized to accept gifts designated by the donor for carrying out VHA policies administered by this Group.

(6) For guidance on the proper handling of donations for research purposes, see VHA Directive 1200.2, Research Business Operations, dated March 10, 2017. For guidance on the proper handling of donations for research education purposes, see VHA Handbook 1200.17, Department of Veterans Affairs (VA) Nonprofit Research and Education Corporations Authorized by Title 38 U.S.C. 7361- 7366, or subsequent policy issue.

(7) VA employees at VHA medical facilities who do not have authority under this directive to accept gifts and donations must refer all offers of gifts and donations (except those for research or education purposes) to the Voluntary Service Officer/Program Manager to determine acceptability of the gift and for proper record documentation and acknowledgement to the donor. OGC may be consulted as may be necessary.

e. In any case where questions arise as to whether or not a gift may be legally acceptable, consult the Office of General Counsel.

f. VHA officials are not to accept gifts in return for VA endorsements of or testimonials for any product or commercial line of endeavor (see 5 CFR 2635.702(c)).

g. If a donor does not intend to relinquish all control over the future use of the donated property, the donor's intent must be set forth in a gift agreement to which the VA accepting official(s) agrees. For example, with a gift agreement, a VA accepting official may accept temporary use of personal property for a set period without charge to VA.

h. Devises or bequests, if administratively acceptable, must be referred to the appropriate District Chief Counsel in OGC to determine legal acceptability. Certain legal principles may be involved in making replies to individuals who indicate a desire to include a devise or bequest to VA in their wills. No commitments are to be made until a legal opinion has been obtained from OGC.

## **2. Acceptance and Non-acceptance.**

a. VHA officials, facility Directors, or their designees, must express their appreciation in writing for any accepted gift within 30 business days of receipt. There is no official form. A polite letter specifically referring to the gift or donation is acceptable.

b. Any gift not accepted must be gratefully acknowledged and the acknowledgement should indicate the reason(s) for non-acceptance if deemed appropriate.

c. In the case of gifts made for a specific purpose, that purpose must be documented and maintained for accounting and auditing purposes. This may be done by a notation on the deposit memo to the agent cashier, an acknowledgment letter, or, through a Memorandum of Agreement (MOA). The specific purpose should also be specified in the acknowledgement letter to the donor. . If possible, an approval should be requested from the donor to transfer any residual balance if funds donated for a specific purpose are expended to the extent that further execution of the purpose specified is impractical.

d. A donor's instructions concerning the use of a special purpose gift must be carried out to the extent they are proper, practicable, and not in violation of law or VA policies. If a gift cannot be accepted because the facility cannot fulfill the purpose specified by the donor, the facility may ask the donor to permit the funds to be used for another purpose. Otherwise, the gift must be returned to the donor. **NOTE:** *A gift need not be accepted simply because it is offered. If the agency cannot use or accept it, it can be politely rejected with appreciation for a Donor's generosity).*

e. Donations to the GPF are tax deductible. The Internal Revenue Service (IRS) has specific guidance for tax deductibility of donations or volunteer time to charitable organizations (IRS Publication 526: Charitable Contributions). VA will not provide volunteers with letters verifying expenses incurred during volunteer service, including car, transportation, or other out-of-pocket expenses.

f. Monetary and in kind donations will be acknowledged with a letter of acceptance containing the following:

(1) The amount of cash and/or description (but not value) of any other property contributed and

(2) A statement that no goods or services were provided by VA in return for the contribution. This statement is necessary because VA does not have the authority to provide donors with goods or services in exchange for contributions. If it is believed that VA provided the donor with goods or services in exchange for the contribution, OGC, must be contacted for further instructions prior to signing a letter of acceptance. A *quid pro quo*, consideration, or a condition precedent to a "gift" may indicate some other transaction other than a gift is at issue.

(3) VA accepting officials may decide to reject gift offers for reasons such as there is no anticipated need, the cost of maintaining the item is out of proportion to its value, or that the agency cannot legally use the gift according to a Donor's wishes.

(4) Gifts of money will not to be accepted if the donor stipulates that the purpose would be for making loans to, or on behalf of, patients or incurring any "conditional" expenditure. Cash gifts cannot be accepted for functions, efforts, or missions the agency cannot perform legally.

### **3. Disposition of Donations.**

Monetary donations must be provided to the Agent Cashier and deposited to the GPF account as soon as practicable but no later than 2 business days after receipt. The Agent Cashier is responsible for ensuring the deposit is made in accordance with Financial Policies & Procedures, Vol. VIII, Ch. 3 Agent Cashier Accountability Policy, available at <https://www.va.gov/finance/docs/VA-FinancialPolicyVolumeVIIIChapter03.pdf>. Outside accounts (e.g., banks or credit union accounts) may not be used to maintain GPF funds. See Treasury Financial Manual Part 5 Chapter 4100, section 4120, [Requirements for Using Depositories to Hold Public Money](#). See also the Miscellaneous Receipts Statute, 31 U.S.C. 3302(b), that requires agencies receiving funds to which they have no authority to hold to forward the funds to Treasury.

a. An employee accepting a cash donation must prepare, in duplicate, a VA Form 10-2815, Temporary Receipt for Funds, or subsequent issue. The original must be given to the donor and a copy delivered with the cash donation to the agent cashier. If the Agent Cashier is unavailable, a copy of the original form and the donation must be locked in a safe until the funds can be turned over to the Agent Cashier. **NOTE:** *For the proper disposition of mailed donations, reference Financial Policies & Procedures, Vol. VIII, Chapter 3 Agent Cashier Accountability Policy, available at <https://www.va.gov/finance/docs/VA-FinancialPolicyVolumeVIIIChapter03.pdf>. VA Form 10-2815 is automatically generated in the Voluntary Service System (VSS) Donations package.*

b. Donation checks for Veterans Canteen Service (VCS) coupon books erroneously made payable to the VCS must be endorsed: "Payable to VA by the VCS for deposit to the GPF."

c. Property donated by the American Red Cross which becomes surplus to the needs of VA may be subsequently disposed as prescribed in the Federal Property Management Regulations, 41 CFR 102-36.445. Donated property from other organizations or individuals which becomes surplus to the needs of VA may be disposed of as otherwise prescribed in the Federal Property Management Regulations.

### **4. Inscription on Gifts.**

Donors may be recognized with a suitable inscription on the gift. However, in no case will the inscription, whether by specific language or by implication, give the impression that the gift is owned by the donor, or that the donor controls further use of the gift. VA cannot appear to endorse a donor but may acknowledge a donor and the donor's generosity.

a. The size and design of any tablet, plaque, etc., containing an inscription or acknowledgment must coincide with the general nature and design of the gift.

b. The donee VA facility is authorized to pay for and furnish the identifying plaque under the "necessary expense" rule.

#### **5. Medical Equipment.**

Acceptance of medical equipment donations is limited to comparable equipment normally supplied for standard use in VA facilities. The Under Secretary for Health and VISN Directors are the only VHA officials authorized to accept the donation of medical equipment. All donated equipment is subject to an incoming inspection pursuant to the requirements of The Joint Commission before the equipment is made available for patient care deployment.

#### **6. Supplies and Equipment.**

Gifts of supplies and equipment (other than medical equipment) normally obtained through routine VA acquisition processes may be accepted to the extent the donations fall within the established stock levels for the facility. Larger quantities may be accepted only if another VA facility or facilities agree to use the donated items, the items are within their established stock level, and the other facility or facilities agree to pay any associated shipping charges.

#### **7. Real Estate or Construction.**

a. Gifts or donations for the purpose of acquiring, constructing, or altering VA medical facilities, including leased facilities, cannot be accepted under the GPF authority. They can be accepted under 38 U.S.C. 8103(a)(2) or 8104(e). The Secretary of Veterans Affairs has delegated this authority to the Under Secretary for Health to accept gifts or donations for this purpose, for donations of no more than \$100,000. The Secretary has delegated this authority without dollar limit to the Director, Office of Acquisition, Logistics, and Construction and to the Director, Construction and Facilities Management. Donations at or greater than \$10M for the alteration of, addition to, or construction of any medical facility will fall under the major construction "floor" of \$10M under 8104(e) and require Congressional approval. Note: a combination of projects to fulfill a single overall requirement may not be sub-divided or "unbundled" to avoid 8104(e)'s major construction limits. Any major medical facility construction project or donation for major construction for a medical facility must receive Congressional approval. A gift or donation may not be used to circumvent the stated major construction threshold for Congressional approval.

b. If there is any doubt as to whether or not a donation or potential project is subject to this \$10M major construction restriction, request OGC guidance. Offers of gifts that would constitute major construction, alteration, or addition to medical facilities must be forwarded to the VHA Central Office GPF Review Committee. The GPFRC submits the request with recommendations to the Under Secretary for Health for possible submission to the Secretary of Veterans Affairs, after receiving General Counsel concurrence. Facility requests for approval of construction work exceeding \$25,000 must be accompanied by the application from the VISN Service Support Center (VSSC) database for minor and Non-recurring Maintenance (NRM) projects. The request must include the amount of the offered donation, as well as the facility's estimate of the actual cost of construction. Prospective donors expressing an interest in donating gifts to a new facility under construction need to be encouraged to wait until the facility is operational. The Secretary of Veterans Affairs must approve all proposals over \$100,000 to use money already deposited in the GPF for acquiring, constructing, or altering VA medical facilities, including beautification and/or enhancement projects, gardens, etc. The USH has been delegated the authority to use money already deposited in the GPF for this purpose for proposals addressed by VA Directive 7531 and other proposals under \$100,000.

**8. Recording Donated Items.**

a. Within 5 working days of accepting a non-monetary gift, the Office of Finance needs to obtain the assistance of the Office of Acquisition and Logistics (OAL), or other services as appropriate, to determine the gift's proper valuation. The valuation must be included in the GPF records. OAL is to be furnished with:

- (1) A copy of the letter of acceptance,
- (2) A listing of the gifts, and
- (3) An explanation of any restrictions placed on the gift by the donor.

b. This information must be used to record the gifts in the facility's accountability records and to prepare the necessary issuance document.

c. Expendable items donated directly to the using service (if authorized to accept the donation) are not normally recorded in the accountability records.

(1) Expendable property, by definition, is that property valued at less than \$300 and with a useful life of less than 2 years.

(2) Consult OAL with questions about expendable versus non-expendable items.

(3) Ensure the donated items are included in the proper equipment inventory list (EIL). Recording of gifts accepted by Voluntary Service will be recorded in the VSS donations package. Other Services who are authorized to accept gifts will be encouraged to report the total donations accepted by them, to the Voluntary Service Office for tracking purposes. In some cases these donation reports may come from

their National Program Office. These reports are accumulated for the Under Secretary for Health and the Secretary of Veterans Affairs to give senior management the trends in VA donations by “Facility”, “VISN”, and “National totals.” (VHA Handbook 1620.01, Voluntary Service Procedures).

### **9. Soliciting Contributions.**

a. Solicitation of Contributions. VA’s express statutory authority to accept gifts under 38 U.S.C. 8301 includes the implied authority to solicit gifts, see *Authority to Solicit Gifts; Memorandum Opinion for the Director, Office of Government Ethics*, Attorney General, Office of Legal Counsel, January 19, 2001, and also *VAOPGCPREC 2-2015, Authority to Solicit Gifts under 38 U.S.C. 8301*, March 20, 2015.

b. VHA officials who have delegated authority to accept gifts may:

(1) Take action to raise the public's awareness of VHA's willingness to accept gifts and the productive use of GPF gifts; and may delegate their authority to raise the public’s awareness to other VHA management employees.

(2) Communicate VHA gift needs to potential donors.

c. Caveat: to avoid ethical conflicts, solicitations may not include participation in or support of a third party’s fund-raising initiatives or include lobbying, grass-roots or otherwise. The Ethics Specialty Team in OGC should be consulted regarding these issues.

### **10. Appropriate VA Employee Travel.**

Travel for VA employees may be paid for in whole or in part in certain circumstances by GPF funds as noted below. Government ethics rules may apply to acceptance of gifts for travel. VA may accept travel funding from non-Federal sources in accordance with 31 U.S.C. 1353, as implemented by the Federal Travel Regulations in 41 C.F.R. Chapter 304. VA employees may accept training and related expenses under 5 U.S.C. 4111 if the donor is a 501(c)(3) entity. The Ethics Specialty Team (EST) in OGC would consult and advise regarding gifts of travel to individual employees.

### **11. Official Travel to Attend a Meeting or Similar Function.**

See the Non-Federal Source Funding (donated travel) policy Vol. XIV, Chapter 9) for Department policy on VA or VA employees accepting gifts for official travel to attend a meeting or similar function. **NOTE:** “Meeting or similar function” is defined in 41 CFR 304-1.2(c)(3).

### **12. Official Travel to Other Than a Meeting or Similar Function.**

For support of official travel other than to a meeting or similar function, authorized VHA officials may accept gifts to VA for official travel to conduct government business,

but only for attendance at, or participation in, an event relating to the employee's official duties and only if the gifts are:

(a) In compliance with the designated purpose of the donor (if the donation is designated for a research or education project only that portion identified by the donor as appropriate for travel by VA staff may be used for travel).

(b) For conducting Veterans' National VA Rehabilitation Special events, or otherwise for the direct benefit of VA patients or members (e.g., travel accompanying a patient).

### **13. Liquidation of Donated Property not Needed for VA Purposes.**

In accordance with 38 CFR 12.22, any assets consisting of personal property accruing to the GPF, including stocks, bonds, and similar instruments, must be sold or otherwise converted to cash. Any such property received as general or specific donations must be similarly be converted to cash.

**NOTE:** *Although this provision addresses assets accruing to the GPF in cases when Veterans die in VA facilities without heirs or next of kin, these procedures also apply when property is donated to VA. Any donated real property accepted by a VHA official, but not needed for VA purposes, must be sold, but only the Secretary of Veterans Affairs may sign the deed, unless the Secretary of Veterans Affairs has delegated that authority.*

### **14. Education.**

Gifts or donations for support of education activities in a facility may be accepted under conditions outlined in VHA Directive 1400.09, Education and Physicians and Dentists, dated September 9, 2016 and VHA Handbook 1400.03, Veterans Health Administration Educational Relationships, dated February 16, 2016.

## ALLOCATIONS

### 1. TRANSITIONAL HOUSING PROGRAM

a. Section 202 of Public Law 105-114, as amended, codified in part at 38 U.S.C. 2032, authorizes the allocation of General Post Fund (GPF) monies (in addition to program fees discussed below) for use in the acquisition of real property for the purpose of carrying out the Compensated Work Therapy/Transitional Residence (CWT/TR) Program. . GPF contributions to transitional housing programs fall under 38 U.S.C. 2032(e)(2)(B) when the Secretary purchases interests in a residential property suitable for transitional housing: GPF funds may be transferred to the Loan Guaranty Revolving Fund in an amount not to exceed the price the Secretary paid for the property. **NOTE:** *Allocation of GPF monies to the CWT/TR is not mandatory and is therefore subject to the approval of the GPF Review Committee.* The Secretary of Veterans Affairs may dispose of any property acquired for the CWT/TR program. The proceeds of any such disposal shall be credited to the GPF.

b. The operation of the CWT/TR program and funds received from patients shall be separately accounted for and shall be stated in the documents accompanying the President's budget for each fiscal year.

(1) CWT/TR program fee ("rent") collections paid directly by Veterans to the Agent Cashier, will be deposited into a designated CWT/TR sub-account of the General Post Fund – 36X8180S. These payments contribute to covering the expenses of operations and management of these residential facilities as described in cost centers 8850-8859.

(2) In order to meet statutory requirements for separate budgetary reporting by the Secretary of Veterans Affairs, the fiscal officer or Director at each VA medical facility operating a CWT/TR Program must ensure a complete and accurate accounting for all GPF receipts and expenses associated with the operation of the CWT/TR programs. This is accomplished by ensuring accurate posting to the appropriate standard general ledger (SGL) accounts and cost centers within the Financial Management System (FMS).

c. Specific accounts will be used for CWT/TR financial reporting as follows:

(1) **Payroll Deductions.** CWT/TR program fees ("rent") automatically deducted from CWT payroll must be processed in FMS using transaction code TR 76, and revenue source code 9057 which will credit SGL account 5904 – Rental Income – Transitional Housing.

(2) **Office Payments.** CWT/TR program fees ("rent") paid by Veterans at the Cashier's Office must be processed in FMS using transaction code CR 61, which will credit SGL account 5904 – Rental Income – Transitional Housing.

(3) **Operational Obligations.** All GPF expenditures for CWT/TR utilities, maintenance, household items, etc., must be charged to Cost Centers 8850-8859.

(a) 8850 - Housing Related Expenses.

- (b) 8851 - Housing Utilities.
- (c) 8852 - Housing Maintenance.
- (d) 8853 - Housing Subsistence (food).
- (e) 8854 - Housing Furnishings.
- (f) 8855 - Housing Appliances.
- (g) 8856 - Housing Service Equipment.
- (h) 8857 - Housing Cost of Sales.
- (i) 8858 - Housing Purchases.
- (j) 8859 - All Other.

(4) **Budget Object Class.** When making a purchase for the CWT/TR program from the CWT/TR GPF account, medical facilities must utilize the correct cost center outlined above and then enter the correct budget object class (BOC) related to the purchase. Outlined below are the most common BOC's utilized with the CWT/TR program, but this is not a complete list.

- (a) 2303 – Telephone.
  - (b) 2391 – Electricity.
  - (c) 2392 – Water.
  - (d) 2394 – Gas.
  - (e) 2395 – Sewer.
  - (f) 2543 - Maintenance and Repair Service.
  - (g) 2580 - Contracts and Agreements with Institutions and Organizations.
  - (h) 2650 – Fuel.
  - (i) 2660 - Operating Supplies and Materials.
  - (j) 2670 - Maintenance Supplies and Materials.
- d. Financial Management Elements.

(1) 38 C.F.R. 17.48 authorizes VA to charge Veterans a “program fee” to cover the cost of room and board, utilities, and housing maintenance. Money for program fees is derived from a Veteran’s earnings obtained by working in VA’s CWT Program or community employment positions. Program fees are charged primarily to foster

increased responsibility of Veterans for their recovery, and only secondarily to defray the cost of maintaining the houses. Each resident, other than the House Manager(s), is required to pay a "TR program fee" to cover costs associated with operational expenses, during the resident's period of occupancy. These funds must be deposited in a sub-account of the local GPF and used only to support the expenses associated with the management and operations of the TR residences. If revenues (program fees) of a residence do not meet the expenses, resulting in an inability to pay actual operating expenses, the medical facility of jurisdiction must provide the funds necessary to return the program to fiscal solvency.

(2) Each CWT-TR Program is required to justify the amount of the program fee charged to Veterans. On an annual basis, the CWT-TR Program Manager develops a projected operating budget. On a semi-annual basis, the CWT-TR Program Manager is required to compare the actual program revenues and expenses with the projected budget. If revenues or expenses are over or under projections by more than 5 percent, the Program Manager must take the steps necessary to ensure financial stability. In order to meet this requirement, the medical facility's Chief Financial Officer must provide to the CWT-TR Program Manager a quarterly CWT-TR Budget Report, which contains a beginning balance, total revenues, expenses by cost center, and the ending balance of the CWT-TR GPF account. The CWT-TR Program Manager must provide the quarterly report to the Director, MH RRTP in VACO-OMHS.

## **2. VA VOLUNTARY SERVICE COMMITTEE**

a. VAVS promotes and coordinates volunteer activities within the VA health care community as authorized by VHA policy and through the Secretary's authority codified at 38 U.S.C. 513.

b. Fiscal Service at each VA medical facility must establish, at the request of the Voluntary Service Officer/Program Manager (or designated individual), VAVS Committee 8180A and 8180S GPF accounts. Treasurers of VAVS Committees, with the concurrence of their Voluntary Service Officer/Program Manager, may request the withdrawal of funds from their VAVS Committee GPF account. Fiscal Service at each VA medical facility shall use the simplest possible procedures to timely process such requests for withdrawals from this account. A Treasury Report or VAVS Committee Financial Report of those GPF accounts controlled by the VAVS Committee must be provided at the facility's quarterly VAVS Committee meetings. VAVS Committees may not use any other outside accounts for the deposit and maintenance of donated funds (e.g., bank or credit union accounts). All accounts or investments external to VA, under the purview of a VAVS Committee, are prohibited.

c. Funds deposited in the VAVS Committee GPF Accounts may be used, as approved by the VAVS Officer/Program Manager, to provide support for programs, activities, or purposes that assist in carrying out the business and goals of the local VAVS Committee, unless the donor designates a specific use for the funds. Some examples are:

(1) Gifts, including gift cards and canteen books, distributed to patients on National Salute to Veteran Patients Week, Memorial Day, National Prisoners of War and/or Missing in Action Recognition Day, Veterans Day, Armed Forces Day, Christmas, and other special days.

(2) Canteen coupon books and personal-care items for patients. **NOTE:** *Instructions for the control of canteen coupon books are contained in VHA Handbook 1008.01.*

(3) Refreshments served during VAVS activities and other VA medical facility special events when patients are invited.

(4) Support for VAVS volunteer recognition awards and ceremonies or purposes, including youth volunteer recognition, and/or to promote volunteer recruitment and retention initiatives.

(5) Support for patients attending the National Events.

(6) Support for the Annual VAVS National Advisory Committee (NAC) Meeting and Conference, which entails transferring funds from a facility VAVS Committee GPF account to the VAVS Committee GPF account of the NAC host facility.

## STANDARD OPERATING PROCEDURES E-DONATE

### 1. GENERAL

a. **VHA Office Of Finance (10A3).** Responsible for the oversight of the E-DONATE program. This includes establishing policies and procedures, security, and provisions of customer service for the E-DONATE Program.

b. **The US Treasury.** Provides an internet portal that will allow individuals to use the Pay.gov web-portal to make on-line donations to a particular VHA Facility and a specific GPF program. The US Treasury sets up an account and assigns a merchant ID unique to each of the Veterans Integrated Service Networks (VISNs) upon receipt of the completed Card Acquiring Service Application (CASA) form.

c. **Austin Information Technology Center (AITC).** Responsible for the receipt and transmission of Pay.gov data to the VHA Facilities.

(1) Receive Pay.gov data;

(2) Process Pay.gov data in Austin;

(3) Transmit Pay.gov data to VHA Facilities via the General Post Fund Donation mail group; and

(4) Transmit Pay.gov data to the Financial Services Center (FSC) Accounting Reconciliation & Reports Division.

d. **Financial Services Center (FSC) Accounting Reconciliation & Reports Division.** Responsible for the review and reconciliation of donations received through the Transaction Reporting System (TRS).

e. **VHA Facilities.** Responsible for accepting donations received through Pay.gov, and crediting each donation to the General Post Fund (GPF) Program designated by the donor; notifying Voluntary Service a donation is received electronically and downloading the Pay.gov query report for Voluntary Service for the purposes of sending the required acknowledgement letter to the donor; re-routing transmissions received in error to the correct VHA Facility, and processing refunds. Local Voluntary Service will prepare a letter of acceptance or non-acceptance to each donor upon receipt of notification and the Pay.gov report from Finance that a donation has been received by the facility.

f. **VA Voluntary Service.** Responsible for promoting E-DONATE to the VHA Facilities, and reporting to VA Leadership on the effectiveness of the E-DONATE program.

### 2. PROCEDURES

a. **VHA Office of Finance (10A3).**

(1) **Oversight.**

(a) The VHA Office of Finance (10A3A) will conduct periodic review of the E-DONATE program to ensure VHA Field Facilities are in compliance with guidelines set forth in VHA Financial Policies and Procedures.

(b) The VHA Office of Finance (10A3A) will serve as liaison for all communication between the US Treasury and the Department of Veterans Affairs for the E-DONATE program.

(2) **Information Security.**

(a) Submit requests to Pay.gov Information Security, using the Pay.gov Access Control Spreadsheet for access of agency users and role assignment.

(b) Requests the addition, deletion, or modification of Pay.gov user login IDs assigned to VHA Facilities personnel.

(c) Participate in the annual review and recertification of agency users to ensure accounts defined in Pay.gov are necessary with the appropriate access.

(3) **Customer Service.** Respond to questions from the US Treasury, VHA Facilities, and donors.

b. **The US Treasury.**

(1) **Account Set-Up.**

(a) The US Treasury assigns an ALC+2 unique to each 21 VISNs.

(b) Creates a merchant ID account with Vantiv (formerly Fifth Third Processing Solutions) allowing VHA Facilities to receive credit card transactions.

(2) **Pay.gov.**

(a) Make donation forms accessible to donors in Pay.gov

(b) Grant users' access to Pay.gov

(c) Allows donors to make secure electronic donations directly from the donor's bank accounts or by credit/debit card.

c. **Austin Information Technology Center (AITC).** The AITC transmits information on donations received in Pay.gov to each VHA Facility.

(1) **What AITC Receives from Pay.gov.**

(a) Electronic Transmission. The electronic collection is received from Pay.gov by a certain time (12:00 noon CST) every business day, Monday through Friday except on Federal holidays.

(b) Alert Message. If the collections do not arrive at the AITC by the agreed-upon time (12:00 noon CST), the US Treasury (Pay.gov) will send an alert to the AITC by email or phone.

**(2) AITC Processes Pay.gov File.**

(a) Pay.gov Transmission Validation. The contents of the transmission is validated to ensure that everything Pay.gov sent is received and accounted for, and that only one transmission is received per day. If the validation fails, the file will not be processed and the AITC staff will coordinate the resending of the file with Pay.gov.

(b) Pay.gov Transmission Summarization. After validation, the information will be stored as a quality assurance measure. The AITC staff will be notified of the results of the transmission and any discrepancies experienced during transmission.

(c) Pay.gov Transmission Details. The detailed collections information from Pay.gov will be stored in the lockbox system for a period of seven (7) years. This is the first step in creating a record of the item; the record and its history will be available online for as long as the information is useful. This information is maintained for inquiry, reporting, accountability, and reconciliation purposes.

(d) Matched Collections. The AITC will review the collection and identify the appropriate VHA Facility that will receive the collection. Matched collection information is formatted and transmitted to the appropriate VHA Facility on a daily basis. A facility number, the amount, the General Post Fund (GPF) account, payment tracking ID, and the document ID are required before the record is transmitted.

(e) Tracking Outgoing Transmission. The AITC keeps a daily record of all outgoing transmission data such as transmission quantity, dollar value, where the collection was sent, and date of transmission.

**(3) What AITC Transmits.**

(a) Electronic Transmission. The AITC receives data from Pay.gov and after formatting, transmits a daily record of collections to the VHA Facilities via the General Post Fund Donation mail group in the following format:

1. Station number
2. Program number (FCP)
3. Donated Amount
4. Deposit Date

5. Deposit Number:

a. for ACH donations – prefix 178 followed by the six digit deposit ticket number (178XXXXXX)

b. for credit/debit card donations – prefix 179 followed by the month, day, and year of the donation (179MMDDYY)

6. Pay.gov Tracking ID

(b) Online Reports. Summary transmission data (including zero transmission reports) and other reports are provided online for VHA facilities and AITC verification and information. The Pay.gov online reports provide agencies with details of all transactions, both pending and settled. The reports contain information including agency tracking ID, payer, transaction amount, payment type, and transaction date, and can be used in conjunction with Collection Information Repository (CIR) reports to reconcile transactions. (see Pay.gov reporting guide for details)

d. **The Financial Service Center (FSC).**

(1) **Reconciliation.**

(a) The AITC will provide the FSC a monthly report of all collections and amounts received for each VHA Facility.

(b) The Treasury and FMS data is imported into FASMatch. (FASMatch is FSC's application for automated data matching and account reconciliation solution, which eliminates manual processes and provides an accurate audit trail).

(c) The FSC 224 section ensures all transactions are recorded and matched.

(d) All unmatched transactions will be recorded on the monthly 224 reconciliation report and forwarded to the VHA Facilities for manual matching.

e. **VHA Facilities.**

(1) **What VHA Facilities Receive.** The Facility receives AITC electronic transmitted data. The transmission file contains donations received the previous day as well as donations that may have been collected up to 30 days ago.

(2) **VHA Facilities Process Electronic Transmitted Data**

(a) Accounting reviews the transmitted data for accuracy.

(b) Identify the matching account, and record transaction in FMS.

(c) The following information is used by the facility when posting into FMS:

1. Document ID:

a. 673XXXXXX (for ACH) six digit deposit ticket #

b. 673 MMDDYY (for credit/debit card)

2. Deposit Number:

a. 178XXXXXX (for ACH)

b. 179 MMDDYY (for credit/debit card)

3. Transaction Type: 53

4. FUND: 8180S

5. Rev. Source: 9041

(d) Accounting performs monthly reconciliation of all GPF accounts to the general ledger.

(e) Accounting provides Voluntary Service a report of all donations received.

f. **VA Voluntary Service (VAVS).**

(1) **Communicate E-Donate to VHA Facilities.**

(a) The VAVS program manager coordinates with the local VHA facilities Public Affairs Officers (PAOs) to promote E-DONATE.

(b) E-DONATE is communicated using the following methods:

1. A donor link on each VA Medical Center Web-page

2. Department of Veterans Affairs and local Facebook page

3. Medical Center bulletin boards and digital signage

4. My HealtheVet

(2) **Reporting.** VAVS provides statistical reporting to VA Leadership on donations received through Pay.gov. **NOTE:** *Voluntary Service facility offices are to use the Voluntary Service System (VSS) donations package to record all donations. (See VHA Handbook 1620.01).*