Texas Regional Broadband Program

Financial Administration & Reimbursement Best Practices Tool

1. Understand the Different Quarterly Deadlines

TRBP programmatic reporting and financial reimbursement follow the same quarterly periods, but they have **different submission deadlines**.

Requirement	Due Date	Purpose
Quarterly Performance Report / Regional Plan Update	15th of the month following quarter-end	Documents programmatic progress and Regional Plan development
Quarterly Reimbursement Request	30 calendar days following quarter-end	Requests reimbursement for eligible expenditures incurred during the applicable period

Example: For the April 1 - June 30 quarter, the Quarterly Performance Report is due July 15, while the reimbursement request is due July 31.

Best Practice

COGs should establish an internal quarter-end process that allows program staff to complete programmatic reporting while finance staff continue finalizing, leveling, and reconciling expenses for reimbursement.

Suggested workflow:

Quarter Ends → Programmatic Report Finalized → QPR Due on 15th → Finance Finalizes Expenses → Reconcile Financial Records → Reimbursement Request Due 30 Days After Quarter-End

The 15th should not be treated as the financial reimbursement deadline.

2. Know the Purpose of Each Financial Document

One recurring source of confusion has been the difference between the *Budget Workbook, reimbursement invoice, and underlying financial records.*

Budget Workbook = The Financial Plan

The Budget Workbook reflects the COG's approved/planned use of TRBP funds by program year and budget category.

It is not intended to serve as a quarterly actual expenditure report.

TRBP Invoice = The Reimbursement Request

The invoice reflects actual eligible expenditures for which the COG is requesting reimbursement during the applicable billing period.

General Ledger and Income & Expense Statement = Financial Support

These records support and reconcile the expenditures reported on the reimbursement request.

Best Practice

Do not modify the Budget Workbook simply to make it match a quarterly invoice.

Actual quarterly expenditures do not need to be entered into Budget Workbook fields that were designed to reflect planned expenditures. Instead, the currently approved Budget Workbook should accompany the reimbursement package so TARC can confirm that expenses are consistent with approved budget categories.

3. Submit a Complete Quarterly Reimbursement Package

A complete TRBP reimbursement package should include the required financial documents for the applicable reimbursement period.

Reimbursement Package Checklist

☐ Completed TRBP Invoice
☐ Current approved Budget Workbook
☐ General Ledger
☐ Income & Expense Statement
☐ Certification Statement/Letter on COG letterhead

COGs should conduct an internal review before submission to make sure amounts are consistent across the applicable financial records.

Best Practice

Have both the program lead and finance staff review the reimbursement package when practical. Finance staff can verify the accounting records while program staff can confirm that expenditures correspond to eligible TRBP activities.

4. Complete the Invoice Cover in Full

Several reimbursement questions have involved administrative fields on the invoice rather than the underlying expenses.

Before submitting an invoice, confirm that the following information is complete:

☐ Correct billing period
☐ TINS #
☐ Invoice Number
☐ Invoice Date

☐ Applicable reimbursement amounts/categories
☐ “N/A” entered for fields that do not apply rather than leaving them blank

Examples of fields that may require **N/A** include:

- RTI#
- Terms
- Customer No.

For the initial combined Q1/Q2 reimbursement authorized by BDO, the applicable billing period was February 1, 2026 - June 30, 2026. Future invoices should use the applicable reimbursement period established by current TRBP guidance.

Best Practice

Use an internal invoice checklist before submission. Small administrative omissions can result in unnecessary follow-up and delay review even when the underlying expenditures are otherwise adequately supported.

5. Use a Standard Certification Letter

The certification statement is a required component of the reimbursement package and should be submitted on the COG's letterhead.

To reduce inconsistency and unnecessary administrative work, TARC will provide participating COGs with a standard certification letter template.

Recommended Template Fields

- COG name
- Applicable reimbursement/reporting period
- Required certification language
- Reimbursement amount, if required by the established certification
- Authorized official's name and title
- Signature
- Date

Best Practice

Use the TARC-provided certification template each quarter rather than recreating certification language.

6. Retain Supporting Documentation - Even When It Is Not Submitted

COGs are not routinely required to submit every supporting transaction document with the quarterly reimbursement package.

However:

Not submitted does not mean not required to be maintained.

COGs should retain appropriate supporting documentation in accordance with applicable record-retention requirements.

Examples may include:

- Payroll records
- Time/activity records
- Travel documentation
- Receipts
- Vendor invoices
- Contracts
- Procurement documentation
- Proof of payment
- Meeting/event documentation
- Approvals
- Other records demonstrating the relationship between the expense and TRBP

These records may be requested by TARC, BDO, KPMG, auditors, or other authorized reviewers during monitoring or future review.

Best Practice

Maintain reimbursement documentation as expenses occur, rather than attempting to recreate the record during monitoring.

7. Actively Manage the Budget Workbook

Actual spending will naturally vary from projections. A difference between projected spending and actual quarterly expenditures does not automatically require a budget amendment.

An amendment becomes appropriate when the COG's underlying spending plan changes.

Examples

A COG may determine that it needs:

- Less funding for printed materials;
- Additional funding for equipment;
- Different anticipated travel expenditures;
- Changes in personnel costs;
- Different contractual service needs; or
- Other changes among approved budget categories.

Best Practice

Regularly compare:

Approved Budget → Actual Expenditures → Remaining Balance → Projected Program Needs

When the underlying spending plan changes, provide TARC with an amended Budget Workbook showing the proposed adjustment.

8. Moving Funds Between Budget Categories

COGs may encounter circumstances where funding originally budgeted in one category is better used for another eligible program need.

Based on guidance provided during initial implementation, COGs have been instructed to submit an **amended Budget Workbook** reflecting such adjustments so TARC has an updated budget to reference moving forward.

Best Practice

If a COG proposes moving funds between categories:

1. Identify the amount/category being reduced;
2. Identify the category being increased;
3. Explain the anticipated programmatic use;
4. Confirm the proposed use remains an eligible TRBP activity; and
5. Submit the amended Budget Workbook to TARC for review.

COGs should avoid waiting until reimbursement submission to disclose a significant change in their spending plan.

9. Budget Carry-Forward Between Program Years

TRBP operates over a multi-year grant period. During implementation, COGs may determine that funds originally anticipated for one program year will instead be needed in a subsequent year.

Guidance provided to date has allowed COGs to revise their Budget Workbooks to reflect anticipated carry-forward of unspent funds within the overall TRBP grant period, provided funds continue to support eligible program activities.

Best Practice

COGs should not spend funds simply to exhaust an annual allocation.

A COG also does not need to prematurely finalize a future-year budget when activities are still being developed with regional stakeholders. Budget estimates should be based on reasonably anticipated program needs and revised as those activities become better defined.

10. Eligibility Comes Before Budget Availability

The presence of funding within a budget category does **not by itself make an expense eligible**.

Before incurring an expense, COGs should consider:

1. Is the activity allowable under the TRBP Program Agreement?
2. Is the cost directly related to TRBP?
3. Is it reasonable and necessary?
4. Is it consistent with the approved Budget Workbook?
5. Is it adequately documented?
6. Does it comply with applicable procurement, travel, financial, and other requirements?

Best Practice

For a new, unusual, or unclear expense, contact TARC **before** committing funds.

11. Remember: TRBP Is Not an Infrastructure Construction Grant

TRBP supports regional planning, coordination, capacity building, stakeholder engagement, digital opportunity activities, and implementation readiness.

The TRBP Program Agreement specifically provides that program funds may not be used for **broadband infrastructure construction or the purchase or installation of network equipment**.

This does **not** mean COGs should avoid infrastructure-related planning.

COGs can use TRBP to:

- Assess broadband infrastructure needs and gaps;
- Engage ISPs and cooperatives;
- Identify and prioritize broadband projects;
- Convene partners;
- Coordinate regional initiatives;
- Support implementation readiness; and
- Help communities and partners identify future funding opportunities.

Best Practice

Think of the distinction as:

TRBP may support the planning, coordination, partnerships and readiness needed to advance a broadband project; TRBP does not pay for construction of the broadband infrastructure itself.

13. Program and Finance Staff Should Work Together

Many of the questions received during the first reimbursement cycle were not strictly accounting questions or strictly program questions - they involved the intersection of both.

Finance staff may know what was spent, while program staff may be better positioned to explain why the expense was necessary for TRBP.

Recommended Quarterly Process -

Program Staff

- Confirm activities occurred;
- Complete programmatic reporting;
- Provide program documentation/context to finance.

Finance Staff

- Finalize actual expenses;
- Reconcile GL and financial statements;
- Prepare invoice;
- Verify supporting documentation;
- Confirm costs align with approved budget.

Program + Finance

- Review package;
- Resolve discrepancies;
- Confirm current Budget Workbook;
- Submit reimbursement request;
- Retain complete supporting file.

14. Prepare for Monitoring Throughout the Year

Monitoring readiness should be an ongoing financial-management practice rather than a separate exercise performed only when a review is announced.

Monitoring-Ready File

For each reimbursement period, COGs should be able to readily produce documentation supporting sampled transactions.

A strong file should allow a reviewer to understand:

What was purchased/charged?
When was it incurred?
Who approved it?
How was it procured, if applicable?
How was the amount calculated?
Where is it recorded in the accounting system?
Why is it related to TRBP?
Where does it fit within the approved budget?

Best Practice

If a reviewer cannot reasonably reconstruct the transaction from the file, strengthen the documentation **before** submitting the reimbursement request.

Quick Reference: Common TRBP Finance Questions

Question	General Guidance
Does the Budget Workbook need to match quarterly actual expenditures?	No. It reflects the approved spending plan.
Where are actual reimbursement-period expenses reported?	TRBP Invoice and supporting financial records.
Do I update the Budget Workbook every quarter?	Submit the current approved workbook; revise it when the underlying budget/spending plan changes.
Can funds be moved between categories?	Submit an amended Budget Workbook to TARC reflecting the proposed change.
Should blank invoice fields be left empty?	Use N/A for fields that are not applicable.
Do all receipts/payroll records accompany every reimbursement?	Not routinely, based on current guidance; retain them for monitoring/review.
Is the QPR due date also the reimbursement deadline?	No. QPR is due on the 15th; reimbursement is due 30 days after quarter-end.
Can TRBP pay for broadband construction?	No. Infrastructure construction and purchase/installation of network equipment are prohibited.
Does having money in a budget category automatically make a cost eligible?	No. The underlying expense must still meet TRBP requirements.
What should we do when eligibility is unclear?	Ask TARC before incurring the expense whenever possible.