

Homeless Veterans' Reintegration Program (HVRP)
Post-Award Conference: Incremental Funding and Closeout
July 28, 2022
Questions and Answers

Budget and Spending

Q: What if an HVRP grantee hasn't spent down all the money from 2020?

A: If a grantee has not spent down the money from a specific year of their three-year grant, they need to discuss the situation with their Grant Officer's Technical Representative (GOTR). The GOTR can assist with any necessary adjustments to the original award package. Specific guidance for grant modifications is provided in [Veterans' Program Letter \(VPL\) 06-18, Change 1](#).

Q: What happens to funds that are not spent in the grant year that they were allocated? Do those funds have to be spent before the funds for the following grant year are allocated?

A: If a grantee has not spent down the money from a specific year of their three-year grant, they need to discuss the situation with their GOTR. The GOTR can assist with any necessary adjustments to the original award package. Specific guidance for grant modifications is provided in [Veterans' Program Letter \(VPL\) 06-18, Change 1](#).

Q: If the variation in the line items is 10 percent or less, is it 10 percent of the line item or total budget?

A: The threshold for budget transfers relates to 10 percent or less of the total budget. If the grantee anticipates needing a budget realignment, they need to discuss the situation with their GOTR. The GOTR can assist with any necessary adjustments to the original award package. Specific guidance for grant modifications is provided in [Veterans' Program Letter \(VPL\) 06-18, Change 1](#).

Q: For indirect costs, can de minimis rate be used?

A: HVRP grantees must reference the Uniform Guidance on indirect costs at [2 CFR 200.414](#). For those organizations whose cognizant agency (i.e., the federal agency which is the source of the preponderance of the grantee's direct funding) is the U.S. Department of Labor, they can contact the [Division of Cost and Price Determination](#) for further information and guidance.

Q: How do grantees know to ask for a Negotiated Indirect Cost Rate Agreement (NICRA) and not use the de minimis funds?

A: A grantee will make their selection between NICRA and de minimis in their HVRP application. This will be an organization-wide practice—if a grantee organization is using NICRA for another federal grant, they cannot use de minimis for HVRP. HVRP grantees

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- [Indirect Cost 101 \(NVTI\)](#)
- [Overview of Indirect Costs Training \(NVTAC\)](#)

Q: How long does it usually take for a grant modification to be processed?

A: VETS does not have a typical timeframe for grant modifications as we all learn how those will flow through the GrantSolutions system. Grantees should work with their GOTRs to determine the timing of submission of modification requests.

Grant Closeout

Q: For closeout timing, does 120 days start from the intended end of the fiscal year, as opposed to the actual day of spending?

A: All closeout documents are due 120 days after the final day (June 30) of each year of the three-year period of performance, which is October 28 of every year of the grant.

Q: What does a grant closeout entail?

A: Grantees will receive an email notification from the U.S. Department of Labor, Employment and Training Administration (ETA) reporting system when their grant has reached the point of closeout. The email outlines what the grantee will need to provide under the closeout process, including specific documentation. Grantees should copy their GOTR on all closeout communications. For additional information, NVTI has developed a webinar focused on grant closeout: [Grants Closeout Process for Grantees](#).

Q: What if we've reached the end of our three-year period of performance and in the Payment Management System (PMS), there's only a file for the completed Federal Financial Report (FFR) with a due date of 90 days from the end of the period of performance? On top of that, there is no quarter four (Q4) FFR to complete and certify by June 30th. In the past, the Q4 FFR was used in crosswalk with the Q4 fiscal data in the Technical Performance Report (TPR) and had an extended deadline to complete a final FFR. Once the final FFR is completed, if there are any discrepancies between the Q4 TPR and the FFR, what will grantees need to do about the Q4 TPR?

A: For the third year of a grant's period of performance, the fourth quarter report is referred to as the annual report in PMS. Grantees should contact their GOTR about any discrepancies between a submitted TPR and FFR.

Policy

Q: What is the process to add additional service delivery areas?

A: If a grantee would like to expand their service delivery area, they will need to work with their GOTR in requesting an amendment. The grantee would need to make a strong justification for the expansion of the service delivery area. Specific guidance for grant modifications is provided in [Veterans' Program Letter \(VPL\) 06-18, Change 1](#).

Q: Is a reduction in the service delivery area allowed?

A: No, a reduction in service delivery is not allowed.

Q: Why are employed clients called “exit” if we’re still providing services?

A: After an HVRP participant enters employment (i.e., exits), the grantee can still provide follow-up services to support their employment. The [FY22 FOA](#) defines exiter as follows:

“Exiter—For the purposes of VETS’ competitive grants, a participant who is placed or dropped during a quarter and is not scheduled to receive future homeless veterans program services for the next 90 or more days is considered an exiter. The following services do not count as “future services”:

- Additional career planning;
- Contacting the employer;
- Assisting with work-related problems;
- Peer support groups;
- Informational mailings;
- Co-enrolled partner services extending beyond the end of the active period of performance for the competitive grant award;
- Follow-up tracking services; and
- Provision of post-exit support services for job retention” (Attachment C, p. 6).

Q: What are the new requirements around the Certificate of Release or Discharge from Active Duty (DD-214) and SQUARE verifications?

A: [Grant Officer Memorandum 01-21, Change 2](#) extends the period during which the Veterans Affairs Medical Centers’ Hospital Inquiry (HINQ) and Status Query and Response Exchange System (SQUARES) may be used as alternatives to the DD-214 in establishing HVRP eligibility through June 30, 2023. VETS is also considering longer-term options for eligibility determination in updating HVRP policies.

Q: The Cleveland United States Department of Veterans Affairs no longer uses HINQ, can we use Vendor Inquiry System (VIS) instead?

A: No. As provided in [Grant Officer Memorandum 01-21, Change 2](#), the two allowable alternatives to the DD-214 are HINQ and SQUARES.

Q: Can a grantee use HVRP funds to subsidize employment for a veteran?

A: Yes, as provided in the [Fiscal Year 2022 \(FY22\) Funding Opportunity Announcement \(FOA\)](#). The FOA explains how a grantee can use HVRP funds to subsidize employment for a veteran. If a grantee is working with an employer and they are hesitant to hire a participant, the grantee can set up a memorandum of understanding (MOU) that allows the grantee to subsidize the veteran's wages for a set time limit. From the FOA: "Examples of wage subsidies include On-the-Job Training (OJT), subsidized apprenticeships, and/or Transitional Jobs (TJ) strategies. The participant must be engaged in job training, and the employer expects to hire the participant at the end of the job training. Funds may be used to pay job training wages for up to 90 days, based on United States Housing and Urban Development (HUD) housing figures, see <https://universallivingwage.org/wage-calculator/>, for up to 20 hours per week. In order to use HVRP funds for OJT, subsidized apprenticeships, and/or TJ wages, grantees must demonstrate the participant's need for subsidizing job training wages and develop an agreement with the employer that stipulates the terms of the subsidy, duration of the job training, and must lead to employment. The agreement must stipulate that HVRP funds will reimburse the employer for the agreed-upon earnings to be subsidized. Subsidized job training is not a job placement. **An awarded grant will be required to have an SOP to ensure this process is implemented and executed consistently and equitably**" (p. 32).

Q: Can grantees use HVRP funds to expense on-the-job training (OJT) with Workforce Innovation and Opportunity Act (WIOA)?

A: Yes, grantees can expense OJT, but it must be in their initial budget, and they must have relevant Standard Operating Procedures (SOPs) in place. If that is not in their budget, then they will need to work with their GOTR to request an amendment.

Q: If there is a veteran placed, but on day 180, they become unemployed, are we able to provide funds to help them secure employment?

A: If a participant returns more than 90 days after exit, the grantee can choose to re-enroll the participant in order to provide the full range of HVRP services if the participant still meets the HVRP eligibility criteria. The new enrollment should be assigned the same unique participant identifier.

Q: If a veteran has a status of Other than Honorable (OTH), are they eligible for HVRP?

A: Yes, a veteran may qualify for HVRP services if they have an OTH discharge. In accordance with [38 U.S.C. 2002](#), the following categories of veterans are NOT eligible for HVRP services: "i. (A) received a dishonorable discharge from the Armed Forces; or ii. (B) was discharged or dismissed from the Armed Forces by reason of the sentence of a general court martial."

- Q:** Will you begin tracking Lesbian, Gay, Bisexual or Transgender (LGBTQ) participants?
- A:** Yes. Although VETS does not currently track HVRP participants who identify as LGBTQ, that is a goal for the future to ensure that VETS is best serving traditionally underserved communities.

Providing Feedback

- Q:** Are there sessions for grantees to provide feedback about how grants and reports can be more effective and more user-friendly?
- A:** Yes! VETS holds [Quarterly Performance Reporting Listening Sessions](#) on the last Wednesday of every quarter to solicit feedback on performance reporting. NVTAC also holds monthly [Community of Practice](#) sessions dedicated to specific topics and allowing time for grantee discussion and feedback. Grantees can email contact@nvtac.org to ensure that they receive notice of these sessions and other feedback opportunities.