# Homeless Veterans' Reintegration Program (HVRP)
## Post-Award Conference: Terms and Conditions
## July 19, 2022
## Questions and Answers

## Presentation Materials

**Q:** Are we able to get a copy of the slides?

**A:** Recordings and slides for each of the Post-Award Conference (PAC) sessions will be posted to the National Veterans' Technical Assistance Center (NVTAC) website.

## Find a Grantee Map

**Q:** When multiple grant recipients cover the same area, will the map list all of them?

**A:** The map lists the full coverage area for each grantee.

**Q:** How do we get grant information corrected on the NVTAC website?

**A:** Please email contact@nvtac.org with any corrections to grantee information on the NVTAC website.

## Data Management and Security

**Q:** I am searching for an automated system to manage our information. Would anyone kindly recommend a system?

**A:** The Department of Labor does not recommend one system over another, but fellow grantees may have recommendations. You can find and identify fellow grantees through the Find A Grantee map.

**Q:** What are the requirements for HVRP grantees using cell phones?

**A:** The Fiscal Year 2022 (FY22) Funding Opportunity Announcement (FOA), under which newly awarded grantees applied for an HVRP grant, includes a section on Safeguarding Data Including Personally Identifiable Information (PII), which walks through specific requirements for grantee handling of data (p. 39-41). This includes a reference to Training and Employment Guidance Letter (TEGL) 39-11, which grantees must also follow. The primary focus of these requirements is ensuring that PII and sensitive data developed, obtained, or otherwise associated with grants funded by the U.S. Department of Labor, Veterans' Employment and Training Service (DOL-VETS) are securely transmitted.

**Q:** Do I need an SOP in the case of a potential breach?

**A:** As stated in the FY22 FOA, grantees are subject to all applicable federal laws and regulations, including the Office of Management and Budget Uniform Guidance and the terms and conditions of the award. The Uniform Guidance includes specific requirements on internal controls in 2 CFR 200.303. Beyond that, DOL-VETS does not have specific requirements for individual Standard Operating Procedures (SOPs), but DOL-VETS does have an expectation that grantees have specific policies and procedures in place for basic functions. That would include the handling and management of data, including how to handle any data breach. Please reach out to your GOTR for further instruction, as well as for examples of SOPs that other grantees may have produced. NVTAC will also work on developing sample SOPs that grantees can customize for their use.

## Continuity of Operations Plan (COOP)

**Q:** For those who have received incremental funding and submitted the COOP last year, are we required to update it yearly?

**A:** It is a good practice for grantees to review their COOP annually to ensure that all of the information is current and accurate. If any information is updated, the grantee should share that updated COOP with their Grant Officer's Technical Representative (GOTR). If the grantee is assigned a new GOTR, they should share their previously submitted COOP with their new GOTR.

**Q:** Would COVID regulations/operating virtually be part of the COOP SOP?

**A:** Those are great examples of situations where a COOP would be valuable, ensuring continuity of operations in changing external circumstances. The FY22 FOA states the following regarding COOPs: "To ensure that grantees are able to continue performance under a broad range of circumstances, an awarded grant will be required to submit a Continuity of Operations Plan (COOP) to the Grant Officer Technical Representative (GOTR) 120 days after receiving the Notice of Award."

## Grant Modifications

**Q:** If we are wanting to move funds from one cost category to another, do we have to request a grant modification?

**A:** Budget realignments between cost categories may require a grant modification, particularly if they are over 10 percent of a grantee's total budget. Specific guidance for grant modifications is provided in Veterans' Program Letter (VPL) 06-18, Change 1.

**Q:** When will we be able to submit a grant modification to our current program year in GrantSolutions?

**A:** Grantees should be able to submit grant modifications in GrantSolutions once they have access to the system. However, if a grantee is having any issues with access to the system or submitting a grant modification through the system, they should consult their

GOTR and contact the GrantSolutions helpdesk by email at help@grantsolutions.gov. Once grantees have access to the system, they can also access GrantSolutions-provided trainings directly.

## Budget and Spending

**Q:** If we have a grant for three years and if we have some remaining funds from year 1, can we carry over the remaining year 1 amount to the year 2?

**A:** Yes, a grantee may spend any unspent funds from year 1 in year 2 of the period of performance. However, if a grantee is experiencing circumstances or challenges that are preventing them from spending their grant funds, they should reach out to their GOTR to discuss those challenges. Note well, there will be no carryover funds during the last year of the grant period of performance. All funds must be obligated by the last day of the grant award. Any unobligated balances at the end of the three-year grant award will be returned to the government.

**Q:** Is a 1099 paid contractor eligible for a phone, or should they supply their own to provide services for the grant?

**A:** The grantee can choose how to handle technological and other operations costs, but must ensure that those are documented in written policies and procedures (e.g., SOP).

**Q:** What is considered 100% full-time hours? After 40 hours dedicated, are we allowed to work on a separate project?

**A:** The definition of a full-time equivalent (FTE) is at the discretion of the employer (i.e., grantee). The FY22 FOA and Grant Officer's Memorandum (GO Memo) 01-22, Attachment 2 require that the applicant/grantee Budget Narrative includes a listing of all staff positions by title (both current and proposed) including the roles and responsibilities. For each position give the annual salary, the percentage of time devoted to the project, and the amount of each position's salary funded by the grant. GO Memo 01-22 also requires that for staff who are less than 100 percent, the GOTRs must verify the percent of fringe benefits is accurate, in grantee requests for incremental funding for the second and third years of the three-year grant.

**Q:** Can I get the specifics to where the mileage guidance is at in Terms and Conditions?

**A:** Part D, #8.

**Q:** IRS just changed the mileage rate to 62.5 cents per mile as of July 1, 2022. Has GSA rate changed too?

**A:** The current GSA mileage rate, as of July 1, 2022, is 62.5 cents per mile.

**Q:** Where can we learn more about our options for indirect costs, either through a Negotiated Indirect Cost Rate Agreement (NICRA) or De Minimis?

**A:** Grantees need to follow the rules provided in the terms and conditions of their grant.

Additional instructional materials are available through the National Veterans'
Training Institute (NVTI) and NVTAC, including the following:

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

**Q:** Regarding equity building, we are focusing on leveraging resources with the Workforce
Innovation and Opportunity Act (WIOA) providers. Asking that they spend their money
on On-the-Job Training (OJT). Because most of them seem to have very little experience
with it, then it's become a tough sale. At the federal level, could there be a push for more
joint efforts, that would include OJTs?

**A:** That is a great suggestion! We can absolutely do a better job nationally and really push it
down so that is happening at the local level. NVTAC will explore that idea further.

## Reporting

**Q:** Where do we complete and submit the Federal Financial Report (FFR) SF-424 quarterly
reports now?  I see the reports in GrantSolutions, but I'm unable to complete or submit.

**A:** Grantees will be able to submit their FFR in the Payment Management System
(PMS). If grantees have any issues with access to PMS or submitting any forms
through the system, they should consult their GOTR and contact the [PMS Help Desk](#).
If grantees are having any issues with access to GrantSolutions, they can reach the
GrantSolutions helpdesk by email at [help@grantsolutions.gov](mailto:help@grantsolutions.gov). Once grantees have
access to the system, they can also access [GrantSolutions-provided trainings](#) directly.

**Q:** I am having difficulty with the PMS. Specifically, I don't see the FFR for Q4. Where
should I go for assistance?

**A:** You can contact the [PMS Help Desk](#) directly. But please also follow up with your GOTR
to let them know that you are having difficulty with the system.

## Additional Policies and Procedures

**Q:** Is there a list of all the SOP's that should be in place to be sure we haven't missed any of
them?

**A:** DOL-VETS does not have specific requirements for individual SOPs. However, DOL-
VETS does have an expectation that grantees have specific policies and procedures in
place for basic functions. The [Welcome Packet](#) provides a checklist for key steps in the
first 30-45 days after award, which may also be helpful.

**Q:** Can you tell us where the statement of work is found?

**A:** Each grantee receives a statement of work in their grant award.

**Q:** What is SAM?

**A:** System for Award Management (SAM). The FY22 FOA requires that all applicants must register with SAM before submitting an application, and must maintain an active SAM registration with current information at all times during an active federal award. Additional information is available on the [SAM website](#).

**Q:** What counts as "Workforce Products" from Part F, #5 of the T/C, requiring a statement of funding of production of those materials? (Especially for the printing of U.S. Department of Labor (DOL) posters)

**A:** Federal law requires recipients of DOL grants and cooperative agreements to acknowledge federal funding when publicly discussing any projects or programs that DOL funded through its annual appropriation. The disclosure is not required for laws or requirements such as workplace posters required by DOL.

**Q:** How do you all recommend handling issues where conflict of interest is a problem? Overall, does the GOTR have the final say? The example is when each organization has their own objective, and the agency is not in agreement with the GOTR. What's the problem-solving method for that?

**A:** A grantees' terms and conditions includes an order of precedence explaining which law, regulation, or policy outweighs another. The GOTR can certainly advise on specific situations or scenarios.